

EA-MIDLANDS LEAPS-BOX 2

**DERBYSHIRE DERWENT**

**LOCAL ENVIRONMENT AGENCY PLAN**

**Statement of Public Consultation**

March 1999



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## Foreword

The Environment Agency is committed to public consultation. Within the Local Environment Agency Plan (LEAP) process, public consultation is an important building block for developing the Agency's own action programme and in building partnerships with external organisations. We undertake an extensive public consultation exercise with local authorities, businesses, environmental pressure groups and amenity societies as well as with the general public. This statement presents the comments that were received.

The LEAP Consultation Report has been produced by the Lower Trent Area of the Environment Agency, one of four areas within the Midlands Region. The Action Plan has also been produced and incorporates the comments made in this statement wherever appropriate.

**Andrew Wood**  
**Area Manager – Lower Trent, Midlands Region**

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## **Introduction**

The Environment Agency is committed to full consultation during all stages of the Local Environment Agency Plan (LEAP) process. During the compilation of the Derbyshire Derwent LEAP, launched in February 1998, we undertook extensive consultation with interested parties and the general public. This document reviews that process and presents the comments from the letters of response and the questionnaire responses. The document is in four parts:

1. *The consultation process*
2. *Summary of responses*
3. *Responses from consultees and action taken*
4. *Further action.*

### **1 The consultation process**

#### **1.1 Informal consultation**

In July 1997 the Agency wrote to a range of organisations and groups, including local authorities and other representative bodies asking for comments on an initial list of issues and problems affecting the environment in the area. In total 55 organisations responded. All comments from this initial informal consultation were considered and where appropriate were incorporated into the consultation report.

In order to support openness, objectivity and accountability, the Agency is required by law to consult committees on all aspects of its work. Membership of the Regional Committees consists of local people drawn from public life including industry, agriculture, local authorities and environment groups.

The Lower Trent Area is served by its own Area Environment Group (AEG). This was established in January 1997. Membership consists of local people who live or work in the area and who represent a wide range of interests. These include local authorities, industry, agriculture, conservation, amenity and recreational interests and riparian owners. The group advises the Agency on LEAPs, the delivery of local services and act as a link between the local community, the Agency and its statutory committees. The AEG has set up sub groups to consider all draft LEAP documents and advise on the LEAP process. The sub group for the Derbyshire Derwent LEAP has been involved in the plan process from the outset of this LEAP. Their advice and comments have been invaluable in enabling the Agency to focus on the real issues in the LEAP area.

#### **1.2 Formal consultation**

The Consultation Report was launched on 2 February 1998 at Pride Park, Derby. We invited over 300 individuals and organisations to the launch. A total of 51 attended the launch, representing a wide range of interests from within the area including local authorities, environmental organisations, industry, recreation, sports groups and angling clubs. All delegates received a copy of the Consultation Report and directly after the launch, a further 300 reports were distributed to a wide range of organisations and individuals on our mailing list and on request.

The launch marked the start of the formal three month consultation period, which ended on 30 April 1998. During this time the Consultation Report was promoted by:-

- Radio interviews, press releases and public notices in the press
- Wide distribution of the summary leaflet
- Display boards about the LEAP which toured 8 libraries in the plan area
- Copies of the report placed on deposit at local authority offices and libraries.

## 2 Summary of responses

A total of 95 responses were received, including 38 questionnaires. Six further questionnaires were received with no name or address given. These have been included at the end of the tables.

The response was very encouraging, with those consultees that responded representing a wide cross section of interests. The written comments received and our response is included in Section 3. The questionnaire responses are incorporated in this table. The questionnaire also asked the reader to select the five most important issues and number them in priority order. Figure 1 shows the results.

All comments have been considered and where appropriate and practicable, they will be incorporated into the Action Plan, due to be published in December 1998. During the consultation process and via the responses many organisations expressed an interest in working in partnership with the Agency towards resolving the issues highlighted in the Plan. We received many helpful and welcome suggestions. Errors and omissions were also highlighted and these are included in Table 1. They will also be included as an appendix of the Action Plan. All letters and questionnaires received during and after the consultation period were acknowledged. This statement of consultation is the more detailed follow up to those acknowledgement letters.

The consultation process has given us a more detailed understanding of the issues and options presented in the LEAP and of the public's concern for the plan area. The topics that were raised most frequently and were of particular interest to consultees included:

### **Issue 8: Pollution of the water environment by new types of sheep dip chemical**

There was general support for the Agency having highlighted this problem. There was also, however, a general feeling that there should be some reference to a need to seek controls if necessary by legislation.

### **Issue 11: Possible pollution effects from the spreading of waste on land**

Support for the issue, including some concern about the landspreading of waste paper pulp.

### **Issue 15: Promotion of recreational access along river valleys**

By far the most popular issue in the plan – responses all generally support the issue, but vary widely in the nature of interest in the subject of access. Rights of local residents, sporting activities (including canoeing). There was a general agreement of the need for a strategy to deal with tourism pressure.

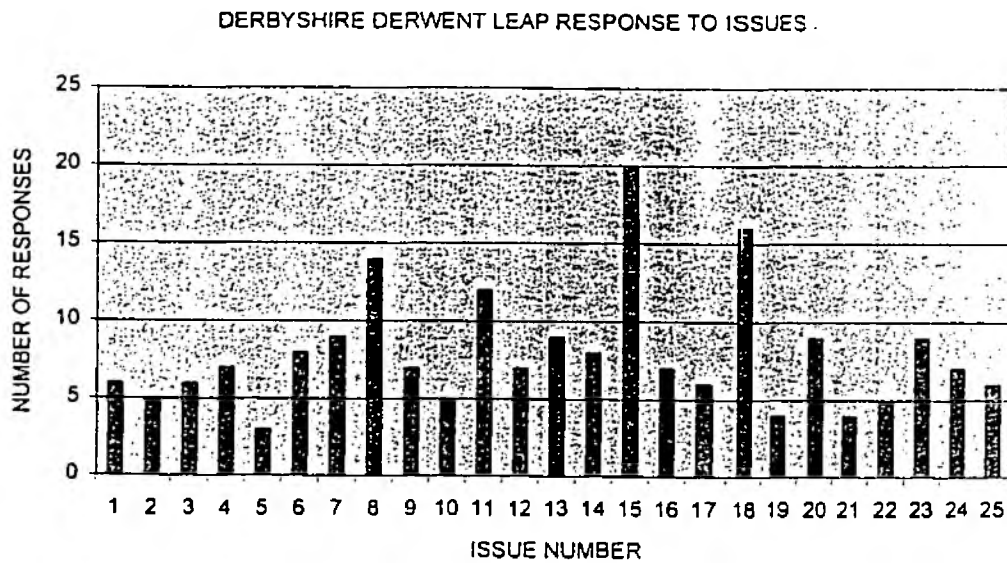


**Issue 18: Biodiversity protection**

Inclusion of this issue welcomed and generally supported. Some responses questioned the omission of mention of mink control. Information offered on clarification of responsibilities for various species, status of complementing BAPs and other plans being produced by various organisations.

These are shown in Figure 1 below, which shows the number of responses that mentioned each issue.

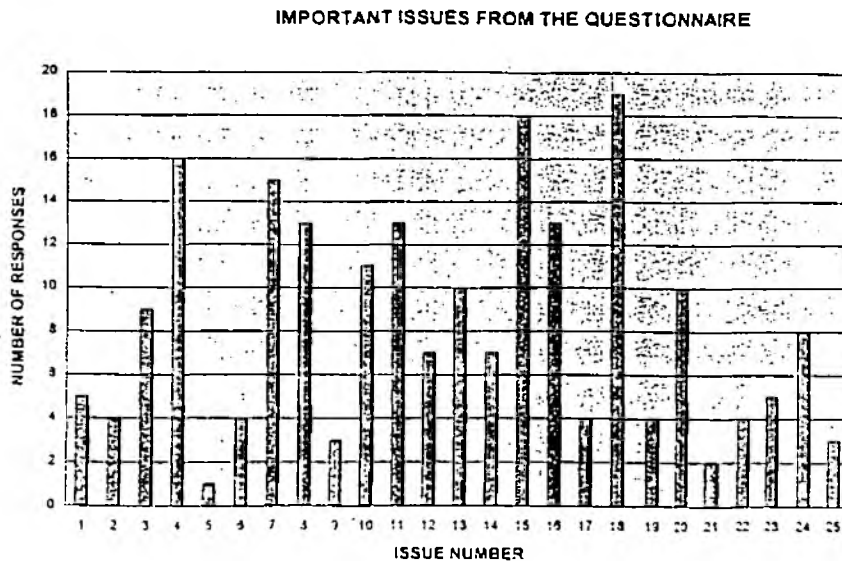
**Figure 1 – Derbyshire Derwent LEAP responses**



**Questionnaire responses**

The questionnaire sent out with the Consultation Report asked the reader to indicate which they considered to be the five most important issues in the report. Readers were asked to rank these five issues in order, numbered from 1 as most important, to 5. Figure 2 below shows the results of this exercise.

**Figure 2 – Issues selected as most important in the questionnaire.**



## 2.1 Issues in the Derbyshire Derwent LEAP

The issues in the LEAP are separated into three sections. There is no priority order implied.

### Site specific issues

These are issues that are key to a specific location in the plan area.

- Issue 1      The deterioration of Calver Weir.
- Issue 2      Historic mine workings have affected flows in the River Lathkill.
- Issue 3      The detrimental impact on water quality from wrong sewerage connections in Derby.
- Issue 4      Problems of maintaining current water quality levels in the lower Derwent.
- Issue 5      Obstructions and water quality in the River Amber limit fish distribution.
- Issue 6      Negative impact on natural brown trout populations in the Rivers Ashop and Noe caused by the operation of abstractions associated with the Derwent Valley Reservoirs.

### Plan wide issues

These issues occur in a number of locations within the plan area.

- Issue 7      Discharges to underground strata in the Carboniferous Limestone of Derbyshire.
- Issue 8      Pollution of the water environment by new types of sheep dip chemical.
- Issue 9      The lack of availability of future landfill space.
- Issue 10     The threat to water quality posed by closed landfill sites.
- Issue 11     Possible pollution effects from the spreading of waste on land.
- Issue 12     Fly-tipping of domestic waste.
- Issue 13     Loss of natural habitat to invasive plant species.
- Issue 14     The use of helicopters to spray herbicides may affect water quality in potable supply catchments.
- Issue 15     Promotion of recreational access along river valleys.
- Issue 16     The rich archaeological and historical resource of the Derwent valley requires protection.
- Issue 17     Disparity between abstraction licensing policies for surface water and groundwater.

### National issues in the plan area

These issues have a National profile, but important examples can be found in the Derbyshire Derwent plan area.

- Issue 18     Biodiversity protection.
- Issue 19     Minimisation of industrial waste generation.
- Issue 20     Minimisation of water use.
- Issue 21     Damage to the water environment and derogation caused by the operation of hydropower sites.
- Issue 22     Problems of using land identified as contaminated land.

Issue 23	The risk of flooding to undefended properties and to properties where existing flood defences require enhancement.
Issue 24	Control of the development of floodplain.
Issue 25	The inability to provide scientific interpretation due to the lack of air quality data.

## 2.2 Environmental themes

LEAPs translate the Agency's long term *'Environmental Strategy for the Millennium and Beyond'* into action on the ground.

The Strategy is based on the need to take an integrated approach to the management of the whole environment. An overview of the state of the environment at any one time can then be formed, to identify the pressures which affect that state. Appropriate responses can then be made.

The actions in each issue have therefore been linked to the appropriate environmental theme. These nine environmental themes set out in the Environmental Strategy are:

- **Addressing climate change -**
- **Regulating major industries**
- **Improving air quality**
- **Managing waste**
- **Managing water resources**
- **Delivering integrated river-basin management**
- **Conserving the land**
- **Managing freshwater fisheries**
- **Enhancing biodiversity**

## 2.3 List of organisations and individuals who made written responses to the Consultation Report

Mr S Adams, Etwall  
 Amber Valley Borough Council, Environmental Forum - Martin Rich (Env. Officer)  
 The Arkwright Society - Christopher Charlton (Secretary)  
 Bakewell Beyond 2000 - DJ Russell  
 Mrs Helene Bellofatto, Belper  
 Belper Town Council - Councillor John Harrington (Leader of the Council)  
 Mr Alastair Boden, Derby  
 Tony Bostock, (RFAC & Upper Severn AEG)  
 BCU, West Midlands Region - Mike Nicholls (Regional Chairman)  
 BCU, Carel Quaiife (National Development Officer)  
 BTCV, Neil Canham (Midshires area Manager)  
 BTO, Karl Evans (Development Assistant)  
 BW, Keith Boswell (Waterway Manager)  
 BW, North East Region - IA White (Regional Manager)  
 Broomfield College, Mr Phillips (Estate Manager)  
 Calver PC, Councillor WJ Geary  
 Civil Aviation Authority, Safety Regulation Group, Mr Harry Siepmann  
 Clean Rivers Trust, Dr Harvey Wood  
 The Coal Authority, DJ Stafford (Asst. Property Manager)  
 Mr BR Cooper, Spondon



CPRE, Derbyshire Branch, J Gidlow & NP Tompkins (1998 Derwent LEAP sub Committee)  
 CPRE, Sheffield, Peak District & S. Yorks. Branch, Dennis Patton (Director)  
 Countryside Commission, Midlands Regional Office, Tony Pike (Countryside Officer)  
 Courtaulds Chemicals, RIJ Gray (Site Director, Spondon)  
 Derby and Sandiacre Canal Trust, PN Horton-Turner (Chairman)  
 Derby City Council, Corporate Services, Andy Hills (Environmental Coordinator)  
 Derby City Council, Leisure Services, Museum and Art Gallery, WM Grange (Keeper of Natural History)  
 Derby Civic Society, Maxwell Craven  
 Derbyshire Angling Federation, S Clifton  
 Derbyshire County Angling Club, Mr OW Handley (Secretary)  
 Derbyshire County Council, Environmental Services, Richard Sandbach  
 Derbyshire Historic Buildings Trust, Dr Patrick Strange  
 Derbyshire Joint Anglers Council, G Cleveley (Hon. Secretary)  
 Derbyshire Wildlife Trust, Pete Longbottom (Conservation Officer)  
 Derwent Valley Trust, Graham Knight  
 Derwent Fly Fishing Club, Stephen Baker (Chairman, River sub committee)  
 Mr AS Dewick, South Derbyshire  
 East Midlands Rowing Council, Nige Mayglothling (Chair)  
 Elvaston PC, Mrs P Garratt  
 English Nature, Peak Dist. & Derbys. Team, Claire Trinder (Conservation Officer)  
 English Nature, East Midlands Team, Ian Evans  
 English Nature, Humber to Pennines Team, Roger Morris (Conservation Officer)  
 Exchem Plc, Derek Guilfoyle  
 FRCA, Mr AJ Bowness  
 Mrs Sheila Furniss, Littleover  
 GOEM, Mr R Charlton (Planning Team 2)  
 Govt. Office for Yorks. and the Humber, Miss J Capstick  
 Haytop Country Park, Mr H George  
 Ms Joan Hingley, Duffield  
 Hydro ACTIVE, Andy Bond  
 The ICE, Roger Dobson (Director General & Secretary)  
 The ICE, East Midlands Ass., N. Notts & N. Derbys. Branch, Mr DL Hollingsworth  
 Inland Waterways Association, Neil Edwards (Executive Director)  
 Mr Alan Jeffreys, Breaston, Derby  
 Lafarge Redland Aggregates Ltd, Mr DR Wardrop (Divisional Geologist)  
 Laporte Minerals, Mr JW Parkhouse  
 MAFF, Rural and Marine Environment Division, Mr RJ Warlow  
 Mr David Mallon, Glossop  
 Councillor John March, Matlock  
 Matlock Civic Association, KJ Parker (Secretary)  
 Midland Canoe Club, Simon Pilbeam  
 Moorway AC, Mr K Reader  
 Mortimer Wilson School, Env. Science Dept, Mr M Gander (Coordinator of Humanities)  
 NFU, West Midlands Region, Andrew Richards (Snr Technical Adviser)  
 The National Trust, The High Peak Estate Office, Stephen Trotter (Property Manager)  
 NE Derbyshire District Council, Jonathan Noad (Planning Assistant)  
 Oakbrook PC, Graham E Taylor (Clerk)  
 PDNP Authority, John Thompson (Ass. Nat. Park Officer - Head of Recreation)  
 Peak Rail Plc, J Clegg (Chairman)  
 Ramblers Ass., SYNEP Area, Allen Pestell (Access/ Countryside Officer)  
 Ramblers Ass., Manchester Area, Mrs J Cliff (Countryside Officer)  
 Ramblers Ass., Derbyshire Area, Mr DB Nicholas  
 Ms Anne Robinson, Alport Castles Farm  
 Mr K Robotham, Chellaston, Derby

RSPB, NW England Office, Patrick J Lindley (Conservation Officer)  
 Rural Development Commission, Mr G Bennett (Rural Development Officer)  
 Rural Development Commission, Tony Harvey (Regional Planning Officer)  
 Severn Trent water Ltd, John Martin  
 Shardlow PC, Mrs Eccles (Parish Clerk)  
 South Derbyshire District Council, John Birkett (Head of Planning)  
 Staffordshire Wildlife Trust, Ms R Hering (Upper Trent Otter & Water Vole Project Asst.)  
 Mr Alan Stringer, Somercotes  
 Sustrans, Midlands, Peter Foster  
 Mr Trevor Taylor, Chesterfield  
 Mrs E Thorpe, Matlock  
 Mr GW Thorp  
 Mr NP Tompkins, Brailsford  
 Transport 2000, Derbys. & Peak District Group, Chris Ryan (Chairman)  
 Ms Jenny Turville, Mackworth, Derby  
 University of Huddersfield, Dept. of Geog. & Env. Sci., Prof John Gunn  
 Yorkshire Water Services Ltd, Ed Bramley (Principal Adviser - Env. Regulation)  
 Yorkshire Water Services Ltd, Finance and Regulation Directorate, Geoff Roberts (Head of Safety, Health & Environment)

Plus a further six questionnaires with no return name or address given

**The Environment Agency gratefully acknowledges all comments received**

### 3 Responses from consultees and action taken

Comments and views expressed by consultees in response to the Consultation Report and questionnaire are listed in this section. The table is ordered by consultee name (if an individual) or by organisation. The Agency responses to the comments are in the right hand column.

