

Chapter 7 : Flood Risk Management

<p>Information required by the Act regarding the issue addressed in this section</p>	<p>Town and Country Planning (Scotland) Act 1997 as amended: Section 15(5)(a):</p> <ul style="list-style-type: none"> the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district. <p>Town and Country Planning (Development Planning) (Scotland) Regulations 2023: Regulation 9 requires the LDP to have regard to:</p> <ul style="list-style-type: none"> the national marine plan any regional marine plan any river basin management plan; any flood risk management plan; and any local flood risk management plan 		
<p>NPF4 LDP Requirements</p>	<p>NPF4 Policy 22:</p> <ul style="list-style-type: none"> LDPs should strengthen community resilience to the current and future impacts of climate change by avoiding development in areas at risk as a first principle. Resilience should also be supported by managing the need to bring previously used sites in built up areas into positive use; planning for adaptation measures; and identifying opportunities to implement improvements to the water environment through natural flood risk management and blue green infrastructure. Plans should take into account the probability of flooding from all sources and make use of relevant flood risk and river basin management plans for the area. A precautionary approach should be taken, regarding the calculated probability of flooding as a best estimate, not a precise forecast. For areas where climate change is likely to result in increased flood exposure that becomes unmanageable, consideration should be given to alternative sustainable land use. 		
<p>Links to Evidence</p>	<p>(THC087) Highland SFRA Report (THC068) Highlands Regional Coastal Change Adaptation Plan (THC088) NatureScot Chapter 7 Consultation Response (THC089) SEPA Consultation Response</p> <table border="1" data-bbox="419 1966 1433 2011"> <tr> <td data-bbox="419 1966 1169 2011">Online Resources</td> <td data-bbox="1169 1966 1433 2011">Date Accessed</td> </tr> </table>	Online Resources	Date Accessed
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Highland SFRA Map	18.08.25
Local Development Planning Guidance	18.08.25
SEPA National Flood Risk Assessment	18.08.25
Scotland River Basin Management Plan (2021-27)	20.10.25
SEPA's Flood Maps	18.08.25
Blue and Green Infrastructure Mapping	18.08.25
Highland and Argyll Local Flood Risk Management Plan	20.10.25
Findhorn, Nairn and Strathspey Local Flood Risk Management Plan	20.10.25
Dynamic Coast Future Erosion Maps	18.08.25
Geomorphic Risk Buffer	18.08.25
Coastal Zone Mapping	18.08.25
Riparian Woodland Scotland Data	20.10.25
Recommended Riparian Corridor	18.08.25
The Scottish Biodiversity Strategy to 2045	20.10.25
The National Flood Resilience Strategy	20.10.25
ClimateJust Map Tool	18.08.25
Social Flood Risk Index	20.10.25
NPF4 Flooding Policy 22 Chief Planner Letter - October 2025	20.10.25

In order to avoid repetition of content contained elsewhere within the Evidence Report, this chapter should be read in conjunction with other chapters. We recognise that there are relevant crossovers between Flood Risk Management and other topics including:

- **Chapter 4: Climate Change and Energy**
- **Chapter 5: Nature and Environment**
- **Chapter 6: Coastal Development and Aquaculture**
- **Chapter 9: Housing**
- **Chapter 11: Infrastructure**
- **Chapter 13: Design, Wellbeing, Local Living and Placemaking**

Where apparent, the Council has referenced relevant linkages between policies areas throughout the chapter.

Summary of Evidence

- 7.1 The Council considers it has undertaken thorough engagement with stakeholders for this chapter and collected sufficient evidence on the topic for the Proposed Plan development.
- 7.2 This Chapter had been produced following the Council's Strategic Flood Risk Assessment (SFRA) and should be read alongside the Highland SFRA Report **(THC087)** and the [Highland SFRA Map](#).
- 7.3 This Summary of Evidence focuses on information relating to:
- **Highland Strategic Flood Risk Assessment**
 - **River Flooding and Erosion**
 - **Coastal Flooding and Erosion**
 - **Blue and Green Infrastructure**
 - **Natural Flood Management**
 - **Climate Change**
 - **Essential Infrastructure and Development within Flood Risk Areas**
 - **NPF4 Policy 22 Chief Planner Letter**

