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If telephoning ask for:
Cerian Baldwin

12 December 2017

By email only to: epc@highland.gov.uk

Dear Ms Webster

The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017

Town and Country Planning (Scotland) Acts

Planning applications: 17/04601/FUL and 17/04404/FUL

Development of 18 hole golf course, erection of clubhouse, renovation of existing buildings for maintenance facility, pro-shop, caddy hut, workshop, administration building, information booth, formation of new private access from C1026 Land 1700M NW Of Embo Community Centre, School Street, Embo; and

Drilling of two boreholes and construction of water storage reservoir (maximum capacity 20000cu.m) for irrigation of (future) golf course Land 860M south of Coul Farmhouse, Skelbo, Dornoch

Thank you for your consultation email which SEPA received on 21 November 2017 regarding the above planning applications and accompanying Environmental Impact Assessment Report (EIAR) and EIAR Addendum.

Advice for the planning authority

We are disappointed that our extensive pre-application advice has not been followed and that our offer to review a draft EIAR was not taken up. During the pre-application consultation we provided detailed comments as to the scope of assessment required, the format in which information should be submitted and highlighted the opportunity to locate the golf course on nearby agricultural ground avoiding the sensitive environmental receptors. This advice has not been followed and we consider that there are likely to be significant adverse environmental impacts if the golf course is developed in its current form. We **object** until the further environmental information detailed below, and requested previously, is submitted and the site layout is modified accordingly. We also request that the **conditions** in Sections 7 and 8 be applied. If any of these are not applied then please consider these representations also as an objection.

For the avoidance of doubt, in this site specific instance, many of environmental issues within our remit may have an impact upon qualifying features of the designated sites. In line with our Joint land use planning working arrangements for SEPA and SNH (available from www.sepa.org.uk/environment/land/planning/advice-for-key-agencies/) we have drafted this response in consultation with SNH to ensure that relevant issues have been considered and that our advice is complementary.

1. Waste water drainage

- 1.1 At the scoping stage we advised that provided the volume of waste water drainage would be less than 125 Population Equivalent (PE) then we would accept a private waste water drainage solution in this site specific instance. We requested that this proposal should be detailed within the planning application, clearly shown on any submitted plans and supported by a compliant site investigation in accordance with Section 3.9 of the Technical handbook, including site slope, distance from drains, wells etc., depth to seasonally highest water table and percolation rate within 15 to 100 secs/mm.
- 1.2 None of this information has been submitted and therefore we **object** until the above information is submitted and demonstrates that waste water drainage can be accommodated on site without significant adverse environmental impact on any sensitive receptors. In particular, we note that the qualifying features of the designated are in hydraulic connectively with the groundwater surrounding the club house where welfare facilities are likely to be located.

2. Surface water drainage

- 2.1 Section 6.4 and 6.6.4 of the EIAR, Addendum 1 SUDS and Drainage – Drainage Devices – Device Calculations, the Temporary Drainage Plan, the Environmental Management Plan and the Construction Management Statement detail the proposed surface water drainage.
- 2.2 We note SUDS Drainage Plans 1 and 2. We understand from SUDS Drainage Plan 2 that surface water run-off from the parking areas and roof water from the caddies steading, shop and other buildings will be treated by a filter drain and swale. This meets the treatment requirements of [CIRIA C753](#) and therefore we have no objection to these elements of the proposals.
- 2.3 The temporary construction compound plan shows surface water drainage will discharge to a filter strip, then swale before discharging to a filter drain. It is unclear how close this is to the adjacent lochan and whether oil is to be stored within the construction compound. We **object** until it is confirmed the temporary construction compound and associated drainage are at least 6m from the lochan, that the proposed soakaway is located in an area which drains away from the nearby Groundwater Dependant Terrestrial Ecosystem (GWDTE) MG10a and that an oil interceptor will be installed within the surface water drainage system. The applicant should also note that any soakaway should be constructed as to be above the water table so as not to act as a groundwater drain.
- 2.4 We understand from SUDS Drainage Plan 1 that surface water run-off from the maintenance yard will also be treated by a filter drain and swale and that there will be a bunded wash down area discharging to a sealed unit. This meets the treatment requirements of [CIRIA C753](#) and therefore we have no objection to these elements of the proposals.

