

# Severn Uplands

Local Environment Agency Plan

## Report on Consultation

Summary of Public Consultation Responses

July 1999



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## Foreword

The Environment Agency is committed to public consultation, and 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. For the Severn Uplands LEAP we undertook an extensive public consultation exercise between December 1998 and March 1999, including local authorities, environmental and conservation organisations, local interest groups, parish and community councils as well as the general public. This report presents a summary of the comments that were received, and shows how the comments were responded to and taken into account in the Severn Uplands Action Plan where appropriate.

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This document needs to be read in conjunction with the Severn Uplands LEAP Consultation Report and Action Plan.

Severn Uplands Consultation Report – December 1998 (*now out of print*)

Severn Uplands Summary Booklet and Leaflet – December 1998

Severn Uplands Action Plan – July 1999

The Action Plan and Summary documents are available free from the Upper Severn Area Office.

The Severn Uplands LEAP can also be found on our website at:  
[www.environment-agency.wales.gov.uk](http://www.environment-agency.wales.gov.uk)



## **1.0 Review of the consultation process**

### **1.1 Background**

The Severn Uplands LEAP Consultation Report was launched for public consultation by the Environment Agency in December 1998. The Consultation Reports, summary booklets and leaflets were widely distributed to individuals and organisations, who were invited to comment on the report and on local environmental problems. Written comments were received as letters, faxes, e-mails and completed questionnaires from the summary booklets.

### **1.2 Informal consultation**

In June 1998, the Agency wrote to all the Local Authorities in the area and representatives of around 65 other organisations that have an interest in the local environment. This pre-consultation exercise was designed to focus on key groups and organisations that were likely to have information and ideas about the sort of environmental problems facing the area, and to give them an early opportunity to comment on the issues and raise any new issues. All comments from this initial informal consultation were considered and where appropriate were incorporated into the Consultation Report. The members of the Area Environment Group were also consulted.

A sub-group of the Upper Severn Area Environment Group was set up for the Severn Uplands LEAP. The members, Mr Tony Bostock and Mr Selby Martin, participated in the development of the Consultation Report. Mrs Linda Pocock and Mr John Markwick joined the sub-group in May 1999.

### **1.3 Formal consultation**

The Consultation Report was launched at a press briefing on 7 December 1998 at New Cut argae, Arddleen, near Welshpool in the area of the Severn-Vyrnwy floodplain. Copies of the Consultation Report and Summary booklets were distributed to over 500 consultees on our mailing list and on request, together with information about a public seminar to be held later in the three-month consultation period.

A public seminar was held on 24 February 1999 at the Powys County Council Chambers in Welshpool. The aim was to provide a forum to discuss the environmental issues raised in the Consultation Report. The seminar was publicised in advance by invitations to consultees, press releases, public notices in the local press and by radio. There was a full house, with over external 75 delegates attending, representing a wide range of interests from within the area including local authorities, environmental and conservation organisations, farmers, internal drainage boards, parish and community councils and members of the public.

The formal three month consultation period ended on 12 March 1999. During this time the Consultation Report was promoted by:-

- Radio interviews, TV interest, press releases and public notices in the press.
- Our website, featuring the Severn Uplands LEAP on [www.environment-agency.wales.gov.uk](http://www.environment-agency.wales.gov.uk)
- Wide distribution of the Summary Booklet, which included a questionnaire, and Leaflet.
- Display boards about the LEAP, which toured nine venues including libraries and leisure/shopping centres.
- Copies of the report placed on deposit at Local Authority offices and libraries.

## 2.0 Summary of responses

A total of 100 responses to the consultation were received, 51 letters and 49 questionnaires.

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, Table 1. The questionnaire responses are shown in Table 2. An analysis of the questionnaire responses is given on page 3, showing which LEAP issues and objectives people thought as most important.

All comments have been considered, and where appropriate and practicable, incorporated into the Action Plan. 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 summarised in Appendix 2 of the Action Plan. All letters and questionnaires were acknowledged, and detailed responses were sent to the majority of those who sent letters.

Several meetings were held with various organisations after the consultation period, including a joint meeting with the Farmers' Union of Wales, National Farmers Union (Wales) and Country Landowners Association and Environment Agency officers.

The consultation process has given us a more comprehensive 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:

### **Issues 1-3 – Water resources issues**

There were misconceptions over the role of Clywedog reservoir, which many people thought was built for flood relief. The reservoir's prime purpose is to enable public water supply abstractions to be sustained during dry summer months, whilst ensuring sufficient flow in the River Severn to maintain environmental needs.

### **Issue 4 - Loss of biodiversity**

Many consultees raised concern over damage to wildlife habitats resulting in loss of species, and activities in the area which cause damage to wildlife habitats. Several pointed out that as farm incomes decline, individual farm businesses no longer have the financial resources to undertake environmental maintenance and improvements that are essential to improving biodiversity. Some consultees considered the LEAP was inconsistent in its approach to the restoration of the Montgomery Canal, and emphasised the need to consider the recreational, archaeological, educational and economic benefits amongst others, and the longstanding commitment to include nature conservation in the restoration programme.

### **Issue 5 - Protection of rare and threatened species**

Many consultees expressed concern about the species requiring special attention in the area. Also the need for LEAP actions to be expressed in terms of Biodiversity Action Plan (BAP) special protection requirements was raised.

### **Issue 6 - Restoration of damaged habitats**

Issues relating to wetland creation and invasive plants were raised by a number of consultees.

**Issue 14 - Increased demand for amenity and recreation opportunities**

This issue was selected as important by many organisations. Of particular concern was access to footpaths, canoeing interests and access and fishing opportunities. Also, the implications of access for recreation upon sensitive areas and ecology.

**Issue 16 - Environmental strategy for the Severn-Vyrnwy Confluence area**

A number of organisations raised concern at the balance between flood defence and biodiversity/conservation responsibilities. The need for compensatory schemes for farmers and consultation with the community was raised.

**Issue 17 - Severn-Vyrnwy Confluence - maintenance of the argae system**

This issue was selected as an important concern by many organisations. Several commented on the benefits of using suitable borrow pits as wetland habitats and the need to identify them in a strategic manner.

**Issue 21 - Impact of land use changes, including hill land improvements and afforestation, on rates of run-off**

Many consultees were concerned over the effects of land use changes, importance of best forestry practice, and conversion of riverside to arable use.

**Section 4: A Better Environment through Partnership**

This was welcomed by the majority of organisations and individuals. Consultees welcomed the opportunity of working with the Agency with mutual aim of environmental improvement. Emphasis was placed on education, sustainable development and biodiversity.

In the Summary Booklet questionnaire responses, most of which were sent in by the general public, the issues considered to be the most important were, in order:

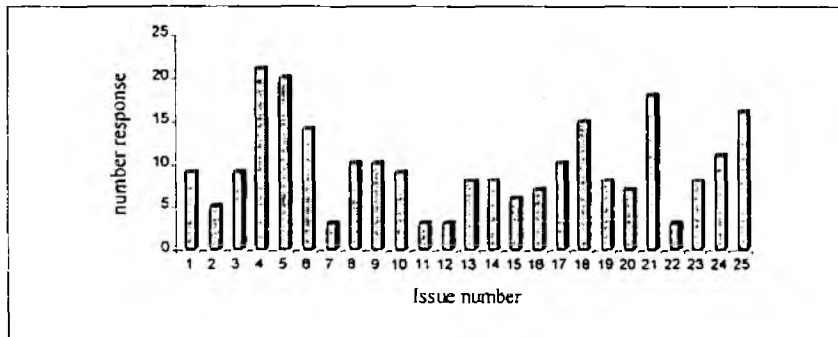
- Issue 4      Loss of biodiversity.
- Issue 5      Protection of rare and threatened species.
- Issue 21     Impact of land use changes, including hill land improvements and afforestation, on rates of run-off.
- Issue 25     The need to raise and promote environmental awareness and education.
- Issue 18     Increased threats of pollution from sheep dipping, and
- Issue 6      Restoration of damaged habitats.



Summary Booklet questionnaire responses

**Figure 1** Issues that were selected as most important in the questionnaire

Issues selected as most important. Respondents were asked to tick the five most important issues.

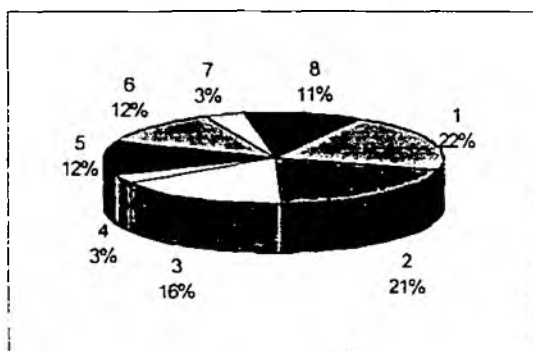


- Issue 1: Review of River Severn regulation controls and reservoir applications
- Issue 2: The role of strategic water resources
- Issue 3: Reliability of water supplies in meeting peak demands
- Issue 4: Loss of biodiversity
- Issue 5: Protection of rare and threatened species
- Issue 6: Restoration of damaged habitats
- Issue 7: Obstacles to salmon migration
- Issue 8: Protection, maintenance and improvement of brown trout populations
- Issue 9: Surface water acidification
- Issue 10: Non compliance with River Quality Objectives (RQOs)
- Issue 11: Non compliance with EC Directives for 1997
- Issue 12: Reduction in dilution afforded effluent discharges to River Morda
- Issue 13: Sewerage and sewage disposal in rural areas
- Issue 14: Increased demand for amenity and recreation opportunities
- Issue 15: Unauthorised and other environmentally damaging river works
- Issue 16: Environmental strategy for the Severn-Vymwy Confluence area
- Issue 17: Severn-Vymwy Confluence-maintenance of the argae system
- Issue 18: Increased threats of pollution from sheep dipping
- Issue 19: Development of flood warning system
- Issue 20: Floodplain management
- Issue 21: Impact of land use changes, including hill land improvements and afforestation, on rates of run-off
- Issue 22: Landspreading for agricultural improvement
- Issue 23: Sustainable waste management
- Issue 24: Illegal waste deposits
- Issue 25: The need to raise and promote environmental awareness and education

**Figure 2** Objectives that were selected as most important in the questionnaire

Respondents were asked to tick the three most important objectives.

