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28 February 2014

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

Town and Country Planning (Scotland) Acts Proposed Local Development Plan for Scottish Borders Council

Thank you for consulting SEPA on the Proposed Local Development Plan for the Scottish Borders. We are submitting our representations for the Proposed Plan (PP) consultation in this response rather than separately on-line, as agreed with Laura Hill on 5 February 2014. We thank you for your flexibility with this arrangement.

We are pleased to be able to support nine policies and the site requirements for almost sixty allocations. However, we have recommended changes to the wording of three policies, and requested modifications for a number of site allocations of which seven are requests for removal.

We present all the information in this single response, which is structured as follows:

- Section A - Policy representations**
- Section B - Allocation representations**
- Section C - Potentially Vulnerable Areas (PVA)**
- Section D - Summary of all site representations**


We welcome the opportunities that were offered to us to be consulted on an informal basis at several stages in the preparation of the plan. In particular, we welcomed the opportunity to comment on the draft policies (see our response of the 27 March 2013 – our ref: PCS/124851 - Alasdair Milne). We were also consulted on additional new sites post-MIR stage in October 2012. We are pleased to see that most of our comments have been taken into account.

We however have not been given the opportunity at earlier stages to comment on existing allocations carried forward from the Scottish Borders Local Plan (LP) and Local Plan Amendment (LPA) as requested in paragraph 10.3, 10.4 and 11.4 of our MIR response (22 June 2012 - our ref: PCS/119491- Angela Burke).

Both SEPA and the local authorities have duties under the Flood Risk Management (Scotland) Act 2009 to work towards reducing overall flood risk and to promote sustainable flood management. Although we responded to the consultation on the existing allocations in 2008 and 2009, and a



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Strategic Flood Risk Assessment has been carried out, we recommended that all allocations carried forward be assessed and accord with the new statutory and policy framework for flood risk management and climate change. This involves providing an opportunity for our Flood Risk Hydrology (FRH) officers to check the sites against the additional information available on flood risk.

In addition, following the publication of the River Basin Management Plan (RBMP) in 2009, we now have the opportunity to ensure that the development of these sites contributes to achieving the objectives of the RBMP.

We have therefore consulted our flood risk hydrologists and the local Operations team on all sites presented in the PP and made representations on the basis of their comments.

In particular, the comments we received from our hydrologists took into account the new flood maps for Scotland published on 15 January 2014. The new maps are the most comprehensive national source of data on flood hazard and risk. Please refer to the SEPA Briefing Note – Flood risk advice to planning authorities for more details.

http://www.sepa.org.uk/planning/flood_risk/planning_authorities.aspx

Although you have diligently included in the PP most of our previous recommendations, the representations included in this response in some cases supersede comments made at previous stages and therefore it has been necessary for us to request additional modifications.

For the purpose of brevity, we have made separate detailed representations for the sites that we wish to be removed from the plan and we have made comments about other modifications by grouping the sites on the basis of the change required. We used different colours to identify different sites: red for sites we have commented on at MIR stage and blue for new sites. Sites in black are all existing allocations.

It should be noted that we have issued a separate response to the Environmental Report through the SEA Gateway.

If you have any queries relating to this letter, please contact Alasdair Milne on [REDACTED] for the policy representations or Silvia Cagnoni Watt on [REDACTED] for site representations. Alternatively you can e-mail [REDACTED].

Yours sincerely

Sean Caswell
Planning Unit Manager
Planning Service

Section A - Policy representations

1. Summary of policy representations

Number	Policy	Nature of Representation
ED1	Protection of Business and Industrial Land	We support the inclusion of this policy
ED9	Renewable Energy Development	We support the principle of the policy but have recommended changes to wording
ED10	Protection of Agricultural Land and Carbon Rich Soils	We support the inclusion of this policy
EP12	Green Networks	We support the inclusion of 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
IS2	Developer Contributions	We support the inclusion of this policy
IS8	Flooding	Request modification to policy wording
IS9	Waste Water Treatment Standards and Sustainable Urban Drainage	We support the inclusion of this policy but have suggested minor alteration to wording
IS10	Waste Management Facilities	Modification of policy to clarify intentions regarding provision of waste facilities as detailed in table 1 of the policy
PMD2	Quality Standards	We support the inclusion of this policy
N/A	Waste general comments	Comments on supporting text

ED1 Protection of Business and Industrial Land (previously Policy ED1 Protection of Employment Land)

We **support** this policy which allows for waste management activity on district and local sites - this is in line with the Zero Waste Plan 2010 (ZWP).

We **support** the statement in paragraph 1.4 that waste management and small scale renewable energy developments are appropriate land uses within policy ED1 land.

This position is in line with Scottish Planning Policy (SPP) and ZWP. SPP paragraph 216 provides guidance on appropriate locations for waste management facilities, starting with: *“Modern waste management infrastructure is designed and regulated to high standards and is similar to other industrial processes. Locations which are appropriate for industrial or storage and distribution uses are therefore also appropriate for many waste management installations. “*

Annex B of the ZWP requires (paragraph 4.3) that in preparing local and strategic development plans, *“planning authorities should set out a locational or spatial strategy which includes waste management development. For all wastes arising in Scotland, this can be achieved by either allocating specific sites for waste management facilities, and/or indicating clearly and positively*

that land designated for employment, industrial or storage and distribution uses is appropriate for many waste management installations (subject to site specific considerations)."

ED9 Renewable Energy Development

Whilst we **welcome** the positive approach made towards renewable energy proposals, as outlined in the policy ED9 – Renewable Energy Development, we would like to offer the following comments:

We **welcome** the inclusion of the background text at paragraph 1.2 which outlines the Scottish Government targets for renewable energy as well as highlights the requirement for enhanced infrastructure and grid connections.

We **welcome** the statement in paragraph 1.4 that the Council intends to take forward work on heat mapping. We **recommend** that information is included in the text or within policy ED9 to expect developers to take into account, and be designed to make use of, the potential for district heating to use the heat identified in the heat map. In order to meet the energy efficiency requirements and targets set by the Scottish Government, as outlined in paragraph 1.2, renewable energy generated needs to be used by new developments. Creating links between heat producers and heat users is essential to create heat networks. For information, the Scottish Government is currently undertaking a national heat mapping exercise, identifying heat demand and sources of heat supply across the country. This information is expected to be published in the first half of 2014.

We **welcome** the support contained in paragraph 1.3 towards a wide range of renewable energy developments, including combined heat and power, biomass and Energy from Waste (EfW). However, the policy as currently written does not provide clear guidance for these types of development. In order to fully support the achievement of the Scottish Government energy efficiency requirements and climate change targets (as outlined in paragraph 1.2), we **strongly recommend** that the policy is amended to incorporate the expectation that proposed development that will supply renewable heat or power should be located close to existing or proposed heat networks, or close to areas of heat demand, in order to ensure the heat is utilised. If there is no existing or proposed network available, the proposed development should instigate the creation of one.

For information, when consulted on development proposals adjacent to existing or proposed heat providers (including EfW or renewable heat providers such as biomass) or district heating networks, SEPA will object to the proposal unless the new development connects or is designed to enable connection to utilise the heat provided. Similarly, for EfW proposals, or renewable energy proposals that provide heat, we will object where opportunities to utilise the heat and/or connect to the grid are not identified, or where proposals do not meet the energy efficiency requirements set out in our Thermal Treatment of Waste Guidelines (2013). This is not limited to housing developments, as all land uses can benefit from using heat.

ED10 Protection of Agricultural Land and Carbon Rich Soils

We **support** the inclusion of this policy which covers carbon rich soils and peat and takes into account the comments we made on the draft policy wording.

We note the exceptions to this policy as detailed in the supporting text paragraph 1.2. We welcome that our previous concerns regarding the requirement to avoid areas of deepest peat have been taken on board and additional wording on this issue has been included in the policy.

Furthermore we welcome the addition to the policy which requires a soil (or peat) survey to demonstrate that the areas of highest quality soil or deepest peat have been avoided. We also welcome the requirement for the provision of a soil or peat management plan in order to demonstrate that any unnecessary disturbance, degradation or erosion has been minimised, which includes proposed mitigation measures. This is particularly important for developments on peat, as bad management practices can disturb peat leading to oxidation and drying, and the unnecessary release of carbon dioxide.

EP12 Green Networks

We **support** the inclusion of this policy, specifically welcoming that the water environment is included as part of green network – this will help to contribute to the delivery of the River Basin Management Plan (RBMP) and Flood Risk Management Plan (FRMP) objectives of the Council. We welcome that paragraph 1.4 refers to the improvement of the quality of the water environment.

We welcome the cross reference to policy PMD2 Quality Standards.

EP15 Development Affecting the Water Environment

We **welcome** the inclusion of this policy - it provides good coverage of the 'protection and improvement' objective of Water Framework Directive (WFD). Indeed the starting point of the policy, the Council support for development proposals which seek to bring an improvement to the quality of the water environment, is particularly welcomed.

We note and welcome that you have amended this policy in line with our previous comments such that point d now includes a reference to the avoidance of flooding, pollution, excessive canalisation and culverting of watercourses. This accords with WFD objectives and is in line with SPP (Paragraph 211) - it is important that developments are designed to leave the water environment in its natural state, with engineering activities such as culverts, bridges, watercourse diversions, bank modifications or dams avoided wherever possible. These engineering impacts have been identified in the RBMPs as a significant pressure on the water environment. As such, we require LDPs to ensure that culverting and unnecessary engineering activities in the water environment are avoided through the policies in the plan and associated Supplementary Guidance (SG).

We note your intention to include coverage on enhancement and restoration of the water environment in the SG on Biodiversity. We support this and would welcome the opportunity to review this SG at an early stage.

As a final point, we would reiterate our earlier comments that in order to ensure the policy is correctly applied, we **recommend** that the supporting text should also explain that the term 'water

environment' applies to all aspects of the water environment, such as, rivers, lochs, groundwater, wetland, coastal waters and estuaries.

EP16 Air Quality

We **support** the inclusion of this policy. It should ensure that new developments do not have an adverse impact on air quality either through exacerbation of existing air quality problems or the introduction of new sources of pollution where they would impact on sensitive receptors. We welcome the requirement for Air Quality Assessments in cases where the Council considers that air quality may be affected by development proposals.

The successful implication of this policy will be reliant on development management officers being able to identify when an air quality assessment is required. Relevant developments are likely to be those that involve emissions to air (e.g. biomass or EfW applications) or lead to increased traffic on specific routes. It is important to note that, when considered in isolation, a single development is unlikely to have a significant impact on local air quality and may not trigger the need for an Air Quality Assessment. However, when it is considered alongside other developments in and around the area that may also increase traffic, the cumulative impact on some routes is likely to be more significant and could result in a breach of an air quality standard.

IS2 Developer Contributions

We **support** the continuation of this policy and welcome that contributions could be sought for the protection/enhancement of environmental assets (which would include the water environment), foul and surface water drainage and the provision of facilities to collect, store and recycle waste.

IS 8 Flooding

Whilst we welcome the framework provided by this policy, we would reiterate our previous comments that the plan should be strengthened by including an overarching statement that promotes the avoidance of flood risk as the most sustainable option. This precautionary approach is supported by SPP and the Flood Risk Management (Scotland) Act 2009. We therefore request that the Plan be **modified** to state clearly that development on the functional flood plain should be avoided. This will ensure the flood storage and conveyance capacity of the functional flood plain is safeguarded. Paragraph 205 of SPP requires local development plans to make such a commitment.

We ask that the policy be **modified** to include a general statement about avoidance of flood risk as a first principle.

We **recommend** 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.

We would highlight the difficulties we face in commenting on this policy given that we do not yet know what will be included in the SG. We previously recommended that access/egress, climate change allowance, water resistant materials all be covered in policy, although we would be content with these issues being dealt with by the SG, subject to it being statutory guidance.

