

Point	What the report / evidence says	The problem to be addressed by the case officer	The criticism
1	(Salami Slicing) Admits compliance with LDP2 Policy 13 "would be dependent on the assessment of that planning application [Myrtle 1 Avenue]."	This is a written confession of Unlawful Project Splitting. Application A cannot legally depend on an unsecured Application B.	The criticism You cannot lawfully grant "No Objections" if compliance relies on a separate, unsecured application. If Myrtle Ave is refused or loses funding, the Council is in admitted breach of Policy 13.
2	(Parkland Deficit) Cites the Draft Atkins Realis Audit showing Lenzie has a current deficit of -2.41 Hectares for "Parks and Gardens."	NPF4 Policy 20 dictates development must "not result in or exacerbate a deficit" in green infrastructure.	Your own Policy Team's data proves a 2.41ha deficit exists. By destroying Whitegates (5.45ha), you actively exacerbate this deficit, violating NPF4 Policy 20.
3	(Water Cover-up) Demands "no pollution to any waterbody or ground water resource" (LDP2 Policy 18).	Ignores the Phase 2 data showing 1400mg/kg Lead and NAPL, and the Causeway Flow data showing Node S25 overspilling 721.8m ³ .	How can the Case Officer rely on a Policy Response demanding 'no pollution' when the applicant's engineering blueprints actively design a 721,800-litre toxic flush into the Bothlin Burn?
4	(Carbon Contradiction) Notes NPF4 Policy 5 requires peat impacts and 4 carbon sequestration profiling to "take the peat into account."	The Policy Team ticked "No Objections" without actually seeing the carbon calculations for digging up 50,000m ³ of 53% TOC peat.	Where is the Lifecycle Greenhouse Gas Assessment for excavating the peat bog? You cannot recommend approval while deliberately hiding the carbon emissions generated by building the SUDS.
5	(TPO Impossibility) Highlights the Tree Preservation Order (TPO), prohibiting the uprooting or wilful damage of trees.	The Council's drainage policies forbid pipes within 3m of trees. Digging a site-wide shallow SUDS network will sever the TPO root zones.	The developer cannot legally excavate the root protection zones of TPO woodland to install the required attenuation crates without committing an offence under the TPO.
6	(Transport Illusion) Admits the nearest regular bus stop is 570m away and the train station is a 30-minute walk.	NPF4 P13 & LDP2 P11 require sustainable transport. With 41% out-of-catchment pupils, this site guarantees heavy car reliance.	The Policy Team's claim of 'sustainable transport' is a fiction. Approving this site guarantees severe traffic displacement and gridlock on Middlemuir Road and Woodside Road
7	(Passivhaus Hypocrisy) Praises the "Passivhaus" design as a commitment to climate change mitigation.	Operational energy efficiency is irrelevant if construction triggers a massive carbon bomb from exposing degraded peat.	The operational energy savings of a Passivhaus do not legally offset the catastrophic, immediate release of greenhouse gases caused by the required earthworks.
8	(Infiltration Paradox) Demands "porous surfaces" and "raingardens" to minimize surface water run-off.	The DQRA toxicological safety strategy relies on sealing 75% of the site under an impermeable concrete cap to trap the Lead/NAPL.	The environmental safety strategy (impermeable cap) and the drainage policy (porous infiltration) are mutually exclusive. The developer cannot lawfully comply with both.
9	(Not Brownfield Confession) Explicitly states: "In terms of the location, the site is not brownfield land..."	NPF4 Policy 9 dictates a strict "Brownfield First" approach, prioritizing previously developed land over open space.	The Applicant's dismissal of the brownfield alternative (Myrtle Ave) is legally unsound when their own Policy Team confirms they are violating the 'Brownfield First' hierarchy.
10	(Scheduled Monument) Notes the canal feeder is a Scheduled Monument and must be preserved in situ.	Ignores the geotechnical threat. The Phase 2 report warns that dewatering the peat can cause "excessive settlement" on adjacent sites.	The Case Officer cannot recommend approval without proof that massive dewatering for the SUDS tanks will not cause structural subsidence to a statutorily protected monument.
11	(Shrink the Car Park) Suggests "reducing the number of [parking] spaces" to mitigate the loss of TPO trees.	Reducing parking for a 1,400-pupil school with a 41% commuter intake guarantees traffic gridlock. SUDS tanks are also under the car park.	A written admission of gross overdevelopment. The site is geometrically too small to lawfully accommodate the school, the required parking, and the statutory tree protections.
