

Flood Risk Management Plans Consultation 2021

Response from The Scottish Flood Forum

Scottish Environment Protection Agency
Angus Smith Building
6 Parklands Avenue
Eurocentral
Holytown
North Lanarkshire
ML1 4WQ
Email: FRMplanning@sepa.org.uk



The [Scottish Flood Forum](http://www.scottishfloodforum.org.uk) is a Scottish Charitable Incorporated Organisation No. SC043783, registered office Caledonian Exchange, 19A Canning Street, Edinburgh, EH3 8HE

Introduction:

The Scottish Flood Forum (SFF) welcome the opportunity to submit a response to the flood risk management plans consultation and commend the work of all agencies to manage the risk of flooding in Scotland. We are responding to this consultation as a recognised partner contributing to the development of FRM. Please accept this written response on behalf of the SFF as the online consultation is not suitable for a national organisation. The SFF give consent for our response to be shared with anyone and any agency as an open and transparent charity.

The SFF are responding to the consultation as the only charity in Scotland dedicated to supporting flood risk communities to plan, prepare, respond and recover from flooding. This includes supporting communities who have been directly impacted by flooding, working with them to set up community resilience groups through independent and impartial support and offering training and information to build community resilience. To facilitate this, our activities also include supporting responsible authorities to engage flood risk communities before, during and after flooding. The flood risk management plans provide an important framework to plan our work priorities over the next FRM cycle.

Key Consultation Questions:

Do you agree that we have identified the main communities and infrastructure that required flood risk management objectives and actions?

No. The datasets used to define flood risk communities are not fully open and transparent. Restricting “*main communities*” to the number of properties and level of damages only takes into consideration the direct costs of repair and restoration caused by flooding. It does not fully take in to account other socio-economic criteria such as vulnerability which contribute to the overall risk rating of an area such as the number of elderly and low-income households and ageing population. There are many definitions of community to be considered which would be more inclusive of the diverse areas of Scotland impacted. The term “*main communities*” could be interpreted as being more important than the many smaller at-risk communities, who will not qualify for FRM objectives and actions. A national FRM framework may be able to consider a more equitable way of allocating funding to manage flooding.

Do you agree with the objectives set for each of the target areas you have identified above?

No view as we are responding with a national but independent and impartial view on flood risk management.

Do you agree with the proposed actions for the target areas you have identified above?

No view as we are responding with a national but independent and impartial view on flood risk management.

Joint Working Opportunities:

Can you tell us any other organisations you think we should be working with on these plans?

Nationally

Work with Scottish Government and key FRM stakeholders on a national strategy or framework that guides flood risk management plans. This can cover the main national aims, indicators, progress and the funding model.

By developing a national framework, this would help to underpin the basis for decision making on flood risk management across Scotland with better transparency. The variable nature of approaches and application of formula by local authorities is not easily understood by flood risk communities in the prioritisation of risk between communities with a similar experience of flooding within close geographic locations. A national framework could help to build a wider understanding of the local risks within communities helping to develop local flood resilience initiatives.

A scaled suite of FRM options would also be useful in helping promote self-help amongst property owners where large scale FRM is not feasible.

Locally, we have identified that there is an opportunity to work more closely with communities on a number of opportunities which we suggest could be divided in to immediate, short term (18 months) or longer term (2-6 years). These are as follows:

Immediate Priorities:

Working with Communities :Developing Community Flood Resilience:

Community Engagement:

There is an opportunity for FRM pre-consultation engagement by utilising local knowledge, skills, and data from community resilience groups in the preparation of draft flood risk management plans, studies and actions going forward. The SFF are able to help facilitate engagement with flood risk community groups.

All of the flood risk management plans should include a statement that supports the development of community flood resilience groups. This can include:

- A statement that recognises and values the work of community flood resilience groups and their important contributions to flood risk management.
- This statement could link to the Scottish Government National Performance Framework community outcome that states: [We live in communities that are inclusive, empowered, resilient and safe.](#)

The SFF are willing to work with key stakeholders in developing this statement.

The SFF would welcome the production of another FRM infographic similar to the one produced for the first FRM cycle as a useful engagement tool. The SFF would be willing to support this through their community networks.

Community Learning Priorities:

There is an opportunity for FRM stakeholders to increase the availability of learning opportunities for community flood resilience volunteers. The SFF continues to collaborate with the British Red Cross, Scottish Fire Rescue Service, Royal National Lifeboat Institution, Lifelines Scotland, Radio Amateur Emergency Network in providing high quality learning sessions for volunteers. This is a key action to increase the knowledge, skills, and experience of volunteers to create flood resilient communities and a wider community resilience dividend. This dividend helps to create communities that are inclusive, empowered, resilient and safe and able to mobilise to meet the increasing frequency of flood events across Scotland.

Community Engagement:

The SFF request that Responsible FRM authorities consider the adoption of a set of principles to guide engagement with flood risk communities. [A draft set of principles has been produced by the SFF](#) as part of a suite of good practice guidance.

There is an opportunity to work with the SFF to review the draft principles and these could be incorporated into a FRM national framework.

Insurance:

Where the FRM plans advise that people should ensure their properties are insured for flooding the plans should clearly signpost key information such as [Floodre affordable insurance](#), [British Insurance Brokers Association](#) for businesses and the SFF for advice.