Highland Strategic Flood Risk Assessment

- 7.4 The Highland SFRA takes the form of a two-stage process. The completed Stage 1, is high-level strategic assessment designed to be included as part of the Evidence Report includes the Highland SFRA Report **(THC087)** together with the [Highland SFRA Map](#).
- 7.5 Stage 2 will be undertaken alongside the Proposed Local Development Plan. involve a detailed site-by-site assessment of risk. Including an assessment of flood risk on specific HLDP sites, and a consideration of cumulative flood risk prepared to support the Proposed Plan.
- 7.6 Both stages of the SFRA will be prepared in line with the following guidance and best practice documents:
- Policy 10 and Policy 22 of NPF4 (Feb 2023).
 - [Local Development Planning Guidance](#) (May 2023).
 - [National Flood Risk Assessment](#) (Dec 2025).
 - All other guidance that will be used to support the SFRA production and this chapter of this Evidence Report can be found within the Highland SFRA Report (Planning policy, flood risk guidance, plans, and strategies section) **(THC087)**.

The SFRA considers various sources which are further explained in the Highland SFRA Report **(THC087)**, these include: [Scotland River Basin](#)

[Management Plan \(2021-27\)](#), [SEPA's Flood Maps](#), Highland Council's [Blue and Green Infrastructure Mapping](#), Highlands two Local Flood Risk Management Plans (LFRMP); [Highland and Argyll Local Flood Risk Management Plan & Findhorn, Nairn and Strathspey Local Flood Risk Management Plan](#), [Dynamic Coast Future Erosion Maps](#), flood history, Highland Council's Flood Incident Reports, and further flood risk policy and guidance provided by SEPA.

7.7 The Highland SFRA Report (**THC087**), reviewed by SEPA, offers a strategic and spatial overview of flood risk in Highland. The Highland SFRA will inform the development planning processes; ensure that flood risk is considered in the formulation of the Council's spatial strategy; the identification of development allocations; and the review of land use policies, whilst contributing towards satisfying the statutory duties the Council has under the Flood Risk Management (Scotland) Act 2009.

7.8 The following list provides the information which further details of can be found within the Highland SFRA Report (**THC087**) and details the following:

- Planning policy and flood risk documents, ranging from Government guidance to national and local strategies and plans that may influence planning and flood risk in Highland.
- Relevant information on the importance of acknowledging the impacts of cumulative development on flood risk.
- Highland area in relation to flood risk, including flood protection schemes and flood study areas.
- The data and information the Council hold and the data and information not available to the Council for the Highland SFRA.
- Information on flood risk and flood risk management (FRM) including the two flood risk management plans which cover the Highland area; [Highland and Argyll Local Flood Risk Management Plan](#) and [Findhorn, Nairn and Strathspey Local Flood Risk Management Plan](#) (LFRMP).
- Highlands Potentially Vulnerable Areas (PVA's) and Target Areas (TA's).
- Highland flood hazards, including past flood events, sources of flooding and its management.
- Climate change in relation to flood risk.
- Information on the Flood Risk Assessment (FRA) procedures which will be carried out as part of Stage 2 of the Highland SFRA.
- Flood mitigation measures.

- 7.9 In addition to the detail recorded in the Highland SFRA, Scottish Government's Scotland Environment Maps – [Geomorphic Risk Buffer](#) show where places are at risk of river erosion due to waters flowing faster, or silt deposition from water flowing slower. New development should avoid these 'areas of change', as they could be at risk from being washed away or silted up.

Coastal Flooding and Erosion

- 7.10 As referred to in **Chapter 6: Coastal Development and Aquaculture**, Highland's extensive coastline has numerous instances of known locations at risk of coastal flooding and coastal erosion. Coastal erosion exacerbates flood risks by weakening natural defences and altering water quality. Issues on coastal development and coastal defences are detailed in **Chapter 6: Coastal Development and Aquaculture** and further spatial data on HLDP area coastal zone can be found on the Councils [Coastal Zone Mapping](#).
- 7.11 Coastal flooding poses the greatest danger to life and property, despite fewer properties being at risk compared to river or surface water flooding. The Highland SFRA Report (**THC087**) uses data from Dynamic Coast Maps and [SEPA's Flood Maps](#) to identify areas in Highland most at risk from coastal flooding, considering climate change impacts. Future actions to manage coastal erosion risks will be outlined in Highlands Regional Coastal Change Adaptation Plan (Regional CCAP) (**THC068**), with collaboration from key agencies. Further information on the Highland Regional CCAP can be found in **Chapter 6: Coastal Development and Aquaculture**.