12	(Green vs Grey) States a strict preference for "green" infrastructure (raingardens) over "grey" infrastructure.	The toxicity of the site forces the developer to use massive "grey" plastic geocellular crates to prevent leaching.	The applicant, has finalized engineering design directly contravenes the Policy Team has stated requirement for green infrastructure.
13	(Greenfield Run-off) Requires the development to achieve "greenfield run-off rates."	The developer manipulated the baseline (1-Hectare Trick) and their system bypasses flow controls to dump 721.8m ³ of unattenuated water.	The Case Officer is legally barred from accepting this conclusion when the raw engineering data proves the site will dump unattenuated floodwater into neighboring properties. Curtains "hidden text" admits this.
14	(NPF4 Evasion) States the response focuses on LDP2 and leaves the 14 assessment of NPF4 to others.	NPF4 is statutory law and supersedes LDP2. Checking "No Objections" without auditing national law makes the consultation void.	A 'No Objections' verdict that fails to comprehensively audit the application against NPF4 Policies 5, 22, and 23 is legally incompetent.
15	(Local Place Plan) Quotes the Lenzie Local Place Plan requiring a "traffic-free Walkway-Cycleway."	Building a 4-storey school, sports pitches, and a high-volume car park obliterates the traffic-free community vision.	To conclude 'No Objections' to a "£138m heavy infrastructure project that destroys the community's statutory Local Place Plan is an exercise in profound cognitive dissonance.
16	(Transport Ban) Quotes Policy 11 stating sites "will not be supported" without public transport within 400m.	The author immediately admits the nearest regular bus is 570m away, proving a black-and-white policy breach.	The Case Officer cannot lawfully recommend approval when the Applicant's own internal consultation confirms a breach of a prohibitive transport policy.
17	(Economic Double Standard) Excuses the developer from a green heat network because it is "not economically viable."	The Council uses "viability" to dodge green policies, but ignores the "£4.8m hazardous waste liability required to build on Whitegates.	It is Wednesbury Unreasonable to use economic viability to bypass LDP2 Policy 9, while ignoring the massive, uncosted waste liabilities required to force this site through.
18	(Exceptional Circumstances) Policy 19 forbids adverse effects on Scheduled Monuments without "exceptional circumstances."	Dewatering the peat threatens the canal feeder. Because Myrtle Ave is a viable alternative, there are no "exceptional circumstances."	Because the Council has viable alternative sites, there are zero 'exceptional circumstances' to justify risking this Scheduled Monument.
19	(Backloading Carbon) Acknowledges that carbon emissions from peat and felling trees "should be taken into account."	Ticking "No Objections" without seeing this calculation is unlawful backloading (Lomond Banks precedent).	The Case Officer cannot rely on a 'No Objections' response that unlawfully backloads critical NPF4 Policy 2 carbon calculations to a later date.
20	(Hydrological Damage to TPO) Notes the TPO prohibits the "wilful damage" of protected trees.	Digging massive SUDS tanks, contrary to EDC own published policy as previously advised, and altering drainage will starve or drown the root systems of the retained trees.	Engineering a site layout that inadvertently kills retained trees via hydrological starvation constitutes 'wilful damage', breaching Policy 17.
21	(Health & Wellbeing) Requires the development to "improve... health and wellbeing" (LDP2 Policy 1).	Ignores the DQRA manipulation that left "£4.8m of Category 1 carcinogens capped directly under a flood-prone playground.	Leaving toxic waste under a cap that is geometrically guaranteed to be breached by surface water flooding is the antithesis of improving health and wellbeing.
22	(Ecological Quality) Demands green infrastructure improves the "ecological quality of watercourses" (LDP2 Policy 10).	Node S25 overflows 721.8m ³ of toxic floodwater overland, bypassing ecological filter layers and flushing into the Bothlin Burn.	This engineered pollution pathway actively degrades the ecology of the Bothlin Burn. The drainage blueprints are in direct breach of Policy 10.
23	(Unrestricted Access) Requires compensatory open space to provide "unrestricted access for the public."	Myrtle Ave mitigation relies on school 3G pitches, which must be fenced and locked during school hours for safeguarding.	It is operationally impossible to offer unrestricted public access to a school sports hub. The proposed mitigation permanently fails LDP2 Policy 13.
