

EAST AYRSHIRE COUNCIL

DEVELOPMENT AND PROPERTY SERVICES COMMITTEE: 11 January 2006

SCOTTISH EXECUTIVE - IMPLEMENTING THE WATER ENVIRONMENT AND WATER SERVICES (SCOTLAND) ACT 2003: DESIGNATION OF RESPONSIBLE AUTHORITIES – A DISCUSSION PAPER

Report by Executive Director of Development and Property Services

1 PURPOSE OF REPORT

- 1.1** To inform Committee of the Scottish Executive (SE) Implementing the Water and Water Services (Scotland) Act 2003: Designation of Responsible Authorities – a Discussion Paper, and note the Roads & Transportation Division's response.

2 BACKGROUND

- 2.1** In July 2005, the Scottish Executive issued a discussion paper on the designation of Responsible Authorities under the Water Environment and Water Services (Scotland) Act 2003 (WEWS). This discussion paper set out one aspect of the Scottish Executive's proposals for the implementation of the requirements of WEWS and how the Scottish Executive envisages the role of Responsible Authorities.
- 2.2** WEWS transposed the EC Water Framework Directive (WFD) into Scots Law. The aim of the Act is to protect and restore where possible the ecological status of the water environment.
- 2.3** One element of secondary legislation is the designation of Responsible Authorities. The power to designate Responsible Authorities is to be found under Section 2 of the Act. The aim of designating Responsible Authorities is to ensure that public bodies whose plans and activities impact on the water environment carry out their activities in a way that secures compliance with WFD objectives. The aims and objectives of the WFD are as follows:
- An integrated approach to water management,
 - To protect and promote the ecological health of the water environment across Europe,
 - The identification of River Basin Districts – a source to sea approach,
 - Participation'
 - Good ecological status for all water where possible.
- 2.4** The Scottish Executive has stated that the primary means of achieving the WFD objectives will be through the introduction of river basin management plans (RBMP).

3 DESIGNATION OF RESPONSIBLE AUTHORITIES

- 3.1** The purpose of such a designation is to ensure that those public bodies carry out their functions in a way that is not contrary to achieving the objectives of the WFD and promotes a sustainable approach to managing the water environment.
- 3.2** Bodies that are proposed for designation are Local Authorities, Scottish Water, Scottish Natural Heritage, National Park Authorities, The Forestry Commission, District Salmon Fishery Boards, British Waterways and Port Authorities. The Scottish Executive anticipates that the order designating Responsible Authorities will be laid in the Scottish Parliament in 2005.
- 3.3** The key duties of Responsible Authorities, as set out in Section 2 of WEWS, are as follows:
- to ensure compliance with the WFD when carrying out their designated functions;
 - to have regard to the social and economic impact that may result from carrying out those functions;
 - where it is consistent with the purpose of a function;
 - a) promote sustainable flood management,
 - b) act in a way best calculated to contribute to the achievement of sustainable development,
 - c) adopt (if practicable) an integrated approach by co-operating with other Responsible Authorities with a view to co-ordinating the exercise of their respective functions.

SEPA and Scottish Ministers will also be required to fulfil these duties when exercising their functions under relevant enactments which will be undertaken as a separate exercise.

4 RESPONSE TO DISCUSSION PAPER

- 4.1** The discussion paper provides the key requirements, interpretation, key actions and benefits and examples. Appendix 1 gives a detailed response to the discussion paper.
- 4.2** What is apparent is that there will be a requirement for closer working relationships between the Responsible Authorities. This is proposed to be delivered through the use of memoranda of agreements facilitated by the Scottish Executive.
- 4.3** It is clear that new work practices and protocols will be required to be put in place within different departments of the Council to facilitate the achievement of the aims and objectives of the WFD.
- 4.4** As the Water Framework Directive's aims and objectives are water environmentally driven, there is a great concern that the social and economic impacts will not carry equal weight in the planning decision making process.

4.5 EAC as a Responsible Authority is expected, by the Scottish Executive, to be a key participant in the development of RBMP. Consultation is anticipated to begin in 2006.

4.6 In planning terms the timing of consultation on River Basin Management Plans in 2006 is important as it is likely that the Council's Consultative Draft Local Plan will be put out for public consultation during spring 2006. It would be useful if the Local Plan consultations and those on the River Basin Management Plans could be done in tandem so that they can closely inform one another.

