

## ISSUE REPORT COMMENTS

## Waste management and pollution

Comment No	Full Organisation Name	Chap. No	Relevant Issue No	Comment Text
96	Bitton Parish Council	8.		That a system of bonding be applied to companies operating within the area so that when sites are vacated or pollution caused, the companies can be made to rectify the harm caused to the environment.
101	Monsanto	8.		It is stated that the manufacture of PCB was banned in the UK in 1977. This was not the case, this was the date that we voluntarily ceased production at the Newport site. The use of PCB has been progressively restricted and in 1986 the sale and use in new plant and equipment was banned in the UK as part of an EC initiative.
123	Ministry of Agriculture, Fisheries and Food	8.		This section requires redrafting, the following is suggested: The UK's obligation under the London Convention 1972 and the OSPAR Convention 1992 are implemented by means of licence controls under the Food and Environment Protection Act 1985 (FEPA). MAFF is the licensing authority under FEPA for the disposal of waste and the deposit of other materials in connection with construction in the sea around England and Wales. Marine incineration and the disposal at sea of industrial wastes and minestone are no longer permitted. The dumping of sewage sludge will end in 1998 and thereafter dredged material will be the only waste routinely licensed for disposal at sea.

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124	Ministry of Agriculture, Fisheries and Food	8.		The OSPAR convention does not limit the disposal at sea to just dredged material. It does prohibit the disposal of industrial wastes at sea and will prohibit the disposal of sewage sludge to sea after 31 December 1998. Other materials such as fish waste and inert materials are allowed to be disposed of at sea under OSPAR 1992.
125	Ministry of Agriculture, Fisheries and Food	8.	W21.	MAFF should have been mentioned with respect to the Sea Empress incident.
153	Bristol City Council	8.		Avonmouth plays an important role in waste management. It is the site of the Bristol Incinerator and of Wessex Water's Treatment Plant which includes the new facility to produce 'dry' sewerage and avoid estuarine disposal of untreated wastes. The Health and Environmental Services Directorate undertakes extensive pollution monitoring in the Avonmouth area.
161	Dunster Beach Holidays	5., 8.		Please provide any further information available regarding progress in proposed coastal defences, clean-up operations.

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177	Kingston Seymour PC	8.	W1., W2., W3., W4., W5.	There is an urgent need to reduce contamination from sewage and other waste material and to improve the quality of identified bathing waters.
178	Kingston Seymour PC	8.	W5.	It is noted that EC Directive failures in bathing water quality include Clevedon, Sand Bay and two beaches at Weston and that no details are given as for status of any of these (in contrast to other failed beaches) So ... what is happening?
203	Country Landowners Association, Gloucestershire	4., 8.	R5., W11.	Due to close liaison between MAFF, EA and farmers, farm pollution incidents are decreasing and represent less than 1/5 of all pollution incidents so that agriculture is no longer the main source of Category 1 incidents.

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204	Country Landowners Association, Gloucestershire	4., 8.	Related to R5.	Concern about the application of sewage sludge to agricultural land (likely to increase when sea-dumping ceases). Spreading of untreated sludge to farm land is already causing supermarkets and others to refuse to accept products (including apples) from land treated in this way. Farmers should be warned of the dangers of not securing written undertakings from water companies before agreeing to sludge being spread. Water companies must propose and adopt acceptable methods of disposal be it land-borne or otherwise.
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.

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216	Country Landowners Association, Gloucestershire	8.	W2.	Landowners' concern over the increase of fly tipping (since the cost of disposal has risen sharply). Landowners suffer in two ways i) dumping of rubbish in hedges and woodland, ii) increased dumping in rivers , streams and ditches with two effects, contamination of surface water and, through the disposal of garden waste, the introduction of non-native plants in waterways (e.g. giant hogweed). Latter combines with marine refuse to greatly increase the dumping of waste on to beaches which causes added costs and can cause a health hazard to the public. It is suggested that these problems are dealt with at source (not the land or riparian owner who is left with the task of cleaning up fly tips). Solutions need to be found at local level.
217	Country Landowners Association, Gloucestershire	8., 4.	W11., W12., R5.	Levels of nutrients and pesticides in run off are now negligible.
218	Country Landowners Association, Gloucestershire	8., 11., 10.		Some CLA members are fishery owners, and are consequently concerned about both water quality, maintenance of fish stocks and river flows.

