

ANGUS COUNCIL

DEVELOPMENT MANAGEMENT REVIEW COMMITTEE – 28 MARCH 2022

COASTGUARD STATION, 35 ADMIRAL STREET, CARNOUSTIE

REPORT BY THE DIRECTOR OF LEGAL AND DEMOCRATIC SERVICES

ABSTRACT:

The Committee is asked to consider an application for a review in respect of the change of use and extension of the former HM Coastguard Service Building to a Domestic Dwellinghouse (non-determination), application No 21/00590/FULL, at Coastguard Station, 35 Admiral Street, Carnoustie.

1. RECOMMENDATIONS

It is recommended that the Committee:-

- (i) review the case submitted by the Planning Authority (**Appendix 1**);
- (ii) review the case submitted by the Applicant (**Appendix 2**);
- (iii) consider the further lodged representations (**Appendix 3**); and
- (iv) consider the applicant's response to the further representations (**Appendix 4**).

2. ALIGNMENT TO THE ANGUS LOCAL OUTCOMES IMPROVEMENT PLAN/CORPORATE PLAN

This report contributes to the following local outcome(s) contained within the Angus Local Outcomes Improvement Plan and Locality Plans:

- Safe, secure, vibrant and sustainable communities
- A reduced carbon footprint
- An enhanced, protected and enjoyed natural and built environment

3. CURRENT POSITION

The Development Management Review Committee is required to determine if they have sufficient information to determine the Review without further procedure. If members do not determine the review without further procedure, the Review Committee must determine the manner in which the review is to be conducted. The procedures available in terms of the regulations are: written submissions, hearing sessions or inspection of the land to which the review relates.

4. FINANCIAL IMPLICATIONS

There are no financial implications arising directly from the recommendations in the Report.

5. EQUALITY IMPACT ASSESSMENT

An Equality Impact Assessment is not required.

6. CONSULTATION

In accordance with Standing Order 48(4), this Report falls within an approved category that has been confirmed as exempt from the consultation process.

NOTE: No background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973, (other than any containing confidential or exempt information) were relied on to any material extent in preparing the above Report.

Report Author: Sarah Forsyth
E-Mail: LEGDEM@angus.gov.uk

List of Appendices:

Appendix 1 – Submission by Planning Authority

Appendix 2 – Submission by Applicant

Appendix 3 – Further Lodged Representations

Appendix 4 – Applicant Response to Further Representations

ANGUS COUNCIL'S SUBMISSION FOR NON DETERMINATION

APPLICATION NUMBER – 21/00590/FULL

APPLICANT- MISS SUSAN ALEXANDER

**PROPOSAL & ADDRESS – CHANGE OF USE AND EXTENSION OF THE FORMER HM
COASTGUARD SERVICE BUILDING TO A DOMESTIC DWELLINGHOUSE AT
COASTGUARD STATION 35 ADMIRAL STREET CARNOUSTIE**

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Thursday, 26 August 2021



Local Planner
Planning Service
Angus Council
Forfar
DD8 1AN

Development Operations
The Bridge
Buchanan Gate Business Park
Cumbernauld Road
Steps
Glasgow
G33 6FB

Development Operations
Freephone Number - 0800 3890379
E-Mail - DevelopmentOperations@scottishwater.co.uk
www.scottishwater.co.uk



Dear Customer,

Coastguard Station, 35 Admiral Street, Carnoustie, DD7 6BA
Planning Ref: 21/00590/FULL
Our Ref: DSCAS-0047280-T43
Proposal: Proposed change of use and extension for the former HM Coastguard Service building in Carnoustie to a domestic dwellinghouse

Please quote our reference in all future correspondence

Audit of Proposal

Scottish Water has no objection to this planning application; however, the applicant should be aware that this does not confirm that the proposed development can currently be serviced and would advise the following:

Water Capacity Assessment

Scottish Water has carried out a Capacity review and we can confirm the following:

- ▶ There is currently sufficient capacity in CLATTO Water Treatment Works to service your development. However, please note that further investigations may be required to be carried out once a formal application has been submitted to us.

Waste Water Capacity Assessment

- ▶ There is currently sufficient capacity for a foul only connection in the HATTON PFI Waste Water Treatment works to service your development. However, please note that further investigations may be required to be carried out once a formal application has been submitted to us.

Please Note

- ▶ The applicant should be aware that we are unable to reserve capacity at our water and/or waste water treatment works for their proposed development. Once a formal connection application is submitted to Scottish Water after full planning permission has been granted, we will review the availability of capacity at that time and advise the applicant accordingly.

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should contact Scottish Water at the earliest opportunity with strong evidence to support the intended drainage plan prior to making a connection request. We will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

General notes:

- ▶ Scottish Water asset plans can be obtained from our appointed asset plan providers:
 - ▶ Site Investigation Services (UK) Ltd
 - ▶ Tel: 0333 123 1223
 - ▶ Email: sw@sisplan.co.uk
 - ▶ www.sisplan.co.uk
- ▶ Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area, then they should write to the Customer Connections department at the above address.
- ▶ If the connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.
- ▶ Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.

- ▶ The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or SUDS proposed to vest in Scottish Water is constructed.
 - ▶ Please find information on how to submit application to Scottish Water at [our Customer Portal](#).
-

Next Steps:

▶ **All Proposed Developments**

All proposed developments require to submit a Pre-Development Enquiry (PDE) Form to be submitted directly to Scottish Water via [our Customer Portal](#) prior to any formal Technical Application being submitted. This will allow us to fully appraise the proposals.

Where it is confirmed through the PDE process that mitigation works are necessary to support a development, the cost of these works is to be met by the developer, which Scottish Water can contribute towards through Reasonable Cost Contribution regulations.

▶ **Non Domestic/Commercial Property:**

Since the introduction of the Water Services (Scotland) Act 2005 in April 2008 the water industry in Scotland has opened to market competition for non-domestic customers. All Non-domestic Household customers now require a Licensed Provider to act on their behalf for new water and waste water connections. Further details can be obtained at www.scotlandontap.gov.uk

▶ **Trade Effluent Discharge from Non Dom Property:**

- ▶ Certain discharges from non-domestic premises may constitute a trade effluent in terms of the Sewerage (Scotland) Act 1968. Trade effluent arises from activities including; manufacturing, production and engineering; vehicle, plant and equipment washing, waste and leachate management. It covers both large and small premises, including activities such as car washing and launderettes. Activities not covered include hotels, caravan sites or restaurants.
- ▶ If you are in any doubt as to whether the discharge from your premises is likely to be trade effluent, please contact us on 0800 778 0778 or email TEQ@scottishwater.co.uk using the subject "Is this Trade Effluent?". Discharges that are deemed to be trade effluent need to apply separately for permission to discharge to the sewerage system. The forms and application guidance notes can be found [here](#).
- ▶ Trade effluent must never be discharged into surface water drainage systems as these are solely for draining rainfall run off.
- ▶ For food services establishments, Scottish Water recommends a suitably sized grease trap is fitted within the food preparation areas, so the development

complies with Standard 3.7 a) of the Building Standards Technical Handbook and for best management and housekeeping practices to be followed which prevent food waste, fat oil and grease from being disposed into sinks and drains.

- ▶ The Waste (Scotland) Regulations which require all non-rural food businesses, producing more than 50kg of food waste per week, to segregate that waste for separate collection. The regulations also ban the use of food waste disposal units that dispose of food waste to the public sewer. Further information can be found at www.resourceefficientscotland.com

I trust the above is acceptable however if you require any further information regarding this matter please contact me on **0800 389 0379** or via the e-mail address below or at planningconsultations@scottishwater.co.uk.

Yours sincerely,

Pamela Strachan

Development Operations Analyst

Tel: 0800 389 0379

developmentoperations@scottishwater.co.uk

Scottish Water Disclaimer:

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."

ANGUS COUNCIL

PLANNING

CONSULTATION SHEET

PLANNING APPLICATION NO

21/00590/FULL

Tick boxes as appropriate

ROADS

No Objection

Interest

(Comments to follow within 14 days)

Date

03	09	21
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PLEASE DO NOT TAKE AWAY THE LAST SET OF PLANS WHERE POSSIBLE COPIES WILL BE PROVIDED ON REQUEST

ELECTRONIC SUBMISSION DRAWINGS TO BE VIEWED VIA IDOX

Memorandum

Infrastructure Roads & Transportation

TO: DEVELOPMENT STANDARDS MANAGER, PLANNING

FROM: TRAFFIC MANAGER, ROADS

YOUR REF:

OUR REF: CH/AG/ TD1.3

DATE: 30 SEPTEMBER 2021

SUBJECT: **PLANNING APPLICATION REF. NO. 21/00590/FULL – PROPOSED CHANGE OF USE AND EXTENSION TO THE FORMER HM COASTGUARD SERVICE BUILDING TO FORM A DWELLINGHOUSE AT 5 ADMIRAL STREET, CARNOUSTIE**

I refer to the above planning application.

The National Roads Development Guide, adopted by the Council as its road standards, is relative to the consideration of the application and the following comments take due cognisance of that document.

The site is located on the former Coastguard Station which is located at the south end of Admiral Street, Carnoustie.

A submitted design and access statement states that, the site can be accessed via Admiral street, where there is parking provision for four vehicles including a disabled space. The user can then access the property via a small timber gate on the north boundary. Alternatively, there is vehicular access via the Route 1 National Cycle Network to the front (South) of the property. The disabled bay sits in the southwest corner of the parking area and will not be affected by the proposed access.

Submitted drawing no. SP01 shows the proposed parking provision for two vehicles to the north of the application site which will reduce any potential risk of accidents with pedestrian/cyclists using the shared used cycle track.

Adjacent to the site Admiral Street is not on the List of Public Roads, therefore no roads authority consent is necessary for the vehicle access.

I have considered the application in terms of the traffic likely to be generated by it, and its impact on the public road network. As a result, I do not object to the application.

I trust the above comments are of assistance but should you have any queries, please contact Adrian Gwynne on extension 2036.

A handwritten signature in black ink, appearing to be the initials 'AG' or similar, located at the end of the letter.

Comments for Planning Application 21/00590/FULL

Application Summary

Application Number: 21/00590/FULL

Address: Coastguard Station 35 Admiral Street Carnoustie DD7 6BA

Proposal: Proposed change of use and extension for the former HM Coastguard Service building in Carnoustie to a domestic dwellinghouse

Case Officer: James Wright

Customer Details

Name: Mr Neil Lackenby

Address: 3C Admiral Street Carnoustie Angus DD7 6BA

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to the proposed development as the increase in elevation will be detrimental to the natural light exposure to rear of my dwelling.

I object to the proposed development as it will increase the amount of road use and therefore effect road safety immediately adjacent the rear entry to my dwelling.

Comments for Planning Application 21/00590/FULL

Application Summary

Application Number: 21/00590/FULL

Address: Coastguard Station 35 Admiral Street Carnoustie DD7 6BA

Proposal: Proposed change of use and extension for the former HM Coastguard Service building in Carnoustie to a domestic dwellinghouse

Case Officer: James Wright

Customer Details

Name: Mr Jonathan Oldfield

Address: 9 Admiral Street Carnoustie DD76BA

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Serious safety concerns over proposed car parking with permanent residents, whom of six residents are registered disabled blue badge holders, the proposed access for vehicles clashes with disabled parking bay and residents parking.

In addition access to the fire hydrant on the footpath is required for the utilities operatives at least once a month for the drainage works which the utilities equipment run along the front of the proposed parking provision, new opening garage access and bin storage on the boundary/kerb line.

The proposed height of the building is another serious concern, and would like to see shadow analysis for different times of the day as it will effect all households all year round. The current height of the existing building clashes with all residents and i believe the new proposed height is a serious issue.

Privacy concerns regarding windows on the west elevation of the building.

Comments for Planning Application 21/00590/FULL

Application Summary

Application Number: 21/00590/FULL

Address: Coastguard Station 35 Admiral Street Carnoustie DD7 6BA

Proposal: Proposed change of use and extension for the former HM Coastguard Service building in Carnoustie to a domestic dwellinghouse

Case Officer: James Wright

Customer Details

Name: Mr Jonathan Oldfield

Address: 9 Admiral Street Carnoustie DD76BA

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Bat survey submitted is not a bat survey. Its is simply an email from someone living hundreds miles away with no knowledge of the site, nor having visited the site, saying that there are no bats in the area. There are bats in the area, many are found on the golf courses, railway embankment, beach and open spaces in the area. The elevation drawings are either incorrect, or they would propose a first floor living room window on the north elevation. If that is the case, that living room window would have a significant adverse impact on the privacy of the private gardens of the properties to the north. The east and west elevations also appear to mixed up so it is not clear what is actually proposed. The proposed site will require SUDS into the site and will further reduce the area available for development and again points to the symptoms of the proposal representing the over development of the site.

Overdevelopment- the proposal would result in a large, two-storey house with a footprint almost double the size of surrounding properties on plots that are closer the size of the one proposed. The resultant property would be shoe horned into the site to maximise the value of the site, but this would detract from the character of the area.

Comments for Planning Application 21/00590/FULL

Application Summary

Application Number: 21/00590/FULL

Address: Coastguard Station 35 Admiral Street Carnoustie DD7 6BA

Proposal: Proposed change of use and extension for the former HM Coastguard Service building in Carnoustie to a domestic dwellinghouse

Case Officer: James Wright

Customer Details

Name: Mr Ian Burgess

Address: 15 Admiral Street Carnoustie DD7 6BA

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: We are concerned about parking, as there is 13 homes in this small corner which need access. At the moment about 9 cars can be parked. The plans also affect the 1 space for disabled parking. Any loss of existing parking spaces would create massive problems. The coastguard were able for years to use vehicle access from existing road, therefore not encroaching on parking facilities of house holders. The height of the proposed new building 6.841 metres which is an increase of 1.841 metres is vastly out of proportion to properties on that frontage. A building nearly twice the size is not very considerate to existing householders.

From: [REDACTED]
Sent: 08 September 2021 00:32
To: [REDACTED]
Cc: [REDACTED]
Subject: PLANNING APPLICATION REF: 21/00590/FULL - COASTGUARD STATION, 35 ADMIRAL ST, CARNOUSTIE, DD7 6BA

[REDACTED]

CONFIDENTIAL EMAIL - INTENDED RECIPIENT ONLY

CONFIDENTIAL

Dear Sirs

We object to the application on the following grounds (and in no particular order):-

- Overshadowing. The proposed increase in elevation to 6.841m (an increase of almost 1.5m from the existing elevation) and the shape of the proposed new building will cause significant overshadowing on our property (and neighbouring properties). Drawing 5 in the submitted overshadowing analysis shows that the shadow at midday in winter will overshadow the windows in our kitchen, living room, upstairs office and upstairs bedroom (at least two, if not three, of which qualify as habitable rooms) together with nearly all of our garden. Drawing 4 appears to indicate that our kitchen and living room are impacted by shadow at 12pm in winter at the moment by the building in its existing form but that is not the case. **My understanding is that it is good practice for overshadowing analysis to show the impact in the morning, afternoon and evening too – it is telling that no overshadowing analysis for those times of day are included as part of this application (and only the impact of the midday sun – when it is at its highest – is included)!!** No decision on this application should be made without an updated overshadowing analysis including the above different times of day and I would suggest verification of that analysis be obtained as the existing one does not look to be correct (and there is no mention of how the overshadowing was calculated and what angles were used). **In summary, even on the basis of the poor overshadowing analysis provided, the proposed new building has an unacceptable adverse impact on the amenity of nearby properties as a result of the overshadowing it will cause – thereby failing to comply with policies DS4 and TC2 of the Angus Local Development Plan 2016**
- Character and pattern of development in surrounding area. The proposed elevation of the new building certainly does not fit within the character and pattern of the surrounding area. Not one house in the surrounding area as close to the coastal path (and right on the border of open space protection – see policy DS1 of the Angus Development Plan 2016) is anything like that height. My understanding is that two applications for higher/taller buildings in nearby Seabraes were refused and so it would be obtuse for this one to be

approved. The proposal would see a large building (outwith the character and pattern of the surrounding development) “shoe-horned” in to an unsuitable space – there would be no “coherent structure of streets, spaces and buildings” as set out in policy DS3 of the Angus Local Development Plan 2016. It is also not going to fall within the affordable housing bracket given (i) the amount paid by the proprietor to buy the site and (ii) the proposed size of the house and its location. **In light of all of that, the proposal clearly fails to comply with policies TC2, DS3 and DS4 of the Angus Local Development Plan 2016.**

- Policy DS4 (Amenity) of the Angus Local Development Plan. It focuses on unacceptable adverse impact on the surrounding area or amenity of existing or future occupiers of nearby properties. The following are given as examples in DS4 – (i) light pollution, (ii) effect and timing of traffic movement to, from and within the site, car parking and impacts on highway safety and (iii) residential amenity in relation to overlooking and loss of privacy, outlook, sunlight, daylight and overshadowing. For obvious reasons, every single one of those three items will be adversely affected for the occupiers of nearby properties as a result of the proposed new building here. Policy DS4 goes on to concede that the Council may support development which is considered to have an impact on such considerations but only if mitigating or compensatory measures are secured. However, in this case, it is impossible for any appropriate or reasonable mitigating or compensatory measures to be secured for nearby properties and so it will not be possible for the proposal to comply with policy DS4.
- Access/Parking.
 - The proposed site plan appears to show two parking spaces within the boundary of the property and as a continuation from the parking available beside the existing pavement. That simply does not work as cars currently park right up to the boundary of the property and so the two ‘new’ spaces would effectively be blocked in (the photos on p.6 of the Design and Access Statement submitted by the applicant even show why that would happen – the white Citroen car illustrating the problem that putting the two parking spaces there would cause!!). From a legal perspective, the lack of proper vehicular access to this site is surely a concern for the new owner who paid the eye-watering sum of £156,000 for the site in an auction process (especially given the issues with vehicular access jumped out from the sale particulars).
 - The Design and Access Statement appears to suggest that the previous owner of the building (the Coastguard) accessed the site via Admiral Street and the timber gate next to the car park. That is an incorrect statement – the Coastguard, as an emergency service, accessed the site via the cycle path to the south of the property and never used Admiral Street or the timber gate at all in the 10+ years we have lived here.
 - We would also flag that the existing car park is already fully utilised by existing residents and so to suggest in the Design and Access Statement that the proposed new building could also use that car park is nonsensical. Many of the current users are elderly and so cannot be expected to park further away in Admiral Street and walk a significant distance in order to facilitate extra users of the car park as a result of the proposed new building.

- The proposed garage on the site exits immediately on to an existing disabled parking space which is, by definition, an unacceptable impact on surrounding amenity, access and infrastructure.
- The increased traffic (and proposed new garage) right next to the back gate of my property causes me significant safety concerns as I have two young children who regularly use that gate (and my neighbours also have young children).
- **In summary, the proposed access and parking for the new building appear to fall short of policies DS4 and TC2 of the Angus Local Development Plan as, aside from not actually working, the proposals would certainly cause an unacceptable impact on access and amenity for existing neighbouring residents.**
- Other
 - The small housing sites planning advice note on the Angus Council Planning portal states that a general guide for a MINIMUM plot area is 400 square metres but that a LOWER MINIMUM of 350 square metres may be appropriate depending on any unduly adverse effect the proposal may have on neighbouring properties. The site area here is 330 square metres in a fairly densely populated area so surely does not comply with the Angus Council planning guidance note. The proposed building also seems to cover more than 30% of the overall plot – which also goes against the same guidance note. The same guidance note indicates that the distance between the proposed new building and existing buildings here is also likely to be an issue (in respect of main living room window or habitable room window to window issues).
 - The submitted Design and Access Statement indicates the proposed new building is intended to be a family home. Given the remoteness of the owner of the site (our understanding being that she is South East-based) and the price at which a house such as the one proposed would sell for, we have serious concerns that the intention is to develop this site and then rent it out as holiday accommodation through sites such as Airbnb. Our neighbours also share this serious concern. If that proved to be the case then it would be extremely detrimental to neighbouring properties.
 - Veolia/Scottish Water. The site sits right next to the pumping station and storage tanks at Ballister Park. Veolia (or Scottish Water) regularly carry out works there and, in particular, a massive crane sits right outside the property on a monthly basis. It would be interesting to get Veolia's views on the application as the proposed building would impinge on the works carried out by that crane. Similarly, there are utilities on the north of the site right next to where the proposed two parking spaces are meant to sit. Both of these issues would appear to point to an unacceptable impact on surrounding infrastructure (and so fail to comply with policy TC2 of the Angus Local Development Plan).

Best Regards
Chris

Sent: 13 September 2021 11:41
To: [REDACTED]
Subject: PLANNING APPLICATION REF: 21/00590/FULL - COASTGUARD STATION, 35 ADMIRAL ST, CARNOUSTIE, DD7 6BA

CONFIDENTIAL EMAIL - INTENDED RECIPIENT ONLY

CONFIDENTIAL

Dear Sirs

This is a supplementary objection to our existing objection to the application on the following grounds:-

OVERDEVELOPMENT: The proposal would result in a large, two-storey house with a footprint almost double the size of surrounding properties on plots that are closer the size of the one proposed. The resultant property would be 'shoe-horned' into the site to maximise the value of the site, but this would detract from the character of the area. The proposal is contrary to the plot size requirements of the Council and the plot ratio also fails to meet the minimum requirements of Angus Council Advice Note 14, let alone reflect the character and density of other properties in the area.

CHARACTER AND PATTERN OF DEVELOPMENT: The character of the area is predominantly that of a seaside town, with small, single-storey cottages/houses/outbuildings along the sea front, cycle track and open space. Whilst there are some larger properties in the area, these are all set back from the sea front/open space/cycle track. All properties on front are single storey in height and that forms an important part of the character of this area. The proposal would result in a two-storey house, with a significant roof slope and that alone would be at odds with the character of the area. The design of the building is akin to a warehouse or an agricultural shed. The long, low roof pitch would be completely at odds with any of the surrounding properties and is nothing more than an attempt to mask the symptoms of over developing the site. As a result, the proposal would fail to respect the character and pattern of development in the area, and detract from the seaside/cottage/small scale frontage development. It would also lead to the possibility of all of the other garages, cottages and buildings in this area seeking to increase their scale and height to the detriment of the character and amenity of the area. If the principle of a house on this site is considered to be acceptable, the height of it should be no higher than the existing building on the site.

ACCESS: The proposal would create a new vehicular access onto the road. Contrary to what is stated in the application, vehicles do not access the site from Admiral Street, the existing access is from the cycle track to the south. A new access here would remove on street parking for the existing properties to the north and west of the site. Those houses do not have their own off-street parking and no alternatives are available for them if the on-street spaces were to be lost through the proposed development. If the new access were to be granted, the displacement of the cars which currently park on street at the point of the proposed access would have an adverse impact on the capacity and safe operation of surrounding streets which already experience high levels of on-street parking.

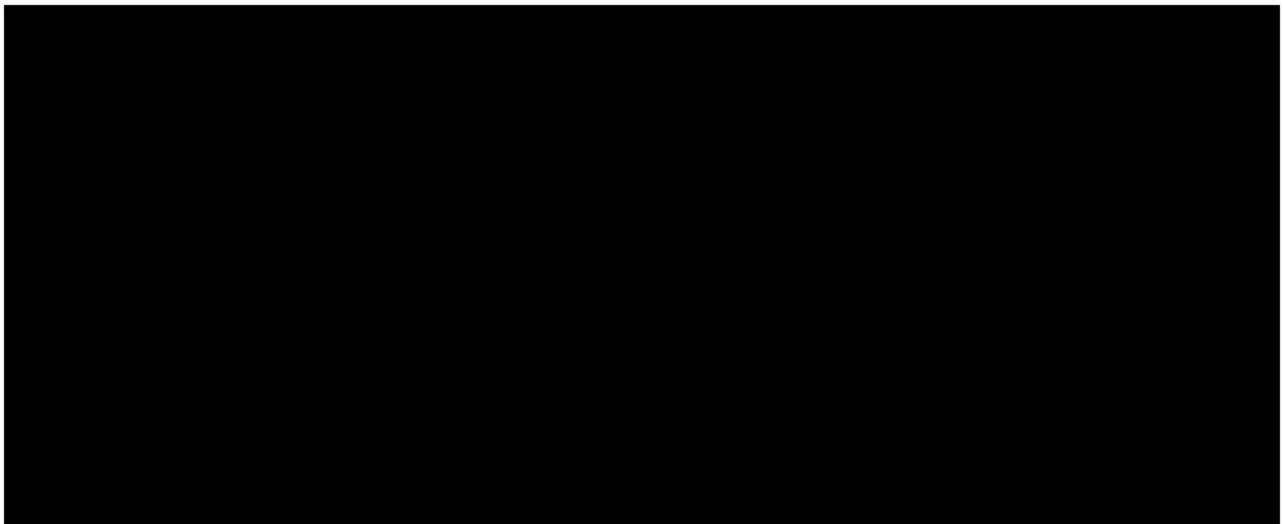
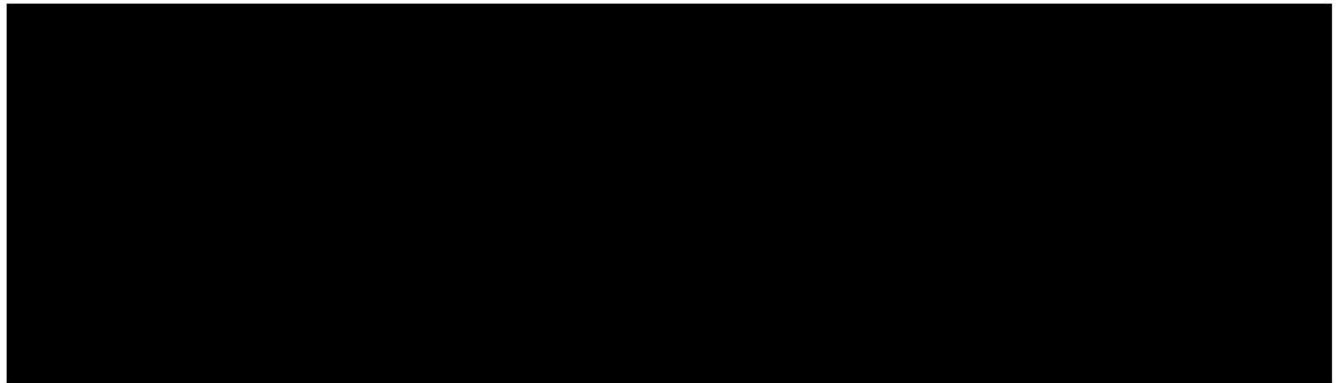
DRAINAGE: The applicant states on the application form that SUDS is proposed. However, there is no indication of where or how this would fit into the plot (contrary to what that information being

requested on the application form). Scottish Water states that no connection will be granted to connect surface water into the sewer so SUDS will be required. Factoring SUDS into the site will further reduce the area available for development and again points to the symptoms of the proposal representing overdevelopment of the site.

PLANS: The elevation drawings are either incorrect, or they would propose a first floor living room window on the north elevation. If that is the case, that living room window would have a significant adverse impact on the privacy of the private gardens of the properties to the north. The east and west elevations also appear to be mixed up so it is not clear what is actually proposed.

ALTERNATIVE USES: Whilst the application is for a house, it has all the hallmarks of the intention being to rent the property out for short term let accommodation. This would have a further significant impact on the neighbouring properties. The applicant should be clear and honest to the community about what they propose. If approval is considered appropriate (which it should not be for the reasons stated above), it should be made clear to the applicant on the decision notice that any form of short term let type accommodation would not be acceptable and that consent from the planning authority should be required for such.

Best Regards
Chris



Comments for Planning Application 21/00590/FULL

Application Summary

Application Number: 21/00590/FULL

Address: Coastguard Station 35 Admiral Street Carnoustie DD7 6BA

Proposal: Proposed change of use and extension for the former HM Coastguard Service building in Carnoustie to a domestic dwellinghouse

Case Officer: James Wright

Customer Details

Name: Mrs Isabella Barr

Address: 29 Admiral Street Carnoustie DD7 6BA

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The height of building is out of line with our houses in area and will effect our view also block off the sunlight also the parking area as I am one of the disabled people who live in here I need my son to get access up to kerb to pick me up also most of the cars parked are for disabled residents

Comments for Planning Application 21/00590/FULL

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Address: Coastguard Station 35 Admiral Street Carnoustie DD7 6BA

Proposal: Proposed change of use and extension for the former HM Coastguard Service building in Carnoustie to a domestic dwellinghouse

Case Officer: James Wright

Customer Details

Name: Mr Robert Bowan

Address: 21 admiral street carnoustie DD76BA

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The proposal is contrary to the plot size requirements of the council and the plot ratio also fails to meet the minimum requirements of angus council advice note 14, let alone reflect the character and density of other properties in the area. The design of the building is akin to a warehouse or an agricultural shed. The long, low roof pitch would be completely at odds with any of the surrounding properties and is nothing more than an attempt to mask the symptoms of over developing the site. As a result, the proposal would fail to respect the character and pattern of development in the area, and detract from the seaside/cottage/small scale frontage development. It would also lead to the possibility of all of the other garages, cottages and buildings in this area seeking to increase their scale and height to the detriment of the character and amenity of the area. The proposal would create a new vehicular access onto the road. Contrary to what is stated in the application, vehicles do not access the site from admiral street, the existing access is from the cycle track to the south. A new access here would remove on street parking for the existing properties to the north and west of the site. Those houses do not have their own off-street parking and no alternatives are available for them if the on street spaces were to be lost through the proposed development. If the new access were to be granted, the displacement of the cars which currently park on street at the point of proposed access would have an adverse impact on the capacity and safe operation of surrounding streets which already experience high levels of on street parking. The applicant states on the application form SUDS is proposed. However, there is no indication of where or how this would fit into the plot (contrary to what that information being requested on the application form). Scottish water states that no connection will be granted to connect surface water into the sewer so SUDS is required.

Comments for Planning Application 21/00590/FULL

Application Summary

Application Number: 21/00590/FULL

Address: Coastguard Station 35 Admiral Street Carnoustie DD7 6BA

Proposal: Proposed change of use and extension for the former HM Coastguard Service building in Carnoustie to a domestic dwellinghouse

Case Officer: James Wright

Customer Details

Name: Ms Teresa O'Neill

Address: 11 Admiral Street Carnoustie DD7 6BA

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The proposed alteration to the current building (modern design), would be out of character with the current dwellings in the surrounding area; and the proposed size would dominate the area. The mass and proximity of the rear elevation would present an overbearing element and raises concerns with respect to the impact this will have on the natural light exposure to the front of the current dwellings.

The proposed access provision, that is, the creation of a driveway to park 'off road' would entail the loss of existing much used and needed, on street parking by the elderly residents and would therefore be detrimental to highway safety and residential amenity.

The proposed development does not appear to have a garden, is the development to be a family dwelling or geared towards holiday rental provision, which would have an adverse effect on the neighbourhood.

Subject:

Planning application reference : 21/00590/full

Sir, I am writing to pose an objection to the proposed development at Coastguard Station, 35 Admiral Street, Carnoustie DD7 6BA

Policy DS4 in the Angus Local Development Plan requires Angus council to consider the impacts of the proposed development on traffic movements to, from and within the site, car parking and impacts on road safety.

Having carefully reviewed the plans, we are concerned with the proposed site access arrangements and the impact this will have on existing residents car parking. There are already insufficient parking spaces for the existing properties. There are thirteen dwellings and space for a maximum of nine vehicles. The area must also be kept available for emergency vehicles, and as a number of residents are elderly or have medical conditions, this is vitally important.

The loss of car parking for residents will likely result in displacement parking to already congested neighbouring streets. This will have negative impact on road safety.

For these reasons, we consider the proposal is contrary to Policy DS4.

In addition, I would point out that the walkway in front of the proposed development is regularly used by cars and delivery vehicles, and at least four existing garages open out on to it! Indeed, it was what the coast guards used to access the building when they occupied it, so to state that the path is used mainly by pedestrians and cyclists is a fallacy.

Regards, Colin and June Christison (25 Admiral Street, Carnoustie)

[REDACTED]

Comments for Planning Application 21/00590/FULL

Application Summary

Application Number: 21/00590/FULL

Address: Coastguard Station 35 Admiral Street Carnoustie DD7 6BA

Proposal: Proposed change of use and extension for the former HM Coastguard Service building in Carnoustie to a domestic dwellinghouse

Case Officer: James Wright

Customer Details

Name: Mr GAVIN GRANT

Address: 3B ADMIRAL STREET CARNOUSTIE DD7 6BA

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I agree with the various objections put forward already - particularly in relation to access, overshadowing and general suitability of the site

Comments for Planning Application 21/00590/FULL

Application Summary

Application Number: 21/00590/FULL

Address: Coastguard Station 35 Admiral Street Carnoustie DD7 6BA

Proposal: Proposed change of use and extension for the former HM Coastguard Service building in Carnoustie to a domestic dwellinghouse

Case Officer: James Wright

Customer Details

Name: Mr Stewart Derrick

Address: 27 admiral street carnoustie dd76ba

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Whilst the application is for a house, it has all the hallmarks of the intention being to rent the property out for short term let accommodation. This would have a further significant impact on the neighbouring properties. The applicant should be clear and honest with the community about what they propose.

The parking issues currently is a concern, never mind taking away the additional space to create new parking for the proposal.

Comments for Planning Application 21/00590/FULL

Application Summary

Application Number: 21/00590/FULL

Address: Coastguard Station 35 Admiral Street Carnoustie DD7 6BA

Proposal: Proposed change of use and extension for the former HM Coastguard Service building in Carnoustie to a domestic dwellinghouse

Case Officer: James Wright

Customer Details

Name: Mr Robert Stack

Address: 19 Admiral Street Carnoustie DD76BA

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Current car park can only park 8 vehicles. The architect has only proposed 4 spaces on his planning application. There are not enough car parking spaces for all residents and have to park out on street at times due to the lack of parking spaces.

