

CAM LOCAL ENVIRONMENT AGENCY PLAN

Statement of Consultation Responses

October 1998

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1.0 INTRODUCTION

The Cam Local Environment Agency Plan (LEAP) Consultation Report was launched in January 1998, which marked the beginning of a three month consultation period.

This Statement of Consultation lists the responses received during that consultation period. It is important that all responses on the Consultation Report are recognised and acted upon as this will influence the LEAP process and help develop partnerships. We are committed to public consultation and encourage comment from interested parties and the general public.

Therefore, the Agency has produced this Statement of Consultation report, which aims to:

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

Table 3 describes the feedback received including errors and omissions.

This report will be reproduced in an abridged form in the forthcoming Action Plan.

2.0 INITIAL CONSULTATION

An 'Early-Consultation' Meeting was held at the Cambridge Garden House on 5th September 1997. This was an informal gathering of interested parties which allowed them to express any views or concerns about this LEAP area to Agency staff. Over 50 people attended. All comments from this meeting were considered and, where appropriate incorporated into the Consultation Report.

FRCA provided information on agricultural land use and trends and details of MAFF agri-environmental initiatives which were included in the Consultation Report.

3.0 FORMAL CONSULTATION

To encourage formal responses to the Consultation Report, the following were undertaken:

- Distribution & Promotion - The document was distributed to over 100 organisations and individuals.
- Documents, summary leaflets and Poster Displays were sent to libraries and local authority offices by early January 1998. Over 140 full Consultation Reports have been distributed to date. Press Releases to promote the

consultation process were distributed at the beginning and towards the end of the process.

4.0 AREA ENVIRONMENT GROUP (AEG)

The Great Ouse AEG consists of a group of people from different walks of life representing our customers, for example, river user groups, local authorities, farmers and industrialists. The panel was kept informed of the progress of the plan at every stage and all panel members were given the opportunity to comment on draft documents.

Detailed feedback was made via a seven member sub-group of the AEG, who discussed the LEAP with the Agency Project Team at various stages of its production.

5.0 RESPONSES

There were in total 43 written responses to the report which are outlined in the table below. (All responses were acknowledged.) Verbal feedback given at the consultation meeting was also noted. All responses were considered while developing the Action Plan in a way which is believed to reflect a reasonable balance between the opinions expressed and the desire to ensure the plan is feasible and robust.

The number of responses made on each issue is tabulated below.

A response of 'No Comment' was received from the following organisations/persons:

English Nature (Suffolk Team); The Coal Authority; Waterbeach Level Internal Drainage Board and Countryside Commission (Eastern Regional Office).

Table 1: Number Of Responses Made On Each Issue

ISSUE NO.	ISSUE TITLE	NUMBER OF RESPONSES
1	Management of Water Resources to Protect Rivers and Wetlands.	10
2	The Water Resources Are Fully Committed So Embargo in Force on Future Development From Groundwater.	16
3	Concerns That Flows in River Cam Are Not Adequate to Meet 'In River Needs'.	13
4	Concern That Operation of Rhee Support Scheme is Not Ideal.	8
5	Concern That Operation of Lodes Granta Scheme is Not Ideal.	7
6	There is A Need to Assess and Where Appropriate Protect the Ecological Status of Headwaters.	7
7	There is A Lack of Habitat Diversity Both Within the Rivers and Their Floodplains.	8
8	Extent of Spread of Invasive Plants is Unknown and Therefore of Concern.	7
9	Public Access for Recreational Activities Needs to Be Improved.	13
10	Moorings and Lack of Pump-out Facilities in Cambridge.	9
11	Illegal Disposal of Commercial, Industrial and Domestic Waste.	5
12	Burning of BSE Infected Cattle At Vetspeed.	2
13	Burning of SLF At Barrington Cement Works.	4
14	East Anglia Cement Ltd. Shepreth (LS4) - Impact on Groundwater.	2
15	Groundwater At Eastern Counties Leather, Sawston, Contaminated with Chlorinated Solvents.	3
16	Unsewered Areas.	6
17	Impact of Closure of Formaldehyde Production on Water Balance and Quality At Ciba Specialty Chemicals, Duxford.	3
18	Identification and Remediation of Contaminated Land.	7
19	Ascertain the River Maintenance Needs in Cambridge.	6
20	Options for the Transport and Disposal of River Dredgings.	6
21	Monitoring of the Local Impact of Processes Using Radioactive Materials.	1

Table(s) 2: Responses From Consultees

The responses from consultee are given in issue number order. The actual comments have been edited and paraphrased for the sake of brevity. Meanings may, therefore, have changed slightly.

Issue 1: Management of Water Resources to Protect Rivers and Wetlands

Consultee (Date)	Comment	Response
IWA(Cambs) (24/3/98)	All of first four options are important, but the 'In River Needs' study is essential.	Noted.
Cambridge Motor Boat Club (CMBC) (12/4/98)	This issue if of prime importance. Option 1 - to promote 'In River Needs' is essential as it affects options 3-5.	Noted.
IWA (Head Office) (29/4/98)	Wish to be consulted when the review under the Habitats Directive is undertaken as part of Fenland SAC	Noted.
Ciba Specialty Chemicals (30/4/98)	Perceive links with Issue 17.	There are links between Issue 3 and Issue 17. We accept that the discharge made by Ciba is a valuable contribution to river flows, and the 'In River Needs' study mentioned in this issue may confirm this.
RSPB (1/5/98)	Support the production of WLMPs for wetland sites, as this was useful for the reserve at Fowlmere. Recommend the production of WLMPs for other wetland SSSIs in the LEAP area. Support the monitoring work carried out at Wilbraham Fen SSSI and would like to see the Agency monitoring the inflow from the support borehole at Fowlmere as specified in the WLMP.	Comments noted. The WLMPs planned for this LEAP area are given in Table 11. The quantity pumped is metred at the borehole site.
CPRE (4/5/98)	Water resources must be managed not only to protect the rivers and wetlands but also to protect the natural environment.	We accept that we have general duties to enhance the natural environment. Issue 1 refers to the specific duty to protect the water environment when allocating water for abstraction.
Cambridge Preservation Society (5/5/98)	Issues 1-6: in the chalklands there is no real substitute for adequate seasonal flows from springs to feed the rivers. It is ironic that river support schemes reduce aquifers in order to feed rivers during dry spells. The basic need is to support the aquifers which feed the springs and ensure new development does not threaten them. Historic features (eg, Hinxton Mill) rely on river levels.	Noted.

Consultee (Date)	Comment	Response
3.2 (18) South Cambs District Council (5/5/98)	Issue 1-5 focus on 'wetland', the Cam and the Rhee but the needs of the rivers must be considered across the district. The 'do nothing' options in this section are unacceptable.	Noted. We accept that 'do nothing' is not possible for Issue 1.
English Nature (27/4/98)	Support inclusion of this issue. It would be helpful if the WLMP sites could be identified in the plan together with the timescales for their completion. EN would wish to see Thriplow WLMP completed as a priority. EN willing to help Agency in the review of their consents for Habitat Regulation sites Wicken Fen and Thriplow.	The WMLP sites are given in Table 11. The high priority sites have been completed. Noted.
Cambs County Council (12/5/98)	Options which increase knowledge of water resource management are to be welcomed and are in keeping with the Council's Environment 2000 objectives.	Noted.

Issue 2: The Water Resources Are Fully Committed So Embargo in Force on Future Development From Groundwater

Consultee (Date)	Comment	Response
CLA (27/2/98)	Concerned that there is no provision in the planning system for new developers to be required to take into account of the importance and cost of improving the Region's water supply.	We accept your comments. The Environment Agency does provide information to the Planners about available water resources. Water companies would need to advise about cost of infrastructure.
Utlesford District Council (28/1/98)	Are aware of a number of private water supplies and most are experiencing problems with falling groundwater levels. These householders do not have the resources of the water companies to develop alternative supplies. Please give them some consideration within the wider picture.	The rights of people with private water supplies are taken into account when considering new applications to abstract. However, individual householders are responsible for their own supplies and may need to lower pumps to accommodate drought conditions.
IWA(Cambs) (24/3/98)	Suggest that the first 3 options should be in the following order: a) Reduce demand b) Import water (viable national policy on this matter urgently needed) c) Store water (this should be adopted when 'In River Needs' are known, and should include large flows to clear silt from river bed)	The options are not given in priority order. All are equal, valid and have seen progress. With reference to the comment on national policy for importing water, this aspect is considered in National Water Resource Strategies. However, abstraction licences are granted on a first come, first served basis so imports are secured as required from areas of surplus to areas of need.

Consultee (Date)	Comment	Response
CMBC (12/4/98)	Suggest that the first 3 options should be in the following order: a) Reduce demand b) Import water c) Store water There is a need for this to be done on a national scale.	All options are equally valid and are not given in order of priority - all options will be pursued (except do nothing).
T. Legge (1/4/98)	Concern that the frequent raising and lowering of river levels are putting fish stocks at risk by the operation of Bishops Mill, Newham Mill and Jesus Lock sluices by the Conservators of the River Cam.	Noted.
Andrew Lansley MP (24/3/98)	This issue requires more background information. Concerned that there should be interaction between the LEAP and the County Structure Plan in order to assess the potential for new development in the light of infrastructure to deal with sewage disposal and effects on groundwater levels.	There is interaction between the Environment Agency and the County Council with respect to Structure Plans. We provide information about available water resources. Many of these issues were addressed in our Water Resources Strategy (1994) which will be revised in 1999/2000.
Newport Parish Council (1/5/98)	Concerned that the river through Newport was completely devoid of water during the major part of last summer. Want to see measures included in the Action Plan which remedy the matter and concerned that Mott MacDonald are looking at the wrong section of the river.	We are aware of the problems in the Cam and hope to include plans in the Action Plan. Mott MacDonald are working on behalf of Three Valleys Water Co who have a limited remit with respect to the River Cam linked to the location of their boreholes and points of discharge.
RSPB (1/5/98)	Welcome the strong stance on embargo on further groundwater and summer surface water abstraction. Disadvantage of winter storage of flood waters is the potential increase in siltation of rivers as a result of decreased river flow. Reduction of water leakage would contribute to more efficient use of current water resources and should be the responsibility of water companies.	Noted. Noted. There already is pressure on the water companies to reduce leakage.
Cambridge Preservation Society (5/5/98)	Fully support this issue. Expects the Agency to make this clear in planning applications and environmental statements. Society's experience that water issues rarely appear in planning applications other than as 'drainage'. See above.	We accept your comments. We do provide information and advice about available water resources to planners in order to influence their decisions about development. Often the water company can supply within existing licence permissions and perhaps by importing water from elsewhere.
CPRE (4/5/98)	Most important issue. Demand for water for all purposes must be reduced. This will not allow development to meet the projected growth. Unlikely imported water would be able to support agriculture and the natural environment and no sense in building reservoirs on a large scale.	The construction of reservoirs to store winter water may be the only option available for agriculture.