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240	WDA, Pontypridd	15., 3., 8., 12.	M7., W24., L1.	In line with central Government policy on Sustainable Development, the WDA works in an integrated way with others to investigate the benefits and impacts of its activity on the environment. They have been working with Industry, the Environment Agency and others on the Dee and SABINA Waste Management projects. In the South Wales Valleys, they have been working with Local Authorities, CCW, EA and others to produce landscape strategies which not only promote positive landscape and environmental action but also sit alongside UDP's, LEAP's, Countryside Strategies and eventually Local Biodiversity Action Plans to help guide more beneficial and sustainable forms of development. It is planned to extend this approach to Newport and the Vale of Glamorgan over the next two years which, it is expected, will bring positive environmental and economic benefits.
262	British Waterways, Gloucester and River Severn	8.		Sludge disposal to land It is encouraging to hear that the G&S canal catchment is being considered as a candidate for Sensitive Area status under the Urban Waste Water Treatment Directive.
263	British Waterways, Gloucester and River Severn	8.		Disposal at sea This will be limited to dredged material.

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264	British Waterways, Gloucester and River Severn	8.		Organic Chemicals TBT should have been mentionned - was of concern with the discharge from Sharpness Dry dock.
265	British Waterways, Gloucester and River Severn	8.	W8.	BW is able to adjust the pumping regime to avoid the risk of salt water reaching abstraction at Gloucester (during high tides and low river flows).
266	British Waterways, Gloucester and River Severn	8.	W8., W16.	Pollution risks from contaminated land (Gas Works, Monk Meadow) is not mentioned as a risk.
310	Wessex Water	8.	W5.	Wessex Water have made a commitment to replace chlorine based disinfection by year 2000 and will be installing Ultra Violet disinfection at their treatment works at Kingston Seymour Weston super Mare, West Huntspill, Bridgwater and Minehead.
311	Wessex Water	8.		Secondary treatment will be installed at Portbury Wharf and Avonmouth treatment works by year 2000 as a response to the redesignation of the Estuarial / Coastal boundary.

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312	Wessex Water	8.		<p>Thornbury = Partial secondary treatment operational 1997, full secondary for 1999 completion.</p> <p>Avonmouth = Secondary treatment scheme to be completed by 2000.</p> <p>Portbury = Full secondary treatment to be completed in 1999.</p> <p>Kingston Seymour = Full secondary treatment and UV disinfection by 1999.</p> <p>Weston super Mare = Full secondary treatment, Improved storm storage, and full secondary treatment by 1999.</p> <p>Minehead = Full secondary treatment and UV disinfection by 1999.</p> <p>Doniford = Improved screening and extended outfall completed in 1997.</p> <p>Bridgwater = Disinfection method will be changed to UV disinfection by 2000.</p> <p>West Huntspill = Disinfection method will be changed to UV disinfection by 1999.</p>
313	Wessex Water	8.		<p>There is no mention of Porlock in this section. Three continuous unscreened outfalls will be eliminated and given full secondary and disinfection treatment by an innovative membrane filtration process. This will be commissioned in early 1998.</p>
314	Wessex Water	8.	W2.	<p>All continuous discharges will have fine screening, or equivalent by 1998. Avonmouth STW had fine screening installed in Summer 1997.</p>



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361	Youth Hostels Association	8.	W2., W3.	YHA welcome the improved facilities for sewage disposal.
362	Youth Hostels Association	8.		Concern about waste disposal in disused limestone quarries.
434	Caldicot and Wentlooge Internal Drainage Board	5., 8.	W1.	<p>One of the main problems the Board faces in adequately maintaining watercourses, is the large amount of extraneous rubbish which finds it's way into the watercourses (incl. 3 piece suites, supermarket trolleys, rubbish bags etc.) This is not only environmentally unacceptable but, greatly increases the flood risks from blockages of culverts and interruption of the flow of flood water along the watercourse.</p> <p>Some Suggestions  Any help the Local Community can give in minimising this problem would be gratefully appreciated.  Meanwhile, the Drainage Board will continue to liaise with the Local Authority such that further improvements in the manner in which the Drainage Board work can be carried out in as environmentally acceptable way as possible can continue to be pursued.</p>

