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## **Response to planning application 24/00096/PPPM for football stadium and other works at land to the west of the Ice Arena and land within Camperdown Park, Dundee.**

### **Introduction and Summary**

Dundee Civic Trust welcomes the opportunity to comment on this application for planning permission in principle for a new stadium and other works at land to the west of the Ice Arena and land within Camperdown Park, Dundee.

The stadium, with other enabling works which are essential to assist the financial viability of the development, is the wrong development in the wrong place. Nearly every aspect presents issues that are difficult to accept, including:

1. the unsafe, dangerous and congestion-inducing transportation proposals;
2. the substantially increased car use which will be inevitable, given the relatively isolated location from existing residential centres;
3. the fact that the excessive congestion in the whole area will not be limited to football match days, but will extend to the times – possibly over more than one day – when the stadium will be used as a “concert venue set-up – 8,000-20,000 [spectators]”;
4. the residential developments for the proposed 180 homes, both flats and houses, which are contrary to the Local Development Plan;
5. the hotel, situated on the outskirts of the city rather in the centre, which is contrary to policies in the Local Development Plan 2019 [LDP2];
6. the crematorium, for which no significant demand is established, and which is unsuitably located;
7. the increase in commercial operations, which will adversely affect other businesses, and are contrary to Town Centre First Policy and which will result in loss of jobs elsewhere;
8. the lack of any published consideration of alternative solutions in the Club’s existing site, or ground sharing at Tannadice;
9. the additional environmental pollution and carbon emissions, both in the construction and the subsequent use of the development;
10. the poor design of many aspects of buildings, especially the stadium itself, open areas, housing and access arrangements;
11. the area not being suitably developed as a 20-minute neighbourhood;
12. the encroaching on to green, public open spaces which have for decades been set aside for public enjoyment, and the use of which is enshrined in legislation;



13. the consequential destruction of trees, flora, open land, and visual amenity, which provide for the well-being of park and tourist visitors;
14. the insufficient ambition in the proposed energy uses, though some aspects are commendable; and
15. the many planning matters which contravene (despite assertions to the contrary by the applicants) many of the national and local policies and guidelines, such as the recent National Planning Framework [NPF4], LDP2, Town Centre First Policy, and Active Travel guidelines.

It is not possible to comment on every aspect of the application. Some matters will have to wait until more detail is apparent in any planning application for full permission. For now, we will look in some detail at:

1. Transport
2. Planning Supporting statement
3. Design and Access
4. Energy and Sustainability.

Dundee Civic Trust recommends that this application in principle be refused. However, we accept that Dundee FC must do something in order that the Club can progress as an important part of the city's sporting and economic future. So in this submission we suggest ways in which Dundee FC can develop the improved facilities which it needs.

If Dundee City Council is minded to approve this in-principle application, and then to move to consider any application for full permission, the following matters should in our view be thoroughly researched and included as planning conditions before full planning approval is granted. We see these as crucial to the development being completed and succeeding:

1. The Transport and Access Plan must be completely reviewed and its replacement must demonstrate an ability to deal with all the issues raised in this submission, failing which, consent should be refused.
2. It must be demonstrated that resources are available to deliver the offsite road, the pedestrian and cycling infrastructure and that these works are completed before any development is occupied.
3. The stadium must be operational before the housing and commercial developments are occupied.
4. The ice rink extension is to be used only for sports and recreational purposes in the event that its use for ice sports ceases.
5. The training pitches, situated in a currently public area of the Park, must be available for public use.

Dundee Civic Trust SCIO  
18 March 2024



## Response to planning application 24/00096/PPPM for football stadium and other works

### 1. Transport and Access Issues

Dundee Civic Trust has serious concerns over the traffic implications of the above proposal. There are many other planning issues to consider, but we consider that the proposal fails principally on the grounds of road safety, congestion and pollution.

Our main concerns, relating primarily to the A90 (Kingsway) Trunk Road are as follows:

1.1 **Systra Traffic analysis.** In the planning application, the traffic analysis by Systra refers to the 300 or so cars that will have to use a new access off Kingsway. This seems to be incorrect, as it ignores the other car park for the training pitches, the 60 parking spaces for flats residents, and the hotel users, all of whom will use the proposed access, and this will amount to 200 more vehicles than mentioned in the analysis, and even more congestion than has been planned for.

Also, the analysis ignores the fact that many fans will have to arrive by car or bus, and a very large number of supporters' cars will use the existing car park at Camperdown Leisure Park. The park contains around 800 parking spaces, of which 665 are uncontrolled public spaces serving the Ice Arena and cinema. Very many more cars will be used as transport to the football matches than can be accommodated in the dedicated, planned car park, so this large, available car park will undoubtedly be used by football fans. The residents in the 120 or so houses on the site will also have to use this access. Traffic volumes will be substantially higher than the figures which the analysis provides for, and the congestion will be very significant. There will, therefore, be a huge additional strain on the already congested mini-roundabout which serves five exits: Coupar Angus Road (both directions), Faraday Street, the existing entrance to the Park as well as the road serving the existing businesses and the proposed development.

