

**National Marine Plan 2  
Strategic Environmental Assessment Scoping Report**

Overview

<i>General Comments</i>

Detailed Response

<b>Specific Comments</b>

<b>1</b>	<b>Do you have any comments on either the environmental topic areas or assessment methodology proposed? The proposed scope, including the relevant environmental topic areas, and assessment methodology are set out in Section 3 of SEA Scoping Report.</b>
Scottish Water welcomes the inclusion of all SEA environment topics within the scope of the assessment. We would highlight that all SEA Topics as set out in section 3 Table 1 should be considered as part of the SEA Objective used to assess NMP2.	
<b>2</b>	<b>What are your views on the broad policy framework and is there any further information that you feel should be considered? The broad policy framework included in this Scoping Report identifies the broader policy context and environmental protection objectives relevant to the plan that is being assessed (Policy Framework – section 2). This will be used to inform the assessment process.</b>
Scottish Water consider that the broad policy framework is comprehensive. We would suggest however that The National Litter and Flytipping Strategy Action Plan be considered for inclusion due to its contribution to the circular economy and its close alignment with the Marine Litter Strategy.	
<b>3</b>	<b>Is there any further information or data that you feel should be considered as part of the environmental evidence base for the assessment?</b>  <b>The proposed evidence included in this Scoping Report will be used to inform the assessment process (Environmental Baseline – section 2).</b>
Scottish Water notes that the approach taken to characterising the environment is based on a national scale.	

Our Improving Urban Waters Route Map sets out commitments relating to storm overflow Event Duration Monitoring (EDMs) and overflow spill data publication, this is available on our website, [Urban Waters Routemap - Scottish Water](#).

The historic data for reported overflows covering the period 2018-2022 is published on our [website](#).

This data is relevant to section 2.67, referring to Bathing Waters. In addition, the Water heading 2.69 - 2.71, including the effect of reducing the release of litter into the marine environment.

We note that in Material Assets section 2.86 – 2.96, no mention is made of the presence, function or operation of Scottish Waters shoreline or seabed assets. These include shoreline Wastewater Treatment Works (WTW), outfall and long sea outfall pipes that discharge treated wastewater under licence to the marine environment. In addition, we have seabed pipelines that form part of our public drink water supply network. All these assets and their operation are significant to the Scottish economy and health our customers.

<b>4</b>	<p><b>What are your views on the early work set out in the report to identify key environmental issues that will be used to inform the development of SEA Objectives for assessment (SEA Objectives - Section 3, Table 1)?</b></p> <p><b>Are there any additional environmental issues that should be considered in the assessment?</b></p>
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We consider that the Key Environmental Issues have been identified for each SEA Topic.

<b>5</b>	<p><b>What are your views on the SEA Objectives used to assess National Marine Plan (2015), (SEA Objectives – Section 3, Table 2)?</b></p> <p><b>These objectives will be revisited as part of the development of methodology for the SEA for NMP2.</b></p>
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The SEA Topic of Material assets should be addressed to ensure that the integrity of wastewater and water assets functionality and operations are protected from the activities of other incompatible sectors. This will contribute to the resilience of costal and island communities help avoid pollution and maintain status of coastal and marine environments.

We would suggest that this would also apply to other sectors that have assets sited with the Marine Environment.

<b>6</b>	<p><b>Do you have any further comments on the SEA scoping report?</b></p>
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We have no further comments currently