The proposed surface water issues will cause problems for building due to Scottish water demands. Why has the architect not addressed this in his proposal.

Why has the design team not submitted a full bat survey! Very poor proposal with not accurate information and drawings.

Comments for Planning Application 21/00590/FULL

Application Summary

Application Number: 21/00590/FULL

Address: Coastguard Station 35 Admiral Street Carnoustie DD7 6BA

Proposal: Proposed change of use and extension for the former HM Coastguard Service building in Carnoustie to a domestic dwellinghouse

Case Officer: James Wright

Customer Details

Name: Mrs Phyliss Dempster

Address: 23 Admiral Street Carnoustie DD7 6BA

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

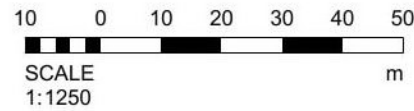
Comment: I strongly object the proposal due to the parking proposal and height of new building proposed.

I do see a number of issues supplied by the architect, and suggest Angus council look into this with great detail.



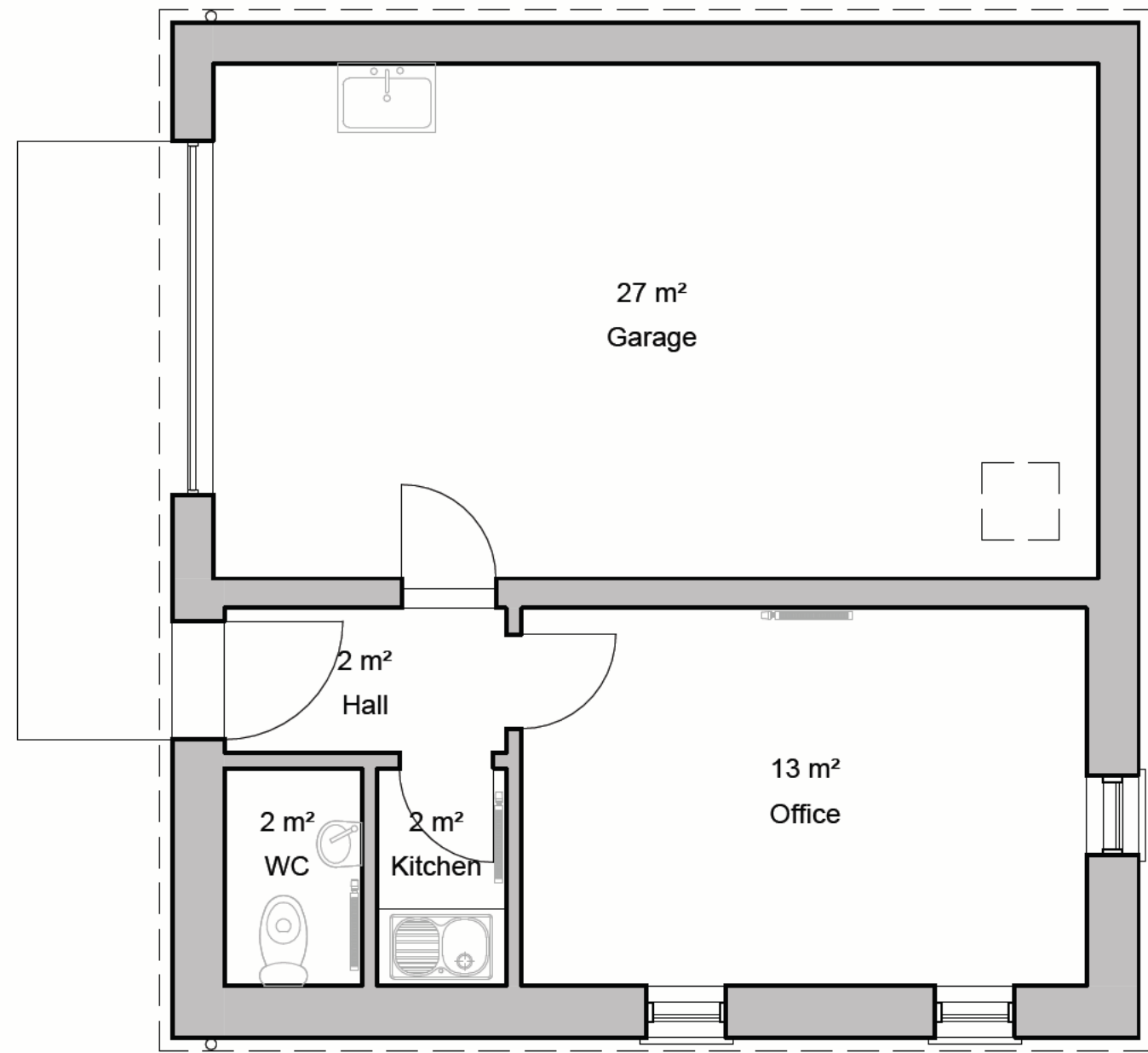
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Carnoustie Coastguard Station
 LP01 Location Plan
 A3

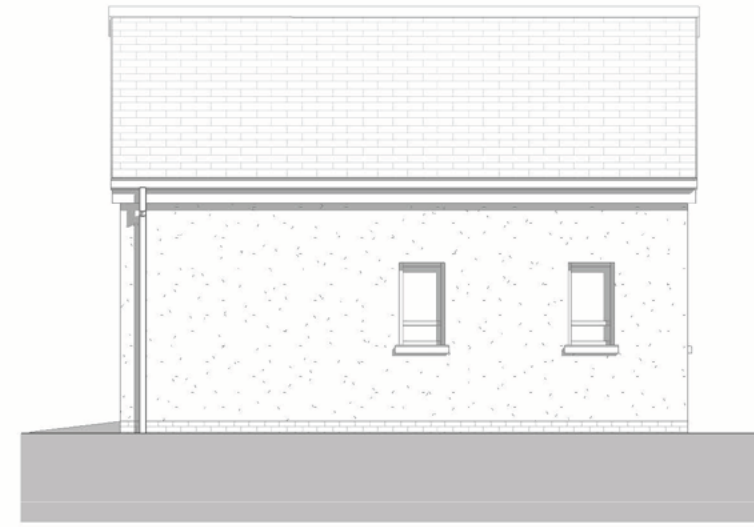


2A Orange Lane,
 Montrose, DD10 8ND
 01674 675 610
garry@garryadamarchitect.co.uk
www.garryadamarchitect.co.uk





1 Existing Ground Floor Plan
1 : 50



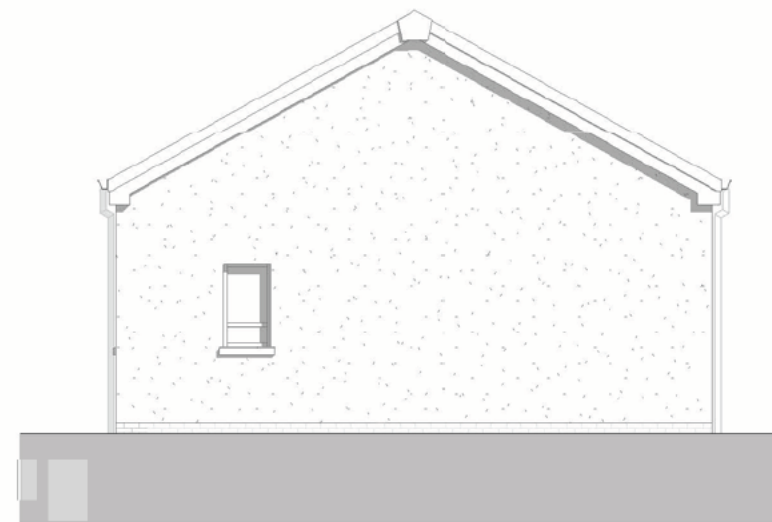
3 Existing South Elevation
1 : 100



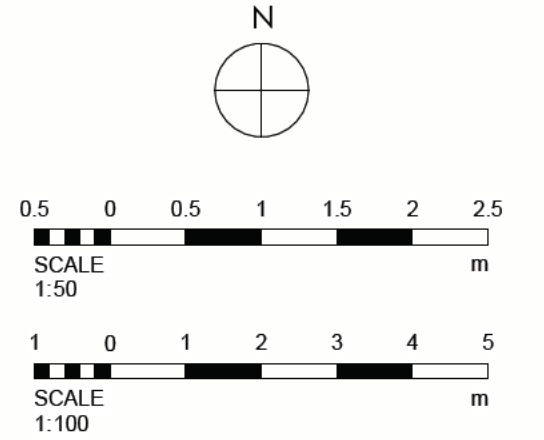
2 Existing West Elevation
1 : 100



4 Existing North Elevation
1 : 100



5 Existing East Elevation
1 : 100



Rev A - Ammended Label Error

Planning		
Project Carnoustie Coastguard Station		
Title Existing Plan & Elevations		
Job No. 257	Rev. A	Drawing No. EX01
Scale 1:50 1:100	Paper A2	Date July 2021
2A Orange Lane, Montrose, DD10 8ND		
01674 675 610 garry@garryadamarchitect.co.uk www.garryadamarchitect.co.uk		



B PO Comments	210811
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Planning

Project
Carnoustie Coastguard Station

Title
Proposed Site Plan

Job No.	Rev.	Drawing No.
257	B	SP01

Scale	Paper	Date
1:200	A2	July 2021

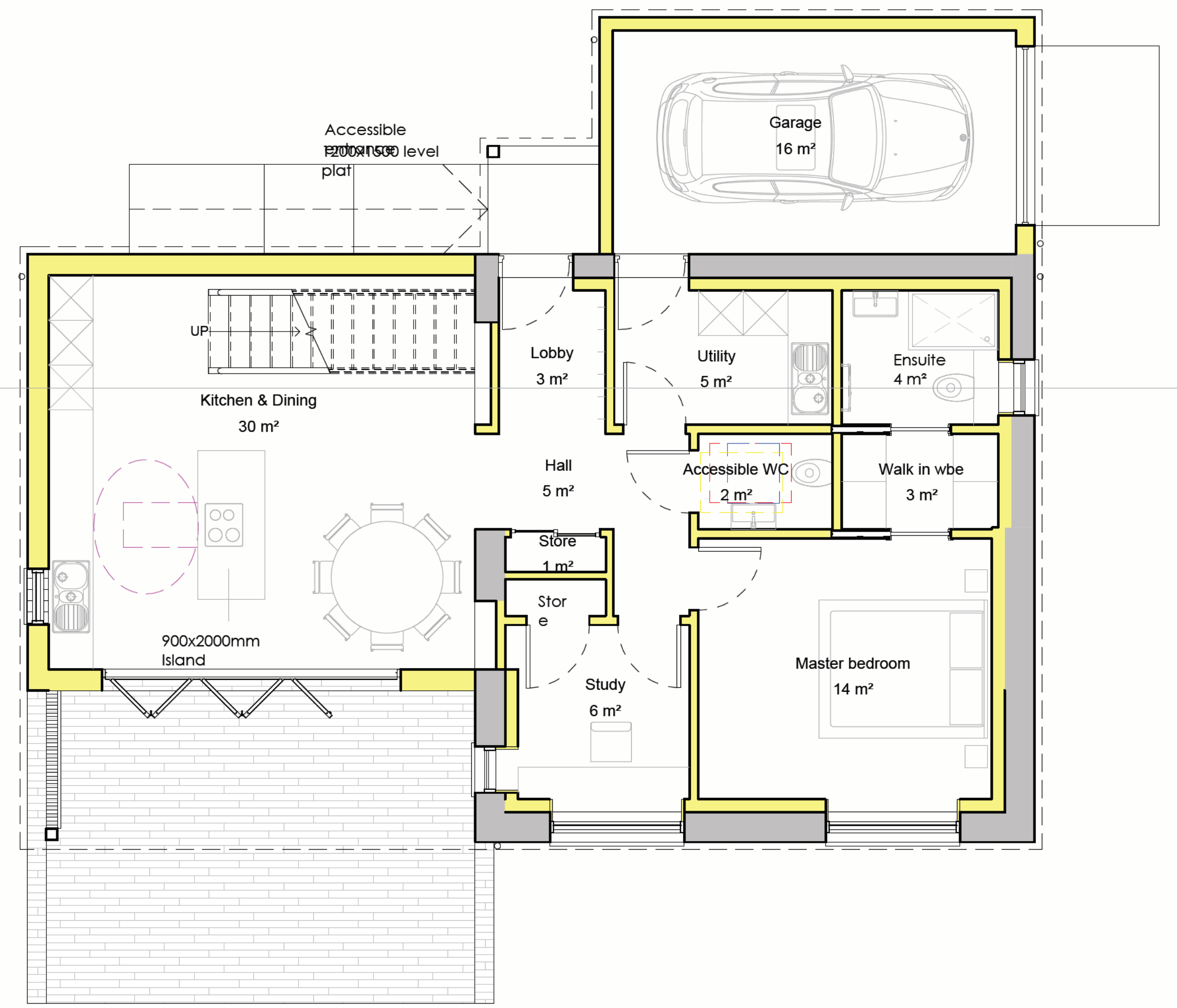


2A Orange Lane,
 Montrose, DD10 8ND

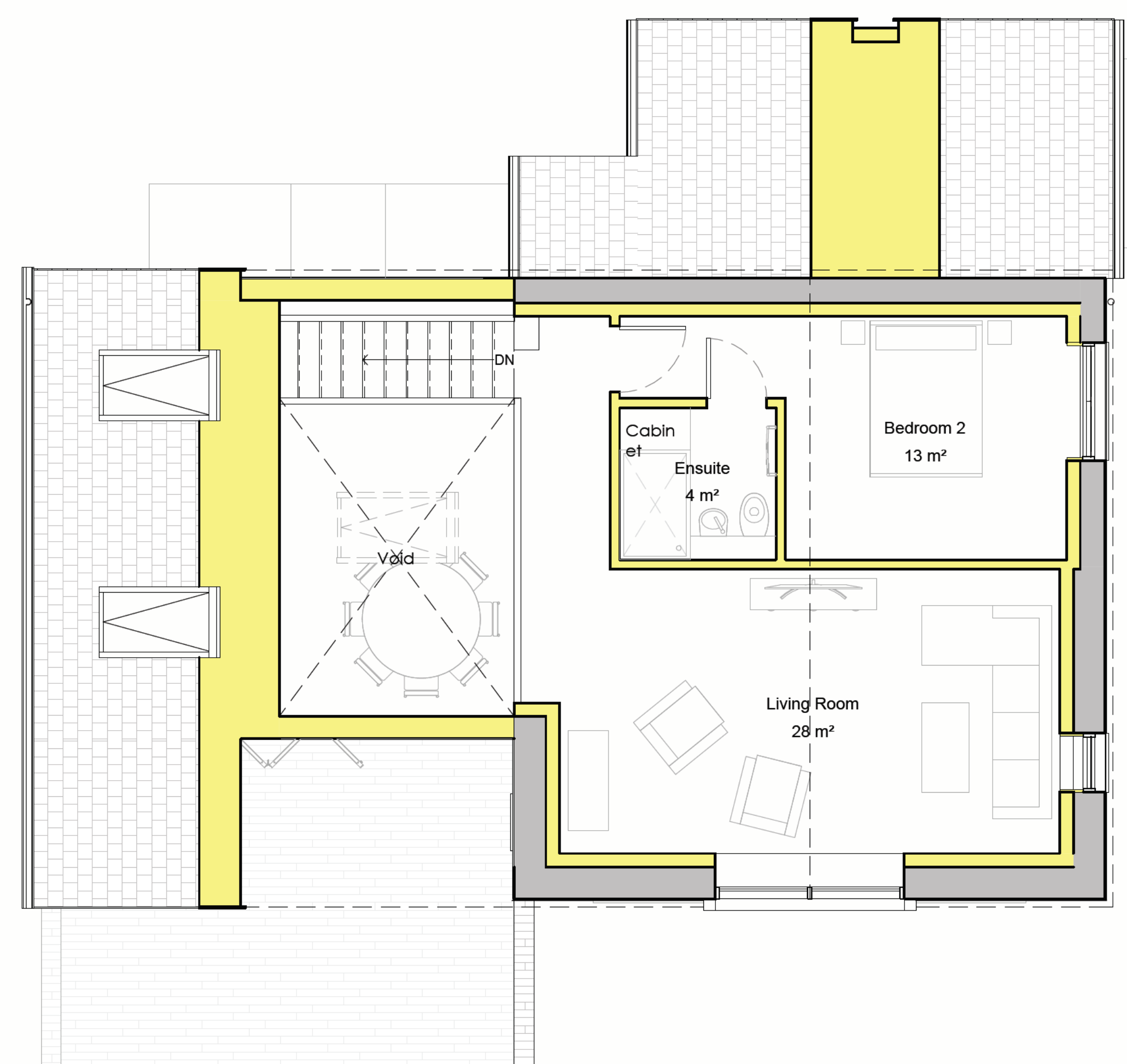
01674 675 610
 garry@garryadamarchitect.co.uk
 www.garryadamarchitect.co.uk

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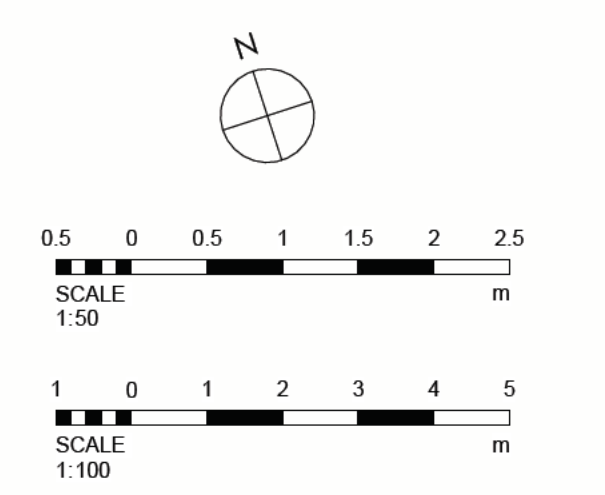
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6 Proposed Ground Floor Plan
1 : 50



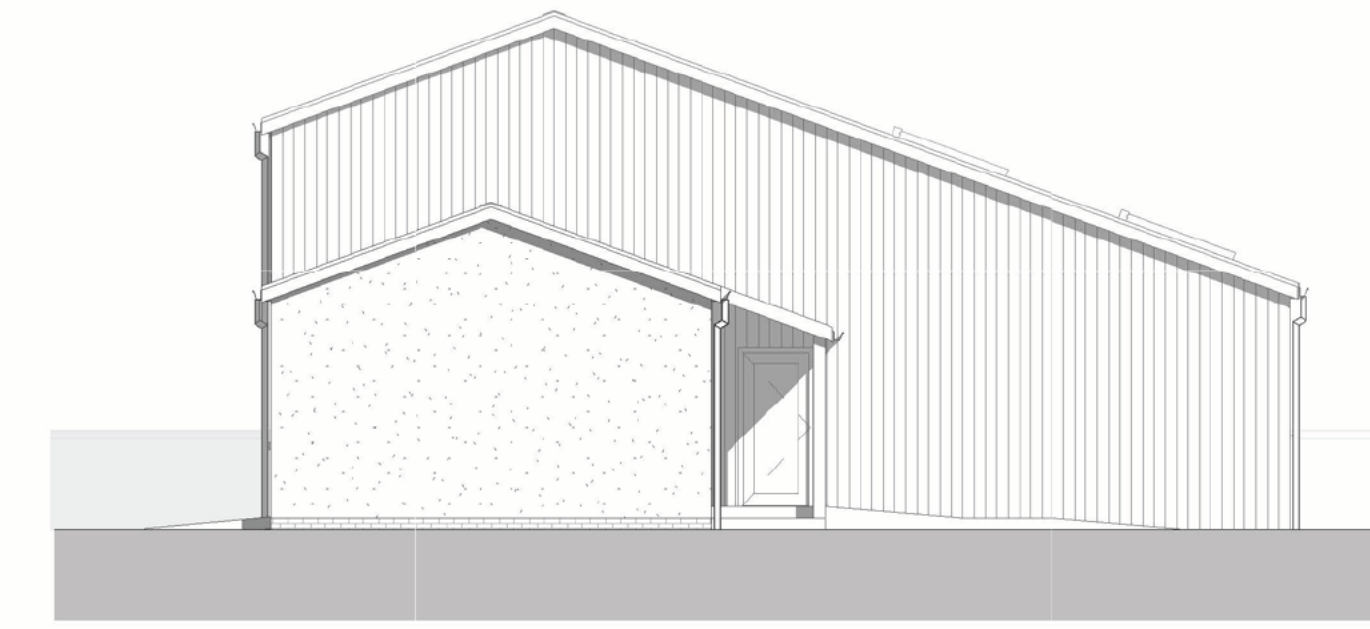
7 Proposed First Floor Plan
1 : 50



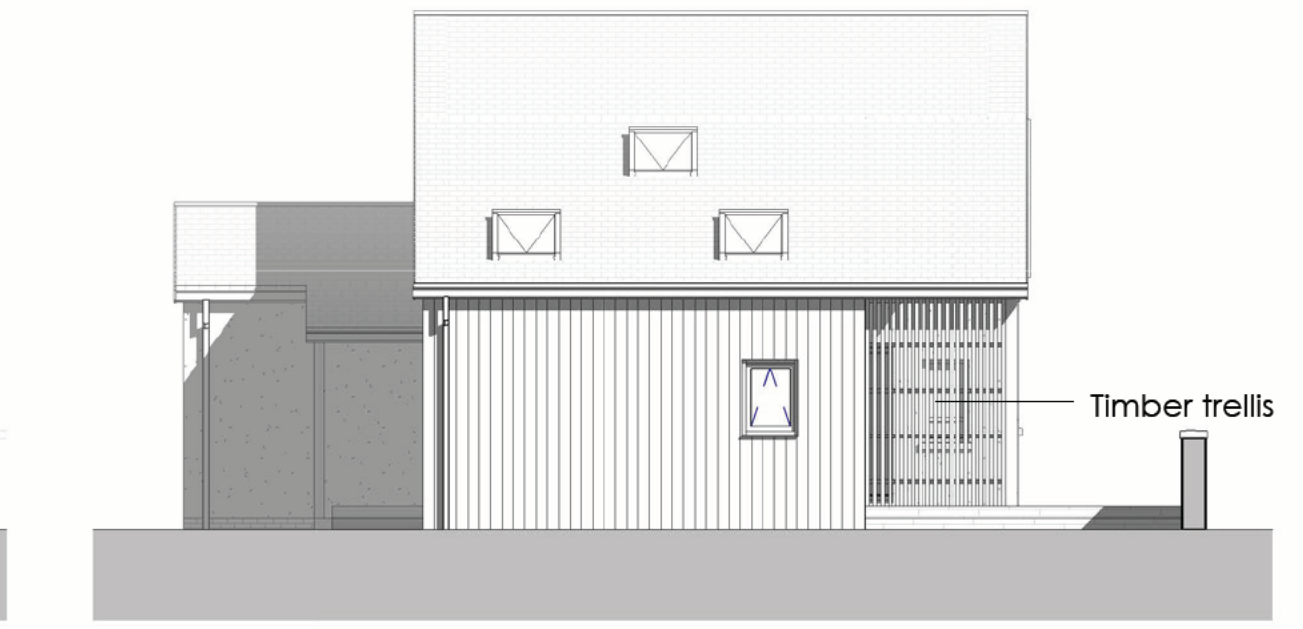
1 Proposed South Elevation
1 : 100



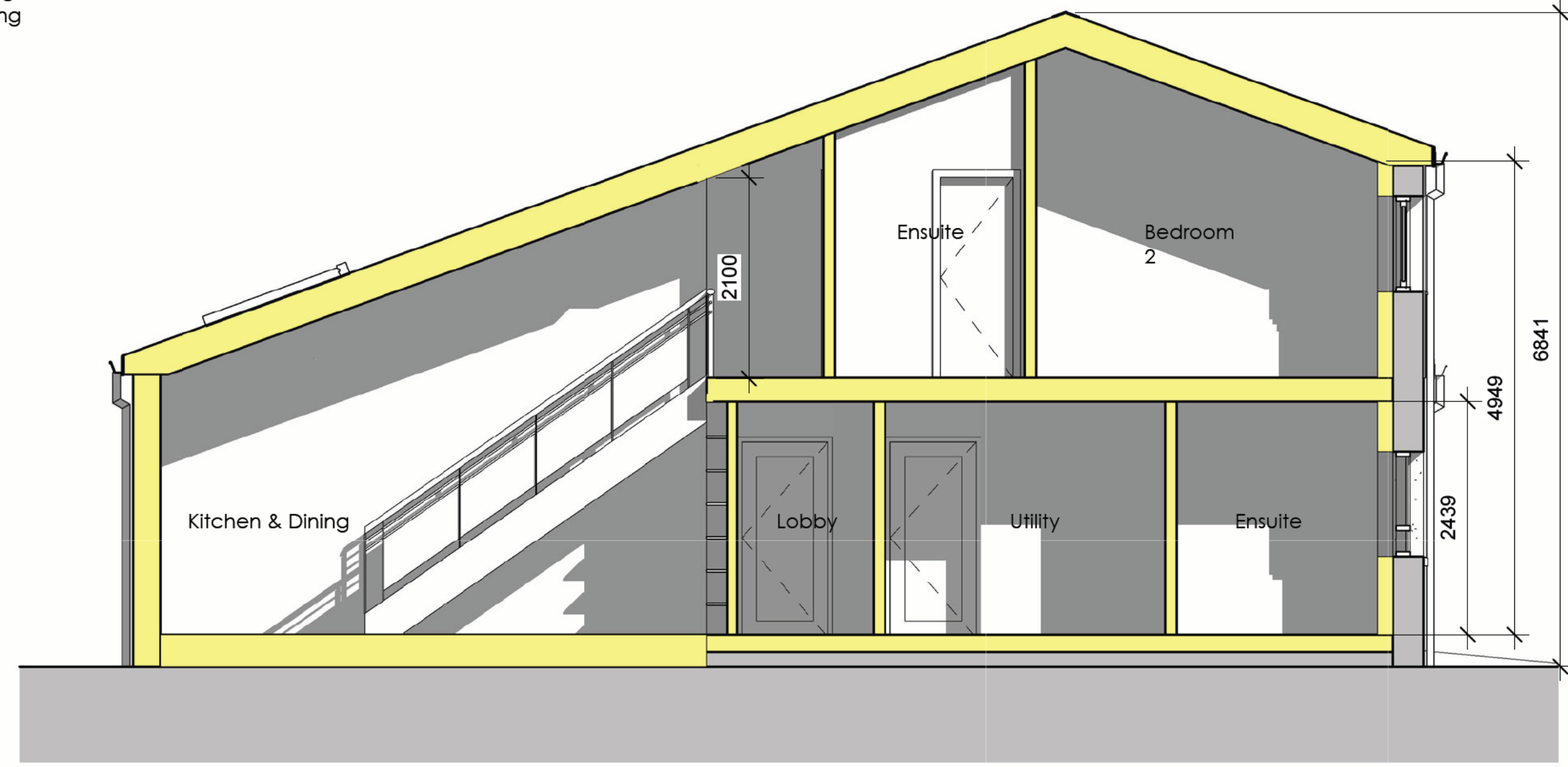
4 Proposed East Elevation
1 : 100



3 Proposed North Elevation
1 : 100



2 Proposed West Elevation
1 : 100



5 Proposed Section
1 : 50

Rev B - Ammended Label Error

Planning		
Project Carnoustie Coastguard Station		
Title Proposed Plans, Elevations & Section		
Job No. 257	Rev B	Drawing No. PD01
Scale 1:100 1:50	Paper A1	Date July 2021
2A Orange Lane, Montrose, DD10 8ND 01674 675 610 garry@garyadamarchitect.co.uk www.garyadamarchitect.co.uk		

From:Paul R Clark

Sent:25 Aug 2021 15:56:16 +0100

To:James Wright

Subject:Consultation response - 21/00590/full - site at Coastguard Station, 35 Admiral Street, Carnoustie

I refer to your consultation regarding the above planning application.

The track to the south of the site is designated Core Path 166 (Links Parade to Shore Row), and is also part of National Cycle Route 1. The site is currently accessed from the core path. It is however desirable to minimise future vehicular use of the route, given its high levels of use by walkers and cyclists.

The proposal to provide vehicular access from the existing parking to the east of the site is welcome. However if the existing entrance and hardstanding are retained, as currently proposed, there appears to be nothing to stop future occupants from using the path as a the primary vehicular access. It would be preferable if this entrance was restricted to pedestrians only.

Best regards

Paul Clark | Countryside Access Officer | Angus Council | 01307 491863 | clarkpr@angus.gov.uk | www.angus.gov.uk

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From: [Garry Adam](#)
To: [James Wright](#)
Cc: [REDACTED]
Subject: RE: 21/00590/FULL - Admiral Street, Carnoustie - Extension of Time
Date: 18 October 2021 08:35:30

Thanks James,

This time line is acceptable. I look forward to receiving some further design feedback to enable us to consider matters further.

Many thanks

Regards Garry

From: James Wright <WrightJ@angus.gov.uk>
Sent: 18 October 2021 08:30
To: Garry Adam <Garry@garryadamarchitect.co.uk>
Subject: 21/00590/FULL - Admiral Street, Carnoustie - Extension of Time

Mr Adam,

I refer to our telephone discussion last week and the request for an extension of time on this application to allow further discussions.

I am happy to agree to this request and would suggest we agree an extension to the determination date until the 22/11/21 in the first instance. Please confirm by response if this is acceptable and I will formally publish this extension on the website.

Regards

James Wright | Planning Officer (Development Standards) | Angus Council | 01307 492629 | WrightJ@angus.gov.uk | www.angus.gov.uk

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From: [James Wright](#)
To: garry@garryadamarchitect.co.uk
Cc: [REDACTED]
Subject: RE: 21/00590/FULL - Admiral Street, Carnoustie
Date: 18 October 2021 08:40:00

Mr Adam,

Thank you for your e-mail. I also refer to our recent discussions last week and I have now sent through a request for an extension of time to the determination date as you requested.

With regards to the other comments, I note that you consider your proposal similar to a householder application to the west (18/00869/FULL refers), however as discussed I do not agree that planning feedback is not reflected consistently in this instance.

Whilst you have pointed to extracts in the previous committee report, this was a householder application. Notwithstanding the main policy / design differences, from reviewing the file there appear to be other key differences including that the agent appeared to provide drawings that emphasised that the existing ridge height was a key consideration in their design and extra accommodation appears to have been provided by reducing ground levels. Both of these factors are materially different to the current proposal and I don't think the two applications are directly comparable. I do not intend to go through all details in the report and compare these as I would agree with the extract of the report you provided that each proposal must be considered on its own merits in terms of the policy context.

The existing site characteristics have been taken into account and it is our view that the design of the current proposal is deemed to be out of character with the area. We would fully address our reasons for any decision in a Report of Handling.

However I note you have asked for some more detailed feedback on the design and layout of the current site. I will try to provide you with some more comments on this as soon as I can.

I trust this clarifies. Any queries please call.

Regards

James Wright | Planning Officer (Development Standards) | Angus Council | 01307 492629 |
WrightJ@angus.gov.uk | www.angus.gov.uk

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From: Garry Adam <Garry@garryadamarchitect.co.uk>

Sent: 11 October 2021 16:39

To: James Wright <WrightJ@angus.gov.uk>

Cc: [REDACTED]
[REDACTED]

Subject: RE: 21/00590/FULL

Afternoon James,

Thank you for your email of 6th October. I was on holiday last week, so today is my first day back at work. I would like to respond to your email and seek clarification on a number of areas as I am surprised by your comments. I would also like to request further time for my clients to seek advice on the matter, as 7 days is not sufficient time to enable my clients to reach a decision as to whether they would like the application determined or whether they wish the application withdrawn.

To understand our confusion, perhaps it would be helpful to refer to the neighbouring planning decision. Feedback provided in their approval of 10 Seabrae application no 18/00869/FULL. No. 10 Seabrae is separated by only one residential dwelling along the coast from our application site. Both have a south boundary on the foreshore and are similarly sitting around 45 metres back from the beach head. I have outlined a couple of areas where Planning comment on the Seabrae application which appears to be in contradiction to feedback on our application:

“The existing house sits on a frontage site and there is therefore no imperative reason why development should be restricted to single storey notwithstanding assertions made in letters of representation. The properties located closest to the foreshore in Carnoustie are varied in size and type and as previously mentioned, increasingly have been significantly altered to reorient them to a south facing outlook unless they have originally been designed in that manner in the first instance. In terms of impacts on the character and appearance of the existing dwelling, the extension would be transformational however there is no significant merit in the original dwelling and its substantive alteration would therefore positively impact on the wider area.”

The property at 10 Seabrae was previously a single storey 2 bed bungalow, the property was 70sqm and was approved to be increased to 178sqm in size, over at least two storeys, with 145sqm of amenity space on a site of 400 sqm. The planner commented on the Seabrae application:

“The proposal would undoubtedly result in a radical change in the style of the property. It does not however naturally follow that radical change is equal to negative change and on that basis the proposal needs to be considered on its own merits in terms of the policy context referred to above and in terms of the Council’s published guidance on householder development.”

“The level of development is consistent with modern plot ratios for new build houses within development boundaries and would not be at odds with the varied nature of plot ratios both on Seabrae and in the wider area.”

The Coastguard station is very similar to the original building and plot at Seabrae, in that it is a single storey dwelling, around 50sqm existing, and our proposal is to increase to around 120sqm. Our proposal provides for 155 sqm of amenity space and is sat within a site of 330sqm.

