

2 Myreton Cottages,
Insch,
Aberdeenshire,
AB52 6LS

For the attention of Mr. Simon Watt,
By e-mail only

Date: 30th August 2017

Dear Simon,

**TOWN AND COUNTRY PLANNING (SCOTLAND) ACTS - PLANNING APPLICATION:
2017/0062/DET - ERECTION OF NEW OFFICE PREMISES AT SAWMILL
BALLIEMEANOCH, STRACHUR, ARGYLL AND BUTE, PA27 8DW**

Following receipt of the SEPA response, dated 16th March 2017, with respect to the above project we are pleased to provide the following comments and additional information.

All points raised within Section 1 will be addressed following, in the same order and reference as presented in the SEPA response letter (PCS/151890).

Section 1 Flood Risk

Item 1.1:

“In summary we wish to receive clarification on the following points before we would consider removing our objection to the proposed development:

- *Modification of the development to locate the proposed building outwith the functional floodplain in line with Scottish Planning Policy. There may still be the need for adequate flood mitigation measures, which may include compensatory storage.*
- *Further information on the access and egress arrangements.”*

The modification of the development is not considered necessary or appropriate as the risks to property and persons have been addressed, understood and mitigated against as part of the flood risk assessment process. The proposed location of the lower risk commercial office block currently provides betterment to the flood risks posed to staff by the current layout on site and affords a much more accessible position for safe access and egress. In addition, the operation, logistics and health and safety risks associated with the site are greater than those posed by flooding and favour the current location over others. Terrenus acknowledge that there is land outwith the functional flood plain within the planning application site boundary, but also notes that there are no certainties associated with this location. Particularly as there are likely to be greater risks with respect to access and egress.

Item 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. As noted in the cover letter, the site has experienced flooding, including in the last 15 years, which we consider additional information supporting our concerns that the site is at a risk of flooding.”

We acknowledge that the site is at a risk of flooding and have demonstrated by means of detailed hydraulic modelling the extent and nature of the flooding for the design storm event and taken into consideration future allowances for global climatic change. SEPA have previously requested and been supplied with additional information concerning the site and have accepted our model for the River Cur and the associated flooding at the site. The extent and nature of the flooding at the site is a known and quantifiable risk.

Item 1.3:

“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.”

Noted and agreed, however, the proposed development does not reduce the storage volume within the functional flood plain or significantly alter the conveyance of flood waters across the site. The proposed development has been designed to maintain, as far as is practicably possible, the natural function the flood plain within the site for the design storm event.

Item 1.4:

“We have previously commented on proposals at this site under planning application 2015/0305/DET, raised flooding concerns and requested further information to assess the flood risk. We also offered pre-planning advice (letter dated 13 October 2016 under PCS/149362) on a letter from Terrenus Land and Water (dated June 2016) which outlined flood mitigation measures and the provision of emergency access and egress.”

Emergency dry pedestrian access and egress is maintained at all times via a raised pedestrian walkway from the proposed office building to the A815 road embankment. The road embankment is significantly higher than the ground levels within the site. The overland flood routing through the site and across the A815 in the southwest of the site

Item 1.5:

“The location of the proposed office building has not been modified as part of this submission. The flood extents determined by the Terrenus Flood Risk Assessment (FRA) show a significant portion of the site as being within the functional (1 in 200 year) floodplain. However, they also do identify a part of the site as being outwith the functional floodplain (albeit within the 1 in 200 year plus climate change extent). The development is still proposed to be located within the functional floodplain of the River Cur.”

As noted under Item 1.1 above, the proposed development location remains the most suitable location within the site for the type and function of the building. The proposed location provides a betterment to the existing flood risk conditions faced by staff at the site. The risks posed by flooding are known, understood and quantifiable and the resultant design reflects the known risks and manages them with sound engineering and development appropriate mitigation measures.

Item 1.6:

“The previous application stated that “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 acknowledge the reasons provided, we do not consider aesthetic or limited commercial use to be valid reasons to locate development within the floodplain. 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. Our previous position remains and we require that the development be located at an alternative, lower risk location.”

Relocation of the development to the area required by SEPA would reduce the access and egress options available to staff working at the site and put them at a greater risk of flooding. The relocation would potentially cut off the proposed office block from the A815 and lead to dry pedestrian access and egress routes via rough uneven agricultural ground to the east or via local access tracks. In addition the proposed location offers enhanced day to day health and safety working practises at the site. The current proposed location is the best fit location within the site.

Item 1.7:

“At pre application stage it was indicated that it was proposed 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. Whilst this does not appear to form part of the latest planning application we would reiterate, as stated at pre application stage, that given the office building is entirely new, we would not be supportive of such proposals, particularly given there appear to be lower risk locations (from a flood risk perspective) available within the site. Should the proposal result in a loss of storage from the functional flood plain, we expect compensatory storage to be provided and it demonstrated that there is a neutral or beneficial impact on flood risk. No alternative compensatory storage details have been provided.”

The proposed office development will incorporate under floor inundation as per previous applications. This approach has previously been accepted elsewhere by SEPA for brownfield re-development. No compensatory storage is required under the proposed development.

Item 1.8:

“We understand that the raised pedestrian walkway is to the A815 and is noted as outwith the functional flood plain (Terrenus Letter dated 20 June 2016). However given that the flood extents within the FRA show an overland flow route onto the road at the south west corner of the site we would have concerns that the road may be inundated via the flow path through the site. We therefore require further information to clarify that safe access and egress is available from the site. The flood early warning system is not mitigation against flooding of the site itself.”

Emergency dry pedestrian access and egress is maintained at all times via a raised pedestrian walkway from the proposed office building to the A815 road embankment. The road embankment is significantly higher than the ground levels within the site. The overland flood routing through the site and across the A815 in the southwest of the site will prevent dry pedestrian emergency access and egress to the south. However, access is available at all times to the north towards the higher ground and the village of Strachur, which lies within 1km of the site.

The original Flood Risk Assessment conducted by Terrenus Land & Water Ltd, dated 17th December 2015 stated the following:

“In order to provide safe emergency access and egress from the site, it is recommended that the site access road be re-profiled to a minimum level of 37.5m OD throughout the site and 37.2m OD at the site entrance off the A815. This would ensure that the flood water depth does not exceed 300mm across the access point. To assist in the conveyance of the flood water through the site and maintain the existing flood routing pathways, a swale should be incorporated to convey flood waters to the west and across the A815 from the lower lying site access at the south-western corner of the site.”

The above mitigation measures would ensure emergency vehicular access to the site and across the A815. This general improvement would benefit both the site and the local road network by improving on the overland flow pathway across the A815, which is a major road in the area. The improvement would also improve emergency vehicular access to the village of Strachur.

Item 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.”

The proposed mitigation measures have been designed and recommended to reduce the risk of both properties and persons at the site. The risks from flooding at the site are known, understood and quantifiable, which allows the appropriate mitigation measures to be implemented. Providing site users with adequate protection and a betterment to the local populace through better flood warning and emergency access.

Item 1.10:

"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 Loch Lomond & The Trossachs National Park 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 in line with the phases of this legislation and can be downloaded from <http://www.sepa.org.uk/environment/land/planning/guidance-and-advice-notes/>."

Noted, no further comment required.

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I trust that the above is in order, however, should you any queries regarding the above, or wish to discuss any other matters arising, then please do not hesitate to contact me.

Yours faithfully,



Douglas Aitken
Associate Director
Terrenus Land & Water Ltd

CC Mr Jack Thomson