5 Link to Community Plan

5.1 Improving the environment and improving health.

6 LEGAL IMPLICATIONS

6.1 The designation of Responsible Authorities is contained in Section 2 of the Water and Environment Services Act 2003.

7 FINANCIAL IMPLICATIONS

7.1 There will be financial implications for the Council as a 'Responsible Authority'. These cannot be quantified at this moment. It is not known whether additional funding will be provided by the Scottish Executive for the implementation.

6 RECOMMENDATIONS

6.1 The Committee is requested to note to the Scottish Executive: the detailed response at Appendix 1.

6.2 The Committee requests that the Executive Director of Development and Property Services in consultation with the Leader of the Council and the Chair of the Development Services Committee refers the matter to COSLA for further consideration.

James Lavery

Executive Director of Development and Property Services

BACKGROUND PAPERS

Appendix 1 – Scottish Executive Implementing the Water and Water Services (Scotland) Act 2003: Designation of Responsible Authorities – a Discussion Paper, EAC response.

For further information on the contents of this report, please contact John McRobert, Roads & Transportation Division, on 01563 576310

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EAST AYRSHIRE COUNCIL

ROADS AND TRANSPORTATION DIVISION

APPENDIX 1

East Ayrshire Council's response to the Scottish Executive Environment Group's "Implementing the Water Environment and Water Services (Scotland) Act 2003: The Designation of Responsible Authorities – A Discussion Paper, July 2005".

SECTION 1: REQUIREMENTS

Requirement No 1:

"The Responsible Authorities must exercise their designated functions so as to secure compliance with the requirements of the Directive"

1.01 Interpretation

When a public body plans to carry out a function that may impact directly or indirectly on the water environment they act with the objectives of the Water Framework Directive (WFD) in mind. The Scottish Executive proposes that this should be a simple straight forward mechanism and is designed to put an extra emphasis on consideration of the Water Framework Directive (WFD) and the water environment.

1.02 Key Actions:

The Scottish Executive envisages that Responsible Authorities would be required:

- 1.02.01** To seek advice from SEPA where there may be potential implications for the water environment;
- 1.02.02** Avoid carrying out their functions in a way that is contrary to the aims and objectives of the WFD;
- 1.02.03** To have regard to the River Basin Management Plan (RBMP).

1.03 Benefit: More Effective Consideration of WFD Objectives.

The Scottish Executive considers that one of the greatest benefits to be gained from designating Responsible Authorities is the opportunity for more effective consideration of WFD objectives within the internal workings of the public body and earlier consultation and discussion with SEPA and other Responsible Authorities.

EAC Response to Requirement No 1

- 1.04** Local Authorities have their designated functions defined in law/statutes etc, for example "Roads (Scotland) Act 1984". Will there be an exercise to amend all legislation that the Local Authorities operate under to include the requirements of the Water Framework Directive to ensure that Local Authorities do not operate in a way that is contrary top the aims and objectives of the WFD ?

- 1.05** What are the aims and objectives of the WFD as they apply to Responsible Authorities? Has a definitive list been drafted to identify clearly targets etc to be achieved? What will the impact be on the standard of content and preparation of Local and Structure Plans, will these plans now need to be re-drafted? How can Local Authorities take cognisance of RBMP when re-drafting their plans when the timescale for the RBMP is not until 2008 (SECTION 5).
- 1.06** The Scottish Executive suggests that this should be a simple straight forward mechanism to implement securing compliance with the WFD. EAC would not agree with this. There is no information as to what data, on watercourses, land use etc; Local Authorities have to have in place. Will the Scottish Executive outline the type and extent of data to be held by all Local Authorities, to ensure a consistent integrated approach, and who is going to fund this data collection, storage, updating etc.
- 1.07** What status will the advice from SEPA have with respect to potential implications on the water environment? Will SEPA have the legislative powers to insist certain works are included in river works, housing development proposals etc and will SEPA be able to “call in” a development that they perceive as having insufficient regard to the WFD?
- 1.08** Having regard to RBMP does not fully identify the role that the Local Authorities will have in the development and application of the RBMP. There will be a cost associated with this.
- 1.09** The Scottish Executive has indicated that one of the greatest benefits from designation is the opportunity for more effective consideration of the WFD objective within the internal workings of the public body. For this to happen there has to be a widespread knowledge and understanding of the WFD and new work practices and protocols will have to be developed within various departments of the Local Authority. There is a cost associated with this.
- 1.10** EAC would agree that early consideration of WFD requirements are essential as part of the Strategic Environmental Assessment of Local Plan policies and proposals to inform the review of Local Plans. EAC will have to incorporate references to the new responsibilities in that review. EAC has spoken to the Ayrshire Joint Structure Plan team and they are fully aware of the requirements of the Water Framework Directive and have been discussing with Scottish Water the implications on water regime of future development requirements in Ayrshire to ensure co-ordination of these with WFD provisions. One possible mechanism for incorporation of such requirements will be through identification of appropriate local development sites and infrastructure in the Local Plan review.
- 1.11** As an aside, with Scottish Water being proposed as a Responsible Authority, given their downsizing in personnel numbers, will Scottish Water be able to cope with the new envisaged early co-ordination activities?

