

LINK Consultation Response

Water, wastewater and drainage policy consultation

16/02/2024



Scottish
Environment
LINK

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Introduction to Scottish Environment LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK's Freshwater Group.

1. Response

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?

Strongly 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.:

See question 13 below.

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.:

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?

Strongly 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?

Strongly 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.:

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

Please give us your views.:

The climate in Scotland is changing. Winters are becoming milder and wetter, while summers are hotter and drier. These climatic changes affect our water usage.

We typically see increased water use in summer due to garden watering, car washing, filling paddling pools, etc. Last year, domestic demand for water rose by 20% during the summer. This additional demand places a greater burden on water supplies which in turn leads to increased drawdown from reservoirs and abstraction from groundwater aquifers. Water is treated to a high standard for potable supply, using chemical and mechanical processes. Despite the energy and resources that are put into treating drinking water, around a third of water treated is lost through leakage from the water main system. It is imperative that leakage from the water main system is reduced. This will require significant investment in upgrading the water supply system.

Scotland has the highest per capita water usage in the UK, and one of the highest in Europe. As a water-rich country, many consumers consider drinking water as a limitless resource. Reducing our water consumption should be a priority for all sectors. Around a third of water supplied to households is used to flush toilets. Not only is this a waste of resources, it places an unnecessary burden on the supply system. Despite first being identified as a potentially useful approach to reducing water usage some 20 years ago, grey water recycling has not been widely adopted in the UK. To accelerate the adoption of this technology a grant scheme should be developed to encourage and enable householders to retro-fit grey water systems. In addition, the installation of grey water systems should be encouraged through the planning system. Taking the actions described above would make a significant contribution to Scotland's Circular Economy ambitions.

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 managing rainwater from their properties.



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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?

Not Answered

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

Please give us your views.:

We welcome the focus on blue-green infrastructure and the inclusion of a diverse range of rainwater solutions. We would like to see planning policy introduce a presumption for green roofs on all new business premises and public sector buildings. Increasing the permeability of our urban areas is essential. In addition to replacing paved areas with permeable surfaces, the sale of artificial grass to domestic customers should be limited to prevent the conversion of grassed surfaces to artificial grass. It is important to highlight the role and responsibility of planners and developers in managing rainwater in the face of the climate crisis. Policy 22 of NPF4 (Flood risk and water management) requires planners and developers to base their decisions on sound guidance on water management, design and plan with conservation and flood management in mind, and adhere to evidence and advice from relevant bodies such as Scottish Water and SEPA. Policy 2c) of NPF4, supports retrofit measures to adapt to the effects of climate change. This should include upgraded gutters and downpipes to protect the integrity of buildings in the face of higher, more intense rainfall, and the installation of grey-water reuse systems.

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?

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.:

Nature based solutions bring additional benefits beyond improving drainage, it allows for a long-term strategy of climate resilience and should therefore be looked on as the first-choice option. However, we recognise that grey infrastructure may be required in certain instances but would call for all new developments to be obligated to use nature-based solutions and blue/green infrastructure with commitments to ongoing maintenance. For any infrastructure to be truly successful, it is important to ensure that mechanisms are already in place to remove persistent chemicals and microplastics which do not break down naturally. Collected rainwater will also contain contaminants and pollutants and therefore any kind of infrastructure must be maintained on a continuous basis to prevent negative environmental impact and to prevent accumulation.

It is essential that blue-green infrastructure is not merely an engineering solution but also benefits biodiversity. Currently most SUDS ponds are managed for nature by exception. Vegetation around the pond is cut regularly, with the only exceptions being around nesting swans, etc. Instead, naturalisation should be encouraged around the whole pond, with the only exceptions being where engineering structures are present or access is regularly required.



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Similarly, we must avoid the urge to over-engineer these solutions. It is important that we work with nature, and not simply construct large holding areas for water with little other benefit. Retrofitting SUDS in older built-up areas can be problematic and will have cost, but the Commonwealth Games village (now housing) in Eastern Glasgow shows that it can be successfully done. The presence of a nature-rich SUDS in an area will enhance both its recreational and environmental value and hence also the monetary value of a wider local area.

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:

We would always advocate that stopping pollution at source is the priority; intervention should be as early as possible. A shift to reusable products would reduce the number of flushed items, but additional steps can be taken to reduce the amount entering the wastewater network, alongside Scottish Water putting in place measures to stop pollution escaping from the network. Measures to stop generating waste and preventing it from entering the wastewater network have been shown to be cost effective and to significantly reduce the quantity of SRD. Measures include:

Supporting consumers to move to reusable products.

