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9 January, 2013

Dear Mrs Young,

**Erection of 271 houses with associated infrastructure open space and landscaping (12/00830FULM)**

We wish to object to this application as it is contrary to both the current local plan and the Proposed Dundee Local Development Plan 2012.

In the current plan, the Linlathen site is not designated for greenfield housing and the quota for such houses has been fully allocated. In the proposed plan, guided by the Tayplan Strategic Development Plan 2012-2032, the Dundee planning authority suggested a new allocation of 385 houses on greenfield land of which 150 should be located at Linlathen, Broughty Ferry. In addition it was suggested that there should be no building on this site until 2020-2024.

This application exceeds the suggested Linlathen allocation by more than 80%. Consequently it could deprive other greenfield sites of their allocation. . The developer's argument that there are unique employment and council tax benefits associated with building on the Linlathen site is specious, since similar benefits would be achieved irrespective of wherever the 385 greenfield houses were located in Dundee.

Furthermore, the developer wants jump the queue and have the application determined immediately. This is based on the spurious argument that the east end of Dundee desperately needs more greenfield estate houses. This is at a time when the number of housing transactions is at a historic low due to the lack of credit.

We have already objected to the council's suggestion (in the proposed plan) that 150 houses should be built at Linlathen because of the following.

1. Flood risk (SEPA's concerns are noted)
2. Sewage capacity
3. Inadequate safe access (cars, service vehicles, public transport, pedestrians, cyclists).
4. A high level of car dependency which the planning authority is trying to reduce.
5. No convenient shops or communal facilities (schools, health provision)
6. Reduction in food-producing agricultural land
7. The lack of clear natural boundaries will encourage 'urban creep'.

Obviously, increasing the council's proposed allocation by more than 80% greatly magnifies these concerns.

We note that in their application that the developer considers the new proposed plan to be a material consideration (even to the extent of calling it an 'approved' plan in the Design Statement (Document 40), Planning Policy (Paragraph 2.5). We will also refer to the proposed plan as a material consideration where appropriate.

Our more specific concerns relate to the following.

### **A) Location**

As the most northerly of the housing estates north of the Arbroath Road (A92), the Linlathen estate would be even further away from the important services and facilities of central Broughty Ferry. As there are no such services/facilities readily available north of the A92, there will be an even greater dependency on car usage.

This goes against one of the main themes of the proposed plan which is to restrain/minimise the use of the private motor car (Paragraph 10.1, Policy 53, Policy 54).

Another problem with the location is the 'barrier' of the A92, a busy dual carriageway which impedes safe access to the main services of Broughty Ferry. This is particularly important regarding access to school provision. Parents will be more likely to take their children to nursery/primary/secondary school by car and so exacerbate traffic problems. These problems will also be associated with the need to access shops and health-care facilities.

We would suggest that it is no longer responsible to keep on adding just houses to the north of the A92 without including the necessary community facilities. Provisional plan Policies 16, 17 and 27(2) would seem relevant in this regard. .

### **B) Design**

The quality of design is disappointing and seems a throwback to a previous generation.

The current local plan specifies that individual greenfield housing should have boundaries formed of stone walls and beech hedging. This was done to introduce an element of local character and identity into housing estates. This has had some success with the nearby modern housing estates. Clearwater Park, the most recent of these estates, has taken this further and introduced natural slate and stone in the structure along with elements of typical Scottish vernacular architecture in the design of houses. The design of the, as yet unbuilt, supported living accommodation development has also followed this trend.

The proposed local plan is keen to reinforce the improvement in local design relevance and quality (Paragraph 6.3 “to reflect local character and context” and Policy 7).

If one now turns to the design of the proposed houses, they seem to be bog standard estate houses that could be built anywhere in the UK. A clue is given in the Design Statement under “House Type and Variety” Paragraph 4.3, where the phrase “A selection of standard Taylor Wimpey elevations are shown....” appears; and Paragraph 4.6 headed “Bett Homes Standard Principal Elevations”.

