

From: [REDACTED]
Sent: 23 July 2023 20:16
To: planningemail - Loch Lomond <planning@lochlomond-trossachs.org>

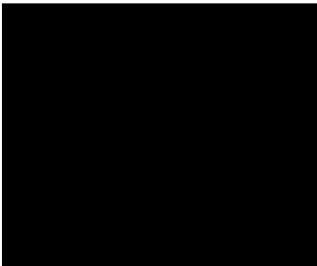
[REDACTED]
Subject: 2022/0157/PPP Flood Risk Assessment

2022/0157/PPP RESPONSE TO FLOOD RISK ASSESSMENT

Woodbank House/Old Luss Road Area

Please accept the attached OBJECTION for the planning due process and consideration.

Regards



On the 30th June 2023 several documents were submitted by Lomondbanks relating to a Flood Assessment for planning application 2022/0157/PPP.

Scrutiny of these documents have shown the following, and all relate to **EIA Report-Vol2-Appendix 10.2-Flood Risk Assessment (Reference A)**:-. However, the conclusions are as follows:

Conclusions of the documents below

It is apparent that the only consideration in the Flood Risk Assessment is about the Woodbank development site and there is no evaluation or concern about the impact the development will have on flood risk to the surrounding properties.

It is also apparent that the flooding risk to the surrounding properties depends largely on a maintenance regime to keep the culverts clear. A satisfactory maintenance regime is not in place even though several mitigations have been identified to West Dunbartonshire Council, SEPA and LomondBanks as required.

In accordance with the illustrative Masterplan for Lomondbanks dated 06/01/2023 there are 136 car parking spaces. Therefore, the statement from Lomond Banks that "Access to the majority of these lodges will be by foot with only emergency vehicle access where required" is incorrect. It is estimated that 40% of the free draining land will be hardstanding (car parking, roads and lodge foundations), therefore causing a greater flood risk to the adjacent and Old Luss Road properties.

There have been numerous incidents of sewage discharge, 2 which have been documented and reported to Scottish Water. It is apparent these have not been considered by LomondBanks.

Flooding of Old Luss Road Has been a constant problem at least since 1981. However, West Dunbartonshire Council have failed to rectify the problem. It is also not apparent whether they have reported the problem to SEPA or LomondBanks for consideration in the planning application. There is no assessment of the impact the development will have on this.

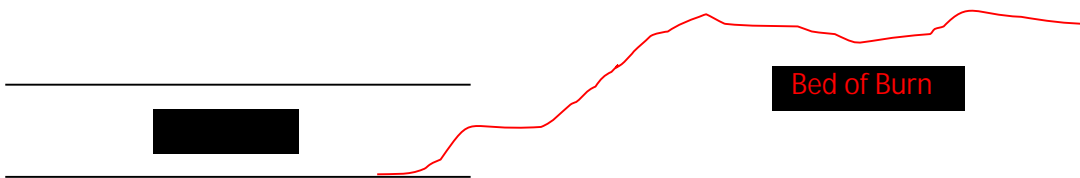
Throughout the documents below it is apparent that the only considerations by Lomondbanks is to protect their site from flooding to the detriment of the local area.

IT IS CLEAR THAT THERE IS A FLOODING RISK TO THE DEVELOPMENT AND PROPERTIES. THEREFORE, THERE SHOULD BE NO DEVELOPMENT UNTIL ALL THE FLOOD ISSUES ARE ADDRESSED.

IT SHOULD ALSO BE RECOGNISED THAT IF THE WOODBANK DEVELOPMENT CAUSES AN INCREASED FLOOD RISK TO THE SURROUNDING PROPERTIES, THEN INSURANCE IS REQUIRED BY LOMONDBANKS TO COVER ANY CLAIM THAT SHOULD ARISE FROM THOSE PROPERTIES.

Part 3 of 3 of Ref A

This document shows several views/photos of the unnamed watercourse 2 which flows via culverts under Old Luss Road. What the views/photos do not show is the difference in levels between the bed of the unnamed watercourse and the bottom of the culverts as shown below, which is causing a dam affect and a serious flood risk to the properties in Old Luss Road and Lower Stoneyrollan Road



As can be seen from the above the silt/rocks/debris being washed down the watercourse have nowhere to go and the culvert slowly becomes blocked as is shown in the following photograph.