- 2.5 The temporary drainage plan details the proposed surface water drainage for roads, access tracks, hardstanding areas, haul routes, tracks, temporary construction compound, buildings and other construction areas. Given the use of fertilisers and herbicides in close proximity to GWDTE, we also requested plans showing land drainage from greens and fairways discharging to suitable SUDS devices to minimise these chemicals entering the water environment. The temporary drainage plan indicates that some of the proposed drainage will be discharging to or adjacent to GWDTE and we have provided comments on this above.
- 2.6 Please note we do not generally provide advice on the water quantity aspect of SUDS. Comments from Scottish Water, where appropriate, the Local Authority Roads Department and the Local Authority Flood Prevention Unit should be sought in terms of water quantity/flooding and adoption issues.

3. Disruption to Groundwater Dependant Terrestrial Ecosystems (GWDTE)

- 3.1 GWDTE are a type of wetland specifically protected under the Water Framework Directive and are sensitive receptors to the pressures that are potentially caused by development and therefore the layout and design of development must avoid impact on such areas.
- 3.2 In line with our Joint land use planning working arrangements for SEPA and SNH, we advise on the protection of GWDTE outwith designated sites and any GWDTE that are not qualifying features of designated sites. Advice on qualifying features of the designated sites should be sought from SNH.
- 3.3 In this site specific instance, we consider that the SSSI notified natural features that could be considered GWDTE include the dune slacks. Therefore the non-qualifying GWDTE that we are advising on includes areas of SD16, M15, MG9, MG10, MG11, M23, M25, M27, W1 and areas of CG10 within U4/SD7. SD16, M15, M25 and CG10 are listed as Annex 1 habitats as well as likely to be groundwater dependent. The applicant should note that CG10 is a type of GWDTE. Their ecological survey states this is not a GWDTE.
- 3.4 At scoping, we requested that the site be designed to avoid impacts upon GWDTE. Where GWDTE are not avoided then we required a detailed site specific qualitative and/or quantitative risk assessment to be carried out in accordance with our [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#). Unfortunately the information submitted does not clearly quantify the impacts upon GWDTE and it appears that significant areas of the development are located on GWDTE. We **object** until the information below is provided which demonstrates how the site layout avoids GWDTE and where GWDTE are not avoided how impacts will be mitigated.
- 3.5 The current scale of the habitat maps and GWDTE maps do not provide enough detail as to which habitats are likely to be directly or indirectly impacted and do not show the buffer zones of these GWDTE. We note that the documents entitled '1704601FUL Proposed Earthworks Areas No 1-5' show the areas proposed to be cut and filled but as there is no habitat information they do not show how the GWDTE have been avoided or appropriate buffer zones. 'Table B-18: Predicted Habitat Loss (land-take during Operation and Construction' identifies which habitats are likely to be directly impacted but does not highlight which of these are GWDTE and how much is within the designated habitat or outside of this. Therefore we are unable to assess the proposed level of habitat loss and it also does not take into consideration the amount that could be lost due to indirect impacts.