In relation to the planning feedback on a lack of turning and being reliant on land out with the site (which is unadopted) for turning. Angus Council Roads (Traffic) have raised no objection to

our application. In the case of the Seabrae application, which was also using unadopted land out with their site to turn, the planner comments were:

“The formation of such an access onto an unadopted track is not subject of planning control and is considered to represent no more of a hazard to road safety or a burden in terms of its impact on the road surface than any of the other vehicular accesses on the street. The street is such that high vehicular speeds are unlikely to occur. The application has been reviewed by Angus Council Roads (Traffic) who raise no objection to the proposal in terms of parking standards or road and pedestrian safety.”

I hope the above explains why we feel the planning feedback is not reflected consistently, and would welcome more clarity on this prior to the determination date.

Thank you for your time, and we look forward to hearing from you.

Regards Garry Adam

From: James Wright <WrightJ@angus.gov.uk>

Sent: 06 October 2021 19:07

To: Garry Adam <Garry@garryadamarchitect.co.uk>

Subject: 21/00590/FULL

Change of use and extension of the former HM Coastguard Service building to a domestic dwellinghouse at Coastguard Station, 35 Admiral Street, Carnoustie, DD7 6BA

Mr Adam,

I refer to the above application. This has now been fully assessed and I would comment as follows.

Unfortunately there are concerns with the current design and scale of the building on this relatively small site. Policy TC2 states that proposals within development boundaries must be consistent with the character and pattern of development in the surrounding area and policy DS3 also emphasises this. The existing building on the site and the surrounding buildings in close proximity along the cycle path are small in scale and single storey in appearance. The character of the area appears to have larger more traditional properties set back with any development forward of these properties being smaller in scale and single storey in height. It is considered that the current proposal due to its height, scale, massing and design would look out of context with neighbouring properties and would not be in keeping with the character of the area. The current proposal is replacing a small scale building on the site with a large building which is of a design that is not in keeping with its surroundings.

This is a fairly large building footprint proposed on the site which also leads to a lack of turning space with the site for the parking area or garage and is reliant on land outwith the site.

In summary, unfortunately I consider the proposal to be contrary to policy (policies DS3, TC2 of the Angus local development Plan and the Design Quality and Placemaking supplementary Guidance) in this instance.

On this basis I would suggest that you consider withdrawing the current application and

reconsider this proposal. Should you wish to withdraw the application I would be grateful if you could let me know within 7 days from the date of this e-mail. After this date we will have to progress this application to determination.

Regards

James Wright | Planning Officer (Development Standards) | Angus Council | 01307 492629 | WrightJ@angus.gov.uk | www.angus.gov.uk

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From: [James Wright](#)
To: garry@garryadamarchitect.co.uk
Subject: FW: Coastguard Station, Admiral Street, Carnoustie 21/00590/FULL
Date: 08 November 2021 08:24:00
Attachments: [257 PD01 Rev B Proposed Plans, Elevations & Sections 211021.pdf](#)

Mr Adam,

I refer to the above application and the amended design you have submitted for comment.

I have reviewed this design but unfortunately the amended proposal wouldn't materially change our position this. The design does not address the points in my original e-mail of the 06/10/21 and my view is that this should be reconsidered.

My view is that a smaller dwelling with ridge running parallel to the cycle track and following the scale of the existing building is more likely to be acceptable as a solution.

Whilst I appreciate the above will not be the comments you had hoped for on this application, we will need to progress the application as submitted to determination. To confirm we cannot take the attached amendments as changes to the current scheme submitted.

On this basis I would be grateful if you could give me an indication as to how you wish to proceed. The application as submitted either needs to be withdrawn or we will have to progress it to determination as submitted.

Regards

James Wright | Planning Officer (Development Standards) | Angus Council | 01307 492629 | WrightJ@angus.gov.uk | www.angus.gov.uk

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From: Garry Adam <Garry@garryadamarchitect.co.uk>
Sent: 22 October 2021 15:46
To: James Wright <WrightJ@angus.gov.uk>
Subject: Coastguard Station, Admiral Street, Carnoustie 21/00590/FULL

Afternoon James,

Having discussed the project further with my clients, please find attached an amended design for your comments/consideration. We have introduced a number of changes:

- The plan is essentially the same but the stair pushes deeper in to the plan to allow the roof height to be lowered. This results in a significant height reduction from 6841mm to

5597mm. The ridge of the proposed design is only ~100mm higher than the existing shed.

- In order to achieve this height reduction, we have also moved to a new build approach, reusing the brownfield footprint rather than reworking the existing building walls. The floor was formerly insulated on top of the existing floor slab, then anhydrite screed, then 20mm floor finish. By rebuilding we have set the proposed FFL at 150mm above the external ground level. This contributes to the overall height reduction.
- Porch added due to the staircase being moved.
- In terms of the architecture we have introduced the curved roof as a conscious design move to lower the height of the building and give a contemporary approach to the architecture. The lowering of the building is intended to reduce the building's impact on overshadowing.
- The curved form makes a nautical reference to its seaside location, since the building's original purpose had a strong connection with the sea, it felt that a reuse of a coast guard station, brownfield redevelopment which tries to make a connection with its seaside location both through the curved form and large upstairs windows with their zinc framing, is appropriate in this instance. I notice in taking the train from Montrose to Dundee that there are an increasing number of houses which take on more contemporary materials and roof forms along the Tay edge and am encouraged by this diversity and fresh architecture. The immediate context, as previously acknowledged in Planning reports, recognises that there are various sizes and forms and ages of building. Houses on the seafront increasingly address their seaside frontage.

I hope you can accept that the revised design has made a significant effort to address the points raised in your email and I look forward to receiving your feedback.

Please call if you would like to discuss or if I can be of further assistance.

Many thanks

Regards Garry Adam

Garry Adam Chartered Architect Ltd

2a Orange Lane

Montrose, DD10 8ND

01674 675 610

garry@garryadamarchitect.co.uk

www.garryadamarchitect.co.uk

From: [Garry Adam](#)
To: [James Wright](#)
Cc: [REDACTED]
Subject: RE: Coastguard Station, Admiral Street, Carnoustie 21/00590/FULL
Date: 15 November 2021 13:48:34

Afternoon James,

Thank you for your email of 8th November. I have discussed your feedback with my clients and have the below comments.

In your email of 6th October you do not raise any concerns in relation to the principle of residential development on this now vacant brownfield site, therefore we assume you agree the principle of development on this site is acceptable to you/ the local planning authority unless by return you advise otherwise.

In your email of 6th October you do not disagree with the assessment that this application meets the economic and social aspects of sustainable development. Therefore unless you advise otherwise we assume you agree with the merits of the planning application in this respect.

In our consideration of the application, we have taken full account of policy TC2 and DS3, the supplementary guidance for design and placemaking, as well as the other necessary policies and supplementary guidance notes required. As such, I would like to draw your attention to a number of elements for your further consideration:

The site measures 330 m². The proposed development would have a building coverage on the plot of 94.2 m² plus 18.5 m² for the garage. There is 217.3 m² of free space, including the provision for off street parking, and ample space for bin storage within the curtilage. In addition there is 155 m² of amenity space, which exceeds the general minimum requirement of 100 m² of amenity space. The level of development is consistent with modern plot ratios for new build houses within development boundaries and would not be at odds with the varied nature of plot ratios both on Admiral Street and the wider area.

We have modified elevations and finishes to compliment rather than detract from the local identity, whilst creating a distinct character to retain and strengthen a sense of place. The proposed dwelling would utilise established traditional forms such as rectilinear plan forms and a pitched roof consistent with those in the area. We believe the resulting dwelling would respond well to its surroundings and is orientated and emphasised to capitalise on the unbroken sea views to the south. This is a consistent feature with many properties in the area, some of which have been reoriented to a south facing emphasis which is understandable given the nature of the southerly aspect in the area, the views it offers, as well as the opportunity to capitalise on the solar gain.

As the dwelling abuts a public space and cycle route, we have sought to deliver an attractive building that uses high quality and complimentary materials. We have ensured the principal elevation of the building faces onto the public space to provide an active frontage and natural surveillance. We have also altered the parking arrangements to create a safer environment with its connection to the cycle path, street and foot paths.

As stated by you/local authority in previously approved foreshore applications, the properties located closest to the foreshore in Carnoustie are varied in size and type and increasingly have been significantly altered. We do not believe there is any significant merit in the existing building, and its substantive alteration should positively impact and enhance the character of the wider area.

In terms of overlooking and privacy impacts, the development has been orientated so that it is in accordance with the councils published guidance on window distances and distances between windows and blank walls.

Taking account of the existing impacts from the building, surrounding properties and their boundary treatments, the proposal would represent marginal increases in terms of shadow throw, as demonstrated by the submitted shadow study.

In your email of 18th October you raised ridge height as a concern. We are disappointed you were not willing to consider the amendments in drawing 257 PD01 Rev B Proposed Plans, Elevations & Sections submitted on 22nd October 2021 as changes to the current scheme. These amendments reduced the ridge height of the proposed building to within 100 mm of the existing building.

Notwithstanding the above, the supplementary guidance for design and placemaking states that buildings may increase in height to mark landmark buildings. The Coastguard Station has been on this site for over 100 years, and despite the current building not being of this age, it could certainly be considered a landmark building and site.

You suggest in your email of 8th November that, in your view a smaller dwelling with ridge running parallel to the cycle track and following the scale of the existing building is more likely to be acceptable as a solution. Whilst we appreciate your opinion, design concerns and in particular design matters can of course be subjective and subject to interpretation. This suggestion is also not consistent with the varied properties in the locality or with the desire of planning policy, including the published Carnoustie, Monifieth and Sidlaw Locality Plan, which seeks to improve and enhance the physical appearance of the coastline.

The Angus Local Development Plan sets out that the Council will take a positive approach when considering development proposals and will work proactively with applicants to find solutions which mean that proposals that will, on balance, improve the economic, social and environmental conditions in the area can be supported.

You suggest the application as submitted either needs to be withdrawn or you will have to progress it to determination as submitted.

Any such withdrawal would incur further time delay, duplicate administration duties by the authority having to re-register the application, duplicate consultation procedures etc and thus we cannot comprehend how this will aid the authority. Particularly when resources are clearly stretched, as per an email received on 21st October from Alan Hunter titled ' Briefing note for planning agents regarding Angus Council development management service'.

My clients and I believe we have considered and addressed the necessary policies in the

submission of this application and do not wish to withdraw the submission.

Many thanks
Regards Garry Adam

From: Garry Adam
Sent: 09 November 2021 08:22
To: James Wright <WrightJ@angus.gov.uk>
Subject: RE: Coastguard Station, Admiral Street, Carnoustie 21/00590/FULL

Morning James,
Thank you for his comments which I will take back to my clients and I shall come back to you as soon as possible to let you know how they would like to proceed.
Regards Garry

From: James Wright <WrightJ@angus.gov.uk>
Sent: 08 November 2021 08:25
To: Garry Adam <Garry@garryadamarchitect.co.uk>
Subject: FW: Coastguard Station, Admiral Street, Carnoustie 21/00590/FULL

Mr Adam,

I refer to the above application and the amended design you have submitted for comment.

I have reviewed this design but unfortunately the amended proposal wouldn't materially change our position this. The design does not address the points in my original e-mail of the 06/10/21 and my view is that this should be reconsidered.

My view is that a smaller dwelling with ridge running parallel to the cycle track and following the scale of the existing building is more likely to be acceptable as a solution.

Whilst I appreciate the above will not be the comments you had hoped for on this application, we will need to progress the application as submitted to determination. To confirm we cannot take the attached amendments as changes to the current scheme submitted.

On this basis I would be grateful if you could give me an indication as to how you wish to proceed. The application as submitted either needs to be withdrawn or we will have to progress it to determination as submitted.

Regards

James Wright | Planning Officer (Development Standards) | Angus Council | 01307 492629 |
WrightJ@angus.gov.uk | www.angus.gov.uk

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From: Garry Adam <Garry@garryadamarchitect.co.uk>
Sent: 22 October 2021 15:46
To: James Wright <WrightJ@angus.gov.uk>
Subject: Coastguard Station, Admiral Street, Carnoustie 21/00590/FULL

Afternoon James,

Having discussed the project further with my clients, please find attached an amended design for your comments/consideration. We have introduced a number of changes:

- The plan is essentially the same but the stair pushes deeper in to the plan to allow the roof height to be lowered. This results in a significant height reduction from 6841mm to 5597mm. The ridge of the proposed design is only ~100mm higher than the existing shed.
- In order to achieve this height reduction, we have also moved to a new build approach, reusing the brownfield footprint rather than reworking the existing building walls. The floor was formerly insulated on top of the existing floor slab, then anhydrite screed, then 20mm floor finish. By rebuilding we have set the proposed FFL at 150mm above the external ground level. This contributes to the overall height reduction.
- Porch added due to the staircase being moved.
- In terms of the architecture we have introduced the curved roof as a conscious design move to lower the height of the building and give a contemporary approach to the architecture. The lowering of the building is intended to reduce the building's impact on overshadowing.
- The curved form makes a nautical reference to its seaside location, since the building's original purpose had a strong connection with the sea, it felt that a reuse of a coast guard station, brownfield redevelopment which tries to make a connection with its seaside location both through the curved form and large upstairs windows with their zinc framing, is appropriate in this instance. I notice in taking the train from Montrose to Dundee that there are an increasing number of houses which take on more contemporary materials and roof forms along the Tay edge and am encouraged by this diversity and fresh architecture. The immediate context, as previously acknowledged in Planning reports, recognises that there are various sizes and forms and ages of building. Houses on the seafront increasingly address their seaside frontage.

I hope you can accept that the revised design has made a significant effort to address the points raised in your email and I look forward to receiving your feedback.

Please call if you would like to discuss or if I can be of further assistance.

Many thanks

Regards Garry Adam

2a Orange Lane
Montrose, DD10 8ND

01674 675 610

garry@garryadamarchitect.co.uk

www.garryadamarchitect.co.uk

From: [Garry Adam](#)
To: [James Wright](#)
Cc: [REDACTED]
Subject: RE: 21/00590/FULL Coastguard Station, Admiral Street, Carnoustie
Date: 21 December 2021 17:01:56

Hi James,

Thank you for your email.

I have spoken with my client and they are going to decline the extension of time, as they intend to take the application to local review for non determination.

Many thanks

Regards Garry

From: James Wright <WrightJ@angus.gov.uk>
Sent: 21 December 2021 09:03
To: Garry Adam <Garry@garryadamarchitect.co.uk>
Subject: RE: 21/00590/FULL Coastguard Station, Admiral Street, Carnoustie

Mr Adam,

I refer to your e-mail below and I apologise for the delay in my response. I tried to call you to discuss this but was unable to get in contact.

As you are aware due to current staffing shortages, applications have been taking longer to deal with than normal. I again apologise for any inconvenience this has caused.

In terms of agreeing a date that a decision will be issued by, I would suggest that a realistic date (taking into account the holiday period) for determination is Friday 21/01/22. I will try to issue a decision as soon as possible but will aim to issue any decision by the 21/01/22. If for any reason a decision will not be issued within this timeframe, I will let you know as soon as possible.

I trust this is acceptable and would be grateful if you could confirm this by response. If I have not had a response by the close of business on the 23/01/21 I will assume this is acceptable and work on this basis.

If you do not agree to this timeframe please also confirm by response.

Regards

James Wright | Planning Officer (Development Standards) | Angus Council | 01307 492629 |
WrightJ@angus.gov.uk | www.angus.gov.uk

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From: Garry Adam <Garry@garryadamarchitect.co.uk>
Sent: 16 December 2021 16:51
To: James Wright <WrightJ@angus.gov.uk>
Cc: [REDACTED]
Subject: RE: 21/00590/FULL Coastguard Station, Admiral Street, Carnoustie

Hi James,
Do you have an update you can give me on the time line for this application please?
Many thanks.
Regards Garry

From: Garry Adam
Sent: 02 December 2021 13:45
To: James Wright <WrightJ@angus.gov.uk>
Subject: 21/00590/FULL Coastguard Station, Admiral Street, Carnoustie

Afternoon James,

I note that the determination date for the above planning application was 22nd November, and would be grateful if you could provide me and my clients with a decision in relation to this application at the earliest opportunity.

If you are still minded to refuse the application, my clients will require a full detailed report on why the application is refused and the proper reasons for such refusal.

Many thanks for your assistance.
Regards Garry

Garry Adam Chartered Architect Ltd

2a Orange Lane
Montrose, DD10 8ND

01674 675 610

garry@garryadamarchitect.co.uk
www.garryadamarchitect.co.uk



Countrywise

Isobel Davidson
Chapel Howe
Ardlethen
Ellon AB41 8PF

Tel 01358 722881
Mobile [REDACTED]
e-mail Countrywise@talktalk.net

Garry Adam Chartered Architect Ltd
2a Orange Lane
Montrose,
DD10 8ND

15/07/2021

Dear Garry

Former Coastguard Station Carnoustie – Bat roosting potential

I have looked at this site on 'Streetview' and aerial photographs and assess the habitat as poor for bats. I have also carried out a desktop search for records of bats within 2km of the site and there are no records although the area may be under recorded.

My assessment is that this building has practically no potential for bat because of its location and poor surrounding habitat and no surveys are required.

I am happy to discuss this and answer any queries.

Yours sincerely

[REDACTED]

Isobel Davidson
Bat Roost Visitor Licence No. 139616



257 Coastguard Station Carnoustie Design & Access Statements

Application for conversion and proposed extension to the former HM Coastguard Station.



Contents

Design statement

1. Introduction
2. Site and area appraisal
 - 2.1 Site history
 - 2.2 Planning history
 - 2.3 Contextual photograph survey
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 - 3.1 Proposed works
 - 3.2 Design Rationale
 - 3.3 Materials
 - 3.4 Energy

Access statement

4. Access statement
 - 4.1 Current access provision
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1. Introduction

This Design & Access Statement has been prepared in support of a full planning application for the former HM Coastguard Station in Carnoustie.

This documentation should be read in conjunction with the drawings submitted in the application as follows:

257 EX01 Existing Plan & Elevations 210719

257 LP01 Location Plan 210719

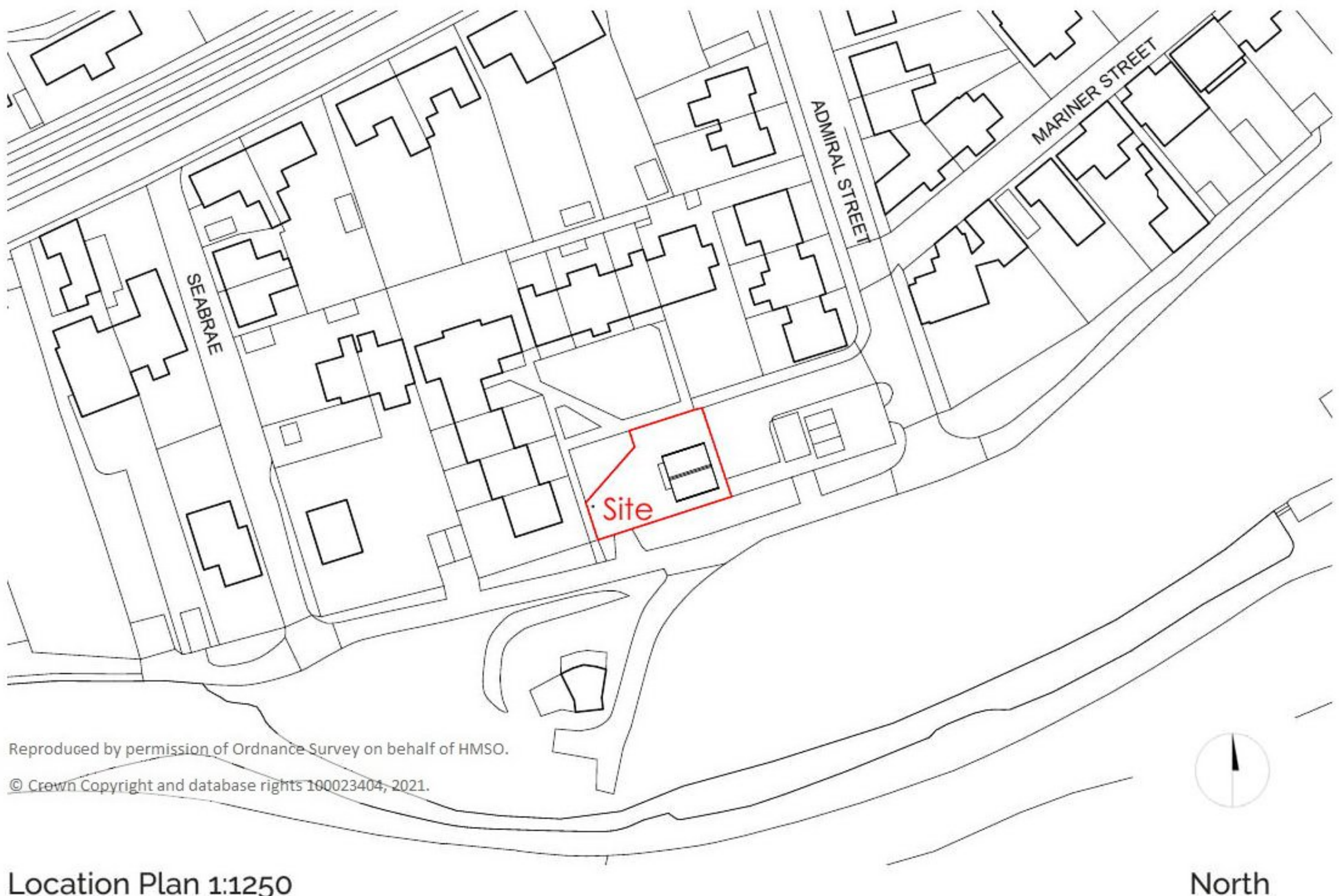
257 PD01 Rev A Proposed Plans, Elevations & Section 210719

257 PD02 Proposed 3D Visuals 210719

257 PD03 Overshadowing Analysis 210719

257 SP01 Rev A Proposed Site Plan 210719

2.0 Site and Area Appraisal



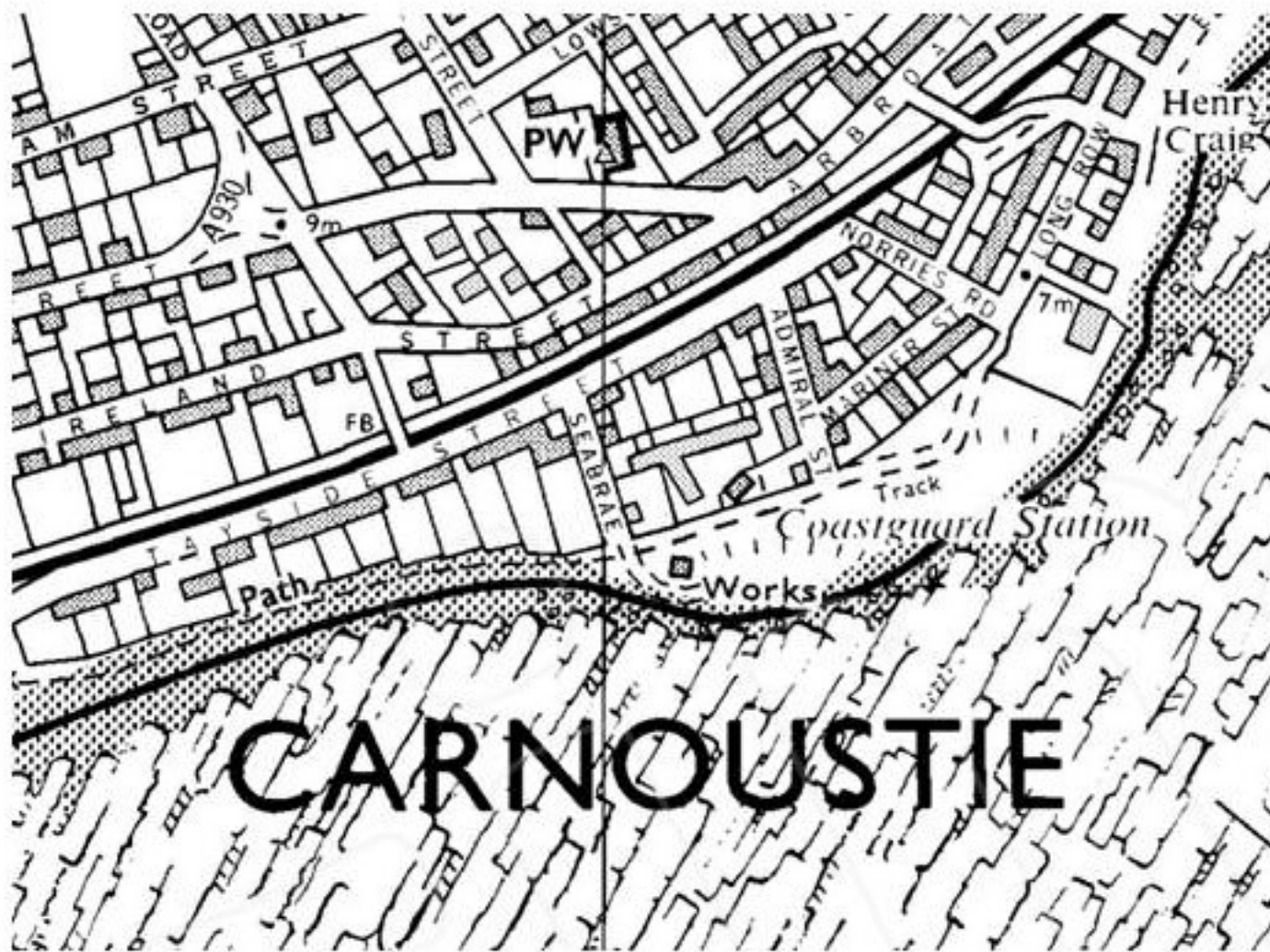
The Coastguard Station is located off Admiral street adjacent to the coastline and route 1 cycle path. It is currently disused and was formerly used by Her Majesty's Coastguard Rescue Service. The site area is 330m² and is currently serviced. The Coastguard Station has been vacant for numerous years. The site was recently purchased by our client with the intention of converting it to a family home.

The surrounding area is residential to the North and West of the Coastguard Station with small garages to the East. The neighbouring buildings vary in age and style with the single storey Bungalows to the West constructed in the 1990's and the two storey Victorian housing to the North dating back as early as 1900.

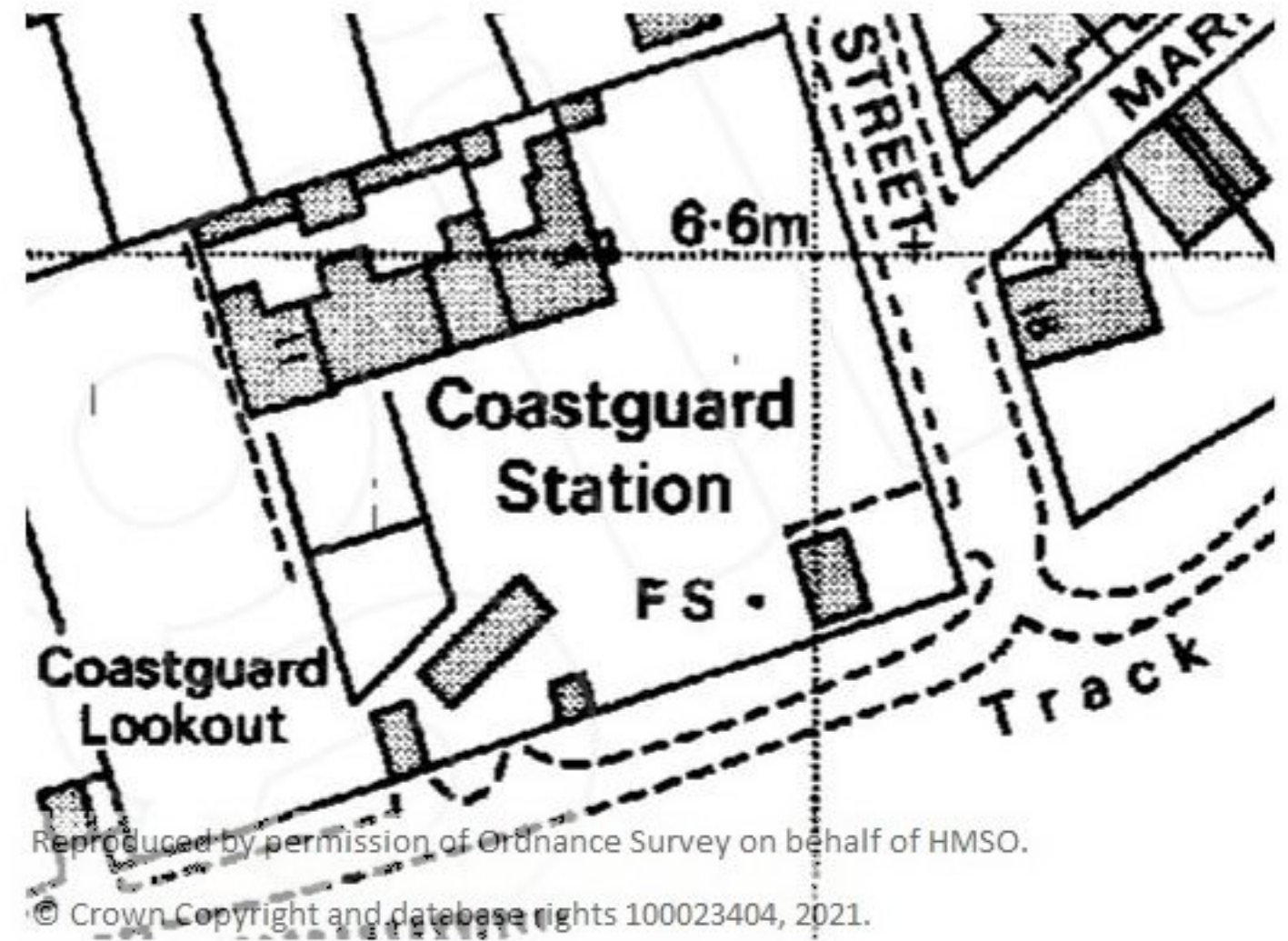
The site boundary is a timber fence roughly 1800mm high that surrounds the West and North perimeter of the site, with public parking to the East which currently hosts around four vehicles including a disabled parking space. The West side of the boundary is a low 1100mm high fence and at the South is a stone wall of similar height facing the coastline with an opening for vehicular access. At the South of the site is an existing route 1 cycle network path that is frequently used by cyclists and pedestrians.

Historical maps suggest the a Coastguard Station has been present on site since at least 1900, but was demolished and replaced with a new construction around 1999 which is the subject of this application.

2.1 Site History



1990 map extract from Digimap
Formation of housing to west of the site.



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1980 map extract from Digimap
Minor development of out buildings to the east of the site. (Note: no changes appear to be made on site between 1920-1980 maps.)



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1920 map extract from Digimap
Minor changes to the map indicating the location of the former Coastguard Station.



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1900 map extract from Digimap

The historical maps accessed via Digimaps.edina.ac.uk suggests there was a former Coastguard Station that sit diagonally on site from as early as 1900. It appears to have been demolished and replaced by the current Coastguard Station within this application which sits parallel with the boundary line following the below planning application dated June 1999.

2.2 Planning History

- 99/00560/FUL | Erection of Rescue Boat House | Coast Guard Station Admiral Street Carnoustie Angus DD7 6BA Available at: <https://planning.angus.gov.uk/online-applications/applicationDetails.do?keyVal=9900560FUL&activeTab=summary> [Accessed 26th July 2021]

The only record of any planning application on site was in June 1999 for the erection of a rescue boat house which was approved in July 1999. There are no active or recent applications on site or for the closely neighbouring properties.

2.3 Contextual Photograph Survey



Coastguard Station in context from South



Coastguard Station & existing boundary



Access from Admiral street



Access from Admiral street



Existing parking provision



Housing to the North of site



Existing cycle route and out buildings at East of site



Housing to the West of site

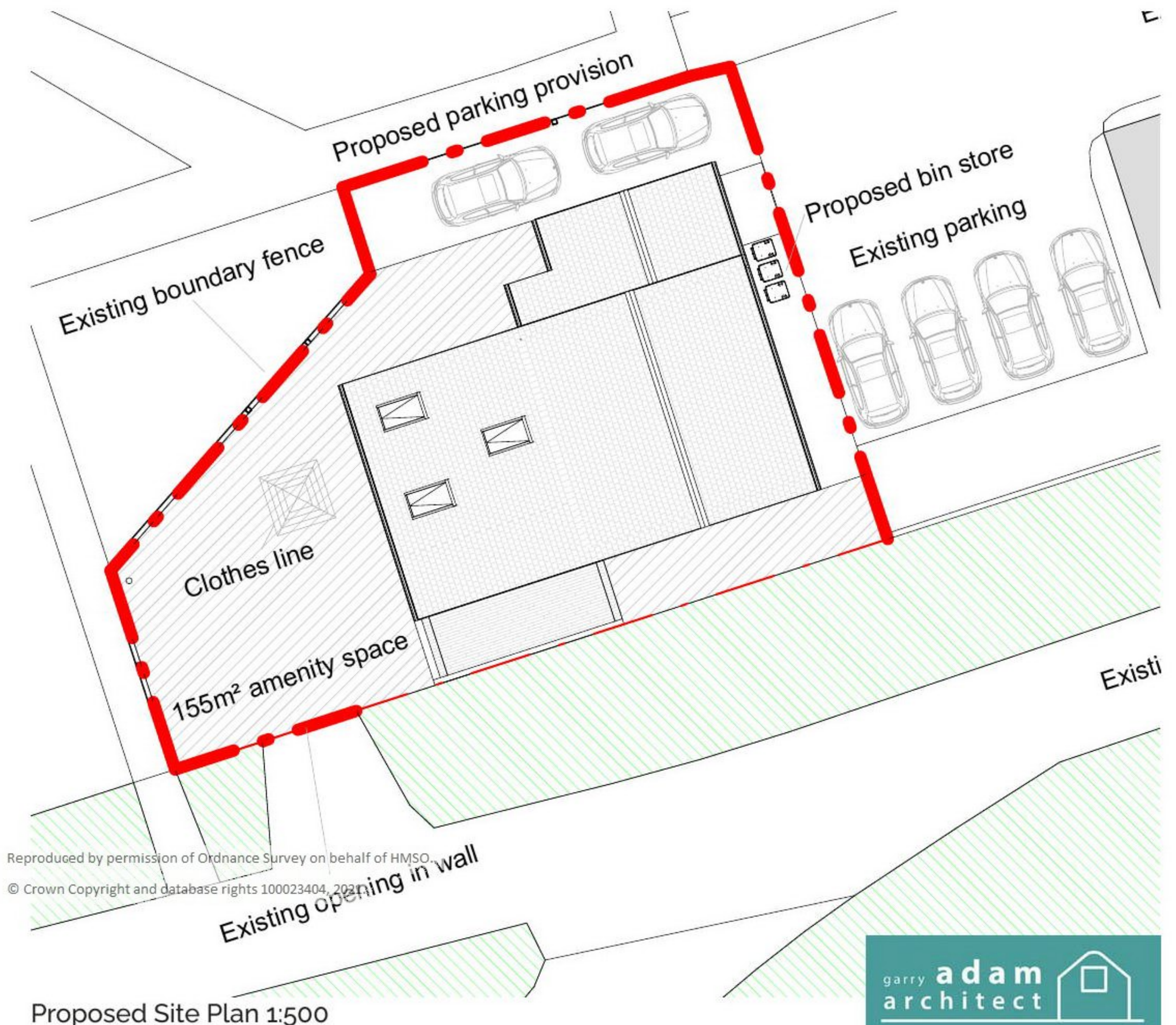
3.0 Proposed Works to the Coastguard Station

3.1 Proposed works

The existing Coastguard Station contains an internal garage for storing boats on the North end with its own garage door access, with a small office space, kitchen and wc facing South that can be accessed via the front door on the West elevation. The two spaces are connected internally via a standard timber door.

