

The draft river basin management plan for Scotland 2021 - 2027

<i>General Comments</i>
<p>Over the next 25 years, Scottish Water plans to transform how our services are delivered as we look to replace our ageing assets, to play our full part in reducing emissions to beyond net zero and to ensure our assets are resilient to the effects of climate change.</p> <p>To continue to deliver great value, we must maximise the benefit that our investment delivers. We are therefore enhancing our approach to investment planning and prioritisation, moving from a fixed regulatory contract covering the River Basin Management Planning (RBMP) 3 period to a dynamic and more flexible process.</p> <p>This new approach will allow us to continually incorporate the latest evidence, collaborating with stakeholders and communities to ensure the costs and benefits of competing investment priorities are balanced appropriately.</p>

<p><i>Section</i> 3.1. Q4</p>	<p>Section 3.1 Action to create healthier and more resilient communities.</p> <p>Do you agree with the approach outlined? Yes/Not sure/No Share your thoughts with us in the space below</p>
<p>Yes, Scottish Water agrees with the approach outlined. We particularly welcome the approach to restore the water environment, benefit deprived communities, support economic regeneration and support adaption of communities to build resilience to the climate emergency. We agree that improving the management of surface water is key and recognise the need for close working between Scottish Water, SEPA and Local Authorities in linking RBMP, flood risk management and land use planning.</p>	
<p><i>Section</i> 3.1. Q5</p>	<p>What issues do you see with us adopting this approach? Share your thoughts with us in the space below</p>
<p>Scottish Water believes that the preferred approach will require strong collaborative partnerships to be established between public bodies, stakeholders, businesses and communities, with targets and responsibilities clearly identified. This may require raising awareness of RBMP within communities to ensure the benefits for the water environment can be fully realised.</p> <p>We consider that whilst working together is vital to deliver further benefits, new ways of working are required to deliver multi-stakeholder solutions and that innovative</p>	

blue-green infrastructure solutions may take longer to implement and to deliver benefit.

<i>Section</i> 3.1. Q6	Can you suggest any changes to the approach that will help us reach our goals? Share your thoughts with us in the space below
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We believe that a strong collaborative partnership approach is required to deliver potential new river restoration projects in Scotland's towns and cities and a real focus on engagement with stakeholders and effective communication is required.

It will be important to promote and support the use of sustainable construction techniques, creating an environment which enables the development and adoption of emerging and innovative techniques and technologies

<i>Section</i> 3.2. Q7	Section 3.2 Water Supply & Wastewater. Do you agree with the approach outlined? Yes/Not sure/No Share your thoughts with us in the space below
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Yes, we broadly agree with the approach outlined and we welcome the focus on the use of more 'natural' methods of rainfall attenuation (blue-green solutions), increasing sustainable land management to protect raw water quality, improved water efficiency, reducing inputs of harmful substances, supporting opportunities for heat recovery from sewers and exploring opportunities for maximising wider value recovery.

Recent weather patterns have resulted in increased pressure on drinking water supplies in some regions of Scotland. Inspiring our customers to use water wisely is one of the ways in which we will ensure that there is sufficient availability of source water that can be treated and supplied to our customers both now and in the future, even during more extreme droughts. Reducing the demand for water is also part of Scottish Water's road map to going beyond net zero by 2040.

Due to the recent cyber-attack on SEPA systems, it has not been possible to complete reviews of Scottish Water Study outputs which inform the need for improvements to be carried out. We would wish to highlight that the specific numbers set out for WwTW and Unsatisfactory Intermittent Discharges (UID) in the draft RBMP3 plans are indicative of the progress Scottish Water has made to deliver improvements and that further work will be required with SEPA to help refine these, so that the RBMP3 can be refreshed.

<i>Section</i> 3.2. Q8	What issues do you see with us adopting this approach? Share your thoughts with us in the space below
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In its previous investment plans, Scottish Water has agreed individual projects within a regulatory contract broadly aligned with RBMP cycles. Scottish Water is committed to delivering improvements set out within the 2015-21 regulatory period to help support the outcomes set out in RBMP2.

Whilst Scottish Water has been given ministerial direction to support the objectives of

RBMP3, we have also been given direction to develop our approach to consistent prioritisation of all investment need, carefully considering the costs and benefits and the timings of any investment. We no longer have a fixed regulatory contract identifying project outputs that can be aligned with RBMP3 measures and delivered over the next 6 years. Through detailed appraisal of our investment needs, Scottish Water’s plans could be misaligned with RBMP3 aspirations and that this will need to be carefully managed.

We consider that this approach will need to develop and adopt sustainable regulation principles which includes carbon in the assessment of whole life costs and consistent consideration of environmental risk and impacts. This should facilitate alternative approaches to end of pipe treatment, for example product substitution, alignment of surface water policies and decisions based on environmental capacity instead of standards or limits.

It would be useful if SEPA could confirm the status of public water supply in relation to other stakeholders, industries and interests. Scotland’s National Water Scarcity Plan acknowledges that public water supply is a priority during water shortages, and it would be useful if this information was included in any documents produced following this consultation.

