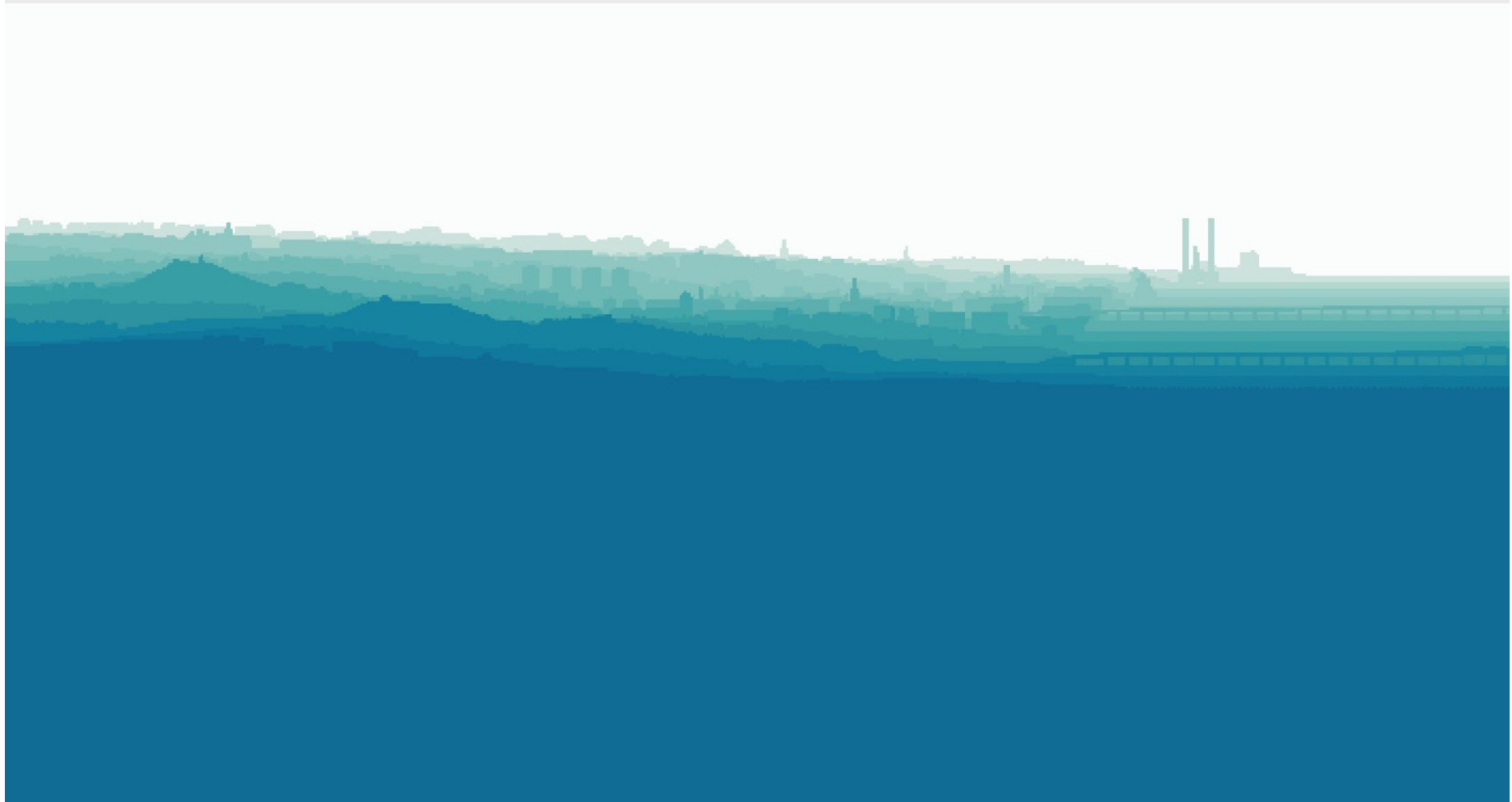


Dundee City Council

Local Development Plan 2

Main Issues Report Consultation Responses Schedules March 2016



Main Issue / LDP1 Policy / Other Issue (reference & heading)	Main Issue 1 – Safeguarding of Employment Land	
Officer:	AH	
Body or person(s) submitting a response (including unique reference number):		
3 – Adaya Ltd	30 - Scottish Enterprise (commenting as Key Agency)	54 – Forth Ports
9 – Broughty Ferry Community Council	36 – CWP (adj. Aldi site)	55 – Scottish Enterprise (commenting as landowner)
13 – Scottish Government	40 – Gladman	58 – Rapleys
21 – National Grid	43 – Ristol	60 – I&H Brown
23 – Bruce Linton (Stewarts Cream of Barley)	52 – SEPA	61 – Tactran

1. Summary of the Comments to the MIR	
Support Preferred Option	
9 – Broughty Ferry Community Council	Support.
13 – Scottish Government	We recognise that the proposal for no new allocations is based on the latest Employment Land Audit which indicates that there is well in excess of the five years effective land supply. We support the reasoning behind the desire to resist pressure for other uses such as housing and retail and in particular the desire to provide for a broader energy sector. We are content that employment land identified through NRIP is retained in the preferred option.
30 - Scottish Enterprise (commenting as Key Agency)	SE supports the preferred option, in principle, acknowledging the short timescale since the adoption of the extant Local Development Plan but suggests that Dundee City Council gives detailed consideration to and assessment of existing allocations to ensure they are realistic sites for employment development and are not subject to any form of constraint which will render the site undevelopable (for example development viability). In such circumstances, SE also suggests that consideration be given to modifying existing allocations to allow for alternative or mixed land uses which may secure the delivery of the site for employment purposes, and in which case will positively contribute to the sustainable economic development of the City.

	SE also requests that consideration be given to ensuring that the Proposed Plan policies allow for a range of land uses which maximise employment opportunities (for example private hospitals and nursing homes), without restricting uses to Classes 4-6 only.
43 – Ristol	Ristol Consulting Ltd support the continued allocation of Wester Gourdie Industrial estate for industrial class 4,5 & 6 uses.
54 – Forth Ports	Notwithstanding the options identified within the MIR, Forth Ports seeks to ensure that sufficient employment land is available to support existing and emerging business sectors including energy (both oil and gas and renewables). It is noted that 'Figure 3: LDP1 Economic Development Areas and TAYplan Strategic Development Areas' identifies the Port of Dundee as a Principle Economic Development Area. Forth Ports supports this continued designation and considers that the wording of Policy 1: Principal Economic Development Areas provides a clear and appropriate framework for development associated with the Port, reflecting its broad and employment and industrial nature.
55 – Scottish Enterprise (commenting as landowner)	<p>Fully support the safeguarding of employment land, in order to attract and provide opportunities for new business in Dundee.</p> <p>The upper plateau landholding at Balgarthno extends to approximately 10.32 HA, this lies within the Principal Economic Development Area in the currently adopted Dundee LDP 2013.</p> <p>SE support the continued allocation of their landholding for employment purposes and concur with the Dundee City Council analysis that sites, such as this may offer opportunities for the renewable sector. This will ensure that a range, size, location and quality of sites are available to meet current and future needs of new and existing businesses within Dundee over the LDP 2 period.</p> <p>SE agree with the Preferred Option for Issue 1 of the MIR that their upper plateau landholding at Balgarthno, be retained and safeguarded for future employment uses over the LDP 2 plan period.</p>
61 – Tactran	Tactran strongly supports the Preferred Option as concentrating on existing allocations will encourage developments in locations which can accessed by a variety of travel modes and reduce dependence on the private car.
Support Alternative Option 1	

3 – Adaya Ltd	<p>Site specific submission seeking to remove site in south west Dunsinane from Principal EDA to housing use. The proposal is for submission to the local plan and the summary for its inclusions is as follows:</p> <ul style="list-style-type: none"> • The building is now in poor, deteriorating, condition and has an unusually low ceiling which is impractical for modern industry. • There is currently not a demand for industrial units in the area. • Whilst the site is currently marked as an Economic Development Area there is a clear separation between the development site and the remainder of the Industrial Area via an existing road (Broomhill road on East). This will further be re-enforced via heavy planting/screening. • There are residential plots to the immediate south and west of the application site. • The proposal is well laid out and creates an attractive development which will comply with the Dundee Local Plan with regards to housing design, amenity, privacy etc • The scheme is arranged around central communal amenity space which is overlooked by all the houses to create a pleasant safe outdoor space for shared use by the residents. • There is a range of accommodation types and sizes allowing for a mix demographic
21 – National Grid	<p>The Dock Street Gas Holder Site is allocated as a Principal Economic Development Area with alleged potential for development for renewable energy engineering. However it has no ready accessibility to the Docks and lies outwith the Enterprise Zone which will further deter investor interest as will the clearance and remediation costs.</p> <p>Redevelopment for employment use is not economically viable. A more positive and realistic strategy should be pursued which will remove the employment allocation from TGHS to replace it with a retail allocation. See Appendix 7: Land Values DTZ which is still broadly applicable.</p>
23 – Bruce Linton (Stewarts Cream of Barley)	<p>The site at Stewart’s Cream of the Barley forms part of the Mid Craigie Industrial Estate – designated as General Economic Development Area in LDP1, however, the Estate is not attracting new inward investment and the part of the estate subject to this submission is currently under-occupied. It is no longer commercially viable for employment use.</p> <p>A site-specific representation is attached as a supporting document and identifies that the site’s planning characteristics lend itself to redevelopment for housing.</p> <p>It is relevant that Persimmon Homes Ltd is supportive of redeveloping this site for housing, having agreed terms with the landowner. This proven market demand for residential development by a national housebuilder substantiates that this site is capable of delivering effective new homes in a suitable and sustainable location in the City.</p> <p>LDP2 has a statutory planning requirement to identify and safeguard at least five years supply of employment land. However, there is in fact an extremely generous supply of employment land in the City compared to the annual take up rate, and therefore significantly more than 5 years supply available. The reallocation of some of the existing supply to other uses would not therefore undermine the 5 year supply of employment land in the</p>

City.

The Council's 2015 Employment Land Summary Figures confirm that out of the 159.38 ha of available marketable employment land, no land was taken up. In 2014, only 0.69 ha was taken up of the 155.30 ha available. In 2013 out of the 180.95 ha of available land, only 1.87 ha was taken up; in 2012 out of the 183.77 ha of available land, only 0.94 ha was taken up and in 2011 out of the 184.38 ha of available land, only 1.57 ha was taken up.

The LDP2 Monitoring Statement confirms "The Employment Land Audit indicates that Dundee has a generous supply of vacant employment land available for inward investment and that uptake of land during the past few years has made no significant impact on the overall amount of land available."

In addition, Dundee City Council's publication in June 2015 on Dundee's Economic Profile also confirms that Dundee has a comparatively high level of supply nationally stating "The availability of Employment Land in Dundee City between 2013/14 was higher than the Scottish national average and amongst the highest for any Local Authority area. The availability of Employment Land for Dundee City for 2013/14 was 75.8%, with the Scottish National Average at 17.7%."

The loss of 2.9 hectares of employment land, at Stewarts Cream of the Barley, would not undermine the requirement in Policy 3: A First Choice for Investment of the Proposed TAYplan to provide for a 5 year supply. The removal of the site from the employment land supply equates to a loss of only 0.018% of the supply, which will have negligible impact.

It is acknowledged that in addition to ensuring a sufficient supply of land, SPP also requires that LDP2 allocates sites that meet the diverse needs of the different sectors and sizes of business, however, it is clear from Figure 3: LDP1 Economic Development Areas and TAYplan Strategic Development Area, included on page 17 of the MIR that this is also achieved across the City, in terms of the variety of employment land available across the City.

It is also noted that, as stated on page 15 of the LDP2 MIR, the Reporter concluding on the examination of the Local Development Plan (LDP) in 2013 that "... if allocated sites do not show continued demand for economic development then it would be open to a future review of the proposed plan to consider an alternative use."

In further support of the above, LDP2 MIR acknowledges that paragraph 103 of SPP states that "Where existing business sites are underused, for example where there has been an increase in vacancy rates, reallocation to enable a wider range of viable business or alternative uses should be considered, taking careful account of the potential impacts on existing businesses on the site".

Land at Stewarts Cream of the Barley is no longer meeting current market requirements and the site is underused with high vacancy rates. It is intended that existing tenants will benefit positively from being relocated to more modern premises on other existing employment land within the City within the ownership of our client.

	<p>The de-allocation of this small area of land from employment use will not undermine the employment land supply or detract from the range and choice of employment land across the City, but rather its allocation for residential development will secure the delivery of effective new housing in a sustainable location supported by a national housebuilder.</p>
36 – CWP (Aldi site)	<p>The site to the East of Myrekirk Road is identified in the Main Issues Report as a Principle Economic Development area.</p> <p>Whilst this may be true of the vast majority of this area, the land specifically identified on the attached location plan is occupied by an ASDA foodstore and planning permission has been granted, under reference 15/0404/FUL, for another smaller foodstore. These retail uses are not business and employment uses and therefore should be acknowledged within the Development Plan (see later comments).</p> <p>The ASDA and recent approval also leaves a residual part of the site, which spatially relates to the two retail units (1 existing and 1 consented). In this context it would be illogical to promote this land for business and industrial use as it will be separated from the main body of the principle economic development area.</p> <p>This site identified on the enclosed location plan should therefore be excluded from the Principle Economic Development Area.</p>
40 – Gladman	<p>The MIR states that Dundee has in excess of the five year effective land supply required to be safeguarded for employment land, therefore no more land should be allocated for this reason. As a large quantity of allocated employment land remains derelict, there should be incentives to release proportions of this employment land to combat the housing shortage within Dundee. Allocating employment land for residential will enable Dundee to maintain a 5 year effective housing land supply.</p>
58 – Rapleys	<p>For the reasons that we explain in our written representation promoting and supporting the Main Issue 2 Preferred Option for Blackness GEDA, we do not fully support the Council's preferred option as this refers to retaining and safeguarding within existing General Employment Areas – assume Blackness is one.</p> <p>As we have recommended that a new policy approach, which is suggested and preferred by the Council, for Blackness GEDA, to be delivered by a masterplan – and which in our view needs to take some challenging decisions about the use and re-use of vacant or semi vacant buildings, and the evident pressure for change of use not compliant with the existing Policy 3 (protecting such areas to employment uses Class 4,5,6) we believe the Alternative Option 1 proposed in this Main Issue is acceptable in such an exception as Blackness where it is already acknowledged there are some fairly unique circumstances at play which have resulted in the Council making a positive suggestion for change within Main Issue 2.</p>
60 – I&H Brown	<p>The sole emphasis of the preferred option is on safeguarding employment land rather than supporting economic growth in the city. Given the generous employment land supply in Dundee, Dundee City Council should remove land from the employment land supply and amend the relevant policy to allow non-employment redevelopment on sites within General Economic Development Areas, where certain criteria are met.</p>

This approach is supported by national and strategic planning policy and does not undermine the overarching economic strategies of Scotland nor of Dundee.

I&H Brown also supports the amendment to the existing Policy 3 General Economic Development Areas to state that redevelopment of these sites for non-employment uses will be acceptable subject to certain criteria. These criteria should mirror those used by City of Edinburgh Council to control such developments within the Second Proposed Plan of its Local Development Plan. Policy 9 of the Second Proposed Plan states:

“Proposals to redevelop employment sites or premises in the urban area for uses other than business, industry or storage will be permitted provided:

- a) the introduction of non-employment uses will not prejudice or inhibit the activities of any nearby employment use;
- b) the proposal will contribute to the comprehensive regeneration and improvement of the wider area;
- c) and, if the site is larger than one hectare, the proposal includes floorspace designed to provide for a range of business users.

Planning permission will be granted for the development for employment purposes of business and industrial sites or premises in the urban area.”

I & H Brown would strongly challenge the assertions in relation to a lack of policy support for Alternative Option 1 and negative impact that Alternative Option 1 would have on the employment land supply. There is considerable support, and certainly no barriers, at the national or strategic plan level, to the removal of a small number of sites from GEDAs.

Alternative Option 1, with the proposed amendments by I&H Brown, will allow Dundee City Council to better respond to economic opportunities, make more efficient use of land for which there is no proven employment demand, and facilitate the creation of new jobs where opportunities arise. There is explicit support for Alternative Option 1 within the SPP which encourages the reallocation of underused employment land.

There is no conflict between the approach advocated by the Scottish Government in the SPP and the support for cities as economic drivers as advocated by the Scottish Government within NPF3. It will be a matter for Dundee City Council as to how it selects and deallocates vacant sites from its employment land supply. However, principle of doing so is in line national policy.

The Main Issues Report states that there is now emerging demand from the broader energy sector, such as the oil and gas industry. It is I&H Brown’s position that the sites being targeted at the renewables sector in the adopted LDP, i.e. those within PEDAs, are those that are also most suited for the wider energy sector. Therefore, there may be an argument for resisting the removal of such sites from the employment land supply.

The adopted LDP does not attach the same significance to GEDAs, which are primarily for small business use.

In limiting the sites to be deallocated to those in GEDAs, Dundee City Council can ensure that the emerging LDP is in alignment with the emerging Strategic Development Plan, as well as broader economic strategies.

Furthermore, the targeted and selective removal of vacant, unproductive land within GEDAs will not have an impact on Dundee City Council's ability to maintain a 5 year employment land supply. Nor will it impact on its ability to offer a diverse range of sites to respond to requirements. Ryden has submitted an Employment Land and Property Market Review alongside this representation to demonstrate why this is.

Key facts that emerge from this study are the following:

- Dundee City Council's 2014 Employment Land Survey shows there is 180 ha in the city's employment land supply. 153.3 ha (86% of total) of this is immediately marketable as it is unconstrained or has minor constraints.
- Take up of employment land in Dundee is very modest, with an annual average take up of 1.09 ha over the last 4 years. This figure is supported by an analysis of land sales transactions over the last ten years.
- The above figures equate to a 142 year's supply of employment land in Dundee.
- The employment property market has staged a recovery since the 2008/9 recession. However the city has a significant stock of existing employment premises. Market demand comes primarily from smaller occupiers.
- A combination of smaller occupiers, available stock and returns on investment not covering costs (i.e. lack of development viability) mean that new development will only be delivered for specific occupiers to buy or lease rather than for offer to the general market.

The loss of a limited number of sites from Dundee's 142 year employment land supply will not prevent Dundee City Council from maintaining its 5 year housing land supply, in accordance with TAYplan. Nor will it threaten the diversity of Dundee's employment land offer given the size and range of its supply.

Alternative Option 1, as amended by I&H Brown within this submission, cannot be said to be incompatible with the Strategic Development Plan. Indeed, releasing underused, brownfield sites for redevelopment where there are concrete proposals on the table will result in increased investment and growth in the city without threatening the 5 year housing land supply or the nature and quality of that supply.

Cites Main Issue 2. It is frustrating that Dundee City Council recognises the benefit of this more flexible approach for a city centre site where there are vacancies, but no for other GEDAs such as that in which the former ABB site at Kingsway East.

2. Collated Comments	3. DCC Initial Response	4. Further Consideration
<p>Comment was evenly split between the preferred option and alternative option 1.</p>	<p>Noted.</p>	
<p>Scottish Enterprise (commenting as Key Agency), Scottish Government and Forth Ports noted that there is a substantial supply of employment land, and that the preferred approach ensures that a range, size, location and quality of sites are available to meet current and future needs of new and existing businesses within Dundee over the LDP 2 period, particularly through the provision of larger sites to meet the needs of a broader energy sector.</p>	<p>Noted and response comments are consistent with the preamble to Main Issue 1.</p>	<p>This support for the preferred option will be taken forward into the Proposed LDP.</p>
<p>Scottish Enterprise (commenting as landowners), Gladman, I&H Brown, and Bruce Linton noted the substantial supply and the recent low average uptake, with I&H Brown suggesting that this equates to a 142 year supply of employment land. Therefore removing a small site (3ha) from the EDAs would have a negligible impact on the employment land supply. Suggestion that existing allocations should be modified to alternative uses that also contribute to economic development.</p>	<p>As set out in the preamble to Main Issue 1 it is acknowledged that Dundee does have a substantial supply of employment land, but that it is varied in terms of size, location, quality and accessibility. This variety is necessary to ensure that the city can respond to quickly meet the requirements of this evolving broader energy sector as it competes with other locations to accommodate these new opportunities. To do this Dundee will need a generous and varied supply of land across the city to provide for the potential needs of new and developing sectors. It must also retain the potential to accommodate general and specialist employment needs.</p> <p>It is acknowledged that the reallocation of the EDAs to effectively release a site for other uses would not in isolation have a significant impact on the employment land supply, however in the context of maintaining a varied supply across the city the cumulative impact of deallocating several small sites may detract from the variety.</p>	<p>Recognising that there may be some sites that for site specific reasons will not be developed within the Plan period, further consideration will be given to the effectiveness of sites; whether they should form part of EDAs and what impact their reallocation would have on the overall quantity and quality of employment land supply.</p>

<p>Bruce Linton noted that the Reporter concluding on the examination of the Local Development Plan (LDP) in 2013 stated that "... if allocated sites do not show continued demand for economic development then it would be open to a future review of the proposed plan to consider an alternative use."</p> <p>In some cases there is evidence of low or no demand for vacant sites and vacant buildings, and underuse of some buildings. These sites and/or buildings could be used for alternative uses which would attract investment and growth.</p>	<p>The Reporters comments were noted in the MIR where it was also acknowledged that uptake of employment land has been very low in recent years. This low uptake is an effect of the economic downturn being experienced across Scotland.</p> <p>Some 70 hectares of employment land was removed as part of the preparation of LDP1. Given the short period of time that has passed since the adoption of LDP1 it is considered premature to consider alternative uses for the employment and supply. Furthermore there has not been a significant increase in vacancies since LDP1 was adopted.</p> <p>Instead of releasing employment land for alternative uses the strategy of LDP1 and proposed strategy for LDP2 is to ensure that Dundee is ready to quickly respond to the needs of its current and future employers, particularly the needs of the broader energy sector.</p>	<p>Recognising that there may be some sites that for site specific reasons will not be developed within the Plan period, further consideration will be given to the effectiveness of sites; whether they should form part of EDAs and what impact their reallocation would have on the overall quantity and quality of employment land supply.</p>
<p>Adaya, National Grid, Bruce Linton, CWP, Gladman and I&H Brown highlighted that the effectiveness of employment sites should be considered. In some cases sites are not commercially viable with two responses highlighting specific buildings that are no longer suited to modern business requirements. Alternative uses proposed were largely housing, retailing or leisure uses.</p>	<p>The points regarding the effectiveness of employment land is noted. SPP does not refer to the effectiveness of sites; instead it discusses several factors including whether sites are serviced or serviceable within five years, and where there has been an increase in vacancy rates to consider reallocation to enable a wider range of viable business or alternative uses.</p> <p>These points were made in relation to specific sites and the Council will consider the justification provided and whether these particular sites and any others should continue to form part of the employment land supply and what alternative uses could contribute to the spatial strategy.</p> <p>In the context of the wider employment land supply, there has not been a significant</p>	<p>Recognising that there may be some sites that for site specific reasons will not be developed within the Plan period, further consideration will be given to the effectiveness of sites; whether they should form part of EDAs and what impact their reallocation would have on the overall quantity and quality of employment land supply.</p>

	increase in vacancies since LDP1 was adopted.	
<p>I&H Brown - Should adopt a more flexible approach to the policy to allow alternative uses perhaps adopting and widening the approach suggested in Main Issue 2 for the Blackness GEDA. No suggestion was made as to what these alternative uses may be. Reference is made to a policy approach in Edinburgh where change of use from industrial / commercial land uses are permitted subject to certain criteria.</p>	<p>The approach suggested in Main Issue 2 for the Blackness GEDA is an attempt to specifically address the needs of that unique part of the city. Factors such as high levels of vacant or underused land / buildings, built heritage, proximity to city centre and universities and a mix of existing uses within Blackness led to the identification of an opportunity to bring about change within this GEDA. Other GEDAs do not have the same weaknesses and opportunities as Blackness and the approach suggested in MI2 would not be appropriate.</p> <p>Policy 3 already allows some other 'wider industrial uses' such as car showrooms within GEDAs subject to criteria relating to amenity.</p> <p>Policy 4 already allows ancillary uses such as café uses within EDAs.</p> <p>The Edinburgh policy approach highlighted relates to industrial / commercial land in the urban area i.e. outwith any designated economic development area. The current Dundee LDP approach is actually less restrictive than the Edinburgh policy.</p>	<p>Consideration will be given to whether policies 3 and 4 need to be amended to allow for further uses within EDAs. The impact of this on the EDAs and the employment land supply will also be considered.</p>
<p>There were no specific comments in relation to the maintenance or otherwise of the Specialist EDAs.</p>	<p>This is noted.</p>	<p>Have further dialogue with Scottish Enterprise and others to understand whether the Specialist designation should continue.</p>

5. Suitability of Specific Sites

SEPA has commented on all sites. There are various comments made in respect of the employment land designations.	These must be taken into consideration in preparing the LDP. Inclusion of the EDAs as part of the Development Sites Assessment process may assist with this.
ABB Nitran: I&H Brown seeking mixed use scheme including retail.	Cleared and decontaminated site. Good access and visibility from Kingsway. This size and location of site could make a contribution to the broader energy sector.
Dock Street Gas Holder: National Grid Continued request for retail allocation on this site.	It is in close proximity to the Port and offers a large level site with good access to the road network and Port. East Dock Street is a constraint in terms of access to the Port, but not a barrier as the resposdee suggests.
Medea Dunsinane: Adaya Ltd seeking residential development.	Part of this building still appears to be in use. Comments made regarding lack of demand for industrial units, and that the building has an unusually low ceiling. It sits within Dunsinane and raises issues regarding the compatibility of housing next to industrial uses. Given the expected Peter Vardy redevelopment on the adjacent Valentines site, the demand for industrial / commercial space in this location may increase.
Stewarts Cream of Barley: Bruce Linton seeking residential development.	Site contains industrial buildings and offices that are still in use. Housing to the south and west. Good access and visibility from the Kingsway. Buildings are still occupied and whether this is a good environment for housing development as it may not be compatible with the adjacent commercial uses.
Myrekirk Road: CWP seeking retail development.	Part of the site that could be left over following Aldi development. This sits within the industrial estate which has few vacant sites or buildings. Access can still be gained to the site following Aldi construction. Not considered that there is a need to remove from the GEDA.

