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Ms Fiona Walling
Scottish Borders Council
Headquarters
Newtown St Boswells
TD6 0SA

26th June 2020

Dear Ms Walling
Re : Ref 20/00005/RREF – Land to The South West of 3 Mill Lade, Blyth Bridge.

Thank you for the correspondence you have sent me and your prompting to reply to you by today's date.

I referred the SEPA letter and the Consultation to the engineer who carried out the flood study as he is better qualified to comment. I attach his comments which I received this week.

The reason for the review is to fully appraise whether the principle of a house on this site would be upheld. As such, we felt it inappropriate to involve the client in a full flood study which would have been a considerable expense. A flood study may have proved to be compatible but the planning permission may still have failed on one of the other policy issues.

We considered it more appropriate to carry out a desk-top appraisal which is what ENV Consulting Engineers were asked to do. The result, and I see that your own engineer concurs with our engineer, is that the proposed house floor levels are above the 1 in 200 year flood risk level.

However, using current flood design criteria one can assume that in the event of the 1 in 200 year flood, the whole of the central part of Blyth Bridge may be at risk so access to the new plot along with all the other homes in the nucleus may be impaired for the duration of the flood. This enigma occurs in many locations in Scotland and if such criteria were upheld for every planning application, one can assume that there would be little or no development in Scotland.

We ask the review board to consider carefully all the points I have raised in my submission. There are several additional points I should like to raise given the torrid times the world has encountered during the last few months.

- I consider this site to be suited for development and have made the point that development and its associated planting would enhance and complete the village. However, it must be stressed that such rural sites are at a premium, not so much financially but to enable people to live and exist in partial isolation within a community, an important factor which must not be forgotten after what has happened in the world.
- I further submit that planning policies should be flexing so as more people are encouraged to live a more rural existence, not merely co-habiting in confined spaces.

These considerations having been aired, I also understand my client is willing if the principle of a house on this site were to be successful, to redesign the building and produce a more design-aware solution. They would be willing to discuss this with the planning department. Indeed, they would be willing to accept conditions to fully address matters of ecology, landscaping and flood-risk, the latter where hopefully if more factual information became available, all parties could find a solution to the potential problem.

I look forward to hearing what the review board says, knowing they will give a robust appraisal of my earlier submission. That said, my opinion that we as a nation should be altering the way we consider living is also a valid point and not one any of us can disagree with. Planning should be minded of this and not waiting for another pandemic before sensible measures to live rurally are put in place.

Yours sincerely

Kanak Bose

Kanak Bose

Forwarded message -----

From: "russell@env-consultants.co.uk" <russell@env-consultants.co.uk>

To: 'Kanak Bose' <kanakbose@yahoo.co.uk>

Sent: Wednesday, 24 June 2020, 16:35:53 BST

Subject: RE: Blyth Bridge FRA

Kanak

I have been through both SEPA and SBC responses.

First of all ,and before going into technical debate I would like to confirm , I am a Civil Engineering Professional of some 35years experience. I have undertaken many such studies and hence I consider myself, as do my clients competent in such work.

The SBC response really just reiterates the SEPA comments although Ian Chalmers does agree that the FFL we have quoted is correct at 600mm above the stated 1/200 year level.

In detail ,there seems to be two arguments ,

1. The source and accuracy of flood info
2. Access capability.

It is frustrating for the industry that the base SEPA maps cannot be used by professionals for detailed assessment but they are frequently quoted by authorities as tools for decision making.

Notwithstanding that point other public information exists and these lend back up to the information presented . In particular, I refer to Messrs JBA Consulting whose commission, by SBC to assess flood risk across the Borders is widely accepted as a better data base.

To support the application OS/LIDAR topographical information was used to generate ground contours. These were checked against known datum and the accuracy deemed consistent for use .

In terms of flood data, both SEPA and JBA flood maps were overlain to generate the 1/200 year line for the site. The JBA editions were deemed more accurate and hence used for analysis.

This work show the house plot clear of the 1/200 year event and hence the FFL was set 600mm above , to with SBC agree in principle. Nominal floor raising could be implemented for outer-buildings and there is significant lands that compensatory storage could be generated.

The issue of access was raised based on the flood maps. We have to take this in context as the current proposal is via the existing housing development, which if the maps are correct are already below water. This has never happened. However , from the site boundary there is nothing to preclude lifting the access road on "Stilts" as it is private and can be designed to accommodate any such vehicles as needed. Taking this argument further there is no technical reason that access cannot be generated directly from the A702 ,across the burn and into the site.

FRA work is now very much model based but a practical view on the general topography and use has to be taken into account. From my walk over , there were features like upstream fence chokes and channel obstructions that have not been taken into account in the published models which would certainly alleviate/minimise the results.

In my view , at worst , the site could be conditioned and not just rejected.

I hope this is of assistance.

Regards

Russell

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