

Water, Wastewater and Drainage Policy Consultation

1.	<p>Do you agree that Scotland needs to set out a plan to manage our water resources, for now and into the future?</p> <p>Yes/No</p>
Yes	
2.	<p>To what extent do you agree that taking a national view of catchment risks will help better protect drinking water sources from pollutants?</p> <ul style="list-style-type: none"> • Strongly agree • Agree • Neither agree nor disagree • Disagree • Strongly disagree
Strongly agree	
3.	<p>To what extent do you agree or disagree that everyone in Scotland needs to use less drinking water?</p> <ul style="list-style-type: none"> • Strongly agree • Agree • Neither agree nor disagree • Disagree • Strongly disagree
Strongly agree	
4.	<p>How do you think people and businesses could use less drinking water?</p>
<p>As the consultation outlines, the average person in Scotland uses 180 litres of water per day, in comparison to other European countries like Germany (125 litres) and Denmark (105 litres). We recognise there are several reasons that it is vital people and businesses use less drinking water, in particular the process of treating and distributing water is energy intensive and saving water will therefore also save energy. Reducing water consumption will also mean that we will not need to invest in finding and treating new sustainable water sources, reducing the future cost of investment. We all have a responsibility to protect water resources, reducing the need for new reservoirs whilst allowing all users access to water and continuing to protect the quantity of water available in the environment.</p> <p>We have looked at a variety of sources to understand how best to encourage people and businesses to use less drinking water. This has included other water companies, energy companies and societal behaviour change campaigns. The following are our key suggestions for how people and business could be encouraged to use less drinking water:</p> <ul style="list-style-type: none"> • Customers should be provided with better visibility of how much water they use as this will ensure that they are better informed and can identify opportunities to reduce 	

consumption. Monitoring water use at both domestic and non-domestic properties would also allow Scottish Water and our customers to identify anomalies and target interventions to reduce leaks from the water system.

- Awareness of the environmental impacts of increasing abstraction of water from the environment should be raised, with customers encouraged to use other sources of water for activities where high-quality drinking water (which requires energy intensive treatment and distribution) is not required (eg watering gardens, washing cars).
- Significant gains have been made in energy reduction through product design, whereby better design leads to less energy intensive products which do not detract from the user’s experience. Whilst some products do exist for water efficiency eg more water efficient taps and showers, there are significant opportunities to further reduce water use through other means, in collaboration with industry stakeholders.
- All new developments should be water-neutral by design, ie they have no impact on water demand in the area. This can be achieved by minimising additional demand as far as possible and offsetting the remaining new demand, so that the total demand on the public water supply in a defined region is the same after development as it was before.
- Building Standards and Regulations should better promote and encourage water re-use and water efficient design. For example, enabling the use of water from sinks and washing machines to flush toilets and taking advantage of more water efficient products to drive a reduction in both water and energy consumption.
- During the planning phases, businesses that use water in their operations should outline strategies for minimising the use of high-quality drinking water, for example using rainwater or untreated water supplies for washing or cooling purposes. This proactive approach aligns with the principles of sustainable water management and encourages businesses to explore and implement more environmentally friendly water sourcing practices.
- Fixtures, fittings, and appliances should have water usage labels that demonstrate how efficiently the appliance uses water. The benefits of water labelling would build over time, as existing products are replaced with more efficient versions. Recent analysis by the Energy Saving Trust suggests up to 48 litres per person per day could be saved over 25 years, and almost 6 million tonnes of CO2 saved over the same period.
- We also strongly believe that raising awareness and creating engagement around water usage and the value of water should start from the earliest stages of education and continue throughout school years. This is essential to enable future generations of customers and water users to make better and more sustainable choices.

5.	Would you like to know how much water you use in your home? Yes/No
Not applicable	
6.	Would you seek to reduce your water usage if this avoids building expensive new reservoirs and water treatment works?