Main Issue / LDP1 Policy / Other Issue (reference & heading)	Main Issue 2 – Blackness GEDA	
Officer:	AH	
Body or person(s) submitting a response (including unique reference number):		
04 – West One	18 – SNH	50 – Stobswell Forum
05 – Archid Architects	28 – Ian Hiddleston	56 – Historic Environment Scotland
11 – Dundee Civic Trust	29 – Barratt Homes	57 – Friends of the Earth Tayside
13 – Scottish Government	30 – Scottish Enterprise (commenting as Key Agency)	58 – Rapleys
14 – Ardmuir Developments Ltd	42 – SEPA	59 – Pulse Electrical
15 – ARGrieve	48 – Dundee Resources Centre	

1. Summary of the Comments to the MIR	
Support Preferred Option	17 Responses in support of the Preferred Option
04 – West One	<p>Blackness was predominantly Industrial for years but new business are springing up in the area in relation to Music (Music and Dance Studios), Fitness (Cross Fit and the white Room Yoga), The Arts (The Wasps building), Culture (Verdant Works) etc..... More of these would be good. It's close to both Universities. Unlike lots of other areas in Blackness that have just been flattened to make way for rows of similar townhouses I feel more of a community should be introduced in this area with all of the above.</p> <p>I do feel it would make a great ex industrial area housing galleries, printing, craft shops, music. It also requires a community also so urban style flats/warehouse style flat and offices (creative design (not copy)like District 10).</p> <p>Given proximity to both Universities it could tap into the resources of both. Some buildings are of poor design and the area looks a bit mish mash. However there are some nice buildings in the area. The area I feel has great potential however the council should decide what buildings are staying, what are going. What will go in the demolished buildings place? What heights buildings can go?</p>

	<p>There should be a community in this area, this will help spring up small cafes, bar's, eateries, etc.....Perhaps a Design/Art Quarter (Creative Quarter). They say the best songs and ideas come from not the prettiest environments, take Manchester in the late 80's for example (it could be a mini Northern Quarter).</p> <p>The area would be an extension to the already bohemian and independent start-up companies in the West port.</p>
05 – Archid Architects	<p>The area has great potential as a creative 'quarter'. Emphasise the point that to think the area could be filled with light industrial uses only, which would probably require large companies developing large sites is probably unrealistic and would only encourage further stagnation.</p> <p>Any such quarter would need to accept a range of uses including retail, leisure and housing with live / work units being something that may be considered. At the same time as allowing 'housing' I would suggest that your typical 'developer' housing development should not be allowed but conversions of industrial buildings and schemes designed to fit the industrial character of the area may be acceptable.</p> <p>The use classification of the area is restrictive would be very difficult to demonstrate/prove that the scheme would not effect future planning applications for light industrial use on neighbouring sites and would not be effected by noise etc. from other sites.</p> <p>The other policy that would prove restrictive is the minimum 2 bedroom / 60sqm rule applied in Appendix 3. Many graduates and young people may not want or need two bedrooms and may be tired of sharing having been through university, while I understand the rule is designed to ensure space standards, it does leave Dundee very short of affordable residential accommodation for single occupiers and couples who only need one bedroom. I understand that this is a separate issue but perhaps it could be relaxed as part of one development area as an experiment to see what happens?</p>
11 – Dundee Civic Trust	<p>It seems logical to prepare a master plan but in doing so it is most important to acknowledge the Conservation Area status and the Listed Buildings, including the number of buildings at risk.</p>
13 – Scottish Government	<p>The approach accords with paragraph 103 of Scottish Planning Policy (SPP) which states that where business sites are underused reallocation to enable a wider range of viable business or alternative uses should be considered. In applying this approach paragraph 103 also states that careful account of potential impacts on existing businesses on the site should be taken. We would urge this approach at Blackness. In taking this issue forward it would be useful to provide clarity on the sort of additional uses considered appropriate for the site. We note the reference to complimentary uses and seek clarity in relation to these.</p> <p>Paragraph 96 of SPP states that development plans should support opportunities for integrating efficient energy and waste innovations within business environments. There does not appear to be existing development plan policy on this and it is not covered in the MIR. Consideration of such provision should be given in taking the plan forward.</p>

14 – Ardmuir Developments Ltd	<p>The policy specifically states that ‘other uses will not be supported.’ However, in terms of Blackness EDA, given the floorspace that has already been granted planning permission for these ‘other uses’, it would seem this restriction appears to be much less relevant in this location. There are various service users within the area which comply with the Development Plan allocation, but others are noncompliant and include retailing, cafes, a gym and mosque. This wider mix of current uses integrates well and operates effectively.</p> <p>The historic value of Blackness EDA is noted, however in recent years its primary function has been eroded with the integration of these new uses. Our client supports the Council’s preferred option for Main Issue 2: Blackness General Economic Development Area, in their view to adopt a more flexible policy designation. It is clear that there has been a move away from Class 4, 5, and 6 uses, which reflects a general willingness to see the area relaxed in terms of its use class restriction. The policy revision would have the potential to attract investment to Blackness EDA by improving the appearance and attractiveness of the area as a place to invest, and through encouraging the redevelopment and reuse of vacant land and buildings to bring them back into productive use.</p> <p>As well as improving employment opportunities and productivity there remains a clear opportunity to improve the quality of the built environment through the provision of high quality space and design, increased connectivity and more welcoming future investment. Our client proposes that student accommodation be included as a suitable use within the Blackness EDA. It is clear that such accommodation is complementary to other uses within the area, where purpose built student accommodation is already established within Blackness. This is further reflected in the Council’s recent public consultation on the Blackness EDA, where the indication of a further study area extends the boundary to include additional new build student accommodation at Keiller Court, West 1 and The Hub along Hawkhill.</p> <p>In addition to this, the wider boundary would take in the Travelodge Hotel, Grosvenor Casino and Westport Serviced Apartments, alongside several restaurants and a small scale retail unit. Taking this into account and importantly acknowledging the established use within the area, it is considered that student accommodation is an acceptable use, and should be brought forward as such within the Proposed Plan.</p>
15 – ARGrieve	No comments.
18 – SNH	<p>We note that Figure 4 of the MIR excludes Lochee Road and West Marketgait from the Economic Development Area boundary. These roads represent a major impediment to connecting the Blackness area to the rest of the city to the north, including locally important greenspace at Dudhope Park. To meet the aims of the Spatial Strategy, and the Preferred Option aim of improving the attractiveness of Blackness, addressing the barrier created by the road to the north should be a key element of the policy approach and the required design process.</p> <p>Tools of townscape assessment and capacity work can aid in understanding constraints and opportunities of the site and in its urban context. This work could consider enhancing physical and visual links to wider townscape as well as the scale and massing of development. The setting and form of any culturally important industrial heritage can also be taken on board in this work. While the existing built environment of this area is</p>

	<p>dense, we recommend that the masterplan consider opportunities for 'greening' through retrofitting as discussed in paragraph 4.14 of NPF3 and principles for creating attractive places in the Town Centre Toolkit.</p> <p>Actions which would support the aim of improving vibrancy and attractiveness of the area include introducing green streets (page 32 of the Town Centre Toolkit), putting people and pedestrians first in an integrated network (page 67), creating a safe and encouraging cycle environment (page 78) and agreeing a collective vision on what is unique about Blackness (page 121).</p>
28 – Ian Hiddleston	<p>The existing policy is not sustainable as it has resulted in general decline. There is much dereliction which makes the area unwelcoming generally. The upper floors are unmarketable and the fabric of the buildings, many of them Listed as of historic importance, are dilapidated due to lack of investment opportunities. My clients will be supportive of the Council if it adopts a more flexible policy direction such as the proposals illustrated at the 'drop-in event' held recently at Verdant Works. The area desperately requires revitalisation and the concept put forward for placemaking, connectivity, facilities, amenity and safety are all required, however, they may not be achievable without the vibrancy that housing accommodation for a young skilled and professional workforce which resided in the area would bring. This is the reason that 'Arts quarters' work elsewhere and this would also provide the necessary investment.</p>
29 – Barratt North Scotland	<p>Barratt North Scotland would support the inclusion of residential as a possible use in this area.</p>
30 – Scottish Enterprise	<p>The Blackness area is well suited to a mix of land uses, including employment, leisure, restaurant / café, boutique hotel and some high density residential uses.</p>
42 – SEPA	<p>While we acknowledge the potential positive benefits that the adoption of a more flexible policy designation and the preparation of a robust physical and economic regeneration could bring to Blackness, we would be mindful that the creation of a more mix of uses for the area than already physically exists or indeed is currently planned for should be resilient to environmental constraints including climate change. Such environmental issues and the suitability of any land uses should be carefully considered at the proposed masterplan exercise.</p>
48 – Dundee Resources Centre	<p>The area is ideal for creating the circular economy; I like the term "industrial symbiosis" and there are a number of current players in this area including DRC which is keen to go deeper into re-use than "cherry picking" the best items. Some of the down-at-heel mills are perfect for coping with a large number of item which would otherwise be dumped (including DCC Special Collections). These premises are also suitable for pop-ups and should enjoy a relaxation of rates rules where premises! are being shared.</p>
50 – Stobswell Forum	<p>No comments.</p>
56 – Historic Environment Scotland	<p>We welcome the aspirations outlined here for the continued regeneration of the Blackness General Economic Development Area. The commitment to the reuse of long term vacant and derelict buildings is particularly welcomed. The preferred approach of preparing a masterplan for the area is sound and should be informed the Conservation Area Character Appraisal. Historic Environment Scotland would be happy to be involved in the</p>

	preparation of any masterplan for the area.
57 – Friends of the Earth Tayside	We support the proposal for a more diversified approach to this area close to the City Centre. Non-industrial uses, together with enhanced sustainable travel provision, could help to reduce air pollution impacts on existing hotspots.
58 – Rapleys	<p>To maintain the current policy designation (Policy 3 of LDP), restricting uses to Class 4 (business), 5 (general industry) and 6 (storage or distribution) only, would in our view, result in further decline in the general appearance, function and character of the area, to the detriment of attracting new investment and complementary uses into the GEDA. To remove the policy designation entirely and allow any uses to locate here, subject to usual controls over ‘bad neighbour’ developments, would also not be supported by Rapleys, given that there presently exists a fragile core of good business enterprises whose way of life would be harmed should tighter restrictions be introduced to mitigate any compatibility issues. We believe the solution to the last option would be to better understand, set out and agree a future development and improvement framework for the GEDA area where changes considered favourable and compatible with the current position can be introduced in a phased and planned manner in collaboration with the businesses, landowners and residents themselves.</p> <p>VISION FOR BLACKNESS GEDA</p> <p>We agree that the future replacement Local Development Plan should introduce a more flexible policy approach to changing Policy 3 by including proposals to:</p> <ul style="list-style-type: none"> • prepare a physical and economic regeneration masterplan • promote the opportunities to develop Blackness as a location for new employment and other complementary uses • improve the vibrancy and attractiveness of the area. <p>We believe the flexibility built into a new Policy 3 may attract the following broad uses, potentially concentrating these in or around ‘hubs’ of established complementary uses:</p> <ul style="list-style-type: none"> • Creative arts spaces / store (class 11,6) • Higher education accommodation (class 9) • Food and drink production/store/sales (class 4,6,1 restricted) • Industrial heritage visitor attractions (class 11) • Bulky-goods sales (class 1 restricted) • General industrial (class 5, 6) <p>In relation to Scottish Government advice, Scottish Planning Policy (SPP) 2014, states that Local Development Plans should allocate a range of sites for business, taking account of current market demand; location, size, quality and infrastructure requirements; whether sites are serviced or serviceable within five years; the potential for a mix of uses; their accessibility to transport networks by walking, cycling and public transport and their integration with and access to existing transport networks. The allocation of such sites should be informed</p>

	<p>by relevant economic strategies and business land audits in respect of land use classes 4, 5 and 6.</p> <p>We consider the GEDA should not be identified as one overall land use class 4,5,6 or be designated as such, rather the whole GEDA should be broadly guided by principles stated above – and be the primary theme running through any site brief or development masterplan for the area.</p> <p>It follows, that SPP Paragraph 122 states “Local development plans should allocate appropriate sites to support the creation of sustainable mixed communities and successful places and help to ensure the continued delivery of new housing”. We believe the vision for Blackness can be achieved with these principles at the forefront, with an emphasis on “mixed communities”.</p> <p>We have shown on the attached conceptual framework plan, representing one of our visions for Blackness GEDA, how the uses we are proposing to be accommodated at Blackness, fall into ‘hubs’ created around existing spots, with the potential for these hubs to grow at these spots without threatening the compatibility of the various uses. The hub areas of influence defined by greening of the urban realm and reduction of vehicular movement in places.</p> <p>Further evidence and commentary about our professional views on a future for Blackness is also found in the attached representation document prepared by Rapleys.</p>
<p>59 – Pulse Electrical</p>	<p>The area would certainly benefit from some sort of guidance or structure considering the lands proximity to the town centre. With the waterfront development and other improvements over the years in the City Centre, the Blackness area, to the outsider appears to have been forgotten about. the problem is with the restrictive planning, at the moment any new forward thinking ideas cannot be fairly considered due to the current planning restrictions. Looking at city’s such as Glasgow where Merchants Square, a previous Fruit Market, is now a great social venue which is bustling with busy restaurants and entertainment venues</p> <p>Without some kind of relaxation in the planning restrictions for this area developers and businesses are not going to be willing to invest in what is essentially a derelict, vacant, run down and forgotten area of the Dundee City Centre.</p> <p>Current Problems</p> <ul style="list-style-type: none"> • Vandalism / Graffiti - As a land owner I feel that any improvements made, a coat of paint or a new sign quickly becomes vandalised - If the area was busier in the evenings with members of the public using the area, the vandalism and constant graffiti would not be such a concern • Parking - City Centre workers park their cars in this area leaving a parking issue for companies in the Blackness area - Residents Parking permits for street parking should be issued to business Free Of Charge, restricting City Centre workers from parking their cars. • Unsafe at nights - My wife would not feel comfortable in this area on her own in the evening - The Blackness area would be more secure in the evenings if restaurants, theatres, concert venues, shops, residential dwellings with parking etc were in place • Condition of existing buildings - Many of the buildings look derelict (I may be wrong), although some of

	<p>these buildings have great character and restored sympathetically could be fit for many varied uses.</p> <p>The Meadow Mill area has recently undergone a significant modernisation, although the rest of the area remains stagnant and unappealing, buildings do have character in the area although to secure investment for restoration the usage of these buildings must be considered at planning level. If planning restrictions are relaxed the area will benefit from investment from companies and developers, investment which it urgently requires. The Coffin Mill (Pleasance Court) and the adjacent housing with the small Coop supermarket is a good example of breathing life into the area. Cobbled streets, with sympathetic lighting could make for a fantastic area, close to the Dundee City Centre.</p> <p>Parking is an issue at the moment although the area is large enough for car parking spaces for any future developments to be easily considered. Restaurants etc. should provide adequate parking for customers and any housing should be with parking spaces. Preferably town house style or flats with a similar set up to the City quay development (flats with parking on the first floor of the building and accommodation on higher levels) or town housing with a garage per property like the townhouses in Glenagnes Road The area would benefit from an open space, a small park maybe with trees and possibly some modern art / sculptures to really make a centre to the development. Cafes / restaurants with external eating areas.</p> <p>Currently I have no idea if many of the buildings are derelict or used as storage, to an outsider this area of the City Centre would appear to be mainly derelict and forgotten about. This is a real shame, with all the works which are being carried out at the Waterfront at the moment this area is being left behind and urgently requires attention from the town planners to allow a range of facilities that this area requires.</p>
Drop In Consultation Event	<ul style="list-style-type: none"> • Area definitely needs developed. • Units are very empty. • Lots of opportunities with the university being nearby i.e. sports facilities. • Current lack of parking. • I really think that this space could be better used. Being so close to the university campus I know that if there were more social spaces, cafes, bars, and restaurants etc. would attract students. • I think that green infrastructure would also liven up the area. A kind of Central Park, New York style space, in amongst all the concrete jungle! • Improvement in café provision for visitors. • Free parking for local businesses and visitors. • Better use of Verdant Works by artists – workshops, provision for exhibiting and talks etc. and free parking for WASPS artists. • Better signage and regeneration of old buildings, building on the arts and WASPS – re: Design Museum coming etc. • Recommendation for more flexible planning uses, re: <ul style="list-style-type: none"> ○ Eco-Centre (upcycling) ○ Specialist retail ○ Training facilities for traditional skills e.g. upholstery

	<ul style="list-style-type: none"> ○ Community space to pass on more carbon friendly resilience and skills ○ Individual Learning Accounts Centre <ul style="list-style-type: none"> ● Complete refurbishment of the Blackness GEDA. ● More parking spaces please. ● Limited Time Parking Spaces – consider extending time limits from 45 minutes to 1 and a half to 2 hours. ● I have no objections to any of the suggested “Options” detailed on your “Options” wall display.
	<ul style="list-style-type: none"> ● Most participants agreed that the issues with derelict/vacant land and buildings needed to be tackled and the proposal to introduce wider uses in the area was encouraged. All of the alternative uses proposed on the presentation boards received a positive response. ● An outdoor café would be welcome in the area, preferably with green infrastructure. ● The introduction of a café/Arts Café received positive feedback from many participants. ● Increased social space was welcomed and night time functions (evening economy) were encouraged, such as music venues, which could be integrated with café functions. A bowling alley was also suggested. ● Niche retail space was suggested. ● The Brittle Bone Society stated that they would like to have a café and a good quality charity shop within their premises on Guthrie Street. (<i>note: their premises is outside of the GEDA</i>) ● Conference space was recommended (250+ capacity) with sleeping accommodation and accessible rooms. ● A question was raised over the opportunities available to apply for grants/funding to improve small established businesses. ● Concerns were raised over the general appearance of the area, particularly the poor quality landscaping and graffiti in the area. The area is too dark in the evening and safety concerns were raised. ● Many participants welcomed open spaces with trees, planting and grass, which would improve health, wellbeing, access and provide opportunities for pedestrianisation. Disabled access to the area should be improved. ● Many participants expressed the urgent need to develop Queen Victoria Works as it is an eyesore and it has a significant negative impact on the area. ● Many participants raised issues with parking issues in the area: <ul style="list-style-type: none"> ○ There is not enough parking for customers visiting businesses. ○ Buildings such as the Meadow Mill (WASPs) do not have enough parking for the tenants and visitors. ○ Certain streets have loading bay restrictions in place which are not used and limit the parking potential in the area. ○ One participant recommended increasing the 45 minute on-street parking to 90 minutes. ● Two participants stated that there are issues with gaining access to land/properties that is advertised for sale. Through the process of searching for land/properties they were regularly unable to progress their interest due to unresponsive contacts. Some of these properties are apparently still on the market for sale. (This appears to be a city wide issue)

	<ul style="list-style-type: none"> • More affordable land and property should be made available for start-up businesses, including construction workers; design and creative sector; and general business use. The current lack of available property is forcing more people to set up businesses at home. • Several participants highlighted the importance of regenerating the DC Thomson building (West Ward Works), due to its large scale/footprint and the wide impact it has on three streets (West Henderson's Wynd, Guthrie Street and Blinshall Street). The building has great potential as a festival venue and potential concert spaces. • Traffic movement through the area is problematic as cars use it as a shortcut from Lochee Road to the City Centre. Access into the Blackness GEDA should be improved. • For safety reasons and to expand the potential of the Verdant works it was recommended that a portion of West Henderson's Wynd should be pedestrianised with service vehicle access only. • One participant suggested that the area could benefit from an anchor store, like the former Comet which attracted many people to the area. • One participant stated that the area needed to consider introducing use classes 1, 3, 10 and 11 to the area in order to stimulate growth. Street events were also encouraged. • Merchant City (Glasgow), Box Park (London) and Gronigen (Netherlands) were cited as a good precedent studies for the area. • Concerns were raised that with improvements to the area, rent and rates will increase.
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2. Collated Comments	3. DCC Initial Response	4. Further Consideration
<p>Comments all supported the preferred option.</p>		
<p>West One, Archid, Ian Hiddleston, Scottish Enterprise, Friends of the Earth Tayside, Rapleys and Pulse Electrical all supported a wider mix of uses within the GEDA and put forward suggestions for the mix of uses that they believe should be supported in Blackness.</p> <p>Attendees of the drop in event also suggested potential uses. These suggestions included conversion to housing and new build townhouses; student accommodation; leisure uses; open space; recycling uses; the concept of mixed communities; creative arts spaces; food and drink production; visitor attractions; bulky goods sales; other retail; small supermarket, conference facilities and general industrial uses.</p> <p>Several attendees of the drop in event also highlighted the need for some kind of social</p>	<p>Whilst it is recognised that some or all of these uses would help to bring about positive change within Blackness, the scale and impacts of these uses requires further consideration to ensure that the change is positive and that it is not to the detriment of any existing or future general economic uses.</p>	<p>This broad range of uses will be taken forward and used to help develop the proposed new policy approach for Blackness. It may be that these uses are not specified in the policy itself, but that they are given further consideration at the proposed masterplanning stage.</p>

<p>space or café within Blackness. Pulse Electrical highlighted Glasgow's Merchant Square as a good example of creating new and more vibrant uses from former industrial premises.</p>		
<p>Several responses discussed the current policy approach and Ardmuir Developments Ltd, Ian Hiddleston and Rapleys all noted that this restrictive approach is resulting in the general decline of the area. This decline will only continue as the area continues to fail to attract investment. Ardmuir Developments Ltd noted that the primary function has eroded.</p>	<p>It is recognised that there has been a general decline in the area and despite previous public sector efforts to regenerate parts of the GEDA there is a continuing lack of private sector investment. As detailed in the Main Issues Report the current planning policy approach does restrict the range of new uses within Blackness.</p> <p>These comments are helpful in supporting the Main Issue options which all seek to use planning policy to encourage change and attract investment to Blackness.</p>	<p>These comments are noted and these uses will be given further consideration as the proposed new policy approach for Blackness is developed.</p>
<p>West One and Archid have suggested that the area could become a creative or arts quarter containing a mix of uses including retail, leisure, housing and food and drink uses.</p>	<p>Rebranding the area or part of the area as a 'quarter' is something that would most likely evolve from the proposed masterplanning process rather than being something that the Local Development Plan would establish. However should the planning policy approach include some form of zoning or renaming of the GEDA, it may consider using 'quarter' as a title in order to highlight the diversity of uses.</p>	<p>These comments are noted and these uses will be given further consideration as the proposed new policy approach for Blackness is developed.</p>
<p>Archid and Scottish Government have both highlighted that in preparing a new policy approach consideration must be had for the potential conflict with existing occupiers and future industrial/commercial occupiers. Allowing 'new' uses such as residential may in effect sterilise adjacent sites from being developed with industrial or commercial uses. A drop in event attendee mentioned potential rates increases arising from any uplift in the quality of the area.</p>	<p>The Main Issues Report notes that new uses could occupy the area on the basis that they will complement the existing uses. It is implied that the intention is not to drive existing businesses or future economic development away from Blackness but that appropriate uses in appropriate locations can positively contribute to the area.</p>	<p>This is a valid concern that will be taken forward for further consideration as the proposed new policy approach is developed.</p>