In line with our comments on the previous draft of the Plan, we request that the Plan be modified to include a reference to the requirement for a competent flood risk assessment (FRA) being required of developers be amended such that the requirement for freeboard allowance is highlighted - this should state that adequate freeboard allowance is a requirement for all developments in addition to a climate change allowance.

Our [Land Use Vulnerability Guidance](#)¹ 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 and classifies the relative vulnerability of land uses into five groups from most vulnerable uses to water compatible uses. We ask that the plan be **modified** in order to incorporate the vulnerability principles into the policy. 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 approach is supported by the Scottish Government 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).

Please note that SEPA's Indicative Flood Maps were replaced by new Flood Maps on 15 January 2014 and you may wish to update bullet point b of the final paragraph of the policy.

We have worked closely with Stirling Council during the development of their flood risk policy. We consider [Primary Policy 5 - Flood Risk Management](#)² in the Proposed Stirling Local Development Plan (October 2012) to be a good example. This policy promotes the precautionary approach to flood risk, safeguards the functional flood plain and considers the vulnerability of the land use.

IS9 Waste Water Treatment Standards and Sustainable Urban Drainage

We **welcome** the amendment to this policy such that bullet point C now includes a reference to agreement with SEPA when considering proposals for permanent or temporary alternatives to sewer connections.

We welcome the amendment to the text such that the previous reference to 'septic tank' has been replaced with '*individual private sewage treatment system*'.

We note that this policy refers to designing Sustainable Urban Drainage System (SUDS) to the satisfaction of SEPA – this implies that SEPA could be asked to approve all SUDS even for small scale developments which is not in accordance with our guidance on How and When to Consult SEPA (www.sepa.org.uk/planning.aspx) which specifies the thresholds below which we have standing advice for planning authorities. We would ask that the policy be amended to read:

“...best practice on Sustainable Urban Drainage Systems to the satisfaction of the Council, Scottish Environment Protection Agency (where required)....”

We would welcome further clarification on this to be included in the forthcoming SG.

¹ www.sepa.org.uk/planning/flood_risk/policies_and_guidance.aspx

² www.stirling.gov.uk/__documents/temporary-uploads/economy,-planning-_and_-regulation/approved-pldp-oct-2012/chapters-1_9-03_10_2012.pdf

We welcome the amendment to paragraph 1.4 of the supporting text such that the policy now includes reference to developers being required to consider the green infrastructure and habitat benefits of SUDS.

IS10 Waste Management Facilities

We note that paragraph 1.4 makes reference to the Area Waste Plan for the Borders. It should be noted that all Area Waste Plans were superseded by the Zero Waste Plan (ZWP) in 2010. We **strongly recommend** that reference to the Area Waste Plan is removed and paragraph 1.4 is amended to read:

“The Council envisages the main site for waste treatment in the Borders to be Easter Langlee at Galashiels, which will be safeguarded for this purpose. Other waste facilities include waste transfer stations and community recycling facilities.”

We note that paragraph 1.6 suggests that SG on Waste Management will be prepared in the future; we support the preparation of this, and would welcome the opportunity to provide assistance in the preparation of this document.

With regard to the wording of the Policy, it is not clear if the first paragraph as written supports proposed new waste management facilities to be located where the existing provision of waste facilities are, as set out in table 1. If this is the intention of the policy, we object to the policy as written, and recommend that the wording is **modified** to reflect this:

“The Council will support the provision of new waste management facilities within the hierarchy and locations set out in table 1. Proposals that would prejudice the operation of existing and new waste facilities will not normally be supported.”

The waste policy should also clearly state that waste is an appropriate use on ED1 sites, in addition to existing waste management sites (if this is the intention of the first paragraph of policy IS10). We object to development plans which do not, *at the very least*, identify locations, and/or specific site allocations for all types of waste - unless the development plan can provide evidence to support that it is impossible to do so.

SPP paragraph 215 states that: *“All development plans must identify appropriate locations for required waste management facilities, where possible allocating specific sites, and provide a policy framework which facilitates the development of these facilities”*. Annex B of the ZWP requires (paragraph 4.3) that in preparing local and strategic development plans, *“planning authorities should set out a locational or spatial strategy which includes waste management development. For all wastes arising in Scotland, this can be achieved by either allocating specific sites for waste management facilities, and/or indicating clearly and positively that land designated for employment, industrial or storage and distribution uses is appropriate for many waste management installations (subject to site specific considerations).”*

We **support** the inclusion in the text preceding policy ED1 that states in paragraph 1.4 that waste management facilities are considered uses that can co-exist on an industrial estate; we recommend that this is similarly clearly stated in text that precedes policy IS10.

We **welcome** the inclusion of Policy ED9 Renewable Energy in “Key Policies to which this policy should be cross referenced”. However, the preceding text does not provide a clear link between renewable energy and waste. In our previous responses to the Main Issues Report and the draft PP, we strongly recommended that the plan should make clear links between the Renewable

Energy and Waste Infrastructure policies and that, whilst it may be covered in forthcoming SG, it would be beneficial to state this in the policy supporting text.

In our response to the Main Issues Report we stated:

(5) Other policy areas

*We **support** the Monitoring Statement conclusion that Policy D4 – Renewable Energy Development Rural Resources could be amended “..... to recognise the role of decentralised and local renewable or low carbon sources of heat and power, including energy from waste facilities and maximising the re-use of surplus heat....” We **recommend** that this includes making strong links between land allocations for development and the potential availability of heat from EfW proposals.*

Heat recovery is a key part of decision making when allocating sites for thermal plants and opportunities to site new plant close to existing and potential users of heat and power should be taken. If the LDP includes policy relating to energy from waste, it is essential that reference is made to SEPA’s [Thermal Treatment of Waste Guidelines](#), as this document is a material consideration for planning applications for proposed waste facilities that include thermal treatment of waste.)

PMD2 Quality Standards

We welcome and **support** the continuation and updating of this policy. We welcome that the comments we made on the draft plan have been taken into account, specifically with regard to Green Infrastructure and waste management (as it addresses waste separation and collection in line with the ZWP).

We **support** the inclusion in Sustainability subsection a) of the standards that require developers to demonstrate appropriate measures have been taken to maximise the efficient use of energy and resources, including the use of renewable energy and resources such as District Heating Schemes. It should be noted that we would object to any proposed development that has not been designed to be capable of connection to existing, or new, district heating networks or providers. We note and welcome the reference to the production of SG on waste and would welcome the opportunity to assist in the production of this.

We welcome the reference to Green Infrastructure within section c of the policy. This compliments the policy wording on Green Networks and we note that this policy is considered relevant to most other policies within the Plan.

Waste – General Comments

We **support** the inclusion of making adequate provision for waste management as one of the Local Development Plan aims, and the positive approach taken towards waste management as stated in paragraph 3.8 of page 16 that “*The provision of land to deal with waste is also a role for the Plan. Where this involves facilities for recycling or waste reduction, then this in turn will also help to reduce dependence on landfill sites.*” We also **support** the aim for Easter Langlee in Galashiels (paragraph 3.19, page 17) to improve recycling beyond the existing levels and the opportunity to create the provision of district heating in nearby areas.

Section B - Allocations representations

2. Summary of allocations SUPPORT

We **support** the following sites for the reasons provided in the table below:

Site number	Settlement	Site name	Reason for supporting
<i>ABONC003</i>	Bonchester Bridge	Site opposite Memorial Hall	FRA in Proposed Plan site requirements
<i>MCARD006</i>	Cardrona	North of Horsburgh Bridge	We support requirement for the connection to the public sewer
EC6	Clovenfords	Clovenfords West	FRA required in Planning Brief
ADENH001	Denholm	Denholm Hall Farm East	FRA required in Planning Brief
RD4B	Denholm	Denholm Hall Farm	FRA required in Planning Brief
AEARL002	Earlston	Surplus land at Earlston High School	FRA in Proposed Plan site requirements
AEARL010	Earlston	East Turfford	FRA in Proposed Plan site requirements
AEARL011	Earlston	Georgefield Site	FRA in Proposed Plan site requirements
EEA12B	Earlston	Earlston Glebe	FRA in Proposed Plan site requirements
<i>REARL001</i>	Earlston	Halcombe Fields	FRA included as site requirement. SEA suggests FRA as mitigation
SEARL006	Earlston	Georgefield East	FRA in Proposed Plan site requirements
zRO12	Earlston	Brownlie Yard	FRA in Proposed Plan site requirements
<i>AEDDL002</i>	Eddleston	North of Bellfield	Water resilient materials noted in site requirements, also noted that flood risk from overland flow to be assessed and mitigated
TE6B	Eddleston	Burnside	FRA required in Planning Brief
AETTR002	Ettrick (Hopehouse)	West Eildon	Comments on sewage treatment in PP
AETTR003	Ettrick (Hopehouse)	Hopehouse West	FRA required in Planning Brief
AETTR004	Ettrick (Hopehouse)	Hopehouse North East	Comments on sewage treatment in PP
<i>REYEM002</i>	Eyemouth	Former Eyemouth High School Extension	No comment
<i>REYEM003</i>	Eyemouth	Gas Holder Station	No comment
<i>AGALA027</i>	Galashiels	Extension of Birks Avenue	Water resilient materials noted in site requirements
BGALA002	Galashiels	Galafoot	FRA in Proposed Plan site requirements
<i>RGALA003</i>	Galashiels	Old Refuse Tip	PP states that FRA may be required
SGALA016	Galashiels	Hollybush Valley	FRA in Proposed Plan site requirements
zCR3	Galashiels	Stirling Street	FRA required in Planning Brief
zRO6	Galashiels	Roxburgh Street	FRA in Proposed Plan site requirements
RHAWI001	Hawick	Slitrig Crescent	FRA in Proposed Plan site requirements

RHAWI009	Hawick	Knitwear Factory	FRA in Proposed Plan site requirements
<i>RHAWI013</i>	Hawick	Former Council Houses, Eastfield Rd	FRA included as site requirement and also noted that design & layout should mitigate flood risk
<i>RHAWI014</i>	Hawick	Land on Mansfield Road	FRA included as site requirement and also noted that design & layout should mitigate flood risk
<i>RHAWI015</i>	Hawick	Land East of Community Hospital	FRA included as site requirement and also noted that design & layout should mitigate flood risk
zRO8	Hawick	Commercial Road	FRA required in Planning Brief
TI200	Innerleithen	Kirklands/Willowbank	FRA required in Planning Brief
AJEDB010	Jedburgh	Queen Mary Building	FRA required in Planning Brief
RJEDB001	Jedburgh	The Anna	FRA in Proposed Plan site requirements
<i>RJEDB002</i>	Jedburgh	Riverside Mill	FRA included to inform layout and mitigation and resilience
BKELS003	Kelso	Wooden Linn	FRA in Proposed Plan site requirements
<i>DKELS001</i>	Kelso	New Kelso High School	No comment
RKE12B	Kelso	Rosebank 2	FRA in Proposed Plan site requirements
<i>RKELS002</i>	Kelso	Former Kelso High School	No comment
ALAUD001	Lauder	West Allanbank	FRA in Proposed Plan site requirements
RLAUD002	Lauder	Burnmill	FRA in Proposed Plan site requirements
EM4B	Melrose	The Croft	Planning Brief states that a FRA may be required
MNEWC001	Newcastleton	Caravan Site	FRA in Proposed Plan site requirements
ANEWT005	Newtown St Boswells	Newtown Expansion Area	FRA in Proposed Plan site requirements
BNEWT001	Newtown St Boswells	Tweed Horizons Expansion	FRA in Proposed Plan site requirements
AOXTO001	Oxton	Station Yard	FRA in Proposed Plan site requirements
<i>APEEB021</i>	Peebles	Housing south of South Park	FRA included as site requirement and also noted that no development over culvert or on functional flood plain.
APEEB031	Peebles	George Place	FRA in Proposed Plan site requirements
RPEEB002	Peebles	George Street	FRA in Proposed Plan site requirements
RPEEB003	Peebles	Twedbridge Court	FRA in Proposed Plan site requirements
SPEEB004	Peebles	North West of Hogbridge	FRA in Proposed Plan site requirements
SPEEB005	Peebles	Peebles East (South of the River)	FRA in Proposed Plan site requirements
TP200	Peebles	Violet Bank Field	FRA in Proposed Plan site requirements
ASELK006	Selkirk	Philiphugh Steading	FRA in Proposed Plan site requirements
RSELK001	Selkirk	Forest Mill	FRA in Proposed Plan site requirements
ASTOW022	Stow	Craigend Road	FRA in Proposed Plan site requirements
AWALK005	Walkerburn	Caberston Farm Land II	FRA in Proposed Plan site requirements
zR200	Walkerburn	Caberston Farm/Old Mill Site	FRA in Proposed Plan site requirements
EY5B	Yarrowford	Minchmoor Road East	FRA in Proposed Plan site requirements

3. Modification - REMOVAL due to flood risk

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 these sites are removed from the proposed plan.