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463	South Gloucestershire Council	8.	Many	Some of the Issues described are somewhat passive, e.g. W17 p 109 "Consideration could be given .... ". Without a firmer line we doubt that the Report will be much more than an index of the existing commitments.
464	South Gloucestershire Council	8.	W17.	S Glos. Council's main landfill site is Harnhill, Olveston. Recently an improved leachate disposal system was installed to transfer treated leachate to the Severn Estuary in compliance with EA requirements.
539	CPRE, Avon / CPRW, Monmouthshire	3., 8.	M17., W	Nowadays, it seems, such facilities as sewage treatment works can be an educational resource, if not quite a tourist attraction.
601	CPRE, Avon / CPRW, Monmouthshire	8.		This is a very useful summary of responsibilities for reference purposes.
602	CPRE, Avon / CPRW, Monmouthshire	8.		The third aim would have been more clearly expressed if it had referred to re-use, recycling and reduction in landfilling.

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603	CPRE, Avon / CPRW, Monmouthshire	8.		Sewage effluent disposal It is unclear as to whether a distinction is to be drawn between "discharges of sewage that are additional to direct discharges" and "untreated sewage" mentioned at para. 2 of this section.
604	CPRE, Avon / CPRW, Monmouthshire	8.		Controlled Waste Management A definition of "controlled waste" should have been provided to distinguish the expression from the concept of control of the waste management regime.
605	CPRE, Avon / CPRW, Monmouthshire	8.		Controlled Waste Management Olveston, being only a small village, its location should have been identified, maybe by indicating that it is near Aust or within S Glos.
606	CPRE, Avon / CPRW, Monmouthshire	8.	W17.	Waste Management Facilities Without the vigilance and firm action of the former Avon County Council, there would now be two landfill / landraise sites on the coast near to Aust, and another not far from the M4 / M5 Almondsbury interchange. This action has resulted in fewer landfills north of Severnside than waste management operators would have wished.

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607	CPRE, Avon / CPRW, Monmouthshire	8.		Illegal waste management facilities It is considered rather odd to describe fly-tipping as waste "management"; the more accurate term would be "mismanagement". The word "disposal" should have been used.
608	CPRE, Avon / CPRW, Monmouthshire	8.		Contaminated land Section Para 3. The large scale regeneration programme should help to minimise development on greenfield sites, an outcome very much favoured by CPRE and CPRW.
609	CPRE, Avon / CPRW, Monmouthshire	8., 4.	W11., R5.	Re: text of para 2. Sludge Disposal to land. Care needs to be taken over soil enhancement in areas where this would be detrimental to the maintenance of plant communities that are sensitive to high nutrient levels.
610	CPRE, Avon / CPRW, Monmouthshire	8.		Sludge disposal to land MAFF is currently revising its Codes of Good Agricultural Practice for the protection of air, soil and water.

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611	CPRE, Avon / CPRW, Monmouthshire	8.		Bacterial quality of bathing waters Which are the 6 "non-identified waters" that have failed to meet standards?
612	CPRE, Avon / CPRW, Monmouthshire	8.		EC Dangerous Substances Directive Grammatical error - 2nd sentence should read "to DoE which decides whether the standards".
613	CPRE, Avon / CPRW, Monmouthshire	8.	W18., W15.	Re: text in Background - EC Dangerous Substances Directive Reliance upon 'annual average concentrations' of contaminants is unsatisfactory, especially in light of reference at Background Section, N Sea Conference ... para 4. to arsenic. High intermittent discharges could cause harm to estuarial life and to human beings and, for this reason, a reduction in the level of chemicals that enter the waters must be actively pursued.
614	CPRE, Avon / CPRW, Monmouthshire	8.		Does the "contaminated land within a chemical manufacturing site" correspond with that discharging PCB's from the Newport area (para. 3) and with the "manufacturing land" referred to under the Organic Chemicals section (para. 2).