This photograph and a flood risk assessment has been discussed in Riverside West: Flood Risk Clarifications – Briefing Note 2, contained in Part 2 of 3 of Ref. A

Briefing Note 2, contained in Part 2 of 3 of Ref. A states the following :-

1. *no fluvial floodwater is expected to spread further onto the site until the 16mAOD level is breached. However, before this breach could occur parts of the right bank and the road level will have already been topped. Therefore, a larger amount of the overtopping floodwater would flow in the northeasterly direction over the road and through the residential gardens.*
2. *it is not considered that flooding would extend far onto the site and so only a small corner of the development area may potentially be affected. As noted above, if a reasonable maintenance regime of culverts is implemented, it is unlikely there would be any flooding to the site. To account for the uncertainty in implementing such a maintenance regime by allowing a sufficient buffer of at least 5m wide will ensure that no part of the proposed development will be at medium – high likelihood of flood risk.*

Notes:

1. From the above it is apparent that the only consideration is that the Woodbank development site will not be subject to a flood risk at the expense of the surrounding properties.
2. It is also apparent that the flooding risk to the surrounding properties depends largely on a maintenance regime to keep the culverts clear. A satisfactory maintenance regime is not in place even though several mitigations have been identified to West Dunbartonshire Council, SEPA and LomondBanks as required. These are :-
 - Excavate the bed of Unnamed Watercourse 2 to the level of the bottom of the burn
 - Keep the culverts clear
 - Repair the trash grill upstream of the Lower Stoneymollen Road culverts
 - Excavate and keep clear the sediment tanks upstream of the above trash grill
 - Keep the drainage ditch down Lower Stoneymollen Road clear
3. Old Luss Road is also subject to flooding due to a defective gully drain system which has been apparent for at least the last 40 years but has not been addressed or rectified.

IT SHOULD BE NOTED ALL OF 2. ABOVE CONTRIBUTE TO CULVERT BLOCKAGE BUT NONE OF THE DEFECTS HAVE BEEN RECTIFIED despite a reply from SEPA under PCS/159867 dated 26 July 2018 stating :-

1.6 We do however recognise that based on the photographic information you have provided significant culvert blockage is prevalent at the site and to address this issue we would be in agreement **that culvert clearance should be undertaken along with regular inspection and maintenance.** We will also be requesting confirmation on who will be responsible for the ongoing inspection and maintenance of culverts and watercourses. It is our assumption that at this time West Dunbartonshire Council Roads Dept (WDC) will be the statutory body responsible for these works.

Part 1 of 3 of Ref A

2.1.6 In the Woodbank area of the site 67 lodges are proposed in both the grazing land and in the woodland. **Access to the majority of these lodges will be by foot with only emergency vehicle access where required.** Woodbank house is to be fully refurbished to contain 15 flats as well as 6 self catering properties in within the ancillary buildings.

Note:

In accordance with the illustrative Masterplan for Lomondbanks dated 06/01/2023 there are 136 car parking spaces. Therefore, the above statement from Lomond Banks is incorrect. It is estimated that 40% of the free draining land will be hardstanding (car parking, roads and lodge foundations), therefore causing a greater flood risk to the adjacent and Old Luss Road properties.

4.2.21 Should all culverts However, from information received during the previous study it was determined that the downstream triple pipe arrangement was significantly blocked with silt and debris and so flows would be restricted.

4.2.22 In order to determine the potential flow routes should culvert maintenance be neglected and the blockages remain, an assessment of ground levels was undertaken. This established that at the downstream culvert where it passes below Old Luss Road, the right bank is lower than the left bank by approximately 300mm, **and so overtopping would route into the gardens of the adjacent property and on to the road prior to it overtopping the left banks and into the site.**

4.2.23 Regardless of this flow path, it was still recommended that a buffer of 5m be maintained from the edge of the watercourse **to ensure that no part of the proposed development will be at medium – high likelihood of flood risk.**

Note:

From the 2 paras. above it would appear Lomondbanks have no mitigations to protect the area or properties outside the development site.

Sewer Flooding

4.3.8 No records of flooding from sewers have been received from consultation undertaken for this assessment.

Note: 1 – The above statement is incorrect. There have been numerous incidents of sewage discharge, 2 which have been documented and reported to Scottish Water.

Fig1 shows a popping sewer lid which was a contributory reason for the flooding of Old Luss Road shown in Figure 2

Figure 3 shows the aftermath of a sewage discharge into the gardens of properties in Old Luss Road. A subsequent investigation by Scottish Water found the local sewage system in a state of partial disrepair with ingress of tree roots into clay pipes causing blockage.



Figure 1



Figure 2



Figure 3

Pluvial flooding

4.3.16 The lowest ground levels in the Woodbank House area of the site is located adjacent to Old Luss Road, on the southern side of the stone wall which bounds the site. Any surface runoff from the woodland or fields up slope of this would route to and accumulate at this location.

