



*The Cam Valley Forum is an unincorporated association,
registered with HMRC as a charity.*

Chairman: Stephen Tomkins Secretary: Alan Woods

info@camvalleyforum.uk

<https://camvalleyforum.uk>

CAM VALLEY FORUM

Responses to the initial consultation on a tentative proposal for a designated bathing water at Sheep's Green on the River Cam

We invited responses to our tentative proposal that the River Cam at Sheep's Green should be formally designated as a Bathing Water under the Bathing Water Directive. The proposal is on our website at https://camvalleyforum.uk/wp-content/uploads/2021/02/cvf_swimming.pdf.

The document was circulated on 1 February to people and organisations who we thought would be interested in or affected by the proposal, and there was an article about it in the *Cambridge Independent* on 17 February. Responses were requested by 21 February.

This paper lightly summarises and groups the 75 responses received to date under several topic headings. We are most grateful to everyone for their comments on the proposals, both positive and negative. These are helping us to understand the full range of interests, challenges and opportunities that need to be taken into account in deciding whether and how to proceed.

The Forum is circulating this document to all respondents. We are now looking to form a steering group to take forward an initiative to make the Cam safer for swimming.

If you wish to comment further, having seen this summary, please email info@camvalleyforum.uk.

Michael Goodhart and Jean Perraton
Cam Valley Forum
8 March 2021

CONTENTS

| | |
|--|-----------|
| OVERVIEW | 3 |
| 1. PRINCIPLES AND OBJECTIVES | 4 |
| 1.1 Improving the environment | 4 |
| 1.2 Improving opportunities for wild swimming and other water recreation | 5 |
| 1.3 Safeguarding the health of swimmers in the Cam | 6 |
| 1.4 The need for a designated area as such | 6 |
| 2. CHALLENGES - MANAGING POTENTIAL CONFLICTS | 8 |
| 2.1 Statutory controls | 8 |
| 2.2 Regulating swimming | 8 |
| 2.3 Conflicts with the Learners Pool on Sheep's Green | 8 |
| 2.4 Conflicts with the Canoe Club | 9 |
| 2.5 Anti-social behaviour | 10 |
| 2.6 Other potential conflicts between users | 10 |
| 3. USER SAFETY CONCERNS AT SHEEP'S GREEN | 11 |
| 3.1 Swimmers and boats | 11 |
| 3.2 Safety of swimmers in general | 11 |
| 3.3 Safety of children in particular | 12 |
| 4. ENVIRONMENTAL CONCERNS AT SHEEP'S GREEN | 13 |
| 4.1 General pressures on the local area | 13 |
| 4.2 Water Quality | 14 |
| 4.3 Biodiversity | 15 |
| 4.4 Landscape | 15 |
| 5. POSSIBLE ALTERNATIVE LOCATIONS TO SHEEP'S GREEN | 17 |
| 5.1 Grantchester Meadows | 17 |
| 5.2 Snobs' Stream | 17 |
| 5.3 The Former Ladies Bathing Area | 18 |
| 5.4 Other possibilities | 18 |
| 6. PRACTICAL MANAGEMENT REQUIREMENTS | 19 |
| 6.1 Water Testing | 19 |
| 6.2 Desilting | 19 |
| 6.3 Local site management | 19 |
| 6.4 Providing lifeguards | 20 |
| 6.5 Transport | 20 |
| 6.6 Costs | 20 |
| 7. PROCESS CONSIDERATIONS | 21 |
| 7.1 Work required in making an application | 21 |
| 7.2 The role of local statutory authorities | 21 |
| 7.3 The role of DEFRA | 21 |
| 7.4 Useful information sources | 21 |

OVERVIEW

1. PRINCIPLES AND OBJECTIVES

There is concern over the state of the river environment in and around Cambridge and a desire to see improvements. Many people value the health and recreational benefits of wild swimming and wish to make this safer. Views are divided on whether, in both cases, a bathing water designation is a prerequisite.

2. CHALLENGES - MANAGING POTENTIAL CONFLICTS

Cam Conservancy byelaws control swimming on the upper Cam up to Grantchester. There are concerns that any increase in wild swimming at Sheep's Green could exacerbate existing management challenges for the Learners Pool. The Canoe Club is very popular with members and used for training courses. The river and bank there can become congested at peak times. There are worries about anti-social behaviour.

3. USER SAFETY CONCERNS AT SHEEP'S GREEN

The river at Sheep's Green is two metres deep and intensively used by canoes, kayaks, paddleboards and punts. Those swimmers who are difficult to see in the water can be at risk of being hit. Children, who may be inexperienced, swim here when the Learner Pool is at capacity and, often unsupervised, in the evenings.

4. ENVIRONMENTAL CONCERNS AT SHEEP'S GREEN

Sheep's Green and the surrounding area is valued for its wildlife and a popular place for many different forms of recreation. People access it by car, cycle and on foot. There is concern that a designation would draw in even more people and add to the pressure on existing facilities. Water quality in the Cam overall is 'moderate' but little is currently known about the bacteriological health of the River here. Local Nature Reserves are important for diverse species and people cherish the iconic meadow landscape with cows.

5. POSSIBLE ALTERNATIVE LOCATIONS TO SHEEP'S GREEN

Several possible alternative locations have been suggested. Grantchester Meadows is popular but also sensitive to over-use. Snobs' Stream was where children learnt to swim before the Learner Pool was created and the former Ladies Bathing Area by Sheep's Green may be another alternative or extension. The river adjacent to Jesus Green and further downstream to Ditton Fields are further suggestions.

6. PRACTICAL MANAGEMENT REQUIREMENTS

A programme of water testing to monitor water quality would be needed, ideally throughout the year. Any desilting should be done with regard for biodiversity. The risks from underwater obstructions and broken glass on the banks or in the river would need to be minimised. Lifeguards are unlikely to be necessary if people follow basic advice. Transport implications and management costs should be assessed carefully.

7. PROCESS CONSIDERATIONS

The amount of work needed to prepare a proposal for a designated bathing area that is likely to be approved should not be underestimated. Information on the number of swimmers and evidence of local consultation are important. Local councils and the Cam Conservators would need to be closely involved. Respondents provided links to a wide range of relevant sources of further information and advice.