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615	CPRE, Avon / CPRW, Monmouthshire	8.		Organic chemicals The precise impact of PCBs on the estuary is not obvious in that take-up appears to be confined to sediments.
616	CPRE, Avon / CPRW, Monmouthshire	8.	W1.	Much debris is carried up and down the Wye on the tide, most of it in the form of driftwood and dead vegetation from the banks.
617	CPRE, Avon / CPRW, Monmouthshire	8.	W17.	While it is to be hoped that no new landfill / landraise sites will be authorised on coastal plains or where they would have an adverse impact upon the Severn, latest containment methods will improve management of leachates. The control of old facilities is likely to be more problematical.
618	CPRE, Avon / CPRW, Monmouthshire	8.	W20.	The Environment Agency's free publication "Environment Action" sent to organisations and members of the public, is a fruitful source of information on the subject of enforcement proceedings. Other means of bringing action to the public attention, may be through the press if this is not already done, would lead to reassurance that polluting companies and undertakers are, indeed, being penalised.

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619	CPRE, Avon / CPRW, Monmouthshire	8.	W23.	By their nature, accidents at industrial sites can only be forestalled by improvements to plant and by adherence to sound operational practices. Regular Agency inspections should pinpoint potentially dangerous shortcomings.
620	CPRE, Avon / CPRW, Monmouthshire	8.	W24.	Householders ought also to be closely involved in waste reduction. Some local authorities are actively encouraging such action as segregation of re-usable and recyclable items from domestic waste, plus home or communal composting.
621	CPRE, Avon / CPRW, Monmouthshire	8.	W24.	Respondent would like to know more about the SABINA initiative.
622	CPRE, Avon / CPRW, Monmouthshire	8.	W24.	It is hoped that the Welsh Office will issue progress reports that will be readily available to all with an interest. Perhaps the Agency can publicise SABINA in Environment Action as a means of bringing it to public attention. If successful, encouragement may be given to the setting up of a similar scheme on the English side of the estuary - though it is believed that it is not easy to engage the involvement of small and medium-sized firms in waste reduction practices.

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694	Cardiff County Council	8.	W2., W3., W5., W6.	<p>Planning Dept. comments</p> <p>It is important to acknowledge the contribution that the water companies have on improving water quality via the construction of major waste water treatment plants (e.g. in Cardiff), but also the need for further progress.</p>



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719	Individual	13., 8., 3., 15.	W11., W12., W14., W2., W3., W5., D3., M17.	<p>Would like to see a reduction in the damage to biodiversity from sewage, heavy metals, dangerous chemicals, development (including the Second Severn Crossing, Gwent Levels Motorway, Cardiff Bay Barrage, proposed Airport, proposed Barrages), oil exploration and climate change.</p> <p>Some suggestions :</p> <p>Publish proof that the level of biodiversity is sustainable, and even increasing by the Millenium.</p> <p>Launch a massive public education initiative (in plain English) educating the public about i) the importance of biodiversity, ii) estuaries (they can then become proud and fascinated about the internationally important Severn Estuary), iii) what they can do to improve the estuary's wildlife, iv) learn what the threats are (specifically naming and shaming 'culprits' (even if just suspected)), v) learn about designations which could / do protect the estuary, vi) environmental law.</p> <p>Produce regular updates (with maps) for all households (maybe in local papers, like N Somerset do) showing the threats from the above and current impact on the biodiversity of the estuary, clearly indicating which way the trends are going (with current improvement measures), as well as the risks to human health and detailing declining incomes for fishermen (relating to declining stocks).</p> <p>Stop the 'attrocious' development proposals and oil exploration which haven't gone ahead.</p> <p>Push businesses and boats to use alternatives which do not cause heavy metals and dangerous chemicals to enter the estuary.</p> <p>Regularly produce a directory showing which</p>

