



Scottish Campaign for National Parks

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Cath Preston
River Basin Planning Officer
SEPA
Erskine Court
Castle Business Park
Stirling FK9 4TR

21 June 2009

Dear Ms Preston,

Consultation on the Draft River Basin Management Plan for Scotland

The Scottish Campaign for National Parks' primary aim is to promote the protection, enhancement and enjoyment of nationally outstanding areas that are national parks, or are appropriate to be designated as such or are of sufficient merit to warrant special protection. This is manifest in our support for good stewardship of the country's best environmental assets and encouragement of environmentally sustainable methods of development, particularly within areas of national parks potential. SCNP is a recognized Scottish Charity.

SCNP welcomes the opportunity to comment on the Draft River Basin Management Plan drawn up by SEPA. We find the document a well presented and detailed assessment of the condition of Scotland's water environment.

We are supportive of the emphasis placed on environmental stewardship and of the vision for 2027.

Whilst we recognize the value of setting realistic targets and we also recognize the long time scales involved in improving the environmental status of lochs and rivers, we are disappointed that to the end of the first planning cycle in 2015, this only results in a 7% improvement in status. This begs the question about the need for a step change in funding for the whole WFD programme.

As a campaigning organization for national parks we are particularly concerned about progress towards water environment improvement in protected areas. We would remind you that national parks are a statutory designation and are considered as 'protected areas' within the terms of reference of the World Conservation Union. In that regard we regret the lack of any reference to national parks within the section on protected areas. We would further emphasize the importance of giving high priority to the status of the water environment within national parks and areas which merit national park status (usually drawn from the list of National Scenic Areas). This is important since national parks represent a shop window on the nation's stewardship of its best natural and cultural heritage.

We are also pleased to see the concerns you have for eutrophication and abstraction from rivers even beyond 2027. Within the Cairngorms National Park, for instance, we are of the opinion that housing allocations within the Deposit Local Plan are far too generous and in specific cases will have a deleterious effect on the River Spey which is a Special Area of Conservation. If the precautionary principle is overlooked in regard to housing permissions, we would expect to see SEPA stipulating nutrient stripping within any SUDS proposals.



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In general, we are greatly concerned about the total resources available to SEPA to implement this Plan. Already strains are showing in dealing with the new CAR provisions, which can only mean that if more resources are not forthcoming then frustration will abound and the whole edifice will tumble. That would be a major setback, detrimental to the progress of the River Basin Management Plan.

Yours etc