1. PRINCIPLES AND OBJECTIVES

1.1 Improving the environment

- The continued urbanisation of Cambridge and surrounding villages brings with it increased volumes of water abstraction and wastewater, and increased demand for recreational activities and space on the river.
- Action is needed to improve water flows and water quality (by tackling pollution from treated wastewater, sewer overflows and agricultural run-off) in the entire upstream catchment area of the river and its tributaries.
- Longer serving members of the Canoe Club remember when the water was considerably clearer and ran with more volume than it does now, even through the summer, so we agree that action is now long overdue.
- I've been a member of the Canoe Club for over 10 years and during that time I have noticed a lot of worrying changes to water level, quality and generalised pollution.
- Sewage treatment plants and sewage management practices are antiquated and much needs to be done to curb practices of sewage discharge into our rivers - including the discharge from Haslingfield into the River Cam.
- Given the single most contributing factor to the quality of water within the Cam is governed by the quite staggering volume and frequency of discharges from the Haslingfield sewage works, then tackling this at source through enforcement or naming and shaming would have the greatest contribution to raising the water quality.
- The City and District Councils and Environment Agency should be much more ambitious in protecting the green spaces of the Cam, improving water quality along the whole river from Grantchester to Waterbeach and making the river safe for all users.
- Though generally good and well managed there is great scope for returning some of the heavily modified stretches of river to more natural states that would support more biodiversity and provide greater ecological services such as flood protection and improved water resources.
- The more that people walk beside the river, swim in it and undertake leisure activities in and by it, the more these services will be valued and so the easier it will be to coordinate activities between the water companies and land owners (farmers and developers) to take more integrated approaches to catchment management and increase the natural capital and ecosystem services available to all.
- We would definitely be in favour of keeping the river healthy for the benefit of the environment and other river users.
- It remains disquieting and disturbing to think about swimming through the winter when large regular amounts of sewage discharges into the Cam. This is very bad for swimmers and not acceptable ecologically. It is unsustainable because of plans to build more houses and undesirable because no-one would choose to swim in water polluted with sewage.
- It is my first concern that the River Cam is restored to its former good health. I want this river to be healthy and to be in a fine condition: it is beautiful to look at, wonderful to swim in, and is an asset. It has served this City well: as a tourist attraction; as a local amenity for swimming, for punting, to walk alongside, to sit next to, to draw and paint; and, historically, as the life blood of trade and commerce.
- The river Cam, Sheep's Green, Paradise and Grantchester Meadows are an increasingly important and popular part of Cambridge's appeal to residents, national and international visitors.
- The interaction of livestock, water meadows, river life and the Ancient Architecture of the city are a world class example of what can be achieved with thoughtful and considerate urban planning and development incorporating natural systems.
- It has taken hundreds of years of intelligent design to evolve this system in Cambridge but it can serve as an example to good urban development worldwide and, most importantly, to newly developing areas of Cambridge city itself such as the South West Cambridge developments that may adjoin these areas.
- These currently somewhat bleak sites of open arable and canalised ditches could grow to provide further extensions of healthy meandering brooks, pools, water meadows and woodlands next to

housing and community facilities for people living with the river, bringing better living and lifestyles to many in the future.

- We should not be scared of our ability to change the landscape for the better and to help more people to live in well planned communities. As the wealth of the growing city grows so the city must invest in the systems that make it so attractive and so attract international investment and talent, this will keep Cambridge moving forward as a world beacon for learning, technology and culture for centuries to come.
- It all starts with appreciation of the river and its beauty right here in the city. There is no better perspective to see this from than eye level swimming in the water.

1.2 Improving opportunities for wild swimming and other water recreation

- Swimming in unheated water is possible at Jesus Green Lido but this is not open year-round and, when the weather is hot, even this large pool cannot cope with local demand. Having a designated area suitable for river bathing by dedicated swimmers in Cambridge who swim year round would be an improvement.
- The River Cam is a hugely important leisure amenity and it would be wonderful if it could be cleaned up to make swimming there safer again.
- Clubs whose core activity revolves around the use of the river, welcome any proposal to improve the quality of the water within the River Cam.
- Wild swimming is an increasingly important form of exercise and it would be wonderful to be able to encourage river swimming more wholeheartedly.
- Swimming in rivers is here to stay in this country and one day we will see it as a norm.
- Cold water swimming relieves depression and soothes arthritis.
- The huge number of people enjoying Grantchester Meadows this summer and the way that Newnham Riverbank club has become so oversubscribed is evidence of the demand for wild swimming.
- Many Cambridge University club members enjoy open water swimming, and its popularity has risen over the past year with pool closures leading to more swimmers than ever training in lakes, rivers and the sea.
- Having information about water quality would be invaluable for Cambridge University club members looking for a safe place to train and also provide reassurance to those looking to try open water swimming for the first time.
- It would be a real asset to be able to swim at Sheep's Green more safely. It is so important that we are able to exercise safely outdoors, particularly during the Covid pandemic.
- Improvements in water quality would benefit not only swimmers but other users who fall in the water accidentally (from paddleboards and boats of all sorts) or deliberately (e.g. when practising capsizing drills in canoes and kayaks).
- Getting the community more engaged with the river, achieving bathing water status and re-assuring the community that swimming in the river is a generally safe and healthy activity will bring wider benefits to the community, encourage investment and direct greater attention to achieving better ecological management of the River Cam catchments.
- This initiative would help to improve water quality and re-instate an aspect of local social history (my dad remembers people swimming at Sheep's Green).
- I learnt to swim in the Cam near Sheep's Green and I used to enjoy the annual 'Swim through Cambridge race'. I first participated at the age of 7 when I was the youngest contestant.
- Recognition of wild swimming's history and its resurgent popularity, and of Sheep's Green as a popular and historic bathing place, is very welcome.
- I've been swimming regularly in the River Cam for more than 20 years, most of those years all year round. I know a significant number of other people who use the river for swimming. In the summer, quite often people will swim off Grantchester Meadows; or while punting down the river, will jump off the punts and into the water. At Newnham Riverbank Club we maintain simple facilities to help people get into and out of the water, with hundreds of people swimming there during the course of the year, both club members and visitors.

- I totally agree with the many friends I've made thanks to swimming that the Cam provides such a blessed opportunity to get a feeling of nature in the middle of an urban area.
- Today, I swam from Grantchester to Sheep's Green. It was magical, it was a pleasure to see the riverbank from that perspective. Getting up at Sheep's Green was easy thanks to the ladder and my towel was still there, along with the bicycle.
- I have missed a few days only per month to swim since starting at the end of September. The positive effect this has on my spirit is invaluable. Even though my skin is sensitive, and I swim without a wetsuit, there have been no rashes or other problems so far.
- Even people who don't swim will benefit from clean wild waters; to do our best for achieving bathing status is being responsible about the nature that supports us all.
- My grandfather used to enter swimming competitions in the Cam before and after the First World War. They used to dive in from punts and he won quite a few prizes. So bringing more river swimming back would be wonderful.
- I swim in the River Cam every day all year round, at the Riverbank Club, Grantchester Meadows, and Sheep's Green. For peace of mind for health and for safety reasons I would truly welcome Bathing Water Status being achieved.
- A return to people having more wild and natural interaction with the river and nature is to be encouraged and there may need to be additional support to get people less familiar with such environments to appreciate their own responsibility for understanding and managing risks involved.

1.3 Safeguarding the health of swimmers in the Cam

- Evidence is needed to show that bathing water quality at Sheep's Green is poor.
- Do the discharges referred to on the Rivers Trust map occur at other times than after heavy rain, and are they not diluted sufficiently in their long travel downstream to Sheep's Green?
- The Urban *et al* study quoted examined locations from Byron's Pool downstream to below the city. Its findings do not specifically show that there is a problem in the Sheep's Green area. It states that the Cam is: "*... a waterway which faces regular public health problems: local rowers and swimmers often contract waterborne infections...*".
- Is there actually evidence of incidents of sickness and diarrhoea being common or that waterborne infections are "*often*" contracted? My understanding is that it is extremely rare for swimmers to experience this anywhere, including in the upper Cam.
- I am now a GP in Cambridge and I regularly see people who are worried they have caught infections from the river water.
- Swimmers itch may have become more prevalent (although one kayaker reports no problem upstream of Jesus Lock).
- Goose faeces (all along the hard standing on the riverbank) can transmit zoonoses like salmonella, chlamydia and psittacosis.
- Weil's disease (Leptospirosis) is a serious concern. The area has a very large rat population, something that is constant battle for the Canoe Club. We risk assess and have the facilities to make sure all cuts or abrasions are cleaned with clean water promptly and first aid applied. Wild swimmers do not have immediate access to clean water, and unfortunately the area is often covered in broken glass from beer bottles. Cuts to the feet from submerged objects and stones/glass on the bank in an area of river water abundant with rats is a real risk.
- Cambridge University Canoe Club have noticed the water quality deteriorate and have seen potentially higher levels of sickness than in previous years.