#### Notes on abbreviations

AMP3	Asset Management Plan	NNR	National Nature Reserve
BAP	Biodiversity Action Plan	NRA	National Rivers Authority
BCU	British Canoe Union	NVZ	Nitrate Vulnerable Zone
BTCV	British Trust for Conservation Volunteers	OFWAT	Office of Water Services
BW	British Waterways	PC	Parish Council
CLA	Country Landowners Association	PDNPA	Peak District National Park Authority
CPRE	Council for the Protection of Rural England	R&D	Research and Development
CSO	Combined Sewer Overflow	RQO	River Quality Objective
DETR	Department of the Environment, Transport and the Regions	RSPB	Royal Society for the Protection of Birds
EC	European Council	RTA	Road Traffic Accident
FRCA	Farming and Rural Conservation Agency	SAC	Special Area for Conservation
IPC	Integrated Pollution Control	SMART	Specific, Measurable, Achievable, Realistic and Time-based
IPPC	Integrated Pollution Prevention and Control	SSSI	Site of Special Scientific Interest
LA	Local Authority	STW	Severn Trent Water Ltd
LEAP	Local Environment Agency Plan	SW	Sewage Works
MAFF	Ministry of Agriculture, Fisheries and Food	WLMP	Water Level Management Plan
NAQS	National Air Quality Standard	UWWT	Urban Waste Water Treatment
NFU	National Farmers Union	MI/d	Megalitres per day

Consultee	Comments	Issue Number/Response
Mr S Adams, Etwell	General support for all the issues. <u>Issue 15</u> – Support for access points and request for waste bins on riverside.	The Agency would be happy to work towards the disposal of riverside litter with Local Authorities.
Amber Valley Borough Council Environmental Forum (Martin Rich, Environmental Officer)	<p><b>Water Quality</b></p> <p><u>Issue 5</u> – Support for both options for action. Additional option – address pollution at source, then re-stock.</p> <p><u>Issue 10</u> – Is there a requirement to take action on the threat to water quality posed by closed landfill sites?</p> <p><u>Issue 8</u> – Toxicity of pesticide: options for neutralisation and should it be used?</p> <p><u>Issue 14</u> – Extra control in environmentally sensitive areas? Alternative application methods? Access issue. Long term land use planning i.e. afforestation.</p> <p><u>Issue 20</u> – Support for partnership in water minimisation. Severn Trent Water Ltd should continue to tackle leakage.</p> <p><b>Waste Management</b></p> <p><u>Issue 9</u> – Should the Agency be involved in producing the Derbyshire County Council Draft Strategy and the three sub groups?</p> <p>Evaluation needed of Global Environmental's Composting proposal. Networking of LA's to look at pilot schemes.</p>	<p>Support noted. The problem of water quality is addressed by the Agency in it's day to day activities. See Action 5.2 about restocking.</p> <p><u>10</u> – Under the provision of the Water Resources Act 1991, it is an offence to cause or knowingly permit poisonous noxious or polluting matter or any solid waste matter to enter into controlled waters, which include groundwaters. We would therefore seek to take action against those responsible for such pollution. We also have a responsibility under waste site licensing legislation to ensure the best possible engineering practices are employed during the construction of landfill sites in order to minimise or prevent pollution initially.</p> <p><u>8</u> – The pesticide can't be neutralised. Please see R&amp;D technical Report P170 "A Strategic Review of Sheep Dipping". Further research is needed to assess the efficiency of methods of treating spent dip, to render it less harmful to the environment.</p> <p><u>14</u> – A workshop entitled "The Environment Agency Bracken Control Workshop" was hosted by the Agency in November 1998 to discuss this issue. Presentations were followed by a series of workshops to discuss various aspects of the problem. The results of this workshop will feed into Action 14.2.</p> <p><u>20</u> – Severn Trent Water Ltd are continuing to tackle leakage problems, with high investment in overcoming the problems (see Actions 20.2. and 20.3).</p> <p><u>9</u> – The Agency is represented on the steering group. The need for landfills as an issue is being considered as part of the Derbyshire County Council Waste Management Strategy and the Waste Local Plan arising from it. The Agency will most certainly make comments on it as and when we are invited to do so.</p> <p>There is already some networking between different operators interested in composting activities.</p>

Consultee	Comments	Issue Number/Response
<p>Amber Valley Borough Council Environmental Forum (Martin Rich, Environmental Officer). Cont.</p>	<p><u>Issue 11</u> – Waste on land should be licensed by the Agency in conjunction with L.As, including agricultural spreading.</p> <p><u>Issue 12</u> – General support – the Agency should promote household collection and nearest civic amenity site, and promote to suppliers old for new scheme and make sure domestic waste is disposed of correctly.</p> <p><u>Issue 19</u> – General support</p> <p><u>Issue 13</u> – Suggestion of research in partnership. Care to be taken.</p> <p><u>Issue 15</u> – Conflict possible, for example canal restoration versus protection of habitat.</p> <p>Agency to help promote Derwent Valley Way Initiative.</p> <p>Opening up river valleys potentially destroys the attraction, accommodation of sensory/physical impairments, which may open up routes to motorcycles.</p> <p>Suggestion of introduction of wardening. Maintenance is an issue. Routing of pathways needs careful consideration.</p> <p>Transport on rivers to be considered – but not motorised.</p> <p>Agency should support the Greenways Initiative.</p> <p><u>Issue – 18</u> – General support for issue, stressing need for education and use of the planning process to protect biodiversity. Agency should promote new hedge planting.</p>	<p><u>11</u> – At present there is some control over the spreading of certain wastes to land. However there are some areas which require clarification and possibly some legislation to improve regulatory control. One of these is the spreading of wastes from animal processing. This is currently the subject of legal action by the Agency. The results are likely to impact on spreading in the Derbyshire Derwent catchment. Agricultural waste is not currently a controlled waste and is outside the waste regulatory regime.</p> <p><u>12</u> – We already do direct people to request collection by District Council or use the nearest civic amenity site. There simply aren't enough sites. We hope that this will be addressed in the County Council's Waste Local Plan. Re the "old for new" scheme, not all materials can be reused.</p> <p><u>19</u> – Support noted.</p> <p><u>13</u> – It's not research that's needed, but a strategy, in conjunction with other agencies, as outlined in the consultation report.</p> <p><u>15</u> – There may be clashes, but they will happen and usually will be sorted out by mutual agreement through the planning system.</p> <p>The Agency supported the formation of the interpretative centre at Belper, as well as picnic tables for the riverside.</p> <p>See comments above.</p> <p>Wardening, maintenance and routing of access by paths are all issues for riparian owners and Local Authorities – we have no powers.</p> <p>If transport on river is not to be motorised – is it to be horse drawn?</p> <p>The Agency has had no input to the Greenways Initiative and would welcome more information.</p> <p><u>18</u> – Support and comments duly noted.</p> <p>The Agency does promote hedge planting, but very little is done in this plan area.</p>

Consultee	Comments	Issue Number/Response
Amber Valley Borough Council Environmental Forum (Martin Rich, Environmental Officer). Cont.	<p>LAs have already created/enhanced wetlands.</p> <p>Does the Agency look towards invertebrates through the Derbyshire Entomological Society?</p> <p>Suggestion to part fund a shared worker in education helping to promote local sites.</p>	<p>We would be pleased to receive information about where LAs have created wetlands.</p> <p>We have our own aquatic invertebrate information in day to day work.</p> <p>It is unlikely that the Agency would be able to part fund any posts.</p>
The Arkwright Society (Christopher Charlton, Secretary)	<p>General overall support for document – the Arkwright Society shares many of the objectives to which the Agency commits itself.</p> <p>Assessment of heritage importance seriously inadequate in terms of the built environment.</p> <p>No mention to the fact that the area between Belper and Cromford is under review for World Heritage inscription.</p> <p>Remarks about Sir Richard Arkwright's surprise possibly unwise.</p> <p><u>Issue 15 and Issue 16</u> – Issues welcomed, but no attention is paid to the heritage sites, which owe their existence to the watercourses on which they are located.</p> <p>No recognition that a number of the river based sites may wish to use waterpower for demonstration purposes or the generation of electricity.</p> <p><u>Issue 1</u> – No reference made to consultation with English Heritage.</p> <p><u>Issue 5</u> – Concern over the observations that old mill structures create an obstruction to the migration of brown trout and that the operation of such mill weirs should be reviewed.</p> <p><u>p89</u> – Comments re the seeming schizophrenic nature of comments to those made in overview at the beginning.</p> <p><u>Issue 16</u> – Doesn't take on board the extent of problems to be faced in surveying, assessing and ultimately planning and delivering a strategy.</p>	<p>General supportive comments noted with thanks.</p> <p>We can't name all the mills and industrial buildings by name – they're too numerous.</p> <p>The idea for a World Heritage site has been spoken of for years. At the time of this consultation document it had not happened.</p> <p>Using the water supply to the national grid could not have been contemplated in this time.</p> <p><u>15 &amp; 16</u> – Ownership of the mills could not be fitted in to such a short description of the heritage value for the whole catchment. The LEAP has such a wide range of issues to cover, that content has to earn a place. The County Archaeologist was consulted and his only concern was Calver Weir. As far as we are aware there are no firm proposals for any new hydropower developments on the Derwent. We would obviously be pleased to discuss any future possibilities at the appropriate time.</p> <p><u>1</u> – Meetings have been organised by Calver PC with all interested parties invited, including English Heritage. They were at none of the meetings attended by our Area Conservation Officer. We are not leading on this issue except to assess damage. Much of the information supplied was not available to us and is just too detailed to go in the report. The only information we have is where concern has been raised about weirs.</p> <p><u>2</u> – We are quite happy that we would work with the appropriate authorities to ensure any alterations which are made to these historic weirs are in keeping with the historic structures and are made only after consultation with the County Council Planning section and with the appropriate District Council department.</p> <p><u>p89</u> – The way the document is laid out means that facts are laid out in the overview and pressures are maintained later on in the document. This is governed by guidance.</p> <p><u>16</u> – The surveying etc of all these structures is not an Agency responsibility. It will be done in partnership.</p>

Consultee	Comments	Issue Number/Response
Bakewell Beyond 2000 (D J Russell)	Information provided about Bakewell 2000, including the Bakewell Riverside Wildlife Project. The Bakewell Project will relocate the livestock market from the town centre to a site on the east of the River Wye at the northern end of the show-ground. This will allow redevelopment of the original site for shops and houses. The Bakewell Riverside Wildlife Project aims to set aside designated riverside wildlife areas.	We think that this looks a very interesting project, which we should like to be involved in. Although there may be no funds to assist from this years' budget. Our Area Conservation Officer, Val Holt, will make contact with the group to discuss proposals and investigate any ways in which we can help.
Mrs Helene Bellofatto, Belper	Objection to Amber Valley planning application for a car park along the River Derwent in Belper on existing pastureland.	The Agency has received several complaints regarding this car park at Belper. We currently have a holding objection to the planning application awaiting further information. This forms part of the wildlife corridor along the river.
Belper Town Council (Cllr J Harrington, Leader of the Council)	Questionnaire received. Issue omitted from the plan: emphasis on air and water, little or no mention of other forms of pollution, e.g., noise, traffic. At a time when the Environment and Transport departments have been brought together at national governmental level, there should be more emphasis on problems associated with traffic. This is a major concern in Belper.	The Agency has no noise control remit, except in relation to waste processes. Noise is the concern of the Local Authority. In terms of traffic related pollution, we have a duty to report on the State of the Environment, but the primary responsibility for air quality matters rests with the Local Authority. We understand that it is a major concern but we can only deal with these matters where contributions from processes regulated by us, cause a problem.
Mr Alistair Boden, Derby	<p>Questionnaire received. Negative comments about chances of vision being realised.</p> <p><u>Issue 11</u> – The general nature of the objective not supported by narrative Issue does not consider a broad enough spectrum. Use of the term “waste” implies a lost resource with no potential.</p> <p>Surely farmyard waste has great potential.</p> <p>Criticism of wording of Option for Action 11.3</p> <p><u>Issue 15</u> – Omission of Riparian Owners from Responsibilities column.</p>	<p>The Agency is at least trying to improve things.</p> <p><u>11</u> – The term “waste” is defined by the Framework Directive and is normally decided by the producer. It does not imply a lost resource with no potential, merely that the producer has no further use for it. We already consider a broad spectrum of wastes but we are constrained to work within the current legislation as far as controlled waste is concerned. There is a specific list of controlled waste materials, which can be spread to land. But the Regulations require clarification and possibly some additional legislation to improve regulatory control. We need to consider each situation in terms of the benefits and detriment. Fertilising and “improving” some agricultural land may be detrimental to Sites of Special Scientific Interest, such as rough pasture, where birds nest. The spreading of wastes from animal processing needs improved control but is currently the subject of legal action by the Agency. The result is likely to impact upon the land spreading in the Derbyshire Derwent catchment. Agricultural waste is not currently a controlled waste. Although agricultural manure can be an asset, it also has great potential for pollution. This has been demonstrated on occasion by the leaching of silage liquors and animal manures in watercourses. Wording has been improved.</p> <p><u>15</u> – Omission of Riparian Owners from the responsibilities column due to the fact that these are Agency actions</p>



Consultee	Comments	Issue Number/Response
Mr Alistair Boden, Derby Cont.	<p>Consideration should be extended beyond Riparian owners to include all who are adjacent to the access. Access to river valleys leads to disruption of wildlife habitats and crops or livestock, introduces litter, erosion of paths.</p> <p>Dangers of bathing. When things go wrong who puts them right? <u>Issue 17</u> – Concerns over unnatural fluctuations in water level in the Derwent, caused by the level of water abstraction in reservoirs. In times of drought, abstraction impacts more severely on water table levels, habitats and farmland productivity downstream. Once reservoirs are full and periods of heavy rain follow, release of water could cause unnecessary flooding.</p>	<p>The provision of footpaths for the public are always carefully considered for wildlife aspects. We have a duty to promote recreation, hence this issue. If a path is provided, then it is usually the responsibility of the Local Authority (LA) to address such issue as erosion, repair, stiles, bridges and so on. Costs are usually borne by the LA but in some cases the Agency assists. The Agency (and the NRA) have always stressed the dangers of bathing. See comments above. During drought periods, the river is supported by releases from upland reservoirs. Without these releases, flows in the river would be considerably less.</p> <p>In times of heavy rainfall, releases from the reservoirs are made to attempt to balance flows to some extent.</p>
Mr Tony Bostock (RFAU and Upper Severn AEG member)	<p>Questionnaire received. Pleased to see the quality of these publications improving. <u>Issue 5</u> – Agrees in principle but warns two things must be addressed. Firstly – certain types of fish pass allow access for undesirable species. Secondly even allowing access to more desirable species may adversely impact on the existing fish population. <u>Issue 6</u> – No reference made to the impact of reared and stocked brown trout on the genetic integrity of the natural populations. Stocking with local strain only and Section 30 permits, plus habitat enhancement strategy suggested as actions in LEAP. <u>Issue 8</u> – As well as publicising the risks related to synthetic pyrethroid dips, we should equally publicise the penalties for pollution caused by these dips. No reference in text to National Working Group looking into this problem. <u>Issue 11</u> – Farm Waste Management plans and Best Practice codes for Land Spreading need to be mandatory in future.</p> <p><u>Issue 15</u> – Rights and access of existing river users must not be adversely affected by any new proposed access.</p>	<p>Thanks! The issue has arisen because there are very few fish of any type in the area concerned.</p> <p>This point is taken account of in the National policy on trout stocking, which describes the relevant level of control of stocking of trout in different types of river with existing populations present.</p> <p>Agreed. Wording altered in Action Plan.</p> <p><u>11</u> – The issue does not make it clear if agricultural waste is being targeted. Current waste management legislation doesn't allow the Agency to regulate such waste, although we can have an impact through pollution prevention visits. With reference to industrial wastes, the Agency is currently developing guidance, which will enable us to enforce the requirements of the regulations in a consistent manner across England and Wales. Adoption of the guidance by all sectors involved in the land spreading of waste under an exemption of the Waste Management Licensing Regulations (1994) will provide the Agency and the public with a high level of assurance that both the environment and public health are being protected, irrespective of the type of waste which is being recycled in this fashion.</p> <p><u>15</u> – Riparian owners would always be consulted over anything we do.</p>

Consultee	Comments	Issue Number/Response
Mr Tony Bostock (RFAC and Upper Severn AEG member) <i>Conf'd</i>	<p><u>Issue 18</u> – Pleased to note Otter, Water Vole and Bat listed as threatened species. No reference to Badgers or Foxes.</p> <p><b>Issues omitted:</b> Drainage and surface water runoff from industrial estates – pose a serious threat to the environment.</p> <p>Eutrophication – a growing problem requiring urgent action</p> <p>Spray irrigation from surface waters – an increasing problem, with no adequate policing. Need for a more comprehensive gauging system for minimum flows before abstraction takes place. Winter storage and Best Practice for spray irrigation suggested.</p>	<p><u>18</u> – We tend to deal with the species and habitats that we have some direct influence over. Badgers and Foxes would feature in the Derbyshire Biodiversity Action Plan (BAP).</p> <p>Absolutely true – some activities will have a discharge consent serve notices – dealt with as routine by the Agency, supplemented by various campaigns such as the Oil Campaign.</p> <p>Under Issue 4 (4.2 – 4.4) the problem of eutrophication below larger sewage works is being addressed under the current UWWT EC Directive.</p> <p>There is little or no spray irrigation from the River Derwent. The policing of abstraction generally is now of a higher standard than ever before. Controls on restricted licences in the Lower Trent Area are affected by a network of gauging stations. There are odd blank spots in the catchment and this is being addressed.</p>
BCU, West Midlands Region (Mr Mike Nicholls, Regional Chairman)	<p>Questionnaire received.</p> <p>Canoeing takes place on a number of tributaries within the catchment, such as the Wye. On the Derwent there are a number of structures that are potentially unsafe for navigation (i.e. Belper East Mill Weir). Many canoeing activities on the rivers in the catchment include slalom at Matlock.</p> <p><u>Issue 15</u> – Canoeing is the largest water borne recreational activity on the river. Existing facilities and a few new access ramps River Wye – little or no official access. Winter access plans suggested (fewer disturbances to anglers). Riparian owners need to be educated by the Agency on subject of fair use by all.</p>	<p>The Agency did assist with the restoration of the canoe slalom course at Matlock. This is our contribution to canoeing on the Derwent. This is the only recreation project to gain a proportion of the very small recreation budget we are allocated.</p> <p><u>Issue 15</u> – Access agreements for canoeing can only be arranged between BCU and the riparian owner, but the Agency may assist in negotiations in certain circumstances. Portage around weirs can only be agreed with riparian owners, although the Agency would be involved in discussions.</p>
BCU (Mr Carol Quaife, National Development Officer)	<p><u>Issue 15</u> – Welcome the inclusion of work to restore the canoe slalom course at Matlock.</p> <p>Interest in the Derwent above Derby not restricted to Matlock. Wish to be able to canoe the length of the Derwent. Working with County Landowners Association (CLA) to secure agreements (without prejudice to the legal navigation status</p> <p><u>Issue 24</u> – If a canoe club or any other water-sports club wishes to build premises, it will inevitably be in the floodplain. Acknowledge that such buildings will need to be designed so as not to be an unacceptable barrier to the dissipation of floodwaters.</p>	<p>If we are approached to assist in access agreements, we will do so. We regard this as day to day work and as such does not need to go in the Action Plan as a specific action for an issue.</p> <p>The Agency publication entitled "Policy and Practice for the Protection of Floodplains" sets out the flood defence policies of the Agency in relation to floodplains and explains the reasoning behind the policies.</p>

