Why we comment on this issue


Planning authorities are legally responsible authorities in securing compliance with the WFD and “in preparing a local development plan, the planning authority is to have regard to any RBMP relating to the local development plan area”. The legislation and guidance is to ensure that planning authorities are responsible in helping to protect, improve and promote the sustainable use of our water environment, which includes wetlands, rivers, lochs, transitional waters (estuaries), coastal waters and groundwater (including groundwater dependant terrestrial ecosystems).

Development plans need to be guided by the catchment approach underpinning the RBMP 2015-2021 by adopting an integrated, holistic and sustainable approach to water issues in terms of finding room for water alongside seeking to protect and improve water quantity and quality.

Complexities of choices across these spatial levels means that networked integrated solutions are a necessity and planning authorities need to work closely with Scottish Water and SEPA to deliver integrated solutions.

SEPA’s objectives for this topic

- Land use planning supports the delivery of river basin management objectives and measures.
- Use a catchment based approach to development to improve Scotland’s water environment whilst delivering other multiple benefits.
- The location, site layout and design of new development protects the water environment and maximises opportunities for its improvement.

How we will address this issue through Strategic Environmental Assessment

- Requiring SEA to consider the effects of policies, proposals and allocations on the water environment
- Recommending that SEA objectives used for assessment include objectives aimed at protection and improvement of the water environment including water quality, pollution reduction, sustainable use of water resources, physical condition, flooding and non-native invasive species

Water environment: requirements and recommendations

The following table outlines our requirements and recommendations for Strategic and Local Development Plans relating to the water environment in more detail. If the following requirements are not met then we are likely to make formal representations to the emerging development plan. Further details on the implementation of the requirements and recommendations and supporting information can be found in the Water Environment Background Paper (LUPS-BP-GU2b). The delivery of objectives within the relevant River Basin Management Plan for the SDP and LDP areas must be supported to address identified pressures.
### Requirements

<table>
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<tr>
<th>SDP or LDP</th>
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| SDP and LDP | 1. **Delivery of river basin planning for protection and improvement.** Policies and allocations protect and enhance the water environment by ensuring:  
  - Support of the delivery of the relevant river basin management plan for the LDP area including the water body specific objectives to address identified pressures; and  
  - New developments protect, and were possible, improve the water environment. |
| LDP | 2. **Construction works and structures in and around the water environment.** The policy framework protects and enhances the water environment by seeking to avoid (or remove) instances of construction works and structures in and around the water environment. |
| LDP | 3. **Wastewater drainage provision.** The policies and allocations should ensure connection to the public sewerage system. |
| LDP | 4. **Provision of SUDS.** Policies and allocations protect and enhance the water environment by ensuring:  
  - support for the delivery of the relevant river basin management plan for the local development plan area including the water body specific objectives to address identified pressures; and  
  - new developments protect, and where possible improve the water environment. |
| LDP | 5. **Buffer strips.** The policy frameworks and development allocations should ensure that appropriately sized buffer strips are provided between a development and each water course. |

### Recommendations

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<th>SDP or LDP</th>
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<tr>
<td>SDP and LDP</td>
<td>1. <strong>Multiple benefits of blue green networks.</strong> Policies and allocations should ensure that multiple benefits are delivered as a result of improvements to the water environment, through the development of green/blue infrastructure and sustainable placemaking.</td>
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<td>LDP</td>
<td>2. <strong>Retrofit SUDS.</strong> The policy framework should ensure that opportunities are taken to retrofit SuDS, wherever possible, for developments that involve a change of use and/or redevelopment.</td>
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