

## ISSUE REPORT COMMENTS

### Ports, shipping and navigation

Comment No	Full Organisation Name	Chap. No	Relevant Issue No	Comment Text
26	Somerset County Council	7.	H1.	<p>Impact of port development on archaeology. Suggested text - Many of the ports and historic harbours around the Severn Estuary have been in use for centuries and consequently have a high archaeological potential which needs to be considered when harbour works are being carried out. Navigation dredging can affect archaeological remains of the submerged prehistoric landscape and uncharted wreck sites.</p> <p>Who is involved : Planning authorities, English Heritage, Royal Commission on the Historical Monuments of England / Wales (RCHME/RCHMW), ports and harbour authorities.</p> <p>Some suggestions: English Heritage and RCHME/RCHMW should be given the opportunity to comment on Harbour Management plans. Methods for reporting or monitoring archaeological finds discovered in dredging should be investigated by the relevant Harbour Authority in consultation with planning authority archaeologists, English Heritage and RCHME/RCHMW.</p>
45	BMIF	7.	P1.	<p>The BMIF identifies with the three main areas of concern. SAC designation should not act as a barrier or disincentive to trade.</p>

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46	BMIF	7.	P1.	The BMIF welcomes English Nature's inclusion of an assessment of the impacts of EU legislation on maritime activity within the LIFE study.
47	BMIF	7.	P2.	The BMIF would not support statutory licensing of all tidal water boat owners. The BMIF would favour the voluntary approach, linked to more effective information dissemination.
49	BMIF	7.	P7.	The BMIF cannot over emphasise the importance of maintenance dredging in maintaining access to boating facilities. Maintenance dredging will always involve some environmental impact, however concerns regarding such impact must be set in the wider socio-economic context.
71	Inland Waterways Association, London	7.		IWA endorse the statement that "Transporting goods by ship is by far the most energy efficient method and reduces road congestion".

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72	Inland Waterways Association, London	7.		An adequate grant system and suitable investment in infrastructure is required together with support services to ensure that waterborne transport is always a viable option. While existing Freight Facilities Grants available through DETR are welcome, their scope is very restrictive and they remain under-utilised as a result. The scope needs to be extended to cover the improvements which are so essential to the waterways themselves. It is felt that the report might have said this.
73	Inland Waterways Association, London	7.	P1.	Rather than using English Nature, this study should be undertaken by an impartial body without legislative powers, such as a consulting firm with expertise in estuary engineering, maritime safety and nature conservation.
74	Inland Waterways Association, London	7.	P2.	IWA do not normally agree with enforced pilotage or excessive restrictions being placed on recreational users of waterways.
76	Inland Waterways Association, London	7.	P5.	In the title and text "canal" should be replaced by "inland waterway".

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77	Inland Waterways Association, London	7.	P5.	IWA considers there are many river cruiser owners on the Severn who would need advice on using the estuary.
78	Inland Waterways Association, London	7.	P5.	The IWA should be noted specifically as it is the main organisation representing inland waterway users groups.
79	Inland Waterways Association, London	7.	W1.	Text should be changed to "the main sources of litter are 'thought to be' recreational users, shipping and sewage". IWA believe it is likely that waterside industrial premises and fly tipping are major sources of litter. Some analysis and evidence is required before stating major sources.
106	Sedgemoor District Council	7.		1992 Figure for the Port of Bridgwater should read 'All cargoes - 127,000 tonnes'.
120	Ministry of Agriculture, Fisheries and Food	7.		Paragraph 4, should read FEPA II 1985 not EPA 1990.

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121	Ministry of Agriculture, Fisheries and Food	7.	P7.	Para 1, "It is generally considered that dredging....fine sediment regime" may be true in some cases but it cannot be accepted as a general statement. It is not necessarily the case that maintenance dredging has much less impact than aggregate dredging. It will depend on the circumstances.
122	Ministry of Agriculture, Fisheries and Food	7.	P7.	The "Bristol Channel Marine Aggregates Resources and Constraints Study" will barely touch on maintenance dredging and will not give confirmation of the extent of effects of maintenance dredging.
151	Bristol City Council	7., 13.	P1., N7.	The importance of trade and shipping to the area has caused port companies to be concerned about the restrictions that the pSAC may have on their ability to expand.
152	Bristol City Council	7., 3.	P6., D1.	Further growth clearly has to be balanced with the views of conservation groups and local people concerned over the effects of uncontrolled expansion. The Bristol Port Company has a large operational dock area and also controls land within the wider Avonmouth area. The Key Regeneration Area and Railfreight Terminal, should provide expansion opportunities whilst preserving the nature conservation value of the coast - for example, at areas such as Lamplighters Marsh and parts of the SSSI foreshore.

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160	Bristol City Council	13., 7.	H4.	This response seeks to achieve a balance between environmental protection and economic development, with particular regard to the operational needs of the Bristol Port Company.
215	Country Landowners Association, Gloucestershire	7., 8.	W21.	Concern over the danger of environmental disasters caused by shipping in the estuary. A co-ordinated system for response to an environmental disaster must be created and maintained.
258	British Waterways, Gloucester and River Severn	7.		Maintenance dredging Para. 3 re. accumulation at disposal sites, appears to include the disposal sites for G & S Docks, in which case this will be extremely useful in persuading the EA to permanently consent the Purton disposal site. This should be checked with the author of this report.
259	British Waterways, Gloucester and River Severn	7.		Harbour Authorities BW should be mentioned as being the Navigation Authority upstream of Gloucester (as well as G&S Canal) as SES boundary is north of Gloucester.

