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20 May, 2016

Dear Mr Gray,

16/00392/FULM | Proposed Residential development comprising of 150 dwelling houses with associated infrastructure, Access, Landscaping , Drainage , SUDS and open space | H71-2 Site At Linlathen Arbroath Road Broughty Ferry Dundee

We wish to object to this proposal. The basic reasons are as follows.

1. It is premature. The current 2014 Local Plan states that there should be no development on the site until 2020-24. This is reinforced in the Main Issues Report for the next local plan which indicates the same start date should be the preferred option.
2. It is a technical overdevelopment. It seeks permission for 150 houses on part of the site, but indicates that it is intended to build at least another 100 houses on the rest of the site (possibly up to a total of around 270 houses). The current plan states a total capacity of 150 houses for the whole H71 site.
3. Like the other housing development north of the A92, this most northerly of the 'estates', is car dependent and has no non-residential component. Clarification is therefore required about the likely availability (and financing) of neighbourhood facilities such as shops, school and primary medical provision (one medical practice in Broughty Ferry has recently announced the restriction of the acceptance of patients residing north of the A92).
4. The proposed huge SUDS area is a development out-with the H71 site and is therefore presumably contrary to the Local Plan. There are concerns that the run-off into the Dighty could cause flooding and pollution problems downstream.

Objections 1 and 3 are linked in that the application vaguely mentions a 'new primary school' and 'neighbourhood facilities' with a hint of a Master Plan. It is suggested that any development on the H71 site is held back (in line with the dates specified in the Local Plan) to allow details of any Master Plan to emerge.

Such a Master Plan will enable more detail of required developer contributions to be established. Some relevant extracts from the Dundee Local Development Plan Supplementary Guidance for Developer Contributions are as follows.

All allocated greenfield housing sites will be required to make a financial contribution towards enhancing primary school provision. Any greenfield housing land release in this area over that allocated will require the provision of a new primary school north of the A92 Arbroath Road. Developer contributions in the form of both land and finance will be required for this new school. In addition, connections for cycling and walking routes to the wider Dundee core path network and green infrastructure will be required.

Primary School Provision:

A number of Primary Schools within Dundee are currently operating at or near capacity. Those under most pressure to accommodate future development are located on the northern and eastern edges of the city. As a result any new significant land release beyond that allocated in the Local Development Plan in the east of the city (North of Arbroath Road) would require the provision of a new primary school. In the north of the City it may be necessary to review the School catchment areas to accommodate future development.

Also relating to the problem of car dependency:

In addition to physical works, there may be occasions where payments are required to support the provision of public transport services. For example, where a development is delivered in phases over an extended period of time it may be necessary to financially support a bus service from the point in time when part of a development is first occupied. The intention would be that such funding would cease when the development has progressed to a scale that a commercially viable bus service is sustainable

The second objection (overdevelopment) requires consideration of a possible conflict in the 2014 Local Plan. In Appendix 2 it is stated that the capacity of H71 is 150 houses. On the other hand, in Appendix 3, it seems that the minimum plot size calculated for ‘Suburban Standards for Houses on sites of 5 or more units’, could allow some 270 houses to be squeezed onto H71. The developer is trying to derive the maximum benefit from this inconsistency and overdevelop the site. It is suggested that a compromise (as in a similar situation with the Western Gateway development) is reached that ensures a more spacious arrangement. There could be more open space, detached garages, and some SUDS.

There are also some factors that should be considered to improve the design of the development. The other new estates nearby (Clearwater Park, Ferryfields and Balmossie) are characterised by an extensive use of natural stone in their boundary treatments. This material should be used to a greater extent in the proposed development. It could reduce later maintenance problems. The flimsy type of iron railings illustrated in the final set of photos in the Design and Access Statement. (Document 36) is not acceptable. This Statement also mentions (‘Site Evolution Scheme Layout 6’) an existing stone dyke. This should be saved and incorporated into the development.

Finally, Document 36 paragraph 3.21 (Building Design and Materials), mentions ‘Building design and materials will be reflective of the scale and contemporary style of Kirkwood rural vernacular house types....’. It should be ensured the design of the houses

reflects a more local traditional vernacular style rather than that of an in-house off-the-peg design. In this way a more appropriate sense-of-place will be established.

Yours sincerely,

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

PS Our previous comments on the Proposal of Application Notice (15/00452/PAN) are attached (as an Appendix) for information. We consider that the comments are still valid as objections.

Appendix

COMMENTS ON THE PROPOSAL OF APPLICATION NOTICE EXHIBITION: 15/00452/PAN LAND AT LINLATHEN, BROUGHTY FERRY

General Introduction

This major development appears contrary to the Dundee Local Development Plan 2014 (Appendix 2, page 73). The proposal for 150 houses is premature in that the land is not scheduled for release until 2020-2024. The delay is to ensure that major greenfield housing development to the west of the city is not inhibited. Apart from this, approval of this application before its allotted time would set a precedent encouraging other developers to 'jump the gun'.

The allocated development land is the most northerly of the sites north of the Arbroath Road. As such it is rather isolated. The nearest recent development is Clearwater View, a proposed supported-living 'village' for the elderly, located to the south. Currently this is a ghost village. It is only half completed and the demand for occupancy has been almost zero. It is possible here also that relative isolation could be a problem.

Consequently, when development on the Linlathen site is finally authorised to go ahead, the issue of sustainability will have to be considered. This is likely to require significant developer contributions/planning gain.

The developer describes the proposal as comprising family homes. This would require creating a community suitable for groups of residents of all ages, ranging from babies to the elderly. Therefore, there should be convenient access to all the facilities required by these groups. It follows that there should not be a requirement for a high degree of car dependency.

Comments on the posters presented

It was a surprise that the 150 houses were confined to about 60% of the site on the western side. The vacant eastern 40% was labelled 'Future Phase of Development'. It is

of concern that just more houses would be crammed in and would vastly exceed the stipulated number of houses for this site in the local plan.

It is also noted that there is a 'Proposed SUDS Infrastructure' located outside the site. Presumably this is contrary to the local plan.

The poster illustrating the proposed houses (the majority of which are to be detached) showed 4 and 5 bedroomed versions with integral garages. The design seemed similar to that of the Ferryfield houses, namely standard housing estate design.

The proposal is a disappointment for the following reasons.

1. It is premature
2. It is unsatisfactorily incomplete in that there is no indication as to what is proposed for a large part of the site.
3. It is likely to be an overdevelopment
4. No provision for communal facilities was indicated for the future residents (unless these are to be provided in the currently vacant part of the site!).
5. Consequently, it will be almost completely car dependent.
6. The houses are to be of a standard design that can be seen all over the UK. There should be a greater attempt to interpret the traditional vernacular style to retain a sense of local identity, also using traditional materials where possible.
7. There was no information about the boundary treatments. These should be of the traditional design adopted by the other modern housing estates north of the Arbroath Road.

We would therefore strongly oppose the proposed development.

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8 July, 2015