Consultee (Date)	Comment	Response
English Nature (27/4/98)	<p>Favours demand management above other options put forward. Suggest that the long-term implications of winter water storage may ultimately have to be considered. What are the required winter river flows to sustain environmental interests?</p> <p>Importation of water could have implications for the quality of recipient watercourses.</p>	<p>All winter abstraction licences contain cessation clauses which restrict abstraction to periods of high flow.</p> <p>The 'In River Needs' studies should address river flow requirements for environmental needs.</p> <p>Agree that the importation of water changes recipient water courses. This aspect should be addressed when promoting any such scheme.</p>
Cambs County Council (12/5/98)	<p>Whilst the Council supports the option of storage of water in winter, it does have concerns about the encouragement of winter storage reservoirs, especially large jointly-owned reservoirs. These can involve the excavation of substantial amounts of material, and in particular gravel. The minerals local plan would have to be taken into account, as MPG6 advises the need to conserve finite aggregate mineral reserves.</p> <p>The Agency should include in its guidance to farmers on winter water reservoirs (in conjunction with the Countryside Commission and ADAS) the need to check whether planning permission is required in order to carry out such schemes. Recent Drought order applications, made by Anglian Water, have resulted in environmental impact studies being undertaken for the Great Ouse and Nene. It is suggested that the Agency could usefully extend such research and assess the potential environmental impact of winter water abstraction on all habitats.</p> <p>Concerned about future growth and development possibilities and the associated water resources implications. It may be helpful if meetings involving the Agency, water companies, county and district Council officers were arranged in order to develop greater understanding of these issues. Measures which conserve groundwater resources and reduce the amount of water consumed are to be welcomed and supported. However, with metering any pricing structure should not result in adverse effects on health.</p>	<p>Noted.</p> <p>We advise farmers to apply for planning permission and send out the leaflet issued by MAFF 'Winter Storage Reservoirs' (1996, ref PB2512 obtainable from MAFF 0645-556000).</p> <p>Noted. The abstraction licence applicant is required to carry out the environmental impact study following our guidance.</p> <p>Agreed. The Agency already meets with the County Council. Additional meetings could be of benefit.</p> <p>The pricing structure is a matter for the Water Companies and OFWAT.</p>

Consultee (Date)	Comment	Response
Herts County Council (16/6/98)	As the need for closer integration between planning and water supply functions has been the subject of recent debate at national level, this would be an appropriate place to draw attention to it. Such issues will be an important element of the decision-making processes in the imminent review of Hertfordshire's district Local Plans following the adoption of a new Structure Plan for the County. In the disadvantages column, reference should be made of the environmental consequences of options, such as reservoir development and cross-catchment transfers. Reducing demand contributes to ensuring the most efficient use of a limited resource and should be a priority. There should be a review of all options, including some form of cost benefit analysis.	Noted.
FRCA (7/5/98)	A key element of irrigation for crops such as potatoes particularly in the fen areas of the catchment is the maintenance of the quality required by the consumer. Therefore the need to maximise available resources through storage and targeted use of water are important means of ensuring supply.	Noted.

Issue 3: Concerns That Flows in River Cam Are Not Adequate to Meet 'In River Needs'.

Consultee (Date)	Comment	Response
Waterbeach Angling Club (21/10/97)	The suggestion of an upstream reservoir to hold water in the winter months was made so that summer could be augmented. This seems an expensive option but bearing in mind the real problem of abstraction of water from the upper reaches, seems to be the only alternative. The Club's understanding is that the springs feeding the upper river scheme have dried up. The Club is concerned that the minimum flow rates down the River Cam are at such a critical level. This year there was virtually nil flow in the upper reaches of the river above Newnham illustrated by a tremendous growth of duck weed which spread completely across the river. This was the first time that committee members had seen this. The growth extended right through the centre of Cambridge down into the lower reaches as far as Baits Bite Lock.	The support of flow in the River Cam has been identified as issue 3.

Consultee (Date)	Comment	Response
CRC (10/2/98)	Support the investigation into 'In River Needs'	Noted.
IWA(Cambs) (24/3/98)	The use of boreholes to augment river flows is questioned but appreciate that river life has been saved during drought years.	Noted.
CMBC (12/4/98)	Agree that it is essential to support the river environment but question the increase in use of bore water to maintain the flow. Comment is passed without knowledge of resource but concern that they are finite.	Noted.
T. Legge (28/3/98)	Would the support scheme result in water significantly colder than the river temperature being discharged, and what time of year would it operate?	If a support scheme was installed, the borehole water would be colder during the summer, maybe warmer in the winter. The scheme would operate in periods of low flow (mostly summers).
English Nature (27/4/98)	Will the 'In River's Need' study address the needs of SSSIs and County Wildlife Sites that are dependant on the rivers and its flows? EN seek assurance that such sites are fully considered as part of such an investigation.	Yes, the study would address these if sites are dependant on river flow/level.
Cambs and Isle of Ely Federation of Anglers (28/4/98)	Low flows are a major concern as the River Cam depends on the flows to dilute the emissions from the Cambridge sewage works. Support the intention to carry out investigations into river flows.	Noted.
Cambs County Council (12/5/98)	The use of river support schemes in order to maintain habitats is generally supported and options to review operations and carry out studies are welcomed. In times of drought it is vital that public awareness is raised concerning all aspects of water transfer and regarding the impact of continued abstraction on river flows and groundwater resources.	Noted.
S.P. Sawkins (16/2/98)	As a keen angler who enjoys fishing the rivers Rhee and Cam, he has concerns about the low flows and low level of water particularly in the summer months.	Noted.
Ciba Specialty Chemicals PLC (30/4/98)	Perceive links with issue 17.	There are links between Issue 3 and Issue 17. We accept that the discharge made by Ciba is a valuable contribution to river flows, and the 'In River Needs' study mentioned in this issue may confirm this.
Herts County Council (16/6/98)	(And issue 11) The 'Do nothing' option has 'cost as an advantage. Should this read 'no cost'?	Many of the 'do nothing' options have cost as an advantage and by this we do mean no (further) cost.

Issue 4: Concern That the Operation of Rhee Support Scheme is Not Ideal

Consultee (Date)	Comment	Response
IWA(Cambs) (24/3/98)	(And issue 5) The use of boreholes to augment river flows is questioned but appreciate that during drought years the life of the river and lodes have been saved by this scheme.	See comments to issue 3.
CMBC (12/4/98)	(And issue 5) Agree that it is essential to support the river environment but question the increase in use of bore water to maintain the flow. Comment is passed without knowledge of resource but concern that they are finite.	See comments to issue 3.
RSPB (1/5/98)	Support the acknowledgement that water abstraction is having an effect upon wetlands within the catchment area. Support the first option, but recommend the implementation of a monitoring programme to assess impact at Fowlmere.	Noted.
English Nature (27/4/98)	This issue is of concern. Borehole at Slip End (outside boundary) has a major influence on the River Rhee and Ashwell Springs SSSI. On page 81 this is described as a water transfer borehole but it is also used for public supply. 'In River Needs' study to consider the need of dependant SSSIs. Review the scheme as it effects Fowlmere Watercress Beds with EN and RSPB.	Noted. The Water Level Management Plan for Fowlmere has acted as a focus to review the support scheme at this site.
Andrew Lansley House of Commons (23/4/98)	The RSPB reserve at Fowlmere has difficulty in accessing spring-fed water. Does this also give rise to an issue of supply?	The site is augmented by borehole water to compensate for the loss of spring flow with moderate success. The Water Level Management Plan has been produced to highlight the outstanding issues for this site.
Cambs County Council (12/5/98)	The use of river support schemes in order to maintain habitats is generally supported and options to review operations and carry out studies are welcomed. In times of drought it is vital that public awareness is raised concerning all aspects of water transfer and regarding the impact of continued abstraction on river flows and groundwater resources.	Noted.

Issue 5: Concern That the Lodes Granta Scheme is Not Ideal

Consultee (Date)	Comment	Response
Anglian Water Services Ltd. (5/5/98)	AWSL asked to increase the abstraction licence for Westoe Farm borehole for the winter months only. This would be used in conjunction with boreholes in the Upper Stour catchment to increase the output to Haverhill. Please take this into account when reviewing the operation of the Lodes Granta Scheme.	Noted.
English Nature (27/04/98)	Support the review of the Lodes Granta Scheme.	Noted.
Cambs County Council (12/5/98)	The use of river support schemes in order to maintain habitats is generally supported and options to review operations and carry out studies are welcomed. In times of drought it is vital that public awareness is raised concerning all aspects of water transfer and regarding the impact of continued abstraction on river flows and groundwater resources.	Noted.

Issue 6: There is A Need to Assess and Where Appropriate Protect the Ecological Status of Headwaters

Consultee (Date)	Comment	Response
RSPB (1/5/98)	We support the acknowledgement that further studies of the ecology of headwaters are needed.	Noted.
English Nature (27/4/98)	Supports the need to protect the headwaters of various rivers within this area. Urge Agency to act now where there is a site of known ecological importance, eg, Hertfordshire springs.	Noted.
RSPB (1/5/98)	Option 2 should be amended to 'Identify and implement a strategy'	Noted and brought forward into Action Plan
Cambs County Council (12/5/98)	Options to fulfil conservation duties and protect riverine biodiversity are welcomed and are in keeping with the Council's Structure Plan Environmental Sustainability Target TR3 and Environment 2000 Action WA/A3.	Noted.
South Cambs District Council (5/5/98)	The Council supports the active options for this issue.	Noted.

Consultee (Date)	Comment	Response
Wildlife Trust (30/6/98)	The Agency has a responsibility to inform itself about species and habitats of conservation concern that are likely to be affected by its activities. There is, in addition, a more widespread need for improved access to data on species and habitats of conservation value. These issues are not adequately dealt with under issue 6.	The Agency supports the Biological Records Centre Partnership Project which is being lead by the County Council. In the meantime Anglian Region's Rivers Environmental Database is accessible for environmental information associated with main river.

Issue 7: There is A Lack of Habitat Diversity Both Within the Rivers and Their Floodplains

Consultee (Date)	Comment	Response
Cambridge Autumn Regatta (2/2/98)	The biodiversity of the Stourport Common area would be increased if the 'Millennium Cut' were to go ahead.	Noted.
3.3 (24) RSPB (1/5/98)	Supports the options identified and suggest additional options be added: i) Agency's commitment to the production and implementation of the Cambridgeshire BAP. ii) Sympathetic management of rivers and streams for flood defence iii) Soft engineering for flood defence works can be used to create valuable wildlife habitats.	The Agency's support to this process is implicit in Section Four. Noted. Noted.
Cambridge Preservation Society (5/5/98)	River Biodiversity should be given priority particularly as there is a continuing pressure to develop along river valleys, despite attempts to re-direct development in development plans. Society believes the Agency has a duty to raise the profile of this issue together with other agencies, eg, English Nature.	The Agency has a policy and practice for the protection of floodplain capacity in flood defence environmental and other aspects within the Agency's remit. However, the final arbiter with regard to development in the floodplains remains the Town and Country Planning Act system.
Waterbeach Angling Club (21/10/97)	Habitat improvement is also a concern of the Club, who extend their angling interests to the bottom end of Bottisham Lode and to the full length of Swaffham Lode, as these areas are the most important breeding areas to replenish the fish stocks within the scheme. The continued use of metal or unibank piling of the river banks has resulted in a huge loss in the number of water birds and voles as well as a loss of small shallow areas where fish can effectively breed and shelter making the spawning sites previously identified even more important.	The Agency is liaising closely with the Angling Club regarding our recent fish population survey of the Lodes, about the future management of the fishery.

Consultee (Date)	Comment	Response
English Nature (27/4/98)	Supports the option for enhancing habitats within rivers and floodplains. Agency can achieve this through BAP targets. Linked with this issue is the need to have strategic view of the Agency's maintenance programmes, eg, floodbank maintenance should be fully assessed in term of timing, machinery, grazing etc. Add to list of options.	Noted. The Agency supports the need for a strategic approach to all maintenance of floodbanks and will strive to achieve this goal in partnership with all interested parties.
Cambs County Council (12/5/98)	Options to fulfil conservation duties and protect riverine biodiversity are welcomed and are in keeping with the Council's Structure Plan Environmental Sustainability Target TR3 and Environment 2000 Action WA/A3. However, it is suggested that a similar option to that for Issue 9, ie review opportunities for wetland restoration when undertaking other core functions activities (eg flood defence operation) could be included.	The Agency look to realise habitat enhancement and restoration opportunities where ever possible but it is at times the case that these 2 requirements are often contradictory.
Wildlife Trust (30/6/98)	The Agency has a responsibility to inform itself about species and habitats of conservation concern that are likely to be affected by its activities. There is, in addition, a more widespread need for improved access to data on species and habitats of conservation value. These issues are not adequately dealt with under in issue 7.	
South Cambs District Council (5/5/98)	The Council supports the active options for this issue.	Noted.

Issue 8: Extent of Spread of Invasive Plants is Unknown and Therefore of Concern

Consultee (Date)	Comment	Response
IWA(Cambs) (24/3/98)	The first two options must be maintained	Noted.
CMBC (12/4/98)	Failure to maintain the first two options will affect the native flora and erode the banks.	Noted.
RSPB (1/5/98)	Recommend that this issue is expanded to cover the spread of invasive animals, particularly signal crawfish and mink.	The control of these species should be addressed via the BAP processes and as such are not identified in LEAPs.

Consultee (Date)	Comment	Response
IWA (Head Office) (28/4/98)	Support options 1 and 2 and urge that the 'Do nothing' option is rejected. Concern that boating may be seen as the cause of erosion of the banks, whereas it is in fact due to invasive plants. Suggest development of uncultivated strips of land beside watercourses following eradication of invasive species to help stabilise riverbanks, provide buffer to agricultural pollution and benefit habitat diversity.	Noted.
English Nature (27/4/98)	Support this issue and the options put forward.	Noted.
Cambs County Council (12/5/98)	Evaluation of methods of control and of successful eradication are vital if the spread of invasive plants is to be cost effective. It may also be necessary to examine existing practices which could be encouraging the spread of such species.	Noted.
Wildlife Trust (30/6/98)	The Trust does not support option 2 until they have had the opportunity to evaluate the results of option 1.	The Agency is fully committed to addressing this issue in partnership.

