



Dundee City Council Local Development Plan 3 Review – Call for Ideas Stage Response from Dundee Civic Trust

March 2026

Summary

1. Introduction

Dundee Civic Trust welcomes Dundee City Council's review of the Local Development Plan 2019 (LDP19), and we are glad of the opportunity to respond to the Call for Ideas.

LDP19 had many useful and interesting policies, but is now well out of date: several of the significant aspirations have not been achieved, and, importantly, National Planning Framework 4 (NPF4) came into effect in 2023, altering and updating the vision through which national and local governments view the future of living in Scotland. Our "Vision" in this response considers that the time has come for the next local plan to be bold and dynamic. In the following responses we use the same layout of sections as is contained in the existing LDP2019 document, with our comments and responses in each section.

2. Vision and Strategy

The LDP Vision lacks a constant thread throughout its objectives. It needs to be **bolder**, more flexible and more coherent in its view of **policy integration** across all sectors. "Masterplans" are overly fixed and rigid, and should be replaced by more flexible planning "Frameworks". Dundee's boundaries are the most constrained in the country and need to be expanded outwards to include adjacent settlements on the North side of the Tay; this will make the city more sustainable and effective as an economic and social hub.

3. City of Design

Dundee's UNESCO City of Design status is unique and important, but receives far less local recognition than it deserves and requires. So, it should drive a far stronger, design-led Local Development Plan. Current policies lack clarity and ambition, and must be aligned with NPF4's 'Six Qualities of Successful Places'. They must be supported by clear design guidance as well as mandatory Design and Access Statements for all significant developments. The Trust recommends that rigid masterplans should be replaced by flexible, participatory **design frameworks** that coordinate development and infrastructure across the city.

The public art requirement should be strengthened, and a unified City Centre Design Code introduced to guide vacant plots and waterfront sites. A multidisciplinary **Design Review Panel** is proposed which, when implemented, will improve governance and reinforce design quality. Increased **density**, including taller buildings in the city centre, should be supported to ensure that liveable neighbourhoods are viable.

4. Sustainable Economic Growth

In the LDP2019 document there is an emphasis on the creation of **Development Areas** in order to provide successful sustainable places. These need to be integrated within a citywide planning framework, and with a greater emphasis on the individual actions that will deliver sustained economic growth for the local economy and tourism. It is acknowledged, however, that they cannot be delivered without increased government funding and investment from



the private sector. These also need to be integrated into a citywide **Framework for Economic Growth** which sustains and develops the local economy and tourism.

5. Quality Housing and Sustainable Communities

Dundee has the potential to reshape its **housing future** through higher-density urban living, reuse of vacant buildings, and a stronger, evidence-based approach which is aligned with principles that feature throughout NPF4. The Trust highlights the **housing emergency** and the gaps in the city's statistical data, and we call for a comprehensive Housing Land Audit covering all empty homes, unused upper floors and windfall sites. Priorities for action include reducing **car dominance** by using the city centre as a model for low-car development, and reinvesting space into placemaking and community facilities.

Housing should be supported through **Planning Performance Agreements (PPA)**, pre-approved change-of-use principles and strong design oversight. Policies should promote **diverse housing types**, retrofitting of suitable buildings, mixed-use development and a Healthy Homes Standard covering daylight, ventilation and climate resilience. Student accommodation must be adaptable for future residential use. The Trust recommends use of its own "Dundee Housing Design Recommendations", in the absence of such housing guidance.

6. Town Centre First

The city centre is a key component of the city and reflects the health of the wider community. A city centre must display activity and vitality across all sectors during both the daytimes and evenings. This can primarily be encouraged by promoting additional **living units** to increase the resident population in the centre, and thus the viability and vitality of the centre. Facilities to be developed and encouraged include the **Wellgate Centre, Overgate Centre** and the **Waterfront**, shop developments, public transport, including a resited bus station; **mixed use developments**, including office spaces. Review strategic investment plans for **new build facilities**, the conversion of **existing buildings, mixed use frontages; walking loops** for city centre users; promoting **evening use** and access with **public houses, restaurants and hot food takeaways**. As a corollary to this, planning permissions should be reduced for larger **out-of-town retail developments**.

7. Sustainable Natural and Built Environment

The vision of LDP2019 needs to be expanded to include the concept of "**regenerative design**". This involves putting more biodiversity back into the city than already exists in it, to make up for significant biodiversity loss. The city's **green infrastructure** should be expanded to include all streets as sites of biodiversity and more Local Interest Nature Conservation Sites.

Individual flood risk assessments should be expanded into a *much broader and heightened risk* framework, with design solutions making use of enhanced biodiversity to mitigate flooding risks. Waste management should include more decentralised re-use centres next re-cycling centres.

A systematic city-wide **energy strategy** is needed to produce a more distributed and resilient, renewable energy network with local heat networks based on high density areas only, and a relaxation on the installation of renewable energy systems in conservation areas. There should be a presumption generally against the demolition of buildings and a demand for a detailed conservation statement for all proposed alterations to existing buildings.

8. Sustainable Transport and Connectivity

NPF4 states that LDPs should promote a place-based approach to reduce car travel, which is a prime cause of pollution and congestion. The provision of a proper bus service is key to the city functioning yet it must respond to a range of conflicting demands. **Good bus routings** are essential, which accommodate the larger number of travellers, as is the need for **journey directness** and quicker journey times. Bus operators must address the poor **ride quality of their bus fleets**, and the Council must re-surface significant bus routes.



The **regional bus/coach station** in Seagate is not in the right place. **Site 2 on the Waterfront** is preferred by many. Rail services are particularly important to Dundee's economy. The city's priority for better railway infrastructure is the **line to Edinburgh**. **Electrification and modern signalling** would shorten journey time on longer routes. The Scottish Government should consider allocating Perth and Kinross Council discretionary grants to **bypass the four Perthshire villages** through which the A94 runs. This will reduce delay, congestion and pollution on the A90 Kingsway, and the need for substantial upgrade works on Kingsway.

Active **travel opportunities** should be pursued, though cycling in Dundee has major drawbacks as a mass travel mode. The Council should focus on **devising cycle routes** which are not on, or immediately abutting, main traffic routes, and focus instead on relatively flat routes where possible.

9. Annex

This section shows some of the relevant policies already adopted by DCT, or which are in the course of being published, as at March 2026. They are all relevant to the fullest consideration of LDP 2019.

1. Introduction

Dundee Civic Trust (DCT) was formed in 1973 as a voluntary body and charitable trust. Its aims are to encourage the highest standards of design in new buildings and regeneration projects, and to stimulate the public's interest in the city's urban heritage. DCT regularly comments on planning applications and engages with developers at pre-application consultation meetings. With over 230 members, some of them retired professionals including town planners, architects and engineers, DCT possesses within our ranks sufficient expertise and knowledge of good practice to be able to provide a relevant commentary on these matters.

Dundee Civic Trust welcomes the review of the existing Dundee Local Development Plan (*LDP2019*) for our city. This comes at a critical time when the new National Planning Framework 4 (*NPF4*) has been introduced across Scotland, with new strategic policies that have major implications for revising Local Development Plans. It must also be seen in the context of a national housing emergency, with long waiting lists in our city for affordable housing and poor quality private rental housing in some wards. There is also the climate emergency to consider. Dundee has reinvented itself over the last twenty years and there are still many major opportunities for developing further environmental, social and economic benefits through the planning of our built environment. We have used LDP2019 as guidance in preparing these comments, but we believe the LDP needs reconceiving as more integrated document which serves as a vision for future action.

In our response to the review, we are focusing on the city centre as a lens through which to examine existing policies for the LDP. We also propose certain revisions, drawing on the content of NPF4. We define the city centre of Dundee as the area inside the inner ring road.



2. Vision and Strategy

2.1 Dundee's vision

Our vision needs to be bolder, more flexible and more coherent. At the present time the City Council seems to chase after funding and make planning decisions around what finance is available, rather than the other way around (for example, Active Travel Routes were initially considered without considering essential public transport connections). Various visions have been produced for parts of the city, many of which do not take into account the wider city context. Masterplans are produced which are too inflexible and out of date by the time they are finished. We consider that these should, instead, be looser strategic "Frameworks" rather than based on fixed and siloed planning policies. An over-arching and coherent **city-wide framework** should replace the existing siloed masterplans / developments, and these should be both flexible and adaptable (*LDP policy 1: Placemaking, policy 21: Town Centre First Principle*).

