

Planning objection

I have been a resident of Lenzie for the last 50 years and currently live on [REDACTED]
As a young boy I played on my BMX bike on a part of the old railway line at the proposed development (at the bottom of Middlemuir Road) and today I use the Whitegates Park daily to enjoy the open green space with my dog and / or my children. The fresh and green space is also a mental health release for me personally.

Concerned over the extra traffic these narrow roads in the area will not be able to handle and create a dangers to themselves and others (see roads in diagram below) and understand the road consultants carried out observations when it was a local holiday and roads were unusually quiet.

The key areas which I base my objection on are as follows:

1. 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. Planning balance The application attempts to frame the development as a choice between a new school and the protection of Whitegates Park, but planning policy requires both public infrastructure and protected open space to be delivered without sacrificing one for the other.

2. Conflict with Specific NPF4 Policies Policy 1 - needs development to contribute to tackling the climate and nature crisis rather than exacerbate it. Policy 3 Nature Crisis Loss of established habitats/woodland/deletion of ecological corridors are inconsistent with the requirement for nature-positive development. Proposed mitigation does not demonstrate measurable biodiversity enhancement. Policy 4 – Climate Mitigation & Adaptation Replacing permeable greenspace with hard surfaces undermines climate resilience on a site already known for surface-water issues. Policy 5 – Flood Risk SEPA mapping shows the site contains medium-risk flood areas. Policy requires avoiding vulnerable development in at-risk locations, not relocating a school into them, the precautionary approach required by NPF4. Policy 7 – Re-Use of Brownfield Land No transparent evidence has been provided that brownfield or previously-developed options, including the current school site, were properly evaluated. Policy 23 – Health & Safety (Contamination) The site contains asbestos, lead, carcinogens, and ground gas. Proposed remediation relies on capping and modelling rather than removal, failing to meet the precautionary principle.

3. Conflict with LDP2 Policy 13 (Open Space Protection) not demonstrated that the loss of open space meets the strict criteria requiring equivalent replacement. which is fundamentally inconsistent with the intent of NPF4 Policy 20 and LDP2 Policy 13.

4. Inadequate & Inconsistent Site-Selection Process No transparent, comparative assessment of alternatives has been published. Assertions that the current Myrtle Avenue site “cannot accommodate” the new school are unsubstantiated. The proposed building footprint (approx. 6,785 m²) could be accommodated on the existing pitches, • extensive made ground and peat on proposed site • contamination including asbestos, lead, BaP, nickel • high water table and unstable ground requiring abnormal foundation solutions • ecological sensitivities including protected species and 24 bat-potential trees These were flagged in the 2018 ASN Feasibility Addendum and remain unresolved. The evidence presented suggests that redevelopment of the existing campus has not been ruled out on definitive technical grounds, and therefore the conclusion that Whitegates Park represents the “only realistic opportunity” for a new Lenzie Academy is not adequately substantiated. The Planning Statement concludes that Whitegates Park represents the “only viable site” for a replacement Lenzie Academy. However, the document indicates that the feasibility study considered only four sites within the catchment area and does not demonstrate that a comprehensive search for alternative locations was undertaken. Does not provide a transparent scoring matrix or objective comparative assessment between options. The conclusion that Whitegates Park is the sole realistic option therefore appears to arise from a limited site appraisal rather than a robust demonstration that no reasonable alternatives exist.

5. 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.

6. Deficient Public Engagement & PAC Failures Engagement was limited primarily to the school community rather than the wider population who rely on the park. Key documents were unavailable during consultation. The process failed to demonstrate openness, transparency, or meaningful consideration of alternative sites.

7. Health, Safety & Environmental Risk The site contains significant contamination risks, including asbestos fibres and carcinogenic compounds.