Issue 9: Public Access for Recreational Activities Needs to Be Improved

Consultee (Date)	Comment	Response
CLA (27/2/98)	Agency should enter into voluntary agreements with landowners in order to provide more upriver footpaths. (CLA's Access 2000 Initiative seeks to improve access as much as possible.)	Agency attending twice yearly Countryside Access Forums to discuss access issues.
IWA(Cambs) (24/3/98)	Continuing need for this option to be carried out.	Noted.
Cambridge Autumn Regatta (2/2/98)	Access could be improved to the river in the Stourbridge Common area if the proposed 'Millennium Cut' were to go ahead. (Proposal for a possible development to run from the end of Riverside to 'Ditton Corner', to give another 1500 metres of water, effectively doubling the amount of usable river between Jesus Lock and Baitsbite Lock.)	Noted.
CMBC (12/4/98)	If good access is not provided there is a strong possibility that people will seek illegal access causing environmental damage.	Noted.

Consultee (Date)	Comment	Response
IWA (Head Office) (28/4/98)	Pleased to see this issue in the LEAP. If landowners permit access to private stretches of riverbank, the public must show respect for such land. Erect signs to inform public and urge responsible behaviour. Urge the Agency with local authorities to improve access as continuous footpaths along river corridors are a valuable recreational resource.	Noted.
IWA (Head Office) (28/4/98)	General - IWA believes that the full re-opening of the Lodes along the Cam would increase time spent in the area by waterborne visitors and thus increase tourism income as well as being an attractive and valuable local amenity. Swaffham Bulbeck Lode - IWA would welcome the full reinstatement of the entrance gates and re-opening of the Lode to boats from the Cam. Other than a small number of obstructions the Lode would appear to be navigable up to Cow Bridge subject to limited dredging and the provision of a winding hole. Obstructions which could be easily raised are the bridge over Swaffham Lock chamber as well as two footbridges and a pipeline. Bottisham Lode - A conventional lock would be needed in order to create increased depth up to Bottisham village and the staunch would require rebuilding. Other work such as the provision of adequate headroom under bridges and provision of a winding hole would also be required.	Swaffham Bulbeck and Bottisham Lodes are not statutory navigations under the Anglian Water Authority Act 1977. The Agency has limited resources to promote the re-opening of old navigations and indeed struggles to maintain navigation on its statutory navigations. Reinstatement of navigation on Swaffham Bulbeck and Bottisham Lodes would be subject to feasibility studies and full environmental impact studies in the first instance.
CPRE (4/5/98)	This issue fairly low on list of priorities. The more this is improved the greater the risk of damage to the natural environment.	Noted.
Cambridge Preservation Society (5/5/98)	(And issue 10) Policies should be environmentally sound first and provide for enjoyment second. Otherwise risk damage to the river which removes the capacity for proper public enjoyment.	Noted.
English Nature (27/4/98)	There may be situations in which it is not advisable to increase recreational activity because of the sensitivity of the area concerned (protected species).	Noted.
GOBA (24/4/98)	Support the widest possible access to the river and riverside environment, its preservation and conservation.	Noted.

Consultee (Date)	Comment	Response
Cambs and Isle of Ely Federation of Anglers (28/4/98)	Concerned that the weed growth on the banks of the Lodes was so dense last year that it was difficult for anglers and ramblers to walk along there.	Banks are mowed 3 times a year (April, July and September). No mowing May or June to protect nesting birds. Banks are mowed for flood defence purposes.
Cambs County Council (12/5/98)	Increased access and enhanced river banks are supported, as are opportunities to increase access for horses, though it is acknowledged that horse riding does in some instances cause the Agency concern.	Noted.
Cambs County Council (12/5/98)	<p>The County Council welcomes the Agency's support for improving access at particular points along watercourses for people of limited mobility, and in particular would welcome access points with interpretation boards.</p> <p>Consultation by the Agency regarding dredging and bank cutting programmes is of great assistance to the County Council in helping avoid obstruction of Rights of Way. The Council's Countryside Access Team would also welcome liaison on major flood defence programmes and bridge replacement work. It also suggests that the Agency may like to consider creation of fords and to continue to replace stiles with gates wherever possible in their work programmes.</p>	<p>Noted.</p> <p>The Agency will include the Council's Countryside Access Team in the consultation process regarding work programmes and major flood defence programmes. Where the Agency controls and owns property we will continue to repair/replace existing stiles and will consider constructing gates where there are no grazing issues.</p>

Issue 10: Moorings and Lack of Pump-out Facilities in Cambridge

Consultee (Date)	Comment	Response
IWA(Cambs) (24/3/98)	Encouragement of Marinas, Boat Clubs etc to provide facilities for boaters should be an ongoing action.	Noted.
CRC (2/10/98)	While it is true that the Conservators have been involved in the pump-out facility and have initiated relevant discussions it is, in fact incorrect to say that we are taking the lead. We do not have statutory duty to make this provision. In fact it is the City Council which is pushing this.	Noted. The Agency is happy to contribute to this project - increasing facilities on River Cam for boaters.

Consultee (Date)	Comment	Response
Waterbeach Angling Club (28/10/97)	Water quality problems are aggravated by waste products from Marinas at Shrubs and Coles Farms where no sewage facilities are provided. We would urge the authority to, if necessary, assist the Marina owners to provide these facilities. We are particularly concerned that the mooring of boats within the river itself has taken place at Coles Marina and on at least two occasions in recent years Club members have reported the pumping of bilges directly into the river from the latter Marina. If moorings were restricted to within the Marina basin, then at least a bund could be provided at the connection joint to prevent the pollution spreading into the river.	The Agency does not have the resources to assist marinas to provide sewage facilities. We have contributed to pump-out facilities at Jesus Green which is within travelling distance of the Marina. There are no bye-laws to prevent holding (sewage) being pumped out into the river.
CMBC (12/4/98)	Essential for pump-out facilities to be provided. Jesus Lock facility to be completed ASAP. Concern over the lack of restricted visitors moorings between Jesus Lock and Victoria Pool and this space being used by a large number of permanent 'live aboard' boats. Marinas and riverside businesses should be encouraged to provide moorings.	Agency contributing £5K to Cambs CC and Conservators of the River Cam for pump-out facility at Jesus Green which will be completed shortly. The Agency is not the Navigation Authority for this stretch of river and therefore has no powers over moorings. Noted.
GOBA (24/4/98)	Concern over the number of permanently moored boats in the Cambridge area. Problems with potential impact on local water quality, and they spoil the visual environment. Pressure should be put on Cam Conservators.	Noted.
IWA (Head Office) (28/4/98).	Would welcome the opportunity to contribute to the resolution of the issue of permanent moorings in Cambridge. How are Cam Conservators addressing the issue of increased permanently moored boats? Welcome the Agency's proposal to help fund pump-out facility at Jesus Green. Adequate pump-out facilities are important for the health and comfort of boaters though a shortage of them would not automatically lead to water quality or odour problems in the area.	Mooring to be reconsidered by appropriate City Committee. Noted. Agency contributing £5K. Noted.

Consultee (Date)	Comment	Response
Cambs and Isle of Ely Federation of Anglers (28/4/98)	<p>The pump-out facilities are welcome, though further moorings are less welcome. Reference should be made to recent Cambridge City Conservators assessment of the situation and their plans for mooring.</p> <p>Moored boats can be very dangerous considering the amount of rowing that takes place in Cambridge.</p>	<p>Noted.</p> <p>Mooring in certain areas is being considered by the appropriate city committee(s). The Conservators of the River Cam have no control over the mooring of the craft provided byelaws are being complied with.</p> <p>Noted.</p>
Cambs County (12/5/98)	<p>The provision of pump-out facilities at Jesus Green would appear to be in hand and this is supported.</p> <p>The disadvantages of the 'do nothing' option are not clear as this options does not include any mention of how permanent moorings are controlled.</p>	<p>Noted.</p> <p>The Agency is not the Navigation Authority for this stretch of river.</p>

Issue 11: Illegal Disposal of Commercial, Industrial and Domestic Waste

Consultee (Data)	Comment	Response
Utlesford District Council (28/1/98)	Definitions are needed to explain where litter (Environmental Health) ends and fly-tipping (Environment Agency) begins.	The Agency has a draft fly-tipping matrix which differentiates between litter and small scale non-hazardous fly-tipping (local authority) and larger scale non-hazardous and all hazardous fly-tipping (Agency). The Agency will investigate the latter and assist local authorities as appropriate in the enforcement of the former.
Cambridge Preservation Society (5/5/98)	Policies on preventing pollution are vital and the planning system should ensure new development is located where there is no risk of polluting watercourses. Need to be promoted as 'material considerations' within land use planning and Agency should be taking a stronger lead.	The Agency does promote policies to ensure development is carried out in a sustainable manner through Development Plans and through suggesting appropriate conditions on planning permissions.

Consultee (Data)	Comment	Response
Tidy Britain Group (5/5/98)	<p>Fly-tipping and enforcement of environmental legislation are problem areas that are frequently brought to the attention of this group. In some areas there is a lot of communication among organisations that have relevant environmental enforcement powers. However, in many areas these organisations are not co-ordinated in any way. This leads to 'small' scale fly-tipping in many areas which, overall, has a large and potentially damaging effect.</p> <p>A co-ordinated approach such as the 'Considerate Carrier Scheme' in Thurrock (with Council, Customs and Excise, Police and Environment Agency staff involvement) would be of benefit to everyone involved.</p>	<p>Agree that a coordinated response by interested parties to fly-tipping would be useful. However, such schemes to counter fly-tipping need to be focused; if the remit is broad then these initiatives tend to fail.</p>
Cambs County Council (12/5/98)	<p>The County Council is concerned by the apparent increase in fly-tipping, possibly associated with the introduction of the landfill tax and increased waste disposal costs.</p> <p>The Agency should acknowledge that they have a responsibility together with Waste Disposal, Waste Collection and Waste Planning Authorities to take action.</p> <p>An integrated approach to deal with these problems is supported. Options for education campaigns are supported.</p> <p>It is felt that fly-tipping requires stronger enforcement and heavier penalties.</p>	<p>Noted.</p> <p>Noted.</p> <p>All initiatives, including education campaigns, to reduce fly-tipping are supported by the Agency.</p> <p>The severity of penalty imposed for fly-tipping offences is decided by the courts. Currently a maximum fine of £20K and/or 6 months imprisonment can be imposed by the magistrates and on indictment and unlimited fine and up to 2 years imprisonment.</p>

Issue 12: Burning of BSE Infected Cattle At Vetspeed

Consultee (Data)	Comment	Response
Cambridge Preservation Society (5/5/98)	<p>Policies on preventing pollution are vital and the planning system should ensure new development is located where there is no risk of polluting watercourses. Need to be promoted as 'material considerations' within land use planning and Agency should be taking a stronger lead.</p>	<p>The objective of the Agency in this case is the prevention of pollution and hence is in accord with the comment made. New development on the site is considered in the context of discharges to all media including water.</p>

Consultee (Date)	Comment	Response
Cambs County Council (12/5/98)	Options to continue to require Vetspeed to upgrade equipment and improve operating procedures together with the Implementation of the House of Commons recommendations are welcomed and should be implemented at the earliest possible opportunities.	Vetspeed continue to upgrade equipment, etc, as a requirement of the IPC authorisation. This will be continued in the context of the principles of BATNEEC and BPEO in the future.