Here are examples of some Frameworks:

2.1.1 The city centre should be used as the demonstrator for sustainable, car-light, high-amenity development (*policy 21: Town Centre First Principle, policy 22: City Centre Retail Frontages, policy 54: Safe and Sustainable Transport, policy 56: Parking*).

2.1.2 Strategic policies must be **integrated** across housing, transport, education, environment, and design, taken together, in order to create connected, liveable neighbourhoods (*LDP policy 1: Placemaking, policy 54: Active Travel, policy 56: Parking, aligned with NPF4 Compact Urban Growth*).

2.1.3 Dundee's UNESCO **City of Design status** must be embedded as a requirement, not just branding (*LDP policy 1: Placemaking*).

2.2 Dundee's Boundaries

Part of Dundee's vision, and the best development of its local plan relates to its boundaries, which need to be expanded to include the immediately adjacent villages of Invergowrie and Monifieth, and the surrounding areas. These small population centres were inside the Dundee boundaries for a number of years until 1996. These boundaries within which our city is constrained mean that there are financial, economic, and fiscal challenges which limit the development of Dundee to its proper potential. There are significant inefficiencies and conflicts which relate to planning (many housing estates being in neighbouring council areas and have an effect on Dundee's services); education (many children having to travel miles to a school instead of a nearby one; roads, and even bin collections. A summary of DCT's policy is in the Annex section 9.1, and the full policy is in our website: <https://www.dundeecivictrust.co.uk/the-case-for-expanding-the-dundee-city-boundary/> .

3. City of Design

3.1 Introduction

Dundee has a proud history as a small city which produces great design, alongside many innovations. Given that Dundee also has the prestigious status of UNESCO City of Design, the design-led approach in this LDP should be greatly strengthened, with extended guidance and more robust policies. There is also an opportunity



for more holistic planning development policies that ensures wider infrastructure requirements are taken into account, beyond individual developments as well as within them. Planning within our city remains too piecemeal and opportunist, without due consideration of what neighbourhoods, and the city as a whole, actually requires in order to be liveable.

3.2 High Quality Design Placemaking

This is weak in ambition, with no real guidance on the highest quality of design. Other cities have produced design guides, so why not Dundee? This policy needs to be rewritten in light of NPF4. It should use the specific qualities named in the NPF4: “*Six Qualities of Successful Places*”, so that there is no vagueness or ambiguity about what exactly is required for successful design. Qualities No.2, 4 and 6 need addressing in particular as these essential aspects lack relevant policies in this section of LDP2019.

The supplementary guidance on “Householder Development – Advice and Best Practice” in this section is also weak. The Edinburgh Design Guides for best practice are relevant:

<https://planningedinburgh.com/2025/09/25/new-planning-guidance/> . Every city in Scotland must have similar guidance developed as part of their LDPs in order to ensure good design practice. DCT has published a comprehensive paper on Housing Design Recommendations in partnership with the Dundee Institute of Architects which will be submitted separately to this paper: <https://www.dundeecivictrust.co.uk/dundee-housing-design-workshop-june-2023/> .

We consider that *all* planning applications which involve the delivery of new or retrofitted habitable buildings should be required to submit a Design and Access Statement. A brief statement would suffice for smaller applications under ten dwellings. Larger developments would require a much more detailed Statement. This will ensure that all relevant design aspects are given due attention. The Planning Department should prepare a revised template for Design Statements, which draws on the guidance contained in NPF4. See also Section 3.2.4.

The use of individual masterplans on their own, by either developers or the council, is harmful and piecemeal. The Council should encourage a more coherent, city-wide approach to designing any large scale development, with due attention paid to wider infrastructure planning. This will ensure that wider implications for the city as a whole are identified, understood and acted upon. It will also ensure a more joined-up approach to developing areas within the city, in relation to each other. This can also be beneficial in terms of change management in relation to city-wide principles such as “Town Centre First”. See also section 6. We wish to see the development of a policy which takes account of and relates to the over-arching vision and strategy.

This can be advanced through:

3.2.1 Design frameworks

These are more flexible than masterplans, which tend to cast visions “in stone”. Design frameworks, on the other hand, allow developers to co-create environments more responsively with future and present inhabitants. A good example of a design framework is the one used to develop a neighbourhood for 5,000 inhabitants in Vauban, Freiburg:

https://urbandesignlab.in/vauban-eco-district-freiburg-as-a-model-for-sustainable-urban-regeneration/?srsltid=AfmBOooC6O4Y2eR7TC8QXL5z36Ok4_1KgjiGqFlcVirwGo_2FPmkkn .

We wish to see a policy developed by the Council that will encourage participatory design frameworks for use



by all Dundee developers.

3.2.2 Public Art

This needs to be strengthened as a policy. It should be made clear that the **public art contribution** must form a detailed part of the planning application, and not simply be referenced and subsequently ignored. People need to see exactly what public art is being proposed and where, and the proposals need to be executed (*LDP policy 2*).

3.2.3 City Centre Design Code

A coordinated **design code for the city centre and waterfront** should be created, in order to unify the development of vacant plots and existing assets. Success here will build the confidence to apply codes to other redevelopment areas, especially major allocated sites. (*LDP19: policy 1: Placemaking, Proposal 1: Blackness Regeneration*).

3.2.4 Design and Access Statements

Design and Access Statements should be required for all developments of more than ten housing units, to demonstrate compliance with the six qualities of successful place in NPF4, mentioned above (*LDP policy 1: Placemaking, policy 10: Design of New Housing*). These statements should be appropriate for the scale of the development.

3.2.5 Dundee Design Review Panel.

A multidisciplinary **review panel**, incorporating the interests of architecture, transport, landscape and community, should be established with expert reviews of planning applications before they are lodged. The panel would review projects above a certain size and also those which are prominent or which demonstrate significant civic context. This will fill Dundee's governance gap and reinforce its UNESCO City of Design status.

DCT proposes, in a separate document that will be submitted, the establishment of a **Design Review Panel** for Dundee. A summary of the proposal is found in the **Annex**, Section 9.5 and on our website here: **XXXX**. (*LDP policy 1: Placemaking*).

3.2.6 Increased Density.

It is appropriate to allow taller buildings (up to 8 storeys) in the city centre to support housing supply, and thus activity and vitality in the centre (*LDP policy 10: Design of New Housing, policy 21: Town Centre First Principle, aligned with NPF4 Compact Urban Growth*).

4. Sustainable Economic Growth

4.1 Introduction

GDP is one measure of the health of the economy, and values are available for each Local Authority in the UK. The last available figure for DCC was in 2020 and was measured at £27,200 per capita. For Aberdeen City Council it was £45,490 pc in 2021 and for Edinburgh it was £69,800 in 2023. In 2024/25 DCC total income was £848m, mainly from Government Grants (66% of total), Fees and Services (26%) and Council Tax (8%).



Expenditure was £911m of which City Development, at £81m, comprised 9% of the total. It can be drawn from these figures that sustained economic growth will come mainly from private investment and additional Government Grants.

4.2 Growing the local economy. This is a key focus for Dundee City Council. The control of and support for the use of land and buildings is an important component of this focus, but it is not the only one. Other ambitions, activities, partnerships and support mechanisms are outlined in the many strategies and frameworks of the Council and its partners.

Some suggestions for action are given here:

4.2.1 Framework for Growth. The Council should create a **Framework for Growing the Local Economy** which outlines how the Council will use its powers, land, buildings, budget and staff in partnership with governments, agencies, partners, businesses and local communities, in order to achieve its objectives and ambitions. The Framework should be reviewed regularly to adjust for changes in the economic situation during the life of the LDP.

Activities in this area include:

4.2.1.1 Allowing housing on **vacant sites** at Technology Park;

4.2.1.2 Reviewing those developments in the **Blackness** area which need to be reimaged;

4.2.1.3 Supporting Forth Ports in plans to expand **Dundee Port**, including the development the cruise ship terminal.

4.2.2 Local Neighbourhoods: NPF4 advocates local liveable neighbourhoods with facilities and services which may be reached within a twenty minute walk for residents. Small businesses are the backbone of local economies and provide employment and services as well as start-up opportunities for entrepreneurs and the opportunity to grow to medium and large enterprises. All classes of small business should be supported in local neighbourhoods provided:

- there is no detrimental impact on neighbouring businesses or local residential amenity,
- there is no unacceptable traffic impact,
- the scale of development is appropriate to the size and location of the site.