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				<p>businesses (and boaters (if possible)) do and do not use the 'green' alternatives (sources of which to be identified) thereby allowing consumer power to lobby the companies to change practices.</p> <p>Inform the public even if legal action against polluters isn't possible for economic reasons.</p> <p>Encourage people (legally if possible) to avoid specific breeding, feeding and resting 'home' areas of wildlife even if only at particularly sensitive times.</p> <p>Actively improve and create habitats (particularly further inland to help counteract the problems of rising sea levels (if not damaging a valuable existing habitat) and wildlife corridors.</p>
721	Individual	8.	W2., W3., W5., W6., W7., W20.	Ensure that sewage outfalls (including stormwater) are upgraded to meet EC standards for estuarine status so that the sewage is all given (at least) secondary treatment.
725	Individual	8.		Stop MAFF's sole responsibility for licensing.

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726	Individual	8.	W2., W3.	Join with local council and tourist officers to reduce sewage from sanitary products i.e. 'bag it and bin it in special disposal units' and provide directories of alternatives to 'disposable' sanitary products.
739	The Ports Panel	8., 15.		For final framework document - suggested statement outlining the basic requirements of this chapter.  "To work towards the minimisation of pollution and waste throughout the estuary".
754	The Ports Panel	8., 6.		Suggested text for Key Issue in Strategic Framework Document Water Quality (a) There is a need to ensure that water quality in the Severn Estuary and its fluvial tributaries are improved, where necessary, to comply with National and European agreed standards. (b) Those involved in water based recreation have concerns about the water quality of the estuary. (c) Continue compliance with the water quality standards, with the ultimate aim of improving on the current status.  Promote actions that minimise the risk of spillage of contaminants into the estuary.  To ensure those regulatory standards that apply are consistently applied and enforced.

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755	The Ports Panel	3., 8.		<p>Suggested text for Key Issue in Strategic Framework Document</p> <p>Contaminated Land</p> <p>(a) There is a need to promote more widely the benefits of reclamation of areas of contaminated land, to reduce the pressure on green field sites, and to promote redevelopment for economic use and environmental gain.</p> <p>(b) In some areas the legacy of industrial development is areas of land that are contaminated. It is recognised that in future these 'brownfield' sites will become more important for development use. The redevelopment of these areas is encouraged by the exemption of reclaimed contaminated land from the Landfill Tax. The Severn Estuary has many examples of 'brownfield' site redevelopment including Cardiff Bay, Waterfront Barry and further regeneration projects along the coast in England including Minehead. These developments turned disused land into areas suitable for all types of development and recreational facilities. This type of development reduces the pressure on the general landscape of the estuary and should be encouraged whenever possible.</p> <p>(c) To reduce, with assistance from local authorities and the introduction of an exemption for contaminated land from the Landfill Tax, the financial burden associated with redevelopment of historically contaminated land.</p> <p>To avoid future contamination of land through compliance with the current regulations and facilitating inspection by competent authorities.</p>

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777	Individual	8.	W1.	Litter debris is an ongoing problem with large deposits of rubbish to be found on most tidal shores.
778	Individual	8.	W4., W21.	A number of oiled birds have also been observed suggesting illegal discharges.
779	Individual	8.	Most	Major accidents at industrial sites (i.e. Albright and Wilson 1996) remain a potential source of environmental pollution for the estuary.
789	Individual	15., 8.	M17.	Availability of information to the public - especially with regard to toxic release.
791	Individual	8.	W20.	Polluters and breakers of regulations to be prosecuted.
793	Individual	8.	W1.	Areas of the estuary should be 'tidied up' as they look shabby and unattractive. It is an enormously interesting area on both sides but at present isn't presenting itself as well as it could.

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800	Individual	8.	W1.	Litter comes partly from tourists and partly from shipping. It is unsightly and harmful to the environment.
801	Individual	8., 3.	W2., D9.	Sewage debris can only be made worse by any form of barrage.
805	Individual	9., 8.	A4.,	Pollution and dredging destroys natural life that affects the fisheries.
829	Lancaster University	8.	W14.	The importance of metals in sediments is underestimated. Erosion of marshes will re-introduce metals to the water bodies. Personal research undertaken in the Severn Estuary / Bristol Channel has shown some very high levels in some areas. Has published papers and has an active research interest in this and in other coastal areas.
840	Individual	6., 4., 13., 5., 8.	T7., T5., R6.	More fields are now ploughed by the coast paths. The soil can 'run off' to the estuary thereby adding to the silt problem. Ploughs taken to very edge of cliffs, then huge cracks can appear in dry weather accelerating landslip. Suggested that ploughs should not be taken to within 12 feet of the cliff edge.