<i>Section 3.2. Q9</i>	Can you suggest any changes to the approach that will help us reach our goals? Share your thoughts with us in the space below
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We have no comments to make in terms of changes to the approach but we would emphasise that more sustainable solutions may take longer to implement and that all of the benefits may not be realised before the end of the RBMP3 cycle.

<i>Section 3.3. Q10</i>	Section 3.3 Sustainable and resilient rural land use and management. Do you agree with the approach outlined? Yes/Not sure/No Share your thoughts with us in the space below
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Yes, we agree with and welcome the approach outlined which recognises the importance of the rural environment and efficient use of land and water resources and we note the proposed use of enforcement action tools to drive compliance mainly in respect of Farm and Land management

Diffuse pollution remains a persistent problem in some river abstraction catchments and forestry activity can put pressure on source water quality, particularly in wet areas of the country or during wet weather events. Opportunities exists to audit and improve both the agricultural and forestry sector to move toward better protection of the water environment, particularly in drinking water catchments.

<i>Section 3.3 Q11</i>	What issues do you see with us adopting this approach? Share your thoughts with us in the space below
<p>A measured and proportionate approach to enforcement and the application of current rules and regulation should build co-operation and success. Scottish Water's approach to Sustainable Land Management is to work with land managers and other regulatory bodies to find common ground and where business as usual for land managers isn't interrupted or profitability impacted. There are many stakeholders active in these areas, therefore coordination and clear messages are important.</p>	
<i>Section 3.3. Q 12</i>	Can you suggest any changes to the approach that will help us reach our goals?
<p>Established industry experts and stakeholders will help guide and deliver the RBMP3 outcomes and may benefit from a review of what went well and what could be better from the previous plans so that areas of focused activities can be identified.</p>	
<i>Section 3.4. Q13</i>	Section 3.4 Removing man-made barriers to fish migration. Do you agree with the approach outlined? Yes/Not sure/No Share your thoughts with us in the space below
<p>Yes, we agree with the principle that removing barriers to open up additional habitat is a sensible approach. 262 barriers are highlighted for removal and the activities needed for those linked to Scottish Water operation will be determined through the processes set out above in our response to Q8.</p>	
<i>Section 3.4 Q14</i>	What issues do you see with us adopting this approach? Share your thoughts with us in the space below
<p>Scottish Water believes that the preferred approach will require strong collaborative partnerships to be established between public bodies, stakeholders, businesses and communities, with targets and responsibilities clearly identified. This may require raising awareness of RBMP within communities to ensure the benefits for the water environment can be fully realised.</p>	
<i>Section 3.4. Q15</i>	Can you suggest any changes to the approach that will help us reach our goals? Share your thoughts with us in the space below
<p>No comment</p>	

<p>Section 3.5 Q16</p>	<p>Section 3.5 Summary of other actions to protect and improve the water environment.</p> <p>Do you agree with the approach outlined? Yes/Not sure/No Share your thoughts with us in the space below</p>
<p>Yes, we broadly agree with the approach outlined.</p>	
<p>Section 3.5 Q17</p>	<p>What issues do you see with us adopting this approach? Share your thoughts with us in the space below</p>
<p>Bathing Waters It is stated that 94% of Bathing Waters are now of ‘sufficient’ or better water quality classification. It is suggested that there should be aims to achieve more ‘good’ and ‘excellent’ classifications and to avoid 5 successive ‘poor’ classifications at any bathing water.</p> <p>We support the aim of avoiding ‘poor’ classifications and that, where measures are proportionate, striving for more ‘good’ and ‘excellent’ classifications is appropriate.</p> <p>However, at many bathing waters, it is very likely that the additional improvements required to enhance our (and others) assets to support these classifications would have significant financial and carbon costs and community impacts and, therefore, would need careful consideration.</p> <p>Shellfish Water Protected Areas (SWPA) One of the stated aims is to target efforts within SWPAs, in consultation with the sector, to focus on prioritised Shellfish Production Areas that require improvements to help secure consistent Food Standard’s Scotland (FSS) ‘A’ class” products.</p> <p>We would be interested in understanding how a recent review of 47 priority SWPAs has informed the content of this consultation.</p>	
<p>Section 3.5 Q18</p>	<p>Can you suggest any changes to the approach that will help us reach our goals? Share your thoughts with us in the space below</p>
<p>During the third cycle of RBMP we suggest that the adopted approach includes proportionality and cost/benefit considerations when considering further ‘good’ or ‘excellent’ classifications at bathing waters.</p>	
<p>Section 4 Q19</p>	<p>Section 4. Summary of our objectives for Scotland.</p> <p>Do you agree with the approach outlined? Yes/Not sure/No</p>

Share your thoughts with us in the space below	
<p>Yes, we broadly support the aims as set out. However, the scope and scale of investment required is not yet understood and may not represent the most appropriate priorities for Scottish Water. Whilst Scottish Water can commit to developing the preferred options to meet agreed needs, we cannot commit to delivering the improvements to meet the specific aims set out within the RBMP3 cycle.</p>	
20	<p>The consultation Spotfire tool is a draft update of the Water Environment Hub. It will contain the data on RBMP pressures, actions and objectives for the third cycle (2021 to 2027). Please provide any feedback you have on the tool below.</p> <p>Share your thoughts with us in the space below</p>
<p>No comment</p>	



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