

The remainder of my objection addresses the Transport Assessment (PL45) – Fundamental Policy, Safety and Evidential Failures.

This objection is made on the grounds that the Transport Assessment (“TA”) is materially deficient, internally contradictory, policy non-compliant, and incapable of being relied upon as a lawful evidential basis for determination. The failures identified below are material planning considerations and go directly to road safety, residential amenity, and compliance with national and local planning policy.

### **1. Failure to Comply with Transport Scotland Transport Assessment Guidance**

The TA fails to comply with Transport Scotland’s *Transport Assessment Guidance*, which requires assessments to be based on -

- accurate baseline traffic data
- representative neutral survey periods
- identification of peak periods
- assessment of all critical links and junctions
- robust modelling of forecast conditions

Section 5.11 requires -

- current traffic flows on links and at junctions within the study area
- identification of current peak periods on the adjacent road network
- identification of critical links and junctions.

The submitted TA fails to satisfy these requirements.

#### **1.1 Baseline Traffic Data Is Not Representative**

The TA confirms that the principal traffic surveys were undertaken on Tuesday 22 April 2025, during school term time. This date is materially flawed. It was the first school day following Easter Monday, a period known to produce suppressed and unrepresentative traffic conditions. This directly conflicts with Transport Scotland guidance on neutral traffic conditions.

The TA itself acknowledges at paragraph 2.3.13 that traffic flows on that date were lower than the weekday average. This is a direct admission that the baseline traffic evidence is not representative.

#### **1.2 Survey Period Further Distorted by Study Leave**

Study leave for S4–S6 pupils commenced on Friday 25 April 2025. This means that part of the survey period coincided with significantly reduced school attendance, which would materially reduce -

- school drop-off traffic
- bus movements
- pedestrian flows
- cycling movements
- residential overspill parking

The TA therefore fails to represent full operational school conditions.

#### **1.3 No Neutral Period Assessment**

The TA has not been undertaken during a neutral and representative period as required by national guidance.

This is a fundamental evidential flaw.

## **2. Conflict with NPF4 Policy 13 – Sustainable Transport**

The TA fails to comply with NPF4 Policy 13, which requires development proposals to be supported by accurate and effective transport appraisal evidence. The assessment relies on -

- suppressed post-holiday traffic flows
- incomplete receptor analysis
- no realistic school peak stress testing
- no assessment of seasonal variation, weather conditions, or peak spread

Accordingly, the evidence base is not sufficiently robust to satisfy Policy 13.

## **3. Conflict with NPF4 Policy 27 – Transport Infrastructure**

The TA also conflicts with NPF4 Policy 27 because it relies upon infrastructure mitigation that does not currently exist and is not secured.

The TA identifies the need for -

- a new controlled crossing on the A806
- a new Toucan crossing on Woodilee Roa
- traffic calming in the Middlemuir / Hazel / Laurel area
- waiting restrictions and speed limit changes

However, the TA expressly states that these matters will be “progressed separately.” This is a critical failure.

The TA does not demonstrate that the existing network can safely accommodate the development in the absence of these measures. Any measures requiring a Traffic Regulation Order remain uncertain and cannot lawfully be assumed.

## **4. Failure to Assess All Material Junctions and Receptors**

Although the TA identifies residential streets as likely unofficial drop-off areas, it fails to assess several materially affected locations, including -

- Myrtle Avenue / B757
- Lenzie Station area
- Gallowhill Road corridors
- surrounding residential streets (Middlemuir area) likely to receive displaced parking and drop-off traffic

This omission materially understates the likely impact of the proposal.

## **5. Existing Congestion Materially Downplayed**

The TA records existing substantial queue lengths at the A806 / Menzies Drive / Woodilee Road junction -

- 30–45 vehicles during the AM peak
- approximately 25 vehicles during the PM peak

The TA's characterisation of these conditions as merely “typical” materially downplays existing network stress. No robust evidence is provided to demonstrate sufficient spare capacity.

## **6. No Sensitivity Testing**

The TA contains no sensitivity testing for -

- winter darkness
- adverse weather
- exam periods
- seasonal traffic variation
- widened peak spread conditions

This is contrary to accepted transport assessment methodology and materially weakens the conclusions.

## **7. Conflict with NRDG**

The TA conflicts with the National Roads Development Guide.

### **7.1 New Signalised Access on Distributor Road**

The A806 is identified as a regional distributor road where direct access is normally inappropriate. Despite this, the proposal introduces a new signalised access junction. This is contrary to road hierarchy principles unless fully justified. No adequate justification is provided.

### **7.2 No Safety Assessment of Strathkelvin Path**

The TA provides no assessment of -

- tunnel pinch points
- blind corners
- cyclist / pupil conflict
- lighting adequacy
- winter safety
- high-volume pedestrian movements

This is a material omission.

