



Planning
Southbank House
Strathkelvin Place
Kirkintilloch
G66 1XQ

FAO Fraser McNair

Dear Mr McNair

Application reference : TP/ED/26/0104

Address: Whitegates Park Middlemuir Road, Lenzie

Proposal: Erection of a secondary school including road access, landscaping, car parking, sports pitches, recreational areas and associated development.

I refer to the above planning application and would like to submit my **objection** to the proposals for the following reasons.

1. Loss of green space

Whitegates Park, although not a greenfield site, is a well-used green space by the local community. It is identified as part of the green network for recreation in the LBAP Local Development Plan 2 (OS139). Developing on this site conflicts with the Local Outcomes Improvement Plan (LOIP) 2017 – 2027 which has as the aim of one of its guiding principles to: "...create the conditions for a better quality of life for East Dunbartonshire residents, by recognising their health and wellbeing needs without compromising the quality of our built, natural and historic environment. In doing so, we will build resilience to a changing climate, use our natural resources prudently and consider the long-term implications of our decisions for present and future generations." Parks and green spaces play an important role in the ability to improve lives and communities. For people who don't drive or who can't travel to spaces further afield, this green space is essential. Although there are other walks available in the Lenzie area, none provide the same safe and open space that allow for ball games, etc as all other spaces are either close to a road or have a restricted area.

The planning statement PL69 - Open Space refers to there already being a deficiency of 2.41ha in the current total provision of Public Parks and Gardens open space in Lenzie (13.77ha against the required 16.18ha). The proposal would increase this deficiency to 7.9ha (8.28ha against the required 16.18ha). To accord with Policy 20 of

NPF4, the proposal will need to demonstrate that it “would not result in or exacerbate a deficit in blue or green infrastructure provision” (i.e. not make the existing deficiency any worse) and to accord with Policy 13 of LDP2 will need to demonstrate that not only replacement facilities, but also enhanced facilities are “provided in a location that is convenient and accessible for users. Although it is proposed that there will be development of the existing school site at Myrtle Avenue, there is no guarantee of this unless there is a section 75 agreement in place to provide mitigation at this site. It is also unlikely that many people who live in the vicinity of Whitegates Park are going to walk all the way to Myrtle Avenue for what will be a reduced space for walking.

2. Trees / Biodiversity

It is stated in PL70 - Arboricultural Impact Assessment that there will be a canopy loss of 1.71 ha across the Whitegates site. This is significant for the local area. The loss of mature trees and wet grassland at Whitegates Park is unlikely to achieve an equivalent at Myrtle Avenue. It would take 20-30 years for mature trees to provide the equivalent habitat as is currently available at Whitegates.

3. Drainage / Flood Risk

It is accepted that some SUDS systems will not work on the site where there is a risk of mobilising contaminants from the existing ground. However, proprietary systems, such as a vortex, are not considered as a SUDS measure and all measures used should be sustainable.

In PL53 – Drainage Strategy the references to SEPA guidance are all out of date. These have been replaced by new guidance under Environmental Authorisation (Scotland) Regulations.

In PL06 – Proposed Site Levels it is stated that two small watercourses to north and east to be re-shaped/ realigned to reduce steepness of banks and make shallower. This may require authorisation from SEPA. At the south watercourse it is proposed that there will be land raising a creation of a steep bank but it is not clear whether there has been sufficient assessment of the capacity of the watercourse to take the new run-off flows from the site and the potential flood risk. No CCTV survey seems to have been carried out to ascertain if existing culverts can take the proposed flow from the site. There is already a partial blockage in the line that is proposed discharge point 3 that results in surcharging to the ditch behind Larkfield Road.

4. Traffic and Access

For the majority of car drop-offs from the west and south of Lenzie, drivers are going to use the streets surrounding Whitegates of Middlemuir Road, Woodside Avenue and Larkfield Road to avoid waiting in queues at the traffic lights on Woodilee Road. These residential streets are not designed for significant through traffic and parking will cause

issues. The proposed mitigations measures to erect signs to prohibit drop off at certain times are unlikely to be a deterrent unless enforced.

To ensure safe walking routes, a review of lighting provision on the Strathkelvin Railway Path should be carried out to ensure lighting is adequate but also the type of lights are considered so that light spill into neighbouring gardens and houses is minimal and prevents light intrusion.

5. Construction and Traffic Management Plan

The document PL58 - Construction Environmental and Traffic Management Plan refers to PPG's in section 3.10. However, these documents are all out of date and have been replaced by Guidance for Pollution Prevention (GPP) documents. As the site is greater than 4 ha it will also require a construction run-off permit from SEPA which would need to be in place prior to works commencing on the site. This has not been mentioned in the report.

I would urge East Dunbartonshire Council to reconsider the location for the new Lenzie Academy and pursue the options of either re-building on the existing site or continue discussion with Lenzie Rugby Club. It has been stated that the rugby club site is unsuitable due to the close proximity of Lenzie Moss SSSI. However, Lenzie Meadow Primary was able to be built so it's previously been demonstrated that there can be development in the vicinity with limited impact on the designated site. With suitable mitigation, the Moss can still be protected. This site would also ensure that no pupil or member of staff is having to travel further than they currently do and there is also an existing access point from Myrtle Avenue.

Yours sincerely

A solid black rectangular box used to redact the signature of the sender.