# Summary of Responses to Public Consultation

# Tay Local Plan District

No	Respondent	Brief Summary of Issues Raised	Lead Authority Comments
1	Member of the public	Noted flooding in some areas of Perth City and Bridge of Earn; that package of proposed objectives was too vague; wanted to hear more about maintenance, river dredging, use of beavers, flooding of set aside agricultural land, etc; work should begin immediately.	The Tay Local FRM Plan includes various actions for both Perth and Bridge of Earn, including flood studies and a surface water management plan. More detail on the objectives and actions – including timescales - has been provided in the final published Plan. The Plan will also include maintenance actions.
2	Member of the public	A member of the public in Perth is concerned that their property has flooded multiple times because of heavy rain and blocked drains. They are concerned that this will happen again.	The Tay Local FRM Plan includes various actions to manage the risk of flooding including various flood studies, a surface water management plan and maintenance works. Perth & Kinross Council's Roads Maintenance Partnership carry out maintenance of road drainage systems. Road defects (including blocked gullies) can be reported to the Council via their website.
3	Member of the public	A resident of Wallace Crescent and Fairfield, Perth expressed concern that this area is not mentioned, despite previous repeated flooding of their property. They are looking for reassurance that this will be considered. They expressed concern about development in the area, the lack of upgrades or improvements to the existing drainage system and the time required for improvements.	This area is located within the Perth PVA (02/08/12) and Objective Target Area (OTA) 253. The proposed Tay Local FRM Plan includes specific actions for the area that are intended to bring about a reduction in flood risk. These actions include the on-going Perth SWMP. Perth & Kinross Council also invested in road drainage improvements on Wallace Crescent in 2021 to reduce the risk of flooding.

4	Member of the public	A resident in Aberfeldy is concerned about the visual impact and access issues associated with the proposal to build a flood wall as part of the Aberfeldy Flood Scheme. The respondent noted involvement in the local community resilience plan and in reporting blocked street drains to the local authority.	The Tay Local FRM Plan includes an action for a new flood protection scheme in Aberfeldy. Any issues associated with visual impact and access will be addressed during the outline design of the flood scheme via further public consultation and the Environmental Impact Assessment. In the meantime, the Council welcomes local efforts to improve flood resilience in Aberfeldy.
5	Member of the public	A local resident who lives next to the Craigie Burn in Perth flooded last year and expressed concern that flooding has become more frequent. They requested quick action be taken by pumping water away, noting issues with surface water, sewer flooding, issues with flood gates, property insurance costs, SUDS and storage ponds. They have taken steps to protect their home and liaise with local councillors.	The Tay Local FRM Plan includes actions to manage flood risk in this area (the Perth PVA 02/08/12 and OTA 253), including the on-going maintenance of the existing Perth Flood Scheme, the on- going Craigie Burn Flood Study and the Perth SWMP. The Plan also includes self- help and awareness raising actions. It is individual property owners' responsibility to protect themselves and their assets from flooding.
6	Member of the public	A resident in Craigie, Perth noted concern that development has increased flood risk and that the objective should include infrastructure upgrades. They noted that some maintenance work has helped matters but more requires to be done. The resident noted that they have previously raised issues, but they have not been acted on, and suggested a community meeting. They also note that they monitor flooding in the Craigie area and have reported this to the Council.	The Tay Local FRM Plan includes actions to manage flood risk in this area (the Perth PVA 02/08/12 and OTA 253), including the on-going maintenance of the existing Perth Flood Scheme, the on- going Craigie Burn Flood Study, and the Perth SWMP. The Council has already undertaken public consultation in connection with these issues. The proposed Plan also includes other actions including: • Land Use Planning - all new development is required to comply with national and

