



prior to the rebuilding of all other secondary schools in the authority area one of the oldest, but is now last departure from East Dunbartonshire Council Local Development Plan 2 2022 (LDP2) which presumes recreation and sports facility (formal football pitch). The proposed change of use of the site is a significant

Whangarei Park (WHP) is proposed site which park design as a regular basis for my wellbeing and recreation community given the same consideration as other secondary schools should be ashamed.

to be considered for improvement is a disgrace and those responsible for this failure to ensure LA was

The fact that Lenzie Academy (LA) is now the oldest secondary school in East Dunbartonshire and was

against the development of the site and this proposal unless there are material considerations justifying such a significant departure.

Contamination lies beneath the surface of WP, within the knowledge and consent of past and present Local Authorities, due to the site's industrial past and as I understand it the relocation of spoils from the construction of the now completed A806 (Initiative Road).

My own research has informed me the contamination poses no threat to me or anyone else that has used or currently uses the park if the current surface remains undisturbed. However, I believe investigations are required to confirm that the underground contamination has not leaked into the watercourses on the site and in consequence the outfalls from the site and watercourse outside the site. Evidence of such investigation is not apparent to me in the proposal plans and supporting documents.

The applicant acknowledges the proposal site is a known flood risk area, that significant Peat lies beneath most of the ground which forms the surface of the park and there is a high water table. My own research informs me that when the high water table is added to the equation it creates ground conditions that make the site extremely unstable and not suitable to build on. I have read nothing in the applicant's plans and supporting documents that reassures me that measures proposed will reverse this risk. The precautionary principle clearly applies in this case i.e. long term safety over risk of irreversible impact.

I am aware a report assessing the proposal will be prepared by the Planning Case Officer (PCO), outlining what are considered by the PCO to be all the material considerations applicable to the proposal, for presentation with recommendations and possibly planning conditions to the Planning Committee (PC) at a future date.

A great deal of commentary is provided by the applicant in this proposal in relation to the site selection process and the arrival at the proposal site as the preferred option. In consequence the site selection process and all related documents and records are material considerations in this proposal. Having considered the publicly available material and documents obtained as a result of information requests I question the appropriateness and robustness of that process and in consequence object to the selection of the proposal site as the only viable option for a new LA

There are a number of documents which relate to planning and fairly and reasonably refer to this proposal but which are not referred to in or submitted with the applicant's proposal.

I am surprised by this as these documents are held by the council and are material considerations in this proposal e.g. Mason and Evans 2018 ground investigation report, 2018 Baker and Hicks feasibility study and Addendum, 2018 Ecology survey Whitegates Park, 2018 site options comparison between Whitegates Park and Waterside Playing Field and East Dunbartonshire Council Planning Service site option appraisal 2021.

I sincerely hope that the Planning Case Officer's report will include commentary on the information contained in the forgoing documents so that, prior to considering the proposal, members of the PC are apprised of all material considerations affecting the proposal.

I have read and considered the applicant's plans, supporting documents, comments of internal/external consultees and representations that are publically available or I have obtained via information requests.

I am concerned about the inconsistencies and inaccuracies contained within the applicant's plans and supporting documents, documents of those commissioned by the applicant and other parties commissioned by those commissioned by the applicant.

I will refer to these plans and supporting documents later in my objection but again I sincerely hope that the PCO report will correct these multiple Inconsistencies and inaccuracies that significantly impact the material considerations affecting the proposal and where necessary require the re-submission of those plans and documents.

It is also a concern that despite multiple and extensive pre application consultations and recommendations that many of the applicant's plans and supporting documents have been found inadequate to support the proposal, by internal and external consultees.

I will refer to these plans and supporting documents later in my objection to demonstrate, contrary to the claims of the applicant those commissioned by the applicant and those commissioned by those commissioned by the applicant, that mitigation is provided by the applicant that justify this significant departure from LDP2

As previously rehearsed I am aware that a PCO report and recommendations will be presented to the PC in the future outlining what will be stated to be the material considerations applicable to this proposal.

I am also aware that should the PC be minded to consent to the proposal, identification of all the material considerations presented to them that they believe justify such a significant departure from LDP2 are required to be identified and formally recorded.