Site number	Settlement	Site name
SRB5B	Bonchester Bridge	Caravan site
EC2	Clovenfords	Caddonhaugh
EEA101	Earlston	Mill Road
EEA200	Earlston	Earlston Mill
<i>RINNE001</i>	Innerleithen	Former Gas Works
ANEWC010	Newcastleton	Newcastleton West
zRO200	Selkirk	Philiphough Mill

Please find detailed representations for the above sites in text below.

SRB5B - Bonchester Bridge - Caravan Park

We have reviewed the information provided in this consultation and it is noted that the application site (or parts thereof) lies within the medium likelihood (0.5% annual probability or 1 in 200 year) flood extent of the SEPA Flood Map, and may therefore be at medium to high risk of flooding.

We understand that outline planning permission was granted subject to conditions by Scottish Borders Council (SBC) without consultation with SEPA in 2001 or 2002 (01/00798/OUT). We would note that the e-planning website states that the subsequent detailed application has been withdrawn (03/01218/REM).

Halcrow Group Ltd undertook a Flood Risk Assessment (FRA) for this site in 2002. The model was partially calibrated using an estimate of peak flow at Bonchester Bridge on 1st February 2002 (using recorded flow data for the Jed Water at Jedburgh rather than the Rule Water) and flood levels observed at the site. However the 2002 flood flow was estimated, not recorded, and hence cannot offer a good calibration. The FRA concluded that flooding of part of the site could occur at flows around 40m³/s which is estimated to have a 1:2 year return period. The study also showed that flooding on site could range between 150mm and 790mm during a 1:100 year return period and between 270mm and 880mm during a 1:200 year return period. We would note that we had a number of concerns regarding the hydraulic model used to estimate the design flood levels for the site and stressed that the estimated levels in the FRA should therefore be treated with caution.

Two options were recommended to protect the site: 1) construction of a flood embankment, 2) land-raising the site. SEPA raised concerns regarding both these approaches. The construction of an informal embankment can have serious consequences should it be breached as inundation can be sudden and unexpected. Flooding can also be prolonged as water cannot freely drain back into the river should flood water overtop it. Embankments require regular inspection and maintenance and it was unclear who would accept this responsibility. Secondly, land-raising would



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reduce floodplain storage and potentially decrease the conveyance capacity of the reach. The Civil Engineering Design Manager of SBC stated that due to the sensitive location of this site, compensatory storage should be linked to any land-raising.

Another report was subsequently prepared by Carl Bro (2003) and it was discovered around this time that a flood embankment was constructed along the river bank opposite to the proposed development site. Work was also carried out to the downstream cauld. Carl Bro also raised concerns regarding the hydraulic modelling used by Halcrow.

SEPA staff visited the site and viewed and received some of the available photographs and footage of flooding at Bonchester Bridge, which includes the allocation site during the 2005 flood. Photographs shown to SEPA, taken of the properties at Anderson Court during this event, indicate that the flood on 1st February 2004 reached similar levels to that on 1st February 2002. Anderson Court is approximately 50 metres upstream from the proposed development site. It was understood from anecdotal evidence that the site has flooded to a similar level a further time between 1995 and 2004.

From photos of the flood reaching the toilet block on site during the 2004 event, Halcrow indicated that this flood level would have the approximate return period of between 1:50 and 1:100 years. Considering this has occurred relatively frequently, it suggests that the flood levels derived by Halcrow were underestimated.

Further anecdotal evidence suggests that the caravan site is flooded from surface water runoff from the A6088 and flows down the access road and passes in front of the property at Fernbank.

SPP is the latest statement of the Scottish Government's policy on nationally important land use planning matters. Paragraph 203, states that "For planning purposes the functional flood plain will generally have a greater than 0.5% (1:200) probability of flooding in any year. Development on the functional flood plain will not only be at risk itself, but will add to the risk elsewhere." Built development should not therefore take place on the functional flood plain. Access/ egress is also mentioned in SPP Paragraph 208 which would likely be problematic at this site. Paragraph 208 sets out the requirements that any land-raising should be linked with including:

- Be linked to the provision and maintenance of compensatory flood water storage to replace the lost capacity of the functional flood plain;
- Have a neutral or better effect on the probability of flooding elsewhere, including existing properties;
- Not create a need for flood prevention measures elsewhere;
- Not create islands of development but should adjoin developed areas outwith the functional flood plain; and
- Be set back from the bank of the watercourse.

Should any alterations be made to ground levels within this allocation, there is the potential to increase flood risk to existing properties as compensatory storage would likely be unachievable at this location. We acknowledge that this is a Brownfield site however as housing is proposed for this allocation, we would argue there is an increase in sensitivity as the change of use is from a business to a permanent residence. Since the consultations in 2003/2004 there has been the launch of the SEPA Indicative River and Coastal Flood Map followed by a newer release this year. In addition, the Flood Risk Management (Scotland) Act 2009 also places a shared duty to reduce overall flood risk and promote sustainable flood risk management. As there are observed records of flooding on site from the Rule Water, complicated further by the small watercourses and surface runoff, we strongly recommend removal of this allocation. Should an application come in for

housing at this site we would be unable to support it irrespective of the embankment or land-raising proposals.

EC2 - Clovenfords – Caddonhaugh

We have reviewed the information provided in this consultation and it is noted that the majority of the application site lies within the medium likelihood (0.5% annual probability or 1 in 200 year) flood extent of the SEPA Flood Map, and may therefore be at medium to high risk of flooding.

There is a well documented history of flooding in Clovenfords. Surface runoff from nearby hillslopes flooded gardens, garages, and property four times between 2012 and 2013. Also in 2012 blocked drains and surface runoff resulted in the closure of the A72 road in the village and a landslide occurred on Lairburn Drive. Local residents reported that raw sewage was repeatedly coming up through the drains during 2011. Caddonfoot Road and A72 junction was flooded in 2007 and 2012.

The allocation site is located between the Caddon Water and its tributary, the Meigle Burn, immediately upstream of the confluence of the two watercourses. There is a new development immediately to the north of the site which has been constructed on raised land. It is understood that the raised land was not linked to the provision of compensatory storage to replace that was lost by the development.

The site was granted outline permission in 2012 subject to a number of conditions including:
v. flood mitigation measures including full details of the compensatory storage area, including location, volume and surface area and implementation of this compensatory measure.

We provided our original comments to the outline planning request in 2004 however, outline permission was only granted in 2012. Between 2004 and 2012 there have been changes to policy and legislation including the Flood Risk Management (Scotland) Act 2009 which places a duty on SEPA and responsible authorities to reduce overall flood risk and promote sustainable flood risk management. In addition, the Indicative River and Coastal Flood Map was published in 2006, this has subsequently been updated in January 2014.

A FRA was been undertaken for the proposed development site by Dr John Riddell. The FRA recognises that parts of the proposed development site are low lying. It notes that there is an area of low ground that is likely to provide a flood flow channel through the site to the Meigle Burn and suggests that it may possibly be a remnant of a former river channel of the Caddon Water. The report also notes that the bank opposite the site is steep and is subject to erosion while on the same side as the site the bank is flatter and below the level of the eroding fields opposite. It is unclear whether the erosion of the opposite bank is linked to the raising of the ground levels associated with the new development immediately north of the proposed development site. The report states that it is proposed to raise ground levels on the site to provide finished floor levels of 148.0 mAOD for the new dwellings.

We would stress that the FRA used to inform the decision making at the outline planning stage was undertaken over eight years ago. The method employed by the consultant was simplistic and not of a standard that would be expected to support a detailed planning application. Furthermore, during the eight year period there may have been in-channel erosion and deposition processes that may have altered the relationship between water levels and the site. An up to date detailed FRA would likely only show that the site is unsuitable for development.

The report estimates that a total of around 2,500 m³ of floodwater storage will be lost due to the raising of the site, including the part of the site already raised. We would stress that SPP paragraph 208 states that land-raising should:

- Be linked to the provision and maintenance of compensatory flood water storage to replace the lost capacity of the functional flood plain;
- Have a neutral or better effect on the probability of flooding elsewhere, including existing properties;
- Not create a need for flood prevention measures elsewhere;
- Not create islands of development but should adjoin developed areas outwith the functional flood plain; and
- Be set back from the bank of the watercourse.

As the housing allocation is located on Greenfield land and the area has suffered from flooding in the past we strongly recommend that this site is removed from the LDP. Development in this area would likely result in loss of floodplain conveyance and storage which could result in the increase risk of flooding elsewhere. Any land-raising (which is for development on a Greenfield site and hence not supported) would require compensatory storage which does not appear to be feasible at this location. As such we do not support housing in this area as it is contrary to Scottish Planning Policy and the Flood Risk Management (Scotland) Act 2009.

EEA101 – Earlston – Mill Road

We have reviewed the information provided in this consultation and it is noted that the entire application site lies within the medium likelihood (0.5% annual probability or 1 in 200 year) flood extent of the SEPA Flood Map, and may therefore be at medium to high risk of flooding.

There is a long history of flooding in Earlston from both the Turfford Burn and the Leader Water. Damage to gas works, sawmill, and railway line was recorded in 1890. The level crossing which is thought to be on the right bank of the Leader Water adjacent to Melrose Road Bridge was flooded to a depth of 3 feet during this event. In 1948, homes, agricultural workshops, and businesses were flooded. Some homes were flooded to a depth of 36 inches and one house was flooded to 9 inches below the ground floor ceiling. Rhymers Woolen Mill which is on the downstream side of Mill Road (between Mill Road and Melrose Road) was flooded to a depth of 3-5 feet during the 1948 flood. A member of the public described flood water as coming up to the house which is on the north east boundary of the allocation. Property was also flooded in 1984 and this event was not as severe as the 1948 event. Based on information gathered by the Tweed River Purification Board the largest flood event on the Leader Water was 1948 followed by 1881, 1984, 1990 and 1956. Recently, a member of the public contacted SEPA to inform us that there was flooding of Haughhead Road and it was close to property north west of the allocation site in 2012. This event had a return period of less than a 1:15 years.

As the housing allocation is located on Greenfield land and has suffered from flooding in the past we strongly recommend that this site is removed from the Local Development Plan. Development in this area would likely result in floodplain conveyance and storage loss which could result in the increase risk of flooding elsewhere in Earlston. As such we do not support housing in this area.

EEA200 - Earlston - Earlston Mill

We have reviewed the information provided in this consultation and it is noted that the entire application site lies within the medium likelihood (0.5% annual probability or 1 in 200 year) flood

extent of the SEPA Flood Map, and may therefore be at medium to high risk of flooding.