The Coastguard Station fabric consists of a masonry cavity wall construction with plaster-board internal lining for the office & WC. Externally there is a white rendered finish. The fascia and windows/doors are painted in blue with a tile roof and ridge cap.

The proposed accommodation is a two bedroom house with a ground floor kitchen/dining space, utility, study, wc, master bedroom suite and garage. The garage is positioned at the North of the site to provide direct access to the existing parking area and access road. The first floor contains the second bedroom with an ensuite and a living space. A patio door allows the kitchen/dining to open out to a sheltered patio facing Southward towards the sea views.

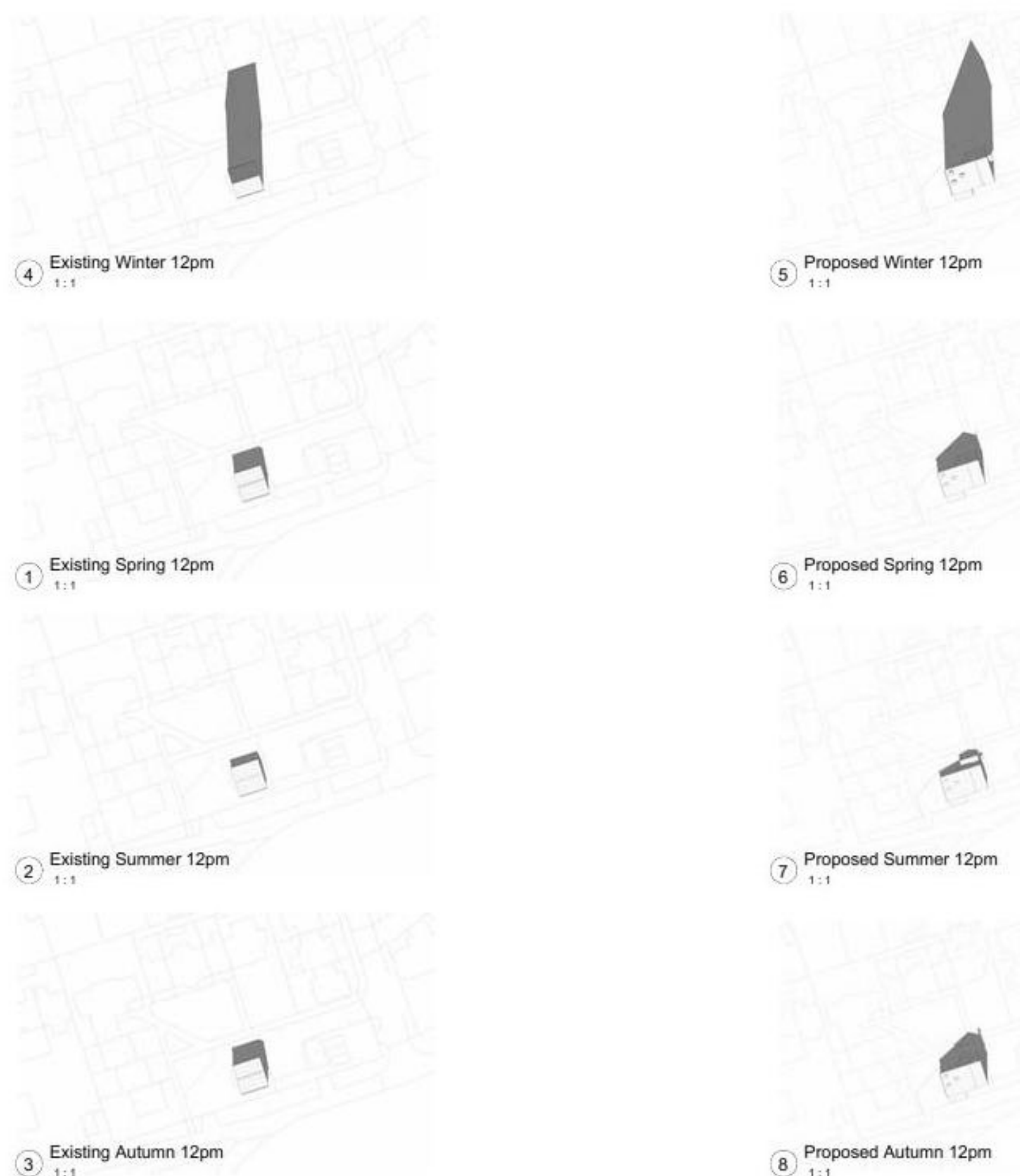


3.2 Design Rationale

The aim of the design is to create a sensitive and modest intervention to enable an appropriate change of use to a derelict building. Our aim is to form a house which will function well as a family home, while maintaining a modest and unimposing scale and presence on site. To minimise overshadowing on neighbouring properties, the new roof pitch is kept low. As seen in the overshadowing analysis below, there is very minor overshadowing in the neighbours gardens. This helps keep the scale of the proposal in line with the existing context. The existing walls of the original fabric are retained with a new slapping opening the existing to the proposed kitchen/dining space. The floor area of the extension is compact and smaller than the existing floor area to allow the existing footprint to be dominant.

All glazing has deliberately been positioned on the Southern and Eastern elevations to avoid any potential overlooking issues with neighbouring buildings with the exception of one small window on the west elevation for kitchen ventilation. The upstairs bedroom two and living space have emergency escape windows that face the parking on the East elevation. The site boundary remains unaltered with the proposed access using the existing access route via Admiral Street as photographed previously. This will be discussed further in this documentation under the access statement.

The proposed site arrangement allows the parking to be located at the North behind the house, which is purposely set back from the boundary fence to create distance between the neighbouring garden. The West of the site is left paved as existing which provides foot access via a new gate. The main garden space is located at the South for privacy from the neighbours and to maximise the potential of the views toward the landscape and the sea. This arrangement allows for 155m² of amenity space for the users.



Overshadowing analysis

3.3 Materials

The proposed extension uses Marley Eternit cladding and maintains the existing rendered finish on the existing exterior walls. The proposed garage is a rendered finish to match the existing. The roof material is tile to match the existing roof. The extension utilizes a timber construction and existing walls will have a new internal lining. The existing concrete floor slab is retained and built upon to improve the thermal efficiency of the floor. The new floor construction for the extension will meet the finished floor level of the existing.

3.4 Energy & Sustainability

The proposal aims to retain as much of the existing building as possible with minimal alterations to the remainder of the site. The south elevation is heavily glazed to maximise solar gain and to permit quality daylight to the internal living spaces. A new internal lining is proposed to improve the thermal efficiency of the existing walls, while the new extension uses a highly insulated timber kit construction. This should help lower the running costs of the proposal. The proposal has a compact footprint and a lowered roof which both assist in the energy efficiency of the building while allowing into to not create contention with the neighbouring properties. The proposal will utilize an air source heat pump (ASHP) for the heating of the water and the internal spaces.

4.0 Access Statement

4.1 Current access provision:

Currently, the site can be accessed via Admiral street, where there is parking provision for four vehicles including a disabled space. The user can then access the property via a small timber gate on the north boundary. Alternatively, there is vehicular access via the route 1 cycle path to the front (South) of the property. The site does not currently have an accessible entrance. The site is flat with no noticeable level change.

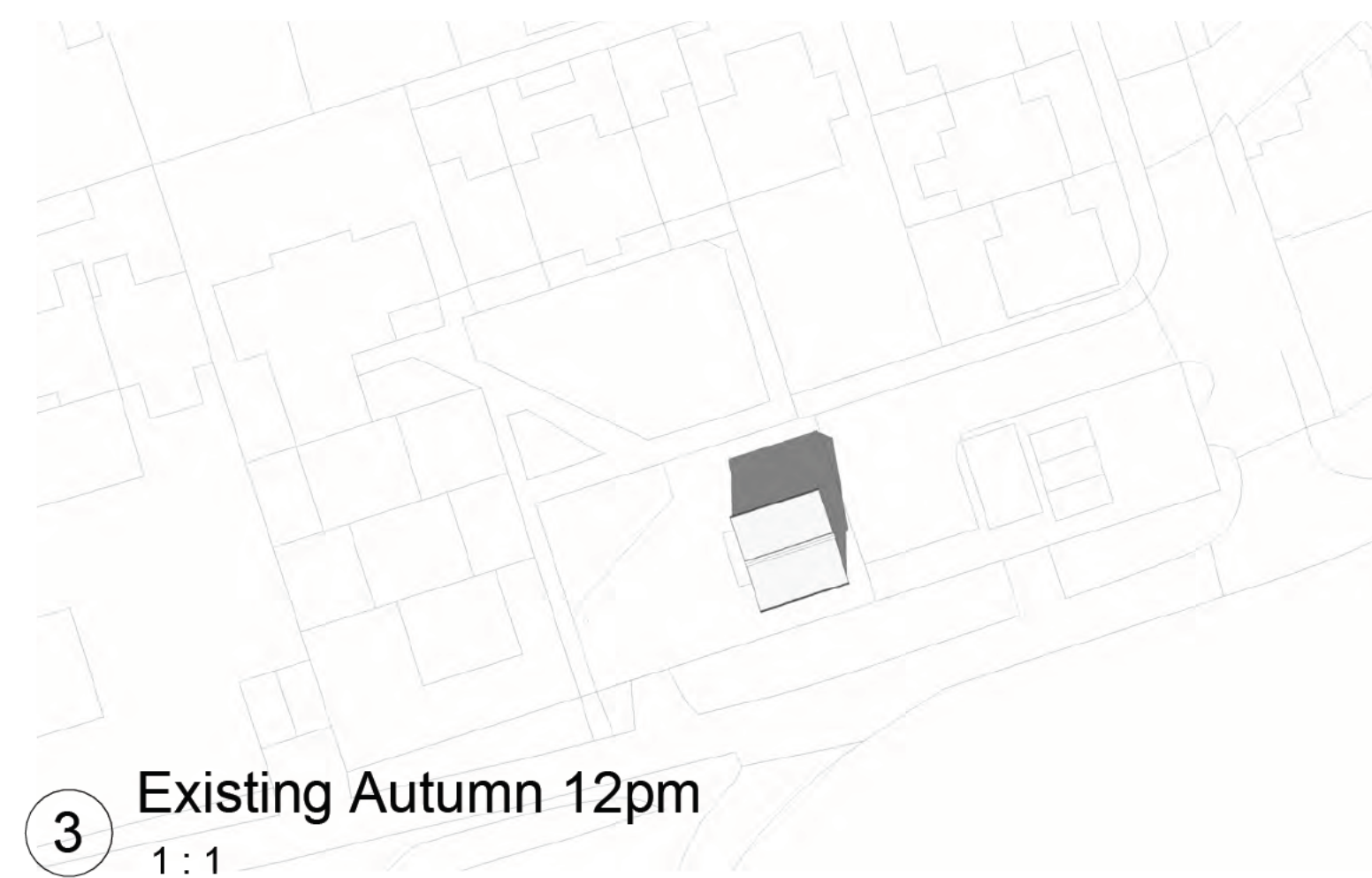
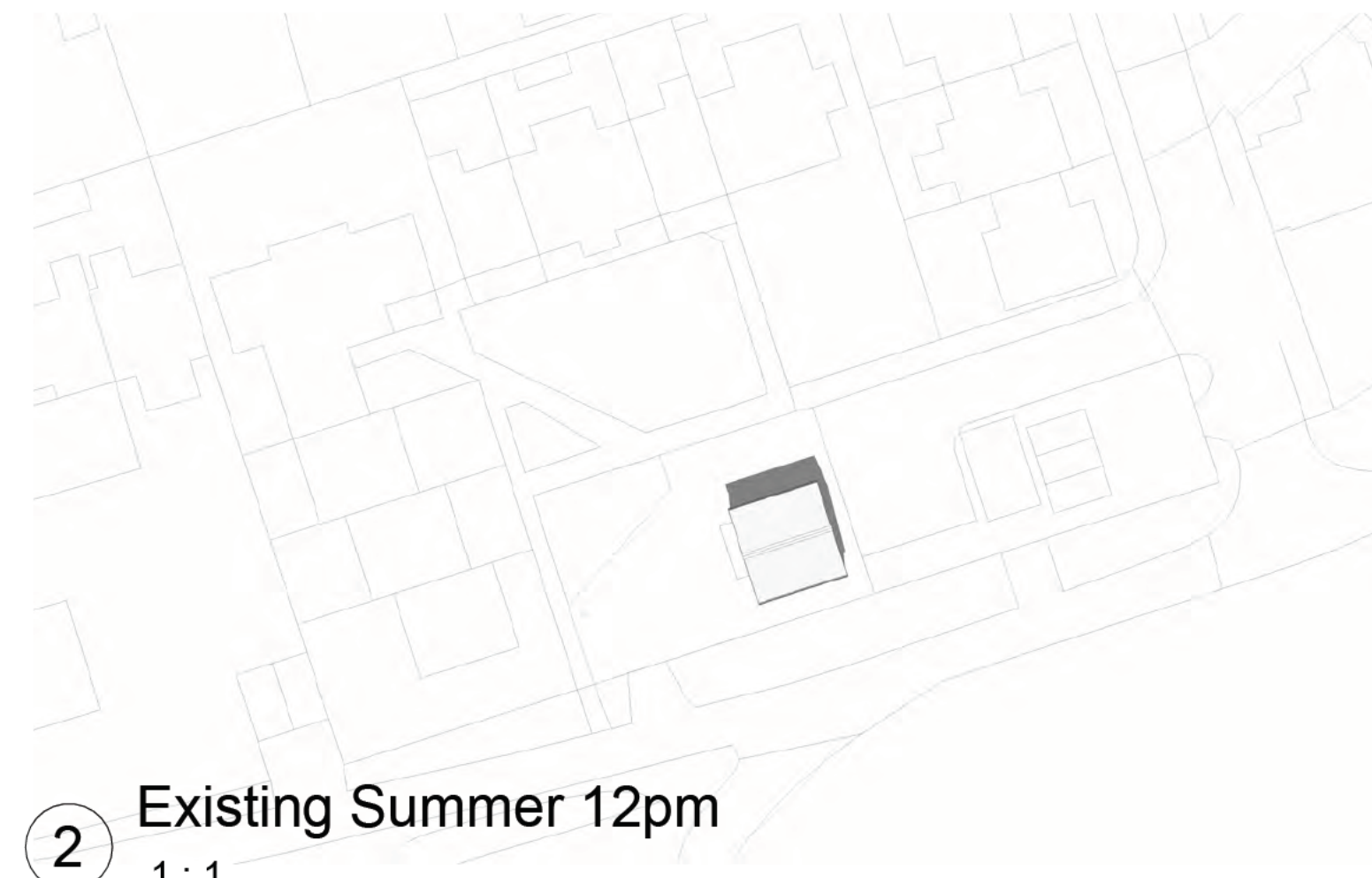
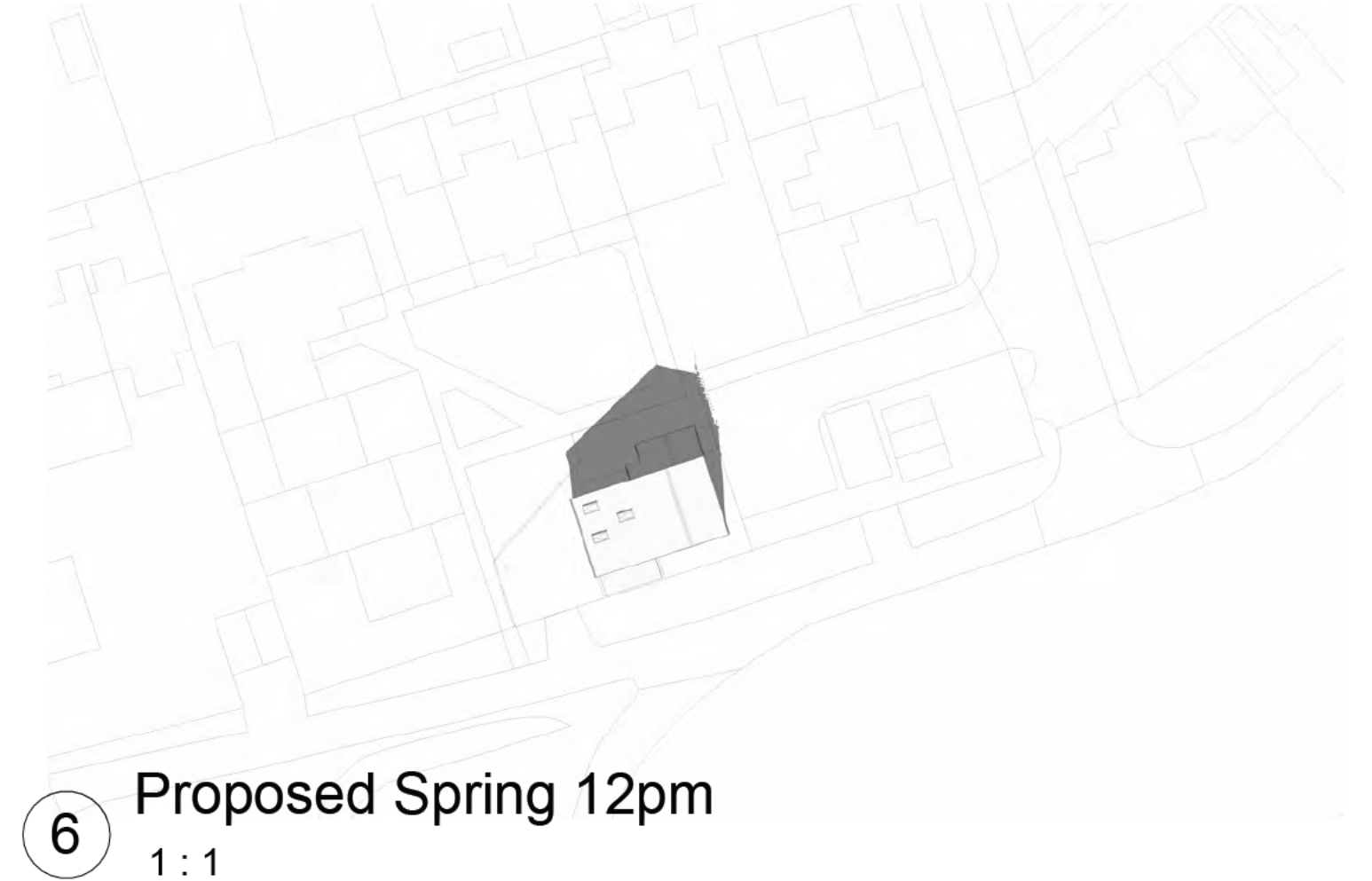
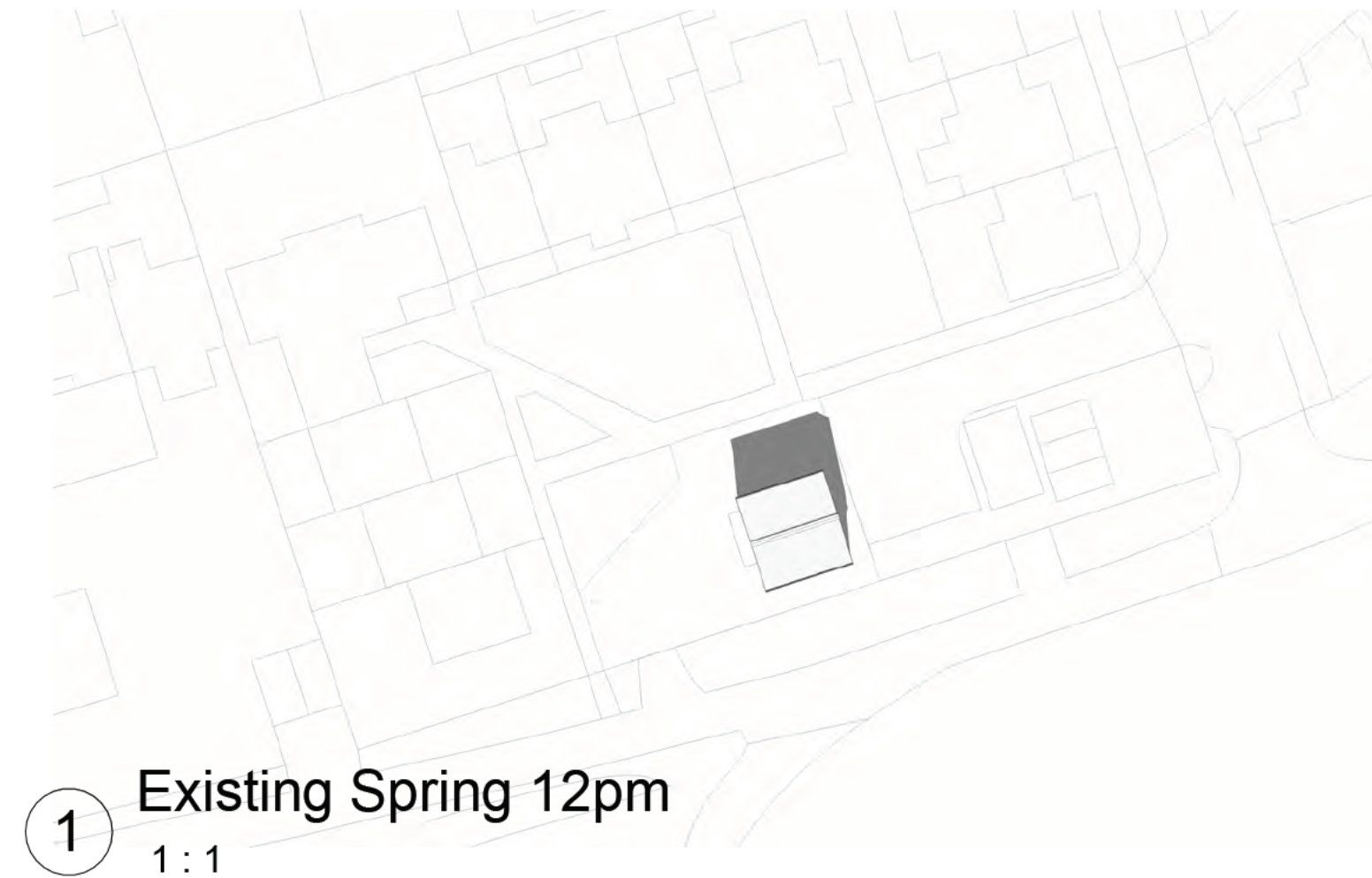
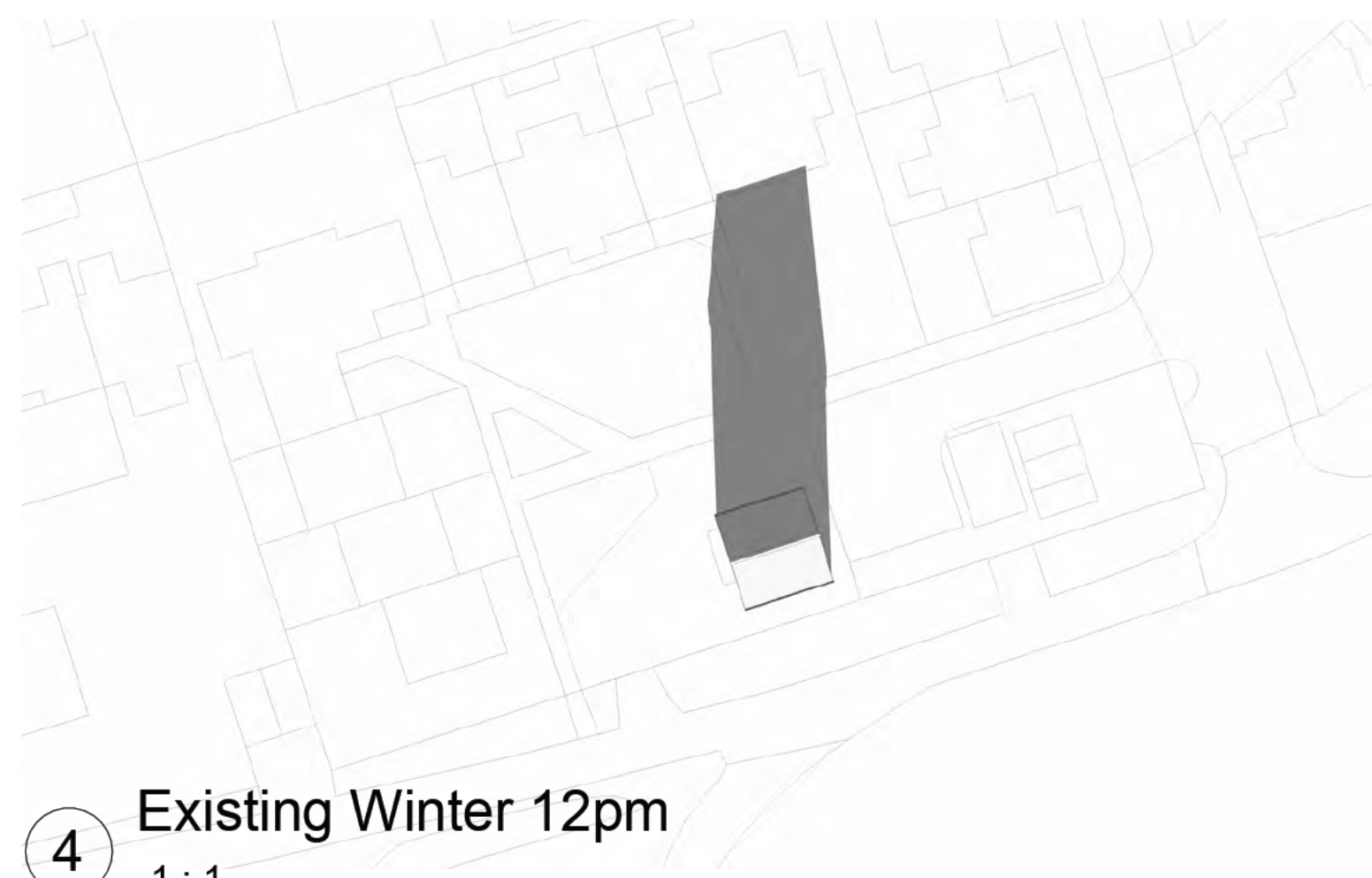
4.2 Proposed access provision:


The cycle path at the South of the site is part of the Route 1 cycle network that is frequently used by both cyclists and pedestrians, many of which walking dogs. It therefore seemed logical to move the main direct access to the East side via the existing parking area. The garage has been positioned to allow ease of access, with space for a further two cars off to the side. This avoids the risk of potential incidents due to visibility of coming out the driveway at the South. Positioning the parking provision at the North side also frees up valuable garden space towards the South. The existing opening to the driveway on the South will be gated to allow privacy to the site. The main access door would then move to the North elevation from the West, via a sheltered accessible ramped entrance. The proposal retains the compact hallway to minimise the amount of circulation space internally. This makes the internal layout more compact and improves the efficiency of the layout.

Disabled access is given to the house via a Building Regs compliant ramp to the new front door.




Garry Adam Architect
2A Orange Lane,
Montrose DD12 8ND
Garryadamarchitect.co.uk



Planning		
Project Carnoustie Coastguard Station		
Title Overshadowing Analysis		
Job No. 257	Rev. -	Drawing No. PD03
Scale N/A	Paper A1	Date July 2021
		
2A Orange Lane, Montrose, DD10 8ND 01674 675 610 garry@garryadamarchitect.co.uk www.garryadamarchitect.co.uk		



Planning		
Project Carnoustie Coastguard Station		
Title Proposed 3D Visuals		
Job No. 257	Rev. -	Drawing No. PD02
Scale N/A	Paper A1	Date July 2021
		
2A Orange Lane, Montrose, DD10 8ND 01674 675 610 garry@garryadamarchitect.co.uk www.garryadamarchitect.co.uk		

DEVELOPMENT MANAGEMENT REVIEW COMMITTEE

**APPLICATION FOR REVIEW – COASTGUARD STATION, 35 ADMIRAL
STREET, CARNOUSTIE**

APPLICATION NO 21/00590/FULL

APPLICANT'S SUBMISSION

Page No

ITEM 1	Notice of Review	
ITEM 2	Statement of Reasons	
ITEM 3	Drawings - Plans, Elevations & Sections for 10 Seabrae, Carnoustie	
ITEM 4	Drawings – Views & Street View for 10 Seabrae, Carnoustie	
ITEM 5	Report of Handling for 10 Seabrae, Carnoustie	
ITEM 6	Drawings - Proposed Elevations for 4A Long Row, Carnoustie	
ITEM 7	Drawings - 3D view for 4A Long Row, Carnoustie	
ITEM 8	Report of Handling for 4A Long Row, Carnoustie	



Angus House Orchardbank Business Park Forfar DD8 1AN Tel: 01307 473360 Fax: 01307 461 895 Email: plnprocessing@angus.gov.uk

Applications cannot be validated until all the necessary documentation has been submitted and the required fee has been paid.

Thank you for completing this application form:

ONLINE REFERENCE 100525674-001

The online reference is the unique reference for your online form only. The Planning Authority will allocate an Application Number when your form is validated. Please quote this reference if you need to contact the planning Authority about this application.

Applicant or Agent Details

Are you an applicant or an agent? * (An agent is an architect, consultant or someone else acting on behalf of the applicant in connection with this application)

Applicant Agent

Agent Details

Please enter Agent details

Company/Organisation:	Arthur Stone Planning & Architectural Design Limited		
Ref. Number:	<input type="text"/>	You must enter a Building Name or Number, or both: *	
First Name: *	Alison	Building Name:	<input type="text"/>
Last Name: *	Arthur	Building Number:	85
Telephone Number: *	01337 840 088	Address 1 (Street): *	High Street
Extension Number:	<input type="text"/>	Address 2:	<input type="text"/>
Mobile Number:	<input type="text"/>	Town/City: *	Newburgh
Fax Number:	<input type="text"/>	Country: *	United Kingdom
		Postcode: *	KY14 6DA
Email Address: *	info@arthurstoneplanning.co.uk		

Is the applicant an individual or an organisation/corporate entity? *

Individual Organisation/Corporate entity

Applicant Details

Please enter Applicant details

Title:	<input type="text" value="Miss"/>	You must enter a Building Name or Number, or both: *	
Other Title:	<input type="text"/>	Building Name:	<input type="text" value="Coastguard Station"/>
First Name: *	<input type="text" value="Susan"/>	Building Number:	<input type="text" value="35"/>
Last Name: *	<input type="text" value="Alexander"/>	Address 1 (Street): *	<input type="text" value="Admiral Street"/>
Company/Organisation	<input type="text"/>	Address 2:	<input type="text"/>
Telephone Number: *	<input type="text"/>	Town/City: *	<input type="text" value="Carnoustie"/>
Extension Number:	<input type="text"/>	Country: *	<input type="text" value="Scotland"/>
Mobile Number:	<input type="text"/>	Postcode: *	<input type="text" value="DD7 6BA"/>
Fax Number:	<input type="text"/>		
Email Address: *	<input type="text" value="info@arthurstoneplanning.co.uk"/>		

Site Address Details

Planning Authority:	<input type="text" value="Angus Council"/>
Full postal address of the site (including postcode where available):	
Address 1:	<input type="text" value="COASTGUARD STATION"/>
Address 2:	<input type="text" value="35 ADMIRAL STREET"/>
Address 3:	<input type="text"/>
Address 4:	<input type="text"/>
Address 5:	<input type="text"/>
Town/City/Settlement:	<input type="text" value="CARNOUSTIE"/>
Post Code:	<input type="text" value="DD7 6BA"/>

Please identify/describe the location of the site or sites

Northing	<input type="text" value="734565"/>	Easting	<input type="text" value="357078"/>
----------	-------------------------------------	---------	-------------------------------------

Description of Proposal

Please provide a description of your proposal to which your review relates. The description should be the same as given in the application form, or as amended with the agreement of the planning authority: *
(Max 500 characters)

Change of use and extension of the former HM Coastguard Service building to a domestic dwellinghouse.

