Current condition and challenges for the future: Scotland river basin district



Summary of responses

Introduction

This digest summarises responses to the consultation on the challenges for the second river basin management plan for the Scotland river basin district[1].

The aim of the consultation was to seek feedback on potential options required to make a step change to address challenges identified for the district to meet the Water Framework Directive targets for 2021 and beyond[2].

The challenges are:

- rural diffuse pollution;
- impacts on the physical condition of the water environment;
- toxic substances and urban diffuse pollution;
- water pollution caused by land contamination.

Summary of responses

Thirty eight responses were received to the consultation, from a variety of stakeholders, including many with a key role in delivering improvements for the water environment. A full list of respondents is available in Appendix 1.

Overall, responses were strongly supportive of the proposals required to tackle the significant challenges outlined in the consultation. Respondents were also clear that we will need to build on existing partnerships to meet the step change needed to achieve our objectives.

Views received on how to tackle rural diffuse pollution

There was widespread backing for the suggested proposals and support for the work being undertaken to address rural diffuse pollution[3]. Some respondents were keen to influence the selection of new priority catchments. The importance of partnership working for delivery was a common theme and suggestions about how this could be enhanced included:

- holding open community meetings and farm visits with SEPA, stakeholders, land owners and land managers;
- developing publications highlighting the economic benefits of adopting good environmental practices;
- focusing resources on promoting behaviour change through peer group training and education For example, local 'champions' could help disseminate information in the community;
- working with Scotland's Rural College[4] farm business consultants to raise awareness of environmental regulations with their clients via government funded knowledge transfer and advisory activities;
- involving partners and stakeholders in encouraging land managers into appropriate

[1] http://www.sepa.org.uk/water/river_basin_planning/significant_issues.aspx
[2] A parallel consultation was held for the Solway Tweed river basin district, jointly with the Environment Agency. Both consultations ran between 19 December 2013 and 22 June 2014.
[3] http://www.sepa.org.uk/water/river_basin_planning/diffuse_pollution_mag/priority_catchments.aspx
[4] http://www.sruc.ac.uk/

Scotland Rural Development Programme[5] schemes to implement improvements.

Respondents who commented on proposals for re-prioritisation of funding for diffuse pollution measures supported an emphasis on achieving multiple benefits. There were also suggestions to ask large organisations to contribute to community education funds, and to prioritise funding towards actions with a greater public to private benefit ratio. Several respondents made proposals for ways of capitalising on the opportunities offered by Common Agricultural Policy reform[6], for example, in using greening payments for land managers to carry out nutrient budgeting, and in linking farm payments to compliance with best practice. There was also a suggestion to integrate diffuse pollution project aims into further education courses in the form of practical examples and pilot projects.

Phosphorus reduction was raised as an area of interest and the proposal to reduce additives in animal feed received a mixed response. Other suggestions for phosphorus reduction included focussing effort on precision farming, removal of phosphorus from detergents and improving discharges from private drainage systems.

Views received on restoring the physical condition of the water environment

The proposal to develop an effective delivery framework building on the restoration plan[7] was widely supported.

Among the responses were comments about:

- how objectives in relation to fish barriers are set with regard to historical and cultural interests;
- the need to involve local communities in decision making;
- the delicate balance to be struck between conflicting interests when undertaking restoration work.

Payment for ecosystem goods and services was suggested as a potentially useful approach to incentivising and facilitating land manager support for restoration. Several respondents wished to see an increase in funding available for restoration projects but not at the expense of other environmental work areas perceived as being at least as important.

Views received on tackling toxic substances and urban diffuse pollution

There was broad support for the use of sustainable urban drainage systems (SUDs) but the cost of retrofitting such systems was a concern for some respondents. The control of toxic substances at source was seen as the priority for reducing this pressure. Respondents suggested that measures to address urban diffuse pollution could be tied to the development of green networks and other similar projects to achieve multiple benefits. A suggestion was made that establishing an advisory group for urban diffuse pollution, much like the Diffuse Pollution Management Advisory Group[8] for rural diffuse pollution, could be a useful first step to prioritise pressures and solutions.

