

Response ID ANON-USYV-F996-5

Submitted to **One Planet Prosperity: Our Flooding Services Strategy**

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Introduction

1 What is your name?

Name:

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2 What is your email address?

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3 What is your organisation?

Organisation:

Scottish Property Federation

Planning for the future

4 Our Government has declared a climate emergency and there is already clear evidence of climate change impacts on flooding in Scotland. Do you agree that our Flood Maps, National Flood Risk Assessment and Flood Risk Management Strategies should consider the impact of a high emissions climate scenario?

Not Answered

Please explain the reason for your answer:

The Scottish property industry is committed to playing its part to help the Scotland achieve net zero by 2045. None the less, as a result of global warming it is recognised that there will be an increased risk of flooding occurring in Scotland. Extreme weather events are becoming more common and we must be prepared to meet the challenges this brings to our communities affected by the risk of flooding.

While flooding is more likely to occur under a high emissions scenario, it is important to approach all assessments of flood risk with a view that technical solutions often exist and that attenuation measures are usually available. Blanket restrictions on development could have significant unintended consequences for our housing and commercial property supply, and the existing building stock. One example is the impact on the insurance available to property owners, not only in the domestic sector but also for commercial properties. The issue of insurance has the potential for knock-on impacts for homeowners, investors and those that depend on such assets, including those who have part of their pensions invested in property.

There are also implications for the valuation of properties deemed to be at risk of flooding. This has an impact on those who hold such assets, including pension funds and local authorities, and decreases the attractiveness of the area to investors, which will have wider economic impacts and consequences.

There is also a wider contention at play between the need to keep investing in and growing our existing cities and towns and mitigating the effects of flooding. Many of Scotland's largest conurbations are situated beside rivers and estuaries due to historic necessity which subsequently puts them at heightened risk of the consequences of climate change. Despite this risk, however, there is no option to move our urban centres elsewhere. Doing so would create huge economic challenges, produce significant volumes of carbon emissions - due to the need to create new buildings and infrastructure - and lead to development on green field sites. Therefore, there must be a more nuanced approach to managing flooding than simply prohibiting development or redevelopment in such sites.

One location our members are particularly concerned about if the catchment approach is applied rigorously is central Glasgow, which is set on 3 or 4 flood plains. If such an approach was taken it could hamper efforts to redevelop parts of Scotland's largest city, particularly along the Clyde, where there has been a significant effort to improve the area's amenity to the community and businesses.

On flood mapping, while it is a useful tool for understanding flood risk, it can also lack the nuance needed to deal with complex developments and, inherently, mapping will not take into account technical solutions that developers and public authorities could implement to enable development.

With this complexity in mind, it is imperative that flooding is addressed at a strategic level to future proof our cities and communities most at risk. These initiatives need to show ambition and vision if we are not to label swathes of our towns and cities as undevelopable, with the serious knock-on effects that this would have for our local economies and national prosperity. In agreeing that a high emissions scenario should be considered, this should also trigger a step change in the ambition of the Scottish Government to actively plan for the worst-case impacts of climate change.

Our Vision

5 Climate Change is expected to increase flooding significantly in the future. It is important that people and communities remain safe and able to adapt to new conditions. With this in mind, to what extent do you agree with our vision: Scotland's people and places are resilient to flooding?

Disagree

6 What actions can you or your organisation take to support us deliver our vision?

Actions:

The Scottish Property Federation works with its members to support a diverse, successful and sustainable property industry and represents a number of organisations from across the sector. By bringing these businesses and organisations together, we can offer a channel into the property industry and offer front-line perspectives on the investment landscape and the practicalities of developing commercial and residential real estate during the climate emergency. We are also able to share information with our members quickly and efficiently.

Further context to our answer to Question 5 - Climate Change is expected to increase flooding significantly in the future. It is important that people and communities remain safe and able to adapt to new conditions. With this in mind, to what extent do you agree with our vision: Scotland's people and places are resilient to flooding?

We are particularly pleased to see an emphasis on building effective partnerships and enabling successful and sustainable places as two of the four key elements of the vision. However, on partnerships, the vision does not emphasise the need to build these with the private sector and those that are carrying out development activity. The vision instead focuses on other government agencies and public sector organisations. As the risk of flooding increases, the importance of engaging effectively with all stakeholders throughout the development process and in decision making is vital. We feel that more priority should be given to engaging with those delivering new developments and opportunities in Scotland.

We are also concerned about the vision's inclusion of the statement that 'we [SEPA] will work with other agencies to create a resilient Scotland that avoids development in flood risk areas'. We believe that this approach is overly simplistic and negates the ability for flood risk to be abated and that technical solutions exist in many cases. This is particularly salient when looking at the possibility of flooding in the next century, as it is clear that measures will have to be taken before then to protect existing buildings and communities if the worst-case climate change scenario comes to fruition.

It should also be noted that commercial property development is a long-term investment, and it is not in any of our members' interests to see their assets flooded or the value of these assets reduced by the threat of flooding. Therefore, finding a sustainable and future-proof solution to managing flood risk is in the best interests of the development industry in Scotland.

Communicating Flood Risk

7 Our flood maps are important tools for communicating flood risk. What areas of improvement would increase your confidence and capability in using the maps for decision-making? Please rank options 1-6 - 1 = high priority 6 = low priority.

Areas of improvement flood maps - Ease of access (how you find it online):

4

Areas of improvement flood maps - Usability (how easy is it to use):

5

Areas of improvement flood maps - Ease of understanding (how clear its purpose is):

2

Areas of improvement flood maps - Accuracy and resolution:

1

Areas of improvement flood maps - Accessibility for people with disabilities or impairments:

6

Areas of improvement flood maps - Self-service one-stop shop for flood risk data:

3

Building Resilient Communities

8 We aim to support the development of great places to live and work that are adapted to a future with increased flood risk. How can we help communities, especially the most disadvantaged become more resilient e.g. provide information for Home Reports, improved flood warnings, engaging with communities?

How can we help communities become more resilient?:

Working with communities to develop strategies to manage and find technical solutions to flooding will be incredibly important to supporting the development of great places to live and work and to ensuring that every town and city has the ability to reap the economic benefits that new projects generate.

The Fraser of Allender Institute found that commercial property activity helps to support around 49,000 direct full time equivalent jobs in Scotland and a further 43,000 jobs as a result of spill-over effects. It was also found that every £100m increase in final demand for commercial new work is estimated to raise an additional £73m from indirect and induced effects across the Scottish economy. Access to these opportunities should not be determined by flood risk alone where that risk can be managed.

It is vital that there is a long-term and ambitious strategy to ensure that all communities affected by the heightened risk of flooding are not left behind by blanket restrictions on new development or re-development in their localities. There must be a focus on ensuring that technical solutions are found to enable appropriate development in such sites.

Improving Our Flood Warning Service

9 Our Flood Warning Development Framework (2017-2021) sets out our current commitments to develop our flood forecasting and warning service. Going beyond 2021, what should be our priorities to improve our service for people and communities in Scotland? Please rank options 1-4. 1 = high priority 4 = low priority

Priorities to improve service for people and communities - Expand our coverage of local (community level) flood warnings:

4

Priorities to improve service for people and communities - Improve the accuracy and extend the lead time of our existing service:

2

Priorities to improve service for people and communities - Provide more information digitally and all in one place (for example observed rainfall, observed water levels and forecast water levels):

3

Priorities to improve service for people and communities - Engage more with local communities to explain our service and support the development of local resilience groups:

1

Other:

With regard to question 7, we view all of the options as a high priority and we therefore found the question format to be restrictive for respondents.