

	Objection or area of objection	why it demonstrates procedural unfairness or predetermination, and renders TP/ED/26/0341	Relevant Legislation or Guidance
Sent 29 June 26	583 Post Kaya FRA for Myrtle		
Sent 29 June 26	584 Procedural Impropriety: Written Proof of Unlawful Project Splitting.	The applicant has repeatedly claimed that Myrtle Avenue and Whitegates Park are independent applications, utilizing this to avoid a cumulative EIA. However, the applicant's own Flood Risk Assessment (Kaya Consulting, TP_ED_26_0341-PL44, Pg 1) explicitly admits that the Myrtle Avenue works are "required in association with the proposed new secondary school at Whitegates Park." This confirms functional interdependence. Assessing them separately constitutes unlawful "salami-slicing" to evade cumulative environmental scrutiny.	EIA (Scotland) Regulations 2017: Requirement to assess the "cumulation of effects with other existing and/or approved projects."
Sent 29 June 26	585 Flawed Methodology: Lack of Independent Modelling.	The Stage 1 FRA for Myrtle Avenue admits no detailed hydraulic modelling was undertaken. Instead, the consultant relied entirely on surface water plans "previously provided by East Dunbartonshire Council" to rule out flood risk from Lenzie Moss. For a Planning Authority acting as its own developer, relying on unverified internal maps rather than independent hydraulic modelling fails the legal test of objective, anxious scrutiny required to satisfy NPF4.	NPF4 Policy 22: (Flood Risk).
Sent 29 June 26	586 Flawed Methodology: Lack of Independent Modelling.	The Stage 1 FRA for Myrtle Avenue admits no detailed hydraulic modelling was undertaken. Instead, the consultant relied entirely on surface water plans "previously provided by East Dunbartonshire Council" to rule out flood risk from Lenzie Moss. For a Planning Authority acting as its own developer, relying on unverified internal maps rather than independent hydraulic modelling fails the legal test of objective, anxious scrutiny required to satisfy NPF4.	Regulation 65 (EIA Regs): Duty to ensure objective assessment and avoid conflict of interest.