<p>Several respondees have suggested matters that any future masterplanning exercise should consider. SNH, Scottish Government, Historic Environment Scotland, West One, Rapleys and Pulse Electrical have suggested matters including how roads are a barrier to green connectivity; identify opportunities to green the area; set building design parameters; put people first; improve the public realm; create 'hubs' as a focus for development.</p>	<p>These comments are helpful in highlighting some of the specific matters that will need to be considered as part of a masterplanning exercise. The identified matters are all relevant.</p>	<p>These comments are noted and these uses will be given further consideration during any future masterplanning exercise.</p>
<p>A large number of attendees of the drop in event raised the issue of parking as something that needs to be addressed. The lack of on- or off- street parking and the charging for on-street parking were raised. Some attendees felt that future plans should include free controlled parking for workers.</p>	<p>This issue was discussed with attendees directly. It is recognised that there are issues with the availability of on-street parking within Blackness. However the expectation appears to be that workers and customers should be able to park immediately outside business premises.</p> <p>With three major bus routes running around the north, south and east of Blackness the area is very well served by the bus network. The Bell Street Multi Storey car park is located within a 10 minute walk of the centre of Blackness and there are two short stay car parks located on Hawkhill.</p>	<p>These comments are noted and this issue will be given further consideration during any future masterplanning exercise.</p>
<p>Rapleys submitted material outlining their initial thoughts as to how the Blackness GEDA could be masterplanned.</p>	<p>This is helpful in illustrating the potential to masterplan the area.</p>	<p>The material will be taken forward to assist with the development of the proposed new policy approach.</p>

Main Issue / LDP1 Policy / Other Issue (reference & heading)	Main Issue 3 – Supply of Land for Housing	
Officer:	RP	
Body or person(s) submitting a response (including unique reference number):		
02 - Inverarity Farms Ltd	30 – Scottish Enterprise (as Key Agency)	47 – H&H Properties (Riverside Drive)
09 - Broughty Ferry Community Council	32 – Manse LLP	50 – Stobswell Forum
11 – Dundee Civic Trust	33 – Philip Duncan	51 – Stewart Milne Homes (Ballumbie 1)
13 – Scottish Government	34 – West Green Park Residents	52 – Stewart Milne Homes (Ballumbie 2)
15 – Professor A R Grieve	37 – Catherine Duncan	53 – RSPB
17 – Taylor Wimpey / AWG	38 – Springfield Properties	55 – Scottish Enterprise (as landowner)
18 – Scottish Natural Heritage	40 – Gladman Scotland	56 – Historic Environment Scotland
20 – Balmoossie Developments	41 – Miller Homes Ltd	57 – Friends Of The Earth Tayside
25 – Homes for Scotland	42 – SEPA	61 – TACTRAN
26 – Persimmon Homes North Scotland	43 – Ristol Consulting Ltd	62 – Kirkwood Homes and Linlathen Developments
27 – Strategic Land Scotland Ltd	44 – Mr J Thompson (Ristol)	66 – Elderly – Workshop Response
28 – Hiddleston and Feist	45 – H&H Properties (North Grange)	69 – Youth Council – Workshop Response
29 – Barratt North Scotland	46 – Stewart Milne Homes (Emac Planning)	

1. Summary of the Comments to the MIR

Support Preferred Option	
18 – Scottish Natural Heritage	<p>The constraints of available land within Dundee’s tightly defined boundary mean that the ‘where’ and ‘how’ of housing are critical issues, particularly if the plan is to deliver high-quality, lifetime communities. In the absence of site assessment information it is difficult for us to agree with the Options presented in the MIR. However, on the basis of information provided, we consider that the Preferred Option is most likely to meet the Spatial Strategy aims.</p> <p>The Preferred Option includes land at Linlathen which lies within the Dighty and Fithie Corridor (East) Green Network. Land at Baldragon is also within the Dighty and Fithie Water Corridor Green Network. The area for release is near the Miley/South Road Link identified in the Green Network Planning Guidance as a key element linking the Dighty and Fithie Water, the Citywide and the Western Gateway Green Networks. We welcome the inclusion of the green network in the need to ensure that new development is supported by the necessary infrastructure. Page 28 of the MIR states that assessment of allocations will include infrastructure (including active travel and links to the green network), allowing the Council and developers to address deficiencies in the Proposed Plan and Action Programme. In addition, this assessment should help achieve the stated aims of a green, healthy and connected City. This will require commitment to green infrastructure as part of the design process as set out in the Green Network Planning Guidance.</p> <p>As identified on the DCC Call of Site and Housing Land Sites figure, there are several very large Call for Sites areas defined on the western and northern fringes of Dundee (including MIRs 74, 79, 88, 89, 76, 77, 86 and 99). The scale and location of these sites we consider have the potential to significantly and adversely impact upon the well-defined landscape setting of Dundee. In some instances the scale of proposed allocations is such that they would additionally incur cross boundary impacts. We strongly recommend that any further consideration of these potential allocations should be informed by landscape assessment and capacity work. Comprehensive assessment can inform how these areas contribute to the unique setting of Dundee and where further development would be appropriate, responding to landscape and visual sensitivities and enhancing the already distinctive approaches to the City rather than detracting from them. Furthermore this can allow for consideration of what the role of these additional development sites should be, in relation to adjacent rural settlements, for example MIR89 adjacent to Birkhill and MIR 77 to Liff.</p>
20 – Balmossie Developments	<p>We support the preferred option in so far as it relates to the release of additional greenfield land to the east of the city.</p> <p>The 2015 Dundee Housing Land Audit already includes the sites at Baldragon and Linlathen in the Established Supply therefore, the additional housing land requirement of 269 units, as set out in Table 1 (page 25) of the MIR will have to come from additional allocations. The Council cannot rely on the ‘managed’ release of greenfield land and must commit to allocations within the replacement Local Development Plan.</p> <p>Sites such as that at Balmossie can make an effective contribution to the housing land requirement for Dundee.</p>

	<p>The site was not allocated for development in the current LDP as it was not considered necessary to meet the strategic housing land requirement which focussed instead on greenfield sites in the Western Gateway and regeneration of brownfield sites. In considering the site as part of the Examination Report on the Proposed LDP, the Reporter confirmed that this site would relate well to existing development at Balmossie.</p> <p>The site is in the control of an experienced property developer and housebuilder who have extensive experience of delivering new housing development in this area. This site is therefore an effective, viable and deliverable housing site and meets the requirements of paragraph 55 of Planning Advice Note 2/2010 and the effectiveness requirements set out in the SPP.</p>
25 – Homes for Scotland	<p>Whilst Homes for Scotland has chosen the preferred option we would point out that SPP (paragraph 110) requires the planning system to maintain at least a 5-year supply of effective housing land at all times and policy 5 of Tayplan advocates a 7-year supply. Homes for Scotland consider that whichever spatial strategy is selected, the most important thing is that it is capable of being delivered. This means identifying a range of sites in marketable locations (in line with the plan objectives) that are genuinely effective or capable of becoming effective and delivering homes within the LDP and SDP timescales.</p> <p>The presumption in favour of developing brownfield land should not be to the expense of promoting a good range of sites which include greenfield land across the city.</p> <p>The new PAN out for consultation on Housing and Infrastructure focuses on the need for Planning Authorities to produce SDP/LDPs that deliver. Central to this is careful consideration by them of the viability/deliverability of any sites being considered / promoted for allocation.</p> <p>In order to be consistent, the Local Development Plan must ensure that there is sufficient effective land available to meet the requirements of Policy 4 of the TAYplan Proposed Strategic Development Plan 2016-2036 (May 2015) namely an average of 480 up to year 10 of the plan. Previous to this it was 610 houses under Proposal 2 Strategic Development Plan 2012 – 2032. Policy 4E actually gives the LDP the flexibility to plan for house building rates in excess of this figure.</p> <p>The timescale of the main issues report is contrary to the TAYplan Proposed Strategic Development Plan. The emerging LDP must comply with the timescale and adopt the period 2016 to 2028 rather than 2018 to 2028.</p> <p>The Report highlights that take up rate 2015 to 2018 is 912 (at 304 completions per annum). Homes for Scotland would argue that presently the completion rates are around 210 per annum but this is not an accurate reflection of what the house building industry could complete if there were more <i>effective</i> allocated sites throughout the City. As a consequence of this, Homes for Scotland would urge the Council to be bold and in allocating more sites that are proven to be effective. There is clearly more scope for collaborative discussion on housing land supply and Homes for Scotland would urge the Council to work with our members an early stage so as to ease the passage of the proposed plan in its later stages.</p> <p>We have calculated that 32% (507 units) out of a total of 1598 of all sites as set out in the HLA 2015 are not</p>

considered to be effective.

If Dundee City Council really wishes to halt population decline, increase investment within the city and offer a range of houses of mixed tenure, then it should take a pro-active role in allocating a generous supply of effective housing land, rather than relying on brownfield sites many of which are not effective. Homes for Scotland are willing to engage in this process, and hope to be able to work with the council to determine accurate housing land supply figures prior to the Proposed Plan stage of the LDP. Allocating sites that will not be built in the short term serves no purpose, and contradicts Scottish Government's overarching objective of increasing sustainable economic growth.

The Council has adopted a Windfall Site assumption of 1,152 homes based on 20% of the housing land requirement of 5,760 homes.

As required by SPP ...any assessment of the expected contribution to the housing land requirement from windfall sites must be realistic and based on clear evidence of past completions and sound assumptions about likely future trends... and ...in urban areas this should be informed by an urban capacity study (paragraph 117).

Homes for Scotland would argue that the Council has not provided any evidence to support this assumption of 20% of the housing land requirement. Until such evidence is presented, no allowance for Windfall Sites can be adopted by the Council.

By adopting this unproven Windfall assumption, the Council appears to be delivering the generosity allowance of 20% through Windfall Sites. This will not add the required flexibility to maintain a 5 year effective housing land supply at all times and therefore runs contrary to the provisions of SPP.

The Council has taken account of the TAYplan Proposed SDP. TAYplan Proposed SDP requires a housing supply target of 480 homes per annum and a housing land requirement of 528 homes per annum (including 10% generosity allowance) over the 12 period 2016 to 2028 (equivalent to 2016/17 to 2027/28). The Council has adopted a housing supply target of 480 homes per annum in accord with the Proposed SDP. In accord with Proposed SDP Policy 4 Homes, the Council has adopted a generosity allowance of 20% for the MIR rather than 10% as set out in the Proposed SDP. The housing land requirement is therefore 576 homes per annum (480 homes plus 96 homes or generosity allowance of 20%).

Furthermore the Council has identified that this housing land requirement is over the period from 2018 to 2028 (equivalent to 2018/19 to 2027/28) and equates to 5,760 homes. To comply with SPP requirements, this housing supply target must be identified over the 12 year period from 2016 to 2028 (equivalent to 2016/17 to 2027/28) to accord with the Proposed SDP. Accordingly, Row A of Table 1 Supply of Land for Housing should be amended as follows: A Housing Land Requirement 2016/17-2027/28 (12 years @ 576 units p.a.) equating to 6,912 homes.

The Council has identified that the Established Supply according to the 2015 Housing Land Audit is 5,051 homes. This includes Constrained Sites. The Council considers that 4,129 homes are effective from the established housing land supply from 2018/19 to 2027/28. This is incorrect and is not comparable with the

	<p>required time period of the Proposed SDP from 2016/17 to 2027/28. The 2015 Housing Land Audit establishes that 328 homes are expected to be completed in 2015/16. This does not form part of the assessment period in accord with the Proposed SDP and should be excluded. Accordingly Homes for Scotland would argue that the Proposed Plan should identify its housing land shortfall and allocate land as follow:</p> <table border="1" data-bbox="667 268 1570 783"> <tr> <td>A</td> <td>Housing Land Requirement 2016/17-2027/28 (12 years @ 576* units p.a.)</td> <td>6,912</td> </tr> <tr> <td>B</td> <td>Established Supply at March 2015 (Housing Land Audit)</td> <td>5,051</td> </tr> <tr> <td>C</td> <td>Expected completions in 2015/16 and Constrained Sites</td> <td>354</td> </tr> <tr> <td>D</td> <td>Potential Established Supply at 2016 (B – C = D)</td> <td>4,697</td> </tr> <tr> <td>E</td> <td>Windfall Sites (subject to evidence)</td> <td>0</td> </tr> <tr> <td>F</td> <td>Small Sites contribution (20 units per annum average)</td> <td>240</td> </tr> <tr> <td>G</td> <td>Additional Housing Land Required for 2016-2028 A – (D + E + F) = G</td> <td>1,075</td> </tr> </table> <p>Homes for Scotland considers that the Council is required to allocate 1,975 homes based on the housing supply target selected incorporating a generosity allowance of 20%. Furthermore, Homes for Scotland would urge the Council to focus on delivering effective sites which are known to be capable of being completed in the period to 2028.</p>	A	Housing Land Requirement 2016/17-2027/28 (12 years @ 576* units p.a.)	6,912	B	Established Supply at March 2015 (Housing Land Audit)	5,051	C	Expected completions in 2015/16 and Constrained Sites	354	D	Potential Established Supply at 2016 (B – C = D)	4,697	E	Windfall Sites (subject to evidence)	0	F	Small Sites contribution (20 units per annum average)	240	G	Additional Housing Land Required for 2016-2028 A – (D + E + F) = G	1,075
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28 – Hiddleston and Feist	No comment																					
29 – Barratt North Scotland	<p>Barratt North Scotland agrees with Homes for Scotland response on this issue.</p> <p>In addition, although the principle of the preferred option is acceptable, there are inherent issues with delays of current allocated land. The Housing Land Audit (HLA) includes many Dundee City Council sites which have historically been pushed back through the years due to not being developed, presumably due to lack of effectiveness – poor location for example. BUT, these have continued to be included in the figures. With that in mind, there needs to be more deliverable (preferably greenfield land) released earlier in the Plan to make up for the 'shortfall'. Perhaps there is an argument for some sites to be de-allocated if they have consistently remained undeveloped. A question has to be raised about how Dundee City Council will determine which of the new phase 2 sites would be promoted and ultimately approved. Clarity is required.</p>																					
30 – Scottish Enterprise (commenting as Key Agency)	SE supports the preferred option, based on the brownfield-led approach, with existing greenfield allocation to 2020. It also supports the managed release of other greenfield land, to ensure a 5-year supply of housing land and to provide a range of housing required to meet housing needs over the plan period, but which in particular																					

	<p>should continue to be focused in the strategic growth areas to the west of the City.</p> <p>SE has submitted a representation previously to the Call for Sites process, which is acknowledged remains to be considered in detail. Under separate cover, SE has submitted a further response to the MIR process, seeking allocation of land within the Western Development Area for mixed use (employment and residential), as a means of facilitating the delivery of the employment site. If the lower plateau is released for housing development, as detailed in the Call for Sites submission, it will meet the twin aims of provision land for housing and facilitating cross funding to enable the delivery of the remaining employment site.</p>
32 – Manse LLP	<p>The Proposed Strategic Development Plan states that Dundee should have the flexibility to plan for a housing land requirement that exceeds the 528 units per annum. Dundee City Council proposes that the Local Development Plan 2 will have a housing land requirement that is 20% above the housing supply target set in the Proposed SDP. This increase in housing land supply allocation is welcomed.</p> <p>The Main Issues Report recognises that the current completion rate is below the requirement to achieve supply targets.</p> <p>In achieving the housing land supply target, Dundee City Council needs to consider the sites that are allocated for residential development to ensure that they are deliverable during the plan period.</p> <p>It is requested that this site is specifically allocated for mixed use development with a notional residential unit capacity of 183 units.</p> <p>Manse LLP is fully supportive of Dundee City Council’s preferred option of allocating a generous housing land supply above Strategic Development Plan requirements. They also support the brownfield led approach to housing development. However, consideration needs to be given to the allocation of specific sites and assessment of current allocated sites to determine if they are still effective. The completion rate within Dundee is well below supply requirements.</p>
38 – Springfield Properties	<p>The LDP strategy is to continue to prioritise the development of brownfield land and selected greenfield locations, particularly for the first 5 years of the proposed plan. Thereafter the LDP recognises that there will be pressure for further greenfield release to both the east and west of the City.</p> <p>It will be vitally important that the effective land supply is carefully and regularly monitored to ensure that there is no slippage and that the delivery of housing is a high priority to meet Government objectives. Any review of the housing land figures should be carried out with key stakeholders from the housebuilding industry and Homes for Scotland. Springfield Properties supports the representations from Homes for Scotland and would emphasise that the Main Issues Report is an important opportunity to understand and investigate the housing land requirement of the City and have a robust review of the Housing Land Audit to ensure that the effective sites are viable and marketable.</p> <p>The Local Development Plan must ensure that there is an effective land supply to meet the requirements of Policy 4 of the TAYplan Proposed SDP 2016-2036. This requires an average of 480 homes per year to year 10</p>

	<p>of the plan, Policy 4E gives the LDP further flexibility in excess of this figure.</p> <p>As stated previously the Spatial Strategy must have the flexibility to allow greenfield sites to come forward through a range of sites that are genuinely effective, over the plan period. Dundee Western Gateway through its current planning consents is able to accommodate further growth and this has been allowed for in the design of infrastructure and utilities. The Director of City Development has publicly stated that the Western Gateway is as important to Dundee as the £1 billion waterfront redevelopment and the V&A in terms of its strategic importance to the economy of the City.</p> <p>The Western Gateway development is currently accessible by a range of transport modes. Improvements to Dykes of Gray Road and to walking and cycling routes in the area have already been implemented. In addition, proposed improvements to the Swallow Roundabout and to the public transport services in the area will be implemented as part of consented developments that are currently in the process of being constructed.</p> <p>As part of future development proposals there is the potential for a new primary school and other community facilities to be introduced. These facilities would create a mixed-use development and reduce the need for vehicle trips to be undertaken during peak hours. A direct consequence will be that impacts on the operation of the external road network will be minimised.</p> <p>At an appropriate stage in the development planning process, new traffic surveys to determine the operation of the improved Swallow roundabout and the traffic generation of the constructed initial phases of residential development at Western Gateway can be undertaken. This data would be utilised to inform future updated traffic modelling of the surrounding road network to the Western Gateway.</p> <p>A landscape appraisal has been carried out and highlights that the change from open fields to housing has already begun on the consented sites. Further development to the west and east could be accommodated. An extension of the woodland shelter belts would define discrete compartments for development and screen views into and out of the sites. A landscape strategy would help create a high quality setting for any future development, increase biodiversity, and provide a variety of open spaces with good connections to the surrounding path network.</p> <p>The indicative masterplan identifies a proposed location for a primary school.</p>
41 – Miller Homes Ltd	<p>As required by the Development Planning Regulations, LDP 2 will need to comply with the spatial strategy and housing land requirement/targets in the emerging Tayplan 2. The following is an extract from the Call for Sites Submission prepared by JMPS on behalf of MHL to Dundee City Council in April 2015 (previously submitted) which is important to repeat here:-</p> <p>“The approved Committee version of Tayplan’s Proposed Plan provides up to date information on the Housing Targets to be set over the Plan period and the following are extracts from the Committee Report under proposed Policy 4 Homes (paragraphs 6.22, 6.26 and 6.32 refer):-</p> <p>“The Plan identifies housing supply targets (planned build rates) for Angus (310 homes per year), Dundee City</p>

(480 homes per year) and North Fife (295 homes per year) to meet 100% of the need and demand for new homes identified in the TAYplan-wide Joint Housing Need and Demand Assessment (2013). These levels of new house building are slightly lower than those planned for in the approved TAYplan (2012).”

However, the Housing Land Requirement provides further clarity on the issues facing Dundee City, as not only does the Plan set out a housing land requirement for all housing market areas equivalent to the respective housing supply target plus a 10% margin of generosity (additional land to provide for choice and flexibility), for Dundee City:-

“there is an expectation under the 2012-based household projections that it will see higher household growth than previously anticipated. Dundee City therefore has a housing land requirement of 10%, but Dundee City also continues the previous approach of being able to plan for higher build rates than Policy 4. This allows the Dundee City Local Development Plan to judge the appropriate scale of additional generosity beyond the 10% stated in the Proposed TAYplan. This will be particularly important in judging whether the projected household growth is taking place and possibly the conclusions of the subsequent 2014-based household projections, which may have been published by that time.”

“Dundee City will continue to have the flexibility to plan for higher levels of house building than set out in Policy 4. This should ensure that there continues to be an effective land supply in the Greater Dundee Housing Market Area. Should there be a shortfall or any land become non-effective elsewhere in the Greater Dundee Housing Market Area, there should be a situation where there continues to be more than a 5 year effective housing land in Dundee City. This will be reviewed in the next TAYplan.”

The promoters (MH and Linlathen (Tayside) Developments Ltd) recognise that this is TAYplan’s preferred option as directed at the Main Issues Report stage, when the majority of responses to that consultation stage sought that for Dundee City’s LDP2, it should meet all housing need and demand to provide for a generous supply of land and to meet the new and clarified requirements set out in Scottish Planning Policy (2014) along with the practicalities of social, economic and environmental factors and issues of capacity, resources and deliverability.

The promoters therefore agree that this is the approach that LDP2 should follow and in terms of SPP, the promoters would advocate that the Council has no option but to do so.”

Housing Land Requirement

With regard to LDP 2’s MIR, in compiling its own supply figures, the Council has adopted a Windfall Site assumption of 1,152 homes based on 20% of the housing land requirement of 5,760 homes.

In response to this, SPP requires ...any assessment of the expected contribution to the housing land requirement from windfall sites must be realistic and based on clear evidence of past completions and sound assumptions about likely future trends... and ...in urban areas this should be informed by an urban capacity study (paragraph 117).

The Council has failed to provide any evidence to support this assumption of 20% of the housing land requirement. Until such evidence is presented, no allowance for Windfall Sites can be adopted.

By adopting this unproven Windfall assumption, the Council appears to be delivering the generosity allowance of 20% through Windfall Sites. This will not add the required flexibility to maintain a 5 year effective housing land supply at all times and therefore runs contrary to the provisions of SPP.

The representation being presented to Dundee City Council in response to the MIR on Spatial Strategy and Housing has been supported by an evidenced based Assessment of Housing Land Supply undertaken by Geddes Consulting. The key findings of this assessment are summarised below with suggested changes:-

Over the period 2016/17 to 2027/28 the effective housing land supply is expected to deliver 4,697 homes, requiring the Council's figure to be amended.

The housing land requirement in accord with the housing supply targets set out in the Proposed SDP is 6,912 homes from 2016/17 to 2027/28, requiring the Council's figure to be amended.

The Council has defined its housing land requirement contrary to the timescale of the Proposed SDP and adopts housing land supply assumptions contrary to SPP and PAN 2/2010. The timescale should be amended to 2016/17 to 2027/28 to accord with the Proposed SDP.

Using the evidence presented in this Assessment which meets the methodology set by Scottish Ministers in accord with SPP, the additional Housing Land Requirement has been calculated as being 2,015 and therefore the Proposed Plan should identify its housing land shortfall and allocate land accordingly in line with that figure.

Insufficient land has been allocated in the Council's proposed development strategy to meet the Council's housing land requirement of 6,912 homes from 2016 to 2028. The Council's methodology and assumptions seek to restrict the scale of housing land to be allocated. Accordingly, the Council will not meet its housing need and demand as required by SPP. The Council needs to allocate additional effective housing sites in the Proposed Plan. There needs to be a clear focus on delivery of more completions in the period to 2028. This action needs to be undertaken through consultation with the house building sector before preparation of the Proposed Plan in order to ensure that the housing land shortfall can be met in accord with SPP.

The consequence of failing to do so is that the Council will not maintain a 5 year effective housing land supply from the adoption of the new LDP. This will mean that the housing land supply policies in the new LDP will be considered out of date in accord with SPP paragraph 125. In these circumstances a presumption in favour of development that contributes to sustainable development will apply through the development management process as set out in SPP paragraphs 29 and 32 to 35.

MHL advocates the Plan-led system and has a good reputation in promoting its land interests and developments through the Development Plan process. MH sees no benefit in the Council failing to allocate sufficient effective housing land in LDP 2. Development proposals on unallocated land presented through the Development Management process could be justified by satisfying the presumption in favour of development

that contributes to sustainable development, as set out in SPP paragraphs 29 and 32 to 35. However, this would most likely be achieved by way of planning by appeal if the Council continued its resistance to greenfield releases outwith the Development Planning process.

Therefore, a failure to allocate sufficient land could lead to inherent delays in the planning system and ultimately in the delivery of housing development on the ground.

LDP 1 Spatial Strategy Context

The Local Development Plan 2014 Strategy on Housing states:-

“The quality of housing in Dundee will be improved. This will be done in a sustainable manner. Brownfield development will be a priority. Choice will be encouraged through design that ensures that new development is appropriate to the character of the area in which it is built.”

In terms of the Policy Impact of this Strategy, as set out in the MIR, the Council considers that the “Housing Land Audits since 2011 have consistently demonstrated that there is an effective supply of land for housing. The 2015 Audit identified an effective five year supply of land for 3,162 units.”

