

th November 2026

East Dunbartonshire Council

as a whole, I do not consider that the application provides the Council, statutory consultees or the public with sufficiently complete, accurate, consistent and detailed information to enable a robust and properly evidenced decision to be made.

involves significant engineering, remediation and environmental interventions. At the same time, there appear to remain important gaps, inconsistencies and uncertainties within the information submitted, together with statements and conclusions for which the supporting factual or technical evidence is unclear or insufficient.

development, I consider that these matters require resolution before the application can reasonably be determined.

application no longer appears adequately to reflect the proposal upon which the original consultation was undertaken.

retaining structures, drainage infrastructure, ground treatment and other significant engineering operations. In my view, the description of development does not adequately communicate the scale and significance of these interventions.

consultees have been given a proper opportunity to understand, assess and comment upon the development that is now actually before the Council.

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Where a proposal has evolved to this extent, consultation should provide a clear, transparent and informed basis for participation. I do not consider that this has been adequately demonstrated.

The Council should therefore consider whether the current development is materially different from that originally consulted upon and whether a fresh application and renewed consultation process are now required.

2. Flood risk and watercourses

The proposal involves substantial intervention within or associated with the floodplain, including raised ground levels, elevated sports pitches and extensive retaining structures.

Development would also encroach upon the buffer area associated with a watercourse, while works are proposed affecting existing watercourses and the routing of flows through drainage infrastructure.

I am particularly concerned about whether the cumulative effects of these interventions upon flood storage, flood conveyance and surrounding land have been adequately assessed.

The applicant should be required to provide clear and robust evidence demonstrating that the development will not displace floodwater, adversely alter existing flow paths or increase flood risk elsewhere.

Without that evidence, I do not consider that it has been adequately demonstrated that the flood-risk implications of the development are acceptable.

3. Adequacy of the drainage design

There are significant concerns regarding the proposed drainage strategy.

The submitted information appears to leave important questions regarding the performance of the drainage system during both ordinary and extreme rainfall events, treatment and routing of exceedance flows, predicted flood depths and durations, drainage storage, water quality and the interaction between the proposed drainage infrastructure, sports pitches, floodplain and existing watercourses.

There also appear to be inconsistencies and omissions within the supporting information and questions regarding the assumptions and design criteria upon which elements of the drainage strategy rely.

These are not peripheral matters. They are fundamental to establishing whether the site can be developed without creating unacceptable consequences elsewhere.

I do not consider that the applicant has demonstrated, through sufficiently complete and consistent evidence, that the proposed drainage strategy is robust and capable of managing anticipated conditions without adverse impacts upon surrounding land or watercourses.

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4. Environmental assessment, ground conditions and contamination

The environmental implications of the development also require further scrutiny.

The earlier decision that a full Environmental Impact Assessment was not required was reached before the full extent of the subsequent engineering proposals became apparent. The scale of earthworks, excavation, ground treatment, piling, drainage interventions and works affecting sensitive ground and water environments now raises a legitimate question as to whether the environmental assessment undertaken to date remains adequate for the proposal now before the Council.

Particular consideration should be given to potential effects associated with:

- excavation and dewatering;
- groundwater conditions;
- wetlands and watercourses;
- contaminated ground;
- piling and potential contaminant pathways;
- chemical treatment of ground;
- mobilisation of contaminants;
- imported material and associated ground works;
- changes to drainage and flood behaviour; and
- the cumulative environmental effects of these interventions.

These matters require demonstrable evidence rather than assumption.

Where technical conclusions are relied upon to establish that an environmental risk is acceptable, the underlying evidence and methodology should be clearly identifiable and capable of proper scrutiny by the Council, statutory consultees and the public.

There is not sufficient evidence to nor precedent to support building of this scale and size on ground largely formed of peat.

5. Adequacy and reliability of the evidence base

A fundamental concern is the overall quality and reliability of the information upon which the Council is being asked to determine this application.

In my view, the application does not presently contain sufficiently complete, accurate, consistent and detailed information to provide a robust evidential basis for decision-making.

There appear to be:

- important gaps in information;

- missing or incomplete technical assessments;
- apparent inconsistencies between elements of the submitted material;
- unresolved technical uncertainties; and
- statements or conclusions for which sufficient supporting factual or technical evidence is not readily apparent.

Where a conclusion is fundamental to establishing that the development is acceptable, it should not simply be asserted. The evidence supporting it should be available, current, consistent and capable of scrutiny.

This becomes particularly important where the development has evolved substantially from that originally envisaged and now appears to require materially greater engineering intervention, remediation and environmental mitigation.

Fundamental questions concerning whether the development is technically and environmentally acceptable should be resolved before planning permission is determined, rather than being dependent upon significant further investigation, design development or mitigation afterwards.

6. Overall governance and adequacy of risk assessment

The issues identified above also raise wider concerns regarding the overall governance, risk assessment and technical assurance associated with the development.

Flooding, drainage, contamination, ground conditions, groundwater, watercourses, remediation and engineering requirements should not simply be assessed individually. There needs to be a clear understanding of how these constraints interact and their potential cumulative consequences.

For example, an engineering measure intended to overcome one site constraint should be assessed to determine whether it could create or exacerbate another through displacement of floodwater, alteration of groundwater conditions, mobilisation of contaminants or increased reliance upon engineered drainage infrastructure.

