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

Name: [redacted]
Address [redacted]

Comment Details

Commenter Type: Member of Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:I wish to object to this planning application on the grounds that it conflicts with the Development Plan and raises significant environmental, policy and public-interest concerns. While investment in educational infrastructure is important, the planning system requires that such development comply with adopted policy and be located on appropriate sites.

The proposal conflicts with multiple policies within the Development Plan, including NPF4 Policies 1, 3 and 7 and LDP2 Policy 13, which relate to biodiversity protection, brownfield prioritisation and the safeguarding of established public open space.

In this case the proposal would result in the permanent loss of protected public greenspace without demonstrating that reasonable alternatives have been properly explored.

Under Section 25 of the Town and Country Planning (Scotland) Act 1997, planning decisions must be made in accordance with the Development Plan unless material considerations indicate otherwise.

1. Conflict with National and Local Planning Policy

Whitegates Park is designated public open space forming part of the established Green Network. Development of this site would result in the irreversible loss of established greenspace that currently supports recreation, biodiversity and community wellbeing.

The proposal conflicts with several policies within National Planning Framework 4 (NPF4).

NPF4 Policy 1 - Tackling the Climate and Nature Crisis requires development to contribute positively to addressing climate and biodiversity challenges. Replacing permeable parkland with buildings, roads and extensive areas of hardstanding does not align with this objective.

NPF4 Policy 3 - Biodiversity requires development to protect and enhance nature networks. The ecological information submitted with the application acknowledges that woodland and wetland habitats on the site currently function as ecological corridors and that development will weaken this connectivity.

NPF4 Policy 7 - Brownfield First prioritises the re-use of previously developed land. The application does not demonstrate that brownfield or previously developed options, including redevelopment of the existing Lenzie Academy site, were fully and transparently assessed before selecting protected greenspace.

At the local level the proposal also conflicts with LDP2 Policy 13 (Protection of Open Space) and the Council's own Open Space Strategy. These policies require a high evidential threshold before established public greenspace can be lost, particularly where the space is actively used by the community.

The application attempts to frame the development as a choice between delivering a new school and protecting Whitegates Park. However planning policy requires that necessary infrastructure be delivered in ways that do not sacrifice protected environmental assets where reasonable alternatives exist.

2. Inadequate and Insufficient Site Selection

The application concludes that Whitegates Park represents the only viable site for a replacement Lenzie Academy. However the information provided indicates that only a limited number of sites were assessed and that no transparent comparative scoring or evaluation has been published.

The Planning Statement acknowledges that redevelopment of the existing school campus could technically be delivered through a phased or tandem construction approach. Similar approaches have been undertaken successfully elsewhere within East Dunbartonshire and across Scotland.

The reasons given for rejecting the existing site appear to relate primarily to programme length and construction disruption rather than to any fundamental physical constraint.

Construction disruption is a common and manageable aspect of major school estate projects and

does not in itself demonstrate that redevelopment of the current campus is unviable.

Given that the proposal would permanently remove an established public park, it is essential that all reasonable alternatives are rigorously assessed and transparently reported. The information submitted with the application does not demonstrate that this has occurred.

It is also notable that Whitegates Park was previously considered during earlier school estate feasibility work and was rejected due to ground conditions, access constraints and abnormal development costs. The current application does not clearly explain why those earlier conclusions have changed or what new evidence justifies the reconsideration of this constrained site.

Without a transparent and comprehensive site-selection process it cannot reasonably be concluded that development of protected greenspace represents the only feasible option.

3. Environmental Constraints and Ground Conditions

The technical reports submitted with the application confirm that the site contains several significant constraints including contaminated made ground, peat deposits and a high water table.

Ground investigations have identified contaminants including asbestos fibres, lead, nickel and polycyclic aromatic hydrocarbons within made ground soils. The remediation strategy appears to rely primarily on retaining contaminated material on site and managing potential exposure through capping and modelling assumptions.

While risk modelling can provide useful guidance, it inevitably relies on simplified assumptions about environmental conditions and human behaviour. In this case the site is also characterised by saturated ground conditions and drainage channels carrying water across the park.

