Water, Wastewater & Drainage Policy Consultation



Respondent Information Form

Please Note this form must be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy: https://www.gov.scot/privacy/

Are you responding as an individual or an organisation?					
	Individual				
\boxtimes	Organisation				
Full na	ame or organisation's name				
Pertl	h and Kinross Council				
Phone number		01738 475000			
Addre	ess				
2 Hiç	gh Street, Perth				
Postcode		PH1 5P	PH1 5PH		
Email	Address	Enquiries@pkc.gov.uk			
The Scottish Government would like y permission to publish your consultation response. Please indicate your publish preference:		n	Information for organisations: The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.		
\boxtimes	Publish response with name		If you choose the option 'Do not publish		
	Publish response only (without	t name)			
	Do not publish response		consultation in, for example, the analysis report.		
We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?					
	Yes				
	No				

Questionnaire

Question 1 Do you agree that Scotland needs to set out a plan to manage our water resources, for now and into the future?
∑ Yes No
Question 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 □ Agree □ Neither agree nor disagree □ Disagree □ Strongly disagree
Question 3 To what extent do you agree or disagree that everyone in Scotland needs to use less drinking water?
 □ Strongly agree □ Agree □ Neither agree nor disagree □ Disagree □ Strongly disagree
Question 4 How do you think people and businesses could use less drinking water? Please give us your views.
Planning regulations could be used to encourage developments where less water would be used such as micro homes. The Council has also undertaken a project to reduce the amount of drinking water used for hand washing etc to reduce costs and support climate change.

Question 5 Would you like to know how much water you use in your home?
Question 6 Would you seek to reduce your water usage if this avoids building expensive new reservoirs and water treatment works?
Question 7 Would you know where to find information on using less water?
Please give us your views.
Question 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
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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 Agree Neither agree nor disagree Disagree Strongly disagree Strongly disagree Guestion 9 To what extent do you agree or disagree that all of Scotland's plumbing should be made lead-free? Strongly agree Agree

Question 10 Would you know where to get information on how to ensure that your pipes are not affecting your drinking water?
Question 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☑ Agree
☐ Neither agree nor disagree
Disagree
☐ Strongly disagree
Question 12 What support do owners and users of private water supplies require to ensure the drinking water is safe? Please give us your views.
Those on private water supply require clear information regarding suitable domestic treatment systems and their maintenance. It should be made clear to those purchasing properties served by private water supplies that they need looking after carefully to produce consistent safe water.
Question 13 Do you have any further views on public and private drinking water supplies? Please give us your views.
The present private water supply grant should be increased to encourage users of failing supplies to seek more long-term solutions such as borehole drilling. It would be good to get a way to encourage groups of properties to work together to reduce overall costs per household.

	no do you think has a role in changing how we manage rainwater in Scotland to adapt the impacts of climate change? (Please select all that apply).
\boxtimes	Individuals
	Homeowners
\boxtimes	Businesses
\boxtimes	Scottish Government
\boxtimes	Scottish Water
\boxtimes	Local Authorities
\boxtimes	Scottish Environment Protection Agency (SEPA)
\boxtimes	Land owners
\boxtimes	Farmers
\boxtimes	House builders
\boxtimes	Community groups
	Other (please use the text box below)
1	ommunity Resilience Groups can also play an important role in helping their communities espond to flooding and the effects of climate change.
То	estion 15 what extent do you agree that you/your organisation have/has a role in changing how manage rainwater in communities to adapt to the impacts of climate change?
\boxtimes	Strongly agree
	Agree
	Neither agree nor disagree
	Disagree
П	Strongly disagree

What would you/your organisation be willing to do in your home/property to manage rainwater differently? For example, disconnect your down pipes from the sewer, have permeable driveways, install water butts and/or rain gardens.

For the development of our new build Council housing and Council housing refurbishment programmes we have recently developed a new Design Guide. This guide outlines best practice in developing suitable, affordable and energy efficient housing design. The Guide incorporates a range of recommended features which will ensure new build homes and refurbishment programmes meet the individual needs of each household, and are well connected to local services, jobs, and communities.

Within the Design Guide there are some elements in relation to the management of rainwater and that the drainage design is listed as having to reference the following guidance:

- Scottish Water guidelines
- PKC Flood Risk Supplementary Guidance
- PKC Open Space Provision for New developments

The Guide states that the sustainable drainage is to be integrated within site layouts, streets and gardens. Preference is to capture all volume above ground but if this is not achievable then a combination of below ground storage tanks and oversized pipes with above ground strategies will offer an acceptable solution. Drainage should ensure that flows directed away from homes with road surfaces kept lower than verges, footpaths and homes where possible.

Developments should incorporate landscape features to support sustainable drainage such as rain gardens and swales (shallow drainage channels). These can provide opportunities within communities by supporting growing spaces, providing pleasant green zones and spaces for children to play and learn.

In terms of driveways, we currently don't build any properties with driveways but instead provide communal parking areas; as the drainage is to be integrated at the time of the build, the capacity should be considered in the design at the time of the proposals being developed.