Several references are made in the proposal supporting documents to an inferred replacement park on the current site of Lenzie Academy (LA) at Myrtle Avenue (MA) suggesting a replacement park will be located there.

I object to the inclusion of or any reference to this inferred park in the assessment of this proposal. No formal application has been made or subjected to the Development Management Process (DMP) and therefore any reference to it undermines the entire DMP.

In consequence it cannot be claimed that the inferred park is fairly or reasonably related to this proposal and therefore is not a material consideration. My view is supported by the comments from the councils Sustainability Officer (s) in their consultation response

“it can only be determined that the proposed mitigation site at Myrtle Avenue is a *'suitable replacement'* of open space through a full review of that separate application”

It's unfortunate that a number of consultees have either not responded with comments about the proposal or their comments haven't been made publically available prior to the cut off for representations, as these can be particularly helpful to those concerned about a proposal.

I reserve the right, should the representation period not be extended, due to not all relevant information being publically available, beyond the current 5pm 30/4/26 cut off, to submit further representation should new or amended information be submitted in relation to the proposal by the applicant, applicants agents, those commissioned by the applicant and those commissioned by those commissioned by the applicant or anyone else.

## Amenity objections

No consultee response has been made publically available in relation to the applicants **Transport Assessment** (PL45) at the time of my submission therefore their response to the applicants plans and supporting documents and compliance with in particular NPF4 policy 27 , LDP2 Policy 13 , Transport Scotland's Transport Assessment Guidance ,and National Roads Development Guide is unknown to me . However my own research suggests that the proposal does not comply with the aforementioned.

The assessment is based on a survey commencing on Tuesday 22 April 2025 for one week. I question the selection of this week for the survey as I would have thought a more accurate reflection of the traffic impact at the current school site would be the week in August when the new school year commences.

I am concerned that the authors of the assessment did not take up the council's offer of more recent road data concerning the streets surrounding the current school site and the proposed new site.

Commentary is provided (paragraph 6.6 page 66) informing that two committed developments in close proximity to the proposal site have been included in 2028 modelling scenario(s);

Retail Food Store on land adjacent to Woodilee Road TP/ED/21/0465

Care Home on land adjacent to Woodilee Road TP/ED/22/0777

However, no explanation is provided for the exclusion of TP/ED/20/0677, Proposed development of 12,000 sq.ft. Office accommodation, together with the provision of 6 No. residential units for respite care linked to third sector and charity organisations to support people with disabilities. This development has also been committed to and is closer to the proposal site than the two other developments. Furthermore I believe it is extremely ambitious to have used 2028 for the modelling, 2030 would be more realistic.

The assessment document contains a lot of information that is factually incorrect, examples of which follow. I believe this information distorts the outcomes of the modelling used, the conclusions reached and accordance with the aforementioned policy and compliance documents;

1.1.3 + 2.1.2 +7.1.3: Whitegates Park is 650m from the existing school

1.1.6 +7.4.1: Vehicular access to the new school would be located 230m to the north of the A806 Initiative Road /McGavigan's Road roundabout

2.9.1+ 7.2.1: public bus services 400m form the proposed school

7.2.1 All of the Academy catchment area is within a 30-minute walk of the proposed site

Paragraph 1.2.3 of the assessment outlines a number of off-site measures which the applicant claims support the proposal. It is not clear from the raft of documents submitted by the applicant how these measures will be funded, whether they require to be added to the cost of the proposal or if they are achievable e.g. a new Toucan crossing on Woodilee Road (Fig 34 page 59) does not consider 3 new houses, now completed, at this location which will conflict with this measure. The applicant acknowledges that off-site measures are necessary to support their conclusions but also alludes that the processes required to determine if the off-site measures will be implemented or are achievable will not be transparent to the public which I believe is unreasonable.

Traffic restrictions to deter drop-off /pick up traffic from unsuitable areas are proposed, such as Monkland Avenue, and Woodside Avenue.

The assessment ignores the other access lane from Monkland Avenue to the Strathkelvin Railway Path , the displacement to other areas that will occur as a consequence of these measures if implemented and the ineffectiveness of signs stating no entry except for access ,no access to where?

