

PERTH AND KINROSS COUNCIL

Environment Committee

9 September 2015

THE FLOOD RISK MANAGEMENT (SCOTLAND) ACT 2009 SELECTED ACTIONS AND PRIORITISATION

Report by Depute Director (Environment)

The Council's duties with regard to flooding are set out within the Flood Risk Management (Scotland) Act 2009. This report provides a further update on progress towards the publication of the Council's local flood risk management plans in 2016. It seeks the Committee's approval of the actions that have been selected to manage flood risk and the assessment of their national priority. The report also provides an update on the response to the recent joint public consultation on the draft flood risk management strategies and local flood risk management plans.

1. BACKGROUND / MAIN ISSUES

- 1.1 The Flood Risk Management (Scotland) Act 2009 (the 2009 Act) has introduced a more modern, coordinated and sustainable approach to flood risk management at both national and local levels.
- 1.2 Although the public authorities are expected to take a proactive role in managing and, where achievable, lowering flood risk, the primary responsibility for avoiding or managing flood risk still remains with land and property owners. The 2009 Act does not alter this. Individuals, businesses and communities must, therefore, play a critical role in making themselves more resilient and helping to reduce the impact of flooding.
- 1.3 The 2009 Act sets out a framework designed to manage and reduce flood risk across Scotland over time. Local authorities, SEPA and Scottish Water have duties to work together to produce a national flood risk assessment, flood risk and hazard maps, flood risk management strategies, and local flood risk management plans. This process of risk assessment, mapping and planning is to be repeated every six years.

Selected Actions

- 1.4 The progress made on the Flood Risk Management (FRM) process was reported to the Environment Committee on 12 November 2014 (Report No. 14/483 refers) and 21 January 2015 (Report No.15/16 refers). The proposed short list of potential measures to manage flood risk was also approved by the Environment Committee at that time.
- 1.5 A detailed appraisal of the approved short list of measures is required. This is to determine the selected actions for the final Flood Risk Management Strategies and the Local Flood Risk Management Plans and inform the future prioritisation of those actions.

- 1.6 It is important that a range of actions to reduce flood risk are considered in this appraisal process. This includes general actions which are likely to be common to all Potentially Vulnerable Areas (PVAs) but also those actions that are specific to individual PVAs and are required to tackle a particular source of potential flooding. Existing actions to manage flood risk are also included so that their benefit may be considered.
- 1.7 The general actions common to all Potentially Vulnerable Areas include the maintenance of any existing flood schemes, land use planning, watercourse clearance and repair, individual property flood measures, flood forecasting and warning, self help (including awareness raising) and links with emergency planning. Links with communities and emergency planning already exist through the Council's internal civil contingencies steering group and involvement in the multi-agency community resilience group.
- 1.8 The specific actions include:-
- (i) Flood Protection Schemes or Works
 - (ii) Flood Study – there are two types:
 - Flood Protection Study
 - Natural Flood Management (NFM) Study
 - (iii) Surface water flooding will be managed separately from the Flood Risk Management process in some areas through:
 - Integrated Catchment Studies (ICS)
 - Surface Water Management Plans (SWMP)
 - (iv) Flood Forecasting and Warning
 - (v) Improved understanding (improvements to strategic flood maps).
- 1.9 A detailed description of these specific actions is provided in Appendix A.
- 1.10 Once the most appropriate and sustainable actions have been selected for the Flood Risk Management Strategies and Local Flood Risk Management Plans, they will be prioritised to determine their order of implementation.

Prioritisation

- 1.11 Under the 2009 Act, SEPA are required to indicate the priority given to each action and to identify the appropriate 6 year planning cycle for implementation. This will ensure that Government investment is targeted where it will deliver the greatest benefit.
- 1.12 The prioritisation has been undertaken by SEPA, using data generated and gathered via their three regional appraisal contracts, supplemented with additional detailed study reports provided by local authorities in support of proposed schemes and works.