There is a long history of flooding in Earlston from both the Turfford Burn and the Leader Water. Damage to gas works, sawmill, and railway line was recorded in 1890. The level crossing which is thought to be on the right bank of the Leader Water adjacent to Melrose Road Bridge was flooded to a depth of 3 feet during this event. In 1948, homes, agricultural workshops, and businesses were flooded. Some homes were flooded to a depth of 36 inches and one house was flooded to 9 inches below the ground floor ceiling. Rhymers Woolen Mill which is on the downstream side of Mill Road (between Mill Road and Melrose Road) was flooded to a depth of 3-5 feet during the 1948 flood. A member of the public described flood water as coming up to the house which is to the north east of the allocation and a considerable distance further away from the Leader Water than the allocation site. Property was also flooded in 1984 and this event was not as severe as the 1948 event. Based on information gathered by the Tweed River Purification Board the largest flood event on the Leader Water was 1948 followed by 1881, 1984, 1990 and 1956. Recently, a member of the public contacted SEPA to inform us that there was flooding to Haughhead Road and it was close to property north west of the allocation site in 2012. This event had a return period of less than 1:15 years.

We acknowledge that this is a Brownfield site however as housing is proposed for this allocation, we would argue that there is an increase in sensitivity as the change of use is from a business to a permanent residence. As the site has suffered from flooding in the past we strongly recommend that this site is removed from the LDP. Development in this area would likely result in floodplain conveyance and storage loss which could result in the increase risk of flooding elsewhere in Earlston. Should an application come in for housing at this site we would be unable to support it. It is worth noting that access/egress to the site would be problematic during a flood.

RINNE001 – Innerleithen - Gas Works

Review of the SEPA Flood Map shows that the entire site boundary of RINNE001 lies within the medium likelihood (0.5% annual probability or 1 in 200 year) flood extent for fluvial flooding.

In October 2002 the Leithen Water overtopped its banks at the A72 bridge and flowed down Princess Street towards the development site. Reported in local press, firemen were forced to alert the residents along Princess Street that the 'raging' water was in danger of encroaching onto their properties and to prepare for evacuation. Flood water was lapping between houses on Princess Street and flowing down the adjoining Montgomery Street. It is unclear as to the number of properties flooded.

Halcrow has recently carried out some hydraulic modelling work in Innerleithen for SEPA as part of a flood warning development project. Eight cross-sections of the Leithen Water channel and floodplain were surveyed to determine flood levels through Innerleithen. The final report from this study is not yet complete but initial conclusions are that the channel was around bankfull at a flow of $20\text{m}^3\text{s}^{-1}$, gardens on Princes Street would be flooded at $38\text{m}^3\text{s}^{-1}$ with a risk of some property flooding and at $63\text{m}^3\text{s}^{-1}$ floodwaters would be out of bank along the whole of Princes Street with a danger of high velocity floodplain flow. SEPA estimates that $63\text{m}^3\text{s}^{-1}$ has an annual probability of occurrence of about 2% (1:50).

Halcrow has supplied the cross-sections to SEPA. SEPA has added those cross-sections from the A72 road bridge to the River Tweed to the HEC-RAS model that it has constructed from cross-sections supplied by the applicant. The resulting model confirms the conclusion reached by Halcrow that floodwaters will be pouring into Princes Street, upstream of the development site at

around $63\text{m}^3\text{s}^{-1}$.

There is also the risk of direct flooding from the Leithen Water overtopping its banks adjacent to the development site.

As the site will be subjected to flooding, there is a risk of erosion to any development and the surrounding areas and this is another reason that this site is not suitable for development. The picture below shows how destructive this watercourse can be during a flood event. SEPA can provide evidence with a photograph showing severe flooding in Leithen Crescent, Innerleithen which is on the opposite bank of the development site. It is believed to have been taken in January 1949 when Peebles was also affected by severe flooding.

The site is deemed at risk of flooding based on the SEPA flood map and historic information. Although the development site was formally used as a gas works, it appears that there is no development on the site. SPP paragraph 203 states that "development on the functional floodplain will not only be at risk itself, but will add to the risk elsewhere". It continues "*functional floodplains store and convey flood water during times of flood... development on the functional flood plain will not only be at risk itself, but will add to the risk elsewhere.. Piecemeal reduction of the flood plain should be avoided because of the cumulative effects of reducing storage capacity*". As a result we cannot support the redevelopment of this site as it will increase the risk of flooding locally.

ANEWC010 – Newcastleton – Newcastleton West

With regards to allocation ANEWC010 entitled Newcastleton West for proposed housing, we have serious flood risk concerns at this site and have recommended the removal of this allocation within the finalised LDP.

Review of the SEPA Flood Map shows that the entire site boundary of ANEWC010 lies within the medium likelihood (0.5% annual probability or 1 in 200 year) flood extent for both fluvial (river) and surface water sources. We would also note that a hydraulic structure (bridge) is also in proximity to the site which could further exacerbate flooding in the event of under-capacity or blockage. A potential flood risk also exists from minor watercourse which flows along the western boundary of this potential allocation. This unnamed watercourse has a catchment area less than 3km^2 and as a result the potential flood risk from this watercourse has not been incorporated within the fluvial Flood Map.

A flood study has also been undertaken for this area (Halcrow, 2006 on behalf of SBC) which is thought to indicate that a significant area is at potential fluvial flood risk from the Liddel Water.

We have a gauging station (Liddel Water at Newcastleton) in relatively close proximity to the site. The record is relatively short (data from 1993) and some uncertainty with the high flow rating at this station but the maximum recorded flow was in October 2005 at $284\text{ m}^3/\text{s}$ which coincides with flooding in the area. Single site Statistical analysis has been undertaken using industry standard Flood Estimation Handbook (FEH) software which indicates that this was approximately a 1 in 35 year return period (or 3% annual probability). As outlined in the initial spreadsheet comments we also have records of the area being subject to flooding in August 2008 but have no further information on flood depth, extent or magnitude.

Based on these considerations we are of the opinion that the majority of this allocation proposal is potentially at medium-high flood risk. As it has been assumed that this is un-developed/sparsely developed floodplain any form of development within this area would not be compliant with the principles of SPP or Flood Risk Management (Scotland) Act 2009 and therefore an un-acceptable

development.

zRO200 – Selkirk - Philiphaugh Mill

Review of the SEPA Flood Map shows that the entire site boundary of zRO200 lies 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.

We are aware that there is an embankment in this area however this is not part of a formal defence scheme. Halcrow undertook a Flood Study for Selkirk in 2006 as part of the investigation for a Flood Prevention Scheme (FPS). Review of the flood extent outputs of the study demonstrates that the site is at risk of flooding from both a 1 in 100 year and 1 in 200 year flood event. A FPS is being progressed for Selkirk however construction has not started. It is our understanding that the site will be protected by the FPS however the Mill Lade is active and as such the site will remain at risk of flooding. It could also be said that the FPS will prevent flood waters from the Mill Lade from returning back to the Ettrick Water.

We would highlight that the Flood Risk Management (Scotland) Act 2009 sets in place a statutory framework for delivering a sustainable and risk-based approach to managing flooding. Flood risk is based on the probability of flooding and the impacts of flooding. Taking a risk-based approach for this site, the probability of flooding remains the same yet the impacts would be greater as the commercial buildings are replaced with permanent residential dwellings hence the overall flood risk would increase.

Change of use from a commercial to residential use results in an increase in vulnerability to flood risk by increasing the number of people at risk of flooding and as a whole could significantly increase flood risk overall. The flooding of people's homes has far greater impacts associated with it including social impacts related to health and stress issues. We would highlight that insurance for a residential development in a clear flood risk area may be problematic. And with insurance firms becoming increasingly cautious regarding flood risk, insurance may only become more problematic in the future.

In summary, we cannot support any residential development on this site as a change from industrial to residential would be an increase in the sensitivity of use and increase overall flood risk. However, we would be supportive of redevelopment of the site for a similar use.

Caveats & Additional Information

The SEPA Flood Maps have been produced following a consistent, nationally-applied

methodology for catchment areas equal to or greater than 3km² using a Digital Terrain Model (DTM) to define river corridors and low-lying coastal land. The maps are indicative and designed to be used as a strategic tool to assess, flood risk at the community level and to support planning policy and flood risk management in Scotland. For further information please visit http://www.sepa.org.uk/flooding/flood_maps.aspx.

Please note that we are reliant on the accuracy and completeness of any information supplied by the applicant in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.

The advice contained in this letter is supplied to you by SEPA in terms of Section 72 (1) of the Flood Risk Management (Scotland) Act 2009 on the basis of information held by SEPA as at the date hereof. It is intended as advice solely to Scottish Borders Council as Planning Authority in terms of the said Section 72 (1). Our briefing note entitled: "*Flood Risk Management (Scotland) Act 2009: Flood risk advice to planning authorities*" outlines the transitional changes to the basis of our advice inline with the phases of this legislation and can be downloaded from www.sepa.org.uk/planning/flood_risk.aspx.

4. Modification - Flood Risk Assessment required as a developer requirement

A flood risk assessment (FRA) should be included as a site specific developer requirement for the following sites (see table below). In addition, we recommend that the requirement specifies that no built development should take place on the functional flood plain or within an area of known flood risk.

These sites are located in or adjacent to the functional flood plain or an area of known flood risk. As such, part of the sites may not be suitable for development.

We understand that in some cases the PP site requirements or Planning Briefs include reference to investigation of flood risk, however we would request that the text included a specific reference to a FRA for completeness. Although the SBC may consider that flood risk is addressed in the current wording, we consider important to 'upgrade' the terminology used in the plan. The detail and technical complexity of an FRA will be proportionate to the scale and potential significance and vulnerability of the study area. We would direct the reader to SEPA's Technical Flood Risk Guidance for Stakeholder for further information.

We recommend that an action to address flood risk is also included within the action programme.

The site specific developer requirements should make it clear to developers that flood risk is an issue that needs to be taken into consideration and that a FRA will be required to inform the scale, layout and form of development. This will ensure that developers are fully informed of the flood risk issues affecting the site at the earliest opportunity thereby preventing delay and frustration later in the planning process. It will also ensure that flooding issues are taken into account prior to submitting a planning application and potential developers recognise that the developable area of the site may be constrained by flood risk.

The Flood Risk Management (Scotland) Act 2009 places a new duty on local authorities to "exercise their flood risk related functions with a view to reducing overall flood risk", "promote sustainable flood risk management" and "act in a way best calculated to contribute to the achievement of sustainable development". To support the principles of the Act the plan should take

a precautionary approach to managing flood risk by considering flooding from all sources and working towards sustainable flood management. The cornerstone of sustainable flood management is the avoidance of development in areas at risk of flooding. In accordance with the National Planning Framework (2009, para 5.5) development plans should also recognise the role of sustainable flood risk management as a climate change adaptation measure. Expansion of the developer requirements to specify the need for a flood risk assessment and ensure that no built development takes place on the functional flood plain (or within an area of known flood risk) will help promote a sustainable approach to managing flood risk in accordance with the Councils duties under the FRM Act.

Please note that the table below includes additional information specific to the sites. Our current comments supersede any comments made at previous stages, including confirmation that no FRA was required for some sites during the 2009 consultation. Sites in red are sites for which we have provided comments at MIR stage and sites in blue are new sites.

Please also note that the where the site requirements have made reference to the Planning Briefs, we have checked if FRA is recommended in these documents. The table below therefore includes sites where there was no reference to a FRA or a FRA was not considered necessary in the Planning Brief. Where there was reference to investigation of flood risk in the plan or in the SEA, we have highlighted this in italics. We have acknowledged the presence of a FRA in the Planning Brief, where applicable, as part of the supporting section.

Sites that require a modification to include a Flood Risk Assessment (FRA) as part of the developer requirements.

Site Number	Settlement	Site name	Additional comments
AAYTO003	Ayton	Lawfield	We require an FRA which assesses the risk from the small watercourse flowing through the site. Majority of site is likely to be developable.
TB200	Broughton	Dreva Road	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.
zEL43	Broughton	Former Station Yard	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. Consideration would need to be given to bridge and culvert structures near 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 Council's flood prevention officer.