The assessment asserts (paragraph 2.2.2) the key roads in the study area in relation to traffic impact are A806 Initiative Road, B757 corridor, and Garngaber Avenue, I don't disagree with the inclusion of these.

I am however concerned that Lindsaybeg Road and its multiple junctions, Eastergarngaber Road and its multiple junctions and Woodilee Road and its multiple junctions have not been considered key roads for access to the proposed school for pupils arriving by car, in particular from the south .I believe this is a significant error in the assessment.

The assessment ignores the impact the proposal will have on this route which includes the main pedestrian access to Millersneuk Primary School and the main drop/off and pick/up location for pupils at that school and already a source of significant congestion at peak times.

I would suggest the aforementioned roads and junctions are the key roads with regard to pupils arriving at the proposed new school by vehicle from the south and not the routes suggested in the assessment i.e. M80 /A806 or M80 /Lenzie Road/Kirkintilloch Road/Garngaber Avenue/Woodilee Road.

The assessment suggests that drivers will ignore the Lindsaybeg Road route(s) in order to access Initiative Road, I disagree. In my opinion drivers will use the most direct route.

The assessment acknowledges that with the proposed school in place a critical junction in the road network A806 Initiative Road / Menzies Drive / Woodilee Road junction will exceed capacity during peak times but this would be short lived .I find it unacceptable and unreasonable to suggest that for 3 hours every week day when the school is operational the saturation of this major junction is acceptable.

The assessment acknowledges there is no coherent cycle network along which children could cycle to school. Schoolchildren would still need to cycle along roads or footpaths to access the Strathkelvin Railway Path and the proposed Academy site. Therefore the applicant's claim that children will be encouraged to cycle to school is fanciful coupled with the fact that of almost 1400 pupils 8 cycle to school.

The assessment identifies the key pedestrian routes that will be used for the purposes of the school due to the relocation of it to WP Strathkelvin Railway Path (SRP), Middlemuir Avenue, a new public path to the south of the school building and a diverted path from the SRP to Parkview court. By virtue of the Land Reform Scotland Act 2003 6 (b) (iii) access rights to these paths would be denied to the public and in consequence I object to the proposal.

I think it is reasonable to conclude that a school is a significant travel generating use and that the proposal site is currently accessed on foot and by modes of transport which do not involve the use of cars and in consequence has little impact on the surrounding road network.

LDP2 Policy 11 outlines 3 criteria A-C where development proposals that generate significant travel-generating uses will not be supported if any one of the criteria applies to a proposal:

- A. There are no immediate links to walking or cycle networks or where links cannot be easily delivered
- B. There is no access to public transport within a 400m walk via well-lit, safe and all- weather routes that have been designed for all users
- C. There would be clear reliance on access by private car

With regard to criteria A the assessment states “There is no coherent cycle network along which children could cycle to school. School Children would still need to cycle along roads or footpaths to access the Strathkelvin Railway Path and the proposed Academy site.” Links to walking networks have been found wanting in terms of safety and there is no guarantee the required safety measures can or will be implemented.

With regard to criteria B, despite the applicants claim to the contrary, there is no access to public transport within a 400m walk via well-lit, safe and all- weather routes that have been designed for all users of the proposed school

With regard to criteria C, 83% of staff drive to the current school the assessment claims this will remain the same should the school be relocated therefore in my opinion it would be disingenuous to suggest there won't be a reliance on the use of a car .

The information contained within the applicants **Noise Impact Assessment** (PL46) has been found to be inadequate (TP\_ED\_26\_0104-EDC\_ENVIRONMENTAL\_HEALTH\_CONSULTATION\_RESPONSE-1034557) in support of the proposal and the Environmental health team appear to have issued a holding objection due to lack of information and the need for clarity

In light of the foregoing I object to the proposal due to the impact on the residential amenity of the properties surrounding the proposal site from unacceptable levels of noise.