[5] http://www.scotland.gov.uk/Topics/farmingrural/SRDP
[6] http://www.scotland.gov.uk/Topics/farmingrural/Agriculture/CAP
[7] http://www.sepa.org.uk/water/river_basin_planning/implementing_rbmp.aspx
[8] http://www.sepa.org.uk/water/river_basin_planning/diffuse_pollution_mag.aspx

Views received about tackling water pollution caused by land contamination

Respondents encouraged increased partnership working between SEPA, local authorities and stakeholders to ensure that action to address contaminated land is carried out effectively while also helping to achieve multiple benefits from remediation actions. It was suggested that there is a need for greater legal clarity over the lines of accountability and responsibility for sites. It was also suggested that further information and environmental monitoring may be required to understand fully the scale and impact of land contamination on the water environment.

Views received on other topics

Measures to improve surface waters are always aimed at benefiting ecological quality and only implemented if they are expected to do this. Some responses suggested that not all stakeholders are aware that this is the case.

Several respondents raised concerns about the potential risks posed by invasive non-native species (INNS). There was call for clarity in funding streams to tackle this issue and it was suggested that funding should target and enable catchment scale projects. Respondents highlighted the need for a robust approach to surveillance, monitoring and early detection of invasive non-native species combined with rigorous biosecurity measures to protect against the multiple pathways for invasion.

Views were also expressed on the potential impacts of climate change, for example, by exacerbating existing pressures.

Respondents emphasised that ensuring actions are developed to tackle the full range of pressures, rather than single pressures, is most cost-effective. It was suggested that we should explore whether funding could be re-prioritised in ways that encourage multiple benefits and cross-pressure delivery. Examples could include funding to address urban diffuse pollution and flooding challenges, and impacts on physical condition with flood risk reduction actions.

Requests for, and offers to share, environmental data were also received.

Next steps

Given the high level of support received, the proposals outlined in *Current condition and challenges for the future: Scotland river basin district* are now being taken forward to develop the second river basin plan.

Ongoing engagement[9] and formal consultation on the second plan development will provide further opportunities to influence what can be achieved for the water environment over the next twelve years. The consultation will be published in November 2014.

To support the second plans in Scotland, the Scottish Government will also consult on proposals for delivery mechanisms to tackle morphological pressures in November 2014.

SEPA plans to work with SNH, the Scottish Government and the other members of the Statutory Group on Non-Native Species[10] to progress the actions identified in the supplementary plan for INNS. Some of these actions overlap and align with those being taken forward by the Non-Native Species Action Group under the Scottish Biodiversity Strategy 2020. Other actions may require additional partnership working to prevent deterioration from INNS.

[9] Details of the engagement can be found at http://www.sepa.org.uk/water/river_basin_planning/how_we_work_with_others.aspx

[10] Details of the group are outlined in the INNS supplementary plan; http://www.sepa.org.uk/science_and_research/what_we_do/biodiversity/invasive_non-native_species.aspx

Annex 1. Respondents to the CCCF Scotland consultation

Aberdeen City Council	North Ayrshire Council
Andrew Jamieson	Orkney Islands Council
Association of Salmon Fishery Boards and Rivers and Fisheries Trusts of Scotland (RAFTS)	Outer Hebrides Fisheries Trust
Association of Scottish Shellfish Growers	Planning Service, South Ayrshire Council
Catherine Morgan	Renfrewshire Council
City of Edinburgh Council Transport and Environment Committee	River Forth Fisheries Trust
Convention of Scottish Local Authorities, COSLA	RSPB Scotland
Cromarty Firth Fishery Board / Trust	Scottish and Southern (SSE)
David Cranstoun	Scottish Land and Estates
East Ayrshire Council	Scottish Natural Heritage
EDF Energy	Scottish Water
Energy UK	Scottish Woodlands Ltd
Environmental Protection Scotland	South Lanarkshire
Gordon Ingram	Spey Fishery Board & Spey Foundation
Loch Lomond & the Trossachs National Park Authority	Stirling Council
Mid Clyde Angling Association	Tay District Salmon Fisheries Board
Midlothian Council	The Coal Authority
Migdale Smolt Ltd	The Deveron, Bogie and Isla Rivers Charitable Trust
National Farmers Union of Scotland (NFUS)	The Metropolitan Glasgow Strategic Drainage Partnership