4.3.17 It is recommended that no buildings be located within this low spot within the site, and a buffer be maintained along the boundary with Old Luss Road **where the existing stone wall presents a barrier to any overland flows.**

Note:

1. This statement is untrue. The existing stone wall has pressure relieving holes, which allow any accumulation of flood water in the low spot to spill onto Old Luss Road and exacerbate the flooding of Old Luss Road.
2. Flooding of Old Luss Road Has been a constant problem at least since 1981. However, West Dunbartonshire Council have failed to rectify the problem. It is also not apparent whether they have reported the problem to SEPA or LomondBanks for consideration in the planning application.

4.3.34 The unnamed watercourse 1..... Should flows back up from this culvert, they would inundate the area surrounding the culvert inlet until they overtopped onto the road above. A stone wall is located above the right bank, along the northern boundary of the Woodbank site, which **would prevent flows from routing into the development site,** and would direct flows onto Old Luss Road. **Once on the road they would route in a south-easterly direction with the fall in the road, however they would not route into the site due to the stone wall continuing around its boundary.**

Note: Once again this highlights that Lomondbanks only consideration is to protect their site to the detriment of the local area. Flood water will flow down Old Luss Road and exacerbate the flooding of Old Luss Road as shown in Fig2 above.

Part 2 of 3 – Flood Risk

Flood Risk Assessment at Site E Woodbank Site from the Unnamed Watercourse 2 (UW2) dated 10 Dec 2018 (Fig5 below) shows overtopping of Unnamed Watercourse 2 flowing into residential properties.

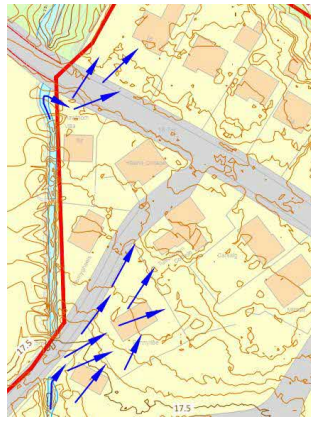


Figure 5

Note: This is consistent with the SEPA flood map in Fig6 below which highlights a 10% risk of flooding for properties in Old Luss Road and Lower Stoneymollen Road.

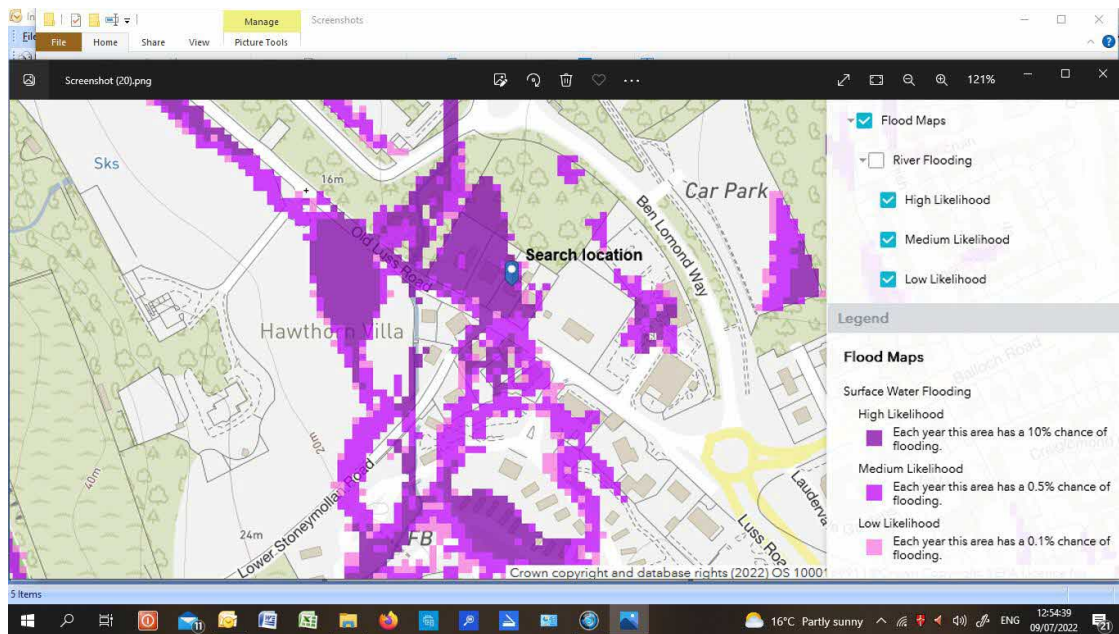


Figure 6 SEPA Flood Map

Recommendation

DO NOT ALLOW THE WOODBANK DEVELOPMENT TO PROCEED WITHOUT RECTIFICATION OF THE LONG STANDING FLOOD PROBLEM, ALL OF WHICH ARE RECTIFIABLE.