

Highland wide Local Development Plan - Main Issues Report Consultation Summary and Actions Sheet

Reference Number:	HWLPD-MIR-281
Organisation/Individual:	Scottish Water

Action:

Immediate Response Required	
Meeting required with Respondent	X
Issue for Area Local Development Plan	
Further Information Required	
Other (Please Specify)	

If no box ticked - issues raised will be dealt with in preparation of the Proposed Plan.

Issues Raised in Response:

Purpose of Main Issues Report	
NPF2 for Scotland	
Vision for the Highlands	
Inverness and A96	X
The A96 Corridor	X
Phasing of Development	
Developer Contributions	X
East Inverness	X
Nairn	X
Tornagrain	
Smaller Settlements in A96	
Caithness and North Sutherland	
Easter Ross and Nigg	
Development of Local Centres	
Wider Countryside and Fragile Areas	
Population and Housing	
Housing in the Countryside	X
Affordable Housing	
Planning for an Ageing Population	
Gypsies/Travellers	X
Retailing	
Developer Contributions	
Natural, Built and Cultural Heritage	

Previously used Land	X
Wild Land	
Water Environment	X
Renewable Energy	
Flooding	X
Waste Management	
Air Quality	
Sustainable Design	X
Business and Industrial Land	X
Accessibility and Transport	
Agricultural Land	
Subdivision of Existing Crofts	
Allocation of Inbye Land	
New Crofting Township	
Small Scale New Crofts	
Coastal Development	
Forestry and Woodland	
Minerals	X
Open Space and Physical Activity	
Access to the Outdoors	
Comments on Consultation Process (+ve)	
Comments on Consultation Process (-ve)	

Key:

Background	Spatial Strategy	Policy Options	Consultation
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Notes:

- Continue to focus development towards areas where capacity exists in Scottish Water's Part 3 and Part 4 Assets
- If dispersed growth option is brought forward for proposed plan Scottish Water would not fund the infrastructure studies
- Suitable waste facilities should be incorporated into plans for gypsy/traveller sites
- Complex nature of flooding means continued partnership working is essential
- Keen to explore effectiveness of sustainable technologies with Highland Council
- EIA for minerals developments should be submitted to Scottish Water for Comment

Action Sheet Completed by:	SH
Date:	15/12/09

Dawn Sutherland

From: Will Paton [REDACTED]
Sent: 09 November 2009 17:04
To: devplans
Subject: Highland MIR Response

Please find attached, Scottish Water's response to the recent Highland Wide MIR Report.

Kind regards

Will Paton | Development Planner | Asset Strategy
Providing The Vision For Sustainable Assets
Scottish Water | 419 Balmore Road | Glasgow | G22 6NU
[REDACTED]

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11/11/2009



05 November 2009

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Dear Mr Black

Highland Wide Local Development Plan Main Issues Report : Questionnaire

Scottish Water would like to thank Highland Council for providing an opportunity to respond to the Highland Wide Local Development Plan Main Issues Report. We broadly welcome the proposed approaches outlined within the document and we will continue to work closely with Highland Council to help deliver its development vision wherever possible in line with our funding structure and the framework placed upon us by the Scottish Government and our regulators.

Whilst the issues covered within the questionnaire are varied and act as a trigger point for general debate, and to shape the subsequent stages of the process, Scottish Water can only legitimately comment upon the issues which fall within our remit. Therefore, in instances whereby the question relates to matters outwith our influence, these have been left blank for the purposes of the response.

The following questions do however merit further comment in so far as it may be useful to clarify Scottish Water's position on the proposed approaches in line with any operational, legal, financial or regulatory obligations incumbent upon us.

Q1. Spatial Strategy: Inverness (Agree - Preferred Option)

Scottish Water (SW) continues to work closely with Highland Council (HC) in order to support and enable growth within the Highlands, through the delivery of appropriate treatment capacity and infrastructure by attempting, wherever possible, to align our investment programme with development programmes. Similarly, by identifying where capacity already exists within our Part 4 and Part 3 assets (see Fig 1 overleaf) and encouraging developers to focus on these areas whilst we invest in areas requiring urgent remediation, encourages development and sustainability and is in keeping with HC's vision.

