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The Scottish Government Planning and
Architecture Division
Area 2-F (South)
Victoria Quay
Edinburgh
EH6 6QQ

Castle House
6 Castle Drive
Carnegie Campus
Dunfermline
KY11 8GG

Customer Helpline
T: 0800 0 778 778
W: www.scottishwater.co.uk
E: Regulation@ScottishWater.co.uk

Dear Sir/Madam,

National Planning Framework 4 – Call for Ideas

Scottish Water welcomes the opportunity to contribute to the NPF4 call for ideas and is supportive of the desire to take a longer term view to 2050 in identifying where development and infrastructure are required to enable sustainable and inclusive economic growth across Scotland.

Please find Scottish Water's response in the attached appendix. In this we have highlighted where NPF4 could support us to achieve our commitments, as outlined in our recently published 25 Year Strategic Plan.

We would welcome the opportunity to engage at each stage of the development of NPF4.

Please send any enquiries or further information to the email address above.

Yours faithfully,

Simon Parsons
Director
Strategic Customer Service Planning

ENCS – Appendix 1

Appendix 1

Scottish Water's Response to the Call for Ideas National Planning Framework 4

Scottish Water has a crucial purpose – at the heart of our country – to support a flourishing Scotland through being trusted to care for the water on which Scotland depends. We seek to transform our activities to reach net zero emissions five years ahead of national 2045 targets – and go beyond.

Our recently published 25-year strategic plan “A sustainable future together” focuses on how we will achieve three strategic outcomes that are aligned with our role in achieving Scotland’s ambitious Water Sector Vision: Service excellence, beyond net zero emissions and great value and financial sustainability.

The Strategic Plan can be found here: <https://www.scottishwater.co.uk/help-and-resources/document-hub/key-publications/strategic-plan>

In our responses to the questions below, we have highlighted areas where the NPF4 can support us to achieve our commitments while meeting its own overall objective of supporting sustainable and inclusive growth.

Question 1: What development will we need to address climate change?

Every day we connect new houses and businesses to our water and waste water networks across Scotland. This activity, both in housing and industry, is a vital component in ensuring Scotland has a prosperous and inclusive economy. We expect significant growth in the number of properties to be served, particularly in the east of Scotland, due to forecast population growth and a continuing reduction in average household occupancy, although the precise impact of this on our activities is uncertain. How development is enabled has a key part to play in achieving national 2045 net zero emission commitments and can, in turn, support us in achieving our beyond net zero emissions strategic outcome. NPF4 can play a critical role in ensuring that across the entirety of the planning system in Scotland – from national to local level – a strong focus on sustainability is present at all decision-making points, supporting a collaborative approach in tackling the climate emergency.

We have identified three areas where we believe NPF4 could support our Strategic Plan and our efforts in responding to the climate emergency:

1. Surface water management
2. Water efficiency
3. Low carbon heat, electricity and transportation

1.1 Surface Water Management

The management of surface water is a complex issue with a number of agencies having distinct and established statutory responsibilities enshrined in legislation, with no single organisation that oversees how surface water is managed in its entirety. We work in conjunction with local authorities to develop

integrated catchment studies, for example, understanding the flows that are the responsibility of either the local authority or Scottish Water to manage, and those where the responsibility is shared. In adapting to the effects of climate change, we will need to become ever better at joint working, and ensure that all parties with drainage responsibilities can access the finance needed to undertake upgrade work and, where appropriate, find ways of funding and delivering work together.

In our Strategic Plan we highlight that we plan to lead the transformation of the management of surface water, working in partnership with the Scottish Government, local authorities, SEPA, house builders and communities. The [Metropolitan Glasgow Strategic Drainage Partnership](#)¹ is a good example of how this partnership work can result in the effective and sustainable management of rainfall to end uncontrolled flooding and improve water quality. We have recently joined forces with the Scottish Government, SEPA and local authorities across the Edinburgh and Lothians region (City of Edinburgh Council, East Lothian Council and Midlothian Council) under the Edinburgh and Lothian Drainage Partnership to plan for future growth and changes in climate that impact on how the area's waste water and surface water is processed. This model should be supported and applied throughout Scotland.