- 3.6 Proper consideration does not appear to have been made as to how vegetation changes to create playing surfaces could have indirect impacts on adjacent GWDTEs by altering the hydrological regimes and species composition. For example grass would be a drier habitat compared to adjacent wetland and may leave it liable to drying out. Where these habitats are directly impacted by creation of playing surfaces it would be preferable to keep the natural vegetation and planting of foreign species should be minimised in these areas. When we receive more detailed plans to show exactly which GWDTE could be affected, we will be able to advise further on this.
- 3.7 In addition, we have concerns about the proposed use of pesticide, herbicides, fertilisers and other chemicals in relation to their possible direct and indirect impacts on GWDTE via ground and surface waters and we require more information to be provided to demonstrate that they will not be adversely impacted. We note the buffer proposed on pages 31 and 34 of the Environmental Management Plan, however as the golf course is located on top of or directly adjacent to GWDTE, the buffers required by General Binding Rule 18 (GBR 18) of The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (As Amended) (CAR) cannot be accommodated. The buffer zones required by GBR 18 are also different for inorganic and organic fertiliser. The proximity of GWDTE to areas where these chemicals will be used needs to be defined on a map demonstrating that GBR 18 can be met rather than the applicant's assumption that differently managed areas of the golf course will act as buffers for others. We note that proposals are for slow release fertiliser to minimise risk of loss by leaching and that pesticides (fungicides) will only be used on greens and tees but given the proximity to GWDTE there will be an impact.
- 3.8 The access road, part of hole 15, the path north of hole 14, associated drainage, earth works and haul routes are located on GWDTE. Page 8 of Appendix B-7 classes some of these GWDTE as GWDTE and others as 'non GWDTE'. Normally the supporting NVC report would include target notes explaining why some are classed as GWDTE and why others are not. We note Section 6.3.7.9 provides some general narrative as to why some GWDTE may not be groundwater fed. Unfortunately target notes have not been included and therefore we are unable decipher the rationale for each GWDTE classification. Given some of the development is located on 'non GWDTE' areas we need to understand why they have been classed as non GWDTE.
- 3.9 As detailed below, we also do not consider that the potential impacts on these GWDTE through abstraction of water or alterations to groundwater level have been thoroughly assessed. In addition to groundwater quantity, if habitats are to be irrigated with different water than the existing conditions then this has the potential to alter the vegetation as many of the identified GWDTE habitats are sensitive to chemical changes as well as hydrological alterations. Page 38 of the Environmental Management Plan contains a section about water quality monitoring for the surface water courses but does this include the proposed ground water source for the irrigation and the baseline conditions of the wetland types? The only point at which this is specifically mentioned is within Annex C Hydrology and Hydrogeology Section 6.6.3 Summary of Protection Measures which states "*water quality will be continuously checked from abstraction sources to ensure compatibility with the existing hydrology and ensure that threshold levels are not exceeded for key indicators, notably PH salinity and heavy metals*". The chemical and hydrological regimes of wetlands can be very complex and are normally unique to each particular wetland type. The assessment needs to take this into account but needs to assess the likely impact now. Once the golf course is constructed and operational then it will be too late to reverse this damage as any mitigation needs to be in place from the outset, as much of the mitigation would relate to locating the green, tees and fairways away from GWDTE. This cannot be done retrospectively. In addition to the hydrological impacts from the groundwater

abstraction on GWDTE (requested in Section 4 below), the assessment should include the potential impacts of the abstractions on hydrochemistry of existing wetland habitats and an assessment of the chemistry of the proposed water source and the potential impact of any hydrochemical changes in wetlands receiving irrigation water, for example nutrient inputs from enriched irrigation water.

- 3.10 Section 2.3.4.2.4 of the EIAR outlines the green, tee-box and fairway drainage systems. These are also detailed on SUDS Drainage Plans 1 and 2 and the Temporary Drainage Plan. It is proposed that some areas will be built up with sand to above groundwater level and other areas will have field drainage using pipes in low lying areas which could get flooded out by higher ground. It is proposed that soakaways will avoid GWDTE but no information has been submitted on how the hydrological impact of permanent and temporary drainage systems themselves will impact upon GWDTE.
- 3.11 Sections 1.12.8 and 5.7.1 of the EIAR mention proposals for monitoring related to GWDTE within the SSSI and page 26 of the Environmental Management Plan also proposed monitoring. No specific monitoring details have been provided or what mitigation would be undertaken should an impact be found. Once the above impacts have been fully assessed and the golf course layout modified to minimise these impacts, then a monitoring plan must be submitted which details how impacts will be monitored and what mitigation options will be available to remedy any impacts.
- 3.12 Several documents refer to an Ecological Management Plan but this does not appear to have been submitted.
- 3.13 For information, we note that the proposed layout currently avoids areas of S27 and M6 and they are unlikely to suffer from indirect impacts so we do not require any further information on these habitats at this time.