The information contained within the applicants **Lighting Impact Assessment** (PL47) has been found to be inadequate (TP\_ED\_26\_0104-EDC\_ENVIRONMENTAL\_HEALTH\_CONSULTATION\_RESPONSE-1034557) in support of the proposal and the Environmental health team appear to have issued a holding objection due to lack of information and the need for clarity

In addition to the Environmental Team response I believe that the assessment categories WP in the wrong environmental zone (3) it's clearly zone 2, outer urban and an area of low district brightness. The document acknowledges the Kirkintilloch Leisure centre as a prominent light source in close proximity to the proposal yet the cumulative impact of the addition of the proposal is not assessed.

The assessment acknowledges Sports lighting is the largest source of obtrusive light. As highlighted in the aforementioned consultation response the impact of the sports lighting is based on the lighting sited at the wrong height for each pitch, casting doubt on the conclusions and recommendations of the assessment.

In light of the foregoing I object to the proposal due to the impact on the residential amenity of the properties surrounding the proposal site from unacceptable levels of nuisance glare , light spillage and the impact on wildlife ,if any remain ,should this proposal be consented to and their habitat completely destroyed.

## **Design and access objections**

The school roll for LA is a material consideration in this proposal as it is referred to and relied on throughout the proposal to justify the size and scale of the proposed development at WP.

The school roll of LA is artificially inflated due to the failure overtime to control placing requests for the school, from within East Dunbartonshire but outside the catchment area and from outside East Dunbartonshire. It is a matter of public record that almost half of the pupils attending LA, are as a result of placing requests.

I have no issue with parents or carers exercising their right to make a placing request for a school of their choice but believe that almost half the school role resulting from placing requests is unacceptable and undermines the need for catchment areas.

The failure to maintain placing requests at a reasonable level does not justify building a school that is 33% larger than it needs to be in order to accommodate children from within a catchment area.

It is a matter of public record that the projected School roll at LA is set to drop considerably by 2027-28 and that there is an opportunity to re balance the overprovision of placing request at the school whilst still making provision for a reasonable percentage of placing request and provide a school of an appropriate size and scale for the catchment area.

I object to the proposal as the school being proposed is not designed to accommodate the needs of children within the catchment area but rather the needs of those wishing to make placing requests.

I object to the scale and massing of the school building as it does not ensure a positive impact on the character, function, identity and amenity of the surrounding area, including compatibility with existing uses, Help to reduce use of the car by prioritising pedestrians, cyclists and public transport services nor protect, mitigate and enhance the natural and water environment or protect, enhance, expand, manage or create green infrastructure and the green network.

The applicant suggests that replacing the current vista of tree lined protected trees adjacent to Initiative Road ,Part of the Gateway between Lenzie and Kirkintilloch with a four storey mass is justified due to the nearby development(s) of low rise educational and business premises which have been sympathetically designed to blend in with the amenity of the surrounding area. The images submitted by the applicant to demonstrate the impact of the proposal on the surrounding area is amateurish at best.

Consultee comment from Police Scotland has not been made publically available prior to the cut off period for representation therefore their response to the applicants plans and supporting documents and compliance with national and local policy is unknown to me

I am concerned about the lack of natural surveillance on a large section of both the Strathkelvin Railway Path and the proposed diverted public right of way between Parkview Court and the school and the proposed new path south of the school all of which are intended as major pupil and staff routes to the school. I can find no safety assessment within the applicants submissions in relation to the footpaths intended for use by 800 children.

The proposal intends a south pathway through the school grounds that appears to be contrary to legislation prohibiting such access.

The position of the intimate seating in the highest footfall area and adjacent to car parking is inappropriate.

The position of the quiet garden area next to plant machinery and a service road is inappropriate.

The Consultee comment from Sports Scotland (SS) has found the information regarding the sports pitches to be inadequate (TP\_ED\_26\_0104-SPORTSCOTLAND\_CONSULTATION\_RESPONSE-1036299) and clarity is sought in relation to a number of concerns about the plans submitted relating to the pitches. SS appear to have issued a holding objection subject to clarification, the provision of the information sought in relation to areas that the proposal does not currently comply with and a standard planning condition. Surprisingly the SS response seems to conflict with their own data sheets (10 and 13) obtainable from their web portal in respect of dimensions for Football and Rugby pitches. SS have lowered their standards outlined in the aforementioned data sheets for this proposal, which is a concern. However this reduction in dimensions also has positive implications for the potential for a tandem build on the MA site.

