Scottish Water consultation on “Shaping the future of your water and waste water services: Draft Strategic Projections”

RSPB Scotland response

RSPB Scotland is part of the RSPB, which speaks out for birds and wildlife, tackles the problems that threaten our environment and promotes the conservation of wild birds and their habitats. We are supported by nearly 90,000 members in Scotland, with a strong membership base in rural areas as well as in towns and cities. We have practical experience of managing terrestrial, aquatic and coastal habitats for conservation, farming, forestry and other enterprises, and of providing advice to land managers. RSPB Scotland manages more than 68,000 hectares of land, much in management agreements with local farmers, crofters and graziers. Our land management interests cover a wide range of habitats and geographic areas within Scotland. We undertake biological and economic research to underpin our policy analysis and advocacy. We also have experience of environmental education and training for all ages. The RSPB is the BirdLife International partner in the UK.

RSPB Scotland welcomes the opportunity to express views on the draft strategic projections for Scottish Water’s long term strategy for the provision of water and waste water services. We have set out our comments below on each section of the document.

Providing continuous high quality drinking water

RSPB Scotland welcomes the recognition of climate change as a key challenge for Scotland’s water industry and the acknowledgement that Scottish Water needs to adapt its assets and operations accordingly. Indeed, it is vital that Scottish Water takes steps to adapt to the impacts of climate change, as is consistent with their public body duties under the Climate Change (Scotland) Act 2009 to reduce greenhouse gas emissions and contribute to climate change adaptation in the most sustainable way. We recommend that Scottish Water uses Scottish Environment LINK’s principles for climate change adaptation, which involve working with nature and using an ecosystems approach to build resilience and protect and safeguard natural resources.

We are pleased that water use efficiency and leakage reduction have been highlighted as areas needing action. Reducing consumption and wastage of water not only alleviates pressure on valuable freshwater resources but also reduces carbon emissions associated with the abstraction, pumping, treatment and heating of water. The importance of reducing water use was emphasised by the Institution of Civil Engineers in its Water 2012 report, where it called on UK governments to drive changes to reduce domestic per capita water consumption by 30%. Therefore, it is positive that water efficiency is included in the draft strategic projections and that Scottish Water is exploring techniques for water efficiency in homes, for example, through grey water recycling. Scottish Water, and its regulators, must be proactive and take meaningful steps to ensure that water use is significantly reduced in the next investment period.

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1 The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654
Protecting and enhancing the environment

The draft projections recognise that we rely on a healthy environment to provide water services and that we must use resources sustainably. The document also indicates that Scottish Water customers consider leakage, pollution, bathing water quality, discolouration and carbon emissions as medium or high priority issues. Therefore, Scottish Water’s work to resolve these problems is not only in keeping with their statutory requirements but also reflects what customers would wish them to do. **RSPB Scotland welcomes the acknowledgement that Scottish Water will do more to protect and enhance the environment and to work closely with others to achieve this.** As a nature conservation charity with expertise in species and habitats conservation, we would be delighted to work closely with Scottish Water on this. We work across Scotland and have considerable skills and expertise in areas such as biodiversity surveying and monitoring, practical land management, advice provision and education.

RSPB Scotland strongly supports the ‘sustainable land management’ approach, which can protect and improve raw water quality while reducing costs at the water treatment works. This approach can also deliver a multitude of other benefits such as biodiversity, carbon storage, climate change adaptation and flood risk management thus helping Scottish Water to meet its existing statutory duties in respect of, for example, the conservation of biodiversity\(^2\) and climate change adaptation\(^3\). **We urge that Scottish Water’s work on sustainable land management develops over the coming years and is integrated into its core business in the next investment period.** It is notable that the sustainable catchment management approach is also gaining support from engineers. In its Water 2012 report, the Institution of Civil Engineers highlighted the benefits of catchment-based management and said that “UK administrators and regulators must support and provide resources to those willing to facilitate the catchment-based approach”.

Furthermore, the Scottish Government acknowledged the potential economic benefits of catchment management in its explanatory notes to the Water Resources (Scotland) Bill: “implementation of best practice to protect drinking water sources can reduce operational expenditure as a result of lower levels of treatment being required and can save the need for capital expenditure when additional treatment steps can be avoided”.

Scottish Water estimated that in one large drinking water catchment, implementing best practice could save upwards of £10m over a 25 year period. The potential for cost savings is also indicated by the continued investment in this approach by other UK water companies. The United Utilities SCaMP initiative began in 2005 when £10.6m was invested over a 5 year period, and a further £11.6m was invested in the 2010-2015 period. Ofwat approved £9.1m investment into South West Water’s Upstream Thinking programme for 2010-2015 and Northern Ireland Water has initiated a sustainable catchment management programme. It is important that these approaches are fully appraised so that the economics can be better understood; both in terms of savings on operational and capital expenditure, and the indirect economic benefits that sustainable catchment management can bring through flood risk management, protected area management and carbon storage. **RSPB Scotland believes that a review of evidence should be carried out to address questions surrounding the economics of catchment management.** This review must be done as soon as possible so that the results can be used to inform and influence this Q&S process.

\(^2\) Nature Conservation (Scotland) Act 2004
\(^3\) Climate Change (Scotland) Act 2009
RSPB Scotland agrees that it is positive that surface water run-off is being reduced from new developments through the use of sustainable drainage systems (SuDS). **However, it is important that SuDS are designed and managed to deliver optimum benefits for biodiversity.** RSPB and WWT have produced a [SuDS guidance handbook](#) that provides useful information on how to maximise benefits for people and wildlife and we urge Scottish Water to use and promote this guidance. Furthermore, we welcome the intention for Scottish Water to conduct pilots to explore the potential for retrofitting surface water management systems and again stress that any retrofit schemes should incorporate features that enhance habitat and amenity value.

**Supporting Scotland’s economy and communities**

RSPB Scotland is extremely supportive of Scottish Water’s intention to develop renewable energy. We fully recognise the contribution that renewables make towards mitigating climate change and meeting Scotland’s ambitious carbon emission reduction targets. However, it is essential that developments are appropriately sited and managed to minimise adverse environmental impacts. The development and management of renewables must not only conform to legislative requirements including the Birds and Habitats Directives and Water Framework Directive, but should seek to minimise any negative impacts on important wildlife sites that fall outside of the protected areas network. **We would like Scottish Water to engage stakeholders, including RSPB Scotland, at an early stage to help avoid negative environmental impacts.** The RSPB’s [Scotland’s Renewable Future](#) document outlines a number of cases where we have worked with developers from an early stage to minimise impacts on sensitive species and habitats.

**Investing in future water services**

RSPB Scotland agrees that Scottish Water should work to improve services in relation to encouraging water efficiency and reducing discolouration of tap water. As we stated above, greater water use efficiency would reduce abstraction pressure on freshwater habitats while also lowering associated carbon emissions and financial costs. We are keen to see sustainable land management used to reduce water discolouration in drinking water catchments. The [IUCN UK Commission of Inquiry on Peatlands](#) highlighted the benefits of peatland restoration for reducing the levels of dissolved organic carbon in watercourses and bringing economic benefits for water companies. Scottish Water could secure considerable sustainable catchment management objectives by providing support to peatland land managers to undertake restoration. The IUCN project might be a useful means to co-ordinate such activity.

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Registered Charity England and Wales Number 207076, Scotland Number SC037654
RSPB Scotland is part of the Royal Society for the Protection of Birds, the UK-wide charity which speaks out for birds and wildlife, tackling the problems that threaten our environment.

Nature is amazing - help us keep it that way.