Issue 13: Burning of Secondary Liquid Fuels (SLF) at Barrington Cement Works

Consultee (Date)	Comment	Response
Andrew Lansley MP House of Commons (23/4/98)	Supports the House of Commons Environment Committee's recommendations on this issue. Detailed text needs to bring out issues such as proportion of SLFs, monitoring requirements, data analysis etc.	As a national policy the Agency is committed to the implementation of the recommendations of the House of Commons Environment Committee and these will therefore be implemented as appropriate.
Cambridge Preservation Society (5/5/98)	Policies on preventing pollution are vital and the planning system should ensure new development is located where there is no risk of polluting watercourses. Need to be promoted as 'material considerations' within land use planning and Agency should be taking a stronger lead.	
CPRE (4/5/98)	Urge that the recommendations of the House of Commons on the use of SLF be implemented without delay.	
Cambs County Council (12/5/98)	Support proposals by the Agency to improve consultation procedures and the wider publicity to be given to applications for trial burns and continuous burning of substitute fuels at cement and lime kilns. Raising awareness together with provision of additional information on these potentially contentious applications and processes will help increase knowledge and understanding, especially with regards to health related issues. The County Council, as Waste Planning Authority, would welcome the opportunity to become statutory consultees on applications for authorisations for incinerators/kilns for waste to energy plants.	Currently the relationship between the Planning Authority and the Agency is defined in the Government publication PPG23. Local authorities have recently been made statutory consultees on IPC applications and the view of the County Council is noted regarding their status in this consultation process. However, as a result of the proposed Agency policy for extended public consultation for certain IPC processes the County Council will be consulted in these particular cases. Incineration/waste to energy plant applications have a high probability of being selected for the extended consultation process.

Issue 14: East Anglian Cement Ltd Shepreth (LS 4) - Impact on Groundwater

Consultee (Date)	Comment	Response
Cambridge Preservation Society (5/5/98)	Policies on preventing pollution are vital and the planning system should ensure new development is located where there is no risk of polluting watercourses. Need to be promoted as 'material considerations' within land use planning and Agency should be taking a stronger lead.	If new development is proposed in a location that carries a risk of polluting a controlled water then the Agency uses its own policies and powers, and as a statutory consultee seeks to influence the policies and decisions under planning legislation to protect controlled waters from pollution.
English Nature (27/4/98)	What impact does the contamination of chalk aquifer by landfill leachate have on nearby SSSI and is there likely to be a problem in the future? Welcome the installation of further monitoring boreholes and risk assessment.	There are two SSSIs nearby, one is upstream of the contaminated aquifer and the other is on the other side of the river, there is no evidence to suggest that they have been affected by the contamination.

Issue 15: Groundwater at Eastern Counties Leather, Sawston, Contaminated with Chlorinated Solvents

Consultee (Date)	Comment	Response
Cambridge Preservation Society (5/5/98)	Policies on preventing pollution are vital and the planning system should ensure new development is located where there is no risk of polluting watercourses. Need to be promoted as 'material considerations' within land use planning and Agency should be taking a stronger lead.	If new development is proposed in a location that carries a risk of polluting a controlled water then the Agency as a statutory consultee (and using its policies and powers) seeks to influence the policies and decisions under planning legislation to protect controlled waters from pollution.
English Nature (27/4/98)	Does this pollution impact upon the nearby SSSI? Support containment put forward.	There is no evidence to suggest that there is a pollution impact on the nearby SSSI.
AWSL (5/5/98)	Westoe Farm Borehole is not operated due to Groundwater Pollution by Organic Solvents. Can this be included as an issue as Eastern Counties Leather is included as an issue.	This issue has not been taken forward as a separate issue in the Action Plan and will be included in issue 'The Identification and Remediation of Contaminated Land'.

Issue 16: Unsewered Areas

Consultee (Date)	Comment	Response
Utlesford District Council (28/1/98)	The Council are willing to share the information they have about pollution and nuisance incidents associated with rural drainage.	Noted.

Consultee (Date)	Comment	Response
CPRE (4/5/98)	The Agency should not encourage the extension of the sewerage system as this would open up hamlets and villages to residential development pressures.	The Agency acts as an intermediary between Water Companies, local councils and residents providing environmental data if required for decisions on unsewered areas. Through its role as statutory consultee to local planning authorities the Agency seeks to discourage the proliferation of private sewage facilities.
AWSL (5/5/98)	Have already responded to a request for first time rural sewerage in the plan area for the village of Arkesden. It has been approved. No other applications have been received.	Noted.
CLA (27/2/98)	Need to address the problem of isolated farms and houses, some over a mile from the nearest sewage works.	The Agency is aware of this problem. It is unlikely that mains foul sewerage will become available for these sites. If septic tanks/soakaways are not appropriate then one of the small treatment plants may be used. This will require a formal consent from the Agency.
Cambridge Preservation Society (5/5/98)	Policies on preventing pollution are vital and the planning system should ensure new development is located where there is no risk of polluting watercourses. Need to be promoted as 'material considerations' within land use planning and Agency should be taking a stronger lead.	If new development is proposed in a location that carries a risk of polluting a controlled water then the Agency as a statutory consultee (and using its policies and powers) seeks to influence the policies and decisions under planning legislation to protect controlled waters from pollution.
English Nature (27/4/98)	No wetland SSSIs are known to be directly affected by pollution from domestic sewerage, some features of local importance may be affected. Welcomes the installation of first time sewage. Appropriately treated effluent could help to support river flows in some instances.	Consent Conditions are set to ensure that water quality and the local environment are protected. EN are consulted if a SSSI is likely to be affect.

Issue 17: Impact of Closure of Formaldehyde Production

Consultee (Date)	Comment	Response
Ciba Specialty Chemicals (30/4/98)	Recommend that the 'Do Nothing' option is taken up, in order to continue the 'good working relationship with industry' outlined in the Agency's Aim 9. Option 1 would also entail additional cost in financial and environmental terms by using alternative cooling methods.	After consideration it has been decided that this issue will be dealt with more appropriately under the 2 issues titled 'Concern that flows in the River Cam are not adequate to meet In River Needs' and 'Identification and Remediation of Contaminated Land'. This is therefore no longer a separate issue.

Consultee (Date)	Comment	Response
English Nature (27/4/98)	Need to carry out an assessment of the implications of the Company reducing the abstraction and thus augmenting Cam flows. Implications of such actions on features of nature conservation value are fully assessed.	After consideration it has been decided that this issue will be dealt with more appropriately under the 2 issues titled 'Concern that flows in the River Cam are not adequate to meet In River Needs' and 'Identification and Remediation of Contaminated Land'. This is therefore no longer a separate issue.
Cambridge Preservation Society (5/5/98)	Policies on preventing pollution are vital and the planning system should ensure new development is located where there is no risk of polluting watercourses. Need to be promoted as 'material considerations' within land use planning and Agency should be taking a stronger lead.	

Issue 18: Identification and Remediation of Contaminated Land

Consultee (Date)	Comment	Response
UDC (28/1/98)	Urgent need for guidance on levels and procedures, especially with regard to development of brownfield sites.	The issue of identification of contaminated land sites hinges on forthcoming regulations and once these are established the Agency will be able to offer further advice. However, at the present time a series of industry guidelines for development of contaminated land exists: 'Interdepartmental Committee on the Redevelopment of Contaminated Land' and 'Interim Guidance on the Disposal of Contaminated Soils'.
CPRE (4/5/98)	Vitally important to identify and clean up contaminated land as this could be reused for development instead of Greenfield sites.	Noted.
Cambridge Preservation Society (5/5/98)	Policies on preventing pollution are vital and the planning system should ensure new development is located where there is no risk of polluting watercourses. Need to be promoted as 'material considerations' within land use planning and Agency should be taking a stronger lead.	Noted. If new development is proposed in a location that carries a risk of polluting a controlled water then the Agency as a statutory consultee (and using its own policies and powers) seeks to influence the policies and decisions under planning legislation to protect controlled waters from pollution.
Cambs County Council (12/5/98)	Options to identify and clean up contaminated land are supported. Remediation of contaminated land may enable development to take place which is in line with government policy to encourage the use of brown-field sites.	Noted.

Consultee (Date)	Comment	Response
South Cambs District Council (19/5/98)	The report gives no indication as to the current status of Ministry of Defence land in terms of contamination. The Council feels that such areas have been responsible for contamination in the past.	One of the options in the consultation report is to liaise with the local authority to identify contaminated land and determine remediation measures. The current status of Ministry of Defence land in terms of contamination would be included in this liaison and the Agency would welcome any information that the Council have to show that areas such as Imperial War Museum at Duxford, Waterbeach and Oakington have been responsible for contamination in the past.
South Cambs District Council (19/5/98)	The Council welcomes the statement that the Agency will work with local authorities to identify and remediate contaminated land outside the planning legislation where there are already in existence well tried methods of control.	Noted.
AgrEvo (30/4/98)	Is the stated option 'cause polluters to clean up contaminated land' within the scope of the Agency's powers? Statements for this option need development in order to explain where such obligations upon landowners are referred to in law.	The Agency's powers allow it to cause polluters to 'clean up' contaminated land on the short-term basis, ie, fly-tipping or pollution incidents. However, with long-term contaminated land the Agency's actual powers will not be defined until after the regulations are available, but the Agency will also look to advise and work in partnership by advising local authorities, industry and land owners to identify and remediate contaminated land.

Issue 19: Ascertain the River Maintenance Needs in Cambridge

Consultee (Date)	Comment	Response
IWA Cambs (24/3/98)	Silting and the rise of bed levels is of concern. 'In River Needs' and water flows are part of this problem.	Early indications are that limited dredging may be required. Final consultants report will form part of the LEAP process.
CMBC (12/4/98)	This issue causes great concern, in particular silting with subsequent rise in bed levels. River flows aggravated by excessive water extraction appears to be a major problem.	
IWA (Head Office) (28/4/98)	Urge Agency to take measures to ensure safe navigation where it has this duty, and to co-operate with the Cam Conservators to this end whilst undertaking its flood protection duties.	

Consultee (Date)	Comment	Response
Cambridge Autumn Regatta (2/2/98)	If the Millennium Cut were to go ahead it would avoid the need for dredging the stretch of river from Riverside to Ditton Corner.	Proposed Millennium Cut would have significant impact on the area and would need a full environmental assessment. There would be no significant Flood Defence benefit and may exacerbate the siltation in the main river.
Cambs and Isle of Ely Federation of Anglers (28/4/98)	The amount of silt in the River Cam is a problem and will have to be examined to determine the effect its removal will have on river quality.	An environmental assessment will be undertaken prior to any works being commenced.
South Cambs District Council (19/5/98)	The Council considers that any desilting operation should take into account the possible deteriorating effect on any headwaters and the effects of the site on the land where it is deposited and the minimisation of local disturbance from odour during desilting.	An environmental assessment will be carried out prior to any proposed desilting including local consultation.

Issue 20: Options for the Transport and Disposal of River Dredgings

Consultee (Date)	Comment	Response
CRC (10/2/98)	The Conservators would welcome dredging of the River, as this would improve navigability.	Early indications are that limited dredging may be required. Final consultants report will form part of the LEAP process.
IWA Cambs (24/3/98)	Suggest use of water transport to move dredgings.	Preliminary assessment of working methods for any dredging has already identified the need to transport spoil by barge.
IWA(Head Office) (28/4/98)	Do nothing option is not justifiable. Suggest use of water transport to move dredgings to a suitable location. Dewatering/holding lagoons may be sited sensitively and screened with trees. Again dredgings could be transported by boat.	
CMBC (12/4/98)	Suggest use of water transport to move dredgings. The use of river banks may mean a short-term disruption to amenity value, this may be a small price to pay for long-term benefit.	
Cambridge Autumn Regatta (2/2/98)	Silt from dredging the river could be incorporated into landscaping the Millennium Cut. Could the silt not also be used in the formation of flood prevention measures.	Proposed Millennium Cut would have significant impact on the area and would need a full environmental assessment. There would be no significant Flood Defence benefit and may exacerbate the siltation in the main river.

Consultee (Date)	Comment	Response
Cambs County Council (12/5/98)	The Cam has a number of sensitive areas adjacent to the river. It may be appropriate to consider remote disposal of dredgings in some instances. Disposal should be at a licensed disposal site. There is also the potential of direct impact from desilting and dredging operations on important archaeological remains in this area.	An environmental assessment will be carried out prior to any proposed dredging including local consultation.

Issue 21: Monitoring of the Local Impact of Processes Using Radioactive Materials

Consultee (Date)	Comment	Response
South Cambs District Council (19/5/98)	The need to assess the cumulative impact of the radioactive sources is welcomed and the risk to public health should be quantified more so than the costs aspect.	The point that public health considerations should not be compromised by the cost aspects of any survey is accepted and will be applied within the budgetary constraints of the Agency.

