

PE1720/C

Scottish Land and Estates submission of 2 August 2019

Scottish Land & Estates is the voice of rural businesses throughout Scotland. We are a membership-based organisation representing a wide range of rural businesses, including farmers, foresters, tourism operators, housing providers, leisure companies, and renewable energy providers.

Our members provide a wide range of economic, environmental and social benefits which are vital to the success and survival of communities throughout rural Scotland. They play a critical role in ensuring sustainable, healthy and empowered rural communities, providing housing, employment and a wide range of economic, environmental and social benefits.

PE1720: Natural Flood Alleviation Strategy for Scotland

Petition PE1720 calls on the Scottish Parliament to urge the Scottish Government to develop a natural flood alleviation strategy under the Flood Risk Management (Scotland) Act 2009.

Under the Flood Risk Management (Scotland) Act 2009 there is no specific requirement for Scottish Ministers to produce a natural flood alleviation strategy. For this to be included a change in primary legislation may be required. However, the Act does require flood risk management plans to be created. As part of their One Planet Prosperity regulatory strategy SEPA are creating a Flooding Strategy which will feed into the 14 flood risk management strategies and 14 local flood risk management plans. Included within these plans there is consideration of possible Natural Flood Management measures. SEPA are in the process of engaging with stakeholders on the content of the Flooding Strategy before holding a wider public consultation. SEPA Flooding strategy is expected to launch in 2020. This consultation creates a good opportunity to further include natural flood management as part of the solution.

SEPA's role in flooding includes flood forecasting and warning, strategic flood risk management and is a statutory consultee in the Planning process. SEPA have three types of responsibility:

- **Forecasting & Warning:** Delivery of Scotland's flood forecasting and warning service, civil contingency responder Flood Guidance Statements and public-facing Floodline direct warning service.
- **Knowledge Transfer:** Provision of evidence and advice including national flood risk assessments, flood mapping and flood risk management strategies.

- Advice: Providing flood risk advice in the land use planning process, to partners, other agencies and the public.

There is already broad consideration for Natural Flood Management across Scotland with several regional projects being supported. This additional work includes:

- SEPA Natural Flood Management Handbook:
<https://www.sepa.org.uk/media/163560/sepa-natural-flood-management-handbook1.pdf>.
- The James Hutton Institute has helped establish the Natural Flood Management network: <https://www.nfm.scot/>.
- SRUC have produced an NFM guide for farmers:
<https://www.sruc.ac.uk/NaturalFloodMgmt>.
- The Tweed Forum has been leading the way in trialling NFM measures in the Eddleston Water <https://tweedforum.org/our-work/projects/the-eddlestone-water-project/>.
- Section 20 of the Flood Risk Management Act put a duty on SEPA to assess the possible contribution of natural flood management to manage flood risks. As a result of this requirement, SEPA has produced Natural Flood Management opportunity maps:
https://www.sepa.org.uk/media/163412/natural_flood_management_guidance.pdf.

Considering the list above we cannot support the assertion of the petition that there has not been much consideration given to flood management. The efforts suggested already being embraced and implemented by land managers including; tree planting, inserting logs strategically to slow the flow of the river, re-meandering rivers to increase holding capacity. Land managers can play a significant role in keeping water upstream for longer and reducing flooding risk providing guidance and investment is available. The promotion of practical interventions and the policy tools to enable their implementation will determine how successful these efforts will be. Scottish Government currently has schemes such as the Scottish Rural Development Programme and Forestry Grants Scheme which could do more to support such activity in a coherent way.

The petition has a strong focus on beaver reintroduction as the main way of alleviating flooding, rather than this being about flood alleviation with beavers as one of many options. It is true that beavers modify the environment in ways similar to other Natural Flood Management measures, however, the wider impact of beavers in

the environment must be considered. Relying on beavers to deliver natural flood management assumes that their activity can be predicted, managed and will have no negative impacts. This is not the case. Their behaviour in building dams cannot be predicted and the impacts of a poorly placed dam can be costly.

The petition also states that “Any loss of agricultural productivity should be minor, in fact it may increase with lower level farmland subjected to less flooding”. This can only be achieved with proper planning and modelling to ensure appropriate action is being taken.

SLE is very supportive of encouraging natural flood management and it is clear that land managers will be a key part of any solutions. Natural flood management activities will be different for each area and it is important that activities suit the area and avoid detrimental impacts on businesses, communities and land managers. Although we’re supportive of flood alleviation, the focus of that within this petition seems to be at the potential expense of some farms and seems to be a vehicle to drive more beaver reintroduction. We are concerned that this determination for driving beaver reintroduction misses the nuances around natural flood management and suitable activity for each river catchment.