

[REDACTED]

From: [REDACTED] >
Sent: 29 July 2021 15:02
To: localplan
Cc: [REDACTED]
Subject: 1768 SEPA response to Proposed Plan Policies
Attachments: 1768 SEPA response to PP Policies.pdf

CAUTION: External Email

PUBLIC

1768- SEPA response to Proposed Plan policies.

Thank you for consulting SEPA on the above proposal. Please find our response attached.

Where applicable this email has been copied to the agent and/or applicant; any relevant responses to the points we raise should be sent to the planning authority.

Information on our planning service along with guidance for planning authorities, developers and any other interested party is available on our website at <https://www.sepa.org.uk/environment/land/planning/>.

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Kind regards

Jess Taylor
Planning Officer
Planning Service
SEPA Stirling Office, Strathallan House, Castle Business Park, Stirling FK9 4TZ
[REDACTED]
[REDACTED]

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Dh'fhaodadh gum bi am fiosrachadh sa phost-d seo agus ceanglachan sam bith a tha na chois dìomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom

fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an cois a' phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh arithist.

Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu postmaster@sepa.org.uk.

Oifis chlàraichte: Taigh Srath Alain, Pàirc Gnothachais a' Chaisteil, Sruighlea FK9 4TZ. Fo Achd Riaghladh nan Cumhachdan Rannsachaidh 2000, dh'fhaodadh gun tèid an siostam puist-d aig SEPA a sgrùdadh bho àm gu àm.

Charles Johnston
Scottish Borders Council
Planning & Economic Development
Council Headquarters
Newtown St Boswells Melrose TD6 0SA

If telephoning ask for:
Jess Taylor

29 July 2020

By email only to: localplans@scotborders.gov.uk

Dear Mr Johnston

**Town and Country Planning (Scotland) Acts
Scottish Borders Proposed Local Development Plan
Vol 1 - Policies**

Thank you for attending the MS Teams Triage meeting on the 25 June 2021, where we discussed our approach to the Local Development Plan (LDP).

Please find below SEPA's response to the Scottish Borders Council (SBC) Proposed Local Development Plan (PP), Volume 1 – Policies. Our response to Volume 2 – Settlements has been provided separately.

As you know, SEPA was subject to a serious cyberattack on Christmas eve, and most of our data and functions have been lost. You can find more information about this at www.sepa.org.uk. This is the reason why we have not been able to meet the consultation deadline of the 25 January 2021.

1. Introduction

- 1.1 SEPA made detailed comments at MIR stage (PCS/162251 dated 31st January 2019). These comments will not be replicated in the below response however we would highlight that this response should be read in conjunction with our previous comments.
- 1.2 We have produced the following Development Plan Guidance Notes and associated background papers which set our requirements and recommendations for development plans by topic area. These Guidance Notes have been used as the basis of our previous responses, and the background to our comments below.
 - [Flood risk](#) supported by the [land use planning background paper on flood risk](#)
 - [Water Environment](#) supported by the [water environment background paper](#)
 - [Sustainable Resource Use](#) supported by the land use planning background papers on [zero waste](#), [heat networks and district heating](#), and [renewable energy](#)
 - [Soils](#)
 - [Air Quality and co-location](#)

- 1.3 At MIR stage, we set out a number of requirements and recommendations relating to policy wording. These are summarised in Table 1 below. It is disappointing that the majority of these have not been incorporated into the Proposed Plan.
- 1.4 SEPA additionally set out a number of policy requirements, as set out in Table 1 and Sections 2 and 3 below. We highlighted at MIR stage that any unresolved requests for policy coverage, site removal or developer requirements would result in an objection/modification request at the Proposed Plan Stage.

Table 1 : Summary Policy Representations

Policy	Policy Title	Nature of Representation	Further Comments
PMD1	Sustainability	We support the retention of this policy	
PMD2	Quality Standards	We recommend a modification to this policy	<p>We support the retention of this policy</p> <p>We welcome the reference to active and sustainable travel modes in the Accessibility Section.</p> <p>We question the removal of reference to District Heating in section a) of this policy relating to energy and resource use minimisation and sustainable construction and would recommend that the Council ensures adequate policy coverage is given to District Heating and Heat Networks. Further detail and justification is provided in our response to Policy ED9 below.</p>
PMD3	Land Use Allocations	We support the retention of this policy	
PMD4	Development Adjoining Development Boundaries	We support the retention of this policy	
PMD5	Infill Development	We support the retention of this policy	
ED1	Protection of Business and Industrial Land	We recommend a modification to this policy	<p>We support the retention of this policy and note the modifications included. Our comments at MIR stage highlighted the importance of environmental considerations, especially flood risk, when allowing more flexibility in terms of supported uses. Proposed policy wording is not cognisant of the issues with regard to flood risk and particular use types. It is important to consider sensitivity of use in line with our land use vulnerability guidance. We therefore recommend a modification to the policy to take account of environmental considerations, in particular flood risk. We would also recommend that Policy IS8 Flood Risk is included in the list of cross-referenced policies.</p>

Policy	Policy Title	Nature of Representation	Further Comments
ED2	Employment uses outwith Business and Industrial Land	We have no comments on this policy	
ED3	Town Centres and Shopping Development	We have no comments on this policy	
ED4	Core Activity Areas in Town Centres	We have no comments on this policy	
ED5	Regeneration	We have no comments on this policy	
ED6	Digital Connectivity	We have no comments on this policy	
ED7	Business, Tourism and Leisure Development in the Countryside	We recommend a modification to this policy.	We note that proposals for holiday lodges/chalets will be considered against this policy rather than policy ED8 as was proposed as MIR stage. It is important to consider sensitivity of use in line with our land use vulnerability guidance. We would highlight that holiday chalet/lodges would fall under the Most Vulnerable Use category. We therefore recommend a modification to the policy to take account of environmental considerations, in particular flood risk. We would also recommend that Policy IS8 Flood Risk is included in the list of cross-referenced policies.
ED8	Caravan and Camping Sites	We support the principle of the policy	We are of the view, as expressed at MIR stage, that due to the increase in chalet applications across the country, the inclusion of chalet accommodation in Policy ED8 would be appropriate. However we note that these types of accommodation will now be considered against ED7 and have provided comments in relation to this above.
ED9	Renewable Energy Development	We require a modification to this policy.	Please refer to detailed comments below.

Policy	Policy Title	Nature of Representation	Further Comments
ED10	Protection of Agricultural Land and Carbon Rich Soils	We recommend a modification to this policy.	The Development Plan Guidance Notes (Soils) referenced at the beginning of the document also contains a number of references and guidance which we would recommend signposting to as part of the policy text to ensure it remains up to date as possible prior to publication and adoption.
ED11	Safeguarding of Mineral Deposits	We support the retention of this policy	
ED12	Mineral and Coal Extraction	We support the retention of this policy	We support the retention of this policy and welcome the reference to a presumption against peat extraction and other development likely to have an adverse effect on peatland and/or carbon rich soils within class 1 and 2 peatland areas.
HD1	Affordable and Special Needs Housing	We have no comments on this policy	
HD2	Housing in the Countryside	We support the retention of this policy	
HD3	Protection of Residential Amenity	We support the expansion of this policy	
HD4	Meeting the Housing Land Requirement/Further Housing Land Safeguarding	We support the retention and minor amendments to this policy	
HD5	Care and Retirement Homes	We support the retention of this policy	
EP1	International Nature Conservation Sites and Protected Species	We have no comments on this policy	
EP2	National Nature Conservation and Protected Species	We have no comments on this policy	
EP3	Local Biodiversity	We have no comments on this policy	

Policy	Policy Title	Nature of Representation	Further Comments
EP4	National Scenic Areas	We have no comments on this policy	
EP5	Special Landscape Areas	We have no comments on this policy	
EP6	Countryside Around Towns	We have no comments on this policy	
EP7	Listed Buildings	We have no comments on this policy	
EP8	Archaeology	We have no comments on this policy	
EP9	Conservation Areas	We have no comments on this policy	
EP10	Gardens and Designed Landscapes	We have no comments on this policy	
EP11	Protection of Greenspace	We have no comments on this policy	
EP12	Green Networks	We support the retention of this policy	
EP13	Trees, Woodlands and Hedgerows	We have no comments on this policy	
EP14	Coastline	We have no comments on this policy	
EP15	Development Affecting the Water Environment	We support the inclusion of this policy	
EP16	Air Quality	We support the inclusion of this policy	
IS1	Public Infrastructure and Local Service Provision	We support the retention of this policy	
IS2	Developer Contributions	We support the inclusion of this policy	

Policy	Policy Title	Nature of Representation	Further Comments
IS3	Developer Contributions Related to the Borders Railway	We have no comments on this policy	
IS4	Transport Development and Infrastructure	We have no comments on this policy	
IS5	Protection of Access Routes	We have no comments on this policy	
IS6	Road Adoption Standards	We have no comments on this policy	
IS7	Parking Provision and Standards	We have no comments on this policy	
IS8	Flooding	We require modifications to this policy	Please refer to detailed comments below
IS9	Waste Water Treatment Standards and Sustainable Urban Drainage	We support the retention of this policy and minor amendments	
IS10	Waste Management Facilities	We support the retention of this policy	
IS11	Hazardous Developments	We support the retention of this policy	
IS12	Development Within Exclusion Zones	We have no comments on this policy	
IS13	Contaminated Land	We have no comments on this policy	
IS14	Crematorium Provision	We have no comments on this policy	
IS15	Radio Telecommunications	We have no comments on this policy	
IS16	Advertisements	We have no comments on this policy	

Policy	Policy Title	Nature of Representation	Further Comments
IS17	Education Safeguarding	We have no comments on this policy	
IS18	Cemetery Provision	We support the inclusion of this policy and welcome the reference to SEPA policy and guidance within the policy wording.	

2. ED9 Renewable Energy Development

2.1 At MIR stage we set out three **requirements** relating to low carbon energy distribution and district heating networks. It does not appear that any of these requirements have been incorporated into the proposed plan. Therefore, in line with our [Development Plan Guidance on Sustainable Resource Use and Energy](#) we require the following **modifications** to the Proposed Plan:

- I. We **require** that further specific information is included in the text of Policy ED9 which supports the construction of low carbon energy distribution, district heating networks. Alternatively it may be preferable to draft a new policy in the forthcoming plan which specifically outlines the Council's support and information requirements for district heating proposals.
- II. We **require** this policy (as an insertion to Policy ED9 or new policy) to outline a requirement for substantial new development, such as a new town or sizeable development to connect to an existing or proposed district heating network, or provide a heat network within the site.
- III. We also **require** text within the policy format of LDP2 which identifies that new developments located adjacent to existing or proposed new heat networks or heat supplies should be designed to be capable of connecting to the heat supply. This could include incorporating space to be safeguarded for future pipework/piperuns within developments, incorporating grass/green corridors along footpaths or roads which could be excavated for installing heat network pipes without significant disturbance, and ensuring the new infrastructure does not obstruct the development of planned heat network and district heating systems.
- IV. We also note that in policy **PMD2** the previous reference to District Heating Schemes within the policy wording has been removed and would **strongly encourage** the Council to reinstate this reference within the policy wording.

2.2 We note that the Renewable Energy Supplementary Guidance and background text to the policy does provide some coverage of these matters, but we are of the view that, in order to anchor the policy commitment for such networks, the Council's support and requirements in relation to District Heating and Heat Networks must be embedded within the relevant policy wording.