% of response of Objectives selected as most important.



List of objectives

- 1 Seek to ensure that development in the area is environmentally sustainable.
- 2 Maintain the highest possible level of protection for the water environment, restore damaged habitats and protect rare and threatened species.
- 3 Improve water quality where achievable to meet long term River Ecosystem objectives.
- 4 Improve fisheries by making spawning areas in rivers more accessible to migratory fish.
- 5 Ensure proper management of the catchment's valuable water resources
- 6 Promote waste minimisation and recycling to encourage better management of waste products.
- 7 Improve recreational and amenity access to watercourses where environmentally appropriate.
- 8 Educate and raise awareness of the local environment and environmental issues.

### 3.0 Comments received and the Agency's response

A summary of the main comments and views raised by consultees in the 51 letters received, and the Environment Agency's response and action taken, is shown in Table 1. Responses to the questionnaire, which formed a pull-out section of the Summary booklet, are summarised in Table 2. New actions identified as a result of consultation are highlighted in bold.

Table 1 Summary of written responses

Consultee	Comments	Response/reference in Action Plan
Mr K Bateman	Expressed concern over potential lead shot pollution at a shooting ground site at Haimwood, and a planning application for a go-kart racing track.	Concerns noted. Water quality monitoring results upstream and downstream of the site do not indicate any increase in lead pollution, however as a safeguard additional monitoring is being carried out closer to the site. The Agency, as a statutory consultee, has taken on board these concerns in its response to the Local Planning Authority, although some concerns such as safety are not within our remit.
Mr G Bevis	Tributaries should be included in the Severn Uplands LEAP.  General concern over upland run-off, windfarms, HEP abstraction. Diversion of streams and introduction of outlet pipes from water turbines in upland rivers may cause flooding.	Tributaries are fully covered, the LEAP includes the whole catchment area.  Wind turbines have a negligible effect on surface water run-off. HEP turbines only discharge the same volume of water that they abstract. We are not aware of any current plans to divert streams for HEP abstraction. The Agency would always ensure any proposed HEP scheme would not have any detrimental impact on the environment. High flows in the Trannon were caused by extreme rainfall.
Mr Tony Bostock (AEG)	Issue 2 – How will the gauge at Dolwen affect flows at Bewdley?  Issue 4 – Is there any way Lottery or European funding could be used for construction of riparian buffer strips?  Issue 7 – Before undertaking works on increasing access to migratory fish, need to ensure the impact on resident species is fully assessed – design of fish passes must be carefully considered so less desirable species are not afforded access. Genetic integrity must be maintained. Investigate possible funding for salmon stocking from businesses.	The gauge at Dolwen will allow improved environmental control. Bewdley and Dolwen should compliment each other, to ensure flows are maintained in the upper reaches.  With reduction in budgets we may well have to seek Lottery or European funding for such work in the future.  All implications of fish passage are taken into consideration for each site. All fry stocked into the Severn system are produced from 'home' fish – brood stock from the Severn, Vymwy and Teme are used.



Comments received and the Agency's response

Consultee	Comments	Response / reference in Action Plan
<p>Mr Tony Bostock (AEG) (continued)</p>	<p>Issue 8 – Other problems (e.g. sheep dip, acidification, habitat degradation) could indirectly affect Brown Trout. Fully supports Brown Trout Strategy, genetic integrity of native stock should be maintained, however R&amp;D may prove there is no genetic difference in stocks in various catchments.</p> <p>Issue 9 – Surface water acidification is an extremely important issue. Partnerships should be sought to enable the liming of watercourses to continue. Specific projects requiring funding should be identified and funding applied for via Lottery/European/ Landfill tax allocations etc. Lobby MAFF for re-introduction of liming subsidy?</p> <p>Issues 16/17 – Supports the project to reduce agricultural, intensity in sensitive Severn-Vyrnwy area. Expressed concern over site at Haimwood (<i>refer to K Bateman's comments above</i>).</p> <p>Issue 18 – Suggested use of dye to make sheep dip solution more easily identifiable. Further actions suggested: liaise with manufacturers to encourage to development of methods to reduce toxicity of used sheep dip, encourage management practices to reduce the need to treat sheep against parasites, more far-reaching education programme, impact of sheep dip disposal on terrestrial fauna needs investigation.</p> <p>The landfill tax credit scheme has been poorly publicised to date. The profile could be raised via the LEAP.</p> <p>Concern over spray irrigation – promote winter storage more widely.</p> <p>Decline of crayfish – the Severn Uplands should be one of MAFF's 'no-go' areas for introduction of Signal Crayfish. Refer to the fact that it is an offence to allow crayfish to escape into the wild. Piscivorous Birds – concerned over impacts on fish – include recommendations of 3-year research project as an action in the LEAP.</p> <p>Conflict between different recreational</p>	<p>Noted.</p> <p>Support welcomed, we undertake genetic studies of brown trout populations.</p> <p>Support for this issue welcomed.</p> <p>More research is necessary to evaluate the benefits of liming before the Agency could press for lime subsidy re-introduction. The 'Forest and Water Guidelines' are now reinforced through the introduction of the 'Forestry Standard'.</p> <p>Support welcomed. Refer to comments above regarding site at Haimwood.</p> <p>Introduction of a dye could cause problems in dyeing wool of sheep, affecting market value. Treatment of surplus sheep dip and the other actions suggested are being actively pursued by the Agency in the recently published National Sheep Dip Strategy.</p> <p>Noted. See Section 2.8 in the Action Plan.</p> <p>We actively support the use of winter storage reservoirs. The Agency currently flow-restricts all licences so abstraction does not take place at times of low flow.</p> <p>The Agency will continue to eradicate Signal Crayfish. MAFF will not notify the area as a no-go area. See actions under Issue 5.3.</p> <p>The Agency is awaiting the outcome of an R&amp;D programme before reviewing its position on piscivorous birds.</p> <p>The Agency has duties and</p>

Comments received and the Agency's response

Consultee	Comments	Response / reference in Action Plan
Mr Tony Bostock (AEG) (continued)	<p>groups and impact on wildlife conservation. Need to investigate environmental impact of white water rafting proposals below Llyn Clywedog.</p> <p>Waste minimisation/recycling – appears at the end of the LEAP, give higher profile in Action Plan. Access to the open countryside.</p> <p>The Severn Uplands LEAP Public Seminar, held in Welshpool, was a great success.</p>	<p>responsibilities for both conservation and recreation. The Agency takes action where appropriate e.g. damage to spawning grounds. We would take possible environmental impacts into account in relation to discharges of water from the reservoir.</p> <p>Noted. The LEAP issues were ordered according to the 9 themes in our Environmental Strategy, but are not in any priority order. Access to the countryside is beyond the Agency's remit, although we have made our views known to government.</p> <p>Thank you.</p>
British Canoe Union West Midlands Region, Regional Access Officer	Issue 14 – Hoping to produce a web site to provide information on canoeing/ water levels/reservoir releases etc, possible pilot project on the River Vymwy. Agency permission/support needed for information.	A meeting was set up at our Solihull Office to discuss this and explain reservoir control models in more detail. The invitation was extended to other canoeists/groups.
British Canoe Union West Midlands Region, River Severn Adviser	Issue 14 -Use of Clywedog for white water rafting would affect canoeists' interests; request to be kept informed of developments.	The only involvement the Agency would have with this is in relation to releases of water from Clywedog Dam. Any rafting would have to make use of existing water discharge patterns.
British Waterways NW Region	<p>Recent restoration works along the northern section of the Montgomery Canal are being monitored for changes in biodiversity. A recent ecological survey has indicated virtually no change since 1987. The design of the canal works and long-term management proposal are actively reviewed by BW. Otters are present in the canal at Penarth and Wern.</p> <p>Suggested highlighting of problems with groundwater abstraction in the Abermule area.</p> <p>Amendments/additions suggested.</p>	<p>Comments noted and taken into account.</p> <p>The water company's application for groundwater abstraction has been withdrawn, therefore there is currently no problem with over-abstraction.</p> <p>See Appendix 2 in Action Plan, and Action Plan text, for amendments.</p>
The Coal Authority	No comments.	-
Country Landowners Association	Would be useful to have a meeting to discuss initiatives in the LEAP.	Joint meeting held with CLA, NFU (Wales) and FUW on 6 May 1999. This provided an opportunity to meet with

Comments received and the Agency's response

Consultee	Comments	Response / reference in Action Plan
<p>Country Landowners Association (continued)</p>	<p>Issue 2 – Reservations about statements in this issue (water resources) and use of Shropshire Groundwater Scheme. Reservations on policy on abstraction ceasing if flows drop below pre-determined levels. Supported need for increased public awareness of water resources/flooding issues.</p> <p>Issue 3 – The Agency should take stronger measures to encourage reduced demand on public supply. Concern that water resources in the Severn Uplands area are used as a national supply for areas of shortage in other parts of the country.</p> <p>Issue 4 – The LEAP is balanced against flood defence and agricultural production. Mention work of Internal Drainage Boards (IDBs).</p> <p>Issue 13 – Welcomed this section, there has been a growing problem with run-off from septic tanks and pollution caused by development. The LEAP should also address the problem of development/highway run-off (pollution, additional housing, run-off and flood risk).</p> <p>Issue 14 – How does the Agency propose to secure agreement from riparian owners for boating? CLA offers help in establishing permissive access (navigation/footpaths) where owners are prepared to co-operate.</p>	<p>Agency specialist staff to discuss the issues and a way forward.</p> <p>The Shropshire Groundwater Scheme was developed to meet environmental and water supply needs for the River Severn both in this area and beyond. The implementation of a cessation clause for new licences/variations from the River Severn is not expected to have a major impact on abstractors. Abstraction must cease once maximum releases have been reached at Clywedog - this is a very rare occurrence. Raised awareness (see new action 25.1 (a)).</p> <p>Discussed at meeting. The Agency is developing a more proactive approach towards water use minimisation. The area has plentiful supplies of water in comparison to SE England and other areas, and water is exported to meet public supply demand in other areas.</p> <p>Discussed at meeting. The Agency's commitment to flood defence is reflected in the level of expenditure indicated in the LEAP. We support the principle of agri-environment schemes, and recognise the current problems facing the agricultural sector with declining farm incomes, CAP reform and the need for adequate agri-environment subsidies. See amended action 4.4. The work of IDBs should have been referred to, see Action Plan section 2.11.</p> <p>Support welcomed. Local Plan policies are important in dealing with this issue, and with run-off from development in general. The Agency is currently promoting Sustainable Urban Drainage and encourages the creation of balancing areas where appropriate. Highway run-off is not known to be a particular problem in this LEAP area (also see Issue 20).</p> <p>This action (14.5) refers to the legal right of navigation, and not upstream of Pool Quay. If landowners were willing for canoeing etc to take place further upstream e.g. at Newtown, the Agency would be pleased to be involve in a partnership project.</p>