1.4 The need for a designated area as such

- Designating bathing places for coastal waters had a very significant impact on improving Britain's coastal waters.
- The impact of designation on the quality of inland rivers is unknown, as the Wharfe in Ilkley gained this status the status less than two months ago, and has yet to be monitored.
- There should be clear evidence that there is a problem affecting people at this specific place.
- Are there enough people using this place to meet the requirements of the designation procedure?

- The fact that people swim in the river, whether or not it is a designated bathing place, should be enough to require polluters to desist.
- The Cam is a highly significant river (both environmentally and socially), so should be subject to stringent levels of cleanliness and biodiversity even if no-one swam in it.
- The overriding priority, not only for this stretch of the river but along its whole length, should be to improve water quality, so that everyone can wild swim safely wherever they like.
- If all the river water was clean and safe there would be no need for designated areas.
- We should not have to create a designated bathing area to secure the aim of cleaning up the river.
- Is there any way to improve the water quality without needing a designated bathing area, or is this a means to helping with this in the long term?
- The creation of a designated bathing water will put pressure on various bodies to monitor and improve river water quality.
- Bathing water designation may, by leading to improvements in sewage treatment, help to improve ecological water quality but it is human health, rather than ecological health, that is the primary focus of the designation.
- If people want to swim in the Cam that's up to them and let them carry on as they wish, as has happened for decades.
- If the whole river is clean, people can wild swim where they like, as they always have.
- We are eager to restore the health of the river but deeply concerned that choosing one small point on the river could do more harm than good.
- All a swimming zone will achieve is potential overcrowding and anti-social behaviour in an area opposite a nature reserve and a place where people go for peace and quiet in one of Cambridge's beauty spots.
- Care should be taken not to imply that designated sites are safer than other places; the unintended consequence can be to concentrate swimmers in one place when they could equally safely swim elsewhere.
- River swimmers will always be motivated to want to protect and defend the river that we swim in. We experience the river as closely as it is possible to, and observe its changes of character, wildlife and vegetation over the course of the seasons. Designation of stretches of the Cam for bathing will in my opinion help to ensure that the water quality is monitored and its ecological diversity safeguarded.
- Negotiating a process to display a few signs regarding the bacterial quality of the water for worried swimmers may not seem a dramatic progress but capturing people's imagination and engagement with the river is what is needed to justify efforts by those in various levels of local government and commercial operations to invest to meet demands for a cleaner and healthier river as part of a whole ecosystem.

2. CHALLENGES - MANAGING POTENTIAL CONFLICTS

2.1 Statutory controls

- The Cam Conservancy is the statutory navigation authority for vessel traffic for the River Cam from Bottisham Lock to the Mill Pond in Cambridge. All vessels using this part of the river must be licensed by the Conservators. This includes canoes, kayaks and paddleboards. The Conservators must act in the best interest of the navigation.
- The Conservators' mission is to: maintain the River Cam between Mill Pit and Bottisham Lock in a good navigable condition; strike a balance between the needs of all the river users and riverside landowners and residents; and manage the river in a manner sensitive to environmental interests.
- The Conservators have byelaws that also cover the upper river from King's Mill and Newnham Mill to Byron's Pool and Grantchester Mill, together with their backwaters.
- The Conservators have designated the upper reaches of the River as suitable for swimming, specifically a stretch of some 4 km between Byron's Pool and King's Mill Weir.

2.2 Regulating swimming

- Cam Conservancy Byelaws currently allow swimming at any point between Grantchester and Sheep's Green, at any time of day and through all seasons, and many hundreds of people take full advantage of this.
- Designating a specific area, especially if lifeguards are provided, may lead people to believe that swimming outside the 'supervised' timings or location is forbidden and dangerous.
- A litigation-fearful council might declare that swimming is permitted only at the 'official' designated bathing area and during particular hours or times of year.
- Wild swimmers swimming at Dead Man's Corner have been shamed as 'selfish idiots' on social media for supposedly putting extra pressure on the NHS because of the possibility of needing to be rescued!
- The impact of 'designated bathing' status on other rivers, and any resulting negative impacts, should be assessed.
- Wild swimming should be an activity regulated only by individual risk assessment and the community of swimmers, not council red tape.

2.3 Conflicts with the Learners Pool on Sheep's Green

(a) General concerns

- The Learner Pool has become increasingly popular since the Friends group took over. In 2019, timed-entry slots were needed for a significant portion of the summer because of the number of children wanting to swim.
- There is a concern that, with more people attracted to the area, children that cannot gain entry to the pool will be tempted to swim in the river, as happened when they were turned away in the summer of 2019.
- Much of the infrastructure available to swimmers in the photo from the 1970s is no longer in place, but even in those days the photo suggests there was a clear preference for the Learner Pool over the river!
- While a designation may make the river cleaner (we hope!), when the river adjacent to Sheep's Green is busy, it is not an easy place for swimmers, and especially children.
- Inept punters, canoes and small heads bobbing in the water don't mix very well.
- In 2020 it was noticeable that swimmers increasingly resorted to swimming off Paradise, with its more sheltered bays, after Scudamore's reopened, and this put significant pressure on the Nature Reserve.
- The requirement to put up an 'advice against bathing' sign, if the water quality is poor, runs the risk of putting even more pressure on the Learner Pool if the water quality dips.

(b) Contamination of the Pool

- Greenwich Leisure Ltd (branded as 'Better') manage the outdoor paddling pools, Jesus Green Lido and the Sheep's Green Learner Pool. The Learner Pool is open from May to September.

- GLL try to avoid any cross-contamination of Pool water with river water as a result of children and younger adults coming in to the pool area after swimming in the river. This is not acceptable or permitted.
- This problem has become slightly easier to manage since the position of the entrance gate was swapped a few years ago.
- Active encouragement of swimming from the river bank may make more acute the issue of hopping from one body of water to another, unless part of the proposals included the provision of external showers?

(c) Lifeguard services

- GLL provide a lifeguard for the Learner Pool as it is 1 metre deep throughout. Their focus has to be solely on the pool and gated area. If the designated bathing area includes the River directly outside the Pool, the public are likely mistakenly to view the lifeguard as being responsible for sorting out any people who (often) mess about in the river, for rescuing people from the river and providing first aid.
- The Pool environment is controlled in terms of numbers, water quality, parent/guardian supervision and lifeguard training in a pool water environment; this does not apply to swimming in the river.
- Thought should be given to who will use this area, how use will be controlled, and what provision will be made to ensure the safety of the bathers, including the provision of lifeguards.