	Yes/No
Not applicable	
7.	Would you know where to find information on using less water?
We have a section on our website dedicated to water saving advice and helping our customers to calculate how much water they use. Water is Always Worth Saving - Scottish Water	
8.	<p>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?</p> <ul style="list-style-type: none"> • Strongly agree. • Agree • Neither agree nor disagree • Disagree • Strongly disagree
Strongly Agree	
9.	<p>To what extent do you agree or disagree that all of Scotland's plumbing should be made lead-free?</p> <ul style="list-style-type: none"> • Strongly agree • Agree • Neither agree nor disagree • Disagree • Strongly disagree
Strongly agree	
10.	<p>Would you know where to get information on how to ensure that your pipes are not affecting your drinking water?</p> <p>Yes/No</p>
Not applicable	
11.	<p>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?</p> <ul style="list-style-type: none"> • Strongly agree. • Agree • Neither agree nor disagree • Disagree • Strongly disagree

Strongly Agree

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

We collaborate closely with Local Authorities to assist individuals and communities facing challenges with private water supplies.

Based on our experience, private water system users and owners, particularly those that want to remain on a private supply, would benefit from free and impartial advice and support provided by an independent agency or a division of an existing agency.

The ideal agency would offer a range of free services, employing a team of experts to provide technical advice on private water systems. They would work with communities to explore available options, helping users organise themselves and reach a consensus on the best courses of action. This will become increasingly important as the impacts of climate change increase dry weather events such as droughts, affecting both the amount of water available and its quality.

This agency could serve as a central hub for information and advice on private water systems, directing users to sources of grants and financing options, and connecting them with qualified tradespeople to manage and repair their assets. Scottish Water would be happy to play a role in ensuring private supplies are of good quality, for example by carrying out water sampling activities leveraging our existing expertise. We could also play a part in contributing to the provision of technical advice to be offered by an independent agency.

For many private supply users the substantial upfront costs associated with upgrading private water systems, or connecting to public networks, can be a barrier to ensuring they have a consistently safe supply of drinking water. Even relatively straightforward upgrades or connections to the public supply can be unaffordable for some community members. The ability to spread costs over time, new grants or low-interest loans with flexible repayment conditions, could facilitate upgrades or connections. Establishing a credit union or community fund through a charge on households could support the advisory service and provide access to low-interest loans.

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

Water Resource Planning

Water is fundamental to Scotland's society and economy. Not only for Scottish Water's customers, but also for the energy, manufacturing, agriculture, aquaculture, food, and drink sectors, many of whom take water directly from the environment.

The impacts of climate change (such as increased frequency and severity of drought conditions) will result in a reduction in availability of water resources, leading to difficult decisions regarding prioritising the use of this valuable resource; and to an extent that Scotland has not faced to date.

For agriculture, a warmer climate may result in increases in growing seasons and productive areas, while reductions in rainfall will increase demand on the water environment for irrigation. This presents a risk for the water sector and food security. Similarly, water use will play a key role in how the energy sector will facilitate the just transition to Net Zero through hydropower and low carbon fuels.

We strongly support the development of a system of integrated water resource management to manage water resources equitably, efficiently, and sustainably between all sectors of business and society. This includes enhancing the resilience of our essential public water supplies to ensure continued provision in a future impacted by climate change.

Given the above, we fully support the Scottish Government’s intention to develop a plan to manage Scotland’s water resources now and into the future through the development of long-term water resource planning. This activity should be carried out and monitored by an independent body with appropriate powers. We suggest this should extend to the inclusion a long-term vision for the water environment to ensure all stakeholders have a common view of what the future may look like and what their contribution might be. This will ensure that all stakeholders clearly understand the role they need to play in the short, medium, and long term to reduce pressures on the water environment brought by the changing climate.

Catchment Management

Protecting the quality of water at source is essential and reduces the cost of water treatment over the long term as the quality of the water will not be deteriorating due to poor catchment management activities. We believe that a national view of catchment risks would facilitate system thinking, allowing all stakeholders to have a holistic view which takes into account the dynamic relationships influencing a catchment area. This could enable more focus on activities and policies that support the environmental principles set out in the Scottish Government’s [“Consultation on environmental principles and Governance in Scotland”](#).