- 1.13 The prioritisation methods used provide a transparent and rigorous risk-based approach, drawing on data gathered to date through the Flood Risk Management planning process.
- 1.14 The prioritisation has been undertaken at a national level, and rankings also presented at local plan district and local authority levels. Rankings at all three levels have been presented for each prioritised action. The actions have been grouped into the following categories:-
- Flood Protection / Natural Flood Management Schemes and Works
 - Flood Protection / Natural Flood Management Studies
 - Flood Warning
 - Improved understanding
- 1.15 Detailed prioritisation has been undertaken by SEPA for flood schemes and studies. In both cases, economic indicators have initially been used to rank the actions and then a series of environmental and social criteria used to adjust that initial order.
- 1.16 Flood schemes and works have mainly been ranked in order of benefit / cost ratio. They have also been categorised to reflect the level of confidence in the benefit / cost data provided by local authorities. Those schemes with a lower confidence assessment are not given a position within the prioritisation and will require further investigation. The inclusion of a confidence criterion seeks to achieve best value for capital funding.
- 1.17 The risk of surface water flooding will be managed separately from the Flood Risk Management process in some areas through integrated catchment studies and surface water management plans. The agreed surface water management priority areas were previously reported to the Environment Committee of 12 November 2014 (Report No.14/483 refers) and are:
- Perth
 - Invergowrie
 - Milnathort
 - Scone
 - Blairgowrie
- 1.18 Work on the Perth Integrated Catchment Study is about to commence in partnership with Scottish Water. Invergowrie is covered by the Tayside Integrated Catchment Study, which covers the sewer catchment area to the west of Dundee. The Council is currently participating in this study.
- 1.19 Work on the remaining surface water priority areas is anticipated to commence at a later stage in the initial 6 year planning cycle.
- 1.20 Any actions that are identified in these studies and plans to manage surface water flooding will be included in future Flood Risk Management Strategies and Local Flood Risk Management Plans.

- 1.21 A National Prioritisation Working Group has been set up to oversee the prioritisation process. This group is being chaired by the Scottish Government, and consists of representatives from local authorities, SEPA, Scottish Water, and COSLA. The Group is currently expected to conclude its work in August 2015.

Response to Public Consultation

- 1.22 It is essential that any action taken on flooding is informed by the best available data. The 2009 Act therefore required that the draft Flood Risk Management Strategies and corresponding supplementary parts of Local Flood Risk Management Plans be put to public consultation by 22 December 2014. SEPA and the lead local authorities were required to coordinate their consultation arrangements during the production of these documents.
- 1.23 The previous report to the Environment Committee on 21 January 2015 (Report No.15/16 refers) noted that delays have required SEPA to consult on a draft short list of measures instead of the final selected measures. The detailed appraisal of measures was therefore carried out at the same time as the public consultation. SEPA plan to address this by reviewing the selected actions in light of the responses to the public consultation and amending the Flood Risk Management Strategies accordingly.
- 1.24 The public consultation was delivered through a phased approach which was approved by the Scottish Ministers. The first phase commenced on 22 December 2014 and the second on 2 March 2015. The consultation closed on 2 June 2015.
- 1.25 The consultation was a web based exercise carried out jointly with SEPA and the other responsible authorities.
- 1.26 The response was limited with only four external responses being received by the closing date (from two Community Councils and from two Businesses). A brief summary of responses is provided in Appendix B. The response across Scotland also seems to have been very limited.
- 1.27 As required by the 2009 Act, the responses have been collated and sent to SEPA. They will inform the final Flood Risk Management Strategies and Local Flood Risk Management Plans due for publication in December 2015 and June 2016 respectively.

2. PROPOSALS

Selected Actions

- 2.1 SEPA have completed a detailed appraisal of the approved short list of measures. This is in order to select the most appropriate and sustainable actions for the final Flood Risk Management Strategies and Local Flood Risk Management Plans and to inform the prioritisation of those actions.
- 2.2 The final selected actions have been identified by SEPA and their consultants, CH2M Hill, in consultation with Council Officers.

- 2.3 Details of the selected actions for the four Local Plan Districts (LPDs) that Perth & Kinross Council is involved in are summarised in Table 1 below.

