

NEWSFLASH



Dundee Civic Trust
encouraging the best

Wee Forests in Dundee

Kevin Frediani

Green spaces and mental health

Green and blue spaces are well suited to filling urban voids. There is extensive evidence that in urban areas, when people have parks, gardens, and greenery near their homes, they gain mental and physical health benefits. As a result of this evidence, there are a number of health care initiatives which are designed to motivate people to spend time in local green spaces. These include the Dundee Green Health Partnership, an early Scottish and very local example that launched in April 2019. This is a cross-institution initiative, initially led by Dundee City Council's Greenspace Team and co-managed by the NHS Tayside Public Health, that is now being taken forward by Dundee Volunteer and Voluntary Action, demonstrating how collaboration in Dundee's green spaces is being facilitated by a community of interest and practice that is willing to actively engage with and to support health care professionals. This is mirrored in the community food growing and urban nature regeneration realms across the city, where communities are involved in growing people and growing places. The Dundee Wee Forests project is part of this network.



Local school children in Maryfield Ward, helping to co-design their community wee forest

Nature experimental learning and habitat diversification

Dundee Wee Forests have been established over two planting years in the Maryfield, Douglas, Lochee and Kirkton areas of the city, with the help of local residents who are engaged with all phases of the site's development, which includes planning, maintaining and monitoring these areas as new community assets. This formative citizen science project is led by the University of Dundee Botanic Garden, whose staff act as facilitators to co-design the new Wee Forest places, alongside local schools, NHS and community partners in four wards of the city. These wards identify as areas of multiple deprivation on the Scottish Index for Multiple Deprivation (SMID) and they have also been identified as lacking diversity in their tree canopy at the landscape level by the Woodland Trust 'Tree equity

score' (Woodland Trust, 2024).

For those unfamiliar with the Wee or Tiny Forests concept, it is based on the restoration work of Japanese forester Akira Miyawaki. Wee Forests are small native woodland plantations, ideal for urban environments, which bring natural elements close to local people in order to address ecological restoration through rapid, small-scale Nature-based Solutions (NbS). With up to 600 trees on a plot the size of a tennis court, in deeply cultivated organically enriched soils, they are claimed to generate high levels of biodiversity, soil health and improved local air quality.



- (1) Seedlings are planted densely, 3 trees/m², and randomly, mixing as many native trees of potential natural vegetation as possible.
- (2) Approximately 3 years after planting, natural selection among the seedlings allows the most adapted ones to develop.
- (3) By 15-20 years after planting, the early model of a dense mature forest will be established.

<https://urban-forests.com/miyawaki-method/>

The approach to the Wee Forest work has been informed by the Scottish Government's climate change and biodiversity ambitions following the coronavirus pandemic and COP 26. The aim is to find nature-based solutions to social and environmental issues in areas with high SMID by improving the local environment and biodiversity, as well as providing a potential resource for learning and play. These forests are now eighteen months to two and a half years old and are being used by the local community in a variety of ways. Recent research has sought to identify how the school and medical practice stakeholders use their Wee Forests and, for those who do not have access to Wee Forests, their Local Green Spaces and Urban Parks. The results are revealing. Although only very recently planted, the forests are already becoming part of a network of community green spaces which serve community amenity, biodiversity, education and networking functions. As the Wee Forests grow, citizen science with local 'tree keepers' will help evidence their progress in delivering anticipated benefits, such as:

- *Beautify the land and make the environment more enjoyable for everyone.*
- *Forests improve air quality*
- *Vegetation decreases noise level and regulates temperature.*
- *Soil is better protected. Erosion and risk of flooding are effectively reduced.*
- *Forests provide great habitat for biodiversity.*
- *Forests store significant amount of CO² that no longer stay in the atmosphere.*

Final thoughts

The University of Dundee Botanic Garden is part of the Tiny Forests international network of living laboratories that is working with over 2000 communities. The network monitors the environmental and social benefits that Wee Forests provide in urban areas, across different geographical areas and demographics. Taking part in Wee Forest citizen science creates an opportunity to build social cohesion, re-connect people to nature, raise environmental awareness and empower positive action. Results will deepen our understanding of how the Miyawaki method allows our Wee Forests to develop rapidly into a multi-layered forest ecosystem. If you would like to learn more and potentially become a forest keeper, then our team would be pleased to hear from you. Contact botanicgardens@dundee.ac.uk for more information or come along on one of our advertised events to help grow people and grow places together.