Justification

- 2.3 It is acknowledged that due to the scale, form and type of development within the Scottish Borders area, that developments of this scale which would be considered to be “substantial”, may not occur regularly. Substantial developments may consist of new towns, urban extensions, large regeneration areas or large development sites subject to master planning. There is, however, an element of judgment that will need to be applied by the Council and it might be that some sites offer significant potential for heat networks due their location, support from the local authority and ‘buy in’ from developers. In order to meet the energy efficiency requirements and targets set by the Scottish Government, as outlined below, renewable energy generated needs to be used by new developments. Developments that are planned for now will have long lasting environmental and carbon impacts, and efforts must be made to ensure that the energy and heat demands of new developments are consistent with the Scottish Government’s ambitions and targets. The reduction of heat and energy demands will make substantial steps towards delivering these ambitions, but the way the remaining heat and energy is generated and delivered also has a role to play.
- 2.4 In order to deliver the Scottish Government’s ambitions for 1.5tw of heat demand delivered by district or communal heating and for 40,000 homes to be heated through heat networks, new developments need to be designed to incorporate district heating. Where substantial new developments are planned, the opportunity arises for providing a heat network within the site and for this to be required and designed in at the earliest stages. New developments have a role to play in not only establishing and creating these networks, but also in connecting to networks to make use of heat that is being captured. As set out in the consultation draft Scottish Government **Heat in Buildings Strategy 2021**, existing domestic buildings are accountable for 15% of Scotland’s total greenhouse gas emissions and non-domestic buildings are responsible for 6% of Scotland’s total greenhouse gas emissions. It is critical for emerging LDP policy to support development of decarbonised heat and energy systems to contribute towards meeting the objectives of Scottish Government for net zero emissions of all greenhouse gases by 2045 (75% by 2030). Energy efficiency will be a significant contributor to this, but the design of new developments to incorporate low and zero carbon heat will also be important.
- 2.5 In addition to this, the Scottish Government has stated in the **2019 Programme for Government** their commitment to develop regulations so that new homes consented from 2024 are required to use renewable or low carbon energy heat, and phasing in similar regulations from 2024 for non-domestic buildings. This is further strengthened by the proposed **New Build Heat Standards**, scoping consultation closed 3 March 2021 but providing a clear direction from the Scottish Government regarding their optimised outcomes for decarbonisation and the use of heating systems which produce zero direct emissions at point of use, which sets out that district heating and heat networks offer an opportunity to meet this proposed standard.
- 2.6 The Proposed Local Development Plan identifies planning policy and allocations for sites that will be developed beyond 2024, and it is therefore imperative that the LDP policy accurately reflects the extant and emerging Scottish Government position relating to heat and energy.
- 2.7 Furthermore, paragraph 154 of Scottish Planning Policy (SPP) states that the planning system should support the transformational change to a low carbon economy consistent with national objectives and targets including deriving 11 % of non-electrical heat demand from renewable sources by 2020. Paragraph 159 of SPP goes on to advocate that Local

Development Plans should support the development of heat networks in as many locations as possible even where these may be initially reliant on carbon-based fuels if there is potential to convert them to low carbon fuels in the future. Maximising the use of existing waste heat sources should always be explored and heat mapping used to co-locate developments with a high heat demand with sources of heat supply (paragraph 158).

- 2.8 Paragraph 159 of SPP also states that LDPs should specifically identify appropriate locations for the development of heat networks/storage/energy centres and include heat policies that support the implementation of this approach

3. IS8 Flooding

- 3.1 We welcome the framework provided by this policy, and we are pleased to note that the policy is strengthened by the inclusion an overarching statement that promotes the avoidance of flood risk. This precautionary approach is supported by SPP and the Flood Risk Management (Scotland) Act 2009. We have previously requested in our response to the 2014 Proposed Plan consultation that the Policy IS8 be modified to state clearly that development on the functional flood plain should be avoided and we acknowledge that the policy does state that development should be located away from them.
- 3.2 We are also pleased to note that the policy includes a statement about avoidance of flood risk as a first principle.
- 3.3 At MIR stage we noted two **requirements** and two **recommendations** relating to Policy IS8. It does not appear that any of these requirements have been incorporated into the proposed plan. Therefore, in line with our [Development Plan Flood Risk Guidance](#) we require the following **modifications** to the Proposed Plan:
- I. We **require** that the wording under Policy IS8 a) is **modified** from “essential civil infrastructure” to “civil infrastructure” and the development described such as hospitals, fire stations, schools and care homes, be separated from the development described as ground-based electrical and telecommunications equipment which is “essential infrastructure.”
 - II. We **require** that the policy identifies that a precautionary approach should be taken to proposed allocations in areas protected by a formal flood protection scheme. The categories of development allocation would generally be acceptable when protected by an existing or planned formal flood protection scheme within a built up area are outlined in our [Development Plan Flood Risk Guidance](#). It is recommended that any allocated site protected by a formal scheme is built to a water resilient design and has adequate evacuation procedures in place that are appropriate to the level of risk and use. We are happy to discuss policy wording with Scottish Borders Council.
 - III. We would reiterate our **recommendation** from our 2014 Proposed Plan response and our 2019 MIR response that paragraph one is amended to clarify what is meant by significant flood risk (we note that the second paragraph highlights the 0.5% probability, but we consider that this should be explained in the first paragraph). In accordance with the risk framework in Scottish Planning Policy this should include flooding up to and including a 1 in 200 year flood event.
 - IV. We **recommend** that the role of sustainable flood risk management should be recognised in the context of sustainable placemaking and blue/green infrastructure as part of the policy text. This includes the policy framework for sustainable placemaking and blue/ green

infrastructure and the identification of existing and creation of new blue/green infrastructure in the spatial strategy.

Justification

- 3.4 Essential infrastructure can be located in areas where the flood risk is greater than 0.5% annual probability, however civil infrastructure will never be acceptable in these locations. We are happy to discuss the wording for the policy to ensure that this is clear and we refer you to our [Land Use Vulnerability Guidance](#) which sets out a framework to assist the assessment of vulnerability of different types of land use to the impact of flooding. This is based on the risk framework in SPP (para 263) and classifies the relative vulnerability of land uses into five groups from most vulnerable uses to water compatible uses. This could be included to ensure that flood risk vulnerability of the proposed land use is appropriate for the location and degree of flood risk to the site. For example, in flood risk areas less vulnerable land uses such as commercial or industrial should be favoured over residential use (especially on the ground floor). This is supported by the Scottish Governments online [planning advice on flood risk](#) and is a principle promoted in the Flood Risk Management Act 2009 in relation to reducing overall flood risk (duties placed on local authorities in Section 1 of the Act).
- 3.5 Planning authorities have a duty under The Planning etc. (Scotland) Act 2006, to ensure that development plans contribute to sustainable development. The Flood Risk Management (Scotland) Act 2009 also places a duty on SEPA and local authorities to reduce overall flood risk and promote sustainable flood risk management when exercising their flood risk related functions. As highlighted in the Scottish Governments online [planning advice on flood risk](#) (para 21), flood protection schemes can reduce flood risk but they cannot eliminate it entirely. The level of protection offered by a scheme will depend upon a number of factors including the design standard, the design life and condition of the infrastructure. Breaching or overtopping of flood defences is often unexpected and can lead to swift inundation of the protected area resulting in more damaging floods. Water trapped behind defences following a flood can also lead to greater overall damage.
- 3.6 Ensuring that development behind flood protection schemes is an appropriate land use for the location and designed to be resilient contributes to the delivery of sustainable flood risk management by reducing the number of sensitive receptors exposed to risk if the defences are breached or overtopped. This is particularly important if the flood protection scheme is not designed to offer protection during a 0.5% annual probability flood event.
- 3.7 In accordance with Scottish Planning Policy (para 256), development should not have a significant probability of being affected by flooding or increase flood risk elsewhere. To comply with this policy requirement, any development permitted behind a planned formal flood protection scheme should not be built until the defences are operational. This will ensure that people and property are not exposed to unnecessary flood risk and comply with principles of sustainable flood management.
- 3.8 Flooding can impact on people and property and will increase in some parts of the country as a result of climate change. Planning can play an important part in reducing the vulnerability of existing and future development to flooding (SPP, para 254). Increasing the resilience of development to changes in climate contributes to sustainable development, in accordance with planning authorities duties under The Planning etc. (Scotland) Act 2006. Supporting climate change adaptation is also included as a high-level principle that guides sustainable development (SPP, para 29). In particular, local authorities have a duty under the Climate Change (Scotland) Act 2009 to contribute to the delivery of the Climate Change

Adaptation Programme (May 2014). This programme identifies the integration of climate change adaptation into planning processes and decisions as a strategic principle. Ensuring that the vulnerability of the land use is appropriate for the location and degree of flood risk is also an adaptation measure that will help make future development resilient to a changing climate.

- 3.9 To ensure that people are safe and minimise damage to property, development in areas that may be at risk of flooding should be designed and constructed to maximise resilience. This requirement is reflected in the flood risk framework (SPP, para 263) which states that where built development is permitted, measures to manage flood risk will be required. Where appropriate, this includes the use of water resilient materials and construction.
- 3.10 These comments should also be read in conjunction with our comments in Policy ED1 Protection of Business and Industrial Land (previously Policy ED1 Protection of Employment Land) with regard to the comments we made regarding consideration of complementary uses.

I trust the above is of assistance. Please contact me if you wish to discuss further.

Yours sincerely

Jess Taylor
Planning Officer
Planning Service

Disclaimer

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our [website planning pages](#).

Connolly, Trish

From: [REDACTED] >
Sent: 15 July 2021 20:25
To: localplan
Cc: [REDACTED]
Subject: Scottish Borders Proposed Plan Vol 2 Settlements SEPA Response
Attachments: SBC PP sites Final response SEPA 1561.pdf

CAUTION: External Email

OFFICIAL – BUSINESS

Charles,

Please find attached SEPA response to the Scottish Borders Proposed Plan Vol 2 Settlements.

Please do not hesitate to contact me for any clarification/questions.

Regards

Silvia Cagnoni
Senior Planning Officer
Scottish Environment Protection Agency

At present I can only respond to agreed business critical work. Please use the link below for further information.

□

[Planning | Scottish Environment Protection Agency \(SEPA\)](#)

Planning Service status A sophisticated criminal cyber-attack has had a major impact on the way SEPA works. We are working through all the services that we provide to understand what we need to do in the short and longer term to res services.

www.sepa.org.uk

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Dh'fhaodadh gum bi am fiosrachadh sa phost-d seo agus ceanglachan sam bith a tha na chois diomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom

fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an chois a' phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh arithist.

Our ref: 1561

Your ref: Proposed Plan



Charles Johnston
Scottish Borders Council
Planning & Economic Development
Council Headquarters
Newtown St Boswells
Melrose
TD6 0SA

If telephoning ask for:

Silvia Cagnoni

15 July 2021

By email only to: localplans@scotborders.gov.uk

Dear Mr Johnston

Town and Country Planning (Scotland) Acts
Scottish Borders Proposed Local Development Plan
Vol 2 - Settlements

Thank you for attending the MS Teams Triage meeting on the 25 June 2021, where we discussed our approach to the Local Development Plan (LDP).

Please find below SEPA's response to the Scottish Borders Council (SBC) Proposed Local Development Plan (PP), Volume 2, related to the settlements. Our response to Volume 1 – Policies, will be provided separately.

As you know, SEPA was subject to a serious cyberattack on Christmas eve, and most of our data and functions have been lost. You can find more information about this in www.sepa.org.uk. This is the reason why we have not been able to meet the consultation deadline of the 25 January 2021.

Fortunately, we have been able to retrieve some of the work that our hydrologists had previously started on the allocations and have therefore been able to provide representations on the developer requirements in relation to flood risk.

Please find in Appendix 1 the following sections, including our LDP representations:

1. Sites we require to be removed from the plan (4).
2. Sites for which we require a modification to the developer requirement, asking for a Flood Risk Assessment, further flood risk investigation or text changes (61).
3. Sites for which the developer requirement already considers flood risk but for which we recommend a modification to be more specific (32).
4. Sites for which we do not require modifications to the developer requirement, but for which we have additional information that the Council may find useful (157).

Please do not hesitate to contact me should you need any clarification before then, by email to planning.se@sepa.org.uk .

Your sincerely

Silvia Cagnoni
Senior Planning Officer
Planning Service

APPENDIX 1

1. Sites for removal

Based on the information we hold, this site is at significant risk of flooding and is not suitable for development. We consider avoidance the most sustainable option and recommend that the sites are removed from the plan.

Further detail is provided in the following paragraphs.

Caveats & Additional information for the Planning Authority

Due to the ongoing Cyber Attack, our advice is based on the current (limited) information which is accessible to us. Our responses are therefore provided in the absence of some of our historic flood information, flood defence assets, flood studies and site history.

Policy Context

Planning authorities have a duty under The Planning etc. (Scotland) Act 2006 to ensure that development plans contribute to sustainable development. The Town and Country Planning (Scotland) Act 1997 is also designated as relevant function responsible for the delivery of the Water Environment Water Services (Scotland) Act 2003; which thereby places a duty on planning authorities to promote sustainable flood management. The avoidance of flood risk, by not locating development in areas at risk of flooding is recognised as a key part of delivering sustainable flood risk management which positively contributes to the creation of sustainable places.