Comments received and the Agency's response

Consultee	Comments	Response / reference in Action Plan
<p>Country Landowners Association (continued)</p>	<p>Issue 15 – The CLA is a useful vehicle for promoting awareness of environmentally damaging impacts of unauthorised river works. There should be full consultation as to the best means of control and management</p> <p>Issue 16 – Concern at balance between the Agency's flood defence and biodiversity/conservation responsibilities. Welcome commitment to maintain argaes.</p> <p>Issue 18 – Welcomed Agency's educational approach to the threats of pollution through sheep dipping, offer to pass on information to members. Concerned over the way Groundwater Regulations were introduced and complex forms, and hope there will be a moratorium on prosecution for farmers who failed to fill in paperwork until rules have bedded down. Manufacturers should include neutralising agents with every dip purchased.</p> <p>Issue 20/21 – The CLA should be kept informed on effects of hill land improvement. Sensitive areas should be offered incentives in a package of practical measures. Proposal in Issue 21 not strictly a matter for the Agency (implies ESA management?).</p> <p>Issue 24 – Would the Agency consider setting up or sponsoring schemes through Landfill tax for environmental projects?</p> <p>Strongly urge that the Agency should become increasingly involved in LA and community partnerships to deal with illegal flytipping. Local depot needed in Welshpool and Newtown.</p> <p>The Environment Agency and predecessors has an exemplary record of</p>	<p>Thank you for the offer, CLA added to action 15.1, also suggest an article in a CLA newsletter. Noted and agreed.</p> <p>Discussed at meeting. The Agency's commitment to flood defence is reflected in the level of expenditure indicated in the LEAP.</p> <p>Discussed at meeting. Thank you for offer, added to action 18.3. Groundwater Regulations applications in before 31 March 1999 have the benefit of a deemed consent until the application is assessed. Guidance on any moratorium would have to come from Head Office. There is a helpdesk to assist with filling in the forms, provided the basic details are filled in, the Agency can assist with the rest. The question of neutralising agents is being looked at in the National Sheep Dip Strategy.</p> <p>Noted. There are no implied proposals for creating management schemes on hill areas. The issue asks questions/ investigates rather than making proposals.</p> <p>Discussed at meeting. Landfill operators can divert up to 20% of their landfill tax liability to environmental projects, which have to be approved by ENTRUST (see Section 2.8). Until recently the Agency was not able to contribute in this way because of potential conflicts of interest. However the Agency has received DETR approval for one such project as a third party funder, which opens up potential for us to support further such projects.</p> <p>The Agency will support local authorities wherever possible in increasing the provision of civic amenity and household waste disposal sites.</p> <p>Support appreciated, and comments noted.</p>

Comments received and the Agency's response

Consultee	Comments	Response / reference in Action Plan
Country Landowners Association (continued)	achieving its objectives through persuasion. Also trust the Agency will not be tempted in relation to biodiversity initiatives to assume the mantle more properly that of other agencies.	
The Countryside Agency	<p>Issue 6 - Integrating landscape and biodiversity issues with wide floodplain issues would broaden the approach.</p> <p>Issue 14 - Opposed to the increased use of the River Severn for navigational purposes</p> <p>Issue 16 &amp; 17- Pleased to see the Severn Vyrnwy Land Management Initiative in the LEAP, this is an important project with national implications. Welcome allocation of resources in the LEAP. Will continue to drive forward the initiative in partnership.</p> <p>Issue 21- Concerns over conversion of riverside land to arable use. Suggested actions to encourage traditional pastoral management along watercourses, and use farm visits, where appropriate, to promote agri-environment schemes.</p> <p>Suggested additional issue - Protection of the character and natural landscape features.</p> <p>Section 5.16 - Misleading statements on landscape and archaeology – needs correcting/re-visit landscape sections of the LEAP.</p>	<p>Noted.</p> <p>Noted.</p> <p>The Environment Agency supports this initiative and is a partner.</p> <p>Noted, although this issue is not directly concerned with localised land use immediately adjacent to a watercourse. Local management of agricultural land in an environmentally sensitive way is covered in Issues 4 and 15.</p> <p>Unfortunately the Agency is currently prioritising its conservation budget, in light of reduction in funding, for work on the ground rather than reports.</p> <p>Amendments made for Action Plan, although note this is a much shorter document and the detailed Consultation Report will not be reprinted. Also see Appendix 2 in Action Plan.</p>
Countryside Council for Wales	<p>Three LEAPs for the River Severn has limitations – suggested a 'Super LEAP' to be guided by a region-wide forum.</p> <p>Refer to Berwyn Special Protection Area and Special Area of Conservation.</p> <p>Issue 4 – Action 4.6 (signal crayfish) is better placed within Issue 5. Suggested investigating feasibility of eradication of signal crayfish from Mochdre Brook catchment.</p>	<p>This may have value for liaising over activities close to the river channel, but not for catchment-wide or diffuse issues. We are developing a Recreation Vision for the whole of the Severn. Management of water resources etc is in the context of the whole catchment of the Severn. A Regional Environment Action Plan (REAP) is being piloted. See Section 2.12.</p> <p>Conservation and biodiversity issues were discussed in detail at a meeting. 4.6 agreed, see revised action 5.3. New action 5.3 (b).</p>

Comments received and the Agency's response

Consultee	Comments	Response/reference in Action Plan
<p>Countryside Council for Wales (continued)</p>	<p>The Agency should undertake a review of maintenance regimes and impact on wildlife in the LEAP area.</p> <p>Suggested a river shingle audit be undertaken to quantify resource and record current condition.</p> <p>Issue 5 – Floating water plantain - suggested action – complete the survey of upland lakes in Montgomeryshire. White-clawed crayfish – the Agency could complete work carried out in Upper Severn catchment by UCW in 1998 – commission a survey on Afon Garno, Cerist, Trannon, Dulas and Clywedog.</p> <p>Issue 6 – Concerned that no resources have been set aside for control of invasive plants.</p> <p>Issue 17 – Concerned that identification of suitable borrow pits for argae works is not being undertaken in a strategic manner.</p> <p>Issue 22 – Concern over landspreading and term 'ecological improvement', appropriate measures should be taken to ensure SSSIs etc are not affected by landspreading operations.</p> <p>The Glossary did not include Special Areas of Conservation or Special Protection Areas.</p>	<p>This is already being done on a wider basis.</p> <p>New action 5.7.</p> <p>New action 5.4(b).</p> <p>New action 5.3(d).</p> <p>New action 6.4.</p> <p>This problem relates to contractual risks for the material borrowed. Concerns passed on to our Regional Engineering Services.</p> <p>We confirm that the Agency will take all practicable steps to ensure SSSIs and other wildlife habitats are not affected by landspreading activities.</p> <p>Now included in Glossary.</p>
<p>Drummond Outdoor</p>	<p>Issue 14 – Effort should be made when an opportunity arises to improve access for canoeing, especially where road crosses river. Clywedog and white water rafting – should be a close look at the impact on environment and local residents before the Agency becomes involved in any access agreement.</p>	<p>We will continue to explore possibilities for canoeing access, however due to limited financial resources it is unlikely we will be undertaking such work over the next 2 or 3 years. Clywedog and white water rafting - the only involvement the Agency would have with this is in relation to releases of water from Clywedog Dam. Any rafting would have to make use of existing water discharge patterns.</p>
<p>English Nature</p>	<p>Welcomed the Consultation Report. Three LEAPs for the River Severn has limitations – suggested a 'Super LEAP' to be guided by a region-wide forum.</p>	<p>A 'Super LEAP' may have value for liaising over activities close to the river channel, but not for catchment-wide or diffuse issues. We are developing a Recreation Vision for the whole of the Severn. A Regional Environment Action Plan (REAP) is being piloted for the East Midlands.</p>

Consultee	Comments	Response /reference in Action Plan
<p>English Nature (continued)</p>	<p>Issue 2 – Welcomed the intention for all new abstraction licences to include a clause which requires cessation of abstraction when flows fall below a pre-determined level - hope that in setting this level, full account is taken of water level requirement of the wetland resources. Export of water best considered within the context of a region-wide strategy.</p> <p>Issue 4 – Welcomed proposals for highlighting loss of biodiversity arising from agricultural improvements, recommend this is expressed in more detail. How will the LEAP engage the farming community to help bring about changes in farming practice required to protect and increase biodiversity? Montgomery Canal - hope that the Agency will be able to contribute to renewed discussions about the most appropriate form of canal restoration, mitigation and management to safeguard its high biodiversity interests.</p> <p>Issue 5 – Recommended actions for protection of rare and threatened species are expressed in terms of the contribution the LEAP will make towards meeting BAP special protection requirements and also Species Action Plan targets/objectives. Action needed for water vole conservation.</p> <p>Issue 6 – Specific action needed for invasive plants.</p> <p>Issue 14 – Proposals to develop fishing opportunities must be carried out with a full understanding of the ecological implications and in the context of an assessment of nature conservation constraints and potential enhancements for biodiversity.</p>	<p>Flow restrictions for the Severn catchment are based on the protection of the environment, and the protection of wetlands are taken into account. Management of water resources is considered in the context of the whole catchment of the Severn, each sub-catchment has a catchment management policy.</p> <p>Conservation and biodiversity issues were discussed in detail at a meeting with EN, CCW, MWT and SWT. Comments noted, amended action 4.4. The subject of agricultural practices and protection of biodiversity was also discussed at another meeting with the NFU, FUW and CLA (sic). We support the principle of agri-environment schemes, and recognise the current problems facing the agricultural sector with declining farm incomes and need for adequate agri-environment subsidies. The LEAP and annual review process will be used to highlight the subject. Montgomery Canal - noted, also see amended action 4.1</p> <p>Noted and discussed at meeting. A number of new/amended actions were agreed for this issue (actions 5.3, 5.4, 5.5, 5.7, 5.8). Suggested action for Water Vole – this was discussed but due to lack of available funding and prioritisation of other work there was a consensus that an action could not be included.</p> <p>New action 6.4.</p> <p>Noted/agreed.</p>
<p>English Sports Council- West Midlands</p>	<p>No comments.</p>	<p>-</p>
<p>Farmers Union of Wales</p>	<p>Support the use of partnership, although concerned on what effect the aims of the LEAP will have on agriculture, e.g. use of fertilisers/pesticides, shortfalls in</p>	<p>Joint meeting held with CLA, NFU (Wales) and FUW on 6 May 1999. This provided an opportunity to meet with Agency specialist staff to discuss the</p>