See paragraph 5.2.6 & 6.2.5 below.

4.2.3 Temporary use of buildings: Identify **temporary creative workspaces** with reference to other cities doing this (eg, Sheffield) and similar practices in Australia (Newcastle).

4.2.4 Historic Buildings: Dundee has almost 900 listed historic buildings, monuments and landscapes, which gives the city and its neighbourhoods their unique identity. Their preservation and positive re-use as appropriate are essential both for residents and for visitors. Many old industrial buildings and redundant churches require new uses to contribute to the city's economy and wellbeing. The Council should create a **Strategy** for the preservation, adaptation, enhancement and re-use of historic buildings with a presumption against demolition, which will encourage new uses for the benefit of residents and visitors. VAT on the cost of repairs to existing buildings should be removed. See the DCT policy, in **Annex**, Section 9.3.



4.2.5 Tourism and Leisure Developments: *Policies 7 and 8* from LDP2019 are appropriate and clear, however they should be reviewed throughout the life of the LDP and adjusted as necessary. More visitors and Dundonians will be encouraged into the city centre if there are cultural and leisure facilities that may be encouraged to continue to thrive and develop, and which demonstrate Dundee's unique identity and culture.

That is what visitors to our city come to see, and this can in part be provided by the establishment of **small scale museums**, for example, Adam Duncan Maritime; D'Arcy Thompson Natural History; DC Thomson Comics/Gaming; Tayside Medical; Broughty Ferry Barracks. See paragraph 6.7 below.

4.2.6 The existing plans to achieve sustained growth have served the Council well in giving clarity and purpose to incoming and expanding businesses and as such they should be retained in the new LDP. However, the economy is ever changing and they should be updated regularly via an **investment land audit** and adjusted if appropriate. (*LDP2019, Development Areas in the city: Policies 3: Principal Economic, 4: Specialist Economic, 5: General Economic, and 6: Ancillary Services in Development Areas*).

4.3 Engagement with Scottish and UK Governments

Dundee City Council has many opportunities to discuss, negotiate and lobby the Scottish and UK Governments, and they should do so readily.

Some example of matters to be lobbied for are:

4.3.1 The case for development of **Greater Dundee** through extended boundaries is made in Section 2.2 above, and in the **Annex**, Section 9.1, and the Council should lobby the Scottish Government to achieve this necessary goal.

4.3.2 All potential sites, both private and publicly owned, which have **remediation problems** should be identified and Government funding applied for, to prepare them for future development.

4.3.3 Identify which new **Public Sector offices** the city wishes to attract, and identify and incentivise potential sites for this purpose. This will require active lobbying of government departments.

4.3.4 The City Council should lobby the UK Government to have VAT removed on the cost of repairs to existing buildings. The imposition of 20% VAT is a significant disincentive to owners who wish to renovate city centre buildings. See the DCT policy in **Annex**, Section 9.3.

4.3.5 Traffic congestion on the A90 Kingsway would be ameliorated by the improvement of sections of the A94 route, which would also improve the flow of through traffic. This should be raised with the Scottish Government. See Section 8.8.3, and the DCT policy in **Annex** Section 9.6.

5. Quality Housing and Sustainable Communities



5.1 Introduction

Dundee has an extraordinary opportunity to reshape its housing future. Few cities of its scale have such a concentration of underused buildings, vacant upper floors, adaptable industrial structures and walkable neighbourhoods waiting to be re-energised. With its compact form, rich architectural heritage and growing

cultural identity, Dundee is uniquely placed to deliver **a model of urban living that is sustainable, design-led and centred on a vibrant, repopulated city core**. The next Local Development Plan can set the conditions for this transformation by prioritising reuse, supporting higher density, reducing car dominance and creating healthier, climate-resilient homes.

Realising this potential requires that the challenges which hold the city back are confronted. Dundee faces a well-documented housing emergency, with Shelter Scotland's Housing Emergency Action Plan (HEAP) calling for urgent action to increase supply, improve standards and bring empty homes back into use. At the same time, Dundee Civic Trust has repeatedly highlighted structural gaps in the city's evidence base — including incomplete datasets on long-term empty homes, vacant buildings, unused upper floors, windfall sites and self-build demand — as set out in our *Survey Response to the Topic Paper: Quality Homes and Site Methodology*. These concerns build on the Trust's wider work on housing quality, including the 2023 Dundee Housing Design Workshop and the resulting Housing Design Recommendations (available on the DCT website: [Dundee-Housing-Design-Workshop-Recommendations-16.10.2023.pdf](#)), which emphasise the need for a design-led, evidence-driven approach to both new housing and conversions.

Yet, these challenges emphasise rather than diminish the scale of Dundee's opportunity. The city centre contains substantial capacity for new homes through conversion, retrofit and sensitive densification. NPF4's emphasis on compact urban growth, climate adaptation and design quality aligns directly with the Trust's long-standing advocacy for a housing strategy which strengthens the urban core, reduces carbon emissions and improves quality of life. With the right policies, Dundee can lead Scotland in demonstrating how a mid-sized city can grow sustainably while enhancing its character and supporting a thriving local economy.

5.2 The following priorities set out DCT's recommended approach to housing within the new LDP. Each theme is linked to the relevant LDP housing policies (9–20) and the supporting NPF4 policies, which provide a clear framework for implementation.

5.2.1 Reducing Car Dominance

Use the city centre as a template for car-free and **low-car development**. Require shared surfaces/Home Zones as well as developer investment in active travel and public transport. (*LDP19 policies: 10, 12, 20; NPF4: policy 13, policy 14*). See paragraph 8.2 & 8.3 below.

5.2.2 Density & Placemaking Benefits

Reduced car parking makes space available for placemaking, supports **walkable communities**, and sustains local amenities such as GP surgeries and community facilities. **Higher density** strengthens transport links and makes local services viable. (*LDP19 policies: 10, 12, 13, 18; NPF4: policy 1, policy 14*). See paragraph 8.7 below.

5.2.3 City Centre Housing



Encourage redevelopment of existing city centre buildings through **Planning Performance Agreements (PPAs)**, giving developers certainty on process and timelines. Provide pre-approval in principle for change of use on sites and empty plots which have undergone assessment, while requiring detailed major design proposals to go through the Design Review Panel. This balances flexibility for developers with robust design oversight. (*LDP19 policies: 12, 12a, 15; NPF4: Policy 27, Policy 14*). See paragraph 6.2.5 below.

5.2.4 Employment Protection

Safeguard retail and employment uses to maintain city centre vitality. Pre-allocated change of use approvals should only apply where assessments confirm that employment contribution is limited, thus ensuring housing growth does not undermine retail anchors or service provision. (*LDP19 policies: 12, 15, 17; NPF4: policy 23*).

5.2.5 Retrofit Policies

Introduce new policies for retrofitting existing housing and converting non-residential buildings, conserving **embodied carbon** and adapting stock for **climate resilience**; and remove **VAT** on the cost of this work. See the DCT policy in **Annex**, Section 9.3. (*LDP19: policies require e.g. 10a, 12a; NPF4: policy 9, policy 2*).

5.2.6 Typology Diversity & Tenure

Revise *Policy 10* to require a mix of housing types and tenures, with a particular emphasis on **smaller homes** in the city centre designed for an urban-lifestyle focus. This supports affordability, attracts residents who value compact, **flexible living**, and strengthens the local economy. Concentrating housing in the city centre sustains the night-time economy, reinforces demand for cultural and leisure uses, and ensures a vibrant, balanced urban core. Larger family homes and downsizing units should be directed to other parts of the city, while the city centre focuses on density and walkability. (*2019 LDP19: policy 10 (Design of New Housing), 12 (Formation of New Residential Accommodation), 14 (Residential Accommodation for Particular Needs); NPF4: policy 16 (Quality Homes)*).

To support the ambition in NPF4 for compact, liveable neighbourhoods, the LDP should actively promote **mixed-use development** within the city centre and surrounding areas. Housing growth must be accompanied by local services, small-scale commercial uses, community facilities and flexible ground-floor spaces which can adapt over time. This approach strengthens neighbourhood vitality, reduces the need for travel, and supports a balanced urban ecosystem where people can live, work and access services within a short walking distance. See also Section 6.3. (*LDP19: policies 17 (Small Scale Commercial Uses within Residential Areas), 18 (Community Facilities), 26 (Local Shopping Provision); NPF4: policy 14 (Design, quality and place), policy 15 (Local Living and 20 minute neighbourhoods), policy 27 (City, town, local and commercial centres)*). See paragraph 4.2.2 above and 6.2.5 below.