Blue and Green Infrastructure

- 7.12 Opportunities to reduce run-off in urban areas by installation of blue and green infrastructure and enhance the blue and green network are recognised in **Chapter 13: Design, Wellbeing, Local Living and Placemaking** which outlines the co-benefits of blue and green infrastructure as part of broader drainage solutions, which offer access to blue and green spaces and biodiversity benefits.
- 7.13 NPF4 Policy 22 requires that development proposals must not increase surface water flood risk and should use sustainable urban drainage systems (SUDS), integrated with blue and green infrastructure. NPF4 Policy 20 further protects blue and green infrastructure for multiple functions, such as climate mitigation, flood prevention, and nature restoration. The Highland SFRA Report and

[Highland SFRA Map](#) will also be used to inform other aspects of HLDP preparation, including sections on Infrastructure First and Blue and Green Infrastructure. Further details on Highland Blue and Green Infrastructure can be found in **Chapter 13: Design, Wellbeing, Local Living and Placemaking**.

- 7.14 NPF4 emphasises surface water management as a key part of climate adaptation and flood resilience, including a requirement to manage surface water. There are forthcoming commitments under the LFRMP 2022-28 to carry out surface water management plans. The Council's Flood Risk Management Team is currently developing a Highland wide Surface Water Management Plan (SWMP). It is at a strategic level but will identify hotspots where restriction on further development or opportunities to address existing surface water opportunities through development will be sought. When finalised, the plan will be available on the Highland Council website. Hotspots can be found in the [Highland SFRA Map](#). The SWMP will be used to support the Stage 2 of the Highland SFRA, throughout the site-selection process of HLDP, in supporting not just the site itself but also the surrounding infrastructure relevant to each development site.

Natural Flood Management

- 7.15 SEPA has explored Natural Flood Management (NFM) techniques, which use natural features to manage flood risk. A key element of NFM involves managing the source and pathway of floodwaters, rather than relying solely on traditional hard engineering.
- 7.16 NFM techniques include planting woodlands, creating wetlands, restoring rivers, and creating intertidal habitats. The importance of Riparian Woodland as a tool for NFM is recognised, [Riparian Woodland Scotland Data](#) is an important tool in understanding its extent across Highland and where could benefit in improvements. In support of this the Scottish Government's Scotland Environment Maps - [Recommended Riparian Corridor](#) as incorporated into the Council's Nature Networks methodology (**THC056**) (discussed in **Chapter 5: Nature and Environment**) identifies opportunities for new woodland planting along watercourses, with buffers of 10, 15, and 30 meters depending on the watercourse size.
- 7.17 Spatially identifying a nature network with opportunities which included consideration of blue and green infrastructure will help embed flood risk management into HLDP. To identify these opportunities, a range of evidence

including relevant water environment data, open space data, natural environment data, outdoor access and active travel data will be used.

