

Response ID ANON-XRPM-81SJ-D

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?

Disagree

Drinking water

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

Agree

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

Please give us your views.:

This question is not presented in the correct manner. It would be more appropriate to ask how people and businesses could use less drinking water for purposes other than drinking.

Scotland is a country, as this consultation document points out, that enjoys a reputation for being water rich. Individuals on mains water supply very rarely think of how they may be impacted by water scarcity, i.e. not just a decrease in water levels but an erosion of the quality of that water. It is likely that most people have not had the opportunity to consider the benefits of moderating their water consumption or meeting their non-drinking water needs in different ways. Most businesses are metered and therefore have a different level of awareness. Tailored communication is therefore an important first step. People and communities in rural and island communities, especially those on private water supplies will require specific communication.

Infrastructure is also necessary, whether that is infrastructure that works at household level, rural community level, urban neighbourhood level or whole-city level. Such infrastructure, from small waterbutts to large scale drainage and reservoir systems need to be geared towards retaining and managing the water we have available to us.

It is of grave concern that this consultation document appears dismissive of infrastructure options, citing costs and carbon emissions, while proposing that behaviour change is an "alternative." It is not an alternative. Both measures are necessary and interdependent.

What is also of grave concern is the leading nature of these questions progressing from "how do you think people and businesses could use less drinking water?" to "would you like to know how much water you use in your home?" This is a different way of asking people if they would like to be metered without using the term "meter."

In our consultation with rural and island communities, no-one has requested a meter to address water scarcity. Amongst the measures they have requested include:

1. Improved data on households and businesses that rely on private water supplies - this data should then be used to support households come together to work with Scottish Water and others on solutions to water scarcity affected PwS. A good example of a community-level response is Papa Westray.
2. Improved education and awareness raising for wider community around our collective "right to water" and how this is met, including ensuring local communities/neighbourhoods know where their water is actually coming from and what is involved in producing it, i.e. the carbon cost of producing it, plus how to address water scarcity. Initiatives like the Carbon Neutral Islands programme are beginning to explore these questions in an islands context.
3. Improved infrastructure as above including that known leaks in Scottish Water pipelines, of which there are many, are fixed. Some of these leaks can cause danger to pedestrians and cars, for example when they freeze over.
4. Planning regulations for housing and business units can support improved retention and use of non drinking water, alleviating pressures on the mains drinking water system.

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

No

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

No

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

Please give us your views.:

Information is limited and generic. As part of the communications approach mentioned in section 4, there needs to be a community water support interface, like Home Energy Scotland or Local Energy Scotland, that can support households, businesses and communities through a water transition.

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?

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.:

In consultation with communities, the following points have been highlighted:

1. There are many different options for private water supplies, from boreholes to rainwater collection and using local streams or lochs. Each option is context specific, and requires a level of knowledge, specialist support and maintenance to ensure appropriate functionality and testing.
2. Private water supply systems fall into various categories of ownership. They may belong to and serve a single household/business, they may belong to and serve multiple different households or a community. The water body or the land used to connect a water body to the customer might not belong to the customer but have been in place for a hundred years, creating complexity in legal relationships.
3. Private water supply systems have specific implications for property sales, planning etc. and the need to install a private water supply system, if newbuilds have no mains connection options, can add significant time and costs to projects.
4. Private water supply systems are increasingly affected by the changing climate but new technologies are becoming available which could help in certain circumstances.
5. Because Scotland is seen as a water-rich country the WATSAN sector here, which is replete with talent, is only recently shifting focus from international efforts to domestic issues. Progress in this respect will require investment and a level of support for customers and communities to connect with WATSAN expertise.

Because of the complexity of this landscape, a tailored and coordinated platform of communication and support, similar to Local Energy Scotland, will enable owners and users of private water supplies to access what they need, including grants. The present private water supply grant should be increased to encourage users of failing supplies to seek long-term solutions such as borehole drilling, ideally on a neighbourhood or community level where possible that would reduce overall costs per household. This latter neighbourhood or community level action can be accelerated with the help of Local Development Officers. There should also be targeted investment in transitioning rural and island households most at risk of failure to mains supplies.