The analysis fails to consider that the traffic volumes, for the reasons mentioned below, will be substantially higher than the figures it provides for, and the congestion at Coupar Angus Road and the A923 interchange will be very much more than envisaged. There will be huge economic damage to the commercial businesses in the Leisure Park by fans' cars taking up their parking. Dundee Football Club's Planning Application in principle states that the Ice Arena would be restricted during football matches and for one hour either side. We wish to know how they can claim that, and how they could impose or enforce such a restriction. It ignores the rights of the users of the very popular Ice Arena.

1.2 **Myrekirk Road roundabout.** All football fans wishing to use the dedicated car park at the stadium must pass through Myrekirk signalised roundabout on the Kingsway. They will arrive from the east and make 180-degree loops around the junction; from the south via South Road and (South) Myrekirk Road; from the West (travelling fans), and from the North via (North)



Myrekirk Road, Gourdie Brae and the A923. We have severe reservations about the ability of the roundabout to handle a large injection of football traffic and in particular those seeking to make a 180 degree turn around this roundabout. Should Systra's forecasts prove to be unduly optimistic, Transport Scotland will be left facing an intractable problem.

- 1.3 **Entry to car park from Kingsway.** We do not consider that the proposed eastbound entry into the new football ground from the Kingsway will be safe. Parking for over 300 cars within the stadium site will be subject to prior booking, and there will be substantial additional parking for club guests, officials, apartment residents and hotel guests all via this same entry point. The club's intention is to scrutinise parking permits before a mini-roundabout just south of the new stadium. By our measure, this would only allow a queue of about 11 or 12 cars, at most, on the entry road before the back of the queue presents a collision risk to eastbound traffic decelerating from the Kingsway. At busy times, shortly before a match, cars may well be backed up on Kingsway, waiting for access. The football club says it will ensure this would not happen, but we doubt they could do that. It would just take a few delays at the permit check point (*mislaid pass, argumentative driver without a pass, car breakdown, minor collision*) and the queue would quickly extend well onto the A90 with no means of controlling it; and it would be on the inside of a fast 50mph bend.
- 1.4 **Exit from that car park after games.** Equally we feel that the proposed eastbound exit, typically at around 5.00 pm on a Saturday, will prove hazardous to both A90 and local traffic for the following reasons:
- 1.4.1 Traffic leaving the south stadium exit and wishing to go to the City Centre will go up the off-ramp to gain Coupar Angus Road interchange, where it will queue in the right-hand lane to either make a 90 degree turn to the south towards central Dundee, or a 180-degree turn to go west, back down Kingsway to Myrekirk junction. At the top of the off-ramp from the stadium car park this traffic will face busy A923 outbound (northwards) general city traffic which often queues back across the flyover, and which will have priority; and also the hundreds of extra fans' cars mentioned at 1.1 above exiting the other parking areas nearby. An on-site survey carried out at 17.00 on 2<sup>nd</sup> March 2024, the time when the new stadium would be emptying, counted 87 non-football related cars going northbound across the Coupar Angus Road flyover in a space of 5 minutes, a rate equivalent to more than 1000 vehicles per hour. These would greatly hamper access from the eastbound off-ramp to the flyover. Not only that, but there will be two new pedestrian crossings needed (and anticipated by the Systra analysis) for the large volume of fans expected to park in Dunsinane Industrial Estate and walk across this flyover, as well as some arriving on foot. We fear very long queues back down the eastbound off-ramp.
- 1.4.2 At the same time, some traffic leaving the football ground car park off-ramp will be trying to slip right to join the eastbound A90, at exactly the same point as traffic on the A90 is seeking to slip left to get to the A923 flyover. This combination of congestion, unpredictable queuing, and traffic slip movements crossing each other, seems to be dangerous in the extreme.



- 1.5 **Off-site parking.** We have serious reservations about the practicality of much of the off-site industrial estate car parking proposed by Systra. Much of it is to the south of Kingsway, and so far away from the stadium that fans will have a huge incentive to search for closer parking opportunities; this will exacerbate the congestion, unpredictable driver behaviour, and illegal parking. On match days, there will be uncontrolled parking in the residential Dryburgh estate, causing congestion and inconvenience for existing residents. Part-time “no parking” regulations will restrict the rights of residents and, in the unlikely event that they could be suitably enforced, will merely shift the problem elsewhere. The access by way of the tunnel under Kingsway is cramped, dingy, dirty and singularly uninviting. It is unlikely to be upgraded.
- 1.6 **Environmental concerns.** An important issue, which is very relevant for the Scottish Government’s policy to achieve net zero carbon, is that the Dundee Football Club Stadium proposal runs directly contrary to policies to reduce car use, to increase active travel, and to use public transport. Dundee’s two current football stadiums lie almost adjacent to each other, on the same street in the inner city, and in a wedge between major radial roads. Traffic control is well organised. There is no off-street parking provided, but almost the entire city radial and cross-centre bus network passes close to both grounds and serves every major city residential area – plus Monifieth in Angus, and Dundee Railway Station - all by normal scheduled bus services which amount to around 50 buses per hour in total. It is easy to walk or take public transport to the present grounds from a wider area of the City, and many fans do this at present.

