

I wish to formally object to Planning reference – TP/ED/26/0104

I have deep concerns about the proposal, the effect on human health and wellbeing, traffic and flooding risk

Non-Compliance with Environmental & Land-Use Policy

Whitegates Park is designated open space within the established Green Network and protected under LDP2 Policy 17 and the Open Space Strategy. The proposal results in irreversible loss of high-quality green space and biodiversity without adequate assessment or mitigation. It conflicts with NPF4 principles, which require prioritisation of brownfield land and protection of natural assets unless compelling evidence demonstrates no alternative. The park is heavily used for everyday recreation and plays a vital role in community wellbeing. No transparent evidence has been provided demonstrating that alternatives were properly assessed in line with policy obligations. This represents a fundamental breach of both local and national planning policy.

Inconsistency with the Council's Own Previous Findings

Whitegates Park was previously rejected during the ASN schools appraisal due to poor ground conditions, constrained access, abnormal costs, and inferior development platform. These concerns have not changed. The current proposal does not explain why earlier technical conclusions have been disregarded, creating serious inconsistencies in decision-making and undermining the credibility of the site-selection process, without explanation or updated technical evidence

Loss of Accessible Open Space

The land-take has increased by over 30% since early plans (52,053 m² → 68,800 m²) with no explanation. This materially intensifies the loss of publicly accessible greenspace. The replacement space is conceptual and years away from delivery. It cannot replicate the accessibility, ecological maturity, or social value of the existing park

Lack of Evidence that the Existing Site is Unviable

No spatial test has been conducted showing the current school site cannot accommodate the proposed building. The applicant relies on outdated feasibility drawings instead of the modern, more compact proposed design. This fails the evidential requirement in NPF4 and LDP2 to discount reasonable alternatives before protected greenspace can be developed

Flawed Transport Assessment

This acknowledges that significant numbers of pupils may be dropped off on surrounding residential streets, including the Middlemuir Road and Monkland Avenue areas. However, these streets and their junctions are not included within the traffic modelling. The assessment therefore fails to evaluate the traffic, safety and congestion impacts on residential roads that are predicted to experience school-related traffic.

Traffic modelling within the Transport Assessment appears to consider peak hour flows averaged across a longer time period. However, school drop-off traffic typically occurs in a much shorter and more concentrated time window. This may underestimate short-duration congestion and queue formation at site access points and nearby residential streets.

The Transport Assessment itself anticipates the need for traffic restrictions to deter drop-off activity on nearby residential streets such as Monkland Avenue and Woodside Avenue. This implicitly acknowledges that overspill drop-off traffic is likely to occur. However, the assessment does not

including Parkview Avenue and Middlemuir Road area. The junction modelling within the Transport Assessment focuses primarily on strategic junctions along the A806 corridor. However, the streets most likely to experience displacement drop-off traffic - including Larkfield Road, Parkview Avenue area, Middlemuir Road area, do not appear to have been assessed through junction capacity modelling. As a result, the potential effects of school traffic on the surrounding residential street network may not be fully understood. This is insufficient for a major development under NPF4 Policies 13, 15 and 21.

watercourse modifications have not been properly assessed. The Flood Risk Assessment acknowledges that the site is lower than surrounding land and receives surface water runoff from nearby areas, including parts of Monkland Avenue. The modelling also identifies areas of surface water ponding within the site. This indicates that Whitegates Park currently functions as part of the local surface water drainage system. Development of the site therefore risks displacing surface water storage and altering existing drainage patterns.

displace floodwater elsewhere if those storage functions are altered. The Drainage Strategy confirms that infiltration drainage is not feasible due to the presence of saturated peat and made ground across the site. Taken together, these reports suggest that Whitegates Park currently functions as a natural surface water storage and conveyance area within the wider catchment. The replacement of permeable parkland with buildings, roads and hardstanding therefore raises legitimate questions about whether the site's existing hydrological role has been fully recognised and whether equivalent surface water storage and routing capacity can be maintained following development. Without a final Flood Risk Assessment, neither the public nor decision-makers can evaluate impacts on neighbouring properties or safe access.