Consultee	Comments	Issue Number/Response
BTCV (Mr Neil Canham, Midshires Area Manager)	<p>Support and endorsement of plan. Structure and endorsement of plan welcomed. Volunteers motivated by being able to demonstrate how their activity contributes to this LEAP.</p> <p>Hope that the Agency will continue to offer opportunities for consultation on the LEAP's progress. Endorsement of Agency key objective to educate and raise awareness of environment and associated issues. Active involvement and participation of the wider community suggested.</p> <p>Many issues listed where BTCV feels it can make valuable and meaningful contributions.</p>	<p>Support welcomed.</p> <p>The LEAP process will continue to consult with all parties involved in the local environment as a means of working in partnership to realise the environmental potential of the area.</p> <p>Active involvement and participation of the wider community is welcomed.</p> <p>The Agency has limited budget for many of the proposed actions and may have to use in-house workforce.</p>
BTO (Mr Karl Evans, Development Assistant)	<p><b>General comments</b> - LEAP clear and easy to understand. Agree with vision for the area.</p> <p>Issues are interlinked – summary would help highlight where costs will yield multiple benefits.</p> <p>Include timetable with issues.</p> <p>Agreed set of indicators needed for each issue.</p> <p><b>Issue 18</b> – Bird species identified as being particularly sensitive to habitat destruction and disturbance. Dipper affected by acidification of rivers and streams (reducing invertebrate food supply). Likely that populations will also be sensitive to effects of new sheep dip chemicals – specific issue?</p> <p>Other issues – Effects of overgrazing on hydrology of an upland catchment.</p> <p>Information available on distribution and abundance of birds and local and national scales.</p>	<p>Agreed – future LEAPs will hopefully incorporate this.</p> <p>All LEAPs now being produced (to Guidance Version 3) do include a rough timetable and indicative costs.</p> <p>Indicators are being researched nationally and will eventually be used as an aid to monitoring the LEAP process.</p> <p><b>18</b> – In the Action Plan we should have addressed the sheep dip problem in relation to the Biodiversity issue (see issue 8). This will be addressed in the annual review by cross referencing. We will be investigating the question of acidification and will amend the issues where necessary.</p> <p>The Agency is looking into this.</p> <p>Many thanks for the information.</p>
BW (Mr Keith Boswell, Waterway Manager)	<p>Questionnaire received.</p> <p><b>Issues excluded:</b> more recognition of the navigational opportunities that could be created, with links to the River Trent.</p> <p>Any reduction in our abstraction in the River Derwent can affect the River Trent navigation. Would wish to be consulted on such a scheme.</p> <p>Also have responsibility for the Trent and Mersey Canal within the catchment.</p>	<p>Noted.</p> <p>The licensing policy for the River Derwent with prescribed flow restrictions is clearly defined in the Water Resource Local Policy Summary for the Lower Trent (including the River Derwent) Area. Issue 17 seeks to adopt a policy for groundwater abstractions, which could positively affect surface flows.</p> <p>Noted.</p>
BW, North East Region (Mr I A White, Regional Manager)	<p>Comments made with the regard to the impact of the River Derwent on the River Trent</p> <p>There is a public right of navigation but no navigation authority.</p>	<p>Comments noted.</p> <p>This should not cause a problem.</p>

Consultee	Comments	Issue Number/Response
BW, North East Region (Mr I A White, Regional Manager). (Cont)	<p><u>Issue 3</u> – BW strongly supports this issue. Impact of water quality downstream of Derby can have adverse impact on the Trent.</p> <p><u>Issue 4</u> – Water quality levels should be maintained, if not improved, again to enhance the River Trent.</p> <p><u>Issue 17</u> – Need for an integrated licensing policy to ensure that a viable appropriate demand can be met and appropriate minimum water levels are maintained in the Derwent.</p> <p><u>Issue 20</u> – BW supports this.</p>	<p>Noted.</p> <p>Noted.</p> <p>There is a surface licensing policy with minimum flow (not level) conditions already in force. Generally, levels are maintained by existing weirs and so on in the river.</p> <p>Noted.</p>
Broomfield College (Mr Phillips, Estate Manager)	<p>Questionnaire received. <b>Issues omitted</b> include: the effects of farming on water quality of rivers and tributaries</p> <p>Methods of solving detailed actions to improve biodiversity.</p> <p>Comments like “management of riparian habitat” need further explanation. What type of management?</p>	<p>This is covered by much of the day to day work of the Agency.</p> <p>Detailed actions to improve biodiversity are included in the Action Plan. The consultation aimed to consult on varied options for action.</p> <p>Management of riparian habitats means ensuring that management takes account of all aspects to enhance the ecology of the watercourse.</p>
Calver PC (Cllr W J Geary)	Major concern is the deteriorating condition of the Calver Mill Weir (Issue 1). Urge that this project be given a high priority.	Discussions between parties are ongoing.
Civil Aviation Authority, Safety Regulation Group (Mr Harry Stepmann)	<p>Concern the re safeguarding of East Midlands airport from the risk of birdstrikes.</p> <p>Within a 13 km radius area, advice of Aviation Authority to be sought.</p>	<p>Concern is noted. We will make sure that the Action Plan makes this clear.</p> <p>Noted.</p>
Clean Rivers Trust (Dr Harvey Wood)	<p>Questionnaire received. <b>Issues omitted</b> include: Closure of the deep coal mine industry would need to be considered, if pumping ceased, minewater from “ancient” (pre 1800) workings would appear from Clay Cross to south of Ripley. The minewater issues are a very major threat in the exposed coalfield. Metalliferous mining has created small pollutions in Buxton and around Castleton (Odin Mine).</p> <p>It is a very well put together report.</p>	<p>The Agency acknowledges that the abandonment of mines is an issue for the Lower Trent Area, but is not seen as a threat to this lead area. It is being considered in a Region wide overview.</p> <p>Thanks!</p>
The Coal Authority (Mrs M J Stafford, Asst. Property Manager)	Report acknowledged. No comments made.	-
Mr B R Cooper, Spondon	<p>Questionnaire received.</p> <p>Generally agree with the vision for the area, what is the definition of “enhancing”? Altering the present to a Utopian view of past conditions?</p> <p>Issues omitted include visibility of the river in Darley Park.</p>	<p>We believe “enhance” means to improve, not to perfect. Through our actions we believe that improving biodiversity even in a small way enhances the environment overall.</p> <p>We aren't sure what is meant by this. If trees obliterate the view, we could not possibly look at felling to improve visibility. Is it a safety issue? Unable to comment further without more information on the problem.</p>
CPRE, Derbyshire Branch (J Gidlow & N P Tompkins, 1998 Derwent LEAP sub committee)	<p>Comments confined to plan area south of Wye confluence</p> <p><u>Waste</u> – disposal quotes a figure of over 1m tonnes – how much over?</p>	<p>Noted.</p> <p><u>Waste</u> – we don't have accurate figures for the plan area, only for the county.</p>

Consultee	Comments	Issue Number/Response
<p>CPRF, Derbyshire Branch (J Gidlow &amp; N P Tompkins, 1998 Derwent LEAP sub committee) (Cont'd)</p>	<p><u>Water quality</u> – Bottle Brook – there should not be an acceptance of “significant quantities of sewage effluent” etc. With a small tributary it should be possible to identify individual causes and agree improvements. Is this a correct understanding of the situation?</p> <p><u>Water resources</u> – Net loss of water (supplies feeding Sheffield etc) should not be allowed to increase to a point where further loss of countryside through reservoir construction is required (P16). Concern over loss of aquifer storage due to limestone quarrying.</p> <p><u>Issue 3</u> – Must be sorted eventually – priority given to greatest hazard to public health.</p> <p><u>Issue 4</u> – Will the proposed abstraction by STW Ltd. Remove this problem or just alleviate it?</p> <p>Will the new sewer network being construction to the southern suburbs of Derby remove the need for additional abstraction recently applied for?</p> <p><u>Issue 7</u> – New action suggested – official information gathering by recorded delivery letter and returns.</p> <p><u>Issue 8</u> – Option 8.1 – additional sampling required at times of sheep dipping.</p> <p><u>Option 8.2</u> – Require manufacturers and distributors to help advise farmers.</p> <p><u>Option 8.3</u> – Annual visits should not be necessary once sheep dip location sites agreed. Extra action suggested – require licences for use and simple returns.</p> <p><u>Issue 9</u> – Endorsement of issue. Extra action suggested: examine more closely the suitability of landfill sites in river gravel areas.</p> <p><u>Issue 10</u> – Endorsement of issue.</p> <p><u>Issue 11</u> – The issue of all aspects of land spreading as a means of waste disposal to be addressed.</p>	<p><u>Water quality</u> – Water Quality in the Bottle Brook is meeting its long term RQO. Quality is considered appropriate for its use. Previous negotiations with STW Ltd have resulted in improvements to the treatment works to achieve the current standard. In other words, yes.</p> <p><u>Water resources</u> – No further reservoir construction is planned. We also have concerns, but control of quarrying activity lies with the relevant planning authority.</p> <p>Agreed – noted.</p> <p>Will have no impact.</p> <p>These are two completely unrelated issues.</p> <p>Might not be a practical option on the ground.</p> <p>Good idea. Additional targeted sampling was carried out in late July / August (after the July dip). Further sampling is planned.</p> <p>This is what the option entails.</p> <p>Suggestions noted.</p> <p>9 – We assume you mean Shardlow. These are storage areas not landfill sites.</p> <p>Noted.</p> <p>11 – The Agency can only address those wastes specified as “controlled”.</p>

Consultee	Comments	Issue Number/Response
<p>CPRE, Derbyshire Branch (J Gidlow &amp; N P Tompkins, 1998 Derwent LEAP sub committee). Cont.</p>	<p><u>Issue 12</u> – The greatest problem is the abuse of any facilities provided by unscrupulous small businesses.</p> <p><u>Issue 13</u> – Suggestion of enlisting local environmental organisations to help clear infestation on public property, such as riverbanks.</p> <p><u>Issue 15</u> – Aim for best practice possible – quality of life for local residents should not be reduced by these proposals.</p> <p><u>Issue 16</u> – Support for strategy.</p> <p><u>Issue 17</u> – Needs to be a limitation to further valleys lost to reservoir construction.</p> <p><u>Issue 18</u> – Best practice needed.</p> <p><u>Issue 21</u> – Review criteria for operation of hydropower units, tighter control of parameters will ensure baseline flow requirements. Introduce co-operation and discussion amongst operators to avoid flow imbalance and reduced power generation.</p> <p><u>Issue 22</u> – Support for issue. Adoption of Direct Toxicity Assessment should not reduce measurement of individual contaminant levels.</p> <p><u>Issue 23</u> – Protection to properties should be sympathetic to the location. Need for floodplain allowance for existing settlements, but if volume and speed of water discharge from urban areas and fields continues to increase the level of fortification required will assume medieval proportions. Need to improve inner city area for housing to reduce need for green field sites elsewhere. No further large-scale house building should be allowed in the 100-year floodplain.</p> <p><u>Issue 24</u> – Comments as for issue 23 above.</p> <p><u>Issue 25</u> – Also establish links with universities that have courses covering this aspect, provide locations for measurements, benefiting both organisations.</p>	<p><u>12</u> – Just one of the problems, more of a problem for site operators. Not an issue for us.</p> <p><u>13</u> – Volunteers cannot be used to spray herbicides – they need to be certified.</p> <p><u>15</u> – Agreed – this is what we are aiming for!</p> <p>Noted – thanks!</p> <p><u>17</u> – The Agency has no knowledge for future proposals for the construction of reservoirs.</p> <p><u>18</u> – Agreed.</p> <p><u>21</u> – The Agency is also concerned about the effects of hydropower activities on river flows. We will seek to protect river flows through the enforcement of the operating agreements.</p> <p><u>22</u> – Support noted. Only utilised in isolation following a period of validation to ensure confidence in the relationship between toxicity method and potential contaminants.</p> <p><u>23 / 24</u> – The current design of flood defences is that they are in keeping with the surrounding area. It is not considered that the proposed reconstruction of the flood defences between Wilmorton Railway Bridge and Spondon will have any perceivable effect on downstream water levels. The Agency's aim is to control development on floodplains and it seeks to persuade Planning Authorities initially through the Development Plan process, then via Development Control, to guide development away from floodplain areas.</p> <p><u>25</u> – The Agency is keen to work in partnership with other organisations, including universities. The possibility of collaboration on air quality work should also be included in this.</p>



Consultee	Comments	Issue Number/Response
<p>CPRE, Sheffield, Peak District &amp; SoSouth Yorks. Branch (Mr Dennis Patton, Director)</p>	<p>Support for key objectives of the plan.</p> <p><u>Issue 6</u> – Not clear where 17M1/d discharged into Jagers Clough comes from. Dry riverbeds should be avoided.</p> <p><u>Issue 7</u> – Essential to prevent any discharges into this vital aquifer.</p> <p><u>Issue 8</u> – Essential to prevent these sheep dips entering the watercourses and inspect / provide advice.</p> <p><u>Issue 9</u> – Merely extending tips is not a solution to the broader issue of waste reduction.</p> <p><u>Issue 10</u> – More formal control of leachate pollution from landfill sites must be sought.</p> <p><u>Issue 11</u> – Particularly concerned re waste coming from outside the plan area.</p> <p><u>Issue 14</u> – Further research needed into Bracken control. Asulox may be “low toxicity to mammals” but human proximity while spraying not recommended.</p> <p><u>Issue 22</u> – Vital to establish after use for areas identified as contaminated land – to take pressure off green field development</p> <p><u>Issue 25</u> – Poor air quality now recognised as a major threat to public health. Ozone levels in the Peak District can exceed levels in the urban areas. More data collection points required. Standards in need of review.</p> <p><u>Partnership</u> – CPRE welcomes the partnership approach and is pleased that the Agency is a member of the Sheffield Environment Forum.</p>	<p>Issue Number/Response</p> <p>Noted – thanks.</p> <p><u>6</u> – The 17M1/d compensation flow into Jagers Clough was contained in the Derwent Valley Water Act 1944 (Section 9). It comes from Ladyhowe Reservoir. It is part of the conditions contained in Severn Trent Water Licence Serial Number 3/28/38/18/S/R. This can only be removed by variation of the licence. Discussions are ongoing with Severn Trent Water Ltd on this issue.</p> <p><u>7</u> – Not possible. Not within Agency’s remit. We have to look at environmental impacts and weigh cost benefits of absolute prevention against the potential impact of authorised discharges.</p> <p><u>8</u> – Agreed entirely! We prosecute if necessary.</p> <p><u>9</u> – Agreed. That’s what the issue is saying (see Option 9.2).</p> <p><u>10</u> – Statutory powers exist to do this with existing sites. With closed sites we rely on goodwill or where we can demonstrate that pollution has occurred. Future contaminated land Regulations may alter the balance and provide us and LAs additional powers.</p> <p><u>11</u> – Concerns noted.</p> <p><u>14</u> – R &amp; D project underway. A workshop entitled “The Environment Agency Bracken Control Workshop was hosted by the Agency in November 1998 to discuss this issue. Presentations were followed by a series of workshops to discuss various aspects of the problem. The results of this workshop will feed into Action 14.2.</p> <p><u>22</u> – Agreed. See objective of issue in Action Plan.</p> <p><u>25</u> – it may be appropriate to examine the provision of data on ozone in the plan area as part of this issue. The level of ozone, which should be achieved, has been set out in the National Air Quality Standards (NAQS). An Environmental Protection Air Quality Standard objective has been set for achievement by 2005.</p> <p>Noted.</p>

Consultee	Comments	Issue Number/Response
<p>Countryside Commission, Midlands Regional Office (Mr Tony Pike, Countryside Officer)</p>	<p>Co-ordinated response from Manchester and Birmingham Office. Pleased to see that the report refers to the Countryside Character initiative. Concerned that insufficient consideration is being given to opportunities for applying the concept to the conservation and enhancement of the landscape in the Derwent catchment.</p> <p><u>Vision</u> – would like to see main aim amended as follows: "...whilst maintaining and enhancing its <b>distinctive character, quality accessibility and the diversity of flora and fauna</b>".</p> <p><u>Key objectives</u> – additional objective suggested: "conserve and enhance countryside character, quality and accessibility"</p> <p><u>Landscape</u> – revised heading suggested: "Wildlife, Landscape and Cultural Heritage".</p> <p>Derbyshire County Council are using a character led approach to develop landscape guidelines (due to be published early 1999). Of relevance to the Agency which is responsible for and can influence development in the countryside.</p> <p><u>Land Management</u> – essential role to play in ensuring that important features are protected as part of a sustainable rural economy. Features such as field size, field boundaries and tree cover all play a part in creating local character.</p> <p><u>PPG7</u> – highlights the importance of enriching the quality of the whole of the countryside. LEAPs can and should play a strategic role in encouraging appropriate management by all those with a contribution to make.</p> <p><u>Protected landscapes</u> – more reference needed later in the plan to the need to conserve and enhance the Peak District National Park.</p> <p><u>Recreation and green corridors</u> – need to acknowledge that the Derwent is an important recreational resource for residents as well as visitors. Commission supporting Derby City Council Riverlife Project as a Green Corridors initiative. Should be taken into account by The Agency in any plans or work.</p> <p>Issues – landscape suggested as an extra issue.</p>	<p>Concern noted – but we don't have any direct involvement with landscape issues. The only times that we get involved with landscape issues is through major flood defence works and planning consultations. Where the former landscape will be dealt with within the Environmental Impact Assessment.</p> <p>Suggestion noted. The wording for the vision has emanated from National Guidelines and we can't do this.</p> <p>Suggestion noted.</p> <p>Suggestion noted.</p> <p>Information noted with thanks.</p> <p>We do not have information relating to field size or field boundaries.</p> <p>Agreed – at the end of the day, a sustainable approach to development will be achieved through re-education and rethinking the way in which land management and land use are implemented.</p> <p>Protecting the local landscape is a planning issue and as such may be something the Agency cannot itself undertake. We can only hope to influence the process through land drainage consents and planning liaison.</p> <p>Noted.</p> <p>Derby City Riverlife Project is supported by the Agency (our staff sits on the Steering Board). It is therefore taken into account.</p> <p>Suggestion noted, but this is not appropriate as we have no responsibility for landscape issues.</p>
<p>Countryside Chemicals (R J Gray, Site Director, Spondon)</p>	<p>Questionnaire received. No reference made to IPPC, which will bring additional operations under Agency control. Impact of this issue should be included.</p>	<p>See Section 5.3.2 in the Action Plan.</p>
<p>Derby &amp; Sandiacre Canal Trust (P N Horton-Tinner, Chairman)</p>	<p>Number of comments already made in earlier correspondence. Formal support for response from Inland Waterways Association.</p>	<p>No trace of any correspondence on this LEAP sent to LEAP Planner. Noted.</p>