We intend to promote blue-green approaches and drive innovative solutions to reduce flooding and pollution and create better places to live.

We have recently launched our Storm Water Management Strategy which aims to improve, protect and recover the hydraulic capacity of the sewer system and can be summarised as:

1. Preventing new surface water from entering the existing combined sewer network.
2. Working with stakeholders to remove and reduce existing storm water from sewers by preventing it from entering the network.
3. Supporting continued economic growth for all stakeholders.
4. Restricting surface water discharge into the combined sewer network. This will result in a long-term reduction in carbon emissions, as we reduce the need for pumping and unnecessary treatment processes of surface water. It will also reduce flood risk for existing customers and support economic development across Scotland by providing additional capacity in our system.

We believe NPF4 can support us in delivering our strategy by:

¹ The partnership's members are Glasgow City Council Scottish Water, SEPA, Clyde Gateway, Scottish Canals, The Scottish Government, Clydeplan, Scottish Enterprise, South Lanarkshire Council, North Lanarkshire Council, East Dunbartonshire Council, Renfrewshire Council

- Requiring surface water drainage considerations to be made at the earliest possible stage in the development planning process, when land to be set aside for new development is being identified.
- Requiring Local Development Plans to designate surface water corridors/routes at strategic or catchment level to ensure flows during flood events are safely routed away from buildings.
- Requiring Development Plans to allocate land for strategic blue-green infrastructures that manage and convey surface water on the surface and support multiple developments;
- Apply buildings standards that support the installation of sustainable surface water management systems at property level such as green roofs, water butts, rain gardens and porous paving, whilst minimising impermeable surfaces and the volume of surface water entering piped systems.
- Encouraging local authorities to consider, where appropriate, land included on the Vacant and Derelict Land Registry as spaces that can be utilised to manage surface water while creating enjoyable and usable amenity space for the local community during dry weather periods.
- Requiring Local Development Plans to identify, with the support of Scottish Water, opportunities for retrofitting sustainable drainage solutions that remove surface water from the combined system and mitigate the impacts of existing or future flood risk.

1.2 Water Efficiency

The nature of our water environment is changing with recent weather patterns resulting in increased pressure on drinking water supplies in some regions of Scotland. Inspiring our customers to use water wisely is one of the ways in which we will ensure that there is sufficient availability of source water that can be treated and supplied to our customers both now and in the future, even during more extreme droughts.

Reducing the demand for water is also part of Scottish Water's road map to going beyond net zero by 2040. By introducing a more co-ordinated approach to water efficiency between government, regulators and stakeholders, customers will be better informed on how using water wisely contributes to a reduction in their own carbon footprint, in particular through heating less hot water and saving money on their energy bills.

We believe that to achieve a sustained reduction in water consumption we need a combination of behaviour and infrastructure change supported by planning decisions. NPF4 can support this by:

- Supporting further collaboration between multiple stakeholders to develop mandatory water efficiency standards for domestic and non-domestic building regulations for both new build and retrofit programmes. This will allow water efficiency to be considered in the same manner as energy efficiency standards.
- Ensuring water is given the same weighting as energy when labelling housing as "Green".
- Developing and applying building standards that support water efficient homes. For example, by supporting the implementation of water re-use technology.

- Applying minimum fittings standard regulations to remove sub-standard products from the market. This should be under-pinned by a UK mandatory water label allowing consumers and developers to make more informed decisions in the marketplace.

1.3 Low Carbon Heat, Electricity and Transportation

We have already made great progress in reducing our operational carbon footprint by 41% since 2006. We are committed to achieving net zero emissions by 2040 and going beyond that thereafter. In our Strategic Plan we set out the measures that will help us achieve this commitment including:

- Increasing our own and hosted renewable energy generation from 200% to 300% of our electricity usage by 2030.
- Seeking out new technology to eliminate greenhouse gas emissions from our processes, fleet and buildings, working with our regulators where innovative approaches are required
- Developing a new 'circular economy' waste water recycling and recovery concept that will convert sewage into energy and recover nutrients and bio-resources and build partnerships to maximise the unique opportunity that we have for recovering heat from our sewers.
- Transforming how surface water is managed.