Kevin is Curator of Botanic Garden and Grounds, University of Dundee.

The Mills Observatory - A 90th Birthday Threat or Treat?

Roderick Stewart

The Mills Observatory should rightfully enjoy the celebration of its 90th anniversary next year, yet it is under a very real threat of closure. Two other Dundee sites (Broughty Castle Museum & Caird Park Golf Course) are also under threat with the aim of saving a total of half a million pounds, of which the Observatory would account for a mere forty thousand pounds, less than 10% of the total.

The closure of the Observatory as an educational tool, encouraging children to become interested science in general, would be an enormous loss to Dundee.



Photo by Craig Doogan

The Mills Observatory on Balgay Hill, Britain's first purpose-built public observatory, was funded by a legacy from John Mills, a Dundee manufacturer and keen amateur astronomer who wanted to make "the wonders of the heavens" available to everyone. Initial plans to build on the Law were overtaken by the Great War and this dramatic hilltop site was subsequently (and most appropriately) taken for Dundee's War Memorial. The shift to Balgay Hill, however, had the fortuitous advantage of being better shielded from what we now call light pollution by its deep fringe of trees, and it also offered easy public access.

The Observatory opened in 1935 with its unusual *papier mâché* dome covering an 18-inch reflecting telescope. This instrument was replaced in the early 1950s by the 10" Cooke refracting telescope from St Andrews University Observatory which still stands under the dome today. In 2013 the present flagship telescope, a 16-inch Dobsonian reflector, was installed and the 'Mills' continues to be a highly popular and distinctive local attraction for astronomers, scientists and, most importantly, the public to visit. Its power to engage children, schools and youth groups to take an interest in science must not be underestimated.

Consultations on the Observatory's future are being run by Dundee City Council in partnership with operators Leisure & Culture Dundee over the next six weeks, with these possibilities:-

- An alternative operator taking on the running of the observatory
- Securing new funding, for example by way of grants or sponsorship, to support maintaining the service by Leisure and Culture Dundee or another organisation
- The closure of the building, with the council continuing to maintain its fabric
- Community asset transfer, with the observatory becoming community owned and run

What You Can Do:

Help turn this threat of closure into a 90th birthday treat by your active participation:-

Complete the online petition at <https://savethemills.dundeeastro.com>

Act on the DCC Consultation & Surveys page at <https://www.dundee.gov.uk/consultations-and-surveys>. The closing date for the consultation is 28 June 2024.

Scaffolding revisited

Stephen Brand

A year ago, I wrote a piece in Newsflash about scaffolding. I thought I would revisit this to see what progress, if any, has taken place.

The new BT office is progressing apace and the scaffolding is now down although there is a lot of work to be done to fit the office out with all the appropriate kit.

The new social housing block at City Quay has been finished and seems to be fully occupied. A further block is being built and as you can see has a fine wrap of scaffolding around it. It was reported recently in the press that this work was being paused for reasons that did not seem clear but hopefully it will be finished soon.

The Customs House scaffolding has now come down but not for good reasons. The developer went out of business and no doubt the scaffolding company wanted to retrieve its equipment. Sadly, no progress is likely in the near future and the building is again showing signs of neglect with broken windows and the inevitable buddleia growing along the roof line.

The Hillcrest/Cater Homes development of social housing in Gellatly Street is progressing with a large crane in position, something we haven't seen in Dundee for a while. Just behind that in Candle Lane, a new block of housing has gone up although it is not yet occupied. However, it is nice to see a small tucked away site being used to bring more people into the town centre.