Short Term: 18 months

Training & Learning:

In addition, there is an opportunity for the development of a national framework that encourages recognised vocational qualifications such as [CIWEM PFR](#) Training which will help to increase the uptake of property flood resilience measures.

Other Opportunities for Future Joint Working and Identification of Stakeholders:

The following questions are posed as potential areas to improve joint working opportunities and the SFF can provide independent support to help facilitate engagement with flood risk communities.

- SEPA: The SFF experience in engaging flood risk communities has identified a variety of understandings of flood risk and planning guidance. It may be useful if SEPA consider reviewing its planning guidance and consider a community focussed information note?
- Scottish Water: In engaging flood risk communities the role of Scottish Water can often be misunderstood in relation to housing developments and drainage impact assessments. It may be useful for Scottish Water to consider developing community information on the process used to make drainage impact assessments.
- FRM stakeholders: The SFF regularly find that there is a low level of understanding in flood risk communities of the process used to make FRM decisions and calculate cost benefit ratios. The SFF would welcome the opportunity to work with SEPA and local authorities to help to provide better learning opportunities to community flood groups on the [multi coloured handbook](#) as the basis for making nationally important FRM decisions. This could support better transparency, scrutiny, and community involvement in FRM decision making. The SFF would be willing to support this piece of work by facilitating this through its national peer to peer networking events.
- Clarification of Responsible Authorities: In working with flood risk communities the SFF have come across some ambiguity as to whether Transport Scotland are identified as a FRM Responsible Authority. In addition, several communities have suggested that the Crown Estate should be identified as a responsible FRM agency. It would be useful to have this clarified.

Medium Term 2 – 6 years:

Communication of Flood Risk:

- A review of how this is communicated to the public would be beneficial.

- The following research is given as a reference point: <https://www.zurich.co.uk/en/about-us/media-centre/general-insurance-news/2021/warning-over-hidden-flood-risk-as-buyers-dash-to-beat-stamp-duty-deadline>. The SFF is willing to support this by assisting with the testing of community views.
- There is a lack of understanding of commonly referenced terms used by responsible authorities when communicating flood risk and legal responsibilities. It would be beneficial to have a community information note or glossary of terms referenced as standard to facilitate engagement, understanding of rights and responsibilities e.g. on flooding, common law, riparian responsibilities and legal overview.
- Some planning authorities issue guidance to developers and we can see a benefit to this becoming standard practice across all areas. The following guidance was given by Community Flood Groups as good practice examples.

Comparative reference points given as: [England & Wales guidance: Rainfall and runoff management for developments, Environment Agency 2013](#).

Second reference point example given as: [Flood Risk Assessment and Drainage Impact Assessment: Planning Guidance for Developers, Glasgow City Council, 2011](#).

A third reference point can be viewed at: [Moray Council, 2018, Flood risk and drainage impact assessments for new developments](#).

- Flood risk assessment check list: Is there scope for these assessments for developers to be amended to consider hydraulic capacity for receiving watercourses?
- We request that every local authority consider the benefits of using a flooding mailbox to support engagement with flood risk communities.
- We request that Responsible Authorities work with the SFF to produce a community focused SUDS information to facilitate better understanding and engagement on this issue.

There may be an opportunity to devise a national property flood resilience programme to help people adapt their properties to flooding and combine this with climate change adaptation programmes for energy efficiency. This can be guided by the CIRIA [code of practice for property flood resilience](#) and the Scottish Government's [Living With Flooding Action Plan](#). This can build on the support offered by Borders, Dumfries and Galloway, Aberdeen City and Aberdeenshire councils to incentivise property flood protection products and the [Floodre betterment proposals](#). The SFF is willing to support the development of a national PLP adaptation programme.

Summary:

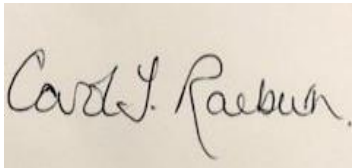
The SFF commend the immense amount of work and dedication invested by flood risk communities and FRM professionals over the first FRM cycle. Climate change is increasing the frequency and risk of flooding to Scotland's communities and this presents enormous challenges. The SFF stand ready to rise to those challenges with our partners by continuing to offer our dedicated support to help communities recover from flooding and build better flood resilience. To enable this we need to place those who experience the greatest impacts of flooding at the heart of the FRM process. The 2011 Christie Commission report was ground-breaking in setting the future direction of public service delivery.

It stated:

“Reforms must aim to empower individuals and communities by involving them in the design and delivery of the services”

There are good examples of this in the first FRM cycle such as SEPA’s work to develop a new public flood guidance statement from scratch with flood risk communities.

The most important stakeholder in FRM is those who have flooded and have intimate knowledge and experience of both the damages from flooding and the benefits of a flood resilient community. We must strive to identify opportunities where we can actively involve the people from flood risk communities in the definition, design and delivery of FRM as advised by the [Scottish Government in their vision for public services](#).

A rectangular image showing a handwritten signature in black ink on a light-colored background. The signature reads "Carol J. Raeburn" in a cursive script.

Carol Raeburn ,Director

On behalf of the Scottish Flood Forum

Email: admin@scottishfloodforum.org