EC13B	Clovenfords	Meigle	As we have a record of flooding to property immediately down hill of the allocation site we require an FRA which assesses the risk to the allocation and ensures there is no increase in flood risk elsewhere.
BCO10B	Cockburnspath	Burnwood	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.
BCL2B	Coldingham	Bogangreen	We require an FRA which assesses the risk from the Hill Burn and Bogan Burn which flow along the perimeters of the site. Consideration should be given to whether there are any culverted watercourses within the site.
zRO18	Coldstream	Lees Farm Mill	<i>We note that the PP site requirement mentions the 'investigation of potential flood risk'.</i> We previously commented on the redevelopment of this site at the pre-planning stage. We highlighted that the site is at significant risk of flooding from the Leet Water and the Tweed backing up. We have photos of farm buildings in Lees Farm having experienced flooding in 2002. It is noted in our response that the topographic survey indicates a rise along the west of the site so there may be a potential for some development along the western perimeter. An 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 development will likely be heavily constrained due to flood risk.
ACRAI001	Crailing	Crailing Toll	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.
EM9B	Darnick	Chiefswood Road	<i>We note that the PP site requirement mentions 'the exclusion of areas at risk of flooding from developable area'.</i> Due to the length of time that has elapsed since the FRA and potential changes that may have occurred to ground levels on site we require a further FRA. The majority of this site is at serious risk of flooding and will be heavily constrained due to flood risk. We would stress that it provides an important flood storage function for the existing properties downstream.
ADUNS010	Duns	Todlaw Playing Fields	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.

<i>ADUNS023</i>	<i>Duns</i>	<i>South of Earlsmeadow (Phase 1)</i>	<p><i>We note that the PP site requirement mentions 'the investigation of flood risk on site' and that the SEA refers to mitigation through a basic FRA.</i></p> <p>We require, however, an FRA which assesses the risk from the small watercourse. PAN 69 states that "buildings must not be constructed over an existing drain (including a field drain) that is to remain active". 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 Council's flood prevention officer.</p>
BD200	Duns	Langton Edge	We require an FRA which assesses the risk from the Pouterlynie Burn which flows along the southern boundary.
BD4B	Duns	Todlaw Road	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. 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 Council's flood prevention officer.
RDUNS002	Duns	Duns Primary School	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.
<i>RDUNS003</i>	<i>Duns</i>	<i>Disused Chicken Hatchery, Clockmill</i>	<p><i>We note that the PP site requirement mentions the 'investigation of potential flood risk' and that a FRA has been proposed as a mitigation measure in the SEA.</i></p> <p>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.</p>
SDUNS001	Duns	South of Earlsmeadow	<p><i>We note that the PP site requirement mentions the 'investigation of flood risk on site'.</i></p> <p>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 Council's flood prevention officer.</p>

zEL26	Duns	Berwick Road	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 Council's flood prevention officer. Consideration should be given to whether there are any culverted watercourses within/ near the site.
zEL8	Duns	Peelrig Farm	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.
BEARL002	Earlston	Townhead	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.
zEL55	Earlston	Turfford Park	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. 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.

zEL56	Earlston	Station Road	We require an FRA which assesses the risk from the Turfford 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. 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 Council's flood prevention officer. Consideration should be given to whether there are any culvert/bridges near the site.
zEL57	Earlston	Mill Road	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 will 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. Consideration should be given to whether there are any culvert/bridges near the site.
AEYEM006	Eyemouth	Gunsgreenhill Site C	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	We require an FRA which assesses the risk from the small watercourses which flow through and on the boundary of the site.
BEY2B	Eyemouth	Acredale Farm Cottages	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.
REYEM005	Eyemouth	Whale Hotel	<i>We note that the SEA identifies coastal risk and proposes FRA as mitigation (although site already developed). The PP however only asks for consideration of potential coastal flood risk.</i> As the site has previously flooded, any redevelopment should carefully 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. PP

			only mentions consideration of potential coastal flood risk. The FRA should consider all sources of flooding.
AFOUN005	Fountainhall	South Fountainhall	<p>We require an FRA which assesses the risk from the Pirmtaton Burn which flows along part of the site boundary. As there are known problems of flooding in Fountainhall, the site may be constrained due to flood risk. Careful consideration should be given to culvert/bridge structures within/ near the site. Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.</p> <p><i>We note that the Planning Brief states that flood risk from the burn to the north west of the site and from overland water flow would require to be Addressed and mitigated.</i></p>
AGALA024	Galashiels	Easter Langlee expansion area	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.
AGALA029	Galashiels	Netherbarns	<p><i>SEA states that 'part of site is within the 1:200 year flood risk envelope. However the site is significantly elevated from the river and flood risk is highly unlikely'.</i></p> <p>We require an FRA which assesses the risk from the River Tweed. Majority of site likely to be developable. 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 Council's flood prevention officer.</p>
BGALA003	Galashiels	Langhaugh Business and Industrial safeguarding	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 Council's flood prevention officer.
EGL17B	Galashiels	Buckholm Corner	We require an FRA which assesses the risk from the small watercourse which flows 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 Council's flood prevention officer.

EGL32B	Galashiels	Ryehaugh	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.
EGL43	Galashiels	Balmoral Avenue	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 Council's flood prevention officer.
RGALA001	Galashiels	St Aidans Church	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.
<i>RGALA002</i>	<i>Galashiels</i>	<i>Vacant Buildings at Kirk Brae</i>	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.
zCR2	Galashiels	Huddersfield Street/Hill street	We require an FRA which assesses the risk from the mill lade which flows 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 Council's flood prevention officer.
zED2	Galashiels	Heriot Watt University-Netherdale campus	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.
zEL40	Galashiels	Netherdale Industrial estate	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.

zEL41	Galashiels	Huddersfield Street Mill	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.
zEL42	Galashiels	Wheatlands Road	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.
zRO202	Galashiels	Melrose Road	Surface water runoff from the nearby hills may be an issue. May require mitigation measures during design stage.
zRO4	Galashiels	Plumtreehall Brae	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.
AHAWI006	Hawick	Guthrie Drive	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	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	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	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	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.
SHAWI003	Hawick	Burnfoot (Phase 1)	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 culvert. PAN 69 states that "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 Council's flood prevention officer.
zEL49	Hawick	Burnfoot	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.
zEL50	Hawick	Mansfield Road	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.
zEL52	Hawick	Liddesdale Road	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.

zEL62	Hawick	Weensland	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.
AINNE004	Innerleithen	Kirklands/Willowbank II	Two small watercourse, one on northern and other on southern boundary of site.
SINNE001	Innerleithen	Kirklands II	Two small watercourse, one on northern and other on southern boundary of site.
zEL16	Innerleithen	Traquair Road East	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.
zEL200	Innerleithen	Traquair Road	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.
zRO9	Innerleithen	High Street Gap Site	Potential development of the allocation could increase the probability of flooding elsewhere
AJEDB005	Jedburgh	Wildcat Gate South	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.
RJ27D	Jedburgh	Wildcat Cleuch	Small watercourse flows along western boundary and is culverted beneath Wildcat Cleugh road and should be assessed within any FRA.

zEL33	Jedburgh	Edinburgh Road	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.
zEL34	Jedburgh	Bankend South Industrial Estate	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.
zEL35	Jedburgh	Bongate South	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.
zEL37	Jedburgh	Bongate North	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	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	Small watercourse flows along southern boundary. The surface water flood map picks up this low lying area.

BLAUD002	Lauder	North Lauder Industrial Estate	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.
zEL61	Lauder	Lauder Industrial Estate	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	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.
RNE2B	Newcastleton	South of Holmhead	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 Council's flood prevention officer.
ENT4B	Newtown St Boswells	Melrose Road	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.
SPEEB003	Peebles	South West of Whitehaugh	We will require a FRA which assesses the flood risk from the Haytoun Burn.
TP7B	Peebles	Whitehaugh	We will require a FRA which assesses the flood risk from the Haystoun Burn. Development may be constrained at this site due to flood risk.
zEL2	Peebles	Cavalry Park	Should the application differ from what we have previously agreed then we would require a FRA which assesses flood risk from the River Tweed .
BR6	Reston	Rear of Primary School	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.
<i>MREST001</i>	<i>Reston</i>	<i>Auction Mart</i>	We were previously consulted on planning application and layout avoiding areas at risk of flooding has been agreed. recommended that a development requirement is attached to this allocation that specifies that if development comes forward for the site that differs from that consented then a new FRA may be required to ensure that development on the functional flood plain is avoided. Should the application differ from what has been

			<p>previously agreed then we would object and request the submission of an updated FRA to assess the flood risk from the Briery Burn.</p> <p><i>The SEA identified no negative effects - mitigation states that the site has planning permission and this has dealt with flood issues</i></p>
SREST001	Reston	Reston Longer Term 1	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. PAN 69 states that "buildings must not be constructed over an existing drain (including a field drain) that is to remain active".
SREST002	Reston	Reston Longer Term 2	A small watercourse is located in the SE area of the site which may result in localised flooding. This may be mitigated through design layout however a basic FRA may be required to assess developable areas of the site.
BSELK001	Selkirk	Riverside 7	We will require a FRA to assess the flood risk from the Ettrick Water. The Mill Burn may be culverted through or adjacent to the site. We recommend that contact is made with the Council's flood prevention officer who may be able to provide further information relating to the culvert. 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.
BSELK002	Selkirk	Riverside 5	We will require a FRA to assess the flood risk from the Ettrick Water. 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 Council's flood prevention officer.
BSELK003	Selkirk	Riverside 8	We will require a FRA to assess the flood risk from the Ettrick Water and the Mill Burn. Consideration should be given to any upstream and downstream structures and culverts which may exacerbate 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 Council's flood prevention officer. We understand that a Supplementary Guidance will be produced for this site, therefore if this is statutory and includes FRA we can remove the modification.

ESE10B	Selkirk	Linglie Road	<p><i>We note that flood risk is mentioned in the PP site requirements.</i></p> <p>Settlement profile states that development is restricted on this site. Should the application differ from what has been previously agreed we would object and require a FRA which assesses any impact on flood levels of the Ettrick Water from the FPS. 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 Council's flood prevention officer.</p>
zEL11	Selkirk	Riverside 2	<p>We will require a FRA to assess the flood risk from the Ettrick Water. The Mill Burn may be culverted through or adjacent to the site. We recommend that contact is made with the local Flood Prevention Officer who may be able to provide further information relating to the culvert. 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 Council's flood prevention officer.</p>
zEL15	Selkirk	Riverside 6	<p>We will require a FRA to assess the flood risk from the Ettrick Water. The Mill Burn may be culverted through or adjacent to the site. We recommend that contact is made with the local flood prevention officer who may be able to provide further information relating to the culvert. 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 Council's flood prevention officer.</p>
RSP3B	Sprouston	Teasel Bank	<p>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 Council's flood prevention officer.</p>
MSTOW001	Stow	Royal Hotel	<p>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.</p>

AWEST009	West Linton	Robinsland Steading	We will require a FRA which assesses the flood risk from the small watercourse located partially within the site and on the boundary. The watercourse may be culverted through the site and as such this should be investigated as part of any development proposal. PAN 69 states that "buildings must not be constructed over an existing drain (including a field drain) that is to remain active".
zEL18	West Linton	Deanfoot Road	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.

5. Comments on specific sites

MCARD007 – Cardrona - South of Horsburgh Bridge

Please note that although the need for a FRA is included in the site requirements, we have not supported this site. However we still have serious concerns about this allocation due to flood risk. We outlined our concerns in the MIR response (par 10.5) and in a meeting (26 September 2012). Flood risk is significant at this site and will severely constrain the developable area

APEEB041 – Peebles – Violet Bank II

Please note that although the need for a FRA is included in the site requirements, we have not supported this site. We note that the boundary has been changed to reflect the agreement of the planning permission in 2010. We previously commented on the site and agreed a flood level which stands, however should any subsequent application differ from what has been previously agreed, then we would object to a planning application unless a satisfactory FRA was submitted in support of that application.