- 1.12** Is there to be a transitional period for the implementation of the WFD. For example, where there has been a substantial ongoing planning application for either a retail or housing development for example, will WFD requirements be applied retrospectively?

Requirement No 2:

“In securing compliance with the requirements of WFD Responsible Authorities must have regard to the social and economic impact of exercising their functions”

2.01 Interpretation

The WFD focuses upon the water environment but the Scottish Executive expects Responsible Authorities to also consider the social and economic value of an activity to ensure that the correct balance is achieved.

2.02 Key Actions:

To ensure compliance with WFD, such as having regard to RBMP or going to SEPA for advice, a Responsible Authority would have to:

- 2.02.01** Recognise that ‘less stringent objectives’ can be set under the WFD (to be set down in the RBMP and signed off by Scottish Ministers);
- 2.02.02** Ensure that they have regard to the social and economic impact of exercising their own functions;
- 2.02.03** Aim to achieve the most appropriate balance between protection of the water environment and social and economic impacts when exercising a function that may impact on the water environment.

2.03 Benefit: A Balanced Approach.

The rationale for requiring Responsible Authorities to consider the social and economic value of an action is to ensure that in implementing WFD, economic and social considerations are taken into account in the protection of the water environment.

EAC Response to Requirement No 2

- 2.04** EAC has a real concern about environmentally driven targets. The WFD is primarily concerned with the water environment, that is the priority, and SEPA being the lead, will be equally minded.
- 2.05** Do the other proposed Responsible Authorities, SEPA, SNH etc fully appreciate what social and economic pressures that Local Authorities operate under. How is this value going to be measured to ensure a correct balance is achieved?

EAC’s current strategy seeks to stem the flow of out-migration, to build on a revised business development portfolio and to offer improved housing choice in order to stabilise the population at current levels. This will involve the approximate provision for an additional 13,000 houses in the period 2005 to 2025. This scale of housing allocation, it has been estimated, would allow for a stabilisation to the current

population figure in 2005 of around 120,000. This is an example of some of the **social** and **economic** pressures that EAC has to deal with.

As a responsible Local Authority, EAC has to put in place Flood Prevention Schemes to mitigate the effects of flooding for **social** and **economic** reasons not just **environmental** reasons, to retain good housing stock and to retain businesses thereby preserving and enhancing employment.....flood prevention schemes can also have the added bonus of releasing land, in particular brownfield sites, for development opportunities.

- 2.06** It is acknowledged that the implementation of WFD through the River Basin Management Plans the social/ economic impacts of the local water systems will have to be taken into account. These will be an important consideration in the preparation of Sustainability Appraisals which EAC are required to carry out for preparation of the new Local Plan. EAC would stress that protection of the water environment and economic development should not be regarded as mutually exclusive. For example it is recognised that the value of the riparian environment is important to local communities and can, in certain circumstances, lead to significant social/ economic benefits through implementation of programmes of recreational/ amenity and nature conservation projects.
- 2.07** Under what conditions can “less stringent objectives” are to be considered? Can EAC reflect “less stringent objectives” in their Structure and Local Plans?

Requirement No 3:

“In securing compliance with WFD and as far as is consistent with their designated functions Responsible Authorities must promote sustainable flood management.”

