



17th October 2014

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Dear Steve,

West Lothian Local Development Plan Main issues Report: Questionnaire.

Scottish Water would like to thank West Lothian Council for providing an opportunity to respond to the West Lothian Local Development Plan Main Issues Report. We welcome the proposed approaches outlined within the document and we will continue to work closely with West Lothian Council in our role as a Key Agency within the Scottish Planning system. We will help deliver sustainable development within the West Lothian area wherever possible in line with our remit and operating within the funding structure and the framework put in place by the Scottish Government and our regulators.

Scottish Water actively encourages early engagement between it and other key stakeholders within the planning and construction process, which can help avoid undue delays and allow us to plan our investment programmes where appropriate.

The following paragraphs provide specific comments on sections of the MIR most relevant to Scottish Water and responses have primarily focussed on those areas.

Main Issue 3: (Para 3.35-3.63)

The Council has made reference to the allocation of an additional 3,500 houses above the base level of housing supply to the period 2024. Scottish Water is committed to enabling development within Scotland and will continue to work with Local Authorities to highlight where there is available capacity within Scottish Water's network. This allows development to occur in areas where the need to upgrade existing infrastructure is minimal, therefore reducing developer costs. Similarly early dialog between developers and Scottish Water over this extended planning period will ensure timely and cost efficient investment can be put in place.

Main Issue 3: (Para 3.79)

Scottish Water has put in place significant investment over the last two investment periods, to enable development across Scotland. Whilst we acknowledge that capacity issues still remain in some areas, these are not insurmountable issues and can be addressed through our investment programme.

In instances whereby network limitations may be evidenced by additional loading of new developments to the system, developers are required to fund and mitigate any reinforcements. However, developers will receive a Reasonable Cost Contribution¹ from Scottish Water towards this reinforcement and where applicable, infrastructure funding may also be available in some instances.

We also appreciate that in some areas the reinforcement required may be significant but we have been able to work with Local Authorities, developers and consortiums of developers in the past to overcome these issues to allow development to progress.

Floor Risk Management

Scottish Water 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 runoff rates and reduces the loading on public sewerage systems whilst maximising the capacity for foul flows and reducing the risk of surcharging and sewer flooding.

Scottish Water 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.

Scottish Water 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.

¹ The Provision of Water and Sewerage Services (Reasonable Cost) (Scotland) Regulations 2006.

Scottish Water is currently in discussions with fellow key agencies and local authorities with regards to 'Integrated Catchment Study Areas, to tackle flooding issues. Within West Lothian, the particular area of focus is that of Linlithgow.

General Textual Amendments

Scottish Water would like the following statements to have some revised wording to be incorporated:

Linlithgow & Linlithgow Bridge

Infrastructure Considerations:

Water Supply: there are no known constraints in terms of waste water treatment and water supply.

We would ask that the word 'constraints' be revised to that of 'issues'.

We have made the following comments;

The water treatment works and waste water treatment works currently has sufficient capacity to service known levels of development. The settlement of Linlithgow has historically been serviced by a combined sewer network which has experienced a number of drainage issues due to the amount of surface water entering the network, reducing its hydraulic capacity.

It is essential therefore that for all new development, separate systems should be utilised for on-site drainage layouts, with surface water being dealt with at source or nearby via a suitable SUDS system.

Livingston

Infrastructure Considerations:

Water Supply and Treatment: There are capacity issues at the Livingston Waste Water Treatment works in North West Livingston. Any requirements to upgrade/expand the works will be informed by an on-going study of the River Almond catchment being undertaken by SEPA and Scottish Water. In the interim, constraints at the Livingston treatment works limit development opportunities in the area unless on site mitigation can be achieved. The town is also served by the East Calder Waste Water Treatment Works where further investment may be required.

We would ask that the word 'constraints' be revised to that of 'issues'.

We have made the following comments:

There is currently limited capacity at Livingston WWTW.

Whilst Scottish Water is funded to increase capacity at our treatment works to enable development and will work with West Lothian Council and Developers to

provide this capacity in line with their investment programme, the River Almond is also subject to specific environmental factors out with those of our investment, which impacts on the ability of the receiving water itself to accommodate additional discharges from any additional development demands.

Currently Scottish Water are working closely with our Regulators SEPA to undertake studies on the River Almond catchment, the results of which will be a fundamental consideration on how best to provide an overall solution and additional provide capacity for development. Once the results of these studies are complete and have informed our investment programme, Scottish Water will provide updates to the Council as these milestones are achieved. Scottish Water also works closely with the PFI company to enable development within the West Lothian area.

Mid Calder

Infrastructure Considerations:

The village is served by the East Water Waste Water Treatment Works (WWTW), where there are no known current restrictions on development.

We would ask that a correction be made to read 'East Calder' in substitution for 'East Water'. Also you state that there is no known current restriction on development served by East Calder WWTW, in which the works has limited capacity. Can you please change the sentence to read the following: There is currently limited capacity at East Calder WWTW, Scottish Water are funded to increase capacity to enable development and will work with West Lothian Council and Developers to provide this capacity in line with their investment programme.

