

Objection or area of objection	Why it matters, why it is a material consideration and why it is an objection to TP/ED/26/0104 OR why it demonstrates procedural unfairness or predetermination, and renders TP/ED/26/0104 unlawful	Relevant Legislation or Guidance
Fatal flaw in Flood Risk Assessment (FRA) - Omission of the 1982 Biological Water Pump	The applicant's FRA and Drainage Strategy mathematically treat the site as a static 'greenfield.' This is a fatal omission. Council records prove 2,000 mature trees were planted in 1982, including 1,192 high-capacity wetland species (Alder and Willow). Catchment-scale eco-hydrology proves this mature woodland removes 15 to 24 million litres of net annual evapotranspiration. By clear-felling this TPO woodland, the applicant eliminates a massive biological water pump. The FRA is mathematically void because it entirely ignores the severe 'Groundwater Rebound' (estimated at 10cm to 30cm+ across the already saturated site) that will occur when this biological drainage system is destroyed."	NPF4 Policy 22 (Flood Risk) / SEPA Technical Flood Risk Guidance
Structural Failure of Drainage Strategy - "Hydrostatic Heave" vs. "Subsidence"	The applicant's Drainage Strategy (Table 2) explicitly rules out SuDS infiltration due to saturated peat and toxic contamination, setting the infiltration coefficient to 0.00000 m/hr. This means the underground plastic SuDS crates must be wrapped in an impermeable geomembrane. Because the clear-felling of the woodland will trigger "groundwater rebound" into the shallow peat, these sealed, hollow plastic crates will be subjected to massive upward hydrostatic pressure. To prevent 'Hydrostatic Heave' (the tanks floating to the surface and destroying the pitches), thousands of tonnes of concrete ballast must be used. However, applying dead-weight ballast to a 4.8m peat bog guarantees severe differential settlement, snapping the drainage pipes. The applicant has engineered a drainage system that must literally "either float or sink."	CIRIA C753 (The SuDS Manual) / Building (Scotland) Regulations 2004 - Mandatory Standard 3.6 (Surface Water Drainage)
Drainage Strategy Failure - The "Bathtub" Submerged SuDS Collisio	Whitegates Park is a topographical bowl fed by lateral groundwater. By removing the trees (stopping transpiration) and capping 5.25 hectares (75%, though various figures have been used by the consultants) of the site with impermeable surfaces (stopping surface evaporation), the lateral groundwater will remain permanently trapped directly beneath the surface. The applicant proposes to funnel hyper-accelerated surface runoff from the 75% cap into underground SuDS crates. However, because the water table will have rebounded due to the tree loss, the zone where these crates sit will be inundated. The system will attempt to shove accelerated stormwater into a submerged system which may have close to zero capacity".	NPF4 Policy 22 (c)(i) "Development proposals will not increase the risk of surface water flooding to others."
Material error of fact in Drainage Strateg	The applicant's submitted Drainage Strategy (Table 1 and Table 3) explicitly claims its environmental and amenity criteria rely on the 'preservation of existing trees' and 'minimising disruption to habitat.' This is a material error of fact and a work of fiction. The architectural layout requires the mass clear-felling of the 2,000-tree TPO woodland. (EDC admit to the loss of 81% of class A trees). The Case Officer cannot lawfully accept a Drainage Strategy whose foundational biodiversity and amenity mitigation claims are in direct, undeniable contradiction with the applicant's own felling plan.	Town and Country Planning (Scotland) Act 1997 / NPF4 Policy 6 (Forestry, Woodland and Trees)
Loss of Shelterbelt & Microclimate Degr:	Material Consideration: Felling 98 mature trees removes a critical natural wind barrier. Replacing this porous shelterbelt with a 4-storey solid building on a raised platform will create severe "downwash" and wind-tunneling effects, directing accelerated, turbulent winds directly into the low-lying Larkfield properties.	NPF4 Policy 14 (Design, Quality & Place - Microclimate Amenity)
Loss of Shelterbelt & Microclimate Degr:	Procedural Unfairness / Criticism: The applicant has failed to submit a Wind Microclimate Assessment. Assessing a major 4-storey development without modelling how the loss of the woodland barrier will impact the wind exposure, structural safety, and thermal comfort of adjacent residential properties represents a failure to protect residential amenity.	NPF4 Policy 6 (Loss of Ecosystem Services)
Loss of Shelterbelt & Microclimate Degr:	Procedural Unfairness / Criticism: The applicant has failed to submit a Wind Microclimate Assessment. Assessing a major 4-storey development without modelling how the loss of the woodland barrier will impact the wind exposure, structural safety, and thermal comfort of adjacent residential properties represents a failure to protect residential amenity.	LDP2 Policy 17