

4. Written Responses – Questions

The Government's Proposal

1) Do you agree, in principle, that vacant non-household properties should be charged for water, sewerage and drainage services?

Yes No

Comments *NONE*

2) Do you agree that water and sewerage charges for vacant properties should be the same as those for occupied properties regardless of the reason for the vacant status?

Yes No

Comments *- SEE EMAIL DATED 16/06/2015*

Charges – Drainage Services

3) Do you agree that drainage charges should be the same as those for occupied properties?

Yes No

Comments *- SEE EMAIL DATED 16/06/2015*

Timetable for introduction

4) Do you agree that the current exemption should be removed from 1 April 2017?

Yes No

Comments *- SEE EMAIL DATED 16/06/2015*

Dear Sir / Madam

Please find attached completed consultation respondent form.

Unfortunately the "Comments" fields in the form are insufficiently sized to hold our response and as such we have listed our comments below for your consideration. We trust this is acceptable.

1) Do you agree, in principle, that vacant non-household properties should be charged for water, sewerage and drainage services?

Yes

2) Do you agree that water and sewerage charges for vacant properties should be the same as those for occupied properties regardless of the reason for the vacant status?

Yes - Disconnection of services for permanent or long-term empty premises should be encouraged for reasons of public health and water conservation, however, the prospect of financial relief will undoubtedly act as the most powerful incentive for many customers. Whilst we acknowledge that permanent disconnection should be a requirement in order to benefit from such relief our experience suggests that the disconnection costs currently levied by Scottish Water are often prohibitive. Although quotations are supplied on a case-by-case basis having recently received 3 such quotations ranging from £2000 to £3000 we believe that current pricing should be reviewed to ensure that it is not only fair and reasonable but fully transparent of labour and materials.

3) Do you agree that drainage charges should remain the same as those for occupied properties?

Yes - Whilst we agree that customers should pay for the services they receive regardless of site occupancy, we also believe that the financial impact of removing the existing cross-subsidy status on some customers will serve to further highlight the unfairness of the current charging methodology. The RV based charging model does not reflect the services received by customers on the basis that property ratings assessments are as much influenced by location as site area, and in many cases customers incur charges that are wholly unreflective of the amount of surface water collected from their premises (city centre locations by way of example). With both vacant relief and the correct use of RVs currently under review by the industry we strongly believe that now is an opportune time to consider the introduction of the much fairer site area based charging system deployed by a number of water companies in England. Although it is extremely difficult to accurately assess the costs to serve each individual customer we believe that the premise that a customer's site area reflects the amount of surface water collected from roofs, paved surfaces and public roads is a fair and reasonable one. The RV system has served a purpose until now, however, it should be recognised that it is no longer appropriate due to the arbitrary relationship between RVs and drainage infrastructure. With discussions already underway regarding the continued use of the 31st March 2000 RV we believe that the industry should remove itself from this unnecessary debate and seek to overhaul the current charging structure in its entirety – thus ensuring that charges are based on service rather than the property value.

4) Do you agree that the current exemption should be removed from 1 April 2017?

No - Any removal of exemption should be suitably communicated to customers no less than 24 months in advance of the changes being introduced. Such communications should not only be made to the industry in general but directly to all those customers immediately effected by the changes – clearly stating the financial implications of the changes to their organisation. This is essential in

order to allow organisations to budget for the pending changes, which in some cases could be significant.

Yours faithfully

Eddie