

Response ID ANON-XRPM-81TV-T

Submitted to Water, wastewater and drainage policy consultation
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Water resource planning

1 Do you agree that Scotland needs to set out a plan to manage our water resources, for now and into the future?

Yes

2 To what extent do you agree that taking a national view of catchment risks will help better protect drinking water sources from pollutants?

Agree

Drinking water

3 To what extent do you agree or disagree that everyone in Scotland needs to use less drinking water?

Strongly agree

4 How do you think people and businesses could use less drinking water?

Please give us your views.:

Water metering.

5 Would you like to know how much water you use in your home?

Yes

6 Would you seek to reduce your water usage if this avoids building expensive new reservoirs and water treatment works?

Yes

7 Would you know where to find information on using less water?

Please give us your views.:

Yes – the Scottish Water website – <https://www.scottishwater.co.uk/Your-Home/Save-Water>

8 To what extent do you agree or disagree that the process for responding to water shortages should be changed so that appropriate action can be taken as soon as it is needed?

Agree

9 To what extent do you agree or disagree that all of Scotland's plumbing should be made lead-free?

Strongly agree

10 Would you know where to get information on how to ensure that your pipes are not affecting your drinking water?

No

11 Do you agree that all drinking water supplies, regardless of size or ownership, should be tested and inspected to ensure that drinking water is safe?

Agree

12 What support do owners and users of private water supplies require to ensure that drinking water is safe?

Please give us your views.:

No comment

13 Do you have any further views on public and private drinking water supplies?

Please give us your views.:

No comment

Drainage of rainwater

14 Who do you think has a role in changing how we manage rainwater in Scotland to adapt to the impacts of climate change? (Please select all that apply).

Individuals, Homeowners, Businesses, Scottish Government, Scottish Water, Local Authorities, Scottish Environment Protection Agency (SEPA), Land owners, Farmers, House builders, Community groups

Other:

Everyone has a role in helping Scotland adapt to a changing climate. Clearer guidance around responsibilities would be helpful, and the Scottish Government could be more bold and prescriptive, and reinforce messages about the development sector taking a more proactive approach. Long term maintenance should be a consideration. Landowners and farmers could be more proactive in NFM approaches, but may require greater incentives / compensation for any loss of income. Overall, business as usual is not sufficient and a step change is required. The consultation lacks any clear, bold, proposals to enact change.

15 To what extent do you agree that you/your organisation have/has a role in changing how we manage rainwater in communities to adapt to the impacts of climate change?

Strongly agree

16 What would you/your organisation be willing to do in your home/property to manage rainwater differently?

Please give us your views.:

The MGS DP is already a strong advocate for sustainable drainage, and the partners will continue to deliver and champion projects that manage rainwater sustainably through blue-green infrastructure and as a resource.

A joint approach of mandating change as well as incentivising people / organisations to make positive changes, should be taken. Financial incentives will only impact some people depending upon circumstances. If incentives don't provide the step change, then mandating should be considered. The Toronto downspout disconnection programme mandated people to make a change -

<https://www.toronto.ca/services-payments/water-environment/managing-rain-melted-snow/basement-flooding/mandatory-downspout-disconnection/>

The multiple benefits of blue-green infrastructure should also be communicated in any comms.

The link to water-butts saving costs if water supplies are metered should also be considered.

17 Would you know where to find information on how to best manage rainwater in your property?

Yes

18 To what extent do you agree that there is a need to plan, build, maintain and make room for drainage infrastructure to better manage rainwater in our villages, towns and cities?

Strongly agree

19 What should Scotland's drainage systems look like in the future?

A combination of both grey and blue-green infrastructure

20 Do you have any further views on how Scotland should manage rainwater in the future?

Please give us your views.:

As the consultation document states, a changing climate will bring more extreme weather events more frequently. In urban areas new development will be managed via SuDS and Scottish Water's surface water policy. Existing development presents the most significant challenge, and this is being exacerbated by urban creep.

For existing development, a combination of grey, green and blue infrastructure approaches will be required and should be combined with 'smart' technology to provide multiple benefits where possible - ie a rainwater harvesting system that allows reuse of capture rainfall, but can also be drained down prior to a storm event to ensure the full storage capacity is available.

