

Developing with Nature guidance

Guidance on securing positive effects for biodiversity from local development to support draft NPF4 policy 3(e)

Overview

General Comments

Scottish Water generally encourages any measures put in place to protect and enhance biodiversity. The guidance provides an excellent level of detail in each section; however, the guidance does not quantify the requirement for each measure, despite the hard numbers of species decline laid out within the introductory section.

New developments provide opportunity to introduce nature-based solutions, where appropriate, and we particularly welcome the integration of design features such as Sustainable Urban Drainage Systems (SuDS) ponds, swales and rain gardens that complement the services provided by Scottish Water. Measures are focused on urban developments and Scottish Water would like to see the integration of these design principles across all areas, depending on habitat suitability. We also feel there would be additional benefit in the inclusion of householders within the guidance (e.g., for large extensions and outside work away from the domestic structure), as these developments can significantly benefit from nature-based solutions such as rain gardens and living roofs. Doing so would align with our surface water policy, which aims to discourage additional new surface water connections resulting from urban creep.

Scottish Water would welcome the opportunity to contribute to any further guidance as it emerges, in order to consider the impact and application of specific measures in more detail.

Detailed Response

Specific Comments

The guidance emulates sustainable land management practices and Scottish Water welcome enhancement of the measures detailed. The complimentary guidance on maintenance requirements for each of the measures provided is a useful supplement that will support optioneering at the project design stage.

Previous surveys of designers and practitioners have highlighted that the abundance of information on the topic of nature-based solutions can cause confusion and therefore a lack of consistency in application. The addition of another guidance document covering much of the same information may compound this issue and lead to a lack of consistency in application. A literature review summarising existing documentation would provide a useful supplementary reference piece and ensure consistency across all guidance documents. A high-level reference document summarising existing industry best practice would also be of benefit.

1	The list of measures and features identified in the guidance - are these the appropriate ones, and are there any others that should be included?
Suggested additional guidance related to construction materials. The addition of guidance related to internal and external natural building materials that promote biodiversity could also be included for consideration e.g., insulation, pathways etc.	
2	The level of detail provided on each of the individual measures and features – is there adequate information set out to inform understanding of the range of biodiversity measures that can be incorporated in a development?
<p>Please place you answer under the appropriate heading.</p> <p>MEASURES Planting for Nature –</p> <p>1. PLANTS FOR POLLINATORS The detail provided is adequate. No further comment.</p> <p>2. WILDFLOWER MEADOW The detail provided is adequate. No further comment.</p> <p>3. NEW AND OLD GROWTH ORCHARDS The detail provided is adequate. No further comment.</p> <p>4. TREES, SCRUB AND WOODLAND A lot of the content of the guidance seems centred around urban areas, but Scottish Water welcome planting of the appropriate tree in all places that can benefit source water quality without impacting too greatly on yield.</p> <p>5. LIVING ROOFS - GREEN, BROWN, AND BLUE The detail provided is adequate, however we would welcome an additional statement within this section to clarify the relationship between roof gradient and capacity to successfully establish a living roof.</p> <p>6. GREEN WALL AND GREEN SCREEN The detail provided is adequate. No further comment.</p> <p>7. BOUNDARY HEDGE The detail provided is adequate. No further comment.</p> <p>Providing Homes for Nature –</p> <p>8. LOG AND LEAF PILES The detail provided is adequate. No further comment.</p> <p>9. HIBERNACULA The detail provided is adequate. No further comment.</p> <p>10. HOMES FOR BEES The detail provided is adequate. No further comment.</p>	

11. HOMES FOR BUGS

The detail provided is adequate. No further comment.

12. HOMES FOR HEDGEHOGS

The detail provided is adequate. No further comment.

13. HOMES FOR SMALL BIRDS

The detail provided is adequate. No further comment.

14. HOMES FOR OWLS

The detail provided is adequate. No further comment.

15. HOMES FOR BATS

The detail provided is adequate. No further comment.

16. WILDLIFE WALL

The detail provided is adequate. No further comment.

17. WILDLIFE TOWER

The detail provided is adequate. No further comment.

18. WILDLIFE FRIENDLY LIGHTING

The detail provided is adequate. No further comment.

Managing Water with Nature –

19. RAIN GARDEN

We welcome the addition of rain gardens in appropriate developments, to prevent flooding and excessive run off. This is of great benefit to Scottish Water's business.

20. WILDLIFE SWALE AND DITCH

We welcome the management of swale and ditches to control run off and separate dirty and clean water sources.

21. BIODIVERSE SUSTAINABLE DRAINAGE SYSTEM PONDS

Core documentation is already in circulation (e.g., Ciria SuDS manual) that covers much of what is covered within the SuDS section of the NatureScot guidance. We welcome SUDS options in all relevant developments to manage run off. This is of great benefit to Scottish Water's operations and activities.

22. PONDS FOR WILDLIFE

We consider that ponds can have a benefit for wildlife and the management of water and welcome their inclusion in the guidance.

23. DRAIN ESCAPES

We welcome the addition of measures that would reduce wildlife entrainment in drains, provided devices are designed to an appropriate specification and suitably located and fitted.

3	The clarity and accessibility of the guidance as a means of a) informing project design, and b) decision making on the measures to be included in individual applications?
<p>The tables provided within Section 3 provide a means of determining the most applicable measures to improve biodiversity, relative to the scale and scope of the development. Where appropriate, it would be useful to add and quantify additional complimentary factors such as habitat connectivity, priority habitats and ecosystem services, to support design optioneering.</p>	

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