New Issue: Endocrine disrupting chemicals in the environment (Wildlife Trust)

Comment	Response
Endocrine disrupting chemicals in the environment are of increasing concern to the Wildlife Trusts. It is increasingly obvious that natural systems are being affected by these chemicals, but as new chemicals come into use, environmental testing and the establishment of adequate new testing protocols lag behind. Possible long-term risks are so grave that it is essential that the Environment Agency takes the lead in investigation and activity, and indeed informing and raising awareness.	The Wildlife Trust were involved in the consultation process for the document entitled 'Endocrine Disruptors: What Should Be Done?' The Agency received favourable feedback from the Wildlife Trust and other conservation bodies. The National Strategy is expected to be launched in early 1999, once this has been finalised, endocrine disrupting chemicals may, if relevant, be included in individual LEAPs. A copy of the consultation document responses is available on request.

Table 3: Feedback

The following table describes (in page order) the feedback received.

This does not include revisions to the issues themselves which are listed in Table(s) 2 above.

General comments are as follows:

- Cam Conservators should properly be known as 'Conservators of the River Cam'.
- UDC feel that air quality should be given a higher profile.
- Cambridge Preservation Society - 'report well presented (graphically) but would benefit from a clearer statement of the principles which it seeks to promote. In the long-term there has to be better water management and more comprehensive planning

if the rivers are to be save guarded.

- The Agency should consider socio-economic and health issues when producing LEAPs.
- The production of this LEAP will increase understanding and help balance conflicting interests and demands.
- It would be helpful if the objectives and targets section appeared before the issues and options section, in order to enable a clear relationship to be made.
- Section 1 could usefully be expanded to cover the inter-relationships of the Agency with other organisations.
- A reference to the chemical industry could usefully be made in Section 2 describing the Cam area.
- The character area table (Table 1) could also provide a framework for management and enhancement.
- The report is welcomed as establishing a benchmark and a priority list for environmental improvements in the area under review.
- While costs have to be considered as part of the review of any option, these costs should not be seen as the overriding factor in any situation, but more emphasis should be placed on the risk to public health and/or the environment.
- There should be more scope to widen the breadth of organisations, including local authorities, to be included in the 'responsibility' column, particularly given the sentiments of the 'Protection through Partnership' approach.

Section (Page) Raised by	Feedback	Response
Vision Cambridge Preservation Society.	The Consultation Report is descriptive and analytical, but not visionary. If the intention is to promote a vision then the vision has to be stated directly.	The Vision statement has been re-written for the Action Plan in a more local context.
Vision South Cambs District Council	The Council would like to see greater Local Government representation on the various Boards of the Agency. This would assist in the partnership issues, and would be in line with the recent statement of the Agency and Local Government Associations highlighting the need for liaison at regional and local levels.	The Agency welcomes Local Government representation for all appropriate Boards, Committees and Groups. The Agency endeavours to maintain a full liaison to Local Government Offices, Strategic and Local Planning Authorities and offers relevant support for associated enquiries in order that responsibilities may properly be taken up. This approach supports recent statements made in these respects.
Foreword CPRE	Although mentioned in the third paragraph of the Foreword the report does not address the problem posed by efforts likely to be made by the LPAs to meet the perceived need to provide for the massive growth in households.	This issue is being addressed by Cambridge County Council through their capacity study for the county. The Agency is actively pursuing its interests within this study and the capacity study will be mentioned in the Action Plan.

Section (Page) Raised by	Feedback	Response
Foreword Ciba Specialty Chemicals	Ciba are pleased to note in the foreword that the Agency believes it is important to strike a practical balance between the diverse issues that impact on the water resources and to acknowledge that not all changes will have the negative effect that come with some expansions and new developments. For instance when considering BPEO for a process, in some cases cleaner technologies and processes may lead to changes in the pattern of industrial practices which do not necessarily use less water but will have an overall beneficial impact on the environment.	Noted.
Executive summary Ciba Specialty Chemicals	Ciba Whittlesford should read Novartis Crop Protection.	Noted.
Section One: Introduction		
(1) Ciba Specialty Chemicals	Support the Agency's approach of working towards sustainable development through objectives set by ministers, which include delivery of environmental goals without imposing excessive costs on industry or society as a whole.	Noted.
RSPB	Agency's nature conservation obligations should be set out in this section.	Noted.
CPRE	Despite the fact that the principal aim of the Agency is 'to protect or enhance the environment, taken as a whole', the draft seems to approach its tasks piecemeal, dictated by various statutes especially those under which it has specific duties and responsibilities. There is emphasis on the protection of SSSIs, the rivers and wetlands and little reference to the need to protect the Cam catchment as a whole.	The Agency can only carry out 'tasks' for which it has specific duties and responsibilities. We can however strive to influence others where we do not have any statutory powers.
Section Two: The Cam Area		
2.0 (5) CPRE	The application to develop Chesterton Sidings has now been withdrawn.	Noted.
2.1 (6) CPRE	Arable rather than cereal farming has now replaced the traditional practice of sheep farming.	Noted.

Section (Page) Raised by	Feedback	Response
2.1 (6) English Nature	Welcomes reference to natural areas - please note that a section of Devil's Dyke has been put forward as cSAC.	Noted.
2.1 (7) CPRE	Map 2. Hildersham Wood is shown in the wrong place.	Two sites were labelled up as Hildersham Wood - one of which is in the correct place. See comment below.
2.1 (7) Ciba Specialty Chemicals PLC	Map 2 Confusion over two 'green 15' entries on map	The 'green 15' by the 'black 9' is part of the Whittlesford -Thriplow Hummocky Fields Wetland Associated SSSI and is therefore incorrectly labelled.
2.1 (7) Wildlife Trust	Map 2 Under this heading it is important to mention the importance of non-statutory sites such as County Wildlife Sites, even though these are too numerous to be shown on the map. The Wildlife Trust in partnership with all the Cambridgeshire Local Authorities and various other bodies will finish a project to identify County Wildlife Sites for all districts by the end of 1998.	Noted.
Section Three: Issues and Options		
General Herts County Council	Would it be appropriate to include an issue on general air quality, even though the Agency might not take the lead role?	In many cases the LEAP could well be used as the vehicle for taking forward this topic as an issue. However referring to the full letter from Herts County council it can be seen that their two major actions under this heading i) identify potential AQMa's in the LEAP area and ii) clarify the role of the Agency, local authorities, etc. In respect of the Cam LEAP the two principal District Councils, ie Cambridge City and South Cambridgeshire, were jointly one of the authorities selected by the DOE to pilot the initial staged of the National Air Strategy. It is felt that the issue has been addressed in the LEAP area and future action will be taken forward by means of the Partnership approach.
3.1 (16) AgrEvo UK Ltd	Issue location 18 should be deleted	Noted.

Section (Page) Raised by	Feedback	Response
3.4 (27) CRC	Paragraph 3 to be replaced by 'The Conservators of the River Cam, who are the navigation authority in this area, have addressed the issue with interested groups, particularly Cambridge City Council' Paragraph 4, final sentence to be replaced by 'Initiated by the Conservators of the River Cam, work is in hand by Cambridge City Council to provide a pumpout facility at Jesus Green which the Agency will help fund'. In the box, Cam Conservators should be removed from the Responsibility column.	Noted. Please note that the document was not a draft, but a consultation document that cannot be altered.
3.7 (32) Ciba Specialty Chemicals PLC	Option 2, Advantages - the word 'not' to be deleted.	Noted. Please note that the document was not a draft, but a Consultation Document that cannot be altered.
Section Four: Protection Through Partnership		
General Cambridge Preservation Society	Tendency to seek cosmetic solutions when discussing the practicality of partnerships. Should not distract from the central issue which is to reduce/manage/eliminate pollution. Local action has to be in the context of the global issue.	Noted.
General English Nature	Suggest including Wet Fens for the Future in this section as the Agency is a partner in this initiative.	Noted and brought forward into the Action Plan.
General South Cambs District Council	The Council would seek to support partnerships. Once actions have been agreed following consideration of the report, it is important to give a timetable wherever possible, as to when the indicated environmental improvements may be expected to be realised by. For partnerships to thrive, information has to be freely exchanged. This interchange and liaison would be very much in line with the suggested guiding principles as recently agreed by the Agency and Local Government Associations.	Noted.
Cambs County Council	The commitment to partnership working in order to achieve integrated environmental management is welcomed.	Noted.

Section (Page) Raised by	Feedback	Response
4.1 Aim 1 (39) Cambs County Council	Partnership approaches need to be developed in order to help address the consequences of climate change. It is suggested that the LEAP could report on progress towards reducing CO ₂ emissions and energy saving schemes.	<p>Several responses commented that more emphasis should given to air quality. The Agency has concentrated on activities for which it has direct responsibility.</p> <p>In respect of the air the majority of regulatory responsibility lies with the local authorities. The Agency has concentrated on its role as a partner to the local authorities, etc, such that we assist them in achieving their environmental objectives. Air quality issues are often national issues, with local relevance which the Agency will address nationally. The Agency at a LEAP level will continue to develop partnerships: In the Cambridge area an input has already been made into the County Council's 'State of the Environment' report and inputs such as this will continue. Specific suggestions such as data on CO₂ emissions, etc, are already being addressed by the national 'Chemical Release Inventory' reporting scheme and data from this can be used for LEAP purposes.</p>
4.1 Aim 2 (40) Utlesford District Council	The Council are concerned about improving air quality and have data available for their area. Air Quality should be given a higher profile.	
4.1 Aim 2 (40) Cambs County Council	The Council's Environment and Transport Committee agreed that the best way forward for development of local air quality strategies was through a partnership approach to be developed in conjunction with district councils, health authorities and the Agency. This will enable not only a sharing of expertise and knowledge, but will also ensure that all aspects of air quality are covered.	
4.1 Aim 2 (40) South Cambridgeshire District Council	The Council considers that air quality issues have been downgraded in comparison with water issues. South Cambs District Council and Cambs County Council have worked in partnership with Cambridge City in the pilot study for Air Quality Review. In order to establish its own Air Quality Review, as required by the Environmental Protection Act, the Council sees this as an area where increased partnership can take place.	
4.1 Aim 3 (40) Suffolk County Council	Concerned that the LEAPs process fails to address the problems associated with larger developments such as increased housing demand and the use of scarce water resources. It is recommended that further discussions be held between officers of the council and the Agency.	<p>It is not appropriate for LEAPs to address specific development locations. The timing of any LEAP is not in concert with Strategic Planning processes and therefore cannot be relied upon to address problems associated with new or varied allocations.</p> <p>It is accepted that generic descriptions or statements need, to some extent, expert interpretation. To help address this the Agency liaises directly with County Councils in respect of all relevant development issues and will be pleased to continue liaising as required.</p>
4.1 Aim 3 (40) Cambs County Council	The commitment to review water resources strategy is fully supported. Awareness should be raised, and public should become involved in determining priorities for action. (Citizens jury or visioning?)	Agree that public awareness is important. The water resources strategy (due 1999/2000) will be circulated to as many people/organisations as necessary.

Section (Page) Raised by	Feedback	Response
4.1 Aim 3 (40) Herts County Council	This should make reference to the importance of the much closer integration of development planning through the 'Development Plan' process and water resources issues.	Noted.
4.1 Aim 4 (40) English Nature	Important for the LEAP to consider how the implications of the Habitats Regulations will affect the various functions of the Agency. The plan area contains Wicken Fen and Devil's Dyke cSAC and any plan/project will have to consider the impact on them. The Agency has a duty to review consents issued in the exercising of its powers, in light of conservation objectives for the sites of European importance.	Noted.
4.1 Aim 4 (40) English Nature	Key issue should read 'need to ensure that the targets agreed in LEAPs become incorporated into the routine work of the Agency and partner organisations so that real environmental benefits can be demonstrated'. Once LBAPs are available we suggest LEAPs provide the vehicle for incorporation of actions into Agency's work.	Noted and taken forwarded into the Action Plan.
4.1 Aim 4 (40) Cambs County Council	It is pleasing to see the Agency's commitment will extend beyond playing their part in devising Local Biodiversity Action Plans and their recognition that in order to be successful, Biodiversity Plans will require implementation.	Noted.
4.1 Aim 6 (41) IWA (Head Office)	IWA welcomes the Agency's commitment to their lead role in Integrated River Basin Management.	Noted.
4.1 Aim 6 Cambridge Preservation Society	Recreation use of the river poses the problem that whilst it is desirable to have widespread public use, the river has a limited capacity. In places within Cambridge river settlements are emerging and appear to be beyond control. The result is that river banks are obstructed and there is a danger of raw effluent discharge. Recent consultations with The Conservators of the River Cam were constrained as they will only address issues from a navigation point of view. The Society looks to the Agency to take the lead and find a balance.	The Agency has a duty to promote use of inland and coastal waters for recreation and make best recreational use of land or water in our control. We would liaise with interested parties before undertaking projects and follow the recommendations of 'Sport in the East: Water Recreation Strategy' produced by Eastern Council for Sport and Recreation.