3.01 Interpretation

When carrying out any designated function that has an impact on flooding, Responsible Authorities will need to ensure that they promote sustainable flood management. Following the published report, dated March 2003, of the ‘COSLA Flood Task Group (EAC being a co-author) a National Technical Advisory Group (NTAG) was established in November 2003 and their definition of sustainable flood management was:

“Sustainable flood management provides the maximum possible social and economic resilience against flooding, by protecting and working with the environment, in a way which is fair and affordable both now and in the future.”*

* ‘resilience’ means: ‘able to recover quickly and easily’. The Scottish Executive uses it to deliver the ‘four As’ of sustainable flood management: Awareness + Avoidance +Alleviation +Assistance.

NTAG has also produced a set of objectives and a set of principles for sustainable flood management and work has started on developing measurable indicators.

3.02 Key Action:

3.02.01 The Scottish Executive envisages that Responsible Authorities, in relation to their designated functions, would be required to comply with advice issued on sustainable flood management when making any decisions regarding flood risk management.

3.03 Benefit: Sustainable Flood Management.

This requirement would ensure that any flood prevention measures taken in the future work as closely with the natural environment as possible, ensuring its protection for future generations.

EAC Response to Requirement No 3

3.04 EAC supports the philosophy of the promotion of sustainable flood management. Best practice guidance issued by the Scottish Executive would be advisable. This philosophy should also be embraced in the Structure and Local Plans and in the promotion of flood prevention schemes.

3.05 How are Responsible Authorities going to communicate the philosophy of the promotion of sustainable flood management to the wider community for example, in-house departments, developers, consultants etc? Who is going to pay for the education of the wider community?

3.06 Currently NTAG has produced twelve principles for sustainable flood management with between two and four performance indicator for each principle (total of between twenty four and forty eight indicators). For the Scottish national road condition survey there is only one indicator based on red, amber and green. EAC's view is that the amount of principles and associated indicators being developed is totally unacceptable and requires rationalisation.

Requirement No 4:

“In securing compliance with WFD and so far as it is consistent with their designated functions, Responsible Authorities must act in the best way calculated to contribute to the achievement of sustainable development.”

4.01 Interpretation

When carrying out their designated functions, Responsible Authorities will have to ensure that they are contributing to the achievement of sustainable development. The Scottish Executive accepts that views vary over its definition and requirements and focus of an individual body tends to determine how they perceive sustainability.

The Scottish Executive defines sustainable development as “development that meets the needs of the present without compromising the ability of future generations to meet

their own needs.” So the Scottish Executive’s vision is based on the principles that we should:

- Have regard for others who do not have access to the same level of resources, and the wealth generated;
- Minimise the impact of our actions on future generations by radically reducing our use of resources and by minimising environmental impacts;
- Live within the capacity of the planet to sustain our activities and to replenish resources which we use.

The Scottish Executive recognises that several proposed bodies, including Scottish Natural Heritage, already have a duty to promote sustainability when exercising their functions.

4.02 Key Actions:

4.02.01 A number of the bodies proposed for designation are already subject to a requirement to promote sustainable development, for example, Scottish Water were issued guidance from Scottish Ministers to carry out the requirement to promote sustainable development under the Water Industry (Scotland) Act 2002.

4.02.02 The Scottish Executive wants a Scotland that delivers sustainable development that puts environmental concerns at the heart of public policy. Public bodies are expected to follow best practice and ensure that they are working to improve environmental performance, adopting suitable environmental management policies and setting appropriate targets of objectives.

4.03 Benefit: Sustainable Development

The Scottish Executive emphasises that sustainability is a core principle of the WFD and this duty allows it to be integrated into the decision making process of all public bodies on the water environment.

EAC Response to Requirement No 4

4.04 Referring to ‘Scottish Planning Policy 1: The Planning System’ (SPP 1), EAC already has to take cognisance of sustainable development in the planning process although SPP 1 makes no reference to the water environment. SPP 1 will require amending.

4.05 Referring to the ‘Local Government in Scotland Act 2003 – Sustainable Development Advisory Note’, the duty of best value requires that “*the Local Authority shall discharge its duties under this section in a way which contributes to the achievement of sustainable development.*” This Act (and advisory note) is also considered by Local Authorities in their ‘considerations’, but again there is no direct reference to the water environment.

4.06 The Scottish Executive wants a Scotland that delivers sustainable development that puts environmental concerns at the heart of public policy. Surely social and economic considerations should carry equal weight at the heart of [public policy].

