

Planning

From: [REDACTED]
Sent: 22 April 2026 12:19
To: Planning
Subject: Planning ref - TP/ED/26/0104

I wish to formally object to the proposal – Planning ref - TP/ED/26/0104

The loss of Whitegates Park, directly affecting access to local greenspace, will adversely affect the community. To remove a public park from Kirkintilloch (G66 3BS), and to mitigate this with a proposed park in affluent Lenzie is a social injustice. This should not be allowed to proceed.

It is considered that the proposed development is contrary to the Development Plan when read as a whole, including the adopted Local Development Plan (LDP2) and National Planning Framework 4 (NPF4), and should be refused for the reasons set out below.

1. Loss of Protected Open Space (NPF4 Policy 21: Play, Recreation and Sport)

The application site is designated as protected open space within LDP2.

In terms of NPF4 Policy 21, development resulting in the loss of outdoor sports facilities and recreational space will only be supported where -

- the facility is no longer required
- the proposal is ancillary to the principal use of the site
- the loss would be replaced by equivalent or better provision in a suitable location

The applicant has not demonstrated that the site is surplus to requirements. The existing football pitch and open space are actively used and contribute to local recreational provision.

The proposed compensatory provision, located approximately one mile from the site, fails to meet the “equivalent or better” test, particularly in terms of accessibility and established community use.

Accordingly, the proposal is contrary to NPF4 Policy 21 and the corresponding LDP2 open space protections.

2. Health and Amenity Impacts (NPF4 Policy 14: Design, Quality and Place; Policy 23: Health and Safety)

NPF4 Policy 14 requires development to be designed in a way that protects residential amenity, including from noise, disturbance, and light pollution. Policy 23 requires that development does not result in unacceptable risks to human health. The proposed layout places active sports pitches, parking, and drop-off areas in proximity (circa 35 metres) to residential properties on Larkfield Road.

The submitted Noise Impact Assessment identifies -

- noise increases of up to +10 dB above background levels;
- evening use of floodlit pitches until 21:00

An increase of this magnitude is widely recognised as a significant adverse impact. Evening operation further exacerbates this due to lower baseline noise levels and increased sensitivity.

In addition, the development introduces -

- intensified traffic generation and associated noise;
- artificial lighting impacts (including light spill and glare);
- increased activity adjacent to residential boundaries

The cumulative impact would result in a material deterioration of residential amenity, contrary to NPF4 Policies 14 and 23.

3. Climate and Sustainable Land Use (NPF4 Policy 1: Tackling the Climate and Nature Crises; Policy 2: Climate Mitigation and Adaptation)

NPF4 Policy 1 gives significant weight to the protection of natural assets, including green infrastructure, while Policy 2 promotes the sustainable use of land. The loss of established green space and permeable land undermines these objectives, particularly where alternative sites have not been adequately considered. The absence of a robust site selection process demonstrating why a protected greenfield site has been prioritised over brownfield or non-designated land is inconsistent with the spatial strategy and sustainability principles of NPF4 Policies 1 and 2

4. Failure to Demonstrate Need (NPF4 Policy 18: Infrastructure First)

NPF4 Policy 18 requires that infrastructure development is supported by evidence of need and aligned with planned growth. The proposed 1,400-pupil capacity is not supported by projected roll data, which indicates a decline to approximately 1,140 pupils within the catchment.

This represents a significant over-provision and raises concerns regarding -

- inefficient use of public resources;
- long-term underutilisation;
- unjustified development on protected land

The absence of robust, evidence-based justification for the scale of development is contrary to NPF4 Policy 18.

5. Procedural and Plan-Led Concerns (NPF4 Policy 13: Sustainable Transport; Planning Act 1997) The proposal effectively seeks to override the LDP2 designation of the site without undergoing the statutory plan review process. This is contrary to the plan-led system established under the Town and Country Planning (Scotland) Act 1997, which requires that land use changes of this nature are progressed through Local Development Plan review, including consultation and independent examination. Furthermore, the removal of Myrtle Avenue mitigation to a separate application prevents a full assessment of transport impacts, contrary to the integrated approach required under NPF4 Policy 13 (Sustainable Transport) and Policy 18.

As such, the application is considered premature and incomplete.

6. Contaminated Land (NPF4 Policy 22: Flood Risk and Water Management / Policy 23: Health and Safety) The site has a known history of contamination, including asbestos.

NPF4 Policy 23 requires that development on contaminated land demonstrates that:

- risks to human health are fully understood;
- appropriate remediation can be secured

No detailed or independently verified remediation strategy has been provided. This represents a significant information gap and introduces unacceptable uncertainty regarding site safety.

The proposal therefore fails to comply with NPF4 Policy 23.

7. Consultation and Evidence Base (NPF4 Policy 3: Biodiversity / Policy 14: Design and Place)

The consultation process does not provide a robust evidential basis for decision-making. The Education consultation did not assess support for the proposed site and excluded site-specific objections from its analysis. As such, it cannot be relied upon as evidence of community support. This undermines the transparency and robustness of the application and limits the weight that can be given to its supporting information

Conclusion

The proposed development:

- results in the unjustified loss of protected open space (contrary to NPF4 Policy 21);
- would give rise to significant adverse impacts on residential amenity (contrary to Policies 14 and 23)
- is not supported by a robust assessment of need (contrary to Policy 18)
- fails to demonstrate sustainable site selection (contrary to Policies 1 and 2)
- is procedurally unsound and premature within the plan-led system
- does not adequately address contamination risks

The proposal is therefore contrary to the Development Plan when read as a whole, and there are no material considerations which would justify a departure.

It is recommended that planning permission be refused.