In accordance with paragraph 255 of SPP the planning system should take a precautionary approach to flood risk and promote flood avoidance. Development plans should therefore safeguard flood storage and conveyance capacity and direct development away from functional flood plains and medium to high flood risk areas (SPP, para 255). This includes identifying major areas of the flood plain and storage capacity which should be protected from inappropriate development (SPP, para 261).

In particular, paragraph 256 of SPP specifically states that development which would have a significant probability of being affected by flooding should not be permitted. This principle is reflected in the risk framework (SPP, para 263) which states that medium to high risk areas are generally not suitable for additional development in undeveloped and sparsely developed areas. In built up areas certain developments may only be suitable behind formal flood protection schemes which are designed to an appropriate standard.

SEPA and your authority also have duties under the Flood Risk Management (Scotland) Act 2009 to work towards reducing overall flood risk, act in the way best calculated to manage flood risk in a sustainable way and promote sustainable flood management. The cornerstone of sustainable flood management is avoidance of development in areas at risk of flooding.

As these allocations are contrary to the statutory and policy framework for flood risk management we require that they are removed from the LDP. If your authority wants to allocate this site contrary to this advice, we will be willing to review our position if a detailed Flood Risk Assessment (FRA) is undertaken to establish the principle of development. It should be accepted that the findings of a FRA may confirm that the site is not suitable for development. We therefore reserve our right to object to the principle of development at the planning application stage.

EC2 - Caddonhaugh, ClovenfordsExecutive Summary Outlining Policy Context

Due to the site being in a sparsely developed area, within the functional floodplain, and a proposed increase in sensitivity from no classification to residential, we do not consider that it meets with the requirements of Scottish Planning Policy and our position is unlikely to change. We have a shared duty with Scottish Ministers and other responsible authorities under the Flood Risk Management (Scotland) Act 2009 to reduce overall flood risk and promote sustainable flood risk management. The cornerstone of sustainable flood risk management is the avoidance of flood risk in the first instance. Therefore, we require that this site is removed from the Local Development Plan.

Technical Appendix

We previously recommended the removal of this site during the LDP consultation process. Unfortunately, due to the recent cyber-attack we are unable to access our previous response to this allocation site.

Review of the SEPA Flood Map shows that the site boundary of EC2 lies within the estimated 1 in 200 year functional floodplain of the Caddon Water. In addition, there is a small watercourse flowing along the eastern boundary which appears to be culverted just upstream of the site boundary. Due to our limited historical information following the cyber attack our records indicate that Clovenfords has been at risk from both pluvial and fluvial flooding with records in 1990, 1992, 2007 and 2012.

In 2012 we commented on application 12/00672/FUL. We maintained our objection to the proposed development as we were not satisfied that the Flood Risk Assessment (FRA) undertaken in 2005 was to an appropriate standard as this did not include detailed hydraulic modelling of the Caddon Water or Meigle Burn. It was deemed that the site was entirely at flood risk and there were notes of significant bank erosion within the 2005 FRA. However, based on the information available to us at this time it was proposed that land raising would be required to ensure the proposed development was outwith the functional floodplain and compensatory storage should be provided. We stated that any updated FRA may only confirm the site is at significant risk and therefore, unsuitable for development.

We commented on another application in 2013, planning reference 13/00252/AMC. Our responses were similar to that in 2012 for application 12/00672/FUL. It is stated within our response, dated 20 May 2013 that if the site were a renewal of planning permission, and if the site was not an extant planning permission, we would be likely to object in principle to the development due to the potential flood risk associated with this site.

We would highlight these previous applications included land raising and the provision of compensatory storage. The compensatory storage was proposed to be within the functional floodplain. We would note that we are unable to support any land raising within the functional floodplain, regardless if compensatory storage is provided.

The housing allocation for 6 units would be an increase in sensitivity from no classification to residential within the functional floodplain. Development in this area would add to the overall area at risk and would therefore be contrary to the policy principles of Scottish Planning Policy and the aspirations of the Flood Risk Management (Scotland) Act.

SPEEB005 - Peebles East (South of the river)Executive Summary Outlining Policy Context

Given the location of the proposed site within the undeveloped/sparsely developed area functional floodplain we do not consider that it meets with the requirements of Scottish Planning Policy and our position is unlikely to change. We have a shared duty with Scottish Ministers and other responsible authorities under the Flood Risk Management (Scotland) Act 2009 to reduce overall flood risk and promote sustainable flood risk management. The cornerstone of sustainable flood risk management is the

avoidance of flood risk in the first instance.
removed from the Local Development Plan.

Therefore, we require that this site is

Technical Appendix

We previously provided comments on this site during the LDP consultation process and recommended removal of the site north east of the B7062 (previously allocation BPEEB011).

Review of the SEPA Flood Map shows that the majority of site SPEEB005 lies within the estimated 1 in 200-year functional floodplain of the Haystoun Burn and the River Tweed. Peebles Flood Study (Mott MacDonald & JBA, 2017) included hydraulic modelling of the Haystoun Burn and River Tweed and corroborates that most of the site is located within the 1 in 200-year functional floodplain.

SEPA Objected in Principle to application 17/00606/PPP and stated that we do not believe there is a sustainable flood risk solution to enable residential development at this location. Our position has not changed.

Scottish Planning Policy (paragraph 263) states that in medium to high risk areas (greater than 0.5% annual probability of coastal or watercourse flooding); *“May be suitable for residential, institutional, commercial and industrial development within built-up areas provided flood protection measures to the appropriate standard already exist and are maintained, are under construction, or are a planned measure in a current flood risk management plan”*. We consider this site to be within a sparsely developed area and based on the risk framework, these areas are generally not suitable for additional development unless a location is essential for operational reasons. In addition, the site is not currently, or planned, to be protected by a flood prevention scheme.

Contrary to the LDP recommendations, we would advise against the provision of a Flood Risk Assessment, given the availability of a detailed Peebles Flood Study (Mott MacDonald & JBA, 2017) which already demonstrates the significant flood hazard at this site.

In summary, site SPEEB005 is in a sparsely developed area, entirely within the functional floodplain and the allocation of the site for mixed use, including housing and potential new school development would be an increase in sensitivity from no classification to Highly Vulnerable Use and Most Vulnerable Use, respectively. Development in this area would add to the overall area at risk and would therefore be contrary to the policy principles of Scottish Planning Policy and the aspirations of the Flood Risk Management (Scotland) Act.

ASELK040 - Philiphaugh Mill, Selkirk Housing allocation

In our MIR response we asked for this site to be removed, but we note that this has not been done and the site is in the Proposed Plan.

Executive Summary Outlining Policy Context

Due to the site being in a sparsely developed area and a proposed increase in land use vulnerability from commercial to residential, we do not consider that it meets with the requirements of Scottish Planning Policy and our position is unlikely to change. We have a shared duty with Scottish Ministers and other responsible authorities under the Flood Risk Management (Scotland) Act 2009 to reduce overall flood risk and promote sustainable flood risk management. The cornerstone of sustainable flood risk management is the avoidance of flood risk in the first instance. Therefore, we recommend that this site is removed from the Local Development Plan.

Technical Appendix

We previously recommended the removal of this site during the LDP consultation process in February 2014, July 2016, November 2017 and January 2019. Prior to the 2008 Local Plan, SEPA had indicated that the site was unsuitable for residential development. Therefore, SEPA has always had a consistent

view regarding this site. We attended a meeting with Scottish Borders Council representatives in November 2015 to discuss the Scottish Government Reporter findings. The Reporter had agreed with SEPA and recommended removal of this allocation. The 2013 Proposed Plan which was adopted in May 2016, included the Philiphaugh Mill redevelopment site, which was contrary to SEPA's and the Scottish Governments Reporter's recommendations. The previous Proposed Plan made no mention of flood risk within the Site Requirements. The Site Requirements did state that "The Redevelopment opportunity at Philiphaugh Mill is for housing use". As part of the November 2015 meeting, SBC pointed out that for the site at Philiphaugh Mill (then zRO200) SEPA could have objected to the housing part of the proposal rather than ask for the removal of the site. The allocation is consistently being promoted as housing and as such the council have not altered the land use.

Review of the SEPA Flood Map shows that the entire site boundary of ASELK040 lies entirely within the estimated 1 in 200 year functional floodplain of the Ettrick Water. In addition, there is a mill lade which flows through the site which poses an additional flood risk to the site.

The Ettrick Water has a well documented history of flooding. It is also well documented that the site flooded on the 31st of October 1977 in the book "Troubled Waters – Recalling the Floods of '77". *"At the top of Ettrickhaugh Road, Kendal Fish Farm was flooded out and subsequently many thousands of rainbow trout were released into the river. The following day was a boom time for the local anglers". "Many houses in Ettrickhaugh Road, opposite Selkirk RFC, had to be abandoned and the only escape route for one unfortunate man trapped upstairs in the rugby club premises was via a rowing boat! A short distance away, the swollen waters meant the loss of 70,000 rainbow trout from Kendal Fish Farm, valued at £20,000."* Philip Edgar, the former manager at Kendal Fish Farm is quoted as saying *"A couple of thousand fish were lost from the farm. It was mainly the big fish that got washed away into people's gardens and the rugby pitch – they were everywhere"*. The site is also within the flood envelope of the 1977 flood as produced by Crouch & Hogg on behalf of Borders Regional Council.

SEPA acknowledge that the Selkirk Flood Prevention Scheme (FPS) will reduce the risk of flooding to Selkirk, including to site ASELK040 Philiphaugh Mill. However, the primary purpose of a flood protection scheme is to protect existing development from flooding rather than to facilitate new development.

The latest development planning and development management guidance published by SEPA states that a precautionary approach, i.e. avoidance, should be taken to proposed allocations in areas protected by a flood protection scheme. We would stress that defences can be breached or overtopped leading to a scenario that can be significantly worse than if there are no defences present. Flooding can be sudden, unexpected and floodwater trapped behind defences can extend the period of inundation which can lead to greater damage. FPSs have a finite design life, which may be less than that of the proposed and future development.

Scottish Planning Policy (paragraph 263) states that in medium to high risk areas (greater than 0.5% annual probability of coastal or watercourse flooding); *"May be suitable for residential, institutional, commercial and industrial development within built-up areas provided flood protection measures to the appropriate standard already exist and are maintained, are under construction, or are a planned measure in a current flood risk management plan."*

Paragraph 263 also states that generally medium to high risk areas are not suitable for *" additional development in undeveloped and sparsely developed areas, unless a location is essential for operational reasons, e.g. for navigation and water-based recreation, agriculture, transport or utilities infrastructure (which should be designed and constructed to be operational during floods and not impede water flow), and an alternative, lower risk location is not available;"*

In summary, the housing allocation for 19 units is in a sparsely developed area i.e. the periphery of settlement boundary, predominantly surrounded by undeveloped land. The proposed development would be an increase in vulnerability from commercial to residential. The location is not essential for operational reasons and there are alternative, lower risk locations available. Residential development in this area would increase overall flood risk and would therefore be contrary to the policy principles of Scottish Planning Policy and the aspirations of the Flood Risk Management (Scotland) Act. However, we would be supportive of redevelopment of the site for a similar commercial use.

EY5B - Minchmoor Road East,

Yarrowford

Executive Summary Outlining Policy Context

Due to the site being in a sparsely developed area, entirely within the functional floodplain, and a proposed increase in land use vulnerability from greenfield to residential, we do not consider that it meets with the requirements of Scottish Planning Policy and our position is unlikely to change. We have a shared duty with Scottish Ministers and other responsible authorities under the Flood Risk Management (Scotland) Act 2009 to reduce overall flood risk and promote sustainable flood risk management. The cornerstone of sustainable flood risk management is the avoidance of flood risk in the first instance. Therefore, we require that this site is removed from the Local Development Plan.

Technical Appendix

Review of the SEPA Flood Map shows that the entire site boundary of EY5B lies within the 1 in 200 year functional floodplain of the Yarrow Water, to the south of the proposed development. In addition, the Gruntly Burn which flows to the east of the site, may also contribute to flood risk at the site.

Directly south of the site it was reported within the book "Troubled Waters, recalling the floods of '77" that the house was surrounded by floodwaters. We also hold records of flooding within Broadmeadows from 1998, 2003, 2002 and 2012. There is a report available from the flooding around the Selkirk area in 2003. This report includes photographs of the Broadmeadow area and can be found here:

<https://rmets.onlinelibrary.wiley.com/doi/abs/10.1256/wea/74/06> These flood events were from the watercourses flowing off the steep hills to the north causing rapid inundation. Due to the current Cyber Attack we are unable to give detailed historical event information.

