



The scale of loss:

These are ecologically valuable, functionally diverse habitats—not marginal land.

Mature trees

Species-rich grassland

Fen and wetland areas

Scrub habitat

Wet woodland

including:

The submitted Ecological Impact Assessment confirms substantial loss of high-value habitats,

2. Significant Loss of Existing Habitats

- Fundamentally undermines claims of biodiversity enhancement.
 - Represents a clear net loss of biodiversity
- This is in direct conflict with NPF4 Policy 3.

3. Conflict with Local Development Plan 2 (LDP2)

Whitegates Park is designated within LDP2 as:

A green corridor

A green network node

A habitat link

Protected open space

The proposal would:

- Remove and fragment this strategic green space
- Disrupt ecological connectivity
- Reduce public open space provision

This conflicts with:

LDP2 spatial strategy

Open Space Strategy and Audit

Green Infrastructure Strategy.

4. Impact on Green and Nature Networks

Whitegates Park forms part of a wider ecological network, including:

The LDP2 nature network

The Central Scotland Green Network

The Glasgow and Clyde Valley Green Network

The site is identified as:

A high-dispersal network area

A connectivity woodland network

The development would:

Cause irreversible fragmentation.

Undermine ecological connectivity.

Conflict with regional green network objectives.

5. Failure to Align with Green Infrastructure Commitments

East Dunbartonshire Council has committed to:

Enhancing green infrastructure.

Strengthening ecological connectivity.

Protecting key green assets.

The loss and degradation of Whitegates Park directly contradicts these commitments and undermines regional strategies.

6. Conflict with Green Infrastructure Guidance (2023) and NPF4 Policy 20.

The proposal conflicts with the Council's Green Infrastructure and Green Network Guidance (2023), particularly Section 4.3, which requires:

Full assessment of impacts on green network components

Ecological appraisal in line with CIEEM guidelines

A robust Ecological Impact Assessment (EclA)

Key Issues:

The submitted EclA does not adequately follow CIEEM best practice

It fails to demonstrate how impacts are avoided, minimised, or compensated.

It does not provide a policy-compliant framework for maintaining network integrity.

For these reasons, the application is in significant conflict with national, regional, and local planning