For a project of this scale and complexity, I would expect a clear and auditable evidence trail demonstrating:

- what the principal environmental and engineering risks are;
- how and when those risks were identified;
- how they have been assessed;
- what evidence supports the conclusions reached;
- how interacting and cumulative risks have been considered;
- what remediation and mitigation are required;
- whether those measures are technically deliverable;
- whether their costs have been properly assessed; and
- what residual risks remain.

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The incomplete, inconsistent and apparently unsupported elements of the present information do not, in my view, provide sufficient confidence that these matters have been comprehensively addressed.

7. Reassessment of site selection and options appraisal

Given the extent to which the proposal has changed, I consider that the original site-selection and options-appraisal process should now be revisited.

The preferred site was assessed against alternative locations using the information, assumptions, anticipated environmental impacts, technical requirements and costs understood at that time.

The development now proposed appears materially more complex, involving extensive earthworks, remediation, ground treatment, retaining structures, drainage infrastructure, flood mitigation and other substantial engineering interventions.

There are also significant environmental considerations relating to the floodplain, watercourses, groundwater, wetlands, contamination, drainage and the effects of the proposed remediation and engineering works.

It appears that some of these technical constraints, environmental risks and remediation requirements were either not fully identified, not sufficiently assessed or not appropriately costed at the time of the original site comparison.

If so, this materially affects the assumptions upon which the original evaluation was based.

An options appraisal can only provide a reliable basis for site selection if the alternatives are assessed consistently and on a genuine like-for-like basis, using sufficiently complete and reliable information about their environmental, technical, risk and financial implications.

Where the requirements associated with the preferred site have subsequently changed substantially, the conclusion of the original evaluation should not simply be assumed to remain valid.

The Council should therefore establish whether this site would still emerge as the preferred option if assessed today against the alternative sites using current information and consistent criteria.

That reassessment should include:

- the current scope and design;
- flood risk and floodplain impacts;
- watercourse impacts;
- groundwater, wetland and other environmental implications;
- drainage constraints;

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- ground conditions and contamination;
- remediation and ground-treatment requirements;
- earthworks and imported material;
- retaining structures, piling and associated engineering works;
- environmental mitigation requirements;
- residual environmental and technical risks;
- realistic remediation and mitigation costs;
- realistic whole-project costs; and
- relevant changes affecting the alternative sites.

Without such a reassessment, there is a significant question as to whether the original site-selection process remains a sound and reliable basis for proceeding with what is now a materially different proposal.

8. Exceptional cost and engineering complexity

I am also concerned by the apparently exceptional cost associated with the current proposal, particularly if the cost is substantially inconsistent with genuinely comparable projects.

I recognise that cost alone is not ordinarily a basis upon which planning permission should be refused. My concern is what that level of expenditure may indicate about the underlying constraints, complexity and deliverability of this particular site.

If a substantial proportion of the increased cost results from remediation, earthworks, ground treatment, drainage infrastructure, flood mitigation, retaining structures, piling or other interventions necessary to make the site capable of accommodating the development, those costs provide an important indication of the scale of the site's constraints.

Any comparison with other projects should be undertaken on an evidenced and genuinely like-for-like basis. However, if such analysis confirms an exceptional divergence in cost, the reasons for that divergence should be transparently explained.

This is particularly important if remediation and other technically necessary works have not yet been completely defined or appropriately costed. In those circumstances, there is a further question as to whether the full engineering requirements, environmental consequences, risks and ultimate cost of developing this site are yet properly understood.

9. Adequacy of information before determination

Taken together, these matters lead to what I consider to be the central issue with the application:

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There is not presently sufficient accurate, complete, consistent and detailed information before the Council to enable a robust and properly evidenced determination of the proposal.

The Council should be satisfied before determination that:

- material gaps in information have been addressed;
- inconsistencies between documents have been reconciled;
- technical and factual assertions are properly evidenced;
- environmental effects have been comprehensively assessed;
- flood and drainage implications have been reliably established;
- remediation requirements have been properly defined;
- interacting and cumulative risks have been evaluated;
- statutory consultees have considered the current rather than superseded proposal;
- the implications of the current engineering solution are properly understood; and
- the public has had a fair opportunity to scrutinise and comment upon the development actually proposed.

These are matters that go to the fundamental acceptability of the development. They should not be resolved by assumption or deferred until after permission has been granted.

Conclusion

My objection is therefore not based upon one isolated technical issue.

It concerns the cumulative picture presented by the application: a substantially changed and increasingly complex proposal; significant flood, drainage, environmental, ground and contamination constraints; extensive remediation and engineering intervention; apparent gaps and inconsistencies within the supporting information; technical assertions that require clearer evidential support; and an exceptional level of cost which appears to warrant further examination of the constraints and interventions associated with the site.

These matters also call into question whether the original site-selection exercise remains a reliable basis for proceeding. If material environmental constraints, remediation requirements, engineering complexity, risks and costs were not known or adequately reflected when the alternatives were originally compared, the preferred site should be reassessed against those alternatives using the information now available and on a consistent, like-for-like basis.

For a development of this scale, complexity and environmental sensitivity, the Council should have a complete, accurate, coherent, consistent and demonstrably evidence-based assessment before making an irreversible planning decision.

On the information presently available, I do not consider that threshold has been met.

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Alternatively, given the extent of the changes and the apparent deficiencies and

uncertainties within the supporting information, the Council should require a fresh application, a reassessment of the site against the alternative locations, and a renewed consultation process based upon complete and current technical and environmental information before any determination is made.

in the determination of the application. I would also be grateful to be kept informed of the progress of the application.

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