Type of Application

What type of application did you submit to the planning authority? *

- Application for planning permission (including householder application but excluding application to work minerals).
- Application for planning permission in principle.
- Further application.
- Application for approval of matters specified in conditions.

What does your review relate to? *

- Refusal Notice.
- Grant of permission with Conditions imposed.
- No decision reached within the prescribed period (two months after validation date or any agreed extension) – deemed refusal.

Statement of reasons for seeking review

You must state in full, why you are seeking a review of the planning authority's decision (or failure to make a decision). Your statement must set out all matters you consider require to be taken into account in determining your review. If necessary this can be provided as a separate document in the 'Supporting Documents' section: * (Max 500 characters)

Note: you are unlikely to have a further opportunity to add to your statement of appeal at a later date, so it is essential that you produce all of the information you want the decision-maker to take into account.

You should not however raise any new matter which was not before the planning authority at the time it decided your application (or at the time expiry of the period of determination), unless you can demonstrate that the new matter could not have been raised before that time or that it not being raised before that time is a consequence of exceptional circumstances.

Please refer to submitted Statement of Reasons for Seeking Review

Have you raised any matters which were not before the appointed officer at the time the Determination on your application was made? *

Yes No

If yes, you should explain in the box below, why you are raising the new matter, why it was not raised with the appointed officer before your application was determined and why you consider it should be considered in your review: * (Max 500 characters)

Please provide a list of all supporting documents, materials and evidence which you wish to submit with your notice of review and intend to rely on in support of your review. You can attach these documents electronically later in the process: * (Max 500 characters)

Document 1: Approved Drawing_Proposed Plans, Elevations & Sections re 18_00869_FULL; Document 2: Approved _Views and Street View re 18_00869_FULL; Document 3: Report of Handling for application 18_00869_FULL at 10 Seabrae; Document 4: Approved Proposed Elevations re 20_00053_FULL; Document 5: Approved 3D View re 20_00053_FULL 20/00053/FULL; Document 6: Report of Handling for application 20_00053_FULL at 4A_Long_Row

Application Details

Please provide the application reference no. given to you by your planning authority for your previous application.

21/00590/FULL

What date was the application submitted to the planning authority? *

28/07/2021

Review Procedure

The Local Review Body will decide on the procedure to be used to determine your review and may at any time during the review process require that further information or representations be made to enable them to determine the review. Further information may be required by one or a combination of procedures, such as: written submissions; the holding of one or more hearing sessions and/or inspecting the land which is the subject of the review case.

Can this review continue to a conclusion, in your opinion, based on a review of the relevant information provided by yourself and other parties only, without any further procedures? For example, written submission, hearing session, site inspection. *

Yes No

Please indicate what procedure (or combination of procedures) you think is most appropriate for the handling of your review. You may select more than one option if you wish the review to be a combination of procedures.

Please select a further procedure *

By means of inspection of the land to which the review relates

Please explain in detail in your own words why this further procedure is required and the matters set out in your statement of appeal it will deal with? (Max 500 characters)

A site visit will enable a fuller understanding and appreciation of the site and its surroundings.

In the event that the Local Review Body appointed to consider your application decides to inspect the site, in your opinion:

Can the site be clearly seen from a road or public land? *

Yes No

Is it possible for the site to be accessed safely and without barriers to entry? *

Yes No

Checklist – Application for Notice of Review

Please complete the following checklist to make sure you have provided all the necessary information in support of your appeal. Failure to submit all this information may result in your appeal being deemed invalid.

Have you provided the name and address of the applicant?. *

Yes No

Have you provided the date and reference number of the application which is the subject of this review? *

Yes No

If you are the agent, acting on behalf of the applicant, have you provided details of your name and address and indicated whether any notice or correspondence required in connection with the review should be sent to you or the applicant? *

Yes No N/A

Have you provided a statement setting out your reasons for requiring a review and by what procedure (or combination of procedures) you wish the review to be conducted? *

Yes No

Note: You must state, in full, why you are seeking a review on your application. Your statement must set out all matters you consider require to be taken into account in determining your review. You may not have a further opportunity to add to your statement of review at a later date. It is therefore essential that you submit with your notice of review, all necessary information and evidence that you rely on and wish the Local Review Body to consider as part of your review.

Please attach a copy of all documents, material and evidence which you intend to rely on (e.g. plans and Drawings) which are now the subject of this review *

Yes No

Note: Where the review relates to a further application e.g. renewal of planning permission or modification, variation or removal of a planning condition or where it relates to an application for approval of matters specified in conditions, it is advisable to provide the application reference number, approved plans and decision notice (if any) from the earlier consent.

Declare – Notice of Review

I/We the applicant/agent certify that this is an application for review on the grounds stated.

Declaration Name: Mrs Alison Arthur

Declaration Date: 29/01/2022



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Statement of Reasons for Seeking Review

In respect of non-determination of application 21/00590/FULL
by Angus Council

Change of use and extension of the former HM Coastguard Service
building to a domestic dwellinghouse

Coastguard Station, 35 Admiral Street, Carnoustie, DD7 6BA



On behalf of Miss Susan Alexander

January 2022

1.0 Background

1.1 This statement has been prepared for Miss Susan Alexander (the applicant) and is submitted in support of her request for review in terms of the non-determination by Angus Council (the Council) of planning application 21/00590/FULL.

1.2 The applicant submitted an application to Angus Council, validated 18 August 2021. The agreed description for the application is:

‘Change of use and extension of the former HM Coastguard Service building to a domestic dwellinghouse’.

1.3 The applicant agreed a time extension for a decision on the application, until 22 November 2021. A decision has not yet been made on the application and the applicant has now decided to seek review of the application in respect of its non-determination.

1.4 The plans and documents submitted as part of the application have not been submitted again with this request for review as they are contained within the Council’s own application file.

1.5 With respect, the applicant seeks the support of the Development Management Review Committee in gaining consent for the re-use of the former Coastguard Station, to provide high quality residential accommodation within Carnoustie.

2.0 Site Context and Description

2.1 The proposal relates to the former Coastguard Station located adjacent to Admiral Street, Carnoustie and fronting the coastline. The property has been redundant for some time, was marketed in mid 2021 and purchased by the applicant who is proposing its extension and change of use to create a family home.

2.2 Directly adjacent to the east of the site is an area available for car parking and is the site for two further sheds. The coastline and associated open space lies directly to the south of the site, with the Cycle Path adjacent. The surrounding area to the north, west and east is residential and comprises a mix of properties of varying ages, both single and two storey.

2.3 The site is approximately 330m² in area and contains the single storey Coastguard Station building, of modern construction with dry dash wall finish and tiled roof. The remainder of the site is hard surfaced with block paving. Timber fencing surrounds the site to the north, west and east and to the south the boundary is formed from a low stone wall. The site can be accessed from the east, from the end of Admiral Street or from the south, from the track running along the coastline. The access from the end of Admiral Street is on non-adopted roads.

2.4 The architect’s submitted Design and Access Statement (Appendix 1) contains additional detail and illustration of the site and its surroundings.

Former Coastguard Station viewed from Core Path/National Cycle Route



View from South West



View from South

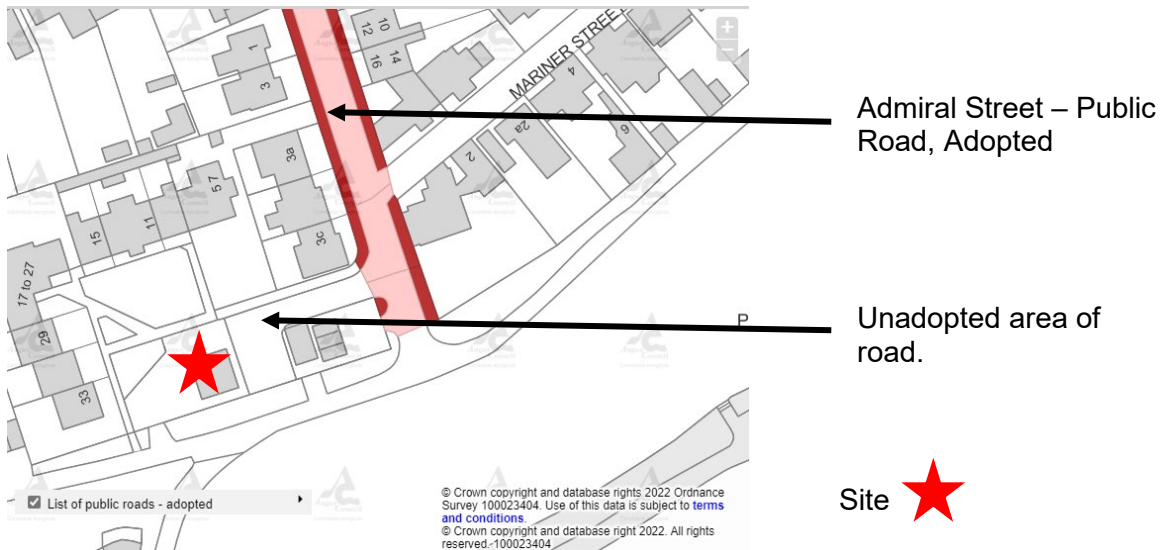


View from East

Access to site on Admiral Street



Extract from Angus Council mapping of Public Roads indicating area of Admiral Street as unadopted road.



Aerial view indicating location of site



3.0 The Proposal

3.1 In summary, the proposal is to alter the existing accommodation to form a two-bedroom house by adding an upper floor into the building and forming an extension to the west. A smaller extension to the north is proposed as a garage. The proposal has characteristics of buildings in the surrounding area – with a traditional form and pitched roof. The orientation towards the coast is common to many properties in the area and allows for maximum solar gain, sea views and for an active frontage to the Core Path/National Cycle Route and coastal public open space. (We note there are labelling errors relating to correct N/S/E/W elevations on the originally submitted Elevation drawing PD01).

3.2 The proposed materials are high quality and appropriate to the area. The existing dry dash render finish is retained along with the use of fibre cement cladding on the proposed western extension. The proposed garage extension will be rendered to match the existing. Roofing tiles will be used to match the current material. The existing property boundary fencing and wall will be retained. The property has an existing connection to the public water supply, drainage network and electricity supply.

3.3 Protecting residential amenity for neighbouring properties, and the future occupants, has been a major consideration and important part of the design process, in line with meeting the Council's detailed requirements. Focussing the main areas of glazing on the south elevation and including very limited glazing on the north (no glazing), west or east elevations protects the amenity of the surrounding residential area. The proposal was analysed to assess any overshadowing of surrounding properties and the roof pitch and height has been kept to a level which protects the surrounding area.

3.4 The existing building has no particular architectural merit. The design process has taken care to ensure that the proposal is an appropriate and high-quality addition to the character of the surrounding area and will bring significant enhancement to Carnoustie's coastal edge.

3.5 We refer the members of the Development Management Review Committee to the architect's submitted Design Statement for further detail of the design concept and solution, and photographs of the site and surroundings.

4.0 Additional Information Submitted

4.1 The applicant has submitted a letter from a qualified bat surveyor regarding the bat roosting potential of the site and existing building. This was assessed as having practically no potential and the surveyor's recommendation was that no survey was required.

5.0 Consultations Received on the Proposal

5.1 The Council's online application file indicates that responses have been received from Scottish Water and from Angus Council Roads.

5.2 Scottish Water has indicated that it has no objection to the application. It noted that there is currently sufficient capacity for water supply and waste water treatment.

5.3 Angus Council Roads has indicated no objection to the application. The response includes that 'I have considered the application in terms of the traffic likely to be generated by it, and its impact on the public road network. As a result, I do not object to the application. The consultation response highlights that the marked disabled bay, adjacent to the site, will not be affected by the proposed access. It also acknowledges that the proposed parking, to the north of the application site will reduce any potential risk to pedestrians/cyclists from use of the shared use cycle track to the south of the property. The response notes that the area of Admiral Street adjacent to the site is not on the List of Public Roads and therefore road authority consent is not required for a vehicle access.'

6.0 Representations

6.1 We note that 14 representations have been submitted (from 12 representees) and we have referred to the points made in these in the following statement.

7.0 Assessment and Grounds for Seeking Approval

7.1 Section 25 (1) of the Town and Country Planning (Scotland) Act 1997 includes that 'Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination is, unless material considerations indicate otherwise – (a) to be made in accordance with that plan...'

7.2 The relevant Development Plan is the TAYplan Strategic Development Plan 2017 and the Angus Local Development Plan 2016 (ALDP). We do not believe that the proposal has strategic implications, and no further reference has been made to the Strategic Development Plan. The LDP provides the main basis for determining planning applications along with reference to guidance, including Angus Council's Design Quality and Placemaking Supplementary Guidance 2018.

7.3 We believe that the policies relevant to the consideration of this application are:

Policy DS1: Development Boundaries and Priorities

Policy DS3: Design Quality and Placemaking

Policy DS4: Amenity

Policy TC2: Residential Development

Policy PV3: Access and Informal Recreation

Policy PV5: Protected Species

Policy PV15: Drainage Infrastructure

8.0 Policy Considerations - Principle of Development

8.1 The application site lies within the Carnoustie development boundary, as shown on the Angus Local Development Plan 2016 (ALDP). The site is not shown as part of any allocation or protected for any other use.

8.2 Policy DS1: Development Boundaries and Priorities states that:
'Proposals on sites not allocated or otherwise identified for development, but within development boundaries will be supported where they are of an appropriate scale and nature and are in accordance with relevant policies of the ALDP'. The policy also includes that:

'In all locations, proposals that re-use or make better use of vacant, derelict or under-used brownfield land or buildings will be supported when they are in accordance with relevant policies of the ALDP.'

8.3 We contend that the proposal gains support in principle from Policy DC1, being within the Carnoustie development boundary, and additionally, re-using a brownfield site and vacant building. We believe that the detailed policy requirements are also met, as set out below.

8.4 Policy TC2: Residential Development re-iterates that support given in Policy DC1 for development, in the case residential development, within development boundaries. The policy also requires all proposals for new residential development to be compliant with several criteria. The policy addresses the conversion of non-residential buildings and seeks that a proposal will comply with several criteria. Relevant to this proposal are that the proposal must be compatible with current and proposed land uses in the surrounding area; provide a satisfactory residential environment for the proposed dwelling; and not result in unacceptable impact on the built and natural environment, surrounding amenity, access and infrastructure.

8.5 The application site is located within a residential area and the proposal for a dwellinghouse would be entirely compatible with the surrounding area. The details of the proposal (considered below) illustrate that the proposal can achieve an appropriate residential environment, as set out in the Council's detailed guidance. We also contend that the proposal is acceptable in terms of any impacts on the surrounding built and natural environment, has not significant impacts on surrounding amenity, access or infrastructure. In this respect we contend that the proposal should be considered to gain support from Policy TC2: Residential Development.

9.0 Policy Considerations – Detailed Requirements

9.1 Policy DS3: Design Quality and Placemaking states that development proposals should deliver a high design standard and the policy aims to ensure that development reflects the Scottish Government's 'six qualities of a successful place.' The policy is supported by the details contained in the Design Quality and Placemaking Supplementary Guidance 2018. Policy TC2: Residential Development requires all proposals for new residential development to have an acceptable impact on the built environment.

Design

9.2 A Design and Access Statement was submitted with the application to explain the design process and the design solution reached, acknowledging the characteristics of the site and the surrounding site. We believe that the proposal achieves the high design standards required by the guidance and can be supported by Policy DS3, as set out below. We refer the Development Management Review Committee to the Design and Access Statement for further detail of the design concept and solution.

9.3 We acknowledge that the case officer, in providing his assessment of the proposal to the architect, had noted some concern with the proposal, in terms of the site being relatively small and that the proposal for a larger building would not be consistent with the character and pattern of development in the surrounding area. The case officer referred to buildings closest to the Core Path being 'small and single storey in appearance.' We highlight that the surrounding area has a mix of single and two storey buildings of a variety of size and scale - including detached, semi-detached and terraced (illustrated by the photographs included in this Statement and in the Design and Access Statement).

9.4 The architect was disappointed by this assessment and responded to the case officer with his own comments. He highlighted the positive assessment and approval of a similar and neighbouring proposal at 10 Seabrae (application 18/00869/FULL), 50m to the south west of the application site (3D view from Council's application file included below). The Drawings and 3D views for that application, along with the Council's Report of Handling, are submitted for the Development Management Review Committee's information. (Documents 1, 2 and 3).

9.5 We include an extract from the correspondence between the architect and case officer which refers to the content of the Report of Handling for the neighbouring property.

*Extract from correspondence between client's architect and Council case officer (quotes from Report of Handling in **bold**)*

To understand our confusion, perhaps it would be helpful to refer to the neighbouring planning decision. Feedback provided in their approval of 10 Seabrae application no 18/00869/FULL. No. 10 Seabrae is separated by only one residential dwelling along the coast from our application site. Both have a south boundary on the foreshore and are similarly sitting around 45 metres back from the beach head. I have outlined a couple of areas where Planning comment on the Seabrae application which appears to be in contradiction to feedback on our application:

“The existing house sits on a frontage site and there is therefore no imperative reason why development should be restricted to single storey notwithstanding assertions made in letters of representation. The properties located closest to the foreshore in Carnoustie are varied in size and type and as previously mentioned, increasingly have been significantly altered to reorient them to a south facing outlook unless they have originally been designed in that manner in the first instance. In terms of impacts on the character and appearance of the existing dwelling, the extension would be transformational however there is no significant merit in the original dwelling and its substantive alteration would therefore positively impact on the wider area.”

The property at 10 Seabrae was previously a single storey 2 bed bungalow, the property was 70sqm and was approved to be increased to 178sqm in size, over at least two storeys, with 145sqm of amenity space on a site of 400 sqm. The planner commented on the Seabrae application:

“The proposal would undoubtedly result in a radical change in the style of the property. It does not however naturally follow that radical change is equal to negative change and on that basis the proposal needs to be considered on its own merits in terms of the policy context referred to above and in terms of the Council's published guidance on householder development.”

“The level of development is consistent with modern plot ratios for new build houses within development boundaries and would not be at odds with the varied nature of plot ratios both on Seabrae and in the wider area.”

The Coastguard station is very similar to the original building and plot at Seabrae, in that it is a single storey dwelling, around 50sqm existing, and our proposal is to increase to around 120sqm. Our proposal provides for 155 sqm of amenity space and is sat within a site of 330sqm.

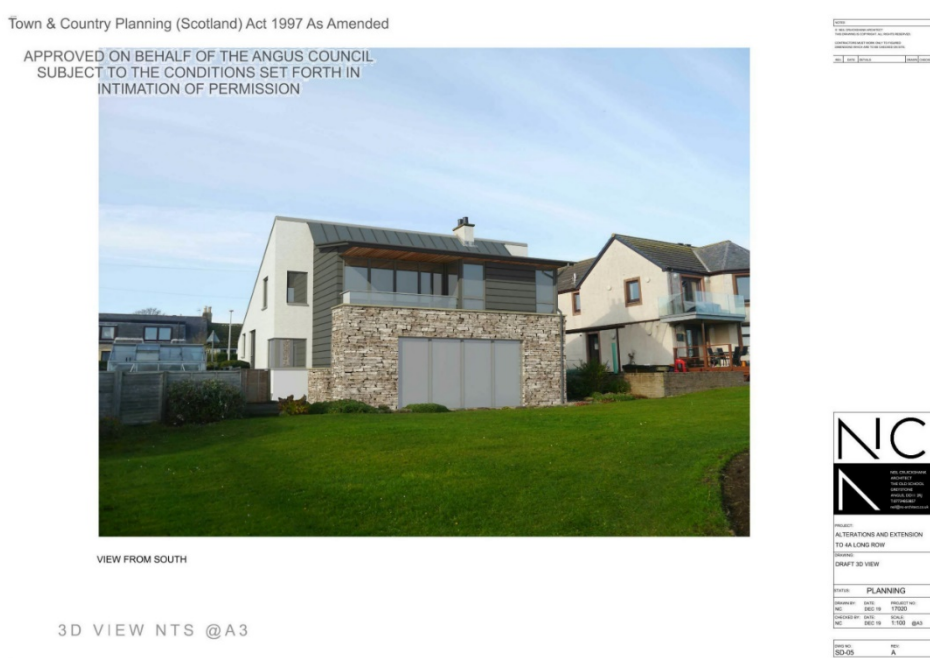


Property at 10 Seabrae,
subject of application 18/00869/FULL

9.5 We also wish to highlight another recent approval, now built, for a significantly enlarged building at 4A Long Row, on the coastal edge approx. 200m to the north east of the application site. (3D view from Council's application file included below). That consent has created a two storey house (application 20/00053/FULL). The Report of Handling for the application includes that the proposal 'does not have a significant adverse impact on the character and appearance of the dwelling or wider area.' The wider area contains a mix of dwellings, of varied size and scale, including along the coastal edge. The Elevation Drawings, 3D Views and Report of Handling for that application are also submitted for the Committee's information (Documents 4, 5 and 6).



3D views of proposal 18/18/00869/FULL 10 Seabrae - from Council's online file



3D view of proposal 20/00053/FULL 4A Long Row - from Council's online file



9.6 We acknowledge that every application is determined on its own merits. However, we strongly contend that these two examples, above, demonstrate that a large well designed extension of a building, resulting in significant change on the coastal edge, can be appropriate in terms of the character and appearance of the area.

9.7 In the following paragraphs we refer to this proposal in terms of its compliance with the detailed policy requirements of the Council’s policies and guidance.

Plot Coverage and Garden Ground

9.8 The Council’s Planning Advice Note 14 Small Housing Sites indicates that, in general terms, a proposed house should not cover more than 30% of the plot, to enable sufficient open space around the house for outdoor activity. This proposal, with a plot size of 330sqm, cover 27% of the plot, in line with the requirements. The Design and Access Statement refers to the arrangement of the site, locating the proposed parking to the north side of the dwellinghouse with the main garden space located to the south, for privacy and to gain the views of landscape and sea.

9.9 Angus Council’s Supplementary guidance includes that residential proposals should provide sufficient private amenity space to meet the likely needs of the occupants. The amenity space provided is stated as 155m². The guidance refers to plot sizes reflecting those of the surrounding areas, but generally that a minimum area of 100sqm per house is required. An indication is that the private amenity space should be no smaller than the floor area of the house. The floor area of the proposed dwellinghouse, including the garage, is

134m² and therefore the proposal for amenity space meets with the requirements of the Supplementary Guidance.

9.10 We acknowledge that the Planning Advice Note 14 does refer to a suggested minimum plot area for a dwellinghouse of 400 sqm. However, this is stated as 'a general guide only' and a lower minimum is indicated as potentially acceptable depending on impacts on neighbours. This proposal achieves re-use of an existing brownfield site and vacant building and is shown to meet with the detailed requirements of residential amenity. There is an opportunity for this proposal to be acceptable on this slightly reduced plot area to achieve the benefit of re-use of the site for a dwellinghouse, consistent with the Council's objectives and Policy DS1: Development Boundaries and Priorities.

Privacy/Overlooking

9.11 The Design and Access Statement emphasises that the design approach has been to avoid any potential overlooking issues. Maintaining the amenity of the neighbouring area has been given detailed consideration and the design has been prepared, following technical assessment, to ensure that there is no impact on the neighbouring dwellinghouses.

9.12 The proposed dwellinghouse will have the main elements of its glazing on the south facing elevation towards the sea – large bi-fold doors opening on to the patio from the living space, high level ground floor windows for study and bedroom and first floor window lighting the living room. The north elevation, facing the dwellinghouses on Admiral Street, will have no openings, other than a single unglazed entrance door. The east elevation, facing the car parking area and existing sheds adjacent to the site contains the garage door opening, and a single window at ground floor – from a shower room (obscured glazing) and two small windows at first floor level, from a bedroom and living room. The west elevation has a small window at ground floor level and skylights on the roof plane which will light the full height kitchen and dining space and stairwell below, with no overlooking possible. Overall, it is considered that the proposal dwellinghouse will cause no issues of loss of privacy to neighbouring properties. In addition, the future occupants of the property will achieve appropriate privacy, both within the proposed dwellinghouse and in the location of its available private amenity space.

9.13 We note that submitted Representations have referred to privacy concerns, specifically on the west elevation. However, we believe that there will be no loss of privacy to surrounding properties. There are minimal openings in the upper floor of the property and, taking account of the nature of the surrounding area, there are two storey properties creating existing overlooking within the adjacent area.

9.14 The Design Quality and Placemaking Supplementary Guidance (2018) includes that it will be expected that new buildings do not overlook private areas of neighbouring properties and that developments should meet with the privacy standards set out in the Council's Planning Advice Notes and avoid clear views into neighbouring living rooms and bedrooms. This proposal complies with the detailed guidelines contained in Planning Advice Note 14: Small Housing Sites in terms of distance between windows. Overlooking and loss of privacy was not raised as an issue by the case officer in his discussion with the architect throughout the assessment of the application.

Overshadowing

9.15 An Overshadowing Analysis has been submitted by the architect showing the differing shadows created by the existing and proposed situation, to assess the impact of the proposal on neighbouring properties. (Drawing No. PD03) This illustrates that there is minimal additional overshadowing created by the proposal and that this is mainly contained within the closest area around the property – its own ground and the neighbouring open space. The submitted Design and Access Statement (Appendix 1) explains in its Design Rationale, para 3.2, that the proposed roof pitch has been kept low to minimise overshadowing on neighbouring properties. We note that Representations have made reference to issues of overshadowing. The analysis indicates that this should not be a significant issue for neighbouring properties. The case officer provided feedback to the architect, stating that he had ‘fully assessed’ the proposal. He did not raise any concern that the proposal caused any unacceptable level of overshadowing. With this support we believe that the proposal can be considered compliant with Policy DS3: Design Quality and Placemaking and the related Supplementary Guidance.

Traffic and Road Safety

9.16 Policy DS3 Design Quality and Placemaking refers to the design standards required by new development, including in terms of being ‘Well Connected’ and that the access and parking requirements of the Roads Authority are met. The proposal includes taking access to the site from the area of Admiral Street to its east which serves as parking space. Parking space and a garage are proposed within the site. The access formerly used, taken from the Core Path to the south, would not be used, protecting the safety of users of the Core Path. The consultation response from the Council’s Roads team states that the area of the access is not on the List of Public Roads and therefore no consent from the Roads Authority is required for the creation of an access. In addition, forming the access onto an unadopted road is not subject to planning control. The case officer’s feedback to the architect raised concern regarding parking provision for the proposal contrary to the positive consultation response from the Council’s Roads. The architect again referred to the nearby approval at 10 Seabrae (18/00869/FULL) where the Report of Handling highlighted that the formation of an access onto an unadopted road is not subject to planning control and concurred with the Council’s Roads consultee who had raised no objection.

*Extract from correspondence between client’s architect and Council case officer (quotes from Report of Handling in **bold**)*

In relation to the planning feedback on a lack of turning and being reliant on land out with the site (which is unadopted) for turning. Angus Council Roads (Traffic) have raised no objection to our application. In the case of the Seabrae application, which was also using unadopted land out with their site to turn, the planner comments were:

“The formation of such an access onto an unadopted track is not subject of planning control and is considered to represent no more of a hazard to road safety or a burden in terms of its impact on the road surface than any of the other vehicular accesses on the street. The street is such that high vehicular speeds are unlikely to occur. The application has been reviewed by Angus Council Roads (Traffic) who raise no objection to the proposal in terms of parking standards or road and pedestrian safety.”



Current access to site from Core Path/National Cycle route to be closed.

9.17 The Council's Roads consultation response made no objection to the proposal in terms of the parking provided within the site. The response did note that the proposal would not affect the disabled parking bay, located to the south of the area, and that the proposed location for the access prevents user conflicts on the Core Path.

9.18 We note that Representations have referred to issues relating to parking and access but we are reassured by the response of the Council's Road Service that the proposal accords with the requirements of Policy DS3 in terms of access and parking requirements.

Access and Informal Recreation

9.19 Policy PV3: Access and Informal Recreation includes that new development should not compromise existing recreational access opportunities and that existing routes should be retained. The tarred path fronting the property and running along the coastal edge of the town is identified as a Core Path by the Council (route 166 Links Parade to Long Row). This route forms part of National Cycle Route 1. This path had, historically, been used as the access to the Coastguard Station. This proposal aims to protect the route from vehicular traffic by achieving access from the end of Admiral Street to the north of the site. This will ensure that there is no conflict between users of the Core Path and vehicular traffic. We believe that the proposal complies with the requirements of Policy PV3.

Natural Heritage

9.20 Policy PV5 Protected Species states that development proposals likely to affect protected species will be assessed to ensure compatibility with the appropriate regulatory regime. The presence of bats is a consideration in the renovation of buildings and therefore the applicant received advice from a qualified bat surveyor. A letter is submitted regarding the bat roosting potential of the site and existing building. This was assessed as having practically no potential and the surveyor's recommendation was that no survey was required. The need for any further survey work was not raised by the case officer in his detailed assessment of the proposal. We believe that the proposal is consistent with the requirements of Policy PV5.

Drainage

9.21 Policy PV15: Drainage Infrastructure requires that development proposals within Development Boundaries are required to connect to the public sewer where available. The policy notes that proposals for single dwellinghouses are not required to provide sustainable drainage to accommodate surface water. The property has existing connections to the water supply and drainage network and no objection has been made by Scottish Water in its consultation response. We contend that the proposal is fully compliant with the requirements of Policy PV15.

10.0 Conclusion

10.1 We contend that the proposal gains support from policies contained in the Angus Local Development Plan 2016 and the related Design Quality and Placemaking Supplementary Guidance 2018. We make the following points:

- The proposal can gain support in terms the principle of development – being the creation of a dwellinghouse within a Development Boundary, Carnoustie, through the re-use of a brownfield site and vacant building.
- The proposal, in terms of its scale, form and design can be accommodated within the surrounding area without detriment to its character and amenity. Although proposing a significant alteration to the existing building this can be acceptable in terms of the Council's detailed policies, as demonstrated by the approval of a nearby proposal, as referred to in this statement.
- The proposal meets with the requirements of the Council's detailed policies and overall we contend, gains support from the Angus Local Development Plan. We do not believe that there are any materials considerations that indicate otherwise.
- With respect, the applicant seeks the support of the Development Management Review Committee in gaining consent for the re-use of the former Coastguard Station, to provide high quality residential accommodation within Carnoustie.

Appendix 1

Design and Access Statement

(On following pages)



257 Coastguard Station Carnoustie Design & Access Statements

Application for conversion and proposed extension to the former HM Coastguard Station.



Contents

Design statement

1. Introduction
2. Site and area appraisal
 - 2.1 Site history
 - 2.2 Planning history
 - 2.3 Contextual photograph survey
3. Proposed works to Coastguard Station
 - 3.1 Proposed works
 - 3.2 Design Rationale
 - 3.3 Materials
 - 3.4 Energy

Access statement

4. Access statement
 - 4.1 Current access provision
 - 4.2 Proposed access provision

1. Introduction

This Design & Access Statement has been prepared in support of a full planning application for the former HM Coastguard Station in Carnoustie.