Scottish Planning Policy (paragraph 263) states that in medium to high risk areas (greater than 0.5% annual probability of coastal or watercourse flooding); *"May be suitable for residential, institutional, commercial and industrial development within built-up areas provided flood protection measures to the appropriate standard already exist and are maintained, are under construction, or are a planned measure in a current flood risk management plan."* We consider this site to be within a sparsely developed area and based on the risk framework, these areas are generally not suitable for additional development unless a location is essential for operational reasons. In addition, the site is not currently, or planned, to be protected by a flood prevention scheme.

In summary, the housing allocation for 5 units is in a sparsely developed area, entirely within the functional floodplain based on SEPA Flood Maps. The proposed development would constitute an increase in land use vulnerability from greenfield to residential development in a flood risk area. Contrary to the LDP recommendations, based on the information available we note that the provision of a Flood Risk Assessment may only to serve to confirm the site is at risk of flooding.

Development in this area would represent an overall increase in vulnerability within the functional floodplain and reduction in floodplain volume, which would be contrary to the principles of Scottish Planning Policy and the Flood Risk Management (Scotland) Act.

2. Sites where we require a modification to the developer requirement to ask for a Flood Risk Assessment or flood risk investigation.

Sites in Table 2 below are located in or adjacent to the functional flood plain or an area potentially at flood risk from any source. We therefore require that a development requirement is attached to these sites for a Flood Risk Assessment to be undertaken prior to any development occurring on the site and that the findings are used to inform the scale, layout and form of development. This is necessary to ensure that development is avoided within areas at medium to high risk (unless they accord with the risk framework in paragraph 263 of SPP) and there is safe dry pedestrian access and egress at times of flood.

The capacity of these sites to provide deliverable development land may be reduced due to flood risk and we recommend that you contact your flood prevention/management colleagues to discuss this further. Potential flood risk constraints should be taken into account when defining the number of units/ area of deliverable development land available on these sites.

If a development requirement addressing this issue is not attached to each of the sites we would object and seek a modification to the proposed plan.

Planning authorities have a duty under The Planning etc. (Scotland) Act 2006 to ensure that development plans contribute to sustainable development. The Town and Country Planning (Scotland) Act 1997 is also designated as relevant function responsible for the delivery of the Water Environment Water Services (Scotland) Act 2003; which thereby places a duty on planning authorities to promote sustainable flood management. In accordance with the principles of sustainable flood risk management the inclusion of a food risk assessment as a developer requirement will ensure that development in areas at risk of flooding is avoided. As set out in paragraph 29 of SPP it will also contribute positively to the creation of sustainable places and support climate change adaptation.

In particular, paragraph 255 of SPP advocates a precautionary approach to flood risk. It states that the planning system should promote flood avoidance by safeguarding flood storage and conveyance capacity and locate development away from functional flood plains and medium to high risk areas. The inclusion of an FRA as a site specific development requirement will ensure that flood risk is appropriately considered and directed away from medium to high flood risk areas (unless it accords with the risk framework in paragraph 263 of SPP). This requirement is supported by paragraph 266 of SPP states that an FRA may be required where factors indicate a heightened risk may be present. It will also ensure that developers are fully informed of the potential flood risk issues affecting the site that may constrain the developable area.

Table 2 – FRA/flood risk investigation required as PP developer requirement is insufficient to address flood risk issues

PP 2020 site ref	Settlement	Site Name	Modification required	Comments
AAYTO004	Ayton	Land north of High Street	FRA	We require an FRA which assesses the risk from the small watercourse adjacent to the site.

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TB200	Broughton	Dreva Road	FRA	We require an FRA which assesses the risk from the small watercourses which flow along the perimeter of the site. Majority of site is likely to be developable. Consideration should be given to whether there are any culverted watercourses within the site. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage. Broughton Flood Study undertaken 2018 may provide additional information.
zEL43	Broughton	Former Station Yard	FRA	There is no mention of flood risk in the Proposed Plan. We would support similar/ less sensitive development of this site in line with our land use vulnerability guidance. We would not support residential development at this site. We would require an FRA to assess the risk from the Biggar Water and small watercourse which flows along the perimeter of the site. We would require evidence to show there would be no increase in flood risk elsewhere to enable development. Broughton Flood Study undertaken 2018 may provide additional information.
BCL2B	Coldingham	Bogangreen	FRA	The Proposed Plan refers to the Planning Brief, which says that a FRA would not be required. We disagree. We require an FRA which assesses the risk from the Hill Burn and Bogan Bum which flow along the perimeters of the site. Consideration should be given to whether there are any culverted watercourses within the site. There is a culvert along the Hill Burn that will need to be taken into account in any FRA.
BCOLD001	Coldstream	Lennel Mount North	FRA	There is no mention of flood risk in the Proposed Plan. A FRA is required. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues adjacent or encroaching onto the northern perimeter of the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer for more information on surface water.
ACRAI001	Crailing	Crailing Toll	FRA	We require an FRA which assesses the risk from the small watercourse which potentially is culverted within or adjacent to the site. Information should also be provided relating site levels to historic flood levels in the Teviot.
BD200	Duns	Langton Edge	FRA	We require an FRA which assesses the risk from the Pouterlynie Burn which flows along the southern boundary. There is a record of flooding in 2000 at Longformacus Road. No further information on source.

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BD20B	Duns	Bridgend II	investigation	Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues to the north of the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
RDUNS003	Duns	Disused Chicken Hatchery, Clockmill	FRA	We require an FRA which assesses the risk from the small watercourse which flows along the western and southern boundaries of the site. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage. Consideration should be given to whether there are any culverted watercourses within/ near the site.
zEL26	Duns	Berwick Road 2020 GIS calls this Cheeklaw	FRA	There is no mention of flood risk in the Proposed Plan. We require an FRA which assesses the risk from the small watercourse which flows along the northern and western boundaries of the site. Also review of the surface water 1 in 200 year flood map shows that there may be flooding issues on the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Consideration should be given to whether there are any culverted watercourses within/ near the site.
BEARL002	Earlston	Townhead	FRA	We require an FRA which assesses the risk from the small watercourses which flow along the boundary of the site. There is a Flood Protection Scheme (FPS) downstream of this reach but it offers a limited standard of protection. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage. Consideration should be given to whether there are any culverted watercourses within/ near the site. Earlston Flood Study 2017 may provide additional information.
zEL56	Earlston	Station Road	FRA	We require an FRA which assesses the risk from the Turford Burn. The FRA is required to inform the area of redevelopment, type of development, and finished floor levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere. Development will likely be constrained due to flood risk. Earlston Flood Study 2017 may provide additional information.

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zEL57	Earlston	Mill Road	FRA	We require an FRA which assesses the risk from the Leader Water. The FRA is required to inform the area of redevelopment, type of development, and finished floor levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere. Development may be heavily constrained due to flood risk. Earlston Flood Study 2017 may provide additional information.
TE6B	Eddleston	Burnside	FRA	We note that a FRA is mentioned in the Planning Brief. We require an FRA which assesses the risk from the Longcote Burn and small watercourse which flows along the eastern perimeter. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage. Site will likely be constrained due to flood risk.
AEYEM006	Eyemouth	Gunsgreenhill Site C	FRA	The Planning Brief states no FRA required. We disagree and we will need FRA or, at very minimum, topographic information. We require an FRA which assesses the risk from the small watercourses which flow through and on the boundary of the site.
AEYEM007	Eyemouth	Gunsgreenhill Site B	FRA	The Planning Brief states no FRA required. We disagree and we will need FRA or at very minimum topographic information. We require an FRA which assesses the risk from the small watercourses which flow through the site.
BEY2B	Eyemouth	Acredale Farm Cottages	FRA	We have commented on part of this site. Part was built without SEPA consultation. For any further development we require a detailed FRA which assesses the risk from the North Burn. We would not support any further development which increases the flood risk to existing/proposed development. Any further development will likely be heavily constrained as a result of the current development.
AGALA024	Galashiels	Easter Langlee expansion area	FRA	We require an FRA which assesses the risk from the small watercourse which flows through the western side of the allocation. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.

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BGALA002	Galashiels	Galafoot	FRA	As this allocation is for business/industry we require an FRA which assesses the flood risk from the Gala and Tweed. The FRA is required to inform the area of redevelopment, type of development, and finished floor levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. We would not support any development which increases the flood risk to existing/proposed development. Any further development will likely be heavily constrained as a result of the current development. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues on the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
EGL13B	Galashiels	Crotchetknowe	investigation	<i>There is a pond upstream but no evidence there is a small watercourse through the site. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.</i>
EGL17B	Galashiels	Buckholm Corner	FRA	We require an FRA which assesses the risk from the small watercourse which flows through the site. Consideration will need to be given to bridge and culvert structures within and adjacent to the site. We do not support development over culverts that are to remain active. Review of the surface water 1 in 200 year flood map and steep topography nearby indicates that there may be flooding issues within this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Site will need careful design to ensure there is no increase in flood risk elsewhere and proposed housing is not affected by surface runoff.
EGL19B	Galashiels	Mossilee	investigation	<i>Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage. There is a small watercourse part culverted downhill of the site. Historic maps indicate that the Lint Burn may be culverted through or adjacent to the site. Buildings must not be constructed over an existing drain (including a field drain) that is to remain active. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention</i>

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EGL32B	Galashiels	Ryehaugh	FRA	We require an FRA which assesses the risk from the Gala Water and the small watercourse which flows along the eastern boundary. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage. There is also a mill lade (disused) along the southern boundary which will require investigation
EGL41	Galashiels	Buckholm North	investigation	<i>Although we cannot find any evidence on historic maps, there may be a culverted watercourse through the site. Buildings must not be constructed over an existing drain (including a field drain) that is to remain active. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. We request basic further information in the form of a culvert survey to determine the presence/location/condition of a culverted watercourse through the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.</i>
EGL43	Galashiels	Balmoral Avenue	FRA	We require an FRA which assesses the risk from Mossilee Burn which flows along the boundary of the site. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
RGALA001	Galashiels	St Aidans Church	FRA	The Proposed Plan says that an FRA may be required. We do require one. We require an FRA to assess the risk from the Mossilee Burn. The updated SEPA Floodmap indicates a flow path along Livingstone Place, St Andrews Street and St John Street.
RGALA002	Galashiels	Vacant Buildings at Kirk Brae	FRA	FRA required. There is a small watercourse shown to be located on the opposite side of the road to the development. We would recommend that flood resistant/resilient materials are considered during the construction
zCR3	Galashiels	Stirling Street	FRA	We require an FRA which assesses the risk from the Gala Water. In addition, review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.

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zED2	Galashiels	Heriot Watt University-Netherdale campus	FRA	As the allocation is for education safeguarding we require an FRA which assesses the risk from the Gala Water. The FRA is required to inform the area of redevelopment, type of development, and finished floor levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. We would not support any development which increases the flood risk to existing/proposed development.
AGREE009	Greenlaw	Poultry Farm	FRA	Should the layout or land-use differ from what was previously agreed we would require an FRA which assesses the risk from the Blackadder Water and small watercourse along the eastern boundary. Due to the steepness of the adjacent hill slopes we would also recommend that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and infrastructure are not at increased risk of flooding.
AHAWI006	Hawick	Guthrie Drive	FRA	We require an FRA which assesses the risk from the small watercourse which flows through/adjacent to the site. Consideration should be given to any culverts/bridges nearby/ within the site which may exacerbate flooding. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
AHAWI013	Hawick	Gala Law	FRA	We require an FRA which assesses the risk from the small watercourse which flows along the boundary of the site. Consideration should be given to any culverts/bridges nearby/ within the site which may exacerbate flooding. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
RHA12B	Hawick	Summerfield 1	FRA	The Planning Brief says that no FRA required. We disagree. We require an FRA which assesses the risk from the small watercourse which flows along the boundary of the site. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
RHA13B	Hawick	Summerfield 2	FRA	The Planning Brief says that no FRA required. We disagree. We require an FRA which assesses the risk from the small watercourse which flows along the boundary of the site. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
RHA25B	Hawick	Stirches 2	FRA	We require an FRA which assesses the risk from the small watercourse which flows along the boundary of the site. Consideration should be given to any culverts/bridges nearby/ within the site which may exacerbate flooding. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.