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

Please give us your views.:

Question 2 (To what extent do you agree that taking a national view of catchment risks will help better protect drinking water sources from pollutants?) is meaningless. What precisely does "a national view" mean? Does it mean that all of the 3641 Scottish Water CSOs will be independently monitored? Does it mean that a new centralised regime of water level and water quality testing, and of national reporting will be introduced, covering catchments that serve Scottish Water customers, as well as customers on private water supplies?

Our option was to respond by selecting from a scale between strongly disagree and strongly agree. There was no opportunity to qualify our answer. It is important that whatever "a national view" might look like, it supports decentralised catchment-level views of catchment-level risks, given the tailored place-based response which would be required to manage many of the current and future risks identified.

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).

Other:

Everyone has a role but who, ultimately, has responsibility and to what extent? Lack of clarity around responsibilities, and lack of leadership, must be addressed before stakeholders can play a role.

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?

Agree

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

Please give us your views.:

Our organisations (Scottish Rural Action and Newcastle University) enable rural and island communities to share expertise and experiences on topics of interest including on water, wastewater and drainage.

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

No

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?

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.:

The changes in rainfall patterns occurring across Scotland due to a changing climate are providing the opportunity for wide scale changes to be made with how rainwater is viewed. Instead of continuing with the existing paradigm centred on the disposal of rainwater via underground pipes and existing water courses in the fastest possible way, a move to increased storage of water in the landscape with potential for reuse is required if Scotland is to deal with the ever increasing number of water shortages and more intense periods of rainfall.

Through the use of blue- green infrastructure such as water butts, permeable paving, wetlands, and rain gardens, anyone in both urban and rural areas, with even the smallest amount of land (e.g. a drive way) can help with water retention and storage.

In some cases however, it needs recognised that blue-green infrastructure will not be possible, in which case grey infrastructure is still necessary.

The cost, in particular, the capital cost of necessary works must be considered and planned for by the Scottish Government as well as the need to review and strengthen the regulatory/legislative framework around surface water flood risk management with emphasis on clarifying duties and responsibilities to take action.

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:

While education and awareness can go some way to change behaviour (excellent examples are the campaigning activities of Tighnabruaich primary school and organisations like Surfers Against Sewage) there is need to address the more persistent root causes of problems.

Scotland became the first country in the UK to ban plastic-stemmed cotton buds, and we support a ban on plastic wet wipes. Wet wipes are the most common cause of blockages in sewers which can lead to pollution events. As well as this, wet wipes can break down in sewer systems to microplastics.

We also support working with the NHS and others to test new ways of removing traces of pharmaceuticals from wastewater.

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?:

Yes

Please give us your views:

This kind of offence, as has been stated in the consultation document above, is very difficult to enforce and therefore begs the question of whether it is worth legislating for.

This questions should not have been YES/NO but had a "NOT SURE" option.

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.:

It is important that the Scottish Government gets a more accurate understanding of private wastewater systems. We only have estimates on the number of domestic septic tanks in Scotland and these estimates range from 180,000 to 468,000. The number of properties with direct discharge (no treatment of wastewater) across Scotland is completely unknown but will amount to thousands. Septic tanks and direct discharge are mainly in rural and island communities and this needs a very specific policy response from government.

In consultation with communities, the following points have been highlighted:

1. If connection to the mains sewer network is not possible, owners and users are instructed that the only available option is a septic tank. However this is untrue, and at times a septic tank is the least suited form of technology in a specific context. Septic tanks only work if you manage them (sludge is emptied every 3-5 years), however many users are completely unaware of management requirements. Or in many cases systems are installed with the knowledge that maintenance will never be an option due to a lack of access to the site.
2. Due to the lack of regulation, competition, price control and funding opportunities and support, some rural and island communities are repeatedly charged 3-5 times the market price for installation of private wastewater systems. Individuals and communities are simply being priced out of environmental protection measures.
3. The failure to consider the interrelated management of both private water and wastewater systems in some environments is resulting in contamination of drinking water supplies and the wider environment.
4. The current economic charge for registration of septic tanks without any benefits received from this service, has created a barrier to registration for many. This has greatly contributed to the current system in which there is an unknown and unmanaged number of systems located across Scotland.
5. The number of direct discharges in Scotland remains an unknown at a national level, but impacts are felt acutely at the local level. Efforts to address any issues relating to existing private wastewater systems must also extend to cover this issue.
6. Rural and Island communities are aware of the potential benefits of the use of co-digestion of waste at the community level, however a lack of funding or knowledge availability continues to provide a barrier to this. Digestion of waste in the communities it has been produced in along with reuse of resources would greatly contribute to sustainable communities.