4. Water abstraction

- 4.1 Planning application 17/04404/FUL includes the operation of boreholes and construction of a reservoir to provide a water supply for the golf course. The Groundwater Investigation, General Irrigation Requirements and Irrigation System Design Report and Environmental Management Plan detail the proposed borehole abstraction rates, reservoir storage and course irrigation regime. We have concerns regarding the quality of information supplied:
 - a) The figures are blurry and the precise location of the abstraction boreholes is uncertain.
 - b) The borehole logs provide a poor description of the lithology which is not in accordance to best industrial practice and available British Standard.
 - c) The logs do not show the boreholes construction details such as screened sections, cemented section, casing types, groundwater entries, groundwater resting levels etc.
 - d) The pumping test charts and the surface water flow charts are unreadable and cannot be easily compared with each other.
 - e) There are no groundwater levels reported in the document.
 - f) There is no technical interpretation of the drawdown curves and no attempts to technically justify the statement that “there is no measurable impact on the aquifer or indeed the SSSI water table when abstraction water during the test pumping”. Such statement would imply

that there is no groundwater drawdown in the pumping boreholes which is not what the pumping test curves show.

- 4.2 The information submitted is of insufficient quality for us to advise on the environmental impact of this abstraction and the consentability of this water abstraction under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (As Amended) (CAR). Of particular concern is the potential for draw down of the groundwater with subsequent adverse impacts upon the dune slacks within the designated site. SNH advise upon impacts upon designated sites but would require advice and information from us on the likely impacts upon groundwater before they can do this. Due to the insufficient information we are unable to advise on the likely impacts upon groundwater.
- 4.3 We **object** until the information detailed below is submitted and demonstrates that there is unlikely to be a significant adverse environmental impact upon groundwater.
- 4.4 The applicant needs to submit the pumping test numerical datasets in electronic format inclusive of hydrogeological interpretation of the findings and the assessment of impact on groundwater receptors. This is particularly important as the limited borehole logs provided in Table 5 and 6 of the Groundwater Investigation show possible hydraulic continuity between the surface water features (including GWDTE) and the bedrock aquifer where the abstraction is taking place.
- 4.5 For information, the period of time utilised by the applicant to produce the pump test results is standard practice for a CAR abstraction pump test. Should the applicant eventually get CAR authorisation to operate the abstraction, then the CAR licence will require ongoing monitoring. Should it be that this long term monitoring highlights an environmental impact then we will require a reduction to the abstraction and it may be that the applicant would require greater storage capacity to offset the reduction in abstraction.
- 4.6 We are also disappointed that the opportunity to design the reservoir as a more natural waterbody with biodiversity opportunities has not been taken. Best practice is now to design reservoirs so that they appear to be a natural part of the landscape and provide greater biodiversity.

5. Existing ground water abstractions

- 5.1 Section 6.3.7.7 of the EIAR indicates that no existing ground water abstractions are located within 250m of the proposed developments and therefore it is unlikely that the shallow excavations such as the borrow pits, building and roads construction will impact upon these.
- 5.2 As highlighted in Section 4 above, due to a lack of information we are unable to advise on the impacts from the proposed water abstraction. This could impact upon receptors up to 850m away from the abstraction. This includes some existing groundwater abstractions and therefore until the above information is submitted we **object** due to a potential impact upon existing groundwater abstractions.

6. Borrow pits

- 6.1 The information we requested at the scoping stage has only been submitted for Borrow Pits 1a, 2 and 3. These are located within 100m of GWDTE, the drawings state that Borrow Pit 1a will be excavated to a depth of 4m and that Borrow Pits 2 and 3 to a depth of 2m. Groundwater levels at the sites have not been provided. Section 6.3.7.4 of the EIAR states that groundwater is likely to be close to the topographic profile. It is likely that borrow pit

excavation will encounter groundwater. Any dewatering will be potentially impacting on groundwater receptors including GWDTE. We therefore **object** until the applicant confirms the groundwater levels at the borrow pit sites and provides a dewatering plan inclusive of a quantitative risk assessment for any receptor located within a radius of 250m (e.g. drawings show GWDTE within the 100m and 250m radii of borrow pit 2 and 1A).