			<ul> <li>local planning policies, the Council's Supplementary Guidance and to include SUDS to manage surface water.</li> <li>Maintenance - of watercourses, road drainage and existing flood defences.</li> <li>The Council welcomes local efforts to improve flood resilience in Perth.</li> </ul>
7	Member of the public	A local resident in Blairgowrie & Rattray noted that localised flooding in rural Perthshire could be mitigated in a cost-effective way by improved ditch and verge maintenance. The resident noted the proposed actions and timescales are 'non-committal' and won't be adhered to. They have carried out their own verge maintenance works.	The Tay Local FRM Plan includes maintenance of watercourses. Perth & Kinross Council's Flooding team inspect and assess bodies of water and carry out clearance and repair works, where this will substantially reduce flood risk. The primary responsibility for avoiding or managing flood risk remains with landowners. Actions and timescales will be set out in the published Plan and interim and final reports will also be published setting out the progress made. The Council welcomes local efforts to improve flood resilience in Blairgowrie & Rattray.
8	Member of the public	A local resident in Alyth noted two floods in 6 years and expressed concern about waiting until 2028 for a plan to be made. They noted the action taken by the local community to protect properties but noted that the Council should do more. They also noted the need for more radical action to prevent flooding by creating an artificial flood plain to the north of the town.	The Tay Local FRM Plan includes a number of on-going actions to manage flood risk in Alyth. In particular, Perth & Kinross Council are currently undertaking a Natural Flood Management (NFM) Study in Alyth. The study will explore the potential options for flood risk management measures in this area, including NFM and flood storage.
9	Member of the public	A local resident in Blairgowrie and Rattray noted that the timescales for	The Tay Local FRM Plan will set out the current timescales for actions in Blairgowrie and

10	Member of the public	actions are not quick enough. A member of the public in Pitlochry agreed that the main communities and	Rattray. This area is currently the focus of an on-going surface water management plan which will consider the potential means of managing and, where achievable, reducing flood risk in this area. No response required.
		infrastructure had been identified and with the proposed objectives for this area.	
11	Member of the public	A member of the public noted that Dunning was not listed in the consultation.	Dunning was included within PVA 08/16 in the Cycle 1 FRM Plans, however, following the 2 <sup>nd</sup> national flood risk assessment in 2018, this area has been re-assessed as having a lower level of flood risk. Dunning is therefore no longer designated as a PVA. However, the area is covered by the proposed LPD-wide actions set out in the Tay Local FRM Plan.
12	Member of the public	<ul> <li>A member of the public in Coupar Angus noted that:</li> <li>flood risk is preventing development and that development elsewhere has increased flood risk;</li> <li>watercourses are flowing slower due to overgrown vegetation and silt.</li> <li>the A93 road should be raised to prevent road closures and delayed emergency access due to flooding.</li> <li>flood defences would prevent flooding in Coupar Angus but this would move the problem elsewhere.</li> </ul>	The Tay Local FRM Plan includes actions to manage flood risk in this area, including the land use planning action. All new development is required to comply with national and local planning policies, the Council's Supplementary Guidance and to include SUDS to manage surface water. Perth & Kinross Council's Flooding team inspect and assess bodies of water and carry out clearance and repair works where this will substantially reduce flood risk. The primary responsibility for avoiding or managing flood risk remains with landowners. The Council's previous flood study considered the potential options for reducing flood risk

			in Coupar Angus but unfortunately did not identify an economically viable flood scheme. Flood risk will therefore continue to be managed as set out in the Tay Local FRM Plan.
13	Member of the public	<ul> <li>A member of the public in Perth noted:</li> <li>8 flood events on the Craigie Burn since 1981;</li> <li>concern about increased flood risk due to development and global warming;</li> <li>the lack of scope for improving existing flood defences, e.g. bottlenecks and culverts in the Craigie Burn, and the limited benefit of maintenance works;</li> <li>that the pace of FRM is too slow to keep pace with the increased frequency of flooding;</li> <li>that local residents need to be kept informed of any local works;</li> <li>the on-going risk to property and people and the associated costs; and</li> <li>it is the public authorities job to manage flood risk.</li> </ul>	The Tay Local FRM Plan includes actions to manage flood risk in this area (the Perth PVA 02/08/12 and OTA 253) and in particular the on- going maintenance of the existing Perth Flood Scheme, the on-going Craigie Burn Flood Study and the Perth SWMP. The Council has already undertaken public consultation in connection with these issues and the associated timescales. The Plan also includes other actions including: • Land Use Planning - all new development is required to comply with national and local planning policies, the Council's Supplementary Guidance and to include SUDS to manage surface water. • Maintenance - of watercourses, road drainage and existing flood defences. While certain public authorities have a duty to manage and, where achievable, reduce flood risk overall, the primary responsibility for avoiding or managing flood risk remains with land and property owners.
14	Member of the public	A member of the public in Perth noted the increasing frequency of flooding; the increase in flood risk due to development; the need to improve drainage and not rely on existing drainage or	The Tay Local FRM Plan includes actions to manage flood risk in this area (the Perth PVA 02/08/12 and OTA 253) and, in particular, the on- going maintenance of the existing Perth Flood Scheme,