It is pleasing to see the Seagate housing development with its scaffolding now down after several years. There is still ongoing work so the building is not yet occupied but perhaps soon? As suspected, Chalmers Hall still has its cover of scaffolding and now takes over from the Seagate development as the building with scaffolding up for the longest period.

I hope there will be more progress if I revisit these sites



Stop press - Delight as Eden Dundee approved, but...

We are very pleased that Eden Dundee has achieved full planning permission – probably one of the most significant planning applications ever made in Dundee – and now the real, hard work begins.

But - and it's a big 'but' - we have serious concerns about the quality of the pedestrian access to the site, including Seagate, Dock Street, and Foundry Lane. In one or more ways all are unsuitable in their present state. More about this from us later. Watch this space.

Social housing – an answer to the housing emergency

John Mulloy

With 16 different government ministers since 2010, housing has not been high on the UK government agenda for a long time despite opinion polls repeatedly showing it is a priority concern for the general public. Millennials have the most challenging experience of accessing and affording housing of any generation since WW2. Because of rising homelessness, the increasing costs of home ownership with the average UK house price now £375k, and private sector rents having increased by 7% in 2023, the reality of a housing crisis is now more widely recognised.

In May the Scottish government, following the lead of several councils, declared a national housing emergency to tackle 'one of the defining issues of a generation'. Solving the housing crisis will require a multi-faceted approach addressing failings and problems in all sectors of the housing market: home ownership, private renting, affordable housing, and social housing. This article examines the vital role of social housing and looks at how such provision is being made and planned for in Dundee.

Social housing is 'not for profit', rented housing for people on low incomes or with particular needs and is owned by councils or housing associations. It exists to help people who can't afford to buy or rent on the open market.

Government subsidy is required for social housing in the form of capital grants which councils and housing associations must supplement with commercial loans from banks or financial institutions serviced by rental income. The homes are owned by councils and housing associations and provide an asset which they can use for securing further loans in the future for building new homes or improving existing stock.

Between 1946 and 1980 there were 4.4 million new social homes built, mostly by councils, in the UK during a period referred to as a golden age for housing when low-income households had a secure, affordable, high quality, alternative to home ownership. At its peak in 1981, 51% of households in Scotland lived in social housing. Today that figure has reduced to 24%.

The dramatic decline of social housing was caused by the Thatcher government's introduction of the Right to Buy legislation which allowed tenants to buy their homes at deep discounts. This loss of social housing was further exacerbated by restrictions on councils' ability to continue building new social housing. The Scottish government abolished the Right to Buy in 2014, finally arresting the decline, although the UK government has retained this right in England and Wales.

Until the 1970s, almost all social housing was council owned but the emergence of housing associations after the 1974 Housing Act allowed that voluntary, not for profit, sector to contribute to the provision of additional new social housing. The current 24% of social housing in Scotland



is roughly evenly split between councils and housing associations although associations now make the lion's share of current and planned provision in partnership with councils.



Over the last decade, the Scottish government have proportionally, and even some years numerically, funded more social housing in Scotland than the Westminster government has done in England. Housing policy and practice has increasingly moved in different directions in Scotland from the rest of the UK since devolution.

Details of the recent and planned provision of social housing in Dundee can be found in the annually reviewed and published Strategic Housing Investment Plan which all councils produce and publish in partnership with housing associations. The current plan covers the period 2023-2028 and details specific sites, approved developer, number of homes and tenure to be provided, grant required, estimated start and completion dates. The resource planning assumption is for £89m of Scottish government grant over the period from 2021/22-2025/26. During the current fiscal year, 761 new homes are expected to complete, with 715 of those social rented homes split between 650 for various housing associations and 65 for Dundee City Council. Proposed further projects between 2025-2028 amount to 528 new homes with the vast majority likely to be social housing though some tenure mix is still to be decided.