Water Quality

We agree with the Scottish Government’s intention to ensure all plumbing should be lead free. Given the difficulty for Scottish Water in identifying and replacing lead pipes within the boundaries of customers properties, we suggest that more should be done to increase customer awareness of the potential for lead pipes in their plumbing, and more support to locate and replace these should be made available to customers.

- 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,
 - 14. • Scottish Water,
 - Local Authorities,
 - Scottish Environment Protection Agency (SEPA),
 - Landowners,
 - Farmers,
 - House builders,
 - Community groups
 - Others [PLEASE GIVE DETAILS]

We believe that all of the bodies listed above have a role to play in changing how we manage rainwater in Scotland. Additionally, a significant proportion of both household and business premises are leased rather than owner-occupied and therefore landlords, property owners, housing associations and others also have a role to play. Major

	landowners such as Nature.Scot and Historic Environment Scotland will also have a role. Energy companies and others who currently use water abstraction should be included to enable rainwater to be used as an alternative. This strengthens the need for a broader ecosystem approach in the management of rainwater.
15.	<p>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?</p> <ul style="list-style-type: none"> • Strongly agree • Agree • Neither agree nor disagree • Disagree • Strongly disagree
	Strongly agree.
16.	<p>What would you/your organisation be willing to do in your home/property to manage rainwater differently?</p> <p>For example, disconnect your down pipes from the sewer, have permeable driveways, install water butts and/or rain gardens.</p>
	<p>Scottish Water has been actively assessing the properties in our portfolio to consider how we can manage rainwater differently. For example, we have installed two rain garden planters at our Prestwick office, attenuating about 100m² or 25% of the office roof area. This reduces roof runoff and contributes to reducing peak flows in the combined sewer. We are also in the process of installing tree pits at Bullion House, our office in Dundee. Our newest office, The Bridge in Stepps, Glasgow, harvests rainwater from the roof to be used to flush toilets and urinals. Low water use showers and toilets are also installed in the building.</p> <p>In addition to making adjustments to our properties, we are working with Glasgow City Council and Wellhouse Housing Association to develop an innovative project to improve rainwater management and reduce flood risk in the Wellhouse area. As part of this work, we are promoting the creation of rain gardens and planters for properties to slow down or reduce rainwater entering the drainage system. We are keen to apply similar partnership approaches throughout Scotland.</p> <p>We also support and promote rainwater harvesting and community rainwater schemes so that less rainwater enters the sewer system, and customers and communities have easy access to a non-potable source of water. (Water Saving Advice)</p>
17.	<p>Would you know where to find information on how to best manage rainwater in your property?</p> <ul style="list-style-type: none"> • Yes / no
	Yes
18.	<p>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?</p> <ul style="list-style-type: none"> • Strongly agree • Agree