These conditions raise legitimate questions about whether the interaction between contaminated soils, groundwater movement and surface water pathways has been fully assessed.

The investigations also identify peat deposits within parts of the site. Disturbance of peat soils can release stored carbon and contribute to greenhouse gas emissions, which is directly relevant to national planning policies concerning climate mitigation and soil protection.

Taken together, the contamination, peat and groundwater conditions represent significant engineering and environmental constraints which should be carefully considered when determining whether this location is appropriate for major educational infrastructure.

4. Hydrology and Surface Water Function of the Site

The Flood Risk Assessment and Drainage Strategy indicate that Whitegates Park currently performs an important hydrological function within the local drainage system.

The site lies at a relatively low level compared with surrounding streets and receives surface water runoff from nearby residential areas. Existing drainage mapping identifies water channels crossing the park which ultimately discharge into the wider catchment.

The proposed development would replace permeable parkland with buildings, roads and other impermeable surfaces. The drainage strategy relies heavily on engineered attenuation systems and controlled discharge mechanisms to manage surface water following development.

The modelling also indicates that during extreme rainfall events exceedance flows may move across parts of the development before entering existing drainage channels.

Taken together, these reports suggest that the park currently functions as a natural surface water storage and conveyance area within the wider catchment.

Replacing this permeable landscape with built development risks altering the existing drainage regime and potentially displacing surface water elsewhere. Without a fully developed flood risk strategy it is difficult for decision-makers or the public to evaluate whether equivalent drainage capacity and safe flow pathways can be maintained following development.

5. Ecological Impacts and Biodiversity Loss

Whitegates Park supports established habitats including woodland, scrub and wet ground which provide ecological value within the wider landscape.

The ecological information accompanying the application confirms that several trees on the site have potential to support bat roosts and that the park forms part of a wider ecological corridor linking habitats across the surrounding area.

The Ecological Impact Assessment acknowledges that development will reduce this connectivity and that some habitats cannot be recreated within the development boundary.

The proposed mitigation strategy relies partly on the creation of replacement habitat at a separate location at Myrtle Avenue. However this mitigation site currently exists only at concept stage and has not been secured through planning conditions or legal agreement.

Because the proposed mitigation is geographically separate and not yet committed through the planning process, it cannot presently be relied upon to offset the ecological losses associated with development of Whitegates Park.

National planning policy requires development to deliver measurable biodiversity enhancement rather than simply compensating for losses elsewhere. The current proposal does not clearly demonstrate that this requirement can be met.

6. Transport and Access Impacts

The Transport Assessment accompanying the application acknowledges that the surrounding road network already operates close to capacity during peak periods.

The modelling assumes that all pupil drop-off activity will occur within the designated on-site drop-off area. However the assessment itself recognises that significant numbers of parents may instead drop pupils on surrounding residential streets.

Estimates within the assessment suggest that well over one hundred vehicles may use nearby streets for drop-off activity. Despite this, the traffic modelling does not appear to assess the impact of this displaced traffic on surrounding roads such as Parkview Avenue, Monkland Avenue and Larkfield Road.

These residential streets already experience congestion at peak times and may not be able to accommodate additional school-related traffic safely.

In addition, the catchment area for Lenzie Academy extends well beyond the immediate locality, meaning that many journeys to the relocated school are likely to rely on the A806 corridor, which is already heavily used.

These factors suggest that the Transport Assessment may underestimate the real-world traffic and safety impacts of relocating the school to Whitegates Park.

Conclusion

Under Section 25 of the Town and Country Planning (Scotland) Act 1997, planning decisions must accord with the Development Plan unless material considerations indicate otherwise.

In this case the proposal conflicts with multiple national and local planning policies relating to

biodiversity protection, climate resilience and the safeguarding of established public open space.

The application also raises significant unresolved concerns regarding site selection, environmental constraints, hydrology, ecological impacts and transport effects.

Given the clear conflict with Development Plan policy and the unresolved environmental and infrastructure risks identified above, I respectfully request that the Planning Authority refuse this application.