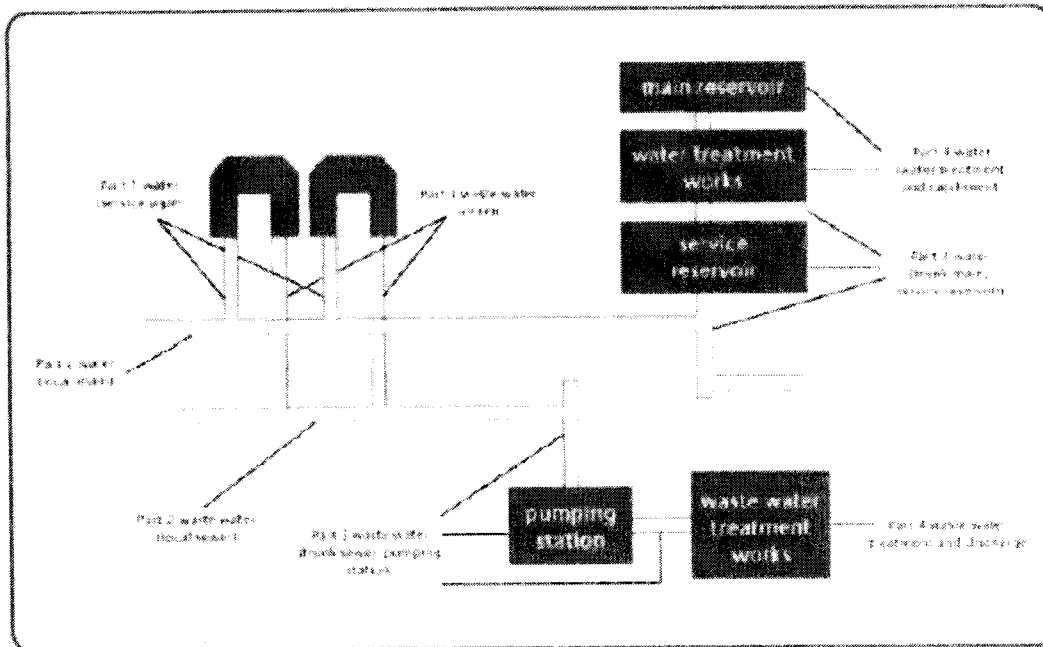


Figure 1: Water and waste water assets: pictorial representation of parts 1 to 4 assets

- | | |
|--|---|
| <p>Part 1: The connection from individual premises to a water main or sewer.</p> <p>Part 2: The water mains and sewers that connect developments e.g. a street of houses to trunk mains and trunk sewers and some sustainable urban drainage systems (SUDS).</p> | <p>Part 3: The local bulk infrastructure, such as trunk mains and trunk sewers, water service reservoirs, waste water pumping systems and some SUDS systems.</p> <p>Part 4: The strategic assets such as raw water intakes, water impounding reservoirs, water pumping stations and aqueducts, and water and waste water treatment works.</p> |
|--|---|

Q2. Spatial Strategy: A96 Corridor (Agree - Preferred Option)

SW has been heavily involved in the A96 Corridor framework and continues to work closely with HC and developers in planning the delivery of what is a key development not just for the Highlands but Scotland in general. Substantial investment in both capital and operational terms has been committed to support development on a technical level before commencement of actual investment in infrastructure.

If the alternative approaches detailed within the document were to be adopted and the investment area broadened, any infrastructure studies could not be funded by SW.

Q3. Developer Contributions in the A96 Corridor (Agree - Preferred Option)

SW recognises that delivery of the A96 Corridor is challenging not only in terms of cost but also in terms of complexity. In discussions with HC, developers and third party agents such as The Princes Trust, it is clear that a joined up approach is essential for the success of the project and consequentially, a natural progression of such a joined up approach would be the incorporation of a regulatory framework for the collection and allocation of developer contributions.

The mechanisms for achieving this are varied and whilst SW does not have any specific preference, we are willing to discuss with all parties, any proposals for the delivery of infrastructure and funding protocols. However any such proposals will need to be compatible with our current funding regulations.

It should also be noted that SW's 'Reasonable Cost Contribution' for developers does not constitute part of these contributions and normal arrangements will still be applicable for all A96 Corridor development.

Q4. East Inverness in the A96 Corridor (Agree - Preferred Option)

SW is currently engaged with HC and key developers to discuss the available options to enable delivery of their individual projects in parallel to other developments within the entire A96 strategy.

Q5. Nairn in the A96 Corridor (Agree - Preferred Option)

SW is currently engaged with HC and key developers to discuss the available options to enable delivery of their individual projects in parallel to other developments within the entire A96 strategy.

Q16. Needs of Gypsies/ Travellers (General Information)

An aspect relating to all forms of caravan and motor home activity which SW would like to draw attention to is that of dealing with the disposal of waste from chemical toilets. Similarly the disposal of such waste in road drains has a serious impact on the water environment and likewise their disposal in public toilets connected to a public septic tank can interfere and seriously degrade the biological processes at work. It is important to note that such disposal is prohibited.

When considering developments for the servicing of travellers, it is important that suitable waste facilities are incorporated within the plans.

Q20. Previously Used Land (General Advice)

Guidance for the construction of water mains in previously used land is contained within Water for Scotland 2nd Edition (2.2.2 Ground Condition Assessment) and should be consulted in all instances.

Q13. Housing in the Countryside (Agree - Preferred Option)

It is often the case that more rural areas of Scotland are not served by public water or waste water services. SW would ask that any individuals or developers considering housing developments within the countryside should make early contact in order to establish if public water and waste water treatment is available.