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RHAWI016	Hawick	Former N Peal Factory, Carnarvon St	FRA	A FRA is required to inform the area of redevelopment, type of development, access/ egress, and finished floor levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere. Development may be heavily constrained due to flood risk. Investigation of potential lade structures beneath the site should be considered. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage. We would recommend consideration is given to the inclusion of flood resistant/resilient materials included in the design.
zEL49	Hawick	Burnfoot	FRA	We require an FRA which assesses the risk from the River Teviot and Boonraw Burn. A FRA is required to inform the area of redevelopment, type of development, and finished floor levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
zEL51	Hawick	Loch Park Road	investigation	<i>We recommend to contact the flood protection officer. A FRA is not required but surface water needs to be considered. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.</i>
zEL52	Hawick	Liddesdale Road	FRA	We require an FRA which assesses the risk from the Slitrig Water and any potential mill lades flowing through or adjacent to the site. Any nearby bridges should also be considered as the Slitrig has mobilised large amounts of woody debris in the past.

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TI200	Innerleithen	Kirklands / Willowbank	FRA	<p>Should the application change from previously agreed we would require an FRA which assesses the risk from the small watercourses, mill lade, and interaction with the Leithen Water. This should take into account all our latest guidance.</p> <p>Consideration will need to be given to any culverts/ bridges which may exacerbate flood risk. Review of the surface water 1 in 200 year flood map and steep topography indicates that there may be flooding issues at this site or immediately adjacent. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Site will need careful design to ensure there is no increase in flood risk elsewhere and proposed housing is not affected by surface runoff. Site will likely be constrained due to flood risk.</p>
RJ27D	Jedburgh	Wildcat Cleuch	FRA	<p>Small watercourse flows along western boundary and is culverted beneath Wildcat Cleugh road and should be assessed within any FRA.</p>
zEL33	Jedburgh	Edinburgh Road	FRA	<p>As the area is at significant flood risk, it is essential that any new development will have a neutral impact on flood risk. We would only support redevelopment of a similar use in line with our land use vulnerability guidance. The FRA is required to inform the area of redevelopment, type of development, finished floor levels and ensure that the development has a neutral impact on flood risk. Furthermore flood resilient and resistant materials should be used.</p>
zEL34	Jedburgh	Bankend South Industrial Estate	FRA	<p>As the area is at significant flood risk, it is essential that any new development will have a neutral impact on flood risk. We would only support redevelopment of a similar use in line with our land use vulnerability guidance. The FRA is required to inform the area of redevelopment, type of development, finished floor levels and ensure that the development has a neutral impact on flood risk. Furthermore flood resilient and resistant materials should be used.</p>
zEL35	Jedburgh	Bongate South	FRA	<p>As the area is at significant flood risk, it is essential that any new development will have a neutral impact on flood risk. We would only support redevelopment of a similar use in line with our land use vulnerability guidance. The FRA is required to inform the area of redevelopment, type of development, finished floor levels and ensure that the development has a neutral impact on flood risk. Sensitivity of use should be considered. Furthermore, flood resilient and resistant materials should be used.</p>

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zEL37	Jedburgh	Bongate North	FRA	As the area is at significant flood risk, it is essential that any new development will have a neutral impact on flood risk. We would only support redevelopment of a similar use in line with our land use vulnerability guidance. The FRA is required to inform the area of redevelopment, type of development, finished floor levels and ensure that the development has a neutral impact on flood risk. Sensitivity of use should be considered. Furthermore, flood resilient and resistant materials should be used. SEPA maintain a gauging station adjacent to the development.
BKELS005	Kelso	Pinnaclehill Industrial Estate	FRA	Small watercourse/drain showing to be located within development site and is culverted partially through development site. FRA required to assess the risk of flooding.
zEL206	Kelso	Extension to Pinnaclehill Industrial Estate	FRA	Small watercourse flows along southern boundary. The surface water flood map picks up this low lying area.
BLAUD002	Lauder	North Lauder Industrial Estate	FRA	FRA would have to assess the risk of flooding from all sources and ensure that development has a neutral impact on flood risk and doesn't affect the flood protection scheme.
RLAUD002	Lauder	Burnmill	FRA	FRA would have to assess the risk of blockage of the culvert running below the road. Site will be significantly constraint by flooding but note only 5 houses are proposed.
zEL61	Lauder	Lauder Industrial Estate	FRA	The developer requirement needs to be modified to include a FRA requirement. Two source of flood risk. One from the flood protection scheme and the associated culvert and also the small unnamed watercourse which flows along the southern boundary of the site and is also culverted beneath the development site. Unsure whether the two culverts join beneath the site. FRA would have to be submitted if any new development.
EM32B	Melrose	Dingleton Hospital	FRA	Number of watercourses flowing through the site, some of them culverted. Any new development in this area would have to be supported by a FRA.
EM4B	Melrose	The Croft	FRA	Small watercourse flows along northern boundary. The surface water flood map picks up this low lying area. Also, another small watercourse flowing through the middle of the site. FRA would be required to assess all flood risk sources to the site.
ENT4B	Newtown St Boswells	Melrose Road	FRA	Very small portion of site shown to be at risk of flooding. Recommend that a FRA is carried out if any development within the vicinity of the flood envelope. Vast majority of site developable.

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MREST001	Reston	Auction Mart	FRA	Should the application differ from what has been previously agreed then we would object and request the submission of an updated FRA to assess the flood risk from the Briery Burn.
SREST001	Reston	Reston Longer Term 1	FRA	We will require a FRA to assess flood risk from the small watercourse which is located within the site and another small watercourse may be culverted through the site. There should be no built development over an active culvert.
zRS3	Reston	Reston Station	FRA	We will require an FRA to assess flood risk from the small watercourse which may be culverted through the site. There should be no built development over an active culvert.
AROB003	Roberton	Site adjacent to Kirk'oer	FRA	We require a FRA. A watercourse may be culverted through the site and as such this should be investigated as part of any development proposal. Buildings must not be constructed over an existing drain (including a field drain) that is to remain active. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
BSELK002	Selkirk	Riverside 5	investigation	Site is behind FPS to an appropriate standard. The surface water ponding should be discussed with the flood protection officer.
BSELK003	Selkirk	Riverside 8	investigation	Site is behind FPS to an appropriate standard. The surface water ponding should be discussed with the flood protection officer.
RSP3B	Sprouston	Teasel Bank	FRA	We will require a FRA which assesses the flood risk from the small watercourse in order to inform the design and finished floor levels. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
zEL18	West Linton	Deanfoot Road	FRA	We will require a FRA which assesses the flood risk from the small watercourse which enters a culvert adjacent to the site. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.

3. Sites where the developer requirement already considers flood risk but where we recommend a modification to be more specific.

Table 3 - PP developer requirement mentions FRA/flood risk but SEPA has additional information to be included.

PP 2020 site ref	Settlement	Site name	Are the development requirements sufficient to address flood risk issues?	MODIFICATION: recommended	Comments
ADENH001	Denholm	Denholm Hall Farm East	Y	Y	We require a FRA to assess the risk from the small watercourse along the western boundary. Consideration should be given to any culverts/bridges that may exacerbate flood risk. No built development on any active culverts. Due to the steep hill slope adjacent to the site consideration should be given to surface water runoff during site layout design. It is recommended that contact is made with the flood prevention officer.
RD4B	Denholm	Denholm Hall Farm	Y	Y	We are satisfied that the developer requirements are sufficient to address flood risk at the site. We require a FRA to assess the risk from the small watercourse along the western boundary. Consideration should be given to any culverts/bridges that may exacerbate flood risk. No built development on any active culverts. Due to the steep hill slope adjacent to the site consideration should be given to surface water runoff during site layout design. It is recommended that contact is made with the flood prevention officer.
ADUNS023	Duns	South of Earlsmeadow (Phase 1)	Y	Y	We require a modification to the text of the developer requirement to request an FRA which assesses the risk from the small watercourse. Consideration should be given to any culverts/bridges which might exacerbate flood risk. There should be no build development over an active culvert. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues on the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.

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AEARL002	Earlston	Surplus land at Earlston High School	Y	Y	We require a modification to the developer requirement with wording requiring an FRA which assesses the risk from the Turfford Burn as well as the small offtake. The FRA is required to inform the area of redevelopment, type of development, and finished floor levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere. Earlston Flood Study 2017 may provide additional information.
AEARL010	Earlston	East Turfford	Y	Y	We require a modification to the developer requirement with wording requiring an FRA which assesses the risk from the Turfford Burn and small watercourse near the site. There is a FPS downstream of this reach but it offers a limited standard of protection. The site will likely be constrained due to flood risk. Earlston Flood Study 2017 may provide additional information.
AEARL011	Earlston	Georgefield Site	Y	Y	We require a modification to the developer requirement with wording requiring an FRA which assesses the risk from the Turfford Burn and small watercourses which flow along the boundary of the site. There is a FPS downstream of this reach but it offers a limited standard of protection. The site will likely be constrained due to flood risk. Earlston Flood Study 2017 may provide additional information.
REARL001	Earlston	Halcombe Fields	Y	Y	We are satisfied with the developer requirement, however we require a modification as per the following comments. A FRA is required to inform the area of redevelopment, type of development, and finished floor levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere. Development may be heavily constrained due to flood risk. Earlston Flood Study 2017 may provide additional information.
SEARL006	Earlston	Georgefield East	Y	Y	We are satisfied with the developer requirement, however please see the following additional comments. We require an FRA which assesses the risk from the Turfford Burn and small tributaries which flows through the site. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage. Consideration should be given to whether there are any culvert/bridges near the site. Earlston Flood Study 2017 may provide additional information.

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zEL55	Earlston	Turfford Park	Y	Y	We are satisfied with the developer requirement, however please see the following additional comments. We require an FRA which assesses the risk from the Turfford Burn as well as the small offtake. The FRA is required to inform the area of redevelopment, type of development, and finished floor levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere. Development may be heavily constrained due to flood risk. Earlston Flood Study 2017 may provide additional information.
zRO12	Earlston	Brownlie Yard	Y	Y	We are satisfied with the developer requirement, however please see the following additional comments. We require an FRA which assesses the risk from the Turfford Burn and small tributaries which flows through the site. Surface water runoff from the nearby hills may be an issue. Site will likely be constrained due to flood risk. Earlston Flood Study 2017 may provide additional information.
AETTR003	Ettrick (Hopehouse)	Hopehouse West	Y	Y	We require an FRA which assesses the flood risk from the Ettrick Water, Hopehouse Burn and small watercourse which flows along the western perimeter. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
BGALA003	Galashiels	Langhaugh Business and Industrial safeguarding	Y	Y	The require the developer requirement to be more specific as follows. We require an FRA which assesses the risk from the Gala Water. In addition, review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
SGALA005	Galashiels	Hollybush Valley	Y	Y	The developer requirement says that a FRA may be required but we actually need one and investigation into culverted watercourse. There is a small watercourse adjacent to the site which may require consideration. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Potentially culverted water through site rather than adjacent to site.

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SGALA016	Galashiels	Hollybush Valley	Y	Y	The developer requirement says that a FRA may be required but we actually need one and investigation into culverted watercourse. We require an FRA which assesses the risk from Stannis Burn and small watercourses which flow through/adjacent to the site. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
zRO4	Galashiels	Plumtreehall Brae	Y	Y	The developer requirement says FRA may be required whereas we do require one. We require an FRA which assesses the risk from the Gala Water. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
zRO6	Galashiels	Roxburgh Street	Y	Y	We require a modification in the developer requirement to update the text. As the allocation is for redevelopment, we require an FRA which assesses the risk from the Gala Water, mill lade and small watercourse. The FRA is required to inform the area of redevelopment, type of development, and finished floor levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. We would not support any development which increases the flood risk to existing/proposed development. The site will likely be constrained due to flood risk.
RHAWI001	Hawick	Slitrig Crescent	Y	Y	We developer requirement asks for a FRA, however, please note the following additional comments. We require an FRA which assesses the risk from the Slitrig Water. Due to the historic records of flooding downstream exacerbated by bridge blockage, we would strongly recommend consideration is given to the inclusion of flood resistant/resilient materials included in the design. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
<i>RHAWI014</i>	<i>Hawick</i>	<i>Land on Mansfield Road</i>	Y	Y	We note that the developer requirement asks for a FRA, however we require a modification as follows. A FRA is required to inform the area of redevelopment, type of development, access/ egress, and finished floor levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere. Development may be constrained due to flood risk.