6. Modification – flood resilient materials

We request a modification to developer requirements to require flood resilient materials for the sites in the table below. Please note some of the sites for which we requested the requirement for a FRA in Section 4 may also require flood resilient materials, however we consider that this will be addressed by the FRA.

In line with the comments we made at the MIR stage, we request that due to the potential of flood risk from small watercourses/ponds, culverts and pluvial flood risk, water resilient measures are incorporated into the design of the development and required by way of the developer requirements for this site. This will ensure that any potential impact from flooding is reduced and is in accordance with PAN 69.

Site Number	Settlement	Site name
<i>RGALA004</i>	Galashiels	Bylands
<i>MGREE001</i>	Greenlaw	South of Edinburgh Road
<i>RHAWI010</i>	Hawick	Cottage Hospital
<i>RHAWI011</i>	Hawick	Factory, Fairhurst Drive
<i>RHAWI012</i>	Hawick	St Margaret's & Wilton South Church
<i>RSELK004</i>	Selkirk	Souter Court

7. Modification – protect and improve the water environment

We identified several sites where measures could be put in place to ensure that the water environment is protected and improved. This included measures to contribute to achieving the objectives of the River Basin Management Plan (RBMP) and drainage constraints. An opportunity exists to protect or enhance the water environment and this has not been reflected in the developer requirements for these sites. These sites contain a waterbody/waterbodies which are downgraded mainly due to morphological pressures. We recommend that a developer requirement should be included for this site to help contribute to the objectives of the RBMP. Development should not add any further morphological pressures to the water bodies or result in any deterioration in status. Any opportunities to improve modified habitat should also be harnessed.

Site number	Settlement	Site name	Waterbody	Status
SRB5B	Bonchester Bridge	Caravan site	Rule Water	good
AEARL002	Earlston	Surplus land at Earlston High School	Turfford	moderate
AEARL010	Earlston	East Turfford	Turfford	moderate
AEARL011	Earlston	Georgefield Site	Turfford	moderate
EEA200	Earlston	Earlston Mill	Ladel Water	moderate
<i>REARL001</i>	<i>Earlston</i>	<i>Halcombe Fields</i>	Turfford	moderate
zRO12	Earlston	Brownlie Yard	Turfford	moderate
BGALA002	Galashiels	Galafoot	Gala Water	moderate
zCR3	Galashiels	Stirling Street	Gala Water	moderate
zRO4	Galashiels	Plumtreehall Brae	Gala Water	moderate
zTI1	Galashiels	Galashiels Transport Interchange	Gala Water	moderate
RHAWI009	Hawick	Knitwear Factory	Slitrig Water	good
RJEDB001	Jedburgh	The Anna	Jed Water	good
RKE12B	Kelso	Rosebank 2	Tweed	moderate
RLAUD002	Lauder	Burnmill	Lauder Burn	moderate

APEEB031	Peebles	George Place	Eddleston Water	bad
RPEEB002	Peebles	George Street	Eddleston Water	bad
RPEEB003	Peebles	Twedbridge Court	Tweed	moderate
SPEEB005	Peebles	Peebles East (South of the River)	Glensax Burn	good
TP7B	Peebles	Whitehaugh	Glensax Burn	good
BSELK001	Selkirk	Riverside 7	Ettrick Water	moderate
BSELK002	Selkirk	Riverside 5	Ettrick Water	moderate
BSELK003	Selkirk	Riverside 8	Ettrick Water	moderate
ESE10B	Selkirk	Linglie Road	Ettrick Water	moderate
<i>RSELK004</i>	<i>Selkirk</i>	<i>Souter Court</i>	Ettrick Water	moderate

In addition we have comments to add in relation to improvement of the water environment for the following sites:

Site number	Settlement	Site name	Comments
EGL43	Galashiels	Balmoral Avenue	Mossilee Burn site – The developer should ensure that the development does not cause any pollution issues and that the water environment is protected.
SGALA016	Galashiels	Hollybush Valley	Stannis burn is on the edge of the development site – The developer should ensure that the development does not cause any pollution issues and that the water environment is protected. The development should be connected to the public sewer.
ASELK006	Selkirk	Philiphaugh Steading	Site adjacent to the Long Philip Burn – The developer should ensure that the development does not cause any pollution issues and that the water environment is protected. There is a flood bund / wall proposed under SBC's Flood Protection Scheme close to Philiphaugh so any development there should not compromise this.
RSELK001	Selkirk	Forest Mill	The map shows a possible watercourse / wet area in this area. The developer should investigate this and ensure that the development does not cause any pollution issues and that the water environment is protected.
zRO200	Selkirk	Philiphaugh Mill	Site adjacent to the mill lade – The developer should ensure that the development does not cause any pollution issues and that the water environment is protected. There is a flood bund / wall proposed under SBC's Flood Protection Scheme close to Philiphaugh so any development there should not compromise this.

8. Modification – watercourse restoration

Developers should be encouraged to undertake a feasibility study to assess the potential for channel restoration by removing the existing or possible culverts. We recommend that this is included as a site specific developer requirement. Please find below a summary of sites were we identified the existence of a culvert or we would request the investigation of a possible culvert. We

would recommend applying the same principle for any other culverts that we may have missed during our assessment.

There may be an opportunity in these locations to restore the water environment to its natural state by removing the culvert. We recommend that developers are encouraged to consider this as part of the site proposals by including a feasibility study to assess the potential for channel restoration as a site requirement.

The land use planning system has been identified as having a key role to play in ensuring the protection and improvement of the water environment in accordance with the WFD and underlying RBMP. Planning authorities are "responsible authorities" under the Water Environment Water Services (Relevant Enactments and Designation of Responsible Authorities and Functions (Scotland) Order 2011 and as such are required to work to ensure compliance with the WFD and River Basin Planning process in carrying out their statutory functions.

Site Number	Settlement	Site name
AAYTO003	Ayton	Lawfield
ACRAI001	Crailing	Crailing Toll
TE6B	Eddleston	Burnside
AEYEM006	Eyemouth	Gunsgreenhill Site C
BEY2B	Eyemouth	Acredale Farm Cottages
EGL17B	Galashiels	Buckholm Corner
EGL19B	Galashiels	Mossilee
EGL41	Galashiels	Buckholm North
zEL16	Innerleithen	Traquair Road East
RJ27D	Jedburgh	Wildcat Cleuch
BKELS003	Kelso	Wooden Linn
zEL206	Kelso	Extension to Pinnaclehill Industrial Estate
EM4B	Melrose	The Croft
BNEWT001	Newtown St Boswells	Tweed Horizons Expansion
AOXTO001	Oxton	Station Yard
<i>APEEB041 (boundary change)</i>	<i>Peebles</i>	<i>Violet Bank II</i>
BR6	Reston	Rear of Primary School
SREST001	Reston	Reston Longer Term 1
AROB003	Roberton	Site adjacent to Kirk'oer
ASELK021	Selkirk	Philiphugh North

9. Good practice relating to buffer strips

We consider it general good practice having a buffer strip adjacent to a watercourse and recommend that all other sites not detailed at sections 7 and 8 above, and which are adjacent to a waterbody, could provide enhancement on water environment by the provision of appropriate buffer strips.

The inclusion of a requirement for a buffer strip along the watercourse will help protect and improve the water environment.

This is in keeping with your authority's duties as a responsible authority under The Water and Environment and Water Services (Scotland) Act 2003 to exercise your designated functions so as to secure compliance with requirements of the WFD.

Please also refer to the following policies for further advice: Policy EP12 - Green network, EP15 - Development Affecting the Water Environment and PMD2 - Quality Standards.

10. Recommend change – cemeteries

We note that the SBC is proposing the expansion of several cemeteries. We would advise taking into consideration our above advice on buffer strips in relation to watercourses close to cemeteries. In addition we would recommend taking into consideration the advice contained in Environmental Policy Number 19 – Groundwater Protection Policy for Scotland v3, section J - Cemetery development and green burial available in our website.

http://www.sepa.org.uk/planning/cemeteries/groundwater_cemeteries.aspx

Each extension application will be reviewed based on its own merit but some general pointers are listed below

- The watertable can be prohibitively high whereby sites may not be suitable, in addition it may not always be appropriate to use multiple depth burial lairs if the watertable is not deep enough to accommodate this. There should be 1m between the bottom of the burial pit and the watertable.
- Cemetery extensions may have site specific information available from previous site investigations undertaken for the existing cemetery. It should be noted that this will not always be applicable if conditions vary across the site, particularly if the more favourable areas have already been developed.
- On submission of an application, SEPA will consider risks to the water environment as a whole (i.e. surface water and groundwater).

11. Recommend change – co-location

We would request a modification to the site requirements for the following sites where we require the development layout to minimise risk of nuisance from co-location.

We consider that decisions on development proposals such as housing close to regulated sites should be made with full knowledge of the potential interaction between the two. There are many examples of sensitive development being permitted close to regulated processes that result in requirements for tighter and more expensive controls for the businesses concerned in order to avoid nuisance. The developments can also lead to long term complaints in relation to – for example – odour and noise. This in turn results in disproportionate use of SEPA resources to resolve such problems, which would not have arisen had the decision to place new development close to the source been taken in full awareness of the likelihood of impact on people.

We will provide to planning authorities, on request, information on the location and nature of such regulated processes and the technical standards to which they operate.

As this is a matter on which the planning authority must make an informed decision we will not object to a development proposal in this situation. We will, in such circumstances, recommend that planning authorities consult the operator of the regulated site as the licence holder also has a responsibility to make representations to the planning authority.

Site Number	Settlement	Site name	Possible co-location issues
BD4B	Duns	Todlaw Road	There may be co-location issues for this allocation depending on the use of site zEL26.
AGALA024	Galashiels	Easter Langlee expansion area	This allocation is located in proximity to a licensed waste management facility. Locating additional housing close to this existing site and to the future advanced thermal treatment plant proposed in this location may increase the number of people potentially affected by nuisance. We therefore recommend that your authority consider whether a housing development at this location would be appropriate in co-location with the waste management facilities and we recommend that contact is made with your Environmental Health Department colleagues. If the site is retained in the LDP your authority may wish to include specifications in the development requirements regarding development layout to minimise risk of nuisance from the facility.
ALAUD001	Lauder	West Allanbank	The site is close to a Council regulated poultry unit. Locating additional housing close to this existing site may increase the number of people potentially affected by nuisance. We recommend that contact is made with your Environmental Health Department colleagues. If the site is retained in the LDP your authority may wish to include specifications in the development requirements regarding development layout to minimise risk of nuisance from the facility.

Section C – Potentially Vulnerable Area (PVA)

Potentially Vulnerable Area (PVA) details for allocations which fall within a PVA

In December 2011, SEPA published the National Flood Risk Assessment (NFRA) required by the Flood Risk Management (Scotland) Act 2009. The NFRA identifies areas that are potentially vulnerable to flood risk (Potentially Vulnerable Areas or PVAs). This information does not imply that all sites within a PVA are subject to flood risk.

The NFRA datasets will in future help to support Flood Risk Management Planning by 2015. Development Plans in future will require to have regard to Flood Risk Management Plans.

