

Our ref: PCS/114157
Your ref: 09/99818/FUL

Planning & Development Department
North Lanarkshire Council
Municipal Buildings
Kildonan Street
Coatbridge
ML5 3LN

If telephoning ask for:
Lorna Maclean

21 June 2011

FAO: Gordon Liddell

By email only to: eConsultation@northlan.gov.uk

Dear Sir/Madam

Town and Country Planning (Scotland) Acts
Planning application: 09/99818/FUL
Surface Water discharge – discharge of condition 9
St. Ambrose High School Campus, Coatbridge

Thank you for your consultation email of 6 June 2011.

We **object** to this planning application on the grounds of lack of information. We will remove this objection if the issues detailed in Sections 1.7 and 1.9 below are adequately addressed.

Advice for the planning authority

1. Surface Water Drainage

- 1.1 The SUDS design has been discussed with SEPA's regulatory team and it has been agreed that conventional infiltration methods such as swales are not suitable due to contamination issues.
- 1.2 We advised that the assessment of risk suggests that there is a potential to mobilise hazardous (list 1) substances to groundwater in the vicinity of the previously proposed soakaway features. Current SUDS guidance generally advises against allowing infiltration on brownfield sites.
- 1.3 This current application indicates the following details which suggest the possibility of infiltration
- 1.4 Drawing no NLC-STA-DRG-C-113 rev C02 shows the presence of a filter drain prior to connection into existing pipe between S41 and S43 in south eastern corner of site. This stretch is shown as solid pipe in Rev C01 of this figure contained in report Risk Assessment of the Water Environment (Ramboll UK Ltd April 2011).



Chairman
David Sigsworth

Chief Executive
Dr Campbell Gemmell

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5 Redwood Crescent, Peel Park,
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- 1.5 Filter drain detail in drawing NLC-STA-DRG-C-403 indicates the drain trench to have a geotextile surround.
- 1.6 Land drain detail in drawing NLC-STA-DRG-C-403 indicates the drain trench to have a geotextile surround. The Land drains do not appear to connect into any further network implying infiltration in these areas.
- 1.7 We would request the following clarification:
- What is the specification of this geotextile in the Filter drain and land drain drawings? Is it designed to prevent infiltration.
 - What is the purpose of the filter drain between S41 and S43
 - What is construction of the cellular storage tanks? Are they designed to prevent ingress to groundwater? The figure showing this construction detail has not been included in this application
 - What is the construction of the playing fields? Is infiltration expected?
- 1.8 We would advise that infiltration to ground has still not been demonstrated as a suitable mechanism for dealing with surface water drainage in these areas (areas of land drain and filter drain). The presence of historic fill material and the existing leachate data contained in the Ramboll report of April 2011 suggests that the mobilisation of hazardous substances to groundwater is likely. Should infiltration to ground be proposed it is necessary to demonstrate that hazardous substances will not be mobilised to groundwater in these areas. Considering the shallow groundwater levels and recent groundwater upwelling issues at the site, it is considered that infiltration is not an appropriate mechanism for surface water drainage at this site.
- 1.9 It is unclear what the hardstanding areas outwith car parking areas are to be used for. If they refer to roads then it should be noted that the tank which has been included as a form of treatment cannot be counted as a form of SUDS, and an additional level would need to be provided. If it is however referring to playground areas one level of SUDS should be sufficient. We would ask that further confirmation of the use of the hardstanding areas is provided.

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.

Regulatory advice

2. Regulatory requirements

- 2.1 Details of regulatory requirements and good practice advice for the applicant can be found on our website at www.sepa.org.uk/planning.aspx. 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:

SEPA East Kilbride office
Orbital House
3 Redwood Crescent
East Kilbride
G74 5PP

If you have any queries relating to this letter, please contact me by telephone on 01355 574 200 or e-mail at planning.ek@sepa.org.uk.

Yours faithfully

Lorna Maclean
Senior Planning Officer
Planning Service

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