In contrast, the area around Dundee Football Club’s proposed Camperdown Stadium offers extensive off-street car parking, and the currently available public transport to that site amounts to eight buses per hour, only realistically serving the city centre and one housing estate. Reaching the stadium by walking considerable distances is unlikely to be popular, so the increased car use will be substantial. Permitting this development would be very bad for carbon reduction as well as generating a large and unnecessary increase in traffic congestion.

**We invite the City Council to consider all of these issues, and would urge a complete review of the traffic projections, to take account of the mass parking available at Camperdown Leisure Park. We would also caution that, in dealing with football fans, there are a lot of random variables, so traffic projections need a considerable safety margin.**



## **Response to planning application 24/00096/PPPM for football stadium and other works**

### **2. Planning Supporting Statement, the Town Centre First analysis, the Economic Analysis by EKOS, and the financial appraisal by Rydens, as well as aspects of the Master Plan.**

#### **2.1 Residential development**

**Housing:** Dundee Civic Trust considers that the proposed residential development is inappropriate on this site. The applicants make it clear that this is a key enabling use to help fund the stadium and related football activities [Para 3.2.4 of the Planning Supporting Statement]. The use is contrary to the Local Development Plan [LDP] Policy 7 zoning for Leisure and Recreation, and the Trust does not believe that its role in funding the stadium is a sufficiently material consideration to justify such an inappropriate use here. We explain below why, apart from the zoning considerations, the proposed residential development is unsuitable.

The 2023 Dundee Housing Land Audit demonstrates that there are sufficient allocated housing sites within the city until at least 2033. The Audit acknowledges that “windfall” brownfield sites could be welcome in certain sites, but the poor location and nature of this development suggests this site is not worthy of such consideration.

The development will result in a poor environment for occupiers, with a substandard access off Dayton Drive: this is a service road to the Dundee Ice Arena and the multi-screen cinema, and will become one of the main access roads to the new stadium complex. The eastern part of the housing will overlook the section of Dayton Drive designated as the pick-up zone for away supporters’ coaches which will be noisy and congested on match days. These eastern houses will also look on to the back service yards of the cinema and ice rink. The greatest part of the buildings’ views to the south, however, will be of the five storey block of flats. The indicative layout of the housing is poor, in that it shows straight rows of houses with no variation to create interesting spaces or any sense of place, with the road layout dominant rather than subservient to the housing. There is no suggestion that any social housing will be provided. [Our comments on 3. Design and Access Statement]. Neither the flats nor the nearby housing development appear to have any outdoor amenity space. The fact that the flats are intended to be occupied by players and visitors to the football club does not excuse the poor environment and aspect.

The applicants claim that the proposed mix of uses means that the residents will have the services required for a 20-minute neighbourhood development. A 250sqm shop/local convenience store, seven restaurants, two bars (one of which is a “brew hall”), a gym, a promise of a possible medical facility, a cinema, hotel, sports arenas and a crematorium do not constitute a 20-minute neighbourhood. The limited number of residents that would be expected to live within the whole development area is not sufficiently large for new services to be provided by private entrepreneurs. No safe pedestrian access, no school, no dedicated



community hall, no place of worship, no pharmacy is proposed: these are the facilities which are essential for a 20-minute neighbourhood to have any true meaning. [See also our comments on the Design and Access Statement NPF4 Policy 15.]

On football match days, on concert and festival days, and from our observations on ice hockey match days too, the residents will have significant delays and problems entering and exiting via Coupar Angus Road due to severe congestion over extended periods. [See comments on traffic and transport issues.] The severe congestion will also seriously affect the residents of Muirhead and Birkhill, most of whom use this route to and from Dundee.

## 2.2 Other enabling uses

We have analysed why the residential development is unsuitable. In fact, many of the facilities which are proposed are detrimental to the existence of a successful and cohesive residential development. For example:

**Hotel:** The application states that *“The proposed hotel, residential element and crematorium will assist in the cross financing of the proposed new stadium for Dundee FC, training facilities and associated accommodation in the form of apartments for players and visitors”* [para 3.2.4 of the Planning Supporting Statement].

The location of a hotel here is in contravention of LDP Policy 8, which states for good and practical reasons that new hotels should be located only in Dundee city centre or central Broughty Ferry. The location at Camperdown, near the edge of the city, would only be used by visitors travelling by car, whereas locations in the city centre and central Broughty Ferry are easily accessible by public transport in line with National Policy Framework 4 [NPF4] policies. We note that there is an analysis of demand for hotel bed spaces. We believe that the optimism driving these figures depends on Dundee managing to capture much more of the city breaks tourism market than it does now, by encouraging many more visitors to stay for a few nights in the city.

**Crematorium:** Dundee Civic Trust regards the crematorium as a totally unsuitable use for this site. We do not consider the location at the back end of a football stadium car park, next to the inevitably noisy Kingsway to be a suitable site for this use. The commemorative garden at the back of the building will be a particularly noisy place especially as HGVs on the Kingsway are climbing up the hill from the Myrekirk junction. A crematorium should be a place of quiet dignity, for reflection, and we do not believe any ameliorative measures in terms of noise reduction could possibly be effective here. Given that a new crematorium is also planned just outside the city boundary at Duntrune, we doubt that there is sufficient demand for a viable business to be established here. We note from the Master Plan that there is no provision for hearses, funeral cars and mourners to assemble at the entrance to the Crematorium, but only more car parking spaces right along the frontage. This shows little grasp of how a Crematorium functions.





## 2.3 Town Centre First Policy and reports by EKOS and Rydens

**Commercial development:** We welcome the fact that the amount of undefined commercial development of 7000sqm or more as included in the PAN proposals has been substantially reduced in this in-principle application and the uses more clearly defined. We do, however, challenge the conclusion of the Avison Young report that there will be “*no significant adverse effect on the vitality and viability on any of the existing centres*”, particularly Lochee. Lochee High Street and the nearby Stack Retail Park are clearly struggling whatever the consultants say. It does not seem credible that the three new restaurants and the bars will not affect nearby centres as well as the four restaurants already on the Camperdown Leisure Park (the latter especially on non-football match days). Neither can the proposed shop be viable if it relies for most of the time on trade from just 180 houses and flats, so it must therefore seek custom from elsewhere. These comments apply equally to the proposed hotel: if Dundee does not successfully develop the city breaks market, trade will be displaced from other hotels. There is only so much income in the city and introducing new out-of -centre uses must impact on existing centres.

There are a considerable number of bar and food outlets in the vicinity of Dens Park, such as Stobswell, the Hilltown and Clepington Road, and these will lose trade on the 20 or so days a season when Dundee FC play football at home. It is not apparent that any account has been taken of this in the analysis.

## 2.4 The EKOS analysis

This analysis is based on the assumption of a 10% increase in attendance at Dundee FC matches as a result of moving to the new stadium. This may be a credible assumption in the first two or three years of the new stadium opening, but thereafter surely the attendance will depend largely on the performance of the team. Many will hope to see Dundee FC being successful on the pitch, but fans, in particular, know that this cannot be guaranteed. The experience of St Johnstone FC may be a case in point: a year after the Club’s new ground opened in 1989, the average attendance at matches was 7601. In 14 matches in 2023/24 the average has fallen to 4607.

We are also concerned that the building of an ice rink extension, apparently for curling, may have unforeseen consequences. The Trust has no objection to such a development itself, but we know that the Dundee Ice Arena operates at a deficit; and running another facility, particularly for curling, will only worsen its poor financial situation. Given this would be likely to happen, the Trust would be concerned that the Council, or whoever will own this new rink, may be tempted to sell or lease this important asset to a commercial operator such as a supermarket. We therefore suggest that if the Council were to be minded to approve this application, a condition be imposed that this building could only be used for leisure related uses in line with the LDP zoning.

Our conclusion is there will be significant displacement of trade as a result of these proposals and therefore some threat to jobs elsewhere. We suggest that the economic benefits predicted by EKOS and Rydens will be less than forecast. In particular, the prediction, made





by EKOS, of 185 net ongoing FTE jobs to be created in the city by the whole development is overly-optimistic.

## 2.5 **Alternative sites**

The application examines a number of alternative sites which were considered by the developers before choosing the site at Camperdown. They also consider the “do nothing option” and an “appraisal of constraints” if Dundee FC chose to remain at Dens Park. The Trust understands these constraints, but we believe it is not plausible to suggest that Dens Park could not be upgraded by refurbishment of the stands, which would provide a better spectator experience and better corporate hospitality facilities, albeit on a more modest scale than is envisaged at Camperdown. The ground has a fine example of the stand designed in 1921 by renowned Scottish stadium architect Archibald Leitch, though it is in a poor condition. Also, NPF4 advocates the preservation of existing buildings to reduce carbon emissions resulting from demolition. We also make the case for upgrading Dens Park in our response to the Design and Access Statement. We appreciate that some enabling finance would be required to make this happen, but it would be a small fraction of the enabling finance needed for a complete new stadium.

An alternative which would allow Dundee FC to remain in the vicinity is ground sharing with Dundee United FC. If this was to happen, using Tannadice Park could well be a viable financial alternative. Tannadice, just 200 yards from Dens Park, has been upgraded over time, albeit in an *ad hoc* fashion, with a capacity of over 14,000, and this could be increased by developing the Shed End to provide a two tier stand similar to the Arklay Street End. The increased capacity would provide extra revenue in particular at derby games and when the old firm are playing the Dundee clubs - potentially at least six times a year. Ground sharing has been proved to work elsewhere, in particular in Italy, where top clubs share grounds in Genoa, Rome and Milan.

By vacating Dens Park, Dundee FC would gain the enabling finance to establish their own facilities and presence at Tannadice: funds would be generated through Dens Park being made available for housing development on brownfield land within a 20-minute neighbourhood. Sharing would save on running and maintenance costs without the need for massive capital expenditure on projects at Camperdown which have only marginal – or no – relevance to a football stadium.

We understand that no discussions have taken place between the clubs and we would urge Dundee City Council in response to this application to initiate such discussions which could secure the future of top class football in the city, without the negative consequences of one club moving to Camperdown. This solution would be disliked by some, but it would allow the two clubs to maintain their separate identities, would help to secure the future of both teams by greatly reducing their overhead costs for the provision of a stadium and the associated ground staff, and would help to secure the future of both teams for the longer term. We recognise, too, that such an arrangement would require agreement by the Scottish football authorities. The separate transport and traffic analysis which the Trust has set out above argues that both existing grounds are easily accessible by various forms of public transport,



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are potentially walkable from the city centre and the bus and railway stations, and have a well-established crowd and car parking management scheme which operates well. Because of its location in the more densely populated inner city many more fans walk to the ground than is likely to happen at the proposed new stadium. This solution would substantially reduce the need to travel by car to the ground, and would thus support the NPF4 policies to reduce carbon emissions.



