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28 February, 2014

Dear Mr Macari,

**Demolition of listed building to erect a new 10-flatted development/ 383  
Brook Street Broughty Ferry DD5 2DS (14/00105/FULL)**

This is another proposal by this applicant (now called Strathmor Ltd, an estate management business) to demolish a Category C-listed cottage and replace it with a block of flats (previous reference 12/00839/FULL, 12/00840/LBC). This time, the number of flats has been reduced from 16 to 10, and an attempt has been made to improve the design.

We wish to object to both the planning application and the demolition of the listed building (indicated in the title) even though no listed building application has been submitted. We will therefore object on both planning and environmental/conservation grounds

The Site Area

The listed cottage and garden is at the NW corner of a busy junction of Brook Street and St Vincent Street. At the NE corner there is another C-listed cottage, while at the SE corner there is a C-listed. funeral home (formerly St Aidan's Church Hall). The cottages were listed in 1991 while the 'Hall' was only listed in 2007. All the listed buildings are single storey.

The SW corner is occupied by the northern section of St Vincent Court (a sheltered housing complex). This section is 3-storeys in height and constructed in artificial stone with a concrete tiled roof. St Vincent Court was built 20 years ago and is on the site of the former premises of Harry Lawson's haulage business which was essentially a contaminated brownfield site. Although the development was considered an improvement at the time, the quality would not now be considered adequate for what is likely to become a conservation area.

Planning Issues

The proposed development (comprising a large component of artificial stone), which has been changed from a 4-storey flat roofed structure to a 3-storey one (but with pitched

roofs) is still higher than the 3-storey part of St Vincent's Court on the SW corner and therefore is much higher than the traditional listed buildings on the other corners as well as the neighbouring 1 1/2-storey houses on the north of Brook Street.

Overall, it is considered that the scale and massing of the development is excessive and inappropriate, and fails to comply with a number of requirements of Policy 7 (High Quality Design) of the Dundee Local Development Plan 2014.

Specifically, these particularly relate to design criteria 1, 2, 3, and 5 as indicated in the extract of Policy 7 reproduced below.

“All proposals should also meet the following design criteria:

- (1) consider and respect site topography and any surrounding important landmarks, views or skylines.
- (2) contribute to a sense of identity by developing a coherent structure of streets, spaces, and buildings that are safely accessible, respecting existing building lines where appropriate.
- (3) the design should complement its surroundings in terms of appearance, height, scale, massing, materials, finishes and colours.
- (4) all buildings, streets, and spaces (including green spaces) should create safe, accessible, inclusive places for people, which are easily navigable, particularly on foot, bicycle and public transport and designed with future adaptability in mind.
- (5) existing buildings, structures and natural features that contribute to the local townscape should be retained and sensitively integrated into proposals.”

The development also fails to comply with aspects of Appendix 3 (Design of New Housing) in the local plan.

This directs that new flats are not encouraged in Central Broughty Ferry. There is no planning brief, which indicates that there are no site-specific circumstances which “demand a flatted solution”

The provision of 12 car parking spaces for 10 private flats is below the requirement for 130% parking provision. It is conceivable that this provision should be increased in light of the limited nearby on-street parking nearby.

The increase in residential units from one to 10 will result in a large increase in car usage which will exacerbate safety, congestion and parking problems associated with a very busy junction

The provision of amenity/garden ground/drying area looks inadequate. There is a corner of 100 sqm of amenity space/drying area combined which has to be inconveniently accessed via the car park. Four first and second floor flats on the corner location have shared balconies (not attractive visually if used for drying), while the two ground floor

corner flats have “amenity space” leading straight to the pavement. Other flats have no balconies, or balconies that are merely accesses to external stairs/fire escapes.

We would be grateful if it could be checked that all the flats have “a minimum gross internal floor area of 60 sqm.”

The height of the development requires that there should be checks for unacceptable degrees of overlooking and overshadowing.

The applicant indicates on the application form that the site is at no risk of flooding. However, in the past there has been flooding on this site. There may have been drainage improvements since, but obviously, cementing over nearly all the large garden area will increase the risk of pluvial flooding. SUDS are mentioned but no details are given.

### Conservation Issues

The eighteenth century listed cottage is modest in appearance but it should not be demolished. It is an important surviving example of local vernacular domestic architecture. Its appearance seems essentially unchanged from when it was listed in 1991. It was listed in spite of the unflattering later added dry-dash render.

The three low-level listed buildings at the three corners of the Brook Street/St Vincent Street junction are complementary and the arrangement should not be broken up. It is also important to retain as a group (this was a key factor in the listing decision), the 6 listed cottages at 383, 391, 393, 397 Brook Street, and at 158 and 160 St Vincent Street.

In addition, the development would destroy the important symmetry of the two south facing facades of the listed buildings on the north corners of the Brook Street/St Vincent Street junction (cf Policy 7). This would adversely affect the appearance of one of the main gateways of central Broughty Ferry and its retail core.

I remember when Norma Smith, an Inspector of Historic Buildings for Historic Scotland was inspecting St Aidan’s Church Hall prior to listing the premises in 2007, she remarked on the pleasant ambiance provided by the majority of low level traditional buildings at and near the junction.

It is noted that applicants have been trying to develop the site since at least 2007. Perhaps as a result, the cottage has not been adequately maintained and its condition has been allowed to deteriorate.

There has been no justification for the demolition of a listed building.

We also note that there seems to have been no attempt by the owner to market the cottage as is required in this situation.

It would be an inauspicious start to the extension of Broughty Ferry Conservation Area if one of its first developments resulted in the demolition of a listed building.

Yours sincerely,

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