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Dear Erica,

Consultation on National Islands Plan and Island Community Impact Assessment

Scottish Water welcomes the opportunity to comment on the above consultation paper.

In light of the range and complexity of issues covered by the consultation our response is detailed in the attached document.

Yours sincerely,

Brian Lironi
Director of Corporate Affairs



Consultation on National Islands Plan and Island Community Impact Assessment - July 2019

Scottish Water in the islands

Scottish Water provides vital water and waste water services across Scotland, including providing drinking water to communities on 58 islands, of which 45 islands also receive a public waste water service.

While serving Scotland's islands presents distinctive geographic challenges, Scottish Water is committed to providing the same high level of service to every customer, for the same low cost, no matter where they live.

National Islands Plan

Scottish Water welcomes the provision for development of a National Islands Plan by the Scottish Ministers to support improved outcomes for island communities.

While their geography presents some challenges, island communities are already at the centre of some outstanding examples of effective collaboration to overcome difficulties and achieve desired outcomes.

Scottish Water participates in and benefits from this including, for example, when an operational response is necessary to sustain services and support customers during extreme weather events.

Similar collaboration takes place in delivering longer term investment. Scottish Water has recently worked with the Fair Isle Electricity Company, Highlands & Islands Enterprise, Shetland Islands Council and other partners to deliver a community-led project which has secured a 24 hour electricity supply for the community for the first time, while also achieving significant benefits for the island's future water supply.

More broadly, Scottish Water seeks to place customers and communities at the heart of its decision-making. We recognise that this is particularly important in island communities, both to maintain and improve the essential services we provide, and to avoid or minimise any adverse impact on communities arising from operational and construction activities.

We hope the National Islands Plan will further encourage and support effective partnership working between Scottish Water, island communities, local authorities, other public agencies, developers, and other utilities to continue to improve outcomes for islanders.

Overcoming challenges and embracing opportunities

We recognise that providing essential services to our island customers presents distinctive challenges, but equally that there are distinctive opportunities for collaboration to overcome these and improve outcomes.

(a) Supporting growth

Scottish Water seeks to facilitate the economic development desired by government, communities and local stakeholders in the most sustainable and cost effective manner.

Islands present distinctive challenges, including, typically, higher costs due to their geography and, in some cases, limited fresh water resources due to small catchments, low volumes of natural water storage and significant variations in rainfall. These challenges mean that it is particularly important for Scottish Water to work closely with local authorities to understand local development requirements so that early consideration can be given to the strategic capacity that may be needed and any particular constraints that would need to be addressed.

(b) Improving and promoting: (i) sustainable economic development; (ii) environmental wellbeing; (iii) health and wellbeing; and (iv) community empowerment

Our interaction with the environment is not simply via the water we abstract, supply and discharge, and the standards that govern these. It also encompasses the way in which we operate within our environment, the resources we use, the emissions we create, the by-products we recover and the value we add to Scotland's environment.

As a leading environmental company supporting the Scottish Government's Environment Strategy and SEPA's ambitions for One Planet Prosperity, we will continue to reduce the ecological footprint of our services, support greater biodiversity, invest in natural capital and develop an increasingly circular approach to our services.

A number of island communities are served by small freshwater sources that are not connected to a wider water distribution network. Maintaining supplies during periods of water scarcity can, therefore, prove operationally challenging. Over the summer of 2018 many parts of Scotland experienced unusually dry weather, placing stress on water resources. During the hottest periods, demand increased by as much as 30% in some areas and water resource stocks fell well below average across Scotland. As a result one of the biggest road tanker operations was carried out in Arran, where we added three quarters of a million litres of water into the network. This summer we will be engaging with rural and island communities that have previously experienced issues of water scarcity to increase awareness of using water wisely. This work is important to ensure we remain able to meet the needs of our customers during periods of dry weather, while protecting the environment.

We recognise that island communities also have distinctive needs, as well as real strengths, in situations where the normal delivery of essential services such as water and electricity is disrupted by severe weather or other factors. Scottish Water is committed to working with communities and all relevant agencies to deliver a coordinated response in emergencies affecting the islands; and to promoting and maintaining the resilience which is already a notable strength of many island communities.

(c) Improving transport services

Transport services are critical to Scottish Water's day-to-day operations in the islands, as well as to the successful delivery of its capital investment programme.

On smaller islands, Scottish Water's locally-based employees can perform many tasks, but are supported by staff from off the island for any significant incident or specialist maintenance work. On the very few islands where no Scottish Water employees are based, we are reliant on nearby employees travelling whenever an

issue arises. This can therefore increase the time it takes to resolve an incident and potentially result in the risk of extended service disruption. Operational resilience is therefore a key aspect of managing service provision and planning investment.

(d) Improving digital connectivity

Digital connectivity is important to our customer service teams based across the Islands. Connectivity blackspots can often hinder the ability of our teams to work remotely or to contact our customers to provide service updates. In a number of island locations, we have worked with telecoms providers in rural areas to install masts within our sites to improve connectivity. We continue to provide this service through our commercial subsidiary, Scottish Water Horizons.

(e) Reducing fuel poverty

Across Scotland, including in the islands, Scottish Water has a long term partnership with Home Energy Scotland to promote water efficiency. This is important to ensure we can maintain supplies and protect the environment in island communities during periods of water scarcity. It also can offer customers significant energy bill savings through reduced use of hot water.

Scottish Water is keen to minimise the financial cost and carbon impact of the services we provide, including through the development of renewable generation capacity within our sites. This can also present opportunities to collaborate with community energy projects, as we have done recently in Fair Isle.

Island Communities Impact Assessment

Scottish Water recognises that each and every community is different – and that island communities have distinctive needs which should be fully considered in making decisions that affect their future.

We welcome the creation of Island Communities Impact Assessments and will take cognisance of the guidance that is being developed on their implementation.

Conclusion

Scottish Water is committed to achieving the same high level of service for our customers all over Scotland for the same low price, no matter where they live. We recognise that the challenges we need to overcome to achieve that goal are different in each part of the country – and that the island communities we serve have particularly distinctive needs.

A significant part of our investment programme since Scottish Water was established in 2002 has addressed the needs of our island customers – and investment for the future of their services will continue in consultation with communities and other stakeholders.

We hope the National Islands Plan will further encourage and support effective partnership working between Scottish Water, island communities, local authorities, other public agencies, developers, and other utilities to continue to improve outcomes for islanders.

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