However, this contradicts the position taken by Homes for Scotland, the house building industry’s umbrella organisation comprising all the main national house builders, including Miller Homes. As stated in MH’s representation to the Call for Sites consultation in April 2015:-

“The Promoters (MH and Linlathen (Tayside) Developments Ltd) are aware therefore that Homes for Scotland raised concerns that a large number of sites should be deemed as non-effective and concerns over the number of sites within Council ownership, emphasising that there should be a land disposal strategy for these sites.”

As also stated in the representation at that time, the critical issue, as advocated by SPP, is the delivery of housing on the ground.

“It is well recognised by house builders, including MH, that lead-in timescales for marketing, preparing legal contracts, obtaining the necessary statutory planning consents and building warrant, as well as potential legal agreements and the time to construct on brownfield sites, with potential demolition and remediation/decontamination operations, and that the delivery of all of these sites within a 5 year period is unrealistic and highly questionable.

There are also privately owned brownfield sites in the Housing Land Supply and some of these can be regarded as in poor marketable locations. They also are in a disadvantaged position of not having a potentially discounted land value or the ability for investment in infrastructure that the Council owned sites may benefit from. Again, it is unrealistic for Dundee City Council to consider that all of these sites should be regarded as

effective and capable of delivery within the 5 year/Plan period.

The 2014 HLA identifies over 1,500 contested Council owned brownfield sites by Homes for Scotland and a further 900 houses on privately owned brownfield sites. The Reporter concluded after his Examination of the last LDP that “Dundee has a good track record of bringing forward brownfield sites for development” and that he “was satisfied that its focus on bringing forward further brownfield sites is well founded.”

The Promoters would like to suggest that while the redevelopment of brownfield land is well intended by the Council, the effective housing land supply is still biased towards brownfield sites which could otherwise be regarded as windfall sites.”

The MIR for LDP2 states that “In terms of the balance and choice of housing, the trends reported in the December 2014 Housing Monitoring data show that there continues to be a focus on developing brownfield land”. The MIR also continues to state that “the national economic climate has meant that this supply has not translated into new houses.”

This is disputed by MHL, as the position remains the same relative to the 2015 HLA, a position which is again supported by Homes for Scotland. The following evidence supports this position.

The Council acknowledges that it has only sold 2 Council owned sites for housing development in last 18 months (since LDP adopted). This would suggest it contradicts “the good track record of bringing forward brownfield sites for development”.

Across the allocated sites planning permission has been granted for over 1,000 new homes. Most significant is the grant of planning permission for the development of 650 houses at Western Gateway. Therefore, one site/location in the City accounts for 2/3rds all new houses granted planning permission since LDP1 was adopted. This does not assist with the provision of a range and breadth of housing sites in the housing land supply and this is likely to be detrimental to affordability as the supply will be regarded as being restricted to a small number of house builders, cornering the market.

Sites with the most inactivity are Brownfield – 2,268 units out of 3,652 units (62%) in the HLS of LDP1 (182 units are on greenfield sites (4%).

Only 379 units out of 3,652 units (10%) are on sites which are under construction.

Development has not commenced on 332 consented sites (8%) and 491 units (13%) relate to applications pending decision.

Furthermore, LDP 1 allocated 73 sites for housing development. In total these sites could accommodate 3,964 housing units. The above data as contained in the Monitoring Statement demonstrates that sufficient housing is clearly not being delivered as the supply does not contain the appropriate type (greenfield) and marketable locations of housing sites. In support of this, only a small and limited number of greenfield releases (10

applications – 2 were approved by Committee and 8 were approved under Delegated Powers) have taken place, including those allocated in LDP 1 (one of which relates to the 650 units at Dundee Western Gateway).

In terms of house completions, as the LDP 2 Monitoring Statement January 2016 states, annual completions have begun to rise again with a positive trend in 2013 to 2015 (the last 3 year house completions being 147, 168 and 210) and an increase in starts and developer enquiries, highlighting the improved lending market and a return in confidence to the house building sector in Dundee.

The MIR repeats this message by stating: “There are however strong signs that the housebuilding market in the city is beginning to improve with developer activity increasing across the city.”

Where new development has commenced housebuilders are reporting high levels of interest. In terms of the balance and choice of housing, the trends reported in the December 2014 Housing Monitoring data show that there continues to be a focus on developing brownfield land and that “This shows that the housing strategy of the LDP is beginning to be realised through development on the ground.”

While this upturn in the economy and housing market is welcomed and acknowledged, house completions are still very low and well below the approved Tayplan Projected build rate (320/yr) and assumed Build Rate 2012-2014 of 600 units/yr. (Refer to Figure 5 – Housing Completions by Tenure 2005-2015 and Figure 7: Annual Housing Completions from 2005 – 2015

Therefore LDP 2 needs to be more proactive and responsive to this upturn in market activity to help maintain the expected population increase and prevent any return to population decline in the future. Therefore, a Spatial Strategy relative to Housing in the Proposed Plan will need to be more ambitious rather than merely restating the current Spatial Strategy which is to focus on Dundee Western Gateway, brownfield sites and bringing forward existing allocated sites in the supply, if required, in order to deliver the housing needs over the next plan period.

As stated previously, the Council has an over-reliance on brownfield sites contributing to its HLS. This over-supply of brownfield sites is considered to have a number of different constraints which are, in essence, preventing the delivery of more effective housing sites, one of which is MHL’s promoted land at Pitkerro. While the targeting of brownfield sites for redevelopment is in line with SPP, this imbalance of an abundance of brownfield sites in the HLS requires to be addressed in order to attract inward investment from house builders to a City which clearly has a strong emphasis on economic growth and ensuring population decline does not return. Consequently, MHL contends that this stage of the LDP 1 review is the opportune time to redress this imbalance.

In addition, Windfall sites should not be included in the generosity calculation for the HLR. Consequently, the majority of brownfield sites should be removed from the supply, particularly those which are deemed to be constrained as per PAN 2/2010 and to treat their redevelopment as separate windfall sites outwith the supply calculations.

	<p>Response to the Preferred/Alternative Options in MIR</p> <p>It is proposed that a Hybrid of the Preferred Option and Option 2 should be adopted for the Proposed Plan in order to allocate effective greenfield sites to be developed in the 1st 5 years of plan. These should not be limited to specific locations, rather the sites should meet sustainable development criteria, SPP criteria on the 6 qualities of successful place and also having regard to the existing LDP policies on Place-making and design.</p> <p>The land being promoted by MHL at Pitkerro is recommended to Dundee City Council for allocation. The site represents a sustainable location for development and should be identified as a greenfield release for housing in the LDP 2 Proposed Plan.</p> <p>Further information is set out in the updated Development Framework Report which supports this representation.</p>
<p>42 – SEPA</p>	<p>SEPA do not comment on issues relating to spatial housing land capacity needs. However, we have commented on the environmental suitability of individual sites in respect of our environmental remit as part of our consultation response. We have provided comments on flood risk, the water environment and co-location with SEPA regulated sites. As part of the site assessment exercise we have identified sites which we can and cannot support due to unacceptable environment impacts, we have also highlighted sites which will require mitigation to avoid adverse environment effects. We have also identified some sites which are acceptable but will encourage you to include developer requirements to deliver environmental enhancements.</p> <p>In our response to the proposed spatial strategy we have detailed our support for the continuation of the existing strategy which promotes the reuse of brownfield sites for housing along with limited greenfield release. Therefore, our preference is for the preferred adoption to be carried forward into the Proposed Plan.</p>
<p>45 – H&H Properties (North Grange)</p>	<p>H&H Properties supports the continued preference for the reuse of previously developed brownfield land (and continues to develop The Waterfront Apartments at Riverside Drive) and in seeking to work with Dundee City Council, is supporting the preferred approach. To some extent this is because there is no 4th Alternative, promoting the allocation of additional land, <u>at this time</u>, to ensure the delivery of new homes in the rolling five-year LDP periods.</p> <p>Our support for the preferred strategy is therefore caveated by a strong belief that additional greenfield land is required immediately to generate new home completions and create momentum in Dundee for the delivery of the required number of new houses.</p> <p>LDP2 is anticipating over 4,000 units being delivered on brownfield sites within the plan period. This would see previously unseen levels of delivery of brownfield sites and all the inherent challenges this brings, not least the flooding of the market with similar type homes.</p> <p>This does not help in delivering a mix of house types to the area.</p>

It is highly unlikely (if not impossible) that 400 new homes on brownfield sites can be delivered each and every year in the plan period and as such (and still in keeping with the Spatial Strategy and the Preferred Option above) additional greenfield sites should be allocated to give a greater balance of delivery.

In addition, Dundee City Council employs a generous windfall sites assumption of 20%. This is unsubstantiated, either by empirical evidence of previous delivery, or by a thorough assessment of market conditions and potential windfall sites that would credibly justify a 20% allowance.

Moreover, it is likely that windfall sites, by their very nature, are more likely to be brownfield opportunities. Dundee is already looking to implement a strategy that placed a significant over-reliance on brownfield housing developments delivering over 85% of all new homes in the LDP period. By adding a further 20% to this figure, it places even more emphasis on this type of delivery method, and brings into question the strategy for meeting Dundee's housing land targets.

A more balanced approach, with a genuine mix of brownfield and greenfield sites will ensure far greater delivery of new homes and across a more credible and attractive mix of house types and tenures.

Dundee City Council has a duty to ensure a rolling 5 year land supply at any given time. This cannot be achieved with the current suite of housing sites, with a massive emphasis on existing brownfield opportunities (86%) and with 13% of the remaining 14% of new homes being delivered solely by the Western Gateway. Greater variety to ensure delivery is desperately needed.

As has been seen elsewhere in Scotland, the upshot of this approach is Dundee City Council being at significant risk a number of potentially significant residential development sites being secured via the planning appeal route. This removes the Local Authority from the decision making process and risks poor sites securing planning permissions, and Dundee growing in an unplanned and unwelcome way.

H&H Properties has continued to adopt the correct approach in promoting North Grange through the Local Development Plan on the basis that a plan-led approach must be supported and also in the belief that Dundee City Council cannot continued to rely so heavily on brownfield sites delivering much needed new homes to the extent assumed. However, we are disappointed that LDP2 has not, to this point sought to vary the type of sites needed to deliver challenging housing supply targets.

In allocating a wider range of new housing sites (including the land at North Grange Farm), the Council will not undermine the Preferred Strategy but will ensure the delivery of the required number of new homes within the plan period.

Brownfield development will remain at the very core of the Spatial Strategy and Preferred Option for the Effective Delivery of New Homes, as will the delivery at Western Gateway and the previously allocated sites, but it would be acknowledged that these sites may well straddle two, perhaps three LDP periods. This would represent a longer-term and more credible approach.

<p>47 – H&H Properties (Riverside Drive)</p>	<p>H&H Properties supports the continued preference for the reuse of previously developed brownfield land (and continues to develop at Riverside Drive).</p> <p>However LDP2 is anticipating over 4,000 units being delivered on brownfield sites within the plan period. This would see previously unseen levels of delivery of brownfield sites and all the inherent challenges this brings, not least the flooding of the market with similar type homes, a situation we are already experiencing in the completion, marketing and sales of units at The Waterfront Apartments on Riverside Drive a landmark development at a key gateway to the City Centre.</p> <p>There needs to be a far more balanced approach, protecting and promoting those developments already permitted whilst creating a proactive and enabling environment for future brownfield and greenfield development to meet challenging housing supply targets for Dundee.</p> <p>It is highly unlikely (if not impossible) that 400 new homes on brownfield sites can be delivered each and every year during the plan period and as such (and still in keeping with the Spatial Strategy and the Preferred Option above) additional greenfield sites should be allocated to give a greater balance of delivery.</p> <p>It is also imperative that those sites that do benefit from planning permission are supported and protected in order that they deliver <u>occupied</u> homes not just built ones. This is critical as an often overlooked issue. Housing demand is for houses with people and families living in them, not merely areas on maps capable of delivering new homes and apartments.</p> <p>Brownfield development will remain at the very core of the Spatial Strategy and Preferred Option for the Effective Delivery of New Homes, as will the delivery of new homes on previously undeveloped greenfield sites.</p> <p>H&H Properties feels strongly that additional greenfield sites should be allocated creating a more balanced approach to housing land supply and the delivery of new homes. This further allocation of land, taking pressure and expectation off the inordinately high reliance on brownfield land development will also enable those effective brownfield sites benefitting from planning permission with developers on board (such as The Waterfront Apartments on Riverside Drive) to move towards completion and not be faced by more and more competing sites being granted permission, a situation that floods the market and undermines the housing land strategy and significantly compromises the ability of Dundee to meet its housing land supply targets.</p> <p>It should be acknowledged that the current suite of sites in LDP1 may well straddle two, perhaps three LDP periods. Additional greenfield sites and a more realistic brownfield release and development strategy would ensure a longer-term and more credible approach enabling Dundee to meet its challenging housing supply targets.</p>
<p>51 – Stewart Milne Homes (Ballumbie 1)</p>	<p>Stewart Milne Homes supports a managed release of greenfield land to the east and west of the city to support the growth of Dundee and to provide flexibility and choice. It is noted that the Preferred Option suggests that this managed release of greenfield land may occur only in the second five-year period of the Plan. Whilst supporting this as a default position, Stewart Milne Homes submits that the local development plan should also consider the option of limited greenfield site release during the first five-year period, in order to achieve the</p>

vision, aims, and aspirations referred to in the Main Issues Report.

In April 2015, Stewart Milne Homes made representations at the Call for Sites stage.

A specific representation was made in relation to the site known as Ballumbie Village V. A copy of the Form and accompanying Report which formed that representation are attached to this representation.

The terms and content of the April 2015 representation as they relate to the site known as Ballumbie Village V, are adopted, in full, in support of this new representation at the MIR stage.

In addition, Stewart Milne Homes would wish to highlight the following points:

- Although the city council's promotion, and to some extent protection, of the Western Gateway is understood, experience elsewhere in Scotland suggests that the delivery of such a major land allocation is not undermined by the allocation of other greenfield sites but can, in fact, be stimulated by such additional allocations. When there is no competition to stimulate the larger growth area, there can, in certain circumstances, be a lack of momentum by landowners and developers, in the hope that values and prices will rise. A modest amount of competition from other sites can prevent this from happening.
- The city council's own monitoring notes an increasing demand for detached family houses within the city. Although it is possible that some brownfield sites will be suitable for such development, it is more likely that greenfield sites will deliver these types of developments. Once again, proper competition and choice will assist in meeting this demand, not only in terms of choice between developers but also in terms of choice between geographical locations. It is submitted that additional allocations to the east of the city would be best placed to respond to this context.

It is within this context that Stewart Milne Homes specifically promotes the site at Ballumbie Village V.

A redline plan delineating the site and a separate plan showing an indicative layout are submitted in support of this submission.

It is estimated that the site is capable of accommodating approximately 50 units.

Stewart Milne Homes considers that any constraints relating to the site can be removed or mitigated if the site were to be considered suitable for a potential allocation. In this regard, Stewart Milne Homes requests discussions with the city council before the preparation and finalisation of the Proposed Plan.

It will be noted that the eastern-most section of the site identified crosses the boundary into the area administered by Angus Council. For this reason, and by way of background information, a copy of a submission by Stewart Milne Homes to Angus Council (April 2015) (relating to the Proposed Plan for that area) is submitted with this representation.

<p>52 – Stewart Milne Homes (Ballumbie 2)</p>	<p>AS ABOVE with additional comment below</p> <p>It will be noted that the proposal for the Ballumbie Village V Phase 2 is on golf course land. The golf course has become financially unviable in its current form. However, it is considered possible that the golf club facilities could be reconfigured as a viable nine-hole course with related leisure facilities for families and children if the land identified in this representation were to be allocated for residential development. The allocation of the site promoted in this Representation could therefore assume the status of enabling development to achieve wider community purposes. Stewart Milne Homes considers this to be a relevant factor in the consideration of this site and requests further discussions with the city council to explore this further.</p>
<p>53 – RSPB</p>	<p>All of the options (preferred and alternative) include a proposal to continue with the current brownfield led approach to housing land supply. RSPB Scotland welcomes this approach and brownfield sites are generally preferable to greenfield sites in terms of accessibility and infrastructure.</p> <p>RSPB Scotland notes that the SEA highlights that proposals in the east could impact on internationally designated nature conservation sites. All proposals should be subject to a Habitats Regulations Appraisal and consultation sought with SNH at an early stage. Any cumulative impacts should also be considered.</p> <p>The possibility of adapting, enhancing and managing brownfield sites (or part of them) as a green infrastructure asset for the benefit of wildlife and the local community and as an alternative to high density development should also be considered. It would be useful if this main issue had cross-referenced the Dundee Green Network map that was consulted on in 2015. Both the Western Gateway and Linlathen are highlighted as green network areas, both sites also contain several local Sites of Nature Conservation (with a higher concentration in the east) and the impacts on these need to be considered. Paragraph 40 of Scottish Planning Policy emphasises the need to consider whether the permanent, temporary or advanced greening of all or some of a site could make a valuable contribution to green and open space networks, particularly where it is unlikely to be developed for some time, or is unsuitable for development due to its location or viability issues.</p>
<p>55 – Scottish Enterprise (Commenting as landowners)</p>	<p>SE wish to promote their lower plateau landholding that extends 17.67 Ha as a residential development proposal in LDP 2. SE submitted the lower plateau site during the ‘Call for Sites’ in 2015 and at this initial point raised its potential for future residential use. This fact is recorded in Figure 5 of the MIR.</p> <p>Scottish Planning Policy requires a generous supply of effective housing land and the creation of success places. New and high quality housing is sought to meet the needs and demands from Scotland’s growing population.</p> <p>There is a requirement for planning authorities to allocate effective housing sites in the first five year period of the plan and also sites that are expected to become effective in the second five year period of the plan, up to 10 years after adoption.</p> <p>TAYplan advocates that there requires to be a continuous supply of housing land for new homes to meet the need of existing and future residents of the area.</p>

SE support the approach of Dundee City Council to seek to minimally meet an overall housing target of 480 units annually with a 20% buffer that results in a housing requirement of 576 units per annum.

In terms of estimated completions it is considered that the SE site should be allocated in the LDP 2 to ensure that the completion rates required, 576 units per annum, are attained. This is put into perspective by the indication that the average completion rate will be 304 units per annum from 2015-18 inclusive.

It is considered that the additional housing land requirement places undue weight on the scale of the potential established supply coming forward at over 4,000 units and 20% of the housing requirement being met by windfall sites, totalling 1152 units. Drawing these matters together SE believe that the additional housing land required exceeds the stated number of 269 units and that this is a further consideration in allocating the SE landholding.

SE believe that the 'Development Framework' document submitted in support of the potential allocation for residential development at the lower plateau site at Balgarthno will assist the Council in considering their landholding and inform the Council's site assessment. SE has submitted supporting information to demonstrate that this site can also add to the growth and success of the Western Gateway as a new housing area within Dundee and due to its location it can positively link and connect into, in place making terms, this new growth area of the City, sustaining its expansion over the plan period.

The Council indicate that their preferred option for LDP 2 for greenfield housing land release is two existing allocated sites from LDP 1 and that taking account of the completions expected to flow that there is no requirement for further greenfield release in the LDP 2 first five year period. SE believe that their landholding will offer greater flexibility in meeting the housing land requirement and as it lies within the preferred strategy area it should be allocated for residential development to come forward between 2018-23, the first five year plan period.

The Council do recognise the requirement for greenfield housing land release in the second five period from 2023-28 in both the west and east of the city. This is consistent with Scottish Planning Policy (SPP) paragraph 119;

Taking account of the SPP requirements and the MIR stating that greenfield sites are required in the west of the city within the 10 years from adoption, SE would wish that their landholding at Balgarthno is allocated within the LDP 2 for residential development for the lower plateau site.

The Preferred Strategy Option is supported by SE, this will require the release of greenfield housing sites in the west of the city that the landholding at Balgarthno can meet within 10 years of adoption. It is considered that the site could be effective in the first five years and could contribute to meeting the housing requirement in the city, if other sites stalled or failed to come forward in the manner envisaged. This would provide additional flexibility to the housing land supply in the city over the LDP 2 plan period.

56 – Historic Environment Scotland	<p>In terms of the preferred option, we understand that the supply of land for housing will be based on the bringing forward of the existing spatial strategy from the adopted LDP, supplementing this with further release of greenfield land. In general we are content with this approach to the spatial strategy. However, the potential impact on the historic environment of the managed release of greenfield land to the east and west of the city is dependent on which sites are to be released. A number of sites identified in the Call for Sites either contain nationally important historic environment assets (scheduled monuments) or have the potential to impact on the setting of these and other historic environment sites such as Category A listed buildings. In the absence of a preferred option of which sites to bring forward, an indication of housing numbers for these sites and an environmental assessment we consider that further clarity is required on the proposed spatial strategy for housing. Further details on this issue can be found in our comments on the Environmental Report.</p>
61 – TACTRAN	<p>This will encourage developments in locations which can accessed by a variety of travel modes and reduce dependence on the private car.</p>
Support Alternative Option 1	
02 – Inverarity Farms Ltd	<p>It is considered that the Council should pursue with Alternative Option 1 in the emerging LDP, which would allow a managed release of greenfield land to the west of the City and support the growth of Dundee.</p> <p>Our client welcomes that the LDP looks to provide a managed release of greenfield land to the west of the City which will provide flexibility and choice.</p> <p>Springfield Homes proposes the development of 365 houses, forming part of a new village located on the western edge of Dundee. The site is bounded to the east by Dykes of Gray Road and Gray Walk to the north. As part of the application is an associated village centre which will include Class 1 retail in addition to play space, landscaping and infrastructure works.</p> <p>It is considered that the area directly adjacent to the Springfield Homes site is suitable for residential development and should be included within the emerging Dundee Local Development Plan 2. Development of the site will form a natural extension to the Springfield Homes planning approval.</p> <p>Section 2 of the Main Issues Report considers the Delivery of New Homes and discusses Policy 4 of the Proposed SDP.</p> <p>We welcome that the plan looks to assist in the delivery of 25,020 homes up to year 2028 across the Tayplan area.</p> <p>It is noted that the Tayplan-wide Housing Needs and Demand Assessment (2013) anticipates that there will be a steady demand for high quality housing within Dundee City. The Council acknowledge further that there is a need to provide further choice to the market by increasing the availability of family housing.</p>

	<p>Further development at the Western Villages, will contribute to the delivery of new housing and increase the availability of high quality family housing. Development of the site will contribute to the effective supply of land for housing.</p> <p>The Plan notes at Page 26 that since the adoption of LDP 1 there has been significant progress in the development of the Western Gateway. The proposed strategy for LDP 2 will be to continue to provide housing choice in brownfield locations throughout the City as well as at the greenfield locations at the Western Gateway, the east at Linlathen and to the north of the City at Baldragon.</p> <p>The Council advise further that the projected completion rates for the approved developments at the Western Gateway will make a significant contribution to the housing land requirement over the lifetime of LDP 2.</p> <p>It is considered that the area to the west of the proposed South Gray Village is suitable for residential development and forms a natural extension to the recently consented scheme. The development of this site would contribute to the retention of Dundee’s population over the plan period and into the longer term.</p>
09 – Broughty Ferry Community Council	<p>There is concern that currently north of the A92 there are disparate groups of housing with little connectivity and with inadequate infrastructure and facilities (schools, public transport, shops, medical access). This situation will be exacerbated by the addition of already approved housing (at least 150 houses at (H71) Linlathen and probably 31 dwellings at Clearwater View (15/00664/FULL)).</p> <p>For further approved greenfield housing to be contemplated in this location this issue must be addressed. In the last paragraph on page 28 of the MIR the relevant issue of Infrastructure is mentioned (“The need for the Council and developers to address these deficiencies will be highlighted in the Proposed Action Programme along with details of expected developer contributions.”). The sort of problem that may be encountered is the financial provision for a new primary school. Currently the developer contribution for schooling is £4810 per unit and a new school may cost £9 million. Therefore, for developers alone to cover the cost would require 1871 units. In view of the fact that just an extra 279 units are proposed for the whole of Dundee after 2018 it seems that there would have to be a high Council contribution. And this is just for a school.</p> <p>Consequently much more thought (and evidence of the likely way forward) needs to be provided before we could support the preferred option (see also under ‘Other Comments, last paragraph).</p>
11 – Dundee Civic Trust	<p>The Council should consider whether there is a need to continue to allocate greenfield land at Linlathen and to the east in the light of the “rogue “ development approved north of Monifieth, which it could be argued more than meets the need in the east.</p>
27 – Strategic Land Scotland Ltd	<p>Whilst not supporting the “<i>current brownfield approach</i>” included in the preferred and alternative options, of the choices offered Strategic Land (Scotland) Ltd support <i>Alternative Option 1</i> which seeks to “<i>In the second five year period of the Plan allow a managed release of greenfield land to the west of the City only to support the growth of Dundee and to provide flexibility and choice.</i>”</p>

	<p>This support is with the proviso that land at Linlathen and Baldragon are confirmed as being effective.</p> <p>Strategic Land (Scotland) Ltd has no particular issue with the principle of a brownfield led approach, just not the 'current' one advanced by the Council.</p> <p>The Council should be aware and indeed must accept that recent and current rates of housing delivery within the City have fundamentally failed to delivery anything like the housing requirement set out in TAYplan. Although the proposed TAYplan 2 sets a lower annualised requirement, there is no realistic prospect of even the lower housing requirement being close to being met. Indeed, it is the case that the Council, as required by Scottish Planning Policy, have not maintained a 5 year effective land supply for some time now.</p> <p>It is Strategic Land (Scotland) / Iain Bett Esq's position that there is a fundamental requirement for non-effective land, whether it be brownfield or greenfield, to be removed from Dundee City LDP 2. In its place additional effective land, which inevitably will require to be greenfield given the amount of non-effective brownfield land currently allocated within the Dundee LDP, should be identified for housing purposes.</p> <p>In stating this, it is necessary to note that there is a limited amount of greenfield land within the city boundary; some of which is not well suited to future housing land allocations.</p> <p>In considering the most appropriate strategy going forward, Strategic Land (Scotland) Ltd / Iain Bett Esq, suggest that for a number of sound planning reasons including the fairly recent planning approvals in South Angus (at Monifieth and at Strathmartine Hospital) that to balance this out it should be land to the west/north west, including land at South Auchray, which should be considered for further 'village' style housing land allocations.</p> <p>The merits of an allocation at South Auchray are included in the supporting report which was submitted to the Council at the 'Call for Sites' stage. If necessary, further copies can be made available to the Council.</p>
33 – Philip Duncan	<p>The road network at the east side of Dundee is already struggling to handle the volume of traffic heading towards Dundee at peak periods. At 'school run' times the traffic already backs up along Balgillo Road East onto the Arbroath Rd dual carriageway at the Clearwater roundabout. The traffic lights at Claypotts junction are an obvious bottleneck with traffic often extending back to, and across, the Clearwater Roundabout. Beyond that, the single lane traffic flow towards Strips of Craigie roundabout is obstructed by the volume of traffic and</p> <p>the pedestrian crossing serving Craigie High School. These are all existing issues that require to be addressed as it stands today and will only be made worse by increasing the volume of traffic heading into Dundee from the east. From the west side, Dundee can at least be accessed by dual carriageway to a large part of the city. It should be noted that the availability of public transport, from any area located close to the dual carriageway to the east of Dundee, is very poor. At the east side of Dundee I would be very surprised if both Forthill and Barnhill Primary Schools would be able to cater for large intakes from the new housing.</p>
Support Alternative Option 2	

<p>43 – Ristol Consulting Ltd</p>	<p>Ristol Consulting Ltd support the continued allocation of site H72 'Land east of Strathyre Avenue' within LDP 2 for housing, with the total number of units determined by the site's capacity.</p> <p>The site forms a logical extension to an existing residential area and is well contained along its boundaries. The site is effective, meeting the 7 criteria laid out in PAN 2/2010.</p> <p>It is noted that LDP 2 Appendix 2 references site H72 as a brownfield site, however the site is greenfield.</p>
<p>44 – Mr J Thompson (Ristol)</p>	<p>Whilst Ristol Consulting Ltd has chosen the alternative option we would point out that SPP (paragraph 110) requires the planning system to maintain at least a 5-year supply of effective housing land at all times and policy 5 of Tayplan advocates a 7-year supply. Ristol Consulting Ltd consider that whichever spatial strategy is selected, the most important thing is that it is capable of being delivered and offer range and choice. This means identifying a range of sites in marketable locations (in line with the plan objectives) that are genuinely effective or capable of becoming effective and delivering homes within the LDP and SDP timescales. Ristol Consulting Ltd therefore request that land at North Grange as shown on the attached Plan 1 is allocated within the LDP for an immediate housing site targeting custom build to widen the range and choice of new land for housing with Dundee consistent with the aims of the SPP and indeed policy thrust of the plan. This reflects the submission made to Main Issues 1 Proposed Spatial Strategy.</p> <p>Whilst Ristol Consulting Ltd acknowledge that there is a reasonable presumption in favour of developing brownfield land this should not be to the expense of promoting a good range of sites which include greenfield land across the city. The main issues report represents an opportunity to explore what the actual housing land requirement of Dundee City should be taking into account an updated HLA that only has sites that are effective, viable and in areas that people want live in.</p> <p>Ristol Consulting Ltd would request that the Council review the current HLA (2015) so that this is only populated with those sites that are effective and based on a robust criteria that has been agreed with by Homes for Scotland and its members. We note Homes for Scotland have calculated that 32% (507 units) out of a total of 1598 of all sites as set out in the HLA are not considered to be effective. Land at North Grange is effective and can be delivered within the first 5 years of the Plan period, extending the range of choice of new housing provision within Dundee through the inclusion of custom build.</p>
<p>62 – Kirkwood Homes and Linlathen Developments</p>	<p>We raised some concerns under Main Issue 1 that the effective housing land supply (HLS) comprises a disproportionate supply of brownfield land (87.5%) compared with greenfield land (12.5%) and that this could undermine delivery of the Council's spatial strategy. In addition, a large proportion of the current effective brownfield HLS, approximately 46%, comprises sites rolled forward from previous Housing Land Audits which were expected to be completed by 2015, but which have not yet commenced.</p> <p>We would therefore fully support the release of new greenfield land to the east of the City at Linlathen to alleviate potential future delivery issues in the HLS and improve future annual housing completion rates, which as stated under Main Issue 1 are currently well below that required to achieve either the approved or proposed TAYplan HLR.</p>

Within this context, we support Alternative Option 2 and the allocation of greenfield land at Linlathen for 270 homes in the first period of LDP2, that is from 2018-2013, and the managed release of further housing land in the second five year period of the Plan and beyond. We would support a phased and design led approach to the future development of the land, in consultation with the Council and the community, to support the growth of Dundee and to provide flexibility and choice in housing provision. In support of initiating and developing a long-term vision for the future of Linlathen, an Initial Development Concept Framework has been submitted with the MIR representations, together with Site-Specific submissions.

It is considered relevant in terms of the effective delivery of housing that there is strong market demand for housing to the east of the City. This is demonstrated by the recent planning approvals at Monifieth at Ashludie Hospital and Land West of Victoria Street. Clearly these sites are located in Angus and it is considered that housing demand within the City would also be satisfied through greenfield releases within the eastern City boundary.

We do recognise that a balanced release of land will be required around the City, but consider that LDP2 should now prioritise new greenfield land releases to the east of the City firstly, to fulfill the housing land requirement, secondly, to locationally rebalance the concentration of current greenfield housing to the west, and thirdly to deliver effective new high quality housing and a mix of housing type, size and tenure to meet the needs and aspirations of a range of different households throughout their lives. In summary, we consider that land at Linlathen, to the east of Dundee, should be allocated for residential and community uses in LDP2 as it is capable of fulfilling the planning objectives and vision of the Plan, for the following reasons:

1. Housing Land Requirement and Supply

The LDP2 currently requires to conform with the requirements of Policy 5: Housing of the TAYplan, approved in 2012, which identifies a 5 year effective Housing Land Requirement (HLR) of 3,050 units. The Dundee Housing Land Audit (HLA) 2015 identifies a 5-year effective Housing Land Supply (HLS) of 3,162 houses and therefore the adopted TAYplan requirements for this period are being met. The 7-year HLR from 2015 of 4,270 units is also met with a HLS of 4,449 units up to 2022, however there's only currently a 7.8 year HLS and therefore LDP1 does not allocate sufficient land to meet the HLR up to year 10 as required.

Having regard to the above, the current HLS is quite 'tight' in relation to the 5 and 7 year HLR, and does not provide for a 10 year HLS. As a result, the HLS appears to falter in its accordance with the Policy 5 requirement that LDPs shall "have the flexibility to plan for house building rates in Dundee City to exceed the level of annual provision in Proposal 2."

Within the above context, whilst we support the review of the HLR through LDP2, and the suggestion on page 16 of LDP2 MIR to increase the Proposed TAYplan Housing Supply Target (HST), of 480 units per annum, by 20%, that is, to a 576 HLR per annum, a 20% increase in the Proposed TAYplan HLR of 528 units per annum to 634 units per annum would be preferred. This more generous approach would provide further choice and flexibility in the delivery of the HLS.

A HLR of 576 units per annum equates to a 5-year HLR of 2,880 homes and a 10-year HLR of 5,760 homes from 2018, which is the anticipated adoption date for LDP2. The Dundee HLA, 2015 identifies the supply

between 2018 and 2022, that is, over a 4-year period and then groups together the remaining supply under 'later years'. The total effective HLS identified in the HLA 2015 from 2018 – 2022 + Later Years is 3,029. This equates to a 5.3 year effective HLS.

The Proposed TAYplan requires the new LDP 2 to allocate new housing land to accommodate a continuous 5 years effective land supply at all times, and a 10 year supply from adoption. The proposed TAYplan 10 year HLR is 5,280 and there is currently a shortfall in the effective HLS of 2,251 units. LDP2 MIR suggests a new more generous 10-year HLR of 5,760, against which there would be 2,731 units.

It is considered relevant, in terms of LDP2 to have regard to the strategic policy requirement of maintaining an 'effective' 5- year HLS at all times and 10 year housing land supply from the date of adoption. However, as Table 1 of the LDP2 MIR refers to the 'established' HLS, thereby masking the effective HLS available, which is much lower, as a result Table 1 calculates the need for only 269 additional units over the 10-year period. This requirement is queried firstly, in terms of its method of calculation and secondly, it is considered that the lack of new additional housing land required will fail to address the underlying issues regarding the delivery of the current effective HLS.

1. *Comments on LDP2 MIR Table 1: Housing HLR Calculation*

- Page 16 of LDP2 MIR suggests an average annual completion rate over the period 2015-2018 of 304 units, that is, 912 in total. However, this does not reflect the annual average completion rate, identified in the 2011-2015 HLAs, which equates to 252 per annum over the last 5 years. Projecting this forward from 2015-2018 would result in 756 completions, which is 156 units less than the MIR's overstated projection of 912.
- We would also query the justification for a windfall rate of 20%, which appears relatively high.
- For the reasons stated above, we would support the use of the effective HLS as opposed to the use of the established HLS. This approach is considered to be supported by the Scottish Government and advice contained in paragraph 55 of PAN 2/2010 on Affordable Housing and Housing Land Audits which states "...The aim is to achieve a realistic picture of the available effective land supply which can contribute to the housing requirement so that the level of additional housing, and therefore land needed to meet the overall requirement, can be established."
- We would welcome further discussion and clarification on the content and output of the Table.

2. *Comments on the Deliverability of the Effective HLS*

- As stated above, our comments on the spatial strategy referred to concerns over the disproportionate supply of brownfield land contributing to the 5-year effective HLS in the City, with only 12.5% of the units being on greenfield land compared with 87.5% on brownfield land.
- Looking at the HLAs from 2011 to 2015, all of the current effective greenfield land was identified in the 2011 HLA to commence in 2012-2013. In practice, the strategic allocations to the west have only just commenced on site, and whilst this is positive in terms of delivery, the City has not had the benefit of greenfield housing choice for some time, not least as no additional greenfield allocations or approvals, have become available with the limited exception of Baldragon, in the intervening periods, that is, from 2011 to date. The immediate release of greenfield land and medium/longer term greenfield land to the east of the City, at Linlathen, in LDP2 would support and augment further flexibility and choice in housing provision.

- As noted under our comments under Main Issue 1, the 2011 to 2015 HLAs also indicate a significant slippage in the past delivery of Brownfield land within the City. A total of 1,277 homes anticipated for completion by 2015 on brownfield sites in the City have not actually commenced. These sites have now been rolled into the current 5-year effective housing land supply (HLS) and account for approximately 46% of the supply of brownfield sites. In addition, the housing completion rates since 2011 are well below the TAYplan (approved 2012) housing land requirement (HLR) of 610 units per annum, with 437 homes completed in 2011, 299 homes in 2012, 147 homes in 2013, 168 homes in 2014 and 210 homes in 2015.
- In practice, the annual housing completion rates confirm that the anticipated programming of a substantial number of brownfield sites has been over optimistic. Paragraph 57 of Scottish Government Planning Advice Note 2/2010 on Affordable Housing and Housing Land Audits states that "...it is important that assumptions do not overestimate the likely completions, as the audited effective supply forms the basis for the calculation of the additional housing land requirement to be provided through the development plan."

In summary, we would support the allocation of immediate and medium/longer term greenfield land to the east of the City, at Linlathen, in LDP2. The development of this land would not only assist in fulfilling the HLR for the City, and providing much needed new homes, but also ensure continued flexibility and choice in housing provision on land where there is a national housebuilder commitment to delivering new homes. In addition, the allocation of land at Linlathen can also seek to achieve the requirements of Proposed Policy 4: Homes, part C, to ensure that the mix of housing type, size and tenure meets the needs and aspirations of a range of different households throughout their lives.

2. Housing Location and Type: Flexibility & Choice

In addition to providing an effective HLS, Policy 4: Homes of the Proposed TAYplan also requires that the mix of housing type, size and tenure is provided to meet the needs and aspirations of a range of different households throughout their lives. It is considered that this can only be realistically achieved by addressing the disproportionate balance of greenfield and brownfield land in the City. As previously stated in these submissions the Dundee Housing Land Audit, 2015 identifies that only 12.5% of the HLS is on greenfield land, but that the most significant supply of new homes will be delivered, that is, 87.5% from brownfield land.

It is considered that the supply of proportionate split of 1:7 greenfield/ brownfield HLS will fail to deliver to deliver planning policy objectives to provide for a mix of housing type, size and tenure across the City. Many of the brownfield sites are located within the built up area and there are constraining high costs in the redevelopment of these sites compared with greenfield locations. From an analysis of the Housing Land Audits over the last 5 years, it is clear that there is significant slippage on the programming of many of the brownfield sites across the City, equating to approximately 1,277 homes, which were anticipated for completion by 2015 and which have not yet started.

The allocation of new greenfield land to the east of the City will assist in achieving flexibility and choice and redress/rebalance the spatial strategy for greenfield releases across the city which has been predominantly concentrated to the west of the City. Allocating new greenfield releases in the new LDP2 to the east allows for choice across the City with the Western Gateway well under way.

The Dundee HLA, 2015 identifies that from the date of adoption of the LDP2, that is 2018, the existing greenfield housing supply equates to only 446 units, all located to the west of the City. The HLA also indicates that there is no greenfield housing land supply currently available for the second period of LDP2, that is 2023-2028, with the Western Gateway projected for completion in 2023. The range and choice of housing would therefore be supported by new greenfield allocations to the east of the City.

There is not only an emerging shortfall in the effective HLS, but also a decline in the greenfield HLS with no greenfield sites available at all in the second 5-year period of LDP2. In addition, there is lack of choice in the location of the greenfield HLS in the first 5-year period of LDP2 with all such land being essentially located to the west of the City. The allocation of land at Linlathen, to the east of the City, for new housing within the first and second 5-year periods of LDP2 would satisfy this shortfall as well as delivering new high quality housing, with a range and choice of housing type, size and tenure.

High Quality Housing & Delivering a Mix of Housing Type, Size and Tenure

It is considered that the allocation of greenfield land at Linlathen for new housing and community uses will fulfill the qualitative planning policy requirements for new high quality development and sustainable economic growth. The location of the site adjacent to the Linlathen Strategic Development Area allows for new and complementary housing and community uses adjacent to this existing employment strategic development area, facilitating a mix of land uses which can be guided through the masterplanning process to ensure high quality design and a mix of new housing type, size and tenure.

Our client is committed to achieving and delivering high quality new housing on this site, together with community uses, through the masterplanning process. A Site Specific submission and an Indicative Development Concept Framework have been submitted within this representation in support of the future vision for the development of land at Linlathen.

It is considered that the above approach supports national planning policy objectives contained in both NPF3 and SPP that “We live in sustainable, well-designed places and homes which meet our needs.” Outcome 1 of SPP (2014) requires planning to achieve “A successful, sustainable place – supporting sustainable economic growth and regeneration, and the creation of well-designed, sustainable places.” It is intended to develop the masterplanning framework around these national planning objectives.

Policy 8: Housing Land Release of the Dundee Local Development Plan, 2014 states “*Housing land release on brownfield sites, in addition to the allocations set out in Appendix 2, may be acceptable where it can be demonstrated that it will improve the tenure mix in an area where existing choice is limited and would make a positive contribution to the regeneration objectives of the area.*” *Linlathen (Ref: H71(2)) is identified in Appendix 2 of LDP1 as a suitable greenfield site for release in the second 5-year period of the LDP between 2020-2024 for 150 houses.*

We would support bringing this site forward into the first period of LDP2, that is 2018-2023 and consider that by bringing the site forward by 2 years and increasing its density to 270, this will assist in not only augmenting the

	<p>effective HLS, but also delivering high quality housing and a mix of housing type, size and tenure.</p> <p>The site area is already allocated for residential development in LDP1 and the principle of residential development on this land has therefore already been accepted. LDP1 underestimated the development capacity and, through further detailed site appraisal, it is considered that an additional 120 units on greenfield land in the first 5-year period of LDP2 should be supported on this site. It is considered that the increase in density should be supported given the existing development plan status of the site, the emerging lack of generosity in the housing land supply, the limited availability of greenfield land in the City and the fact that the scale of development is appropriate to the site area designated.</p> <p>It is relevant that land to the east of the City has proven market success for delivering development in the short, medium and long term. The eastern end of Dundee, along the A92 corridor, offers opportunity to provide alternative, sustainable sites for housing development, whilst also looking at the masterplanning function of the east of Dundee as it currently stands. Additional land release within this area would afford an opportunity to create better links with existing development and provide the opportunity to create a sustainable pattern of development in accordance with SPP objectives.</p> <p>In summary we would support additional greenfield land releases to the east of the City, at Linlathen, not only to address the HLR, but also to provide for a range and choice of sites in the City and to deliver high quality new housing, with a mix of house type, tenure and size.</p> <p>Further detail on the future vision for Linlathen including the scale and development concept are provided in the supporting documents, which form part of our client's submissions on the MIR.</p>
<p>Support Alternative Option 3</p>	
<p>15 – Professor A R Grieve</p>	<p>There should be no further development of greenfield sites to the east of the City</p>
<p>34 – West Green Park Residents</p>	<p>There is now major development occurring in the Western Gateway, with all allocated sites now permitted at maximum capacity.</p> <p>The Dundee Local Plan Review 2005 set out the original ethos for the Western Gateway development to be for a <i>'small number of discrete but linked communities with supporting facilities that are accessible by a range of means of transport. This form of development will allow the separate identity of the existing villages in the Dundee Western Gateway area to be maintained, by avoiding coalescence.'</i> (p.24).</p> <p>We feel it is imperative that the Western Gateway does not lose the ethos of the original vision. Further release of land for additional housing would result in one sprawling mass of housing, rather than maintain the idea of a smaller-scale village community.</p>

	<p>What is most important is that the community facilities required to develop a sustainable community in this location are brought forward. In particular, the local retail facilities, community and recreational infrastructure (such as the village hall), and education facilities (imperatively – a local primary school, for which the education payments from Springfield have been ring-fenced).</p> <p>There are two former NHS sites adjacent to West Green Park (to the North East and North West), and given that these are already being marketed for housing, we would suggest that it would make more sense for these to be brought forward formally as brownfield sites for development – either as housing (potentially for the elderly – please see our comments below) or potentially as a site for the new primary school. This would be better than to releasing further greenfield sites elsewhere in the Western Gateway, which are currently prime agricultural land. It would be preferable if the NHS sites could be developed in consultation with the West Green Park Residents and Proprietors Association (WGPRPA) as the sites directly about our estate.</p> <p>We strongly oppose any further housing permission on Site H69, as the developer now has permission for 100 houses – the full amount allocated in the Local Development Plan. Leaving the remainder of the site without housing is essential to allow for green corridors and movement of red squirrels, as well as providing recreational area for residents of new development on Site H69.</p> <p>It currently feels as if the Western Gateway is developing as a reaction to developers' individual <i>ad hoc</i> proposals as they are submitted, rather than with an overall Masterplan and vision. This seems to be a missed opportunity. We feel it would be beneficial to have an overall Community Plan with monitoring, including the establishment of a) transport, b) civic hub, c) education, d) health centre, e) public art, g) green infrastructure, and any other topics required to help create a vibrant community spirit.</p>
37 – Catherine Duncan	<p>As a resident at the East of the City with young children accessing Primary Schools, I have significant concerns about increasing housing nearby. My concerns relate mainly to the infrastructure that currently exists being at capacity. Further housing developments would stretch resources further. Our catchment schools are Barnhill Primary and Grove Academy. The road system is inadequate and dangerous at present. On most mornings the traffic queuing at the Balgillo Road East/Balgillo Road junction tails back onto the A92 dual carriageway. This is frequently dangerous as drivers become frustrated and late due to the unpredictable traffic patterns. The capacity of the schools, particularly looking to the future and my children's attendance at Grove Academy, also causing me concern.</p>
50 – Stobswell Forum	<p>Since there has been no activity on allocated sites for 2,450 units of which 2,268 are on brownfield sites, effort must be concentrated on these sites to bring them to early completion. Only then should further greenfield sites be released. This effort should include, if necessary, the acquisition of sites where the present owners show no eagerness to develop them. Then these sites could be released to willing developers with rigid timescales for development implementation. The continued release of greenfield sites can only result in the inner city brownfield sites being neglected, ignoring their advantages in terms of increased sustainability, reducing journey times, reducing car usage and increased access to public transport. In addition the Forum seeks the removal of the housing allocation applied to the Maryfield Tram Depot site and its replacement with an</p>

	allocation for cultural use to reflect the current situation with the Dundee Museum of Transport.
57 – Friends Of The Earth Tayside	Given the continued intrusion into the greenfield margins of Dundee, we believe that there should be a Green Belt for Dundee including most of these margins along with neighbouring areas of adjacent local authorities.
No Preferred Option	
13 – Scottish Government	<p><u>Housing Land Requirement & Proposed SDP2</u></p> <p>We note that Main Issue 3 refers to the Dundee City housing supply target and housing land requirement set out in the in the Proposed Strategic Development Plan (SDP2). To address the requirements of Policy 4 € of the Proposed SDP2 you intend to include an additional 20% to the SDP housing supply target (528 units). This results in a housing land requirement of 576 units per annum (5,760 units for the 10 year period of 2018-2028).</p> <p>It would be helpful if the Proposed LDP provided background information and justification of why this figure (576 units per annum) has been chosen.</p> <p>With regards to using figures from the Proposed SDP2, you will be aware that LDPs are required by legislation to be consistent with the SDP that is in place at the time which the LDP is adopted. We note that your LDP is scheduled to be adopted after SDP2 is approved.</p> <p>When considering how to present housing figures in your Proposed LDP you may wish to refer to the recently published Draft Planning Delivery Advice on Housing and Infrastructure which includes advice on this matter.</p> <p><u>Affordable Housing</u></p> <p>The Main Issues Report lacked detail of how much affordable housing will be required in the Proposed LDP. We note that Policy 4 of the Proposed SDP2 highlights that LDPs should include provision of an appropriate level of affordable housing defined on local needs. This is set at 25% for the whole Tayplan area in the Proposed SDP2, which notes that this may vary between housing market areas and local authorities.</p> <p>The Proposed LDP should therefore clearly set out the amount of affordable housing that is programmed to be delivered in the period 2018-2028. For example, the annual and total Housing Land Requirement should be separated into market housing and affordable housing. A clear explanation should be provided to explain the background for the chosen figures.</p> <p><u>5 Year Effective Land Supply</u></p> <p>The Proposed SDP2 requires that a minimum of 5 years effective land supply should be ensured at all times. We note the MIR highlights that Policy 8 ‘Housing Land Release’ of your adopted LDP, may require to be</p>

