

Planning

From: [REDACTED]
Sent: 27 April 2026 13:26
To: Planning
Subject: Objection to Planning Application TP/ED/26/0104

27th April 2026

Planning Applications 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, Kirkintilloch.

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**.

East Dunbartonshire Council members were not apprised of all the facts when they made their decision based on the advice of council officers.

The original cost estimate of c£85m for the complete project did not take into account the remediation costs involved in preparing the site and has since risen to c£138m with the addition of potential interest repayments of c£245 which the Council was not aware of when choosing the Whitegates Park site as the preferred option.

Yours faithfully,