## **8. Conflict with LDP2 Policies**

### **8.1 Failure to Demonstrate Safe Routes to School**

The TA acknowledges -

- no footways on sections of the A806
- no crossing at Garngaber Avenue
- limited access points to the Strathkelvin Path

This fails to demonstrate safe and direct routes for pupils.

### **8.2 Failure to Protect Residential Amenity**

The TA identifies surrounding streets as likely unofficial drop-off areas but provides no robust assessment of -

- parking stress
- turning conflict

- obstruction
- residential access impacts
- pedestrian safety

This conflicts with LDP2 Policy 12.

### **9. Material Understatement of Residual Cumulative Impact – Middlemuir Area**

TA's internal contradictions regarding drop-off demand in the Middlemuir Road area. The TA contains materially inconsistent figures -

- Table 4 states that 456 pupils will be dropped off
- Table 13 states that the Middlemuir area has potential AM drop-off demand of 175 vehicles
- yet paragraph 5.1.5 states that the drop-off demand is only 110 vehicles

No methodology is provided to explain this reduction. This constitutes a material understatement of the residual cumulative impact on the local road network and surrounding streets. The Middlemuir / Hazel / Laurel area is physically incapable of safely accommodating this demand. These streets are narrower than Myrtle Avenue and are already constrained by -

- restricted carriageway width
- existing on-street parking
- poor turning capacity
- limited passing opportunities

They are plainly unsuitable for concentrated school drop-off traffic.

The TA therefore materially understates -

- queueing
- obstruction
- pedestrian conflict
- overspill parking
- resident access issues
- emergency vehicle access risks

### **10. Residual Cumulative Impact**

The Transport Assessment (TA) further fails to account for the residual cumulative impact of the development, even assuming proposed mitigation measures are implemented. The TA does not demonstrate that -

- local streets (Middlemuir, Hazel, Laurel, Moncrieff) can safely absorb additional drop-off traffic
- the A806 and B757 junctions have sufficient capacity during peak periods
- displaced parking and informal drop-offs will not adversely affect residential amenity, access, or safety
- pedestrian and cyclist conflicts along the Strathkelvin Path are adequately mitigated

This omission constitutes a material planning failure, in conflict with NPF4 Policies 13 and 27 and LDP2 Policy 12.

### **11. Conflicts with SG Designing Places and Designing Streets Policies**

The proposal conflicts these policies.

- The use of a quiet residential street for school drop offs is discouraged
- Scottish Government 2025 School Transport Guidance expects Councils to assess if the road is suitable. The roads of Middlemuir/Laure/Hazel are not suitable. They are narrow and will prohibit residents access to their own homes due to parents parking at drop off and collection. These streets cannot accommodate the increased traffic
- If the proposed main entrance on Initiative Road is insufficient. This will lead to “rat runs” in the residential street
- Designing Streets policy states that streets should be “social places” first and motor vehicle dominance should be reduced
- Loss of amenity – noise, fumes and congestion will negatively impact the character and quiet nature of these streets

## **12. Failure to Assess Garngaber Tunnel Safety**

The TA wholly fails to assess the safety implications of the Garngaber Tunnel.

This location is -

- narrow
- poorly lit
- visibility constrained
- enclosed
- subject to pedestrian and vehicle conflict

It is unsuitable for materially increased pupil flows without a full safety audit. No such assessment has been provided.

## **13. Overlooked pupil and staff safety**

PL 54, part 2 – “A public route will pass through the school entrance plaza, connecting to the southern pedestrian route and providing continued public access”. Under Scottish Outdoor Access Code, access rights do not apply to land next to a school, and which is used by the school.

## **14. Conflicting distance measurement**

*17.1.3 - Under the proposals, a new school would be constructed on a site at Whitegates Park, approximately 650m to the east*

Statutory Consultation Boards 13<sup>th</sup> June 2025 - *Whitegates Park - Distance to existing school: 1.2km*

## **15. No assessment of pedestrian/cyclist safety**

The TA provides no assessment of - conflict between cyclists and large pupil volumes, lighting adequacy, winter conditions.

This is a breach of National Roads Development Guide 1.7, 2.3.6, and 3.1.4

## **16. TA omits to mention residential areas to the West**

*7.1.3 - The site lies between the residential areas around Monkland*

*Avenue to the north and Larkfield Road to the south, and is bounded by A806 Initiative Road*

*to the east, and the Strathkelvin Railway Path (Core Path ED/628/1) to the south-west, which follows the line of a disused railway between Woodilee Road and Lenzie Road.*

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## CONCLUSION

For all the reasons set out above, the Transport Assessment is materially flawed, internally inconsistent, and policy non-compliant. It -

- relies on unrepresentative traffic data
- omits key receptors
- depends on unsecured mitigation
- understates cumulative traffic impact
- fails to protect residential amenity
- fails to assess significant road safety hazards

Accordingly, the planning authority cannot lawfully rely upon the TA in its current form.

I therefore respectfully request that the planning application is refused, and the TA be fully re-scoped, re-surveyed, and re-submitted before any determination is made.