

**River Basin Management Plans 3rd cycle
Significant Water Management Issues for Scotland and
The challenges facing our water environment in the Solway Tweed**

Overview

General Comments

Scottish Water welcomes the opportunity to respond to the “Significant Water Management Issues (SWMI)” for Scotland and “The challenges facing our water environment in the Solway Tweed River” consultations.

We understand that SWMI is one component of a tranche of consultations in preparation for the third cycle of River Basin Management Plans (RBMPs), covering the period between 2021 and 2027. We also understand that draft RBMPs are due for publication at the end of 2021 and that consultation on these will run thereafter.

For the period of the third RBMP cycle, we agree that the most significant issues for water management have been identified within the consultations and we do not consider that any additional issues need to be added.

We would encourage SEPA to ensure that Water Framework Directive (WFD) / RBMP actions are aligned with Flood Risk Management actions, Sector Plans and that these consider the link to achieving Scotland’s net zero emissions commitments. For example, when developing draft third cycle plans to appraise the overall challenge of delivering the actions required for Scotland, from both an emissions and a financial perspective

The consultation recognises that the “predicted rate of environmental change is unprecedented”. However, it mentions the summer of 2018, providing facts and figures about low water levels and acknowledging uncertainties for the future as only one example. Another feature of environmental change is an increase in frequency and magnitude of variations in weather patterns.

The consultation recognises Scotland needs “effective catchment management of water availability alongside fair and efficient use of water in our homes and businesses to ensure Scotland’s resilience to climate change”. However, the need to stimulate, encourage and support innovation to become more sustainable and resilient is not mentioned.

We have provided some general comments and some specific comments in relation to certain issues affecting the water environment.

Detailed Response

Specific Comments

1a	Do you think we have identified the most important issues that are impacting on our water environment in Scotland?
Yes	
1b	Please give a reason for your response
<p>We agree that priority has been given to the most significant water management issues for the 3rd cycle of RBMP.</p> <p>We have some comments on the Water Scarcity Issue (number 1) as set out under the heading below.</p> <p>Water Scarcity</p> <p>From a water resources perspective, we consider that the most important issues have been included within the consultation.</p> <p>Private supply</p> <p>Whilst not in Scottish Water’s remit, we note that private water supplies are not mentioned in the SWMI document. Private supplies are impacted more quickly than other users when, e.g. in some parts of the country during the summer of 2018, small sources were affected by prolonged dry periods. At that time, Scottish Water was asked by Scottish Government and local authorities to provide support to those on private supplies, and we would welcome a drive to inform and support users to become more water efficient and to waste less water.</p> <p>Public supply</p> <p>Scottish Water supports the proposal for effective catchment management alongside fair and efficient use of water. We strongly believe in the need to have a multi-stakeholder strategy and approach to drive the change in the way in which users value water. We are currently engaged in Water Efficiency projects with various communities and have a role in promoting water efficiency measures with the building industry.</p> <p>Any action taken by SEPA to use legislation to reduce business demand for water from the environment during advanced stages of escalating drought risk should be carefully managed to ensure that this does not directly result in an equal increase in demand on water supplied by Scottish Water.</p> <p>Our investment and drought plan management assumes peak or average demands based on historic demand data together with growth figures. Any unforeseen</p>	

addition to this through changes to legislation would impact drought resilience for public water supplies.

CAR licences

Scottish Water notes the proposal for additional regulatory controls during low flow periods. These controls have already been identified in SEPAs document 'Scotland's National Water Scarcity Plan'. Does the proposal for additional regulatory controls mean that the Water Scarcity Plan and Hierarchy of Action tables are to be revised?

Any change to regulatory controls which impacts our CAR licences or the water availability assumptions of drought plans would have to be introduced in a way which would allow the assessment of impacts and sufficient funding be put in place for mitigation where required.

Scottish Water welcomes discussion with SEPA about measures taken to ensure availability of the public water supply and potential amendments to the CAR process, so that there is sufficient flexibility to deal with unpredictable events.

2a	Do you think we have identified the most important issues that are impacting on our water environment in Border Esk, Tweed & Solway ?
----	--

Yes

2b	<i>Please give a reason for your response</i>
----	---

Priority has been given to the most significant water management issues for the 3rd cycle of RBMP.

- End of Document -