5.2.7 Healthy Homes Standard

Strengthen LDP housing policies to ensure that all new and converted homes achieve **high standards of internal quality**, including daylight, ventilation, acoustic comfort, climate resilience, minimum space standards (including homeworking provision) and access to outdoor space. Scottish policy already points in this direction through *NPF4 Policy 14*, and wider UK research — such as the *Healthy Homes* work — offers useful reference material when shaping a Dundee-specific approach. (*LD19: policies 10, 12, 14; NPF4: policy 14 (Design, Quality & Place)*). <https://www.gov.uk/government/publications/healthy-homes-standard/healthy-homes-standard-a-foundation-for-healthier-and-resilient-communities> is good guidance from England.

5.2.8 Housing Land Audit & Evidence Base



DCT supports the intent of LDP 2019 *Policy 9* but recommends that it be strengthened to require a transparent, comprehensive and regularly updated Housing Land Audit. The scope of the Audit should include long-term empty homes, vacant non-domestic buildings, unused upper floors, and a clear record of windfall and small sites, including those that have entered or fallen out of previous HLAs. A **complete evidence base** is essential for delivering a reuse-first approach, accurately assessing housing capacity and ensuring that brownfield opportunities are prioritised before any greenfield release. (LDP19: *policies 9, 12, 12a; NPF4 Policies: 9, 16*).

5.2.9 Householder Development

Strengthen Policy 11 by introducing clear, **design-led guidance** for householder development, similar in scope to Edinburgh's Non-Statutory Guidance for Householders:

https://democracy.edinburgh.gov.uk/Data/Planning%20Local%20Review%20Body/20190327/Agenda/item_72_-_non-statutory_guidance.pdf. This should set out expectations for extensions, roof alterations, amenity impacts (daylight, sunlight, privacy), garden ground, materials, sustainability and neighbourhood character. A more detailed framework would support consistent decision-making, improve design quality and give greater clarity to householders and practitioners. (LDP19: *policy 11; NPF4: policy 14 (Design, Quality & Place)*).

5.2.10 Student Accommodation

Proposed student accommodation must demonstrate that there is clear demand, and must be well located for higher-education access, and achieve high standards of amenity as required by LDP2019. *Policy 15* should be strengthened to ensure that both new and retrofit student accommodation are designed for **long-term adaptability**. Layouts and servicing should enable future conversion to mainstream residential use, ensuring that the city's housing stock remains flexible and resilient as student numbers and market conditions evolve. (LDP19: *policy 15; NPF4: policy 16 (Quality Homes), policy 14 (Design, Quality & Place)*).

6. Town Centre First

6.1 Introduction

The city centre is a key component of an urban settlement and reflects of the health of the wider community as well as providing a focus for residents who are seeking a range of services and opportunities within an easily accessible, safe, and enjoyable environment.

To achieve this requires a city centre which displays activity and vitality across sectors in both the day and evening periods. The current offer and opportunities do not seem to fulfil this requirement. Nor is it likely that the continuation of existing policies in the face of market and consumer trends will improve this without some radical reappraisal and re-positioning of opportunities, policies and direction. Simply put, this requires "increasing the activity in the city centre". "Activity" means people living, working, shopping, educating, entertaining, visiting and includes travelling through the centre.

NPF4 states for Town centres at *Policy 27* that development proposals that enhance and improve the vitality and viability of city, town, and local centres, including proposals which increase the mix of uses will be supported. We must find and develop proposals for uses which will generate significant additional footfall,



including commercial, leisure, offices, community, sport and cultural facilities, public buildings such as libraries, education and healthcare facilities, and public spaces.

6.2 Town Centre First Principle

The enforcement of the town centre first principle appears in LDP19, and it should be more rigorously pursued. *“All new or expanded uses that will generate significant footfall should be located in the City Centre or a District Centre...”*. (LDP19: policy 21 (7.23); Policy 27(7.50-7.52); NPF4: 1;9; 12; 13; 14; 15; 25; 26;27;28; 30)

This can be encouraged, in part, by:

6.2.1 promoting the **Wellgate Centre** redevelopment for Dundee & Angus College;

6.2.2 promoting the **Waterfront** for businesses and shop development, as well as public transport;

6.2.3 reducing planning permissions for **out-of-town developments** which might be better placed in the city centre and especially, (in accordance with DCT’s stated policy), greenfield sites;

6.2.4 developing a policy to achieve **additional living units** in the city centre over the lifetime of the LDP. This would deliver some roughly 4000 – 6000 additional people living in the city centre. This fairly large residential base would justify support for health and educational premises;

6.2.5. providing housing for people to live in. There is an opportunity to marry up the challenges around housing need in the city with using **vacant properties and land** which are spread across the city centre area. (LDP19: policy2 (4.11); policy 21 (7.23) NPF4: 1; 7; 9; 12; 13; 14; 15; 26; 27) . See paragraph 4.4.2, 5.2.3 and 5.2.6 above.

A vigorous policy of providing more city centre housing may be advanced through:

6.2.5.1 a policy to support and encourage links and investments between council/HAs and property owners to increase city centre living opportunities;

6.2.5.2 a related **housing investment plan** and strategy that focuses first on town centre opportunities;

6.2.5.3 encouraging more ground floor dwellings in appropriate locations, to provide active frontages at street level while recognising the balance with retail type frontages;

6.2.5.4 promoting policies to encourage **mixed use developments** which will enhance a sense of achievement of local neighbourhood ‘feel’;

6.2.5.5 designating the **town centre as a discrete neighbourhood**, or number of neighbourhoods, with the aim of stimulating the positive consideration of any investments and changes which will strengthen the communities in the town centre.

6.3. Social infrastructure

The availability of vacant older office premises will allow the provision of community-wide service facilities (for example clinics, primary school) in the city centre, and will help to reverse the shift from central locations to peripheral ones, which requires access to private transport. This would also provide the support infrastructure for the increased housing promoted and the delivery of a functioning community. With a sustainable goal at



the heart of any LDP strategy, it is essential to reduce congestion/pollution, enhance public transport. This should in itself encourage the provision of services and facilities centrally. (LDP19: policy 18 (6.37); policy 19 (6.39); policy 21 (7.23) NPF4:1; 8; 12; 13; 14; 15; 25; 26; 27)

This may be advanced through:

6.3.1 reviewing, with other public agencies, all **strategic investment plans** to establish which proposals should be city centre located in pursuit of the Town Centre first policy;

6.3.2 opportunity sites for the provision of **new build facilities**;

6.3.3 developing policies to promote and deliver the **conversion of existing buildings**, including public sector owned properties, for public service uses which will support the increased central area residents, community and users, and avoid travelling to a distant part of the city for services;

6.3.4 developing an active policy to **facilitate site assembly**, including the use of compulsory purchase order powers when appropriate.

6.4 shops for people to visit

The city centre will remain the key area for retail in the city, which will be physically separate from the existing retail parks across the city. However, there is evidence of a shift in the retail mix moving from national brands to local craft and independent retailers, which is to be encouraged. (LDP19: policy 21 (7.23) policy 22(7.31) NPF4:1; 8; 12; 13; 14;15; 25; 26; 27)

This may be provided through:

6.4.1 City Centre Retail Frontages building on the Eastern quarter master plan with an approach which is more radical and which will include the demolition and reshaping of opportunities, such as on the former M&S and Tesco sites in Murraygate; (LDP19 policy 22 (7.25)) NPF4: 27; 28);

6.4.2 protecting the **Overgate Centre** as the prime retail hub in the city centre;

6.4.3 revising **frontage policies** for retail across the geography of the city centre;

6.4.4 revising policies to support **mixed use frontages** in defined areas/quarters of the city centre;

6.4.5 developing **walking loops** for shoppers and city centre users to raise footfall in secondary locations off the primary streets such as the Castle Street/Exchange Street area, Albert Square/Panmure Street;

6.4.6 Gallagher Retail Park Extension The opportunity to expand this retail site has not been fully implemented since the commencement of the LDP19. It reflects the continuing change in retail activity away from a physical shopping experience to one which is online. This policy is incompatible with the drive to develop the city centre, and should be withdrawn. (LDP19: policy 25 (7.47)) NPF4: 9; 27).