I disagree with the comment that as a result of the proposed pitches there will be in compliance with NPF4 policy 21, increased capacity, as these pitches merely maintain the status quo due to the loss of the two pitches at MA. Alluded to in the SS response

I believe accepting the applicant's inference of the loss of the grass pitch at WP being mitigated by a suggestion of a replacement at MA is unreasonable as the inference of a replacement park at MA is not a material consideration in this application. A view alluded to in the SS response.

It is therefore reasonable to conclude that at present the proposal does not accord with the provisions of NPF4 policy 21 and LDP2 Policy 13 and I object to the proposal on that basis.

The pitches proposal has also been found to contain insufficient information required in the councils Environmental Health consultation response which also appears to be a holding objection subject to the provision of further information and clarity (TP\_ED\_26\_0104EDC\_ENVIRONMENTAL\_HEALTH\_CONSULTATION\_RESPONSE-1034557) surprisingly the SS does not appear to consider these inadequacies in its response.

### **Access objections**

The proposed access to the site has changed significantly since the applicant's public events in June and October 2025. Access is now proposed directly from Initiative Road (A806) a regional distributor road via a signalised junction. Such an access is usually regarded as unacceptable unless justified. I can find no justification for this inappropriate access within the applicant's plans or supporting documents and therefore object to the proposed access.

The applicant claims to have complied with the EDC standards in respect of parking provision, I disagree. The provision assumes that only 83% of staff will continue to travel to the school by car and that no pupils are able to drive themselves to the school. There is no flexibility should there be a change in attitude from staff who currently don't drive to the school due to its re location at the urban edge of ward 6 and claiming that the residual from the staff required provision of 17 spaces is sufficient for visitors for a school of this size is conservative to say the least. I therefore object to the proposal due to lack of sufficient parking provision.

The proposal informs that as a consequence of the relocation of the school that the part of the Strathkelvin Railway Path (SRP) between Lenzie Road and Woodilee Road, a diverted public right of way, a new path to the south of the school and the access to the SRP from Middlemuir Avenue will be used for the purpose of the school as footway access. The proposal seems to have overlooked the impact of this in terms of the Land reform (Scotland) Act 2003 6(b)(iii) (LR(S) A) "Land over which access rights not exercisable" "consists of land contiguous to and used for the purposes of a school". The proposal would deny the public access to these long standing rights of way and core path connections. The access officer does not refer to this impact in his consultation response but does refer to the impact of the LR(S) A on the school grounds which conflicts with the intention to provide public access through the school grounds to Initiative Road (EDC\_ACCESS\_OFFICER\_CONSULTATION\_RESPONSE-1030464)

I therefore object to the proposal due to its impact on public rights of way and core paths.

### **Environmental objections**

The Open Space Strategy 2017-2022 (OSS), the Open Space Audit 2020 (OSA) and the Play sufficiency Assessment 2025- 2030 (PSA) are the current East Dunbartonshire Council reference documents in relation to open space, community facilities and play space. Both NPF4 and LDP2 refer to decisions in relation to open space, community facilities and play space requiring to be informed by the aforementioned policy documents. In its current condition the WP site meets all the requirements of access and quality outlined in the aforementioned documents.

As recently as 2022 (the proposal Site) WP was included in LDP2, identified as only one of two neighbourhood public parks in Lenzie (WP being the much larger), designated open space and a community sports and recreation facility (formal football pitch).

WP accords with National Planning Framework 4 as it encourages, promotes and facilitates spaces and opportunities for play, recreation and sport and in consequence the natural and built environments are improved, more equitable access to opportunities for play and recreation are provided and physical and mental health are improved through provision of, and access to this open space and outdoor recreation, play and sport facility.

Whilst I appreciate every planning proposal must be treated on its own merits I believe the planning Authority needs to be consistent in its application of policy. The following are examples where the Planning Authority for this proposal has resisted proposals that would have resulted in the loss of undesignated useable open space, TP/ED/22/0684, TP/ED/25/0004 and TP/ED/24/0497, the latter was also dismissed on appeal by the Department of Planning and Environmental Appeals. All the examples clearly support the refusal of this proposal if policy is applied consistently.