The NPF4 can support us in achieving our beyond net zero emissions strategic outcome by:

- Championing the transition to the electrification of transport by increasing the pace of deployment of electric vehicle charging points as well as considering infrastructure requirements that would support alternative fuel provision for heavy goods vehicles (e.g. bio methane, hydrogen and compressed natural gas).
- Enabling a greater implementation of district heat networks (DHN) through instigating a systematic evaluation within local development plans of potential or existing energy centres in the vicinity.
- Ensuring that any heating infrastructure put in place is future-proofed or easily adapted for linking in to low carbon heating sources such as bio gas/bio methane produced through the digestion of bio resource (sludge) or by recovering heat from wastewater. One of our most recent projects is the Stirling District Heat Network which uses heat from waste water technology alongside a combined heat and power engine to generate low emissions energy – the first time these two technologies have been used together in this way in the UK.
- Continuing to support enhancements to the electricity grid capacity to facilitate connection for renewable electricity generation.

Question 2: How can planning best support our quality of life, health and wellbeing in the future?

Within our Strategic Plan we set out how we will enhance the natural environment, reduce the water we take from the natural environment and use our land and assets to increase biodiversity, planting trees, restoring peatlands and creating better places to live. We will work with the Scottish

Government, regulators, and developers to secure policy and planning approaches that achieve a sustainable urban drainage landscape, increase the resilience of our water supplies and enhance urban living and biodiversity.

We have set out in the section above some of the ways in which NPF4 can support us on achieving this aim through enabling the implementation of blue-green infrastructure. Well designed and connected blue-green corridors have added place-making attributes, by providing accessible green spaces/networks to be enjoyed and used by communities, as well as enhancing biodiversity, amenity value and improving climate resilience.

We operate assets critical for the provision of drinking water and the treatment of waste water. These assets were often built to be located away from settlements. However, as the landscape of our towns and cities continues to change and settlements expand in close proximity of these essential assets, this can present a significant challenge in addressing odour and noise complaints from residents. While we will continue to work with local authorities to assess land allocations and shape Local Development Plans, we would be supportive of local authorities proposing land in the immediate vicinity of these assets for industrial use, in preference to housing.

Question 3: What does planning need to do to enable development & investment in our economy to benefit everyone?

The provision of surface water and foul drainage infrastructure is a key consideration to support development. We would encourage collaboration between stakeholders at the earliest possible stage in the development planning process to ensure that this infrastructure is planned and delivered effectively and sustainably, within the planning system the framework. In our Strategic Plan we set out how we intend to support sustainable economic growth by continuing to work collaboratively with developers, planning authorities and other agencies to understand the timing and scale of their new developments. We will also encourage development where we already have capacity and will develop schemes for new strategic capacity where it is highly likely that capacity expansion will be required, and where it is most cost effective to do so.

Question 4: What does planning need to do to enable development & investment in our economy to benefit everyone?

We have no further comments to make beyond those points made against the other questions.

Question 5: What infrastructure do we need to plan and build to realise our long-term aspirations?

Infrastructure and readiness to enable development play a critical role in the success of long-term aspirations at a national and local level. Scottish Water is supportive of the objectives to move to an “infrastructure first” approach to enable development. However, this must be a balance of delivering infrastructure just ahead of need and ensuring this represents good value for investment of

public funds as outlined in the section above. We will continue to work closely with planning authorities and the wider development community to enhance forecasting of future growth across Scotland.

As well as water, waste water, drainage and low carbon energy infrastructures which we have covered in question 1 above, digital infrastructure will play a key role in achieving both the NPF4 objectives and our service excellence strategic ambition by:

- Facilitating greater engagement with residents/customers, businesses and across communities throughout Scotland in decision making processes so we can all meet their evolving expectations.
- Supporting the planning framework to become fully digitally connected with communities across Scotland.
- Supporting the implementation of new technologies that will allow us to manage our assets more efficiently.

We are looking forward to the launch of the Digital Strategy for Planning which will be instrumental in making the planning process more efficient and inclusive.

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