	<p>replaced or significantly updated. When updating this policy you may wish to consider the Draft Planning Delivery Advice on Housing and Infrastructure which provides advice on this matter. In particular paragraph 26 states that “<i>Planning authorities may wish to consider including a ‘flexibility policy’ in development plans to set out how individual proposals will be considered where a shortfall in the 5 year supply of effective housing land supply emerges – as evidenced by the Housing Land Audit. Such a policy can provide criteria for considering proposals for housing on land which is not allocated in the development plan. It may also include support for sites that are identified for the longer term but which could be delivered earlier and address infrastructure constraints</i>”.</p> <p><u>Transport Scotland – Site Specific Comments</u></p> <p>With regard to LDP2 MIR site assessment information, the Scottish Government can offer the following site specific comments around transport issues, which have been provided by Transport Scotland:</p> <p>In relation to the sites identified as MIR 75, 76, 77, 86, 90 and 99 – we consider that the cumulative impact of development on the A90(T) Swallow roundabout requires to be determined. Although we note that the Council has agreed mitigation measures at Swallow roundabout based on 800 residential units at the Western Gateway. Further development at this location which exceeds the agreed figure will require an appraisal of the potential impact on the trunk road network and, if required, the identification of further suitable mitigation. You should discuss the potential access strategy for site MIR 99 with Transport Scotland.</p> <p>With regard to site MIR 83, it is considered a Transport Appraisal will be required which examines any potential impact to the A90(T)/A923 (Coupar Angus Road) grade separated junction.</p> <p>For the following sites, MIR 74, 79, 80, 81, 82, 87, 91 and 98, a Transport Appraisal considering the cumulative impact on the A972(T)/A92 Greendykes roundabout will required. There is the potential for the circa 1,500 units and employment uses identified to adversely impact the safe and efficient operation of the trunk road network depending on traffic routing and dispersal. The potential access strategy for MIR sites 80 and 91 should be discussed with Transport Scotland.</p>
<p>17 – Taylor Wimpey / AWG</p>	<p>Taylor Wimpey / AWG are disappointed that there is not the opportunity presented which allows for a further alternative to the options set out in response to Main Issue 3 given that the proposed and alternative options are broadly similar with all looking to continue the current brownfield led approach.</p> <p>Taylor Wimpey / AWG have no particular issue with the principle of brownfield led approach, just not the ‘current’ one advanced by the Council. This is set out in more detail within their response to the Proposed Spatial Strategy part of the MIR.</p> <p>The Council should be aware and must accept that there is no doubt that recent and current rates of housing delivery within the City have fundamentally failed to delivery anything like the housing requirement set out in TAYplan. Although the proposed TAYplan 2 sets a lower annualised requirement, there is no realistic prospect of even the lower requirement being met. Indeed, it is the case that the Council, as required by Scottish</p>

	<p>Planning Policy, have not maintained a 5 year effective land supply for some time now.</p> <p>Something needs to change.</p> <p>Taylor Wimpey / AWG suggest that there is a fundamental requirement for non-effective land, whether it be brownfield or greenfield, to be removed from the Dundee City LDP 2. In its place additional effective land, which inevitably will require to be greenfield given the amount of non-effective brownfield land currently allocated within the Dundee LDP, will need to be identified for housing purposes. Given the very limited amount of greenfield land within the city boundary and that some of it is not well suited to future housing land allocations, it is worth considering the longer term growth of the city and its relationship with Angus.</p> <p>This is important not only to ensure that the emerging plan includes suitable and deliverable land allocations, but also that in doing so, the LDP does not undermine a more logical and appropriate allocation strategy that would help deliver the longer term sustainable growth of the city which may come through TAYplan 3.</p> <p>Bearing this in mind, there are limited directions within which the city could physically expand with land lying to the north at Baldovan and Pitempton Farms being considered the most suitable location for further strategic scaled growth of the city. The reasons underpinning this are articulated within a report prepared and submitted on behalf of Traylor Wimpey / AWG titled "Land at Pitempton and Baldovan Farms, North Dundee" in response to the initial LDP 2 Call for Sites and to the TAYplan 2 MIR.</p>
<p>26 – Persimmon Homes North Scotland</p>	<p>Persimmon Homes North Scotland Ltd are disappointed that the Council are not offering any opportunity for a further alternative to suggest a further alternative to the options set out in response to Main Issue 3 given that the proposed and alternative options are broadly similar with all looking to continue the current brownfield led approach.</p> <p>Persimmon Homes North Scotland Ltd have no particular issue with the principle of brownfield led approach, just not the 'current' one advanced by the Council within all of the options.</p> <p>The Council will be aware that recent and current rates of housing delivery within the City have fundamentally failed to delivery anything like the housing requirement set out in TAYplan. Although the proposed TAYplan 2 sets a lower annualised requirement, there is no realistic prospect of even the lower housing requirement being close to being met. Indeed, it is the case that the Council, as required by Scottish Planning Policy, have not maintained a 5 year effective land supply for some time now.</p> <p>It is Persimmon Homes North Scotland Ltd's position that there is a fundamental requirement for non-effective land, whether it be brownfield or greenfield, to be removed from the Dundee City LDP 2. In its place additional effective land, which inevitably will require to be greenfield given the amount of non-effective brownfield land currently allocated within the Dundee LDP, should be identified for housing purposes.</p> <p>Of the options articulated within the MIR, the preferred option which includes land releases to the east and west is most aligned to Persimmon Homes North Scotland's position; albeit with an adjustment to the current</p>

	brownfield land approach as set out above.
40 – Gladman Scotland	<p>Dundee cannot necessarily rely on large housing allocations, which may prove to be ineffective in the long term to combat the lack of new houses. In order to create integrated and connected communities and neighbourhoods within Dundee, greenfield land for smaller sites also needs to be released. The Council should seek to allocate a wide range of sites in terms of scale and location to ensure the housing land supply has greater flexibility and sites are genuinely effective.</p> <p>As stated within the MIR and also Policy 8 of the current LDP, there is a focus on balancing housing type and tenure across a range of greenfield locations. The most appropriate and effective way of achieving this is by allocating greenfield land adjacent to existing residential areas.</p> <p>From the current LDP, Policy 9: Design of New Housing, states that housing developments in Dundee should be of high quality and contribute to creating places that build on and enhance the distinct character and identity of different parts of the City. This will not necessarily be achieved by large standalone allocations, however smaller sites are more likely to build on and enhance the character and identity of different parts of the city.</p>
46 – Stewart Milne Homes (Emac Planning)	<p>It is considered that a balanced release of land will be required around the City, including to the east to provide certainty in planned growth. This location has proven market success for delivering development in the short, medium and long term with previous greenfield developments achieving strong completion rates of 36 units per annum per housebuilder.</p> <p>To date the current LDP strategy has only been meeting 1/3 of the housing requirement and there is a clear need to bring forward a variety of greenfield sites to ensure SDP targets are met. History has demonstrated, see below, that brownfield sites cannot be relied upon and they should therefore be considered as windfall with deliverable greenfield sites allocated to ensure timeous delivery of the requirement.</p> <p>As noted under our comments under Main Issue 1, the 2011 to 2015 HLAs demonstrated a significant slippage in the past delivery of Brownfield land within the City. A total of 1,277 homes anticipated for completion by 2015 on brownfield sites in the City have not actually commenced. These sites have now have now been rolled into the current 5-year effective housing land supply (HLS) and account for approximately 46% of the supply of brownfield sites. In addition, the housing completion rates since 2011 are well below the TAYplan (approved 2012) housing land requirement (HLR) of 610 units per annum, with 437 homes completed in 2011, 299 homes in 2012, 147 homes in 2013, 168 homes in April 2014 and 210 homes in 2015.</p> <p>In practice, the annual housing completion rates confirm that the anticipated programming of a substantial number of brownfield sites has been over optimistic. Paragraph 57 of Scottish Government Planning Advice Note 2/2010 on Affordable Housing and Housing Land Audits states that “...it is important that assumptions do not overestimate the likely completions, as the audited effective supply forms the basis for the calculation of the additional housing land requirement to be provided through the development plan.”</p> <p>In addition to providing an effective HLS, Policy 4: Homes of the Proposed TAYplan also requires that the mix of housing type, size and tenure is provided to meet the needs and aspirations of a range of different</p>

	<p>households throughout their lives. It is considered that this can only be realistically achieved by addressing the disproportionate balance of greenfield and brownfield land in the City. As previously stated in these submissions the Dundee Housing Land Audit, 2015 identifies that only 12.5% of the HLS is on greenfield land, but that the most significant supply of new homes will be delivered, that is, 87.5% from brownfield land.</p> <p>It is considered that the supply of proportionate split of 1:7 greenfield/ brownfield HLS will fail to deliver to deliver planning policy objectives to provide for a mix of housing type, size and tenure across the City. Many of the brownfield sites are located within the built up area and there are constraining high costs in the redevelopment of these sites compared with greenfield locations. From an analysis of the Housing Land Audits over the last 5 years, it is clear that there is significant slippage on the programming of many of the brownfield sites across the City, equating to approximately 1,277 homes, which were anticipated for completion by 2015 and which have not yet started.</p> <p>The allocation of additional greenfield land will assist in achieving flexibility and choice and redress/rebalance the spatial strategy for greenfield releases across the city which has been predominantly concentrated to the west of the City. Allocating new greenfield releases in the new LDP2 to the east allows for choice across the City with the Western Gateway now well under way.</p> <p>The Dundee HLA, 2015 identifies that from the date of adoption of the LDP2, that is 2018, the existing greenfield housing supply equates to only 446 units, all located to the west of the City. At the point of adoption the Plan will therefore have less than 1 years supply if further sites are not allocated. The HLA also indicates that there is no greenfield housing land supply currently available for the second period of LDP2, which is 2023-2028, with the Western Gateway completing in 2023.</p> <p>There is not only an emerging shortfall in the HLS, but also a decline in the greenfield HLS with no greenfield sites available at all in the second 5-year period of LDP2. In addition, there is a locational lack of choice in the location of the greenfield HLS in the first 5-year period of LDP2 with all such choice being essentially located to the west of the City. Therefore greenfield allocations and ‘future land’ allocations are required to provide certainty and flexibility in the Plan.</p>
66 – Elderly – Workshop Response	<ul style="list-style-type: none"> • No good social housing for young families. • Planning allows too many houses for the area with no amenities and open space. • Planning needs to look at style of housing to fit in to the area. • Lack of affordable homes. • Homes being built north of the A92 are in areas prone to flooding with no community facilities such as shops, GP, transport, schools etc. • Need more housing for everyone. • Regeneration of Beechwood – lots of ground that could be built for social housing.
69 – Youth Council – Workshop Response	<ul style="list-style-type: none"> • Not enough houses • Good number of large houses • Small houses or apartments would be nice • Need more affordable housing

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2. DCC Summary of Comments	3. DCC Initial Response	4. Further Consideration
<p>18 – Scottish Natural Heritage No individual site assessments were provided to comment on. There is a requirement for HRA screening of sites. Emphasise importance of landscape appraisals for the potentially large housing sites that could be allocated in the LDP.</p>	<p>Noted support for preferred option as most likely to meet the spatial strategy aims. DCC are preparing site assessment records for all sites that were submitted during Call for Sites and MIR to ensure a comprehensive early assessment of the environmental effects across a wider range of sites. DCC welcome comments on requirement for landscape assessments and support for green network approach.</p>	<p>Emphasise the importance of landscape and visual assessments for greenfield land release that is allocated in Proposed Plan. Maintain approach to engage with key agencies at an early stage ahead of the publication of the Proposed Plan, to ensure time to receive comments on individual site assessments and to allow for appropriate mitigation and enhancement measures to be identified and included on the allocated sites.</p>
<p>20 – Balmossie Developments, 62 – Kirkwood Homes and Linlathen Developments Support for additional greenfield release in East of City.</p>	<p>Noted support for release of greenfield land in east of City.</p> <p>These comments largely relate to the promotion of land located in east of City. A development site assessment record will be produced for every site that has been submitted to the Council to consider for allocating as housing land. The preferred option included considering a managed release of land in both the east and west of the City so each site will be considered against the housing spatial strategy that is progressed for LDP2.</p>	<p>Further consideration to be given to the housing strategy and to determine sites that will be allocated for housing in LDP2.</p>
<p>25 – Homes for Scotland, 29 – Barratt North Scotland, 32 – Manse LLP, 38 – Springfield Properties, 41 – Miller Homes Ltd, 45 – H&H Properties (North Grange), 47 – H&H Properties (Riverside Drive), 27 – Strategic Land Scotland Ltd, 44 – Mr J Thompson (Ristol), 62 – Kirkwood Homes and Linlathen Developments, 17 – Taylor Wimpey / AWG, 26 – Persimmon Homes North Scotland, 46 – Stewart Milne Homes (Emac Planning)</p> <p>Homes for Scotland and associated members as well as other developers have submitted representations across a range of issues</p>	<p>DCC are committed to preparing an effective and deliverable housing strategy within the Dundee LDP2. It is considered that the preferred option of prioritising brownfield redevelopment is inline with SPP 2014 and TAYplan.</p> <p>It is recognised that there are allocated brownfield sites that are less attractive to HfS members. DCC notes and agrees with Homes for Scotland’s statement in its ‘Building Enough Homes for Scotland’ manifesto that larger builders cannot deliver all the homes that Scotland needs on their own. It is for this</p>	<p>Further consideration is to be given to the housing strategy and DCC to determine sites that will be allocated in the LDP2.</p> <p>Table 1 Supply of Land to be revised in light of the recent publication of the draft Planning Delivery Advice Housing and Infrastructure guidance.</p> <p>A housing background paper will be prepared to show how the figures in Table 1 are calculated and justified.</p>

<p>relating to housing land supply. The submissions highlight the importance of allocating effective and deliverable housing land. Several suggestions have been made as to how this can be achieved these include; the release of additional greenfield land and the review of brownfield sites and to deallocate sites where non-effective. General points have included questioning how sites allocated in the second 5 year period of the plan will be prioritised as well as querying the current high proportion of brownfield land in comparison to greenfield sites. In addition the strategy of allocating housing sites that will not be built in the short term is also questioned.</p> <p>HfS and members have provided an alternative version of Table 1: Supply of Land for Housing on page 25 of the MIR and the numbers have been amended to reflect views of HfS members. This includes querying the 20% windfall figure and inclusion of the HST over a 12 year period and not 10 year period as well as changes to the HLA figure to reflect sites that HfS and members believe should be removed.</p>	<p>reason and in order to contribute to the housing land supply and regeneration priorities of the City that the current strategy allocates a large number of small brownfield sites.</p> <p>A range of sites on both greenfield and brownfield land has been submitted to the Council for consideration. These sites will be assessed and allocated if it is considered that they are effective and align with the housing strategy.</p> <p>DCC are committed to providing a range and size of housing sites and through the preferred option will look at allocating a managed approach to greenfield land release.</p> <p>Table 1 Supply of Land will be looked at to be consistent with the recent draft Planning Delivery Advice Housing and Infrastructure. The suggested revision from HfS is not supported as there are inaccuracies to HLR timescales and the Council maintain figure established in HLA.</p> <p>It is intended to prepare a housing background paper that will include a justification for 20% windfall figure including recent trends and likely future trends.</p>	
<p>28 – Hiddleston and Feist, 42 – SEPA, 53 – RSPB, 55 – Scottish Enterprise (Colliers), 61 – TACTRAN Support for preferred option</p>	<p>Noted support for preferred option.</p>	<p>Take forward support into LDP2.</p>
<p>30 – Scottish Enterprise (as key Agency), Support brownfield approach and further greenfield release to the West of the City.</p>	<p>Noted support for preferred option. Recognise that support for greenfield land release in west is site specific. A development site assessment record will be produced for every site that has been submitted to the Council to consider for allocating as housing land. The preferred option included considering a managed release of land in both the east and west of the City so each site will be considered against the housing</p>	<p>Further consideration to be given to the housing strategy and to determine sites that will be allocated for housing in LDP2.</p>

	spatial strategy that is progressed for LDP2.	
32 – Manse LLP, 41 – Miller Homes Ltd, 55 – Scottish Enterprise (as landowner) Welcomes figure of 20% generosity for HLR	Noted support for additional 20% added to HLR figure.	Noted.
38 – Springfield Properties, 02 - Inverarity Farms Ltd Support the preferred option of further greenfield land release in west and east of City. Request review of brownfield sites. Site specific support for the Western Gateway sites and adjacent land.	Noted support for preferred option. Recognise that support for greenfield land release in west is site specific. A development site assessment record will be produced for every site that has been submitted to the Council to consider for allocating as housing land. The preferred option included considering a managed release of land in both the east and west of the City so each site will be considered against the housing spatial strategy that is progressed for LDP2. It is recognised that there are allocated brownfield sites that are less attractive to larger developers due to the potential capacity. To smaller housebuilder/developers these sites remain attractive and contribute to both the effectiveness of the housing land supply as well as to the regeneration priorities of the City.	Further consideration to housing strategy and to determine sites that will be allocated in the LDP2. Continue to monitor effectiveness of housing sites.
47 – H&H Properties (Riverside Drive) Questions prioritising brownfield housing allocations and considers that existing approvals should be protected and that further release of brownfield site permissions would have detrimental impact on the delivery of these sites.	DCC consider that maintaining the strategy to prioritise brownfield sites is aligned with SPP 2014 as well as TAYplan SDP.	Provide further justification in preamble of the Proposed Plan to support brownfield housing strategy.
51 – Stewart Milne Homes (Ballumbie 1), 52 – Stewart Milne Homes (Ballumbie 2) Support for preferred option of housing land release in the east and west of the City.	Support for preferred option for greenfield housing release noted. The preferred approach states that the two greenfield sites allocated in the current LDP for 2020 will be brought into the greenfield allowance for the first 5 years of	Further consideration to housing strategy and to determine sites that will be allocated in the LDP2 and current phasing plan.

<p>Requests further limited greenfield land release in first 5 year period of the plan.</p>	<p>LDP2.</p>	
<p>53 – RSPB</p> <p>- Emphasises that all proposals to be subject to Habitats Regulations Appraisal.</p> <p>Encourages adapting, enhancing and managing brownfield sites (or part of them) as green infrastructure assets as alternatives to high density development.</p> <p>Requests cross referencing to green network map particularly for land at Western Gateway and Linlathen</p>	<p>DCC will prepare a Habitats Regulations Appraisal for the Proposed Plan and all proposals will be assessed.</p>	<p>Prepare HRA for Proposed Plan and continue to update and ensure LDP2 cross references to Green Infrastructure guidance and map</p>
<p>56 – Historic Environment Scotland</p> <p>Further clarity as to which sites are being considered under the preferred option in order for HES to determine if there will be an impact on the historic environment as result of allocating greenfield land in west and east of city.</p>	<p>A development site assessment record will be produced for every site that has been submitted to the Council to consider for allocating as housing land. HES will be presented with this document and will be able to analyse every site that is being allocated in the Proposed Plan.</p>	<p>Continue preparation of development sites assessment record in conjunction with publication of Proposed Plan. Provide key agencies with opportunity to comment ahead of publication to gather information.</p>
<p>09 - Broughty Ferry Community Council, 33 – Philip Duncan, 15 – Professor A R Grieve, 37 – Catherine Duncan</p> <p>Concern regarding infrastructure costs that may be required if further housing in east of City is allocated</p> <p>Existing road infrastructure, level of public transport and current school provision would not be able to cater for significant increase in housing number in east of city.</p>	<p>DCC intend to carry forward the Supplementary Guidance on Developer Contributions. The Guidance requires contributions for development of greenfield land in the City including land in the east. The guidance allows DCC to request contributions for infrastructure both on and off site.</p>	<p>Update Supplementary Guidance on Developer Contributions.</p>

<p>11 – Dundee Civic Trust</p> <p>- Questions the requirement to allocate greenfield land at Linlathen after the recent greenfield land that has been approved within Angus Council at Monifieth and that this meets the needs for new housing in the east.</p>	<p>DCC consider that release of greenfield land at the existing allocated site at Linlathen H70(2) to be in line with the housing spatial strategy that was progressed in LDP1. DCC consider that the City has been identified in TAYplan as a principal settlement and the City continues to be the focus for housing growth.</p>	<p>Further consideration to housing strategy and to determine sites that will be allocated in the LDP2 and current phasing plan.</p>
<p>34 – West Green Park Residents</p> <p>Further greenfield land release at Western Gateway is not supported, the focus should be on providing infrastructure and facilities to the area.</p>	<p>DCC note comment regarding infrastructure and facilities.</p> <p>The Council will consider sites that have been submitted within the west of the City as part of a managed release of greenfield land in the second 5 year period of the Plan.</p>	<p>Further consideration to housing strategy and any associated infrastructure requirements to determine sites that will be allocated in the LDP2 and current phasing plan.</p>
<p>50 – Stobswell Forum</p> <p>Brownfield sites should take priority over greenfield sites and there should be no further greenfield land release until further progress on brownfield sites within the City.</p> <p>- Maryfield tram housing allocation to be removed to reflect Transport Museum proposal</p>	<p>DCC consider that preferred option continues to prioritise the reuse of brownfield land however it is also important to allow for choice and flexibility in the housing market and to encourage a range of housing type and tenures to be built across the City.</p>	<p>Provide further justification of housing spatial strategy in preamble of Proposed Plan.</p> <p>Consider deallocating the current housing allocation at Maryfield tram depot in light of the recently approved residential use and other interest on remainder of site.</p>
<p>57 – Friends Of The Earth Tayside</p> <p>Given the continued intrusion into the greenfield margins of Dundee, we believe that there should be a Green Belt for Dundee including most of these margins along with neighbouring areas of adjacent local authorities</p>	<p>DCC intend to carry forward the existing Open Countryside policy that restricts wide scale housing development on greenfield sites other than those that have been identified in the Development Plan. This approach focuses new large scale development into allocated sites and is appropriate for the boundaries of the City.</p>	<p>Maintain Open Countryside policy</p>
<p>13 – Scottish Government</p> <p>Council to provide justification as to reasoning for providing 20% generosity.</p> <p>- Queries how much affordable housing will be required in LDP2 – HLR should be separated into market and affordable housing and justified</p>	<p>DCC will provide further justification for the 20% generosity figure as well as detailing approach to affordable housing in the City.</p> <p>DCC welcomed further advice and good practice that was provided in the Planning Delivery Advice Housing and Infrastructure document and will incorporate the advice where</p>	<p>Provide further justification for the 20% generosity figure in the Proposed Plan and consider the approach to be in line with the flexibility in Policy 4 of TAYplan SDP.</p> <p>Provide a paragraph detailing approach to land</p>

<p>- Encourages consideration of using a 'flexibility policy'</p> <p>- Encourages number for housing to be displayed as shown in Draft Housing and Infrastructure guidance</p> <p>Transport Scotland – have provided site specific comments</p>	<p>relevant to DCC into the Proposed Plan.</p> <p>DCC note comment on inclusion of flexibility policy and consider that allocating land for the second 5 year period of LDP2 allows for flexibility to be brought forward if required.</p> <p>Transport Scotland – have provided site specific comments which will be taken into consideration when allocating sites and finalising Development Sites Assessment records</p>	<p>for affordable housing in Proposed Plan</p> <p>Incorporate relevant tables and advice from recent draft Planning Delivery Advice: Housing and Infrastructure guidance into Proposed Plan.</p>
<p>40 – Gladman Scotland</p> <p>Encourages allocations of a mixture of sizes of sites across the city and not to rely on large housing allocations and to allocate greenfield sites near to existing residential areas</p>	<p>DCC note comment and consider that the preferred option of a managed approach to release of greenfield sites allows for a mixture of sizes of sites in different locations to offer flexibility and choice in housing market.</p>	<p>Further consideration to housing strategy and to determine sites that will be allocated in the LDP2 and current phasing plan.</p>
<p>46 – Stewart Milne Homes (Emac Planning)</p> <p>Questions where greenfield land release in the second 5 year period of the plan will be located</p> <p>- Encourages further greenfield land release and future land release to give flexibility and certainty to market</p>	<p>DCC will consider the sites that have been submitted and will determine sites that will be allocated in the LDP2 and there associated phasing. The preferred option was to allocate land in the east and west in second 5 year period of the plan to provide certainty over the future growth of the City.</p>	<p>Further consideration to housing strategy and to determine sites that will be allocated in the LDP2 and current phasing plan.</p>
<p>66 – Elderly (Workshop Response)</p> <p>Raise issues relating to the provision of affordable housing, the design of housing and the need for provision of community facilities, services and open space within new housing developments.</p>	<p>DCC will provide further justification detailing approach to affordable housing in the City.</p> <p>The policies within the Proposed Plan will seek to promote high quality, well designed housing with appropriate amenity and facilities within new development.</p>	<p>Provide a paragraph detailing approach to land for affordable housing in Proposed Plan</p>

<p>69 – Youth Council (Workshop Response)</p> <p>Raise issues relating to the provision of new housing, choice of size and affordability.</p>	<p>DCC will provide further justification detailing approach to affordable housing in the City.</p> <p>The policies within the Proposed Plan will seek to provide a wide range of housing sites to cater for various tenures and will encourage high quality residential development within the city.</p>	<p>Provide a paragraph detailing approach to land for affordable housing in Proposed Plan.</p>
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5. Suitability of Specific Sites – Refer to Development Sites Assessment for these housing sites	
02 - Inverarity Farms Ltd	Land to West of recently approved Dykes of Gray village
17 – Taylor Wimpey / AWG	Land at Pitempton and Baldovan Farms
20 – Balmossie Developments	Land west of existing Balmossie development
27 – Strategic Land Scotland Ltd	Land at South Auchray
28 – Hiddleston and Feist	Several units within Blackness Area
32 – Manse LLP	Land at Camperdown
38 – Springfield Properties	Land to East and West of approved Dykes of Gray village
41 – Miller Homes Ltd	Land at Pitkerro House
43 – Ristol Consulting Ltd	H72 Land to east of Strathyre Avenue
44 – Mr J Thompson (Ristol)	North Grange Farm
45 – H&H Properties (North Grange)	North Grange Farm
47 – H&H Properties (Riverside Drive)	MIR74 through call for sites, Riverside Drive flats
51 – Stewart Milne Homes (Ballumbie 1)	Ballumbie Village Phase 1
52 – Stewart Milne Homes (Ballumbie 2)	Ballumbie Village Phase 2
55 – Scottish Enterprise (Colliers)	Land at Balgarthno
62 – Kirkwood Homes and Linlathen Developments	Land at H71(2) and surrounding land to north and east

