

Date: 19th March 2026

To: The Planning Authority, East Dunbartonshire Council

[REDACTED]

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Park. This proposal is fundamentally flawed, non-compliant with Planning Policy and poses significant unmitigated risks to public health, climate resilience and community wellbeing.

contamination of the site, including

exists

Despite these extreme levels inadequate physical remediation is proposed. Contaminated soil will be reused on-site with risk downgraded to low via computer modelling that ignores real-world 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. 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 surface water runoff, reduces climate resilience and undermines national climate adaptation policy.

I have walked in Whitegates Park for many years and have observed standing water or flooding on the site regularly in wet weather.

It is also relevant that houses at the foot of Laurel and Hazel Avenues were seriously flooded some years ago

**Building a school on a contaminated flood prone site is reckless.**

## **3. 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, dog-walking, informal football and recreation.

Policy requires open space to be protected unless robust evidence demonstrates that alternatives have been fully assessed. No transparent site selection 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 White gates 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.

#### **4. 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 green space 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 well- provided. This exacerbates inequalities in access to greenspace.

#### **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 well-used greenspace that will be destroyed.

Relocating greenspace 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 plan-led 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, drop-offs 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 policy compliant locations. This undermines public trust in the planning process.

Council Officers' own emails (June-July 2024) released following FOI, admit the existing school site was feasible. 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 that 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 top Education"
- Councillors were denied a fair choice
- Overlay documents exist but were withheld
- The process was about defending the use of Whitegates Park and not objectively testing options.

## **9. Failure to Require Environmental Impact Assessment**

The Council's decision that an EIA was not required was flawed.

The new school is a major development on protected Greenspace involving contamination, flood risk, biodiversity loss and public health.

The absence of an EIA undermines transparency, objectivity and accountability.

## **10. Scale of the Proposed Buildings**

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

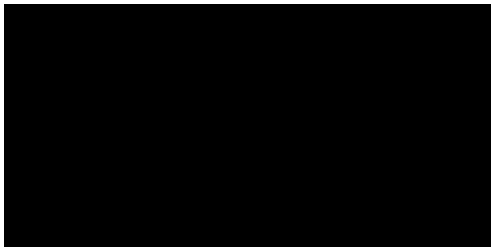
## **11. Noise Impact Assessment**

noise levels by up to 10dB above evening background levels, defined in Sport Scotland Guidance as a substantial adverse impact. The modelling also assumes only one rugby and one football match occurring simultaneously. It relies on generic source levels despite the report acknowledging that spectator and coach shouting are often dominant noise sources.

nearby residential properties.

and flooding

Council to pursue a policy-compliant solution on a suitable alternative site that does not sacrifice protected greenspace and endanger public health.



<sup>th</sup> March 2026