Section (Page) Raised by	Feedback	Response
4.1 Aim 7 (41) Cambs County Council	<p>The intention to update the NRA document 'Guidance notes for Local Planning Authorities on the Methods of Protecting the Water Environment through Development Plans' is welcomed as this has proved useful in the past.</p> <p>It is suggested that future LEAPs could set out specific requirements for drainage or water supply for those areas identified for major development.</p> <p>The need for a wide level of consultation, beyond the confines of a LEAP, is stressed. This type of liaison is vital for development plans to be made on a realistic basis as regards issues within the remit of the Agency. The whole question of water supply and the effects of abstraction on the environment has emerged as one of the key issues in the public consultation on the capacity study. More detailed discussions with the Agency are required to clarify the implication of the matters they have identified for future development.</p>	<p>We welcome the support of our various guidance notes to Councils. It is not appropriate for LEAPs to address specific development locations. The timing of any LEAP is not in concert with Strategic Planning processes and therefore cannot be relied upon to address problems associated with new or varied allocations.</p> <p>It is accepted that generic descriptions or statements need, to some extent, expert interpretation. To help address this the Agency liaises directly with County Councils in respect of all relevant development issues and will be pleased to continue liaising as may be required. Attention is drawn to page 44 referring to a separate document which gives, on a parish by parish basis, preliminary information of constraints.</p>
4.1 Aim 7 (41) Herts County Council	Reference should be made in this section to the regional planning framework and perhaps even the Government's recent proposals for Regional Development Agencies and Regional Chambers, along with the importance of the role of the Agency in these fora.	Noted. We look forward to being further included within the strategic planning processes.
4.1 Figure 5 (42) Herts County Council	The South East Regional Planning Conference is not shown on the diagram, nor the Secretary of State's Regional Planning Guidance which is, in fact, the prime regional influence on land use planning.	Noted and brought forward into the Action Plan.
4.1 Table 3 (43) Cambs County Council	<p>Cambs Aggregates Local Plan may be considered following the results of the National Aggregates Monitoring Survey. There is no undertaking to actually carry out a review at this stage.</p> <p>The Waste Local Plan is now a joint plan being prepared by Cambs County Council and Peterborough City Council. Anticipated that a consultation draft Local Plan will be published late summer 98.</p>	Noted.

Section (Page) Raised by	Feedback	Response
4.1 Table 3 (43) Herts County Council	Hertfordshire's entries should read as follows: Structure Plan - Hertfordshire Structure Plan Review (1991 - 2011) adopted 30 April 1998. Minerals Local Plan - proposed further modification on deposit winter 1998 following public Inquiry and Inspectors Report. Adoption anticipated summer 1998. Waste Local Plan - proposed modification on deposit spring 1998 following Public Inquiry and Inspectors Report. Adoption anticipated late 1998.	Noted and brought forward into the Action Plan
4.1 Aim 7 (44) Herts County Council	LEAPs should form an important and integral element of the wider liaison between local authorities and the Agency in the preparation of the 'Development Plan'. This section quite rightly stresses how important this liaison is, for example, in the integration of water resource and management issues in the decision-making process of determining where development should be directed and whether there are areas where development should be contained. Equally, larger groups of LEAPs presumably come together to form part of the Agency's input into the work of the regional strategies prepared by the planning conferences and into the preparation of regional planning guidance by the Secretary of State.	Noted. We look forward to being further included within strategic planning processes.
4.1 Aim 7 (44) CPRE	Welcome issue on source control. Implications for all development which act as water catchments and may cause flooding and loss of water to the natural environment. Pity the Agency does not have the power to insist on developers incorporating features of source control. Agency does not seem to have any power to veto any plan to develop land which in its view would cause irretrievable damage to the environment except through the Flood Defence Byelaws.	Noted. We encourage developers to use the appropriate surface and foul water management systems via the planning process.
4.1 Aim 7 (44) English Nature	Endorse key issue 'Conserving the land and managing our water resources'. In terms of managing run-off would like to see systems encouraged which bring with them wildlife benefits.	Noted.

Section (Page) Raised by	Feedback	Response
4.1 Aim 8 (45) Uttlesford District Council	Together with Uttlesford LA21 Group UDC have an ongoing commitment to promoting waste minimisation. UDC would welcome the Agency's active participation in their LA 21 forum.	Noted.
4.1 Aim 8 (45) Tidy Britain Group	Partnerships with many organisations are emphasised in this topic and it is important that the organisations are co-ordinated so that the public are made aware of potential problems they may be causing, impacts are assessed, and action is taken against persons who blatantly pollute the environment. In many instances local authorities may be able to assist in appropriate action against the regular, small scale fly-tippers.	Noted.
4.1 Aim 8(45) Ciba Specialty Chemicals	Note that during the exceptional rainfall and high river flows in April 98 the weir installed by the Agency in partnership with Ciba Specialty Chemicals came into action, flooding the company's fields and thereby protecting Duxford village.	Noted.
4.2(45) Herts County Council	It may be appropriate to refer to the document 'Sustainable Local Communities for the 21st Century - Why and How to Prepare an Effective Local Agenda 21 Strategy', produced by the new government with the Local Government Association and Local Government Management Board. Also the government document 'Sustainable Development: Opportunities for Change'. Herts County Council's approach to Agenda 21 is contained in its document 'Green County, Hertfordshire - Hertfordshire's Framework for Agenda 21'. Herts has piloted town level Local Agenda 21 schemes, known as Whole Settlement Strategies', and also has a countywide Environmental Forum, which produces the County's State for the Environment Report.	Noted and brought forward into the Action Plan.

Section (Page) Raised by	Feedback	Response
4.2 (46) Herts County Council	The Council sees the Agency's input as a crucial element of its own Agenda 21 and Local Agenda 21 process, and would hope to make a full contribution to the Agency's own Agenda 21 initiatives and the LEAP process. Effective and enhanced general communication between the Agency and local authorities is the key to ensuring the right links are made between respective Agenda 21 initiatives.	Noted. The Agency agree with this statement and is keen to develop its relationship with local and county authorities generally. This is being achieved through various routes, but especially through planning liaison and LEAPs. The Agency is also endeavouring to develop this relationship through involvement in LA21 initiatives.
4.2 (46) FRCA	Agriculture has an important role to play in enhancing biodiversity through the use of sustainable farming techniques such as integrated crop management.	Noted.
4.2 (47) Cambs County Council	Local Agenda 21 is a two-way process aimed at balancing social, economic and environmental needs. The key issues should not just concern how the Agency can help the LA21 process, it should also be about how the LA21 process can help the Agency.	Noted.
4.2 (47) Cambs County Council	Themes for consideration in Cambs are: rivers and wetlands; urban; woodland; dry grassland; arable farmland.	Noted and brought forward into the Action Plan.
4.2 (47) English Nature	Table 4: Cambridgeshire's 'Framework for Action' Published Dec 1997. The Bedfordshire document is also published. 'A 50 year Vision for the Wildlife and Natural Habitats of Hertfordshire' is out for consultation on final draft.	Noted and brought forward into the Action Plan.
4.2 (47) RSPB	Table 4: Omission of the RSPB from the list of Partners involved in Biodiversity Action Planning. (Apologies from the Agency for this oversight.)	Noted and brought forward into the Action Plan.
4.2 (47) FRCA	Table 4: FRCA provides general advice and information on the contribution that MAFF schemes can make to the preparation of Local BAPs. However, they are not partner organisations, and therefore FRCA should be deleted as one of the partner organisation within Suffolk BAP.	Noted and brought forward into the Action Plan.
4.2 (47) South Cambs District Council	The Council places great value on biodiversity initiatives and is likely to join the Agency in supporting the emerging BAP.	Noted.

Section (Page) Raised by	Feedback	Response
4.3 (47) Cambs County Council	Education and awareness raising also helps people make the right decisions about protecting and improving the environment. The Cambs LA21 Round Table provides an ideal forum for raising such issues and developing campaigns to promote awareness.	Noted.
4.3 (48) RSPB	RSPB would like it to be known that there may be opportunities for the Agency to become involved at their reserve at Fowlmere, where it has an active educational programme.	Noted.
4.3 (48) Tidy Britain Group	Education is an extremely important tool and should assist in mitigating future environmental problems. The Group promote the Eco-Schools programme which is a European wide, environmental initiative. It promotes good environmental management practices through practical and desk-top studies.	Noted.
Section Five: Uses, Activities and Pressures		
5.1.1 (49) CPRE	Need to highlight the reduction of groundwater replenishment.	Noted.
5.1.2 (50) Cambs County Council	Reference should be made to the Cambridgeshire Landscape Guidelines in this section. This manual for management and change in the rural landscape has been adopted as supplementary planning guidance.	Noted and brought forward into the Action Plan.
5.1.2 (51) Andrew Lansley MP House of Commons	Impact of the new settlement on the A428, Bourn Brook and its floodplain gives concern in Bourne. Welcome an examination of this forming part of the Action Plan to ensure the balancing lakes are adequate for all purposes.	The Agency have fully supported the local authority in the respect of ensuring prudent flood defence measures regarding the impact of the new settlement on the A428 (Cambourne). This matter could not have been addressed through the LEAP process. Our work in assisting the LPA predates the LEAP. Work will continue throughout the development process in monitoring surface water flows, flow controls and associated balancing lakes. It is intended that South Cambs will adopt, in perpetuity, the flood defence capacities of the balancing lakes whilst AWSL will adopt the foul and surface water sewerage including the flow control and relief sewers.

Section (Page) Raised by	Feedback	Response
5.1.2 (51) Herts County Council	The 'Report of Panel' produced following the Examination in Public into Hertfordshire's Structure Plan did not allocate 300 dwellings at Royston. Rather it recommended that an extra 300 dwellings be included in the district allocation for North Hertfordshire.	Noted. Please note that the document was not a draft, but a consultation document that cannot be altered.
5.1.2 (52) Ciba Specialty Chemicals	Map 6 In 'Biodiversity' box - 'Specialty' spelt incorrectly.	Noted.
5.2 (53) IWA (Head Office)	Surprised at the absence of any mention of transport by boat either for freight or public transport. Urges the Agency to consider this option.	Noted.
5.2.1 (53) Cambs County Council	Reference could be made to the government's Integrated Transport Strategy.	Noted and brought forward into the Action Plan.
5.3.2 (54) AgrEvo UK Ltd	Wording about AgrEvo formulation/packaging plant is misleading, as the wording may be taken to mean that the plant is operating in an unauthorised manner.	The Agency notes the comment and confirms that the formulation/packaging plant at AgrEvo is <u>not</u> operating in an unauthorised manner.
5.3.2 (54) Andrew Lansley MP House of Commons	Surprised that the question of historical and current emissions from AgrEvo, Hauxton was not highlighted as an issue.	Noted, but see Aims 7 and 9, which cover this point in a more generic manner.
5.3.2 (55) Ciba Specialty Chemicals PLC	Map 7 '3 Ciba Polymers' should read '3 Ciba Specialty Chemicals'	Noted.
5.3.2 (56) Ciba Specialty Chemicals PLC	Table 5 In the Ciba Specialty Chemicals Duxford line in the Part B process column is listed Hexcel. This wrongly links two separate companies. It should either be deleted or entered on a separate line. Also Where does note 2 refer to?	Noted. Please note that the document was not a draft, but a Consultation Document that cannot be altered. It refers to the Emissions title in the table.