We have considered the strategic information in the FRMA with respect to PVA locations within the development plan area and would advise that the location of this Development Plan is within the following PVA's and the key information available in the FRMA for these PVAs includes:

PVA 10/26

- Summary of main impacts – Assessment of future flood risk and past events shows fluvial and coastal sources present: limited impact to agriculture; limited impact to less resilient environmental designation and impact to sensitive designated sites, with infrequent reports of flooding in the area.
- Main sources of flood risk – fluvial, coastal and pluvial
- Number of existing properties currently at risk - 59

PVA 13/01

- Summary of main impacts - Assessment of future flood risk and past events shows that Lyne Water presents: impact to some residential properties and impact to a small number of commercial properties, with infrequent reports of flooding in the area between 1891 and 2004.
- Main sources of flood risk – fluvial and pluvial
- Number of existing properties currently at risk - 192

PVA 13/03

- Summary of main impacts - Assessment of future flood risk and past events shows limited impact to agriculture, with infrequent reports of flooding in the area. Existing defences on a tributary of Washing Burn offer partial protection to some of these impacts.
- Main sources of flood risk – fluvial and pluvial
- Number of existing properties currently at risk - 6

PVA 13/04

- Summary of main impacts - Assessment of future flood risk and past events shows that the River Tweed and its tributaries present: impact to a large number of residential properties; impact to high category community facilities; impact to a large number of commercial properties; impact to major transport links; impact to extensive areas of high grade agricultural land; impact to an extensive areas of sensitive environmental designation and impact to extensive areas of sensitive designated sites, with frequent reports of flooding in the area between 1723 and 2009. Existing defences on Chapmans Burn, Edderston Burn and Gala Water offer partial protection to some of these impacts.

- Main sources of flood risk – fluvial and pluvial
- Number of existing properties currently at risk - 2823

PVA 13/05

- Summary of main impacts - Assessment of future flood risk and past events shows that Leader Water and Kelphope Burn present: impact to a small number of residential properties; impact to some commercial properties and impact to high grade agricultural land, with frequent reports of flooding in the area between 1831 and 1984. Existing defences on Turfford Burn offer partial protection to some of these impacts.
- Main sources of flood risk – fluvial and pluvial
- Number of existing properties currently at risk - 81

PVA 13/06

- Summary of main impacts - Assessment of future flood risk and past events shows that Leet Water presents: impact to some residential properties; impact to high grade agricultural land and limited impact to less resilient designated sites, with frequent reports of flooding in the area between 1905 and 2005.
- Main sources of flood risk – fluvial and pluvial
- Number of existing properties currently at risk - 6

PVA 13/08

- Summary of main impacts - Assessment of future flood risk and past events shows that Broughton Burn and Biggar Water present: impact to a small number of residential properties and impact to medium category community facilities, with infrequent reports of flooding in the area.
- Main sources of flood risk – fluvial and pluvial
- Number of existing properties currently at risk - 93

PVA 13/09

- Assessment of future flood risk and past events shows that the River Tweed presents: impact to some residential properties; impact to high grade agricultural land and impact to sensitive designated sites, with frequent reports of flooding in the area between 1793 and 2005.
- Main sources of flood risk – fluvial and pluvial
- Number of existing properties currently at risk - 131

PVA 13/10

- Summary of main impacts - Assessment of future flood risk and past events shows that Jed Water and Raven Burn present: impact to some residential properties; impact to a large number of commercial properties; impact to high grade agricultural land and impact to sensitive designated sites, with frequent reports of flooding in the area between 1865 and 2010. Existing defences on Skiprunning Burn and Jed Water offer partial protection to some of these impacts.
- Main sources of flood risk – fluvial and pluvial
- Number of existing properties currently at risk - 167

PVA 13/11

- Summary of main impacts - Assessment of future flood risk and past events shows small watercourses present: limited impact to agriculture, with infrequent reports of flooding in the area. Existing surface run-off scheme in Denholm offer partial protection to some of these impacts.
- Main sources of flood risk – fluvial and pluvial
- Number of existing properties currently at risk - 11

PVA 13/12

- Summary of main impacts – Assessment of future flood risk and past events shows that Teviot Water and Slitrig Water present: impact to a large number of residential properties; impact to high category community facilities; impact to a large number of commercial properties; limited impact to agriculture and limited impact to less resilient environmental designation, with frequent reports of flooding in the area between 1767 and 2006.
- Main sources of flood risk – fluvial and pluvial
- Number of existing properties currently at risk - 992

PVA 13/13

- Summary of main impacts – Assessment of past events shows infrequent reports of flooding in the area between 1767 and 2005.
- Main sources of flood risk – fluvial and pluvial
- Number of existing properties currently at risk - 37

PVA 14/03

- Summary of main impacts – Assessment of future flood risk and past events shows that Liddel Burn presents: impact to some residential properties; impact to medium category community facilities and impact to a small number of commercial properties, with frequent reports of flooding in the area between 1990 and 2008.
- Main sources of flood risk – fluvial and pluvial
- Number of existing properties currently at risk - 181

Any locations within a Development Plan outwith a PVA, should not be assumed to be free from flood risk. SEPA has produced the NFRA as the first stage of the Flood Risk Management Planning process. This sub-catchment area is not included as a PVA because it is below the threshold of significance of the NFRA/PVA method.

Section D – Summary of site representations

Site number	Settlement	Site name	Summary of representation
AAYTO003	Ayton	Lawfield	Modification to developer requirements to require a flood risk assessment (FRA), and to help contribute to the objectives of the River Basin Management Plan
ABONC003	Bonchester Bridge	Site opposite Memorial Hall	We support the inclusion of FRA in the site requirements
SRB5B	Bonchester Bridge	Caravan site	Recommend modification: removal of site due to flood risk. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
TB200	Broughton	Dreva Road	Modification to developer requirements to require a flood risk assessment (FRA)
zEL43	Broughton	Former Station Yard	If the site is used for residential development we would require a modification to developer requirements to require a flood risk assessment (FRA)
MCARD006	Cardrona	North of Horsburgh Bridge	We support the requirement for the connection to the public sewer
MCARD007	Cardrona	South of Horsburgh Bridge	We have specific comments to make about this site in relation to flood risk
EC13B	Clovenfords	Meikle	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA)
EC2	Clovenfords	Caddonhaugh	Recommend modification: removal of site due to flood risk
EC6	Clovenfords	Clovenfords West	We support the inclusion of FRA in the Planning Brief
BCO10B	Cockburnspath	Burnwood	Modification to developer requirements to require a flood risk assessment (FRA)
BCL2B	Coldingham	Bogangreen	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA)
zRO18	Coldstream	Lees Farm Mill	Modification to developer requirements to require a flood risk assessment (FRA)
ACRAI001	Crailing	Crailing Toll	Modification to developer requirements to require a flood risk assessment (FRA), and to help contribute to the objectives of the River Basin Management Plan
EM9B	Darnick	Chiefswood Road	Modification to developer requirements to require a flood risk assessment (FRA)
ADENIH001	Denholm	Denholm Hall Farm East	We support the inclusion of FRA in the Planning Brief



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RD4B	Denholm	Denholm Hall Farm	We support the inclusion of FRA in the Planning Brief
ADUNS010	Duns	Todlaw Playing Fields	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA)
<i>ADUNS023</i>	<i>Duns</i>	<i>South of Earlsmeadow (Phase 1)</i>	Modification to developer requirements to require a flood risk assessment (FRA)
BD200	Duns	Langton Edge	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA)
BD4B	Duns	Todlaw Road	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA) and to require the development layout to minimise risk of nuisance from co-location depending on the use of site zEL26
RDUNS002	Duns	Duns Primary School	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA)
<i>RDUNS003</i>	<i>Duns</i>	<i>Disused Chicken Hatchery, Clockmill</i>	Modification to developer requirements to require a flood risk assessment (FRA)
SDUNS001	Duns	South of Earlsmeadow	Modification to developer requirements to require a flood risk assessment (FRA)
zEL26	Duns	Berwick Road	Modification to developer requirements to require a flood risk assessment (FRA)
zEL8	Duns	Peelrig Farm	Modification to developer requirements to require a flood risk assessment (FRA)
AEARL002	Earlston	Surplus land at Earlston High School	We support the inclusion of FRA in the site requirements. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
AEARL010	Earlston	East Turfford	We support the inclusion of FRA in the site requirements. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
AEARL011	Earlston	Georgefield Site	We support the inclusion of FRA in the site requirements. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
BEARL002	Earlston	Townhead	Modification to developer requirements to require a flood risk assessment (FRA)
EEA101	Earlston	Mill Road	Recommend modification: removal of site due to flood risk
EEA12B	Earlston	Earlston Glebe	We support the inclusion of FRA in the site requirements. We would advise to minimise nuisance from proximity to with sewage works

EEA200	Earlston	Earlston Mill	Recommend modification: removal of site due to flood risk. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
<i>REARL001</i>	<i>Earlston</i>	<i>Halcombe Fields</i>	We support the inclusion of FRA in the site requirements. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
SEARL006	Earlston	Georgefield East	We support the inclusion of FRA in the site requirements.
zEL55	Earlston	Turford Park	Modification to developer requirements to require a flood risk assessment (FRA)
zEL56	Earlston	Station Road	Modification to developer requirements to require a flood risk assessment (FRA)
zEL57	Earlston	Mill Road	Modification to developer requirements to require a flood risk assessment (FRA)
zRO12	Earlston	Brownlie Yard	We support the inclusion of FRA in the site requirements. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
<i>AEDDL002</i>	<i>Eddleston</i>	<i>North of Bellfield</i>	We support the requirement for water resilient materials.
TE6B	Eddleston	Burnside	We support the inclusion of FRA in the Planning Brief. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
AEILD002	Eildon	West Eildon	Modification to consider cumulative impact of water drainage
AETTR002	Ettrick (Hopehouse)	West Eildon	We support the inclusion of FRA in the Planning Brief and the comments on sewage treatment in the infrastructure considerations
AETTR003	Ettrick (Hopehouse)	Hopehouse West	We support the inclusion of FRA in the Planning Brief
AETTR004	Ettrick (Hopehouse)	Hopehouse North East	We support the comments on sewage treatment in the infrastructure considerations
AEYEM006	Eyemouth	Gunsgreenhill Site C	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA) and to help contribute to the objectives of the River Basin Management Plan
AEYEM007	Eyemouth	Gunsgreenhill Site B	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA)
BEY2B	Eyemouth	Acredale Farm Cottages	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA) and to help contribute to the objectives of the River Basin Management Plan
<i>REYEM002</i>	<i>Eyemouth</i>	<i>Former Eyemouth High School Extension</i>	We support this site
<i>REYEM003</i>	<i>Eyemouth</i>	<i>Gas Holder Station</i>	We support this site

