



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LDP19 had many useful and interesting policies, but is now well out of date: several of the significant aspirations have not been achieved, and, importantly, National Planning Framework 4 (NPF4) came into effect in 2023, altering and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.



Dundee Civic Trust is a Scottish Charitable Incorporated Organisation, established in 1973
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