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RHAWI015	Hawick	Land East of Community Hospital	Y	Y	We note that the developer requirement asks for a FRA, however we require a modification as follows. A FRA is required to inform the area of redevelopment, type of development, access/ egress, and finished floor levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere. Development may be heavily constrained due to flood risk. Investigation of potential lade structures beneath the site should be considered.
RHAWI017	Hawick	Former Peter Scott Building	Y	Y	We note that the developer requirement asks for a FRA, however we require a modification as follows. We require an FRA which assesses the risk from the River Teviot and Slitrig Water. Redevelopment to a similar or less sensitive use would be supported by SEPA. An increase in vulnerability would only be supported if a detailed FRA can demonstrate the site is free from flood risk and there is safe access/egress available. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Site will likely be constrained due to flood risk.
RHAWI018	Hawick	Buccleuch Mill	Y	Y	We note that the developer requirement asks for a FRA, however we require a modification as follows. We require an FRA which assesses the risk from the River Teviot. Redevelopment to a similar or less sensitive use would be supported by SEPA. An increase in vulnerability would only be supported if a detailed FRA can demonstrate the site is free from flood risk and there is safe access/egress available. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Site will likely be constrained due to flood risk.

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zEL50	Hawick	Mansfield Road	Y	Y	<p>We note that a FRA is already mentioned in the developer requirement, however please note the following wording. We require an FRA which assesses the risk from the River Teviot and small watercourse which flows along the boundary of the site which may be culverted in parts. A FRA is required to inform the area of redevelopment, type of development, and finished floor levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.</p>
zEL62	Hawick	Weensland	Y	Y	<p>We note that the developer requirement asks for a FRA, however we require a modification as follows. We require an FRA which assesses the risk from the River Teviot and mill lade which flows through the site which may be culverted in parts. A FRA is required to inform the area of redevelopment, type of development, and finished floor levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere. The site will likely be heavily constrained due to flood risk. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.</p>
zRO8	Hawick	Commercial Road	Y	Y	<p>We note that the developer requirement asks for a FRA, however we require a modification as follows. We require an FRA which assesses the risk from the River Teviot and mill lades which flow through the site which may be culverted in parts/entirety (this has been flagged during previous consultations for this area). A FRA is required to inform the area of redevelopment, type of development, and finished floor levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere. The site will likely be heavily constrained due to flood risk. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.</p>

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ANEWT005	Newtown St Boswells	Newtown Expansion Area	Y	Y	We note that the developer requirement asks for a FRA, however we require a modification as follows. We require an FRA which assess the flood risk from the small watercourse along the southern boundary which may be culverted and the Bowden Burn to the north for the southern allocation site. For the northern allocation site a culverted watercourse may be through the site and further investigation is required. Consideration should be given to any culverts and bridges that may exacerbate flood risk. There should be no built development over an active culvert. Due to the steep hill slope adjacent to the site consideration should be given to surface water runoff during site layout design.
APEEB021	Peebles	Housing south of South Park	Y	Y	Settlement profile states that a FRA will be required to inform development at this site which we are satisfied with. No built development should take place on functional floodplain or over existing culverts (this should include proposed culverts as well). Edderston Burn Flood Study (2018) may provide further information to support FRA.
AREST004	Reston	Reston Long Term 2	Y	Y	We require a modification to the development requirement as follows. We require an FRA which assesses the risk from the small watercourse which potentially flows through the site. Consideration should be given to whether there are any culvert/bridges within or nearby which may exacerbate flood risk. There should be no built development over an active culvert. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
BR6	Reston	Rear of Primary School	Y	Y	We require a modification to the development requirement as follows. We will require a FRA which assesses the flood risk from the small watercourse. Consideration should be given to the downstream culvert or structure which may exacerbate flood levels. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.

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ASELK042	Selkirk	Philiphaugh Steading II	Y	Y	We require an FRA which assesses the risk from the Long Philip Burn. We are aware that significant earth works have been undertaken on this site which should be taken into account during any future assessment. Consideration will need to be given to bridges and culverts which are known to block in this area due to volume of debris that the burn can transport during high flows. Based on the information available as part of the Flood Scheme works, the site maybe constrained due to flood risk. Due to steep topography above the allocation site, consideration should be given to surface runoff issues to ensure adequate mitigation is implemented. Site will need careful design to ensure there is no increase in flood risk elsewhere and proposed housing is not affected by surface runoff.
ASTOW022	Stow	Craigend Road	Y	Y	Flood risk is mentioned in the Proposed Plan but we require a modification to the developer requirement as follows. We will require a FRA which assesses the risk of flooding from the small watercourse which is located within the eastern part of the site, south of the Craigend Road. Consideration should be given to any upstream or downstream culverts or structures. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
MSTOW001	Stow	Royal Hotel	Y	Y	We will require a FRA which assesses the risk of flooding from the Crunzie Burn. Consideration should be given to any upstream and downstream bridges and structures which may exacerbate flood levels. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
zR200	Walkerburn	Caberston Farm/Old Mill Site	Y	Y	The developer requirement asks for a FRA but we require a modification as follows. Should the application differ from what has been previously agreed then we would object and request the submission of a FRA which assesses the flood risk from the Walker Burn which flows through the site. Consideration should be given to any upstream and downstream bridges and structures which may exacerbate flood levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.

4. Sites for which we do not require modifications to the developer requirement, but for which we have additional information that the Council may find useful.

PP 2020 site ref	Settlement	Site Name	Are the development requirements sufficient to address flood risk issues?	Comments
EA200	Ashkirk	Cransfield	Y	There is a small watercourse on the opposite side of the road. There is no evidence that it flows within the site. Any surface runoff from the development should be carefully designed to ensure there is no increase downstream.
AAYTO003	Ayton	Lawfield	Y	<i>We require an FRA which assesses the risk from the small watercourse flowing through the site. Majority of site is likely to be developable.</i>
ABONC003	Bonchester Bridge	Site opposite Memorial Hall	Y	<i>The Main Issues Reports states that a FRA will be required to inform site layout, design and potential mitigation. In addition, no development should take place over existing culverts (this should include proposed culverts). We agree with this statement. A bridge adjacent to the site may exacerbate flooding at the site. MIR mentions excluding small area of flood risk from residential development. We would require a FRA to identify the extent of the 1:200 year floodplain. May constrain the number of houses on site.</i>
TB10B	Broughton	Springwell Brae	Y	Based on topographic information available, there is sufficient height difference between the allocation and the Broughton Water. Should the boundary change then we would require reconciliation. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
ABURN003	Burnmouth	Lyall Terrace II	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
MCARD006	Cardrona	North of Horsburgh Bridge	Y	<i>We are satisfied with the developer requirements. There are bridges along this reach which could potentially exacerbate flooding. Site will likely be heavily constrained due to flood risk.</i>
SCARD002	Cardrona	Land at Nether Horsburgh	Y	<i>We require an FRA which assesses the risk from the small watercourses which flow through and adjacent to the site as well as the River Tweed. Consideration will need to be given to bridge and culvert structures within and adjacent to the site which may exacerbate flood risk. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Site may be constrained due to flood risk.</i>
ACHIR003	Chirnside	Crosshill	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.

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zEL1	Chirnside	Southfield	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
zEL25	Chirnside	Berwick Road	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
EC6	Clovenfords	Clovenfords West	Y	The Planning Brief mentions requirement for FRA and therefore we are satisfied with the developer requirements. We require an FRA which assesses the risk from the Caddon Water which flows along the perimeter of the site. Site will likely be constrained due to flood risk. There are bridges/culverts along this reach which could potentially exacerbate flooding. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
BCO10B	Cockburnspath	Burnwood	Y	<i>We require an FRA which assesses the risk from the Cockburnspath Burn which flows adjacent to the site. Majority of site will likely be developable.</i>
BCO4B	Cockburnspath	Dunglass Park	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues adjacent or encroaching onto the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
ACOLD014	Coldstream	Hillview North I (Phase 2)	Y	<i>Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. In addition, the surface water flood map indicates a potential flow path which can indicate a potential small watercourse. Review of Scottish Water information and historic maps does not indicate the presence of a small watercourse. This should be explored further during site investigations.</i>
zEL27	Coldstream	Coldstream Workshops	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues on the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
zEL28	Coldstream	Hillview Industrial Estate	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues on the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
zRO17	Coldstream	Duns Road	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues on the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
ADUNS010	Duns	Todlaw Playing Fields	Y	We are satisfied that the developer requirements are sufficient to address flood risk at the site. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues to the north of the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.

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BD12B	Duns	Berrywell East	Y	The Planning Brief states that a FRA is unlikely, which is acceptable. Please note that regular flooding in west end of public park was noted by locals. this is suspected to be exacerbated by the depositing of fill material on a field to the north west in recent years.
RDUNS002	Duns	Duns Primary School	Y	Site is outwith SEPA flood Maps. Recommended that contact is made with the flood prevention officer due to flooding in Public Park to the East.
SDUNS001	Duns	South of Earlsmeadow (Phase 1)	Y	We are satisfied with the developer requirements. Please note the following comments. We require an FRA which assesses the risk from the potentially culverted small watercourse which is identified as being located along the northern boundary. Recent studies have not identified the exact location of the culvert. We do not support development over culverts that are to remain active. We would note that the OS Map identifies this area as boggy which may constrain development. We also understand that land-raising done as part of the high school development may alter flooding and flow-paths. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues at this site or immediately adjacent. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
SDUNS001	Duns	South of Earlsmeadow	Y	<i>We require an FRA which assesses the risk to this site as noted by local residents. Careful design may be required to ensure there is no increase in flood risk elsewhere. Area shown as marshy on OS Map. Also review of the surface water 1 in 200 year flood map shows that there may be flooding issues on the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.</i>
SDUNS001	Duns	South of Earlsmeadow	Y	<i>We require an FRA which assesses the risk from the potentially culverted small watercourse which is identified as being located along the northern boundary. We do not support development over culverts that are to remain active. We would note that the OS Map identifies this area as boggy which may constrain development. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues at this site or immediately adjacent. This should be investigated further and it is recommended that contact is made with the flood prevention officer.</i>
zEL8	Duns	Peelrig Farm	Y	<i>We require an FRA which assesses the risk from the small watercourse which flows along the northern boundary of the site. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage. Consideration should be given to whether there are any culverted watercourses within/ near the site.</i>
AECCL001	Eccles	Main Street	Y	There is a potential culverted watercourse near to the site. There is no evidence it flows through the site. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues on the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.

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BEC4B	Eccles	Cherryburn	Y	There is a potential culverted watercourse near to the site. There is no evidence it flows through the site.
AEDDL002	Eddleston	North of Bellfield	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
AEDDL010	Eddleston	Land south of cemetery	Y	We are satisfied with the developer requirement, however, please see the following additional comments. We require an FRA which assesses the risk from the Eddleston Water. Any nearby small watercourses should be investigated as there was a mill dam upslope of the site in the past to ensure there are no culverted watercourses through the site. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Due to the steepness of the adjacent hill slopes we would also recommend that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and infrastructure are not at increased risk of flooding.
BESHI001	Eshiels	Land at Eshiels I	Y	We are satisfied with the developer requirement, however, please see the following additional comments. We require an FRA which assesses the risk from the Linn Burn and any small watercourses which flow through and adjacent to the site. The River Tweed may also require consideration. Consideration will need to be given to bridge and culvert structures within and adjacent to the site which may exacerbate flood risk. Due to the steepness of the adjacent hill slopes we would also recommend that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and infrastructure are not at increased risk of flooding.
AETTR002	Ettrick (Hopehouse)	West Eildon 2020 GIS calls site Hopehouse East	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
AETTR004	Ettrick (Hopehouse)	Hopehouse North East	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
BEY15B	Eyemouth	Gunsgreenhill	Y	There is a well located on site.
BEYEM001	Eyemouth	Gunsgreenhill	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
REYEM002	Eyemouth	Former Eyemouth High School Extension	Y	There is a covered reservoir on site which may require investigation.
REYEM003	Eyemouth	Gas Holder Station	Y	North Burn is culverted down Northburn Road. There are photos of flooding on Northburn Road from the burn in 1948.
REYEM005	Eyemouth	Whale Hotel	Y	We disagree with the developer requirement comments and require a modification. Flood risk should be assessed for site as risk is not just coastal but fluvial risk from the Eye Water. SEPA have no reviewed Eyemouth Flood Study but this does include coastal and fluvial flood risk. This would be the best source of information.

