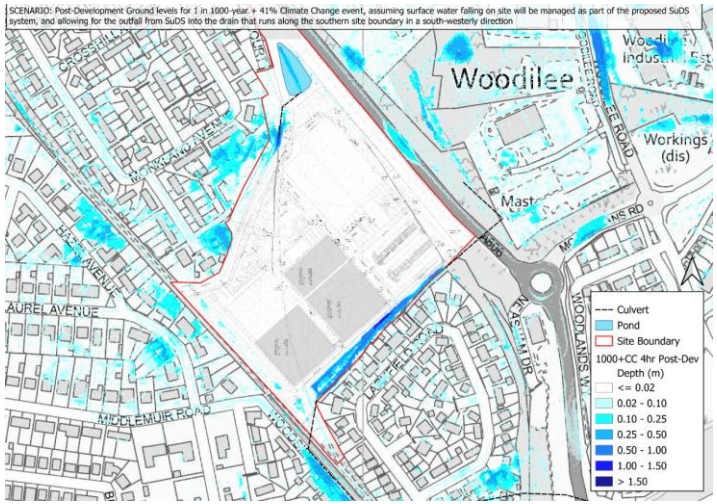
Whitegates Park (TP/ED/26/0104) – EDC Flood Risk Officer Response 27 March 2026

Consultee Comments	Applicant Response
I refer to the above subject application regarding flood risk. Having reviewed the Flood Risk Assessment (FRA) and supporting information I can respond as below. 1. This is a vulnerable development (School) and the site should be assessed for flood risk up to a 1 in 1000-year flood event. Can the applicant please review and include for this in the FRA undertaken by kaya Consulting dated February 2026.	1 in 1000 year plus climate change flood map provided below. Site is protected up to this event. 
2. Flood Risk would request that SEPA are consulted regarding flood risk and any feedback provided for review due to close proximately to local watercourses and it being a vulnerable development.	SEPA have provided a consultation response and a separate response to these comments has been issued.

3. No overland flow plan or information has been provided for the 1 in 200 plus CC and 1 in 1000 year. This is to ensure the proposed development is not at risk of flooding. A plan should provide showing all proposed ground and finished floor levels in extreme rainfall return event and show areas where ponding would occur away from vulnerable development.	Please see updated drawing reference 'LZAC-CUR-XX-ZZ-DR-C-92004-P03-Exceedance Plan' which represents an exceedance routing plan.
4. The applicant will require to provide a plan showing dry ingress and egress route from the development.	Please see the following newly submitted drawing: LZAC-CUR-XX-ZZ-DR-C-92005 P01 – Safe Route of Ingress and Egress. For reference; safe pedestrian access and egress route is available via various routes to north eastern, north western and south western boundaries.
5. The FRA highlights a Scottish Water trunk main located in the development. Can a separate plan be provided showing the line, route and location of this main including showing its effect to the site should it burst causing exceedance flows across the site. What emergency measures are being deployed should such an event occur.	The existing water main has been latterly surveyed for line and level. It essentially runs parallel to Initiative Road, circa 30m into the site. This is shown on drawing reference LZAC-CUR-XX-ZZ-DR-C-92001-P15-Drainage Strategy Layout.pdf The trunk main is to be moved outwith the development footprint. It's likely construction here will be within a duct. For information, the trunk main is located well below the bulk of ground levels and any water will follow proposed/existing topography to its outfall/ watercourse.

Surface Water Channel 1 (Larkfield Ditch) 6. Are there proposals to realign or improve the existing ditch to the rear of Larkfield Road as part of these works. Could a two-stage channel be proposed for this section of burn with landscaping and planting proposals.	The current proposals assume the southern side/bank of the southern watercourse will remain as existing, including vegetation and bank slopes, although the profile/gradient of the bank varies here. The northern side/bank is to be newly formed, some of it with a green bag work retaining wall (Flex MSC product or similar) immediately adjacent the car park and eastern most pitch. However, the potential for the low flow channel is now much wider, as can be seen in the image extract below from drawing reference LZAC -CUR-XX-ZZ-DR-C-90002 rev P14 (Proposed Site Levels).  South of this point (broadly half way along) the alignment of the northern side/bank moves away from the existing channel line and as such provides a two-stage channel arrangement. Green bit remains as a wet/low flow channel, with an upper bank, with a 1:3 side slope, lies c.12m away. As a side note the blue lines represent the contours of the proposed levels. The closely packed contours represent a slope bank. It is therefore considered that a two stage channel is already proposed, albeit not for the full length, with the watercourse enhanced beyond the existing condition. Existing habitat and vegetation within this area is to be retained where possible.
7. Flood compensatory storage is being removed from the burn due to	This is not strictly true. There is no ‘flood compensatory storage’ merely an area prone to flooding. However, this is due to near 100% blockage of the downstream culvert.

proposed pitch extents. How is this being compensated or mitigated.	The proposed removal of the downstream blockages will reduce the flooding seen. It should be noted that should 'flood compensation' be required (not anticipated), there is scope for such beneath the pitch, which is presently proposed at a much higher level and supported from a piled raft slab. The SEPA ban on development on a functional floodplain relates to fluvial flooding. This flood risk is pluvial (surface water) and we believe it is caused by a blockage of the culvert only. The blockage is to be cleared. Therefore, the development will not affect a functional floodplain. The use of the term 'functional floodplain' is purely precautionary.
8. Flood Risk are aware of issues d/s of the open burn as it enters inlet at trash screen flowing into a stone cundie. Are there proposals / mitigation to replacing this cundie with a pipe to minimise flooding in this area and to properties to the rear of Larkfield Road. See section 6 of the FRA – Flood Mitigation measures.	This culvert is blocked from discussions so it will need to be unblocked or replaced or similar. The intention is to clear any blockages at the right time. Offsite drainage connectivity needs to be understood and proven to either the canal feeder or Bothlin Burn. Investigations undertaken thus far has discounted the Canal Feeder but a link to Bothlin Burn remains unproven - a survey is to be undertaken imminently. No intention to 'culvert' any of this existing watercourse (goes against policy regardless). The proposed removal of the downstream blockages will greatly reduce the flooding seen.