Consultee	Comments	Issue Number/Response
Derby City Council, Corporate Services (Mr Andy Hills, Environment Co-ordinator)	<p><b>Report to environment committee.</b></p> <p>Supportive of general principles behind development of the LEAP and will endeavour to work with the Agency to jointly agree timetables for action and clear targets.</p> <p>Clarification still required as to the strategic role of LEAPs in relation to other plans.</p> <p><u>Issue 3</u> – Which watercourses within the city are threatened with this specific problem? Chaddesden Brook, Littleover Brook and Bramblebrook suggested.</p> <p><u>Issue 9</u> – Clear links with issue 19 need to be highlighted.</p> <p><u>Issue 10</u> – There are more than two closed landfill sites in the plan area, including the former Darley tip in Darley Abbey (transferred to City as part of the Unitary status).</p> <p><u>Issue 13</u> – Need to make private landowners aware of the issues around invasive plant species and the management techniques needed to control them. This is especially pertinent because of the fact that certain chemicals can be applied adjacent to watercourses, and specialised certificated staff are required to apply the chemicals.</p> <p><u>Issue 15</u> – Limited to tourism strategy for the Derwent Corridor. Cycling, canoeing and fishing can also take place along the river, some of which need promoting and some of which need controlling. Some areas of the Derwent already suffer overuse. Need creative management plans to divert pressure to other sites. Consider footbridges to maximise full recreational potential.</p> <p><u>Issue 17</u> – Concern about the effect of abstractions on ecological and visual aspects of the Derwent and its tributaries - would wish to be involved in any discussions on Agency work in the area.</p> <p><u>Issue 18</u> – Water voles – mention mink in relation to water vole conservation.</p> <p><u>Bats</u> – Both areas of advice / information are already available.</p> <p><u>Crayfish</u> – Key role of LAs in habitat protection.</p>	<p>Noted.</p> <p>See Section 1.2.1 in the Action Plan.</p> <p>Agreed.</p> <p>9 – Agreed.</p> <p>10 – Those referred to were simply good examples of the potential problem which exists.</p> <p>13 – The Agency has a leaflet on Japanese Knotweed, Himalayan Balsam and Giant Hogweed, available to any member of the public. It is not intended that the Agency will take on the role of contacting every riparian owner. We would hope that the City Council could inform us if they want to take action in any specific area, and that any herbicide programme would be a joint project.</p> <p>15 – Noted</p> <p>We understand recreational aspects relating to Derby City are dealt with at the Project Riverlife / Greenstep Forum meetings. Since all recreation and conservation bodies are able to discuss issues, perhaps it would be helpful if the City commenced dialogue about any new river crossing for pedestrians in Derby.</p> <p>17 – Concerns noted – the licensing policy for the River Derwent with prescribed flow restrictions is clearly defined in the Water Resource Local Policy Summary for the Lower Trent (including the Derwent) area. Issue 17 seeks to adopt a policy for groundwater abstraction, which could affect surface flows positively.</p> <p>18 – There are many factors relating to the decline in water vole numbers. Water quality and habitat loss remain the main factors – it was not considered that mink were the sole factor, hence no reference was made to them. There have been no surveys of mink in the area, so it would have been anecdotal that they are solely to blame. The Agency publishes a leaflet on mink control, which may be of use to riparian owners.</p> <p>English Nature have published information on bat protection, but the Agency needs to act when giving consents on culverts and bridges which may involve bat habitat. If the City Council produces leaflets relating to bats and development, perhaps they could furnish the Agency with copies.</p> <p>LAs have a major role to play in protecting crayfish habitat, as they have the power to request environmental assessment on any development.</p>

Consultee	Comments	Issue Number/Response
Derby City Council, Corporate Services (Mr Andy Hills, Environment Co-ordinator). Cont.	<p><u>Birds</u> – Agency staff (including those that work on behalf of the Agency) need to be educated not to disturb birds during the breeding season.</p> <p><u>Habitats</u> – sensitive management required of marginal vegetation and waterside trees.</p> <p>Agency policy on <u>tree planting</u> to be set out.</p> <p><u>Issue 20</u> – fully support issue. Reduction in water demand to be sought from a wide range of different sectors as well as domestic and Part A Industrial users.</p> <p><u>Issue 22</u> – suggest objective written as “to assist in bringing back into full and appropriate use, areas identified as contaminated land”.</p> <p><u>Issue 23</u> – greater stress should be placed on the potential environmental/ecological impact of any Agency works carried out in the area.</p> <p><u>S.4.6</u> – City Council is producing a Local Plan and a Structure Plan (in consultation with the County Council), not a Unitary Development Plan.</p> <p><u>S.4.4</u> – Interpretation of the river should be added to the report. Suggestion of display boards of river through City.</p> <p><u>S.5.6</u> – Mention should be made of importance of agricultural activity on watercourses (especially ploughing, spraying and crop planting close to the riverbank).</p> <p><u>Table 8</u> – projected long-term quality objectives identified for the majority of the rivers in the catchment do not differ greatly from their status.</p>	<p>The Agency does <u>not</u> carry out any tree work during the breeding season.</p> <p>All marginal vegetation and trees are sensitively managed by the Agency. All flood defence works have an environmental assessment carried out. However, riparian owners or lessees often carry out bank side works without reference to the Agency or to the planners.</p> <p>The Agency has no policy to plant trees along the Derwent, but we would do if we had works that would benefit by additional trees, such as the gauging station at Ashford on the Wye. We do face up trees to prevent trees falling over, and we pollard where necessary. Our policy is to preserve the trees that are there, but we do have to remove trees that are in danger of falling.</p> <p><u>20</u> – noted.</p> <p><u>22</u> – Suggestion noted.</p> <p><u>23</u> – During the design of flood defence schemes the Agency's Fisheries, Ecology and Recreation staff are fully consulted regarding the potential environmental/ ecological impact of the works and appropriate mitigation works are included as necessary.</p> <p>Correction noted.</p> <p>The City Council's Project Riverlife and Greenstep Project has produced boards and leaflets in conjunction with the Agency that relate to recreation and conservation aspects of the river.</p> <p>Agreed.</p> <p>Targets are set in association with use and are adequate for that use. Use for the most part in the Derbyshire Derwent plan area is for potable supply – which requires higher environmental standards than for other uses.</p>
Derby City Council, Leisure Services, Museum and Art Gallery (Mr W M Orage, Keeper of Natural History)	<p>Overall a good and positive report.</p> <p>Several issues raised in earlier response (to issues consultation) have not been incorporated.</p> <p><u>Issue 15</u> – mention angling in relation to pressures on bankside habitats and conflict with fish predators, including cormorants and goosanders.</p> <p><u>Issue 18</u> – <u>mammals</u> – mention control of mink in relation to water vole.</p>	<p>Thanks!</p> <p>Comments made on the issues consultation were incorporated wherever possible:</p> <p><u>15</u> – This means anglers are a problem? The Agency was unaware that there were waters with cormorants in them in the plan area. We only found out about the goosanders when we were approached by FRCA (after the plan was written).</p> <p><u>18</u> – The control of <u>mink</u> is not an Agency responsibility and we would not like to lay blame on them unless we have scientific evidence that they are the main predator. We won't know until we survey for them.</p>

Consultee	Comments	Issue Number/Response
<p>Derby City Council, Leisure Services, Museum and Art Gallery (Mr W M Grange, Keeper of Natural History) (conf'd)</p>	<p><u>Habitats</u> – mention protection of the immediate riverside habitat, including marginal vegetation and waterside trees. Particularly with reference to flood protection works/ bank protection.</p> <p><u>Issue 23</u> – Greater stress to be placed on potential environmental/ ecological impacts of such works.</p> <p><u>Additional points</u> – impact of agricultural development on ecology of watercourses (especially where crop production is carried on right up to the banks – habitat destruction/ run off of pesticides). Major factor in decline of biodiversity is the mismanagement of riverside habitats – should be acknowledged. Enhancing the riverside habitat for more than just otters.</p>	<p>The protection of riverside <u>habitats</u> is undertaken routinely by the Agency with all flood defence works</p> <p>23 – During the design of flood defence schemes the Agency's Fisheries, Ecology and Recreation staff are fully consulted regarding the potential environmental/ ecological impact of the works and appropriate mitigation works are included as necessary.</p> <p>The Agency cannot control non-point discharges, so it is difficult to measure any damage caused.</p> <p>We assume here that you are talking about Derby. See Actions 18.3 and 18.4 (enhancing habitats).</p>
<p>Derby Civic Society (Mr Maxwell Craven).</p>	<p>Questionnaire received.</p> <p><u>Addition to vision</u> suggested: "enhancing the diversity of flora and fauna as well as protecting sites and monuments and co-ordinating the protection of historic structures".</p> <p><u>Other issues to be included</u> – a strategy is needed to address the interpretation of sites, which would presuppose the encouragement of research (and publication) into sites. Protection of historic buildings needs co-ordination. The areas' LAs have diverse approaches to heritage conservation, especially as regards to conservation areas and listed buildings. These need to be brought into line with a common policy. Most of the area was re-assessed with regards to listed buildings in the early 1980s. Derby (like Leicester) was omitted from this process. Derby contains a large proportion of important buildings/ sites, many of which need to be re-evaluated. Locally attempts to spotlight are not really effective. Liaison required in this context with English Heritage, RCHM(E)?, Georgian Group, Victorian Society and Derby Civic Society.</p> <p><u>Major error or omissions</u> – Neither the archaeology nor the architecture of the area have been adequately researched or assessed.</p> <p>2.4.2 (p12) – traditional dry stonewalling is now known to date back to Roman-British period.</p> <p>Neither Chatsworth nor Haddon can be described in any way as neo-classical; one is baroque, the other medieval. Kedleston Hall is neo-classical and largely by Robert Adam.</p> <p>Poole's Cavern also has an important archaeological dimension.</p> <p>Emphasis on conservation is towards nature and seems to neglect built environment and man-made landscape.</p>	<p>Suggestion noted.</p> <p>These points are valid. They should all be addressed via the Local Authority planning policies, over which the Agency may have no influence.</p> <p>Point taken.</p> <p>Noted.</p> <p>Apologies for the error. We must have picked up the wording from a text somewhere.</p> <p>Point taken.</p>

Consultee	Comments	Issue Number/Response
Derbyshire Angling Federation (S Clifton)	<p>Questionnaire received.</p> <p>Agree with the plan for the Derwent, but not in any way should this be a detriment to angling. Have fought pollution for years and stocked the river with fish to provide a better environment for everyone.</p> <p><u>Other issues to be included</u> – more consideration to be given to anglers and angling clubs.</p> <p><u>Major errors/ omissions</u> – have had the fishing rights on the River Derwent for 66 years and did not know of these proposals until read about them in the newspaper.</p>	<p>Many thanks for the support. The Agency's aim is to provide a better environment, both for the present and the future</p> <p>We aim to balance the interests of all users of the environment.</p> <p>We apologise for the oversight. The newspaper coverage was aimed at reaching people just like yourselves!</p>
Derbyshire County Angling Club (Mr O W Handley, Secretary)	<p>Questionnaire received.</p> <p>The vision is desirable, but is the reality attainable without adequate financial input? What is the timescale? There appear to be too many constraints in terms of costs/ resources to make this exercise any more than visionary or academic.</p> <p><u>Cormorant predation</u> – urgent action required to control this bird to protect inland fisheries.</p> <p><u>Eutrophication</u> – the problem on the Lower Derwent is not just caused by sewage but also by flood defence work (i.e. regrading of riverbed resulting of increased velocity of flow with reduced volume causing minimum dilution of sewage).</p> <p><u>Abstraction Licences</u> – on the Derwent should be reviewed. Any not fully justified should be withdrawn and no new licences should be issued except in very special circumstances.</p> <p><u>Restoration of Salmon</u> – to the River Trent and its Tributaries. After nine years of opportunistic approach policy and no progress. Positive action should be taken on a phased 10 year forward programme of work to incorporate fish passes/ ladders in weirs etc. and budgeted for annually.</p>	<p>This was a draft version. The Action Plan presents a number of costed actions, which will take place over the next five years. This plan will be monitored annually, after which the whole plan will be revised.</p> <p><u>Cormorants</u> – the Agency was unaware that there were waters with cormorants in them in the plan area.</p> <p><u>Eutrophication</u> – there has been no regrading of the River Derwent, nor is any currently proposed. However, some shoal removal has been carried where necessary. Due to the limited scale of this work there should be no effect eutrophication. Dilution will be the same regardless of velocity.</p> <p><u>Abstraction Licences</u> – the Government has called for a review of the licensing system. As a result of this there may be scope for the reduction or revocation of licences where it is necessary. It should be understood that without the releases of water to the Derwent from the Ladybower and Carsington Reservoirs, there would be occasions when flows in the river would be severely depleted.</p> <p><u>Provision of salmon passes</u> and improved water quality provides a suitable habitat for the return of salmon, but a programme of re-introduction will be required to assist re-colonisation. The first batch of salmon were reintroduced to the Trent catchment in early October 1998. Further introductions are planned.</p>
Derbyshire County Council, Environmental Services (Mr Richard Sandbach)	<p>Environmental Services Committee resolved to support proposals set out in the LEAP.</p> <p><u>Issue 1</u> – extend to consider all such structures in the plan area that might require preservation (Belper Mill Weir)</p> <p><u>Issue 8</u> – it is felt that the Agency should regulate the use of sheep dip chemicals rather than take measures to clean up pollution incidents.</p> <p><u>Issue 9</u> – the Waste Management Strategy will provide a context for the Waste Local Plan, which will address the issues of civic amenity sites and the identification of new landfill sites.</p>	<p>Support noted.</p> <p><u>1</u> – Calver Weir has been mentioned because it has been identified to the Agency as an issue. We did not know of any problems at other weirs.</p> <p><u>8</u> – Please see R&amp;D Technical Report P170 "A Strategic Review of Sheep Dipping". Further research is needed to assess the efficiency of methods of treating spent dip to render it less harmful to the environment.</p> <p><u>9</u> – the Agency will be very interested to see the Waste Local Plan. See Actions 9.1 and 9.2 in the Action Plan.</p>



Consultee	Comments	Issue Number/Response
Derbyshire County Council, Environmental Services (Mr Richard Sandbach) (conf'd)	<p><u>Issue 11</u> – Support for an investigation into the potential of landspreading of waste on land to harm human health and to cause pollution.</p> <p><u>Issue 12</u> – A co-ordinated approach to fly-tipping needs to be agreed between all responsible bodies.</p> <p><u>Issue 13</u> – The occurrence of alien invasive plant species on road verges may also be important as they may spread to the aquatic environment via surface water drainage.</p> <p><u>Issue 15</u> – The County Council is involved with other agencies through the Derwent Valley Trust in identifying potential long distance paths for walkers, cyclists and horse riders. The County Council supports the provision of wider public access to river valleys but considers the issue of balancing the promotion of access with the need to minimise environmental impacts should be applied to the wider countryside, not just to river valleys. The issue of access for canoeists needs to be addressed on similar principles.</p> <p><u>Issue 16</u> – The County Council as Mineral Planning Authority requires an archaeological appraisal of proposed mineral extraction site as part of any planning application. Where applicable, detailed archaeological investigation and recording are also required.</p> <p><u>Issue 18</u> – where the LEAP refers to BAPs, which cover the Derbyshire Derwent area, it should be made clear that these are Local BAPs. The County Council's Countryside Service has involvement with a number of the species and habitats mentioned in the LEAP. The Agency is requested to keep this authority informed of progress and proposals so that the County Council can co-ordinate action where appropriate.</p> <p><u>Issue 19</u> – support for the minimisation of waste by the Agency.</p> <p><u>Issue 20</u> – support for the promotion of the conservation of water resources through careful use.</p> <p><u>Issue 23</u> – would like to see more information on the current state of proposals for flood defence works within the LEAP area.</p> <p>Derbyshire County Council has instigated a flood warden scheme in Bakewell and other areas.</p> <p><u>Issue 25</u> – Available meteorological and traffic flow data can be used as a predictive tool in place of direct measurement, particularly when dealing with traffic pollution.</p>	<p><u>11</u> – We welcome the support offered by the County Council on this issue.</p> <p>As with Issue 9, we would be very interested in the Waste Local Plan arising from the Waste Management Plan and its implications relating to this issue.</p> <p><u>13</u> – We note the details of the response and are very pleased about the recognition of the problem.</p> <p><u>15</u> – We agree.</p> <p>Support noted – we only have powers relating to the river environment.</p> <p><u>16</u> – good.</p> <p><u>18</u> – noted.</p> <p><u>19</u> – support noted and welcomed!</p> <p><u>20</u> – support noted and welcomed!</p> <p><u>23</u> – the feasibility of defending properties at risk in Bakewell and Rowsley is progressing. The design of new flood defences between Wilmorton Railway Bridge and Spondon south of Derby is complete and the scheme commenced during October 1998.</p> <p>The only flood warden scheme within the Derbyshire Derwent LEAP area is for Bakewell.</p> <p><u>25</u> – There may be some scope for combining the use of traffic flow and meteorology in addition to direct measurements in accessing air quality. The Agency has already investigated projects to examine the possible use of meteorological data to predict pollution incidents.</p>

Consultee	Comments	Issue Number/Response
Derbyshire Historic Buildings Trust (Dr Patrick Strange)	<p>Trust's principle concern is for the historic built environment; particularly the remains of former water powered industry along the Derwent.</p> <p>Possibility of World Heritage Status for the Middle and Lower Derwent Valley within the next two years.</p> <p>Concern that a fuller appraisal of the structures associated with the development and use of waterpower has not been included. In particular, there are weirs at Matlock Bath (Masson Mill), Belper (Strutt's Mill) and Darley Abbey (Darley Abby Mill) which are associated with sites of international importance. It is not possible to separate out these major industrial monuments from the water power structure, which form an integral part of them. It is felt that any appraisal of the Heritage aspect of the Derwent should include all such structures, that they should be identified, their historical importance assessed, conditions examined and any necessary remedial work prioritised. Offer to help implement these proposals.</p>	<p>The idea of a World Heritage Site has been spoken of for years, but at the time of this report nothing had yet happened.</p> <p>Calver Weir is mentioned in the LEAP because it was identified to the Agency as an issue. The Agency was not made aware of any problems at the others.</p> <p>Offer noted.</p>
Derbyshire Joint Anglers Council (G Clevely, Hon. Secretary)	<p>LEAP welcomed – look forward to great improvement of water quality.</p> <p>Find it hard to understand that no coarse fishery club or association was contacted to formulate the plan.</p>	<p>Thanks for the support.</p> <p>We apologise for the oversight. All angling clubs should have been on the consultee list. The report was issued for consultation and you are welcome to make any constructive comments. They will be incorporated wherever possible.</p>
Derbyshire Wildlife Trust (Mr Pete Longbottom, Conservation Officer)	<p>Generally support the vision.</p> <p>17 of the 'Trusts' 43 nature reserves lie within the plan area and may be affected by the issues and actions within the plan.</p> <p><b>Additional issue</b> – detrimental impacts of abstractions and discharges on the quality and quantity of the Via Gellia stream – relating to quarrying in the area.</p> <p>In the early 90's the summer flows become very restricted – at times the stream virtually dries up. When flows were restored they contained significant silt loads and potential pollutants from discharges. This has resulted in changes of flora and fauna sections of the stream and has caused problems for the ponds in Cromford and possibly the feed into Cromford Canal. The Via Gellia Woods through which the stream flows is an SSSI and part of a proposed SAC. Detrimental impacts associated with these consents are a priority matter we would like to see this LEAP address.</p>	<p>Noted.</p> <p>The Via Gellia has always tended to be seasonal. The drought period of the early 1990's may have made this more obvious but we have had no evidence of its impact on the flora and fauna in the vicinity. Consent conditions are aimed to ensure that no detrimental impact occurs.</p>