Section (Page) Raised by	Feedback	Response
5.3.2 (57) Ciba Specialty Chemicals PLC	<p>Clarification regarding Ciba Specialty Chemicals:</p> <p>Prior to 1996 the Duxford site was home to 2 divisions of Ciba Geigy plc; namely, Ciba Polymers and Ciba Composites. Recently the Composites division was sold to Hexcel Corporation and now exists as a separate independent company called Hexcel Composites. Then Ciba Geigy and Sandoz merged and formed a new company Novartis. However the industrial divisions of Novartis were then split off to form a new company Ciba Specialty Chemicals. At that time Ciba Agriculture at Whittlesford became Novartis Crop Protection.</p>	Noted.
5.5 (61) RSPB	<p>The statement could be strengthened by referring to the creation of key habitats, such as reedbed, as identified in the UK Biodiversity Plan. The creation of such habitats would contribute to achieving national and local biodiversity targets.</p>	Noted.
5.5.2 (62) Greenham Construction Materials Ltd	<p>Suggest that Section 5.5.2 should read: '... and sand/gravel quarries. Historically non-inert landfilling was carried out on an uncontained basis in often unsuitable geological strata with consequent risks to water resources from the uncontrolled release of leachate and to development and vegetation from the migration of landfill gas. Today the landfilling of potentially polluting waste should normally be on a containment basis, thus considerably reducing'</p>	Noted. Please note that the document was not a draft, but a Consultation Document that cannot be altered.
5.6 (62) RSPB	<p>Omission of reference to the pilot Arable Stewardship Scheme (ASS) as being relevant to the LEAP area. The ASS is relevant to the Cam LEAP as the scheme could potentially significantly reduce diffuse agricultural run-off into water courses.</p>	Noted. Please note that the document was not a draft, but a Consultation Document that cannot be altered.

Section (Page) Raised by	Feedback	Response
5.6.1 (62) FRCA	<p>Suggest a paragraph should be included on diversification, after the first para of this section:</p> <p>'If it is to meet these challenges the industry must continue to look beyond traditional agriculture, growing crops and rearing livestock, to meet the needs of the market place and identify new opportunities to maintain incomes and employment. This has already led to a more diverse range of activities carried out both on and off the farm, employing assets that had previously not been fully utilised. In addition, agriculture must continue to develop sustainable farming methods and quality assurance to meet the needs of the environment, the market place and legislation.'</p>	<p>Noted. Please note that the document was not a draft, but a Consultation Document that cannot be altered.</p>
5.6.1 (63) MAFF	<p>Penultimate para, line 2: Before 'Catchment areas' insert 'As required by the EC Nitrate Directive'</p> <p>Penultimate para, line 5: Delete from 'The designation of NVZ boundaries... ' to the end of the last bullet point and replace with 'The initial designation of NVZs was made in March 1996. As required by the Directive, NVZs are reviewed every four years and the first review is currently underway. In existing NVZs an action programme of compulsory measures will come into force on 19 December 1998 to reduce existing nitrate pollution and prevent further pollution. The measures include a requirement for farmers to limit applications of fertilisers and livestock manures and to observe a closed period for some applications of organic manures.'</p>	<p>Noted. Please note that the document was not a draft, but a Consultation Document that cannot be altered.</p>

Section (Page) Raised by	Feedback	Response
5.6.2 (64) FRCA	<p>It is not clear why a link is made between set-aside and land quality. The sources of the agricultural tables, the Agricultural Census and Agricultural Land Classification (ALC) Map, which is based on the MAFF Provisional ALC maps should be acknowledged in the document.</p> <p>Concern also expressed that the colours used for grade 1 land and land predominantly in urban use are too similar and can lead to misinterpretation. Grade 1 land is shown on the published maps as dark blue.</p> <p>Care must be used in interpreting these maps, which were published for strategic purposes, as there are limitations imposed by the level of detail available. For example, grade 3 is not sub-divided nor are areas of less than 80 hectares identified separately, which makes it necessary to exercise caution if attempts are made to identify land quality of smaller sites.</p> <p>Table 6 Farm diversification is not a scheme.</p> <p>Table 7 It should be born in mind that increases in cattle and sheep farms are before the changes that occurred in 1996 as a result of BSE and may not reflect the current situation.</p>	<p>This comment came from the 'Agricultural Issues within the Cam River Catchment' supplied by FRCA (page 5 paragraph 2.2.2). The beginning of 5.6.1 states 'this section has been compiled with the assistance of MAFF/FRCA'.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
5.8 (68) RSPB	LEAPs should take into account the potential threat caused by the escape of farmed fish, such as rainbow trout and introduced crayfish, upon populations of native brown trout and the globally threatened white-clawed crayfish.	Whilst there are no fish farms in this area it is the statutory duty of the Agency to reduce the risk of escape.
5.9.1 (69) South Cambs District Council	The Council would wish to see the Agency place greater emphasis on waste minimisation, especially commercial/ industrial waste.	Noted and brought forward in Action Plan in the section 'A Better Environment Through Partnership'.
5.9.1 (69) Greenham Construction Materials Ltd	Refers to the diversion of wastes to legal, non-licensable activities. Such activities have tended to involve the use of inert, construction and demolition waste. The increased use of such waste has led to a shortage of inert materials for landfill engineering works and for the reinstatement of inert-only landfill sites. Given the scale and nature of some of these licence exempt disposal activities it is important that the Agency employ sufficient resources to provide adequate monitoring of those activities in line with Objective 1, Section 6.4.1, page 104.	<p>Noted.</p> <p>Monitoring of exempt waste to land activities need to be effectively monitored to ensure compliance with the terms of the exemption.</p>

Section (Page) Raised by	Feedback	Response
5.9.2 (73) South Cambs District Council	The Council is disappointed that the role of Local Government is not acknowledged in resolving and clearing up fly-tipping.	Noted and brought forward in Action Plan.
5.9.4 (75) Waterbeach Angling Club	<p>From observation it is clear that the major flows running through the river at Bottisham Locks, Waterbeach, which is the Club's premier interest fishery, seems to be emanating from the outfall from the Cambridge Sewage Works. We would like to have the information which indicated the dilution of the sewage.</p> <p>Members believe this year the situation was so critical that we only just averted a major pollution disaster. It is obvious that your authority are aware of the problem because of the installation of aeration units above Bottisham Locks and below Clayhithe Bridge.</p>	<p>Under average flow conditions Cambridge STW makes up approximately 15% of the river flow, this can rise to 45% during summer low flow conditions.</p> <p>To date, there has not been a critical situation for this year. There have been historical problems with low dissolved oxygen in the Cam although these problems have reduced recently. There has been aeration equipment, either mobile or fixed, at Clayhithe for at least 25 years and this has not been required for pollution reasons this year.</p>
5.9.4 (76) Ciba Specialty Chemicals PLC	Map 10 '11 Ciba Geigy' should read '11 Ciba Specialty Chemicals'	Noted.
5.10 (77) CPRE	No mention of problem of abstractors who have 'Licences of Right'. Perhaps the operation of those licences is not significant in the overall water supply.	Licences of Right describe abstractions which were in existence prior to the 1963 Water Resources Act. The licences were granted 'until revoked'. There are no particular outstanding issues about such licences in the LEAP area.
5.10.2 (79) CPRE	Concerned that licences to abstract groundwater may be used for purposes for which they were not intended, eg, an agricultural licence being used for watering a golf course.	This would be in breach of licence conditions and liable to prosecution.
5.10.2 (79) AWSL	AWSL have three boreholes not four; Westoe Farm, Swaffham Prior (both out of use) and Southfields.	We have included the Greensand borehole at Dunton.
5.10.2 (79) Uttlesford District Council	The Council are aware of a number of private water supplies within the LEAP and most are experiencing severe problems with falling groundwater levels. These householders do not have the resources of the water companies to develop alternative sources of supply, and need consideration.	We can offer advice in these circumstances. These abstractions are 'protected rights' and are protected when we consider new applications for water abstraction.
5.11.2 (85) CPRE	When will the Agency become the enforcement authority for reservoirs holding > 25,000 m ³ ?	The exact date has not been decided. County Councils will continue to organise the requirements of the Reservoirs Act.

Section (Page) Raised by	Feedback	Response
5.12 (87) English Sports Council	The Sports Council (and now the English Sports Council) are not the successors to the Eastern Council for Sport and Recreation.	Noted.
5.12 (87) IWA(Cambs) and CMBC	Although mention is made of the Sports Council Zone 1 report being fully endorsed, there are some aspects which IWA and the CMBC do not fully support, in particular the rather divisive paragraph referring to rowing interests being safeguarded; it is much better to be flexible and to have continuous discussions between groups. What happens in Cambridge can affect the use of the river lower down.	Noted.
5.12 (87) RSPB (1/5/98)	The RSPB's reserve at Fowlmere is an important facility for recreation and attracts around 20,000 visitors annually.	Noted.
5.12.4 (89) USSC Angling Club	Concern expressed over lack of fish in certain areas of the river. Currently under investigation by the Agency.	Noted.
5.12 (90) IWA (Head Office)	Agency should spell out which of the Sports Council Zone 1 recommendations they 'fully endorse'. Would like a more detailed statement regarding the Agency's position on this. IWA do not fully support all the recommendations.	The Agency supports all Zone 1 recommendations.
	The principal concern centres around para 1.67 in the report which states that the 'lower river' through Cambridge 'should continue to have priority use by rowing boats'. Powered craft have as strong a legal right of navigation on the river as rowers. IWA feels that the Sports Council unfairly favours the interests of rowers and punters above other people using the river. Also concerned by proposals by Cam Conservators which will potentially prohibit mooring along large stretches of the river through Cambridge because this is deemed to be an obstruction to rowers. IWA feel that this is a one-sided approach, and that there should be give and take by all users.	The Agency is not the Navigation Authority for this stretch of river.
	Pleased to see the recent improvements to facilities at Upware and Burwell and hope that Agency will undertake such improvements on the Swaffham Bulbeck and Bottisham Lodes.	Noted.

Section (Page) Raised by	Feedback	Response
5.12.4 (91) T Legge	<p>Map 14 Should show free fishing at Newnham, Grantchester Meadows and Byron's Pool.</p> <p>What other stretches of free fishing are there?</p> <p>Do Spicer's Angling actually control the stretch upstream of their fenced boundary alongside which a public footpath runs?</p> <p>Are the recreation grounds at Great and Little Shelford Free Fishing?</p> <p>Are Caxton Park Lakes still open to day ticket anglers?</p> <p>The Landbeach Marina site has not been mentioned. What is the current status of fish stocks there?</p>	<p>The scale of this map is not sufficient to show free fishing sites in detail. It would be more appropriate to list free fishing in Anglian Region's Angling Guide.</p> <p>Not known - we do not hold this information. Suggest contacting tackle shops.</p> <p>This is not an Agency issue. Need to contact the Angling club direct (01223 834555)</p> <p>Yes.</p> <p>No longer a day ticket listing.</p> <p>Landbeach Marina is currently being filled in to make way for industrial estate. Fish being relocated by fisheries consultant.</p>
5.12.6 (90) IWA(Cambs) and CMBC	Use of the Lodes tends to be restricted to early season before weed growth becomes excessive and causes problems for some boats (using raw water cooling), but this does vary from one season to the next.	Noted.
5.12.6 (90) Cambridge Canoeing Association	The river between Byron's pool and Baitsbite Lock is grossly overcrowded with a variety of boats at peak times. Canoeists find themselves in conflict with rowers, motorboats and punts. Improved access for canoeists is needed.	Noted. The Agency is not the Navigation Authority for this stretch of river.
5.12.8 (92) CMBC	The statement that the downstream end of the River Cam 'is heavily used by motorised cruisers' is overstating the position.	Noted. Please note the document was not a draft, but a consultation document that cannot be altered.
5.12.7 (92) Cambridge Canoeing Association	As of December 1996 the Sports Council no longer has a remit for water, recreation and amenity, and regrettably this role has not been filled by another organisation.	Noted.
5.13.1 (93) English Nature	Agency has obligations under The Conservation (Natural Habitats, & C) Regulations 1994 with respect to site of European importance, ie, Wicken Fen cSAC and Devil Dyke cSAC.	Noted.
5.13.1 (93) CPRE	Concerned that the Agency's remit 'may in the future extend beyond rivers and wetlands to include terrestrial habitats'.	The Agency has no proactive powers in this area and may only be involved by kind invitation from other agencies.