		watercourses such as the Craigie Burn; the need for improved communication on actions being taken; that the scale of the flooding over the last 20 years has been understated; that the timescales for action are too slow and that interim changes are also required.	the on-going Craigie Burn Flood Study and the Perth SWMP. The Council has already undertaken public consultation in connection with these issues and the associated timescales. The Plan also includes other actions including: • Land Use Planning - all new development is required to comply with national and local planning policies, the Council's Supplementary Guidance and to include SUDS to manage surface water. • Maintenance - of watercourses, road drainage and existing flood defences.
15	Member of the public	<ul> <li>A local resident in Perth noted:</li> <li>that flooding wasn't happening 'once every 200 years' – there had been 8 flood events on the Craigie Burn since 1981;</li> <li>concern about increased flood risk due to development;</li> <li>concern about how SUDS operate and if they deal with older development;</li> <li>concern about flooding on the Craigie Burn due to small culverts and blockages and the impact on flooding of adjacent properties;</li> <li>concern that dredging of the Craigie Burn increases flood risk downstream;</li> <li>disappointment that Perth &amp; Kinross Council appear to be blaming</li> </ul>	The Tay Local FRM Plan includes actions to manage flood risk in this area (the Perth PVA 02/08/12 and OTA 253) and in particular the on- going maintenance of the existing Perth Flood Scheme, the on-going Craigie Burn Flood Study and the Perth SWMP. The Council has already undertaken public consultation in connection with these issues and the associated timescales. The Plan also includes other actions including: • Land Use Planning - all new development is required to comply with national and local planning policies, the Council's Supplementary Guidance and to include SUDS to manage surface water. • Maintenance - of watercourses, road

		<ul> <li>householders for the flooding, while allowing development further upstream;</li> <li>the damage done due to surface water flooding; and;</li> <li>that action to manage flood risk is too slow – flooding is more frequent; and</li> <li>that more communication is required from the Council.</li> </ul>	drainage and existing flood defences. While certain public authorities have a duty to manage and, where achievable, reduce flood risk overall, the primary responsibility for avoiding or managing flood risk remains with land and property owners.
16	Member of the public	A local resident on the Cavendish Avenue area of Perth noted concern about increasing flooding and health impacts due to the limited capacity of the sewer system outside their property and development elsewhere in the catchment. This has been an issue for 15-16 years, and they feel that the sewer requires to be upgraded. The resident doesn't feel able to act as this may increase flood risk to adjacent properties.	The Tay Local FRM Plan includes actions to manage flood risk in this area (the Perth PVA 02/08/12 and OTA 253). In particular, there is an on-going IFOS (Internal Flooding due to Overloaded Sewers) study being carried out jointly between Scottish Water and Perth and Kinross Council to consider the potential means of managing and, where achievable, reducing flood risk to properties in the vicinity of Cavendish Avenue. Community drop-in sessions will be held early in 2023 to disseminate the findings of this study.
17	Member of the public	A member of the public in the Tomcroy Terrace area of Pitlochry noted concern that the flood map omits to show the flood risk to their neighbours property, which has been affected twice by an adjacent small burn and surface water run off from fields. They noted they may be able to help the local community resilience group.	SEPA's indicative flood maps do not always show flooding on small watercourses (due to their limited catchment size). Tomcroy Terrace is affected by flooding from the Wester Kinnaird Burn which was fully considered by the more detailed modelling work carried out under the Pitlochry Flood Study. The study recommended a new watercourse diversion channel on the Wester Kinnaird Burn at

