

Email to: waterpolicy@sepa.org.uk

Sewered Areas Consultation Response
Water Policy Unit
SEPA Corporate Office
Erskine Court
Castle Business Park
Stirling
FK9 4TR

22 February 2006

Dear Mr Bayes

SEPA Policy on Provision of Wastewater Drainage in Sewered Areas

The Royal Town Planning Institute (RTPI) welcomes the opportunity to comment on this proposed policy, which has substantial implications for local plans and development management decisions regarding housing in small rural settlements across Scotland.

The RTPI is the UK body chartered to represent the planning profession and offers these comments from the point of view of a diverse and policy neutral professional body committed to supporting devolved government in Scotland. The Institute has 1900 members in Scotland working across all sectors of central government, local government, government agencies, the voluntary sector, private consultancy, the development industry and academia. Since devolution, the Institute has empowered its RTPI in Scotland Office, together with its Scottish Executive Committee, with the responsibility for working with government and public bodies generally for the improvement of the planning system in Scotland. This is in accordance with its charter obligation to work for the public interest.

The Institute does not wish to comment on all issues raised by the consultation. However, it hopes that the following comments may be of assistance to you in taking forward this work. Our comments are set out below under the relevant questions posed in the consultation paper.

Questions 1 - 3

Connections to strategic public sewers

The Institute welcomes the clarification of SEPA's detailed policy proposals on its approach to discussions with developers, local authorities and Scottish Water. We support the aim to ensure whenever possible eventual connections to the

strategic sewerage system and to support sustainable development of communities. We agree that the current lack of capacity in the public sewerage system is a major factor preventing and delaying new developments and that in common with other utilities, sewerage provision should be strategically planned and maintained for settlements and urban areas. The Institute strongly recommends that policy on provision of waste water drainage in and around rural settlements should be developed in line with local plan objectives for rural housing in support of wider sustainable community and rural development objectives. We support the need for early consultation between local planning authorities, Scottish Water and SEPA in this respect.

Questions 4 and 5: approaches to development constraints

The Institute supports SEPA's policy aims to work with Scottish Water and local planning authorities to develop more flexible approaches to the assessment of development constraints and to review problems related to infrastructure and discharge consents. We remain concerned about approaches to sites in settlements which may be required to meet a council's housing land supply during the period of the local plan and yet which may be restricted as a result of capacity restrictions on treatment works. In these cases we recommend a flexible and pragmatic approach and consider that private sewage treatment systems might be permitted providing a number of criteria are met. Such criteria include that the developer can demonstrate that the proposed system represents the best practical environmental option; the proposal will neither individually nor cumulatively have a material adverse effect on amenity, public health and the environment; it is designed and located such that Scottish Water would be willing to connect the development to the public system as and when there is sufficient capacity to do so; and the developer is able to guarantee that the system is maintained in perpetuity or until such time as it can be adopted as part of, or connected into, the public system.

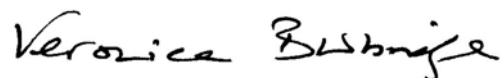
Question 6: the policy position for areas where no or limited public sewerage system exists

The Institute notes the difficulties which arise in relation to proposed development in small rural villages which have a public sewerage system (usually to a communal septic tank). Very often these systems are old, poorly maintained and in need of upgrading and expansion. There is a need for much closer co-operation and discussion between Scottish Water, SEPA and planning authorities in relation to such sites in local plan preparation and development management decisions. This should seek to support wherever possible new housing development in rural areas, particularly where there is a need for more affordable housing.

The Institute would therefore support SEPA's proposed policy position to regard small settlements where only limited public sewerage infrastructure exists as 'not sewered' and to allow houses to drain to private systems if they remain primarily small-scale and do not pose an environmental risk due to cumulative development. We agree that in areas where no or limited public sewerage infrastructure exists, it would be unreasonable to expect development of strategic infrastructure unless the proposed development itself is of sufficient scale to warrant it.

The Institute trusts that these comments are of assistance and has no objection to its comments being made available to the public in the usual way. Should you wish any clarification please do not hesitate to contact me at the RTPi Scotland, Edinburgh office: 57 Melville Street Edinburgh, EH3 7HL phone: 0131 226 1959, email: veronica.burbridge@rtpi.org.uk

Yours sincerely

A handwritten signature in black ink that reads "Veronica Burbridge". The signature is written in a cursive style with a large initial 'V' and 'B'.

Veronica Burbridge

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