

Feedback on River Basin Planning Research

Summary

The paper summarises findings from a questionnaire (response rate 21% across the eleven advisory groups) and field notes from observing meetings between August 2008 and July 2009.

- Respondents are motivated to attend the advisory group meetings because they want to represent their sector and to shape the planning process;
- Respondents are supportive of their coordinators and chairs and provided feedback on how to improve the provision of information;
- Views varied on the level of ambition for the objectives and on satisfaction with the objective setting process;
- The plans' content continues to change and some areas were highlighted as needing more attention;
- The two-way relationship between the NAG and AAGs is unclear for some respondents;
- Most believe all the relevant stakeholders are involved in the process; although satisfaction regarding how well those beyond the advisory groups have been engaged does vary;
- Having a plan that can be implemented was the most important criterion for judging success; and
- Implementation will need to address the vision for the plans; funding availability and use a catchment approach to get joined up actions on the ground.

Background: Research Aims, Progress and Timetable:

The research is funded through the RERAD Environment: Land Use and Rural Stewardship Programme (2006 – 2011). The main research question is: How are collaborative management decisions negotiated, and how do these decisions deliver improved water quality and other objectives? We have worked with the five advisory groups (AG) -Argyll, Clyde, National, North-East, and Tweed - through the development of the draft plans, and are now interested in the process of finalising the plans and setting up implementation. Therefore, the research covers the Scotland and Solway-Tweed River Basin Management Planning processes.

Methods:

We have used different fonts to distinguish between the summary data from the questionnaire; 'direct quotes', the themes arising at the meetings; and our *interpretations* of what these data might mean.

Questionnaire Methods

The questionnaires were given out at meetings or emailed out between the end of November 2008 and March 2009. All those returned post 22nd December could have read the draft River Basin Management Plans (RBMPs) and Area Management Plans (AMPs). The responses rates are shown in the table below. The results only reflect the views of those who responded, not the entire group, so we refer to comments from respondents.

| Group | No of Returns | Response Rate |
|-----------------|---------------|---------------|
| Argyll | 9 | 41% |
| Clyde | 15 | 60% |
| Forth | 2 | 9% |
| National | 5 | 12% |
| North-East (NE) | 4 | 16% |
| North Highland | 5 | 20% |
| Orkney | 4 | 23% |
| Solway | 6 | 19% |
| Tay | 1 | 5% |
| Tweed | 7 | 21% |
| West Highland | 2 | 9% |
| | | 21% |

Observations & Document Analysis

We have reviewed our field notes, papers and the minutes available to us since August 2008. However, we were unable to attend five meetings; three meetings were cancelled, one was held by correspondence and we have not been engaged in any bi-lateral meetings or working groups. When referring to what was said at the meetings, we refer to members (of the advisory groups).

Main Findings:

The findings are summarised below, combining the questionnaire and observation results. *The three main themes we would emphasise are:*

- Making the Area Advisory Group (AAG) meetings more locally relevant and focussed on locally specific issues*
- Improving the relationship between the National Advisory Group (NAG) and AAG, and providing mutual support between the two*
- Focussing on 'doing' and working in partnership rather than discussing procedure or 'ticking boxes' to comply with the Directive.*

These themes have been discussed with the River Basin Coordinators. Many issues are already being addressed and further actions have been identified for the implementation stage.

Motivations of the Advisory Group Members

Overall the respondents from all groups stated various reasons of why they attended the meetings, ranging from requirement of their job to learning from others. The most frequently quoted reasons were that respondents felt it was

important to represent their group (24%) and wanted to shape the outcome of River Basin Management Planning (20%). The majority of respondents (80%) believed that the meetings are extremely or somewhat beneficial to their organisation.