Comments received and the Agency's response

Consultee	Comments	Response/reference in Action Plan
Farmers Union of Wales (continued)	<p>income – financial compensation needed. Maintenance is now required for many pollution prevention installations that were installed when grant aid was available, re-introduction of grant aid for such works is essential. Supported need for increased public awareness of water resources/flooding issues. The imposition of Groundwater Regulations has not helped to promote the feeling of partnership/co-operation.</p> <p>Endorsed continued use of the argae system and development of a more effective flood warning system. Support review of River Severn regulation controls and reservoir operations.</p>	<p>issues and a way forward. Comments noted and discussed. The Area Environment Group could be used as a way forward to liaise more proactively with the farming sector. Raised awareness (see new action 25.1 (a)). Groundwater Regulations applications in before 31 March 1999 have the benefit of a deemed consent until the application is assessed. Guidance on any moratorium would have to come from Head Office. There is a helpdesk to assist with filling in the forms, provided the basic details are filled in, the Agency can assist with the rest.</p> <p>Support welcomed.</p>
Farming & Rural Conservation Agency - Cardiff	<p>An agricultural background paper was sent last year, pleased to see this incorporated in the LEAP. The impact of agricultural improvements on the land and influence of subsidies/agri-environment schemes – important not to over-simplify and raise expectations from possible reforms to subsidy systems. CAP reform and Agenda 2000 may lead to profound changes in the structure of the industry. Important to target those areas where most environmental benefit can be obtained.</p> <p>Issue 22 – Suggested change in issue title to 'Landspreading to dispose of waste products' (original misleading). More may need to be done to reduce heavy metal content/secondary treatment.</p> <p>Distinguish between agricultural improvements and agricultural practices.</p>	<p>The provision of this information was very useful. Comments noted and the implications appreciated. See amended action 4.4.</p> <p>The activity must be carried out with sufficient care to result in benefit to crops. The title has been changed to include the word 'benefit' rather than 'improvement'. Noted and agreed re heavy metal content. Severn Trent Water Ltd frequently monitor heavy metal content of their sludges.</p> <p>Noted.</p>
Farming and Rural Conservation Agency - Crewe	Comments incorporated in reply from MAFF.	Noted.
Federation of Shropshire Civic Societies – Mrs J Fidler	Would like to see Clywedog as part of a hydro-power scheme.	Clywedog has been used for hydropower since its construction, producing approximately 65 megawatts of electricity per day.



Comments received and the Agency's response

Consultee	Comments	Response/reference in Action Plan
Forestry Commission Severn, Wye and Avon Conservancy	Suggested amendments. Opening paragraph p. 94 is somewhat negative. Forestry is not 'development' as such, 'creation' may be a better word. Trees prevent pollution, not create it. Well designed and executed conifer plantations, using open space and broadleaves where appropriate, may well be appropriate for much of the Severn Uplands.	See Appendix 2 of Action Plan for amendments. Comments noted - see Section 2.4. Also noted for the next LEAP.
Gwynedd Council	No comments.	-
Inland Waterways Association  Head Office	<p>There should be a reference to Agency's responsibilities in relation to recreation in the aims (Section 1.1.1). No mention of navigation as a recreational activity in Section 2.4.</p> <p>Water Resources – include problem of excess water abstraction along the first 4 miles of the Montgomery Canal.</p> <p>Issue 4 – The Agency should be mentioned as a partner under 4.1 (review proposals etc. for restoration of Montgomery Canal). Concerned re Agency stance regarding restoration of the Canal, hope Agency can assist in development of improved mitigation and management processes etc.</p> <p>Issue 5 – Objected to wording in 5.4 which highlights the restoration of the Montgomery Canal as a constraint to increasing the population of floating water plantain – research suggests the species is reliant upon a certain level of disturbance.</p> <p>Issue 14 – General suggestions on wording of 1<sup>st</sup> paragraph, and suggested text regarding navigation, and footpaths along the Canal.</p> <p>The Montgomery Canal is a unique example of industrial archaeology, which cuts right across the Severn Uplands area, it has a very high heritage and educational value. The Agency appears, on balance, to be opposed to the restoration on environmental grounds, educational and heritage benefits not highlighted in the LEAP.</p>	<p>Noted, see Section 1.1 Action Plan. Reference to navigation is made in Issue 14 (recreation), also see Section 2.15 in Action Plan.</p> <p>The water company's application for groundwater abstraction has been withdrawn, therefore there is currently no problem with over-abstraction.</p> <p>Agreed. Noted, the Agency has a duty to protect and promote conservation but we recognise the economic, heritage, recreational and other benefits, see amended text 2.15, Issue 4 and 14.</p> <p>Noted.</p> <p>Noted, wording amended for Issues 4 and 14. Also see Appendix 2 in Action Plan.</p> <p>Agreed. See amended wording Section 2.13.</p> <p>The Agency has heard conflicting views regarding the restoration proposals and would like to see the detailed proposals. The balance has hopefully been redressed in the Action Plan.</p>

*Comments received and the Agency's response*

Consultee	Comments	Response / reference in Action Plan
<p>Inland Waterways Association</p> <p>Shrewsbury and Border Counties</p>	<p>Montgomery Canal - concern over the impression created by the LEAP that the canal is a serious threat to wildlife. Restoration will ensure preservation of archaeological assets, provision of recreation, navigation, angling, water quality improvement in some areas, and will provide a boost to the local economy. Would like to see a statement in the plan so that the Agency's intention to maintain and support a balanced approach can be made clear.</p>	<p>Comments noted, see revised text in Sections 2.15, Issues 4 and 14 in Action Plan. The Agency has heard conflicting views over the restoration proposals and would like to see current proposals. We support a balanced approach to the restoration.</p>
<p>The Institution of Civil Engineers</p>	<p>No comments.</p>	<p>-</p>
<p>Richard Lee RFERAC (Wales)</p>	<p>Issue 14 - Suggested strategic framework for recreation. Rights of way network needs to be underpinned in liaison with LAs e.g. Severn Way, Offa's Dyke path, Glyndwr's Way. Issues relating to provision of recreation should be given increased priority as society places a higher value on recreation experiences.</p>	<p>Comments noted. We are developing a 'Recreation Vision' for the River Severn. Action 14.5.</p>
<p>Melverley Internal Drainage Board</p>	<p>Issue 1 - Recommended the review of Clywedog releases be included in the LEAP, and an assurance that the operation of dam releases does not have a worsening effect on flooding in Severn-Vymwy confluence area.</p> <p>Issue 13 - Maesbury Marsh should be included for a comprehensive drainage study – the village badly needs a foul drainage system and improvements to the surface water system.</p> <p>Issue 16 – Support the concept of an agri-environmental scheme in the Severn Vymwy confluence – areas targeted should be the pockets of wetland already within the area. Any large-scale re-wetting proposals will require significant payments to farmers.</p> <p>Issue 17- Highlight the role of the Severn-Vymwy confluence area acting as a storage area in the event of a major flood, of benefit to places downstream.</p> <p>Issue 20 - Flood mapping is to be encouraged. Better recording and provision of flood information is important, e.g. flood markers.</p>	<p>Clywedog operating rules are being reviewed to ensure the river is being regulated in the most efficient way possible and in a manner that enhances the upper reaches of the River Severn. This will not worsen the tiny amount of flood protection provided.</p> <p>Welcome support on this issue. Note comments on Maesbury Marsh, action 13.2.</p> <p>Support welcomed and comments noted. The Countryside Agency will discuss this with you in more detail.</p> <p>Comments noted. Support for argae reconstruction programme and Flood Plain policy is welcomed.</p> <p>Comments noted. See actions under Issue 20.</p>

Comments received and the Agency's response

Consultee	Comments	Response / reference in Action Plan
Melverley Internal Drainage Board (continued)	Melverley IDB has an important role in ensuring land drainage is provided to a large relatively flat area of land which is agriculturally productive.	Agreed/noted. See Section 2.11.
Ministry of Agriculture, Fisheries & Food	Suggested amendments - NSAs/NVZs, Drinking Water Directive.	See Appendix 2 in Action Plan for amendments.
Montgomeryshire Wildlife Trust	<p>Issues should be evaluated in terms of 'ecological process management'. There is a need for the 3 Severn LEAPs to form one consistent guidance, possibly one document.</p> <p>Issue 4 – Requested the Agency be represented on the Montgomeryshire Canal Restoration Steering Group.</p> <p>Issue 5 – Would like the Agency to eradicate Signal crayfish from the Camlad and Mochdre Brook, and to take a lead in collating road kill information on otters.</p> <p>Issue 6 – Action must be taken/resources made available for control of invasive plants.</p> <p>Issue 17 – In the long term argae should be employed to encourage significant but controlled flooding, creating wildlife habitat whilst raising the capacity of the floodplain to buffer flood events.</p> <p>Issue 18 – Essential that Agency has direct access to information on sheep dip locations/identity of certificate owners.</p> <p>Issue 22 – Objected to the statement on landspreading of organic wastes from STWs/industries resulting in ecological improvement.</p>	<p>Conservation and biodiversity issues were discussed in detail at a meeting. See previous comments under Countryside Council for Wales.</p> <p>Comments noted/agreed, amended action 4.1.</p> <p>New action 5.3(b) for Mochdre Brook, request where the populations are in the Camlad. We currently pass information on road kills to the River Severn Otter Project.</p> <p>New action 6.4.</p> <p>Noted, but capacity of floodplain cannot be increased without detriment to those living and working in the area.</p> <p>The responses by applicants for authorisations under the Groundwater Regulations will enable us to target resources more efficiently.</p> <p>Farmland is the main outlet disposal for spreading of sewage sludge, which is in accordance with the law provided the activity does not cause pollution and agricultural benefit can be demonstrated.</p>
Montgomery Waterway Restoration Trust	The LEAP is inconsistent in its approach to the restoration of the Montgomery Canal. It does not refer to the long-standing commitment of all parties to include nature conservation in the restoration programme etc. Offered proposed new policy statements.	The thrust of the proposed new statement is incorporated within the Action Plan. See Sections 2.15, 3.2, Issues 4 and 14. (Note the Consultation Report is not being re-published; the Action Plan is a much shorter document). We do recognise the efforts that have been made to protect biodiversity in the Canal, but we must also take into account concerns raised by conservation organisations.

