

National Planning Framework 4: Call for Ideas

The Scottish Flood Forum is an independent organisation and charity which supports individuals and communities at risk from flooding. We welcome this opportunity to contribute at this 'call for ideas' phase prior to drafting National Planning Framework 4.

As noted in Elaine Fotheringham's 'think piece' on flooding, at present 284,000 properties (homes, businesses, services), are at medium risk of flooding in Scotland. Should action to reduce greenhouse emissions in line with current targets be limited, by the 2080s this number of properties will increase by 110,000. Such an increase in flood risk is seen by the Scottish Government as one of the most challenging impacts to be addressed in its Climate Change Adaptation Strategy.

In light of these findings, and in response to this 'call for ideas' we provide the following responses to the questions posed:

1. What development will we need to address climate change?

- (a) A key concern in reducing the impact of flooding is controlling new development on the functional floodplain now and in the future. At present whilst developers are recommended to make an allowance for the impact of climate change on flood risk when submitting a planning application, this is not required. But as the 'think piece' on flooding accompanying this 'call for ideas' notes, "development awarded planning permission today will, in all likelihood, still be standing in 2050". Accordingly, a formal allowance for an increase in flood risk as a result of climate change should be required as part of a planning application.

We recommend that advice from SEPA to local authorities on whether or not to permit development within the functional floodplain should require developers to make an allowance for increased flood risk in light of anticipated climate change. This should be incorporated in National Planning Framework 4.

- (b) Handling and management of advice from SEPA to local authorities on flood risk within the functional floodplain raises another issue. At present there are concerns from community groups as to whether SEPA's guidance is always accepted by local authorities or adhered to by developers. There is also a lack of transparency in the process of how planning authorities proceed when SEPA has an outstanding objection to a proposed development. It is important that the general public and other interested parties know the extent to which SEPA's advice has a bearing on the outcome of planning applications at both local and national levels.

We recommend that the advice offered by SEPA to planning authorities on development within functional floodplains, the action taken and the respective roles of local authority officers and elected members should be more readily accessible by the general public. This should be incorporated in National Planning Framework 4.

- (c) Noting the importance of promoting resilience "how places can be made more resilient to the long term impacts of climate change", in the suggested 'call for ideas', a key issue here is 'property flood resilience', i.e. actions that seek to prevent the ingress of water into a property and reduce the amount and cost of damage should a property become flooded. Property flood resilience is increasingly seen by local authorities and others as a key action for reducing both the costs and the long-term impacts of flooding on properties, individual households and communities. Actively promoting such measures in planning guidance alongside revised Building Standards would represent a major advance in enhancing

resilience to flooding in high risk communities. At present home reports, required in purchasing a new house, do not include any reference to flood risk. Home reports should include a mandatory section on whether the property is at risk of being flooded and whether any measures have been undertaken by the vendor to install property flood resilience.

For further information on property flood resilience see <https://www.gov.scot/publications/living-flooding-action-plan-delivering-property-flood-resilience-scotland/>.

We recommend that the formal promotion of property flood resilience be included in National Planning Framework 4 and that home reports include a mandatory section on flood risk and any measures taken by the vendor to enhance property flood resilience.

2. How can planning best support our quality of life, health and wellbeing in the future?

- (a) A key mechanism for making places more resilient is involving local communities in decision-making. In many parts of Scotland community resilience groups exist which provide emergency action during events (such as floods) and promote a more resilient approach to reducing the impact of subsequent emergencies. The Scottish Flood Forum promotes and facilitates such groups. These groups report that engagement between them and local authorities needs to be placed on a more formal basis. Giving such community groups guaranteed access to appropriate local authority fora, as required under the Community Empowerment (Scotland) Act 2015, especially in terms of planning and flood risk management, would be empowering and help ensure more effective and efficient deployment of local authority and community assets during and after emergencies.

For further information on the work of the Scottish Flood Forum on community resilience see <https://scottishfloodforum.org/resources/local-authority-assistance/#leaflet>.

We recommend that the important role community groups have to play in the planning process be recognised formally within National Planning Framework 4.

3. What policies are needed to improve, protect and strengthen the special character of our places?

- (a) Managing surface water flooding is major challenge for Flood Risk Management Authorities as it often arises suddenly in response to intense rainfall when urban drainage systems are overwhelmed and local ponding occurs. Controlling such runoff in urban areas is mainly undertaken by installing 'sustainable urban drainage systems' (SuDS). These comprise the temporary storing of flood waters in detention ponds, the use of vegetated swales, green roofs and porous roads and pavements to enhance the infiltration of storm water into the underlying soil, and replacing culverts with open water courses. SuDS not only help manage flood risk but also strip out sediment and pollutants from runoff and enhance biodiversity, especially in the margins of detention ponds and along the banks of opened up water courses. The provision of such blue-green infrastructure, most notably in urban parks, also contributes to place-making and promotes more healthy living, recreation and better mental well-being.

Ideally development plans should incorporate Urban Flood-sensitive Zones where SuDS and other blue-green infrastructure is mandatory with the overall aim of controlling urban creep and reducing flood risk. Collectively such initiatives are termed promoting 'blue-green cities' and provide a striking example of the multiple benefits that can result from a more holistic approach to urban planning and place-making.

We recommend that the active promotion of 'blue-green' infrastructure be an integral component in National Planning Framework 4.

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