It is currently estimated that this proposal will not be delivered until 2030. Add an additional 2 years for the existing LA to be demolished and an inferred replacement park to be developed (2032) and 30 years for the inferred park to reach the same standard as WP (2062). I believe it is unreasonable for the applicant to suggest such an inferred park is suitable mitigation for the loss of a substantial, easily accessible, quality and established policy protected Neighbourhood Park and recreational facility.

The applicant provides commentary (PL69 page 64) informing they obtained information via pre application consultation that the current deficit of Public Park and Garden Open space in Lenzie is currently 2.41ha, that the amount of Public Park and Garden Open space required in Lenzie is 16.18ha and

the current amount is 13.77ha .Subtracting the current amount from the required amount equalling the 2.41ha deficit.

It is also stated as a consequence of the loss of WP the deficit will increase to 7.9ha.

I assume this figure is arrived at by adding the area of WP 6.19ha(PL01) to the existing deficit 2.41ha (page 64,PL69) and subtracting that from the amount of Public Park and Garden Open space required in Lenzie 16.18ha (page 64, PL69).

However to arrive at 7.9ha the area of WP would have to be 5.49ha (suggested new deficit 7.9ha minus existing deficit equalling the area of WP) and not 6.19ha as stated in (PL01) if the 5.49ha figure is correct the deficit is greater than7.9ha, it is 8.59ha.

A great deal of commentary is provided by the applicant relating to a replacement park at MA, which it is stated is 3.987ha (PL69). Even taking this into consideration as mitigation would result in a deficit of either 3.9ha or 4.6ha of required Public Park and Garden Open space in Lenzie which will not be replaced; therefore in my opinion the inferred replacement park does not provide mitigation for the loss of WP.

The applicant provides commentary (PL69 page 74) acknowledging that proposals resulting in the loss or reduction of usable open space will be resisted (LDP2 policy 13) unless one of any of the four mitigating criteria (A-D) applies to the proposal.

Only mitigation criteria (A) are relied on by the applicant to accord with this policy;

“Permits loss if suitable replacement and enhanced facilities are provided in a location that is convenient and accessible for users”

I believe it is reasonable to conclude ,due to their being no reference to criteria B ,C and D that the applicant accepts there is no clear excess of provision of open space to meet current and anticipated demand in the local area , criterion (B) , that in relation to the outdoor sports facility (formal football pitch) the proposed development is not ancillary to the principal use of the site as an outdoor sports facility; or the proposed development does not involve only a minor part of the outdoor sports facility and would not affect its use and potential for sport and training; and that the site would not be developed without detriment to the overall quality of provision , criterion (C) and the proposal site is not undesignated open space , criterion (D), leaving criteria (A).

The applicant asserts that the proposal accords with LDP2 Policy13 criteria (A) with reference to an inferred proposal for a replacement park at MA, which has not yet been submitted or subjected to the DMP.

As previously rehearsed in my opinion all reference to this inferred Park in relation to mitigation for the loss of WP cannot be considered for the reasons I have previously outlined.

My view is supported by the applicants “Sustainability Team” in their response to a request for comment “it can only be determined that the proposed mitigation site at Myrtle Avenue is a *‘suitable replacement’* of open space through a full review of that separate application”

The recommendations in the East Dunbartonshire Council Open Space Audit 2020 were adopted by the council whereupon the access standard, for access to a Neighbourhood Park ,became a 10 minute walk or

a distance of 480 metres (OSA page 22 table 7). WP is well within that standard from my home (approximately 400m). The inferred park at MA will be significantly outwith these parameters (approximately 1,400m). Therefore an inferred park at MA would not be a suitable replacement provided in a location that is convenient and accessible for me and I suspect many other users of Whitegates Park.

The comments of the councils Greenspace and Biodiversity Officer have not been made publically available therefore their response to the applicant's plans and supporting documents and compliance with national and local policy is unknown

However, the applicant relies on NPF4 Policy 3: Biodiversity claiming enhanced facilities will be provided at WP and MA to accord with this policy and criteria A of LDP2 Policy 13. As previously rehearsed the MA inferred park has to be disregarded for the reasons I outlined previously and the parts of the WP proposals that are not publically accessible must also be disregarded.