6.5. Offices for people to work in

There has been a stubborn shift to home working since the covid pandemic, but there remains a requirement and opportunity for modern, flexible office space in the city centre. The Waterfront and other sites provide an excellent opportunity to achieve this goal, if proper arrangements can be devised for both public and private



investment. See **Annex Section 9.2.** (*LDP19: policy 3 (5.13-5.22); NPF4:1; 2; 9; 13; 8; 27*)

6.6 Evening activities for people to enjoy

The hours between 5.30–10.30p.m. constitute one third of waking hours, and must be catered for, economically and socially. At present, evenings in the city centre are quiet and not successful, either socially or economically, so it is essential to develop businesses and facilities which can operate in the evenings, such as shops, restaurants and places of entertainment. All of these should be open for large numbers of people coming to the city centre as well as to city centre residents. New buildings in the centre should have a greater density of population than at present. If we start with that, businesses and facilities will follow; but homes, businesses, facilities and infrastructure must be expanded together. The Council's events strategy has been successful, and should be maintained. (*LDP19: policy 27 (7.52) NPF4: 1; 12; 13; 15; 26; 27; 30*.)

This may be achieved through:

6.6.1 having policies on **evening uses**, in partnership with local organisations such as the Overgate Centre, The McManus, V&A Dundee and Discovery Point;

6.6.2 designating streets and sub-areas of the city centre for evening uses;

6.6.3 supporting **evening access** for users and growing city centre population;

6.6.4 Public Houses, Restaurants and Hot Food Takeaways Link the cultural strategy with economy policies to grow city centre activities and thus boost the evening economy and activity levels in the city centre. (*LDP policy 27 (7.50 NPF4:27)*).

6.7 Culture/destination activities/tourism for people to visit

There are a number of facilities which promote the city and its wider culture and history. These need to be developed and linked with supporting activities such as a busy evening economy. The Council's tourism strategy can also support this. (*LDP19: policy 7 (5.35-5.38) policy 8 (5.39-5.42) policy 27 (7.52) NPF4: 1; 12; 13;15; 26; 27; 30 (?)*) See **small museums**, Section 4.2.6.

This may be achieved through:

6.7.1 developing policies which support further **investment** in the sectors, and the delivery of additional facilities;

6.7.2 supporting additional opportunities for development and activity following the opening of **Eden Dundee**.

6.8. Education for people in the city centre

Education-related activities generate footfall, and this supports services, transport, and other city centre uses. The city centre is already fortunate to have two Higher Education facilities and a private secondary school. With a proposed increasing of the central area population, a primary school catchment facility should be investigated. (*LDP19: policy 18 (6.37); policy 19 (6.39); NPF4: 1;2; 9; 13; 18; 27*)

This may be provided through:

6.8.1 allocating a site for a **primary school** in the Waterfront area;

6.8.2 supporting **Dundee & Angus College** to redevelop the Wellgate Centre;



6.8.3 providing opportunity to build on the **Eden project**;

6.8.4 providing and publicising support for Dundee's universities.

6.9 Bus station for people arriving and travelling through

For many years there has been discussion about the best location for the bus station; it is in the east of the city, while the train station sits in the west. The opportunity to relocate the bus station to the west nearer the train station should be pursued. An obvious site is Waterfront site 2. Factors which are relevant include the moves in central retail focus from east to west; the opportunity to reduce the pollution in Seagate; the increased number of providers in the bus market; the much-needed integration of facilities for users; and adjacent interchange between services and modes of travel. It would be useful to encourage Stagecoach to move from the existing depot to Waterfront site 2; this would allow the existing depot for to become available for city centre housing. (LDP19: Policy 57(9.21-9.25); NPF4: 1; 2; 9; 13; 18; 27). See also Section 8.8.1.

6.10 Dundee's Waterfront Development

The city's thirty-year project is enormously important to Dundee's future, in terms of reviving its city centre, economic development, social fabric and its civic heart. DCT has published a comprehensive report calling for a renewed "conversation" about the very fundamentals of the project and how this far-seeing plan can be brought to fruition. See DCT's policy in **Annex**, Section 9.2, and the full report is on the DCT website:

<https://www.dundeecivictrust.co.uk/the-central-waterfront-a-discussion-document/> . (LDP19: policy 3(5.22); NPF4: National Development 10; 1; 2; 9; 13; 18; 27)

7. Sustainable Natural and Built Environment

7.1 Introduction

The vision of the local development plan needs to be expanded to include the concept of "**regenerative design**" within the natural and built environment – in other words, putting *more* biodiversity back into the city than already exists in it, to make up for significant biodiversity loss due to physical building footprints. NPF4 states in its biodiversity policy that "LDPs should protect, conserve, restore and *enhance* biodiversity in line with the mitigation hierarchy."

"**Green Infrastructure**" should be broadened to include streetscape, street planting and street trees, and a suitable guidance developed for how the Council should manage this part of their Green Network. The Dundee Green Network needs to be reconceptualised as applying to *all* streets in the city as well as existing identified networks, in order to ensure that all streets receive some form of biodiversity into them, to aid health and wellbeing (e.g. tree planting) as well as green resilience (e.g. rain gardens). Access to an expanded green network needs to be improved, together with enforced maintenance of all new and existing green infrastructure.



Planning for the city's energy infrastructure needs strengthening, rationalising and broadening – it is too siloed at present, resulting in randomised solutions instead of systemic ones. Conservation planning needs strengthening to protect the built heritage of the city.

7.2 Biodiversity conservation, enhancement and access

All existing green infrastructure, new planning applications and development should be assessed against

existing evidence in order to ensure that biodiversity is genuinely conserved and enhanced with appropriate **local community consultation**.

This can be advanced by:

7.2.1 extending existing datasets to **map the biodiversity** contained in all Dundee's parks, principal graveyards, 27 mile Green Route and soil quality within the city boundary, given that the council is trying to encourage food growing within the city. (NPF4 policies: 1, 3, 5, 15, 18, 20, 23).

7.2.2 developing a new dataset which maps all of Dundee's **historic rivers** and streams. Providing a map of all historic rivers and streams, including all culverts, makes it possible to consider initiatives which open up and naturally restore some sections of these rivers and streams when new developments take place, thus increasing biodiversity and reducing the risk of flash flooding. (NPF4 policies: 1, 3, 10, 14, 18, 20).

7.2.3 ensuring that developers produce appropriate **biodiversity plans**. They should also submit evidence of their status and completion one year after project completion, as part of any planning application. (NPF4 policies: 1,3, 4, 5,16, 18,20).

7.2.4 developing a city-wide **street tree strategy** (similar to the one developed by Sheffield City Council) and a programme of funded maintenance and replanting for the many thousands of street trees it owns. Street trees form a major component of mitigation and adaptation strategies which absorb carbon emissions and prevent flooding and overheating, which aligns with Dundee Climate Plan (2019) R. 1 in relation to this. (NPF4 policies: 1, 2, 3, 6, 14, 15, 16,18, 20).

7.2.5 making **Tree Preservation Orders (TPOs)** available for Council-owned tree stock as well as privately owned trees. The public should be able to demand a TPO for Council-owned trees, which should be independently vetted. (NPF4 policies: 1, 3, 6, 14, 15,18, 20).

7.2.6 ensuring that new housing developments have roads that are sufficiently wide to contain **street trees** and that trees are planted throughout the development. (LDP19 policy 35, NPF4 policies: 1, 2, 3, 4, 6, 14,15, 16,18, 20).

7.2.7 providing an appropriate quality and quantity of **open space/recreational space** following consultation with the local community. (NPF4 policies: 14, 15, 16, 18, 20, 21).

7.2.8 ensuring that developers carry out a thorough **environmental audit** of any site *before* the Council decides, in consultation with the local community, how much improvement and expansion of green infrastructure is required. This should ensure that any compensatory **green infrastructure** is provided in the community most directly affected, and not simply adjacent to it. (LDP19 policy 28, NPF4 policies: 1,2,3,4,5,6,14, 15, 16,18, 20, 21).



7.2.9 monitoring to ensure that over the period of the Local Development Plan there is no overall **net loss of greenspace** in the city. (NPF4 policies: 1,2,3,6,14, 15, 16,18, 20).

7.2.10 creating additional **Locally Important Nature Conservation Sites** (LINCS) to include all 24 parks with grasslands and pollinator banks e.g. Stobsmuir Park, Baxter Park, the former NCR fields at Camperdown Park, the Green Route, and the principal cemeteries. These must be based on evidence for all biodiversity studies

undertaken on these areas. It makes little sense to accord East Dock Street a LINC status, without also considering the other sites mentioned (LDP19: policy 33, NPF4 policies: 1,2,3,20).

