

SUBMISSION FROM RENFREWSHIRE COUNCIL

I refer to the Proposed National Planning Framework for Scotland 2 (NPF2) which is currently being considered by the Local Government and Communities Committee of the Scottish Parliament. I shall report on the document to the Planning and Economic Development Policy Board of Renfrewshire Council at its next meeting on 13 January 2009. My report will generally welcome the Proposed NPF2 but will make comment on two issues, (a) Water and Drainage and Flooding and Water Resource Management and (b) Improvements to the M8. Detailed comments on these issues are set out below.

As the deadline for submission of evidence to the Local Government and Communities Committee on this matter has been set for Monday 12 January 2009, I have sent the relevant comments included in my report to you prior to their being considered by the Council's Planning and Economic Development Policy Board. If the Board decides to change any of the recommendations I shall write to inform you. With that caveat, I should be pleased if you would treat the attached comments as a submission of evidence to the Local Government and Communities Committee

(a) Water and Drainage and Flooding and Water Resource management.

In response to the *National Planning Framework 2: Discussion Draft* the Council welcomed the recognition given to the importance of flooding and water resource management. However it pointed out that experience in Renfrewshire suggests that strategic investment alone will not deal with the type of sewerage constraint which is prevalent in the urban areas of Renfrewshire. In general, development constraints result from the under-capacity in the combined sewerage network, its interaction with watercourses and reliance of the network on combined sewer overflows (CSOs) for relief. Such conditions require a holistic view to be taken of drainage systems, watercourse and sewerage network capacities, and the development of integrated, catchment-based solutions to surface water management. The potential for such an approach to produce

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cost-effective, sustainable drainage solutions for development has been demonstrated by studies such as the Glasgow Strategic Drainage Plan and the Interreg IIIB Urban Water Project, in which Renfrewshire Council has participated. The Council's response to the NPF2 Discussion Draft pointed out that it is fundamental to the success of the new approach to surface water management that mechanisms are developed for the integration of supporting actions within the development planning process and that links are established between the planning process, Scottish Water's investment process and SEPA's River Basin Management Planning process. The Council has also advocated this approach in its response to the consultation on the new Flood Risk Management Bill.

Unfortunately the proposed NPF2 does not adequately reflect the above suggestions and consequently does not provide an adequate national planning policy framework for flooding.

We are currently at a point where major changes are about to be introduced in relation to the management of flood risk and the water environment through the Flood Risk

Management (Scotland) Bill and the River Basin Management Plans respectively. The Flood Risk Management Bill is currently being considered by the Scottish Parliament and the consultative draft River Basin Management Plans were issued on 22 December 2008 by SEPA. Both of these will have a major influence on the planning system. Local authorities are designated as “responsible authorities” under the Water Environment and Water Services (Scotland) Act 2003 which requires councils’ engagement in River Basin Management Planning; and it is expected that local authorities will be designated as “responsible authorities” under the Flood Risk Management Bill which will allocate specific responsibilities to councils. A substantial proportion of the responsibilities placed on Councils will be exercised through the development plan process and through development management. It is essential that the NPF2 fully reflects the implications of these major statutory documents and provides guidance of the way in which planning will require to embody and give effect to flood risk management and protection of the water environment generally.

The policy memorandum which was issued in conjunction with the Flood Risk Management Bill states that planning decisions remain one of the most powerful tools available for managing flood risks and that there will require to be a two way interaction between development planning and flood risk management planning. It advises that the Bill requires consideration of development planning when setting objectives to manage flood risk. The Flood Risk Management Bill also requires all public bodies to have regard to flood risk management plans when exercising their relevant functions including development planning. It states that the expectation is for subsequent planning legislation to include a specific provision requiring local authorities to have regard to flood risk management plans when preparing development plans. This will emphasise the important links between the flood risk management planning process and development planning. The policy memorandum also indicates that it is anticipated that a review of the Scottish Government's planning guidance on flooding will be considered in light of the provision set out in the Bill.