The applicant acknowledges there would be significant residual effects as a consequence of development of the WP and their own Ecological Impact Assessment (PL50) confirms neither the proposal nor inferred park individually or cumulatively achieves the significant biodiversity enhancement required for the loss of WP.

The Scottish Government's Control of Woodland Removal Policy includes a presumption in favour of protecting woodland from built development and sets out criteria for determining the acceptability of woodland removal "Removal will only be permitted where it would achieve significant and clearly defined additional public benefits".

The public benefit claimed by the applicant is the provision of essential infrastructure and a new school. I dispute this claim as this essential infrastructure already exists and an improved school can be provided elsewhere without the loss of a valued neighbourhood park.

As previously rehearsed, reliance is placed on an inferred park for compensatory replanting and the no net loss of biodiversity requirement. It is disingenuous of the Arboricultural Impact Assessment (PL70) to rely on the inferred park as mitigation for the reasons I have previously outlined.

The Arboricultural Impact Assessment has been found to be inadequate to support the proposal i.e. insufficient information relating to loss of open space and loss of trees from a flood attenuation and carbon sequestration perspective.

All trees in WP are now temporarily covered by Tree Preservation Order - Whitegates Park, Lenzie (No.1 2026). A decision to confirm the Tree Preservation Order is due in September 2026. I am in no doubt that the council will confirm the Tree preservation Order due to the council's assessment of the trees and their significant landscape value;

"The Council is of the opinion that the protected trees make a positive contribution to the surrounding area in terms of visual amenity, biodiversity and landscape value. The majority of trees are in good condition and exhibit considerable life expectancy. The trees contribute substantially to the character and visual appeal of the local area, providing clear public benefit. On that basis, the Council is of the opinion that in accordance with s160 (1A)(a) that it is expedient in the interests of amenity to make the Order "

The applicant relies on NPF4 Policy 6: Forestry, Woodland and Trees to justify the proposal and the removal of a significant number of protected trees including the majority identified in the Arboricultural

Impact Assessment (PL70) as the most valuable (TG8) and regarded as category A woodland by the assessment.

Reliance is again placed on mitigation provided by the inference of a replacement park at MA which for reasons previously rehearsed I believe are not a material consideration in this proposal.

Should this proposal be consented to by the Planning Committee the applicant has the ability to cut down these valuable trees in order to make way, in the main, for plastic sports pitches. In my opinion it's a national disgrace that Tree Preservation Orders can be manipulated in this way, by Councils. If the applicants for this proposal were other than the council the proposal would be refused on the basis of protected trees alone.

The applicant provides commentary (PL69 page 74) acknowledging that proposals resulting in the loss or reduction of outdoor sports and recreation facilities will be resisted unless one of any of the four mitigating criteria (A-D) applies to the proposal (LDP2 policy 13).

The applicant outlines a summary of the Pre application comments of the council's internal consultees in relation to "Sports and play facilities" (PL69).

It is represented by the applicant that those representing the council believe the pitch at WP is informal, which is a concern. However, replacing a formal pitch with an informal one does not accord with NPF4 Policy 21 or LDP2 Policy 13.

I dispute the applicants claim that the grass football pitch at WP is informal, it is maintained by the council, is bookable, has changing facilities, has permanent goals and accords with Sports Scotland data sheet 10.

It is unreasonable for the applicant to claim that the pitch at WP will be replaced as a result of the inferred park at MA for reasons I have already outlined.

It is disingenuous of the applicant to claim there will be no reduction in the overall playing capacity in the area as a result of the proposal and that relocating the WP pitch over a mile away results in that location qualifying as an equally convenient location for users. The applicant provides no such evidence that this is the case and merely subjectively speculates that it will be.

I don't dispute that it will be suggested the proposed pitches are available for let but dispute, as a result of information released to me by the council demonstrating the number of times the current LA pitches are available to the public, that the proposed pitches will be available to the public, as has happened, despite assurances from the council, at the Woodland View ANS school.