REYEM005	Eyemouth	Whale Hotel	Modification to developer requirements to require a flood risk assessment (FRA) and consider all sources of flooding
AFOUN005	Fountainhall	South Fountainhall	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA)
AGALA024	Galashiels	Easter Langlee expansion area	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA) and to require the development layout to minimise risk of nuisance from co-location with the existing landfill and a future advanced thermal treatment plant
AGALA027	Galashiels	Extension of Birks Avenue	We support the requirement for water resilient materials.
AGALA029	Galashiels	Netherbarns	Modification to developer requirements to require a flood risk assessment (FRA)
BGALA002	Galashiels	Galafoot	We support the inclusion of FRA in the site requirements. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
BGALA003	Galashiels	Langhaugh Business and Industrial safeguarding	Modification to developer requirements to require a flood risk assessment (FRA)
EGL17B	Galashiels	Buckholm Corner	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA) and to help contribute to the objectives of the River Basin Management Plan
EGL19B	Galashiels	Mossilee	Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
EGL32B	Galashiels	Ryehaugh	Modification to developer requirements to require a flood risk assessment (FRA)
EGL41	Galashiels	Buckholm North	Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
EGL43	Galashiels	Balmoral Avenue	Modification to developer requirements to require a flood risk assessment (FRA)
RGALA001	Galashiels	St Aidans Church	Modification to developer requirements to require a flood risk assessment (FRA)
RGALA002	Galashiels	Vacant Buildings at Kirk Brae	Modification to developer requirements to require a flood risk assessment (FRA)
RGALA003	Galashiels	Old Refuse Tip	We support the inclusion of FRA in the site requirements
RGALA004	Galashiels	Bylands	Modification to developer requirements to require flood resilient materials.
SGALA016	Galashiels	Hollybush Valley	We support the inclusion of FRA in the site requirements
zCR2	Galashiels	Huddersfield Street/Hill street	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA)

zCR3	Galashiels	Stirling Street	We support the requirement for FRA in the Planning Brief. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
zED2	Galashiels	Heriot Watt University-Netherdale campus	Modification to developer requirements to require a flood risk assessment (FRA)
zEL40	Galashiels	Netherdale Industrial estate	Modification to developer requirements to require a flood risk assessment (FRA)
zEL41	Galashiels	Huddersfield Street Mill	Modification to developer requirements to require a flood risk assessment (FRA)
zEL42	Galashiels	Wheatlands Road	Modification to developer requirements to require a flood risk assessment (FRA)
zRO202	Galashiels	Melrose Road	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA)
zRO4	Galashiels	Plumtreehall Brae	Modification to developer requirements to require a flood risk assessment (FRA). Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
zRO6	Galashiels	Roxburgh Street	We support the inclusion of FRA in the site requirements
zTI1	Galashiels	Galashiels Transport Interchange	Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
<i>MGREE001</i>	<i>Greenlaw</i>	<i>South of Edinburgh Road</i>	Modification to developer requirements to require flood resilient materials.
MGREE003	Greenlaw	Former extension to Duns Road Industrial estate	
AHAWI006	Hawick	Guthrie Drive	Modification to developer requirements to require a flood risk assessment (FRA)
AHAWI013	Hawick	Gala Law	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA)
RHA12B	Hawick	Summerfield 1	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA)
RHA13B	Hawick	Summerfield 2	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA)
RHA25B	Hawick	Stirches 2	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA)
RHAWI001	Hawick	Slitrig Crescent	We support the inclusion of FRA in the site requirements
RHAWI009	Hawick	Knitwear Factory	We support the inclusion of FRA in the site requirements. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
<i>RHAWI010</i>	<i>Hawick</i>	<i>Cottage Hospital</i>	Modification to developer requirements to require flood resilient materials.

<i>RHAWI011</i>	<i>Hawick</i>	<i>Factory, Fairhurst Drive</i>	Modification to developer requirements to require flood resilient materials.
<i>RHAWI012</i>	<i>Hawick</i>	<i>St Margaret's & Wilton South Church</i>	Modification to developer requirements to require flood resilient materials.
<i>RHAWI013</i>	<i>Hawick</i>	<i>Former Council Houses, Eastfield Rd</i>	We support the inclusion of FRA in the site requirements
<i>RHAWI014</i>	<i>Hawick</i>	<i>Land on Mansfield Road</i>	We support the inclusion of FRA in the site requirements
<i>RHAWI015</i>	<i>Hawick</i>	<i>Land East of Community Hospital</i>	We support the inclusion of FRA in the site requirements
SHAWI003	Hawick	Burnfoot (Phase 1)	Modification to developer requirements to require a flood risk assessment (FRA)
zEL49	Hawick	Burnfoot	Modification to developer requirements to require a flood risk assessment (FRA)
zEL50	Hawick	Mansfield Road	Modification to developer requirements to require a flood risk assessment (FRA)
zEL52	Hawick	Liddesdale Road	Modification to developer requirements to require a flood risk assessment (FRA)
zEL62	Hawick	Weensland	Modification to developer requirements to require a flood risk assessment (FRA)
zRO8	Hawick	Commercial Road	We support the requirement for FRA in the Planning Brief
AINNE004	Innerleithen	Kirklands/Willowbank II	Modification to developer requirements to require a flood risk assessment (FRA)
<i>RINNE001</i>	<i>Innerleithen</i>	<i>Former Gas Works</i>	Recommend modification: removal of site due to flood risk
SINNE001	Innerleithen	Kirklands II	Modification to developer requirements to require a flood risk assessment (FRA)
TI200	Innerleithen	Kirklands/Willowbank	We support the requirement for FRA in the Planning Brief
zEL16	Innerleithen	Traquair Road East	Modification to developer requirements to require a flood risk assessment (FRA) and to help contribute to the objectives of the River Basin Management Plan
zEL200	Innerleithen	Traquair Road	Modification to developer requirements to require a flood risk assessment (FRA)
zRO9	Innerleithen	High Street Gap Site	Modification to developer requirements to require a flood risk assessment (FRA)
AJEDB005	Jedburgh	Wildcat Gate South	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA)
AJEDB010	Jedburgh	Queen Mary Building	We support the requirement for FRA in the Planning Brief

RJ27D	Jedburgh	Wildcat Cleuch	Modification to developer requirements to require a flood risk assessment (FRA) and to help contribute to the objectives of the River Basin Management Plan
RJEDB001	Jedburgh	The Anna	We support the inclusion of FRA in the site requirements. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
<i>RJEDB002</i>	<i>Jedburgh</i>	<i>Riverside Mill</i>	We support the inclusion of FRA in the site requirements
zEL33	Jedburgh	Edinburgh Road	Modification to developer requirements to require a flood risk assessment (FRA)
zEL34	Jedburgh	Bankend South Industrial Estate	Modification to developer requirements to require a flood risk assessment (FRA)
zEL35	Jedburgh	Bongate South	Modification to developer requirements to require a flood risk assessment (FRA)
zEL37	Jedburgh	Bongate North	Modification to developer requirements to require a flood risk assessment (FRA)
BKELS003	Kelso	Wooden Linn	We support the inclusion of FRA in the site requirements. Modification to developer requirements to help contribute to the objectives of the River Basin Management Plan
BKELS005	Kelso	Pinnaclehill Industrial Estate	Modification to developer requirements to require a flood risk assessment (FRA)
DKELS001	Kelso	New Kelso High School	We support this site
RKE12B	Kelso	Rosebank 2	We support the inclusion of FRA in the site requirements. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
RKELS002	Kelso	Former Kelso High School	We support this site
zEL206	Kelso	Extension to Pinnaclehill Industrial Estate	Modification to developer requirements to require a flood risk assessment (FRA) and to help contribute to the objectives of the River Basin Management Plan
ALAUD001	Lauder	West Allanbank	We support the inclusion of FRA in the site requirements. Modification to require the development layout to minimise risk of nuisance from co-location with a regulated poultry unit
BLAUD002	Lauder	North Lauder Industrial Estate	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA)
RLAUD002	Lauder	Burnmill	We support the inclusion of FRA in the site requirements. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan

zEL61	Lauder	Lauder Industrial Estate	Modification to developer requirements to require a flood risk assessment (FRA)
EM32B	Melrose	Dingleton Hospital	Modification to developer requirements to require a flood risk assessment (FRA)
EM4B	Melrose	The Croft	We support the requirement for a FRA in the Planning Brief. Modification to developer requirements to help contribute to the objectives of the River Basin Management Plan
ANEWC010	Newcastleton	Newcastleton West	Recommend modification: removal of site due to flood risk
MNEWC001	Newcastleton	Caravan Site	We support the inclusion of FRA in the site requirements
RNE2B	Newcastleton	South of Holmhead	Modification to developer requirements to require a flood risk assessment (FRA)
ANEWT005	Newtown St Boswells	Newtown Expansion Area	We support the inclusion of FRA in the site requirements
BNEWT001	Newtown St Boswells	Tweed Horizons Expansion	We support the inclusion of FRA in the site requirements. Modification to developer requirements to help contribute to the objectives of the River Basin Management Plan
ENT4B	Newtown St Boswells	Melrose Road	Modification to developer requirements to require a flood risk assessment (FRA)
AOXTO001	Oxton	Station Yard	We support the inclusion of FRA in the site requirements. Modification to developer requirements to help contribute to the objectives of the River Basin Management Plan. We would advise to minimise nuisance from proximity to with sewage works
<i>APEEB021</i>	<i>Peebles</i>	<i>Housing south of South Park</i>	We support the inclusion of FRA in the site requirements
APEEB031	Peebles	George Place	We support the inclusion of FRA in the site requirements. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
<i>APEEB041</i> <i>Change of boundary</i>	<i>Peebles</i>	<i>Violet Bank II</i>	We have specific comments to make about this site in relation to flood risk. In addition we would request a modification to developer requirements to help contribute to the objectives of the River Basin Management Plan
RPEEB002	Peebles	George Street	We support the inclusion of FRA in the site requirements. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
RPEEB003	Peebles	Twedbridge Court	We support the inclusion of FRA in the site requirements. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
SPEEB003	Peebles	South West of Whitehaugh	Modification to developer requirements to require a flood risk assessment (FRA)

SPEEB004	Peebles	North West of Hogbridge	We support the inclusion of FRA in the site requirements
SPEEB005	Peebles	Peebles East (South of the River)	We support the inclusion of FRA in the site requirements. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
TP200	Peebles	Violet Bank Field	We support the inclusion of FRA in the site requirements
TP7B	Peebles	Whitehaugh	Modification to developer requirements to require a flood risk assessment (FRA). Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
zEL2	Peebles	Cavalry Park	Modification to developer requirements to require a flood risk assessment (FRA)
BR6	Reston	Rear of Primary School	Modification to developer requirements to require a flood risk assessment (FRA) and to help contribute to the objectives of the River Basin Management Plan
<i>MREST001</i>	<i>Reston</i>	<i>Auction Mart</i>	If a development comes forward for this site that differs from that consented, then we require Modification to developer requirements to require a flood risk assessment (FRA)
SREST001	Reston	Reston Longer Term 1	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA) and to help contribute to the objectives of the River Basin Management Plan
SREST002	Reston	Reston Longer Term 2	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA)
AROB003	Roberton	Site adjacent to Kirk'oer	Modification to developer requirements to help contribute to the objectives of the River Basin Management Plan
ASELK006	Selkirk	Philiphaugh Steading	We support the inclusion of FRA in the site requirements
ASELK021	Selkirk	Philiphaugh North	Modification to developer requirements to help contribute to the objectives of the River Basin Management Plan
BSELK001	Selkirk	Riverside 7	Modification to developer requirements to require a flood risk assessment (FRA). Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
BSELK002	Selkirk	Riverside 5	Modification to developer requirements to require a flood risk assessment (FRA). Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
BSELK003	Selkirk	Riverside 8	Modification to developer requirements to require a flood risk assessment (FRA) unless included in the Supplementary Guidance to be produced for this site. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan

ESE10B	Selkirk	Linglie Road	Modification to developer requirements to require a flood risk assessment (FRA). Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
RSELK001	Selkirk	Forest Mill	We support the inclusion of FRA in the site requirements
<i>RSELK004</i>	<i>Selkirk</i>	<i>Souter Court</i>	Modification to developer requirements to require flood resilient materials. Modification to developer requirement to help contribute to the objectives of the River Basin Management Plan
zEL11	Selkirk	Riverside 2	Modification to developer requirements to require a flood risk assessment (FRA)
zEL15	Selkirk	Riverside 6	Modification to developer requirements to require a flood risk assessment (FRA)
zRO200	Selkirk	Philiphaugh Mill	Recommend modification: removal of site due to flood risk
RSP3B	Sprouston	Teasel Bank	Modification to developer requirements to require a flood risk assessment (FRA)
ASTOW022	Stow	Craigend Road	We support the inclusion of FRA in the site requirements
MSTOW001	Stow	Royal Hotel	Modification to developer requirements/ Planning Brief to require a flood risk assessment (FRA)
AWALK005	Walkerburn	Caberston Farm Land II	We support the inclusion of FRA in the site requirements
zR200	Walkerburn	Caberston Farm/Old Mill Site	We support the inclusion of FRA in the site requirements
AWEST009	West Linton	Robinsland Steading	Modification to developer requirements to require a flood risk assessment (FRA)
zEL18	West Linton	Deanfoot Road	Modification to developer requirements to require a flood risk assessment (FRA)
EY5B	Yarrowford	Minchmoor Road East	We support the inclusion of FRA in the site requirements