8. Loss of Accessible Open Space The land-take has increased by over 30% since early plans (52,053 m²)

9. Ecological Value & Survey Gaps The site supports species of conservation concern including red-listed and amber-listed birds, and 24 trees with bat-roost potential. This fragmentation of a functioning nature network conflicts with the requirements of NPF4 Policy 3 to strengthen and restore ecological connectivity.

10. Inadequate Biodiversity Mitigation The Council has not demonstrated that Whitegates Park can achieve the mandatory biodiversity uplift required by NPF4 Policy 3(b).

11. Community Wellbeing & Equity Whitegates Park is one of the few accessible greenspaces in eastern Lenzie. worsens existing inequities identified in the Open Space Strategy.

12. Loss of Sports Facilities The park's football pitch, now recognised by the applicant as a full formal pitch, will be removed without replacement. This conflicts with both NPF4 Policy 3 and LDP2 Policy 17.

13. Visual & Townscape Impact A four-storey block is proposed only 30 m from a Conservation Area and Townscape Protection Area, , the applicant cannot demonstrate compliance with NPF4 Policy 1 or LDP2 Policy 19.

14. 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.

15. Transport, Access & Parking Problems will exceed practical capacity during peak periods once school traffic is added. Unrealistic drop-off calculations given by applicant. surrounding streets including Parkview Avenue and Middlemuir Road. The Transport Assessment identifies Larkfield Road as wholly unsuitable for school drop-off activity. However, the traffic modelling assumes that all pupils arriving by car will be dropped off within the site. In practice, if congestion occurs at the formal drop-off facility, drivers are likely to divert to nearby streets including Larkfield Road. Given the constrained nature of this road and existing peak-time congestion, the potential impact of displaced drop-off traffic does not appear to have been assessed. 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 and Monkland Avenue - 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.

16. Flooding, Drainage & Climate Risks Flood-risk assessment and drainage proposals remain incomplete and not properly assessed.

17. Undisclosed Scottish Water Trunk Main Constraint A 315 mm trunk main lies along the boundary and requires a technically complex diversion. undermines deliverability and breaches NPF4 Policy 9.

18. Contamination, Peat & Ground Instability Made ground, ash, coal waste, peat and high water table create major engineering, climate, and cost risks. The volume of peat removal is undisclosed. Compliance with NPF4 Policies 2 and 10 cannot be demonstrated.

19. Severe Public-Health Risks from Contamination Council reports confirm alarming contamination levels: • Lead up to 1,400 mg/kg (significantly exceeding guideline levels typically applied to residential or school environments, 310 mg/kg) • Benzo(a)pyrene above safe limits • Asbestos fibres detected • Nickel above thresholds Despite this, This is not an acceptable basis for a school development.

20. Unjustified Pupil-Roll Expansion Projected rolls decline to around 1,140 by 2028/29, yet the proposal is for a 1,400-pupil school. The case for expansion is not evidence-based and does not justify sacrificing a protected greenspace.

21. Failure to Comply with PAN 3/2010 (Community Engagement)

22. Public access to paths • Prior to determination, the applicant must clearly identify all pedestrian and cycle routes within and adjoining the site and confirm, by plan and supporting statement, which routes will be publicly accessible. • Any routes identified as public must be retained or re-provided on a like-for-like basis in terms of alignment, permeability and quality, and must remain open and available for public use at all times, including outside school hours. • No gating, fencing, surveillance-led restriction or temporary closure of these routes shall be permitted unless expressly approved through a further planning application.

23. Noise and Light The baseline noise survey relies on short 10-minute measurements rather than continuous monitoring.

Option 1: Under Section 25 of the Town and Country Planning (Scotland) Act 1997, planning decisions must be made in accordance with the Development Plan unless material considerations indicate otherwise. In this case, the proposal conflicts with multiple Development Plan policies and no material considerations have been demonstrated that would justify departing from them. The proposal fails on environmental, policy, health, and transparency grounds. I urge refusal and recommend the Council pursue a compliant solution on a suitable alternative site.



