Planning

From: [redacted]
Sent: 27 August 2026 21:12
To: Planning
Subject: Material objection - TP/ED/26/0104

Material Objection – Adequacy of CLEA Modelling and Human Health Risk Assessment

Dear Planning Officer,

I wish to raise a material planning **objection** concerning the adequacy and robustness of the Human Health Detailed Quantitative Risk Assessment (PL60), specifically the approach taken to the CLEA modelling and the inclusion of 17 and 18 year old pupils.

PL60 states "*The current Lenzie Academy does not have a sixth form with 17- and 18-year-old pupils, however in the case that a sixth form is accommodated later these values are considered suitably protective. As the CLEA model takes an average of the provided age classes, including 17- and 18-year-olds would result in a less protective overall value.*"

This statement raises a significant concern. The assessment expressly acknowledges that Lenzie Academy does not have a sixth form with 17- and 18-year-old pupils, yet those age groups have nevertheless been incorporated into the assessment on the basis of a hypothetical future scenario. More importantly, the assessment itself acknowledges that including those age groups results in a "less protective overall value."

I therefore object on the basis that the human health risk assessment does not appear to have been based solely on the actual and reasonably foreseeable receptor population for the proposed school, and that the methodology adopted may result in a less precautionary assessment of human health risk.

The Council should clarify:

1. What evidence exists that a sixth form accommodating 17- and 18-year-old pupils is proposed for Lenzie Academy.
2. Why hypothetical 17- and 18-year-old pupils were included when the assessment acknowledges that they do not currently attend the school.
3. Why a modelling approach that the assessment itself states produces a **"less protective overall value"** was considered appropriate for a school development.
4. Whether the CLEA modelling has been undertaken using only the age groups corresponding to the pupils actually expected to attend Lenzie Academy.
5. If such modelling has not been undertaken, why an assessment based on the actual anticipated pupil population has not been provided as a sensitivity assessment.
6. Whether the Council's Environmental Health/Contaminated Land officers have reviewed and accepted the use of the less protective value arising from the inclusion of hypothetical 17- and 18-year-old pupils.

This is particularly important because the proposed development would introduce a school onto land where contamination and human health exposure are material planning considerations. Scottish Government guidance confirms that contamination, whether confirmed or suspected, is a material

planning consideration and that planning should ensure land is suitable for its proposed new use. The Scottish Government's development management guidance also confirms that environmental impacts and the views of statutory consultees are capable of being material considerations in determining a planning application.

I therefore ask that the Planning Authority does not rely on PL60 without first being satisfied that the CLEA modelling appropriately represents the actual receptor population and provides a sufficiently precautionary assessment of human health risk.

In particular, the Planning Authority should require clarification of why the assessment has adopted a **less protective overall value** when that outcome results from including age groups which the assessment itself confirms do not currently attend the school.

Until this issue has been satisfactorily addressed, I consider that there remains an unresolved material concern regarding the adequacy of the human health risk assessment and whether the site has been demonstrated to be suitable for the proposed school

Kind regards