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843	Individual	8.		Lessen all forms of pollution.
846	Individual	8.		Catchments!
847	Individual	8.	W1., W2., W3., W5., W6., W7.	Sewage and litter top the pole with regard to the general public - why has the Environment Agency not made this issue a Number 1 priority.
848	Individual	8., 5., 15.	W1., W2., W3., W5., W6., W7., C4., M16.	Relevant expertise exists aplenty re sewage and litter, and the topic must be researched.

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851	Individual	8.	W24.	What happened to the project 'SABRINA'.
858	Nuclear Electric Ltd	8.	W10.	Should also consider atmospheric emissions from road traffic.
877	Individual	8.	W1., W2., W3.	Concern re. beach pollution (mainly sewage and water-borne litter). Tourist litter is containable whereas water-borne is not. Peculiarity of cost of beach cleaning at Bran because dune area of beach privately owned by householders.
884	Individual	12., 8.	L1., W22., W23.	The County Councils, Welsh Office and the DETR should be more vigilant - Avonmouth and Hinkley Point are eyesores and dangerous (reference to buffer stores of bread and milk stored outside Cwmbran). Also concern expressed regarding nuclear submarines using Cardiff (should be kept at major installations).
888	Individual	8.	W2., W3.,W5., W6., W7.	The English local authorities need to stop polluting the Severn with raw sewerage - at least they should catch up with the Welsh practice.



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889	Individual	8.	W10., W15., W19., W23.	Emission to air, land and sea from Avonmouth needs far more control as this is the area's greatest polluter (after or above Hinkley Point).
893	Individual	8.		Sensible anti-pollution measures should be taken to protect the sea, including stop dumping rubbish or pollutants.
896	Individual	5., 8.	C3., W17.	Could arrange for the storage of soil, subsoil, hardcore etc. in suitable areas near the river to provide material for flood-banks which would reduce land-fill problems.
918	Individual	8., 4., 9.0.	W12., W15., A4.	In order to ensure an environmentally sustainable estuary (of international importance) there should be an absolute prohibition on any activity that damages (to any degree) the estuary or its life, i.e. pesticides, chemical pollution, minerals and aggregate extraction should be prevented from happening.

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919	Individual	3., 8.	D4., W2., W3., W5., W6., W7.	Problem of proper sewage management must be addressed, for those areas which currently have no access to mains sewage disposal and where current arrangements are inadequate.
920	Individual	8.	W - All	Much more robust approach to pollution control is needed. Very sensitive area with a lot of industry, sewage disposal etc., threats of more development. Effective enforcement will be essential if the environment is to be protected.
922	Individual	8.	W10.	Does discharge of aircraft fuel have any effect on the quality of water in the estuary?
924	Individual	8.		There is a need for continuous monitoring (water analysis) where commerce is concerned, trust is never enough on its own.
938	Individual	8.	W21.	Continue to oppose oil tanker discharge points in tidal waters.

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954	Individual	8.		Levels of noise (especially from heavy lorries, traffic levels and loud radios in cars) and light pollution (poor quality of street lighting).
957	Environment Agency, Bridgwater	8., 10.		Co-ordination of prioritisation of expenditure by water companies and others to ensure resources are used to the best environmental effect.
974	WDA, Pontypridd	15., 3., 8., 12.	M7., W24., L1.	In the South Wales Valleys, they have been working with Local Authorities, CCW, EA and others to produce landscape strategies which not only promote positive landscape and environmental action but also sit alongside UDP's, LEAP's, Countryside Strategies and eventually Local Biodiversity Action Plans to help guide more beneficial and sustainable forms of development. It is planned to extend this approach to Newport and the Vale of Glamorgan over the next two years which, it is expected, will bring positive environmental and economic benefits.