Re-use of captured rainwater would also link well with the circular economy agenda and provide benefit through both reducing potable water consumption and reducing drainage discharges off-site. There would, however, be both a capital and maintenance cost associated with rainwater re-use that may increase the costs associated with delivery of new homes and, as such, developers are unlikely to embrace this approach unless it is mandated by national / local legislation, or if the costs of using potable water / discharging drainage made re-use economically favourable.

Communities, local authorities and elected members should carefully consider how the limited available space within existing urban areas is prioritised and used most effectively to tackle the twin challenges of net zero and adaptation through a balance approach to good spatial design- ie hard, impermeable surfaces for pedestrians, parking or travel, and permeable, blue-green infrastructure to manage rainwater and provide other benefits such as biodiversity, urban cooling, water quality, air pollution and noise reduction.

There would certainly be benefit in updating active travel guidance, such as Cycling By Design (published by Transport Scotland / Sustrans in 2021), to better reflect the need to formally consider and deliver water resilient places as part of once in a generation placemaking improvements, and reflect this in the design templates.

Attenuating water using permeable blue-green infrastructure may also help to combat drought conditions in some catchments.

With an increase in blue-green infrastructure there is a need to ensure maintenance budgets are allocated appropriately to ensure the multiple benefits

are realised and retained long term.

Identifying 'drainage' charges separately from water and wastewater charges should help to raise awareness of both the need to fund drainage interventions as well as the costs associated with adapting our drainage systems for a changing climate.

Whilst partnership working is key to long term success in terms of both delivering and maintaining drainage interventions, consideration should be given to whether the currently fragmented approach to managing drainage systems is appropriate – ie local authorities having responsibility for road drainage which usually connects to the sewer network that is the responsibility of Scottish Water. Consideration should be given to whether having one public body responsible for the whole drainage system would bring benefit.

A standard, agreed, process to determine the ownership of 'orphan' assets should also be defined to avoid situations where an asset cannot be effectively and efficiently utilised due to a lack of agreement as to who has the responsibility for the ownership and maintenance of the asset. This should prevent such assets from falling into disrepair and ensure any drainage function is fully realised such that it does not increase flood risk.

The Scottish Government should also require any carbon mitigation (net zero) action that it funds to also consider what climate adaptation action could be taken at the same time, to maximise opportunities that may already be getting missed, and reduce the risk that future adaptation action is made more difficult / expensive – ie if energy retrofit measures are being installed, can property flood resilience measures be installed at the same time.

To assist authorities in identifying opportunities, public bodies should have a duty to share information and access to assets.

Local authorities should have powers to install drainage infrastructure over 3rd party land similar to the powers that Scottish Water has.

A national programme for retrofit installation of property flood resilience interventions should be considered, to ensure a consistent approach across the country.

Amendments to the Roads Scotland Act should be made to roads to be formally used for flood storage and conveyance, particularly if this is a better use of public funding than constructing new assets. Roads already take on an informal drainage function during storms, and the legislation should recognise this.

Whilst the MGSDP advocates the delivery of blue-green infrastructure as a key component of urban drainage systems that contribute to placemaking and increase local storage and treatment capacity, there is also a need to increase overall drainage network strategic conveyance capacity, which will include the formation of new surface water conduits where historic watercourses have been lost. However, it is recognised that this presents a significant funding challenge alongside the need to maintain existing Victorian era drainage networks (sewers, culverts and drains).

Overall, the process, responsibilities and investment for adaptation need to reflect the urgency of the climate emergency, and ensure that relevant bodies have the correct powers and duties to deliver adaptation without delays or obstruction.

Wastewater collection and treatment

21 Should investment be prioritised to address overflows that have a negative impact in the environment?

Yes

22 To what extent do you agree or disagree that more should be done to stop items being disposed of down toilets or drains?

Strongly agree

23 How do you think we can change behaviours to avoid the disposal of substances or matter in the toilet/sewer?

Please give us your views:

A media / comms campaign, with a schools focussed element, may provide some benefit. Making it an offence for domestic properties to dispose of inappropriate items in the toilet / sewer may not be practicable, though would give a means of enforcement, perhaps as a fixed penalty notice similar to a parking fine, where the source can be identified.

24 It is already an offence for non-household properties to discharge fats, oils and greases to the sewer. Do you agree that offences should be extended to:

q24 - include other pollutants, and specifically plastic?:

Yes

q24 - extend the offence to household premises?:

No

Please give us your views:

Making it an offence for domestic properties to dispose of inappropriate items in the toilet / sewer may not be practicable, though would give a means of enforcement where the source can be identified.