			Tomcroy Terrace, as part of the wider proposals for a flood scheme in this area. The proposed scheme is included as one of the actions for this area (the Pitlochry PVA 02/08/02 and OTA 254) in the Tay Local FRM Plan. The Council welcomes local efforts to improve flood resilience in Pitlochry.
18	Member of the public	A member of the public noted concern about an increase in flood risk due to development.	The Tay Local FRM Plan includes actions to manage flood risk, including the land use planning action. All new development is required to comply with national and local planning policies, the Council's Supplementary Guidance and to include SUDS to manage surface water.
19	Member of the public	A member of the public in Comrie agreed that the main communities and infrastructure had been identified and agreed with the proposed objectives for this area.	No response required.
20	Member of the public	A member of the public in Bridge of Earn is concerned that the Oudenarde and Brickhall industrial sites are not included within the objective target area (OTA). They noted concern about the proposed objectives don't include tributaries to the River Earn, and need to address the flat topography which limits surface water drainage. They also noted concern that the timescales for actions were too long.	The Tay Local FRM Plan includes actions to manage flood risk in Bridge of Earn (PVA 02/08/14 and OTA 205). The development site at Oudenarde and the Brickhall Industrial site both fall outwith OTA 205, although they are within PVA 02/08/14. The flood risk on these sites is being managed through the land use planning action which applies across the whole of the local plan district. The proposed objectives do not mention any watercourses but instead refer to the management of flood risk. Flood risk from any bodies of water and their tributaries will therefore be considered. The Deich and Yellow Burns have

			been noted against the 'Maintain flood protection scheme' action. The Plan also includes a Flood study to better understand the integrated flooding mechanisms in Bridge of Earn (including surface water) and the potential works required to reduce flood risk in the future. The timescales for all of these actions have been set out in the published Plan.
21	Member of the public	A member of the public noted that all vulnerable areas should be identified, and this should not be limited to affected houses, but should also include infrastructure. They note that Forgandenny isn't included, despite previous flooding, and that the flood risk maps do not show previous flooding. They noted that support is required from both Perth and Kinross Council and SEPA and noted concern that current legislation does not force rural landowners to cooperate on natural flood measures within their land.	The potentially vulnerable areas (PVA's) were set out in the second national flood risk assessment, published in December 2018. This assessment considered homes, businesses and infrastructure. Forgandenny is not within one of the areas designated as a PVA in 2018. Even though there has been previous flooding, the level of flood risk is not significant enough for this area to be included within a PVA. SEPA's indicative flood maps do not always show flooding on small watercourses (due to their limited catchment size). Notwithstanding the above, actions have been set out in the Tay Local FRM Plan to manage flood risk across the local plan district and these apply to Forgandenny. While current legislation does not force rural landowners to undertake flood measures on their land, landowners remain responsible for managing or avoiding flood risk.
22	Member of the public	A member of the public in Coupar Angus agreed that the main communities and	No response required.
		infrastructure had been identified and agreed with	

		the proposed package of	
		objectives.	
23	Local business	A local business owner in Aberfeldy noted that the underlying causes of flooding (the mismanagement of the moorlands in Highland Perthshire) have not been fully addressed. Work and legislation should be introduced immediately. They noted that banning grouse shooting, stopping muir burning and moorland ditchwork, and tree planting would help.	The Tay Local FRM Plan includes actions to manage flood risk in Aberfeldy (PVA 02/08/03 and OTA 183). This area was fully considered by the Aberfeldy Flood Study which was completed in 2019. The study considered a long list of options (including land management techniques) and recommended a flood scheme involving new flood defences in the town. The study findings were disseminated to the local community via drop-in sessions on 20 and 25 June 2019.
24	Community body	Earn Community Council agreed that the main communities and infrastructure had been identified and agreed with the proposed objectives, actions and timescales for the Bridge of Earn area. The community council noted that the local community can help to limit surface water runoff due to monoblocking/ surfacing of private land and by implementing natural flood management.	Perth and Kinross Council welcomes local efforts to improve flood resilience in Bridge of Earn.
25	Other organisation	A group of 72 healthcare professionals in Tayside and North Fife issued an open letter to Tayside and Fife Councillors, in support of climate mitigation for public health. The group are concerned that the worsening climate crisis is a public health emergency, due to several factors including worsening extreme weather, such as heavy rain and flooding. Creating green and blue	The publication of the second Tay Local FRM Plan is one of the key actions to help us adapt to climate change. As a society, we need to take action to manage the risk of flooding and its impacts on our lives, recognising that the risk can't ever be removed entirely. This plan takes our knowledge and understanding of flooding and the impacts of climate change and turns it into a set of actions that are planned, prioritised and co-ordinated to

