

Planning

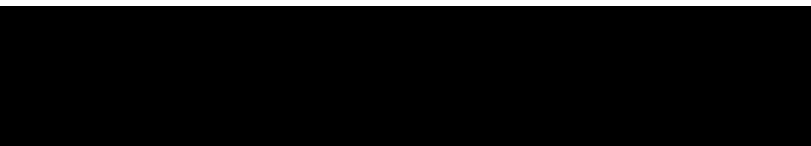
From: [REDACTED]
Sent: 30 April 2026 09:00
To: Planning
Subject: Planning Objection Policy Conflict with NPF4 Policy 5 Soils at Whitegates Park

TO PLANNING AUTHORITY, EAST DUNBARTONSHIRE COUNCIL

DATE: 29/04/26.

PLANNING REFERENCE: TP/ED/26/0104

PROPOSAL: NEW LENZIE ACADEMY, WHITEGATES PARK, LENZIE, EAST DUNBARTONSHIRE.



Formal Objection to Proposed Lenzie Academy Development at Whitegates Park.

Dear Planning Officer,

I wish to formally object to the proposed development at Whitegates Park on the grounds of non-compliance with National Planning Framework 4 (NPF4), specifically Policy 5: Soils.

The submitted ground investigation confirms the presence of peat deposits beneath extensive areas of the site, including zones classified as made ground. Furthermore, peat has already been identified as a key constraint within the feasibility study previously presented to councillors. This establishes that the site is clearly subject to the requirements of NPF4 Policy 5.

Policy 5D explicitly requires a site specific assessment i.e. peatland assessment, including a carbon-rich soils and peatland impact assessment, where development affects peat soils. No such assessment has been undertaken or submitted as part of this application. This omission represents a clear and fundamental conflict with Policy 5D

In addition, Policy 5a requires adherence to the mitigation hierarchy, with avoidance as the primary principle. Given the nature of the proposed development—likely involving cut-and-fill operations, below-ground infrastructure installation, ground improvement works, and drainage/SuDS systems—it is evident that disturbance of peat soils would be unavoidable. Such disturbance has well-established implications for carbon release, climate emissions, and long-term environmental harm. The proposal represents a clear and fundamental conflict with Policy 5a.

Policy 5b Development proposals on prime agricultural Land, or land of lesser quality that is culturally or locally important for primary use, as identified by the LDP, will only be supported where it is for:

- i. Essential infrastructure and there is a specific locational need and no other suitable site;

The proposal conflicts with policy 5b as there were suitable alternative options as detailed in the LA feasibility report submitted to Councillors in 2022 committee meeting, these include tandem build and other sites.

Policy 5c; Development proposals on peatland, carbon-rich soils and priority peatland habitat will only be supported for:

- i. Essential infrastructure and there is a specific locational need and no other suitable site,

The proposal conflicts with policy 5c as there were suitable alternative options as detailed in the LA feasibility report submitted to Councillors in 2022 committee meeting, these include tandem build and other sites.

The proposal therefore fails to demonstrate:

- Avoidance of peat disturbance in line with the mitigation hierarchy
- Assessment of carbon loss and climate impacts
- Appropriate mitigation measures to address environmental harm
- Compliance with 5b when there are alternative sites available which include tandem build, refurbishment of existing Lenzie Academy and alternative sites.
- Compliance with 5c when there are alternative sites available which include tandem build, refurbishment of existing Lenzie Academy and alternative sites.

It is also important to note that previous proposals for an ASN school at this location identified peat and ground conditions as a significant constraint to development. Both historic and recent investigations reinforce that carbon-rich soils are present and vulnerable, yet their disturbance has not been adequately assessed or quantified in this application.

Furthermore, the absence of a peat assessment raises additional concerns under NPF4 Policy 12: Zero Waste. There has been no demonstration of how excavated soils—potentially peat and possibly contaminated materials—would be managed, treated, or disposed of in a sustainable manner. Without this, the proposal fails to show compliance with waste hierarchy principles or confirm that materials would be suitable for reuse.

In summary, the proposal is contrary to NPF4 Policy 5 Soils due to:

- Failure to provide a required site specific assessment e.g a peat and carbon assessment (Policy 5d)
- Likely disturbance of peat without demonstrating avoidance (Policy 5a mitigation hierarchy)
- Non Compliance with 5b when there are alternative sites available which include tandem build, refurbishment of existing Lenzie Academy and alternative sites.
- Non Compliance with 5c when there are alternative sites available which include tandem build, refurbishment of existing Lenzie Academy and alternative sites.
- Lack of assessment of carbon emissions and environmental impact policy 5d
- Failure to address waste management implications for excavated soils (Policy 12)

Given these significant NPF4 policy conflicts and omissions, I respectfully request that this planning application be refused.

Yours faithfully,