Polbeth

Infrastructure Considerations:

There is insufficient capacity at Pateshill Waste Water Treatment Plant and generally no development capacity.

Please revise the sentence to the following: 'at East Calder Waste Water Treatment Works'. As Pateshill is a Water Treatment Works.

As previously commented on in Mid Calder Section: There is currently limited capacity at East Calder WWTW, Scottish Water are funded to increase capacity to enable development and will work with West Lothian Council and Developers to provide this capacity in line with their investment programme

Pumpherston

Infrastructure Considerations:

Pumpherston is served by the East Water Waste Water Treatment Works (WWTW).

Please revise the sentence to the following: 'at *East Calder Waste Water Treatment Works*' as

As previously commented on in the Polbeth section: There is currently limited capacity at East Calder WWTW, Scottish Water are funded to increase capacity to enable development and will work with West Lothian Council and Developers to provide this capacity in line with their investment programme.

Stoneyburn/Bents

Infrastructure Considerations:

There is insufficient capacity at the Pateshill Waste Water Treatment Plant and generally no development capacity unless a new water main is provided and sewerage capacity is increased.

Please revise the sentence to the following: There is currently limited capacity at East Calder Waste Water Treatment works, Scottish Water are funded to increase capacity to enable development and will work with West Lothian Council and Developers to provide this capacity in line with their investment programme. In addition there is an issue with the capacity of the water network and a new water main will be required, early dialogue with Scottish Water is recommended.

Pateshill is a Water Treatment Works.

Threemiletown

Infrastructure Considerations:

There is insufficient capacity at Pateshill Waste Water Treatment Plant and generally no development capacity.

Please revise the sentence to 'at *East Calder Waste Water Treatment Works*' as Pateshill is a Water Treatment Works.

Can you also please change the sentence to read the following: There is currently limited capacity at East Calder Waste Water Treatment works Scottish Water are funded to increase capacity to enable development and will work with West Lothian Council and Developers to provide this capacity in line with their investment programme.

Scottish Water Investment for Additional Strategic Capacity

In previous communications Scottish Water has indicated, where there is insufficient capacity, this should not be seen as a barrier to development. Scottish Water is able to provide increased strategic capacity once the developer is able to provide evidence of meeting 5 distinct criteria. These criteria are:

1. Confirmation of land ownership
2. Confirmation that the development is supported in the Local Plan or has full planning permission
3. Confirmation of time remaining on current planning permission
4. Confirmation that plans are in place and agreed with Scottish Water to mitigate any local network constraints that would arise as a result of the proposed development
5. Notice of the developers reasonable proposals in terms of annual build rate.

On receipt of confirmation of meeting all of these criteria, Scottish Water will progress to the design and delivery of the necessary strategic infrastructure to support new development. We will work with developers to try and ensure the delivery of investment to dove-tail with commencement of development. Developers should be aware of this rule set and be encouraged to engage with us at their earliest opportunity. It should be noted that where new development necessitates infrastructure developers will be required to fund this. Scottish Water is funded to provide new capacity at our strategic 'part 4' assets (water and waste water treatment works) however all other infrastructures (parts 1 to 3 see figure 1 below) are the responsibility of the relevant developer to provide.

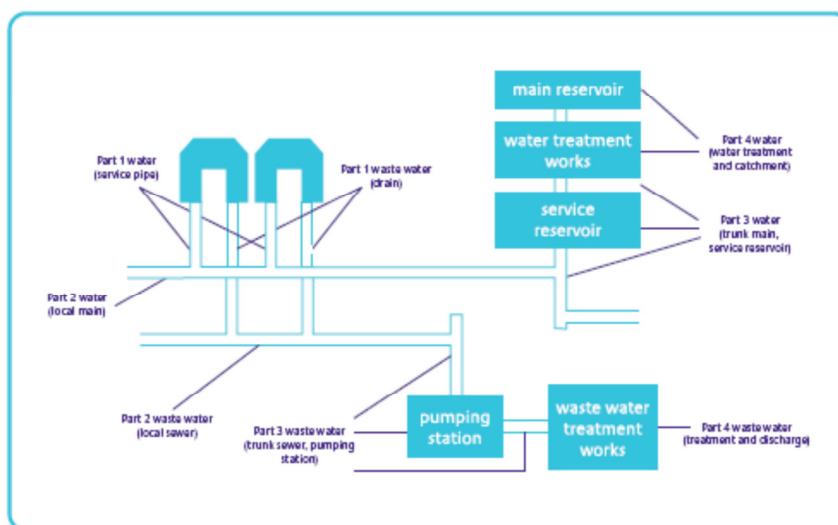


Figure 1: Water and Waste Water Assets: Pictorial Representation of Parts 1 to 4 Assets

I trust the above is acceptable but if you wish to discuss further, please do not hesitate to contact me.

Yours sincerely

Karen Bacon
Development Planner
Scottish Water