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Planning Application £ East Dunbartonshire Council

**Subject: Objection to Planning Application TP/ED/26/0104- Proposed Secondary School at Whitegates Park**

Dear Sir/Madam,

I am writing to **formally OBJECT** to Planning Application **TP/ED/26/0104** for the construction of a secondary school at Whitegates Park, Lenzie. My objection is based on material planning considerations, including ecological impacts, loss of designated open space, conflict with National Planning Framework 4 (NPF4), and failure to demonstrate biodiversity enhancement.

### **1. Irreversible Loss of Priority Habitats (Ecological Impact Assessment, Feb 2026)**

The Ecological Impact Assessment (ECIA) confirms that the development will permanently destroy irreplaceable habitats of Local importance. The report identifies the following losses:

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

The ECIA states:

- *"The wet woodland resource within the site is effectively lost."*
- *"Lowland fen habitat cannot be recreated."*
- *"Replacement planting cannot mitigate for the loss of mature trees."*

These habitats are irreplaceable within the site boundary, and their loss is assessed as a **significant adverse effect at the Local level**.

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

### **2. Impacts on Protected and Priority Species**

The ECIA identifies:

- **35 trees with bat roost potential**, 74% of which will be felled
- Loss of key **foraging and commuting habitat** for pipistrelle bats (a European-Protected Species)
- A **diverse breeding bird assemblage of Local importance**, including red- and amber-listed species such as house sparrow, starling, song thrush, willow warbler, dunnock and swift
- Loss of wetland and terrestrial habitat used by amphibians, including common frog, toad and palmate newt

The report confirms:

- *"The loss of foraging habitat and commuting routes... cannot be fully mitigated."*

This raises concerns regarding compliance with the **Habitats Regulations**, the **Wildlife and Countryside Act 1981**, and **NPF4 Policy 4 (Natural Places)**.

### **3. Loss of Designated Open Space and Green Network Function**

Whitegates Park is designated in LDP2 as **Open Space of Neighbourhood Importance (OS139)**. It also functions as a **Green Network Hub**, providing ecological connectivity to nearby Local Nature Conservation Sites.

The proposed development would:

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

This conflicts with:

- **NPF4 Policy 11 (Play, Recreation and Sport)**
- **NPF4 Policy 8 (Green Belts & Green Networks)**
- **LDP2 Open Space policies**

### **4. Failure to Demonstrate Biodiversity Net Gain (NPF4 Policy 3)**

NPF4 Policy 3(b) requires major developments to leave biodiversity in a **demonstrably better state**.

The ECIA confirms that:

- Key habitats **cannot be replaced**
- Myrtle Avenue **cannot recreate fen or mature woodland**
- Myrtle Avenue is **not yet designed, approved, or submitted**
- Significant adverse effects remain **even after mitigation**

Therefore, the application **fails to meet the statutory requirements** of NPF4.

### **5. Inadequate and Unsecured Off-Site Compensation (Myrtle Avenue)**

The ECIA repeatedly states that off-site works at Myrtle Avenue are required to offset "significant residual effects".

However:

- No planning application exists
- No design exists
- No delivery mechanism is secured
- No timeline is provided
- Key habitats cannot be recreated there

This fails the **mitigation hierarchy** (avoid - minimise - restore - compensate) and does not meet the requirements of **NPF4 Policy 3**.

## **6. Loss of Valued Community Open Space**

Whitegates Park is a well-used, accessible green space that supports:

- Recreation
- Physical and mental wellbeing
- Community identity
- Local biodiversity

Its loss would have a negative impact on the community and contradicts the aims of **NPF4 Policy 11** and **LDP2 Open Space Strategy**.

## **Conclusion**

For the reasons outlined above - including irreversible habitat loss, impacts on protected species, loss of designated open space, conflict with NPF4, and the absence of secured or adequate compensation - I respectfully request that East Dunbartonshire Council **REFUSE** Planning Application **TP/ED/26/0104** .

PERSONAL STATEMENT:

Yours faithfully,

