

Whitegates Park provides flat, accessible grass and paths that are essential for everyday local use, including walking, running, cycling, dog walking, and informal recreation.

I live locally and use this space weekly for cycling and running. Its accessibility, proximity, and simplicity make it uniquely valuable and not realistically replaceable elsewhere.

The proposed alternative provision would reduce accessibility for nearby residents, particularly children, older people, and those with limited mobility.

This conflicts with [National Planning Framework 4](#) (NPF4), including:

- [Policy 1 – Local Living](#)
- [Policy 3 – Nature](#)

3. Contaminated Land and Site Suitability

The site has a known history of contamination, with a previous application refused in 2018 partly on these grounds.

The current proposal relies on a capping strategy while also involving significant ground disturbance, including bund construction and drainage works. This creates a clear risk of disturbing contaminants and undermining remediation.

Given the proposed use as a school, a highly sensitive end use, there must be clear evidence that the site is safe. This has not been adequately demonstrated.

4. Value for Money and Site Selection

Development of this unallocated greenfield/open space site, particularly with contamination constraints, is likely to involve significant additional public cost.

NPF4 promotes efficient land use and plan-led development. It is not evident that this represents the most sustainable or cost-effective option compared to alternatives.

5. Traffic, Drainage, Flood Risk, and Water Environment

The development will generate significant additional traffic, with impacts on road safety and congestion, particularly at peak school times.

In addition, the proposed drainage and bunding arrangements introduce uncertainty regarding:

- Surface water management
 - Potential mobilisation of contaminants
 - Long-term system performance
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These risks must be assessed robustly in line with NPF4 requirements to avoid increasing flood risk and protect the water environment.

Recent decisions by Scottish Ministers, including the refusal of the Lomond Banks development, demonstrate the application of a

precautionary approach under NPF4, where **flood risk and environmental uncertainty alone were sufficient grounds for refusal**.

In this context, the current proposal raises similar concerns and appears premature.

6. Biodiversity, Green Networks, and Natural Environment (including Peatland Principles)

Whitegates Park contributes to local biodiversity, green networks, and natural environmental functions, including carbon storage and climate resilience.

Its loss would:

- Fragment habitat and green corridors
- Remove established natural assets
- Reduce environmental quality within the local area

This conflicts with:

- **LDP2 Policy 28 – Green Infrastructure and Green Networks**
- **National Planning Framework 4 (NPF4) Policy 3 – Nature**, which requires protection and enhancement of biodiversity

NPF4 also places strong emphasis on protecting carbon-rich soils and natural assets, including peatland principles of **avoiding disturbance and preventing release of stored carbon**. While this site may not be formally classified peatland, the same precautionary approach to protecting natural ground conditions is relevant.

As demonstrated in the refusal of the **Lomond Banks development**, developments that result in **loss of natural assets or fail to demonstrate clear environmental benefit are unlikely to be supported**, even where other benefits are claimed.

7. Precedent and Plan-Led System Integrity

Approval of this proposal would undermine the plan-led system by allowing development on unallocated and protected open space.

This risks setting a precedent for similar proposals and eroding confidence in the Development Plan process, contrary to the principles of **National Planning Framework 4 (NPF4)**.

Conclusion

The proposal:

- Conflicts with the **adopted Local Development Plan 2**
- Results in loss of **valued and accessible open space**
- Fails to provide equivalent local provision
- Raises unresolved **contamination, drainage, and flood risk concerns**
- Conflicts with **NPF4 policy on nature, climate, and sustainable development**

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