9. The line, condition, and route of Larkfield ditch (surface water channel 1) will require to be determined and any mitigation required be undertaken to ensure this is flowing clear prior to any discharge proposals from the site. No information of this has been provided to support the application.	Topographical survey undertaken and shown on Drainage Strategy proposals (layout plan). Existing watercourse isn't currently 'flowing' nor 'clear'. Downstream culvert near 100% blocked. Cleansing and survey are ongoing. Removal of the downstream blockages will greatly reduce the flooding seen.
10. We raise concerns as to how access and inspection of this open section of burn and its outfalls and inlets are to be inspected and maintained in future. Are there proposals to create an access route between the open burn and high retaining walls which support the football pitches. The Council have a responsibility to ensure this section of watercourse can be inspected safely sand ensure any proposed trash screens can be cleared minimising flood risk.	Appropriate access for maintenance will be provided. Much of this will be available from the adjacent access path which runs parallel, site wide, for much of the length.
11. I have attached our drainage officer's response for applicant in relation to Scottish Water's asset.	A separate response has been issued in relation to the Drainage Officers consultation comments.

Response to additional comments by the Planning Case Officer on 21st May 2026	
1. The agent should make a pre-development submission (PDE) to Scottish Water with estimated quantities of foul and surface water discharges into the foul, surface water, and combined sewerage serving the site, and also an estimate of the water demand required. This allows Scottish Water to check the capacity of the treatment works, the affected sewers, and the available water supply, all impacted by the development. It is then for Scottish Water to request a DIA (Development Impact Assessment) if the available capacities within either the treatment works or the sewerage are questionable.	A DIA has been requested by Scottish Water for the foul water outfall only. This has been progressed and results suggest the treatment works are suitable to handle the generated development flows.
2. In this case, it is understood that Scottish Water have confirmed there is no discharge being taken into the surface water sewerage network from the development which is why they have not asked for a Development Impact Assessment. Of course, we know the surface water from the development is being discharged	The proposals do not increase the area discharging to the relevant surface water channels and surface water will be attenuated meaning surface water discharge would be anticipated to be reduced compared to existing. CAR licenses have been superseded by the EASR License. Licenses are not normally required where the receiving waterbody is not shown on the OS 1 in 50K maps. Maps such as this mean work can be covered under SEPA general Binding Rules.

into water courses that Scottish Water also rely on further upstream and also further downstream and we know the said water courses are prone to flooding before this additional discharge is added. The developer's consultants should therefore apply for a CAR License to generate a reaction from SEPA, or SEPA raise an objection against the proposals. I believe SEPA have objected on the basis of insufficient information. It will be necessary for the developer to prove that their proposals do not cause flooding either upstream or downstream of the new discharge point and this will require a detailed study of the relevant water courses. This has not been carried out to date and thus the development proposals cannot be verified.	
3. Drawing number LZAC-CUR-XX-ZZ-DR-C-92001 P14 entitled Drainage Strategy Layout shows the bulk of the surface water run-off entering the culvert/burn to the south (South Catchment Outfall) whilst around 30% of the rainwater run-off enters an existing ditch to the north at the same location as a	The interpretation of the drawing 92001 is correct. The 'locations, elevation and viability of connection to be further investigated" is for physical connection purposes. We currently have, mostly, existing chamber invert levels but don't have exact details for each pipe. We don't anticipate wild invert changes, once exposed/explored. Any surface water outfall is also subject to LLFA/EDC/Scottish Water/SEPA approval.

surface water sewer. The drawing notes “Location, Elevation, and Viability of Connection to be Further Investigated.”	
4. There is a note on the drawing stating that the catchment of the water course into which the South Catchment Outfall discharges includes “10 hectares from west of the A806 Initiative Road and 4.5 hectares from east of the A806 road”. It also picks up surface water inflows from surface water sewerage serving the Larchfield area, surface water sewerage serving the Woodside Avenue area, and a culvert extending from Lenzie Moss and presumably numerous connections from the roads and houses between the Moss and the culverted/burn, none of which has been mentioned or discussed in any of the documentation explaining the drainage strategy. The Drainage Strategy recommends that a Drainage Impact Assessment is carried out by others. To what are they referring with this statement? Do they mean a Development Impact Assessment?	Offsite drainage connectivity needs to be understood and proven to either the canal feeder or Bothlin Burn. Investigations undertaken thus far has discounted the Canal Feeder but a link to Bothlin Burn remains unproven - a survey is to be undertaken imminently. Outfalling all surface water to the north by increasing that discharge (beyond 9.4l/s) is not possible, according to EDC LLFA/ Flood Team. As such, the southern link/connectivity needs to be cleared and established. This southern watercourse and it’s outfall link to Bothlin Burn remains a district wide drainage network problem, not just in relation to the application site. Dialogue is ongoing with EDC/LLFA who are aware of the situation.

	Are they referring to sewers, or the water course? Or have they used the wrong terminology? One thing is for sure, there is no way of confirming whether these proposals will work until there are numerous investigations carried out to the existing culverts, the existing sewers, and the water courses/burns/ponds/basins on which this entire development depends. It is inconceivable to think that so much effort has gone into this planning application, yet there is not one aspect of the drainage/sewerage proposals that can be verified to date; the drawing is littered with uncertainty.	