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260	British Waterways, Gloucester and River Severn	7.	P6.	Any development of Sharpness Docks would require conservation input, and this could be mentioned here.
261	British Waterways, Gloucester and River Severn	7.	P7.	The EA have told BW that they need to demonstrate that the disposal operation at Purton has no significant impact for it to be consented on a permanent basis. It is felt that the Welsh Office should be asked whether their study is relevant to this specific case, and if not, whether it could be extended to be made so.
360	Youth Hostels Association	7., 3.	D6.	The use of the Estuary for the transport of goods and passengers and consider that there is considerable scope for expansion to ease pressures on trunk roads and motorways.
503	Individual	7.		Concern over statement that Bristol can handle vessels up to 130 000 dead weight tonnes as respondent advices that, at the time of the Bristol Bill, the access to Portbury was limited by a permanent seabed feature downstream called "The Bridge" which also effectively meant a 45 foot draught. Considered that this feature would have been too expensive to move, and that at neap tides the time for entrance to the largest vessels at Portbury is severely limited. (More specific information available).

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506	Individual	7.		<p>Harbour Authorities</p> <p>Many of the port authorities in the estuary are Statutory Undertakers operating under their own Acts of Parliament and possessing considerable autonomy and authority - it is suggested that this special position could be further explored.</p>
507	Individual	7.		<p>The Usk Tidal Basin, authorised by an Act of 1967, but not built, would be accessible to 100 000 dwt vessels on 100% of tides. Cardiff is limited to approximately 30 000 dwt vessels but has walls 75 ft high in Queen Alexandra Dock which would, with deepening and a new lock accept much larger ships. Newport is in the same position. Studies of Barry Roads show great potential for offshore moorings because of their great depth. This is where the larger vessels bound for Bristol have to wait until tides are suitable. (Additional inf. available).</p>
593	CPRE, Avon / CPRW, Monmouthshire	7., 12.	P6., L1.	<p>It should not be overlooked that port development can have an adverse influence upon landscape and upon adjacent wildlife conservation sites.</p>
594	CPRE, Avon / CPRW, Monmouthshire	7.		<p>For consistency, the word 'draft' (US orig.) should be changed to 'draught' (UK orig) with relation to figures to the Royal Portbury Dock.</p>



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595	CPRE, Avon / CPRW, Monmouthshire	7.		9th Para. of section - text should read "British Waterways is" not are.
596	CPRE, Avon / CPRW, Monmouthshire	7.		It is in respect of the Royal Portbury Dock that the wildlife corridors have been created.
597	CPRE, Avon / CPRW, Monmouthshire	7.		It is assumed that Bristol City Docks mainly handle dredged material.
598	CPRE, Avon / CPRW, Monmouthshire	7.		Harbour Authorities The Gloucester Harbour Trustees are also responsible for the tidal reaches of the River Wye (last sentence).
599	CPRE, Avon / CPRW, Monmouthshire	7.		Search and Rescue At least until the early 1990's, a lifeboat operated out of Portishead.

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600	CPRE, Avon / CPRW, Monmouthshire	7.	P2.	The statement about "the number and size of ships using the Severn" contradicts what is said at para. 1 under Sailing and boating on p66. "the estuary offers the opportunity for large open areas of water with little other boat traffic".
682	Cardiff County Council	15., 13., 7.	N7., M10., M7., P1.	Planning Dept. comments The Report provides a context within which to address the possible Special Area of Conservation (pSAC). If confirmed as a candidate site this would require Cardiff County Council (and all other relevant authorities (RA's)) to co-operate with the other RA's to prepare a statutory management plan.
690	Cardiff County Council	7.		Planning Dept. comments The importance of the port of Cardiff to the economy of the sub-region needs to be emphasised.
693	Cardiff County Council	7.	P7.	Planning Dept. comments Further study needed of the effect of dumping material dredged for navigation channels.
738	The Ports Panel	7., 15.		For final framework document - suggested statement outlining the basic requirements of this chapter.  "To ensure the continued growth and vitality of the Severn's ports, wharves and harbours and their related developments".

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776	Individual	7.	P6.	Feel that there has been rapid and uncontrolled port expansion particularly between Severnside and Avonmouth and at Portbury Docks - often to the detriment of conservation.
798	Individual	7., 6.	P2., T11.	Jet skis should be banned and all water users should receive proper training and licencing.
799	Individual	7., 6.	P6., T11.	Wildlife suffers both from noise and physical pollution.
832	National Association of Boat Owners	7., 13.	P1., N7.	English Nature exercises far too much influence to the potential detriment of users. Its activities and aspirations should be curbed.
859	Nuclear Electric Ltd	15., 6., 7.	M11., T11., P2., T12.	Avoid segregated zone controls as these can be too polarising.

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868	Individual	7.	P1.	Regarding port development - the pSAC is good.
931	Individual	5., 7.	C4., P7.	Further consideration required of beneficial use of silt from port dredging work along face of saltings.
936	Individual	7.	P3.	Individual payments by yachtsmen would be uneconomic to collect, general tax fund provides for aids to motorists other sports and should include navigation aids.
937	Individual	7.	P7.	Extend the Welsh Office study to whole area and continue for the next 20 years plus.