Climate Change

- 7.18 The Stage 1 SFRA is the starting point for the Council to assess the effects of climate change on flood risk across the HLDP area. This section further explains how climate change and flooding are connected, with further details on climate change discussed in **Chapter 4: Climate Change and Energy**.
- 7.19 With predicted increases in the frequency and severity of flooding events in Highland as a result of climate change, existing policies in HwLDP will require strengthening and adaptation to avoid and mitigate the associated impacts of flooding. These considerations will form a key part of the review of potential development sites.
- 7.20 The Council recognise the links between climate change, coastal erosion and all flooding sources including coastal, pluvial and fluvial flooding. This connection can be found within the [Highland SFRA Map](#). In addition, the connection between biodiversity as detailed in **Chapter 5: Nature and Environment**, and flooding are recognised. [The Scottish Biodiversity Strategy to 2045](#) supports this stating that 'Healthy biodiversity protects soil from eroding, purifies water and helps prevent and mitigate flooding'. The Council will consider necessary actions to support the mitigation of flooding, this may be possible to do so using NFM, further discussed in **Natural Flood Management**.
- 7.21 [The National Flood Resilience Strategy](#) sets out a vision for a flood resilient Scotland through to 2045 and beyond. It focuses on what Scotland needs to do to make communities more flood resilient over the coming decades. It sets out the long-term policy direction and framework for improving flood resilience, guiding principles and priority areas for action. [The National Flood Resilience Strategy](#) will therefore be closely considered within Stage 2 of the Highland SFRA site selection process, and will work in line with NPF4 Policy 22, recognising that Essential infrastructure will be an exception to development within flood risk areas if the bullet points in Policy 22a can be adequately addressed.
- 7.22 The [ClimateJust Map Tool](#) shows several indices that assist with understanding climate vulnerability to flooding in Highland:

- Neighbourhood Flood Vulnerability Index - combines five characteristics of vulnerability: susceptibility, ability to prepare, ability to respond, ability to recover, community support.
- Social Flood Risk Index- a measure of geographic flood disadvantage (i.e. where social vulnerability and exposure to flooding coincide).

- 7.23 The Social Flood Risk Index for River and Coastal (group measure) identifies neighbourhoods where large numbers of the most vulnerable people are exposed to river and coastal flooding. In Highland, coastal settlements communities are the most socially vulnerable to River and Coastal flooding:
- In the 2050, 2^oC warming scenario, areas of Merkinch and Muirtown in Inverness are at very high to extreme risk. All other areas are at low risk, below the UK mean or not exposed (i.e. very low population density).
 - Under the 4^oC scenario additional areas are estimated to experience high to extreme social flood risk of river and coastal flooding; clusters in north and south Fort William, Oban South, Ross and Cromarty North West (northwest of Laide and the A832), west Alness, Ardersier, Nairn East, and Inverness risk areas expand to coastal data zones around Inverness Central, Raigmore and Longman.
- 7.24 The Social Flood Risk Index for Surface Water (group measure) identifies neighbourhoods where large numbers of the most vulnerable people are exposed to surface flooding. Most Highland communities, in settlements, towns and Inverness city are already at high, very high, acute or extreme risk of surface flooding, which intensifies in future climate change scenarios (2^oC or 4^oC) to 2050. This includes: Ullapool, Portree, Kyle of Lochalsh, Oban, Ballachulish and Glencoe, Kinlochleven, Fort William, Grantown-on-Spey, Nairn, Ardersier, Muir of Ord, Beauly, Dingwall, Connon Bridge, Alness, Invergordon, Tain, Balintore, Dornoch, Golspie, Brora, large portions of Caithness, Wick and Thurso, and Inverness in clusters concentrated around central Inverness, Merkinch, Muirtown, Dalneigh, Hilton, Raigmore, Ballifeary.
- 7.25 HLDP will use the Councils Surface Water Management Plan and other sources to reduce communities' vulnerability to surface water flooding.

Essential Infrastructure and Development within Flood Risk Areas

- 7.26 Essential infrastructure as defined in NPF4 is only an exception to development within an area of flood risk, as explained in NPF4 Policy 22 (a)i.) *where the*

location is required for operational reasons. Therefore, any essential infrastructure including: digital communications infrastructure; telecommunications infrastructure; all forms of renewable, low-carbon and zero emission technologies for electricity generation and distribution and transmission electricity grid networks and primary sub stations; water and waste water infrastructure; and transport proposals and travel networks will be exempt from these development restrictions if the bullet points in Policy 22a can be adequately addressed. Additionally, even although an exception to Policy 22 may apply, the first principle should still be to avoid areas at risk of flooding.

- 7.27 Owing to the scale of national and strategic projects underway in Highland, there are many instances where such exemptions apply. In all other instances development will be determined in accordance with SEPA's Vulnerable Use Hierarchy within its [SEPA Flood Risk and Land Use Vulnerability Guidance](#). This applies to the building and requirements for safe access and egress.
- 7.28 In recognition of the Highland housing challenge further discussed in **Chapter 9: Housing**, pressure to deliver substantial numbers of homes may prove challenging when delivering out with flood risk areas.