		spaces can provide health benefits; adaptation is required to cope with increased rainfall, and the risk of flooding as climate change worsens.	tackle flooding in the communities where it affects us the most. Flooding needs to be managed sustainably so that flood risk is reduced without moving the problem elsewhere. It must be done in a way that contributes to the health and wellbeing of communities, supports the protection and regeneration of the environment, improves resilience to climate change and enables a sustainable economy. Actions are needed on all sources of flooding – including from rivers, the sea, surface water and groundwater – to meet the needs of present and future generations while also protecting and enhancing the environment.
26	Other organisation	NatureScot noted that they had previously contributed to the 2018 NFRA consultation and were in general agreement with this consultation. They provided various detailed comments on the proposed actions in various OTA's and the need for an HRA to cover some of these, due to on-going and proposed actions within Special Areas of Conservation (SAC). NatureScot also reiterated that Natural Flood Management (NFM) should be used where possible to reduce flood risk.	NatureScot's comments will inform the various future actions to be taken on flood risk. The Council has undertaken a Habitats Regulations Assessment as part of development of the Tay Local FRM Plan and has consulted with NatureScot on this. NFM is considered in the development of the Tay Local FRM Plan and in the long list of actions considered as part of any individual flood studies.
27	Elected members	Two of the Ward 10 elected members) in Perth & Kinross Council noted concern about various flooding issues in Perth including:	The Tay Local FRM Plan on- going includes actions to manage flood risk in this area (the Perth PVA 02/08/12 and OTA 253); in particular, the maintenance of the existing Perth Flood Scheme, the

		<ul> <li>Surface water flooding from the M90 motorway and the Broxden Park &amp; Ride facility;</li> <li>Operation of the flood storage ponds at Broxden;</li> <li>Maintenance of the Scouring and Craigie Burns;</li> <li>Arrangements for developers completing works and handing them to the Council for adoption;</li> <li>Flood gate closures on the Perth Flood Scheme;</li> <li>River and surface water flooding at various locations.</li> </ul>	Craigie Burn Flood Study, the Perth SWMP and the Perth IFOS Project. Perth & Kinross Council's Flooding team inspect and assess bodies of water and carry out clearance and repair works where this will substantially reduce flood risk. The Council also works with developers to ensure that any issues are fully addressed prior to adoption. The primary responsibility for avoiding or managing flood risk remains with landowners. A separate detailed response was sent to the elected members by e-mail on 25 January 2022.
28	Local Authorities	Perth & Kinross Council's flooding team made comments specific to various OTA's; provided updates for the prioritisation of proposed Cycle 2 flood schemes and flood protection works; noted concern over the lack of any Scottish Water actions; and suggested that Scottish Foresty/Forestry & Land Scotland should be including objectives and actions within the published FRM Plans. No comment was made by other services within the Council.	N/A

# Tay Estuary & Montrose Basin Local Plan District

No consultation responses were received.

# Forth Local Plan District

No	Respondent	Brief Summary of Issues Raised	Lead Authority Comments
1	Member of the public	A member of the public in Blackford raised concern that their property has been designated as being at risk of flooding from the Danny Burn, despite it not having flooded. They are concerned that this is increasing their buildings insurance.	It is acknowledged that not all properties within the boundary of a PVA or OTA are at risk of flooding. Even though a property may not have flooded, there may still be a risk that flooding could occur in the future in a higher magnitude event. We would need to know which property you are referring to, in order to comment further.
2	Local Authority	Perth and Kinross Council's flooding team provided an update for the prioritisation of the proposed Cycle 2 Blackford Flood Protection Scheme.	No response required.
3	Other Organisation	NatureScot noted the opportunities for joint working on a priority basis.	Perth and Kinross Council will continue to liaise with NatureScot in relation to any flood risk management actions.