2.4 Conflicts with the Canoe Club

- The Cambridge Canoe Club, founded in around 1978, based at the old Basket Store building since the early 1980s, is the largest Canoe Club (by membership) within the country. It has produced one Olympic games sprint paddler, one freestyle world champion, and a good number of Premier Division slalom paddlers.
- The Club's diverse membership covers just about all aspects of canoeing: white-water paddlers, sea kayakers, touring boaters, recreational paddlers, along with families, and a thriving junior section
- The Club is open for paddling at practically all times of the day and night and the area outside of the Club is intensively used by members as a base for their activities throughout the year.
- The Club has played a key role in clearing floating pennywort and in removing general litter and rubbish, more frequently during the summer months and when the river is used intensively.
- The Club funded the addition of two new sets of steps on the river bank about five years ago, to supplement older sets that were getting towards the end of their useful life. These benefit not only our members but other river users.
- The Club has supplemented the City Council's grass cutting with weekly cuts outside the Club during the summer (to prevent long wet grass cuttings from getting into the changing rooms and clogging up our shower drains) but also to the general benefit of river bank users.
- The defibrillator was provided by and is maintained by the Canoe Club as its contribution to the wellbeing of people in this recreational area. Canoe Club coaches are trained in using it as they are likely to be first on the scene for first aid incidents around this area due to the amount of time they spend there.
- The Club would not wish to see any canoeing demarcation zones restricting areas in front of the Canoe Club, or the river bank for canoeing activities.
- At peak times of demand and use of the Club over the warmer months, it's not uncommon for a number of formal coached training sessions or courses to be taking place concurrently, along with our recreational members. We have always managed to co-exist with other users, without constraints or formality. Which raises the question of who would police or enforce such restrictions?
- With the increased popularity of inflatable canoes and stand-up paddle boards, there has been a marked increase in the number of individuals, families or groups meeting in the Lammas Land car park and using the river bank as a launching point. As a Club, we therefore have no control or jurisdiction over these individuals, and indeed question if they have paid the appropriate fee to the Cam Conservators for a valid river licence.
- Use is all very informal with many people swimming at Sheep's Green there using the steps of the Canoe Club, the benches outside it, the covered area of the Learner Pool, Hodson's Folly, Paradise

Nature Reserve or the island opposite the Canoe Club to get changed and leave their clothes. If the area were to be designated as a bathing area, would more formal rules/procedures have to be in place?

- In summer 2020, the whole area got extremely busy with other users: paddle boarders, canoe and rubber dinghy users ... a lot of leisure activities, fishermen and serious elite watersports from the Canoe Club. Canoe Club members were “cheerfully tolerant” of swimmers but numbers were rarely more than 5 or 6 at any one time. With the increase interest and involvement in open water swimming because of the closure of indoor pools, the proposed designation as a Bathing Area may generate crowd problems. How would this be managed?
- The Cambridge Canoe Club has over 400 members. Even if only a quarter of them turned up at any one time, the grassy area in front of the Club House at Sheep’s Green would be full of canoes either waiting to go out or drying off on their return.
- Currently the only area with suitable access for river swimming is from the stretch of river bank in front of the Club House of Cambridge Canoe Club. This area already gets very overcrowded with family groups and swimmers during hot weather.
- Unless further areas adjacent to the river bank are made available for swimmers there is the potential for serious bather versus canoeist conflict. The area is just too small.
- The Canoe Club run courses throughout the year from directly in front of the Club House to introduce beginners to canoeing and teach rescue skills and water safety. Canoe/swimmers mixing is not a happy or safe combination.
- Encouraging swimming would make it more difficult for coaches effectively to help beginners learn a new sport at the Canoe Club (including disabled people, disadvantaged youths with severe learning difficulties, girls with confidence issues, children and adults of all ages (even in their 90s!).
- Racing boats can feel quite unstable to beginners and there are usually multiple capsizes in the first few sessions.
- Coaching takes place from the side along the paved area between the Fen Causeway bridge to the end of the Learner Pool railings. The two coaches can then see all of the six participants between us.
- Doing this outside the club enables access to club facilities if someone gets too cold or needs the first aid facilities. It also enables us to help our participants get in and out of the boats (and out of the water if they capsize) as well as helping them to empty waterlogged boats from the side.
- The area outside the club is used a lot for club activities, particularly with beginners and the kids club. It is not just a place for club members to get on and off the river, and this is why we have invested heavily in public facilities like new flippers for the sluice, extra ladders out of the water and the defibrillator.

2.5 Anti-social behaviour

- Lack of respect and tolerance between different water users of the river is a concern (e.g. canoeing access above Byron’s Pool and punts and swimmers in too close a proximity on Grantchester meadows).
- Fun can degenerate into anti-social behaviour at times e.g. ‘bombing’ punts from the river bank and bridges.
- ‘Bully’ youths can crowd around novice kayakers launched from the Canoe Club.
- The City Council do not do enough to stop children using the Learners Pool when there is no one there to supervise.
- Children break into the Learners Pool after hours (requiring the police to be called).
- Children risk injury by climbing up on the roof of the Learners Pool to jump into the shallow pool from height.

2.6 Other potential conflicts between users

- There may be potential conflicts with angling and river use for fishing in the immediate vicinity.
- The public footpath is immediately adjacent to the river bank at Sheep’s Green and is well used by members of the public taking a riverside walk – to Paradise , but also to and from the Lammas Land car park.

3. USER SAFETY CONCERNS AT SHEEP'S GREEN

3.1 Swimmers and boats

- Boats with whirling props and rowers hurtling down the river backwards tend not to mix well with swimmers.
- Punts poled by an inexperienced tourist entering an area with swimmers milling around is a real risk. Most swimmers would get out of the way easily but an incompetent youngster might flounder, get hit on the head and drown.
- Scudamores indicate that 40-60 punts and up to 25 canoes/kayaks on the upper river in the summer may each make several trips a day. The most common hire length is around 1.5 hours which is sufficient to get to the end of the tree lined section of Paradise Nature Reserve and back. If swimming density and numbers of trips both increase in fine weather, with 80 punt trips alone on a fine Saturday peak period there would be 160 passes along Sheep's Green between say 0900- 2100; one every 4.5 minutes on average and more at peak times.
- At Sheep's Green, given a depth of 1.8 metres by the edge and 2.1 metres just 2 metres out from the bank (last week's readings), poor swimmers would find it difficult to use the river, but if some are thrashing about having fun, a punt passing by every five minutes or so is definitely a risk to be judged and would suggest that only competent swimmers should be entering the river there.
- Far fewer punts reach Grantchester Meadows and swimmers there may be more competent than some using Sheep's Green.
- It would be unsafe to encourage bathing in an area already congested with punts , canoes and paddle boards.
- The Cambridge University Canoe Club would wish to ensure that this is a safe and practical place to continue to enjoy paddling. We are always accommodating of other river traffic and watch out for bathers.

3.2 Safety of swimmers in general

- The Bathing Water Regulations cover water quality but not physical safety, which is part of the local management of the site.
- Only competent swimmers should be encouraged to swim in the river.
- It is not a safe place to choose to encourage open water swimming - it is really very deep along that stretch, and although there are steps in place, for a less than confident swimmer, there is no shallows to stand.
- Measures are needed to make river swimming at Sheep's Green safer than it is at present.
- Water sports are dangerous and you will not be able to provide someone to supervise the area 24/7 so to my mind it is reckless to encourage people to free swim in this area.
- Pre-COVID a number of the racing kayakers would be kayaking from the club most evenings, all year round.
- Labelling this area as a bathing area will make people assume it's safe to swim there, but all watersports are 'assumed risk' sports that could result in drowning.
- At the Canoe Club we try to minimise these risks by ensuring everyone wears the correct safety equipment: Club members (other than division 6 and above racers) must wear a buoyancy aid, which the club can provide.
- Club-organised group activities are always supervised by an appropriate number of coaches (generally 1 coach to every 8 participants) and people joining the club are taken through an induction process where they have to prove that they are able to capsize from a boat and swim to the side with it.
- If our coaches do not feel a particular adult is safe to paddle on the river in a peer group without a coach they are signposted our one star courses before they are allowed to join the club. One extra lifeguard at peak times probably isn't going to offer the level of safety cover required.
- The river wall at Sheep's Green can be quite high. You often have to clamber down a rusty iron ladder.
- People swim at their own risk and would not expect to be supervised. Funds could perhaps be better used in providing basic safety information for those people less familiar with swimming than in considering lifeguards.