Due to the complexity of the wastewater treatment landscape in Scotland, a strategic review of needs is required. As with water supplies, a tailored and coordinated platform of communication and support, similar to Local Energy Scotland will help to enable owners and users of private systems to access

what they need including grants. A grant for wastewater systems, in line with a revised PWS grant should be introduced to encourage users to improve existing treatment systems or initial installation in the case of direct discharge. This would again ideally take place on a neighbourhood or community scale.

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?

Disagree

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

Please give us your views.:

Question 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?- The use of resource recovery is desperately needed across Scotland, however the issue is how this is done. If this question is suggesting one or two national hubs located in the central belt which all waste will be transported to via ferry and road then the answer is no. However if the resource recovery took place at the neighbourhood/community level including highland and island spaces where recovered resources could be used at the same scale then the answer is yes.

Regarding Question 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? Again this question fails to outline how this would be implemented, or how 'negatively impacts the environment' would be defined. Most importantly, it does not outline what the repercussions would be for owners and users would be if a system failed the test. This question should not be answered until an appropriate system of advice and support has been outlined.

With regards to Question 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? - This question fails to define the terms of a 'requirement' and how possible, beneficial and expensive would be defined. It again fails to provide option for a qualitative response. Additionally, connection to centralised mains treatment is not always the answer. Efficient and effective treatment at the local decentralised scale can be the preferred option for owners, users, and the environment. This is in terms of operational and capital costs, effluent quality and green house gas emissions. Anecdotes collected from rural and island communities, show that in some areas, the public system performs to a lower standard than many private systems. In cases such as these, until improvements are made to the public system, it would be completely redundant to 'require' connection from anyone.

Paying for services

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

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.:

Council Tax Bands are not the way to charge for services.

Straightforward metering can unfairly disadvantage particular households when there are, for example, hidden standing charges as with energy pricing, which disadvantage households in rural areas or households who do not use "dual fuel" i.e. both electricity and gas. You can see this kind of system bias playing out in a near future water sector where households may have "dual water" systems - drinking and non drinking water.

The fairest way to set charges for services is to understand the constraints and expectations of consumers and work with organisations such as Citizens Advice and Consumer Scotland to develop an approach to setting out a transparent consultation specifically on a new pricing scheme.

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.:

The best way to achieve this is at the hyperlocal - community or neighbourhood - level where people and businesses feel collective ownership of the issues and the solutions.

Incentivising therefore, in a financial way, translates to schemes that communities and neighbourhoods can tap into for both capital and revenue funding alongside relevant information and advice. These schemes may tie into climate and carbon emissions targets and be delivered through Climate Hubs, the proposed water-focused Local Energy Scotland model, Community Led Local Development structures etc.

It is, however, critical to return to the point that incentivising requires first clarity of legal/regulatory responsibility and leadership on the issues.

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.:

As above

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

Strongly disagree

About you

2 What is your name?

Name:

Artemis Pana, Dr Elizabeth Lawson and Dr Jaime Amezaga

3 Are you responding as an individual or an organisation?

Organisation

4 What is your organisation?

Organisation:

Scottish Rural Action and Newcastle University Centre for Water on behalf of the Scottish Rural & Islands Parliament

5 Further information about your organisation's response

Please add any additional context:

This response has been informed by a long term engagement programme with rural and island communities, centred around the 2023 Scottish Rural & Islands Parliament. The engagement programme has been curated by Newcastle University and supported by Scottish Rural Action.

During this process, we have collected stories from rural and island communities on both issues and solutions relating to water supplies, wastewater treatment, addressing water scarcity and flooding events and raising awareness of our human right to water.

We hope this consultation paper by the Scottish Government is only a step in how community voices can be heard in this debate.

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?

Yes

8 What is your email address?

Email:

artemis@sra.scot

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?:

Very dissatisfied

Please enter comments here.:

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.: