

# Comments for Planning Application TP/ED/26/0104

## Application Summary

Application Number: TP/ED/26/0104

Address: Whitegates Park Middlemuir Road Lenzie East Dunbartonshire

Proposal: Erection of a secondary school including road access, landscaping, car parking, sports pitches, recreational areas and associated development.

Case Officer: Fraser McNair

## Customer Details

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I wish to register my strong objection to the proposed development at Whitegates Park. This

proposal is fundamentally flawed, noncompliant with planning policy, and poses significant, unmitigated risks to public health, climate resilience, and community wellbeing. My objections are detailed below.

### 1. Severe, Unmitigated Contamination and Public Health Risks

The Council's own reports (Curtins Consulting, 2025) confirm severe contamination of the site, including:

- Lead: 1,400 mg/kg (over four times the school threshold of 310 mg/kg).
- Benzo(a)pyrene: A carcinogen, found above safety limits.
- Asbestos: Fibres detected in two locations - no safe level of exposure exists.
- Nickel: Exceeded health thresholds in multiple samples.

Despite these extreme levels, inadequate physical remediation is proposed. Contaminated soil will be reused onsite, with risk downgraded to "Low" via computer modelling that ignores realworld scenarios such as flooding, future repairs and damage due to standard child play. This is an unacceptable risk management strategy that prioritises cost savings over child safety.

### 2. Loss of Protected Green Space & Fundamental Policy Breach

Whitegates Park is designated protected green space under LDP2 Policy 4 (Community Facilities) and Policy 17 (Natural Environment). The proposal would permanently remove a vital community asset used daily for walking, cycling, dogwalking, informal football, and recreation.

Policy requires open space to be protected unless robust evidence demonstrates that alternatives have been fully assessed. No transparent siteselection evidence has been provided. This represents a fundamental breach of planning policy.

The Committee resolved on 3 February 2026 to make a Tree Preservation Order covering Whitegates Park, with statutory consultation to follow. This decision is a material consideration and must be taken into account in the assessment of this application.

#### Safeguarding of public path access

The development should not result in the loss, restriction or downgrading of existing public or core path access through Whitegates Park. All re-provided paths must be clearly segregated from school operational areas, be publicly accessible on a 24-hour basis, and deliver no reduction in route choice, convenience or permeability compared with the existing park layout. Details must be

submitted and approved as part of the planning application and shall not be deferred to post-consent management arrangements.

The proposal would remove a large area of public parkland in a town that already has a deficit of public park provision, directly conflicting with NPF4 Policy 20, which requires development not to exacerbate deficiencies in green infrastructure.

#### 3. Community Wellbeing and Accessibility

Whitegates Park is one of the only freely accessible greenspaces in this part of Lenzie. Its removal would disproportionately impact families, older residents, and those with mobility issues. A fenced school campus is not a genuine replacement for open, public space. Relocating greenspace proposed for mitigation to central Lenzie is inequitable. It removes a vital asset from the eastern boundary - already identified in the Council's Open Space Strategy as underserved - and

transfers it to an area that is already wellprovided. This exacerbates inequalities in access to greenspace.

The proposal involves removing a valued playing field, which has not been replaced like-for-like as national guidance requires

#### 4. Flood Risk, Climate Resilience and Contaminant Mobilisation

SEPA flood maps classify parts of the site as having a 10% annual chance of flooding. The drainage plan does not show assessment of how floodwater would mobilise contaminants across the site and into local systems.

Replacing permeable greenspace with hard surfaces worsens surfacewater runoff, reduces climate resilience, and undermines national climate adaptation policy. Building a school on a contaminated, floodprone site is reckless.

#### 5. Unjustified site selection

The Council's statutory consultation does not demonstrate public support for building a school at Whitegates Park. The consultation question asked only whether people supported the idea of a new school in principle, not whether they agreed with the location.

The Consultation Report itself confirms that many "Yes" responses were conditional ("yes, but not at this location") and that "many of the comments against the proposal are in relation to the proposed site (Whitegates Park)".