NPF4 Policy 22 Chief Planner Letter

- 7.29 [NPF4 Flooding Policy 22 Chief Planner Letter - October 2025](#) replaces the letter previously published on 11 June 2025 to accommodate changes that have been made to improve clarity around NPF4 Policy 22. This letter clarifies the differing roles and responsibilities of SEPA and planning authorities in the application of NPF4 Policy 22, as well as the responsibilities of the Scottish Government where applications are notified to Ministers on flood risk grounds and clarifies certain procedural matters and to highlight a range of new and updated advice on flooding matters published by SEPA.
- 7.30 Where SEPA is consulted through planning application processes, it will provide advice accordingly to the planning authority in its role as a statutory consultee. The Planning Authority must consider SEPA's advice, alongside all other relevant NPF4 and local development plan policies and material considerations, before reaching a decision.
- 7.31 The Development Management Regulations ('the DMR') set out the circumstances in which consultation with SEPA is required on planning applications. For flooding, this is where the development 'is likely to result in a

material increase in the number of buildings at risk of being damaged by flooding.'

- 7.32 For developments where the only potential source of flood risk is from a small watercourse, SEPA requests that the local authority first assess the proposal against any information it holds, wherever possible, to determine whether it may be at risk and therefore whether consultation with SEPA is required.

Summary of Stakeholder Engagement

- 7.33 A full breakdown of all stakeholder engagement undertaken to support the Evidence Report is provided within the Log of Engagement (**THC001**). A summary of the key stakeholder engagement activities undertaken for this chapter include:

Key Agencies and Stakeholders

- 7.34 All meetings and engagement exercises with stakeholders and key agencies are detailed within the *Log of Engagement (THC001)*. Prior to the drafting of the HLDP Evidence Report an early engagement exercise HLDP Evidence Consultation was undertaken from 31st Jan – 2nd May 2025. Responses to the HLDP Evidence Consultation (including from key agencies) are included in **THC006**. Drafts of the evidence presented in this chapter were then circulated to key agencies and other stakeholders on 21 August 2025, which included:



- SEPA
- NatureScot
- Scottish Water
- Transport Scotland
- Historic Environment Scotland
- HITRANS
- NHS Highland

- 7.35 A summary of feedback received is shown below:

- 7.36 Homes for Scotland (**THC435**) suggested minor changes to the HLDP Consultation Responses section which has now been moved to its own separate document (**THC006**), amendments to this text have been made and can be seen in (**THC006**). More in depth responses were received from NatureScot (**THC088**) and SEPA (**THC089**), summaries of which can be found below.

Key Agency: NatureScot (THC088)	
Main views raised	Confirm satisfaction with the approach taken, demonstrated in this chapter. Suggested data links to be included in chapter and between chapters. Suggested implications for development in the coastal area. Welcome that comments made in the evidence consultation have been reflected in this chapter, however, unclear how all comments have been addressed. Suggest a record of all exact comments and how these have been addressed are provided in this chapter, not just a summary. Suggest that if comments are addressed in other chapters that this is noted within this chapter.
Council's response	Noted, actions taken forward. However, an itemised table of exact comments will not be provided in the body of the Evidence Report due to the length of this kind of addition for all respondents. The Council notes that previous Gate Check outcomes have expressed a need to summarise engagement within the body of the Evidence Report and has sought to do this in the interests of brevity and consistency.
Areas of agreement	The Council agrees with the comments made; however, it cannot provide a full table of exact comments, as explained above.
Outstanding issues	No, NatureScot accept the Council's reasoning for only including a summary of comments.
Is the agency content with the evidence?	Yes, a statement of agreement has been provided (THC088) .
Implications for the proposed plan	No implications resulted from these comments.
Actions for the proposed plan stage	Data links have been included in chapter and between chapters. Suggested coastal areas implication has been considered in Chapter 6 – Coastal Development and Aquaculture .
Key Agency: SEPA (THC089)	
Main views raised	Comments on SFRA: Note that reference in NPF4 is made to "flood protection schemes" rather than "flood defence and schemes".

