

## Housing 2040

### Overview

<i>General Comments</i>
<p>Scottish Water will continue to work directly with the wider development community, including Local Authorities, SEPA and housebuilders to influence the location of housing allocations to areas where Scottish Water has both network and treatment capacity with minimal need for interventions. Scottish Water is in the process of developing a Site Readiness Indicator to assess proposed and allocated domestic housing land sites across Scotland against Scottish Water's ability to service these sites for water provision, drainage and surface water discharge points.</p>

### Detailed Response

<b>Specific Comments</b>

1	<p>Earlier this year we published our draft vision and principles. A short and longer version are available here: <a href="https://www.gov.scot/publications/housing-to-2040/">https://www.gov.scot/publications/housing-to-2040/</a>. Do you have any comments on the draft vision and principles? <i>Please be specific and identify what you would change and why.</i></p>
	<p>Scottish Water would promote the inclusion of ensuring housing allocation decisions take cognisance of surface water policy in relation to Flood Risk and Planning requirements. Scottish Water remain committed to enabling a sustainable and flourishing Scotland that demonstrates the need for surface water solutions utilising green space allowing for climate change and also our aspirations to achieve net zero carbon emissions.</p> <p>Principle 9 should also reference water efficiency since this is very closely linked to energy efficiency with on average a fifth of household energy bills being spent on heating water. Improving the water efficiency of homes helps reduce energy bills for residents, helps lower the water industry's carbon footprint by reducing the demand for water, and helps protect our water resources during prolonged dry spells which can result in water shortages. In this way water efficiency supports the eradication of fuel poverty as well as supporting mitigation of and adaptation to, climate change.</p>
2	<p>Do you have any comments on the scenarios and resilience of the route map or constraints? <i>These are set out in sections 3 and 4 of Annex C.</i></p>
	<p><i>For questions 3 to 7 below, when making proposals, please be as specific as you can about:</i></p> <ul style="list-style-type: none"> <li>• Who needs to make it happen and what type of action is required? Eg facilitation, regulatory, financial, infrastructure, training etc.</li> <li>• How much it costs and who will pay?</li> </ul>

- Who is needed to do the work (workforce)?
- How long the proposal would take to implement and whether it is a temporary or permanent measure?
- When in the period 2021 to 2040 should it begin and does anything need to be done first?
- Who will benefit (who is it for)? And who might lose out and how could this be mitigated? (Think about equality groups and different types of organisation and geography and the impact on the wider community.)
- How does it help deliver the draft vision? Does it align with the draft principles?

We recognise you may not be able to answer all of these questions – please do not let that put you off responding to us with your proposals.

3	Do you have any proposals that would increase the <b>affordability</b> of housing in the future?
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We would encourage housing development where we already have capacity within the water and waste water network and Scottish Water’s Development Planning team will continue to liaise with Local Authorities during Local Development Plan creation to identify potential and favoured areas for development. In addition Scottish Water will be launching the online Readiness Indicator in 2020 to enable site assessments to take place by Developers and/or Local Authorities.

The risk to Scottish Water’s existing asset base, particularly around the proximity to existing assets, is currently not fully considered as part of the planning consultation process and can lead to high development costs when identified later in the process. Scottish Water, therefore, would welcome being involved at an earlier stage in the planning process and would actively encourage approaches from Government, Planners, Developers and Householders to discuss the significance of this issue.

4	Do you have any proposals that would increase the <b>accessibility and/or functionality</b> of existing and new housing (for example, for older and disabled people)?
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Not applicable

5	Do you have any proposals that would help us respond to the global climate emergency by <b>increasing the energy efficiency and warmth and lowering the carbon emissions</b> of existing and new housing?
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Scottish Water and its wholly owned subsidiary Scottish Water Horizons have been implementing a programme of offsetting power use through the development of renewables on our operational assets. We have also recently commissioned the Stirling low carbon district heating scheme utilising heat from waste water technology, in collaboration with Stirling Council. We have a number of other low carbon district heating projects at various stages of development. Scottish Water Horizons are also currently investigating use of energy storage systems to accompany renewables technologies allowing a better distribution of energy to meet site demand.

Tighter and enforced building standards in regards to water efficiency and support for the improvement of water efficiency in existing housing stock. E.g. by ensuring that taps/showers/toilets are water efficient. This will involve a multi-stakeholder approach involving changes in government legislation, regulation and lined up messaging across stakeholders.

Improving building standards in this way will support residents with reducing their energy bills, it will support Scottish Water and therefore Scotland with its net zero carbon goals, and it will support wider communities by improving the resilience of their water supplies both for householders and for business in their communities. It will also support sustainable tourism, particularly in rural communities where tourism significantly increases their population during

the summer (often the driest months) and can put further pressure on water supplies.

By improving water efficiency in homes we can ensure there is more water available to both improve resilience to water shortages as well as supporting growth and development in these areas. This will become increasingly important as rainfall patterns become less predictable in the future in the face of climate change.

6	Do you have any proposals that would improve the <b>quality, standards and state of repair</b> of existing and new housing?
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The use of water efficiency measures in housing would help reduce the impact on the environment and help with the climate change challenge.

7	Do you have any proposals that would improve the <b>space around our homes</b> and promote connected places and vibrant communities?
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The maintaining and creation of green spaces helps reduce flooding and the impact it has on homes along with the impact on mental health.

We have concern that the historic loss of green space in the urban environment to hard surfaces ('urban creep' such as paving over gardens for driveways) has had significant increase in the risk of surface water run-off and flood risk in urban areas. The Scottish Government Programme for Government has highlighted the concern that the historic loss of green space in the urban environment to hard surfaces ('urban creep' such as paving over gardens for driveways) has had significant increase in the risk of surface water run-off and flood risk in urban areas.

8	Any other comments?
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The impact of flooding in terms of economic damage to properties, businesses and infrastructure along with in terms of mental health should be considered.

Both Local Authorities and Scottish Water are investing substantial sums of public money in surface water management to try to reduce flood risk, and the effectiveness of this work is already reduced through urban creep, but could potentially be undone with poorly planned development eroding green spaces within the existing environment. Maximisation of opportunities to utilise blue / green infrastructure should be promoted.

Scottish National Flood Risk Assessment was updated in 2018, resulting in a step change in understanding of the flood risk in Scotland with the primary risk of flooding – with 74% of these at risk from surface water flooding. This will be amplified by climate change with flooding identified as the greatest climate change risk.

We would like to see good quality housing that can adapt to a changing climate which will enhance our natural environment.

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