## Response to planning application 24/00096/PPPM for football stadium and other works

### 3. Design and Access Statement

The following comments and objections relate directly to relevant sections of the Design and Access Statement which supports the application, in relation to Dundee Local Development Plan 2019 (DLDP2019) policies and the National Planning Framework 4 for Scotland (NPF4), which is regarded as superseding the DLDP2019 policies.

#### 3.1 Environmental Designations and Context

**Land Use:** The Camperdown Park Development Plan 2012-17 Report Section 8.4, states that *“the potential exists for a continuous visitor experience - embracing both outdoor and indoor activities - stretching all the way from the Wildlife Centre to the west through to the cinema and restaurants to the east”*. This report also recommends development of the existing old natural horse field in the park and the old NCR site *“... encouraging visitor movement between the two attractions in order to increase choice, length of stay and economic impact”* in relation to the Camperdown Leisure Complex and Camperdown Park. There is no mention anywhere in this Report of artificial playing fields, a stadium, housing or a crematorium being suitable for encouraging such visitor movement. Much smaller interventions are suggested instead in the Report, so the assertion that the Report is a *“material consideration”* is irrelevant, considering that very major interventions are now proposed.

Furthermore, the development will occupy a significant portion of Camperdown Park. This should not be allowed to proceed as the Park is sacrosanct to the people of Dundee. The ownership and management of Camperdown Estate and Belmont Estate is clearly set out in the City of Dundee District Council Order Confirmation Act of 1990 which states in Clause 9: *“That part of Camperdown Estate which is known as Camperdown Park... shall be held and maintained by the Council as a public park and a place for public resort.”* and in 12.2: *“If the Council dispose of any part of the Camperdown Estate, the proceeds... shall be applied towards capital expenditure in connection with Camperdown estate including the improvement of Camperdown estate....”*. There is an existing Core Footpath/ Right of Way in the Public Open Space of the horse field, and this should be preferred to any creation of relatively private sports fields to the west, and not be diverted elsewhere. It is a primary route from Dryburgh to the Park. The horse field should be preserved for full public access, as a contiguous part of the park. In any event, we believe that the Council would be obliged to make significant amendments to this Act by means of another Act in order to alter the Council’s powers, amend its terms of reference before this development could proceed. Unlike most private legislation, it is inevitable that the introduction of such a Bill would be opposed.

The Estate Boundary Wall leading to the eastern boundary of the proposed football pitches is Category A listed and defines the extent of the Camperdown Park Estate; no part of it should be removed.



## 3.2 Planning Context

### 3.2.1 National Planning Framework 4 for Scotland Principles:

**Policy 4:** states: “Development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported.” The application for permission in principle does not meet these standards in most respects. [See responses below under 3.3 LDP2019].

NPF4 requires a “just transition... leaving no one behind”. People should be empowered to shape their place, but the application ignores this as previous local objections from the PAN have been ignored.

NPF4 allows “Compact urban growth”, but this development does not limit urban expansion when it intrudes into Camperdown Park and adds important new facilities to the north of Kingsway.

### 3.2.2 Local Development Plan 2019:

**3.2.2.1 Policy 7:** Tourism and Leisure developments: This states that proposals for major leisure uses should be accepted only where they do not prejudice the viability of a City Centre or District Centres, and are readily accessible by all modes of transport other than car. This is clearly not the case in the current application because the traffic management proposals have fundamental flaws and do not work.

**3.2.2.2 Policy 10:** There is no housing allocation in the LDP 2019 for housing on this site, and the existing greenfield space to the north of the old NCR recreation buildings should not be used for a large scale housing development.

**3.2.2.3 Policy 23:** Lochee District Centre will be impacted by any new businesses opening in this development, and the proposed development threatens the viability of that Centre and of the establishments in Albert and Dura Streets, in the vicinity of the existing stadium.

**3.2.2.4 Policy 28:** There should be genuine open space and green networks. The artificial training pitches will not be open to the public at all times, so they cannot be considered to offer the same open space amenity as Camperdown Park itself. Policy 28 indicates that green infrastructure should not be fragmented. The provision of artificial all-weather training pitches completely disrupts the natural habitat of the part of the site within Camperdown Park. It destroys existing natural flora and fauna where it exists. The proposed green infrastructure does not compensate for the loss of publicly accessible land by denying the natural capital and access which exists on this site, and which has done for decades. The proposals affect a significant part of the site, we would say adversely, and the suggested improved amenity value on the rest of the site is severely limited, given the enormous increase in traffic pollution, noise and congestion that will be produced by the proposed development. These negative consequences will also affect several locally important nature conservation sites in



Camperdown Park and the Downfield Golf Course. Thus, the proposal contravenes *Policy 39* – Environmental Protection, and *Policy 40*: Air Quality.

**3.2.2.5 Policy 35: Trees and Woodland:** New developments should ensure the survival of woodland, hedgerow and healthy mature trees. The application states that forty mature and healthy trees (which are grade B listed) will be removed. In the Environmental Impact Assessments documents related to landscape mitigation measures [shown in section 6.3.2], it states only that any removed trees “will be replaced”. This is not nearly good enough: in order to mitigate the lost carbon storage in the existing trees, six trees should replace each tree lost, given that it will take each new tree standard ten to fifteen years to reach similar maturity, and that up to 40% of new trees planted die within the first two years of planting. This will entail the provision of a minimum of 240 new tree standards on the development. We do not see this many tree replacements on the Indicative Landscaping Plan [section 6.3.2]. We infer that if forty trees will be removed, forty will be replaced. It is essential that there is even more additional tree planting which will mitigate some of the additional carbon emissions created by the proposed development, particularly along the western boundary of the proposed playing fields.

**3.2.2.6 Policy 39:** Environmental Protection – against noise, vibration, emissions to air, dust, or light pollution: Clearly the development will not be able to alleviate this, as we have established that the much increased traffic flows will not be able to circulate properly.

**3.2.2.7 Policy 40:** Air Quality: There is a general presumption in Policy 40 against development proposals which might significantly increase air pollution. The mitigation measures will not work because there will be very many more cars introduced to the area. For much of the time these cars will be stationary in queues, due to the inadequate road layout.

**3.2.2.8 Policy 53:** Gardens and Designed Landscapes should be protected: The amenity of the existing Camperdown Park will not be protected by this development, as it will lose its natural landscape to artificial playing pitches.

**3.2.2.9 Policy 54:** Safe and Sustainable Transport: The area of the proposed development is not well served by local bus services and is too far from the station to walk to. Large scale car use will be essential, so the development will not minimise the need to travel by car. It has a detrimental effect on the existing road network. The proposed Travel Plan does not mitigate the negative transport impacts.

### 3.2.3 **NPF4 Policy 15:**

**Essential Accessible Amenities:** The accepted concept of a 20-minute neighbourhood means a 10 minute walk each way to the facilities. The siting for the proposed 180 new housing units does not satisfy this NPF4 requirement. A small M&S store is about 40 minutes’ walk/wheelchair on paved surfaces (Google Maps), not 12 minutes; and it is not designed for pedestrian access because it is inside a petrol



station. A dental surgery is a 16-minute walk through Camperdown Park, or 22 minutes on pavements, the pharmacy is 22 minutes' walk and the school is 19 minutes' walk. It seems the proposal will incorporate a new food shop, dentist and GP, but no community hall, school, place of worship, or vital pharmacy. There is no indication how a professional dentist or GP will be persuaded to come to a site such as this. There is no sign of housing diversity such as the provision of any social housing on the site, or ability to age-in-place, as the adaptability of the homes will meet only the Silver Standard, not the Gold Standard as contained in the Scottish Building Regulations.

### 3.3 Background to Project Appraisals and Design Process

3.3.1 **“Do Nothing” Option and 5.6 Implication of Stand Conditions [5.5]:** There is only discussion in the application of “do nothing” or “upgrading” the stadium. There is no mention of rebuilding it on the existing site, while possibly sharing a ground with Dundee United for the duration of the rebuild. The current site is far more amenable to active travel and sustainable travel choices than the proposed one, particularly now that there is a new DCC Traffic Management Scheme in place since August 2023.

“Other activities” could include using the substantial undercroft to the rebuilt Dens Park stadium for other businesses to rent, which would help Dundee FC to pay back the cost of the new stadium. This has been discounted. Why? The developer could choose another brownfield site to develop housing to cross subsidise the stadium redevelopment. We recommend that the planning officials ask the developer to reconsider what could be rebuilt on the existing site, using a more imaginative and profitable approach to appropriate mixed use. Elsewhere in our response we have referred to the option of sharing Tannadice Park with Dundee United FC as an affordable solution to upgrading football facilities for the city.

3.3.2 **Location of New Site and Access Provision:** The justification for the new site being “separated from the nearest existing residential area” is contradicted by the fact that it is proposed to build new housing right next door to the stadium! There is no “excellent accessibility” to the site as claimed here; see our submission on transport issues, where we explain that access will at times be severely restricted.

### 3.4 Indicative Masterplan Proposals

#### 3.4.1 NPF4 Policy Annex D: Six Qualities of Successful Places

3.4.1.1 **Healthy:** We refute the claim that this development will be healthy overall, on account of the traffic jams which will be caused in the immediate and surrounding areas by the excessive road traffic. Inevitably, this leads to additional congestion, noise and environmental pollution. We also believe that the external noise caused by external stadium activity will also be unhealthy for those attending the crematorium, residents living in the new housing, and visitors wishing to enjoy a peaceful time in Camperdown Park.