With greater political acceptance of a housing crisis, there is no doubt that, whichever direction housing policy takes in Scotland, social housing has a vital role to play. Home ownership peaked about 2008 and is simply unaffordable for many people. Private renting is expensive, over-subscribed, lacks security of tenure, and is poorly regulated. As Shelter in Scotland now advertises 'social housing is the answer to the housing emergency'.

Nutan Kumar Subedi

We regret to report the death of longtime supporter of the Trust, Dr Nutan Subedi. Nutan served on the Board of the Trust for many years, including as Chairman from 2012 – 2015. He brought a new perspective to the work of the Trust and gave us valuable insights and knowledge through his expertise as a structural engineer. As with everything else he did, he excelled as chairman of the Trust with his calm demeanour and his ability to involve others.

He was appointed to a lectureship in the Department of Civil Engineering at Dundee University in 1980 and retired as Reader, a promotion gained from excellent research work into the structural behaviour of shear walls in tall reinforced concrete structures as well as earthquake analysis. He published a wealth of papers in his field of research. He was also a respected lecturer and always willing to help his students. Nutan had a wide range of interests and brought to the attention of Dundee citizens the research he carried out on the work of the great City Architect and Engineer James Thomson and his plans for the City.



We send our sincere condolences to Andrea and their daughters Julia and Caroline.

The health of our high street Barbara Illsley



In June 2023, The Courier launched a project to track vacancy rates in Dundee's shopping streets and this was followed up by a survey seeking people's views of the city centre. The Courier High Street Summit, held on 2 May this year, was an opportunity for those with an interest in regeneration to discuss the issues facing Dundee city centre and ideas for the future.

Courier reporter Lesley-Anne Kelly presented the research results. Shop vacancy rates vary from Union Street at 7.7 % to Commercial Street at 33.3 %. Approximately half of respondents travelled to the city centre by car with many favouring additional and/or free car parking. Most people would welcome a greater variety of shops. Depressing, dirty, rundown, empty, and sad were the most frequently used words to describe the city centre.

Matt Colledge, Director of IntoPlaces, an organisation that supports high street regeneration, gave a stimulating presentation into the regeneration of the centres of Altrincham and Stockton. He highlighted the 4Rs of Renewal: Reposition (knowing your place with data to inform a vision for change); Reinvent (activate and animate the town by diversifying its attractions); Rebrand (establish a unique brand and identity to engender pride); Restructure (using place partnerships to deliver action).

Acknowledging problems was the key starting point in turning around the centres of Altrincham and Stockton but Matt suggested that it was equally important to focus on the positive features and what could be done. Engaging key individuals and the wider community in forming a vision was vital. Altrincham developed a new vision as a 'Charter Market', a market for leisure and services as well as independent retailing. Investment was made in the public realm, vacant buildings were brought back into use as health hubs and arts venues. He stressed that just one or two strategic developments can change people's perceptions of a place. In Stockton, a dated shopping centre was bought by the council, demolished and a new city park developed on the site. Working collaboratively with the private sector and others is needed.

A panel discussion followed with questions and points from the audience:

- Increase city centre population - must incentivise investment in city centre housing
- The need to rebalance business rates which effectively subsidise out-of-town retailing
- LEZ questioned – need to be flexible to retain accessibility
- Stretch council action with buy-in from others such as students, universities, and companies
- Set up a landlords' forum
- Events and soft play can help create active spaces
- Evening activity - more activities for students and young people needed
- Consider designating a business improvement district
- The car is still important - a balanced approach is needed
- Reopen the city centre to cars
- Ensure the waterfront is integrated with the rest of the city centre



This was a positive and stimulating event with participants putting forward practical ideas to improve the city centre. The Courier should be commended for getting this debate underway.

The pedestrianisation experiment - time for a change?

Adam Hutcheson



B Illsley

The decline of Dundee's city centre retail environment presents a complex challenge which is rooted in multiple factors. Among these, two primary causes stand out as significant contributors to this decline, yet also represent areas where intervention may yield positive outcomes.