Main Issue / LDP1 Policy / Other Issue (reference & heading)	Main Issue 4 – Increasing Housing Density in the District Centres	
Officer:	RP	
Body or person(s) submitting a response (including unique reference number):		
09 – Broughty Ferry Community Council	28 – Hiddleston and Feist	52 – Stewart Milne Homes (Ballumbie 2)
11 – Dundee Civic Trust	29 – Barratt North Scotland	53 – RSPB
13 – Scottish Government	43 – Ristol Consulting Ltd	56 – Historic Environment Scotland
15 – Professor A R Grieve	44 – Mr J Thompson	57 – Friends Of The Earth Tayside
18 – Scottish Natural Heritage	50 – Stobswell Forum	58 – Rapleys
25 – Homes for Scotland	51 – Stewart Milne Homes (Ballumbie 1)	
26 – Persimmon Homes North Scotland Ltd		

1. Summary of the Comments to the MIR	
Support Preferred Option	
11 – Dundee Civic Trust	While the Trust supports this option, it is on the basis that the question of related residential parking is suitably addressed. The Trust is concerned that the issue of residential parking throughout the City has not yet been comprehensively considered, as suggested at the previous stage of the LDP review. This is considered to be an increasingly serious problem in most residential areas, where on street parking is at or exceeds saturation level, causing problems for access for service and emergency vehicles and for the amenity and environment. This is aggravated by an increasing trend for commercial vehicles to park adjacent to the owners' homes.
13 – Scottish Government	<p>The National Review of Town Centres External Advisory Group Report (the Town Centres Review) identified town centre living as one its themes. It highlights: <i>“Footfall is key to achieving thriving, successful town centres. The best footfall is the residential kind, for people who live in a town centre will not only use its shops and institutions but will care for its safety and security in the evenings and at night.”</i></p> <p>The Scottish Government’s Town Centre Action Plan includes Town Centre Living as a key strand which states the Scottish Government endorses the idea of encouraging more people to live in town centres. As set out in the Town Centre Toolkit <i>“More housing in town centres supports local businesses and makes town centres more</i></p>

	<p><i>vibrant.</i>” SPP sets out national policy direction that the planning system should consider opportunities for promoting residential use within town centres where this fits with local need and demand. And similarly through the Scottish Government’s Local Housing Strategy Guidance, we are seeking to encourage local authorities to fully consider the role that town centres can play as residential communities.</p> <p>We therefore welcome the attention that the Council has paid to town centre living and treating it as a main issue. It is clear that the Council is taking the drive for promoting town centre living opportunities seriously and looking at different options to maximise the potential for this and support thriving, district centres.</p> <p>The Scottish Government would support the Council with its preferred option, in terms of increasing density to support and increase footfall within the district centres.</p>
15 – Professor A R Grieve	When planning any housing developments, it is essential to put in place right from the start the necessary infrastructure of schools, health care facilities, shops etc.
28 – Hiddleston and Feist	No comment
50 – Stobswell Forum	<p>This strategy will offer the greatest opportunity for enhanced footfall and thus sustainability for the district centre. The Forum welcomes reference to increasing housing density in inner cities and supporting innovative approaches to redeveloping existing building stock to create new homes within district centres. These inner city sites are capable of development at higher densities. The built form could include flats with a greater number of rooms and substantial balconies. In townscape terms the inner city lends itself to higher flatted types of building. Indeed the taller building is typical of the scale and character of inner city urban forms. In addition, given the imminent location of the Dundee Museum of Transport the Forum seeks the inclusion of visitor accommodation within the sequential test for Albert Street / Maryfield area. It is noted that just over 50% of dwelling units are flats and rather more than 50% of units are 3 rooms or less. The Housing Action Area programme of the 70s and 80s compounded the issue of large numbers of small flats. Whilst sub-standard housing was upgraded it resulted exclusively with small flats in concentrated pockets within the inner city.</p> <p>This puts severe pressure on shared amenity space, refuse storage and kerbside parking. Attempts should be made, in partnership with owners and developers, to bring forward pilot schemes to secure integration of smaller flats to provide a range of dwelling size to accommodate families and creating lifetime communities.</p>
51 – Stewart Milne Homes (Ballumbie 1)	<p>Stewart Milne Homes considered the Preferred Option to be a sensible policy approach.</p> <p>However it is also noted that this approach would address a different market segment to that which requires sites to be identified for detached or semi-detached houses. The TAYplan-wide HNDA 2013 highlights that there is an existing high proportion of flatted units that comprise half of the housing stock within the city and that as a result there is a need to provide further choice to the market by increasing the availability of family housing (MIR Page 24).</p>

<p>52 – Stewart Milne Homes (Ballumbie 2)</p>	<p>Stewart Milne Homes considered the Preferred Option to be a sensible policy approach.</p> <p>However it is also noted that this approach would address a different market segment to that which requires sites to be identified for detached or semi-detached houses. The TAYplan-wide HNDA2013 highlights that there is an existing high proportion of flatted units that comprise half of the housing stock within the city and that as a result there is a need to provide further choice to the market by increasing the availability of family housing (MIR Page 24).</p>
<p>53 – RSPB</p>	<p>RSPB Scotland generally supports the preferred option as we agree with the conclusions of the Strategic Environmental report (page 37) that this is likely to have positive benefits for energy efficiency and heat networks. However, developing some sites in District Centres at lower densities may mean that more green infrastructure (including garden ground) can be accommodated within the development site, for the benefit of local communities and wildlife.</p> <p>RSPB Scotland notes that the SEA recorded negative impacts for air quality and a recent ruling by the Supreme Court stated that areas of Dundee breached the annual average European legal limit for nitrogen dioxide in 2015. Therefore measures to reduce air pollution should be considered as part of any proposals to increase housing density.</p> <p>Developers could be encouraged to include swift bricks in new buildings:</p>
<p>56 – Historic Environment Scotland</p>	<p>We are generally supportive of this policy and agree with the aspirations outlined for district centres. It will be important that consideration of proposals relating to this policy are also informed by the relevant historic environment policies.</p>
<p>57 – Friends Of The Earth Tayside</p>	<p>We agree that a flexible approach is appropriate to adapt to changing urban property requirements, lifestyles and domestic situations, so that District Centres remain busy and popular locations.</p>
<p>58 – Rapleys</p>	<p>We agree that the flexibility proposed via the Preferred Option is a sensible and pragmatic approach to address both housing need, and demand for the range and mix of housing in the City, particularly in districts close to the City Centre and that are well-served by public transport.</p> <p>With respect to types of housing provision, we make detailed comments in our written representation about the prospect of a more flexible policy approach to development and investment within the Blackness GEDA. Given the proximity of Blackness to the Universities of Abertay and Dundee, and College network, and the pressure for Private Rented Sector housing provision (as opposed to university leased accommodation itself) and the trend for higher education employees (not students) to commute from Fife (Tay Bridgehead) (taking Council tax and spend with them), then Dundee City Council should be applying the proposed flexibility to enable increased capacities in locations immediately adjacent to District Centres for the mixed housing needs.</p>
<p>Support Alternative Option 1</p>	<p></p>

NONE	NONE
Support Alternative Option 2	
09 – Broughty Ferry Community Council	<p>It is proposed to increase housing density in district centres in an attempt to increase footfall and increase demand for local services. On page 40 of the MIR there is a summary of the ‘health checks’ for the five district centres. It is seen that Broughty Ferry probably is the ‘healthiest’ district centre. It is well known that Broughty Ferry’s shops are popular with not only locals but people from other areas. This is probably partly a consequence of Broughty Ferry being an attractive resort. There are rarely any unoccupied shops or offices</p> <p>It is therefore considered that there should be no element of ‘town cramming’ introduced into Broughty Ferry’s shopping centre and associated environs. Already there is considerable development (often inappropriate) pressure put on Broughty Ferry’s centre. There are some possible vacant sites but these should be developed under existing standards given in Appendix 3, so that the possibility of adversely affecting the character of the centre is avoided. It is considered that suitable “material considerations” would provide sufficient flexibility if required.</p> <p>The words “innovative approach” in the MIR gives some cause for concern when we remember an attempt was made to build a multi-storey residential block in Brook Street a few years ago.</p> <p>It is suggested that a modified Alternative Option 2 be selectively applied to Broughty Ferry. Text to encourage higher density should only be applied for the weaker district centres.</p>
25 – Homes for Scotland	<p>Whilst in planning terms Homes for Scotland would agree that the increase of densities within city centres is to be welcomed, the Local Development Plan must be positive and flexible enough allow the market to be able to respond to each site accordingly depending on its location, characteristics and constraints. In principle, Homes for Scotland has no objection to Design Statements provided they are required on a proportionate basis and provided they form a consistent and objective basis for decision-making.</p> <p>Homes for Scotland have real concerns that the district centres are relatively small in size particularly the centres of Perth Road, Hillton and Albert Street. Consideration should be given to widening these centres so that more housing can be accommodated either within the centre or adjacent to them. It is of further concern expressed by our members that these centres vary quite significantly in terms of land values which would adversely affect the scale of development that would take place. By applying a uniformal standard across all these centres could result in inappropriate development taking place and therefore Homes for Scotland would urge the Council to be more flexible in their approach and to focus more on the overall design of a site.</p> <p>Homes for Scotland would also point out that one of the main issues that our members have is regarding the amenity/garden space especially in relation to smaller house types. It is not only housing associations who are unable to meet funding requirements and design requirements – private developers have similar issues when</p>

	<p>appraising sites if large gardens are required.</p> <p>Homes for Scotland would also point out that developers can find the design assessment process at times uncertain and cumbersome and onerous. They are being asked for increasing amounts of design work at pre-application stage, which is inappropriate for a stage designed to identify the key issues pertaining to a proposal and to identify areas for further work. We are of the firm opinion that design is clearly a matter for more detailed exploration at detailed application stage. If the Council wish to front load through the New Housing Standards then we must have assurances that the industry can expect their application be determined more quickly and not confronted with changes of opinion/advice by the planning authority, and therefore abortive work and costs.</p>
43 – Ristol Consulting Ltd	<p>Ristol Consulting Ltd support the use of Design Statements to facilitate high quality new development with a focus on place making.</p>
44 – Mr J Thompson	<p>Ristol Consulting Ltd support the use of Design Statements to facilitate high quality new development with a focus on place making.</p> <p>The accompanying report North Grange, Dundee – Custom Build Framework outlines a land use structure for the site, consistent with the MIR’s policy on the role of design statements.</p>
29 – Barratt North Scotland	<p>Barratt North Scotland has no specific comments on this issue but agree with the thoughts of Homes for Scotland.</p>
No Preferred Option	
18 – Scottish Natural Heritage	<p>This Issue appears to relate to design, use and redevelopment of buildings. These matters are outwith our area of expertise. However, we take this opportunity to highlight the role of green infrastructure in urban areas, particularly where these areas are to have their use intensified. As discussed in paragraph 4.14 of National Planning Framework 3 (NPF3), an integrated approach to greening the urban environment through maintaining existing or retrofitting well designed, meaningful green infrastructure can improve quality of life as well as increase climate change resilience. This should form part of the innovative approach to increasing density and we would be pleased to work with the Council to find ways to achieve this.</p>
26 – Persimmon Homes North Scotland Ltd	<p>Persimmon Homes North Scotland Ltd does not support the preferred option. The application of such a policy is potentially restrictive. In any event, there is a vagueness of which areas will be covered by such a policy given the reference to “within or immediately adjacent to”. Based on the accompanying plan the boundary of each defined District Centre is drawn very tightly and it is questioned whether there are any realistic opportunities for the type of development that may be covered by this policy.</p> <p>On a wider note, it is disappointing that there is no opportunity for a conversation through the MIR on the space standards as they apply throughout the city (Policy 9 and Appendix 3: Design of New Housing). The opportunity</p>

	<p>to address this and to consider a reduction in plot standards should have been included within the MIR.</p> <p>For example, the requirement (Suburban Standards) for an average of 140 sqm with a minimum of 120sqm for all new housing on brownfield land does not represent the most sustainable use of this land. Without any distinction between detached, semi-detached and terraced homes, for the latter, this standard leads to narrow and extremely long gardens quite often in locations where at best this is out of character and at worst compromises an otherwise acceptable development. The note in Appendix 3 that for terraced homes the standard may be relaxed is imprecise and does not provide sufficient certainty. It also is not clear how this affects the average which is required over the wider development proposal.</p> <p>Similarly, the requirement for an average of 160 sqm with a minimum of 120 sqm for all new housing on greenfield land also does not necessarily represent the most sustainable use of what is a relatively rare type of land in Dundee.</p> <p>Information on whether these standards are actually being achieved would assist this conversation.</p> <p>It is Persimmon Homes North Scotland Ltd's position that these standards be reviewed and reduced to a level consistent with other local authorities such as Fife where lower standards apply to greenfield and brownfield sites.</p>
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2. DCC Summary of Comments	3. DCC Initial Response	4. Further Consideration
11 – Dundee Civic Trust , support for preferred option on basis that residential parking would be suitably addressed and not impacted as a result of increasing density	Respondee concerns regarding potential impact of increasing density on parking provision noted.	Further consideration to inclusion of wording regarding increase or decrease on parking provision requirements subject to local circumstances.
13 – Scottish Government, 50 – Stobswell Forum, 15 – Professor A R Grieve, 57 – Friends Of The Earth Tayside, 58 – Rapleys, 56 – Historic Environment Scotland Respondee generally support preferred option	Noted and respondee comments are consistent with preamble to Main Issue 4.	This support for the preferred option will be taken forward into the Proposed LDP.
51 – Stewart Milne Homes (Ballumbie 1), 52 – Stewart Milne Homes (Ballumbie 2) , noted that the policy approach is a sensible option however it does not address the need for family housing as referenced from TAYplan HNDA 2013.	Noted support for option. Approach is to encourage the vitality of district centres and the policy approach would not rule out family housing within or close to these centres. MI3 addresses the options for release of sites across City and preferred option is for a range of sites to be allocated which will be suitable for a variety of house types including family	Wording of preamble to ensure that the flexibility of standards in these locations doesn't rule out family housing within or surrounding district centres but is to allow flexibility on a site by site basis to encourage footfall and the vitality of the existing centres.

	housing.	
53 – RSPB – support preferred option as likely to have positive benefits for energy efficiency and heat networks. However lower density development in District Centres may mean that more green infrastructure can be incorporated within the development site, for the benefit of local communities and wildlife.	Noted general support for preferred option. Green network guidance will be taken forward and will be material consideration when assessing planning applications	Ensure a clear link to green network guidance and encourage all sites to consider innovative design solutions
09 – Broughty Ferry Community Council – concern over increasing density within Broughty Ferry district centre as considered that current centre is successful with high footfall and that any development of sites should be under existing App 3 standards.	Concern is noted. The proposed design policy and existing conservation area policies would ensure that the scale and form of proposals were appropriate to the locality.	Consider wording of proposed policy and supporting text to emphasise the need to consider other LDP policies when preparing and assessing proposals.
25 – Homes for Scotland, 29 – Barratt North Scotland, 26 – Persimmon Homes North Scotland Ltd – concern that the district centres are small and the wording ‘immediately adjacent’ is unclear. Concern that applying same standard across all District Centres could result in inappropriate development – focus should be on design.	The App 3 standards are considered to be minimum quantitative standards only and high quality design will continue to be a key area of focus in the consideration of development proposals.	Further consideration to be given to wording of ‘immediately adjacent’.
43 – Ristol Consulting Ltd, 44 – Mr J Thompson – support the role of Design Statements to facilitate high quality new development with a focus on place making.	Noted. The intention of the preferred option is to create a policy framework to allow for increased residential development within district centres with a focus on high quality design. The Council welcome the submission of design statements that are submitted in support of applications.	Policy and preamble to refer to requirement for high quality design with focus on placemaking.
18 – Scottish Natural Heritage - This Issue appears to relate to design, use and redevelopment of buildings. These matters are outwith our area of expertise. However, we take this opportunity to highlight the role of green infrastructure in urban areas, particularly where these areas are to have their use intensified. This should form part of the innovative	Noted. Green infrastructure guidance will be regularly updated to assist in design considerations.	Take forward into LDP and align green infrastructure guidance to emerging preamble and policy.

<p>approach to increasing density and we would be pleased to work with the Council to find ways to achieve this.</p>		
<p>OTHER ISSUE</p> <p>25 – Homes for Scotland, 29 – Barratt North Scotland, 26 – Persimmon Homes North Scotland Ltd – issue with the current requirements of Appendix 3 in terms of amenity / garden ground size.</p>	<p>Appendix 3 standards to be considered separately</p>	<p>Appendix 3 standards to be considered separately</p>
<p>25 – Homes for Scotland raise concern regarding the front loading of the planning system and the burden this places on developers. Preference is for detailed design work to take place once an application is submitted.</p>	<p>The views of the industry body are noted. Front loading the planning system is a principle established in national and local planning policy and guidance. This approach increases certainty, improves the quality of development and increases the speed with which applications can be determined.</p>	<p>Undertake further engagement with Homes for Scotland.</p>

Main Issue / LDP1 Policy / Other Issue (reference & heading)	Main Issue 5 – Promoting Lifetime Communities – meeting the needs of older people	
Officer:	RP	
Body or person(s) submitting a response (including unique reference number):		
09 – Broughty Ferry Community Council 11 – Dundee Civic Trust 13 – Scottish Government 15 – Professor A R Grieve 17 – Taylor Wimpey / AWG 18 – Scottish Natural Heritage 25 – Homes for Scotland 26 – Persimmon Homes North Scotland Ltd	27 – Strategic Land Scotland Ltd 28 – Hiddleston and Feist 29 – Barratt North Scotland 34 – West Green Park Residents 38 – Springfield Properties Ltd 41 – Miller Homes Ltd 43 – Ristol Consultancy Ltd	44 – Mr J Thompson 46 – Stewart Milne Homes (Emac Planning) 50 – Stobswell Forum 51 – Stewart Milne Homes (Ballumbie 1) 52 – Stewart Milne Homes (Ballumbie 2) 65 – Dundee International Women’s Centre – Workshop response 66 – Elderly – Workshop Response

1. Summary of the Comments to the MIR	
Support Preferred Option	
09 – Broughty Ferry Community Council	No comment
11 – Dundee Civic Trust	This is most pertinent if national policy of encouraging older people to remain in their homes as long as possible is to succeed.
15 – Professor A R Grieve	No comment
28 – Hiddleston and Feist	No comment

34 – West Green Park Residents	It would be hoped that the proposed development at the Western Gateway would include provision for meeting the housing needs of elderly people. Such accommodation may be a consideration for allocating the NHS housing sites to the North East or North West of West Green Park.
50 – Stobswell Forum	The Housing Action Area programme of the 70s and 80s resulted exclusively with small flats in concentrated pockets within the inner city. This puts severe pressure on shared amenity space, refuse storage and kerbside parking. Whilst smaller flats might suit older people, upper flats are unsuitable. Attempts should be made, in partnership with owners and developers, to bring forward pilot schemes to secure integration of smaller flats to provide a range of dwelling size to accommodate families on upper floors with ground or lower floor accommodation for older folk thus creating lifetime communities.
Support Alternative Option 1	
NONE	NONE
Support Alternative Option 2	
17 – Taylor Wimpey / AWG	Taylor Wimpey / AWG agree most with Alternative Option 2 as the delivery of such housing is best done by the private sector in response to market demands. It is submitted that the most effective way of ensuring that a broad range of housing is delivered is to ensure that sufficient deliverable land of a wide variety, including greenfield land, is allocated for housing land uses.
25 – Homes for Scotland	Homes for Scotland whilst commending the Council in considering this important issue would disagree with the assertion in the preferred option that the market does not deliver adaptable homes. All of the provisions of the former Housing for Varying Needs Standards are now encompassed by the Building Regulations. All new homes are built with the ability to be easily adapted for older people and special needs. In requesting a Design and Access Statement embedded within Policy 9 to justify the approach to the provision of homes for elderly people would further create an unnecessary burden on house builders and as a consequence Homes for Scotland consider that ultimately it is for the market to decide through robust market analysis where housing is required. A range of tenure must be offered across the city that is able to respond and be adapted to meet changing housing choice for the elderly.
26 – Persimmon Homes North Scotland Ltd	Persimmon Homes North Scotland Ltd agrees with Alternative Option 2 as the delivery of such housing is best done by the private sector in response to market demands. It is submitted that the most effective way of ensuring that a broad range of housing is delivered is to ensure that sufficient deliverable land of a wide variety, including greenfield land, is allocated for housing land uses.
27 – Strategic Land Scotland Ltd	Strategic land (Scotland) Ltd / Iain Bett support Alternative Option 2. The delivery of such housing is best done by the private sector in response to market demands. It is submitted that the most effective way of ensuring that a broad range of housing is delivered is to ensure that sufficient deliverable land of a wide variety, including greenfield land, is allocated for housing land uses.

29 – Barratt North Scotland	<p>If the Council are insisting on this approach, it would be prudent to be prescriptive about the tenure required but this should be done in consultation with the elderly community to see if these people are likely to want to move out to outlying areas for example where public transport links aren't as good as the more central areas.</p> <p>Notwithstanding, there will be too much pressure put on delivery as a consequence to deliver product that may not be required in locations that the elderly may not want to live in. Also, are the Council expecting these specific houses to be tied up via s75 so that can only be occupied by the 'elderly'? Lastly, it should be borne in mind that all houses are designed as 'lifetime' homes in terms of the current Building Regulations. Hence why alternative option 2 is the most appropriate.</p>
38 – Springfield Properties Ltd	<p>Under building regulations all new homes are now built to be adaptable across a lifetime. The private market also delivers house of varying types and sizes to meet the market demand at that time. There are also specialised house builders who purpose build for older people.</p> <p>As the housing market develops over time it will naturally adjust to demand.</p>
41 – Miller Homes Ltd	MHL supports the housebuilding representative views conveyed by Homes for Scotland in respect of this Main Issue.
43 – Ristol Consultancy Ltd	Ristol Consulting Ltd support the approach to positively offering range and choice in new housing which includes accommodating the requirements of an elderly population.
44 – Mr J Thompson	<p>Ristol Consulting Ltd support the approach to positively offering range and choice in new housing which includes accommodating the requirements of an elderly population.</p> <p>The accompanying report North Grange, Dundee – Custom Build Framework outlines a land use structure for land at North Grange which consistent with the MIR's policy on the role of design guides could provide an element of housing for the retired sector.</p>
46 – Stewart Milne Homes (Emac Planning)	SMH object to the principle of Main Issue 5 as mainstream housebuilders should not be expected to meet the needs of a national ageing population. The independent market sector already provides commercial product to suit demand, e.g. McCarthy & Stone. Housing for varying needs already deals with adaptability of houses and it should not be included within the remit of planning policy. It is the remit of building standards, not planning, to administer the building regulations to secure the health, safety, welfare and convenience of persons in or about buildings.
51 – Stewart Milne Homes (Ballumbie 1)	In supporting Alternative Option 2, it is submitted that the council should concentrate on the release of land for development which the relevant market sectors will deliver in respond to need. It should not be the responsibility of the mainstream developers to provide accommodation suitable for an aging population, other than by building to the relevant requirements of Building Control Standards (which now incorporates the previous Housing for Varying Needs Standards).