	<p>The “Data and information requested and received” section starting on page 14 would benefit from slight rearranging or reclarifying so it’s clearer what information is available and of that what is discounted as not useable/helpful for whatever reason.</p> <p>Suggest separation of flood protection scheme and flood study output sections with additional rewording.</p> <p>Suggest rewording of how/where information is presented spatially, to where possible the Highland SFRA will present information spatially.</p> <p>Suggest rewording of second sentence in Past Flood Events section.</p> <p>Suggest additional detail on purpose of flood protection schemes</p> <p>Comments on Chapter 7: Suggest rewording of essential infrastructure description in relation to NPF4 Policy 22a(i).</p> <p>Found duplicate paragraph to be removed.</p> <p>Rewording of sentence.</p>
Council’s response	Noted, actions taken forward.
Areas of agreement	The Council agrees with the comments that have been made and any necessary adjustments to the text have been made.
Outstanding issues	No outstanding issues.
Is the agency content with the evidence?	Yes, a statement of agreement has been provided (THC089) .
Implications for the proposed plan	The <u>Highland SFRA map</u> will be used in determining suitable sites during the site selection process.
Actions for the proposed plan stage	Use SFRA during the site selection process.
Summary of Local Place Plan Priorities	
7.37	Black Isle Local Place Plan (THC011) has identified the following priorities relating to Flood Risk Management:

- Flood/erosion protection for coastal and other settlements as appropriate by carrying out coastal flood risk assessments around the Black Isle
- The Green Freeport should take every opportunity to deliver community benefits including mitigation of predicted impacts of sea level rise.

7.38 Broadford and Strath Local Place Plan (**THC012**) has identified the following priorities relating to Flood Risk Management:

- Challenge for Broadford is climate change adaptation (increasing sea level rise and flooding risk).

7.39 Caol Local Place Plan (**THC024**) has identified the following priorities relating to Flood Risk Management:

- Residents have noted the improvements made by the Caol and Lochyside Flood Scheme pathway – yet there are small sections that are currently unfinished.
- New flood defence path ends at Mossfield and starts on shore front. This should be a complete path to ensure safety.

7.40 Dores and Essich Local Place Plan (**THC013**) has identified the following priorities relating to Flood Risk Management:

- Bridge over the burn in Dores not high enough to handle potential serious flood risk. Proposals of flood management measures need reviewed.

7.41 Duror and Kentallen Local Place Plan (**THC014**) has identified the following priorities relating to Flood Risk Management:

- The location of future housing development is a challenge. It must consider the flood risk and peat on the low-lying areas, access off the A828 and the junction with Achindarroch Road and the A828 for developments on higher ground.

7.42 Garve and District Local Place Plan (**THC016**) has identified the following priorities relating to Flood Risk Management:

- Flood mitigation for economic resilience to climate change and to improve critical infrastructure and support development of community land.
- Blackwater River creates potential for flooding and flood risk assessments may be required for some development.

7.43 Golspie Local Place Plan (**THC021**) has identified the following priorities relating to Flood Risk Management:

- Agree that an area-wide, multi-agency strategic flood management plan with all stakeholders by June 2025, to be implemented over 10 years.
- 'Greening the grey' hard flood defence and other structures to increase biodiversity and combat climate change.
- Flood protection measures, particularly through blue-green nature-based solutions to both mitigate flood risk and improve the quality and accessibility of public and recreational spaces along the shoreline.
- Add better drainage system involving multiple agency collaborations to combat flooding (run off water and debris) behind the train line.
- Explore improvement of the attenuation pond above the stackyard at Golspie tower and review drain and balancing ponds for capacity to deal with surface water drainage problems (flooding from agricultural fields running down Argo Terrace and Queen Drive).
- Resolve major flooding issue at the bridge.
- Improve Lady's Walk track to prevent damage from hill flooding/ run off.
- Consider relocation of critical facilities to higher ground to combat coastal flood and erosion risks.
- Explore 'living marine streets' retrofitting streets with sustainable urban drainage infrastructure to handle marine floodwater.
- Relocate care home as long-term plan if the Seaforth site becomes at risk of flooding.
- Strengthen ecological corridor along section of the Big Burn + add path. Consider rescuing access during extreme flood events.