- It would be sensible to promote safe swimming – swimmers often bring their own floats or wear a brightly coloured cap, which makes them easier to spot so canoeists can give them enough space. There is plenty of room for everyone on the river as long as everybody does their best to accommodate each other.

3.3 Safety of children in particular

- There is a concern that with more people attracted to the area, children that cannot gain entry to the pool will be tempted to swim in the river, as happened when they were turned away in the summer of 2019.
- When the river adjacent to Sheep's Green is busy, it is not an easy place for swimmers, and especially children. Inept punters, canoes and small heads bobbing in the water don't mix very well.
- In 2020 it was noticeable that swimmers increasingly resorted to swimming off Paradise, with its more sheltered bays, after Scudamore's reopened, and this put significant pressure on the Nature Reserve.
- My main worries are based around safety for children. The water is deep in this area and it is not very clear so it is difficult to see if someone has gone below the surface.
- A lifeguard would struggle to observe the whole length of the river that you have highlighted and there are some shrub and tree barriers which would occlude viewing.
- What qualifications would a lifeguard need for a *river* setting (not as straightforward as getting a *pool* lifeguard)?
- Where would liability land if someone were to drown while a lifeguard was on duty?
- The main issues occur between 6-9 pm once the learner pool is closed and most of the adults with smaller children have gone home. Many unsupervised 10-15 year olds (and possibly younger) swim in the river. They also climb over the fence to the learner pool.
- There is a concern for the safety of these children from both a safeguarding and a water safety aspect.
- Children can be easily pressured by their peers into swimming when they are not particularly confident swimmers.
- Drowning is often not obvious - the previous fatality occurred on a really busy day and many other people were on the water at the time it happened, but none saw him go under or were able to help because when people panic they don't flail their arms around, they just go stiff and slip beneath the water.
- Growth of very long river weeds in summer can pose safety risks: 6-8 years ago a teenager swimming with his friends one evening became tangled in the weed and drowned.
- A child drowned outside the canoe club some years ago. It was impossible to find him in the water, particularly because the children that were with him were so hysterical that it was difficult to get information out of them.
- On occasions a kayaker has had to help pull children or drunken teenagers out of the river in this area.
- From experience I know how dangerous what you are suggesting is likely to be. It will also probably be someone like a coach who has to suffer the trauma of dealing with the next drowning in that area.

4. ENVIRONMENTAL CONCERNS AT SHEEP'S GREEN

4.1 General pressures on the local area

- If just one part of the river is designated and promoted as the 'swimming' area, there is a danger of too many people swarming there, especially on the hot days, fighting for space with the extra canoes, paddleboards, etc.
- If Sheep's Green is marketed as a great destination for families - this would not just attract more locals to come to Newnham from other parts of the city, but also be a draw for families from out of town, with the resultant pressure on car parking nearby.
- We do not need one small part of the river singled out as a 'Destination'. Clean river YES, a Newnham Lido NO.
- Newnham experienced catastrophic invasion of footfall, cycle traffic and cars last spring and summer, as people visited the Meadows. To invite the same at Lammas Land would be to overwhelm the parking, clash with the children's playground, interfere with the cycleway and provide a toxic mix of punts, paddleboards, canoes and swimmers in the river.
- Success could lead to an overuse of a not very big area with a knock-on effect on the locality.
- The Sheep's Green, Lammas Land, Coe Fen and Paradise Nature Reserve areas are very busy recreational areas criss-crossed by a number of well used cycleways and footpaths.
- Sheep's Green and Lammas Land are protected green spaces; creating a destination with a designated bathing area would funnel large numbers of people on to these environmental oases for sunbathing and picnicking.
- Access to the area is already congested via small/narrow roads, limited car parking space and well used cycleways and walkways.
- The Lammas Land Car Park is already full in the summer months; more people driving over for a swim would soon cause overflow.
- Established Friends groups seek to manage the area, with the City Council, reflecting the different uses.
- The area from, and including, Grantchester Meadows to the Mill Pond is already well used and congested all year round - and especially in the spring, summer and autumn. Additional pressure would not be compatible.
- There would be significant competing uses both on, and close to, the river (large numbers of punts, the canoe club, the swimming and learners pool, fishing activities, more casual users enjoying the wildlife and environment, visitors to the Park with its extensive play equipment, paddling pool and café etc, walkers and cyclists).
- A new swimming area would most likely result in additional physical facilities, buildings (changing rooms, toilets etc) and access points all of which would adversely impact on the natural environment, riverbank and wildlife.
- There are no changing cabins other than at the Learner Pool which are patently not suitable.
- Hodson's Folly is a historical monument and we would strongly oppose any building of facilities for bathers there, as this would be detrimental to the monument and to the beautiful views from the Paradise Nature Reserve.
- The additional activities would change the character of the area rather than preserve it.
- There are other areas where swimmers can enjoy the river, where there are fewer people, and do so at the moment.
- The previous river swimming years ago with the men's opposite the canoe club and the women's the other side of the footbridge was closed down because of competing uses on the river and safety issues.
- Adding additional traffic to the area will place an unfair burden on the Canoe Club volunteers who currently keep the grass and site outside the club a pleasant place.
- The public toilets near the paddling pool are hardly fit for purpose at present, let alone catering for larger numbers.
- Supervision, life guarding and ensuring safety would be a major challenge for the City Council.
- Cambridge has doubled in size since Sheep's Green was last a popular swimming location. 50 years ago, locals would have travelled there by bike or walked. Today, however, official designation would draw people from a much larger city, and from further afield too, bringing traffic and related air pollution.

- A designated bathing area should provide adequate parking, toilet facilities, a café and lifeguards. These facilities are either inadequate or absent; providing them would have a hugely detrimental effect on the delicate ecology of the area. The Lammas Land car park is small, and is already at capacity with shoppers, walkers and canoe club users. The Driftway access road is a busy cycleway, only wide enough for single lane vehicle traffic and often already log-jammed. Proposals to expand roads and car parks or add buildings on this site would be opposed.
- It is also a sad reality that large crowds would leave litter, which is harmful to the cows and wildlife. Last year a young heifer died after swallowing a plastic bag in the river.

