

## Flood risk management plans consultation

### Overview

#### General Comments

Thank you for the opportunity to take part in the consultation on the draft Flood Risk Management (FRM) Plans. As you will be aware, Scottish Water has worked with SEPA prior to publication to agree the relevant actions identified and we are, therefore, broadly supportive of them.

We also appreciate the challenging conditions which SEPA and local authorities have developed the Cycle 2 FRM Plans in and the fact that this has necessarily led to a limited format and delayed implementation of the consultation. However, having now been through two cycles of FRM planning there are a number of areas Scottish Water suggests should be considered for improvement and these are outlined in our response to questions 10 and 11. Scottish Water would be happy to work with the responsible authorities through the Scottish Advisory & Implementation Forum for Flooding (SAIFF) groups to enable these improvements.

### Detailed Response

#### Specific Comments

Significant progress has been made throughout Cycle 1 of the FRM Strategies to tackle flood risk across Scotland, with the primary focus being on river flooding studies and schemes. The second National Flood Risk Assessment has enabled a much better understanding of flood risk from all sources, providing risk and hazard data for use by all authorities. This process has highlighted that the risk from surface water is the primary source of flood risk across Scotland, and this risk is projected to increase significantly with the impacts of climate change.

The framework for managing surface water in Scotland is particularly complex and requires collaboration across a number of organisations. The current policy, funding and legislative framework can make it difficult to achieve substantial joint action to reduce the risk of surface water flooding in our towns and cities. This has been recognised by the Scottish Government's Water Resilience Places Policy Framework as one of the main challenges in achieving "a fully unified approach to the management of surface water in Scotland encompassing existing-retrofit and new-build".

We are concerned that not enough clear and tangible actions to manage surface water flood risk are included within the plans (apart from the requirement for local authorities to prepare Surface Water Management Plans (SWMP)). We would suggest that the recommendations contained in the document are developed during Cycle 2 of the FRM plans so that more detailed actions can be included for Cycle 3.

We strongly recommend that, in areas where a SWMP has been, or is due to be carried out, clarity is provided as to how these plans are being used to inform actions

to manage surface water flood risk in Cycle 2 and which organisation will be responsible for leading the delivery of future actions. We believe that this clarity is necessary to enable effective collaborative working across organisations.

<b>1</b>	<b>What is your name?</b>
Grant Vanson, on behalf of Scottish Water	
<b>2</b>	<b>What is your email address?</b>
For any queries with the response please contact the flood risk management mailbox – <a href="mailto:frm@scottishwater.co.uk">frm@scottishwater.co.uk</a>	
<b>3</b>	<b>What is your interest in this consultation? Are you responding on behalf of:</b>
Scottish Water	
<b>4</b>	<b>This is a joint consultation with local authorities. Are you happy for your responses to be shared with the local authority?</b>
Yes, we are happy for our responses to be shared in full.	
<b>5</b>	<b>Do you agree that we have identified the main communities and infrastructure that required flood risk management objectives and actions within the Local Plan Districts?</b>
As a responsible authority Scottish Water has been involved in the production of the FRM Plans and has supported SEPA in the production of the documents. We are happy with the method used to identify and designate the Objective Target Areas based on predicted risk from various flooding sources, including the main communities and infrastructure requiring objectives and actions.	
<b>6</b>	<b>Are you responding on behalf of a Scottish local authority, or other public sector flooding partner? (Required)</b>
Yes	
<b>7</b>	<b>Which local authority or partner body do you represent?</b>
Scottish Water	
<b>8</b>	<b>What target areas objectives and actions are you responding to</b>
This response has been developed as a single national response from Scottish Water to cover all Local Plan District and Potentially Vulnerable Areas.	
<b>9</b>	<b>Do you agree with the objectives set for each of the target areas you have identified above?</b>

As a responsible authority, Scottish Water has been involved in the production of the FRM Plans and has supported SEPA in the production of the documents. We are happy with the general approach for setting long term objectives and agree that the objectives presented for the target areas reflect the principles of the FRM Act.

10	<b>Do you agree with the proposed actions for the target areas you have identified above?</b>
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Scottish Water has agreed and reviewed all actions related to our activity and under our responsibility which are included in the FRM Plans.

Whilst we have been unable to carry out a detailed review of the actions on other responsible authorities (apart from those relating to surface water flood risk), previous collaborative working with these bodies means that we are confident they have identified, included and prioritised actions appropriately.

We note the absence of clear actions against Section 17 of the FRM Act (*local authority to prepare maps of bodies of water, including SUDS*). We recommend these should be included within the FRM Plans. This is a key national dataset that is not currently well understood by all organisations but has a significant influence on our understanding of the existing surface water drainage network and the potential opportunities to manage surface water flood risk. This requirement could potentially be incorporated by local authorities within their Surface Water Management Plans however clarity on *how* Section 17 will be met is required.

To provide a fuller picture of the extensive work that Scottish Water carries out to reduce sewer flood risk across Scotland, we intend to supply text to be included in the background section of the FRM Plans to outline Scottish Water’s Strategic Plan ambitions and investment approach for flood risk priorities, as included in Cycle 1.

We believe it would be beneficial for all responsible authorities to reflect on how the FRM Strategies can be presented for Cycle 3 to:

- create a more comprehensive picture of work carried out by all organisations which are not strictly inked to FRM Act responsibilities
- show how future actions can be linked to the Water Resilient Places recommendations.

This may help to increase public understanding and confidence in the actions of responsible authorities.

11	<b>Can you tell us any other organisations you think we should be working with on these plans?</b>
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Scottish Water believes that a closer working relationship with Transport Scotland and Network Rail will be key in building a complete picture of the surface water drainage network that includes the drainage assets for which these authorities are responsible.

Both Transport Scotland and Network Rail may also benefit from a more comprehensive understanding of flood risk to their assets by working more closely with other responsible authorities.

Scottish Water would like to highlight that while the Scottish Government and SEPA played a leading role in driving the FRM strategies and guidance for Cycle 1, engagement with responsible authorities has reduced in preparation for Cycle 2.

Greater engagement with the Scottish Government to help steer, support and progress actions identified in the FRM Plans would be welcomed. This should come through the re-establishment and co-ordination of the SAIFF groups which have been an effective platform to develop and provide guidance. This is particularly relevant to enabling a platform for advice on the management of surface water, where significant concerns over the lack of support and guidance for responsible authorities remain.

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