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REYEM007	Eyemouth	Former Town Hall	Y	We require an FRA which assesses the risk from coastal still water as well as overtopping processes and any interactions with the Eye Water. Redevelopment to a similar or less sensitive use would be supported by SEPA. An increase in vulnerability would only be supported if a detailed FRA can demonstrate the site is free from flood risk and there is safe access/egress available. Sewer flooding will also require consideration. Site may be constrained due to flood risk. The Eyemouth Flood Study (2020) may provide additional information.
zEL6	Eyemouth	Hawk's Ness	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
AFOUN005	Fountainhall	South Fountainhall	Y	We are satisfied with the developer requirements. Planning brief states that the risk from the watercourse will need to be addressed and mitigated.
AGALA017	Galashiels	Coopersknowe Phase 4	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
AGALA029	Galashiels	Netherbarns	Y	Although the proposed Plan requires a FRA we consider that no FRA is required, the site is adjacent to functional floodplain. A simple topographic information should be sufficient to demonstrate development avoids flood risk.
BGALA006	Galashiels	Land at Winston Road I	Y	<i>We require an FRA which assesses the risk from the River Tweed. Consideration will need to be given to bridge and culvert structures within and adjacent to the site. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.</i>
EGL16B	Galashiels	South Crotchetknowe	N	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
EGL200	Galashiels	North Ryehaugh	Y	Based on the OS Map, the site is sufficiently elevated above the Gala Water. Due to steep topography through the allocation site, consideration should be given to surface runoff issues to ensure adequate mitigation is implemented. Site will need careful design to ensure there is no increase in flood risk elsewhere and proposed housing is not affected by surface runoff.
EGL20B	Galashiels	Grange	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
EGL42	Galashiels	Forest Hill	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
MGALA002	Galashiels	South of Coopersknowe	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
MGALA003	Galashiels	Winston Road	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.

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zCR2	Galashiels	Huddersfield Street/Hill street	Y	No FRA required, site adjacent to functional floodplain. Simple site plan/FFL information should be sufficient to demonstrate development avoids flood risk.
zEL40	Galashiels	Netherdale Industrial estate	Y	<i>As the allocation is for business and industry safeguarding we require an FRA which assesses the risk from the Gala Water. The FRA is required to inform the area of redevelopment, type of development, and finished floor levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. We would not support any development which increases the flood risk to existing/proposed development.</i>
zEL41	Galashiels	Huddersfield Street Mill	Y	<i>As the allocation is for business and industry safeguarding we require an FRA which assesses the risk from the Gala Water. The FRA is required to inform the area of redevelopment, type of development, and finished floor levels. Sensitivity of use should be considered. We would not support any development which increases the flood risk to existing/proposed development.</i>
zEL42	Galashiels	Wheatlands Road	Y	<i>As the allocation is for business and industry safeguarding we require an FRA which assesses the risk from the Gala Water. The FRA is required to inform the area of redevelopment, type of development, and finished floor levels. It is important to consider sensitivity of use in line with our land use vulnerability guidance. We would not support any development which increases the flood risk to existing/proposed development. The site will likely be heavily constrained due to flood risk.</i>
zRO24	Galashiels	Heriot-Watt Halls of Residence	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
AGATT007	Gattonside	St Aidans	Y	We previously removed our objection to the proposed development in this allocation. Topographic information showed a sufficient height difference between the River Tweed and property. Should the proposal change from what was previously agreed we would require an FRA. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
EGT10B	Gattonside	Orchard	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
BGA1	Gavinton	West Gavinton	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
AGRAN004	Grantshouse	Land north of Mansefield	Y	Based on OS Map there is sufficient height difference between site and the Eye Water. Due to steep topography through the allocation site, consideration should be given to surface runoff issues to ensure adequate mitigation is implemented. Site will need careful design to ensure there is no increase in flood risk elsewhere and proposed housing is not affected by surface runoff.
AGREE004	Greenlaw	North of Edinburgh Road	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.

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AGREE006	Greenlaw	Marchmont Road II	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
BG200	Greenlaw	Marchmont Road	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
BGREE005	Greenlaw	Land south of Edinburgh Road	Y	<i>Due to the steepness of the adjacent hill slopes we would recommend that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and infrastructure are not at increased risk of flooding.</i>
MGREE003	Greenlaw	Former extension to Duns Road Industrial estate	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
SGREE003	Greenlaw	Halliburton Road	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
zEL22	Greenlaw	Duns Road Industrial Estate	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
AHAWI027	Hawick	Burnfoot (Phase 1)	Y	<i>Historic maps shows a watercourse flowing through the middle of the site which may now be culverted. We require an FRA which assesses the risk from this culverted watercourse. Buildings must not be constructed over an existing drain (including a field drain) that is to remain active. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Due to the steepness of the adjacent hill slopes we would also recommend that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and infrastructure are not at increased risk of flooding.</i>
BHAWI001	Hawick	North West Burnfoot	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
BHAWI002	Hawick	Gala Law North	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
BHAWI003	Hawick	Gala Law II	Y	Due to steep topography through the allocation site, consideration should be given to surface runoff issues to ensure adequate mitigation is implemented. Site will need careful design to ensure there is no increase in flood risk elsewhere and proposed housing is not affected by surface runoff.
BHAWI004	Hawick	Land to south of Burnhead	Y	There does appear to be a surface water/ combined drains through the site but no evidence of a culverted watercourse can be found. Due to steep topography through the allocation site, consideration should be given to surface runoff issues to ensure adequate mitigation is implemented. Site will need careful design to ensure there is no increase in flood risk elsewhere and proposed housing is not affected by surface runoff.
MHAWI001	Hawick	Gala Law	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.

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RHA21B	Hawick	Leaburn 2	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
RHA24A	Hawick	Crumhaughill	Y	There is a covered reservoir adjacent to the site. The Haggis Ha Burn has been historically culverted adjacent to site. Suggest there may be a water main in the area associated with the reservoir and this should be investigated.
<i>RHAWI010</i>	<i>Hawick</i>	<i>Cottage Hospital</i>	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
RHAWI011	Hawick	Factory, Fairhurst Drive	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
<i>RHAWI012</i>	<i>Hawick</i>	<i>St Margaret's & Wilton South Church</i>	Y	As the site is adjacent to the 1:200 year plus climate change flood envelope we do not object but recommend flood resistant and resilient materials are considered during the design stage.
zEL48	Hawick	Gala Law (Safeguarded site)	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
zEL60	Hawick	Gala Law Business and Industrial Land Proposal	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
<i>RHE2B</i>	Heiton	Heiton Mains	Y	Review of historic maps does not show the presence of any small watercourses on site but there does appear to be a Scottish Water asset through the site which may require investigation. Surface water runoff from nearby hills may be an issue. May require mitigation measures during design stage.
<i>RHE3B</i>	Heiton	Ladyrig	Y	Review of historic maps does not show the presence of any small watercourses on site but there does appear to be a Scottish Water asset through the site which may require investigation. Surface water runoff from nearby hills may be an issue. May require mitigation measures during design stage.
<i>AINNE004</i>	Innerleithen	Kirklands / Willowbank II	Y	<i>We require an FRA which assesses the risk from the small watercourses which flow along the boundary of the site. Consideration will need to be given to any culverts/ bridges which may exacerbate flood risk. Due to steep topography through the allocation site, consideration should be given to surface runoff issues to ensure adequate mitigation is implemented. Site will need careful design to ensure there is no increase in flood risk elsewhere and proposed housing is not affected by surface runoff.</i>

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MINNE001	Innerleithen	Caerlee Mill	Y	Should the agreed layout or development type differ from what was previously agreed we would require an updated FRA which considers our previous responses. As this area of Innerleithen is at flood risk, it is essential that any new development will have a neutral impact on flood risk and the FRA will inform the area of redevelopment, type of development, finished floor levels and ensure that the development has a neutral impact on flood risk. Furthermore flood resilient and resistant materials may be incorporated. Site will likely be constrained as a result. Consideration should be given to any lade structures through the site and buildings must not be constructed over an existing drain (including a field drain) that is to remain active. Review of the surface water 1 in 200 year flood map indicates that the, re may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
MINNE003	Innerleithen	Land west of Innerleithen	Y	<i>We require an FRA which assesses the risk from the River Tweed. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. In addition, surface water runoff from the nearby hills may be an issue and may require mitigation measures during design stage. Innerleithen Flood Study (2018) may provide additional information.</i>
SINNE001	Innerleithen	Kirklands II	Y	Two small watercourses, one on northern and other on southern boundary of site.
zEL16	Innerleithen	Traquair Road East	Y	As the area is at significant flood risk, it is essential that any new development will have a neutral impact on flood risk. We would only support redevelopment of a similar use in line with our land use vulnerability guidance. The FRA is required to inform the area of redevelopment, type of development, finished floor levels and ensure that the development has a neutral impact on flood risk. Furthermore, flood resilient and resistant materials should be used. Innerleithen Flood Study (2018) may provide additional information.
zEL200	Innerleithen	Traquair Road	Y	As the area is at significant flood risk, it is essential that any new development will have a neutral impact on flood risk. We would only support redevelopment of a similar use in line with our land use vulnerability guidance. The FRA is required to inform the area of redevelopment, type of development, finished floor levels and ensure that the development has a neutral impact on flood risk. Furthermore, flood resilient and resistant materials should be used. Innerleithen Flood Study (2018) may provide additional information.
AJEDB005	Jedburgh	Wildcat Gate South	Y	Area along southern boundary of the site is shown to be at pluvial flood risk which has picked up the route of the small watercourse. FRA is required to assess the risk of flooding.
AJEDB010	Jedburgh	Queen Mary Building	Y	Long history of flooding in this area in 1947,1947, 1966, 1982, Aug 2002 and Oct 2002, August 2012 and Dec 2013. Development must occur outwith the risk of flooding. Flood resilient and resistant materials should be used.

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AJEDB01 8	Jedburgh	Land East of Howdenburn Court II	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues in this area. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
BJEDB00 1	Jedburgh	Wildcat Wood and extension	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
RJ14B	Jedburgh	Oxnam Road	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
RJ2B	Jedburgh	Lochend	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
RJ7B	Jedburgh	Annefield	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
RJEDB00 1	Jedburgh	The Anna	Y	<i>Long history of flooding in this area in 1947, 1947, 1966, 1982, Aug 2002 and Oct 2002, August 2012 and Dec 2013. Would only support commercial/retail development at this site on condition that there was no increase in flood risk locally. No residential development acceptable and no development on top of culvert.</i>
RJEDB00 2	Jedburgh	Riverside Mill	Y	<i>As the area is at significant flood risk, it is essential that any new development will have a neutral impact on flood risk. We would only support redevelopment of a similar use in line with our land use vulnerability guidance. The FRA is required to inform the area of redevelopment, type of development, finished floor levels and ensure that the development has a neutral impact on flood risk. Sensitivity of use should be considered. Furthermore, flood resilient and resistant materials should be used. No residential development.</i>
RJEDB00 3	Jedburgh	Howdenburn Primary School	Y	We have reviewed historic maps and cannot find any evidence of a small watercourse. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues in this area. This should be investigated further and it is recommended that contact is made with the flood prevention officer.