Local Plan District (LPD)	Potentially Vulnerable Area (PVA)	Location	Selected Action
Tay Estuary	07/12	Invergowrie	Integrated Catchment Study (ICS) & Natural Flood Management (NFM) Study
Tay	08/03	Pitlochry Aberfeldy Weem	Flood Protection Study Flood Protection Study Maintain Existing Flood Scheme
	08/04	Alyth	NFM Study
	08/06	Blairgowrie	Surface Water Management Plan (SWMP)
	08/07	Coupar Angus	General Actions
	08/08	Luncarty Stanley Bankfoot Dunkeld	General Actions General Actions General Actions Flood Protection Study
	08/10	Almondbank	Almondbank Flood Protection Scheme (currently underway)
	08/11	Scone	Flood Protection Scheme (Annaty Burn), NFM Study & SWMP
	08/12	Perth to Kinfauns	ICS
	08/13	Perth Centre	ICS & Flood Protection Study (Craigie Burn)
	08/14	Comrie	Flood Protection Scheme
	08/17	Bridge of Earn	General Actions Maintain Existing Flood Scheme
Forth	09/12	Blackford	Flood Protection Study & NFM Study
Forth Estuary	10/04	Kinross	Flood Protection Scheme (South Queich, Gelly Burn & Clash Burn)
		Milnathort	Flood Protection Scheme (surface water)

Table 1 - Selected Actions

- 2.4 Where appropriate, the general actions described at 1.7 will also apply to the above Potentially Vulnerable Areas.
- 2.5 Studies for Coupar Angus and Bankfoot have indicated that flood schemes are unlikely to be economically viable. The investigation into the flooding in Bankfoot in July 2015 will be taken into account, and the flooding investigations for these areas will be the subject of future reports to the Environment Committee.

Prioritisation

- 2.6 The selected actions have been prioritised by SEPA and the first version of this list has been discussed at Local Authority workshops with Council officers.

- 2.7 The prioritised list was subsequently revised by SEPA and a second version produced. The rankings for the selected actions within Perth and Kinross are shown in Tables 2 and 3 below on a local authority, Local Plan District (LPD) and national basis.

Local Plan District (LPD)	Location	Ranking		
		Perth & Kinross	LPD	National
Tay	Comrie	1	1	6
Forth Estuary	Milnathort (surface water)	2	1	16
Forth Estuary	South Kinross	3	2	24
Tay	Scone (Annaty Burn)	4	2	31

Table 2 - Flood Protection Schemes

LPD Local Plan District (LPD)	Location	Ranking		
		Perth & Kinross	LPD	National
Tay	Pitlochry	1	2	23
Tay	Aberfeldy	2	3	38
Forth	Blackford	3	3	40
Tay	Dunkeld	4	4	66
Tay	Scone	5	5	71
Tay	Perth (Craigie Burn)	6	6	116

Table 3 - Flood Protection Studies

- 2.8 All of the Council's potential flood schemes have been prioritised and none have been included within the lower confidence category with regard to their benefit / cost ratio.
- 2.9 As well as the Flood Protection Studies noted in Table 3, Natural Flood Management Studies are proposed in Potentially Vulnerable Areas PVA 07/12 (Invergowrie) and PVA 08/04 (Alyth).
- 2.10 SEPA have also confirmed the following with regard to the prioritisation of potential new flood warning schemes:-
- Kinross – this is scheduled for the first Flood Risk Management planning cycle (2016-2022).
 - Coupar Angus and Alyth – this is scheduled after the first Flood Risk Management planning cycle (i.e. after 2022).
- 2.11 SEPA will carry out a further feasibility assessment to determine the potential for delivery of these schemes.

2.12 The priorities for improved understanding are:-

- Pitlochry – SEPA have confirmed that some improvements are required to their strategic modelling of the wider Tay catchment. In particular, there are issues with the modelling around the area of the Tummel Dam and small burns in Pitlochry.
- Bankfoot – some issues were previously reported to the Environment Committee of 21 January 2015 regarding SEPA's flood map for Bankfoot (Report 15/16). This will be considered after the publication of the final Flood Risk Management Strategies in December 2015 and within the wider Tay catchment work noted above.

2.13 SEPA will produce a third version of the prioritisation which will incorporate any relevant responses from the recent public consultation. The fourth and final version will incorporate the comments of the National Prioritisation Working Group and will be submitted to the Scottish Ministers in November 2015.

2.14 Although not a guarantee of funding, the ranking of schemes and works is likely to be a key source of evidence in the funding allocation process.

2.15 It should be noted that it will not be possible to carry out all of the selected actions to manage flood risk within the resources available to the Council at this time. Although actions have been selected, the decisions around implementation will be based on a number of factors, including: priority, availability of funding, capacity within delivery bodies and third parties to develop the actions, coordination and agreements between partners, statutory processes and permissions, design or other preparatory time required.