*Comments received and the Agency's response*

Consultee	Comments	Response/Reference in Action Plan
<p>Montgomery Waterway Restoration Trust (continued)</p>	<p>Issue 4 – This issue did not mention that the recent restoration of the first 5 miles of the canal has led to the creation of 3 large nature reserves.</p> <p>Issue 5 – The Agency's commitment to join in the task of safeguarding floating water plantain is welcomed.</p> <p>Issue 6 - It is difficult to know why the canal is considered a 'damaged habitat' and included under Issue 6. The policy of the restoration partnership is to maintain biodiversity for the Montgomery Canal.</p> <p>Issue 14 – The Montgomery Canal is a leading resource for the benefit of the borderlands, both for recreation and economic regeneration. No reference is made to improved access afforded by restoration of the Canal or creation of new recreational opportunities.</p> <p>The Montgomery Canal is not mentioned under 5.16 (Landscape) or 5.17 (Fisheries).</p>	<p>Added to Issue 4 in Action Plan under 'Montgomery Canal'.</p> <p>Noted, action 5.4(a).</p> <p>Action 6.7 under 'Restoration of damaged habitats' has been incorporated within action 4.1 'Loss of Biodiversity'</p> <p>Amended for Issue 14 in Action Plan, also Section 2.15.</p> <p>Landscape: see Section 2.13 of the Action Plan. The Montgomery Canal, and its designation as an EC designated fishery, was referred to in the Consultation Report in Section 5.17 under the heading 'Coarse Fish' on page 144, and 2.14 Action Plan.</p>
<p>Mr D H Morgan</p>	<p>Issue 4.6 and 5.3 – Add 'prevent re-infestation by Signal Crayfish of areas from which they have been cleared'.</p> <p>Issue 5 – Suggested investigation into means of eradicating Mink to save voles and sand martins.</p> <p>Issue 6 – Suggested distribution of brochures to anglers/the public identifying invasive weeds (and distinguishing between Signal and Native Crayfish).</p> <p>Suggested new action – promote legislation to enforce the sale and purchase of neutralising agents with pesticides</p>	<p>Every effort is being made to eradicate Signal Crayfish from the Vyrnwy catchment. See actions under 5.3.</p> <p>The Agency would not get involved in eradicating mink as it is an impossible task, the message must be to prevent further introduction of alien species.</p> <p>Thank you for the suggestion, we have already produced some leaflets.</p> <p>The Agency is continuing to exert pressure on sheep dip manufacturers to provide neutralising systems for residual solutions - this is an action in the new National Sheep Dip Strategy.</p>
<p>S &amp; N Morley</p>	<p>Issue 2 – Llyn Clywedog – local understanding has been that it was built for flood prevention purposes. Concern over conflicts of interest – water</p>	<p>It is a 'fringe' benefit of Clywedog that minimal flood storage may be provided during winter months. Severn Trent Water Ltd operates the dam in</p>

Comments received and the Agency's response

Consultee	Comments	Response / reference in Action Plan
<p>S &amp; N Morley (continued)</p>	<p>company/public body.</p> <p>Issue 17 – Pleased that the Agency is not considering abandoning the argae system, aware of extensive number of places where overtopping occurred in October 1998 floods.</p> <p>Issue 19- Doubts about the flood warning system will persist, as it is sometimes very unclear as to the roles of different agencies in an emergency. No warnings were received on 28 February and 1 March. 'Over 30 years since a major flood occurred' will need revising in light of October 1998 event.</p> <p>Issue 20- Concern over developments at Welshpool and impacts on run-off/ flooding. Opposed to go cart track development at Haimwood shooting ground, Llandrinio.</p>	<p>conjunction with guidance provided by the Agency.</p> <p>Noted.</p> <p>A total of 12 flood warning calls should have been received during this period. Agreed, the Consultation Report was already at the printers when the October 1998 floods occurred.</p> <p>Local Authority Development Plan policies include measures to mitigate the effect of development on watercourses. Comments on the Haimwood development were taken into account in our reply to the planning consultation.</p>
<p>National Farmers Union, Wales</p>	<p>The NFU supports the need to protect and enhance the whole environment, but wish to stress the importance of the Environment Agency working with all concerned in a partnership approach. Regulation and legislation should be regarded as a last resort for achieving environmental objectives. The continuing decline in farm incomes will lead to a break up of rural communities, their economies and potentially the environment.</p> <p>Issue 1 – The Agency should adopt a more proactive role in terms of its management of Clywedog and Vymwy in order to alleviate flooding. Regulation of the River Severn has not been 'sold' effectively to those affected – farmers, landowners, public.</p> <p>Issue 4 – As farm incomes decline, there is greater pressure on farmers to increase output or efficiency, and farm businesses no longer possess the financial resources to undertake environmental improvements.</p> <p>Issue 9 – Potential consequences of declining farm incomes- reduction in</p>	<p>Support welcomed, and concur with the partnership approach, which is embodied in the LEAP. Joint meeting held with CLA, NFU, and FUW on 6 May 1999. This provided an opportunity to meet with Agency specialist staff to discuss the issues and a way forward.</p> <p>Discussed in detail at meeting. Production of video suggested (see new action 25.1 (a)), press statement, use Area Environment Group to liaise more proactively with farming/land-owning community, open day.</p> <p>Noted, discussed at meeting. The Agency will support the Government and other agencies to influence the CAP reform process to ensure adequate funding of rural and environmental measures. See revised action 4.4, Section 3.2, 2.3.</p> <p>See actions under Issue 9. Effectiveness of liming as a potential short-term</p>

*Comments received and the Agency's response*

Consultee	Comments	Response / reference in Action Plan
<p>National Farmers Union, Wales (continued)</p>	<p>application of lime to land etc. (incentives/assistance required for such management practices).</p> <p>Issue 15 – The NFU (Wales) is happy to assist in promoting increased awareness of potential environmental consequences of unauthorised river works.</p> <p>Issue 18 – The regulatory approach to sheep dip pollution is inappropriate/last resort. Provision of advice and information/partnership is a more positive approach. Press for research into neutralising compounds.</p> <p>Issue 21 – The NFU would oppose any attempts to introduce regulatory controls or limitations on land improvements (run off/hill land improvements)</p> <p>Issue 24 – Illegal deposit of waste is of major concern to the NFU. Welcome measures to increase publicity of need for public to dispose of waste legally and to promote household collection services.</p>	<p>solution to surface water acidification - research would be needed to justify further Agency support.</p> <p>Noted, thank you. Action 15.1.</p> <p>The unregulated approach, unfortunately, does not appear to be working. Prosecution is normally reserved as a last resort, when our preferred method of giving advice and information has failed. The Agency is pursuing research into these compounds in the recently published National Sheep Dip Strategy</p> <p>We are still at the stage of trying to establish if there is a problem in respect of the impact of land use changes on run-off.</p> <p>Noted, see actions under Issue 24.</p>
<p>North West Water Ltd</p>	<p>Issues 1 and 2 – Welcome the opportunity to discuss the issues raised in their Water Resources Plan and in the LEAP. Vyrnwy is a key strategic water source for North West Water Ltd. Full availability of the deployable output of Vyrnwy is assumed (allowing for the current water bank provisions).</p> <p>Issue 3 – NWW is also working to ensure peak demands can be reliably met.</p> <p>Issue 21 – Impacts of land use on run-off, this initiative complements their work in water supply catchments. Keen to see best practice in forestry management on Vyrnwy catchment.</p>	<p>Comments noted with thanks. These matters can be further discussed at strategic planning meetings at our Regional Office.</p> <p>Noted, we appreciate you are also working to meet peak demands.</p> <p>Comments noted. The Agency is keen to promote best practice in forestry management.</p>
<p>Oswestry Borough Council</p>	<p>Committee report enclosed. The Council supports the aims stated in the Consultation Report and working in partnership with the Environment Agency.</p> <p>Issue 5 - There are significant</p>	<p>Support and copy of Committee report welcomed.</p> <p>The Agency is undertaking surveys for</p>