Consultee	Comments	Issue Number/Response
Derbyshire Wildlife Trust (Mr Pete Loughbottom, Conservation Officer)	<p><u>Issue 5</u> – share the Agency’s concern over the quality of the Alfreton Brook and the Lower Amber. Welcome plans to improve chemical and biological quality.</p> <p>Plans to reduce impediments to the colonisation of salmonids are welcomed. However, if the environment is made more appropriate, restocking should be achieved by natural colonisation.</p> <p><u>Issue 6</u> – support Agency in concerns but is worried about the reliance on water releases to compensate for abstractions. Implications of proposal needs to be investigated further.</p> <p><u>Issue 7</u> – support the need to address this issue. Concerned that a more holistic approach to discharges of sewage effluents in the carboniferous limestone area has not been taken. Many of the valleys in this area contain SSSIs, NNR and SAC with associated watercourses. Several of these are Trust reserves.</p> <p>Protection of the aquifer must not be achieved by increasing the loadings on the surface hydrology, which are already unacceptably high (i.e. effects of Buxton STW on Cheedale Reserve within Wyedale SSSI and Derbyshire Dales SAC). Feel that this issue should be broadened to deal with impacts on both surface and underground systems.</p> <p><u>Issue 8</u> – support Agency in highlighting the problem but would like to see reference to a need to seek controls if necessary by legislation.</p> <p><u>Issue 11</u> – support for issue – clearly has implications for the environment that can go beyond traditional manuring.</p> <p><u>Issue 12</u> – the Trust has suffered from fly-tipping on a number of its reserves and welcomes the Agency’s approach. However, a significant part of fly-tipping is organic material – action point on working with LAs and others in encouraging composting schemes.</p> <p><u>Issue 13</u> – <i>Crassula helmsii</i> presently has a limited foothold in the area. Present in Wyver Lane Reserve. Include in issue. The Trust is concerned about increasing numbers of such plants and animals – should either be included in the existing legal framework or new statutory controls and reference to this included here.</p> <p><u>Issue 14</u> – support Agency in concerns about this issue. However, other method alluded to can be equally destructive of the habitat if inappropriately applied. Drawbacks need to be included to provide a proper balance.</p> <p><u>Issue 15</u> – should be promotion of the <u>sustainable</u> recreational access to include an inherent requirement for environmental compatibility.</p> <p>Action omitted: to develop a strategy.</p>	<p><u>5</u> – noted.</p> <p>Noted.</p> <p><u>6</u> – The reservoirs were built to release water for abstraction when needed and we are in discussion with STW.</p> <p><u>7</u> – Support noted. In order to provide a holistic approach to this particular problem the Agency has developed a Carboniferous Limestone Policy which we are seeking to have accepted as National Policy in order to get consistency throughout the Agency (England and Wales). This is supplementary to our existing statutory responsibilities in respect of other controlled waters.</p> <p><u>8</u> – support noted.</p> <p><u>11</u> – support noted</p> <p><u>12</u> – There is some networking between different operators interested in composting activities.</p> <p><u>13</u> – We are extremely concerned about the lack of control that exists over the trade of non-native and potentially highly invasive plant species. However, as observed, this requires changes in the legal framework and is consequently a national issue. We will look at including an action in the annual review.</p> <p><u>14</u> – support noted. See reworded issue in Action Plan.</p> <p><u>15</u> – Comments noted.</p> <p>All recreational initiatives are considered in terms of ecological impact and appropriate mitigation measures set in place.</p>

Consultee	Comments	Issue Number/Response
	<p><u>Issue 18</u> – welcome the inclusion of this issue and support detailed elements in general.</p> <p>Introduction of BAPs in Derbyshire – the Trust did produce the Mid-Derbyshire BAP but on behalf of a partnership of local organisations. The National Forest and Peak District Plans are being produced by the National Forest company and the Peak Park Board respectively, not the Trust, but the National Forest is not in this area.</p> <p><u>Water voles</u> – 1997 surveys showed that vole distribution included far more than main rivers – all watercourses need to be covered, including some at quite high altitudes. Some watercourses will require habitat enhancement for population expansion.</p> <p>Problems with interaction with mink – action on a monitoring and control strategy.</p> <p><u>Bats</u> – benefits of improving the riparian corridor and appropriate management of trees and woodland in the floodplain (including the potential impact of the phytophera).</p>	<p><u>18</u> – support noted.</p> <p>Error noted. We think that one tip of the National Forest does just reach into the plan area.</p> <p><u>Water vole</u> – we look at main river only – presumably the BAP targets cover the other watercourses.</p> <p>There are many factors relating to the decline in water vole numbers. Water quality and habitat loss remain the main factors – it was not considered that mink were the sole factor, hence no reference was made to them. There have been no surveys of mink in the area, so it would have been anecdotal that they are solely to blame. The Agency publishes a leaflet on mink control, which may be of use to riparian owners.</p> <p><u>Bats</u> – it is part of Agency day to day work to enhance riverside habitats.</p>
<p>Derbyshire Wildlife Trust (Mr Pete Longbottom, Conservation Officer). Cont.</p>	<p><u>Crayfish</u> – database on both the native and signal crayfish populations need to be improved. Agency to lead? Agency's influence with angling interests could be used to educate them about problems caused by signal crayfish. Agreed code of practice or legislation to ban practices such as using them as bait?</p> <p><u>Birds</u> – need for more research and data collection to enable informed management strategies. Relationship between fisheries and birds – more than advisory work needed.</p> <p><u>Woodlands</u> – National Forest is not in this area.</p> <p><u>Issue 23</u> – reference to investigation of opportunities to increase and enhance washlands as part of the solutions to flooding in both the named locations.</p> <p><u>Issue 24 – 24.3</u> is clearly unacceptable (do nothing). Would like this and previous issues explore if existing development is suitable in the floodplain.</p>	<p><u>Crayfish</u> – this is one of the species that the Agency has been identified as being a "contact point" for. As such we have a key role in promoting the implementation of practicable actions needed to conserve the species. The national database is in the process of being updated. More information can be found in the Agency booklet "Freshwater Crayfish in Britain and Ireland".</p> <p><u>Birds</u> – The Agency was unaware that there were waters with cormorants in the m in the plan area. We only found out about the Goosanders when we were approached by the FRCA (after the plan was written). Refer to R&amp;D???</p> <p><u>Woodlands</u> – the tip is.</p> <p><u>23</u> – the floodplain would need to be increased considerably in order to achieve any significant lowering of flood levels and this is considered to be impractical.</p> <p><u>24</u> – the "do nothing" option was added to indicate the alternative to action. There is no current legislation enabling the Agency to compulsorily remove existing properties located in a floodplain.</p>
<p>Derwent Valley Trust (Mr Graham Knight)</p>	<p>Welcome publication of the LEAP.</p> <p><u>Issue 15</u> – scope for partnership and involvement linked with public transport, visitor management, education and information</p> <p>Current work includes a joint study of access along the full length of the river, the route to be known as Heritage Way.</p>	<p>Thanks.</p> <p><u>15</u> – Public transport is outside the control of the Agency, but perhaps we could realise some of our aims in relation to recreational access.</p> <p>Noted.</p>

Consultee	Comments	Issue Number/Response
Derwent Valley Trust (Mr Graham Knight) (Contact)	The Agency is invited to identify projects suitable for Landfill Tax Funding and in respect of which the Trust could act as a catalyst in taking the projects further.	No projects identified yet.
Derwent Fly Fishing Club (Mr Stephen Baker, Chairman, River Sub Committee)	Surprised that the LEAP makes no mention of predator birds and their effect on the wild fish stock on the upper reaches of the Derwent. Increasing presence of Goosander and Mersander on the stretch of river used by the Derwent Fly Fishing Club (Yorkshire Bridge to Grindleford Bridge). This has been coupled with a decline in small natural stocks of brown trout and grayling. Sightings reported and tabled – estimated ten breeding pairs. Agency has confirmed low numbers of small fish through electric fishing surveys.	The Agency was unaware that there were waters with cormorants in the m in the plan area. We only found out about the Goosanders when we were approached by the FRCA (after the plan was written).
Mr A S Dewick, South Derbyshire	Questionnaire received Concern that no mention is made of possible effects of airborne pollution emanating from civil aircraft. Other reports acknowledged. Has the expansion of industrial development in the south of the City of Derby been equated within the terms of sustainable development and a balance between industries needs and the protection of the local community achieved? Use of SRB/3 budget?  Give more emphasis to tree stock in the country generally and importance of work of agencies in area of tree protection and expansion of Tree Warden projects, TPOs and National Forest Development? <u>Appendix 2</u> – add Derbyshire Association of Local Councils to this appendix?	Air pollution from aircraft is the remit of the Local Authorities.  This will be dealt with by Local Authority Plans or perhaps the Local Agenda 21 process for the city of Derby.  SRB/3 – Single Regeneration Budget. This is government money for industrial regeneration – and is dealt with by Local Authorities. Tree stock will be taken on board by the Derbyshire BAP, to be prepared by Derbyshire County Council and Derbyshire Wildlife Trust, to which the Agency has contributed. TPOs are the responsibility of Local Authorities. <u>Appendix 2</u> – is purely a list of those organisations that made a response to the initial list of draft issues, which was sent out at the start of the process in July 1997. It is by no means an exhaustive list of all those organisations consulted through the process so far. The Consultation Report will not be written as part of the LEAP process. The Action Plan was published in January 1999 and will be monitored and reviewed annually.
East Midlands Rowing Council (Mr Nigel Maygoulding, Chair)	Questionnaire received. Omissions include rowing in Derby. The Derby Rowing Club and the Derwent Rowing Club (including Derwent University) are both active clubs. Good presentation at the launch.	Rowing was omitted in error from the plan, but there do not appear to be any issues arising from this. The Agency has worked closely with the two clubs in the past. Thanks.
Elvaston Parish Council (Mrs P Garratt)	Questionnaire received. Broadly agree with the vision for the area. Support for the LEAP in principle. <u>Waste disposal</u> – why should Derbyshire be such a great importer of waste?	General support noted.  <u>Waste disposal</u> – because there are a lot of voids and two large waste treatment facilities in Derbyshire (neither in the plan area).

Consultee	Comments	Issue Number/Response
<p>Elvaston Parish Council (Mrs P Garatt) (cont'd)</p>	<p><u>Water quality</u> – Lower Derwent – only just at the required quality with no margin to cope with occasional excesses of poor quality water reaching the river.</p> <p><u>Flood warnings</u> – Ambaston – a valve in the floodbank needs to be capable of being closed from inside the floodbank. Severn Trent insists that only they are permitted to close the valve in times of flood – if they can get to Ambaston through the floods.</p> <p><u>Heritage and Wildlife</u> – inadequate consideration given to the area between Borrowash and the confluence with the Trent.</p> <p><u>Issue 3</u> – as one of the PCs to be most affected by the bad water quality caused by wrong sewerage connections, request for more details.</p> <p><u>Issue 4</u> – mention of stricter limits on industry, closer monitoring and action for non-compliance.</p> <p><u>Issues 8, 9 &amp; 12</u> – strong support for the Agency on these issues</p> <p><u>Issue 16</u> – support for the issue but the Agency is urged to undertake the archaeological survey now and make it part of the Agency's response to the County Minerals Plan presently under re-consideration.</p> <p><u>Issue 20</u> – no mention made of domestic water meters curtailing waste.</p> <p><u>Issue 24</u> – should have been made a site-specific issue relating to gravel extraction and the effects of leaving old workings in water.</p> <p><u>P53</u> – Importance of floodplains – statement related to development in third paragraph. Welcomed, but such development has already been permitted on Boulton Moor. Will the final LEAP contain some protection against further development?</p>	<p>This problem is being addressed by the sewage and sewerage improvements, costing £80 million in Derby City and Derby SW( see Issue 4)</p> <p><u>Flood warnings</u> – we believe this query refers to the penstock at the point where the floodbank crosses Harrington Drain. The penstock exists as an emergency back up for the flap valve on the outlet for the culvert and will be closed by Agency operatives in the event of a prolonged flood or failure of the flap valve. If the penstock is closed, then there is no route for the Harrington Drain to discharge and pumping has to be arrange to avoid flooding due to trapped water.</p> <p><u>Heritage and Wildlife</u> – this is probably true, but page 112 does mention the archaeological interest in the Lower Derwent.</p> <p><u>3</u> – the current situation is that Chaddesden Brook at Meadow Lane is the highest priority due to the large number of wrong connections associated with the plan area. There have been intermittent problems associated with the Bramble Brook but these have now been resolved. The nature of this problem means that it is not possible to identify any specific sites or the extent of any subsequent surveys. The impact of wrong connections varies with rainfall and the location of outfall. The Agency will continue to work in partnership with both Severn Trent Water Ltd and the Environmental Health Department of Derby City Council in the investigation and remediation of this extensive problem.</p> <p><u>4</u> – noted.</p> <p><u>8, 9 &amp; 12</u> – support noted.</p> <p><u>16</u> – support noted. The Local Minerals Planning Authority will ensure that archaeological survey is carried out as part of the permission it gives. The Agency may assist but the Local Authority must lead on it.</p> <p><u>20</u> – the constraints column of the issue table states that "domestic charging offers no incentive". Universal metering of domestic water may reduce demand but has far reaching implications.</p> <p><u>24</u> – this issue identifies the need to complete the floodplain mapping for the rivers Derwent and Wye. These maps will be used to effectively control development on floodplains.</p> <p><u>P53</u> – Thulston Brook, in the Boulton Moor area has recently been improved in order to have sufficient capacity to receive additional surface water for new development. The Agency has submitted an application to MAFF to redesignate the improved length of the brook as 'Main River'.</p>



Consultee	Comments	Issue Number/Response
Elvaston Parish Council (Mrs P Garratt) (cont'd)	<p><u>P83</u> – Local perspective – request for a copy of the Asset Survey, as related to Ambaston flood defences.</p>	<p><u>P83</u> – Flood Defence has commented to Elvaston PC on the condition and level of the Ambaston flood defences. It is not considered that a copy of the Asset Survey is necessary.</p>
English Nature, Peak District & Derbyshire Team (Ms Claire Trinder, Conservation Officer)	<p>Response draws together all comments made by team. LEAP and positive approach taken by Agency over major issues identified is welcomed. No significant issues omitted. Support offered in taking the LEAP forward. Key objectives – <u>abstractors</u> to be limited to a sustainable amount of water, rather than the Agency ensuring sufficient water is available.</p> <p><u>Water quality</u> – in the Lower Derwent should not simply be sustainable, but of a high quality. <u>Biodiversity</u> – disappointing to see it so far down the list.</p> <p><u>Map 3</u> – South Yorkshire County Council no longer exists. Derbyshire County Council should no longer include Derby City – which is now a unitary authority. <u>Map 5a</u> – limestone boundary marked wrongly – should extend further north to Castleton. Error repeated on several other maps within the plan</p> <p><u>Issue 2</u> – effects of mine workings on flows is not as definite as the text suggests. River is now being surveyed for crayfish – none found. <u>Issue 7</u> – Agency's concern is shared about discharge of sewage effluent directly to the limestone, especially where knowledge of the hydrology is incomplete. Particular concern about potential impacts on water quality and contamination of internationally important cave systems found within the White Peak <u>Issue 8</u> – Agency concern shared. <u>Issue 13</u> – Himalayan balsam is not listed on schedule 9 of the Wildlife and Countryside Act. It is an offence to plant or cause Giant hogweed or Japanese knotweed to grow in the wild, rather than simply "allowing" them to grow. <u>Issue 14</u> – bracken can have considerable value for ground nesting birds <u>Issue 15</u> – welcome Agency commitment to ensure any proposed new access routes do not affect sensitive habitats or species. <u>Issue 18</u> – National Forest BAP has been produced. Mammals – number of recent sightings and signs of otter in the Derwent near Haddon Hall, suggesting that they are re-establishing in this area.</p>	<p>Noted Support noted and welcomed.</p> <p>The Agency does not guarantee that water will be available for abstraction and we would certainly not grant new or increased licences unless that we considered the quantities to be sustainable. Unfortunately there are existing situations where Licences of Right authorise abstraction in excess of resource availability in times of low flow. See Issue 4. The problem is a complex one, not simply solved by making the water "high quality". As stated at the top of page 22. "there is no priority order to the sections or the issues within each section". They have been subdivided for convenience only. Error noted.</p> <p>Error noted.</p> <p>2- comments noted.</p> <p>Noted. Concern noted. As mentioned earlier, in order to provide a holistic approach to this particular problem the Agency has developed a Carboniferous Limestone Policy, which we are seeking to have accepted as National Policy.</p> <p>8 - Noted. 13 – We did not say that Himalayan balsam is listed under the Act, but we did say "cause to grow" which is the text in the Act.</p> <p>14 – Noted. See reworded issue in Action Plan. 15 – support noted.</p> <p>18 – noted. Noted.</p>