7.2.11 not permitting development which has an adverse effect on a **European protected species**. It has long been recognized that developments which are given permission on the basis of socio-economic advantage but which harm other species, end up causing wider ecological problems (LDP19: policy 34, NPF4 policies: 1,3, 4).

7.2.12 linking **public transportation** routes to all existing and proposed green network routes, to ensure that any alternative route which may be proposed still has access points to public transportation. It is not enough to link only the Green Network to the Dundee Cycling Strategy (LDP19: policy 29, NPF4 policies: 1,13,14, 15,18).

7.2.13 Upgrading the A94 route to encourage vehicular through traffic that is not stopping in Dundee to avoid Kingsway, and thus improve the quality of the city's urban environment. See the DCT policy in **Annex Section 9.6**.

7.2.14 continuing the Council's support for existing public and private **allotments**, and where there is demand, encouraging the development of new sites.

7.3 Environmental Protection

The Council needs to show greater environmental vision by expanding the concept of individual flood risk assessments into a much broader framework for dealing with flooding across the whole city. Multiple design solutions may be based on broader **"Sponge City" concepts**, which use biodiversity enhancement to mitigate flooding risks.

It is unacceptable to rely on **SEPA predictions** which are based on past flooding rates and levels, rather than accurate forecasting based on the exponential change which has already been experienced in recent years. Flood defences have already proved to be inadequate: see for example the Brechin flood defence system which has been breached twice. They should not be relied on for future developments. Policies in this section need to be more risk averse.

This can be advanced by:

7.3.1 a presumption, without exception, against development on any **naturally defined flood areas** with proven flood history. No development should occur in areas with a one in 200 year probability of flooding, because these probabilities have already been vastly exceeded e.g. Dighty Burn, Eden River, etc. (LDP19 policy 36, NPF4 policies: 1,2,10, 22).).

7.3.2 a presumption against **artificial SUDS** solutions. These should only be exceptional, with preference given



to naturally based SUDS (*LDP19: policy 37, NPF4 policies: 1,2,3, 20, 22*).

7.3.3 ensuring that all new development or extension to an existing development will demonstrate that it is **actively enhancing biodiversity** in the area, and not merely avoiding an increased and unsatisfactory level of disturbance. An example could include the incorporation of a landbank with vegetation, and enhanced biodiversity, which would reduce the existing level of noise from an existing road (*LDP19: policy 39, NPF4 policies: 1,3,20, 23*).

7.3.4 a presumption against any development proposals which would lead to an increase in **air pollution**. Mitigation measures must be adopted to ensure that air pollution levels are kept to a regulated level. (*NPF4: policy 12, 23*).

7.3.5 the provision, according to the Waste Hierarchy, of **adequate re-use centres** as well as re-cycling centres. Such centres would encourage the re-use of furniture, building components, as well as raw materials, which is more sustainable than simply recycling them. Ideally, such re-use centres would be located next to small scale recycling facilities (*LDP19: policy 40; NPF4 policies 12, 15,18*).

7.3.6 expanding **waste management** to include re-use centres in addition to recycling centres, in partnership with the third sector and local communities, and including actual and potential neighbourhood sites for co-location of small re-use and recycling centres. This will avoid the need for extensive travel to use them (*LDP19: policy 4; NPF4 policies 11, 12, 183*).

7.4 Energy

Energy generating and storage facilities in the city need the development of a **more systematic planning strategy** which works across planning, sustainability, greenspace and housing teams within the Council. At the same time, a more inclusive approach is needed to encourage the development of a **more distributed and resilient energy network**. Solar power which produces electricity is a key part of the Scottish government's policy towards Net Zero energy delivery via renewables. It should be welcomed in Dundee as a "Sun City", which has an enviable southern aspect as a city from the Law downwards. Other renewable and net zero carbon energy initiatives should also be developed.

This can be advanced by:

7.4.1 welcoming proposals for all **small scale energy generating** facilities which are incorporated within buildings. PV Solar power should be incorporated into the roofing of existing heritage buildings as well as new buildings. (*NPF4: policy 11*).

7.4.2 ensuring that the **renewable energy generated** in buildings is made available to the local residents as well as owners and tenants within that building (*LDP19: policy 45; NPF4: policies 11, 15*).

7.4.3 developing **planning guidance** on how to assess the environmental and health and safety aspects of proposed Battery Energy Storage Systems (BESS). (*NPF4: policies 1,3, 11, 20*).

7.4.4 supporting **BESS applications** within the city boundaries only if they demonstrate that no other site is available and suitable, and that all environmental and health and safety aspects have been satisfied. (*NPF4: policies 11, 20*).



7.4.5 linking **heat networks** to waste heat sources or renewable energy sources, and not to any new incinerators (or combined heat and power systems based on other fossil fuels), on which the Scottish Government placed a moratorium in 2022. (NPF4: policies 11, 12, 18, 19).

7.4.6 phasing out and decommissioning the **Baldovie incinerator** as soon as possible, with a renewable energy replacement strategy put in its place. (NPF4: policies 11, 12, 18).

7.4.7 ensuring that **heat networks** are based on the systematic analysis of housing density levels rather than geographically random “clusters” of “opportunity”. (NPF4: policies 12, 18, 19).

7.4.8 ensuring that the delivery of heat networks is not favoured over other forms of renewable heat production such as ground source or air source heat pumps, where the latter are more immediate and more economical. (LDP19: policy 46; NPF4 policies 11, 12, 19)).

7.4.9 where heating and/or electrical systems are planned to be replaced, requiring all alterations, change of use, extensions and conversions of buildings to demonstrate that the proportion of the carbon emissions reduction standard will be met by **renewable technologies** (LDP19: policy 48; NPF4: policy 11).

7.4.10 allowing relaxations in **Conservation Areas** and for Listed Buildings, for suitable PV systems and air source heat pumps be installed. A balanced judgement will be needed comparing the need to preserve architectural integrity and setting with the need to reduce carbon emissions. In many cases, PV systems and ASHP systems can be installed relatively unobtrusively, to support the Dundee Climate Action Plan and its targets (Policy 49). (NPF4: policy 11).

7.5 Heritage and Conservation

Every building carries a significant amount of **embodied carbon** emissions. Demolition that necessitates a rebuild will simply generate more carbon emissions in the demolition as well as the construction of a new building, when the existing building could be repaired and repurposed without generating significant additional emissions. This should be avoided where possible.

This can be advanced by:

7.5.1 including a general presumption **against demolition** for all buildings unless evidence is provided to show the building is incapable of economic repair or economic re-use. (NPF4: policies 7, 9).

7.5.2 requiring developers to publicise proposals for demolition, which will allow the public to make **objections to notifications** of demolition; and to ask for the planning department to consider withholding permission to demolish a building, unless all reasonable avenues to re-use it, in part or whole, have been exhausted. Consider the option for a community asset transfer where this may be feasible. (NPF4: policies 7,15).

7.5.3 requiring a detailed justification and **conservation statement** for all proposed alterations. Reference should also be made to using the various Conservation Area guidance documents (LDP19: policy 51, NPF4 policy 7).

7.5.4 expanding **Gardens and Design Landscapes** to include *all* public designed landscapes within the city, including, for example, Magdalen Green, Stobsmuir Park, Finlathen Park, Douglas Park, Caird Park, Balgay



Cemetery, Dudhope Park, Eastern Cemetery, Western Cemetery, which should be linked to efforts to improve biodiversity (LDP19: policy 53, NPF4: policy 7) .

8. Sustainable Transport and Connectivity

8.1 Introduction

NPF 4 states that LDPs should promote a place-based approach to consider how to reduce car dominance. This could include low traffic schemes, shared transport options, designing speed controls, bus/cycle priority, pedestrianisation, and minimising space dedicated to car parking. Consideration should be given to the type, mix and use of development; local living and 20-minute neighbourhoods; car ownership levels; the accessibility of proposals and allocations by sustainable modes; and the accessibility for users of all abilities.

8.2 Safe and Sustainable Transport

Car travel is a prime cause of pollution and congestion. The practical issues relating to a transition to electric cars are likely to result in electric vehicle ownership not rising as fast as current government policy is trying to enforce. The implications for electricity demand by large scale electric vehicle use have not been fully thought out. Congestion remains the big issue for car travel, whether petrol or electric. It means that the location of housing, and the provision of viable alternatives to car travel, remain as important considerations. (LDP19: policy 54(9.13): NPF4: 1; 13; 15) See paragraph 5.2.1 above.