- 4.07** In order to consider sustainable development, Local Authorities will have to have sufficient information of the water environment, for example, modelled watercourses, ground water behaviour, behaviour of Scottish Water network under testing wet conditions. What information, type and extent, should be collected, etc. There is a cost associated with this.

Requirement No 5:

“In securing compliance with the Directive and so far as is practicable, Responsible Authorities must adopt an integrated approach by co-operating with each other with a view to co-ordinating the exercise of their respective functions.”

5.01 Interpretation

The Scottish Executive suggests that this requirement is currently common place amongst some of the proposed bodies. The Scottish Executive proposes that memoranda of agreement are set up between public bodies where this would achieve joined-up working on relevant areas. This is to be facilitated by the Scottish Executive.

5.02 Key Actions:

In situations where the actions of a Responsible Authority are likely to impact on the water environment and other Responsible Authorities may be involved, those Authorities should:

- 5.02.01** Contact each other at an early stage in the process (for example SEPA);
- 5.02.02** Keep each other updated on plans/work and highlight any possibility of conflict or duplication;
- 5.02.03** Work together where necessary;
- 5.02.04** Abide by any memoranda of understanding.

5.03 Benefit: Co-ordination

The Scottish Executive emphasises that it is important that Responsible Authorities co-ordinate work with one another to ensure conflicting decisions are not taken and work is not duplicated.

EAC Response to Requirement No 5

- 5.04** Why is there a change from “designated functions” in Requirement No 1 to “respective functions”? Clarification required.
- 5.05** EAC suggests that a voluntarily arrangement to an integrated approach for joined-up thinking and co-ordination between Responsible Authorities would come unstuck. The proposal for memoranda of agreements would be acceptable provided that clear actions and responsibilities are identified and that there is a mechanism for dealing with those Responsible Authorities who do not participate or participate timeously in the agreements and that a system is put in place to monitor the effectiveness of such agreements. Further consultation with Responsible Authorities would be required on

the content and production of memoranda of agreements. Local Authorities legal departments would also be involved. Development and implementation of 'Integrated approaches etc' require funding.

- 5.06** As regards the Council's planning responsibilities and those of the Roads & Transportation Division regarding engineering works such co-ordination is already occurring through development of major sustainable flood management schemes (see above) and formal consultation procedures for deciding planning applications and the review of the Local Plan and Structure Plan.

SECTION 2: BODIES CONSIDERED FOR DESIGNATION

6.01 Proposed Bodies

The Scottish Executive proposes to designate the following bodies as Responsible Authorities in 2005:

Local Authorities, Scottish Water, Scottish Natural Heritage, National Park Authorities, The Forestry Commission, District Salmon Fishery Boards, British Waterways and Port Authorities. These bodies are expected to be key players in the development of river basin planning and so co-operation will be essential. Participation in RBMP is not a primary aim of designation but will be an important outcome and an additional benefit.

6.02 The Scottish Executive has stated that Local Authorities:

- 602.01** Carry out a range of functions that could impact on the water environment. Along with their planning functions, they have responsibilities in relation to reservoirs and flood management;
- 602.02** Will need to co-ordinate the granting of planning permission with SEPA and consider WFD when dealing with urban design and construction standards;
- 602.03** Under the Reservoirs Act 1975 inspect reservoirs and as Responsible Authorities they would consider the environmental impact of the safety inspections and any work undertaken as a result;
- 602.04** Have powers to control flooding under the Flood Prevention (Scotland) 1961.

EAC Response to Section 2

- 6.03** Local Authorities have other functions that could impact on the water environment, for example, roads, waste management and housing. Consideration will have to be given to integrate these functions. Costs associated with this.

Referring to roads, it has long been recognised that road drainage can impact on the water environment. This is borne out by the increasing promotion and use of sustainable urban drainage systems being incorporated with new developments, although there is a problem with responsibility and maintenance of such systems. Although the Local Authority Roads Departments provide drainage for roads (Section 31 Roads (Scotland) Act 1984 there is no legislative requirement for Local Authorities Roads Departments to provide and maintain SUDS.

Will it still be 'responsible' for Roads Authorities to discharge untreated, contaminated water from existing road drainage without SUDS, as at present? Clearly there are major cost implications if this has to be addressed. What about winter gritting? Will alternative to 'road salt' need to be considered? This is an ongoing problem.