*Comments received and the Agency's response*

Consultee	Comments	Response/reference in Action Plan
<p>Oswestry Borough Council (continued)</p>	<p>populations of Great Crested Newts in the Borough, their habitats are protected and integrated into new development areas by the planning system.</p> <p>Issue 10/12 - Concern over reduction of dilution of sewage effluent from Mile Oak Works. Support aims of Agency for funding under AMPs to carry out improvements.</p> <p>Issue 13 – The Council pursues remedial action regarding defective septic tank soakaways on an individual basis or to secure mains drainage and treatment.</p> <p>Issues 16/17/19/20 – The Council should heed the advice of the Agency as far as possible in applying its development policies on the flood plain. It would be premature and counter-productive to consider disbanding the volunteer flood warden system.</p> <p>Issue 23 - As a joint initiative by the Borough, County and district councils in Shropshire is presently being developed, which will set the scene for Shropshire New Waste Strategy, the Environment Agency should seek a partnership with LAs in this process. Supports proposals to promote waste minimisation.</p> <p>Issue 24 - Will continue to work with the Agency on monitoring fly tipping and the pursuit, identification and prosecution of offenders. Will continue to work with Agency on contaminated land issues where they threaten public health. There are 22 Part B processes for which the Borough Council is the enforcing authority. Will continue to work closely with the Agency over emergency responses to pollution incidents, and to achieve targets set by the National Air Quality Strategy.</p> <p>Issue 25 - Will continue to support and work with the Agency whenever possible. One example is through LA21.</p> <p>Welcome reference to policies of Local Plan. These have since been modified.</p>	<p>Great Crested Newts this year. Suggested contacting our Conservation Officer with details. See action 5.4.</p> <p>It is essential development does not precede improvement at Mile Oak WRW.</p> <p>The Agency welcomes remedial action on an individual basis or where possible under S101A Water Industry Act 1991 to secure mains drainage and treatment.</p> <p>This is welcomed.</p> <p>We are in the process of consultation over flood warning, and will take the views of LAs and recipients into account.</p> <p>Noted, see action 23.2.</p> <p>Support welcomed.</p> <p>Support and partnership work welcomed.</p> <p>Support welcomed.</p> <p>See Appendix 2 of Action Plan for amendments.</p>
<p>Oswestry Town Council</p>	<p>No comments.</p>	<p>-</p>
<p>Powys County Council</p>	<p>The public seminar in Welshpool was a</p>	<p>Noted with thanks.</p>

Comments received and the Agency's response

Consultee	Comments	Response / reference in Action Plan
<p>Powys County Council (continued)</p>	<p>welcome opportunity to hear more about the work of the Environment Agency. Committee Report enclosed.</p> <p>Section 2.2 – the first phase of an air quality review has been set up in Powys.</p> <p>Climate change – although no local issues have been identified, increasing pressure to generate energy from renewable sources could lead to further proposals for HEP schemes. These together with changes in flooding, also relate to climate change and could have local impacts.</p> <p>Issue 4 – The positive benefits of windfarms and HEP schemes are not mentioned. Reference should be made to the off-line compensatory nature reserves established for the Montgomery Canal.</p> <p>Issue 5 – Black Poplars - Powys CC operates a scheme which supplies free black poplars and guards.</p> <p>Issue 6 – Move action 6.7 (biodiversity of Montgomery Canal) to Issue 4?</p> <p>Issue 13 – Montgomeryshire Local Plan already contains policies to prevent foul drainage problems in critical areas, reference should be made to the impending UDP.</p> <p>Issue 14 – Scope for collaborative projects with LAs to increase access opportunities (footpaths/cycleways alongside watercourses) -add as an action.</p> <p>Issue 16 – Need for further consultations on the Environmental Strategy for the Severn-Vyrnwy confluence with Powys CC and Community Councils.</p> <p>Issue 20- Up to date and comprehensive information on the extent of floodplain would be of great value in the UDP process. Policies relating to removal of redundant buildings obstructing floodplain, and caravan sites in floodplain can be discussed as part of the UDP process.</p>	<p>Thank you for the update, see Section 2.7 in Action Plan.</p> <p>Comments noted and acknowledged, although there is reference to these matters elsewhere in the plan. A complex subject.</p> <p>This was referred to in the section on renewable energy (5.7). Added to Issue 4 in Action Plan under 'Montgomery Canal'.</p> <p>This is very welcome.</p> <p>Agreed, now included in action 4.1.</p> <p>Noted.</p> <p>Agreed. There is currently limited funding available, but we will look for/consider opportunities as they arise. See footnote, Issue 14.</p> <p>Noted. Contact the Countryside Agency for an update.</p> <p>Noted, see actions under Issue 20 regarding the modelling and mapping programme.</p>



Comments received and the Agency's response

Consultee	Comments	Response/reference in Action Plan
Powys County Council (continued)	<p>Issue 21 – The planning process cannot control changes in relation to forestry.</p> <p>Land Use Statements – discussions should take place as part of the consultation exercise for the UDP.</p> <p>Local Plan information – various updates.</p>	<p>This is recognised, although it is hoped that any forestry initiatives the LA is involved in will take account of any impacts which may affect run-off rates.</p> <p>The Agency welcomes the opportunity to discuss these and the forthcoming UDP.</p> <p>See Appendix 2 in Action Plan for amendments.</p>
Powysland Internal Drainage Board	<p>The LEAP was too environmentally based, with flood defence tending to take second place.</p> <p>No mention of the importance of the work of Internal Drainage Boards.</p> <p>The Agency should be in a position to insist that any new development in the catchment area should control its storm water run-off by use of balancing pools or hydro-breaks.</p> <p>Issue 1 - No mention of current operating rules for River Severn resource/supply system which sets out controls of the Clywedog and Vyrnwy dams and utilisation as a flood control measure.</p>	<p>Issues 15-17 and 19-21 cover a wide range of flood defence concerns, with supporting information and maps in Section 5.1.4. The Agency's commitment to flood defence is reflected in the level of expenditure indicated in the LEAP.</p> <p>Apologies for this omission. Map 20 showed IDB areas. See Section 2.11 in the Action Plan.</p> <p>Refer to SU/LU6 on page 65 of the Consultation Report, which refers to the fact that development must not exacerbate flooding elsewhere due to increased rates of run-off.</p> <p>Clywedog was built for river regulation purposes and Vyrnwy for water supply. We operate a strict drawdown curve and there is a very limited amount of flood storage available.</p>
Mr N Roberts	<p>As the Severn Uplands area enjoys very good air quality its pollution profile may be an acceptable baseline for the UK. Noted cases of slope collapse in the area of Van disused lead mines.</p> <p>Simple to use test papers would be welcome to check quality of drinking water in case of contamination by sheep dip.</p> <p>Water resources – poor flush power can result in blocked drains. Suggested levy on water suppliers to stop leaks.</p>	<p>Comments noted. Central government and Local Authorities undertake monitoring of air quality and decide on locations for monitoring stations. Contact Powys CC regarding slopes at Van.</p> <p>Given the low level of pesticides concerned and the complex chemistry of the compounds, the development of a simple test would not be feasible. Concerns regarding drinking water should be directed to the relevant water company (mains water) or the Environmental Health department of the local authority if a private source.</p> <p>Noted. we are aware of the reduced low flush issue. A levy on suppliers is already indirectly set by OFWAT. The</p>

Comments received and the Agency's response

Consultee	Comments	Response / reference in Action Plan
		Agency is committed to raising awareness and encouraging wise and efficient use of water.
Royal Commission on Ancient & Historical Monuments of Wales	<p>Reference should be made to Welsh Office circular 61/96 - <i>Planning and the Historic Environment: historic buildings and conservation areas</i>, which contains the requirements to inform RCAHMW for recording purposes.</p> <p>As well as information contained in the local Sites and Monuments Record, there is information in the National Monuments Record. RCAHMW or the appropriate archaeological trust should be alerted of any discoveries made as a result of work carried out by the Agency.</p>	Comments noted. Also see Appendix 2 of Action Plan.
Royal Society for the Protection of Birds – Wales	<p>Issue 4 – Action 4.2 – beneficial for Barn Owl.</p> <p>Issue 5 – Higher profile should be given to Lapwing. Suggested action to support habitat creation on important lapwing sites in West Shropshire. Suggested new action – set targets for further priority bird species and habitats. Also refer to other UK BAP species.</p> <p>Issue 6 – The RSPB will provide advice on wetland habitat creation for priority breeding waders such as lapwing and snipe.</p> <p>Issue 14 – Supports measures to ensure recreational uses of rivers do not conflict with their conservation importance.</p> <p>Issue 16 – Supports the Countryside Agency led land use project for the Severn-Vymwy confluence area, will be offering advisory expertise on habitat creation.</p> <p>Issue 17 – Extraction of spoil offers opportunities to design specific wetland habitats targeted at breeding waders etc – RSPB can advise.</p> <p>The LEAP does not identify what actions the Agency could take for supporting breeding waders. Greater reference should be made to the presence of important riverine species such as dipper, grey wagtail, kingfisher.</p>	<p>Noted.</p> <p>New action 5.8. We will also continue to support nature reserves created in partnership along the Severn valley, which should be beneficial for Lapwing. Noted, although with its limited resources the Agency will concentrate on bird species for which it is the lead.</p> <p>Thank you for the offer of advice.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. Amended wording Issue 17, thank you for offer of advice.</p> <p>Your views on how to take forward possible actions for breeding waders would be appreciated. Comments noted, referred to in Section 2.12 of Action Plan.</p>

*Comments received and the Agency's response*

Consultee	Comments	Response / reference in Action Plan
Severn Navigation Restoration Trust (I Walker & Associates on behalf of)	Seek confirmation that the actions will form part of a full, integrated review for regulation/management of water resources. Support the action outlined in 14.5 (recreational use of the Severn) and seek further involvement in its progression.	Proposed actions for water resources are considered as an integrated part of the overall management for the whole of the Severn catchment. We will be seeking and taking into account the views of SNRT when formulating our recreation Vision for the River Severn.
Severn Trent Water Ltd	<p>Supportive of the aims of the LEAP programme. Concerned that in LEAPs the Agency takes account of national policies such as those as expressed in Asset Management Plans (AMPs). The protection of the catchment's water supply is of major importance.</p> <p>Support the principle of the proposed review of the River Severn Control rules. Scope for making better use of resources to reduce likelihood of drought orders being required etc. Review should recognise importance of maintaining public supplies.</p> <p>The scope of the water resources to be considered should include Shropshire Groundwater Scheme and potential new resources as well as Lake Vyrnwy and Llyn Clywedog. Feasibility studies should be undertaken during AMP3 to address potential issues.</p> <p>Severn Trent Water's Biodiversity Action Plan is due to be published July 1999.</p> <p>Important that metal pollution from diffuse sources is addressed in parallel with any action required at point discharges to secure compliance with RQOs. Further consent tightening at Oswestry Mile Oak STW is planned for AMP3.</p> <p>Works listed in Issue 11 are included in the currently proposed AMP3 programme, with the exception of Church Stoke, which is within AMP2. Recognise need to secure compliance with EU Directives, but concerned about the proposal to review OP limits on the consent for Newtown STW as data appears to suggest that levels in effluent are less than the limit of detection.</p> <p>Severn Trent Water has established</p>	<p>Support welcomed. LEAPs take account of national policies such as the Water Companies' AMPs.</p> <p>Comments on the River Severn Control rules noted. The review will be carried out in consultation with the water companies concerned.</p> <p>Comments on the strategic role of water resources (Issue 2) noted, the review will consider Lake Vyrnwy, Llyn Clywedog as well as the Shropshire Groundwater Scheme.</p> <p>Noted.</p> <p>Comments noted.</p> <p>We agree that Church Stoke STW should be included as an action under AMP2, see action 11.3.</p> <p>Severn Trent Water Ltd will be kept fully informed of the Agency's investigations into the proposal to review the OP pesticides limit on the consent for Newtown STW.</p> <p>Noted.</p>