**3.4.1.2 Pleasant:** We do not believe that the addition of a new stadium will be pleasant for the area: it certainly does not comply with the requirements to meet this “quality”. It will not support natural environments, as it will be building over natural green space with artificial football pitches and hard landscaping most of the current NCR site. The proposed development site was previously brownfield only in a nominal sense, because it was the recreation grounds of the NCR factory, with grass and trees and some supporting small buildings. The juxtaposition of the new buildings is extremely unpleasant and inappropriate, with a crematorium and new housing each having to contend with a noisy, very busy football stadium, a pub, restaurant and hotel on their doorsteps. We cannot understand how tranquillity or quiet dignity will be found at a crematorium site which is immediately adjacent to a football stadium. The two purposes are completely at odds with each other.

**3.4.1.3 Connected:** The site is poorly served by public transport compared to the existing stadium. It is not walkable from the rail station and has only two bus routes serving it from the city centre. It will not reduce car dependency, but will significantly increase it for accessing the stadium. The Indicative Masterplan Layout (Section 6.2.4) shows 500 car park spaces for the stadium. There are just eight bays shown for the expected 60 coaches, which means that at peak times up to 54 or so coaches [maximum, quoted by Systra] will have to find somewhere else to park. The housing development for 180 homes, on the modest assumption at least two car parking spaces for each home (there being very limited public transport provision) will entail an additional 360 or more cars using the site. It will be impossible for all of these 360 cars to have easy access to their homes when they will have to cope with 60 coaches, and the hundreds of cars wishing to get to the Ice rink and cinema car park, many of them attending matches, and every single one using the same small roundabout.

Pedestrian access is very poorly planned. The coach bays should be on the south side of the road to allow supporters to reach the stadium without having to cross the main entrance route. As it is proposed, there will be a serious conflict between the coach loads of away supporters crossing over the entrance road, and buses, taxis and residents getting into the site.

Pedestrian and cycle access to the stadium from the city will be on four main routes, namely from Dunsinane and Lochee via the A923 flyover; from Faraday Street via the Coupar Angus Road mini roundabout, from Wester Gourdie via Liff Road, and the Kingsway footpath and from the South via the small underpass under Kingsway, near the south east corner of the proposed playing fields. It is too narrow to cope with a large volume of football crowds and will need constant monitoring. The other option for pedestrians arriving is the main flyover / roundabout above the Kingsway leading to the site, which has no pedestrian-orientated traffic light system at present. The required new pedestrian light system, when coupled with a substantial increase in vehicular traffic, will lead to even more pedestrians obstructing the flow of traffic.



**3.4.1.4 Distinctive - 6.2.6 Urban Form and Mix of Use and 6.2.7 Architectural Vision:**

The stadium may have been designed by renowned stadium designers, but the urban form is distinctly underwhelming, being set far back on the site, and presenting as it will a low-cut frontage to the south that will be barely visible from the Kingsway. It is certainly not a “landmark” building. A more formal massing to the south would give the building more stature as a “landmark building” on Dundee’s ambassadorial Kingsway route. The crematorium, however, looks more promising as a feature building. The relationship between the stadium (17.5m in height) and hotel (27m) is uncomfortable, and will cause a dark canyon through which the wind will accelerate due to the Venturi effect.

*Residential Development Aspiration:* it is good to see the aspirational images here which are taken from the “Abode” development in Cambridge. However, the layout shown will look nothing like these images. The proposed layout is the same old boring “race track” road system with little shared paving and no sense of placemaking. There is no indication whatsoever of a pedestrian path network being separated from the road network in the Masterplan layout, as all the houses will, unimaginatively, lead directly off the roads. There are very few terraces, unlike the Abode development. It’s another example of “itty bitty little boxes” all over again. The disconnect between Masterplan reality and residential aspiration is simply enormous. In any case, this greenfield area in the Council’s Housing Audit document shows that there is no housing provision indicated for here.

**3.4.1.5 Sustainable: Indicative Site Levels:** There is a significant drop in level across the site from North to South. The proposed retaining wall in front of the housing will lead to significant earth having to be removed from the site unnecessarily as no cut and fill solution is proposed. This unnecessarily increases the embodied carbon emissions created by the need to move huge volumes of earth and sub-soil. Indeed, the SUDS solution will require yet more earth to be removed from the site, all causing significant transport pollution and carbon emissions.

*Indicative Landscaping Plan* – The proposed SUDS ponds are serving only the training ground. We see no proposals for SUDS serving the new housing development and football stadium areas. This blue/green infrastructure takes up considerable space alongside other hard infrastructure, and is not accounted for at present. There does not appear to be enough space to accommodate it on the proposed Masterplan. There should at least be SUDS ponds and swales shown immediately to the south of the car parking and immediately south of the housing too, to cope with flash flooding of the new hard surface areas. Otherwise, most of the surface water on the hard landscaped areas will have to connect into the culverted Lochee Burn. This ancient burn should be protected and not overburdened, particularly as flooding is increasing exponentially in Scotland, well beyond the SEPA “once in two hundred years” predictions which are cited in the proposal documents on flooding. The SEPA figures are in constant need of revision, due to climate change increasing beyond expectations.



