

Scottish Executive Consultation – Connecting to the System
Consultation on Paying for Connections to the Water and Sewerage
Networks

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?*

Response: Yes, however an allowance should be given for the individual private house builder in the calculation compared to the large volume house builder.

The regulations state that an investment objective for Scottish Water is to meet the strategic infrastructure requirements of all new development during the period 2006-2014. As this includes the creation of sufficient capacity at waste water treatment works and service reservoirs it is to be welcomed.

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

Response: As the one of the main aims of the consultation document is to bring clarity to the process, provide certainty to developers regarding their responsibilities for providing infrastructure and the contribution Scottish Water will make. The regulations should define Scottish Water's contribution for both domestic and non-domestic developments.

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

Response: The calculation should make an allowance that relates to water useage and waste water volume.

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 not, what approach would you support, and why?*

Response: Yes

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

Response: The reasonable cost criteria does not make any allowance for developments in the rural area which tend to be very small scale. In Dumfries and Galloway many of the housing sites are small scale in nature (less than 5 sites) which makes them uneconomical to development.

The reasonable cost criteria does not distinguish between a single developer or a large developer. A large developer is likely to have an economy of scale they can factor into their contribution.

Provision is to be made to Communities Scotland to cover the impact the regulations may have on the provision of affordable housing. There is a lack of clarity in the consultation on how this would be achieved and until this is known the Council will be unable to assess whether the costs of infrastructure will adversely impact on the money available for new housing.

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

Response: Variable n (number of years). This variable should cover a reasonable number of years, for example 15 to 20 years.
Variable c (cost of borrowing money to provide the contribution at the outset).

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?*

Response: First time sewerage connection costs for existing properties should be funded by Scottish Water, as the full environmental benefits of such schemes only arise if all properties connect. However, charges for water supply connection for new properties and existing properties should be treated equally and paid for by Scottish Water.

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

Response: The extra money being provided to Scottish Water to meet the strategic capacity requirements (part 4 infrastructure) of all anticipated new developments is to be welcomed. The Council also welcomes the requirement being placed on Scottish Water to improve the quality of the data that it holds. Dumfries and Galloway Council have built up a good working relationship with local officers in both SEPA and Scottish Water. The emphasis placed in the consultation for the need to build on these meetings can only improve the situation.

There is a concern that local authorities developments are to be prioritised within the context of the National Planning Framework. Dumfries and Galloway has only limited mention in the Framework.

The consultation acknowledges that development constraints could still be caused by problems with part 2 or 3 of the local infrastructure which would be subject to the reasonable cost criteria. In Dumfries and Galloway many of the housing sites are small scale in nature and make the uneconomical to develop. The reasonable cost calculation should make an allowance for developments in the rural area.

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

Response: The opportunity for developers to reserve capacity they have paid up front for is to be welcomed. However, in Dumfries and Galloway, which is a

APPENDIX 1

rural area with low completion rates many developers would require a longer time period than the 1 year proposed in the consultation document.