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School at Whitegates Park

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.

destroy irreplaceable habitats of Local importance. The report identifies the following losses:

significant adverse effect at the Local level.

developments to **conserve, restore and enhance** biodiversity and leave nature in a **better state**.

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**.

7. NATURAL ENVIRONMENT/PROTECTION OF PEAT AND OTHER CARBON RICH SOILS POLICY 17 LDP2 states;

Peat and other carbon-rich soils should be protected and NOT BE DRAINED or disturbed by development. Mason Evans ground reports and subsequent ground reports identified up to 4.1m of peat below ground level at Whitegates Park.

NPF4 Policy 5 gives significant protection to peat and carbon rich soils because they function as important carbon stores, support biodiversity, regulate water, and help tackle the climate emergency.

PERSONAL STATEMENT:

The proposed loss of Whitegates Park represents far more than the removal of green space- it is the destruction of a vital heart of our community. For generations, this park has served as a shared sanctuary where people of all ages come together to connect with nature, exercise, socialise, and find peace. Its value to local residents is immeasurable, and its loss cannot be adequately compensated by a future “park” at Myrtle.

Whitegates Park proved itself to be a true lifeline during the COVID-19 pandemic, the park was an essential refuge for physical and mental wellbeing, it continues to serve that same quiet but critical role – a free, accessible, open space where people can escape the pressures of daily life, particularly in a time when mental health challenges remain widespread.

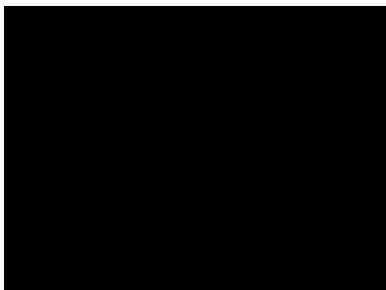
trees that have grown over decades, if not longer, will result in the irreversible loss of established canopy and biodiversity. These trees are not easily replaced; they provide vital habitat for birds, insects, and other wildlife, contribute to air quality, offer natural cooling, and sequester carbon. Their destruction will fragment important ecological corridors and diminish the park's ability to support local nature at a time when we should be protecting and enhancing such vital habitats, not sacrificing them.

considered able to provide all of the above described opportunities. In this respect, a loss of open space within the settlement of Lenzie is not considered viable given the existing pressure for provision and loss of community amenity. Additionally, the loss of a neighbourhood park of this standard and potential would not be acceptable in planning policy terms.”

planted elsewhere can truly restore what will be taken from our community. Whitegates Park is not just another patch of grass – it is living heritage, ecological infrastructure, and a cornerstone of local life, its loss will leave a permanent scar on our neighbourhood, not just visually but in the collective consciousness of a whole community who will have to bear witness to the needless destruction of this green lung should the proposal go ahead. What lesson are we teaching our children when we destroy places like Whitegates Park?

and local economy. They give us opportunities for recreation, sport and play and healthier lifestyles support wellbeing, contribute to a sustainable natural environment, provide vital habitats for wildlife and visually enhance the urban environment. They also provide valuable ecosystem services and support climate change action.”

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**



Yours faithfully,