*Net Zero Design Principles:* Net zero does not mean “minimising” – it means creating an actual Net Zero balance sheet strategy for carbon emissions. There is no balance sheet here, and none appears to be intended. The exploration of waste heat capture from cooling the ice rink is welcome, but in the summer, the opposite will be needed, as both buildings will need a lot of cooling. We are pleased to see solar panels being provided on the South facing roofs of the stadiums, but these should be on every south facing roof in the development where they are not overshadowed. There is no statement about using carbon sequestering materials such as timber, only a vague statement referring to the aim to “*minimise embodied carbon*”, with no target figures or standards quoted or referred to. Stadium seating should be 100% re-usable, not recyclable. Recycling uses more energy and creates more carbon emissions. Re-use should come first. Artificial “living” green walls should be avoided, as most of them die within a few years unless they have an extraordinary amount of maintenance. Natural plants such as ivy should grow up naturally from the ground which is far less embodied carbon intensive.

**3.4.1.6 Adaptable:** It is unclear how the housing is genuinely adaptable as it aims to meet only the Silver Standard, rather than Gold, as contained in the Scottish Building Regulations. It will be impossible to adapt the crematorium or the restaurants to other uses, and this is not adaptable. Neither is it clear that the hotel is being designed for possible conversion to housing.



## Response to planning application 24/00096/PPPM for football stadium and other works

### 4. Energy and Sustainability Statement

The principles and policies in Dundee City Council's Sustainability Plan and targets are not addressed in this application.

- 4.1 **Use of renewable energy.** In the application, a “fabric first” approach is adopted for the buildings, which is to be welcomed. However, it is stated that Air Source Heat Pumps “shall” meet thermal energy demands, but that solar panels “could [our emphasis] be located on the roof”. This is clearly insufficient as an undertaking for the provision of renewable energy. There is a good exploration of renewable energy options, including solar thermal, heat pumps, PV Panels, deep geothermal, waste heat recovery and battery storage. Of these, solar PV energy is the most cost-effective renewable energy to produce at the moment, and this efficient means of producing energy should be mandated for the roofs of all the buildings, where feasible. Under the policies espoused in National Planning Framework 4, new developments shall be required to maximise the opportunities for on-site low carbon and renewable generation.
- 4.2 **District Heating.** The statement on district heating shows that when new district heating scheme is looked at purely for the non-domestic buildings (4.8MWh per annum), it easily complies with a linear heat density of 4 MWh/km, making it viable and indeed desirable, given the waste heat from the ice rink. It is good to see that the developer is considering this.
- 4.3 **Passivhaus Standards.** Passivhaus equivalent standard should adopted for all buildings in this development, rather than adopting the current Buildings Standard Scotland 2023, which will in early course be superseded in favour of more ambitious targets; these will be mandated by the Scottish Government as a Passivhaus equivalent standard for new buildings. Alternatively, the development should aim for Platinum standard of 100% reduction of carbon emissions in use, rather than the lower Silver standard which is proposed by the developers. The levels of airtightness (5m<sup>3</sup>/m<sup>2</sup>/hr @50pa) and insulation are substandard and will not help to achieve a net zero design. The level of window and door insulation is also very poor. The mechanical extract fans should be specified in order to obtain maximum heat recovery for all buildings and not just the non-domestic buildings.
- 4.4 **Ventilation.** We are pleased to see consideration being given to problems of overheating, but consideration should also be given to dealing with exceptional cooling events that will increasingly occur due to excessive wind speed and exceptionally low temperature; this is now occurring more frequently in Scotland due to climate change. It is good to see natural ventilation provided “throughout the development” – it must be ensured that every room in each dwelling can be naturally ventilated, in case of mechanical ventilation breakdown or power cuts. We are pleased that CO<sub>2</sub> monitors will be installed, but it would be even better to see temperature and humidity monitors installed as well.



- 4.5 **Evaluation.** The developers should commit to a full Post-Occupancy Evaluation, carried out after one year, in line with BS40101 Building Performance Evaluation standards.
- 4.6 **Water use.** The specification of low volume water sanitary fittings is to be commended, but there should also be provision of rainwater butts for those dwellings with gardens, and there should also be an arrangement for the storage and use of rainwater for use in non-domestic buildings and grounds.
- 4.7 **Disassembly.** In the optimising of performance, flexibility, adaptability, wellbeing and security, material use and waste, the developers are planning for the Silver standard when they should aim for Gold as the highest standard which is most appropriate in the longer term. Under NPF4, Policy 12, the development should be designed, at the end of its life, for the disassembly and re-use of components, in order to create a low carbon circular economy. There is no sign of such a plan to design for disassembly. This should be done using Building Material Passports software to record all products used on site. Re-use is to be preferred to recycling in the Waste Hierarchy.
- 4.8 **Materials.** Local, sustainable materials, according to the developers, will be specified to be used, and this is to be commended. However, there is no evidence of compliance with any embodied carbon targets such as specified by the RIBA embodied carbon targets. Maximum embodied carbon targets will soon be legislated for, and the development should anticipate this forthcoming change.

**Our submission illustrates that the proposals, taken as a whole, are unacceptable for the reasons documented here, and in particular, they are unacceptable in the context of:**

- **the planning requirements of NPF4 and LDP2,**
- **traffic safety and congestion,**
- **the unsuitable siting of the hotel, crematorium and residential development,**
- **the unambitious plans for renewable and sustainable energy, and**
- **the use of part of Camperdown Park.**

**The planning application should be refused.**

Dundee Civic Trust SCIO  
18 March 2024