7.44 Kinlochleven Local Place Plan (**THC017**) has identified the following priorities relating to Flood Risk Management:

- Increase native tree cover to reduce flooding and improve natural habitats.
- Develop community resilience plan to allow community to sustain themselves in events like the flood damage on the B863 'high road'.
- More rain and storms bringing trees down and increasing flooding, causing erosion and damage to property & infrastructure.

7.45 Lochalsh Local Place Plan (**THC018**) has identified the following priorities relating to Flood Risk Management:

- Drain Pladaig path to resolve flooding which makes the path impassable.
- Engage with relevant local public authorities on regional and national marine planning and coastal change adaptation initiatives.
- Connect with other communities who have begun tackling flood mitigation.

7.46 Nairnshire Local Place Plan (**THC023**) has identified the following priorities relating to Flood Risk Management:

- Coastal and river flooding poses significant risks to areas including The Links, the Maggot, Nairn and Nairn Dunbar Golf Course, Davidson Park and the Riverside. Developing appropriate strategies to protect these areas is complex but necessary. A balanced approach that combines infrastructure with natural solutions will be most effective. affordable solutions are needed to mitigate impacts, including improved flood defences, NFM, and comprehensive emergency planning
- Needs for Flood Risk Management studies carried out, which can then be used as evidence to lever in national funding.
- New development must improve the flood map position, using the protect, mitigate, adapt system approach.

7.47 Sleat Local Place Plan (**THC025**) has identified the following priorities relating to Flood Risk Management:

- Develop a community resilience plan to deal with outages, natural weather-related incidents and other emergencies/critical events, which describes potential risks, actions to take and key people/agencies.
- Development of a water management strategy for new builds

7.48 Torridon and Kinlochewe Local Place Plan (**THC020**) has identified the following priorities relating to Flood Risk Management.

- Recognise the challenge flood risk presents for development and implement flood prevention measures in SEPA designated flood risk area in Kinlochewe and along the coastline.
- Some potential housing development sites in Kinlochewe are constrained by flood risk. Combat with small scale developments in LDP.
- Commitment to linking planning policy to a detailed study of the impact of climate change on coastal and river areas to strengthen resilience to flood risk.

Summary of Implications for the Proposed Plan

- 7.49 This section sets out the implications for the HLDP Proposed Plan including Flood Risk and Flood Risk Management. The Highland Council considers these recommendations to be in line with NPF4 Policy 10 and Policy 22, the HwLDP, and have been informed by the analysis and outputs of evidence in this report.
- 7.50 This evidence report along with the [Highland SFRA Map](#) and Highland SFRA Report (**THC087**) have identified the issues with flooding, flood risk and flood risk management within the HLDP area, that it aims to manage and reduce. The HLDP, through its spatial strategies, will support Flood Risk and Flood Risk Management.
- 7.51 HLDP will consider the impact of the climate emergency and the most appropriate means, including the consideration of Nature-Based Solutions to protect and enhance community resilience to flood risk in the face of climate change and whether evidence on the need to develop further policy and advice is required.
- 7.52 The current HwLDP Policy 64 – Flood Risk is the core LDP policy at hand for matters relating to flood risk in Highland. It states that development proposals should avoid areas susceptible to flooding and promote sustainable flood management in compliance with SPP which has since been superseded. It also outlines the instances where an FRA will be required.
- 7.53 The current HwLDP Policy 66 – Surface Water Drainage is the core LDP policy at hand for matters relating to surface water drainage in Highland. It states that all proposed development must be drained by Sustainable Drainage Systems (SuDS) designed in accordance with The SuDS Manual (CIRIA C697) and, where appropriate, the Sewers for Scotland Manual 2nd Edition.
- 7.54 HwLDP Policy 64 and Policy 66 will require to be reviewed in preparation of HLDP, and assessment of flood risk will be a key component in subsequent site selection. It should be noted that the implications for the Proposed Plan with regards to Flood Risk and Flood Risk Management are general principles, therefore, site-specific assessments will be required with consideration given to potential for mitigation strategies such as design and layout throughout the site assessment process.
- 7.55 With predicted increases in the frequency and severity of flooding events in Highland as a result of climate change, existing policies in HwLDP will require strengthening and adaptation to avoid and mitigate the associated impacts of

flooding. These considerations will form a key part of the review of potential development sites.