This documentation should be read in conjunction with the drawings submitted in the application as follows:

257 EX01 Existing Plan & Elevations 210719

257 LP01 Location Plan 210719

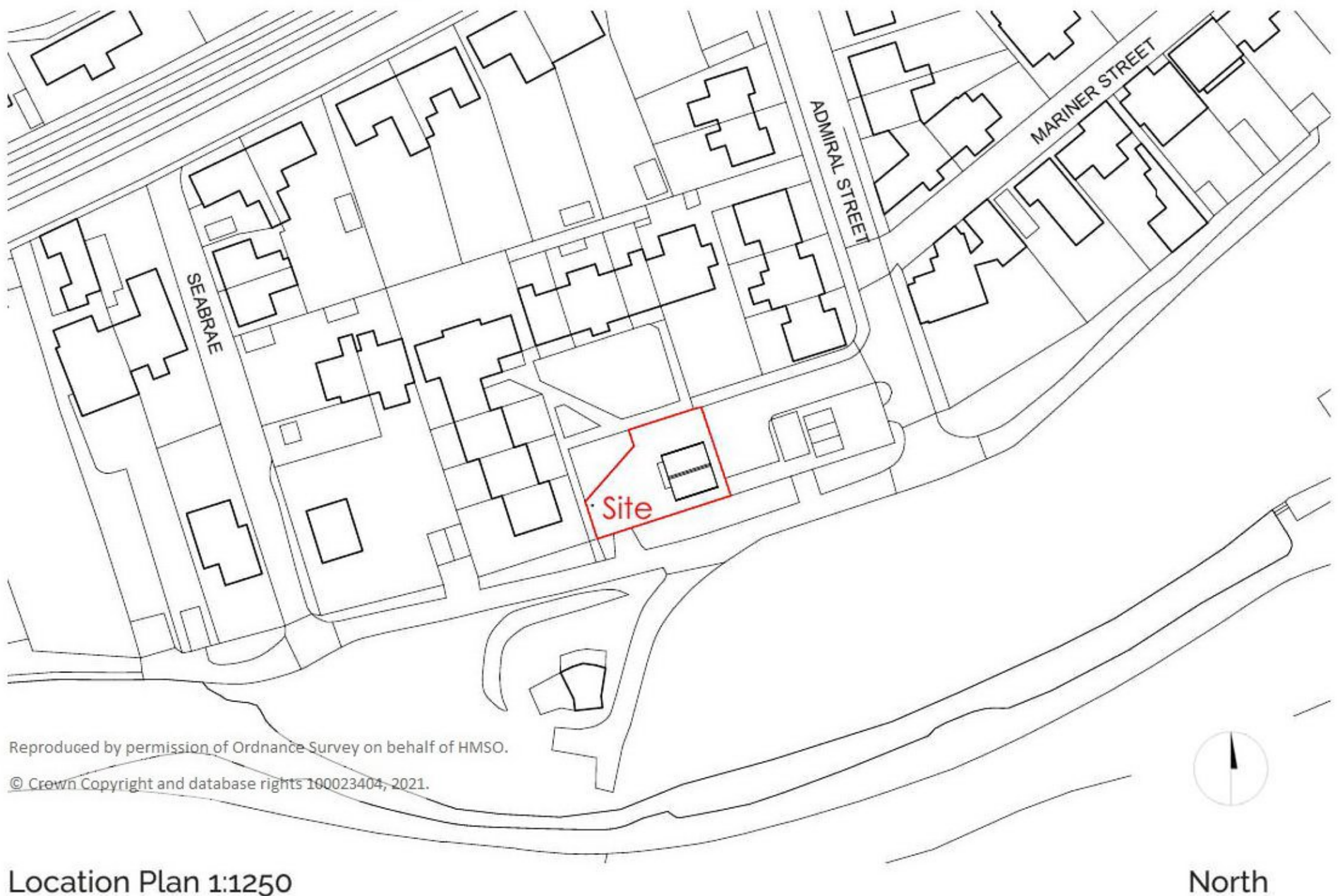
257 PD01 Rev A Proposed Plans, Elevations & Section 210719

257 PD02 Proposed 3D Visuals 210719

257 PD03 Overshadowing Analysis 210719

257 SP01 Rev A Proposed Site Plan 210719

2.0 Site and Area Appraisal



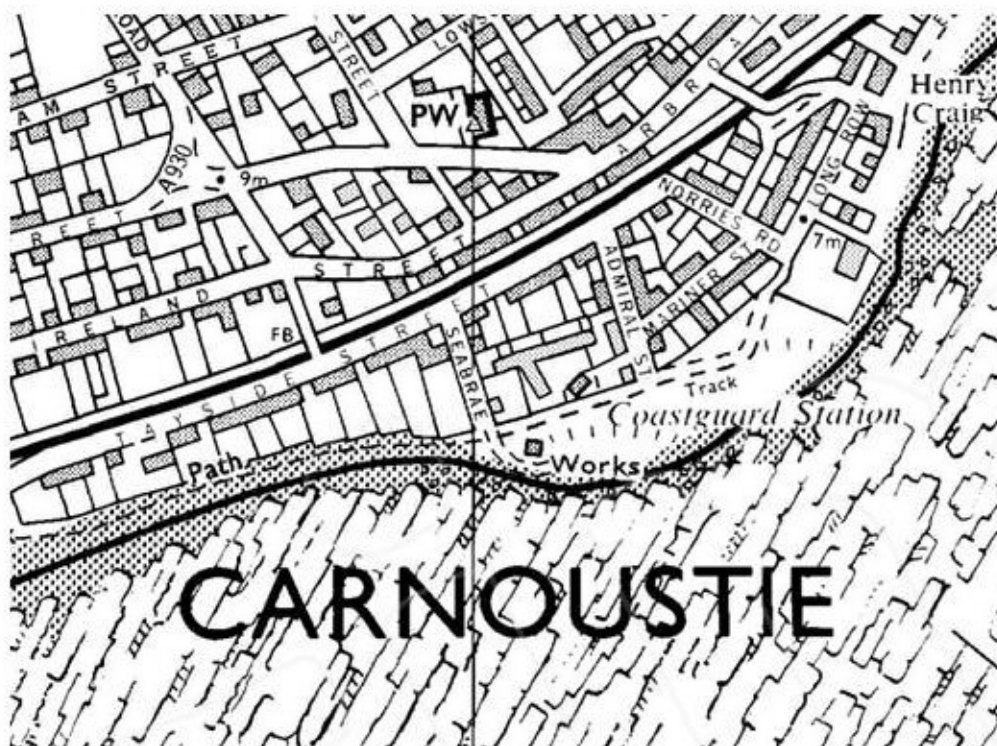
The Coastguard Station is located off Admiral street adjacent to the coastline and route 1 cycle path. It is currently disused and was formerly used by Her Majesty's Coastguard Rescue Service. The site area is 330m² and is currently serviced. The Coastguard Station has been vacant for numerous years. The site was recently purchased by our client with the intention of converting it to a family home.

The surrounding area is residential to the North and West of the Coastguard Station with small garages to the East. The neighbouring buildings vary in age and style with the single storey Bungalows to the West constructed in the 1990's and the two storey Victorian housing to the North dating back as early as 1900.

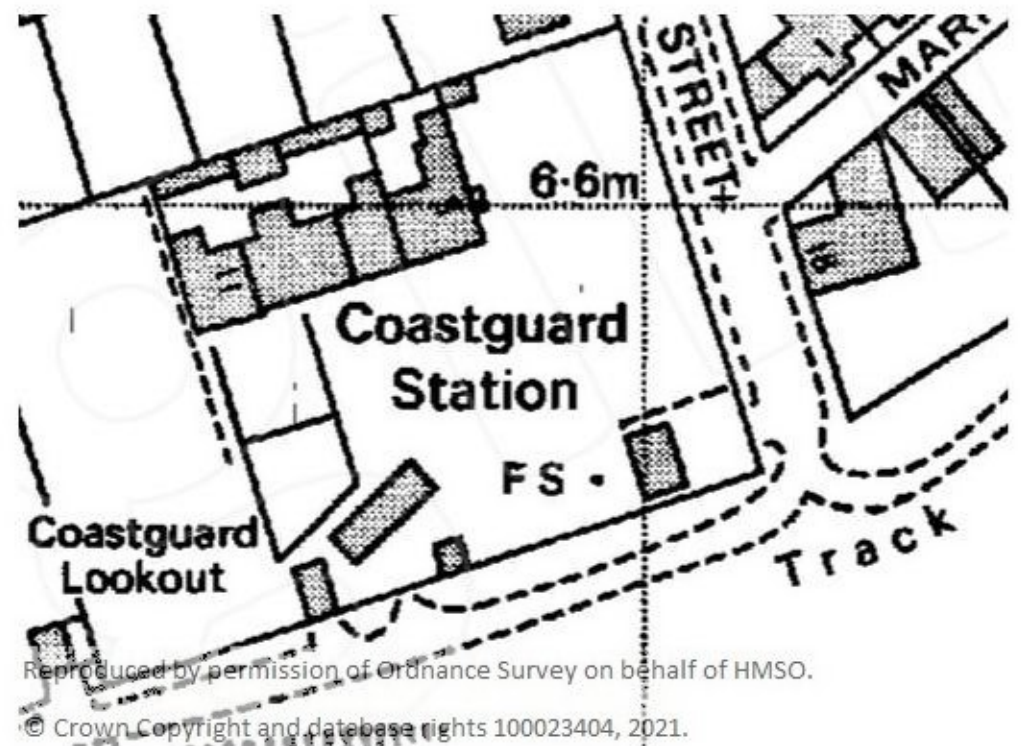
The site boundary is a timber fence roughly 1800mm high that surrounds the West and North perimeter of the site, with public parking to the East which currently hosts around four vehicles including a disabled parking space. The West side of the boundary is a low 1100mm high fence and at the South is a stone wall of similar height facing the coastline with an opening for vehicular access. At the South of the site is an existing route 1 cycle network path that is frequently used by cyclists and pedestrians.

Historical maps suggest the a Coastguard Station has been present on site since at least 1900, but was demolished and replaced with a new construction around 1999 which is the subject of this application.

2.1 Site History



1990 map extract from Digimap
Formation of housing to west of the site.



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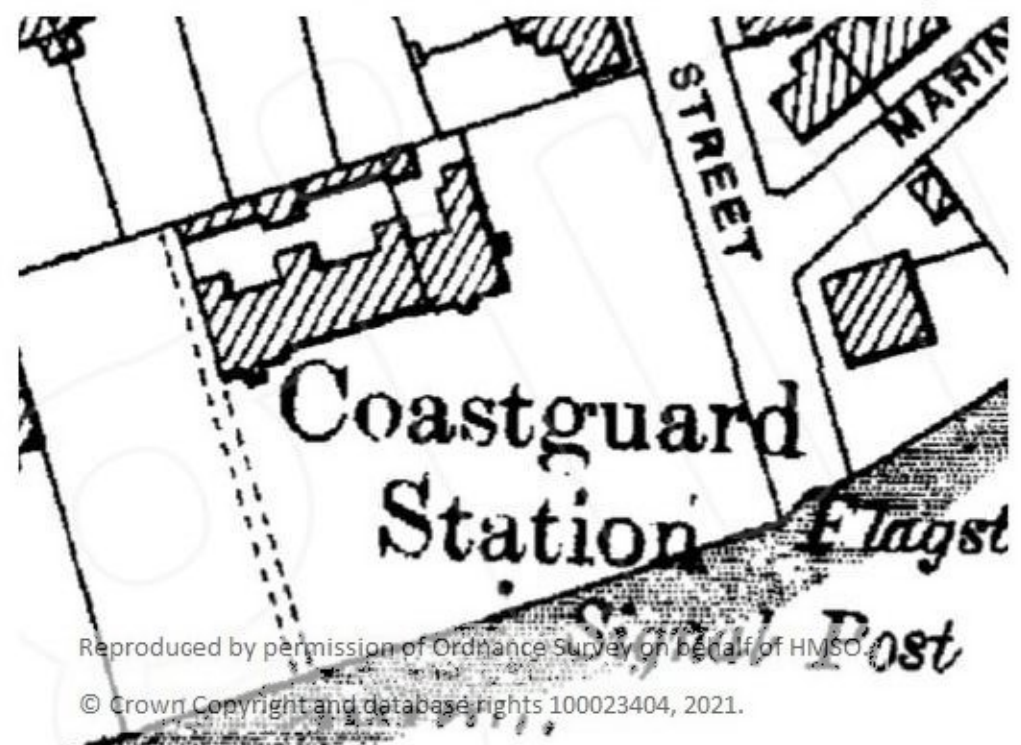
1980 map extract from Digimap
Minor development of out buildings to the east of the site. (Note: no changes appear to be made on site between 1920-1980 maps.)



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1920 map extract from Digimap
Minor changes to the map indicating the location of the former Coastguard Station.



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1900 map extract from Digimap

The historical maps accessed via Digimaps.edina.ac.uk suggests there was a former Coastguard Station that sit diagonally on site from as early as 1900. It appears to have been demolished and replaced by the current Coastguard Station within this application which sits parallel with the boundary line following the below planning application dated June 1999.

2.2 Planning History

- 99/00560/FUL | Erection of Rescue Boat House | Coast Guard Station Admiral Street Carnoustie Angus DD7 6BA Available at: <https://planning.angus.gov.uk/online-applications/applicationDetails.do?keyVal=9900560FUL&activeTab=summary> [Accessed 26th July 2021]

The only record of any planning application on site was in June 1999 for the erection of a rescue boat house which was approved in July 1999. There are no active or recent applications on site or for the closely neighbouring properties.

2.3 Contextual Photograph Survey



Coastguard Station in context from South



Coastguard Station & existing boundary



Access from Admiral street



Access from Admiral street



Existing parking provision



Housing to the North of site



Existing cycle route and out buildings at East of site



Housing to the West of site

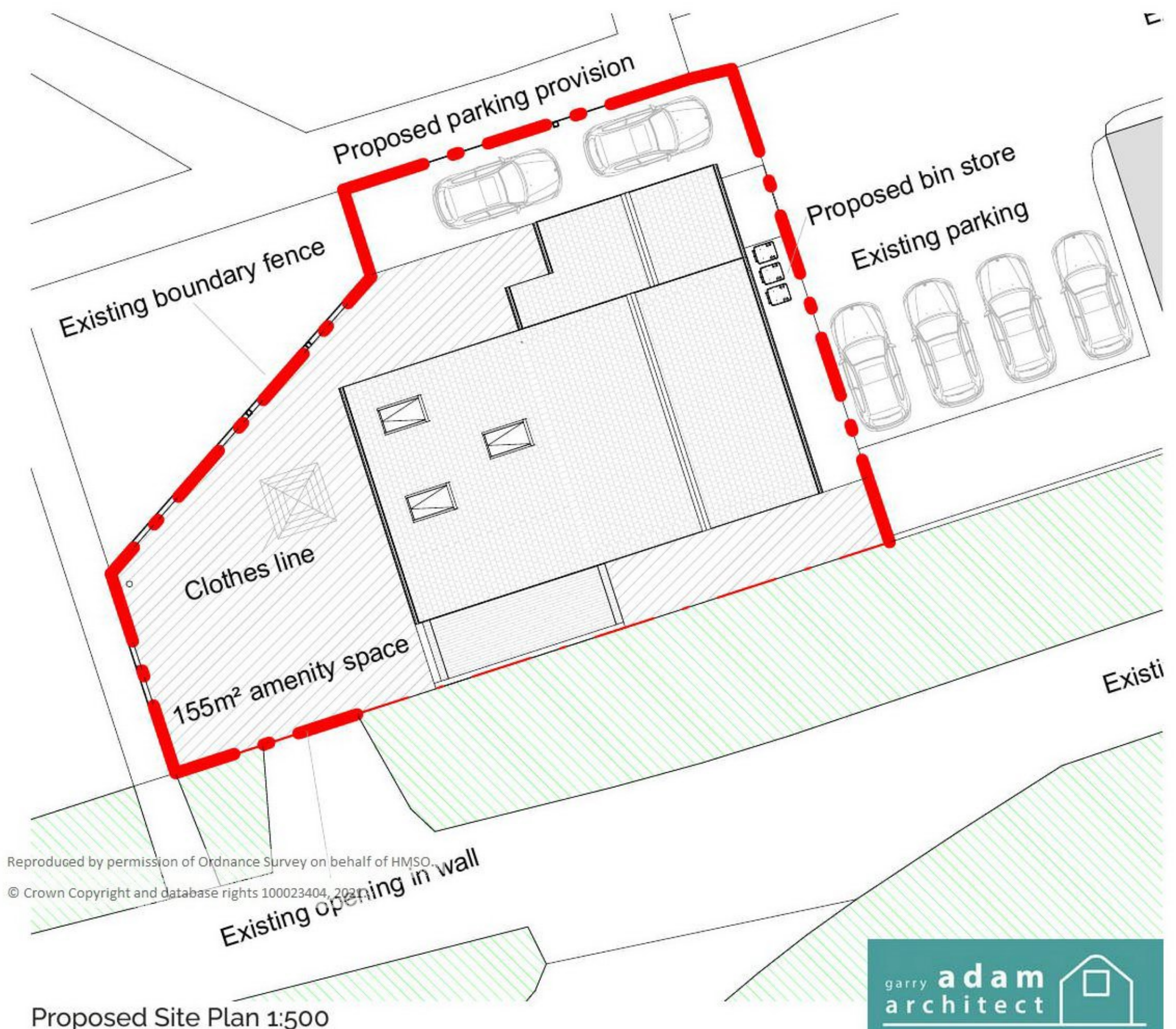
3.0 Proposed Works to the Coastguard Station

3.1 Proposed works

The existing Coastguard Station contains an internal garage for storing boats on the North end with its own garage door access, with a small office space, kitchen and wc facing South that can be accessed via the front door on the West elevation. The two spaces are connected internally via a standard timber door.

The Coastguard Station fabric consists of a masonry cavity wall construction with plaster-board internal lining for the office & WC. Externally there is a white rendered finish. The fascia and windows/doors are painted in blue with a tile roof and ridge cap.

The proposed accommodation is a two bedroom house with a ground floor kitchen/dining space, utility, study, wc, master bedroom suite and garage. The garage is positioned at the North of the site to provide direct access to the existing parking area and access road. The first floor contains the second bedroom with an ensuite and a living space. A patio door allows the kitchen/dining to open out to a sheltered patio facing Southward towards the sea views.

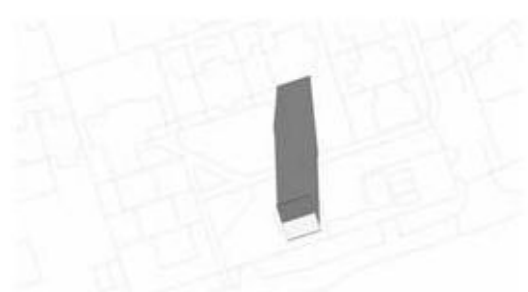


3.2 Design Rationale

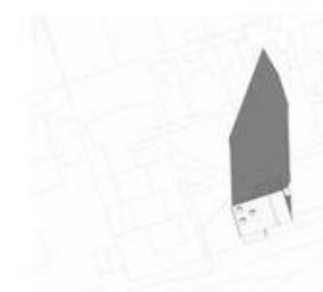
The aim of the design is to create a sensitive and modest intervention to enable an appropriate change of use to a derelict building. Our aim is to form a house which will function well as a family home, while maintaining a modest and unimposing scale and presence on site. To minimise overshadowing on neighbouring properties, the new roof pitch is kept low. As seen in the overshadowing analysis below, there is very minor overshadowing in the neighbours gardens. This helps keep the scale of the proposal in line with the existing context. The existing walls of the original fabric are retained with a new slapping opening the existing to the proposed kitchen/dining space. The floor area of the extension is compact and smaller than the existing floor area to allow the existing footprint to be dominant.

All glazing has deliberately been positioned on the Southern and Eastern elevations to avoid any potential overlooking issues with neighbouring buildings with the exception of one small window on the west elevation for kitchen ventilation. The upstairs bedroom two and living space have emergency escape windows that face the parking on the East elevation. The site boundary remains unaltered with the proposed access using the existing access route via Admiral Street as photographed previously. This will be discussed further in this documentation under the access statement.

The proposed site arrangement allows the parking to be located at the North behind the house, which is purposely set back from the boundary fence to create distance between the neighbouring garden. The West of the site is left paved as existing which provides foot access via a new gate. The main garden space is located at the South for privacy from the neighbours and to maximise the potential of the views toward the landscape and the sea. This arrangement allows for 155m² of amenity space for the users.



④ Existing Winter 12pm
1:1



⑤ Proposed Winter 12pm
1:1



① Existing Spring 12pm
1:1



⑥ Proposed Spring 12pm
1:1



② Existing Summer 12pm
1:1



⑦ Proposed Summer 12pm
1:1



③ Existing Autumn 12pm
1:1



⑧ Proposed Autumn 12pm
1:1

Overshadowing analysis

3.3 Materials

The proposed extension uses Marley Eternit cladding and maintains the existing rendered finish on the existing exterior walls. The proposed garage is a rendered finish to match the existing. The roof material is tile to match the existing roof. The extension utilizes a timber construction and existing walls will have a new internal lining. The existing concrete floor slab is retained and built upon to improve the thermal efficiency of the floor. The new floor construction for the extension will meet the finished floor level of the existing.

3.4 Energy & Sustainability

The proposal aims to retain as much of the existing building as possible with minimal alterations to the remainder of the site. The south elevation is heavily glazed to maximise solar gain and to permit quality daylight to the internal living spaces. A new internal lining is proposed to improve the thermal efficiency of the existing walls, while the new extension uses a highly insulated timber kit construction. This should help lower the running costs of the proposal. The proposal has a compact footprint and a lowered roof which both assist in the energy efficiency of the building while allowing into to not create contention with the neighbouring properties. The proposal will utilize an air source heat pump (ASHP) for the heating of the water and the internal spaces.

4.0 Access Statement

4.1 Current access provision:

Currently, the site can be accessed via Admiral street, where there is parking provision for four vehicles including a disabled space. The user can then access the property via a small timber gate on the north boundary. Alternatively, there is vehicular access via the route 1 cycle path to the front (South) of the property. The site does not currently have an accessible entrance. The site is flat with no noticeable level change.

4.2 Proposed access provision:

The cycle path at the South of the site is part of the Route 1 cycle network that is frequently used by both cyclists and pedestrians, many of which walking dogs. It therefore seemed logical to move the main direct access to the East side via the existing parking area. The garage has been positioned to allow ease of access, with space for a further two cars off to the side. This avoids the risk of potential incidents due to visibility of coming out the driveway at the South. Positioning the parking provision at the North side also frees up valuable garden space towards the South. The existing opening to the driveway on the South will be gated to allow privacy to the site. The main access door would then move to the North elevation from the West, via a sheltered accessible ramped entrance. The proposal retains the compact hallway to minimise the amount of circulation space internally. This makes the internal layout more compact and improves the efficiency of the layout.

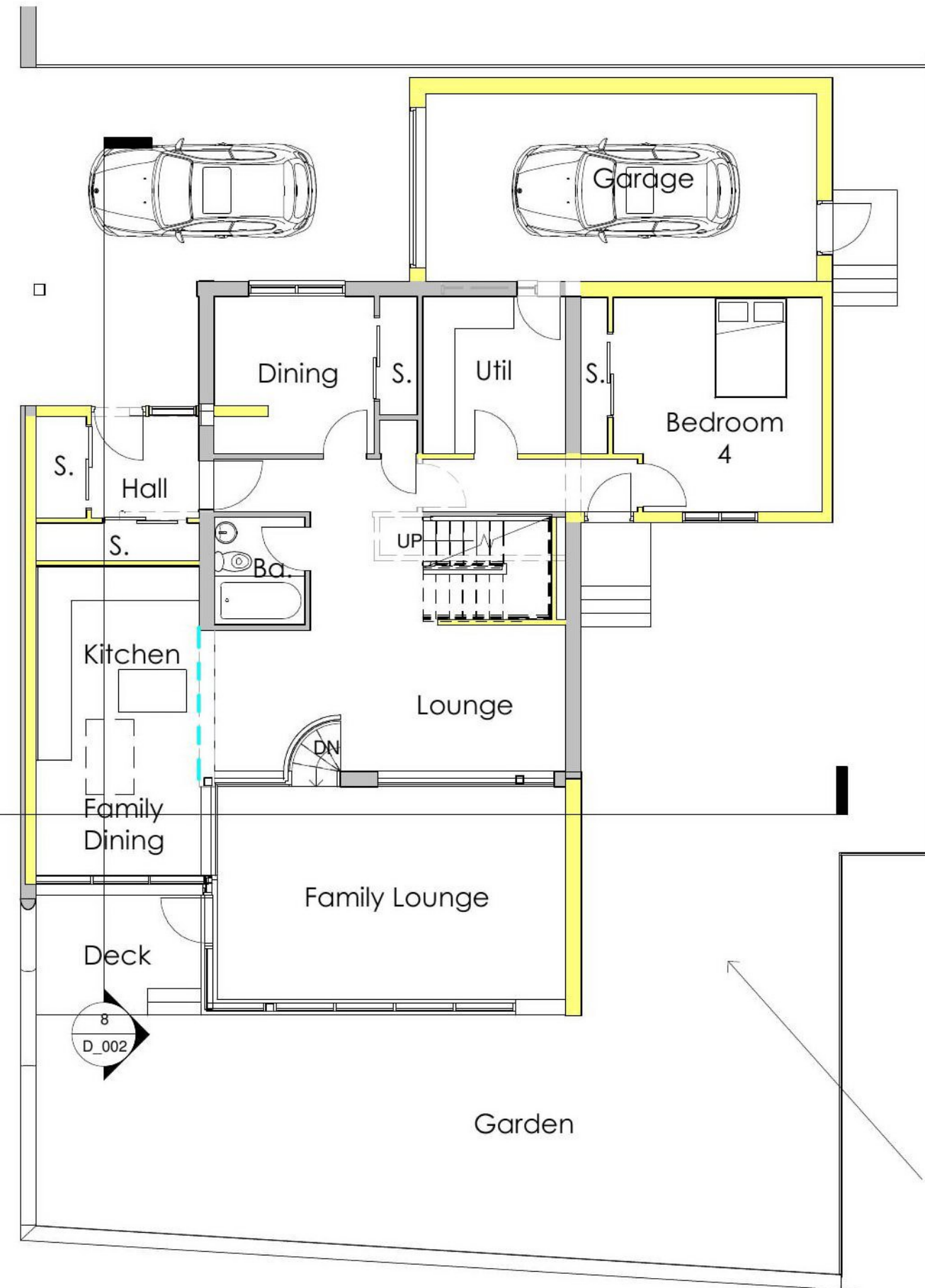
Disabled access is given to the house via a Building Regs compliant ramp to the new front door.

garry adam
architect

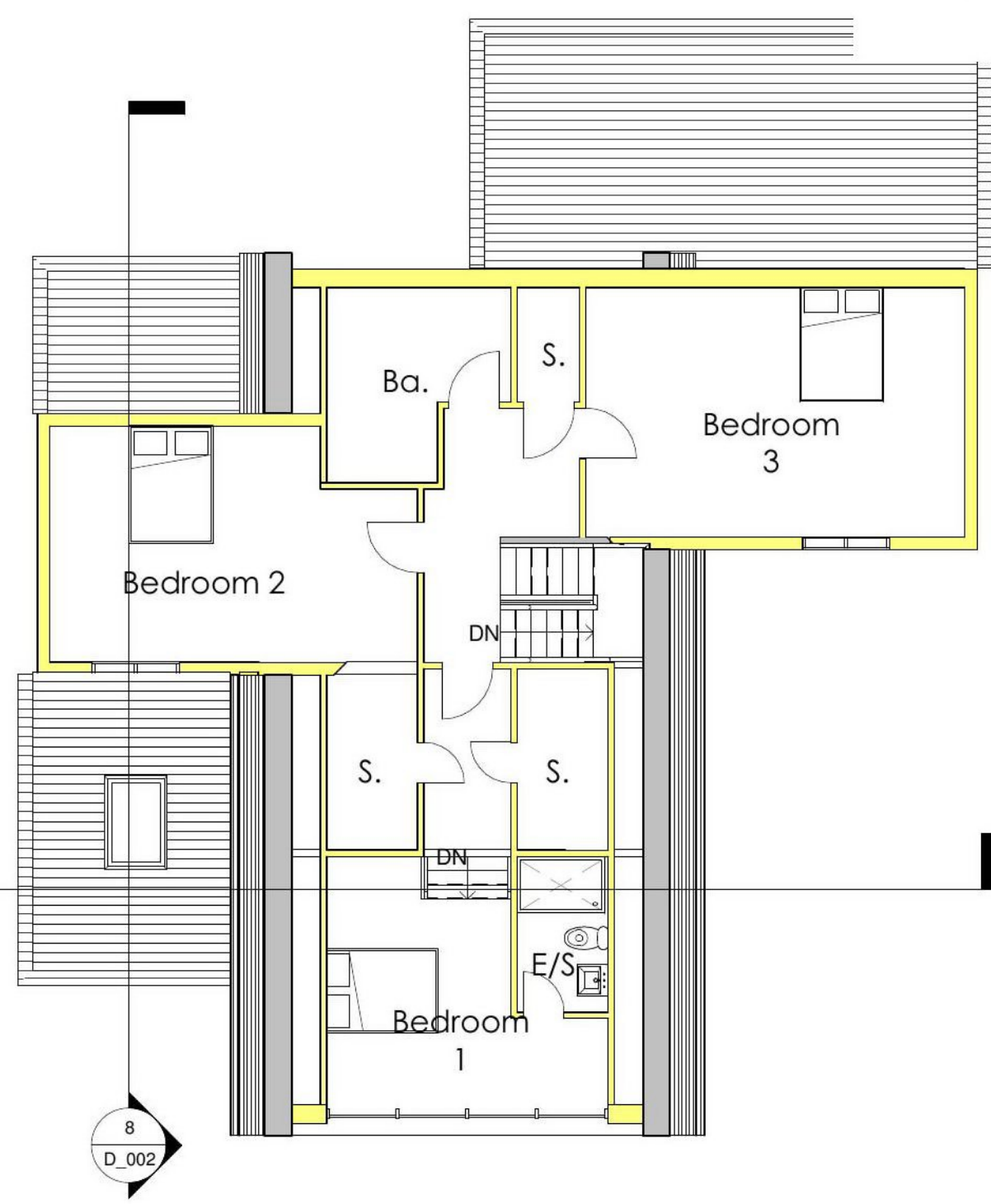


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INTIMATION OF PERMISSION



Proposed Ground Floor Plan
1 : 100

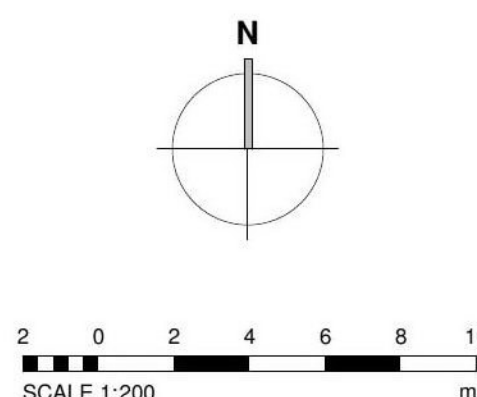


Proposed 1st Floor Plan
1 : 100



Site Plan
1 : 200

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143m² of Garden Amenity



North Elevation
1 : 100



West Elevation
1 : 100



Section 5
1 : 100

- Proposed 1st Floor Plan 2400
- Bedroom 1 Floor 1600
- Proposed Ground Floor Plan 0
- Lounge Floor -1000



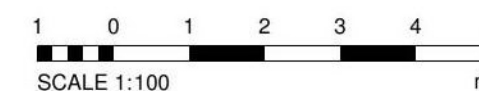
South Elevation
1 : 100



East Elevation
1 : 100



Section 4
1 : 100



REV	Description	Date

Client:
Hunter

Project:
10 Seabrae, Carnoustie

Sheet Name:
Plans, Elevations & Sections

Drawing Number:
2096_D_002



View Looking North



View Looking South



Seabraes Section

1 : 100

REV	Description	Date

Client: Hunter
Project: 10 Seabrae, Carnoustie
Sheet Name: Views and Street View

Drawing Number: 2096_D_004

paper size: A1 drawn by: Author checked by: Approver

AGENDA ITEM NO

REPORT NO 385/18

ANGUS COUNCIL**DEVELOPMENT STANDARDS COMMITTEE – 11 DECEMBER 2018****PLANNING APPLICATION - 10 SEABRAE CARNOUSTIE DD7 6AY****GRID REF: 357015 : 734554****REPORT BY SERVICE LEADER – PLANNING & COMMUNITIES****Abstract:**

This report deals with planning application No 18/00869/FULL for the alteration and extension of an existing Dwellinghouse for Mr and Mrs Hunter at 10 Seabrae, Carnoustie. This application is recommended for conditional approval.

1. RECOMMENDATION

It is recommended that the application be approved for the reason and subject to the conditions given in Section 10 of this report.

2. ALIGNMENT TO THE ANGUS LOCAL OUTCOMES IMPROVEMENT PLAN/CORPORATE PLAN

This report contributes to the following local outcome(s) contained within the Angus Local Outcomes Improvement Plan and Locality Plans:

- Safe, secure, vibrant and sustainable communities
- A reduced carbon footprint
- An enhanced, protected and enjoyed natural and built environment

3. INTRODUCTION

3.1 The applicants seek full planning permission for the alteration and extension of an existing dwellinghouse at 10 Seabrae, Carnoustie. The existing dwelling sits on a site measuring around 400 sq m that gently slopes in a north to south direction in line with the gradient of the street. The dwelling is a two bedroomed single storey bungalow that has been built within the sub divided curtilage of a traditional late Victorian/ early Edwardian villa property.

3.2 Seabrae is an unmade street that runs between Tayside Street and the foreshore between Westhaven Beach and Carnoustie Beach. The site is contained by a traditional stone wall of variable height on its west and south boundaries. The west boundary is contiguous with Seabrae and the existing site access is taken from the street. Number 3 Seabrae lies to the west of the street. Similar to the application property, 3 Seabrae is a modern bungalow that has been inserted into a sub divided former curtilage of a traditional property to the north. The south boundary of the site is contiguous with a public open space that is located on the foreshore. A tarmac access track lies beyond a verge at the foot of the boundary wall and a grassed open space lies beyond the track. The south boundary of the site sits around 45 metres back from the beach head.

- 3.3 The north boundary of the site is contained by a sectional ship lap fence at around 1.8 m in height beyond which lies the curtilage and private garden area of 6 Seabrae which is a two storey traditional semi-detached dwelling with a modern extension that is most likely a property formed through the sub division of a larger villa. The east boundary is contained by a sectional ship lap fence at around 1 metre in height with a roughly 300mm trellis running along its top. The southern extent of this boundary is also contained by mature vegetation. This boundary runs contiguous with the access and garden area of 8 Seabrae which is similar to Number 6 most likely part of a sub division of the original villa property, the curtilage of which has subsequently been sub divided to enable 10 Seabrae to be formed.
- 3.4 The proposal would entail the extension of the dwelling to the north into the existing access area to form a single storey integral garage. A ground floor bedroom would be added to the east. The south facing gable would be opened to facilitate the formation of an open plan kitchen/dining /living area with a further sun lounge area located within a lower south facing glazed section. A stair would be added within the existing house and an upper storey would be opened within the roof space of the existing house and the main extension areas. This would facilitate the formation of three further bedrooms. The resulting dwelling would be roughly 'T' shaped although the composition would be asymmetrical. The dwelling would have a strong facing emphasis accentuated by a double height glazed gable serving the ground floor sun room and the master bedroom. This feature would be built down into the gradient of the site.
- 3.5 The application has not been subject of variation. The nature of the proposal did not require that the application be the subject of press advertisement.

4. RELEVANT PLANNING HISTORY

18/00484/FULL for Alterations and Extension to Existing Dwellinghouse was withdrawn on 7 August 2018.

18/00714/FULL for Alterations and Extension to Existing Dwelling (Re-Application) was withdrawn on 26 October 2018.

5. APPLICANT'S CASE

The applicants' agent has produced a shadow analysis in support of the application. The analysis shows the throw of shadow from the dwelling as existing and as proposed during the spring, and autumn equinox and the summer and winter solstice.

