Dear DCC Planning Team,  
  
I am writing to you to object to the planning application 21/00057/FULL, for the change of use from vacant ground to hot food takeaway/drive-thru with associated car parking at Land To East Of Fulton Road And West Of Myrekirk Road, Dundee.

The applicant already submitted 19/00175/FULL for a hot food/takeaway with car parking which was approved by committee in June 2019, but crucially this previous application did not include a drive-through lane, which would be detrimental to the city in a number of ways:

The proposal is contrary to Policy 1: High Quality Design and Placemaking, which states that:  
“ All development proposals should follow a design-led approach to sustainable, high quality placemaking. Development should contribute positively to the quality of the surrounding built and natural environment and should be planned and designed with reference to climate change mitigation and adaptation. The design and siting of development should respect the character and amenity of the place, create a sense of community and identity, enhance connectivity and incorporate creative approaches to urban design, landscaping and green infrastructure, appropriate to the local context and the scale and nature of the development.”

The development is simply a box in a car park next to a major road. Little imagination has been used to create a positive impact to the surrounding environment. There is no reference to climate change mitigation and adaption – in fact, drive throughs and edge-of-town developments simply serve to encourage driving for unnecessarily short journeys whilst increasing pollution and taking trade away from centres of communities such as the city and district centres. There is also no attempt to include renewable energies into the development. There is no sense of community and identity being created here – there are, for example, no seats at all for people to congregate, relax and socialise. Surely if there is to be a new amenity built here, the local community would possibly like to sit and eat in, or sit outside? There is also an incredibly busy road adjacent – the design ought to take this into account and make significant effort (not just the planting of a few trees) to completely shield any such seating areas from this.

This design contravenes Policy 1 and that the application should be rejected on these grounds; the applicant will need to submit a considerably altered design which genuinely takes into account Policy 1 and all of the six qualities of successful place.

Next, yet another development on an edge-of town retail park (designed almost solely for car access) directly contravenes Local Development Policy 21: Town Centre First Principle, which states:

"All new or expanded uses that will generate significant footfall should be located in the City Centre or a District Centre. Proposals for such uses in other locations will only be acceptable where it can be established that:

1) no suitable site is available, in the first instance, within the City Centre or District Centres then, edge of town centre and then, Commercial Centres identified in the Local Development Plan, and then out-of-centre locations that are, or can be, made easily accessible by a choice of transport modes;

2) individually or cumulatively the proposal would not have a significant adverse effect on the vitality or viability of the City Centre, District Centres or Commercial Centres; and

3) the proposal would address a deficiency in provision which cannot be met within or on the edge of these centres. "

On point 1 of the policy, there is no particular need for Clark’s to develop an edge of town unit with a drive through lane. They have in city and district centre locations and thus there is nothing about the business that intrinsically requires an edge-of-town location, nor a drive through lane. There are, however, several sites in city and district centres which could house a non drive-through restaurant, with several empty units along e.g. Reform St, Seagate, in the Wellgate centre, Keiller Centre, etc.; there are also empty units in district centres such as Albert St, Lochee High St, etc. The applicant has failed to consider such suitable sites and has failed to assess potential sites in a sequential assessment of city centre, district centre and commercial centre locations and therefore the application should be rejected on this basis.

On point 2 of the policy, yet more out-of-town provision continues to erode the vitality of the city and district centres, so will have a detrimental effect on these centres. For the past 30 years we have built out of town developments, and for the past 30 years we have lamented the death of the high street – the two are intrinsically linked. The applicant has provided no evidence that the proposed development would not affect city and district centres in the same way, and so the application should be refused on this basis.

On point 3 of the policy, the applicant has failed to demonstrate a lack of provision within, or on the edge of the city centre, district centres and commercial centres. This is because they cannot do so; the city centre, all district centres and almost all commercial centres in Dundee have provision for hot takeaway food and so the application should be rejected on this basis.

The proposed development fails on all points of Policy 21 and should therefore be refused.

Next, the proposed development also contravenes Local Development Policy 54: Safe and Sustainable Transport. In particular, this states that: "development proposals will be required to minimise the need to travel by private car.”

On this point, the proposal falls flat. A drive-through, by its very nature, is designed for people driving in private motor vehicles. The argument that drive-throughs do not generate many car journeys and that they simply capture passing trade is untrue - many people drive specifically to go to these restaurants. In fact, evidence shows that approximately 50% of journeys made to drive throughs are generated by the development (i.e., are journeys specifically made for the purpose) and so this proposed change of use to include a drive through would simply increase the use of private cars. Providing more facilities for people driving simply makes driving more attractive, so more people drive; this is a well-known and evidenced effect known as induced demand. Submitting a new application which includes a drive-through lane will therefore only serve to increase the number of journeys made by private car, and should be rejected on this basis.

Policy 54 also states that development proposals will need to “provide facilities on-site (and/or off-site through developer contributions or by direct delivery) for walking, cycling and public transport networks, including road/ junction improvements and cycle parking. Developments without high quality, safe and convenient links to adjacent walking and cycling networks will not be supported”

This development only includes pedestrian access from Fulton Road on the western boundary of the site. However, pedestrians and cyclists also require access to the site from Myrekirk Road to the East – rather than require them to walk/cycle all the way around the north of the site (or hop over the fence as is very likely to happen if the person is able-bodied) in order to access the development, there should also be pedestrian/cyclist access provided from Myrekirk Road. This would likely be a major point of entry to the site for pedestrians accessing the site from Charleston, or cyclists accessing the site from the nearby Green Circular. It appears that there is scope to provide this directly opposite the planned pedestrian entrance, adjacent to the “service bay” on the eastern boundary of the site. Provision of this entrance would also maintain the existing short-cut through the site which pedestrians make use of. This shortcut through the site should also be altered so that it is in a straight line, maintaining the desire line. We appreciate that planning permission for a takeaway on this site has already been approved, and strongly believe that you should refuse the addition of a drive-through lane. However, if planning permission is approved (although we believe it should not be), the provision of this pedestrian/cycle link would need to be included as a condition of approval.

Policy 54 also states that proposals need to “be supported by a travel plan to mitigate transport impacts and improve the accessibility of developments where the council considers that the development will generate significant travel”.

The application which was approved in June 2019 did include a travel statement, but as the applicant has now submitted a fresh application to include a drive through lane which will generate more private car travel to the site, there will need to be a new travel plan submitted if the application is to be approved (although again, we are opposed to this).

Next, Policy 56: Parking, states that:

"All new developments should include cycle parking facilities in accordance with Dundee City Council’s adopted guidance on roads standards and the Appendix 4 design standards. At places of employment covered secure parking with changing facilities should be provided for employees."

There should therefore be secure, covered cycle parking for as many employees as are expected to be working on shift at the same time - there are no such plans in the submitted proposals. There DO appear to be 6 cycle spaces (3 Sheffield stands, for staff/public use) but this is nowhere near enough the required amount for staff/customers. The number of cycle parking spaces needs to be increased dramatically, and they need to be covered. There also needs to be staff changing - and preferably, showering - facilities. The current plans appear to provide lockers, but no changing or showering facilities. Therefore, if the application is approved (although we believe it should not be), provision of additional covered, secure cycle parking, employee changing and showering would need to be included as a condition of approval.

Policy 56 also states that “All parking facilities at commercial developments should include the provision of charging stations for electric vehicles”. There is, however, no such provision in the submitted application. If the application is to be approved (and again, we strongly believe it should not be), provision of EV charging stations would need to be included as a condition of approval.

I urge you to reject the proposal based on the above, which we trust will be useful in making your decision.