Planning

From: [redacted]
Sent: 24 October 2026 01:30
To: [redacted]
Cc:

Subject: Planning Reference TP/ED/26/0104 - Lenzie Academy in Whitegates Park, South Kirkintilloch
Attachments: PL154 _APPLICANT_RESPONSE_TO_EDC_FLOODING_OFFICER_FEEDBACK-1075947.pdf

For the attention of [redacted] and the relevant Planning Officers

Dear [redacted] and Respective Planning Officers

I formally object to the planning application referenced TP/ED/26/0104 on the basis that there is no workable drainage solution for the development making it impossible for the Council's Drainage Officer and SEPA, both statutory consultees, to approve the scheme. I also object on the basis that the Flood Risk Assessment has used the wrong catchment area, and has taken no cognisance of recorded water courses entering the existing conduit on which the entire development depends.

I list below the details on which my objection is based.

Yours sincerely

[redacted]

The Basis of the Objection.

I have just been presented with the latest Consultee Comments 27 March 2026 although there is a secondary date of 18/9/26 stamped on the document suggesting it has been resubmitted again in September 2026. Regardless, I would like to raise a formal objection against the Planning Proposals for the following reasons:

1. Currently, there if ferruginous water flowing into the ditch forming the south boundary of the site and this is prevented from contaminating the Bothlin burn, (and hence the River Kelvin which is protected waters) because the stone conduit running parallel with the erstwhile 'line' towards Garngaber is fully silted up. The reed bed area of the ditch (upstream of the conduit) deals with the contamination at the moment, but this area is to be replaced with a much narrower fast flowing ditch. What proposals have been provided to prevent this contamination reaching the Bothlin?
2. The stone conduit is fully silted up because it has either no hydraulic gradient, or a subliminal negative hydraulic gradient. These conduits were typically installed along with the adjacent erstwhile rail line to deal with run-off from the ballast supporting the rails. Some were used to accommodate services associated

with the rail. Whatever the function, these conduits were not laid to falls. Thus, for the entire development to rely on a drainage device with no hydraulic gradient is foolhardy.

3. You should be aware that there are at least two water courses entering this conduit that serve The Lenzie Moss. There appears to be other branches into this conduit, and one of the most important aspects of surveying (CCTV) culverted water courses is to identify inflows that have not been noted on plan records. It is unfathomable, therefore, that a £3-4million planning application should be commissioned when this vital part of the proposal has not been surveyed, and its viability confirmed. The capacity of the conduit cannot be determined since no levels have been taken. If it is to be replaced, the red line boundary will have to move and thus a new planning application may well be required.
4. If the conduit is replaced with a pipe with a positive hydraulic gradient, the invert level at the remote end is likely to be substantially lower than the existing connection point, and thus the extent of replacement is likely to continue all the way to the Bothlin Burn. I trust the new application will ensure the red line boundary extends that far.
5. Currently any rainfall that lands on the development site runs north and yet the development proposals have 26.4 l/sec greenfield release discharging into the southern ditch/burn. Consequently, this quantum of water is **wholly additive** to the existing water course and, therefore, it is expected that the regulatory authorities **(including SEPA)** will insist on the water course being modelled both upstream and downstream of the discharge point to ensure no existing issues are exacerbated by this additional flow. Therefore, the applicant's response to item 2 of the '*Response to additional comments by the Planning Case Officer*' (copy attached for ease of reference) is incorrect. A CAR license will be required and SEPA should be made aware that this additional discharge is wholly additive. **The aim of SuDS is to replicate the pre-development conditions as far as possible; these proposals do not meet the main principles of the SuDS Manual.**
6. As stated, there are at least two water courses linking with the conduit as it makes its way to the Bothlin burn, and these extend all the way to Lenzie Moss, yet the Flood Risk Assessment by Kaya Consulting does not include the Moss within the catchment area investigated. Surely this will need to be re-presented. I also believe Kaya have not included the flow from the new Aldi site within their original study.
7. The applicant's consultant asserts that the development site is a pluvial flood plain as distinct from a fluvial flood plain, however, until such time that the many water courses impacted by the development proposals have been modelled correctly, there is no way of confirming that the existing flooding evident within the park and within adjacent residential properties is pluvial or fluvial. SEPA have a holding objection for this very reason and again it beggars belief that the Council continue to expend substantial funds on this application with this likely 'deal breaker' unresolved. Note, I pointed this out to the Council more than 6 months ago and still this uncertainty exists.
8. The development proposals include adding close to 2.5m of additional imported soil over a large proportion of the site, resting on top of a 3-4m thick waterlogged peat bog. The 50kN/m^2 blanket loading over the entire area will result in significant uncontrolled and indeterminate settlement of the peat which will then expand again when intaking water. The development proposals make no mention of this inevitable movement which plays havoc with drainage and sewerage networks. How is this being reconciled? I am concerned that as a local resident, we will be paying for this white elephant of a development for the rest of our days.
9. The flood risk assessment identifies existing flooding over the low lying areas of the development site, and crucially, within the conterminous residential properties in Monkland and Woodside. When the ground levels are raised within the development site, the storage of the current flooding is removed, thus exacerbating the existing flooding within the adjacent properties. This needs to be resolved before planning permission is granted under current planning regulations. The exceedance plan has no mention of this vital requirement, and no indication of where the displaced flood water will be accommodated.
10. In relation to the proposed use of an existing basin, the SuDS Manual (C753) requires that the water table is at least 1m below the base of the basin. This is not the case here, and it must be questioned why the development is relying on existing apparatus that is non-compliant with the current regulations. That area of the site is constantly waterlogged so the calculations justifying the design of the basin will be interesting. Has this been checked by the drainage officer? **Are SEPA aware of this deviation from the SuDS Manual?**
11. The drainage officer suggests it would be helpful if the culvert, on which the vast majority of the surface water drainage depends, could be surveyed. The Council's own planning checklist for drainage submissions demands that any such receiving conduit **MUST BE SURVEYED BEFORE SUBMISSION** of a planning application Why was the application validated without this essential information? And 9 months after the

application was validated, it has still not been surveyed. Is this just incompetence, or is there something more sinister afoot?

12. Item 3 of the *'Response to additional comments by the Planning Case Officer'* refers to 30% of rainwater run-off entering an existing ditch to the north at the same location as a surface water sewer. The consultant's drawing states **"Location, Elevation, and Viability of Connection to be further investigated."** How can the planning authority allow this uncertainty within a planning application? If the connection is not viable, then what? Another planning application with alternative proposals. Why is the applicant not being told to remove all uncertainty from the proposals before the application is validated? This is what normally happens when the information submitted is insufficient; what is different in this case?
13. Item 4 of the '*Response to additional comments by the Planning Case Officer'* makes interesting reading and this entire scheme depends on the outcome of these additional surveys. It is for this reason that I question why the original submission was validated back in March 2026. The Council paid over £3million to a contractor to obtain planning permission. Their submission was substandard, and now we are being told that the contractor is being paid a further £1million to recover information that should have been part of the original contract. Who is sanctioning these ex-gratia payments?

I don't expect a response to these queries, but this objection has been copied to [redacted]. I think those responsible for expending substantial public funds should be accountable for their actions and I think the officers who are intent on justifying their ill considered decision to develop this site have a duty to explain their reasoning.

regards

[redacted]

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