4.2 Water Quality

- Environment Agency Water Quality data for the Cam in 2019 are shown in the Table below.

| Classification Item | Classification 2019 |
|--|-----------------------------|
| OVERALL WATER BODY | MODERATE |
| ECOLOGICAL | MODERATE |
| Supporting elements (Surface Water) | Moderate |
| Biological quality elements | Good |
| Hydromorphological Supporting Elements | Supports Good |
| Physico-chemical quality elements | Moderate |
| Specific pollutants | High |
| CHEMICAL | FAIL |
| Priority substances | Good |
| Other Pollutants | Does not require assessment |
| Priority hazardous substances | Fail |
| Source https://environment.data.gov.uk/catchment-planning/WaterBody/GB105033042750 | |

- Note that the apparent deterioration in water quality with a chemical fail in 2019 instead of the previous many years of good status is purely as a result of new reporting and assessment criteria to cover a wider range of agrochemicals and does not indicate any “real” change in the water quality.
- The high phosphate levels and occasional incidences of trace chemical substances (PFOS and PBDE) are of no direct concern to swimmers. These can be tackled with modified land management practices by farmers, improved treatment levels by the water companies and changes in consumer chemical usage.
- There is nonetheless much that could be done to make the water better. A comprehensive assessment should be made of the threats posed by each of the many wastewater discharges upstream and of runoff from farming and other activities. These should be considered for both wet weather and dry weather conditions and seek opportunities for enhanced management of the chalk aquifer as well as surface discharges that may help a return to more natural Chalk stream flow conditions.
- It is hoped that the bathing water designation and the regular bacteriological monitoring that this will initiate will help in better understanding any water quality risks that may be of concern to swimmers and can be used to build support for investments that would lead to further improvements in the health of the river and the catchment.
- The water's pretty filthy and probably contains a lot of agricultural run-off. How can the water in this particular part of the river be cleaned, bearing in mind that canoeists and punters are churning up and down the river all the summer?
- The aim should be to maintain bathing quality water all year round, not just in a ‘summer bathing season’ since many user groups of the river actively use the river all year round.

- A possible concern is the discharge to Hobsons Conduit via a surface water sump at Addenbrookes hospital. Water from the Conduit goes into Vicars Brook particularly when flows are high and would discharge into the Cam just upstream of Sheep's Green. A misconnection at this complex site might mean that biohazards ended up in the river. If biohazard monitoring of the sump has not now been put in place, this should be checked.

4.3 Biodiversity

- The Paradise, Sheep's Green and Coe Fen nature reserves are all already under threat from increasing footfall, disturbance, light pollution and noise. The feral white geese have abandoned the triangle because of disturbance.
- Total destruction of the bankside emergent vegetation at Grantchester Meadows by punters and swimmers during intensive use removed emergent plants that damselflies use to complete their transformation from larva to adult. Despite numerous attempts it was not possible to find the White legged damselfly, a rare species with a very scattered distribution in Cambridgeshire, first found there in 2019.
- Paradise Nature Reserve, opposite Hodson's Folly is an invaluable asset, not only to the local community but also to scientists doing research, the whole city, and the wider public.
- Untold damage is likely to be caused to Paradise Nature Reserve, opposite the former Ladies Bathing area, by large numbers of bathers, picnickers, and sunbathers on the very edge of the Reserve.
- Its biodiversity, peace and tranquillity would be threatened by a bathing water designation at Hodson's Folly.
- The Reserve is already at environmental capacity. Increasing footfall would add to already considerable disturbance, noise, litter and pollution.
- A bathing area would also attract night swimmers and parties with more noise, and light pollution which disturbs bats and insects.
- The river bank of Paradise is fragile and vulnerable, easily damaged by bathers getting out to sunbathe and picnic and to light barbecues, thus destroying the habitat and the wildlife.
- The river at this stretch has swans, geese, coots, moorhens, kingfishers, little grebes and goosanders. Swans regularly nest along the banks and need protecting. Nesting birds nearby include blackcaps, chiffchaffs, woodpeckers, tawny owls, and warblers. Butterflies along the banks include marbled white, Speckled wood, Commas, Brimstones, Peacocks and Orange Tips. The range of flora and fauna is immense, and the Butterbur (*Petasites hybridus*) which grows on this bank has been there for at least 400 years.
- Iconic Red Poll cattle graze on the green spaces along this stretch of the river and would come under threat if there was a designated bathing area. They are a much loved and essential part of the ecology of the area, providing a vital food source for the many bats which are protected and which roost in Paradise Nature Reserve.
- Sheep's Green would attract far larger crowds than at any time in the past, to what is an environmentally-sensitive water meadow, grazed by cows which have been a critical part of this finely balanced ecosystem for centuries. The cows kick up ground which allows wildflowers to seed, prevent larger plants from establishing and fertilise the soil. It is likely that authorities would decide that the cows should be removed.

4.4 Landscape

- We are hearing citywide concern that this will endanger unique medieval green spaces, described by the landscape architect Tom Turner as equivalent to the best art in the Fitzwilliam Museum.
- Residents are asking if this bathing initiative relates to Natural Cambridgeshire's plans for a Cam River Park corridor, the proposals for Accelerator Parks and the Wider Cambridge Visitors Project.
- There are concerns that a bathing place at Sheep's Green could lead to the loss of the cows which are an intrinsic part of the ecosystem there.
- Cambridge commons losing their cows and with that their status as commons goes completely against all that the landscape architect Kim Wilkie said at the recent Friends of the Cam talk about a river landscape strategy and the role of grazed meadows in flood management.

- People have highlighted that Cambridge's famously *rus in urbe* style of cows on the meadows is admired all over the world.
- Allan Brigham, Cambridge's champion of the commons, wrote: *"Whichever way you approach Cambridge, you see grass, trees and lots of sky. The college gardens, parks and commons bring nature right into the town. Cows graze on Midsummer Common just five minutes' walk from Marks & Spencer – and in the summer office workers and students eat their lunch beneath the willows trees that line the river at Coe Fen. At weekends Jesus Green becomes a giant playing field with games of every kind – from skateboarding to lacrosse. These spaces are vital to people's wellbeing...It's easy to take Cambridge's open spaces for granted. But ... the protection of these spaces is, to my mind, just as important as the preservation of Cambridge's iconic buildings."*

5. POSSIBLE ALTERNATIVE LOCATIONS TO SHEEP'S GREEN

5.1 Grantchester Meadows

- The Conservators have designated the upper reaches of the River as suitable for swimming, specifically a stretch of some 4 km between Byron's Pool and King's Mill Weir.
- The Cam at Grantchester should also be included, as so many people swim there and use the river over summer (possibly more than at Sheep's Green?). The Grantchester-Cambridge reach is possibly about as long as the designated area in Ilkley.
- Grantchester Meadows, where the river is much shallower, is a much safer part of the river and popular with families.
- It would be better if ways of easily exiting the water (e.g. ladders or steps) were available there.
- Along Grantchester Meadows there are some banked/mud shallow areas.
- 2020 demonstrated how Grantchester Meadows have become 'the beach' for many people, with car parking, vandalism, litter and impacts on biodiversity all being major problems. Friends of Skater's Meadow Footpath are currently lobbying to reduce or stop access for cars at the Newnham end. So to increase use at Lammis Land would be good.
- Designation at Sheep's Green is highly unlikely to discourage people from swimming at Grantchester Meadows, a popular and also historic swimming place. If water quality is proved to be excellent or good at Sheep's Green, then it is highly likely to be similar at Grantchester.