It also states that all comments about the site were deemed outwith the remit of the consultation

and therefore not evaluated in determining overall support levels.

The outcome cannot therefore be relied upon as evidence of community support for development on Whitegates Park, nor can it be used to justify overriding Local Development Plan protections for designated open space.

The proposal requires full scrutiny through the planning system, where the suitability of this specific site must be assessed for environmental impact, policy compliance, accessibility, loss of public open space and alternatives.

#### 6. Inadequate and Inequitable Biodiversity Mitigation

The proposed creation of a new park at the vacated school site is not "like for like" mitigation. It fails to compensate for the mature biodiversity and wellused greenspace that will be destroyed. Relocating green space away from the eastern boundary to central Lenzie exacerbates existing imbalances in provision and reduces accessibility for those with mobility issues. This is inequitable and contrary to the Council's own Open Space Strategy.

A recent Technical Note confirms a change in approach to Myrtle Avenue, which is no longer being progressed as secured off-site mitigation within the Whitegates Park application, but instead as a separate major planning application. This represents a material change that affects how mitigation and policy compliance can properly be assessed at this stage.

#### Change of use

If this application seeks to reclassify Whitegates Park from protected open space, it is procedurally unsound. The LDP2 designation remains in force, and any change of use must be made through a formal amendment process, subject to consultation and examination. Attempting

to bypass this process via a planning application would conflict with the planned system required under the Town and Country Planning (Scotland) Act 1997 and NPF4.

#### 7. Traffic, Parking and Transport Sustainability

The Transport Assessment underestimates the likely traffic impacts and congestion around Initiative Road and surrounding residential streets, raising concerns about road safety and suitability of the location for a school of this scale.

The development will generate substantial traffic, with inadequate provision for parking, dropoffs, and safe access for pedestrians and cyclists. Several junctions are already at capacity.

Public transport connections do not effectively serve the likely catchment, forcing reliance on private cars. This undermines sustainability objectives and worsens congestion and safety risks. Crossings are as yet uncommitted.

#### 8. Inadequate and Flawed Consultation Process

The consultation has been insufficient and opaque. Many residents were not properly engaged, and no transparent evidence has been provided to justify why this protected site was chosen over alternative, policycompliant locations. This undermines public trust in the planning process.

Council officer's own emails (June-July 2024) released following FOI, admit the existing school site was feasible, but instead of presenting councillors with an acceptable design, they worked to prove it "doesn't fit" in order to defend Whitegates Park. Internal overlays comparing the sites were circulated but withheld from public release. This shows the site selection process was

biased, predetermined, and procedurally unfair. Councillors were misled and the planning application rests on a flawed foundation.

- Officers acknowledged feasibility but dismissed it as "not acceptable to Education."
- Councillors were denied a fair choice.
- Overlay documents exist but were withheld.
- The process was about defending the use of Whitegates Park, not objectively testing options.

#### 9. Failure to Require Environmental Impact Assessment (EIA)

The Council's decision that an EIA was not required was flawed. This is a major development on protected greenspace involving contamination, flood risk, biodiversity loss, and public health concerns.

The absence of an EIA undermined transparency, precaution, and accountability.

10. The scale and massing of the proposed buildings would significantly alter the character and appearance of this open green space.

The Noise Impact Assessment acknowledges that sports pitch activity may raise noise levels by up to 10 dB above evening background levels, which the Sport Scotland guidance cited in the report defines as a substantial adverse impact. The modelling also assumes only one rugby and one football match occurring simultaneously and relies on generic source levels, despite the report acknowledging that spectator and coach shouting are often dominant noise sources. The assessment therefore appears to underestimate the potential noise impact on nearby residential properties.

#### Conclusion

The proposal for a new Lenzie Academy at Whitegates Park is unsound. It fails to address catastrophic public health risks from severe contamination and flooding, breaches core planning policy, undermines climate resilience, and sacrifices a vital community asset without justification. I urge the Planning Authority to reject this application in its entirety and to direct the Council to pursue a policy-compliant solution on a suitable, alternative site that does not sacrifice protected greenspace or endanger public health.