The supporting information is available to view on the Council's [Public Access](#) system.

6. CONSULTATIONS

Community Council - There was no response from this consultee at the time of report preparation.

Angus Council – Roads (Traffic and Flood Prevention) - No objection in respect of road and traffic safety. In respect of flooding and drainage it is highlighted that the site is in the vicinity of the high probability coastal flooding extent as indicated on SEPA's flood maps and as such, the applicant should consider the utilisation of flood resilience measures in the construction of the proposed extension. It is further highlighted that as the application does not contain any detail in relation to surface water drainage; if alterations to the existing drainage system are proposed, then the developer should be required to submit details of surface water proposals for further written agreement prior to the commencement of development.

Scottish Water - There is sufficient capacity in the water supply and waste water treatment systems to accommodate the development. Surface water should be directed away from the

combined sewer system unless exceptional circumstances dictate otherwise.

7. REPRESENTATIONS

12 letters of representation from 11 properties were received in objection to the proposal. The letters of representation will be circulated to Members of the Development Standards Committee and a copy will be available to view on the council's [Public Access](#) website.

The main points of concern were as follows:

- **Loss of privacy/overlooking**- This matter is discussed further at Section 8 below.
- **Loss of view**- Loss of view is not a relevant planning consideration.
- **Overshadowing**- This matter is discussed further at Section 8 below.
- **Impacts on the road surface of Seabrae from use of vehicular access**- This matter is discussed further at Section 8 below.
- **Road safety**- This matter is discussed further at Section 8 below.
- **Overdevelopment of the area**- This matter is discussed further at Section 8 below.
- **Development out of character with the area**- This matter is discussed further at Section 8 below.

8. PLANNING CONSIDERATIONS

8.1 Sections 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997 require that planning decisions be made in accordance with the development plan unless material considerations indicate otherwise.

8.2 In this case the development plan comprises:-

- TAYplan (Approved 2017)
- Angus Local Development Plan (Adopted 2016)

8.3 As the application is not of strategic importance the policies of TAYplan are not referred to in this report and the policies of the Angus Local Development Plan (ALDP) form the basis for the consideration of the proposal. The relevant local plan policies are reproduced at Appendix 1.

8.4 Policy TC4 relates to proposals for house and flat alterations/extensions and development within the curtilage of houses and flats. It indicates that development will be supported where the siting, design, scale or massing of the proposal does not:

1. adversely affect the residential amenity enjoyed by the house or surrounding domestic properties including, in the case of microgeneration, through noise or shadow flicker;
2. detrimentally affect the character and/or appearance of the building, site or surrounding area; and
3. result in the overdevelopment of the plot or a loss of garden ground, parking or bin storage.

8.5 Policy DS4 relates to amenity and requires all proposed development to have regard to opportunities for maintaining and improving environmental quality. It indicates that development will not be permitted where there is an unacceptable adverse impact on the surrounding area or the environment or amenity of existing or future occupiers of adjoining or nearby properties. The policy identifies matters that will be taken into account and recognises that in some circumstances it will be appropriate to approve proposals that give rise to amenity impacts where they can be mitigated.

8.6 The site lies within the context of the existing urban area of Carnoustie. The existing house is

located within a medium density predominantly residential area where there is a wide variety of properties of differing styles and vintages. The proposal seeks to extend an existing dwelling from a two bedroom property to a four bedroom property with an integral garage and two lounges and in this respect the extent of the proposed extension is fairly significant. The proposal would undoubtedly result in a radical change in the style of the property. It does not however naturally follow that radical change is equal to negative change and on that basis the proposal needs to be considered on its own merits in terms of the policy context referred to above and in terms of the Council's published guidance on householder development.

- 8.7 Test 1 of Policy TC4 relates to impacts on amenity enjoyed by the house or surrounding domestic properties. The existing property; whilst fairly small is detached and is prominently sited on a plot that has been formed from what appears to be the former curtilage of a late Victorian or early Edwardian Villa (Crianville House; now sub-divided). The proposal seeks to introduce upper storey accommodation to a single storey property and as such consideration needs to be given to the potential for loss of privacy and amenity to be introduced through the overlooking of neighbouring property or through overshadowing or loss of sunlight and daylight resulting from physical increases in the size of the property.
- 8.8 In terms of overlooking and privacy impacts, the extension has been orientated in order that all new windows would be facing directly south towards the open space beyond the curtilage of the dwelling and the estuary beyond that. The only exception to this would be a row of high level windows serving the kitchen space. These windows would be a secondary light source to the main south facing window and would not represent an unacceptable or significant degree of overlooking towards the neighbouring property to the west. It is noted that a glazed porch and bathroom window are already located on the west elevation of the property and the introduction of a clearstory would be negligible in terms of its additional impact. The development would generally be in accordance with the Councils published guidance on window distances and distances between windows and blank walls. The exception to this would be the proposed west extension that would reduce window to wall distances between the application property and the property to the immediate west to a distance of around 8 metres from the original distance of 10 metres. Angus Councils published guidance on householder development states that main habitable room distances to blank walls should be in the region of 12 metres. There are two living room windows on the east facing elevation of the neighbouring property to the west. These are however secondary windows and the living space is also served by a large south facing bay window. Furthermore the guidance states that the characteristics of the existing area are relevant. It is noted that the proposed development would result in a relationship between properties that is entirely consistent with the established form of development to the north of Seabrae. Taking account of the character of the existing area and the nature of the impact on secondary windows, it is considered that the development would not result in an unacceptable impact on neighbouring property in terms of overlooking or loss of privacy.
- 8.9 In terms of sunlight and daylight impacts the main roof ridge of the dwelling runs north to south. The proposal would see this ridge extended southwards for a distance of 4 metres on a line consistent with the height of the existing ridge. Increased levels within the dwelling would be accommodated by building down into the gradient of the site. Whilst perpendicular ridges would be introduced running to the east and west of the existing footprint, their impacts would not be significant or unacceptable in terms of the additional impact on surrounding properties. Taking account of the existing impacts from the dwelling, surrounding properties and their boundary treatments, the proposal would represent marginal increases in terms of shadow throw as demonstrated by the submitted shadow study. The proposal has been assessed taking account of the characteristics of the site and its surroundings along with the councils published standards in respect of amenity impacts arising from householder development. There are no unacceptable impacts arising from the development when considered against test 1 of Policy TC4 or the amenity considerations of Policy DS4.
- 8.10 In terms of test 2 of Policy TC4 which relate to the character and appearance of the dwelling and

the surrounding area, the proposed extension would be fairly sizeable and would increase the footprint of the dwelling from around 70 sq m to 178 sq m (including a 30 sq m garage). There is no doubt that the proposal would completely alter the character and appearance of the dwelling. The existing dwelling is fairly small and occupies a plot that is around the size of a building plot that would be within acceptable limits for a family home within development boundaries. The existing dwelling is of modern standard appearance and does not contribute in any significant way to the character or appearance of the area. The resulting dwelling would utilise established traditional forms such as rectilinear plan forms and pitched roofs. There would be two minor flat roof sections but these would sit within nodes formed by the main plan form of the dwelling. The garage would also have a flat roof in order to reduce the likelihood of overbearing impacts in the garden area to the north. Overall, the resulting dwelling would respond well to its surroundings and would be orientated and emphasised to capitalise on the unbroken sea views to the south. This is a consistent feature with many properties in the area some of which have been reoriented to a south facing emphasis which is understandable given the nature of the southerly aspect in the area, the views it offers as well as the opportunity to capitalise on solar gain. The resulting composition would not have an unacceptable impact on the character or appearance of the area. The existing house sits on a frontage site and there is therefore no imperative reason why development should be restricted to single storey notwithstanding assertions made in letters of representation. The properties located closest to the foreshore in Carnoustie are varied in size and type and as previously mentioned, increasingly have been significantly altered to reorient them to a south facing outlook unless they have originally been designed in that manner in the first instance. In terms of impacts on the character and appearance of the existing dwelling, the extension would be transformational however there is no significant merit in the original dwelling and its substantive alteration would therefore positively impact on the wider area.

- 8.11 The final test of Policy TC4 is that development does not result in the overdevelopment of the plot or a loss of garden ground, parking or bin storage. As previously stated the site measures around 400 sq m. The resulting development would maintain current levels of off street parking and there would be ample space remaining for bin storage within the curtilage. A useable garden area of around 130 sq m would remain plus an area of around 15 sq m to the rear of the proposed garage. The level of development is consistent with modern plot ratios for new build houses within development boundaries and would not be at odds with the varied nature of plot ratios both on Seabrae and in the wider area. Overall, the proposal complies with Policy TC4 and DS4 and the Householder Development Planning Advice Note.
- 8.12 As stated at 8.1 above, planning decisions need to be made in accordance with the development plan unless material considerations indicate otherwise. In this case there have been eight objections received in relation to the development proposal. Most of the points of objection raised have been addressed in the foregoing discussion. The matters of road safety and impacts on the unmade surface of Seabrae resulting from use by vehicles accessing the site have not been discussed however. In terms of road safety, Seabrae is an unmade and unadopted track that serves 6 properties directly, including the application dwelling. The application dwelling has a direct vehicular access onto Seabrae which is understood to have been formed by the occupants. The formation of such an access onto an unadopted track is not subject of planning control and is considered to represent no more of a hazard to road safety or a burden in terms of its impact on the road surface than any of the other vehicular accesses on the street. The street is such that high vehicular speeds are unlikely to occur. The application has been reviewed by Angus Council Roads (Traffic) who raise no objection to the proposal in terms of parking standards or road and pedestrian safety. In addition, whilst the impacts of the development on neighbouring residential amenity have been duly assessed, the resulting dwelling could be altered under permitted development rights at some point in the future in a manner that could potentially result in upper storey overlooking of neighbouring dwellings and their curtilage. In order to safeguard against that possibility, a condition has been attached at Section 10 below which removes permitted development rights to alter the roof of the resulting dwelling or to form new openings or undertake any other alterations that are not an enlargement.

- 8.13 Consultation responses received in respect of the proposal are also material considerations. The comments in respect of surface water drainage received from Angus Council Roads (Flood Prevention) and Scottish Water in terms of surface water drainage as detailed at Section 6 are noted. This matter can be addressed by means of a planning condition requiring surface water drainage details to be further agreed in writing prior to the commencement of development. An appropriate condition is detailed at Section 10 below.
- 8.14 In conclusion the proposed alterations and extension would not result in an unacceptable impact on the dwelling and the surrounding area. The development would not have an unacceptable effect on amenity and would not affect parking, road safety or result in an unacceptable loss of garden ground. The proposal complies with policies DS4, TC4, of the Angus Local Development Plan (2016) and Angus Council's Householder Development Planning Advice Note. There are no material considerations that justify refusal of the application.

9. OTHER MATTERS

HUMAN RIGHTS IMPLICATIONS

The decision to grant permission/consent, subject to conditions, has potential implications for neighbours in terms of alleged interference with privacy, home or family life (Article 8) and peaceful enjoyment of their possessions (First Protocol, Article 1). For the reasons referred to elsewhere in this report justifying this decision in planning terms, it is considered that any actual or apprehended infringement of such Convention Rights, is justified. The conditions constitute a justified and proportional control of the use of the property in accordance with the general interest and have regard to the necessary balance of the applicant's freedom to enjoy his property against the public interest and the freedom of others to enjoy neighbouring property/home life/privacy without undue interference.

EQUALITIES IMPLICATIONS

The issues contained in this report fall within an approved category that has been confirmed as exempt from an equalities perspective.

10. CONCLUSION

It is recommended that the application be approved for the following reasons, and subject to the following condition(s):

Reason(s) for Approval:

The proposed alterations and extension would not result in an unacceptable impact on the dwelling and the surrounding area. The development would not have an unacceptable effect on amenity and would not affect parking, road safety or result in an unacceptable loss of garden ground. The proposal complies with policies DS4, TC4, of the Angus Local Development Plan (2016) and Angus Council's Householder Development Planning Advice Note. There are no material considerations that justify refusal of the application.

Conditions:

1. That no development in connection with the planning permission hereby granted shall take place unless full details of the proposed means of surface water drainage from the development have been submitted to and approved in writing by the planning authority. The surface water from the development shall thereafter be disposed of in full accordance with the approved details.

Reason: To ensure the provision of an acceptable form of surface water disposal from the development in the interests of the amenity of the area.

2. That notwithstanding the provisions of Schedule 1, Part 1, Classes 1D and 2B to the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 or any order amending, revoking or re-enacting that Order, once the development hereby approved has been completed, the upper storey of the dwelling shall not be altered by means of the insertion of any additional openings or extensions to the resulting roof without a further grant of planning permission from the planning authority.

Reason: In order to ensure that additional openings and roof alterations cannot be undertaken unless they have been fully considered in terms of their potential impacts on the residential amenity of adjacent and nearby properties.

**KATE COWEY
SERVICE LEADER - PLANNING & COMMUNITIES**

NOTE: No background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973, (other than any containing confidential or exempt information) were relied on to any material extent in preparing the above Report.

REPORT AUTHOR: KATE COWEY

EMAIL DETAILS: PLANNING@angus.gov.uk

DATE: 4 December 2018

APPENDIX 1: LOCATION PLAN

APPENDIX 2: DEVELOPMENT PLAN POLICIES

Appendix 1: Location Plan

Appendix 2

Development Plan Policies

Angus Local Development Plan 2016

Policy DS4: Amenity

All proposed development must have full regard to opportunities for maintaining and improving environmental quality. Development will not be permitted where there is an unacceptable adverse impact on the surrounding area or the environment or amenity of existing or future occupiers of adjoining or nearby properties.

Angus Council will consider the impacts of development on:

- Air quality;
- Noise and vibration levels and times when such disturbances are likely to occur;
- Levels of light pollution;
- Levels of odours, fumes and dust;
- Suitable provision for refuse collection / storage and recycling;
- The effect and timing of traffic movement to, from and within the site, car parking and impacts on highway safety; and
- Residential amenity in relation to overlooking and loss of privacy, outlook, sunlight, daylight and overshadowing.

Angus Council may support development which is considered to have an impact on such considerations, if the use of conditions or planning obligations will ensure that appropriate mitigation and / or compensatory measures are secured.

Applicants may be required to submit detailed assessments in relation to any of the above criteria to the Council for consideration.

Where a site is known or suspected to be contaminated, applicants will be required to undertake investigation and, where appropriate, remediation measures relevant to the current or proposed use to prevent unacceptable risks to human health.

Policy TC4: Householder / Domestic Development

Proposals for householder development (including alterations/extensions to houses and flats, development within the curtilage of houses and flats, means of enclosure, satellite antenna and domestic scale microgeneration) will be supported where the siting, design, scale or massing of the proposal, does

not:

- adversely affect the residential amenity enjoyed by the house or surrounding domestic properties including, in the case of microgeneration, through noise or shadow flicker;
- detrimentally affect the character and/or appearance of the building, site or surrounding area; and
- result in the overdevelopment of the plot or a loss of garden ground, parking or bin storage.

Further guidance on householder development will be set out in a Householder Development Planning Advice Note.

NOTES

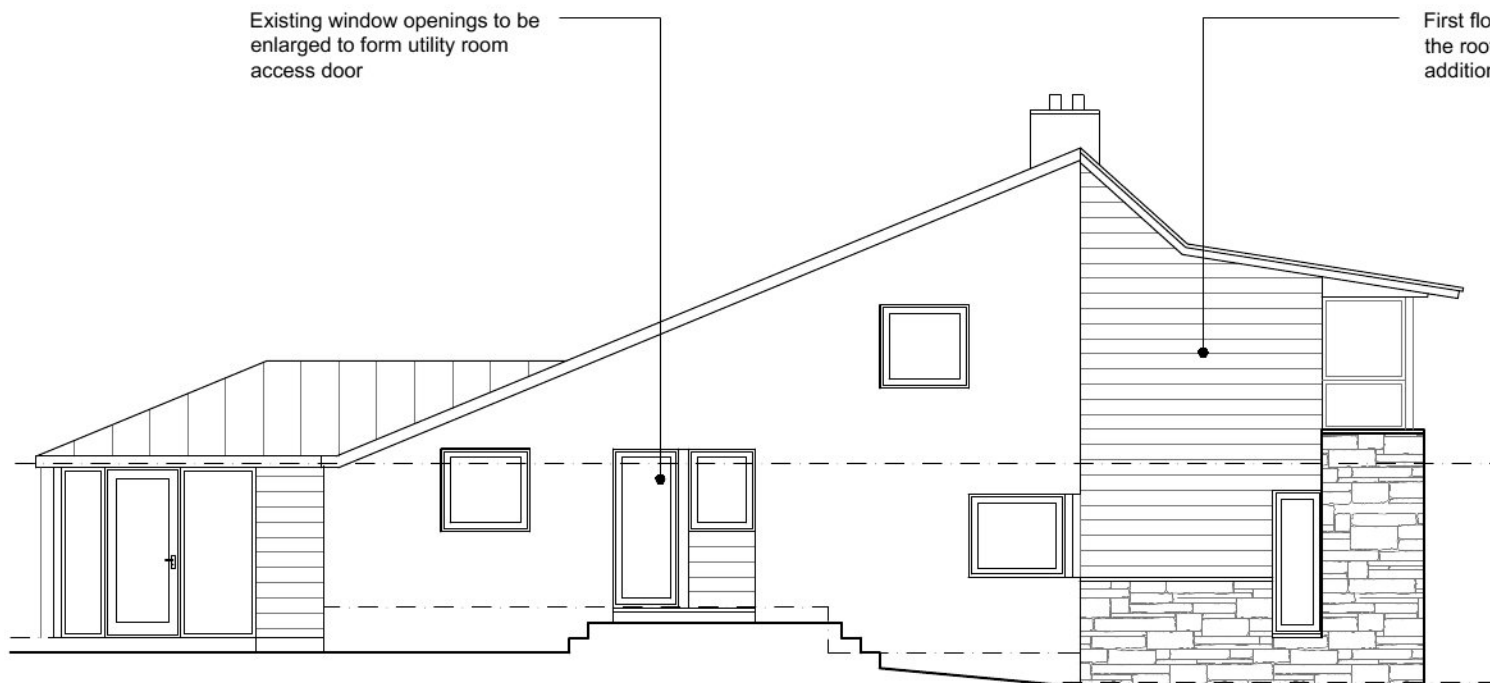
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CONTRACTORS MUST WORK ONLY TO FIGURED DIMENSIONS WHICH ARE TO BE CHECKED ON SITE.

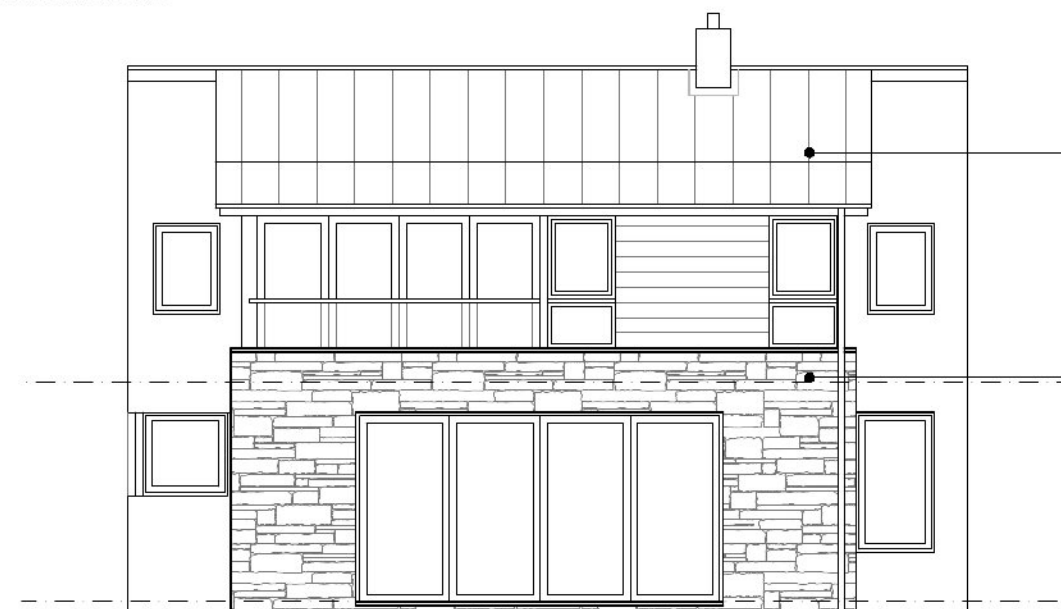
REV.	DATE	DETAILS	DRAWN	CHECKED

Existing window openings to be enlarged to form utility room access door

First floor area to be extended with the roof line altered to form an additional bedroom and en-suite



SOUTH WEST ELEVATION



Standing seam zinc roof

Existing wall to be over-clad in natural sandstone by Denfind

SOUTH EAST ELEVATION

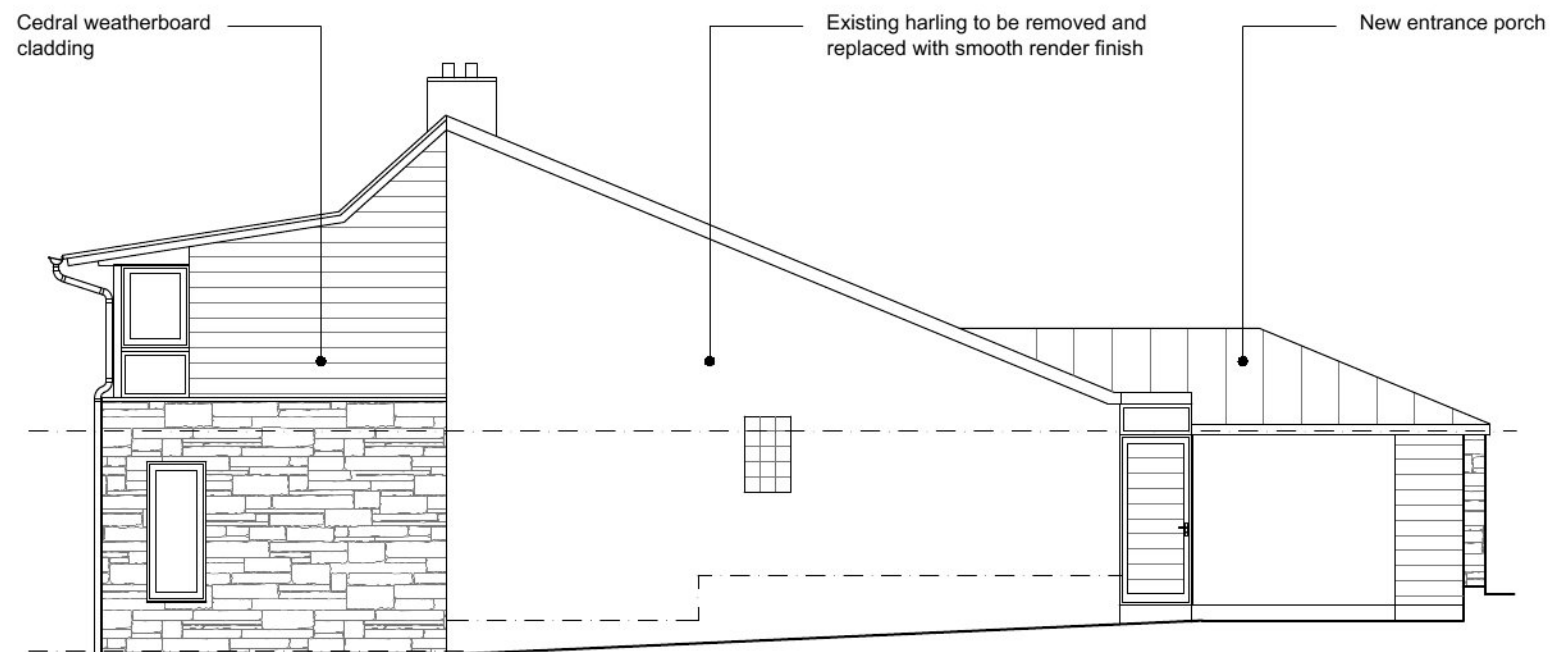
MATERIALS

ROOF
CONCRETE TILES TO REMAIN ON PRINCIPLE ROOF.
STANDING SEAM ZINC TO PORCH AND FIRST FLOOR EXTENSION AREAS

WALLS
EXISTING HARLING TO BE REPLACED WITH SMOOTH RENDER FINISH

HORIZONTAL CEDRAL CLADDING TO THE UPPER LEVEL OF THE PROPOSED EXTENSION.

NATURAL SANDSTONE CLADDING AS INDICATED

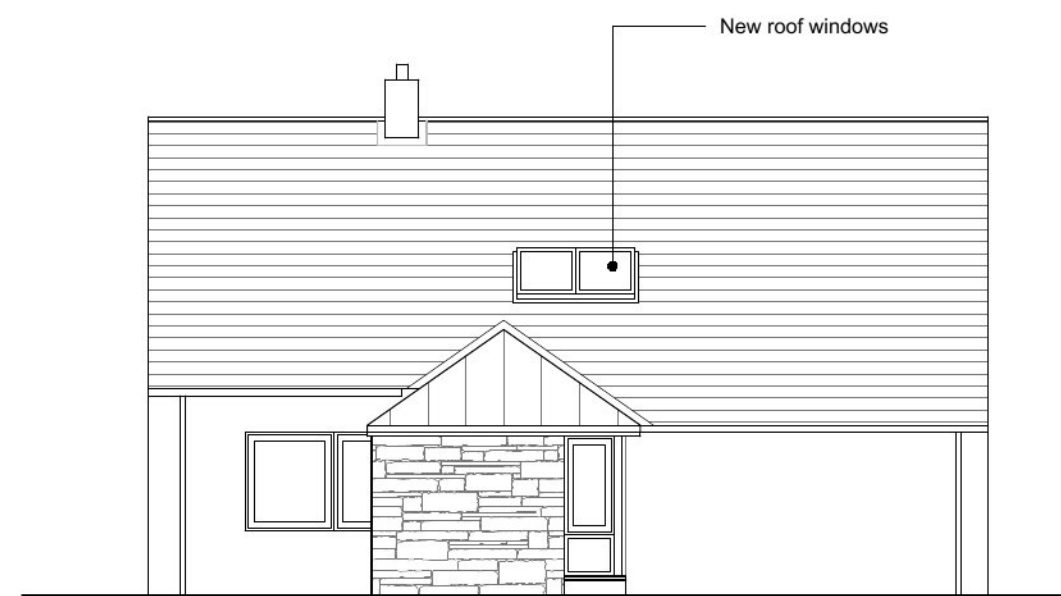


Cedral weatherboard cladding

Existing harling to be removed and replaced with smooth render finish

New entrance porch

NORTH EAST ELEVATION



New roof windows

NORTH WEST ELEVATION

Town & Country Planning (Scotland) Act 1997 As Amended

APPROVED ON BEHALF OF THE ANGUS COUNCIL
SUBJECT TO THE CONDITIONS SET FORTH IN
INTIMATION OF PERMISSION

PROPOSED ELEVATIONS 1:100 @ A3



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PROJECT:
ALTERATIONS AND EXTENSION
TO 4A LONG ROW

DRAWING:
PROPOSED ELEVATIONS

STATUS: **PLANNING**

DRAWN BY: DATE: PROJECT NO:
NC DEC 19 17020

CHECKED BY: DATE: SCALE:
NC DEC 19 1:100 @A3

DWG NO: REV:
SD-03 A

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APPROVED ON BEHALF OF THE ANGUS COUNCIL
SUBJECT TO THE CONDITIONS SET FORTH IN
INTIMATION OF PERMISSION



VIEW FROM SOUTH

3D VIEW NTS @A3

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PROJECT:
ALTERATIONS AND EXTENSION
TO 4A LONG ROW

DRAWING:
DRAFT 3D VIEW

STATUS: **PLANNING**

DRAWN BY:	DATE:	PROJECT NO.:
NC	DEC 19	17020

CHECKED BY:	DATE:	SCALE:
NC	DEC 19	1:100 @A3

DWG NO.:	REV.:
SD-05	A

Angus Council

Application Number:	20/00053/FULL
Description of Development:	Alterations, Front and Rear Upper level Extension to House and Demolition of Existing Car Port
Site Address:	The Chalet 4A Long Row Carnoustie DD7 6BE
Grid Ref:	357254 : 734699
Applicant Name:	Mr Alastair Sawers

Report of Handling

Amendments

The application has not been subject of variation.

Publicity

The application was subject to normal neighbour notification procedures.

The nature of the proposal did not require that the application be the subject of press advertisement.

The nature of the proposal did not require a site notice to be posted.

Planning History

None.

Applicant's Case

Consultations

Community Council - There was no response from this consultee at the time of report preparation.

Angus Council - Roads - Offered no objection to the application but would advise that the footway crossing must be formed and constructed in accordance with Angus Council standards. An informative note has been added to the decision notice regarding footway crossing formation.

Scottish Water - Offered no objections but advised there needs to be a limit to an increase to existing discharge rate and volume. Alternative rainwater options should be considered. No new connections will be permitted to the public infrastructure and additional surface water will discharge to existing private pipework within the site.

Representations

There have been no letters of representation.

Development Plan Policies

Angus Local Development Plan 2016

Policy DS4: Amenity

Policy TC4: Householder / Domestic Development

TAYplan Strategic Development Plan

The proposal is not of strategic significance and the policies of TAYplan are not referenced in this

report.

The full text of the relevant development plan policies can be viewed at Appendix 1 to this report.

Assessment

Sections 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997 require that planning decisions be made in accordance with the development plan unless material considerations indicate otherwise.

Policy TC4 relates to proposals for house and flat alterations/extensions and development within the curtilage of houses and flats. It indicates that development will be supported where the siting, design, scale or massing of the proposal does not:

1. adversely affect the residential amenity enjoyed by the house or surrounding domestic properties including, in the case of microgeneration, through noise or shadow flicker;
2. detrimentally affect the character and/or appearance of the building, site or surrounding area; and
3. result in the overdevelopment of the plot or a loss of garden ground, parking or bin storage.

Policy DS4 deals with amenity and requires all proposed development to have regard to opportunities for maintaining and improving environmental quality. It indicates that development will not be permitted where there is an unacceptable adverse impact on the surrounding area or the environment or amenity of existing or future occupiers of adjoining or nearby properties. The policy identifies matters that will be taken into account and recognises that in some circumstances it will be appropriate to approve proposals that give rise to amenity impacts where they can be mitigated.

In this case the relationship of the proposal with surrounding property has been assessed and it does not give rise to any significant amenity impacts beyond those that are typically found in an area of this nature. It does not have a significant adverse impact on the character and appearance of the dwelling or wider area. It does not result in overdevelopment of the plot or unacceptable loss of garden ground, parking or storage. The Roads Service has reviewed the proposal and offered no objection in terms of road safety. The proposal is broadly compatible with relevant Council guidance as set out Angus Council's Householder Development Planning Advice Note.

In conclusion the proposal is broadly consistent with relevant Council guidance contained in published planning advice notes and is compatible with development plan policy. There are no material considerations that justify refusal of the application and a planning obligation is not required.

Human Rights Implications

The decision to grant permission/consent, subject to conditions, has potential implications for neighbours in terms of alleged interference with privacy, home or family life (Article 8) and peaceful enjoyment of their possessions (First Protocol, Article 1). For the reasons referred to elsewhere in this report justifying this decision in planning terms, it is considered that any actual or apprehended infringement of such Convention Rights, is justified. The conditions constitute a justified and proportional control of the use of the property in accordance with the general interest and have regard to the necessary balance of the applicant's freedom to enjoy his property against the public interest and the freedom of others to enjoy neighbouring property/home life/privacy without undue interference.

Equalities Implications

The issues contained in this report fall within an approved category that has been confirmed as exempt from an equalities perspective.

Decision

The application is approved subject to conditions

Reason(s) for Decision:

1. That the proposed development complies with relevant policies of the Angus Local Development Plan and the supplementary guidance of the Householder Development Planning Advice Note. There are no material considerations that justify refusal of the application.

Conditions:

1. That, prior to the commencement of the widening of the existing vehicle access, the adjacent cyclists ahead road warning sign shall be relocated to a position to be further agreed in writing with the Planning Authority in consultation with the Roads Authority.

Reason: In the interests of road safety.

Notes:

1. Please note that the footway crossing must be formed and constructed in accordance with the Roads standards of Angus Council. An application to form a new or alter an existing vehicle crossing over a footway or verge of a public road form can be downloaded from Angus Council's website at www.angus.gov.uk/transport_and_streets/roads_and_pavements

Case Officer: Pauline Chalmers

Date: 26 February 2020

Appendix 1 - Development Plan Policies

Angus Local Development Plan 2016

Policy DS4: Amenity

All proposed development must have full regard to opportunities for maintaining and improving environmental quality. Development will not be permitted where there is an unacceptable adverse impact on the surrounding area or the environment or amenity of existing or future occupiers of adjoining or nearby properties.

Angus Council will consider the impacts of development on:

- Air quality;
- Noise and vibration levels and times when such disturbances are likely to occur;
- Levels of light pollution;
- Levels of odours, fumes and dust;
- Suitable provision for refuse collection / storage and recycling;
- The effect and timing of traffic movement to, from and within the site, car parking and impacts on highway safety; and
- Residential amenity in relation to overlooking and loss of privacy, outlook, sunlight, daylight and overshadowing.

Angus Council may support development which is considered to have an impact on such considerations, if the use of conditions or planning obligations will ensure that appropriate mitigation and / or compensatory measures are secured.

Applicants may be required to submit detailed assessments in relation to any of the above criteria to the Council for consideration.

Where a site is known or suspected to be contaminated, applicants will be required to undertake investigation and, where appropriate, remediation measures relevant to the current or proposed use to prevent unacceptable risks to human health.