Question 17 Would you know where to find information on how to best manage rainwater in your property? ☑ Yes ☐ No Question 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 ☐ Agree

Neither agree nor disagree
Disagree
Strongly disagree
 estion 19 at should Scotland's drainage systems look like in the future?
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

Do you have any further views on how Scotland should manage rainwater in the future?

Please give us your views.

The recent policy framework developments around blue-green infrastructure enhanced the existing flood risk management approach but are unlikely to dramatically reduce surface water flood risk.

While blue-green infrastructure has its place and can play a limited role in future rainwater management, it will not provide solutions in built-up urban catchments at the highest risk of surface water flooding where little or no space is available. In such circumstances, all other potential solutions must continue to be pursued (surface water management planning, SUDS, Scottish water improvements in combined sewer infrastructure, etc). Grey infrastructure solutions will therefore remain necessary.

While the aspiration of separating surface water out of combined sewers is understood, the surface water and resulting flood risk still has to be managed.

There remain many barriers to the delivery of effective surface water flood management including:

- Limited funding:-
 - Surface water management schemes are often not economically viable and therefore do not attract capital grant funding; the Scottish Government should consider changes to existing legislation to address this.
 - Capital grant funding levels should be increased to meet the needs of the climate emergency.
 - At present Scottish Water are only funded to deal with internal property sewer flooding. They should be provided with funding to deal with internal and external property surface water flooding.
- The current regulatory/legislative framework around surface water flood risk management should be reviewed and strengthened, particularly with a view to placing greater duties on Scottish Water.
- A legal duty should be placed on Scottish Water to manage internal and external property flooding due to surface water, as well as internal sewer flooding.
- Sustainable Urban Drainage Systems:-
 - Legal duties should be placed on developers to provide well designed, natural SUDS. This should be back up by Changes to Sewers for Scotland.
 - Additional Regulations should be considered to improve the design, adoption and maintenance arrangements for SUDs.
- Landowners and farmers must act to reduce surface water runoff from private and agricultural land as this makes a significant contribution to flood risk, and the transport of significant volumes of sediment.

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

X	Yes
П	No

Question 22 To what extent do you agree or disagree that more disposed of down toilets or drains?	should l	oe don	e to sto	op items being
☐ Strongly agree				
X Agree				
☐ Neither agree nor disagree				
□ Disagree				
☐ Strongly disagree				
Question 23 How do you think we can change behaviours to average matter in the toilet/sewer (e.g. wet wipes, cotton but etc.)? Please give us your views.		-		
Education and communication regarding harm to consequences i.e. costs of remediation.	sewage	system	ns alon	g with
Question 24 It is already an offence for non-household propertie to the sewer. Do you agree that offences should be		_	fats, oi	ls and greases
Include other pollutants, and specifically plastic?	Х	Yes		No

Please give us your views.
This would be particularly hard to enforce i.e. tracing the perpetrator of the contamination would be very difficult and would likely be resource intensive.
This view extends to Questions 25 & 26 in that the source will be difficult to pinpoint without dedicated resourcing
Question 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
X Agree
☐ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree
Question 26
Do you agree that resource recovery is something that Scottish Water should be
undertaking?
X Yes
□ No
Question 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 material that might otherwise be sent to landfill.
☐ Strongly agree
X Agree
☐ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree

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?
X Yes
□ No
Question 29 What support do owners and users of private wastewater systems require to best protect the environment?
Please give us your views.
It is likely that owners of private wastewater systems are also on private water supplies therefore, the same connection difficulties will apply. For example, most properties would like to be connected to main supplies but are too far away from the sewage / water network.
Question 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?
☐ Strongly agree
X Agree
☐ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree
Question 31 Do you have any further views on public and private wastewater systems?

Please give us your views.
It is likely that owners of private wastewater systems are also on private water supplies therefore, the same connection difficulties will apply. For example, most properties would like to be connected to main supplies but are too far away from the sewage / water network.
Question 32 To what extent do you agree that changing our behaviours is essential to limit charge rises?
☐ Strongly agree
☐ Agree
X Neither agree nor disagree
☐ Disagree
☐ Strongly disagree
Question 33 Do you agree that we should recognise that there are three services (water, wastewater and drainage)?
X Yes
□ No
Question 34 Do you agree that using Council Tax Bands is the fairest way to charge for services used by households?
☐ Yes
X No

Other (please use the text box below).
Any charges should be linked to the demand on the systems, council bandings will only indicate how many rooms a property has other than the demand on sewage systems and mains water systems.
Question 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.
Education and communication regarding the use of water along with consequences i.e. costs of shortage.
Question 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.
Provide water butts for householders and advise on how to collect etc.
Consideration of how to incentivise keeping gardens green and turning into driveways/concrete areas which deter soak away of rainwater.
Question 37 To what extent do you agree that all households and businesses should pay for roads to be drained?
☐ Strongly agree
☐ Agree
☐ Neither agree nor disagree
X Disagree
☐ Strongly disagree
Please give us your views.
This would sound like a double charge to householders and businesses who will believe they already pay for this via the Council.