



**Current condition and challenges for the future:
Solway Tweed river basin district
Response from Environmental Protection Scotland
June 2014**

Environmental Protection Scotland brings together individuals and organisation across the public, private and voluntary sectors to discuss and promote ideas, knowledge and solutions to achieve our aims of a cleaner, quieter, healthier, sustainable Scotland. We are a registered charity that informs debate, provides impartial advice and policy updates based on sound science and research in the fields of air quality, land quality and noise.

Governed by a Board of Trustees and supported by Expert Advisory Groups (EAGs) our structure enables us to take a progressive and pragmatic approach to the issues which concern us and, on behalf of our wide and extensive cross-sector membership, to promote integrated and effective policy-making which supports sensible and workable solutions to pressing environmental challenges. Our EAGs represent a wide spectrum of our members and are chaired by experts in their field and seek to build stronger alliances and support better collaboration between government, practitioners, legal experts and researchers.

Our land quality work aims to encourage the sustainable management of land and resources that is protective of human health, the water environment, ecology, heritage and property. By providing continuity, our Land Quality EAG promotes a better understanding of land quality and policy to the public and regulators.

Comments

1A	<p>It is encouraging that SEPA and the Environment Agency recognise the difficulties in determining the sources of diffuse pollution and we acknowledge the scale of work ahead of both agencies in working towards targets for 2015. Although a number of challenges have been highlighted in the consultation document it is likely that other challenges will become apparent through continued farm visits and ongoing discussion with land managers.</p> <p>Environmental Protection Scotland (EPS) supports continued cross-partnership working and educational training for land managers with the view that prevention is better, and no doubt cheaper, than cure.</p> <p>We agree that funding priorities should include the development of woodland / wetland buffers upstream to intercept pollutants. EPS expect any re-prioritisation of funding to be done with full public consultation to ensure transparency with the prioritisation</p>
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	matrix.
1B	No.
2A	<p>The suggested options appear to be correct and sufficient with the following caveats:</p> <p>We agree that working with construction companies would help to embed improvements in the water environment however we would also include local authority planners as well to ensure that environmental protection is developed and ingrained at all levels.</p> <p>EPS is concerned that increasing the support and funding would see cash being diverted from elsewhere to the detriment of other projects. Both agencies should be clear as to where an increase in funding would come from.</p>
2B	No.
3A – F	<p>EPS do not have specific comments for each chemical rather we provide general comments.</p> <p>We believe it will be difficult for SEPA and the Environment Agency to tackle this alone and that they will have to work in partnership with other Scottish and UK Government departments to push for restrictions to use, manufacturing and import at an EU level.</p> <p>The use of SUDS is an appropriate tool to reduce contaminants reaching the water environment and we would encourage both SEPA and the Environment Agency to work closely with developers ensuring that SUDS is incorporated for all new road, housing and commercial properties as well as land managers to try mitigate diffuse pollution in agricultural areas.</p> <p>SUDS will be advantageous for combating increased run-off from rural and urban locations due to increasing rainfall caused by climate change.</p> <p>Retrospective fitting of SUDS will be expensive in this time of economic uncertainty and reduced public sector funding.</p> <p>A lot of the problems associated with these chemicals are their ubiquitousness in everyday materials and lower environmental concentrations will only be achieved by manufacturers changing their production materials. However that therefore means that other chemicals will be used and the cycle continues.</p>
4	As Question 3.
5	<p>Yes.</p> <p>The consultation document clearly shows that diffuse pollution is a greater concern to the improvement of water bodies than point sources e.g. contaminated land sites. Giving greater weight to land potentially affected by contamination may then take the</p>

	<p>focus away from identifying diffuse pollution sources and tackling those problems.</p> <p>As ‘contaminated land’ has a legal definition under Part IIA of the Environmental Protection Act 1990 there are requirements already in place to deal with determined contaminated land sites. There is however no ring-fenced money available to local authorities to remediate contaminated land who often rely on the planning system to deal with land that is potentially contaminated.</p> <p>It is Environmental Protection Scotland’s opinion that SEPA and the Environment Agency should work closely with local authorities, who are the lead regulators for Part IIA (non-special) sites, and with planning authorities to ensure that the continued hard work to improve the quality of Scotland’s land expands to improve water quality.</p>
6	Yes.
7	No.

Respondent's details

1. Please provide your contact details.

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2. Please provide your email address.

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3. Would you like your response to be considered confidential?

No

4. Are you responding on behalf of an organisation?

Yes

If yes, which organisation are you representing?

Environmental Protection Scotland

5. Have you responded to RBMP consultations before?

No

If yes, which consultations did you respond to?

N/A