This impression is reinforced by the materials proposed (dry-dash render, reconstituted stone sills, concrete tile roofs and UPVC windows). Not much of a nod to local character. Furthermore, there is no clear indication that there is going to be any of the required beech/stone boundary treatment.

It is unacceptable that that the proposed housing is inferior in design and character to that which already exists in estates north of the A92.

We note that there is the following comment in the “House Type and Variety” (Paragraph 4.1) section.

“As experienced housing developers our clients have genuine insight into current and future trends and desires in the housing market. This has led to a varied mix of homes being proposed on the site, some of which are justifiably below the requirements stated in the plan, both in floor area and garden size”

We are concerned that any further deviation from the current local plan will result in an additional reduction in quality.

### **C) Flood Risk**

This is a concern in view of the increase in adverse weather events (particularly with extreme periods of heavy rainfall).

We consider it important that experts from the council and SEPA assess flood risk independently of the developer’s assessor.

We want to be convinced that new and existing properties (along with related insurance premiums) will not be exposed to an additional flood risk.

We note that a hint of trouble is mentioned as follows in the Flood Risk and Drainage Impact Assessment Report (Document 39), Paragraph 3.32 (in the section dealing with Overland Flows and Surface Water Ponding)

“Further, it is recommended that finished floor levels of plots which are associated with these overland flow rates should be elevated above surrounding garden levels to provide

a drainage pathway from the properties should the unlikely possibility of overland flow arise.” There seems to be a suggestion that some gardens could be flooded.

Included among the rigorous checks required should be the assurance that the outflows from the detention ponds into the Dighty cannot not cause problems in any properties located downstream. (for example, the ground-floor apartments of the listed Balmossie Mill which are already at risk of flooding).

#### **D) Sewage Capacity**

The perceived increase in adverse weather events, particularly in heavier rainfall, mentioned previously is also relevant in this context.

We are concerned that this factor may be causing the existing sewage system to be suffering capacity constraints. And that adding a greater burden on it by building hundreds more houses will exacerbate the situation.

We are worried that more frequent releases of more concentrated sewage will cause a deterioration in the quality of Broughty Ferry’s bathing waters. Obviously, maintaining this quality is important for Dundee both in economic and leisure terms.

An example of an occurrence that adds to the perception that the sewage system is struggling is the regular pluvial flooding that occurs at the Cedar Road/Forthill Road junction in Broughty Ferry (see the attached recent photo).

When the waters subside the road is littered with sewage related items. Furthermore, it appears that such repeated events are damaging nearby kerbs, pavements and road surfaces as well as causing run-off flooding in nearby gardens.

An indication that the council, until recently, has not been fully aware of such problems is evidenced by the council’s Flood Prevention Report 2009 (7<sup>th</sup> Biennial Report). In Appendix 2 (Flood Risk locations Out of Sewer Flooding), the Cedar/Forthill Road junction is not included in the 36 locations listed.

We consider it important that we are given a cast iron guarantee from Scottish Water, SEPA and the council that the proposed development will not add to the current sewer capacity problems.

#### **E) Policy 19. Funding of On and Off site Infrastructure.**

This policy in the proposed local plan seeks to secure funding towards provisions required as a result of a development. In its submission the developer has hinted that it may enter into a legal agreement to contribute to such provisions.

We would suggest that since this development proposes to add hundreds of houses to the area north of the A92 that is already 100% houses, contributions towards some of the following would be appropriate.

1. Nursery/primary school premises north of the A92
2. A health centre north of the A92
3. Convenience shops north of the A92
4. Establishment of a school bus service
5. Establishment of a regular bus service to circulate through the 4 estates and then access central Broughty Ferry.

#### **F) Other Issues**

We are concerned that it is proposed to destroy a number of protected trees (TPO 07/1984 West Pitkerro).

We consider that any currently existing stone structures owned by the landowner (both within and adjacent to the site) should be retained and restored, to help to maintain an element of local character.

Yours sincerely,

D.S. Hewick [Planning Secretary, Broughty Ferry Community Council]