

**Land Contamination and impacts on the water environment  
March 2021**

Overview

<i>General Comments</i>
Scottish Water notes that this document aims to give greater clarity on when remediation of land contamination is required and sets out an approach for prioritising areas for remedial action.

Detailed Response

<b>Specific Comments</b>

<b>4</b>	<b>Do you think we have clearly described the roles and responsibilities?</b>
Yes	
<b>5</b>	<b>Appendix 1, Table 2 sets out the assessment criteria. Is it clear and helpful?</b>
Yes, the table is clear and helpful, although it can take some time to assimilate it.	
<b>6</b>	<b>Appendix 2 sets out how to assess impacts on surface waters. Is it clear and helpful?</b>
Yes	
<b>7</b>	<b>We think that changing the description of “significant pollution” in relation to the future groundwater resource will only have a minor impact on the number of sites that will be designated as Part IIA Contaminated Land. Do you agree?</b>
Scottish Water has no comment.	
<b>8</b>	<b>In Appendix 5 we have produced a list of the raw data we would wish to see in support of a site assessment. Do you think this list is helpful? Is there anything missing?</b>
Yes, Scottish Water thinks that the list is very helpful but would request that a simple geology map is included, as it is a step in putting the conceptual site model together.	
<b>9</b>	<b>This section explains how to assess the impact of a site on the water environment. Do you think this section is clear? Is there anything missing?</b>
Scottish Water has no comment as this question may be for those who routinely do these assessments or reviews.	

<b>10</b>	<b>Appendix 3 states that SEPA expects the remediation of the sources of groundwater hazardous substances as far as practicable. Do you agree with our definition of sources?</b>
Appendix 3 states "Sources are considered to include" we consider that a full list of sources and activities associated with causing contamination in Scotland should be set out.	
<b>11</b>	<b>Appendix 3 sets out our expectations for remediation to address impacts on the future groundwater resource. Do you agree with our proposals?</b>
Yes, Scottish Water agrees with the proposals.	
<b>12</b>	<b>In Appendix 3 we state that where the impact is on groundwater resources we will normally expect remedial action to prevent expansion of the plume or an upward trend in concentration at the source and to secure a long term downward trend in contaminant concentration such that the groundwater resource will be restored to good status within an agreed reasonable timescale. Do you think we should provide detail on what a reasonable timescale is?</b>
Yes, Scottish Water think details on reasonable timescales should be provided, where possible.	
<b>13</b>	<b>The Scottish Government have consulted on whether a record of any residual land contamination should be kept. Give us your views on the practical content and logistics of this register.</b>
Scottish Water asks that this register is included as part of the SEPA water-environment-hub mapping.	
<b>14</b>	<b>Do you think the guidance is clear and easy to read?</b>
Yes, Scottish Water found it to be helpful and informative and, whilst it contains a lot of information, it is clear and accessible.	
<b>15</b>	<b>Is there sufficient information in the guidance to enable you to undertake or review an assessment and inform a decision on the action?</b>
Scottish Water has no comment as this question may be for those who routinely carry out these assessments or reviews.	