

8 March 2006

Water Division  
Scottish Executive  
Area 1-H  
Victoria Quay  
Edinburgh  
EH6 6QQ

Dear Sir / Madam

### **Diffuse Water Pollution from Rural Land Use**

The Royal Institution of Chartered Surveyors in Scotland (RICS Scotland) has noted the above consultation paper and is grateful for the opportunity to participate in this debate.

RICS Scotland is the principal body representing professionals employed in the land, property and construction sectors. The Institution represents some 9,000 members: 7,000 chartered surveyors, 200 technical members and 1,800 students and trainees. Our members practise in sixteen land, property and construction markets and are employed in private practice, in central and local government, in public agencies, in academic institutions, in business organisations and in non-governmental organisations. As part of its Royal Charter, the Institution has a commitment to provide advice to the government of the day and, in doing so, has an obligation to bear in mind the public interest as well as the interests of its members. RICS Scotland is therefore in a unique position to provide a balanced, apolitical perspective on issues of importance to the land, property and construction sectors.

Having considered this consultation document at length, the Royal Institution of Chartered Surveyors in Scotland wishes to make the following comments.

#### **General comments**

RICS Scotland welcomes the Scottish Executive's commitment to the management of water pollution and we feel that the approach is eminently sensible, combining "light touch" regulation and other measures designed to ensure eventual compliance in full with the water framework directive (WFD)

#### **Questions**

##### **Question 3: What aspects do you consider may require regulation or to be more rigorously controlled using existing powers of enforcement?**

RICS Scotland suggests that formal compliance with the PEPFAA Code be made a condition of all relevant LMC approvals.

**Question 4: Do you consider that advice on water pollution risks, within the PEPFAA Code and/or the Forest and Water Guidelines, is effective? If not, what else is required?**

RICS Scotland suggests that in the absence of factual, baseline information, it must be very hard for SEERAD or SEPA to measure improvement in water quality in relation to reduced diffuse pollution, on, say, a single farm.

**Question 5: Which measures to protect watercourses would you wish to see eligible for financial support under the planned Tier 3 of LMCs?**

RICS Scotland suggests that formal compliance with TIBRE might be an option. If only to ensure the actual crop nutritional requirements are met.

**Question 6: Do you agree with the idea of self-audit / environmental checklist of the farm's environmental practice?**

RICS Scotland agrees with the idea of self-audit / environmental checklists.

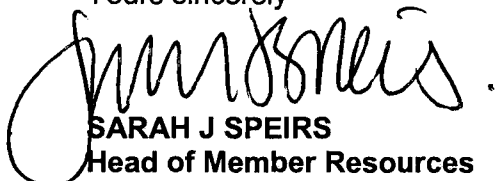
**Question 7: We think it is important to help farmers / foresters / land managers understand the likelihood of water pollution from their enterprise. What is most likely to be effective?**

Farm visits, with the advantage of one to one dialogue, would probably be most effective, but we question how achievable this would be for Scotland's large quantity of farms and crofts? Seminars and similar gatherings have the disadvantage of preaching to the converted and not reaching those who are disinterested.

On behalf of RICS Scotland, I hope that these comments are helpful. Should you wish to discuss the contents of this letter, please do not hesitate to contact me.

Kind regards

Yours sincerely

  
**SARAH J SPEIRS**  
Head of Member Resources  
[sspeirs@rics.org](mailto:sspeirs@rics.org)