



enhancing greenspaces. As a local resident, I regularly use Whitegates Park, for leisure, and to enjoy the health

*process.” This material is up to >5 m deep and likely originates from the former gasworks and colliery. These described as “blackish or dark grey ashy material... predominantly ash... likely associated with an industrial of nickel and 2 exceedances of benzo(a)pyrene were identified.”* All exceedances occur in Mad  
The DQRA confirms widespread contamination in the made ground - *“17 exceedances of leac*

### 3. Significant Contamination Identified

remediation.

directly contradicts the applicant’s current claim that the site presents “Low” risk and requires no for mainstream pupils without a significantly higher s<sup>1</sup>tandard of evidence. The Council’s earlier decision the Council’s previous conclusion. If the site was unsuitable for ASN pupils, it cannot be assumed to be safe

constraints that made the site unsuitable for ASN pupils still exist. The DQRA does not address or reconcile

are high-risk sources of carcinogenic PAHs and heavy metals. Despite this, the applicant proposes no remediation, which is incompatible with the contamination profile.

#### **4. Unsupported Modelling Assumptions**

The DQRA relies heavily on default values rather than school-specific or site-specific data. Examples include - *“No school values available... selected value is the CLEA default for office and warehouse buildings.” “As no site-specific bioavailability data is available... 100% bioavailability has been assumed.” “1% soil organic matter... value adopted for GQRA screening.”*

These assumptions are not protective of children and do not meet LCRM requirements for representative data. The use of adult-oriented defaults (e.g., warehouse air exchange rates) systematically underestimates risk.

#### **5. Incorrect Receptor Definition**

The DQRA models exposure only for pupils aged 11-16, and states that the current Lenzie Academy does not have a sixth form with 17 and 18 year old pupils. It does not assess - visiting primary pupils, younger siblings accompanying parents, community users of pitches, staff and maintenance workers

LCRM requires assessment of the most sensitive plausible receptor, which has not been done.

#### **6. Outdoor Exposure Not Properly Assessed**

The report acknowledges that contamination affects areas of proposed soft landscaping - *“Potential risks are confined to the more limited areas of proposed soft landscaping... in the south-west of the site.”* These are precisely the areas where children will play, gather, and engage in sports. The DQRA does not assess - dust generation from ash-rich fill, soil disturbance during landscaping, future changes to soft landscaping

This is a material omission under NPF4 Policy 10(e).

#### **7. No Construction-Phase Risk Assessment**

The DQRA does not assess - dust inhalation during excavation, risks to construction workers, risks to neighbouring residents, risks to pupils in the existing school during construction

Given contamination levels (e.g., lead up to *“1400 mg/kg”*), this omission is significant and contrary to NPF4 Policy 23 and HSE guidance.

#### **8. SSACs Are Not Demonstrated to Be Protective**

The site-specific assessment criteria (SSACs) produced are extremely high compared to the generic criteria. Such large increases indicate that the model is highly sensitive to the chosen assumptions. Without site-specific data, these SSACs cannot be considered reliable or protective.

#### **9. Policy Non-Compliance**

The application fails to demonstrate compliance with -

NPF4 Policy 23 - Health and Safety -The applicant has not shown that significant health risks are avoided.

NPF4 Policy 10 - Sustainable, Liveable Places -Outdoor environments for children must be safe and high-quality; this has not been demonstrated.

LDP2 Policy 5 - Environmental Protection -The applicant has not shown that contamination is understood or mitigated.

LCRM -The assessment fails to characterise contamination adequately, assess the most sensitive receptor, or justify key modelling assumptions.

#### **10. Required Actions Before Determination**

The planning authority should require -

- Additional site investigation, including delineation of Made Ground A and bioaccessibility testing
- A revised DQRA using school-specific exposure parameters