Due to the vast distances involved in some instances and substantial costs involved in delivering such services, it is unlikely that SW would be in a position to provide these and alternative arrangements would be required. In such instances advice can be sought from the Environmental Health Department within HC relating to private supplies of water and the Scottish Environment Protection Agency (SEPA) with regards to septic tanks and similar private waste water treatment systems.

Q22. Water Environment (Agree - Preferred Option)

The most prominent piece of legislation affecting SW in terms of the management of water resources is the Water Framework Directive (WFD). The water resources available to SW are vast and our responsibility for these valuable resources cannot be underestimated. Scotland's water supplies are initially sourced from some of the largest water bodies in Scotland as well as smaller lochs and streams and it is vitally important to protect these.

SW supports the principle of maintaining strong partnerships between all parties involved in the protection and monitoring of the water environment and we are a member of the Area Advisory Groups for River Basin Planning.

Q24. Flooding (Agree - Preferred Option)

SW supports the principle of Sustainable Urban Drainage Systems (SUDS) and encourages all developers to incorporate such systems wherever possible within their designs. This offers the opportunity to locally control surface water run-off rates and reduce the loading on public sewerage systems whilst maximising the capacity for foul flows and reducing the risk of surcharging and sewer flooding.

SW is working with key partners to reduce the impact of flooding. The responsibilities surrounding flooding are varied, and at present a number of agencies have responsibility for dealing with different aspects of flooding in Scotland.

Conventional urban drainage systems are made up of a complex network of sewer pipes, overflows, gullies, burns and culverts (covered watercourses). Ownership and duties are split between various agencies and landowners.

SW has the public drainage duty and is responsible for the drainage of rainwater run-off from roofs and any paved ground surface within the property boundary. Scottish Water also protects homes from flooding caused by sewers either surcharging or becoming restricted due to chokes or collapses.

The complex nature of flooding – with many agencies responsible for different aspects of sewer and drainage systems in communities – means that a partnership approach is needed to tackle this serious problem.

SW has worked in partnership with the Scottish Government, SEPA and Local Authorities on the new Flood Risk Management Bill which will reduce overall flood risk and improve how Scotland deals with all types of flooding in the future.

Q27. Sustainable Design (Agree - Preferred Option)

Scottish Water has a statutory duty to contribute to the achievement of sustainable development in carrying out our operations.

Although we can directly influence several aspects of sustainable development through our functions, for the most part, we will work in partnership with other organisations which have relevant expertise. In particular, we are working with developers, local authorities, enterprise companies and regulators to ensure that sustainable economic development is delivered effectively for Scotland.

SW is working with the Scottish Government and our regulators to ensure our carbon footprint can be significantly reduced while still delivering our core customer and environmental obligations.

Similarly we would encourage all relevant parties, when planning their developments, to have an awareness of the environmental impact their water and drainage proposals may have with particular focus on efficiency (such as pumping vs gravity supply)

SW welcomes the incorporation of 'grey water' harvesting in some of HC's public buildings and this is most notable in Acharacle Primary School, where a number of sustainability initiatives have come together to produce Scotland's first wholly sustainable school.

As an organisation, SW is always keen to develop new and innovative technologies in order to deliver efficient and effective services. One such technology is grey water and rainwater harvesting. This approach is commonplace in parts of Europe, particularly Scandinavia, and such technology is being investigated by SW as a possible means to augment and supply water, for various uses, particularly within more rural areas of Scotland.

Whilst such technology has greatly advanced in recent years, it is not widely used within the UK and SW is keen to explore the effectiveness and suitability of such measures with Highland Council.

Q36. Minerals (Agree - Preferred Option)

The collection of minerals often involves mining activities which can include the use of explosives and blasting procedures. Where the development of new mineral sites and the reuse of previous sites are to be pursued, SW would ask that an Environmental Impact Assessment (EIA) be carried out and submitted to SW for review. We are particularly concerned that any mining activities do not result in deterioration of waters used for public water supply and these may be both surface and groundwaters.

In our formal response to the EIA we shall include a list of precautionary measures required to protect any assets within the vicinity of the mining works and any watercourses and groundwater which may directly or indirectly be used for abstraction for public supplies. Full compliance with these measures is essential for the protection of our assets and public health.

As part of the HC vision is to encourage new business Highland wide, we would take this opportunity to remind developers and businesses that due to the introduction of the Water Services (Scotland) Act 2005, the water industry in Scotland has opened up to market competition for non-domestic customers. Since 1st April 2008, non-domestic users have been able to choose from a range of suppliers (Licensed Providers).

Non-domestic customers require a Licensed Provider to act on their behalf for all aspects of new connections and the supply of their water and waste water services. Further details can be found at www.scotlandontap.gov.uk.

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I trust that the above information is useful and should you require further clarification on any point, please do not hesitate to contact me.

Yours sincerely



Will Paton
Development Planner
Scottish Water - Asset Strategy