- 6.2 The Proposed Finished Contours Drawings 1-5 show another 3 borrow pits but the information we requested for these borrow pits at the scoping stage has not been submitted. We **object** unless these 3 other borrow pits are removed from the plans or until a site specific plan of each borrow pit is submitted detailing the information below and demonstrating no significant environmental effect in accordance with [Planning Advice Note PAN 50 Controlling the Environmental Effects of Surface Mineral Workings](#) (Paragraph 53).
- a) Location, size, depths and dimensions of each borrow pit;
 - b) Existing water table and volumes of all dewatering;
 - c) Proposed drainage and settlement traps, turf and overburden removal and storage areas; and
 - d) Restoration profile, nature and volume of infill materials, and, if wetland features form part of the restoration, management proposals.

7. Protection of the surface waterbodies

- 7.1 For holes 13 and 14, Addendum 2 Watercourse Engineering Plan shows a proposed bridge, significant earth works and possible realignment of the watercourses. In addition, Section 2.4.7 of EIAR states that burns will be 'cleaned to maintain good flows'. Table B.16: Summary of Predicted Operational Habitat Loss (Land-take) and Parameters also indicates that 550m² of ponds will be infilled but it is unclear where this is occurring.
- 7.2 As detailed previously our preference is that water features including bank areas are left in as natural a state as possible. We **object** unless earthworks are set back at least 6m from waterbodies in order to maintain their natural state.
- 7.3 We note from Addendum 2 Watercourse Engineering Plan that four bridges are proposed as part of boardwalks. We are unclear whether these will involve in-river works and therefore request a **condition** which ensures that there are no in-river supports and the abutments are set back from the banks of the watercourse. We have also requested a condition regarding the bridges and flood risk below so it may be these two conditions could be merged.

8. Flood risk

- 8.1 As detailed at scoping, we note that based on the proposed masterplan plan it appears only the lower lying parts of the course, near the coast, are within the indicative extent of the SEPA Flood Map and that no buildings are proposed in these areas. We note that the fairways, tees and greens are located within these areas so highlight this as a potential commercial risk to the developer.
- 8.2 As detailed in Section 7 above, we are unclear whether there are proposals to realign any of the watercourses and have asked for the proposals to be modified. Should this still be proposed then we will require a Flood Risk Assessment to demonstrate that the new

channel has capacity to adequately contain the 1 in 200 year flow, plus an appropriate freeboard, as not to increase flood risk elsewhere.

- 8.3 We also note from Addendum 2 Watercourse Engineering Plan, and Watercourse Engineering Details and Photos, that four bridges are proposed as part of boardwalks. Watercourse crossings should be shown to be adequately sized to enable them to convey the 1 in 200 year design flow at each point without causing constriction of flow or increasing flood risk elsewhere. Some details of the bridge and channel sizes have been submitted but not all. These locations are unlikely to exacerbate flood risk elsewhere but should be designed to maintain the natural flows of the river.
- 8.4 We therefore request that a **condition** is applied which ensures that all proposed bridges are designed to accommodate the 1 in 200 year design flow at each point without causing constriction of flow or increasing flood risk elsewhere.

9. Forest removal and forest waste

- 9.1 At the scoping stage we requested a map demarcating where felling will take place and a description of what is proposed for this timber. Section 10.1.2 of Annex A-SD2 states that full plans indicating areas where tree removal will take place have been provided as part of the Planning Submission. These do not appear to have been submitted. Section 2.4.3 of the EIAR confirms that timber will be removed off site and that brush will be re-used in landscaping. We are unclear of the volumes of material being re-used on site and whether these will confer ecological benefit. We **object** until a map demarcating where felling will take place and a description of what is proposed for this timber is submitted in accordance with [Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS](#).

