

Citizens Advice Scotland

Scottish Association of Citizens Advice Bureaux
www.cas.org.uk



Delivering Scotland's River Basin Management Plans: Improving the physical condition of Scotland's water environment

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Introduction

Citizens Advice Scotland, its 61 member bureaux, consumer helpline and Extra Help Unit form Scotland's largest independent advice network. Citizens Advice Bureaux ("CAB") advice services are delivered using over 250 service points throughout Scotland, from the islands to city centres, and through our helplines. Together, the Citizens Advice Service in Scotland helped 300,000 people with nearly 1 million issues in 2013/14.

On 1 April 2014, the roles and responsibilities of Consumer Futures were transferred by the UK Government to the Citizens Advice Service, encompassing Citizens Advice Scotland and our sister organisation Citizens Advice (England and Wales). Citizens Advice Scotland now represents the interests of citizens and consumers in essential regulated markets including energy, post and, in Scotland, water. Our aim within the water industry is to challenge and shape policy to ensure it reflects the needs of consumers. We therefore welcome the opportunity to comment on the Scottish Government's proposals to deliver improvements to the physical condition of Scotland's water environment.

Key Points

Citizens Advice Scotland generally supports the measures set out within the Scottish Government's consultation document which we believe can potentially help strengthen the delivery framework and make an important contribution to ensure the sustainable use of Scotland's water resources. In particular, we welcome measures to carry out restorative work in such a way that it would improve coordination and synergy between the proposals in the consultation document and national policy programmes such as Flood Risk Management Planning in Scotland.

We welcome the approach outlined in the consultation document which identifies the need for systematic partnership working between SEPA, Scottish Water, local authorities and land managers, and other public bodies to determine allocation of responsibility for particular aspects of river restoration thereby improving transparency and accountability for affected communities.

We would encourage, equally, a systematic risk analysis process to be rolled out within joint restoration projects, to balance restoring waterways with ensuring that communities are adequately protected. CAS believes that this is particularly important where culverted waterways are reversed and flood plains restored, to mitigate flooding risks to domestic dwellings and businesses, and also of putting them at risk of higher insurance premiums.

In addition, when issuing a remedial notice, we are of the view that wider communities that may be affected should also be considered, in particular, for communities with a history of flooding, to ensure they are adequately and effectively engaged and consulted. Accessible and clear information must be made available to affected communities on any work being undertaken, and on measures that will protect and / or benefit households and businesses.