Comments received and the Agency's response

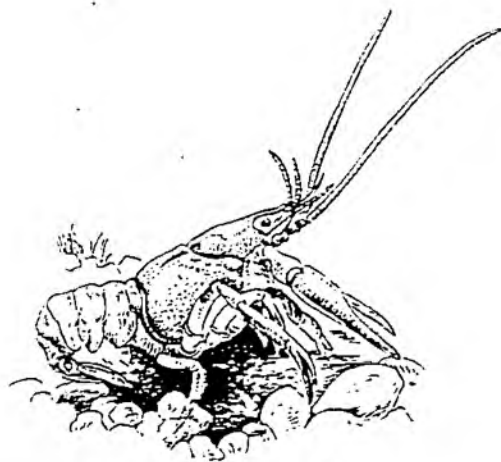
Consultee	Comments	Response/reference in Action Plan
Severn Trent Water Ltd (continued)	<p>procedures for assessing sewerage connections made under S101A of the Water Industry Act and has accepted a significant number of applications.</p> <p>The recycling of sludge to land is already a highly regulated process. In most cases, concentrations of heavy metals in sewage sludge have significantly reduced from their historical levels, further improvements to the quality of sludge for recycling are likely in future. Re-use of such sludge is recognised as being beneficial.</p> <p>Title of photo (p.60), pond dipping at Newtown sewage reservoir, is not appropriate.</p> <p>Most of the issues can be progressed through current liaison arrangements.</p>	<p>Comments noted.</p> <p>Noted, thank you for pointing this out.</p> <p>Regular meetings take place between the Agency and Severn Trent Water Ltd.</p>
Mr D Sharp	The Agency must continue to maintain flood defences, press others to maintain their waterways, support transport improvements and only object to planning applications when there is proven danger to water issues.	The Agency advises Local Planning Authorities on development affected by flooding. This is to ensure that development is not affected by flooding, flooding on other land is not exacerbated, and the workload on emergency services is not increased.
Shropshire County Council	<p>The Planning sub-committee generally welcomed the LEAP. Raised concern at damage done to river habitats by cutting back vegetation and dredging.</p> <p>Are communities, at the Parish Council level, targeted in the LEAP process?</p>	<p>Because of its commitment to biodiversity, the Agency rarely undertakes desilting works. However, tree maintenance is undertaken to prevent trees falling into the river, this tree work generally reduces the risk of flooding and helps maintain biodiversity.</p> <p>The Agency undertakes wide consultation for LEAPs, including Parish Councils. Local communities are targeted as far as practicable with summary booklets, leaflets, library displays, press releases etc.</p>
Shropshire Regeneration Partnership	<p><i>(See Oswestry BC letter for issues, joint letter with additional comments below).</i></p> <p>Welcomed the report and its holistic partnership approach. The future impact of likely changes in agricultural regimes and practices has been given insufficient consideration, although the plan does offer support for Severn-Vyrnwy initiative. Some concern is expressed about the impact upon biodiversity of the Montgomery Canal restoration –</p>	<p>Support welcomed.</p> <p>Comments noted. The LEAP consultation has helped increase our understanding of these issues. Many of the agriculture-related issues have been discussed with other organisations, and a meeting was held with the NFU, FUW and CLA.</p> <p>Comments noted.</p>

Comments received and the Agency's response

Consultee	Comments	Response/reference in Action Plan
Shropshire Regeneration Partnership (continued)	need for close liaison with all parties. The Agency needs to develop further links with LAs with regards to emergency planning, by communicating further, having open days, and attending meetings.	Comments on emergency planning have been passed on to the appropriate departmental managers, and we look forward to these links being furthered.
Shropshire Wildlife Trust	<p>Welcomed the fact that the biodiversity issue is addressed so directly, and the commitment to funding. Look forward to further developing joint projects.</p> <p>Issues 16/17 – The Agency has potential fundamental conflicts of interest in the Severn Vyrnwy-confluence area. Borrow-pits could be used to off-set some of the environmental impacts of argae work.</p> <p>Issues 4/14 – Restoration of the Montgomery Canal- the Agency has a role in ensuring that net biodiversity is not eroded by a scheme that fails to maintain biodiversity.</p> <p>Applauded the excellent nature conservation work carried out by the Agency in the past, in co-operation with other agencies, but concerned that funds for such work are being reduced.</p>	<p>Support welcomed.</p> <p>The Agency tries to maximise habitat creation through the creation of borrow pits, and will continue to promote this concept.</p> <p>Comments noted. See revised action 4.1.</p> <p>Concerns on the future of funding are noted. As the demands on limited funding continue to increase, it is vital that the momentum of environmental improvement is kept going through collaborative partnerships.</p>
South Shropshire District Council	In general the Planning Committee supported the report. It provided a very clear and comprehensive approach towards management of land, air and water. The LEAP applies to only a small area of South Shropshire (3% of LEAP area). The issues of most relevance to the LPA are: loss of biodiversity, sewerage and sewage disposal in rural areas, floodplain management.	Comments noted, support welcomed.
Sports Council for Wales	No comments.	-
Mr J Turner	General concerns over flooding, neglected riversides/canals, litter, access/footpaths.	Comments noted and passed on to appropriate officers. The LEAP will address some of these issues. British Waterways are responsible for maintenance of canals.
Welsh Canoeing Association	Issue 14 – The WCA would look to broker agreements for canoeing access, in consultation with landowners, angling clubs and others, on the Vyrnwy, Tanat, Banwy and Severn above Pool Quay. Agreement hoped for Clywedog during 1999. The area offers considerable	Comments noted.

*Comments received and the Agency's response*

Consultee	Comments	Response / reference in Action Plan
Welsh Office	Suggested amendments.	See Appendix 2 in Action Plan.
Welsh Office Highways Directorate	Referred to programme of trunk road schemes, specifically A458 Buttington Cross to Middletown, which crosses the floodplain of the Severn. Copy of 'Driving Wales Forward' document enclosed.	Comments and document noted with thanks. We are aware of the proposed scheme.
White Swan Piscatorials	<p>Issue 5 – Suggested an action to investigate removal of mink.</p> <p>Issue 6 – Source funds from the EU to purchase upland areas to create/improve wetlands.</p> <p>Discussions should be held with the Government to enforce purchase of neutralising agents for use with pesticides.</p>	<p>We agree about the impact of mink, particularly on water voles, but feel it is impossible to eradicate mink. We promote the message that non-native species should not be introduced.</p> <p>The Agency is primarily a regulatory body and would not be able to source funds to purchase large areas of land. However, we have a programme of wetland improvements (e.g. Severn Valley Wetlands Strategy) that we carry out in partnership with others.</p> <p>The Agency is continuing to exert pressure on sheep dip manufacturers to provide treatments for residual sheep dip solution, this is an action in the Agency's National Sheep Dip Strategy.</p>



*White-clawed Crayfish*

Table 2 Summary of comments received from questionnaires in the summary booklet

Name	Comments	Response/reference in Action Plan
Anonymous x 10	No additional comments	-
Anonymous	Greater access to waterways where appropriate so the public can spot and report harmful activities. Particular attention to retaining naturalness of headwaters. Concern over gravel removal and unauthorised river works, farm pollution and disposal of dead sheep.	Comments noted. We welcome any reports of harmful activities and pollution incidents on our 24 hour emergency hotline 0800 80 70 60. These concerns are covered in the LEAP under Issues 4, 6, 14, 18, 21, 24 and 25.
Anonymous	Stop building on floodplain.	Agreed, thank you for your support – see Issue 20.
Anonymous	Flood prevention should be a main aim.	Providing effective flood defence and flood warning to protect people and property from flooding is one of the Agency's key aims. See Section 1.1 and Issues 19 and 20.
Anonymous	Investigate drainage and run-off rates in upland areas, advise that no new building takes place on floodplains.	Agreed, included in the LEAP – see Issues 21 and 20.
Anonymous	Include recycling of waste in the LEAP.	This is included under Issue 23, sustainable waste management.
Anonymous	More publicity to enhance public awareness.	Noted. Articles and public notices were in local papers, the LEAP was publicised on Radio Shropshire, posters issued, displays held in libraries, and the LEAP was placed on the internet. We try to publicise LEAPs as far as resources will allow.
Anonymous	Greater publicity in local newspapers and on local radio and television.	As above.
Anonymous	A comprehensive leaflet. Maintaining and enhancing the Uplands will require a firm approach – good luck.	Comments noted, thank you.
Mr J Audrey	Advice to farms and industry is not enough. Pollution run-off should be stopped. There should be greater domestic waste recycling. Limit house building in high water table areas. Need for more argaes to contain excess water for short term in flood plain. Suggested mini dams on feeder rivers to steady flow into River Severn.	Comments noted. The LEAP contains actions to address a number of these concerns.
T J Bidwell	No additional comments.	-
Mrs P Blaxland	Safeguard households at risk of flooding and improve flood prevention measures and early warning system.	Comments noted.
Mr A Bostock (AEG)	Also enclosed letter.	See Table 1.