Firstly, the pedestrianisation scheme implemented in the 1990s has had a notable impact on the decline of retail activity within Dundee's city centre. While designed to foster pedestrian-friendly environments, the scheme has simply restricted vehicular access to key retail areas such as Reform Street, High Street, Murraygate, and Cowgate. This limitation has resulted in diminished vibrancy, reduced on-street parking availability, compromised accessibility, and declining trade.

Pedestrianisation schemes commonly face criticism for fostering conditions which are conducive to vacant premises, anti-social behaviour, vandalism, homelessness, and drug use. It is all too apparent that Dundee suffers significantly from such ills. Although the decline of retail zones within Dundee's city centre cannot be solely attributed to the pedestrianisation scheme, its exacerbating effect is undeniable.

In light of this trend across the UK, progressive councils including those in Norwich, Colwyn Bay, Buckley, Holywell, and Bridgend, are revisiting their pedestrianisation strategies, driven primarily by concerns voiced by local traders. Given that over 50% of Dundee's city centre visitors arrive by car, it is imperative that Dundee City Council considers experimenting with partial or complete de-pedestrianisation so that its impact on the declining retail zones within pedestrianised areas may be properly evaluated.

Secondly, the rise and prominence of out-of-town shopping areas have further compounded the challenges facing Dundee's city centre. These areas offer attractions such as free parking, extended parking times, convenient access to major routes, absence of Low Emission Zone (LEZ) charges or restrictions, and an expanding array of fast food and drive-through options. The impending M&S move, from the city centre to Gallagher Retail Park, underscores the adverse impact of out-of-town shopping areas on the vibrancy of Dundee's remaining retail landscape.

Additionally, a misalignment between current retail policies and the developing active travel routes further exacerbates the decline of Dundee's city centre. Policies that prioritise walking and cycling in the city centre, while concurrently facilitating and encouraging vehicle use on the outskirts, raise questions regarding their efficacy in both promoting reduced pollution and fostering city centre commerce. This contradictory approach favours cyclists over vehicle users within the city centre, while simultaneously facilitating vehicle use on the outskirts, and is likely to contribute to the city centre's decline.

In order to revitalise Dundee's city centre, a comprehensive re-evaluation of historic policies is essential. Merely continuing with pedestrianisation or green initiatives without addressing concerns regarding vehicular access risks further aggravating the decline.

It is possible to draw insights from thriving retail and leisure communities in other areas, such as London's Oxford Street, Marylebone High Street, and King's Road, and this exercise can offer valuable guidance. Each of these successful retail areas mentioned has a busy dual

carriageway thoroughfare with even busier pedestrian movement on wide and well-maintained pavements which are enhanced by attractive planters and seating.

Closer to home, Dundee City Council can look to successful zones like Broughty Ferry, Perth Road, West Port, and Albert Street, which benefit from bustling and accessible carriageways and pavements, with on-street short stay parking. I am convinced that this tried and tested formula presents a viable blueprint for Dundee's rejuvenation.

In conclusion, Dundee possesses the potential for revitalisation, but this goal can be achieved only with bold and comprehensive policy adjustments. Renewed commitments to creating a vibrant and accessible city centre that caters to all segments of society are essential for realising Dundee's revival as a thriving retail destination.

Adam is Director of Westport Property.



Dundee Design Festival 2024 Brian Cram



I'd like to turn over a new leaf and give up being Mr Grumpy for a wee while. Here in Dundee we don't often get carried away when things go well for us or recognise success. However, there's at least one group who have been working away keeping Dundee at the forefront of design and innovation. For ten years Dundee has been a UNESCO City of Design and to celebrate the fifth Dundee Design Festival will be held on 23rd to 29th September this year in the Michelin Scotland Innovation Parc, MSIP. I think it's something positive to shout about, and it will have lasting benefits – if we just have the mindset to see it. Hence my no more Mr Grumpy attitude.