- 7.56 HLDP will consider the probability of flooding from all sources and make use of relevant flood risk management plans, river basin management plans, surface water management plans, regional coastal change adaptation plan, flood protection schemes and flood studies for the area to inform land use designations using a precautionary approach.
- 7.57 There are forthcoming commitments under the LFRMP 2022-28 to carry out surface water management plans. These management plans, once finalised will support the Council in identifying a blue green network to be retained, protected and enhanced in HLDP. HLDP will, once finalised, use the Councils Surface Water Management Plan and other sources to reduce communities' vulnerability to surface water flooding.
- 7.58 Spatially identifying a nature network with opportunities which include consideration of blue and green infrastructure will help embed flood risk management into HLDP. To identify these opportunities, a range of evidence including relevant water environment data, open space data, natural environment data, outdoor access and active travel data will be used.
- 7.59 Where allocated sites have yet to commence development or are not consented, the latest flood risk information will be used to indicate whether any sites should be deallocated on flood risk grounds. This will take place at a later site-specific phase, after the Evidence Report. As HLDP is prepared, the SFRA process will be expanded to consider and report on new candidate sites for development, and any post NPF4 flood risk studies that are carried out.
- 7.60 HLDP will consider whether there are particularly vulnerable users or functions located in the future flood risk area. Where there are previously used derelict or vacant site, HLDP will need to consider whether it is desirable to bring such sites into positive use.
- 7.61 Due to the cross-boundary nature of flooding, the council will work at a catchment level to best manage flood risk for HLDP communities, working with other local authorities and stakeholders where necessary.
- 7.62 The SFRA will be used to inform the Strategic Environmental Assessment (SEA) of HLDP. The SFRA also will be used to inform other aspects of HLDP preparation, including sections on Infrastructure First and Blue and Green Infrastructure.

- 7.63 There is no comprehensive record of SuDS within the HLDP area, the Council will consider if there is a need and benefit for this spatial data to be recorded.
- 7.64 Further explained in the Highland SFRA Report, an FRA will be undertaken where, for HLDP sites, the SFRA shows flood risk to the site or where development may increase flood risk elsewhere. HLDP will set out any requirements for an FRA to be undertaken. However, the primary aim in the first instance is to avoid development in flood risk areas, using the most up to date SEPA maps available.

Statements of Agreement / Dispute

Agreement on Evidence

- 7.65 Agencies who responded and agreed with the evidence and content presented included:
- NatureScot (THC088).
 - SEPA (THC089).

Disputes with Stakeholders

- 7.66 No disputes were raised by respondents, small amendments that were made have been updated in this chapter and statement of agreements were provided by these agencies.

Information Gaps

- 7.67 It is considered that Highland Council's Area Place Plans would be informative evidence sources of relevance, yet it is acknowledged that some remain in production at the time of writing. Place Plans once approved will be considered in the production of the LDP if timeously available.
- 7.68 It is considered that community-led Local Place Plans would be informative evidence sources of relevance, and several are understood to remain in production at the time of writing. To date, 14 communities in Highland have formally registered Local Place Plans. Any Local Place Plans registered will be considered in the production of the LDP if timeously available.
- 7.69 One limitation that will be common to all SFRA's is that flood risk information is ever evolving, and therefore a snapshot in time used for an SFRA will in time become out of date. However, all spatial information is provided in a dynamic

GIS map, therefore ensuring the SFRA is able to be updated as new information emerges.

- 7.70 One example of flood risk information changing is that of the Potentially Vulnerable Areas and Target Areas terminology. These names will be adjusted by SEPA in 2028 following the new cycle of flood risk management guidance. Therefore, the Council will make sure to be aware of this change and how this impacts the SFRA for future developments across HLDP area in relation to flood risk.
- 7.71 There is no current record of SuDS within the HLDP area, the council will consider if there is a need and benefit for this spatial data to be recorded.

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