

## **Flood Risk & Water Management NPF4 Policy 22**

This application fails to demonstrate that the site can be safely developed without increasing flood risk to the surrounding area, with reference to Scottish Environmental Protection Agency (SEPA) has filed a holding objection due to an inadequate Flood Risk Assessment. If EDC own consultants haven't proven the site won't flood. or cause Lenzie /Kirkintilloch to flood – the plan contradicts NPF4 Policy 22 Flood Risk & Water Management. I urge the planning board to refuse the application it does not provide a robust guarantee that existing homes will be protected during 1-in-1000 -year storm events. Also like to mention Scottish Water requirements for protecting the trunk main running through the site, was one of many red flags that made the ASN school move to Waterside , my opinion is the council are attempting to engineer their way around this major feet rerouting the main will be expensive & complex , with the scrutiny of pump testing to see how SW assets & the subsoil react to the massive weight of a secondary school .

I also want to add as a resident very close to this site the proposed development threatens the “insurability” of my home , by alternating the natural drainage this could cause properties to be redesignated as high -flood risk zones, this imposes an unfair financial burden on residents through increased premiums & could potentially devalue our homes our sanctuaries .I request a guarantee that this council will be held liable , current data is insufficient to protect my insurance status.

## **Ground Contamination & Public Safety**

Historically a Gasworks , this site poses a significant risk to Public Health & the environment due to known toxic & phytotoxic contamination .Also want to highlight the councils own feasibly study 2018 deemed the site unviable not to mention the £4.8 million cost to remove hazardous waste ground gas & chemicals that have been settled for decades reprofiling the land risks disturbing these toxins.

## **Loss of Protected Open Space & Green Network Function**

This proposal results in the unacceptable loss of a **CORE** community asset & protected green space in Kirkintilloch, contrary to EDC Local Development Plan 2(LPD2).

The proposed development would

- Remove this protected open space
- Sever green network connectivity
- Reduce access to nature for the local community.

This conflicts with the policies

- NPF4 Policy 11 (Play, Recreation & Sport)
- NPF4 Policy 8 (Green Belt & Green Networks)
- LDP2 Open Space Policies

Whitegates Park is a well-used, accessible green space that supports, recreation as well as physical & mental well-being, & would not like to see the destruction of this.

### **Irreversible Loss of Priority Habitats (Ecological Impact Assessment Feb2026 ECIA)**

The ECIA confirms the development will permanently destroy irreplaceable habitats of Local importance.

- 60% of broadleaved woodland
- 61% of wet woodland
- 77% of lowland fen
- 100% of semi-improved neutral grassland
- All scrub habitat
- 85 mature trees including willow, birch, alder & sycamore.

This directly conflicts with NPF4 Policy 3 (Biodiversity) which require major developments to conserve, restore and enhance, leaving nature in a better state.

### **Impacts on Protected & Priority Species**

The ECIA also identifies

- 35 trees with bat roost potential, which will be felled
- Loss of key foraging & commuting habitat for pipistrelle bats
- Birds including red & amber listed species. Such as house sparrow, starling, thrush, willow, warbler, dunnock & swift, local importance
- Loss of wetland & terrestrial habitat used by amphibians

Report confirms, the loss of foraging habitat & commuting routes cannot be fully mitigated. Noncompliance with **Habitats Regulations, Wildlife & Countryside Act 1981 & NPF4 Policy 4 (Natural Places)**

### **Inadequate & Unsecured Off-site Compensation (Myrtle Avenue )**

The “biodiversity enhancement” planned on the Myrtle site does not compensate for the immediate destruction of established ecosystems, peat bands & the Tree Preservation Order (TPO) recently placed on this park’s trees. This failed mitigation hierarchy does not meet the requirements **NPF4 Policy 3**

### **Road Safety & Infrastructure**

The surrounding road network specifically Parkview Avenue & Court, Monkland Ave, Middle Muir Road Laurel Ave & Woodside Ave are insufficient to handle the increased traffic volume, these narrow residential streets were not designed for major secondary school traffic flow, further concerns regarding pedestrian safety for children walking to the new site through these congested residential junctions.

### **Failure of the Site Selection Process**

The Councillors failed to adequately consider alternative, more suitable sites, ignoring prior technical advice that deemed Whitegates unsuitable.

Recent confirmation that the £145 million interest bill , exceeds the actual construction costs , the financial burden , & ballooning costs of capital investment debt levels are becoming unsustainable for a council of this size could put this council at risk of bankruptcy , & cannot see how this project can be delivered , how can this justify the remediation cost of the Whitegates site .