Dear DCC Planning Team,  
  
I am writing to you to object to the planning application 21/00079/FULL, for the Erection of restaurant with drive-thru lane (Sui Generis) with associated parking and other ancillary works at Land In Car Park Of 61 Myrekirk Road Dundee. My objections are as follows:

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. "

The applicant states that: “A drive-thru restaurant is not considered to be a generator of significant footfall as a significant level of trips to the drive-thru unit will be made by vehicles and passing trade.”. However, this is quite a perverse and imaginative interpretation of the word “footfall”, which is clearly meant to mean people visiting a premises. People are driving these vehicles, so all visits to the restaurant count as footfall. As such, Policy 21 is very much relevant to this application.

On point 1 of the policy, there is no particular need for Burger King to develop an edge of town unit with a drive through lane. Burger King has hundreds, perhaps thousands of units at city or district centre locations and thus there is nothing about the business that intrinsically requires an edge-of-town location, nor a drive through lane. The applicant’s argument in their Planning Statement that the application fulfils Policy 21 because a drive through would not be suitable in a city or district centre is therefore null. As the applicant only assessed potential sites for a drive-through in their Sequential Statement, this document is equally redundant.

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 on Albert St, Lochee High St, etc. The applicant has failed to consider these and so 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’s statement in their Sequential Assessment that:

“Development at this location will not have a significant adverse effect on the vitality or viability of the City Centre, District Centres or Commercial Centres” is completely without evidence and ignores substantial evidence to the contrary; thus the application should be rejected.

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. Despite stating in the Sequential Assessment that the development “will address a deficiency in provision which cannot be met within or on the edge of these centres.”, the applicant has failed to provide evidence of this. 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. Indeed, planning permission has recently been granted for a Burger King drive through (20/00031/FULL) at Riverside Avenue – a 6 minute drive from the proposed location.

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. The effect of induced demand is well known, and continuing to build car-centric, edge of town developments will encourage far more unnecessary car journeys. The development will therefore only serve to increase the number of journeys made by private car, and should be rejected on this basis.

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 (for staff/public use) but this is nowhere near enough the required amount for staff. The number of cycle parking spaces needs to be increased dramatically. There also needs to be staff changing - and preferably, showering - facilities. The current plans only appear to provide lockers and changing facilities, but this ought to be clarified if the proposal is not rejected (although I believe it should be).

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