Consultee	Comments	Issue Number/Response
English Nature, Peak District & Derbyshire Team (Ms Claire Trinder, Conservation Officer). Cont.	<p>Survey of crayfish in White Peak rivers – no native or non-native species were found.</p> <p>Derbyshire Feather Moss – location not to be mentioned in action Plan.</p> <p>EN has no active role at the moment in the return of otters to the catchment.</p> <p>Feasibility of reintroducing crayfish to appropriate rivers, such as the Lathkill.</p> <p>Support the creation of new wetlands.</p> <p>Surprised to see that the restoration of heathland has no cost implications.</p> <p>EN expect some involvement with the Agency when consents potentially affecting SAC woodlands are reviewed.</p> <p>Support for Agency proposal to investigate restorations of wet woodland in the flood plains.</p> <p><u>Issue 20</u> – support for Agency proposal to reduce domestic waste and industrial wastewater.</p> <p><u>Map 15</u> – River Wye shown as a river SSSI, Lathkill not. Several SSSIs missing. Boundaries would be clearer than dots – SPAs and SACs could also be shown.</p>	<p>Noted.</p> <p>The Agency has no intention of revealing the location. Hopefully in the future?</p> <p>See Action 18.9.1.</p> <p>Support noted.</p> <p>No cost to the Agency and it is impossible for us to estimate the cost to landowners.</p> <p>Noted.</p> <p>Support noted.</p> <p><u>20</u> - Support noted.</p> <p>Error noted.</p>
English Nature, East Midlands Team (Mr Ian Evans)	<p>Questionnaire received.</p> <p>No comments made.</p>	
FRCA (Mr A J Bowness)	<p>Response channelled via MAFF formal response. No comments made.</p> <p>Information provided re FRCA's role for Protection through Partnership section.</p>	<p>Noted.</p> <p>Information noted for future reference.</p>
Ms Sheila Finnis, Littleover	<p>Questionnaire received.</p> <p>Omission: section 2.3.3 Recreation – no mention of two very active rowing clubs on Darley Abbey Park area.</p> <p>This section of the river suffers when water levels rise and fall. Changes to water levels carried out several years ago have caused problems of bank erosion, trees falling along riverbank – quite severe problems being experienced. Similarly, bank erosion caused by flooding of river.</p>	<p>Noted – we did omit to mention rowing on the river.</p> <p>The riparian landowners are responsible for maintaining the beds and banks of the river (including trees and shrubs growing on the banks) and for clearing any debris. There is an agency booklet entitled "Living on the Edge", which gives guidance on the rights and responsibilities of riverside owners.</p>
GOEM (Mr R Charlton, Planning Team 2)	No comments made.	
Govt. Office for Yorkshire and the Humber (Miss J Capstick)	No comments made.	
Haytop Country Park (Mr H George)	<p>Questionnaire received.</p> <p>Major emissions: land classification map does not provide sufficient information to make decisions on waste disposal/spreading/infiltration etc.</p>	<p>The maps in the LEAP are intended for general reference only. They are not of sufficient scale to allow decision making at a local scale. This is done using much more detailed maps and the local knowledge of appropriate Agency Officers.</p>

Consultee	Comments	Issue Number/Response
<p>Haytop Country Park (Mr H George). Cont.</p>	<p>Soils maps needed for this. Waste of public money in compiling all the plans mentioned on pages 59 and 60.</p> <p>The report addresses important issues related to conservation, pollution and demands on the water resources for the public and industry. Poor record in waste disposal of local authorities in area. Those engaged in managing landfill sites have no vision about how waste should be recycled or burnt. All the money saved on cutting down on the number of plans on page 59-60 could have been invested in a modern waste burning power station and in proper waste recycling schemes. Recycling, in the view of most Derbyshire Waste Disposal Authorities means putting skips in supermarket car parks – a proper recycling scheme means collecting it from the household. Could procedure of spraying herbicides from helicopters not be banned? The alternatives are labour intensive and possibly more expensive but more environmentally satisfactory. Alien Invasive species – expensive to combat and monetary assistance would be appreciated from the central Government or EU.</p> <p>Recently there have been some sudden and severe fluctuations in the level of our stretch of the river Derwent. Over-pumping or letting of some water at Ambergate? We rely on a reasonable level of water as well as good quality water. Rail tracks – use as cycle-ways. Railways to be reopened to carry tourist and carry aggregates to get traffic off the roads and reduce air pollution. Cycle paths and footpaths can run alongside (land will have to be purchased for the purpose).</p>	<p>At the time of this report the Agency had no data for soil maps. The planning system, of which these plans are all a part, is a vital means of ensuring that the whole environment (both built and natural) is protected from inappropriate development. The plans complement rather than overlap each other. They are produced by Local Authorities (LAs) and the Agency is only a statutory consultee.</p> <p>These comments should really be directed at the LAs, whose responsibility this is.</p> <p>Only the Government could make such a decision.</p> <p>This is the responsibility of LAs.</p> <p>Perhaps you could ask MAFF to do so, referring to the ESA in the area.</p> <p>If owners deal with alien invasive plant species before they take a hold, then it would not be so expensive. The key is education and awareness of the problem. Other than the work on Giant Hogweed on the River Wye, the agency will not be tackling alien species elsewhere, unless there is a risk to a SSSI or similar. There have been isolated patches, which have affected river levels in this area. It should be emphasised that they have been isolated and unforeseen.</p> <p>The Agency aims to deliver a continual improvement in overall water quality. An interesting idea – but not one the Agency can act on.</p>
<p>Ms Joan Himpley, Dulfield</p>	<p>Suggestions re the future of the Derwent: We overlook a bend in the river at Dulfield. The great difference we notice is how large the overhanging branches have been allowed to come on stretch so popular with fishermen in the old days. The River Board used to go down the river on a barge every four years and cut down all the large branches – if not done again, the beauty of the river will be lost and hidden forever.</p>	<p>Overhanging trees offer shade and a food source to fish. Fishermen therefore prefer tree boughs to overhang rather than being cut back. The Agency Flood Defence section undertakes cutting back only when it becomes a threat of falling in and causing a blockage. It is a riparian owner's problem, but we feel that the benefits outweigh the points made.</p>

Consultee	Comments	Issue Number/Response
Hydro ACTIVE (Mr Andy Bond)	<p>Interested in what the Agency has to say on plans for recreation other than fishing, which seems to be everyone's idea of the only water activity available.</p> <p>Pleased to see the mention of Matlock Canoe Club. But not enough is being done along the Derwent Valley for canoeing and other recreation, particularly the Darley Abbey area (lend itself ideally to water sports but needs some more development).</p> <p>Would like the opportunity to get involved in the planning stages and ensure that other water based recreation gets it's say. Please take note – there are also canoeing activities along the River Derwent to take into consideration.</p>	<p>The Agency is assisting Matlock Canoe Club as the original canoe slalom was put in as a part of a flood alleviation scheme in the 1970's. We will also be required to consent the proposed works. The River Derwent is in private ownership and the Agency can only assist in advising landowners what may be suitable on their land. We do work in partnership with local authorities, landowners, Countryside Commission and so on, to promote recreational use. Most of the River Derwent is fished and thought must be given to not spoiling one sport by the introduction of another. It is suggested that initial talks be held with Derby City Council planners to assess whether any Local Plan policies relate to recreational provision.</p>
The ICE (Mr Roger Dobson, Director General & Secretary)	<p>Referred to East Midlands Local Association for information and comment. No comments to make.</p>	
The ICE, East Midlands Association, Notts and Derby Branch (Mr D L Hollingsworth)	<p><u>Issue 1</u> – the main obstacle to enabling works on Calver Weir is finance. This may be assisted by consideration of the health and safety implications of collapse of the weir, providing the works with greater urgency.</p> <p><u>Issue 3</u> – the investment required to undertake a detailed survey is prohibitive. Education and awareness training is likely to have best results, along side long term action by sewerage undertaker and local authority within their ongoing maintenance regimes.</p> <p><u>Issue 4</u> – Severn Trent Water Ltd are currently understood to be undertaking a programme of works in the Derby Central area and SSWS which will go some way to eliminating dry weather and premature discharges to the Derwent. Consideration may be given to impact on quality of surface runoff resulting from gully maintenance scheme.</p> <p><u>Issue 7</u> – a more general problem contributes to this issue. The planning approach in sewerage investment is such that structural triggers are given a much lower priority than hydraulic ones. Therefore, many pipes in a condition, which would enable leakage, are overlooked in scheme planning. This may contribute a significant level of pollution to the carboniferous limestone.</p>	<p><u>1</u> – it is not clear to the Agency exactly how a consideration of the H&amp;S aspects will bring forward the much needed finance to repair the weir. It is not the Agency's responsibility and the owner has put the weir into private company hands with no finance backing.</p> <p><u>2</u> – wrong connections can be attributable to single washing machines from domestic dwellings to wholesale building errors on drainage runs. The accumulative effect of a number of domestic properties wrongly connected can have a significant impact on the receiving watercourse (both in water quality terms and public health implications). There is no alternative to surveys on the drainage areas in order to address the current problems. Large areas of Derby are involved and the surveys are time consuming and the remediation can be costly and extensive. However, the Agency in close liaison with Severn Trent Water Ltd and Derby City Council is confident that through education and raising the public profile of wrong connections, this issue can be successfully addressed.</p> <p><u>4</u> – gully cleaning can cause problems, particularly on small watercourses into which the gullies drain. Generally the problem is associated to the design of the vehicle. Some designs use clean water and others recharge the gully with contaminated waters after filtration. The waters from gully cleaning can be highly polluting, but their effect on the River Derwent has not been considered significant against the other numerous impacts.</p> <p><u>7</u> – the structural state of the sewers is not the issue. We are more concerned with locations on the sewer that we designed to discharge to the Carboniferous Limestone in periods of heavy rainfall.</p>

Consultee	Comments	Issue Number/Response
<p>The ICE, East Midlands Association, Notts and Derby Branch (Mr D L Hollingsworth) (cont'd)</p>	<p><u>Issue 19</u> – consideration should be given to how this can be extended to encompass commercial and domestic wastes.</p> <p><u>Issue 20</u> – education and media involvement to promote efficient usage would achieve best result is water was a metered commodity. Therefore, consideration should be given to promoting water meters.</p> <p><u>Issue 23</u> – in view of recent flooding problems it may be necessary to reconsider the cost/benefit ratio required to trigger action.</p> <p><u>Issue 24</u> – this issue is of utmost urgency in view of recent events and the prospect of substantial future housing development proposed by the Government.</p> <p><u>S 4.3.2</u> – Transport – require raised public awareness of issues – use of tourist information facilities?</p> <p><u>S 4.3.2</u> – Flood defence – softer solutions to drainage problems do not present engineering difficulties. Cost implication of adoption of systems by LAs etc. are exacerbated by inequality in design criteria encouraging use of piped solutions.</p> <p><u>S 4.4</u> – Education – recognised as the most important aspect for long term strategies and has often achieved the best results to date.</p>	<p><u>19</u> – This is done by the Agency in our day to day work. As such it has not been included as an issue in this LEAP.</p> <p><u>20</u> – the constraints column of this option state that “domestic charging systems offer no incentive”. Universal metering of domestic water use may well reduce demand, but has far-reaching implications.</p> <p><u>23</u> – benefit/cost studies are carried out in connection with all proposed flood defence schemes. The decision whether or not to proceed is dependant upon the cost/benefit ratio of the works.</p> <p><u>24</u> – we agree!</p> <p>Noted.</p> <p>Comments noted.</p> <p>Agreed!</p>
<p>Inland Waterways Association (Mr Neil Edwards, Director)</p>	<p>Majority of the plan found to be acceptable. Comments made with a constructive mind and a willingness to enter into further dialogue and research should this found to be helpful.</p> <p><u>Issue 13</u> – proposals welcomed. Giant Hogweed can be hazard to recreational users of sites where it has taken hold.</p> <p><u>Issue 15</u> – development of a strategy welcomed. Hope that equal importance is given to less formal forms of recreation such as walking beside waterways.</p> <p>Continuation of support for initiatives such as Derwent Valley Heritage Trust welcomed.</p> <p>No mention of Cromford Canal in this section. Agency involvement? Opportunity to develop and enhance tourism, recreation and conservation value of this section of the canal further. Derby and Sandiacre Canal restoration – provision of resource unlike those already present.</p> <p><u>Issue 16</u> – no mention of the presence of the Derby Canal and the Cromford Canal in this context – both heritage sites in the area.</p>	<p>Comments noted.</p> <p>Thanks.</p> <p>Noted.</p> <p>Support noted, thanks.</p> <p>Noted.</p> <p><u>16</u> – noted. The Derby Canal was mentioned in the overview text.</p>

Consultee	Comments	Issue Number/Response
Inland Waterways Association (Mr Neil Edwards, Director) (cont'd)	<p><u>Map 14</u> – site of the Draycott groundwater abstraction by Severn Trent Plc missing.</p> <p>Low levels in river observed by anglers on the lowest reach of the River Derwent suggest increased extraction at Little Eaton and Draycott. The newly approved abstractions for STW Ltd from gravel pits in the Shardlow area will only exacerbate the problem. Additional figure suggested to show whether the reduced flows over Sawley Weir on the River Trent are due to reduced flows in the Derwent or in the Trent.</p> <p><u>S 5.13</u> – no mention of the individual monuments of the industrial revolution i.e. the stream engine and pump at Lea Wood on the Cromford Canal.</p> <p><u>S 6.4.2.</u> – Cromford Canal not now used for navigation other than by small craft.</p> <p>Derby and Sandiacre Canal Company not the Derby and Sandiacre Canal Trust.</p>	<p><u>Map 14</u> – there is no groundwater abstraction at Draycott at Derby.</p> <p>There has been no increase in abstraction of surface water authorised. The license has been waved to give more flexibility in operation. Gravel pits only used for water abstracted from river. The quantities are linked to the Little Eaton and Draycott licences.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted – thanks.</p>
Mr Alan Jeffreys, Breaston, Derby	<p>Questionnaire received.</p> <p>Errors or omissions: would have thought that proposals to restore the former Derby Canal would feature.</p>	<p>The Derby Canal was mentioned in the overview text.</p>
Lafarge Recland Aggregates Ltd (Mr D R Wandrop, Divisional Geologist)	<p>No site specific issues arising. Remain concerned about the generally negative language used in relation to mineral working as in S 5. Some regions have used slightly more neutral language. Seek a balanced view, which will not create unnecessarily negative perceptions of the mining and quarrying industry in the minds of the public.</p>	<p>Concerns are noted and we acknowledge that we could have used slightly more neutral language. We will endeavour to present a more balanced picture in future LEAPs.</p>
Laporte Minerals (Mr K J Parkhouse)	<p>Questionnaire received.</p> <p>No comments made.</p>	-
MAFF, Rural and Marine Environment Division (Mr R J Warlow)	<p>No mention of WLMPs.</p> <p>Part of area lies within the North Peak ESA.</p>	<p>There are no WLMPs intended for the Derbyshire Derwent plan area.</p> <p>Omission noted</p>
Mr D Mallon, Warsop	<p>Questionnaire received.</p> <p><u>Issue 18</u> – Water voles – much more common in the plan area than previously thought, from head streams on high moors (over 400m) and main rivers. Derbyshire population therefore significant nationally. Add water voles to issue 6 (water levels in the Ashop and Noe), where they have become extinct. Separate comments on issue 18 sent via DWT.</p> <p>Bats – this subsection seems rather weak, probably reflecting the paucity of knowledge. Option for action suggested: survey main rivers for Daubenton's Bat (bridge survey done by members of Derbyshire Bat Group on contract?)</p> <p>Excellent document!</p>	<p>Information noted.</p> <p>The return of water should encourage colonisation by water voles. The annual review will cross reference with Issue 18.</p> <p>Noted. The Agency simply cannot do all the surveying which would be expected if we added such an option.</p>

Consultee	Comments	Issue Number/Response
Cllr. J March, Matlock	Support general tenor of the consultation document. Feel that there is a significant omission in that little or no mention is made of the physical structures and particularly the buildings that are an important aspect of the environment of the River Derwent, and hence its conservation.	Although the Agency has to take regard of buildings and landscape in our work, there is actually very little that we can do that impacts upon buildings. As they are protected by the LA in Local Plans and through both the LA and English Heritage, we don't feel it would be addressed through the LEAP unless there was a burning issue to be dealt with (which there is not, apart from Calver Weir). We can go no further than to mention the many mills and refer to LA documents, which would protect them.
Matlock Civil Association (K J Parker, Secretary)	Questionnaire received. "Vision for Matlock" relates strongly to the topics covered in the LEAP. Riverside to be enhanced as focal point of town – opportunities for new development facing the river. Footpath along south side of the river. Creation of riverside footpath / cycleway – between the Cromford Canal and Darley Bridge. Some footpaths exist but notable gaps. Creation of new lake in Hall Leys Park – interested in a technical appraisal of the idea – by the Agency?	Noted. Noted. Noted. Any new proposals such as this idea should be discussed with the Agency and we will give favourable consideration if at all possible. A new fixed weir would raise upstream flood levels in Matlock and thereby reverse the benefits achieved by the flood alleviation works carried out. Automatic sluice gates across the river could possibly be designed to retain a raised upstream water level during periods of normal flows. These could then be opened when higher flood flows occur. However, the cost of such an arrangement would be high and may not be acceptable visually. The Agency has no plans for constructing either a fixed weir or automatic sluice gates at this location.
Midland Canoe Club (Mr S Pilbeam)	Plan welcomed and especially support the key issues of improved water quality and recreational access. As a club we would like to see the following; 1 - improved access to all sections of the River Derwent to canoeists. There is presently virtually none apart from a small section at Matlock Bath and Derby. 2 - improved access (and launching points) to Agency sites including weirs and white water sites. 3 – consideration and consultation with canoeing organisations when altering parts of the river and flow. 4 – improved launching facilities at the clubhouse site at Darley Abbey.	Noted – thanks. 1 – if we are approached to assist in access agreements we will do so. This is day to day work of the Agency and would not necessarily be highlighted in the LEAP. We will happily work with you if required, but the British Canoe Union and riparian owners would take the lead in this. 2 – the Agency does not own anything that could be used as a launching site (we have land at Darley Abbey and Whatstandwell). 3 – during the design of river improvement works the Agency's Fisheries, Ecology and Recreation staff are fully consulted regarding the impacts of the works. 4 – is the club going to submit a proposal to the Agency for improved launching facilities at this site?
Moorway AC (Mr K Reader)	Questionnaire received. No comments made.	
Motimer Wilson School Env. Science Dept. (Mr M Gander, Co-ordinator of Humanities)	Questionnaire received. The report forms an excellent resource for both teaching and for students to use in their individual assignments.	Thanks.