Next Steps

2.16 At present SEPA are working to finalise their Flood Risk Management Strategies in order to submit them to the Scottish Ministers for approval on 2 November 2015. The final strategies are to be published by 22 December 2015.

2.17 The selected actions and their prioritisation will also form part of the Council's Local Flood Risk Management Plans which are due to be published by 22 June 2016.

3. CONCLUSION AND RECOMMENDATIONS

3.1 This report provides an update on progress towards the publication of SEPA's Flood Risk Management Plans (or strategies) in December 2015 and the Council's Local Flood Risk Management Plans in June 2016.

3.2 The report provides an update on the recent public consultation on the draft versions of those plans.

3.3 The report seeks the Committee's approval of the selected actions and national prioritisation of those actions.

3.4 It is recommended that the Committee:

- (i) Notes the progress on the flood risk management planning process set out by the 2009 Act.
- (ii) Notes the response to the recent public consultation.
- (iii) Approves the proposed selected actions.
- (iv) Approves the prioritisation of those selected actions.

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1. IMPLICATIONS, ASSESSMENTS, CONSULTATION AND COMMUNICATION

Strategic Implications	Yes / None
Community Plan / Single Outcome Agreement	Yes
Corporate Plan	Yes
Resource Implications	
Financial	Yes
Workforce	Yes
Asset Management (land, property, IST)	None
Assessments	
Equality Impact Assessment	Yes
Strategic Environmental Assessment	Yes
Sustainability (community, economic, environmental)	Yes
Legal and Governance	Yes
Risk	None
Consultation	
Internal	Yes
External	Yes
Communication	
Communications Plan	Yes

1. Strategic Implications

Community Plan / Single Outcome Agreement

- 1.1 The proposals relate to the delivery of the Perth and Kinross Community Plan / Single Outcome Agreement by managing flood risk to our residential and business communities in a sustainable manner.

Corporate Plan

- 1.2 The Council's Corporate Plan 2013 – 2018 lays out five outcome focussed strategic objectives which provide clear strategic direction, inform decisions at a corporate and service level and shape resources allocation. They are as follows:
- (i) Giving every child the best start in life;
 - (ii) Developing educated, responsible and informed citizens;
 - (iii) Promoting a prosperous, inclusive and sustainable economy;
 - (iv) Supporting people to lead independent, healthy and active lives; and
 - (v) Creating a safe and sustainable place for future generations.
- 1.3 This report contributes to objectives (ii), (iii), (iv) and (v).

2. Resource Implications

Financial

- 2.1 It should be noted that the selected actions identified in this report will not be implemented at this time. While the actions have now been prioritised, the implementation arrangements will not be finalised until the Council's Local Flood Risk Management (FRM) Plans are published in June 2016. Thereafter, the actions will still require further development through the progression of flood scheme proposals or further flood studies. As a result, there are no immediate resource implications arising directly from the recommendations in this report.
- 2.2 However, the flood risk management planning process will have future financial implications. The Local FRM Plans will include an implementation part (a delivery plan) which will indicate who will be responsible for the actions to manage flood risk, as well as how they will be programmed and funded by the responsible authorities over the six year cycle.
- 2.3 The Scottish Government, COSLA and SEPA are currently in discussions over the distribution of funding to the actions identified nationally in the FRM Strategies and Local FRM Plans. A further update will be provided to the Environment Committee once these proposals are finalised.
- 2.4 Clearly the issue of funding support from central government will continue to have a significant bearing on when the Council will be able to deliver any actions to manage flood risk in the future. In the meantime, the final actions set out in the Council's future Local FRM Plans have been prioritised but will only be implemented as available resources allow.

Workforce

- 2.5 There are no workforce implications arising directly from the recommendations in this report.

Asset Management (land, property, IT)

- 2.6 The proposals in this report have no asset management implications.

3. Assessments

Equality Impact Assessment

- 3.1 Under the Equality Act 2010, the Council is required to eliminate discrimination, advance equality of opportunity, and foster good relations between equality groups. Carrying out Equality Impact Assessments for plans and policies allows the Council to demonstrate that it is meeting these duties.

