

CAIRNGORMS NATIONAL PARK AUTHORITY

Title: CONSULTATION RESPONSE TO CONNECTING TO THE SYSTEM – CONSULTATION ON PAYING FOR CONNECTIONS TO THE WATER AND SEWERAGE WORKS AUGUST 2005 Paper 2005/19

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Purpose

The aim of this document is to seek the Board's approval on the proposed response to the consultation on Connecting to the System – Consultation on Paying for Connections to the Water and Sewerage Works.

Recommendations

That the Board:

- Approves the paper and it will then be forwarded to the Scottish Executive before the 17th November 05.

Executive Summary

The consultation document is summarised with the following points that;

1. The local infrastructure costs per house that the developer has to bear should not be higher in rural areas than those in urban locations.
2. Conservation or low usage of water is to be encouraged.
3. Non domestic users should be metered as a first step.
4. A clear method of paying back funds to smaller developers is encouraged, so they are not disadvantaged.
5. Capacity should be reserved for affordable housing up to 3 years.
6. For a more planned approach, waste water treatment plants should be developed to allow for easy expansion in the future.

The following is the Cairngorms National Park's response to the questions asked in the Consultation Document:

Question 1: Do you agree that Scottish Water's contribution should be targeted at all local infrastructure ('Part 2' and 'Part 3'), with developers funding immediate connections and Scottish Water funding strategic capacity?

If not what approach would you support, and why?

In general the CNPA agrees with this however as our response to 'Investing in Water Services 2006-2014: The Quality & Standards III' consultation stated that 'The Park believes that geographically uniform charging mechanisms should be maintained in order that higher charges are not introduced into rural areas, thereby rendering further development of those communities non-viable'. This view still stands. The CNPA does not want costs in some rural locations to be substantially higher than in urban locations. There is a need for effective cross subsidisation in order to harmonise charges. If the charges are identical across Scotland then this would be acceptable.

Question 2: Should the Regulations define Scottish Water's contribution towards (a) domestic properties only, or (b) domestic and non-domestic properties?

The Regulations should define Scottish Water's contribution towards (b) domestic and non-domestic properties as everyone uses water for some purpose. Developers need clarity on what Scottish Water's contribution will be to non-domestic as well as to domestic properties.

Question 3: If the Regulations were to define reasonable cost for non-domestic properties, what method do you suggest should be used?

One of the National Park's aims is to promote the sustainable use of the natural resources of the area, the proposals would benefit from a strong and clearly defined strategy to promote wise-use and water conservation/efficiency measures for both households and businesses.

Some non-domestic properties may use more water than others; therefore all non-domestic properties should be metered as a first step. Water conservation or low usage should be rewarded with lower charges.

A base formula could be developed (as suggested) looking at various indicators perhaps looking at:

- Size of property
- Surface area
- Amount of water used

The CNPA would ask that Scottish Water consider a combination of 2 elements to the connection charge of one based on use of water and one based on recycling to encourage a sustainable approach.

Question 4: Do you agree that Scottish Water's contribution should be limited to an amount based on future income from that connection and payable only when a development is well advanced?

If Scottish Water's contribution is purely based on future income, then this is a disincentive to developers incorporating water saving measures in the initial design.

Question 5: Do you have any comments on the proposed basis for calculating Scottish Water's reasonable cost contribution?

The proposed basis for calculating Scottish Water's reasonable cost contribution is generally acceptable; other than the fact that there is no incentive for any water conservation or lower water usage. Could there be a factor introduced which encourage this ie a deduction from the fee for lower water usage.

Question 6: What factors should be taken into account in setting the variables n and c , and why?

The CNPA agrees with the methodology suggested.

Question 7: Do you agree that connections for new properties and existing properties should be treated equally? If not, what approach would you support, and why?

The CNPA agrees that connections for new properties and existing properties should be treated equally.

Question 8: Do you have any comments on the implications of the draft Regulations on development constraints?

The CNPA welcomes Scottish Water's change in policy, which allows provision to be made to Communities Scotland to cover the impact of this policy on affordable housing developments.

The CNPA's response to Point 9 in the 'Investing in Water Services 2006-2014: The Quality & Standards III' consultation was that 'Investing in the high upfront infrastructure costs can be a disincentive to housing providers building both public and private houses for rent and sale.' It was suggested that the public sector fund the infrastructure and claw-back these costs over a reasonable period of time as development takes place; this view still stands.

In the Cairngorms National Park this will allow the small developer to pay on a per house basis rather than the unfair alternative of paying everything up front. The ability to expand the sewerage facilities should be built into thinking along with the long term environmental issues. The ad hoc short termism system of the past should be stopped as such an approach would prevent first-time sewerage schemes leading to serious impact upon the rural communities.

The consultation still puts the onus on the developer and in some cases this is not helpful. It is suggested that some other method could be found such as the one outlined above. There have also been problems in the past with delays in Scottish Water reimbursing projects, for instance, for Housing Associations, where they have been out of pocket for some considerable time. In some instances Scottish Homes/Communities Scotland front funded the water and sewerage to allow the project to proceed and have not been reimbursed to allow monies to be paid back to Communities Scotland.

Question 9: What, if any, provision on reserving capacity would you support and why?

The CNPA would support reserving capacity as it is essential if, for instance, affordable housing is approved through Section 75 that this is built. Currently a new wastewater treatment plant was approved and is being built in Nethy Bridge. This has been built with additional capacity to include all projects with planning approval. However, if new projects come on site and are given planning permission and are built prior to the previously approved projects then Scottish Water will refuse connection to the supply. It is imperative that some mechanism is put in place to reserve capacity for affordable housing.

The suggestion of reserving capacity for one year is unrealistic and 3 years would be more acceptable.

To assist in alleviating this problem, the CNPA would suggest that sufficient space is planned into any new sewage works development to allow expansion of the system by the addition of further treatment opportunities in the future. This would allow the issue of reserve capacity to be addressed without tying up current budgets and allow for a more planned approach to future developments rather than a degree of speculation.

I trust that you will find the views of the Cairngorms National Park of interest.