	<ul style="list-style-type: none"> • Neither agree nor disagree • Disagree • Strongly disagree
Strongly agree	
19.	<p>What should Scotland’s drainage systems look like in the future?</p> <ul style="list-style-type: none"> • Grey infrastructure only (drains, pipes, tanks) • Blue-green infrastructure (rain gardens, green roofs, SUDS ponds, basins, wetlands, swales, etc) • A combination of both grey and blue-green infrastructure
A combination of both.	
20.	<p>Do you have any further views on how Scotland should manage rainwater in the future?</p>
<p>A combination of both grey and blue-green infrastructure is the best approach to delivering a resilient drainage system now and in the future. The impacts of climate change and the increase in extreme weather events mean we cannot rely solely on new or larger sewers to manage rainfall. Using only traditional grey infrastructure (eg storage tanks and underground pipes) also wastes a precious water resource, increasing future investment costs to unsustainable levels and depriving society of the wider benefits of managing water on the surface eg rain gardens. However, in some instances, a blue-green solution is not viable to meet all of our obligations to customers, stakeholders, regulators, and the environment. Therefore, the best approach is a mixture of both.</p> <p>Following on from this we believe that everyone in Scotland has a role to play in reducing the amount of rainwater that enters the sewer system to establish a shared vision for the future of rainwater management. The Scottish Government’s Water Resilient Places Policy Framework goes some way to address this, and it should serve as the foundation for establishing common objectives among stakeholders.</p> <p>The Flood Risk Management (Scotland) Act 2009 - Delivering Sustainable Flood Risk Management guidance contains key principles that should be applied by all organisations and individuals to the planning and design of surface water drainage networks. We suggest that the requirement to apply these principles should be strengthened and include consideration of resource recovery (eg rainwater harvesting). This should be further supported by stronger controls on urban development to prevent increased rainfall runoff and be applied to retrofit development.</p> <p>It is our view that blue-green infrastructure, serving both as an asset to manage rainwater and as a contributor to place-making, should be a major part of Climate Adaption and Resilience Plans. This will ensure that during Local Authorities’ planning processes sufficient consideration is given to prioritising this type of infrastructure.</p> <p>Blue-green infrastructure is fundamental in future-proofing Scotland's drainage systems by safeguarding and increasing the capacity of the existing and ageing combined drainage system. Collaboration between Local Authorities, Scottish Water, and other stakeholders is key to its successful delivery. This should be supported by clear frameworks and funding mechanisms for ownership, operation, and maintenance of rainwater drainage assets. We believe the Scottish Government should also consider a move towards a more holistic public sector approach and consider restructuring/combining agencies to boost focus on</p>	

Scotland's priorities as well as best value for money.

Finally, the legislative and regulatory framework governing the management of rainwater is complex and at times misaligned, particularly with regards to the responsibilities of organisations (public and private) and individuals. We would suggest that a review should be carried out to ensure better alignment and consistency across legislation. Appropriate legislation is crucial to protect existing and future drainage networks, focussing on reducing rainwater reaching the combined sewer network, limiting connections, taking rainwater out of the existing combined system, and preserving infrastructure.

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

Yes/no

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
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Strongly agree.

23. **How do you think we can change behaviours to avoid the disposal of substances or matter in the toilet/sewer (e.g. wet wipes, cotton buds, nappies, and hygiene products etc.)?**

Everyone can contribute greatly towards the smooth operation of our sewer network by disposing of wipes and other bathroom items in the bin (not down the toilet), and not putting fats, oil, or grease down the sink.

Our *Nature Calls* Campaign promotes the idea that customers should only flush the 3Ps: pee, poo, and (toilet) paper. Everything else should go in the bin to help protect our environment. People should be encouraged to keep a bin in the bathroom so that they can quickly, safely, and hygienically dispose all the 'do not flush' personal items, noting that most of these items contain plastic. We fully support the proposed UK ban on wet wipes containing plastic as they do not break down in our sewer network and lead to blockages. We encourage everyone to support this ban via our Nature Calls website: [Ban - Scottish Water \(yourwateryourlife.co.uk\)](http://Ban-ScottishWater.yourwateryourlife.co.uk)

Issues caused by disposing of fats, oils and grease (FOG) down the sink need greater awareness raising and promotion. Despite the perception that FOG easily go down the kitchen drain they pose a significant problem when they cool and congeal in our sewer network. The combination of these fats with other materials in the sewer system leads to blockages and the formation of fatbergs. It is a misconception that pouring hot water down the sink helps dissolve FOG, as fats – whether saturated (eg lard), mono-unsaturated (eg olive oil), or vegetable oil – tend to congeal and harden, exacerbating the issue.

We strongly believe that the education of future generations on these issues through

school programmes is critical and will reap benefits now and in the future. Behaviours that lead to the blockage of the sewer network should be viewed as socially unacceptable. Children and young people can be a positive force in this respect by both influencing the behaviour of adults in their homes and carrying these messages and behaviours into their own adult lives.