5.2 Snobs' Stream

(a) The specific area

- This could be: that section of Snobs' behind the Canoe Club frontage; that section of Snobs' from its junction with the Cam to the end of the hard river bank and the path gate adjacent to the paddling pool; the area shown below (in 2017) before the City Council opened it up a lot downstream:



(b) Advantages of Snobs' Stream

- It would be ideal for children to learn there, just as they used to do (several respondents learned to swim there).
- It would provide an alternative learning area to the Learners' Pool, relieving pressure on the Pool at peak times on hot summers days when it will become a bit crowded with young swimmers.
- Could be viewed as an extension of the Learner Pool.
- It is a good depth for learner swimmers. It would provide a shallower alternative to the main river. The bottom may be paved.
- It would provide an alternative to the main river to avoid conflicts with punts and canoes.
- The triangle of land between the river, the stream and the bridges and cycleway has great potential for picnics and sunbathing as does the area on the other side of the cycleway.
- There is ample space behind for parents to watch their offspring in Snobs stream, picnic, sunbathe on the grass ...
- Being able to swim in a river rather than up and down in a swimming pool is a distinctive experience. From here one could swim from Snob's Stream under the low bridge and upstream into the Cam and then downstream past Hodson's Folly and under the footbridge and getting out at the bank just before the learner pool.

(c) Disadvantages of Snobs' Stream:

- It would probably be much nicer for children to learn to swim in the learner pool.
- This section is currently heavily silted from the old bathing place upstream to the main river and is also full of rotting tangled submerged tree branches and vegetation, rubbish from the car park and recycling bins.
- It would need careful, repeated (and hence costly) dredging to remove silt and debris (bikes, broken glass from bottles thrown in by picnickers, etc).
- This stretch is a favourite place for parents to encourage their kids to feed the ducks with chunks of white bread - not good for the ducks or for the water quality.
- Repeated dredging could be to the detriment of biodiversity (the tangled vegetation probably makes it good habitat for ducks and little fish have been seen there).
- Swimming under the low bridge, which is very dirty, would also be pretty unpleasant, especially when there are high water levels and hence very little headroom.
- It might be more dangerous than the main river to swim in due to overhanging bushes, branches, nettles and brambles and submerged branches.
- The site is now immediately next to the toilets, which makes it less attractive than it probably used to be.
- It might be better viewed as a future extension to the main river, to meet any extra demand once the main river has become safer and more attractive to swim in.
- It is a major launching spot for non-canoe-club-members who park in the car park, and then launch direct into Snobs' Stream, rather than carrying their canoe/kayaks/paddleboards over to the main river.
- Parasites etc from Mallards congregating between the Cam and this stretch might be concentrated in low flows and cause Swimmers Itch.
- The concrete edging would need to be regularly cleansed of droppings.
- It would not offer a 'wild swim' experience quite like the main river.
- The City Council would need to show that safety issues such as underwater hazards have been dealt with.

5.3 The Former Ladies Bathing Area

- This is a triangular piece of land bounded by the river footbridge upstream of the Canoe Club House and the footbridge over Snobs' Stream. The area borders the river across from Hodson's Folly and Snobs' Stream.
- The river frontage at Hodson's Folly is good but elsewhere the banks need attention and river steps would be an advantage for river access and egress.
- Family groups and bathers in this area would be close to the public toilets by the paddling pool on Lammas Land.
- This proposal would remove pressure on the small area by the Cambridge Canoe Club frontage.
- This a larger area than the proposed stretch with safe access for swimming, and room for picnicking etc.
- Moving the bathing area further up stream to goose triangle would help avoid interference with the Canoe Club's activities, and reducing the size of the area may help with safety.
- Conflicts with the activities of the Canoe Club might be reduced by encouraging and focussing swimming and sunbathing activities at the southern tip of Sheep's Green on the former site of the Ladies Bathing Place. This would require signage and more appropriate river edges and new steps. It is also slightly closer to the public WCs and refreshment kiosk, as well as the repositioned gate to the Learner Pool adjacent to the changing rooms.

5.4 Other possibilities

- The River adjacent to Jesus Green Pool: if a designated site is necessary, there are facilities at Jesus Green Pool that river swimmers may be able to use.
- Ditton Fields would be a more appropriate, safer and less congested area along the river.
- Byron's Pool was historically a bathing area.

6. PRACTICAL MANAGEMENT REQUIREMENTS

6.1 Water Testing

- The Environment Agency can provide any water quality data that they hold on request (request submitted) but any bacteriological data for the River Cam are likely to be extremely limited.
- The Environment Agency are responsible for statutory testing of water in designated bathing waters. The results are published on the Bathing Water Explorer <https://environment.data.gov.uk/bwq/profiles/>.
- The Environment Agency takes up to 20 water quality samples during the bathing season (15 May to 30 September) to check for intestinal enterococci and *E. coli*. If water is classified as 'poor', a sign advising against bathing will be displayed.
- The community should own the monitoring of our natural environment.
- Environment Agency monitoring should be supported by community-led monitoring to the same standards. This could be done in conjunction with the City Council, Universities, Anglian Water and/or others.
- Sampling should be daily initially then possibly weekly to establish a robust set of data.
- Monitoring should continue throughout the year, not only during the (summer) bathing season of May-September. This would pick up contamination as a result of flooding and spills in the wetter months.
- Monitoring should include nearby watercourses, not just the designated area to understand any differences and, where possible, help identify sources of contamination (e.g. Vicar's Brook, which enters the river just south of Lamma Land, is a major source of road/hydrocarbon contamination possibly from the Brooklands Avenue / Trumpington Road junction).
- The paper by Urban *et al*, referenced in the Forum's proposal, illustrates the range of bacteria found.
- Monitoring should include assessing risks from Weil's disease (Leptospirosis).
- Maintaining bathing quality water all year round should be seen as the aim of this exercise, and not just a 'summer bathing season' since many river user groups actively use the river all year round.

6.2 Desilting

- Desilting has to be done carefully and with regard to what the silt may contain. At almost any time of the year various stages of the lifecycle of many organisms may well be present in or removed with the silt.
- A better result can be achieved if the desilting takes place over a long period of time (several years) and only stripes of silt are removed leaving undisturbed sections between them.
- As long as only partial removal is undertaken, larvae from the remaining areas can recolonize the desilted sections. Unfortunately the suction pumps used for silt removal tend to Hoover up everything in their path.
- Dredged silt was traditionally spread on the adjoining water meadows. Carting it away by tanker has a high environmental cost. Barges could perhaps be used instead.

6.3 Local site management

- Careful thought needs to be given to what additional management work would be needed and by whom.
- Providing safe access to the water itself for swimmers (e.g. steps)
- Extensive work would have to be completed at the former Ladies Bathing area as the concrete slabs along the river side are subsiding and broken.
- Demarcating areas of the river to be avoided by punts to separate them from swimmers (e.g. by ropes and buoys)
- There are no facilities for bathers in this area. Paradise Nature Reserve already suffers from visitors using it as a facility and this problem would increase.
- The grass and site outside the club is largely kept pleasant by the Canoe Club volunteers. They cut the grass, clean the area of debris, and regularly (almost daily in the summer) clean the banks of goose excrement, as well as removing discarded litter (sometimes unhygienic) and broken beer bottles from picnickers, punters and groups of students that frequently congregate there.

- There are no changing cabins, other than at the Learner Pool, which are patently not suitable.
- The public toilets near the paddling pool are hardly fit for purpose at present, let only catering for larger numbers.
- Car parking is of particular relevance for the 'Southacre, Latham Road, Chaucer Road Residents Association' as we have the nearest unregulated roads for parking.
- Swimming should be restricted to early morning (up to 10 am) with no punts up to that time.
- The location for swimming might be better on the south side of the bridge but any changing facilities or other buildings there would have a greater negative effect on the environment than at the marked area.
- The river would need to be checked regularly for submerged objects.
- Community action to remove specific hazards from the river and to provide safety attention for swimmers on very busy days may be required.