The applicant again relies on criteria A of LDP2 policy 13 to justify the loss of the formal football pitch at WP. "Suitable replacement and enhanced facilities are provided in a location that is convenient and accessible for users" and "off-site mitigation measures from an open space perspective "at the MA.

As previously rehearsed I believe it is unreasonable for the applicant to claim that the inferred park provides a suitable replacement for the reasons I have previously outlined.

In relation to NPF4 policy 3 I disagree with the applicant's claim that a full understanding of the existing characteristics of the site has been established or that it has been demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks.

The applicant's own Ecological Impact Assessment PL 50 confirms the proposal does not deliver the significant biodiversity enhancement required but the applicant dismisses this as insignificant.

The applicant states that "Habitat loss is expected" as a result of the proposal. What the applicant doesn't say is the existing habitat is to be wiped out as a result of the proposal and alludes that the onsite and inferred off site replacement will take 30 years to reach the equivalent level of the existing WP site and some will never be replicated and In addition the proposed WP mitigation will not be accessible to the general public.

The information contained within the applicants **Flooding Risk Assessment** (PL71) and associated supporting documents have been found to be inadequate (SEPA\_CONSULTATION\_RESPONSE-1030282 and EDC\_FLOODING\_OFFICER\_CONSULTATION\_RESPONSE-1030469) in support of the proposal.

The further information requested by the aforementioned consultees has not been made publically available therefore I can only conclude it has not been provided. SEPA have issued a holding objection which also appears to be the position of the Council Flooding officer.

In consequence I object to the proposal due to the risk of flooding to the site and surrounding properties.

With regard to the drainage strategy I am not reassured by the applicants drainage proposals that they mitigate for flooding and I am concerned that the council's Drainage Officer, bearing in mind the site is in a flood risk area and the vulnerable nature of the proposal, didn't think it prudent to visit the site or wait until clarification is received in response to the question(s) posed before offering no objection. I suspect the response is a holding objection rather than no objection.

The applicant's Ecology Impact Assessment in (PL50 page 51) outlines the ecological devastation that will occur at WP even with the mitigation measures in place.

The assessment also relies on the inferred park at MA to justify the destruction of the ecology at WP despite the author alluding to it being insufficient to mitigate for the loss. It is disingenuous to suggest that a 30 year timeframe mitigates for the loss of an already established ecosystem that, unlike the inferred park, does not fragment nature networks, wildlife corridors and habitat nodes.

### **Additional objection**

The town centres and regeneration Team have responded with what appears to be a holding objection pending additional information. That aside I wholeheartedly disagree with the contents of this response in particular the impact of the proposal on the businesses surrounding the current school and the suggestions that school children descending en masse on Kirkintilloch Town centre is a good thing and does not expose them to considerable risk.

No assessment of the economic impact on the Small to medium enterprises that rely on the location of the existing LA to survive. I object to the proposal due to the impact relocating LA to WP will have on local businesses and employment.

For the reasons outlined in my representation I object to the proposal as it doesn't accord with;

National Planning Framework 4 Policy 1: Tackling the Climate and Nature Crises Policy 2: Climate Mitigation and Adaptation , Policy 3: Biodiversity , Policy 4: Natural Places , Policy 5: Soils, Policy 6:

Forestry, Woodland and Trees , Policy 7: Historic Assets and Places , Policy 12: Zero Waste , Policy 13:Sustainable Transport , Policy 14: Design, Quality and Place , Policy 18:Infrastructure First Policy 20: Blue and Green Infrastructure , Policy 21: Play, Recreation and Sport , Policy 22: Flood Risk and Water Management and Policy 23: Health and Safety and Policy 25: Community Wealth Building

East Dunbartonshire Local Plan 2 2022 Policy 1: The East Dunbartonshire Development Strategy Policy [4.CF](#) Community facilities, green network and open space in ,policy 9 Climate Change, Sustainability and Energy Infrastructure, Policy 10: Design and Placemaking , Policy 11:Transport Policy 13: Community Facilities and Open Space , Policy 17: Natural Environment, Policy 18: Water Environment and Flood Risk , Policy 19: Historic Environment and Policy 20: Waste

The Scottish Government's Control of Woodland Removal Policy and Glasgow City Region Forestry & Woodland Strategy