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If telephoning ask for:
Simon Watt

13 October 2016

By email only to: planning@lochlomond-trossachs.org.uk

Dear Madam

**Pre-planning enquiry
Erection of office accommodation
Sawmill Balliemanoach, Strachur, Argyll and Bute PA27 8DW**

Thank you for your consultation email which SEPA received on 06 October 2016.

We welcome pre-application engagement, but please note that our advice at this stage is based on emerging proposals and we cannot rule out potential further information requests as the project develops.

In summary, to satisfy us that the development is consistent with the requirements of Scottish Planning Policy (SPP), we recommend that the issues set out within Section 1 below are addressed to avoid unnecessary delay and/or objection from SEPA.

1. Flood Risk

1.1 We have concerns that, on the basis of the information supplied, the development may place buildings and persons at flood risk contrary to SPP. We would wish to receive clarification on the following point to prevent us from lodging an objection to the proposed development:

- Given there appear to be lower risk locations outwith the functional floodplain, we require the development to be modified such that development is proposed in these areas. There may still be the need for adequate flood mitigation measures, which may include compensatory storage. We are not supportive of under building as a flood mitigation measure in this instance.

1.2 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.



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- 1.3 Furthermore we are aware of instances of flooding in the area, including in the last 15 years, which we consider additional information supporting our concerns that the site is at a risk of flooding.
- 1.4 Scottish Planning Policy (SPP) (paragraph 255) states that "the planning system should promote... flood avoidance by safeguarding flood storage and conveyance capacity and locating development away from functional floodplains and medium to high risk areas". Built development should not therefore take place on the functional flood plain.
- 1.5 We have previously commented on proposals at this site, raised flooding concerns and requested further information to assess the flood risk. We have now been asked to provide pre-planning comments based on a response letter from Terrenus Land and Water (dated 20 June 2016), which we did not receive as part of the previous planning application consultation, and can make the following comments.
- 1.6 Previously we had concerns with the proposals which included constructing a new office building fully within the floodplain of the River Cur. The flood extent was calculated based on 1D hydraulic modelling of the watercourse in MIKE 11 software, which we agreed was appropriate for such a study. The flood extent showed a significant portion of the site as being within the functional (1 in 200 year) floodplain, however did identify a part of the site as being outwith the functional floodplain (albeit within the 1 in 200 year plus climate change extent).
- 1.7 The previous application stated "*there is no other ground available within the site that is suitable for the proposed development*". This was on the basis of various factors, such as minimising pedestrian and traffic interactions, that the location had the best overview of the site and had the best amenity and aesthetics, and the development would occupy "*dead ground*" in the site of limited commercial use to existing operations. While we acknowledged the reasons provided, we did not consider aesthetic or limited commercial use to be valid reasons to locate development within the floodplain. We maintained the most sustainable form of flood risk management at the site would be to locate the proposed development outwith the functional floodplain. This is in line with the avoidance principle of SPP, which we would be supportive of. At this pre-planning stage, we reiterate our former position, and would seek development to be located at an alternative, lower risk location.
- 1.8 Notwithstanding this, the information we have been provided indicates the building is still proposed to be located within the functional floodplain of the River Cur. In order to mitigate against the flood risk, it is intended to alter the office development such that the under floor building would be allowed/designed to inundate. This would be achieved by the use of a suspended floor slab and both high level and low level air venting. It is stated in the letter that this approach has been previously approved for use in Scotland by SEPA and the local planning authority. It is our understanding that such proposals were deemed acceptable a number of years ago for the redevelopment of an existing building. In this instance, given the office building is entirely new, we would not be supportive of such an approach, particularly given there appear to be lower risk locations (from a flood risk perspective) available within the site.
- 1.9 The site in question has a risk of flooding and it follows that to allow development to proceed may place property or persons at serious risk contrary to SPP.
- 1.10 Please note we given our concerns with the current proposed building location we have not commented on the appropriateness of the proposed access arrangement. We can also advise, for information, that the velocity information submitted satisfies our technical requirements.

Disclaimer

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

Caveats & Additional Information for Applicant

- 1.11 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 cross-sections 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/environment/water/flooding/flood-maps/>.
- 1.12 We refer the applicant to the document entitled: "Technical Flood Risk Guidance for Stakeholders". This document provides generic requirements for undertaking Flood Risk Assessments and can be downloaded from <http://www.sepa.org.uk/media/162602/ss-nfr-p-002-technical-flood-risk-guidance-for-stakeholders.pdf>. Please note that this document should be read in conjunction Policy 41 (Part 2).
- 1.13 Our Flood Risk Assessment checklist should be completed and attached within the front cover of any flood risk assessments issued in support of a development proposal which may be at risk of flooding. The document will take only a few minutes to complete and will assist our review process. It can be downloaded from <http://www.sepa.org.uk/media/159170/flood-risk-assessment-checklist.xls>.
- 1.14 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.

2. Regulatory advice for the applicant

- 2.1 Details of regulatory requirements and good practice advice for the applicant can be found on the [Regulations section](#) of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the regulatory team in your local SEPA office at:

Kilbrandon House
Manse Brae
Lochgilphead
PA31 8QX

Tel: 01546 602 876

If you have any queries relating to this letter, please contact me by telephone on 01698 839 000 or e-mail at planning.sw@sepa.org.uk.

Yours faithfully

Simon Watt
Senior Planning Officer
Planning Service