- 3.2 The function, policy, procedure or strategy presented in this report was considered under the Corporate Equalities Impact Assessment process (EqIA) with the following outcome.
- 3.3 Following an assessment using the Integrated Appraisal Toolkit, it has been determined that the proposal is assessed as **relevant** and the following positive outcomes expected following implementation:
- The selected actions will have the same impact for all equality groups as the reduction in flood risk to communities will provide benefits for all (improved safety, health & wellbeing through the avoidance of flood impacts and damages).
 - The effects and aftermath of flooding could have a greater impact on mobility impaired, sight impaired or blind people, learning disabled people, children, the elderly and infirm, pregnant women or nursing mothers in relation to adverse psychological, physical and health impacts. The selected actions to reduce flood risk described in the report will reduce or remove these impacts.

Strategic Environmental Assessment

- 3.4 The Environmental Assessment (Scotland) Act 2005 places a duty on the Council to identify and assess the environmental consequences of its proposals.
- 3.5 There are likely to be significant environmental effects associated with the Tay Local Flood Risk Management (FRM) Plan and the other three Local FRM Plans that the Council will contribute to. As a consequence an environmental assessment is necessary. SEPA have commenced an environmental assessment for their FRM Strategies and their environmental report was published during the recent public consultation. Following a review of this assessment, it has been confirmed that this will cover the Local FRM Plans and that no further assessment is likely to be required at this time. A screening decision provided by a member of the Tay Estuary and Montrose Basin Local Plan District (LPD) Partnership has confirmed this. This position is being kept under review as the Local FRM Plans are developed.

Sustainability

- 3.6 Under the provisions of the Local Government in Scotland Act 2003 the Council has to discharge its duties in a way which contributes to the achievement of sustainable development. Under the Climate Change (Scotland) Act 2009 the Council also has a duty relating to climate change and, in exercising its functions must act:
- in the way best calculated to delivery of the Act's emissions reduction targets;
 - in the way best calculated to deliver any statutory adaptation programmes; and
 - in a way that it considers most sustainable.

3.7 Following an assessment using the Integrated Appraisal Toolkit, it has been determined that the proposal is likely to contribute positively to the following corporate sustainable development principles:

(i) Climate Change:-

- Efficient use of resources now and in the future in the built environment and service provision (e.g. energy efficiency, land, water resources, flood defence, waste minimisation) (Principle 2)
- Mitigation and adaptation to manage the impact of climate change and reduce the production of greenhouse gases (Principle 3)

Justification:

3.8 The selected actions will help to manage the increased flood risk brought about by climate change.

(ii) Community:-

- A sense of civic values, responsibility and pride (Principle 20)
- Creating a sense of place (e.g. a place with a positive 'feeling' for people, and local distinctiveness) (Principle 22)

Justification:

3.9 The proposed measures will help to make communities safer, through a reduction in flood risk. The draft Flood Risk Management (FRM) Strategies and Local FRM Plans have been subject to public consultation.

(iii) Equality & Diversity:-

3.10 Refer to Item 3.3 (above).

3.11 Following an assessment using the Integrated Appraisal Toolkit, it has been determined that the proposal is likely to contribute negatively to the following corporate sustainable development principles:

(i) Consumption & Production:-

- Efficient use of resources now and in the future in the built environment and service provision (e.g. energy efficiency, land, water resources, flood defence, waste minimisation) (Principle 2)
- Mitigation and adaptation to manage the impact of climate change & reduce the production of greenhouse gases (Principle 3)

Justification:

- 3.12 There may be a short term increase in consumption during the implementation of the selected actions, e.g. the construction of new flood defences, but a future reduction due to reduced flood risk.

Mitigation:

- 3.13 The efficient use of resources is to be considered on an individual project basis.
- 3.14 However, under the 2009 Act, the Council has a duty to manage flood risk in a sustainable way and to act in the best way calculated to contribute to the achievement of sustainable development. The measures that will be identified in the Council's future Local Flood Risk Management (FRM) Plans will comply with these requirements.

Legal and Governance

- 3.15 The Head of Legal Services and the Head of Democratic Services have been consulted on this report.
- 3.16 The legal basis for the proposals set out in this report is the Flood Risk Management (Scotland) Act 2009.

Risk

- 3.17 The risks associated with any actions to manage flooding will be identified and managed through individual projects.

4. Consultation

Internal

- 4.1 The Head of Legal Services, the Head of Democratic Services and the Head of Finance have been consulted in the preparation of this report.