Our current digital Education Hub provides materials for primary and secondary pupils to learn about the water cycle, how it is affected by climate change and how Scottish Water works with nature's cycle. We recently launched the first phase of *Generation H₂O*, a new Scotland-wide programme to encourage young people to care for the nation's most precious natural resource and become responsible water citizens. We developed the programme with an education partner *We Are Futures*. It is linked to the Curriculum for Excellence and there is easy access to resources through the National Schools Partnership ([Scottish Water Generation H₂O - Primary - National Schools Partnership](https://www.scottishwater.co.uk/About-Us/News-and-Views/2023/11/171123-Inverness-FOG)). We also give practical lessons and demonstrations in classrooms across Scotland.

Working in partnership with local communities to target messages has also been shown to have a positive impact. In Inverness, analysis of issues reported to us identified a hotspot of 192 sewer blockages in the city centre over a three-year period, focused within less than half a square kilometre. In response, members of the local business community have been working with Scottish Water, The Highland Council and Zero Waste Scotland to develop new ways of engaging businesses that serve hot food, to raise awareness and make lasting improvements.

<https://www.scottishwater.co.uk/About-Us/News-and-Views/2023/11/171123-Inverness-FOG>

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:

24. **• include other pollutants, and specifically plastic? [Yes / No]**
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• extend the offence to household premises? [Yes / No]

Please provide information to support your answer

Yes, to both questions.

Raising public awareness should always be the priority for tackling the inappropriate disposal of items to the sewer, with enforcement being considered for more serious cases. Wider options for enforcement would support a more proportionate regulatory framework than exists at present.

We would support the introduction of new offences related to the improper disposal of other pollutants into drains and sewers as currently applies under Section 46B of the Sewerage (Scotland) Act 1968 related to fats, oils, and greases.

This would clarify where a person commits an offence by discharging specific matter or substance into a drain or sewer and would give Scottish Water the power to recover additional costs incurred related to any damage caused. A specific example of this would be to introduce a new offence related to disposing plastic matter into a drain or sewer, which would align with new legislation aimed at restricting single-use plastic products.

In relation to trade effluent, where a person commits an offence under the Sewerage (Scotland) Act 1968 - currently, the only enforcement option available to Scottish Water is to seek prosecution through the Crown Office and Procurator Fiscal Service. Powers for Scottish Water to issue statutory enforcement notices and alternative enforcement powers when offences are committed would enable Scottish Water to take more proportionate and targeted enforcement to prevent and resolve non-compliance and prevent pollution. Prosecution via the Crown Office and Procurator Fiscal Service would still be available in the most serious offences. This would facilitate better regulation without increasing the workload of Crown Office and Procurator Fiscal Service.

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?

25.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Strongly agree

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

Yes/No

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?**

This could include use of scarce resources and increase recycling of reusable materials that might otherwise be sent to landfill.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Strongly 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/No

Yes

29.	What support do owners and users of private wastewater systems require to best protect the environment?
<p>Private wastewater systems such as septic tanks provide an effective, local, and sustainable treatment solution in many instances, when managed and cleaned regularly. The introduction of a requirement for a regular service check, to ensure proper maintenance is being undertaken and to assess if environmental harm is being caused, would decrease the risk of these assets negatively impacting the environment. Priority needs to be given to ensuring all private systems are registered, and that a complete register is put in place and maintained to enable appropriate monitoring of these systems and their potential impacts on the environment.</p> <p>Similar to private water supplies, private wastewater system owners and users would benefit from access to information and advice that improves their understanding of how their system might impact the environment and how best to maintain it by setting out minimum requirements.</p>	
30.	<p>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?</p> <ul style="list-style-type: none"> • Strongly agree • Agree • Neither agree nor disagree • Disagree • Strongly disagree
Neither agree nor disagree	
31.	Do you have any further views on public and private wastewater systems?
<p>Wastewater collection and treatment</p> <p>We support the setting of a legislative framework for wastewater collection and treatment that is in the best interests of Scotland and takes a sustainable and holistic view of the environment. The framework should be proportionate to the environmental or public health risk and enable the use of nature-based and innovative solutions where these are appropriate to deliver an overall benefit to the environment.</p> <p>Overflows</p> <p>In our Improving Urban Waters Routemap, we commit to improving the quality of waterbodies, increased monitoring of Combined Sewer Overflows (CSOs), reducing sewer-related debris, and minimising spills from the sewer network. We would support an approach that addresses the environmental impact or public health risk posed by overflows, to allow flexibility in monitoring and spill-management regulations for optimal funding allocation, prioritising those CSOs causing a negative impact.</p> <p>Wastewater monitoring</p> <p>We currently undertake a programme of monitoring for emerging contaminants of concern. We would welcome a clear duty to expand this programme so that the risk from wastewater routes to the environment can be better understood and the most appropriate and sustainable interventions can be identified, noting that in many circumstances these will include source control measures.</p> <p>We presently work with Public Health Scotland to take samples from our wastewater network; these are independently analysed for the presence of pathogens that Public</p>	

Health Scotland wishes to monitor and would welcome formalisation of this arrangement, with flexibility to adapt to public health priorities.

Connection to public network / private systems

We would not be supportive of a blanket retrofit to the public sewer network as this is likely to limit the fast uptake of innovative approaches and opportunities for sustainable integrated systems (eg energy capture). Given the global move to decentralised systems particularly for rural developments, we suggest that connection to the public sewer network should only be mandatory where it delivers environmental benefits.

Well-maintained private systems, regulated under Controlled Activities Regulations (CAR), offer sustainable local treatment. We suggest it would be beneficial to strengthen both CAR and planning guidance to ensure adequate private waste provision where this is the most appropriate solution. We support connection to the public system where this delivers an environmental benefit that cannot otherwise be achieved through the continuing use of a private wastewater systems, and where the environmental benefit is proportionate to the cost.

Private infrastructure

We are regularly impacted by flooding from poorly maintained infrastructures that are not owned by Scottish Water, for example privately owned surface water pipes that discharge directly to a water course, or misconnections to the surface water sewer. We would strongly support any initiatives that enable private owners to ensure their infrastructure is appropriately maintained and adapted to the changing climate.

Resource recovery

The focus of the Circular Economy has added emphasis to the importance of using resources wisely. We would support a legislative framework that allows more flexibility to invest in recovery facilities beyond our regulated activities where they deliver a wider benefit to Scotland.

32.	<p>What extent do you agree that changing our behaviours is essential to limit charge rises?</p> <ul style="list-style-type: none"> • Strongly agree • Agree • Neither agree nor disagree • Disagree • Strongly disagree
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Strongly agree

33.	<p>Do you agree that we should recognise that there are three services (water, wastewater, and drainage)?</p> <p>Yes/No</p>
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Yes.

34.	<p>Do you agree that using Council Tax Bands is the fairest way to charge for services used by households?</p>
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- Yes/No
- Other [please provide further information on your answer]

Other

The use of Council Tax Bands as a basis for water and waste charges to households has advantages, such as ensuring all customers contribute to service costs and linking charges to potential water use based on property size. This approach also allows for exemptions, discounts, and reliefs to support vulnerable customers through established Council processes.

Billing water and waste charges alongside Council Tax promotes cost-sharing between Scottish Water and Local Authorities, leveraging the high collection rates involved. Direct billing by Scottish Water would likely incur additional administrative costs for customers.

However, the system's dependency on Council Tax as a local taxation basis poses a challenge. Any changes or replacements to Council Tax in the future could impact the ability to bill and recover water and waste charges through Local Authorities. Therefore, new legislation should ensure Scottish Water has the power to bill and collect charges directly from households, should this be deemed to be the appropriate approach in the longer term.

It is crucial to acknowledge that, regardless of the charging mechanism, significant ongoing investment is necessary to maintain core services and build resilience to climate change.

