

## Planning

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**From:** [REDACTED]  
**Sent:** 14 August 2026 21:08  
**To:** Planning  
**Subject:** OBJECTION TP/ED/26/0104

Dear Planning officer,

I am writing to formally object to the above planning application. This email sets out material planning considerations arising from the conflict between the proposed development and East Dunbartonshire Council's own Climate Action Plan 2026-2040 (CAP).

I ask that this objection be registered in full and considered by the case officer and, if the application proceeds to committee, by elected Members.

### 1. Status of the Climate Action Plan as a material consideration

The CAP is a Council-approved strategic document setting out East Dunbartonshire's pathway to net zero and climate resilience to 2040. It sits alongside, and is intended to inform delivery of, the adopted Local Development Plan 2 (LDP2, November 2022) and the Council's Greenspace Strategy 2026-2031. Its objectives and commitments are directly relevant to the assessment of this application and constitute a material planning consideration, in addition to the statutory tests under LDP2 itself.

### 2. Conflict with the CAP's core objectives

The application conflicts with several of the CAP's five stated objectives:

- Objective 3 commits the Council to “integrate climate considerations including biodiversity gain into all Council decision-making processes” through “a standardised approach to climate change risk and impact assessments.” No such standardised, weighted or scored assessment was applied when Whitegates Park was selected as the preferred site in September 2022; officers explicitly declined to use a scoring matrix, notwithstanding that one had been used for the comparable Woodland View School site selection in 2018.
- Objective 5 commits the Council to “maximise the social, economic and environmental co-benefits of local climate action including nature-based solutions.” The application proposes the permanent loss of approximately 68,000m<sup>2</sup> area of established public greenspace, together with its trees, in favour of a smaller area of nature restoration proposed at the vacated Myrtle Avenue site. This is a net reduction, not a maximisation, of nature-based co-benefit.
- The CAP's commitment to climate justice recognises that “those without access to transportation may be unable to evacuate during a flood and communities without shading from urban green space experience higher temperature extremes during heatwaves,” and commits the Council to distributional and procedural equity. Whitegates Park is one of the principal freely accessible outdoor spaces serving this part of Lenzie/Kirkintilloch; its loss will disproportionately affect residents without gardens, cars or the means to travel to alternative greenspace.

### 3. Conflict with the CAP's Offsetting Hierarchy

The CAP sets out an explicit Offsetting Hierarchy, and states, consistent with national Statutory Guidance, that “residual emissions should only be offset as a last resort if there is no viable alternative,” a principle that extends to loss of natural capital and biodiversity, not only carbon. The Council's own site-selection record shows that avoidance of Whitegates Park was not tested on equal footing with mitigation/offsetting: refurbishment and tandem-build options at the existing Myrtle Avenue site were discounted primarily on grounds of cost, programme and disruption, without a transparent, weighted assessment showing how those factors were balanced against the loss of protected greenspace and the CAP's avoidance-first principle. The proposed “offset” of biodiversity enhancement at Myrtle Avenue does not amount to avoidance and should not be treated as satisfying the hierarchy.

#### 4. Conflict with the Greenspace Strategy and LDP2

The Council's own Draft Greenspace Strategy 2026-2031 describes East Dunbartonshire's parks and greenspaces as “essential public infrastructure, critical to the health and wellbeing of our communities, the resilience of our places, and the recovery of nature,” and sets quantity standards for open space provision. Whitegates Park is identified as protected open space in the Council's own feasibility study, is designated Green Network in LDP2, and falls within LDP2 Policy 17 (Natural Environment) and Policy 4 (Community Facilities), both of which require open space to be protected unless robust evidence justifies its loss. The application represents a significant departure from LDP2 in this respect. Granting permission would directly reduce the Council's own open space provision at the same time as the CAP and Greenspace Strategy commit to protecting and enhancing it.

#### 5. Adaptation and flood risk

The CAP's Adaptation Pathway identifies flooding as the principal climate risk affecting East Dunbartonshire, with the Council's Local Climate Change Impact Profile recording 126 extreme weather events between 2007 and 2022 and flooding affecting every Council service area. Whitegates Park lies within, or immediately adjacent to, an area with a documented flood risk history, contains substantial depths of peat, and was found in 2018 site investigations to present contamination risk and “significant potential for adverse environmental impact.” Developing this site runs contrary to the adaptation and resilience principles set out in the CAP, which favour retaining permeable, vegetated land in flood-prone areas rather than building on it.

#### 6. Procedural transparency

The CAP repeatedly commits the Council to transparent, evidence-based decision-making. The site selection process that led to this application did not apply a scoring matrix, was informed by a feasibility report considered in a closed session of Council and has left unresolved the question of whether the 2018 contamination findings for this site were presented before Members when Whitegates Park was approved as the preferred option in September 2022. This lack of a transparent, auditable weighting of climate, biodiversity and flood-risk criteria against cost and programme factors is itself inconsistent with the standard of decision-making the CAP commits the Council to apply, and undermines confidence that environmental considerations were given proportionate weight in site selection.

For the reasons set out above, I submit that the proposed development is contrary to the Council's own Climate Action Plan 2026-2040, its Greenspace Strategy, and LDP2 Policies 4 and 17, and that the site selection process which underpins the application did not demonstrate the standardised, evidence-based climate and biodiversity assessment that the CAP itself requires of Council decision-making.

I therefore ask that the application be **refused**, or alternatively that determination be deferred pending a transparent, weighted reassessment of site options, (including a tandem or refurbished build at Myrtle Avenue), against climate, biodiversity, flood risk and open space criteria consistent with the CAP, the Greenspace Strategy and LDP2.

I would be grateful if you could confirm receipt of this objection

Kind regards