Amending product regulations / standards, such as requiring washing machines to filter for plastic fibres, should be considered.

A media / comms campaign to raise awareness, including of any offences / penalties, may provide some benefit.

25 We currently undertake some monitoring of pollutants, do you agree that we should extend our monitoring of wastewater to look for new pollutants, and monitor pathogens in the community?

Agree

26 Do you agree that resource recovery is something that Scottish Water should be undertaking?

Yes

27 To what extent do you agree that Scottish Water should be able to use the money it receives from customer charges to invest in resource recovery hubs?

Agree

28 Do you agree that all wastewater treatment systems, regardless of size or ownership, should be tested and inspected to ensure that they do not impact negatively on the environment?

Yes

29 What support do owners and users of private wastewater systems require to best protect the environment?

Please give us your views.:

Some guidance is already available on the SEPA website -

<https://www.sepa.org.uk/regulations/water/septic-tanks-and-private-sewage-treatment-systems/>

Further education and comms to help ensure users have the necessary skills and capability to operate a private system, and understand the consequences of failure, would be beneficial.

30 Do you think that owners of existing private wastewater systems should be required to connect to the public system where connection is possible, beneficial and not expensive?

Neither agree nor disagree

31 Do you have any further views on public and private wastewater systems?

Please give us your views.:

Increased monitoring of all types of overflow and discharge (sewer, roads drainage, agriculture, etc) is required in order to have a comprehensive dataset on performance to identify where investment should be prioritised based on environmental benefit.

Monitoring of overflows should also consider a wider range of parameters, such as micro-plastics, pesticides, chemicals and tyre rubber additives such as 6PPD-quinone that may be harmful to aquatic life.

Requiring private wastewater systems to connect to the public system would have to be carefully considered, with a clear mechanism to consider the environmental, carbon and cost implications.

Paying for services

32 To what extent do you agree that changing our behaviours is essential to limit charge rises?

Strongly agree

33 Do you agree that we should recognise that there are three services (water, wastewater and drainage)?

Yes

34 Do you agree that using Council Tax Bands is the fairest way to charge for services used by households?

No

Please give us your views.:

No. The fairest way would be based on actual usage, as long as the impact on low income and vulnerable groups is considered. A charging system that encourages appropriate behaviour would be beneficial.

35 In your view, how do we incentivise households/businesses to reduce water usage to levels that are sustainable for Scotland?

Please give us your views.:

As gas and electricity supplies are billed based on the metered volume used / consumed, the metering of water supplies would allow a direct link between the usage and cost, and provide a clear mechanism for users to decide whether to reduce their water consumption or not.

Requiring a new development or redevelopment to reuse a % of capture rainwater would also reduce water usage and drainage discharged / flooding.

36 In your view, how could we incentivise households/businesses to manage rainwater differently to reduce rainwater entering the sewer system to levels that is sustainable for Scotland?

Please give us your views.:

The current system of charging businesses based on their rateable value means there is no link to the size of the discharge.

Billing for drainage based on the discharge that a domestic or non-domestic property makes would allow a direct link between discharge and cost, and provide a clear mechanism for users to decide whether to reduce their drainage discharge or not. This could be done via an impermeable area measurement and charging approach.

Alternatively, offering users a financial incentive (discount) to attenuate or reduce their drainage discharge may also help, though it would likely have to be sufficient to offset the cost of any interventions that the user had to implement, though some users may implement these measures as part of their social responsibility commitments.

The current system of removing the 'drainage' element charge only if all discharge to the public sewer network is disconnected is not effective as full disconnection is rarely possible to achieve, particularly in urban areas where surface water flood risk is highest.

Requiring a new development or redevelopment to reuse a % of capture rainwater would also reduce water usage and drainage discharged / flooding. Greater transparency to help consumers understand where the money collect is then spent would be helpful. Ring-fencing of funding may help to ensure that drainage charges for roads are spent on maintaining road drainage infrastructure, should be considered.

37 To what extent do you agree that all households and businesses should pay for roads to be drained?

Agree

About you

2 What is your name?

Name:

Withheld

3 Are you responding as an individual or an organisation?

Individual

4 What is your organisation?

Organisation:

5 Further information about your organisation's response

Please add any additional context:

6 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

7 Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

No

8 What is your email address?

Email:

9 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

10 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly dissatisfied

Please enter comments here.:

Generally poorly written consultation document.

No comments on how to improve leakage.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.: