

# Response ID ANON-ACUW-WS6Z-A

Submitted to **Water Supply & Waste Water Treatment Sector Plan**

Submitted on **2019-02-14 12:00:57**

## Introduction

### 1 What is your name?

**Name (optional):**

Katy Dickson (Scottish Land & Estates)

### 2 What is your email address?

**Email (optional):**

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### 3 What is your interest in the Water & Waste Water Treatment Sector Plan?

**Answer:**

SLE represents rural land based businesses. Many of our members are responsible for private water supplies and sewerage systems.

## Water & Waste Water Treatment Sector Plan

### 4 Do you agree with our vision for the sector?

Agree

**If you don't agree, or only agree in part, please give your reasons and suggested alternatives :**

SLE is supportive of the ambitious aim of creating a circular economy for its water supply and waste water sector. The only reason we hesitate to 'strongly agree' is that we seek further reassurances that those responsible for private water supplies and private waste water treatment are adequately supported (in terms of access to finance and appropriate expertise) to achieve these aims.

### 5 Does the plan identify all the key partners and influencers that might be able help in achieving our vision?

Disagree

**If no, please suggest different partners and influencers that we could work with, giving reasons for your suggestions:**

There is limited reference to working with technical specialists in relation to physical infrastructure needed to achieve the plan.

Where land managers are identified, it is only in relation to water supply catchments to help reduce pollution risks to raw water quality. Land managers also have a key role in providing wholesome water supplies for human consumption (for example, in replacing lead piping, maintaining water quality etc.) and installing hydro schemes, and this role should not be overlooked.

In particular, the action points relating to private water supply and waste water systems initially only make reference to Scottish Government and 'other partners'. There should be mention of land managers, communities and small businesses here as they are critical to ensuring the success of the outcomes sought.

### 6 Have we identified the right set of actions to help achieve our vision and further improve the environmental performance of the sector?

Not sure

**If no, please suggest additional or alternative actions, giving reasons for your suggestions:**

We support the actions but have concerns that 'working with...' is not a detailed enough action to bring comfort that the outcome will be delivered.

Specifically, the actions on private water supply and waste water systems note that SEPA will work with Scottish Government and other partners, however, it does not set out what that work will be. We are already aware that new regulations in relation to private water supplies for human consumption will require local authorities to monitor more supplies; and relevant persons will be required to maintain and upgrade supplies that fall below the required standard. We would therefore like to know how SEPA's action point here is intended to coincide with newly implemented regulations. We would welcome further detail and discussion on this.

There is also an opportunity here to outline how SEPA, working with others, can help support those with responsibility for water supplies to cope with any changes as a result of these actions.

It is also vital that the consequences and costs of achieving the outcomes are fully considered.

### 7 Do you agree with our proposals on where we should focus our work initially?

Not sure

**If you don't agree, please give your reasons and suggested alternatives :**

SLE is generally supportive of the targeted approach intended to impact on area where there is potential for more significant pollution. However, we would like to see greater consideration of the support given to those responsible for private waste water discharges, both in terms of financial and technical assistance. We note from your consultation that the transformation of waste water management systems will likely 'require significant upfront work and investment', however, you also assert that it could be 'cost-neutral' or even 'generate income' without going into any further detail. Upfront resources and investment will be a significant

barrier to our members' ability to help SEPA achieve its aims, so greater clarity would be welcome here.

**8 Do you agree with our proposals for streamlining and strengthening the way we regulate private waste water systems for new houses or extensions to existing houses?**

Not sure

**If not, please give your reasons and suggestions for alternative approaches:**

We welcome guidance that will clarify what is required in situations where there is a significant risk of pollution. However, we would also welcome additional information on support available so that those responsible are in position to act on the updated guidance.

We welcome the fact that SEPA has chosen to take a targeted approach in focussing on areas where a private sewage system could 'pose a risk of significant pollution', such as in bathing and shellfish waters. The level of regulation must be proportionate to the level of support offered to ensure individuals are able to meet those higher standards.

**9 Do you have any other comments you would like to make about the sector plan?**

Yes

**If yes, please provide them below:**

Regarding 'Leakage' on page 7, while we are pleased to see leakage trends are down, we are concerned that we continue to hear from members that Scottish Water continue to inadequately respond to reports of leakage.

Regarding 'Technology' on page 12, while we support the need for resilient and safe private water supplies, the costs of creating new boreholes will be a challenging barrier to overcome. Where current private supplies, regardless of their source, meet the new regulations we do not believe the owner should have to alter the supply.

We welcome the recognition that there will need to be 'new ways of incentivising and supporting change' and as described above look forward to more detail on this.