Consultee	Comments	Issue Number/Response
<p>NFU, West Midlands Region (Mr A Richards, Sr. Technical Adviser)</p>	<p><u>Issue 1</u> – NFU recognises that there is an urgent need for works to prevent the weir from collapsing. Option 1.1 fully supported. Option 1.5 not considered realistic.</p> <p><u>Issue 2</u> – NFU believes that urgent work is necessary to investigate the position. Option 2.1. fully supported.</p> <p><u>Issue 6</u> – need to investigate and take action to improve the flow of conditions within the rivers.</p> <p><u>Issue 7</u> – full support for measures to limit the discharge of sewage effluents directly to the carboniferous limestone.</p> <p><u>Issue 8</u> – increased toxicity of synthetic pyrethroid dips recognised. But they are an alternative to the organo-phosphorous dips and as such, their continued use is important to sheep producers. Dipping is essential to control scab. Measures proposed in this issue are fully supported. In particular there is a need to publicise the environmental risks and for agencies to undertake an advisory role on the appropriate means of disposal of the spent sheep dip.</p> <p><u>Issue 11</u> – concerns noted, but we do not believe that the actual risk from pollution from waste spreading activities is as extensive as suggested. We suggest that land occupiers must have the option to apply appropriate material if this is beneficial to their land</p> <p><u>Issue 12</u> – any measure that would reduce the incidence of fly-tipping is supported. Also, measures should be adopted to improve any chance of identifying fly tippers and subsequent prosecutions.</p> <p><u>Issue 13</u> – proposals supported.</p> <p><u>Issue 14</u> – the use of Asulox is the only practical means of controlling bracken in upland areas. Any reduction in the control methods available would be of particular significance both for the farming community and for nature conservation. We consider that the current restrictions, if properly applied, provide sufficient safeguard. NFU would fully support further R&amp;D work into alternative methods of bracken control.</p> <p><u>Issue 15</u> – concern that new access should be on a voluntary basis and should not impact upon agricultural activity or on sensitive wildlife habitats.</p> <p><u>Issue 23</u> – option 23.2 supported.</p> <p><u>Issue 25</u> – whilst noting the concerns expressed in this issue we believe that further investigation should be undertaken into the effect of the discharge of aviation fuel and other pollutants from aircraft over-flying the area whilst awaiting the arrival at Manchester airport.</p>	<p>1 – support noted and welcomed!</p> <p>Agreed. This option was included simply to indicate the alternative to action!</p> <p>2 – Agreed and support noted!</p> <p>6 – investigations and amelioration of low flows is exactly what the Agency intends to do!</p> <p>7 – support noted!</p> <p>8 – Support noted! We are making an effort to publicise the problem. TV coverage has included several news-clips on the East Midlands Today programme. An R&amp;D paper entitled "A Strategic Review of Sheep Dipping" has recently been issued (R&amp;D Technical Report p.170) by the Agency.</p> <p>11 – Issue has been reworded.</p> <p>12 – support noted – thanks!</p> <p>13 – support noted - thanks!</p> <p>14 – Support for further R&amp;D noted. A workshop entitled "The Environment Agency Bracken Control Workshop" was hosted by the Agency in November 1998 to discuss this issue. Presentations were followed by a series of workshops to discuss various aspects of the problem. The results of this workshop will feed into Action 14.2.</p> <p>15 – the Agency can only promote the use of land associated with water. However we will assist landowners and LAs where we can with the creation of new paths.</p> <p>23 – supported noted and welcomed.</p> <p>25 – the Agency has no remit in respect of air pollution from aircraft. Air quality is the responsibility of the LAs.</p>
<p>The National Trust, The High Peak Estate Office (Mr S Trotter, Property Manager)</p>	<p>LEAP welcomed. Huge amount of work it involved is appreciated. Would welcome opportunity to discuss further and would wish, where possible, to be a partner in the resulting Action Plan.</p>	<p>Thanks! Offer noted.</p>



Consultee	Comments	Issue Number/Response
<p>The National Trust, The High Peak Estate Office (Mr S Trotter, Property Manager) (cont'd)</p>	<p>Plan's objectives welcomed.</p> <p>Agency's role in making a contribution to sustainable development welcomed.</p> <p>Would like to be considered as future member of AEG.</p> <p>Concerned about possible impact of road schemes and highway run-off on Trust interests.</p> <p>The Trust welcomes any improvements which the Agency can secure in terms of atmospheric emissions (acidic deposition – significant impact on biodiversity and quality of moorland and blanket peat habitats of Dark Peak). High school atmospheric pollution levels in upper Derwent – effects on woodland and semi-natural habitats. Vehicular use and tourism are therefore an issue which requires action.</p> <p><u>Issue 2</u> – understanding of hydrogeology of limestone aquifer very important. Issue welcomed. Hope that consultation with landowners and interested bodies will occur (especially the Derbyshire Caving Association).</p> <p><u>Issue 6</u> – concern shared. We would wish to see increase in water flows throughout the year. Due regard ought to be given to the consequences of a reduction of shingle beds for common sandpipers (at least during the breeding season).</p> <p>Concern about effect of artificial stocking up on genetic integrity of wild fish populations.</p> <p><u>Issues 7/8</u> – proposed approach welcomed and concerns shared about impact on water environment. Would be interested in applying the Agency's risk assessment procedure.</p> <p>A holistic approach to inputs and outputs of agriculture is required.</p> <p>Support Agency in attempts to enforce and clean up discharges from non-mains treatment systems.</p> <p>We aim to implement the ideas outlined in the public information leaflet provided by NT/CIRIA and the Agency on Septic Tank Management.</p> <p><u>Issue 9</u> – Trust owns a number of old mine workings in the area. We are keen that these and other such sites are not considered for landfill – many are now important wildlife sites.</p>	<p>Support noted.</p> <p>Contact Sue Quinlan or Barry Russell.</p> <p>The overall impact of these schemes covers a number of issues. The Agency works closely with planners, developers and consultants at all stages of road schemes to ensure that impacts are minimised. For example, the Derby Southern By-pass A564 has incorporated pollution prevention structures on the highway drainage system to mitigate both "normal" discharges and spillages during RTA. This close liaison between the Agency and road building interests will continue and sit specific problems will be addressed.</p> <p>It is encouraging to have the Trust's support in this area. The Agency has little control over traffic movement, but it would be useful to obtain the support of all potential partners in identifying sources of air pollution. This means that actions to address the cause of pollution can be targeted.</p> <p>Support noted.</p> <p>Yes it will. Routine meetings are undertaken with Derbyshire Caving Association. This issue originates from Agency Officers' concerns over the potential health risks to cavers resulting from these discharges.</p> <p><u>6</u> – Support noted.</p> <p>Concern noted.</p> <p>Concerns noted.</p> <p><u>7/8</u> – Please feel free to contact either Rob Cunningham or Pete Hufton at our Alfreton office for any further advice.</p> <p>Please feel free to contact either Rob Cunningham or Pete Hufton at our Alfreton office for any further advice.</p> <p>Support noted</p> <p>Noted. Any further advice – come to us!</p> <p><u>9</u> – concerns are noted.</p>

Consultee	Comments	Issue Number/Response
<p>The National Trust, The High Peak Estate Office (Mr S Trotter, Property Manager) (cont'd)</p>	<p><u>Issue 11</u> – support for Agency – have experienced problems with tenants spreading waste on our land in other areas and would be willing to work with Agency to resolve these problems.</p> <p><u>Issue 12</u> – the Trust is a victim of fly-tipping – incidents cost much time and money. Hope to work with the Agency to clarify responsibilities for clearing wastes. The Trust participated in the Tidy Britain Group survey on the impacts of the Landfill Tax on fly-tipping.</p> <p><u>Issue 14</u> – whilst wishing to protect water supplies, the Trust is concerned about the consequences of increased restrictions on the options available to control bracken in the upper reaches of the catchment. Alternatives are not possible in Dark Peak terrain. Concern that the 160m buffer around watercourses is effectively a ban on the use of helicopters.</p> <p>Further definition of what constitutes a watercourse is also required.</p> <p><u>Issue 15</u> – The Upper Derwent needs protecting from further promotion of recreational access.</p> <p><u>Issue 16</u> – The Trust has also funded these surveys. The Agency should set “limits of acceptable change” and set out the monitoring and action processes, which will be triggered when the limits are exceeded.</p> <p><u>Issue 17</u> – support objective to minimise water usage.</p> <p><u>Issue 18</u> – The trust is responsible for habitat protection of many species listed. LEAP needs to tie in with English Nature Natural Area Profiles and with Natura 2000 sites. Trust has particular contribution to make in respect of; otters, water voles, bats, birds and all habitats. Would welcome assistance and partnership with the Agency over options 18.4.1, 18.6.2-3, 18.6.5-7, in areas where we currently do much work. Omission – no discussion over damaging impact of summer “wild fires”, and support for the use of reservoir water to fight fires in times of drought. Also link between silting up of reservoirs and loss of capacity due to the peat erosion on moorlands is omitted. Is linked to pollution, fires and overgrazing – about which the Agency might help to lobby and act for improvements.</p>	<p><u>11</u> – support welcomed</p> <p><u>12</u> – support noted</p> <p><u>14</u> – Issue has been reworded.</p> <p>Yes, we understand your responsibilities in relation to bracken control. Our responsibility – paramount that water used for drinking supply is protected at all times.</p> <p>A watercourse is defined in c57 of the Water Regulation Act 1991 PART IX as: “all rivers, streams, ditches, drains, cuts, culverts, dykes, sluices, sewers and passages through which water flows, except mains and other pipes which a) belong to a water undertaker or b) are used by a water undertaker or any other person for the purpose of only providing a supply of water to any premises”.</p> <p><u>15</u> – concerns are noted.</p> <p><u>16</u> – Omission noted. Happy to add to Action Plan.</p> <p><u>17</u> – support noted.</p> <p><u>18</u> – noted. We are trying to tie LEAPs to Natural Areas from a conservation point of view.</p> <p>Noted.</p> <p>Omission noted.</p> <p>The Agency is looking in to this.</p>

Consultee	Comments	Issue Number/Response
The National Trust, The High Peak Estate Office (Mr S Trotter, Property Manager) (cont'd)	<p><u>Issue 21</u> – carefully managed sites favoured as a means of providing renewable and sustainable energy.</p> <p><u>Issues 23/24</u> – support for pre-emptive measures</p> <p><u>Issue 25</u> – collection on more information on air quality welcomed, in particular sulphur dioxide and nitrogen/ acid deposition are affecting heathland, bogs and restoration efforts.</p> <p><u>S 5.10</u> – other conservation issues include: conservation of hay meadows, in-bye and rewetting for waders and other birds, and lead rake flora. The Trust would like to see the Action Plan fully resourced to implement the prescriptions.</p> <p>Concerned that the objectives should be specific, measurable and achievable within specified time periods.</p> <p>The Trust owns much land in the headwaters of the plan area – important role to play in protecting water quality in its upper reaches.</p> <p>Hope that the Agency aims to develop an integrated and holistic approach to management of the catchment – particularly to offer integrated advice to landowners and industry alike.</p>	<p><u>21</u> – noted</p> <p><u>23/24</u> – support is welcomed.</p> <p><u>25</u> – support welcomed</p> <p>There are many things which would be nice to add, but we had to restrict the document to reflect the issues of most pressing urgency to the Agency. So would we!</p> <p>We always aim to make our actions SMART (Specific, Measurable, Achievable, Realistic and Time Based).</p> <p>Noted.</p> <p>This is what we aim to do.</p>
NE Derbyshire District Council (Mr J Noad, Planning Assistant)	<p><b>Report considered at Planning Committee meeting 21 April 1998.</b></p> <p>The LEAP indicates its relationship with BAPs which the South Yorkshire and NE Derbyshire LEAP did not. The LEAP should compliment the work already carried out on the Mid Derbyshire BAP. Key objectives are consistent with the Council's vision statement. Care should be taken not to duplicate tasks i.e. air quality review and assessment. Agency should provide assistance and expertise to aid the process. Necessity for proper co-ordination and liaison.</p> <p>In relation to contaminated minewaters perhaps consideration should be given to involving the Coalfield Communities Campaign in addition to those organisations listed.</p> <p>A greater co-ordination of effort and input into the LA21 process would be beneficial.</p> <p>The Agency plays a vital role in the conservation and preservation of the environment. The LEAP should ensure that their activities are carried out in a more integrated manner.</p>	<p>Agreed.</p> <p>Consistency noted!</p> <p>Agreed.</p> <p>This is considered to be only a minor problem in this area. The Agency is heavily involved with it in other areas.</p> <p>Noted and agreed. Efforts are being made to bring the two processes closer together in the area.</p> <p>Noted and agreed (hopefully)!</p>
Ockbrook PC, (Mr G E Taylor, Clerk)	<p>Questionnaire received.</p> <p><b>Other issues to be included in the plan.</b></p> <p>More commentary on defence against flooding – from Spondon to river Trent.</p>	<p>The Agency considers that the existing flood defences downstream of Spondon are adequate and therefore we have no current proposals for improving these defences.</p>

Consultee	Comments	Issue Number/Response
<p>Ockbrook PC. (Mr G E Taylor, Clerk) (cont'd)</p>	<p><b>Major errors or omissions:</b> Flooding of the area does not appear to be adequately investigated and reported. If you improve flood defences elsewhere, what do you propose for the Lower Derwent below Spondon? This plan has been reported on recently by a government inspector who is concerned about flooding possibilities. Should gravel extraction be extended in the Ambaston/Elvaston area? Could the Leap address this flooding issue? The Council would welcome consultation from the Agency and a public meeting would be appreciated.</p>	<p>A survey has been carried out in order to check the level of the existing flood defences protecting the village of Ambaston. No deficiencies have been identified requiring remedial work by the Agency. The Agency is very willing to answer any further queries from the PC and prefer to deal with these on an individual basis, rather than at a public meeting. It is not considered that extension to the sand and gravel extraction at Elvaston Quarry would increase flood levels or extend the flood plain area subject to planning constraints being observed.</p>
<p>PDNP Authority (Mr J Thompson, Ass. Nat. Park Officer, Head of Recreation)</p>	<p>Report welcomed. Issues and options are well presented and are a good basis for the preparation of the Action Plan.</p> <p><u>Issue 1</u> – concerns PDNP – urge recognition of need for partnership funding and restoration work as part of Action Plan.</p> <p><u>Issue 2</u> – of concern and has been raised with the Agency in the past. Any solution needs to take into account both wildlife and cultural heritage interests.</p> <p><u>Issue 6</u> – Severn Trent has a major engineering and structural investment programme in the area at present for the Millennium – caving activity in the limestone (White Peak) area.</p> <p><u>Issue 7</u> – support for issue. Greater emphasis could be given to the fact that the Peak is a major Regional and National Reserve for caving authority in the limestone area (White Peak).</p> <p><u>Issue 8</u> – highlighted as an issue at National level. Specific option for Peakshole Water welcomed, as well as other, wider options proposed to monitor, review and educate.</p> <p><u>Issue 14</u> – code of practice on bracken spraying in the Peak developed in consultation with the Agency and other interests.</p> <p><u>Issue 15</u> – a) need for integrated approach. South Pennines Integrated Transport Strategy to be acknowledged and reflected in Action Plan. b) link recreation access to conservation and local community considerations, integrated public transport, visitor and traffic management and positive formation, interpretation and education. c) relevance of proposals for footpath and cycle way improvements and routes up the Derwent Valley by Derbyshire County Council, the Peak, other authorities and the Derwent Valley Trust (Heritage Way).</p>	<p>Support welcomed.</p> <p><u>1</u> – the Agency has already provided funds for the structural survey and assessment of restoration costs and is active in the project. The Action Plan will recognise the need for partnership work, although the Agency does not have the funds for repair.</p> <p><u>2</u> – concern noted. Extensive monitoring works are being carried out. WR to let other bodies know what we are doing.</p> <p><u>6</u> – thanks – we are in discussion with STW Ltd.</p> <p><u>7</u> – support welcomed. Comments noted and will be reflected in Action Plan.</p> <p><u>8</u> – support noted.</p> <p><u>14</u> – information noted.</p> <p>a) agreed – see Section 5.4.2.1 in Action Plan.</p> <p>b) noted.</p> <p>c) agreed.</p>

Consultee	Comments	Issue Number/Response
<p>PDNP Authority (Mr J Thompson, Ass. Nat. Park Officer, Head of Recreation). Cont.</p>	<p>d) interest in reopening Matlock – Buxton railway beyond Rowsley.</p> <p>e) existence of long established Area Management Plan partnership in Upper Derwent Valley with the Agency, Severn Trent, Derbyshire County Council and other interests.</p> <p>f) renewed interest in canoeing on the Rivers Wye and Derwent. Agency role to make progress lacking in past efforts?</p> <p>g) Action Plan to emphasise need for an integrated approach to public transport, traffic and visitor management. Agency funding to assist such initiatives would be welcome.</p> <p><u>Issue 16</u> – PDNP Archaeological Service has carried out an archaeological survey of the Upper Derwent as acknowledged in report. Ongoing for another four years. Action on Pennine Way and adjoining moors being co-ordinated by Mike Rhodes. Most cost being met by CoCo.</p> <p>Further survey work would be welcomed and a strategy for action elsewhere in area covered by LEAP. Ken Smith to liaise with you over this in relation to work already done and future possibilities.</p> <p><u>Issue 18</u> – PDNP are producing a BAP for the Peak. Rhodi Thomas to liaise over this and the environmental strategy issue related to access to watercourses. BAP action plans to be published later this year.</p> <p><u>Issue 25</u> – key issue. Agency is urged to pursue more information on this and action to address the problem. Agency letter of 29 October 1997 relevant.</p> <p>Additional Points – Losehill Hall 28 November 1996 – partnership with PDNP Education Service. This LEAP provides an excellent opportunity to develop partnership and joint funding opportunities as well as demonstrating specific action arising from the Accord signed between the Agency and Association of Park Authorities on 20 September 1996. Action Plan to refer to that?</p> <p>Conclusion – will be happy to discuss further. Look forward to seeing Action Plan and scope for working together with us on issues raised.</p>	<p>d) Noted.</p> <p>e) Noted.</p> <p>f) the Agency actively supports this.</p> <p>g) agreed but the recreation budget is very small!</p> <p><u>16</u> – noted.</p> <p>Noted.</p> <p><u>18</u> –The Agency would be interested to see the BAP when it is produced. Val Holt has liaised with Rhodri Thomas.</p> <p><u>25</u> – concern noted. Letter not traced – not sent to LEAPs section. Who was it addressed to?</p> <p>Lower Trent Area was not present at this event. What is the Accord? We here have not seen it.</p> <p>Noted.</p>
<p>Peak Rail Ple (Mr J Clegg, Chairman)</p>	<p>Questionnaire received.</p> <p>Disagree with vision of the area. If the objective is to be met, greater attention to access, i.e. TRANSPORT will need to be given. This is imperative to protect the environment.</p> <p>Other issues: more attention to provision of public transport i.e. opening of Buxton to Matlock railway line. This to improve access and allow car restraint measures to help protect environment.</p> <p>Omissions: attention to public transport.</p>	<p>The Agency has no remit in relation to transport and can only hope to persuade the relevant authorities without being seen to tread on toes. We agree more mention could be made of the problem, and will add something to the Action Plan. See Section 5.4.2.1.</p> <p>Noted. See Section 5.4.2.1 in the Action Plan.</p> <p>Noted.</p>

Consultee	Comments	Issue Number/Response
Ramblers Ass., SYNED Area (Mr A Pestell, Access/ Countryside Officer)	Questionnaire received. Issues omitted: Oestrogenic chemicals and treatment.	The Agency is aware of the Oestrogenic issue and the feminising effect on fish. This is a national issue and not specific to the Derwent. The problem is being addressed by the Agency through its National Research and Development programme. Any outputs or recommendations from this research will be taken as part of the every day work of the Agency. It is not therefore considered to be a specific issue for the Derbyshire Derwent LEAP.
Ramblers Ass., Manchester Area (Mrs J Cliff, Countryside Officer)	Questionnaire received. As ramblers, our concern is with walking, so we would therefore like access to riverbank area for this purpose. We do recognise that there are some sensitive areas for wildlife, which should be avoided, especially at certain times of the year. Our aim is to be responsible walkers and users of the countryside. We wish to walk in areas rich in wildlife. We therefore want to see priority given to anti-pollution measures, water saving and biodiversity.	Concerns noted.
Ramblers Ass., Derbyshire Area (Mr D B Nicholas)	Questionnaire received. Other issues; effect of atmospheric pollution on the countryside.	This is rather a wide subject area and might not be done justice in the LEAP. It would be more manageable to address specific areas of concern within this overall subject.
Mrs A Robinson, Alport Castles Farm	Overall very informative of environmental problems arising in the area. Disappointed that environmental benefits and disadvantages of options offered to solve the individual issues were not appraised. Absolute cost not specified, but would have helped. <u>Issue 6</u> – as the loss of the trout acts as a marker for poor biodiversity, management of abstraction and compensation for water loss in both these rivers must be adjusted to avoid a dry riverbed. <u>Issue 8</u> – one of the most serious in the report (with issues 3, 4, 7, 10, 11, 14, 18 and 19). All threaten the safety of the environment or are a consequence of that threat. Must take precedence over other issues where only recreational or archaeological issues are at stake. <u>Issue 11</u> – agree with concern about spreading of waste on land purportedly for agricultural purposes. Spreading of waste paper pulp does not seem to have been considered. Clear code of practice required. <u>Issue 12</u> – recycling facilities available in my area are very disappointing. Glossop and Sheffield provide adequate facilities for glass, aluminium cans and paper but there are no facilities for coloured plastic bottles, food packets made of various polymers, or wood. Agency need to place much more emphasis on recycling on all sorts of waste to ease pressure on civic amenity sites.	LEAPs are being improved all the time and the newer LEAPs being produced do have indicative costs at this stage. <u>6</u> – we agree! <u>8</u> – agreed! The Agency aims to listen to all views. The issues are not prioritised in any way and achievement of all actions will contribute towards sustainable development. <u>11</u> – support welcomed. Issue rewritten in Action Plan. <u>12</u> – these comments really need to be addressed to the Local Authority concerned. The Agency wants to encourage recycling but waste minimisation is more fundamental to the problem.