10. Construction Environmental Management Plan

- 10.1 Section 2 and 6 of the EIAR, the Environmental Management Plan and the Construction Management Statement contains the principles of the proposed construction methodology.
- 10.2 At scoping, we requested that the applicant systematically identified all aspects of site work that might impact upon the environment, potential pollution risks associated with the proposals and identify the principles of preventative measures and mitigation. We requested this to be included in a schedule of mitigation supported by site specific maps and plans.
- 10.3 In this case we specifically asked that the submission concentrates on covering (1) soil management - good practice stripping and storage practices, including a plan showing main temporary storage areas, (2) protection of the waterbodies, and (3) detailed information on how works on the designated sites will be managed during the works, including the mitigation measures proposed to ensure that the works do not result in downstream pollution.
- 10.4 As detailed throughout this letter, the site specific plans have not been submitted and neither has a schedule of mitigation been submitted. Without this, we are unable to fully assess the likely environmental risk from pollution to sensitive receptors across the site. Given the most sensitive receptors, GWDTE and the surface water features, are the lowest points of the site then it is crucial that site specific maps and plans are submitted and demonstrate no significant adverse environmental effect. We **object** until this information is submitted.

11. Golf Course Management Plan

- 11.1 Annex A SD12 – Golf Course Management Plan contains a document entitled ‘Demolition Statement in relation to former steading at Coul Farmhouse’. The EIAR states that a Golf Course Management Plan has been submitted. There appears an omission and therefore we **object** until the Golf Course Management Plan is submitted.

12. Earthworks

- 12.1 We note the submitted earthworks plans and temporary drainage plan. It is our understanding that all earthworks including the storage of any material will be included within this footprint. Section 2.4.5 of the EIAR and Appendix 2 of the Construction Management state that 25112m³ of sand is required for site regrading. We understand this is being sourced from the on-site borrow pits. These documents also indicate that all soils and sand will be re-used on site and that there will be no surplus materials. We also understand the aggregate and materials from the temporary haul routes will be removed and re-used with the site construction.
- 12.2 Provided this is the case, then we have **no objection** on this issue except in relation to the waterbody engineering detailed in Section 7 above. Should this not be the case then please re-consult us with the detailed plans showing the full extent of the earthworks and a soils balance calculation demonstrating that the works accord with our sustainable reuse of greenfield soils in construction guidance which is available from www.sepa.org.uk/regulations/waste/guidance/.

Regulatory advice for the applicant

13. Regulatory requirements

- 13.1 Authorisation is required under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) to carry out engineering works in or in the vicinity of inland surface waters (other than groundwater) or wetlands. Inland water means all standing or flowing water on the surface of the land (e.g. rivers, lochs, canals, reservoirs).
- 13.2 Management of surplus soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.
- 13.3 You may need to apply for a construction site licence under CAR for water management across the whole construction site. These will apply to sites of 4ha or more in area, sites 5 km or more in length or sites which contain more than 1ha of ground on a slope of 25 degrees or more or which cross over 500m of ground on a slope of 25 degrees or more. It is recommended that you have pre-application discussions with a member of the regulatory team in your local SEPA office.
- 13.4 If the proposed reservoir is going to hold 25,000 m³ or more of water above the natural level of the land then it will fall under the Reservoirs (Scotland) Act 2011. We have produced a number of guidance documents and briefing notes for reservoir managers to help them comply with the legislation and these can be found at www.sepa.org.uk/regulations/water/reservoirs/
- 13.5 Details of regulatory requirements and good practice advice for the applicant can be found

on the [Regulations section](#) of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the regulatory team in your local SEPA office at Graesser House, Fodderty Way, Dingwall Business Park, Dingwall IV15 9XB
Tel: 01349 862 021.

If you have any queries relating to this letter, please contact me by telephone on 01349 860415 or e-mail at planning.dingwall@sepa.org.uk

Yours sincerely

Cerian Baldwin
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Planning Service

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Disclaimer

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our [website planning pages](#).