6.4 Providing lifeguards

- Supervision, life guarding and ensuring safety would be a major challenge for the City Council.
- Lifeguards are not necessary. Although swimming obviously has risks, they are easily mitigated by people following basic advice. If lifeguards are used they must be properly qualified, should be proper paid staff and employed in line with guidance (e.g. from RLSS) on numbers etc. Not meeting these standards could give a false impression of safety cover that wasn't actually in place, which could be problematic for landowner liability.
- My understanding is that the designation would not affect liability issues because swimmers would still enter the water at their own risk.
- If there was an accident while a Council-funded lifeguard was present, there is a concern that the local authority might close down the site for fear of being held legally responsible. To avoid that risk it would be better not to provide lifeguards to supervise river swimmers.

6.5 Transport

- Ways to support (and invest in) sustainable transport to the location should be mapped out.
- This could include Bike schemes? Location close to the station? Increased buses from the city and station, and park and ride sites specifically catering for the designated bathing water status area in the summer?
- Cycle parking facilities (currently only a few racks at the cafe) would need to be upgraded.
- There should be a traffic assessment.

6.6 Costs

- Investments in upgrading sewage treatment works would be funded by Anglian Water through the five-year price review process (which could in turn impact on household bills).
- Local residents might object to any increase in Council Tax to cover the additional management costs that would fall on the local council.
- Any increase in revenue from visitors could help to fund any improvements needed for this designation.
- Improvements could also be funded through contributions to public funds from developers.

7. PROCESS CONSIDERATIONS

7.1 Work required in making an application

- There is a widespread lack of understanding of how much work is required under the existing procedures and how long it takes (e.g. counting the numbers using the water over the summer, preparing the application, consultation etc). It will require sustained effort from many people.
- Lack of understanding can also give rise to a mismatch between expectations and reality (e.g. the designation as such has a narrow focus on water quality and does not include how the bathing place is managed).
- An application will need to include information on the number of swimmers in the summer. The surveys will need to be organised so that counting can start from 15 May. The Ilkley Clean River Group found nearly 8,000 swimmers over their 20 best days (see below), only just enough to succeed, though the final designated area is slightly larger. Managing this counting process kept them busy for the whole summer and beyond.

| Top 21 High Use Days | | | | | | |
|----------------------|-----------------------|-------------|-------------|---------------|-----------------|----|
| No | Date | Day of week | Total Users | No Weekend/BH | No Holiday days | |
| 1 | 25th July | Tues | 1,751 | | | 1 |
| 2 | 23rd July | Thurs | 1,120 | | | 2 |
| 3 | 29th June (3.30pm) | Sat | 746 | 1 | | |
| 4 | 26th August | Mon (BH) | 732 | 2 | | 3 |
| 5 | 25th August | Sun | 657 | 3 | | 4 |
| 6 | 24th August | Sat | 568 | 4 | | 5 |
| 7 | 24th July | Wed | 468 | | | 6 |
| 8 | 29th June (1.30pm) | Sat | 342 | 5 | | 7 |
| 9 | 24th August | Sat | 318 | 6 | | 8 |
| 10 | 27th August | Tues | 288 | | | 9 |
| 11 | 4th August | Sun | 191 | 7 | | 10 |
| 12 | 8th August | Thurs | 109 | | | 11 |
| 13 | 21 st Sept | Sat | 123 | 8 | | |
| 14 | 14th July | Sun | 113 | 9 | | 12 |
| 15 | 5th August | Mon | 81 | | | 13 |
| 16 | 23rd August | Fri | 75 | | | 14 |
| 17 | 29th August | Thurs | 61 | | | 15 |
| 18 | 7th August | Wed | 48 | | | 16 |
| 19 | 1st August | Thurs | 48 | | | 17 |
| 20 | 13th August | Tues | 43 | | | 18 |
| 21 | 22nd June | Sat | 42 | 10 | | |

Count all the time and report the 21 high use days across the categories

ALSO provide the average of people in the water over the 20 days you are using

- I suspect that you would get these numbers in summer in that area? If in any doubt could the area proposed for designation be extended up to the end of Paradise Nature Reserve?

7.2 The role of local statutory authorities

- The local City and/or District Council needs to be involved as landowners and because they would have specific legal duties at any site designated as a bathing water: providing public information signs about water quality and potential pollution sources at the site, and taking management measures during pollution incidents (Regulations, 9.1 and 12).
- The proposal should go before the Cam Conservators Regulatory Committee. Without the Conservators being confident that swimmers and boaters can mix safely, it may be a non-starter and could potentially cause unnecessary anger in the wider community towards the Conservancy.
- John Daniels is the Area bathing water lead for the Environment Agency.

7.3 The role of DEFRA

- DEFRA offer advice on possible applications - bathingwater@defra.gov.uk. They aim to determine these in time for the following bathing season but the process can take longer. Essential components include:
 - A survey of usage for bathing during the bathing season: the numbers of adults swimming, and children swimming and paddling, because children are likely to ingest water while paddling so are counted as bathers.
 - Information on the facilities provided to support bathing.
 - Evidence of local consultation.
 - Details of who is responsible for managing the site, whether it's the local council or a private operator.
 - The summary of responses to the Defra consultation on the designation of part of the River Wharfe in Ilkley, illustrates the issues that people were concerned about.

7.4 Useful information sources

- The practicalities of gaining designation: www.outdoorswimmingsociety.com/should-swimmers-seek-bathing-water-designation-for-local-swim-spots/
- Ilkley River campaign seminar: <https://sites.google.com/view/cleanwharfeilkley/the-campaign-news>
- Summary of points from the Ilkley seminar: www.imogensriverswims.co.uk/blog/issues/key-questions-for-seeking-bathing-water-designation/
- Guide for landowners and others on establishing inland bathing areas: www.outdoorswimmingsociety.com/access-all-areas/
- Advice on shared use of waterways: www.britishcanoeing.org.uk/go-canoeing/access-and-environment/access-to-water
- Outdoor Swimmers Code: www.outdoorswimmingsociety.com/outdoor-swimmers-code/
- Wild swimming in Cambridge: www.cam.ac.uk/research/news/going-with-the-slow-flow
- News item: www.businessgreen.com/news/4026942/defra-unveils-gbp10m-fund-drive-private-investment-nature-projects
- News item: [Push for bathing water quality hailed as 'game changer' for UK rivers](#)
- News item: [Ilkley pushes for bathing area status to protect river 'used as open sewer'](#)
- News item: [Ilkley river group accuse environment ministers of blocking bathing application](#)
- News item: [Sewage will flow into Ilkley river until at least 2030, says government](#)
- News item: [Ilkley river clean-up: Bathing water status plan opposed](#)
- News item: [Yorkshire swimming spot to get bathing water status in UK first](#)
- News item: [Ilkley River Wharfe is first in England to become bathing site](#)
- News item: [One man's fight to get bathing water status for a stretch of river near Bath](#)
- News item: www.cambridge-fpas.co.uk/3884/anglian-water-loses-appeal-judges-decision-award-compensation-river-cam-anglers/
- News item: www.endsreport.com/article/1707884/environment-agency-drops-pollution-incident-reporting
- News item: www.fecra.org.uk/docs/Cambridge_Cows_on_the_Commons.pdf
- News item: www.nytimes.com/2018/07/15/world/europe/cambridge-england-cows.html