Highlight positive cost preferential over lifetime of products - education around periods, babies, children, new families should include positive promotion and information on reusable options. Where appropriate Scottish Government sponsored schemes would look to support reusable items as the preference.

Businesses and organisations should be part of education campaigns too, particularly those who manage a lot of these products daily.

There needs to be an assessment of the effectiveness of previous communications campaigns to help create long term language and behaviour change to follow the success of other behaviour change such as using a seatbelt and smoking inside. It will be a long-term message conversation so investment into research to understand what resonates to influence change will be needed.

An education campaign will also need to consider the demographics and the context of users of these products. For example, users of wet wipes for babies and users of incontinence pads in older age groups.

Banning all avoidable single-use plastic in wet wipes and other sanitary items, such as tampon applicators, where alternatives exist.

Applying Extended Producer Responsibility (EPR) to all sanitary products (not just those that contain plastic) to cover clean-up costs.

Improved labelling and consumer awareness to promote correct disposal. As a minimum this should include requirements from the EU Single Use Plastics Directive (e.g. a requirement for products to display 'Plastic in Product' and 'Do not flush' labels.

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?:



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Yes

q24 - extend the offence to household premises?:

Yes

Please give us your views:

Education should be a primary undertaking here but where repeat offenders are able to be identified and proven to purposefully be disregarding the offence then further action should be taken. However we recognised that this would be difficult to police. Further detail is required on how offenders would be identified.

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?

Strongly 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?

Not Answered

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.:

Clear guidance is needed as well as an easy way to test. Scottish Government could potentially facilitate testing through approved suppliers. For businesses on a private wastewater system, requirements should be put into business regulations to prevent negative impact on the environment from accumulated or higher levels of mismanagement.

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?

Agree

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

Please give us your views.:

It would be beneficial to link up more private systems on the public system to ensure it meets specifications and would have more oversight on compliance.

Planning for housing developments should be refused that do not connect to the public system if this does not already exist.

Owners who want to connect to the public system should be positively supported where feasible through subsidies or reduced costs.

Paying for services

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



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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.:

We do not believe this would incentivise behaviour change. The most effective way to incentivise water saving is by charging based on water usage. If water meters are fully installed, then this would be the fairest way to charge on the basis of water usage. The introduction of Smart water meters would allow real-time monitoring of water usage by consumers which in turn would allow them to make informed decisions on their water usage. However, we understand that it would take time to fit water meters on all water supplies. The current scheme of using Council Tax Bands is simple, however is not particularly progressive. A thorough review of potential mechanisms is required to ensure that water charging is fair, progressive, and incentivises water users to reduce their consumption.

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.:

Measures could include:

1. Water meter bills or providing opportunities and advice for reducing water usage through a smart meter type system similar to current gas and electric smart meters and apps.
2. A progressive water charging scheme that rewarded water savings and penalised water wastage.
3. A requirement on landlords to provide low water use information and white goods for rented accommodation.
4. Better information available for purchasers of water-using items such as toilets, showers, washing machines, etc., to allow comparison between products. A water usage/saving rating could help.
5. All new developments should have water meters installed as standard.
6. A water scorecard for properties, similar to the energy ratings produced for houses.

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.:

An incentive could come in the form of a reduction in part of your bill if you have a nature-based solution, e.g. a green roof, rainwater storage, etc. An approved list of effective nature-based solution would be required.

Re Q37 below, as there is no separate taxation system for roads drainage, we surely all already pay for roads to be drained via a mixture of low-visibility, indirect schemes dependent upon the road type and location?

Road run-off is always contaminated to some extent, but (rural, trunk) roadside soak-away schemes appear to generally do an acceptably good job, though they will accumulate more persistent pollutants. In urban areas, the road run-off must be directed to the same SUDS as any rainwater from surrounding buildings.

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

Neither agree nor disagree

About you



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2 What is your name?

Name:

Craig Macadam

3 Are you responding as an individual or an organisation?

Organisation

4 What is your organisation?

Organisation:

Scottish Environment Link (Freshwater Group)

5 Further information about your organisation's response

Please add any additional context:

This response is supported by the following organisations:

Badenoch & Strathspey Conservation Group

Buglife Scotland

Cairngorms Campaign

ERCS

Froglife

Marine Conservation Society

Scottish Wild Land Group

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

Publish response only (without 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:

information@scotlink.org

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 satisfied

Please enter comments here.:

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

Very satisfied



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Please enter comments here.:

This response was compiled on behalf of LINK Freshwater Group and is supported by:
Badenoch & Strathspey Conservation Group
Buglife Scotland
Cairngorms Campaign
ERCS
Froglife
Marine Conservation Society
Scottish Wild Land Group
Scottish Wildlife Trust

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