There are two aspects arising from the meeting notes. Firstly, at meetings of the Argyll, Clyde, North-East and Tweed AGs, members made comments about the degree to which the suggestions made in the AAG meetings would be taken on board and whether the plans, or policies (e.g. the restoration fund) would be altered in response. Secondly, one member of Clyde group noted that implementation phase, particularly where there could be competition for resources, may shift group dynamics in future. *This might put a new slant on the fact that organisations want to influence the plans and represent own interests. Given these motivations for attending meetings, we argue that the lack of meetings – in person or by correspondence – with the NE AAG has been problematic. The group will to be brought up to speed with the progress made during 2009.*

Meeting Organisation and Coordination

Regarding information provision, over half of the respondents managed to read all provided material for upcoming meetings. There was some discrepancy however between respondents; with 40% disagreeing there was too much material and 30% agreeing. West Highland, North Highland, Solway, Tweed and the National respondents more frequently agreed there was too much material compared to the other AAGs. Several suggestions were made: the most frequent being to make the material shorter and more concise by using more bullet points and summaries. In general the majority of respondents think that the material they receive is well presented, useful and up to date, not too difficult to understand and is relevant. However it was noted by several (19%) that the information could be more relevant to the discussions during the meetings and to be more area specific.

The respondents are generally happy with the coordinators, noting a range of positive attributes. The most frequent comments were related to:

- their organisational and timekeeping skills,
- their clear and concise communication within and outwith meetings, keeping the group respondents up to date, and
- the co-ordinators' enthusiasm for encouraging discussion and getting respondents to take part.

There are a few things co-ordinators could do differently. These related to the relevance of the material and discussions for stakeholders (for example less discussion on the procedures; but more provision of summary points and highlighting the key points would be helpful). A further request was to provide the minutes earlier, thus more time to read through them. However, the workload of the co-ordinators was noted.

Likewise, the respondents are also pleased with the effort of the Chairs, frequently noting that they keep to the agenda and time, ensure that everyone gets involved and has their input into discussion, and encourage debate when it is needed. Some respondents (18%) made suggestions of what the Chair could do differently. The main issues related to managing discussions and highlighting the main points in a way that doesn't put a 'SEPA stamp' on the outcomes.

We commend the increasing number of presentations being given by other stakeholders; and the use of information papers to keep members informed about national and local initiatives of interest to them. *This should raise awareness that should help to achieve the integration of policies and plans with RBMP.* There have been many comments on the utility of the GIS tool on the RBMP website and more general comments on using 'e-planning' technologies to manage the data and information.

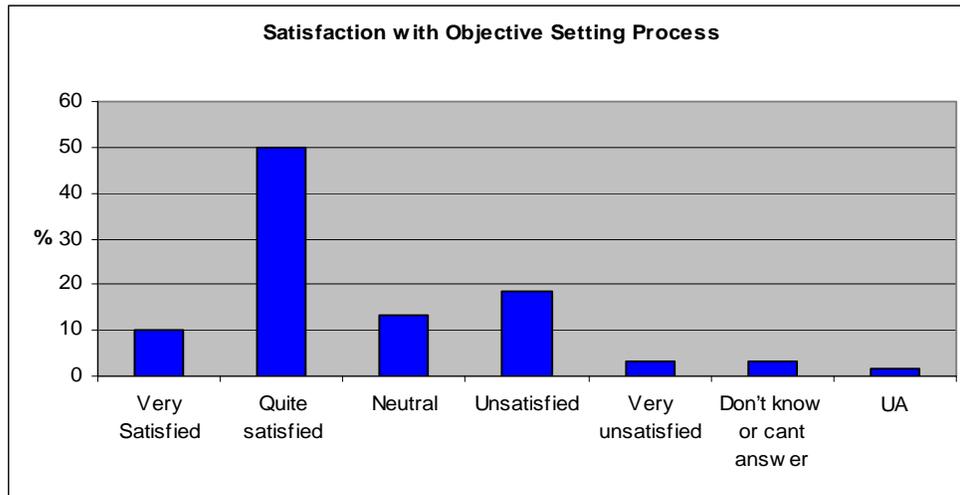
Developing the Plans

The attendance at working group meetings was split with 47% of respondents having attended at least one meeting. Over half (55%) agreed the outcomes of these meetings were reported back to their advisory groups (note: 30% did not answer this question, suggesting they might not know or have remembered).

Some stakeholders have been actively involved in writing the draft plans; including the Solway-Tweed model of using an editorial team. Useful feedback included the Tweed AAG who discussed the need for a plain English glossary to accompany the plans and papers – WFD compliant terms don't match the language that people living and working on the ground use.

The AAG members were able to see and comment on the process of setting draft objectives but not formally able to comment on the objectives before the draft RBMPs and AMPs were put out for consultation. There were a few comments about the level of ambition made at the Argyll, Clyde and North-East meetings – with a mixture of pleas for greater environmental improvements or a warning that Scotland risked becoming the "poor man of Europe" if the objectives were set too high. The NE group also wanted assurances that all of Scotland was being treated equally. *The findings about the level of ambition need to be viewed alongside the emphasis on implementation (see below) – to what extent is it possible to deliver greater environmental improvements when implementation is likely to be constrained by lack of resources?*

There were many differing views on the objective setting process, varying from respondents being very satisfied to very unsatisfied with the process across all groups. However the majority (60%) were either very or quite satisfied with the process. The respondents' views of focus and ambitiousness of the objectives in the draft plans varied. One third of respondents did not answer this question. Of those that did answer, 42% thought it needed to be more ambitious and focussed on the environment; but 24% felt objectives were about right.



It is understandable, that the contents of the plans continue to change as new data and information becomes available. In particular, the hydrology and morphology aspects of ecological status are being reviewed, and fish data added to the ecology parameters during 2009. The summary paper provided earlier this year to Argyll, Clyde, and Tweed groups has been very helpful in explaining these changes. The topics identified as needing more attention are:

- Invasive Non-Native Species
- Protected areas
- Heavily /Artificial modified water bodies – especially flood and coastal
- Groundwater and Marine water bodies (and links to new Marine Bill)
- Integration with the Flood Risk Management Bill (and flooding more generally)
- Integration with Land Use Planning
- Implications of climate change
- Acidification

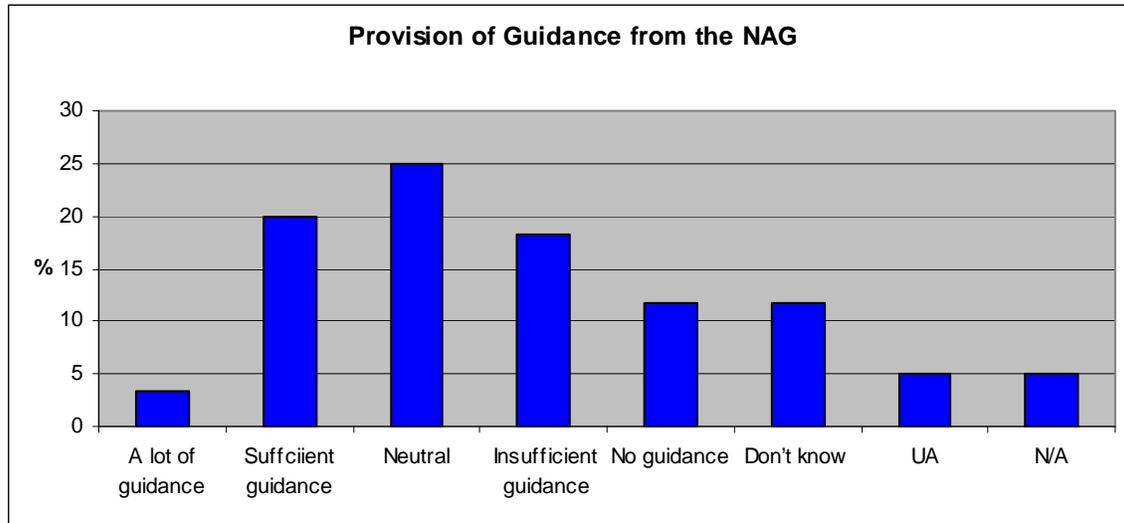
Linking the National and Area Advisory Groups

The AAGs respondents' views varied ranging from the NAG provides a lot of guidance to no guidance¹. There were some clear differences between the AAGs. The majority (57%) of Tweed respondents stated there was no guidance, 40% of Clyde respondents believe the guidance is insufficient but 75% of Orkney respondents think there is sufficient guidance. In terms of the NAG acting upon AAGs concerns most either stated neutral (28%) or don't know (27%).

The links between the NAG and AAGs were discussed at the NAG and Argyll meetings. *The provision of the information paper, illustrating the NAG agenda, should provide a*

¹ Although NAG respondents were not asked to complete the questions relating to the NAGs guidance and acting upon AAGs concerns one selected 'neutral' and one selected 'don't know', for both of these questions, whilst the rest put N/A.

mechanism to keep the AAGs informed, but will need to be complemented by feedback on what the NAG has decided and how it relates or guides the work of the AAG.



Representation of Different Interests on the Advisory Group

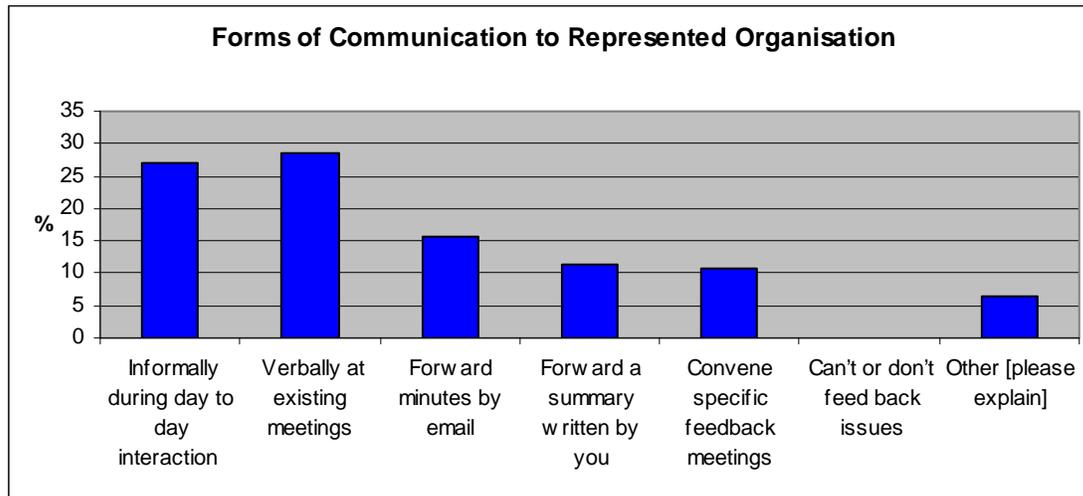
The NAG group meeting highlighted some missing stakeholders who need to be engaged e.g. individual local authorities; building industry; other industry; tourism and sporting interests. These mirror suggestions made in 2006 at the initial NAG and AAG meetings. The solution was to engage them through the forums, although *the forum solution may not achieve a national perspective from these sectors.*

The respondents' views of representation at advisory groups were generally alike. The majority think that all individuals or organisations that should be present at such meetings do already attend (72%); do contribute enough (63%); and no particular individuals or organisations dominate the meetings (75%). The exceptions to these views are displayed in the table below.

| Should be Present | Do not Contribute Enough | Dominate at Meetings |
|------------------------------------|--------------------------|----------------------|
| Economic and social experts | Coastal forum reps | Agriculture |
| Community councils | SGRPID | Fisheries |
| Local golf courses | Port authorities | Land Management |
| Environmental health | NGOs | SEPA |
| Tourism sector | Environmental groups | EA |
| Local authority | Land managers | Tweed Foundation |
| Building trade | Business | |
| National Trust | Local authorities | |
| Commoners Association | | |
| Appropriate university departments | | |

Reaching Out to Other Stakeholders

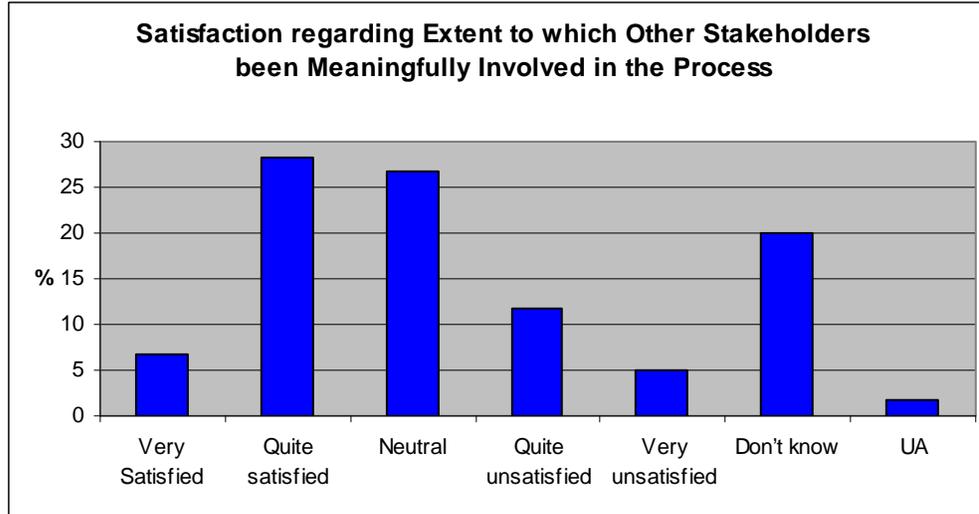
The graph below shows how respondents use a range of communications to inform the organisation or group they represent.



The website is seen to be a somewhat effective means to provide information to other stakeholders by the majority of the respondents (55%) with only 14% thinking it is somewhat or very ineffective. The forums are also thought of as a useful approach to communicate to other stakeholders with 67% of respondents stating the forums are well used or used to some extent.

The views regarding whether other stakeholders were meaningfully involved in developing the plans varied. The most negative responses were from the North East respondents and the most positive came from the Orkney, Forth, West Highland and Clyde groups. The other groups provided a range of answers.

The meeting data suggest the consultation packs were successful in stimulating awareness raising and information provision. The 'round the room' feedback seems to have been useful in prompting action and sharing information. We also note that there has been more stakeholder engagement than formally reported.



There were three main themes regarding how to increase stakeholder involvement; PR including newsletters, presentations, radio advertisements, forums; engagement through training seminars and site visits and having a more local focus. Respondents suggested that it should be SEPA who should organise and carry out such activities, in partnership with AAG respondents; although land managers and environmental organisations were proposed for site visits and training. Further methods of increasing involvement included organising more targeted meetings for specific groups by AAG members. A couple of respondents felt that using grants, provided by the Scottish Government, would engage people in delivering measures.

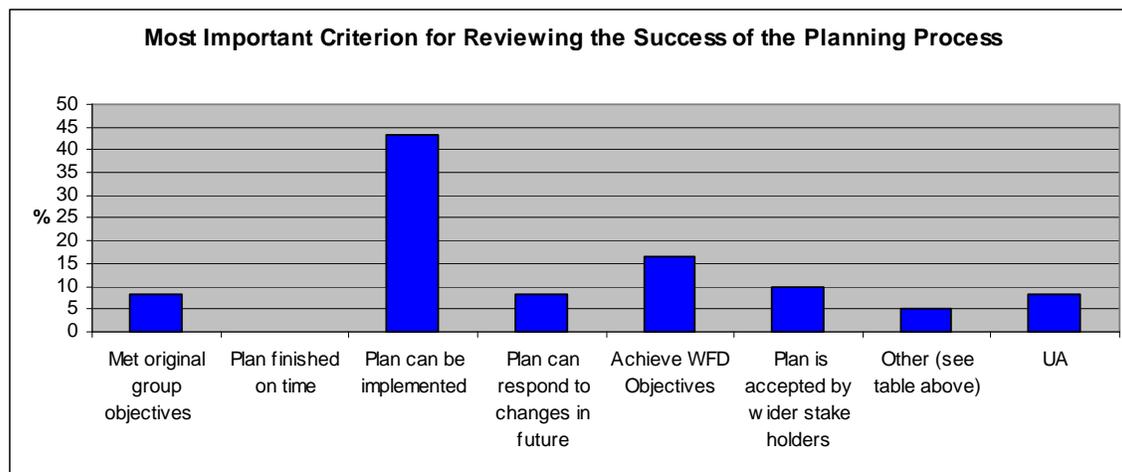
Measuring Success

The respondents of the groups all view that all the following objectives;

- Met original group objectives,
- Plan finished on time,
- Plan can be implemented,
- Plan can respond to changes in future,
- Achieve WFD objectives,
- Plan is accepted by wider stakeholder

are important to some extent, with essential ticked for each objective apart from 'met original group objectives' and 'plan finished on time'. Other criteria suggested can be viewed in the table below. One respondent questioned whether 'Plan can be implemented' and 'achieve WFD objectives' are the same thing stating that 'if the objectives have been set but cannot be implemented it suggests something is wrong with the planning process'.

| Other Important Criteria to Review the Success of the Planning Process |
|--|
| <ul style="list-style-type: none"> Plan delivers proportionate responses that have a minimal impact on the wider environment and are based on sound data. |
| <ul style="list-style-type: none"> Takes into account all objectives of WFD including economic & social effects of suggested environmental improvements |
| <ul style="list-style-type: none"> Plan has measurable targets, attainment/ failure of which can be held responsible to action of particular sectors |
| <ul style="list-style-type: none"> Plan delivers objectives and other policy legislation |
| <ul style="list-style-type: none"> Achieves real environmental benefit-Must start to address key problems like surface water acidification |
| <ul style="list-style-type: none"> Links to other planning processes |



Given the focus on delivery, the discussions about funding are very important. Comments about access to SRDP and the restoration fund were made at all meetings. More general comments were also made about linking the level of ambition to the availability of funding to implement proposed measures. *There is a tension between encouraging catchment based, collective action to resolve problems and getting SMART plans agreed. The former is required to identify things that fall through the gaps of organisational remits and individual actions; but the later generally needs agreement by an organisation or individual, unless an existing partnership exists. We recommend you adopt a catchment-based approach as this is the best way to get joined up and integrated action for environmental outcomes. It does, however, take longer to get agreement. On this note, we commend the NAG workshop report for clearly identifying actions and resources. However, this is by organisation, and further work is required to get these organisations working in partnership at the NAG level.*

At earlier meetings, participants requested practical examples to focus the discussion on specific, local examples. *We believe that the use of catchment focussed subgroups, bringing in 'on the ground' stakeholders, helped to get more positive engagement by*

members and make the planning process more tangible to them. We believe you plan to use this process in the implementation phase, by holding catchment review meetings. These will be geographically, not pressure or sector, based analyses of classification results, objectives and measures.

There has been little explicit discussion about the vision for RBMP or the benefits that an improved water environment brings to Scotland at AAGs, although this was a strongly voiced view at the last NAG meeting (October 08). *Given the current economic climate and potential that environmental improvements might be seen as 'too expensive' we would recommend explicit discussion of the vision and benefits at future meetings.*

Other Comments from the Questionnaire

Several respondents made further comments regarding the progress of the planning process. These views can be grouped within four categories; relevance to those attending, stakeholder involvement; assumptions made by SEPA/EA and frustration with the process. The key issues raised regarding relevance are that there is insufficient discussion on certain issues (e.g. coastal fishing) and discussion needs to be continued regarding characterisation and classification. It was noted that there is not enough discussion on local issues, for example, on particular sectors. On the other hand it was felt some aspects are laboured over too much, such as procedures. Finally, a couple of respondents felt there was a lack of a wider vision regarding the aims of the WFD. Regarding stakeholder involvement, issues raised included the need for more relevant stakeholders to take part in particular those with local knowledge, for example land managers and also larger resource users, i.e. large scale hydro. Conversely it was commented that the network developed by the Tweed Forum allows for an inclusive approach involving all key stakeholders by the Tweed AAG. *These comments illustrate that although most are satisfied with the stakeholder engagement to date, there are some areas that need work.* Some respondents view that SEPA make assumptions about delivery of measures, such as Scottish Water Projects. A respondent also questioned whether the EA's reliance 'a self selecting group of stakeholders that doesn't include land managers' might skew their analysis. A further comment made by some respondents was that they felt the AAGs are a 'talking shop' and that it was just a 'box ticking exercise'. This is somewhat at odds with the generally positive feedback by respondents. *It does highlight the enthusiasm to move into the implementation phase.* For a full account of these comments please see appendix.

Update on Overall Research Programme

General updates on the overall research programme delivery regarding natural, economic and social science for managing water are given at the Catchments Research Coordination Group (<http://www.macaulay.ac.uk/water/KTcrpg.php>). The research website is: <http://www.programme3.net/water/>

| Appendix One: Further Comments made by Questionnaire Respondents | |
|---|---|
| Argyll | The format of the AAG's has worked up to a point where there was a need to raise the awareness of the members of the groups and keeping them informed of developments of the process. The groups have not worked in developing collaborative working to address specific issues and this is primarily due to the way SEPA has presented the issues as sector specific pressures rather than identifying the parameter that is causing the downgrading (e.g. phosphorous) and trying to get a cost effective measure or combination of measures. The groups are also too regionally spread i.e. there is insufficient local knowledge across all areas to address local issues |
| | It appears that the larger resource users such as large-scale hydro have elected to not participate in wider group objectives and there is no or little transparency in how SEPA is reviewing car licenses with these operators. |
| Solway | I think you'll get the message that this process has been somewhat frustrating at this stage from an environmental perspective. There is so much good vision and statement in the WFD, that it is a disappointment that the Solway-Tweed plan is so unambitious. Naturally, there are a number of reasons for this, from over expectation on our part to under-achievement on the part of the plan; and the lack of financial resources is an easy scapegoat to blame at this stage. However, one has to remain optimistic and hope for better things in future, but so far it's all been about traditional areas of water quality work, rather than the wider vision of WFD and integration with other mechanisms and sectors. The AAG has therefore been largely a rubber stamping exercise in my view. |
| | I am somewhat concerned that specific issue advisory groups to which EA refers tend to be self-selecting, and therefore give a biased slant on what should be straightforward information. Land users (or stewards) do seem to be under-represented; bearing in mind so much of the management's plans involve their co-operation in changes to land management. |
| Orkney | There is insufficient regard for local issues & desirable outcomes too centrally directed. |
| Tweed | Although process may feel rushed to SEPA, actually seen very thorough & perhaps some areas have been laboured too much. Too many meetings with this agenda. Due to AAG/ TF relationship forum meetings have suffered- less of them & had to cut back agendas to recognise stakeholders only have so much time for partnership working. Implementation phase should be more engaging as this is where TF is at and what members want to see and do. |
| | The secretarial/ support/ contact network: That provided by Tweed forum (for Tweed AAG) is priceless. It enables TWEED AAG to operate in a really inclusive manner with all key stakeholders and for the RBMP to be real in a manner unachievable elsewhere (So effectively/quickly) |
| West Highland | SEPA should clearly not make assumptions about delivery of SW projects which get internally approved and promoted on to our programmes. Delivery will only come when projects attain sufficient priority and funding is confirmed and becomes available through the Business |

| | |
|-----------------------|--|
| North Highland | There are a number of issues that have been raised on several occasions which I don't feel have had a satisfactory answer. Firstly, inshore fishing is an activity which is highly likely to adversely impact on the ecological status of the large areas of coastal water bodies; however this issue appears to have been completely avoided in setting the objectives for these water bodies. Secondly the ecological status of many of our rivers appears to have been determined as good when we have vast tracts of upland areas where the watercourse are unnatural due to overgrazing and a lack of riparian woodland, again this issues does not really seem to feature in the measures. |
| | Delivery is a huge issue, both in terms of getting stakeholders on board, but more critically in terms of lack of available funding. |
| | SEPA should not make assumptions about Scottish Water project delivery. This list of projects will be finalised through the Quality and Standards process. |
| | Weaknesses in characterisation need to be addressed. |
| North East | The format of the AAG's has worked up to a point where there was a need to raise the awareness of the members of the groups and keeping them informed of developments of the process. The groups have not worked in developing collaborative working to address specific issues and this is primarily due to the way SEPA has presented the issues as sector specific pressures rather than identifying the parameter that is causing the downgrading (e.g. phosphorous) and trying to get a cost effective measure or combination of measures. The groups are also too regionally spread i.e. there is insufficient local knowledge across all areas to address local issues |
| | This has been one of the most hopeless & frustrating exercise I have ever had the misfortune to participate in. Key issues are dodged/fudged, few relevant people are present & the whole thing seems to have been more of a "box of ticking" exercise than any real attempt to sort out N/E water issues |
| Tay | "Plan can be implemented" and "Achieve WFD Objectives" – are these not the same thing, as if the objectives have been set but cannot be implemented, it suggests something is wrong with the planning process. Also, for a plan to implemented ("implementable") then it must be able to respond to changes that occur within the plan period – it would be a very naïve plan that assumed the whole world stands still. The test of these river basin plans will be whether they can be implemented and deliver the stated objectives. |
| Clyde | Accessibility of relevant information for specific areas is important and not yet adequate. |
| | There is a real feeling that the AAGs are a talking shop only. There needs to be consideration on how SEPA can really get stake holders engaged in the process & in implementation. An interesting comparison is the SSMEI plan development. That plan is not perfect. But the group feels it has been involved and influential. |
| Forth | No comments made |
| National | No comments made |