*Comments received and the Agency's response*

Name	Comments	Response / reference in Action Plan
W G Close	Worked on the Clywedog scheme. The document records an enormous advance.	Noted with thanks.
Mr B Creaven	Would like to see a project to re-stock rivers with young trout/salmon parr. Fishing groups could become involved in this project to help with cost and identifying suitable sites. Land drainage is a major concern.	The Agency has been stocking rivers in catchment with young salmon for at least 10 years, averaging 100,000-250,000 per year. Current developments include rearing brown trout on a river-specific basis to support only natural stocks under threat. There may be a possibility for partnerships with fishery owners/ angling clubs.
Mr D R Dabinett	Stop decline in numbers of native oak tree in the area. Promote oak tree planting in upland areas. Suggested an easy-to-read informative annual newspaper delivered to each household – knowledge through education is the way forward for environmental issues.	The Agency supports your views on the impact on biodiversity from loss of oak trees and will continue to plant oak trees in addition to black poplar at every opportunity. We agree on the importance of environmental education, and are working to promote this (see Issue 25). Idea for newspaper has been passed on.
Mr N A Dodd	Would like to see better control/ management of flood defences and reservoir discharge/river flow.	Comments noted. This is considered in Issues 1, 19 and 20.
Mr P Edge	No additional comments.	-
Mr D Evason	The Consultation Report seems a very comprehensive document.	-
Mr R Goodhew	<p>Is the proposed agri-environment scheme enough to achieve restored, biodiverse wetlands in the Severn-Vymwy confluence?</p> <p>Is the policy of managed retreat ruled out by knock-on impact on urban flooding downstream?</p> <p>Flood warning - need for specific warnings to improve on the colour coded system.</p>	<p>Yes, provided the payments are sufficiently large to attract dairy farmers. To date payments are at too low a level.</p> <p>The policy of managed retreat is ruled out by the knock-on impact on urban flooding locally and downstream.</p> <p>All are currently under review.</p>
Mr H Jones	Flood warning – continue to improve the good service now in place. Would urge the Agency to implement river level management to its best, even to using the confluence area to record river levels when releasing water from Clywedog and Vymwy reservoirs. There should be more involvement by farmers in producing the report.	<p>Comments noted. See actions under Issues 19 and 1.</p> <p>We consulted farming organisations before producing the Consultation Report, and held meetings with farmers' representatives after the LEAP was published. Farmers also came to the public seminar held in Welshpool.</p>
Mr R Lambie (Laura Ashley)	Would like to see energy production at dams etc.	Noted, energy production is not within the Agency's remit. There is some use of Clywedog for hydropower.



*Comments received and the Agency's response*

Name	Comments	Response / reference in Action Plan
Mr R Lewis	Prior to post-war forestation, the River Twrch was not, as it is now, a spate river. The spates cause erosion and reduce the fish population. It is not just floods that result from rapid run-off (Issue 21).	Comments noted and information on River Twrch appreciated.
Mr & Mrs J Markwick	Would like to see a more balanced attitude towards flood defence, which affects people, property and main roads in the area.	Issues 15-17 and 19-21 cover a wide range of flood defence concerns, with supporting information and maps in Section 5.1.4.
A J McCowen	No additional comments.	-
Mr P Morgan	Concerned at the state of some tributaries of the River Tanat (grey sludge/growth and lifeless), particularly River Llieriog.	Comments noted. Passed on to the appropriate Environmental Protection Officer for investigation.
J Mussen	Comments and suggestions made on display boards and summary booklet.	Comments and suggestions noted, thank you.
Mr D Nisbet	<p>Commented on development pressures and how to achieve a balance.</p> <p>Commented on safeguarding the landscape.</p> <p>Queried results from monitoring the Montgomery Canal. Consider the ecological effects of some recreational facilities on the Canal.</p> <p>Continue to promote the Severn Way, although it sometimes does not have much relevance to the river banks.</p> <p>Concern over footpaths being illegally obstructed.</p>	<p>The achievement of sustainable development requires partnerships, working with others, particularly LAs. Landscape quality comes under Town &amp; Country Planning legislation, and the Countryside Agency's remit.</p> <p>The dissolved oxygen levels show an improvement, with 1995/96 being the best years. The higher BOD seen in recent years reflects increased algal growth. Regular boat traffic could reduce algal growth, however opening the canal to boats would have to be considered against the overall effect it would have on the ecology of the canal and loss of associated habitat.</p> <p>It is often not possible for the footpath to follow the route of the river due to landscape, ownership and conservation considerations. Details of obstructed footpaths should be forwarded to local authorities.</p>
P Parker	Would like to see development of traditional farming practices within the Severn Uplands area in the interests of biodiversity and improved water quality, with compensation for farmers where appropriate. Particularly concerned over ploughing of old grasslands in the Lake Vyrnwy catchment. Would welcome stricter controls on landowners relating to draining grassland, slurry spreading etc.	The Environment Agency has no direct controls over farming methods. The Agency is drafting best practice manual for farmers, and supports the concept of agri-environment schemes. The Vyrnwy estate is owned by Severn Trent Water Ltd, and managed by the RSPB. They ensure the estate is managed in a sustainable way. Work has been carried out to identify facilities on farms which need upgrading to provide adequate pollution prevention containment.

*Comments received and the Agency's response*

Name	Comments	Response / reference in Action Plan
Mr T F Preece	<p>Had not heard of the Severn Uplands LEAP although reads local and national press etc.</p> <p>Concern over how to object to notices in the press of proposals to abstract water.</p>	<p>Articles and public notices were in local papers, the LEAP was publicised on radio Shropshire, displays held in libraries, and the LEAP was placed on the internet. We try to publicise LEAPs as far as resources will allow.</p> <p>In the current review of water resource legislation, the government is looking to advertise proposals more widely. Anyone can object to an application for an abstraction licence, and the newspaper advertisements do state this.</p>
N Rose - Severn Fisheries Consultative Council	<p>Suggested complete review of eel fishing, concern regarding over-exploitation. Would like to see elver and mature eel conservation as an objective.</p> <p>Request for information on eel conservation.</p>	<p>Eel conservation and management of fisheries is part of the Agency's responsibilities. Eel exploitation is very slight and there is no elver exploitation. It is intended to create more passage facilities in Upper Severn in future years. Elver fishing in the estuary is regulated by a licensing system. Information sent.</p>
Dr S Spencer	<p>Recognition that agricultural drainage can increase rate of water run-off and likelihood of flooding. Concern over flooding in Cain Valley at Llanfyllin.</p>	<p>Comments noted. We are investigating the feasibility of resolving the flooding in the Cain valley in due course.</p>
Dr J H Sudd	<p>Would like to see more public events - field days, walks etc. Improve consultation by joining with other interested parties to produce a more accessible document.</p>	<p>Comments noted. A public seminar was held in Welshpool to discuss the LEAP, the LEAP was placed on the internet and displays were held in libraries. We try to publicise and consult on LEAPs as far as resources will allow. The Area will be holding an Open Day in 1999.</p>
Mr J C Tate	<p>No additional comments</p>	<p>-</p>
Mr I Theedam (Welshpool Canoe Club)	<p>Dissuade landowners from using river as a sewer. Developments on rivers should not put canoeists at risk.</p>	<p>Comments noted.</p>
Mr J Turner	<p>Also enclosed letter. Concern over flooding and pollution issues.</p>	<p>Comments noted, see Table 1.</p>
F R T Wildblood	<p>Meifod argae are liable to erosion - improvement needed, existing sluice is inadequate.</p> <p>Concern over siting of Meifod sewage works. Better consultation at Community Council level needed on matters of sewage disposal.</p> <p>What consideration has been given by the Agency to use of the Vymwy floodplain for biomass production? Consideration given to potential sources of renewable</p>	<p>Repairs are carried out as necessary, comments passed on to our maintenance department.</p> <p>This is a matter for the Local Planning Authority (LPA) and the Water Company. The Agency is consulted on such matters.</p> <p>Generally land use matters are determined by LPAs, and the agricultural community decide what crops are grown. Section 5.7 of the Consultation Report identifies</p>

*Comments received and the Agency's response*

Name	Comments	Response / reference in Action Plan
Mr D Williams	<p>energy for electricity generation?</p> <p>Would like to see more on promotion of pollution prevention in the LEAP.</p> <p>No mention of groundwater quality monitoring, air quality monitoring.</p> <p>Please confirm abbreviations SGS, S30, AMP3, LU3, S105.</p> <p>Clarify status and availability of Annual Reviews.</p>	<p>various sources of renewable energy.</p> <p>This important subject is covered in Issues 10-13 and also in our day to day work in giving pollution prevention advice and enforcing consents and regulations. Also see Section 5.3.2</p> <p>See Consultation Report Section 5.11.6, 5.8, and Action Plan Section 2.9.2, 2.7.</p> <p>Abbreviations confirmed (Shropshire Groundwater Scheme, Section 30, Asset Management Plan, Land Use Statement, Section 105).</p> <p>Annual Reviews are documents which report on progress made over the previous year. Copies of Annual Reviews will be sent direct to respondents or on request, and should be available at libraries.</p>
Mr R C P Williams	<p>Concerned over recent flood events and impact of obstructions e.g. airfield, caravan sites. Research reasons for increased localised flooding possibly caused by windfarms. Encourage organic farming. Replace coniferous trees with deciduous interspersed larch. Influence bans on use of known harmful fertilisers, pesticides, herbicides and reintroduce liming, crop rotation policies in sensitive catchment areas. Importance of experienced people passing on valuable local knowledge.</p>	<p>Comments noted. Many of these issues will be addressed in the LEAP where they are within the Agency's remit (see Issues 9, 18, 20). More research is necessary to evaluate the benefits of liming before the Agency could press for lime subsidy re-introduction.</p>
V Yates	No additional comments.	

The Environment Agency gratefully acknowledges all comments received.



## **4.0 Further action**

Following the consultation period all the comments received were considered and where appropriate incorporated into the Action Plan. 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.

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

**A total of 19 new or substantially revised actions have been included as a result of the consultation process.**

New actions and changes to existing issues have been identified in the Action Plan tables in Section 4 of the Action Plan.

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 identifies the appropriate actions to resolve the issues addressed and has a five year timetable. Progress will be monitored and reported via an Annual Review, which will be sent to all key partners and interested parties. The full consultation process will be repeated every five years.