- 6.04** The co-ordination of the granting of planning permission with SEPA and the consideration of WFD when dealing with urban design and construction standards will require to be clarified. What protocols will be put in place to deliver this? Will the Local Authority Planning Department still have the legislative authority to grant planning permission? What knowledge and experience does SEPA have in urban design and construction standards? Surely construction standards are controlled by Local Authorities 'Building Standards' department? Clarification required on these points.
- 6.05** Under the Reservoirs Act 1975 Local Authorities do not inspect reservoirs. This is undertaken by registered Panel Engineers. Owners of reservoirs are primarily responsible for arranging inspections etc. Depending on the size of the reservoir etc, Local Authorities register reservoirs under the Act.
- 6.06** What role is envisaged for the proposed 'Regional Transport Partnerships' to be created under the Transport (Scotland) Act 2005?
- 6.07** Where does the management of the Trunk Road network fit in with the aims and objectives of the WFD?
- 6.08** Will the rail authorities have an impact on the aims and objectives of the WFD?
- 6.09** Has the role of Rivers Trusts and Angling Associations been given any thought?

SECTION 3: PROPOSED FUNCTIONS

- 7.01** The Designation Order for Responsible Authorities that will be laid in Parliament will not only list bodies but also legislation that sets out functions relating to the water environment for those bodies.

EAC Response to Section 3

- 7.02** In addition to the legislation listed EAC would have expected to see:
 The Roads (Scotland) Act 1984;
 Transport (Scotland) Act 2005;
 Scottish Planning Policy 7 – Planning and Flooding

The above will have to be reviewed to take cognisance of the water environment.

SECTION 4: ISSUES FOR RESPONSIBLE AUTHORITIES

- 8.01** The Scottish Executive has indicated that Responsible Authorities may wish to develop internal guidance or provide training for their staff on WFD matters.
- 8.02** Once comments have been received on this discussion paper, The Scottish Executive's policy for Responsible Authority designation will be published in a statement. This will include a costs and benefits analysis that will assess the costs Responsible Authorities are likely to incur and the benefits of being designated.

EAC Response to Section 4

- 8.03** EAC acknowledges that there will be resource implications in terms of costs and personnel required to fulfil its duties as Responsible Authorities. How will the additional resources required be funded?
- 8.04** As an example and as previously highlighted, to promote and implement sustainable flood management objectives, EAC network of watercourses would require to be modelled, overland flows and possible behaviour of ground water would also have to be investigated.

In addition, the Scottish Water network of apparatus would have to be incorporated in any examination of surface water flood management. Implications for an integrated approach to co-ordination of working (impact on contracts). This would take several years provided Scottish Water has the resources.

This could take several years and be very costly. It would also take a minimum of one and possible maximum of two qualified Local Authority personnel to implement. There are also additional resource implications from the planning side of the Local Authority. How will this be funded?

- 8.05** Internal personnel training on the impact of the WFD and the duties of Responsible Authorities would have to be undertaken to most of the Roads and Planning Department of the Council, possibly a total of 50 staff members. Some more intensive training would be required for those who would have a more hands on remit. How will this be funded?
- 8.06** Who is going to undertake raising the awareness of the impact of the WFD on the wider community, for example developers, consultants etc?

SECTION 5: NEXT STEPS & ADDITIONAL INFORMATION

9.01 Timetable

The Scottish Executive anticipates that the order designating the Responsible Authorities will be laid in the Scottish Parliament in 2005.

9.02 River Basin Management Plans (RBMP)

In 2006, the Scottish Executive will start consultation on the development of RBMP and Responsible Authorities will be included in the consultation and expected to contribute. This is with a view to developing draft RBMP by 2008. At this point the Scottish Executive suggests an additional benefit of being designated will appear as Responsible Authorities will be able to prepare plans themselves in relation to a particular aspect of water management within a district.

EAC Response to Section 5

- 9.03** EAC is expected to contribute to the development of RBMP. Cost and personnel implications, how will this be funded?
- 9.04** In planning terms the timing of consultation on River Basin Management Plans in 2006 is important as it is likely that the Council's Consultative Draft Local Plan will be put out for public consultation during spring 2006. It would be useful if the Local Plan consultations and those on the River Basin Management Plans could be done in tandem so that they can closely inform one another.