## Forth Estuary Local Plan District

No	Respondent	Brief Summary of Issues Raised	Lead Authority Comments
1	Member of the public	A resident in Drum queried why the area wasn't included within a PVA, despite having a large catchment area, limited size of culverts under the A977, a high water table and previous incidences of property flooding. They also raised concern about the impact of development of flood risk	The potentially vulnerable areas (PVAs) were set out in the second national flood risk assessment, published in December 2018. The village of Drum is not within one of the areas designated as a PVA at that time. Even though there has been previous flooding, the level of flood risk is not significant enough for this area

		and noted that action should be taken quickly.	to be included within a designated PVA. Notwithstanding the above, actions have been set out in the proposed Forth Estuary Local FRM Plan to manage flood risk across the local plan district and these apply to Drum. The proposed Forth Estuary Local FRM Plan includes actions to manage flood risk in this area, including the land use planning action. All new development is required to comply with national and local planning policies, Perth & Kinross Council's Supplementary Guidance and to include SUDS to manage surface water.
2	Member of the public	A resident in Milnathort noted concern about a lack of integrated thinking and communication in relation to development and planning enforcement and flood risk. They noted concern about the Athron Hill development having no water or sewage provision, and water draining to the back Burn which floods Milnathort. They noted that prevention in the past would have been better than reacting to crises in the future.	The proposed Forth Estuary Local FRM Plan includes actions to manage flood risk in this area, including the land use planning action. All new development is required to comply with national and local planning policies, the Council's Supplementary Guidance and to include SUDS to manage surface water.
3	Community Body	The Kinross Flood Resilience Group submitted 21 questions relating to FRM work in Kinross including timescales, barriers to commencement, publication of the Local FRM Plan, funding, cost/benefit analysis, which authorities are responsible, SEPA's on-going involvement, communications, notice	The responsibilities for delivery, timescales, coordination, and funding arrangements for FRM actions in Kinross will be set out in the Forth Estuary Local FRM Plan which is due for publication in December 2022. The published Plan will include an action for the South Kinross Flood Protection Scheme and further details will be provided to the local community via

		periods, access to private property, and the proposed details for the South Kinross Flood Scheme including consultation on the flood scheme, property insurance, contact details and temporary flood risk during construction. They agreed with the proposed actions but noted that expansion of the waterways (both natural and piped) would also benefit the area. The group noted that they can respond during a flood and could do so more effectively with support from PKC and the Community Council. They are considering use of the 'Rivertrack' water level monitoring system and they noted monitoring drains in the area, with a view to getting them cleared more effectively.	public consultation in due course. Perth & Kinross Council's Flooding team inspect and assess bodies of water and carry out clearance and repair works where this will substantially reduce flood risk. The primary responsibility for avoiding or managing flood risk remains with landowners. The proposed Forth Estuary Local FRM Plan includes a Community resilience group action and the Council will continue to liaise with the group on this. The Plan also includes an emergency plans action, which enables the provision of an emergency response during flood events. Perth and Kinross Council welcomes local efforts to improve flood resilience in Kinross.
4	Elected member	A Ward 8 elected member from Perth & Kinross Council noted concern that the village of Drum had not been included within a PVA despite a high water table and previous flooding in the area. They also noted concern about development and flood risk, the WWTW capacity, and suggested a ditch management scheme for the area.	The potentially vulnerable areas (PVA's) were set out in the second national flood risk assessment, published in December 2018. The village of Drum is not within one of the areas designated as a PVA at that time. Even though there has been previous flooding, the level of flood risk is not significant enough for this area to be included within a designated PVA. The proposed Forth Estuary Local FRM Plan includes actions to manage flood risk in this area, including the land use planning action. All new development is required to comply with national and local planning policies, the Council's Supplementary Guidance and

to include SUDS to manage
surface water.
Perth & Kinross Council's
Flooding team inspect and
assess bodies of water and
carry out clearance and repair
works where this will
substantially reduce flood risk.
The primary responsibility for
avoiding or managing flood
risk remains with landowners.