Policy TC4: Householder / Domestic Development

Proposals for householder development (including alterations/extensions to houses and flats, development within the curtilage of houses and flats, means of enclosure, satellite antenna and domestic scale microgeneration) will be supported where the siting, design, scale or massing of the proposal, does not:

- adversely affect the residential amenity enjoyed by the house or surrounding domestic properties including, in the case of microgeneration, through noise or shadow flicker;
- detrimentally affect the character and/or appearance of the building, site or surrounding area; and
- result in the overdevelopment of the plot or a loss of garden ground, parking or bin storage.

Further guidance on householder development will be set out in a Householder Development Planning Advice Note.

APPENDIX 3

FURTHER LODGED REPRESENTATIONS

Jane Conley

From: maureen [REDACTED]
Sent: 13 February 2022 17:41
To: Sarah Forsyth
Subject: RE: Application for Review - Coastguard Station, 35 Admiral Street,Carnoustie

Dear Sarah,

Thankyou for your letter. My husband and I still stick by our original comments, and are even more concerned about the parking facilities down here.

As I said before at least nine cars park down here and we really need more, also delivery lorries sometimes have a problem and cause blockages, even the bin lorries sometimes do not get right in and we have to take bins out to the straight part of Admiral Street. Actually the whole of Admiral St has a parking problem sometimes. Also rumours of this property being an Air B&B eventually is not helping situation. On a personal note we keep getting letters and bills for this property, we have been at this address no 15 Admiral St. since 1984 and quite a few companies still seem to have the Coastguard property as no 15. It is becoming quite a nuisance. Hope this can be sorted out.

Maureen and Ian Burgess.

from [Mail](#) for Windows

From: [Sarah Forsyth](#)
Sent: 09 February 2022 15:02
Subject: Application for Review - Coastguard Station, 35 Admiral Street,Carnoustie
Importance: High

Dear Sir/Madam

Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013
Application for Review – Change of Use and Extension of the Former Coastguard Service Building to a Domestic Dwellinghouse (Non-Determination) – Miss S Alexander
Application No 21/00590/FULL - DMRC-2-22

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review as a result of the non-determination of the application within the period allowed. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee.

In accordance with the above Regulations, I am required to ask you if you wish to make any further representations. The Review Committee will be given copies of your original representation. If you do wish to do so, you have 14 days from the date of receipt of this email to make such representations. **These should be sent directly to me.**

The applicant will then be sent a copy of these representations and the applicant will be entitled to make comments on them. These comments will also be placed before the Review Committee when it considers the review.

I can also advise that a copy of the Notice of Review and other documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 | ForsythSL@angus.gov.uk | www.angus.gov.uk
Work pattern: Mon, Tues (am) & Thurs

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Think green – please do not print this email

Jane Conley

From: [REDACTED]
Sent: 22 February 2022 22:09
To: Sarah Forsyth
Subject: RE: Application for Review - Coastguard Station, 35 Admiral Street, Carnoustie

CONFIDENTIAL EMAIL - INTENDED RECIPIENT ONLY

CONFIDENTIAL

Dear Sarah

*** Apologies - I have slightly amended the email I sent earlier this evening following advice from a planning expert. Please can you treat this email as my representation to the Committee***

I refer to your email of 9 February and have set out further representations below (which should be viewed alongside the representations I made on 8 September 2021 and supplementary representations made on 13 September 2021 – the vast majority of which have been ignored by the applicant in her "*Statement of Reasons for Seeking Review*" document).

Please also note that the representations set out below are supported by each of the other 11 "representees" who put forward objections to the proposal. It is also worth noting that of the 17 neighbours who were required to be notified of the proposal, 12 went to the effort of objecting – that illustrates the consensus among neighbouring properties in relation to their strong objection to this proposal.

I note that your email below states I have 14 days from the date of receipt of your email (9 February) within which to make representations. Presumably that gives me until 23:59 on 23 February to make any further or amended representations but I would be grateful if you could confirm please?

Responses to the Applicant's Statement of Reasons for Seeking Review

The further representations set out below are numbered so as to correspond with the relevant section of the applicant's Statement of Reasons for Seeking Review document:-

The Proposal

3.1 It is stated that the proposal has "*characteristics of buildings in the surrounding area*". That is incorrect as the proposal would see a new large two-story house bordering almost directly on to the coastal path when the character of the area is predominantly that of a seaside location, with small, single-storey cottages/houses/outbuildings along the coastal path. Whilst there are some larger properties in the area, these are all set back from the coastal path whereas the proposal here would border directly on to it. It is also noteworthy that although the applicant recognises that the originally submitted elevation drawings for the proposal were wrong, no effort appears to have been made to submit corrected drawings rectifying the errors in the original drawings.

3.3 The applicant states here that "*The proposal was analysed to assess any overshadowing of surrounding properties and the roof pitch and height kept to a level which protects the surrounding area*". Taking each of those points in turn:-

- Overshadowing. I go into more detail on the overshadowing point against paragraph 9.15 below but, as a headline point, the overshadowing analysis submitted by the applicant only shows the impact at midday (when the sun is at its highest and any shadows at their

lowest/most minimal). My understanding is that it is good/standard practice for overshadowing analysis to also show the impact in the morning, afternoon and evening too. It is telling here that no such analysis has been provided as, even at midday, the shadow of the new building will overshadow the windows in our kitchen, living room, upstairs office (I work from home) and one of our upstairs bedrooms – at least two, if not three, of which qualify as habitable rooms – together with nearly our entire garden. This overshadowing issue also affects our neighbours. Despite raising these concerns in my original representations, the applicant's response is simply to say that the "analysis indicates that this should not be an issue" yet no further analysis has been provided. If two/three of our "habitable" rooms are overshadowed to an unacceptable extent at midday then they will definitely also be overshadowed throughout the rest of the day – that is an issue because it is an unacceptable adverse impact on the amenity of my property caused directly by the increased height and size of the proposed new building.

It is certainly not clear how the "*proposal protects the surrounding area*" when it actually causes a significant overshadowing issue for neighbouring proprietors. It is also worth noting that the nearby Seabrae application which the applicant here has flagged as being in point (and which is described in more detail below), contained a much more encompassing overshadowing analysis with the impact shown at 9am, midday, 3pm and 6pm yet no such analysis is provided here – presumably because any such analysis will show that overshadowing is a significant issue here;

- Height. The overshadowing issue referred to above is caused by the height of the proposed building being almost 1.5m higher than the existing elevation (an increase of almost 25% on existing height). This substantial increase in height is certainly not something which protects the surrounding area. It is also telling that neither of the two nearby applications referred to here as being relevant to this one involved any increase to the height of the existing elevation.

Policy Considerations

8.2 to

8.5 Policy DS1 does set out certain circumstances where proposals are to be supported **but only when** they are in accordance with the policies of the Angus Local Development Plan 2016 ("ALDP"). Although the proposal is within the Carnoustie development boundary (although only just as the site is right on the border of 'open space protection') and involves the re-use of a vacant building, it falls foul of a number of the relevant policies of the ALDP. The applicant appears to simply gloss over this point by stating that we "*contend that the proposal is acceptable*" without providing any reasons why (or responding to the various points set out in the representations made to date by neighbouring proprietors).

I have set out below the specific areas, in terms of the ALDP, on which the proposal is deficient:-

- the proposed new building has an unacceptable adverse impact on the amenity of nearby properties as a direct result of the overshadowing it will cause – **thereby specifically failing to comply with policies DS4 and TC2 of the ALDP**. Nothing has been submitted to rebut that other than (i) a glib statement that "*the analysis indicates that this should not be a significant issue for neighbouring properties*" when the analysis actually provided by the applicant points to overshadowing definitely being an issue and (ii) comments in the passing by a case officer that are not relevant, or indeed admissible, to the application/this review;
- the proposed elevation of the new building (an increase in height of almost 1.5m) does not fit within the character and pattern of the surrounding area. Not one house in the surrounding area as close to the coastal path (and right on the border of open space protection – see policy DS1 of the ALDP) is anything like that height. My understanding is that two applications for higher/taller buildings in nearby Seabrae were refused or withdrawn (which the applicant conveniently omits to flag when referring to the 10 Seabrae application here – that it is an

amended version of an application that was withdrawn twice) and so it would be obtuse for this application to be approved. The proposal here would see a large building (outwith the character and pattern of the surrounding development) "shoe-horned" in to an unsuitable space – there would be no "coherent structure of streets, spaces and buildings" as set out in policy DS3 of the Angus Local Development Plan 2016. It is also not going to fall within the affordable housing bracket given (i) the amount paid by the proprietor to buy the site at auction (£156,000) and (ii) the proposed size of the house and its location. **In light of all of that, the proposal clearly fails to comply with policies TC2, DS3 and DS4 of the ALDP;**

- Policy DS4 focuses on unacceptable adverse impact on the surrounding area or amenity of existing or future occupiers of nearby properties. The following are given as examples in DS4 – (i) light pollution, (ii) effect and timing of traffic movement to, from and within the site, car parking and impacts on highway safety and (iii) residential amenity in relation to overlooking and loss of privacy, outlook, sunlight, daylight and overshadowing. For obvious reasons, every single one of those three items will be adversely affected for the occupiers of nearby properties as a result of the proposed new building here. Policy DS4 goes on to concede that the Council may support development which is considered to have an impact on such considerations but only if mitigating or compensatory measures are secured. However, in this case, it is impossible for any appropriate or reasonable mitigating or compensatory measures to be secured for nearby properties and so **it will not be possible for the proposal to comply with policy DS4;**
- although the Council's Roads team is correct to flag that no consent is required for the creation of an access and it is also correct that access on to an unadopted road is not subject to planning control, there is still a requirement to comply with the relevant policies of the ALDP. Each case is to be decided on its own merits and, here, the existing car park is already fully utilised by existing residents and so to suggest in the applicant's Design and Access Statement that the proposed new building could also use that car park is nonsensical. Many of the current users are elderly and so cannot be expected to park further away in Admiral Street and walk a significant distance in order to facilitate extra users of the car park as a result of the proposed new building. The increased traffic (and proposed new garage) right next to the back gate of my property causes me significant safety concerns as I have two young children who regularly use that gate (and my neighbours also have young children). On a more granular level, the proposed site plan appears to show two parking spaces within the boundary of the property and as a continuation from the parking available beside the existing pavement. That simply does not work as cars currently park right up to the boundary of the property and so the two 'new' spaces would effectively be blocked in (the photos on p.6 of the Design and Access Statement submitted by the applicant even show why that would happen – the white Citroen car illustrating the problem that putting the two parking spaces there would cause). From a legal perspective, the lack of proper vehicular access to this site is surely a concern for the new owner who paid the eye-watering sum of £156,000 for the site in an auction process (especially given the issues with vehicular access jumped out from the sale particulars). **In summary, regardless of the Council's Roads team's comments, the proposed access and parking for the new building appear to fall short of policies DS4 and TC2 of the ALDP** as, aside from not actually working, the proposals would certainly cause an unacceptable impact on access and amenity for existing neighbouring residents;
- the proposal also fails to comply with the Council's Planning Advice Note 14 in relation to Small Housing Sites as set out separately at para 9.8 below.

9.3 This paragraph states that the case officer had noted (i) concern with the proposal in terms of the site being small and a larger building on such a small site not being consistent with the character and pattern of development in the surrounding area and (ii) buildings closest to the coastal path being small and single storey in appearance. The applicant then goes on to claim that the surrounding area has a mix of single and two storey buildings of a variety of size and scale. That is being somewhat economical with the truth as although there are larger buildings in the surrounding area, they are all set a good distance back from the coastal path and none of them sit right on the coastal path (as would be the case with the proposal here).

Related Case – 10 Seabrae

9.4/
9.5 The 10 Seabrae application for an extension is highlighted by the applicant as a positive assessment and approval of a similar and neighbouring proposal. It is not clear why though as there are a number of significant differences between the two applications:-

- the first is in relation to height/elevation. The existing roof height has been maintained at 10 Seabrae and is not being raised. It is also worth noting that the height of the approved 10 Seabrae application is 5.3m and so over 1.5m less than the proposed height of the new building here!
- although the length, size and footprint of the property at 10 Seabrae are being increased by a reasonable amount, the overshadowing analysis provided as part of that application (which is much more encompassing than that provided here and sets out the position at 9am, midday, 3pm and 6pm) shows that none of the neighbouring properties there are impacted by overshadowing. As noted elsewhere in these representations, that is certainly not the case with the proposal at hand because of the height of the proposed new building;
- the application for 10 Seabrae that was approved is the third iteration of a planning application by the owners for that particular property. The previous two applications by the owners of that property – both of which involved a two storey building with an increase in height/elevation - were withdrawn because they were about to be unsuccessful (and as a result of the number of local objections due to overshadowing and other similar issues to the application here). It is notable that the reduction in height of that application was ultimately approved without any objections from neighbours as a result of the change in design of the building and maintenance of its existing height. If the applicant here amended her application in a similar vein with the existing roof height not being raised then perhaps many of the current objections and representations being made would fall away;
- notwithstanding that the height of the property at 10 Seabrae is nothing like as high as the proposal at Admiral Street, the property at 10 Seabrae sits a lot further back from the coastal path than the proposal here (which will sit directly on the coastal path). It is slightly disingenuous for the application to state that both properties sit around 45m back from the beach head as, although that may be true, because of the way the beach head slopes, it means that the proposed new building at Admiral Street sits much closer to the coastal path than 10 Seabrae;
- it is an extension to an existing residential house.

I would therefore submit that the approval of the application at 10 Seabrae has no bearing on the application at hand because of the completely different character and circumstances (and so is irrelevant).

Related Case – 4A Long Row

9.5 There appear to be two paragraphs 9.5 in the applicant's statement. This paragraph 9.5 refers to another nearby property that had a planning application approved and so is apparently in point to the proposal here. Again, it is not clear why as there are significant differences between the two applications:-

- as with 10 Seabrae above, the existing ultimate roof height here has been maintained and has not been raised;
- although the first floor area has been extended, it has had no impact on the overall height of the building and any overshadowing that the extended first floor has caused was not raised as an

issue by either of the neighbouring proprietors on each side of the property (both of whom are family-relations of the owner of 4A Long Row);

- although the building at 4A Long Row has been enlarged, there were no objections at all from neighbouring proprietors – presumably because, on one hand, the extension was “neutral” to the neighbours on the other side of Long Row as a result of the existing height of the property not being raised and, on the other hand, the neighbours immediately on each side of the property are family relations of the owner;
- 4A Long Row does not sit on the coastal path (which terminates in excess of 200 yards short of the property). It is also a completely different street to Admiral Street and, whilst relatively nearby in a town sense, the character of Long Row is completely different to the site at Admiral Street; and
- it is an extension to an existing residential house.

Again, I would submit that the approval of the application at 4A Long Row should therefore have no bearing on the application here because of the differing character and circumstances (and so is irrelevant).

Both related cases referred to above

9.6 Although the two cases referred to above are examples of larger nearby properties being approved by the Council, both of those applications had entirely different circumstances to the application at hand (for the reasons outlined above).

Plot Coverage and Garden Ground

9.8 to

9.10 The small housing sites planning advice note (Advice Note 14) on the Angus Council Planning portal states that a general guide for a minimum plot area is 400 square metres but that a lower minimum of 350 square metres may be appropriate depending on any unduly adverse effect the proposal may have on neighbouring properties. The site area here is 330 square metres in a fairly densely populated area so surely does not comply with the Angus Council planning guidance note?

Similarly, the advice note states that the house should not cover more than 30% of the overall plot. On the basis of the plans submitted and, to the naked eye, it appears that the house here covers a lot more than 27% of the overall plot and so, again, is in contravention of the advice note. The SUDS/drainage point referred to at para 9.21 below is also relevant here.

The applicant is seeking to have a large house “shoe-horned” into an insufficiently sized plot here and fails to meet the minimum requirements of the advice note.

Overshadowing

9.15 This states that the “overshadowing created by the proposal is mainly contained within the closest area around the property - its own ground and neighbouring open space”. That is simply not true. On the basis of the overshadowing analysis submitted by the applicant (which only shows the impact at midday when the sun is at its highest and any shadows at their lowest/most minimal), the shadow of the new building will overshadow the windows in our kitchen, living room, upstairs office (I work from home) and one of our upstairs bedrooms – at least two, if not three, of which qualify as habitable rooms – together with nearly our entire garden. This overshadowing issue also affects our neighbours. Despite raising these concerns in my original representations, the applicant’s response is simply to say that the “analysis indicates that this should not be an issue for neighbouring

properties” yet no further analysis has been provided. My understanding is that it is good/standard practice for overshadowing analysis to also show the impact in the morning, afternoon and evening too and it is telling here that no such analysis has been provided. It is also worth noting that the nearby Seabrae application which the applicant here seems to think is in point, contained a much more encompassing overshadowing analysis with the impact shown at 9am, midday, 3pm and 6pm yet no such analysis is provided here – presumably because any such analysis will show that overshadowing is a significant issue here. My understanding is that it is expected of an application that the greater part of any overshadowing caused by a new building should be confined to the applicant’s own land. Even with the very limited midday overshadowing analysis provided by the applicant (when shadows are at their smallest), you can see that there are significant overshadowing issues for my property caused by the height of the proposed new building. Applying an overshadowing analysis with different times of the day when shadows are greater only serves to accentuate those issues for my property and so cause an unacceptable impact on the amenity of me as a neighbouring proprietor – my house will be in shadow for much of the day and much of the year as a result of the significant increase in height to the existing Coastguard building.

Traffic and Road Safety

- 9.16 The proposal would create a new vehicular access onto the road. Contrary to what is stated in the application, vehicles do not access the site from Admiral Street, the existing access is from the cycle track to the south. A new access here would remove on street parking for the existing properties to the north and west of the site. Those houses do not have their own off-street parking and no alternatives are available for them if the on-street spaces were to be lost through the proposed development. If the new access were to be granted, the displacement of the cars which currently park on street at the point of the proposed access would have an adverse impact on the capacity and safe operation of surrounding streets which already experience high levels of on-street parking.

The applicant seeking to draw a parallel here with the approved application at 10 Seabrae does not work here either. Seabrae is a dirt road/path whereas Admiral Street is a “normal” tarmac road with a much higher volume of traffic and a greater number of users who require to park on the street. Although no consent is required for the creation of an access and it is also correct that access on to an unadopted road is not subject to planning control, there is still a requirement to comply with the relevant policies of the ALDP and the proposal here fails to do so as it causes an unacceptable impact on access and amenity for existing neighbouring residents by (i) reducing available parking space, (ii) making access for elderly neighbouring residents more difficult and (iii) increasing the chances of an accident by creating an additional access next to where children play. On the last point about children playing, if the Council does ultimately approve this aspirational application and a child is subsequently injured because of the additional access here, the neighbouring residents will be extremely quick to point out that the dangerous nature of the additional access had been highlighted to the Council a number of times as part of the process we are going through at the moment.

Natural Heritage

- 9.20 The bat survey submitted is not a bat survey. It is simply an email from someone living hundreds of miles away with no knowledge of the site, nor having visited the site, saying that there are no bats in the area (having simply carried out a desktop survey from Google Earth!). As anyone that has actually visited the local area knows, there are numerous bats in the vicinity. Many are found on the golf courses, railway embankment, beach and open spaces in the local area. If a further bat survey has been submitted by the applicant after the one submitted in July 2021, I have not yet seen it (although have asked for a copy).

Drainage

9.21 The applicant states on the application form that SUDS is proposed. However, there is no indication of where or how this would fit into the plot (contrary to what that information being requested on the application form). Scottish Water states that no connection will be granted to connect surface water into the sewer so SUDS will be required. Factoring SUDS into the site will further reduce the area available for development and again points to the symptoms of the proposal representing overdevelopment of the site (and failing to meet the Council's Planning Advice Note 14).

Conclusion

10.1 I would like to pick up on a few of the applicant's concluding statements:-

"The proposal, in terms of scale, form and design can be accommodated within the surrounding area without detriment to its character and amenity"

- Not true on character. The buildings currently bordering on to the coastal path are small single-storey cottages/houses/outbuildings. The proposal here would result in a large two-storey house being "shoe-horned" on to a small insufficiently sized plot. The building would also be significantly higher than any other buildings bordering directly on to the coastal path. The proposal would lead to the possibility of all of the other garages, cottages and buildings in this area seeking to increase their scale and height to the detriment of the character of the area;
- Not true on amenity. There is a significant overshadowing issue on my property and other neighbouring properties that has not been acknowledged by the applicant – presumably because the applicant knows it is a significant issue that has an unacceptable adverse impact on the amenity of neighbouring properties. The increased traffic movement, car parking issues and road safety issues also have an unacceptable adverse impact on amenity.

"Although proposing a significant alteration to the existing building this can be acceptable in terms of the Council's detailed policies, as demonstrated by the approval of a nearby proposal, as referred to in this statement"

- Not true. The application fails to meet a number of the Council's detailed policies under the ALDP – notably DS4, TC2, DS3 and by extension DS1. It also fails to comply with Council's Planning Advice Note 14 which is directly in point as it is aimed at Small Housing Sites. The various representations made by me and others as part of the overall process set out why and how these policies are not met by this proposal whereas the applicant appears not to have put forward any explanation or examples of how the proposal does meet the policies – the explanation given simply seems to be "we contend that the proposal is acceptable". If an application can be approved while failing to comply with a plethora of Council policies (and an advice note that is directly in point to the situation at hand) then that surely raises questions on the process/review and the possibility of a subsequent challenge (legal or otherwise)
- as highlighted in significant detail above (at paragraphs 9.4 to 9.6), the nearby proposals which did receive approval from the Council relate to entirely different circumstances to the application here – particularly in relation to height/elevation - and so do not demonstrate anything in relation to this application (other than to highlight deficiencies in this application).

"The proposal meets with the requirements of the Council's detailed policies and overall we contend, gains support from the Angus Local Development Plan. We do not believe that there are any materials considerations that indicate otherwise"

- Not true. Apologies if I am labouring the point but I am seeking to mirror/track the path of the applicant's submission. For the reasons outlined above, the application fails to meet a number of the Council's detailed policies under the ALDP – notably DS4, TC2, DS3 and by extension DS1. It

also fails to comply with Council's Planning Advice Note 14. If 'considerations' that fall squarely within examples of items or matters that fail to meet the detailed policies (for example, insufficient ratio to comply with advice note 14, overshadowing and daylight/sunlight issues, detrimental effect on character and amenity of surrounding area) are not material then, again, if the application is approved, it calls in to question the validity of this whole process.

General

Background: As a local solicitor with an understanding of property values, the applicant paid far in excess of market value to acquire the site/plot (£156,000 in an auction process). That is an eye-watering amount to pay for a site of that size in Carnoustie (even taking into account the site's proximity to the beach/seaside). The applicant is clearly seeking to recoup some of that financial outlay by trying to get approval for a house that is unsuitable and far too big for the size of plot so that it can then be sold for the applicant to get a financial return. Building a house of a more appropriate size on the plot – for example, a single story building that retains the height of the existing building and is similar to others in the area – would not provide the applicant with the financial return that she is seeking because of the inflated price paid at auction. If the application is approved in its current form then it will be to the significant detriment of neighbouring proprietors and the surrounding area and would clearly indicate that the Council values remote wealthy investors over local residents.

Overdevelopment: The proposal would result in a large, two-storey house with a footprint almost double the size of surrounding properties on plots that are closer to the size of the one proposed. The resultant property would be 'shoe-horned' into the site to maximise the value of the site, but this would detract from the character of the area.

Character/Pattern of Development: The design of the building is akin to a warehouse or an agricultural shed. The long, low roof pitch would be completely at odds with any of the surrounding properties and is nothing more than an attempt to mask the symptoms of over developing the site. I do not think the principle of a house on the site is unacceptable, it is more that the design of the proposed house is out of scale and character with its surrounding. As mentioned previously, if the proposal was for a house with a roof height the same as the existing building on the site then that would be more reasonable and more likely to be palatable to neighbouring proprietors but the particular scale and design currently proposed by the application is unacceptable and so should be refused on that basis.

Resultant Impact: The proposal would lead to the possibility of all of the other garages, cottages and buildings in this area seeking to increase their scale and height to the detriment of the character and amenity of the area. **It is worth noting that a number of local houses have recently been acquired and the new owners will be watching the outcome of this application closely – particularly the new owner of the massive site at 2 Long Row!!**

Alternative Uses: The Design and Access Statement indicates the proposed new building is intended to be a family home. Given the remoteness of the owner of the site (our understanding being that she is South East-based) and the price at which a house such as the one proposed would sell for, we have serious concerns that the intention is to develop this site and then rent it out as holiday accommodation through sites such as Airbnb or other short term let accommodation. Our neighbours also share this serious concern. If that proved to be the case then it would be extremely detrimental to neighbouring properties. The applicant should be clear and honest to the community about what they propose. If approval is considered appropriate (which it should not for the reasons

stated above), it should be made clear to the applicant on the decision notice that any form of short term let type accommodation would not be acceptable and that consent from the planning authority should be required for such

Derelict Building: It is stated several times in the applicant's submission that the property in question is currently a derelict building. That paints an untrue picture of the property – although vacant, it is in good repair and certainly not derelict.

In light of all of the above, I respectfully submit that the application in its current form should be refused by the Review Committee.

If a call or meeting would be useful to discuss any of this (or further information is required) then please let me know.

Best Regards
Chris



From: Sarah Forsyth <ForsythSL@angus.gov.uk>
Sent: 09 February 2022 15:02
Subject: Application for Review - Coastguard Station, 35 Admiral Street, Carnoustie
Importance: High

Dear Sir/Madam

Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013
Application for Review – Change of Use and Extension of the Former Coastguard Service Building to a Domestic Dwellinghouse (Non-Determination) – Miss S Alexander
Application No 21/00590/FULL - DMRC-2-22

I refer to the above planning application and your lodged representations to that application.

I write to advise you that the applicant has made an application for a review as a result of the non-determination of the application within the period allowed. This is a process brought in by the above legislation to enable applicants dissatisfied with a decision of the Planning Authority to ask for it to be reviewed. This review will be made by Angus Council's Development Management Review Committee.

In accordance with the above Regulations, I am required to ask you if you wish to make any further representations. The Review Committee will be given copies of your original representation. If you do wish to do so, you have 14 days from the date of receipt of this email to make such representations. **These should be sent directly to me.**

The applicant will then be sent a copy of these representations and the applicant will be entitled to make comments on them. These comments will also be placed before the Review Committee when it considers the review.

I can also advise that a copy of the Notice of Review and other documents related to the review can be viewed by contacting me directly.

In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 | ForsythSL@angus.gov.uk | www.angus.gov.uk
Work pattern: Mon, Tues (am) & Thurs

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Jane Conley

From: [REDACTED]
Sent: 21 February 2022 09:44
To: Sarah Forsyth
Subject: Re: Application for Review - Coastguard Station, 35 Admiral Street, Carnoustie

Dear Sarah Forsyth

I am writing with regard to the review of the planning application for the former Coastguard building at 35 Admiral Street. My main concern as before is the possible deterioration of the already inadequate parking facilities in this area of Admiral Street. For the thirteen properties on the site, there exist a maximum of nine parking spaces. This of course does not take into account the possible vehicles of visitors, or even more importantly, access for emergency vehicles.

The former Coastguard building already has perfectly adequate parking facilities to its front from the roadway which is consistently used by all types of vehicles - indeed there are several lock-ups and garages which already open on to the roadway.

I would reiterate that any loss of parking spaces in this particular section of Admiral Street will inevitably result in displacement parking to already congested neighbouring streets. As before we consider this to be contrary to Policy DS4.

Kind regards, Colin and June Christison (25 Admiral Street)

Sent from my iPad.

On 9 Feb 2022, at 15:02, Sarah Forsyth <ForsythSL@angus.gov.uk> wrote:

Dear Sir/Madam

Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013
Application for Review – Change of Use and Extension of the Former Coastguard Service Building to a Domestic Dwellinghouse (Non-Determination) – Miss S Alexander
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In the meantime, should you have any queries please do not hesitate to contact me.

Kind regards

Sarah

Sarah Forsyth | Committee Officer | Angus Council | T: 01307 491985 | ForsythSL@angus.gov.uk
| www.angus.gov.uk
Work pattern: Mon, Tues (am) & Thurs

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APPENDIX 4

APPLICANT RESPONSE TO FURTHER LODGED REPRESENTATIONS



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Sarah Forsyth
Committee Officer
Angus Council

By email: ForsythSL@angus.gov.uk

14th March 2022

Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2013

Application for Review – Change of Use and Extension of the Former Coastguard Service Building to a Domestic Dwellinghouse (Non-Determination) – Miss S Alexander Application No 21/00590/FULL - DMRC-2-22

Applicant's response to further representations from interested parties

The three representations submitted to the Council have been reviewed and the following comments are submitted under topic headings. The one lengthy representation submitted addresses several topics and takes the form of a rebuttal of the content of the applicant's submitted Statement of Reasons for Seeking Review. The applicant's case in seeking approval of the application is set out in detail in the Statement and therefore we will not repeat this again here, other than brief comments in relation to the following topics.

Parking and Traffic

It is noted that the impact of the proposal on car parking, traffic and road safety has been raised again. We emphasise that sufficient on-site car parking is provided to meet with the Council's Roads Authority requirements. The area of Admiral Street adjacent to the site is an unadopted road, and as such, there is no roads authority consent required and no planning control over forming the access on to this area. It is unfortunate that there is concern with parking availability in this area but it is not material to the consideration of this application.

The Council's Traffic Manager, Roads provided comments to Planning on 30/09/21 and concluded that *'I have considered the application in terms of the traffic likely to be generated by it, and its impact on the public road network. As a result, I do not object to the application.'*

Reference to examples of other development in the area – 10 Seabrae and 4A Long Row
Reference was made in the Statement of Reasons for Seeking Review (the Statement) to highlight that relatively large and well-designed modern development has been considered acceptable by the Council in the coastal edge of Carnoustie, relatively close by. We acknowledge that these are different cases with different characteristics and that every application requires to be determined on its own merits. However, reference to these developments illustrates that there is a mix of scale and height of houses on the coastal

edge of Carnoustie, including these new build extensions.

Plot Size and Garden Ground

It is noted that a representation questions the compliance of the proposal with the Council's guidance. We reiterate that the proposal is consistent with the Council's Small Housing Sites guidance in terms of plot ratio and amenity space. It had been acknowledged in the Statement that the overall plot size is less than stated in the guidance, at 400 sqm. However, it was highlighted in the Statement that this is 'a general guide only' and a lower minimum is potentially acceptable. It was also highlighted that this proposal achieves re-use of an existing brownfield site and vacant building and that accepting this proposal, on this slightly reduced plot area, achieves overall benefits with re-use of the site for a dwellinghouse, consistent with the Council's objectives and Policy DS1: Development Boundaries and Priorities. We understand that decision making in the planning process is based on a 'balance' of considerations.

Overshadowing

Reference is again made in a representation to overshadowing. An 'Overshadowing Analysis' was prepared and submitted by the architect. It was the Council's role to assess the analysis and to request further information should this have been considered necessary to enable proper assessment of the proposal. The case officer provided feedback to the architect during the application process, stating that the proposal had been 'fully assessed'. No concern was raised regarding the content of the 'Overshadowing Analysis'.

Bat Survey

As indicated in the Statement, a qualified professional bat surveyor recommended that no bat survey was required as the site and existing building had practically no potential as a bat roost. This conclusion was reached using remote assessment, judged by the surveyor to allow for a suitable assessment. There may be bats in the area, as noted in the representation submitted, but it is the 'roost' potential which requires to be assessed in terms of the site and building. This conclusion was accepted by the application case officer, without a request for any further information.

Compliance with Policies

A representation has taken view that the proposal does not comply with the full set of Council policies. The Applicant's Statement makes a case for approval on the basis that the proposal can be supported by the policies and guidance of the Local Development Plan.

Short-term letting

The speculation in representations that the proposed dwellinghouse will be used for short-term letting is not a planning consideration in this case. The applicant has no intention of letting the property.

In any case, short-term letting would require a licence from the Council, in terms of the Civic Government (Scotland) Act 1982 (Licensing of Short-term Lets) Order 2022. We are not aware of Angus Council introducing short term let control areas (in terms of the Planning (Scotland) Act 2019 which would require planning approval for a material change of use of a dwellinghouse.

In summary, the issue of short-term letting should not be a consideration in the determination of this application.

Non-planning considerations

One of the representations refers in length to matters which are not material planning considerations and cannot be considered in determining the application. These include speculation on the home location of the applicant and potential future use of the dwellinghouse for short-term letting (referred to above), along with references to the price paid for the property. These comments should be given no consideration in the assessment of the application and the Development Management Review Committee's decision. However, the applicant is concerned that inaccurate statements have been made and will be in the public domain. She wishes to make a response to these comments although she is aware that these are not matters which should influence the decision. For the Development Management Review Committee's general information, the applicant states that:

'Susan Alexander, the applicant is the daughter of a local farmer at Dummiesholes, Carmyllie, and was born, brought up and lived in the local area for many years. Whilst Susan is currently living in the North West of England, she is very much a local person. Susan's family and siblings all live in the local area, and many of her friends reside in Carnoustie and the wider area. Susan intends to use the property as her own home and has absolutely NO intention, what so ever, of renting the property out on a short or long term basis.'

'It is also worth mentioning that the £156,000 paid for this property and plot in 2021, which is claimed to be an eye watering sum of money, is simply an amount in line with current prices, which was evident based on the number of people prepared to pay up to this price when the applicant purchased the property at auction. In fact, the objector paid £192,400 for their 2 storey, 4 bed property which is on a similar plot in 2012, nearly 10 years prior, and I'm sure they must be aware of rising property prices since then.'

Summary

With respect, the applicant seeks Members of the Development Management Review Committee to take note of the above comments and her original submitted Statement and to conclude that her proposal to re-purpose Carnoustie's vacant former coastguard station merits approval.