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

As mentioned in response to Question 4, it is vital that people and businesses use less drinking water, and we have made several suggestions as to how households and business could be encouraged or incentivised to reduce water usage to levels that are sustainable for Scotland, including:

- **Monitoring consumption:** Providing improved consumption data and visibility to households, allowing comparison to similar premises, complemented by campaigns to promote water efficiency and identify opportunities to reduce demand. Better household consumption data can also significantly support leakage detection and reduction.
- **Education programmes:** Raising awareness of the value of water, the need to reduce consumption, and its link to carbon emissions.
- **Access to water efficiency resources:** Providing tools such as water audits to customers.
- **Rebate scheme to encourage the purchase of water efficient products:** Offering rebates based on efficiency, encouraging the adoption of new designs and technology.
- **Supporting innovation:** Backing industries and movements which are developing ground-breaking designs, such as closed-loop showers that use significantly less water and energy. Scottish Water is currently a member of the global 50L Home

Coalition, who are working to create sustainable solutions to the water crisis.

- **Targeting landlords and property owners:** Implementing legislative changes to ensure minimum water efficiency standards, measuring consumption, and programmes to reduce water use in leased premises.
- **Competitive market incentives:** Encouraging businesses to reduce water usage through Smart Metering and commercial incentive programmes.
- **Rising block tariff for business customers:** Shifting from a decreasing to a rising block tariff for volumes above calculated domestic use purposes.
- **Business-specific programmes:** Identifying opportunities to reduce water use in production processes and incentivising with a pay-back programme.

36.

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

There are several areas where households and businesses can be incentivised to manage rainwater differently to reduce sewer system entry. These incentives can be positive, negative, or unseen measures.

- **Enforcement powers:** Adequate powers are needed to enforce land drainage and management without causing flooding. This will require access to others' land and the ability to take action to disconnect surface water from the combined system where this is necessary to protect the drainage or sewerage system.
- **Strengthening source control:** There is a need to strengthen requirements for households and businesses to manage rainwater “at source” before it enters the public system, for example using porous surfaces, green roofs, or water butts. This should be supported and enabled by amending building standards regulations to provide clear guidance on techniques and tools to be considered in the design of buildings.
- **National technical guidance:** A new set of national technical guidance for drainage assets, and particularly blue-green infrastructure and Sustainable Urban Drainage Systems, is required. Current guidance is limited and differs across Local Authorities, posing a challenge for developers looking to apply a standard approach when building drainage infrastructure. The current existing guidance is contained in Sewers for Scotland v4.0 which is limited to assets that Scottish Water will adopt.
- **Illustrating the impact of local resource management:** Illustrate how managing resources locally can positively affect the same resource elsewhere in the community.
- **Implementation of best practice:** Consider best practices from places like Philadelphia to design incentives and disincentives to support households and businesses in how surface water is managed.
- **Drainage charges for business customers:** Consider basing drainage charges on surface area rather than Rateable Value for businesses, incentivising rainwater redirection away from the public sewer.

- **Subsidised interventions:** Explore subsidies for interventions by Scottish Water which avoid greater investment costs and the expansion of our sewer network capacity.
- **Recognising a separate drainage service:** We agree that defining three separate services (water, wastewater and drainage) will ensure greater clarity in how our customers' charges are used to deliver each service. We are unclear at this stage how this will link to the current charging scheme and welcome further discussion on this matter. Providing more visibility of the proportion of customer charges allocated to the drainage function can also increase customer awareness of the cost of maintaining drainage infrastructure now and in the future.

37.	<p>To what extent do you agree that all households and businesses should pay for roads to be drained?</p> <ul style="list-style-type: none"> • Strongly agree • Agree • Neither agree nor disagree • Disagree • Strongly disagree <p>Please provide further information to support your answer</p>
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Strongly agree.

The cost of draining public roads and paths is significant and it might be considered reasonable that the costs should fall on the people and organisations that benefit from this. Roads need to be considered as an asset in the drainage system and any changes to them should be considered with this in mind. Approximately 50% of water in combined systems comes from road drainage and therefore it is important to manage this more sustainably, removing and/or attenuating what enters the combined system.

- End of Document -