External

- 4.2 The key outputs from the Flood Risk Management (FRM) process were recently subject to a phased public consultation between December 2014 and June 2015. This was a joint web based consultation using the Citizen Space platform. The Council has recently informed SEPA of any views expressed during the consultation that were considered to be relevant to SEPA's FRM Strategy.
- 4.3 The flood risk management actions proposed in this report have been developed through Local Plan District Partnerships by SEPA, Scottish Water and the relevant local authorities.

- 4.4 Consultation will be carried out with relevant external stakeholders on any individual proposals in future.

5. Communication

- 5.1 Communication with relevant external stakeholders will take place on any individual actions proposed to manage flood risk in the future.

2. BACKGROUND PAPERS

The following background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973 (and not containing confidential or exempt information) were relied on to a material extent in the preparation of the above report;

- PKC – Environment Committee – 27 January 2010, Flood Risk Management (Scotland) Act 2009 (Report No. 10/51)
- PKC – Environment Committee – 20 November 2013, Progress Report, Flood Risk Management (Scotland) Act 2009 (Report No. 13/544)
- PKC – Environment Committee – 12 November 2014, The Flood Risk Management (Scotland) Act 2009, Short List of Potential Measures to Manage Flood Risk (Report No. 14/483)
- PKC – Environment Committee – 21 January 2015, The Flood Risk Management (Scotland) Act 2009, Public Consultation Arrangements (Report No. 15/16)

3. APPENDICES

Appendix A - Detailed Description of Specific Actions

Appendix B - Brief Summary of Responses to Public Consultation

Detailed Description of Specific Actions

A more detailed description of the specific actions is provided below:-

- (i) Flood Protection Schemes or Works – Schemes and works include those actions where no further study is required to understand flood risk and measures have already been identified and developed. In order to reach this stage, detailed hydraulic modelling, optioneering and feasibility studies will have been completed. Local authorities are therefore likely to seek capital funding to deliver them during the first 6 year cycle of the Flood Risk Management (FRM) process.
- (ii) Flood Study – this applies where SEPA's appraisal has indicated that a group of actions are likely to address a flooding problem and that the initial assessment of technical, economic and environmental feasibility has indicated that it is worth progressing to a more detailed study. There are two types:-
 - Flood Protection Study – to consider engineered flood defences such as flood storage, improved conveyance, control structures and walls and embankments.
 - Natural Flood Management (NFM) Study – to consider using the natural features of the land (through techniques such as runoff control, river/floodplain restoration and sediment management) to store and slow down the flow of water.
- (iii) Surface water flooding will be managed separately from the Flood Risk Management (FRM) process in some areas through:-
 - Integrated Catchment Studies (ICS) – where it has been identified that there are interactions between the sewer network and other sources of flooding, then integrated hydraulic modelling of all sources will be carried out in certain areas.
 - Surface Water Management Plans (SWMP) – to identify measures to reduce surface water flood risk
- (iv) Flood Forecasting and Warning - There are already a number of flood warning schemes within Perth & Kinross on the River Tay, River Almond, River Earn, River Erich, River Isla and the Water of Ruchill at Comrie. SEPA are also considering potential new flood warning schemes within Perth and Kinross.
- (v) Improved Understanding – There are a number of locations where current national flood hazard mapping data does not represent flood risk adequately enough to generate meaningful strategic appraisal outputs, or shortlist potentially appropriate actions. Note that this is separate to those locations where a flood study is required to gain a more detailed understanding of local flooding mechanisms, inform optioneering and detailed design of Flood Risk Management (FRM) measures. This work has been prioritised under the flood protection studies category (see (ii) above).

Brief Summary of Responses to Public Consultation

No	Brief Summary of Comments Made
1	Consultee raised general concern over potential use of prime agricultural land as flood plain storage.
2	Consultee raised concern over characterisation of flood risk within LPD8 (Scone in particular) and PVA 08/11 (Scone); the land use planning objectives; surface water management objectives and actions; potential actions and draft delivery plan. The response raised various local issues regarding flooding on the Annaty Burn and the barrel drain in Scone.
3	Consultee raised concern over characterisation of flood risk in PVA 08/07 (Coupar Angus) and elsewhere in Meigle. The response noted a preference for sediment management and modification of conveyance which should be carried out by Council and landowners.
4	Consultee raised concern over the characterisation of flood risk on the River Garry in PVA 08/01 (Blair Atholl).