Consultee	Comments	Issue Number/Response
<p>Rural Development Commission (Mr Tony Harvey, Regional Planning Officer) (cont'd)</p>	<p>However the text on page 45 concentrates on the issue of contaminated land, whilst the table refer to derelict land restoration.</p> <p>We support the principle aim in this part of the LEAP in encouraging the bringing back such land into beneficial use, but it could be confusing to talk about derelict and contaminated land in the same way.</p> <p><u>S4.3.2 p51</u> – a narrow interpretation of the aim to minimise travel by car – this would disadvantage rural communities, where the issue is more related to the availability of needed services.</p> <p><u>Appendix 4</u> – concern with the wording of the “greenbelt” definition. The LEAP reader would not be properly advised in reading the definition as it is working. It should be revised to more accurately reflect the statutory definition of greenbelts.</p>	<p>Comments noted – we have revised the text for the Action Plan!</p> <p>Comments noted.</p> <p>Comments noted, our glossary will be amended.</p>
<p>Severn Trent Water Ltd (Mr J Martin)</p>	<p>Supportive of aims of LEAP programme with respect to environment improvement, sustainable development and biodiversity and are glad of the opportunity to comment.</p> <p>Concerned that the Agency takes full account of DETR and Agency National policies such as those for Water Service Companies (WSC) investment as expressed in the AMP2 Effluent Quality Guidelines and any similar guidelines relating to future AMPs. Also the implications of the mechanism in place for determining levels of WSC expenditure through the Periodic Review process. Report seems to take these constraints into account.</p> <p>Issues and options for actions – in many cases the extent of the problem is not well quantified and proposals have not been costed.</p> <p>Also of concern is the translation of the many potential solutions proposed into a management plan.</p> <p>It is hoped that as the plan is developed, there will be further consultation on specific issues with interested parties.</p> <p>Reference in several issues to problems downstream of Derby caused by storm overflows and discharges from the Southern Surface Water Sewer. We feel that the report should make more mention of the fact that we are well into a major development programme expected to cost in the region of £30M to address these long standing problems.</p> <p>Already involved in liaison with Agency on range of topics. Most issue to be progressed through such liaison.</p> <p><u>Issue 3</u> – ongoing liaison with Agency, particularly in relation to Chaddesden. Opportunity for Agency to highlight priority areas for investigation during AMP3.</p> <p><u>Issue 4</u> – costs for phosphorous reduction at Derby STW have been included in AMP3 submission to OFWAT pending DETR decision on designation.</p>	<p>Support noted.</p> <p>We do try!</p> <p>The Action Plan includes costings wherever possible.</p> <p>Concern noted.</p> <p>There will be further specific consultation with interested parties once this statement is issued.</p> <p>Information noted and included in Action Plan.</p> <p>Noted.</p> <p>3 – information noted.</p> <p>4 – information noted</p>



Consultee	Comments	Issue Number/Response
Severn Trent Water Ltd (Mr J Martin) (cont'd)	<p>Major improvements are currently being planned for Derby STW. Emphasis on importance of other contributory factors such as flow management in maintaining the quality in the Lower Derwent.</p> <p><u>Issue 6</u> – historical arrangements for compensation water to the Noe via Jagers Clough are recognised as something of an anomaly and are in discussion with the Agency over the possibility of changes.</p> <p><u>Issue 7</u> – issue previously identified by the Agency and the need for improvements formed part of our AMP3 submission.</p> <p><u>Issue 17</u> – issue already the subject of discussion between the Agency and Severn Trent. Validity of issue raised is recognised and will be happy to co-operate in further discussions on the subject.</p> <p><u>Issue 20</u> – Severn Trent has undertaken a number of major initiatives to inform customers on sensible use of water and reduce leakage.</p> <p><u>Issue 21</u> – potential impact of hydropower sites on river flow and quality recognised and need for careful management to avoid potential problems.</p> <p><u>Issue 22</u> – potential presence of contaminants in groundwater from Pride Park and other sites is recognised.</p>	<p>Noted</p> <p>Noted</p> <p><u>6</u> – noted</p> <p><u>7</u> – noted</p> <p><u>17</u> – noted</p> <p><u>20</u> – noted</p> <p><u>21</u> – support noted</p> <p><u>22</u> – support noted.</p>
Shardlow PC (Mrs Eccles, Parish Clerk)	<p>Questionnaire received.</p> <p>Issues omitted: insufficient attention to Lower Derwent and Lower Trent. No mention of mineral extraction.</p> <p>Major errors: no mention of dangerous industries or spraying of verges.</p>	<p>The Lower Trent is being addressed in a separate LEAP launched in March 1999. Gravel extraction has been mentioned in relation to archaeology. Although site specific site issues are not covered in detail, Issue 19 addresses releases from major industries and Issue 25 addresses air quality data. IPC regulated industries are listed on page 63 of the consultation report, together with related significant issues. If by spraying of verges you mean road verges, then it is the responsibility of the Highway Authority.</p>
South Derbyshire District Council (Mr J Birkett, Head of Planning)	<p><b>Planning and Economic Development Committee meeting 9 April 1998.</b></p> <p>Expressed support for the plan in general, but that the Agency be requested to give further consideration and higher priority to the issue of mineral workings and their possible effect on the environment.</p> <p>Agree in principle to Council involvement in the implication of action points proposed in the report.</p>	<p>The Agency recognises the problems with dewatering activities associated with mineral extraction, but under current legislation we have limited powers to control them. Wherever possible we will endeavour to limit the impact on the environment through planning procedures. This can only be achieved with new proposals.</p> <p>Support noted.</p>

Consultee	Comments	Issue Number/Response
<p>Staffordshire Wildlife Trust (Ms R Hering, Upper Trent Otter &amp; Water Vole Project Asst.)</p>	<p><u>Issue 2</u> – the River Lathkill is one of the primary routes for recolonising otters from the Upper Trent and River Dove catchments into the Derwent. The low flow records for the Lathkill, combined with a poor fishery may well be acting as a limiting factor to otters making use of the river.</p> <p><u>Issue 8</u> – problem is of national importance. Wildlife Trusts would like the Agency to ban these chemicals until specific action of licensing and a policy on the strict control of use and disposal is introduced. LEAP is an ideal forum for tackling this problem at local and county level, with the opportunity to educate and advise simultaneously.</p> <p><u>Issue 15</u> – access to watercourses is important, but there are many sensitive habitats and species. Otters require a diverse riparian habitat in which to rest and breed. It is vital that this is left undisturbed in areas that otters are known to use. Recreational accesses to be directed away from sensitive sites for otters.</p> <p><u>Issue 18</u> – Otter Survey of England (1991-94) by Vincent Wildlife Trust -- baseline data of otters on the upper reaches of the Derwent catchment. Data shows suitable habitat for otters to breed.</p> <p>LEAP is an ideal method to promote otter conservation. It is important for the recolonisation of the otter back in to central and eastern England that any potential otter habitat be integrated into development and planning processes.</p> <p><b>Actions:</b></p> <ul style="list-style-type: none"> <li>- determine present distribution and status</li> <li>- develop targets for protection at local level</li> <li>- Identify suitable safe havens and promote management to protect and create new ones.</li> <li>- Identify threats and pinch points, create new habitat in conjunction with river maintenance works and habitat improvement schemes.</li> <li>- monitor distribution – rolling programme of surveys. Mention to be made of otters and roads (otter surveys prior to planned road schemes).</li> </ul> <p><u>Voles</u> – water vole Survey of England (1989-90) by Vincent Wildlife Trust --baseline data. Only found at a few sites on upper tributaries of Derwent, then further down between Derwent and Wye confluence to the Amber.</p>	<p><u>2</u> – agreed – low flows in the Lathkill will be impacting on many species of flora and fauna and the otter will certainly be one of these species affected. It is also possible that otters may move between catchments via the River Bradford/or via Carsington Waters to the South.</p> <p><u>8</u> – agreed about the importance. We can't ban them can we?</p> <p><u>15</u> – it has long been recognised that the needs of conservation and recreation need to be carefully balanced in order to reduce the impact of disturbance on populations of sensitive species. The impact of recreation will continue to be assessed when exploring recreational opportunities within the catchment.</p> <p><u>18</u> – the Agency currently considers the needs of expanding otter populations when commenting on planning applications and drainage consents. This included road schemes, culverts and riparian engineering works.</p> <p>Information noted.</p> <p>These recommendations for action have been noted and will be included in the Action Plan where appropriate. They will primarily be driven by the Wildlife Trusts.</p> <p>Information noted. These recommendations for actions have been noted and will be included in the Action Plan where appropriate. They will primarily be driven by the Wildlife Trusts.</p>

Consultee	Comments	Issue Number/Response
Staffordshire Wildlife Trust (Ms R Hering, Upper Trent Otter & Water Vole Project Asst.). Cont.	<ul style="list-style-type: none"> <li>- survey main rivers and any other suitable habitat for current colonies.</li> <li>- identify threats to colonies, promote riparian management methods.</li> <li>- initiate scheme of habitat creation for water voles in strategic areas to promote expansion of existing colonies.</li> <li>- set up system of "key sites"</li> </ul> <p>Issue 24 – it is important that the habitat requirement of both otters and water voles are considered during any planning process for development close to a river or in a floodplain. Lower Trent Otters and Rivers Project pending, full support needed.</p>	<p>24 – the Agency currently considers the needs of expanding otter populations when commenting on planning applications and land drainage consents. This included road schemes, culverts and riparian engineering works. Information noted – the Agency will provide full support for this. It is reported on in the Lower Trent and Erewash LEAP.</p>
Mr A Stringer, Somercotes	<p>Questionnaire received. Other issues to be included: plan to get rid of storm sewer flows.</p>	<p>Combined Sewer Overflows (CSOs) are a national problem. There are approximately 25 000 in the Midlands Region. The practicalities, disruption and cost of removing all these from the sewerage system would be completely out of proportion with the environmental benefits. Recognising this fact, all overflows have been given an environmental risk assessment. This incorporated a review of the biological and chemical data on the receiving stream, number of public complaints, overflow location and so on. This showed that the vast majority of the overflows were satisfactory, having little or no impact on the receiving watercourse. The remainder (approximately 230 CSOs in the Midlands Region) have been identified as requiring improvement. These are being prioritised for improvement based on a number of factors including operational performance, impact on aesthetics and water quality and the sensitivity of the receiving water course. Locally this procedure has resulted in massive planned investment in sewerage infrastructure improvements aimed at reducing the overall number of CSOs and improving some of those that remain.</p>
Sustrans, Midlands (Mr P Foster)	<p>Only comment is that we are working with the Las to help with the issues raised in 4.3.2. (P51) on the following national projects; the National Cycling network, the Safe Routes to School, Routes to Railway Stations, Pathways to Health and Pennine Cycleway.</p>	<p>Information noted.</p>
Mr T Taylor, Chesterfield	<p>Questionnaire received. An excellent, well presented report. Extensively researched and extremely thorough. Well done! Feel there is a need to identify and register sites of rare plant species associated with watercourses to try and ensure their protection. Examples such as <i>Equisetum hyemale</i> – Biggin Brook, Millington Green (probably just outside the plan area).</p>	<p>Thanks. Rare / scarce plants will have been picked up in the Derbyshire BAP by Derbyshire Wildlife Trust and Derbyshire County Council. We have been in direct consultation over the BAP and the targets contained within it.</p>
Mrs E Thorpe, Matlock	<p>Questionnaire received.</p>	

Consultee	Comments	Issue Number/Response
Mrs E Thorpe, Matlock (cont'd)	<p><b>Other issues to be included:</b></p> <p><u>Issue 18</u> – include exposed riverine sediments (please refer to your own EMS R&amp;D Technical Report W11, 1997) as a habitat for which you have a special responsibility. It should be included among the Mid-Derbyshire BAP habitats.</p> <p>Comments – I am rather concerned about the recent increase in urban development within the river environment around the north of Matlock. This is a more natural stretch of the river that deserves better protection. I would like to see more and better input from the Agency into proposed development, including that adjacent to the floodplain, if not within it (when defined). I understand that at least some mitigation measures could be used and if that is so, they need to be proposed more frequently, with more geomorphological input.</p>	<p><u>18</u> – exposed riverine sediments are not on the list of biodiversity habitats for the Derbyshire BAPS.</p> <p>Unfortunately, as statutory consultees we act in an advisory capacity only when responding to planning consultations and the decision to grant planning permission rests entirely with the LPA. However, the Agency has its own powers to regulate development within a river channel or within 8 metres of the edge of the riverbank. For proposed development outside the floodplain, the only mitigation measures that the Agency can request is in connection with surface water regulation or maintaining access to the river. Were you referring to conservation measures?</p>
Mr G W Thorp, no address given	<p>Questionnaire received.</p> <p>Visible lack of action or pressure since the Agency has taken over from NRA. If a tree or obstruction impeding the flow, one phone call and this was dealt with, with great respect for riparian crops and time of year.</p>	<p>Major rivers are inspected twice a year and minor rivers at least once a year, always with a great respect for riparian crops and time of year. We respond to all notifications, which are dealt with on a priority basis.</p>
Mr N P Tompkins, Brailsford	<p>Questionnaire received.</p> <p>All the issues defined are worthy and need pursuing. Selecting and grading just five has been very difficult. Some issues are relatively trivial but very urgent (e.g. invasive plant species). I hope that the process of selecting five issues does not mean that the Agency intends to make progress on only a limited number of the issues presented in the LEAP document and that all are pursued to a greater or lesser extent up to the constraints placed by Agency budgets.</p>	<p>Noted. The questionnaire and selection of five issues of most importance was purely to gain favour of what you think is important. We agree they are all important and rest assured we aim to achieve action on all of them over the next five years (budgets willing)!</p>
Transport 2000, Derbys. & Peak District Group (Mr C Ryan, Chairman)	<p>No comments made.</p>	<p>-</p>
Ms J Turville, Mackworth, Derby	<p>Questionnaire received.</p> <p>Other issues to be included: the floodplains around the A38 could be considered for protection, as the land floods very badly (twice in the last rainfalls).</p> <p>The Alvaston Lake could be cleaned like the Mundy Play Centre.</p>	<p>The Agency is not proposing to construct any flood defences for protecting the floodplain adjacent to the A38.</p> <p>The Alvaston Lake belongs to Derby City Council, who are responsible for cleaning it up.</p>

#### **4 Further action**

The comments made in response to the consultation report have been taken into account and included where appropriate in the Action Plan. During the consultation process and via the responses, many of the organisations expressed an interest in working in partnership towards resolving the issues highlighted in the plan. Many of the actions have required further dialogue with the appropriate organisations prior to the drafting of the Action Plan.

A number of changes to the issues, options and proposals have been made as a consequence of this public consultation exercise. Partnerships are being developed through meetings with key organisations and groups.

We have considered the responses made and have developed the Action Plan in a way that reflects a balance between the opinions expressed and the need to ensure a workable and feasible plan.

The Action Plan has now been published. It identifies the appropriate actions to resolve the issues addressed and has a five year timetable, costed where possible. Progress will be monitored and reported via an Annual Review which will be sent out to all key organisations and interested parties. The whole process of consultation will begin again after five years.

Consultee	Comments	Issue Number/Response
Ms J Turville, Mackworth, Derby (cont'd)	The report is very concise and well written. It has brought problem areas to the public's eye and now something can be done about it.	Thanks.
University of Huddersfield, Dept. of Geog. & Env. Sci. (Prof. J Gunn)	<p>Questionnaire received</p> <p>Other issues to be included: there are many lead mine soughs in the Peak District which still transmit groundwater. It would be worthwhile to consider their state of repair and implications for surface water quantity and quality. This relates to Issue 16, but extends beyond it.</p> <p>Major errors of omissions: the boundary of the carboniferous limestone is significantly in error on Map 5a, 5b and 7. The limestone extends up to Castleton where springs from the limestone form the source of the Peakshole Water.</p> <p>Notwithstanding the geological error, this is a very good plan and I applaud the Agency's objectives for the plan area.</p>	<p>We agree, but the Agency can't consider it. Perhaps STW would have an interest in their maintenance.</p> <p>Error noted.</p> <p>Thanks.</p>
Yorkshire Water Services Ltd (Mr E Bramley, Principal Adviser – Env. Regulations)	<p>Document found to be generally well structured and presented, with a professional balance of issues raised.</p> <p>The only part of the LEAP, which Yorkshire Water has a direct interest in, is the bulk transfer of water from the Severn Trent Ladybower Reservoir to our Rivelin treatment plant as documented in S5.8. There do not appear to be any proposals, which would impact on this raw water transfer, including the reliability of these sources. The company would welcome confirmation that this is the case (particularly in light of issue 6).</p> <p>From a personal standpoint, I note comments in S5.12 on climbing, that the British Mountaineering have not contributed to this report (address supplied).</p>	<p>Thanks.</p> <p>We are not aware of any proposals to change existing practice.</p> <p>Information noted.</p>
Yorkshire Water Services Ltd, Finance and Regulation Directorate (Mr G Roberts, Head of Safety, Health & Environment)	Would like to congratulate you on the style of the report, which is more professional and less accusatory than others I have seen. No substantive issues to make, but will be following up several comments where we feel further collaboration would be helpful.	Noted, thanks.