

16 December 2011

Strictly Private & Confidential

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Dear Charles

National Grid Planning Application, Argyll Street, Dunoon

I refer to the recent submissions and correspondence between Dougall Baillie Associates, Argyll & Bute Council Flood Officer and SEPA with regard to the above application.

If at all possible, I would request that this letter by email is provided to the Planning Committee in advance of next Wednesdays PPSL Committee at which the above application will be determined.

As a farmer's son who was raised in the countryside I was taught from a very early age that "common sense" is the most useful tool any one can have in their armoury.

I am at a complete loss as to why our flood risk specialist, who are experts in their field, and who advise many Scottish Council's have a completely different opinion than that of Argyll & Bute Councils Flood Officer as well as SEPA.

In an attempt to apply "common sense" I would like to set aside the technical aspects of the flood risk assessment for a moment and would make the following comments based on a common sense approach.

1. SEPA confirm that "level for level storage is not feasible" with the National Grid compensatory storage scheme. This in my simple view would mean that third party land surrounding the site is going to be affected in some shape or form.

Given that this contravenes SEPA's own advice note and Scottish Planning Policy why would anyone recommend that this is acceptable?

2. I note that within condition 14 that compensatory storage requires to be provided for up to the 200 year plus 50% culvert blockage scenario flood extent. It is somewhat strange, again from a layman's perspective, that within the Dougall Baillie Associates report they only provide information on storage volumes up to the 200 year plus 20% scenario as their elevation/storage curve does not extend to the peak flood level. Again, simply put, how can anyone make a recommendation on whether it is acceptable given that the information has not been provided.

It seems to me that when you look at all of the information provided we have two differences of opinion as to what is acceptable and what is not. I would like to draw your attention to an email sent by Dr Yusuf Kaya to SEPA which raises serious concerns about SEPA's approach and advice and the consistency of this advice. As you will see from this email SEPA are taking different "stand points" in different areas and their advice is not consistent.

If Scottish Planning Policy dictates that no third party land should be affected by new development proposals and Dougall Baillie Associates, the flood risk officer and SEPA accept that "level for level storage is not feasible" on their land then surely "common sense" must prevail and the scheme should be rejected.

As part of this letter, I have not expanded on the concerns raised with regard to car parking numbers as this has already been dealt with by my planning consultant, however, I would like to reiterate our position that not only does the scheme fall below the standards set by Argyll & Bute Council but it also falls below the requirements of all main food store operators.

Yours sincerely

Bruce C Weir