



# River basin planning in Scotland

## Significant Water Management Issues in Scotland and the Solway Tweed

### Summary of responses to the consultations

October 2020

Every day SEPA works to protect and enhance Scotland's environment, helping communities and businesses thrive within the resources of our planet.



We call this **One Planet Prosperity**

For information on accessing this document in an alternative format or language please contact SEPA by email at [equalities@sepa.org.uk](mailto:equalities@sepa.org.uk)

If you are a user of British Sign Language (BSL) the Contact Scotland BSL service gives you access to an online interpreter enabling you to communicate with us using sign language.

<http://contactscotland-bsl.org/>

[www.sepa.org.uk](http://www.sepa.org.uk)

Strathallan House, Castle Business Park, Stirling, FK9 4TZ

## Introduction

The Significant Water Management Issues report was published on 19 December 2019 and is an important part of the river basin planning process. It set out our assessment of the biggest challenges for the future of Scotland's water environment ahead of the third river basin plans that run from 2021 to 2027. It included a consultation, which was open from 19 December 2019 to 19 June 2020, in which we asked whether or not you agreed with our assessment and prioritisation of these issues. The consultation is part of a wider, ongoing engagement with stakeholders.

A consultation also ran for the Solway Tweed basin. This highlighted the issues that were impacting on the water environment that is close to or crosses the border between Scotland and England. Responses relating to that consultation are included in this summary.

We would like to thank everyone who took the time to respond to the consultation.

The significant water management issues that we proposed were:

- Water scarcity
- Waste water discharges
- Rural land use
- Restoring resilience in physically modified rivers
- Manmade barriers to fish migration
- Hydropower
- Fish farming and wild fish interactions
- Invasive non-native species

## Summary of responses

We received 62 responses to the consultation; 17 for the Solway Tweed river basin district and 45 for the Scotland river basin district. They came from a range of stakeholders and responsible authorities, representing statutory agencies, wildlife and conservation, fisheries and fishing, farming and land management as well as submissions from individuals.

Respondents addressed each of the Significant Water Management Issues with a variety of comments, concerns and suggestions. This digest summarises responses relating to the issues and our overall approach. The more specific comments concerning individual sites or water courses have been passed to the case officers where appropriate.

There was widespread agreement that the issues identified should be seen as priorities and there was support for the work that has been carried out in these areas so far. Some respondents suggested that the scope of the issues should be broader and a further set of responses described issues that we have not prioritised and put forward arguments as to why they should be included.

The responses can be summarised under the following themes:

### **1. Approach**

There were many responses that called for stronger integration and alignment of river basin management plans (RBMP) with other plans and policies to deliver multiple benefits. Examples of these are flood risk management plans and the Scottish biodiversity strategy to support climate change and biodiversity actions. Linked to this is the call for a more holistic approach to RBMP, working at a catchment scale and considering cumulative effects of pressures. Partnership working is seen to be crucial to this and some responses thought that SEPA should be more proactive in facilitation of partnerships.

The presence of plastic in the water environment was raised as a concern and one that also required better integration of policies and approaches. We were also reminded of the importance of groundwater.

### **2. Scope and ambition**

Some people were concerned that the proposals were lacking in ambition; particularly voicing disappointment at the lack of actions relating to invasive non-native species, septic tanks and combined sewer overflows. The limited number of river restoration specialists available to undertake projects was a concern. There was also a suggestion that the Water Environment Fund (WEF) should be broadened to include rural and small projects.

## **Comments on the issues put forward in the consultation**

- **Water scarcity**

Respondents agreed that this was a significant issue, with concerns over fish survival, water temperature and climate change in their comments. Suggestions of ways of addressing water scarcity included adopting a catchment scale approach and employing better riparian

management. There were concerns that water supplies on islands and the impact of water scarcity on groundwater were absent from the discussion of this issue.

- **Water discharges**

Individual septic tanks and private treatment packages were identified as a potential source of pollution that needed additional action to ensure compliance. Some respondents suggested that increased development in rural areas could lead to further risk of pollution of watercourses from septic tanks.

- **Rural land use**

Respondents agreed that this was a significant issue. In addition to farming pressures mentioned in the consultation, a number of other potential sources were often cited such as septic tanks; private treatment packages; other rural industries, such as forestry (acidification was highlighted); and golf courses. Partnership working with land managers and owners was considered to be an important part of successful delivery of actions, while other respondents raised compliance and regulation.

- **Restoring resilience in physically modified rivers.**

The level of ambition, especially for rural water bodies was noted. Restoration was cited as a potential catalyst for urban regeneration. Low intervention solutions and extending the scope of restoration to include riparian habitats were considered omissions from this description of this issue. The scope of WEF funding was mentioned.

Restoration and management of rivers in the rural environment was considered to be an important part of increasing resilience to flooding and biodiversity. However, it was also highlighted as a risk to agricultural productivity and changes in management could have a negative impact by increasing the risk of flooding.

- **Man-made barriers to fish migration**

Comments about this topic included the scarcity of people with the skills to undertake some of this work and the need for better partnership working, in particular with the Fisheries Trusts and Boards. Respondents also commented on the level of ambition and whether it would be possible to achieve the delivery targets. There were general remarks about the scope of the

WEF funding programme. Eels and lamprey were identified as migratory species which should also be considered when scoping whether a barrier is passable.

- **Hydropower**

Submissions mostly focused on the need to balance Scotland's energy security and commitment to renewables against the impact on biodiversity, recreation and migratory fish.

- **Fish farming and wild fish interaction**

Respondents agreed that this was a significant issue and that the main factors, such as interaction with wild fish, were identified.

- **Invasive non-native species**

Respondents agreed that this was a significant issue. There were a lot of comments regarding invasive species, both freshwater and marine. Funding, partnership working, maintaining the eradication and successes already achieved and level of ambition were common themes.

Solway Tweed responses also raised the importance of coordinated action between agencies in Scotland and England to ensure that, for example, farms on or crossing to the country boundary had a consistent approach and common standard of water management. The Border Esk was identified as a river that would benefit from a holistic catchment management approach for the whole river system.

## Next Steps

The proposals outlined in [\*River Basin Management Planning in Scotland – Significant Water Management Issues for Scotland\*](#) and [\*The challenges facing our water environment in the Solway Tweed\*](#) will now be taken forward to develop the third river basin plan. The responses to these consultations will help inform that process.

Ongoing engagement and formal consultation on the development of the third plans will provide further opportunities to influence what can be achieved for the water environment over the next six years. The consultations will be published by the 22 December 2020.

