Planning

From: [redacted]
Sent: 24 August 2026 13:56
To: [redacted]
Subject: TP/ED/26/0104 OBJECTION TO PLANNING APPLICATION

To: The Planning Authority, East Dunbartonshire Council
Planning Reference: TP/ED/26/0104
Proposal: Erection of a secondary school including road access, landscaping, car parking, sports pitches, recreational areas and associated development (New Lenzie Academy Build)
Site: Whitegates Park, Middlemuir Road, Lenzie, East Dunbartonshire

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1. Core Stance

I wish to register my **strong objection** to the proposed development at Whitegates Park. While the need for a modern facility to replace the existing Lenzie Academy is fully acknowledged, selecting Whitegates Park is **fundamentally flawed, non-compliant with planning policy, and introduces unmitigated risks** to public health, climate resilience, and community well-being.

Just as East Dunbartonshire's Council's Case Officer recommended an objection for the Cochno Road Battery Storage development (Application Number: ENQ/ED/2024/00009) due to its irreconcilable conflicts with the local soundscape, green belt context, and local landscape character, this application fails to meet the stringent criteria set out in the National Planning Framework 4 (NPF4) and the East Dunbartonshire Local Development Plan 2 (LDP2).

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2. Key Grounds for Objection

A. Severe Public Health Risks & Insufficient Contamination Remediation

- **Statutory Violations:** Policy 23 of NPF4 (Health and Safety) and Policy 23 of LDP2 (Safeguarding Infrastructure).
- **The Reality:** Historical site investigations confirm that Whitegates Park contains toxic contamination. Soil samples reveal **Lead at 1,400mg/kg** (over four times the safety threshold for school developments of 310mg/kg), alongside **Benzo(a)pyrene, Nickel, and Asbestos fibres**.
- **Flawed Mitigation:** The applicant's proposal to reuse contaminated soil on-site based on computerized risk models completely disregards real-world factors like children playing, heavy rain, and flooding. Disturbed toxic gases and heavy metals pose a major, decades-long threat to local residents, school staff, and future pupils.

B. Destruction of Deep Peat & Carbon Sink Loss

- **Statutory Violations:** NPF4 Policy 22 (Soils / Flood Risk) and LDP2 Policy 9 (Climate Change and Sustainability).

- **The Reality:** Site data confirms that Whitegates Park sits on a massive, naturalized peat bed measuring a minimum of **4.1m deep.**
- **Policy Breach:** NPF4 Policy 22 outlines a strict nationwide statutory presumption against the disturbance or excavation of deep peat. Piling through or digging up this land will trigger a substantial release of stored carbon dioxide (CO_2), rendering any claim of "Biodiversity Net Gain" (required under NPF4 Policy 3) mathematically impossible.

C. Irreversible Loss of Protected Open Green Space & Wildlife Corridors

- **Statutory Violations:** LDP2 Policy 4 (Community Facilities), Policy 17 (Natural Environment), and NPF4 Policy 3 & Policy 6.
- **The Reality:** Whitegates Park is a designated, highly valued neighbourhood park. It acts as a critical wildlife corridor and a biological sanctuary. Its mature trees have recently been granted a formal **Tree Preservation Order (TPO)**.
- **Policy Breach:** Over-developing this naturalized wetland ecosystem to create a fenced, locked campus directly creates an unlawful green space deficit in an area already underserved. The promise to provide "mitigation" years down the line by turning the vacated Myrtle Avenue site into green space is an inadequate, non-equivalent replacement.

D. Substantial Adverse Noise and Residential Amenity Impacts

- **Statutory Violations:** LDP2 Policy 10 (Design and Placemaking) and NPF4 Policy 14 (Design, Quality and Place).
- **The Reality:** The applicant's own Noise Impact Assessment acknowledges that outdoor sports pitch activities will **raise noise levels by up to 10dB** above evening background levels.
- **Flawed Modelling:** According to Sportscotland guidance, an increase of this scale constitutes a **substantial adverse impact**. The acoustic modelling relies on generic source levels and unrealistically assumes that only one rugby match and one football match occur simultaneously, failing to account for multi-pitch spectator and coach shouting.

E. Compounded Pluvial Flooding Risks

- **Statutory Violations:** LDP2 Policy 18 (Water Environment and Flood Risk) and NPF4 Policy 22.
- **The Reality:** An underground stream runs directly behind neighbouring properties (e.g., Larkfield road and potentially runs into the areas adjacent to woodside road and Douglas Avenue) down into the park's burn/ and or the bothlynn burn.
- **Policy Breach:** Whitegates Park serves as an essential natural soakaway zone. Replacing this natural water storage basin with extensive hardstanding, roofs, and car parks will aggressively exacerbate severe runoff and pluvial flooding risks for lower-lying residential homes on Woodside Avenue Douglas ave and Larkfield road.

F. Biased Site Selection & Flawed Consultation Foundation

- **Statutory Violations:** General Principles of Procedural Fairness and Democratic Transparency.
- **The Reality:** Freedom of Information (FOI) releases revealed internal Council emails from June–July 2024 confirming that a **phased tandem build on the existing Lenzie Academy site (Option 1) was entirely achievable and a lot cheaper.**

- **Policy Breach:** These viable design overlays were withheld from Councillors to push forward the choice of Whitegates Park. Because an entirely viable alternative site exists that avoids environmental destruction and public health risks, the statutory requirement to demonstrate a "critical locational need" to build over protected space cannot be met.

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3. Conclusion & Recommendation

Following the precedent set in East Dunbartonshire's assessment of complex infrastructure proposals, the critical disbenefits of this project clearly outweigh its principles.

The application represents a severe breach of environmental protections, endangers public safety through heavy metal disturbance, significantly dampens residential amenity via noise and flooding, and sacrifices irreplaceable community assets.

I also refer to the recent court case with councillor Higgins. Can I suggest that East Dunbartonshire council revisit this process, to provide full information to the councillors that were omitted in the initial proposal of the 11 sites.

I strongly urge East Dunbartonshire Council's Planning Authority to **reject this application in its entirety** and direct the project team to execute a policy-compliant, safer tandem rebuild on the existing Lenzie Academy campus.

I also request this is uploaded to the online planning application asap once its gdpr compliant

Thank you

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