

Main Issue 9

Flood risk and climate change resilience



How can
Planning help
protect and
prepare for
future events?

Background

Flooding can have significant impacts on people, businesses, infrastructure, and the visitor experience. Climate change is likely to increase the frequency and severity of flood events in some places.

The recently approved series of **Flood Risk Management Strategies and Local Flood Risk Management Plans** aim to co-ordinate efforts to tackle flooding across Scotland. These have been led by SEPA and local authorities, although the Cairngorms National Park Authority has also played a role in helping to develop them. The strategies and plans identify specific actions that will be used to address flood risk during the period from 2016 to 2021. However, they also identify the more general importance of the planning system in helping to avoid future development in areas that are at risk of flooding.

Scottish Planning Policy also notes that the planning system can play an important part in reducing the vulnerability of existing and future

development to flooding. It states that the planning system should prevent development which would have a significant probability of being affected by flooding or would increase the probability of flooding elsewhere, and that local development plans should apply a risk based approach to guide new development. We need to ensure that the next Local Development Plan addresses these issues.

In addition, the National Park Partnership Plan aims to promote more use of natural flood management in appropriate areas. Natural flood management involves the use of natural measures to slow water flows, and can include measures such as woodland planting, peatland restoration, or the re-naturalisation of river channels. Although many of these measures are outside the control of the planning system, there may be opportunities for the next Local Development Plan to help promote the use of natural flood management in some instances – particularly in new development proposals.



Preferred Option

The current Local Development Plan already includes robust policies on flood risk and climate change resilience. Its policies promote a risk-based approach to new development in areas of flood risk in line with Scottish Planning Policy guidance. In particular, its policy on flood risk requires that new developments should be free from significant risk of flooding, not increase the risk of flooding elsewhere, not add to the area of land that requires flood mitigation measures, and not affect the ability of the functional flood plain to store or move flood waters.

We think that the existing Local Development Plan's policy on flood risk in new developments remains up-to-date and relevant, and we therefore propose to retain this approach within the next Local Development Plan.

In addition, we have reviewed all of the existing site allocations that are proposed to be taken forward into the new Local Development Plan, along with any new allocations that we propose to make within the new Plan, to ensure that they are not at significant risk of flooding and that they are not likely to increase the risk of flooding elsewhere. The results of the review process are outlined in a Strategic Flood Risk Assessment, which we have published alongside this Main Issues Report.

However, we also think that there may be scope for the new Local Development Plan to place greater emphasis on the contribution that new developments can make towards natural flood management. In particular, we think that the new Plan could include stronger requirements for

new built development proposals to include Sustainable Drainage Schemes (SUDS) where appropriate. These can include measures such as soakaways, storage ponds and swales to manage water in more natural ways and help to slow the flow of water from new developments, particularly during times of heavy rainfall. In addition to their benefits in managing flood risk, SUDS can also deliver significant environmental benefits because they often create new and improved habitats for wildlife.

Whilst SUDS are encouraged by the existing Local Development Plan, we think the new Local Development Plan could include a stronger policy requirement for the incorporation of SUDS to be considered within new development proposals. We think this requirement should apply to all built developments, as SUDS can apply at a range of scales.



Reasonable Alternative Options

It would be reasonable to continue to apply the existing Local Development Plan's approach to SUDS. In effect, this would continue to encourage the use of SUDS without including any stronger policy requirement to include SUDS where appropriate in new developments. However, we do not think this option would help to deliver the National Park Partnership Plan's priorities for promoting natural flood management.

As a further alternative, the proposed SUDS policy requirement could also be written so that it only applies to larger developments. This could mean, for example, that small-scale developments such as house extensions or single houses would not be required to consider the inclusion of SUDS. There might be some benefits to this approach, and it would reduce the level of information required in support of smaller scale planning applications. However, we think that SUDS are applicable to built developments of any scale. We think that the preferred approach is therefore more appropriate, although we will need to make sure that any SUDS requirements are proportionate to the scale of development proposed.



Questions

- Do you agree that the new Local Development Plan should include a stronger policy requirement for Sustainable Drainage Schemes to be considered in all new development proposals?