24	(Active Travel Safety) Praises the integration with the Strathkelvin Railway Walkway for sustainable travel.	Fails to assess the inhalation hazard of funneling pedestrians past a site undergoing massive excavations of toxic ash and asbestos.	You cannot prioritize 'active travel' while simultaneously exposing pedestrians to aerosolized toxic dust during a multi-year construction phase.
25	(Evasion of P23 Health) Lists NPF4 Policy 23 (Health and Safety) as relevant, but explicitly defers assessing it.	Ticking "No Objections" without auditing the single most critical national safety law regarding contaminated land is negligence.	A 'No Objections' determination issued without a comprehensive audit of the site, "£4.8m toxic waste liability against statutory safety laws is procedurally void.
26	(No-Dig Contradiction) Suggests "no-dig construction" as a mitigation for the Scheduled Monument.	The SUDS strategy requires digging 50,000m ³ of earth and deep dewatering. "No-dig" is physically impossible.	The Case Officer cannot rely on a policy response that assumes 'no-dig' construction on a site engineered for massive 'cut and fill' earthworks.
27	(No Net Loss Impossibility) Demands "no net loss of biodiversity" and "habitat enhancement."	The DQRA toxicological safety strategy mathematically requires 75% of the site to be permanently sealed under an impermeable concrete/tarmac cap.	The Case Officer must explain how sealing 75% of a green space under concrete and artificial 3G turf achieves 'no net loss of biodiversity.'
28	(Periphery Flooding) Minimizes surface water flooding by claiming it is limited to the "periphery" of the site.	The FRA dictates a 1.6-metre land raise to lift the building out of a functional floodplain, displacing 7,200m ³ of water.	A 'No Objections' verdict based on a fundamental misreading of the site's severe hydrological risks is a failure of the Duty of Inquiry.
29	(Backloading Peat Plan) States a peatland management plan "may be required to establish the likely effects."	Unlawfully defers establishing the fundamental environmental effects of the project until after approval.	Under the Lomond Banks Ministerial Decision, a planning authority cannot lawfully grant consent if the fundamental effects of the development remain unestablished.
30	(Typology Deficit) Emphasizes the need to match the "typology" of the 30 lost open space.	Whitegates is an unrestricted natural park; Myrtle Ave will be fenced 3G sports pitches. This alters the typology.	Replacing a natural ecosystem with fenced plastic turf does not satisfy the 'enhanced facilities' test required by LDP2 Policy 13.
31	(Peat Consideration Loophole) Claims NPF4 Policy 5 requires that impacts on peat "must be given consideration."	NPF4 Policy 5 mandates a strict presumption against development on peat, not merely a "consideration."	By advising the Case Officer that the applicant simply needs to "take the peat into account", the Policy Team has issued legally incompetent advice diluting national law.
32	(Urban Cooling Paradox) Requires the development to provide "urban cooling" (LDP2 Policy 9).	The DQRA mandates sealing 75% of the site under concrete/tarmac to trap the Lead, creating a massive urban heat island.	The Policy Team's environmental demands (urban cooling) and the developer's toxicological safety requirements (concrete capping) are mutually exclusive.
33	(Playing Field Misclassification) Misclassifies the natural park as a "playing field" to soften the protection status.	Under NPF4, a "playing field" can be swapped for a synthetic pitch; "natural open space" cannot be easily substituted.	The Council cannot lawfully mitigate the destruction of a biodiverse natural park by offering locked, artificial 3G sports pitches.
34	(Incomplete Policy Advice) Concludes by explicitly stating that policy advice is incomplete pending the Myrtle Ave application.	Ticking the formal "No Objections" box while openly admitting the policy assessment is "To Be Determined" is a procedural failure.	This is documentary proof of unlawful project splitting. A Case Officer cannot recommend approval based on an incomplete internal consultation.
35	(Embodied Carbon Distraction) Praises the "Passivhaus" design's operational energy savings.	Completely ignores the immediate, catastrophic Embodied Carbon footprint of excavating 50,000m ³ of 53% TOC degraded peat.	The operational energy savings of a Passivhaus do not legally offset the carbon destruction of a peat bog under NPF4 Policy 2., ignores EDC's own carbon plan.