Dundee Design Festival is Scotland's national celebration of contemporary design. This year's theme is MULTIPLICITY, and the aim is to show the multiplicity of ways that design shapes our world. The exhibition programme brings over 100 designers from every design category together under one roof and is brought to life by demonstrations, workshops and talks.

Part of the reason that this festival is in Dundee is to do with the combination of an excellent art and design school in the form of Duncan of Jordanstone College of Art and Design, at Dundee University, and an excellent school of design and informatics, offering games and computing degrees, at Abertay. Having artistic talents and computing talents, both working to the highest possible standards, allows a breadth and depth of design that is rarely combined. In an earlier era, Dundee workforces built Sinclair computers and Polaroid Cameras and Timex watches.

I think we need to remember that good ideas and designs need good workforces to turn out the products. But they won't be the workforces of the past, and here's where my optimism comes in. The MSIP has the possibility to support the creation of products not just the invention of them. That is a tremendous advantage, and I think Dundee Design Festival is an interesting, useful and necessary step forward. [Dundee Design Festival – 23–29 September 2024](#)

As Creative Director Dr Stacey Hunter says, "For that site to be situated where it is and with great transport links. To be powered by windmills on the site that produce clean energy. To be powered by sustainable energy that comes from the recycling plant next door. It's just incredible!"

Planning Update

Fionn Stevenson

April and May were relatively quiet for the Planning Group in terms of new planning applications. We have responded to a few, however.

New Farmhouse, Star Inn Farm at Mains of Fowlis (24/00200/FULL). This unsightly new house, to be built within an existing farmyard, looks more like a truck container. We have objected in strong terms to this, aiming to raise Dundee's housing standards.

Conversion of building to form **13 self-catering apartments and events space, Jessie's Kitchen, 3 Albert Road, Broughty Ferry (24/00247/FULL and 24/00246/LBC).** In principle a Boutique Aparthotel might be welcomed in Broughty Ferry for tourism development. The alterations to this prominent B listed mansion are mainly internal and do not affect the elevations. There is no Design and Access statement. We have supported this development but with a number of conditions suggested.

Conversion of existing building into **flatted development (18 units), 67 King Street (24/00196/FULL).** This B-listed Flax Mill is to be converted into a student hostel with a variety of shared flat types. It is heartening to see the provision of housing accommodation in existing empty buildings in the city centre, and we have responded positively with several conditions suggested for further improvement.

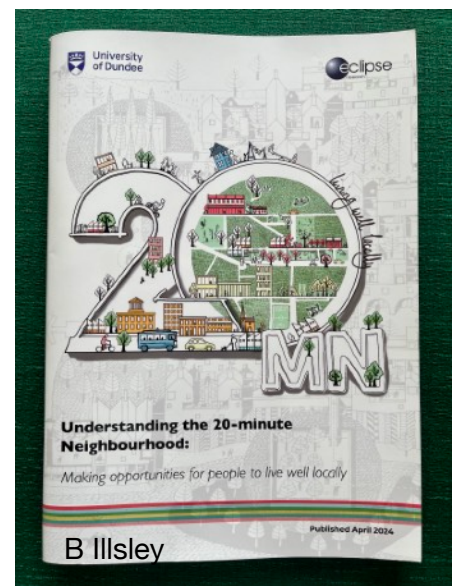
Barbara Illsley, Fionn Stevenson and Jock Stout attended the excellent 'Understanding the 20-minute neighbourhood' seminar at the V&A on Friday 19th April, hosted by Dr Husam Al Waer to launch his new publication of the same name. There was also a meeting with Caroline Grewar, Programme Director at the V&A, to discuss mutual collaboration between our two organisations over a possible joint event based loosely around "resilient intensification" in our cities through good design.

The Council's recent Bus Journey Improvement Consultation proposed to remove over 100 bus stops in the city to 'speed up bus journey time' (see item below). We noted that the Dundee Pensioners Forum produced an equally robust rebuttal.

