

## SEPA Flooding Services Strategy

### Overview

#### General Comments

In general we support the overall vision and approach of the Flooding Strategy which aligns with Scottish Government and Scottish Water strategic plans and ambitions. Scottish Water aims to transform how we work to provide water and wastewater services - and to enable the Scottish economy to prosper.

### Detailed Response

#### Specific Comments

Scottish Water welcomes a focus on the development of surface water flood forecasting to support community resilience. Surface water is identified in the NFRA2 as the greatest significant source of flood risk in Scotland. It is, therefore, essential to prioritise the development of improved warning systems, to give communities as much advance warning as possible to prepare for flooding.

In our view the Strategy document may benefit from a number of further clarifications regarding terminology and the implementation of proposed actions, as a number of these are reliant on action by other organisations. We have provided an annotated copy of the Strategy to the SEPA Flood Risk Management Team for consideration.

### FIRST THREE QUESTIONS REQUEST CONTACT INFORMATION

4	<b>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?</b>
<b>YES</b> It is appropriate to provide a “worst case” scenario for planning purposes, along with a range of other scenarios for context. This approach does, however, require the appropriate caveats due to the high level of uncertainty in projections, particularly for the further future horizons (e.g. 2100). It is important that the appropriate guidance and communication for a range of audiences is provided to increase understanding of how to use these scenarios.	
5	<b>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?</b>
<b>Strongly agree</b>	
6	<b>What actions can you or your organisation take to support us deliver our vision?</b>

Scottish Water will continue to work collaboratively with SEPA as per current working practices and requirements under the Flood Risk Management Act. This includes the sharing of data and information and working together for the good of Scotland.

We are keen to develop closer partnerships in complex areas of urban flooding and have begun to develop this approach through the Strategic Growth Agreement project with SEPA in Aberdeen and the Edinburgh & Lothian Strategic drainage Partnership. We would also encourage SEPA to use NFMAG contacts to ensure the wider representation of other organisations in partnerships at a regional/local level (e.g. Transport Scotland, Network Rail etc.).

We are keen to share knowledge and experience, specifically with regards to improving the development of the next iteration of national pluvial flood risk maps and the future development of surface water flood warning systems. We see this as a critical step forward in supporting community resilience.

We would also offer to help SEPA include a clearer requirement to link land use planning decisions with surface water flood risk, as the document explicitly focuses on floodplains. We would also support investigation into whether more could be done to influence development in areas of high pluvial 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 where 1 = high priority 6 = low priority.**

[completion of this part is required]

1. Ease of access (how you find it online) 5
2. Usability (how easy is it to use) 4
3. Ease of understanding (how clear its purpose is) 2
4. Accuracy and resolution 1
5. Accessibility for people with disabilities or impairments 6
6. Self-service one-stop shop for flood risk data 3

**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?**

Scottish Water would support further development in surface water flood warning systems, as there is currently very little locally relevant information. Current flood warnings are based on river and coastal catchment areas and are very broad geographically. Surface water flood risk has been identified as the main source of risk for Scotland by the NFRA2. Increasing the relevance of local surface water flooding would be extremely beneficial in helping to prepare communities for potential flooding.

Scottish Water would welcome increased engagement by SEPA post flooding events by eg attending community council meetings and communicating post-flood event analysis. This can help share an understanding of why flooding has happened and

the show the likelihood of similar, repeat events. It is good for communities/councillors to hear this information from an “impartial” voice, rather than just the local authority or Scottish Water who may be perceived to have a vested interest.

It is Scottish Water’s view that the communication of clear and consistent messaging to communities is something that SEPA should consider developing as part of the overall Flooding Strategy; particularly with regard to informing communities about how they can increase their personal resilience, and along with providing clear information in the aftermath of flood events.

9	<p><b>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?</b></p> <p><b>Please rank options 1-4 where 1 = high priority 4 = low priority.</b></p>
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1. Expand our coverage of local (community level) flood warnings **1**
2. Improve the accuracy and extend the lead time of our existing service **2**
3. Provide more information digitally and all in one place (for example observed rainfall, observed water levels and forecast water levels) **4**
4. Engage more with local communities to explain our service and support the development of local resilience groups **3**

- Other – please provide comment

Improvement of surface water flood forecasting to provide locally relevant information to communities is required

- End of Document -