

THE INSTITUTION OF ENVIRONMENTAL SCIENCES

CODE OF PRACTICE ON CONSERVATION, ACCESS AND RECREATION

Comments of the Institution of Environmental Sciences on the Consultation Draft.

June 1999

In general the Code of Practice is considered to be a comprehensive and adequate document. There are just two sections on which we have a comment.

Paragraphs 2.4, 2.5 and 2.6 dealing with 'Integrated approach' use the term 'should' in referring to the preparation of plans, assessments of environmental value, monitoring and review of plans and work on LEAPS. A stronger obligation should exist and there should be a mechanism for ensuring implementation. The responsibilities of the Environment Agency are spelt out but no specific responsibilities listed for other "relevant" bodies such as water, sewerage or waste authorities/companies.

Paragraphs 5.17 and 5.18 deal with Navigation and Flood Defence. They contain recommendations for strategic planning and inclusion of recreational activity. There should be a strong recommendation for the Agency and other responsible bodies to carry out more extensive research into the behavioural characteristics of estuarine and coastal zones to establish more precisely their capacities for alternative uses and their requirements for conservation.