



**Inform the development of the second river basin management plan for the  
Scotland river basin district  
Response from Environmental Protection Scotland  
April 2015**

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 areas 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.

We welcome the opportunity to comment on the development of the second river basin management plan.

**Comments**

<b>1</b>	<p>Environmental Protection Scotland does not feel that maintaining the status quo, i.e. the ‘baseline’ scenario is an option. Too many waterbodies would remain at worse than good status for too long to the detriment of the wider environment.</p> <p>It is evident from the consultation and last year’s “Current condition and challenges for the future” consultation that SEPA have done a lot of work identifying what and where the main areas of concern are but that work still has to be done. It is also apparent that progress is made other problems will appear that will have to be addressed throughout this RBMP cycle.</p> <p>Diffuse rural pollution will be difficult for SEPA to tackle on its own therefore we would expect SEPA to work with landowners, farmers etc. to minimise pollutant inputs at source</p>
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	<p>rather than through remedial actions. In our response to last year's CCCF consultation we agreed that the installation of SuDS will minimise inputs to waterbodies.</p> <p>EPS are not commenting on all aspects of this consultation as these are outwith our areas of expertise but if all proposed actions follow the 'Step 2' scenario and additional £31m funding will have to be committed, with 'Step 1' an additional £13.5m will be required. Given the tightening of public finances in this economic climate we therefore accept that 'Step 1' is probably the most acceptable scenario.</p> <p>With regards to funding we would not expect cash being diverted from elsewhere to the detriment of other projects; SEPA should be clear as to where the funding for RBMP purposes would come from.</p>
<b>2</b>	<p>Environmental Protection Scotland is pleased that land contamination has been identified and addressed within this cycle of RBMP. We are also encouraged that SEPA will be working with other UK and European agencies to work on legislative controls on, amongst others, the priority hazardous substances.</p> <p>We note that unlike the other aspects of the RBMP consultation that no specific funding has been set aside (i.e. the other aspects have a 'Step 1' and 'Step 2' scenario funding) and we question where the funding to identify key sources and the risk posed is to come from.</p> <p>Environmental Protection Scotland hope that SEPA will work closely with local authority officers to quickly identify potential sites / areas of concern. We would expect that once sites have been identified that through partnership working SEPA, local authorities and developers will address land contamination through development management (as well as ensuring that developers do not cause new pollutant inputs).</p>
<b>3</b>	No response
<b>4</b>	No response
<b>5</b>	Environmental Protection Scotland agree that SEPA should be targeting the older hydroelectricity schemes to give the greatest environmental benefit. We are concerned that 50 waterbodies have deteriorated to worse than good and would expect SEPA to be addressing these areas as a priority.
<b>6</b>	No response
<b>7</b>	No response
<b>8</b>	No response

**Respondent's details**

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**Responding on behalf of:**

Environmental Protection Scotland