The DCT Chair has written to Robin Presswood highlighting our concerns about the proposed new Magdalen Bridge developed by Sustrans. He commented on the need to consider the overall provision of a proper cycle network and the need to distribute funds more appropriately.

The initial Dundee Local Development Plan 3 Evidence Gathering consultation consisted of three Topic Papers: Biodiversity, Town Centre First and Health and Safety. We responded to the first two of these, with recommendations for additional datasets to be created relating to empty property above occupied shops, revised mapping for watercourses, forestry and soils within the city centre to allow for 'daylighting', additional nature sites and identification of food growing areas with good soil quality. We expect to see more Topic Papers in the coming months.

The PBSA Student Accommodation subgroup has held two meetings so far and produced a draft survey. We have had no response from the four developers we have contacted. It was agreed to defer the survey until September, once the students have been in their accommodation for a couple of weeks.





A summary article has been written for Councillors on the DCT Housing Design Guidance Recommendations.

The Trust is to continue its campaign to draw attention to threatened old buildings in the city centre.

Finally, **the Eden Project** was granted planning permission at the Planning Committee on 17th June. The Planning Group sent a Deputation to welcome this inspirational project. We highlighted the need for access routes to be resolved and greater ambition towards a net zero carbon development.

Longer walk to the bus?

Donald Gordon/Fionn Stevenson

Dundee City Council launched a consultation in April, with the aim of improving bus journey times. The Council proposes to remove over 100 bus stops across the city, roughly ten per cent of the total. Dundee Civic Trust was able to lodge responses within the time limit, and we had a number of concerns about the proposals. These included:

- More effort is needed to provide buses that are easily accessible and convenient, and speedily boarded. This will help deliver a more rapid journey for passengers.
- The removal of bus stops will mean that people, including the old, the young and the infirm, will have to walk further to their nearest bus stop, often in the cold – or occasionally heat - and rain and wind. This will seriously affect those groups who have the most need to travel by bus, and who may well not have access to a car.
- Many bus stops are near to key amenities, such as schools, shops, football grounds and community centres. This proposal will negatively affect those amenities and the people who wish to use them.
- There is a recommended distance of 400 metres between bus stops. The removal of a bus stop will increase the distances between bus stops to more than this distance. Research has shown that if you extend the distance between stops, people will tend to stop using the bus and will choose another form of transport, for example the car, or will be unable to travel at all.
- The bus journey time saved by removing a bus stop is often minimal. The additional time needed for passengers to walk to another bus stop which is further away will be greater, meaning that the total journey time for passengers will be longer, rather than shorter as is hoped for.
- Many bus routes are rather circuitous, and more time will be gained by the re-planning of these routes than by removing bus stops.



- Traffic congestion is the biggest cause of delay. Congestion should instead be addressed first, in order to reduce delays and shorten bus journey times. Key arterial roads, particularly crossing the Kingsway, are especially busy, and delays are inevitable. Junction design must be improved to give priority to public transport.
- Parking around bus stops also causes delay
- The Dundee Sustainable Transport Delivery Plan includes proposals for smart ticketing which, if properly designed, will avoid the extensive queuing time that sometimes happens at bus stops. Faster boarding would have a greater impact than removing bus stops, which simply increases passengers' queuing time to other bus stops, and further delays to buses at those stops.

We believe the bus stop proposals in this consultation are poorly considered and will not improve bus journey times or passenger experience. The proposals may be a cost cutting exercise with the aim of reducing maintenance of bus stops and shelters. As well as implementing the suggestions we have mentioned, *more* bus shelters should be placed at busier stops, to help to create an attractive and efficient bus service, used by more passengers.



Finally, we suggested in our response that if the decision is taken to remove particular bus stops, there should be a trial period of, say, three months, so that proper, evidence-based criteria can be established *before* any are permanently removed.

The consultation period has now closed. We await the result.



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