



---

# **A consultation on the draft River basin Management Plan for the Solway tweed River Basin District: 2021 Update Digest of consultation responses**

**September 2021**

For information on accessing this document in an alternative format or language please either contact SEPA by emailing to [equalities@sepa.org.uk](mailto:equalities@sepa.org.uk)

If you are a user of British Sign Language (BSL) the Contact Scotland BSL service gives you access to an online interpreter enabling you to communicate with us using sign language.

<http://contactscotland-bsl.org/>

[www.sepa.org.uk](http://www.sepa.org.uk)

Strathallan House, The Castle Business Park, Stirling, FK9 4TZ



## Introduction

The Scottish Environment Protection Agency (SEPA) ran a consultation from 21 December 2020 to 22 June 2021 on the draft third river basin management plan (RBMP) for the Solway Tweed river basin district. This digest summarises the responses received.

The consultation was open to the public and provided an opportunity to comment or contribute to the development of the third RBMP. This consultation was supported by engagement with stakeholders. A consultation for the Scotland river basin ran in conjunction with this consultation. The summary of responses has been published and is available on the SEPA website.

We would like to thank everyone who took the time to respond to the consultation and worked with us to inform the development of the third RBMP.

The consultation set out the main proposals for the third plan:

- re-phasing our objectives for 2021 and 2027 to ensure we prioritise improvements that will bring the greatest benefits;
- ensure SEPA and the Environment Agency coordinate work to support a green economy, wildlife and habitats and the health and well-being of local communities;
- highlight the challenges to the river catchments and estuaries that are in both Scotland and England, and the joint actions needed to resolve them.

## Summary of responses

Twelve responses were received to the consultation from a variety of stakeholders and responsible authorities. A list of respondents can be found in Appendix 1.

Respondents were supportive of the aims set out in the plan and well informed about the RBMP process. Most respondents felt the plan was ambitious, some felt it was aspirational given the rate of progress that has been made to date. A small number felt that the plan was not ambitious enough and lacked detail about how we would deliver on the aims set out.

The strongest theme from the responses was the need for continued and improved partnership working. Robust collaboration will be needed between public bodies, stakeholders, businesses and communities with joint aims and roles and responsibilities clearly identified. Targeting combined resources, focused on delivery, enables complementary solutions and projects to be designed that maximise opportunities to achieve multiple benefits efficiently. Some examples of positive collaborations were cited, including the Cumbria Pioneer Project, with United Utilities to improve water quality and farm infrastructure. Natural England stated a keen interest to continue to work with the Environment Agency to develop shared objectives for the final plan.

Respondents were very positive about the aims for sustainable and resilient land use management. Respondents reiterated the need to work with partner organisations to maximise benefits for climate change and biodiversity crisis. The need for engagement, working with land managers, to seek improvement that mutually benefit their farming practice and the environment was well supported. There were calls for additional funding to be provided to expand this work. Best practice examples were suggested to be an effective

tool. Some respondents expressed concern and frustration that a strong regulatory approach was often inhibitive to progress and damaged relationships.

A small number of respondents raised concern about the impacts of increasingly intensive farming practice in the area. Regulatory breaches in slurry application and the impacts of soil loss and siltation were highlighted. Respondents supported the continuation of SEPAs priority catchment approach in Scotland and the Environmental Land Management Scheme (ELMS) approach in England.

Acidification was raised as a topic of concern for the Galloway area that has not been addressed in the draft plan.

Climate change factored significantly in responses about the sustainable use of water. There were concerns that the low flow conditions will not go far enough to mitigate the risks of drought and sustained high temperatures. A small number of responses called for tightened regulatory framework to improve efficiency, reduce abstractions and reduce waste-water discharges. One respondent felt that existing licenses may need to be changed to reflect the changing pressures of extreme weathers on the water environment and associated ecology.

The need to better educate and inform water users and the general public about water efficiency and discharges was well received. It was highlighted that this will need to be coordinated across a number of organisations to be effectively delivered. More information about how this could be delivered was sought.

Investment in water resilience measures on farms was raised as an issue. Respondents agreed there is a balance sought between the need to sustain a healthy water environment and the demand for businesses to abstract water to produce food and maintain production of sustainable energy through hydropower.

The impacts of abstractions and diversions of surface waters for hydroelectricity generation on river systems and catchments were flagged. Respondents were divided with calls to re-water depleted waterbodies and develop ecosystem resilience to climate change. Industry representatives highlighted the need for essential zero carbon flexible electricity production with additional benefits of local employment, flood mitigation, and helping meet environmental goals such as the control of invasive non-native species (INNS).

The responses were mixed for the proposals for modification to the physical condition of water bodies, including fish barriers. Some respondents felt that the proposals to work in more urban areas came at the cost of carrying out work in the rural environment, particularly in headwaters, where there could be greater benefits to ecology and climate resilience. There was a call for prioritising the restoration of functioning ecosystems to take precedence over the social and economic benefits. The responses from the farmers unions both stressed the implications of restoration of rivers on agricultural land had to be carefully considered. They supported the suggestion for restoration in a more urban setting to deliver multiple benefits for communities.

Respondents requested more information about the approach to deliver improvements for INNS. The impact of INNS on biodiversity, and increased threat from climate change were highlighted as serious concerns for respondents. The fisheries respondents requested a coordinated approach is taken to work at a catchment scale with partner organisations to provide support and investment to facilitate the use of species control agreements and orders.

Respondents suggested that the plan should contain more detail to help them understand how the aims would be delivered. They were supportive of partnership working, not only being used to deliver projects, but also to help develop objectives to align work. Increased

integration and coordination of the RBMP process with other strategic plans and policies to align work and secure commitment to delivering projects was highlighted as important. For example, align RBMP with the Marine Plan to expand on the topic of marine plastics and litter, and the Solway Firth Partnership also suggested integrating their INNS plan with the objectives in the RBMP.

### **Next steps**

We will consider the comments and suggestions in the development of the third plans. The plans will be presented to DEFRA and Scottish ministers later in 2021 and the final plans, if approved, published in December 2021. In the interim we continue to work with partners to deliver the objectives.

## **Appendix 1 – List of Respondents**

Solway Firth Partnership

Marine Management Organisation

Scottish Water

Natural England

Northumbria Water Ltd

Fisheries Management Scotland

Galloway Fishery Trust

National Farmers Union Scotland

National Farmers Union

Drax