Section (Page) Raised by	Feedback	Response
5.13.2 (94) RSPB	Mention should be made to the threats caused to native wildlife by exotic animals such as the signal crayfish and mink.	Noted. Refer to issue 8.
5.14 (95) IWA (Head Office)	Suggest that mention might also be made of the need to care for navigation and flood control works in the Agency's care and the historic perspectives of the River Cam and the Lodes for the carriage of freight. Agency has an education role in these respects.	Noted.
5.14.1 (95) MAFF	Suggests that paragraph three is not relevant in this statement, as there are no ESAs in the area covered by this plan.	Noted.
5.14.1 (95) South Cambs District Council	It is noted that the buildings and archaeology which form part of the heritage are not considered beyond a passing reference. It might be possible to develop this important area in conjunction with the local authorities with the aim of, at least, preserving important sites of industrial archaeology interest.	Noted.
5.14.1 (95) Cambs County Council	<p>The area covered by the plan includes much of archaeological interest. Present government guidance and national policy identifies the importance of conservation of the historic environment. Where at all possible the Cambridgeshire Archaeology Office aims to preserve important archaeological remains in situ.</p> <p>It is important that the Agency assess, and where appropriate, protect and conserve important archaeological and landscape features directly associated with waterways.</p> <p>It is suggested that the Agency makes a commitment to the enhancement of the historic environment. An objective to protect and conserve archaeological sites and landscapes directly associated with inland and coastal waters could be considered. Through this archaeological sites which should benefit from improved management could be identified and water management options could aim to contribute to the best management of areas of archaeological remains.</p> <p>Enhancement of the settings of sites and monuments through the presentation and interpretation of heritage sites and features could also be included. This can greatly add to the enjoyment of waterways by the public.</p>	<p>Whilst the Environment Act 1995 Section 7 paragraph (c) states:</p> <p>'any proposal relating to any functions of the Agency:</p> <p>(i) to have regard to the desirability of protecting and conserving buildings, sites and objects of archaeological, architectural, engineering or historic interests;</p> <p>(ii) to take into account any effect which the proposals would have on the beauty or amenity of any rural or urban area or on any such flora, fauna, features, building, sites or objects; and,</p> <p>(iii) to have regard to any effect which the proposals would have on the economy and social well-being of local communities in rural areas,'</p> <p>direct involvement is not within our given remit or funding.</p>

Section (Page) Raised by	Feedback	Response
Section Six: State of the Local Environment		
6.6.1 (110) Andrew Lansley MP House of Commons	Recent floods have highlighted areas of risk and need for action. I'm sure you have this in hand.	Noted.
6.7.2 (117) CPRE	Concerned that the licensing horizon is the year 2011. Local planning authorities consider development to the year 2016 - Agency should push their horizon to at least that year.	Noted. The 'licensing horizon' is due to change in the near future. Water Resources planning is, however, carried out beyond 2011 to enable plans to be made in advance of demand.
6.5 (109) FRCA	Although organic matter wastage occurs on peat soils under arable cultivation, rates of organic matter wastage cannot be accurately predicted, because they are dependant on a range of factors connected with soil characteristics, cultivation techniques, crop/soil husbandry and water management regimes. As organic matter wastage occurs more stable organic soils develop which are still eligible for grade 1. Little or no documented evidence exists to indicate the likely rate of organic wastage in these soils, other than in peaty soils. Consequently it is likely that such organic mineral soils and their capabilities will continue to exist for the foreseeable future. The cropping undertaken will reflect the limitations of the soils and the specific management requirements. In order to maintain the peat depth, it is advised that under agricultural cropping the water regime should be managed by keeping the water table as close to the surface as possible, consistent with the need to manage the land for food production.	Noted.
6.7.3 (118) CPRE	Regional water resources strategy to be rewritten in 1999 - should be brought forward. Reconsider the statement 'PWS and industrial demands are currently met and not forecast to rise significantly'.	The water resources strategy will be written following the AMP3 programme set by OFWAT. It may be that PWS demands do not rise significantly if aspects such as leakage reduction and other efficiencies are effective.
6.8.2 (125) Cambridge Canoeing Association	An explanation of the term 'benthic biomass' would be greatly appreciated.	Noted. Benthic biomass refers to all living organisms in the bottom of the watercourse. In the right conditions it floats to the surface and can cover large areas of the water's surface.

Section (Page) Raised by	Feedback	Response
6.8.2.(125) Waterbeach Angling Club	The Club are concerned that there have been recent pollutions within the river system emanating from the Cambridge Sewage Works and in years gone by from the river side pumping stations. Both of which have illustrated that the pollution control system currently in operation has a delayed warning system and we would urge the Agency to install a permanent monitoring system on all sewage works, throughout the system, where there is the possibility of contamination of the works by caustic substances.	AWSL have installed monitoring equipment at Cambridge STW for management purposes and use it as an alarm system. Alkaline trade effluent discharges to foul sewer systems would be controlled by a trade effluent consent with the Water Company however, we are unaware of any strongly alkaline trade effluent discharges within the catchment.
6.8.3 (127) Cambridge Canoeing Association	The extensive duckweed growth did in fact affect water quality. The growth was so dense in places that it was very hard to make progress in a canoe, and the smell did not indicate that water quality was good.	In comparison to some duckweed infestations where watercourses have been deoxygenated, fish have died and the Agency has deployed aeration equipment to reduce the septic smell, the River Cam has not been seriously damaged by duckweed. Analysis of routine water samples (Green Dragon footbridge, Bottisham Lock) did not highlight any water quality problems that could be associated with duckweed. There may however be isolated pockets of poor water quality caused by thick layers of vegetation.
6.8.3 (128) Wildlife Trust	Eutrophication and in particular high levels of phosphates in water bodies caused by human activities can be harmful to wildlife. There is evidence that phosphate levels in rivers have been increasing, and it is of concern that phosphates have not been included in the evaluation of water quality. The Trust would like to see investigation and other activities by the Agency to address this problem.	Phosphate monitoring is carried out on the River Cam with the potential to put it forward as a candidate for a Sensitive Area (eutrophic) which will be decided the DETR in 2001.
6.9.2 (130) Ciba Specialty Chemicals PLC	Ciba Polymers' should read 'Ciba Specialty Chemicals' 'Ciba Agriculture' should read 'Novartis Crop Rotation'	Noted.

Section (Page) Raised by	Feedback	Response
6.9.2 (132) English Nature	<p>Map 21</p> <p>Should this also include Slip End Borehole? In terms of groundwater travel times, there is evidence that dyes in Swallow holes shows up in wells nearby within a matter of days. A change in the pumping regimes at Ashwell Springs is apparent in a couple of days suggesting that the site is more vulnerable to pollution than the map suggests. EN would appreciate further clarification.</p>	<p>Perhaps as you say, Map 21 should include Slip End Borehole.</p> <p>The Agency recognises that any method is limited by the sufficiency of the data on the aquifer and its hydraulic characteristics. It is therefore, willing to consider the redefinition of zone boundaries in the light of additional investigations carried out prior to particular developments or land use changes. Source Protection Zones are rarely regarded as definitive and will be subject to regular reappraisal in the light of new knowledge or changed circumstances.</p>
6.9.2 (132) CPRE	<p>Map 21</p> <p>Borehole 22 is incorrectly labelled Duxford or in the wrong place.</p>	<p>There is a source called Duxford at TL4595 4621 which is west of Duxford/M11.</p>
6.10.3 (137) Cambs and Isle of Ely Federation of Anglers	<p>Believe there is a need for a pollution monitoring station at Baitsbite Lock, so that any problem would not have to wait until it is recorded at Bottisham Lock, which could destroy a valuable fishery.</p> <p>Also concerned that river weed problems have been experienced over the last few years, resulting in the fisheries being unable to be used during the summer period. The weed could result in the de-oxygenisation of the river and subsequent danger of pollution.</p> <p>They would like to see a better form of cutting carried out over the next five years. Would like to see a consortium or partnership drawn up with all the recreational and other users for the Lodes system to try and alleviate the decline of their upkeep.</p>	<p>The Agency would like to have more monitoring stations on all river systems, as well as the River Cam. However they are extremely expensive to install and maintain. It is unlikely that the cost of a monitoring station at Baits Bite, so close to the existing station at Bottisham Lock, could be justified.</p> <p>A review of the Agency's weedcutting programme is currently being carried out. Although weed cutting is undertaken by flood defence and navigation, we will consider angling interests where possible through liaison and discussion, (eg. selective weed cutting for Division 2 angling match on Cam and prior to match (albeit cancelled) on Burwell Lode.)</p> <p>The Agency is attending twice yearly Countryside Access Forum meeting to discuss access issues. Issue of management of Reach and Burwell Lode being managed through discussion and liaison between local user groups.</p>
6.11 English Nature	<p>This section could make reference to the county based documents which have been produced since the 1996 'Action for Wildlife' regional guide.</p>	<p>Noted and brought forward into the Action Plan.</p>
6.11 (138) RSPB	<p>Recommend that the Agency's commitment to helping achieve targets to be identified in the developing Cambridgeshire Biodiversity Action Plan to be included as an Objective.</p>	<p>Noted. Please note the document was not a draft, but a consultation document that cannot be altered.</p>

Section (Page) Raised by	Feedback	Response
6.11.2 (139) English Nature	Agency, through its monitoring work, can contribute towards county based Biological Records Centres. Accessible, reliable data is essential if collectively we are to monitor whether we are delivering LBAP targets.	Noted.
6.11.3 (140) RSPB	The last paragraph to be amended to '...should be conserved and where applicable enhanced and created.'	Noted. Please note this document was not a draft, but a consultation document which cannot be altered.
6.11.13 (140) English Nature	Helpful if the list of national BAP species for which the Agency leads on could be annotated to indicate those which occur within or could become re-established in this area. Hertfordshire Phase I survey is now complete and CWS have been selected for North Herts District.	Noted.
Section Seven: Next Steps		
7.0 (143) Ciba Specialty Chemicals PLC	Penultimate paragraph - Action Plan due date should read 'October 1998'.	Noted.
Appendix B		
MAFF	There should be an entry in the Glossary under Arable Stewardship, saying: 'A MAFF pilot scheme which offers payments to arable farmers in parts of East Anglia and the West Midlands to manage their land in ways which encourage wildlife.'	Noted.
(B1) MAFF	Countryside Stewardship Scheme - should say 'Scheme run by MAFF in which	Noted.

6.0 NEXT STEPS

This document has been distributed to all the Consultees who responded and all members of the AEG sub-group who were involved.

The Action Plan is currently being finalised and will be distributed during October 1998. The Action Plan is monitored and reviewed annually and the results published in the Annual Review. The whole process is reviewed after five years.

Thank you for your involvement in this process.

APPENDIX A: ABBREVIATIONS

ADAS	Agricultural Development Advisory Service
AEG	Area Environment Group
ALC	Area Land Classification
AMP2/3	Asset Management Plan 2/3
AQMA	Air Quality Management Area
ASS	Arable Stewardship Scheme
AWSL	Anglian Water Services Limited
BAP	Biodiversity Action Plan
BATNEEC	Best Available Technology Not Entailing Excessive Cost
BPEO	Best Practicable Environmental Option
BSE	Bovine Spongiform Encephalopathy
CLA	Country Landowners Association
CMBC	Cambridge Motor Boat Club
CO₂	Carbon Dioxide
CPRE	Council for the Protection of Rural England
CRC	Conservators of the River Cam
cSAC	Candidate Special Areas of Conservation
CWS	County Wildlife Sites
DoE	Department of the Environment
EN	English Nature
FRCA	Farming and Rural Conservation Agency
GOBA	Great Ouse Boating Association

IPC	Integrated Pollution Control
IWA	Inland Waterways Association
LA21	Local Agenda 21
LEAP	Local Environment Agency Plan
LPA	Local Planning Authority
MAFF	Ministry of Agriculture Fisheries & Food
MPG	Mineral Policy Guidance
NRA	National Rivers Authority
NVZ	Nitrate Vulnerable Zone
OFWAT	Office of Water Services
PWS	Public Water Supply
RSPB	Royal Society for the Protection of Birds
SLF	Secondary Liquid Fuels
SSSI	Site of Special Scientific Interest
USSC	University Sports and Social Club
WLMP	Water Level Management Plan

APPENDIX B: PROJECT TEAM AND AEG SUB-GROUP

Project Team

Paul Waldron:	Environment Planning Manager (Project Leader)
Rona Chellew:	Team Leader - LEAPs (Plan Coordinator)
Alan Rich:	Team Leader - Planning Liaison
Gary Watkins:	Team Leader - Tactical Planning
Pauline Jones:	Tactical Planning Officer
Clive Hughes:	Environmental Protection Officer
Geraldine Daly:	Conservation Officer
Julie Barker:	Water Resources Engineer
Dave Gillett:	Flood Defence Engineer
Martin Leach:	Pollution Inspector

Representatives of the Great Ouse Area Environment Group (AEG)

Barrie Rickards
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