

Our ref: PCS/117213  
Your ref: 10/03061/DC

If telephoning ask for:  
Nicki Dunn

12 December 2011

[REDACTED]  
Glasgow City Council  
Development & Regeneration Services  
229 George Street  
Glasgow  
G1 1QU

By email only to: [REDACTED]

Dear Sir

**Town and Country Planning (Scotland) Acts**  
**Planning Application:** [REDACTED]  
**Erection of residential development and associated landscaping**  
**Site at** [REDACTED] **Glasgow**

Thank you for your consultation which SEPA received on 18 November 2011. We **maintain our objection** to the proposed development on the grounds of flood risk. Our letter of 1 April 2011 contains information and comments that are still pertinent to this application.

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, which may take into account factors not considered at the planning stage.

**Advice for the planning authority**

**1. Flood Risk**

- 1.1 We maintain our objection to this proposed development on the grounds that it may place buildings and persons at flood risk contrary to Scottish Planning Policy (SPP) and PAN 69.
- 1.2 In summary we wish to receive clarification on the following points before we would consider removing our objection to the proposed development:
  - We require confirmation that compensatory storage proposed will provide like-for-like storage up to and including the 1:200 year flood. Furthermore any proposal must demonstrate that it has a neutral or better impact on the risk of flooding to adjacent sites and is consistent with SEPA's Technical Flood Risk Guidance for Stakeholders and SPP.
  - Should Glasgow City Council consider the bank side section of this site to be Greenfield we will maintain our objection to this proposal and recommend that Blocks C and D are relocated entirely out with the functional flood plain.
- 1.3 In the event that the planning authority proposes to grant planning permission contrary to this advice on flood risk the application must be notified to the Scottish Ministers as per The Town and Country Planning (Notification of Applications) (Scotland) Direction 2009.



Chairman  
David Sigsworth  
  
Chief Executive  
Dr Campbell Gemmell

East Kilbride Office  
Redwood Crescent, Peel Park, East Kilbride G74 5PP  
tel 01355 574200 fax 01355 574688  
[www.sepa.org.uk](http://www.sepa.org.uk)

- 1.4 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 Glasgow City Council 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 inline with the phases of this legislation and can be downloaded from [www.sepa.org.uk/flooding/flood\\_risk/planning\\_flooding.aspx](http://www.sepa.org.uk/flooding/flood_risk/planning_flooding.aspx).

## **2. Surface Water Drainage**

- 2.1 In our letter of 1 April 2011 we requested a condition be imposed requiring submission of an amended SUDs plan, this requirement still stands.

### **Detailed advice for the applicant**

## **3. Flood Risk**

- 3.1 We have previously provided comments on this development and technically reviewed the Flood Risk Assessment (FRA) provided in support of the proposal which was in summary thought to be a robust assessment.
- 3.2 SEPA guidance is clear in requiring that compensatory storage provide like-for-like storage up to and including the 1:200 year flood; this is expressly acknowledged by Kaya on page 2 of their letter.
- 3.3 In Figure 3 (page 5) Blocks C and D are shown to both start at a lower elevation than the compensatory storage and therefore under a range of medium/high flow conditions the proposed development may reduce the storage capacity of the River Kelvin. This will have a detrimental impact of the probability of flooding elsewhere and is therefore contrary to SPP (paragraph 208). It is noted that hydraulic modelling has been re-run suggesting no significant effect on flood levels but it is recommended that this analysis is provided for review in tabular format (showing existing against proposed flood levels) and lower design flows are also provided to ensure a neutral effect on flood risk.
- 3.4 We would also raise some concern about the use of a retaining wall and recommend that any finished floor levels should be above the crest level of this wall to reduce any residual flood risk in the event of overtopping or failure.
- 3.5 Whilst the site is described as being Brownfield is not clear if this description applies to the bank side section of the site where land raising is being proposed. We will object to land raising within an un-developed/sparsely developed floodplain (i.e. any Greenfield location). We will seek clarification from Glasgow City Council Planning Department as to whether or not they consider this section of site to Greenfield. As such to try and help progress matters it is recommended that the development is revised to avoid any floodplain development.
- 3.6 The Indicative River & Coastal Flood Map (Scotland) has been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km<sup>2</sup> using a Digital Terrain Model (DTM) to define river cross-sections and low-lying coastal land. The outlines do not account for flooding arising from sources such as surface water runoff, surcharged culverts or drainage systems. The methodology was not designed to quantify the impacts of factors such as flood alleviation measures, buildings and transport infrastructure on flood conveyance & storage. The Indicative River & Coastal Flood Map (Scotland) is designed to be used as a national strategic assessment of flood risk to support planning policy in Scotland. For further information please visit [www.sepa.org.uk/flooding/flood\\_map.aspx](http://www.sepa.org.uk/flooding/flood_map.aspx).

- 3.7 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 [www.sepa.org.uk/flooding/flood\\_risk/planning\\_flooding.aspx](http://www.sepa.org.uk/flooding/flood_risk/planning_flooding.aspx). Please note that this document should be read in conjunction with Annex B in SEPA Policy 41: "*Development at Risk of Flooding, Advice and Consultation – a SEPA Planning Authority Protocol*", available from [www.sepa.org.uk/flooding/flood\\_risk.aspx](http://www.sepa.org.uk/flooding/flood_risk.aspx).
- 3.8 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 [www.sepa.org.uk/flooding/flood\\_risk/planning\\_flooding/fra\\_checklist.aspx](http://www.sepa.org.uk/flooding/flood_risk/planning_flooding/fra_checklist.aspx).
- 3.9 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.

#### **4. Surface Water Drainage**

- 4.1 The applicant should note that SUDs are required for the construction phase of the development as well as post development.
- 4.2 In our letter of 1 April 2011 we recommended that the applicant contact our local operations team to discuss the specific requirements of the SUD scheme and any related engineering works.

#### **Regulatory advice**

#### **5. Regulatory requirements**

- 5.1 Details of regulatory requirements and good practice advice for the applicant can be found on our website at [www.sepa.org.uk/planning.aspx](http://www.sepa.org.uk/planning.aspx). If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the operations team in your local SEPA office at:

##### **Glasgow office**

Law House  
Todd Campus  
West of Scotland Science Park  
Maryhill Road  
GLASGOW  
G20 0XA  
Tel: 0141 945 6350

If you have any queries relating to this letter, please contact me by telephone on 01355 574200 or e-mail at [planning.ek@sepa.org.uk](mailto:planning.ek@sepa.org.uk).

Yours faithfully

Nicki Dunn  
Planning Officer  
Planning Service

Email to: [REDACTED]

Copy to: [REDACTED]