8.3 Cycling, Wheeling and Walking

As stated in national strategy, **active travel opportunities** for communities are to be pursued, but cycling in Dundee and in Scotland has major drawbacks as a mass travel mode, because:

- It is not a safe means of travel on busy public roads.
- There is a likelihood of strong winds and wintery road conditions. Many bicycle routes are not salted and some routes through parks and woodlands, (*e.g. the Miley*) have no street lighting, and are not safe for vulnerable people.
- Cycling is limited to reasonably fit people with some physical skill, as Dundee's topography, especially on a south to north axis, is very hilly, a height range of over 150 metres.
- The latest proposed schemes do not allow cyclists or wheelers to have safe passage from a clear and safe origin to a safe destination.
- There is a cost of ownership and maintenance which prevents a widespread network from ever being achieved or used.
- Simpler and cheaper upgrades are required, which will enable a complete and safe cycle journey from starting point to destination.

The Council should focus on **devising cycle routes** which are not on, or abutting, main traffic routes, and focus instead on relatively level routes. Steep north-south cycle routes should be delayed until a later stage. If the whole route can be identified, there is no reason why a succession of cheaper local upgrades could not be used



to achieve the eventual desired result. (*LDP19: policy 54(9.13); policy 56; NPF4: 1; 13; 15; 23*). See paragraph 5.2.1 above.

8.4 Bus and Coach Travel

Bus service provision is key to the city functioning, yet it must respond to a range of conflicting demands that are not aligned with policy objectives. The Council requires bus services to be attractive enough to encourage

more car users to choose bus travel, but priority must be given to service running time, comfort, frequency, and passenger weather protection at stops. (*LDP19: policy 54(9.13); policy 57(9.21-9.25); NPF4: 1; 2; 13; 15*).

For the past fifty years and more, housing developments, and more importantly groups of adjacent housing developments, have never been required to incorporate **good bus routings**. The Council house building in the 1950's and 60's assumed that buses could run on roads which were only 5.5 metres wide. In later housing developments it seems to have been assumed that everyone would have cars, and again, effective bus routes were not incorporated.

Bus operators appear to favour routes which go slowly and indirectly through successive housing areas, presumably to get as close to customer home locations as possible. This practice minimises the number of routes and vehicles needed to provide these services. Journey times are lengthened, which becomes an unsuitable alternative to car travel. It means that these arrangements serve only the non-car owning sector of the population that must use bus services, regardless of how unattractive those services might be. The current arrangement has moved too far away from **journey directness** and quicker journey times.

The Council wants all houses in Dundee to be within **400 metres** of a viable and attractive bus service, which will help to fulfil the principle of the 20-minute neighbourhood. This aim is not being achieved, even in newer developments that have been built since this objective was set. Examples include the new Craigowl Law Estate near Clatto, and the Western Gateway. How may a bus service be devised that will encourage bus rather than car travel? A few buses per day at peak periods certainly will not be sufficient.

Bus operators must address the poor **ride quality of their bus fleets**. Even the new buses have hard suspension which, exacerbated by bumpy road surfaces, makes travel by bus very uncomfortable. Priority should go to re-surfacing bus routes and either removing buses from roads with speed bumps, or modifying the speed bumps. Turnberry Avenue is an example. Services have been taken off Rosemount Road, which is fast, wide and smooth, and instead put onto Turnberry Avenue which has full width speed restriction platforms, rough surfaces, and a narrow junction with Macalpine Road which restricts bus access.

Bus passenger shelters are the responsibility of the City Council, but they are far from ideal and have been vandalised in many peripheral areas. If the bid to achieve the changes that we propose is to succeed the Council must not give up. In bus shelters, alternative glazings such as Perspex and Lexan may have their weaknesses, especially being vulnerable to graffiti, but they are much lighter and easier to install and will not shatter so readily.

8.5 Road Congestion

Congestion is a main issue and has its biggest effects in the peak periods. Cross-city routes from east to west,



and the A90 trunk road, are main stress areas. Upgrading the A94 would serve to reduce congestion on Kingsway for vehicles and buses crossing it at a roundabout or traffic lights. See Section 8.8.3. The most effective measures that the Council could pursue to cope with road congestion pressures, and to secure policy improvements, are suggested with amendments to LDP19 policy 54: (LDP19: policy 56(9.20); NPF4: 1; 2; 8; 9; 15)

8.5.1 use additional **on-street parking restrictions**, and **bus-only lanes**, to allow buses to pass through regular delay points.

8.5.2 form a combined pressure group together with Angus, Aberdeen city, and Aberdeenshire Councils, to lobby Transport Scotland and the Scottish Government for measures to resolve congestion on the **six key A90 junctions** on Kingsway: Swallow, Myrekirk, Strathmartine, Old Glamis Road, Forfar Road and Claverhouse, including bus-only priority schemes for the Strathmartine and Old Glamis Road roundabouts.

8.5.3 **refuse further greenfield housing** on the perimeter of the city, and encourage new housing in failing retail areas of the city centre, and on derelict sites in the inner areas of the city. See Section 7 above.

8.6 Dundee Airport

Dundee should support the continuation of the **London Heathrow service** and continue its grant support. The appearance of Dundee on destination boards at Heathrow is important marketing for the city. (LDP19: policy 55 (9.16); NPF 18; 26)).

8.7 Parking

There are very narrow streets in long-established residential areas, early post-war Council housing estates and its Victorian tenement areas, where car parking is very inadequate, with no chance of significant improvement due to both physical and financial restrictions. In some cases **access to houses by emergency vehicles** is now compromised, especially in the evenings. Any kerbside charging of electric vehicles will make this worse, by compromising the safety of footpaths, (though there are solutions) and there may be conflict over access to parking spaces beside charging points. The otherwise sensible ban on pavement parking has compounded the issues of parking and access in many areas. (LDP19: Policy 56(9.20); NPF4: 1; 8; 15)).

A further issue is the **parking of large commercial vans** on street overnight, sometimes compromising bus routes. This commercial practice should not be allowed to disadvantage other residents, bus routes, or access by emergency vehicle. There is an argument for the banning of the overnight parking of commercial vehicles in housing areas.

The council should consider implementing **controls in residential areas** to address these matters, which will ease flow and accessibility through residential areas. See paragraph 5.2.2 above.

8.8 Transport Interchanges

8.8.1 Bus Station Need and Siting

There is evidence that the **regional bus/coach station** in Seagate, Dundee, is not in the right place. A number of new coach companies have taken to operating from city centre streets at unofficial stops with no weather protection. **Site 2 on the Waterfront** looks to be a better place for a regional bus station, not least because it is



in a more attractive and central part of the city centre, adjacent to both the railway station and most of the city's local bus services on Nethergate and Whitehall Street. There is ample and convenient space for buses and passengers, and out of service bus storage and maintenance could remain at Seagate. City internal bus services may work best from their current stances on city centre streets, because that is where the passengers want to be. The Council must **negotiate with Stagecoach** to have the bus station moved to Site 2. See also Section 6.9. (LDP19: policy 57(9.21-9.25); NPF41; 2; 9; 13; 18; 27).

8.8.2 Rail

Rail services are particularly important to Dundee's economy. The rail station is adjacent to the main central retail area, major tourist attractions, and large hotels and walking distance from the bus station. The city's priority for better railway infrastructure is the **line to Edinburgh** that gives access to much of the Scottish Government and business, and also carries LNER trains directly to London. Speed improvements on the Dundee-Edinburgh railway line through Fife are not possible. However, **electrification and modern signalling** would shorten journey time on longer routes, by better acceleration and train control.

Network Rail's plans are to electrify the north line from Edinburgh through Perth, as far as Montrose, by 2035. The type of electrification that should be employed is **discontinuous overhead electrification**, where trains use overhead wires, diesel and battery power at different times. These have already been developed and are in service. It would be more reliable, much less disruptive, and far less expensive to acquire and run such trains, thus saving a number of bridges along the route. (LDP19: policy 57(9.21-9.25): NPF4:1; 2; 13; 15)

8.8.3 Regional: City Bypass on A94

The Scottish Government is unlikely to fund the by-passing of Dundee by the construction an entirely new road: there is not the support, financially or environmentally, for such a project; but it could simply give Perth and Kinross Council discretionary grants to **bypass the four Perthshire villages** through which the A94 runs, for a tiny fraction of the cost of any other solution. That solution would reduce the traffic congestion on Dundee's Kingsway, as well as reducing the volume of traffic passing through the city. A proportion of through traffic would use this alternative route. This will avoid the need for substantial, costly and disruptive upgrading works on A90 Kingsway.