The proposed NPF 2 does not fully reflect this and consideration requires to be given to strengthening the statement in the NPF2 to fully reflect the actions required and priority which requires to be given to flooding.

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Detailed comments on Paragraphs 172 – 178 of NPF2

Paragraph 172 requires to recognise that the renewal of drainage infrastructure will not be a matter solely for Scottish Water but will also involve local authorities, private developers and land owners. There needs to be coordinated action by these various parties to ensure that investment is coordinated and complementary and that the planning system will form a key mechanism to secure this.

Paragraph 173 and 174 requires to acknowledge the substantial contribution to drainage infrastructure which will come from local authorities and private developers. Whilst it is correct to state that there is a requirement on Scottish Water to provide strategic drainage infrastructure, much of the problems in drainage arise from old local drainage networks which are often inadequate to handle flows arising from flood events. It is therefore incorrect to state that “lack of capacity in water and drainage infrastructure should no

longer be a significant constraint on development;" there is at least a need to explain the nature of the drainage infrastructure to which reference is being made. It is anticipated that a substantial proportion of new developments will require to incorporate flood remediation measures in order to assist in "demand reduction" i.e. reducing the flow of water entering the drainage network. The planning system will play a key role in this by setting policy frameworks in Development Plans and by implementing these through the Development Management process. The proposed NPF2 also does not give any recognition to the key problem of overland flow which is now recognised as a major source of flooding and for which Scottish Water has no direct responsibility. There is also a requirement to distinguish between Scottish Water's prioritising of its investment in the removal of development constraints and its investment in measures to meet European water quality standards under its Q&S programme. At present the text implies that these are one and the same thing.

Paragraph 176 correctly refers to a projected increase in flood risk but acknowledgement also requires to be given to the problems which currently exist. The existing problems mean that flood management measures often have to be incorporated into development proposals. In respect of the reference to the SEPA flood map, NPF2 states that SEPA's internet based flood maps "will help to inform decisions on the location of development and provision of mitigation and attenuation measures where vulnerable sites have been selected for development." This does not fully reflect SEPA's web site which states that users of the flood map should note that it "has been developed to give an indication of whether a general area, not individual properties or specific location, may be affected by flooding." In addition the SEPA flood maps provide only an estimate of flooding arising from river and tidal effects; they do not take account of flooding arising from overland flow nor from constrained drainage networks. The reference to the SEPA flood map may lead to a misunderstanding of its role and the NPF2 should be amended to properly reflect the intended role of the SEPA flood map.

Paragraph 178 The NPF2 refers to the role of canals in catchment management and flood risk reduction. It would be useful to explain what their role will be. The final sentence relating to the Flood Risk Management Bill does not accurately express the implications of the Bill for Planning. It is suggested that the last sentence should read, "*All designated responsible authorities will work together to produce local flood management plans identifying measures, funding and timescales required to secure an integrated approach to flood risk reduction. These local flood risk management plans will require to*

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be taken fully into account through the Development Plan and Development Management processes."

(b) Improvements to M8 motorway

The Proposed NPF2 refers to the Glasgow Airport Rail Link but makes no reference to M8 improvements in relation to Glasgow International Airport. In contrast the Strategic Transport Projects Review (STPR) includes the proposed intervention - "Using Intelligent Transport Systems on Parts of the Road Network to Enhance Capacity and Operations." The STPR states that the introduction of this on the M8 between Glasgow and Inverclyde would significantly contribute to the objectives to promote efficient and effective transport links to support the development and implementation of the proposed national

development at Glasgow Airport identified in NPF2 and to improve the A8/M8 during periods of peak demand. It is recommended that, in view of the potential importance of this improvement to the M8 for the development of Glasgow Airport, as well as for the whole of Renfrewshire and beyond, reference to this proposal in the STPR should be incorporated in the NPF2.

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Director of Planning and Transport

6 January 2009