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RJEDB006	Jedburgh	Jedburgh Grammar School I	Y	<i>Redevelopment is noted as the land use type. We require an FRA which assesses the flood risk from the Jed Water, Skiprunning Burn, and small watercourses which flow through/ adjacent to the site. The flood risk is complex at this location. Consideration should be given to any upstream and downstream structures and culverts which may exacerbate flood risk. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Site will be constrained due to flood risk. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues in this area. This should be investigated further and it is recommended that contact is made with the flood prevention officer.</i>
zEL31	Jedburgh	Wildcat Gate	Y	<i>Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.</i>
zEL32	Jedburgh	Hartrigge Park	Y	<i>Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.</i>
AKELS009	Kelso	Broomlands North	Y	<i>Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.</i>
AKELS022	Kelso	Hendersyde (Phase 1)	Y	<i>Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.</i>
AKELS026	Kelso	Nethershot (Phases 1 & 2)	Y	<i>Review of the surface water 1 in 200 year flood map shows that there may be flooding issues in this area. This should be investigated further and it is recommended that contact is made with the flood prevention officer.</i>
BKELS003	Kelso	Wooden Linn	Y	<i>Small watercourse flows along southern boundary. The surface water flood map picks up this low lying area. FRA required to assess the risk of flooding</i>
BKELS006	Kelso	Woodem Linn II	Y	<i>We require an FRA which assesses the risk from the Woodend Burn and tributary. Consideration should be given to any culverts/bridges which may exacerbate flood risk. Due to the steepness of the site we would also recommend that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and infrastructure are not at an increased risk of flooding.</i>
RKE12B	Kelso	Rosebank 2	Y	<i>Site appears to rise reasonably sharply but would be required to be assessed via a FRA.</i>
RKE1B	Kelso	Broomlands East	Y	<i>Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Based on topographic information available there is sufficient height difference between the allocation and the River Tweed.</i>

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RKELS002	Kelso	Former Kelso High School	Y	Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues adjacent to this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. No mention of this in 2013 Proposed Plan (adopted May 2016)
SKELS004	Kelso	Nethershot (Longer Term)	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
SKELS005	Kelso	Hendersyde (Longer Term)	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
zEL205	Kelso	Spylaw Road/Station Road	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
MNEWC001	Newcastleton	Caravan Site	Y	<i>Minor watercourses/drains potentially partly culverted flows on northern and western edge of site. 2 pond areas also present in this area. Newcastleton Flood Study (2018) may provided additional information.</i>
RNE2B	Newcastleton	South of Holmhead	Y	<i>Minor watercourse potentially partly culverted flows adjacent to site. Also large part of site within surface water flood map. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Newcastleton Flood Study (2018) may provided additional information.</i>
zEL44	Newcastleton	Moss Road	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
ANEWS005	Newstead	The Orchard	Y	<i>We require an FRA which assesses the risk from the small watercourse which is partially culverted through the site. Consideration will need to be given to bridge and culvert structures within and adjacent to the site. Developable area/ development type may be constrained due to flood risk. We do not support development over a culvert that is to remain active. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.</i>
BNEWT001	Newtown St Boswells	Tweed Horizons Expansion	Y	<i>Not shown to be at risk of flooding. Site lies approximately 15m above the watercourse which is sufficient in preventing the site from being at flood risk.</i>
ENT15B	Newtown St Boswells	Sergeant Parks II	Y	Site lies between 5 - 10m above the neighbouring watercourses based on OS information. As a result the height difference is sufficient to prevent the site from being at risk of flooding.
MNEWT001	Newtown St Boswells	Auction Mart	Y	Although adjacent too, appears to be above the risk of flooding.
zRO23	Newtown St Boswells	Mills	Y	Although adjacent too, appears to be above the risk of flooding.

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AOXTO010	Oxton	Nether Howden	Y	OS Map indicates a sufficient height difference between site and Leader Water. Surface Water Flood Map is potentially picking up the low point of the dismantled railway. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
APEEB031	Peebles	George Place	Y	We will require the provision of a FRA which assesses the flood risk from the Eddleston Water. Development is likely to be constrained on this site due to flood risk. Eddleston Water Flood Study (2018) may provide further information.
APEEB044	Peebles	Rosetta Road	Y	The FRA for 13/00444/PPP is dated Oct 2014. We therefore require a modification to the developer requirement. We require an updated FRA which assesses the risk from the Gill Burn and other small watercourses which flow through and adjacent to the site. Consideration will need to be given to bridge and culvert structures within and adjacent to the site. Review of the surface water 1 in 200 year flood map and steep topography indicates that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Site will need careful design to ensure there is no increase in flood risk elsewhere and the proposed development is not affected by surface runoff.
APEEB056	Peebles	Land south of Chapelhill Farm	Y	We require an FRA which assesses the risk from the Eddleston Water and small watercourses which flow along the southern and north eastern boundary. Consideration will need to be given to bridge and culvert structures within and adjacent to the site which may exacerbate flood risk. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues within the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Due to the steepness of the adjacent hill slopes we would also recommend that consideration is given to surface water runoff to ensure the site is not at risk of flooding and nearby development and infrastructure are not at increased risk of flooding. Eddleston Water Flood Study (2018) may provide further information to support FRA.
MPEEB006	Peebles	Resetta Road	Y	<i>We require an FRA which assesses the risk from the Gill Burn and other small watercourses which flow along the northern, southern, and western boundaries. Consideration will need to be given to bridge and culvert structures within and adjacent to the site which may exacerbate flood risk. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.</i>

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MPEEB007	Peebles	March Street Mills	Y	Although no evidence of a culverted watercourse can be found on historic maps we would highlight the potential risk during site investigations. We would stress that no buildings should be constructed over an existing drain/ lade that is to remain active. Review of the surface water 1 in 200 year flood map indicates that there may be flooding issues at this site. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
RPEEB001	Peebles	Dovecot Road	Y	<i>Settlement profile states that a FRA will be required to inform development at this site which we are satisfied with. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere.</i>
RPEEB002	Peebles	George Street	Y	We will require a FRA which assesses flood risk from the Eddleston Water. Development is likely to be constrained on this site due to flood risk. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere. Eddleston Water Flood Study (2018) may provide further information to support FRA.
RPEEB003	Peebles	Twedbridge Court	Y	<i>We will require a FRA which assesses the flood risk from the Eddleston Water. Development is likely to be constrained on this site due to flood risk. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere.</i>
SPEEB003	Peebles	South West of Whitehaugh	Y	We will require a FRA which assesses the flood risk from the Haytoun Burn. Haytoun Burn included within Peebles Flood Study (2018) and may provide information to support FRA.
SPEEB004	Peebles	North West of Hogbridge	Y	We will require a FRA which assesses the flood risk from The Cut and the small watercourse which is located on the southern boundary. Buildings must not be constructed over an existing drain (including a field drain) that is to remain active. Site just upstream of Haytoun Burn included within Peebles Flood Study (2018) but may provide some information to support FRA.
zEL2	Peebles	Cavalry Park	Y	Should the application differ from what we have previously agreed then we would require a FRA which assesses flood risk from the River Tweed .
AREST005	Reston	Land East of West Reston	Y	Sufficient height difference between the site and the Eye Water and lade.
BR5	Reston	West Reston	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
AROB001	Roberton	Roberton West	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.

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ASELK02 1	Selkirk	Philiphaugh North	Y	As the site is adjacent to the flood extent as derived by Halcrow (2006) and there are uncertainties associated with the peak flows on the LPB we would recommend consideration of flood resistant and resilient measures. Areas closest to the burn should remain as greenspace and ground levels should be profiled to slope away from the development to prevent ponding. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
ASELK03 3	Selkirk	Angles Field	Y	We are aware that significant restoration work has been undertaken on the Long Philip Burn as part of the Selkirk Flood Protection Scheme which is not reflected in the SEPA Flood Maps. The site is likely to be constrained by flood risk and will require a detailed FRA
BSELK00 1	Selkirk	Riverside 7	Y	Site is located behind Selkirk FPS and protected to events greater than a 1:200 year including sufficient climate change allowance. There is a residual risk from surface water ponding behind defences.
ESE10B	Selkirk	Linglie Road	Y	Located behind Selkirk FPS and protected from 1 in 200 year flood event plus an allowance for climate change. Site requirements states development is restricted to 0.75ha of this site. Should the application differ from what has been previously agreed we would object and require a FRA. Review of the available topographic information shows that the site lies at the foot of a steep hillside and therefore may be at risk of surface water flooding. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
ESE2	Selkirk	Kerr's Land	Y	Based on the surrounding topography, it is unlikely that the site will be at risk from the Pot Loch. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
MSELK00 2	Selkirk	Heather Mill	Y	This proposed change to the land use is understood to be an increase in vulnerability and is reliant on the FPS to protect the site from the Ettrick Water. In line with our current guidance, the allocation is in a built-up area and protected to events greater than a 1:200 year including sufficient climate change allowance. There is a residual risk from surface water ponding behind defences. Council should be mindful that allocating land for housing will increase the number of persons reliant on a FPS to protect them from flooding. We would stress that FPSs have a finite design life. We would be more supportive of a land use type that is similar to the current land use.
RSELK00 1	Selkirk	Forest Mill	Y	Site is located behind Selkirk FPS and protected to events greater than a 1:200 year including sufficient climate change allowance. There is a residual risk from surface water ponding behind defences. Mill Burn culverted through the site.
RSELK00 2	Selkirk	St Marys Church	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.

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RSELK003	Selkirk	Land at Kilncroft/Mill Street	Y	The Mill Burn is shown to be culverted adjacent to the site. Investigation of a potential culvert beneath the site should be considered. We recommend that contact is made with the local Flood Prevention Officer who may be able to provide further information relating to the culvert. It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere.
RSELK004	Selkirk	Souter Court	Y	It is important to consider sensitivity of use in line with our land use vulnerability guidance. Re-development should not increase flood risk elsewhere. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
zEL11	Selkirk	Riverside 2	Y	Site is located behind Selkirk FPS and protected to events greater than a 1:200 year including sufficient climate change allowance. There is a residual risk from surface water ponding behind defences. Culvert through the site
zEL15	Selkirk	Riverside 6	Y	Site is located behind Selkirk FPS and protected to events greater than a 1:200 year including sufficient climate change allowance. There is a residual risk from surface water ponding behind defences. Culvert through the site
RSP2B	Sprouston	Church Field	Y	Based on OS Map the site is elevated above the River Tweed. Review of the surface water 1 in 200 year flood map and nearby steep topography shows that there may be flooding issues in this area. This should be investigated further and it is recommended that contact is made with the flood prevention officer. Site will need careful design to ensure there is no increase in flood risk elsewhere and the proposed development is not affected by surface runoff.
zEL19	St Boswells	Extension to Charlesfield	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues. This should be investigated further and it is recommended that contact is made with the flood prevention officer
zEL3	St Boswells	Charlesfield	Y	<i>Review of the surface water 1 in 200 year flood map shows that there may be flooding issues. This should be investigated further and it is recommended that contact is made with the flood prevention officer.</i>
MSWIN002	Swinton	Land adjacent to Swinton Primary School	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
zEL45	Swinton	Coldstream Road	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
MTWEE001	Tweedbank	Site east of railway terminal	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
zEL39	Tweedbank	Tweedbank Industrial Estate	Y	Review of the surface water 1 in 200 year flood map shows that there may be flooding issues. This should be investigated further and it is recommended that contact is made with the flood prevention officer.
AWALK005	Walkerburn	Caberston Farm Land II	Y	<i>Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.</i>

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TW200	Walkerburn	Caberston Farm Land	Y	<i>Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.</i>
TWL15B	West Linton	School Brae	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
zEL24	Whitsome	Waste Transfer Station	Y	We will require a FRA which assesses the flood risk from the small watercourse. Consideration should be given to the downstream culvert or structure which may exacerbate flood levels.
BYETH001	Yetholm	NW of Deanfield Place	Y	The OS Map indicates a sufficient height difference between the site and The Stank Burn.
RY1B	Yetholm	Deanfield Court	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
RY4B	Yetholm	Morebattle Road	Y	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.

Connolly, Trish

From: Taylor, Jessica <Jessica.Taylor@sepa.org.uk>
Sent: 29 July 2021 15:02
To: localplan
Cc: CJohnston@scot.borders.gov.uk; Cagnoni, Silvia
Subject: 1768 SEPA response to Proposed Plan Policies
Attachments: 1768 SEPA response to PP Policies.pdf

CAUTION: External Email

PUBLIC

1768- SEPA response to Proposed Plan policies.

Thank you for consulting SEPA on the above proposal. Please find our response attached.

Where applicable this email has been copied to the agent and/or applicant; any relevant responses to the points we raise should be sent to the planning authority.

Information on our planning service along with guidance for planning authorities, developers and any other interested party is available on our website at <https://www.sepa.org.uk/environment/land/planning/>.

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Kind regards

Jess Taylor

Planning Officer

Planning Service

SEPA Stirling Office, Strathallan House, Castle Business Park, Stirling FK9 4TZ

email: planning.se@sepa.org.uk

mobile:07785 659179

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Dh'fhaodadh gum bi am fiosrachadh sa phost-d seo agus ceanglachan sam bith a tha na chois dìomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom

fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an cois a' phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh arithist.

Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu

postmaster@sepa.org.uk.

Oifis chlàraichte: Taigh Srath Alain, Pàirc Gnothachais a' Chaisteil, Sruighlea FK9 4TZ. Fo Achd Riaghladh nan Cumhachdan Rannsachaidh 2000, dh'fhaodadh gun tèid an siostam puist-d aig SEPA a sgrùdadh bho àm gu àm.