The City Council should lobby the Scottish Government on this matter and pursue it through the TACTRAN partnership as a priority for the regional and national interest as well as for Dundee. See DCT's policy in **Annex** Section 9.6. (LDP19:new policy/proposal; NPF4:1; 2; 13)

9. Annex



9. Annex

DCT's published Policies

These policy documents will be submitted separately to accompany DCT's response to the Call for Ideas.

9.1 Expanding Dundee's Boundaries

Despite being Scotland's fourth-largest city, Dundee is the country's smallest local authority by land area. Dundee Civic Trust considers that the city's boundaries are too small and limiting for efficient government. There are conflicts in education, planning decisions, transport planning, housing policy, social work and even bin collections which must be resolved. The neighbouring local authority areas of Angus and Perth & Kinross contain a significant amount of housing and commercial development immediately adjacent to the city boundary. This negatively affects the efficient operation of Dundee City, without contributing to its council tax income or business profits. It also denies the residents of those places the opportunity to vote in the local elections for the urban area to which they are physically connected.

DCT believes that the city boundaries should be expanded to come closer to the area covered by the former City of Dundee District under regionalisation between 1975 and 1996. Immediately adjacent built-up villages such as Monifieth and Invergowrie should be incorporated, along with the surrounding areas. Here is the link to the article in the DCT website: <https://www.dundeecivictrust.co.uk/the-case-for-expanding-the-dundee-city-boundary/>

9.2 Rethinking Dundee's Waterfront

Dundee's Waterfront development area is approaching thirty years since its inception. Dundee Civic Trust has been concerned that the city's central area is blighted due to the seven remaining key sites that have remained undeveloped for this whole time, empty and neglected, and surrounded by ugly hoardings. There seems to be little progress.

We believe it is the right time to offer a new approach to the development of this area, and we are delighted to present a new policy discussion document which outlines a potential way forward, and which we hope will inspire and stimulate wider discussion and fresh thinking. Here is the link to the article in the DCT website: <https://www.dundeecivictrust.co.uk/wp-content/uploads/2025/06/DCT-Proposals-for-Central-Waterfront-Area-08.06.2025-final.pdf>.

9.3 Removing VAT on repairs to existing buildings

At present VAT of 20% is charged on all materials and labour employed to repair or upgrade all second-hand buildings, but no VAT is charged on the cost of new buildings.

The Scottish Government's National Planning Framework 4 (NPF4) indicates a preference for reuse, adaptation and recycling in relation to existing buildings rather than demolition and new build, so it seems perverse that there is a disincentive to do so. It is important to encourage the re-use of old buildings.

DCT considers that environmental and social needs require as much encouragement as possible to reuse existing buildings. The present arrangement is clearly insufficient, and the Trust's view is that repairs to all existing buildings



should be zero rated for VAT. Here is the link to the article in the DCT website:

<https://www.dundee-civic-trust.co.uk/vat-on-repairs-on-existing-buildings/> .

9.4 Recommending Good Housing Design

DCT, working with the Dundee Institute of Architects (DIA) have published recommendations for housing design, whose aims are to achieve better design of housing in the city and to develop a template for developers, taking into account the need for compliance with the National Planning Framework 4 (NPF4). This report contains recommendations for housing design standards which DCT and DIA wish to see included in the review of the Local Development Plan 2019 (LDP).

Twenty nine recommendations were submitted to Dundee City Council planning department in 2024. The first three recommendations are fundamental to all proposed housing developments and their wider context. The remaining 26 relate to the basic principles of NPF4, which must be adopted by all Local Development Plans and applied in consideration of planning applications: transition to net zero emissions; conserving and recycling assets; local liveability; compact urban growth; and rebalancing development to create opportunities in areas of past decline whilst managing development in areas of high demand. Here is the link to the article in the DCT website:

<https://www.dundee-civic-trust.co.uk/dundee-housing-design-workshop-june-2023/>

9.5 Recommending a Dundee Design Review Panel

Dundee Civic Trust proposes the establishment of a Dundee Design Review Panel to promote high-quality, sustainable and design-led development across the city. Dundee is a UNESCO City of Design, but it lacks an independent multidisciplinary mechanism for reviewing the design of planning applications. This proposal adapts the Edinburgh Design Panel model and envisages collaborative development with Dundee City Council, Dundee Institute of Architects, UNESCO City of Design Dundee, universities, professional bodies and community, aligned with National Planning Framework 4 and its design objectives.

The task of such a panel would be to prioritise developments with long-term impact, including major housing, strategic sites such as the Waterfront, Kingsway, eastern and western growth areas, and the Eden corridor, city-centre infill and tall buildings, civic facilities and proposals which may affect sensitive heritage areas. Reviews would occur early in the design process, with developers submitting materials in advance and receiving written reports which would be published before applications are lodged. Developers would be required to demonstrate how they have responded to panel advice or to justify departures.

The panel would provide independent expert advice at the pre-application stage with the aim of helping design teams to strengthen proposals, reduce planning risk and improve outcomes while complementing the statutory planning process. It would operate under transparent governance: chaired by a senior planning officer, supported by a Council officer, and composed of voluntary multidisciplinary members from architecture, landscape, planning, heritage, transport, sustainability and community. Meetings would be held monthly or bimonthly, reviewing one to three



schemes per session.

A pilot exercise would refine the policy before the panel is formed. Here is the link to the article in the DCT **website**:

[A Dundee Design Review Panel – Dundee Civic Trust](#)

9.6 Removing North East Traffic from Dundee’s Kingsway and Forfar Road

9.1 Introduction

The A90 corridor through Dundee, particularly Kingsway and Forfar Road, faces severe congestion, delays, pollution, and economic and social costs. The city's physical division caused by traffic and a major trunk road further exacerbates these issues. To alleviate these problems, but DCT advocates this as the most effective and viable solution.

9.2 Proposed Solution: Upgrading the A94

DCT supports the modest upgrading of the A94 route from Perth to Forfar as the best alternative to reducing traffic on the A90. The advantages of this option include:

9.3 Route Characteristics

- The A94 is an underutilised single carriageway road with good construction standards.
- The route is largely in open countryside, with exceptions for sections passing through villages such as Balbeggie, Burrelton, Meigle, and Coupar Angus.
- The road is mostly flat and straight, offering easy overtaking opportunities, minimal congestion, and improved safety for heavy goods vehicles.

9.4 Integration with Existing Infrastructure

- The Cross Tay Link Road, opened in 2025, provides direct connectivity to the A9/M90 routes, and thus enhances accessibility. It would be sensible, given its cost to use the A94 route to its maximum potential.
- Travel distances for HGVs will be similar via the A94 compared to the A90, but the A94 offers a smoother and more fuel-efficient drive.

9.5 Advantages of upgrading A94

9.5.1 Immediate Advantages

- The A94 is already, to some extent, a viable alternative through route without requiring additional expenditure.
- A proportion of traffic is expected to divert from the A90 to the A94, particularly during peak periods.
- Roadside signage improvements will further encourage the use of this alternative route.



9.5.2 Long-Term Advantages

- The creation of an alternative route enhances resilience in case of road closures due to weather or accidents.
- The A94 is less susceptible to winter conditions such as snow and ice due to its low elevation and lack of steep inclines.
- Traffic increases on the A94 will necessitate the provision of bypasses for the affected villages, which can be built cost-effectively.
- Completing this option requires minimal expenditure compared to other potential solutions.

9.6 Government Support and Implementation

- Transport Scotland could classify the A94 as a trunk road, facilitating its development.
- If trunking is not feasible, the Scottish Government could authorize capital funding for necessary upgrades.
- Completing minor bypasses along the A94 would create a continuous trunk route, enhancing traffic flow.

9.7 Conclusion

Dundee Civic Trust strongly endorses a policy for the A94 upgrade as the most effective solution for diverting traffic from Kingsway, improving the through traffic flow, and enhancing Dundee's urban environment.



Dundee Civic Trust is a Scottish Charitable Incorporated Organisation, established in 1973
For information about Dundee Civic Trust visit our web site at www.dundee-civic-trust.co.uk