52 – Stewart Milne Homes (Ballumbie 2)	In supporting Alternative Option 2, it is submitted that the council should concentrate on the release of land for development which the relevant market sectors will deliver in respond to need. It should not be the responsibility of the mainstream developers to provide accommodation suitable for an aging population, other than by building to the relevant requirements of Building Control Standards (which now incorporates the previous Housing for Varying Needs Standards).
No Preferred Option	
13 – Scottish Government	<p>We welcome the consideration given in Main Issue 5 of the Main Issues Report to meeting the housing needs of older people. It was not clear, however, what the additional “specific needs” referred to in this section covers. This should be clarified and addressed in the Proposed LDP.</p> <p>Paragraphs 132-134 of SPP provide information on such needs and this includes Gypsy/Travellers and Travelling Showpeople. If there is a need identified, SPP sets out how this should be addressed in development plans.</p>
18 – Scottish Natural Heritage	Types and configurations of housing are outwith our remit and we therefore have no detailed comments to make.
65 – Dundee International Women’s Centre	<ul style="list-style-type: none"> • Very difficult to get housing support especially for older BME community. Lack of English and education create vulnerability. • Housing (converted mill) not accessible for wheelchairs and prams.
66 – Elderly – Workshop Response	<ul style="list-style-type: none"> • Bus stop and bus service too far away from Sheltered Housing at Garry Place • Shops, post office, post box and community centre too far away from Sheltered Housing. • Need to travel outwith area for activities e.g. allotments. • No housing with care. • Lack of opportunity to down size within the area. • Older home owners reluctant to leave the area where they are known. • Some good housing but many older people left on their own. • Sheltered housing in Forthill but other areas could be better. • There needs to be housing care for the older population within the area as these people don’t want to leave their community. • Sheltered housing need to be divided between those with caring needs and those who require maintenance assistance. • Houses need ramps, should be on one level with community alarms and showers not baths. • Budgetary cuts mean older people are now more isolated and no new build. • Cuts to wardens is creating loneliness.

Support Preferred Option		
Dundee Civic Trust highlights the importance of delivering on MI5 if the national policy of encouraging older people to remain in their homes as long as possible is to succeed.	Noted and response comments are consistent with the preamble to Main Issue 5.	This support for the preferred option will be taken forward into the Proposed LDP.
West Green Park Residents wish to see the provision for meeting the housing needs of elderly people in the Western Gateway Development and that such accommodation may be a consideration in allocating the NHS housing sites to the North East or North West of West Green Park.	Site specific comments which provide support for the preferred option and which suggest a Greenfield/suburban location for elderly housing.	This support for the preferred option will be taken forward into the Proposed LDP. The site specific suggestion will be taken into consideration.
Stobswell Forum focuses on flatted developments within the inner city. Examples from the 70s and 80s produced concentrated pockets of small flats that had a detrimental impact on shared amenity space, refuse storage and kerbside parking. It is recommended that lifetime communities can be created through partnerships with owners and developers to produce flats with a range of dwelling sizes, upper level family accommodation and lower/ground level accommodation for the elderly.	Support for the provision of elderly housing which is expressed through design considerations. Recommendation for mixed tenure flats, with ground floor elderly accommodation and for these to be formed within existing flatted accommodation.	Design recommendations and innovative approach to be taken into consideration depending on the option choice.
Support Alternative Option 2		
Homes for Scotland, Miller Homes Ltd and Taylor Wimpey / AWG disagree with the assertion in the preferred option that the market does not deliver adaptable homes. All provisions of the former Housing for Varying Needs Standards are now encompassed by the Building Regulations. All new homes are built with the ability to be easily adapted for older people and special needs. Ultimately it is for the market to decide through robust market analysis where housing is required. A range of tenure must be offered across the city to respond and be adapted to meet changing	Comments are contrary to the preamble. In response, the current market demand often relies on the Lifetime homes model of the Scottish Building Standards to justify their position, however, not all elderly and aging people live in Lifetime homes and arguably the current market demand response does not always create Lifetime Communities. Various surveys appear to contradict the market demand e.g. YouGov survey by the Papworth Trust found that 47% of over 55s want to live in a bungalow when they retire.	Further evidence to be compiled to analyse the response assertions that the private sector is responding to market demands. Comments regarding Design and Access Statements to be taken into consideration depending on the option choice.

<p>housing choice for the elderly.</p> <p>Requesting a Design and Access Statement within Policy 9 would create an unnecessary burden on house builders.</p>	<p><i>“The government accepts that there is a shortage of housing specifically designed to meet the needs of disabled people and the ageing population. The IPPR Disability 2020 Report states that by 2020 only 12% of properties are likely to meet ‘visitability’ standards for disabled people.”</i> (Papworth website)</p> <p>It appears that the current mainstream housing response from the private sector is not meeting market demands. Mainstream housebuilders are considered to be meeting the demand for family housing and sheltered housing (i.e. McCarthy & Stone) but not providing new build housing of a form or in locations that would create lifetime communities. Design and Access Statements are required for national and major applications and for those in sensitive locations. They are also requested where there is a specific design or access issue that needs to be addressed and in line with Scottish Government advice they are a useful tool to help explain and justify a particular design approach. They should not be considered a burden but instead seen as an opportunity for the applicant to clearly set out the design rationale behind their development proposals and how the design responds to matters including meeting local housing needs.</p>	
<p>Homes for Scotland, Taylor Wimpey / AWG, Miller Homes Ltd, Homes for Scotland, Persimmon Homes North Scotland Ltd, Strategic Land Scotland Ltd, Springfield Properties Ltd and Stewart Milne Homes (Emac Planning). Delivery of housing for the elderly is best done by the private sector in response to market demands.</p>	<p>Comments are contrary to the preamble. In response, various surveys appear to contradict the market demand assertions of the responses, see response above.</p>	<p>Further evidence to be compiled to analyse the respondee assertions that the private sector is responding to market demands.</p>

<p>Homes for Scotland, Taylor Wimpey / AWG, Miller Homes Ltd, Homes for Scotland, Persimmon Homes North Scotland Ltd, Strategic Land Scotland Ltd, Springfield Properties Ltd, Barratt North Scotland and Stewart Milne Homes (Emac Planning). Under building regulations all new homes are now built to be adaptable across a lifetime.</p>	<p>Comments are contrary to the preamble. In response, not all elderly and aging people live in homes built to housing for varying needs standards or Lifetime homes. There also appears to be a market demand for single level homes, which is not being met by the current mainstream housing response from the private sector, see response above for comment D.</p> <p>Homes built to the current building regulations may be adapted over time, but this does not necessarily result in a lifestyle or living arrangement that older people desire. Neither are these homes located where there is good access to services and amenities that older people require such as public transport and healthcare facilities.</p>	<p>Further evidence to be compiled to support preferred option.</p>
<p>Barratt North Scotland. Elderly housing requirements could end up being located in areas that the elderly may not want to live. Are the Council expecting these specific houses to be controlled via Section 75 agreements so that they can only be occupied by the 'elderly'? Consultation with the elderly community should be carried out to inform the above.</p>	<p>Comments are contrary to the preamble. In response, whether private mainstream housing delivers two storey or single storey homes, under the model of Lifetime homes the elderly will be expected to live independently for as long as possible in all housing developments. Therefore the geographic argument could be applied to all housing developments.</p> <p>The feasibility of the preferred option is questioned with regard to controlling the sole use of housing units for the elderly.</p>	<p>Both issues raised to be considered against the option choice.</p>
<p>Stewart Milne Homes, Taylor Wimpey / AWG, Persimmon Homes North Scotland Ltd and Strategic Land Scotland Ltd. The council should ensure that sufficient deliverable land of a wide variety, including greenfield land, is allocated for housing land uses.</p>	<p>Considered under MI3. DCC still consider elderly housing provision to be a main issue.</p>	<p>Respondee comment to be considered under MI3.</p>
<p>Stewart Milne Homes (Emac Planning), Springfield Properties Ltd. The independent market sector already provides commercial product to suit demand, e.g. McCarthy & Stone.</p>	<p>Comments are contrary to the preamble. In response, the issue raised by respondee does not relate to demographic/market sector of MI5. McCarthy & Stone model provides privately managed properties with care options, while</p>	<p>Issue raised will not be considered against the option choice.</p>

	MI5 considers independently managed mainstream private homes for the elderly. DCC supports the McCarthy & Stone model where it is appropriate.	
Stewart Milne Homes (Emac Planning). It should not be the responsibility of the mainstream developers to provide accommodation suitable for an aging population.	Comments are contrary to the preamble. In response, DCC believe that the Local Authority, Housing Associations and mainstream private housing should all contribute to the challenge of appropriately housing the aging population.	Add further explanation into the proposed plan to justify requirement for mainstream private housing to contribute to housing the elderly.
Other Comments		
Scottish Government. It is not clear what the additional “specific needs” referred to in this section covers. This should be clarified and addressed in the Proposed LDP. Paragraphs 132-134 of SPP provide information on such needs, including Gypsy/Travellers and Travelling Showpeople. If there is a need identified, SPP sets out how this should be addressed in development plans.	Further clarification will be provided with regard to “specific needs” and the needs of Gypsy/Travellers and Travelling Showpeople will be addressed as a separate issue.	Add further explanation into the proposed plan to clarify “specific needs”.
Dundee International Women’s Centre. The issues raised related to more general concerns regarding access to suitable housing.	Comments reflect issues relating to housing for elderly and the challenge to provide suitable housing.	Will be addressed through the Preferred Option which will be taken forward in to the Proposed Plan.
Elderly workshop response. The main concerns raised with regards to housing was the need for housing for the elderly to be located within suitable locations with access to public transport, shops, services and amenities. It was felt that in some areas of the city there is good quality housing but in other areas of the city there was a need to provide opportunities to downsize or move in to sheltered housing within a community in which they already live. Some of the other issues raised are not planning matters and are related to the management and maintenance of housing.	Comments are in line with the issues highlighted through Main Issue 5 to provide “lifetime communities”. The comments emphasis the need to provide high quality new development in sustainable locations as well as the enhancement of existing communities providing a choice of housing for people of different needs. Matters that can not be dealt with through planning have been shared with Community Planning Partners to look at how this could be addressed through Local Community Plans or another more suitable channel.	Will be addressed through the Preferred Option which will be taken forward in to the Proposed Plan.

Main Issue / LDP1 Policy / Other Issue (reference & heading)	Main Issue 6 – Putting Our City Centre and District Centres First	
Officer:	SJ	
Body or person(s) submitting a response (including unique reference number):		
9 – Broughty Ferry Council	21 – Wallace Planning Limited Obo National Grid/Scotia Gas Networks	42 – Scottish Environment Protection Agency
11 – Dundee Civic Trust	24 – Real Find on behalf of Farmfoods Limited	49 – GVA James Barr on behalf of Aldi Stores Ltd.
12 – Theatres Trust	28 – Ian Hiddleston	50 – Stobswell Forum
13 – Scottish Government	30 – Scottish Enterprise (commenting as Key Agency)	56 – Historic Environment Scotland
15 – Professor A R Grieve	31 – Ares Management (Michael Halliday CBRE Ltd)	57 – Friends of the Earth Tayside
18 – Scottish Natural Heritage	33 – Philip Duncan	61 – Tactran
19 – (Muir Smith Evans) B.S Pension Fund Trustee Ltd		

1. Summary of the Comments to the MIR	
Support Preferred Option	
9-Broughty Ferry Council	Support but no comment.
11- Dundee Civic Trust	<p>It is noted that the Dundee Retail Study 2015 strongly recommends adhering to the current policies prioritising the City and District Centres. This is all the more important in the light of the higher than average levels of vacant properties there and the increasing competition from internet shopping.</p> <p>The Trust is sceptical of the Study's findings regarding the potential for significant additional retail floorspace in the city and would be concerned about the impact of an extension of the Overgate Centre on the viability of the Wellgate Centre. We do agree that if it is conclusively demonstrated that there is potential for more shopping floorspace in the city this should be directed to the city and district centres, and the extension of the Overgate Centre might then be considered as a longer term option.</p>
12 – Theatres Trust	Support but no comment.

13 – Scottish Government	<p>The Town Centre First Principle jointly developed by Scottish Government and COSLA encourages the public sector to continue to invest in town centres and help communities thrive. The principle is about adopting an approach to decisions that considers the vibrancy of town centres as a starting point. It asks that the health of town centres features in decision making processes.</p> <p>Paragraph 60 of SPP’s Policy Principles is that “the planning system should apply a town centre first policy when planning for uses which attract significant numbers of people, including retail and commercial leisure, offices, community and cultural facilities”. The SPP widens out the previous sequential approach for town centres first to apply it not just to retail and commercial leisure but also to offices, community and cultural facilities and uses which attract significant numbers of people.</p> <p>We support the Preferred Option to expand the sequential town centre first approach to the full set of uses set out in SPP.</p>
15 -Professor A R Grieve	Any further development of out-of-town shopping centres must be avoided as they have a most deleterious affect on town centres.
18- Scottish Natural Heritage	<p>Maintaining and enhancing the vitality and viability of the town and district centres is dependent on more than the uses in these places. As recognised in the Town Centre Toolkit, the overall place and how people move to and through it are key elements of vital and vibrant centres. For Dundee a key issue is strengthening both the physical and visual connectivity between the city centre and its waterfront, making it easier to access and creating a more attractive place to visit and move through. This issue relates to Main Issues 6 and 10 and, perhaps due to this overlap, these connections and opportunities are not clearly expressed in either. We recommend that the Proposed Plan should articulate a clearer vision and principles for the relationship between these key areas as the waterfront is a key resource for the City.</p>
19 – (Muir Smith Evans) B.S Pension Fund Trustee Ltd	Support but no comment.
24 – Real Find on behalf of Farmfoods Limited	<p>Accepting that consumer demands and retail formats have and will continue to change. One key aspect of shifting consumer demand is the desire to shop locally and more frequently. Large, destination superstores do not suit this need and there is now an increasing role for small-medium sized supermarkets throughout the city. The additional convenience floorspace capacity identified in the Dundee Retail Study 2015 could be addressed by the provision of such stores of between 250-1,000sqm (net sales area). Furthermore, the LDP should recognise that stores of this type cater for local catchments, which may not be served by the existing distribution of District Centres.</p>
28- Ian Hiddleston	Support but no comment.

<p>31 – Ares Management (Michael Halliday CBRE Ltd)</p>	<p>While the preferred option quoted is understood in terms of ethos and, is the preferable of the two options, we believe it requires further amendment.</p> <p>It should be made more explicit in terms of what is meant by the ‘sequential town centre first approach’. It should go onto quote, as outlined in paragraph 68 of SPP, that locations will be considered in the following order:</p> <ul style="list-style-type: none"> • town centres • edge of town centre • other commercial centres identified in the development plan • out of centre locations that are, or can be, made easily accessible by a choice of transport modes <p>Further to this it should be noted that flexibility and realism should be applied to the sequential approach (as noted within paragraph 69 of SPP) when understanding a site’s compliance.</p> <p>The preamble to Main Issue 6 denotes spare convenience and comparison expenditure within Dundee between the period of 2015-2026. It then provides no further commentary on the extent of the available expenditure and which sites within the city centre will meet this capacity.</p> <p>However, what it does seek to do, despite the lack of evidence, is to place a form of embargo on convenience and comparison expenditure being directed to Commercial Centres should the city or district centres be unable to service the demand in full.</p> <p>This approach gives rise to concern that it will create overtrading conditions or more concerning lost expenditure to destinations beyond Dundee entirely (eg. Fife/Aberdeen/Perth). This approach is not warranted particularly when the appropriate evidence base has not been presented to support it. It is also considered to be contrary to SPP in that it then fails to meet retail needs.</p> <p>A separate letter was also submitted the main comments are included below.</p> <p>Kingsway West Retail Park</p> <p>The retail park is viewed as an important asset to the City of Dundee and a key location in the city’s network of centres, complementing the services provided by the city centre and district centres alike.</p> <p>The park represents a logical and sustainable option in terms of a location that can assist in meeting an identified retail shortfall within the city. The demand for bulky goods provision within retail parks has reduced significantly, meaning that many of these centres are remodelling to avoid the possibility of becoming void or redundant.</p> <p>Market commentary</p> <p>There has been a noticeable shift away from traditional ‘bulky’ goods led tenant line up’s such as DIY, carpets</p>
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and electrical.

The number of traditional bulky operators on the market has declined markedly to the point that Kingsway has been unable to achieve full occupancy in recent times. This in turn adds to a sense of decline in the park in general. Vacancy means less customers, in turn less spend and that impacts the trading performance if existing tenants.

It should be stressed that our client views the park as operating in conjunction with, and in support of, the city centre, and the multitude of services available there.

Policy Shift

Ares acknowledge how successive versions of the development plan have always allowed for individual cases to be made for the sale of restricted goods ranges, however they now believe the city council should use the opportunity of the Development Plan Review to consider a shift in the current retail policy. This is an opportunity for the Council to address its policies to be more in keeping with, and adaptable to, the ever changing retail market, whilst also following the general provisions of Scottish Planning Policy.

A significant level of comparison retail capacity has been identified through the 2015 retail study prepared by Roderick MacLean Associates in association with Ryden. Accounting for commitments, the study shows the spare comparison capacity could rise to as much as £205 million by 2026. This, the study notes, equates to approximately 19,500 sq.m of floorspace available (if applying the high city centre turnover ratios). If the city centre turnover ratio was to be lower (which we believe to be the case) then the quoted floorspace level would be much higher.

It is clear that Dundee City Centre cannot by itself accommodate the significant level of retail capacity noted, however, in the study it draws a generic conclusion that the existing commercial centres should continue to be restricted to bulky goods only.

The study, together with the Main Issues Report, fails to outline how or where the spare retail capacity/ floorspace will be accommodated within the city/district centres alone and, in our opinion, fails to fully justify the continuation of the aforementioned restrictions.

On the basis of the retail study prepared for the emerging plan, and the lack of evidence provided to retain the current restrictions presented in the retail parks, our client strongly believes that there should be an opportunity to allocate and distribute the floorspace capacity across the city when it is clear that it cannot solely be accommodated within the confines of the city centre.

Future of Retail in Dundee

There is a healthy future for retail development in the City of Dundee. The retail study published in December 2015 provides a bland overview of the retail market.

	<p>With the constant increase in internet shopping meeting much of the bulky goods requirements, there needs to be a change in the retail policy approach to allow a degree of flexibility across the city and one which will help reverse the steady decline currently being witnessed at existing Dundee Retail Parks.</p>
33- Philip Duncan	<p>Support but no comment.</p>
42 - Scottish Environment Protection Agency	<p>In principle we support the town centre first approach and the preferred option of requiring significant footfall generating uses to consider locating within the City Centre and District Centres first. The sequential town centre first approach while not explicitly referred to with the MIR has obvious potential benefits of helping to reduce private car use and increasing public transport usage which in turn can have an overall positive environmental benefit i.e. climate change mitigation through reduction in greenhouse gas emissions and improve local air quality. Moreover this aligns and insures consistency with other existing policies and the proposed strategic and local spatial vision. We would however clearly highlight that while LDPs in accordance with SPP should seek to ensure that in terms of town centres being the first choice for high trip usage it is important that sustainable transport options are provided from the outset as an alternative to cars to attempt to achieve the overall vision of the plan. If integrated with sustainable transport options the town centre approach can as well as increasing footfall potentially help reduce the need to travel and help address public health issues arising from high levels of atmospheric pollution in urban centres thereby potentially assisting in addressing some of the air quality issues in the city as well as limiting our contribution to climate change. We note that mitigation for increased visitors to the City Centre in the Environmental Report page 41 and 43 proposes promotion of sustainable travel and infrastructure in the City Centre. We would expect that the proposed plan will contain such reference and outline specific opportunities to achieve this.</p> <p>Increasing private car use while increasing footfall may only lead to unintended consequence of increasing congestions and increased levels of roadside pollution. This in turn could exacerbate air quality and carbon emission issues and discourage the use of public transport. Therefore, increasing public transport access in parallel should be seen as a priority.</p> <p>Within the 'other comments section' of this consultation response we have provided some commentary regarding local air quality issues, this has obvious linkages with the drive towards a town centre first approach for retail and for promoting complimentary uses in the city.</p>
49 – GVA James Barr on behalf of Aldi Stores Ltd.	<p>Aldi support the Preferred Option, as set out within the MIR, which accords with national policy set out within SPP. This recognises the importance of town and district centres and encourages footfall generating uses to locate in such areas, if possible, prior to other less central locations being considered.</p> <p>Where possible, Aldi are always look to locate in town and district centre locations firstly, recognising the benefits such locations provide for local communities and generating linked trips. It must however be recognised that this is not always possible given the availability of sites and composition of these areas, typically being traditional high streets, with small units and limited opportunities for expansion. These locations can therefore struggle to accommodate the key aspects of the Aldi business model and are therefore not always suitable or viable. It is therefore important that flexibility is allowed for, as set out within SPP, to</p>

	<p>recognise the requirements of a modern retailer like Aldi. It is also notable that certain areas of the city do not benefit from having defined town or district centres and if Aldi is seeking to cater for such a catchment, this must be borne in mind when proposals are being assessed against the sequential test.</p> <p>A separate letter was also included the main comments are included below.</p> <p>Aldi have ambitious aspirations to further grow their presence in the City in the future, to meet the growing demand from customers for their offer.</p> <p>Aldi does not offer any internal specialist concessions or deli counters, this means that they focus solely on the grocery market and compete most actively with other food operators like the 'big 4' and not small independent shops. This means that the introduction of an Aldi store in an area often complements small local businesses, given that the foodstore does not compete for this style of service. Aldi are often complementary to the existing pattern of trade, with Aldi customers using these other facilities to supplement the Aldi foodstore.</p> <p>Aldi believe there is potential for the city to accommodate 6 stores, including new locations in the east (Broughty Ferry), north and city centre.</p> <p>Our client welcomes the ambitions for a strong shopping offer across the city and considers that Aldi has an important part to play in delivering this. Our client recognises that it is important for Dundee's shopping destinations to remain competitive with its peers and provide a high quality retailing offer, to meet the needs of the city's consumers.</p>
56 - Historic Environment Scotland	We welcome the Town Centre First approach outlined.
57 - Friends of the Earth Tayside	We believe the preferred option makes sense in terms of sustainable travel provision.
61- Tactran	Tactran strongly supports the Preferred Option as this will encourage developments in locations which can be accessed by a variety of travel modes and reduce dependence on the private car.
Support Alternative Option 1	
21- Wallace Planning Limited Obo National Grid/Scotia Gas Networks	The sequential approach is part of a well-established approach to retail policy. However (see the Dundee Retail Study 2015 Page 6, Paragraph 3.2.5) all: "parties are advised to be realistic and flexible in applying the sequential test."
30 – Scottish Enterprise	Whilst SE supports the over arching intentions for a town centres first approach to development generating high footfalls, it also considers that the LDP must provide a framework for development proposal which create confidence in the planning system and which create conditions for certainty for investors. SE considers that seeking to direct all 'high-footfall' Class 4 office uses to town centres as a first location, based on sequential testing, could result in uncertainty, and particularly lead to uncertainty with policies directing Class 4

	<p>employment to land allocated for employment purposes.</p> <p>SE requests that the Proposed Plan be constructed and worded in such a manner that it promotes town centres as the preferred location but that it also ensures that in considering development proposals, an appropriate balance will be met between the town centre and other employment-allocated sites. This will ensure that there is no uncertainty for investors and that no objectives or policies of the LDP will be undermined.</p>
50 – Stobswell Forum	<p>The Forum welcomes that objective of LDP2 which sees as vital, increasing footfall in district centres and attracting more people to live in and around these centres. In Stobswell a major increase in footfall will result from the proposed development of the former Maryfield tram depot as the Dundee Museum of Transport. Stobswell Forum, along with local traders and other groups, is intent on developing a vision for the area to capitalise on this development. It is ironic that whilst Government policy and the proposed LDP2 seek to enhance quality of life in district centres, in Albert Street / Forfar Road the Traffic Section of the Council want to retain this route as an alternative to the trunk road and to exclude this route (and others adjacent) from the 20'sPlenty initiative. The Forum would seek additionally to explore opportunities to expand the Albert Street District Centre area and the retail frontage in order to reduce the threat from out of centre retail developments.</p>

2. DCC Summary of Comments	3. DCC Initial Response	4. Further Consideration
<p>Dundee Civic Trust – Current policies are important especially with high levels of vacant properties and increasing competition from the internet. Sceptical about additional retail floorspace, concerned about the extension to the Overgate and the impact on the viability of the Wellgate. The extension to the Overgate should be longer term.</p>	<p>Support noted. In line with SPP it is proposed to adopt a refreshed sequential town centre first approach to assess proposals which generate significant footfall, including retail, commercial leisure uses, offices, community and cultural facilities and where appropriate other public buildings such as libraries and education and healthcare facilities. This approach would more fully meet the requirements of Scottish Government and the Strategic Development Plan. This will increase footfall and help maintain and develop the vitality and viability of the City Centre and District Centres and their role within the network of centres within Dundee and the wider TAYplan area.</p> <p>The proposed expansion of the Overgate centre represents the greatest opportunity to increase the retail offer in the City Centre and strengthen its role as a regional centre. This proposal is dependent on an upturn in the market and</p>	<p>Review and update the current sequential approach in line with SPP 2014.</p>

	demand from retailers.	
Scottish Government –The health of the town centre should feature in the decision making processes. SPP widens out the previous sequential approach to include offices, community and cultural facilities and uses which attract significant numbers of people.	Comment noted. In line with SPP it is proposed to adopt a refreshed sequential town centre first approached to assess proposals which generate significant footfall, including retail, commercial leisure uses, offices, community and cultural facilities and where appropriate other public buildings such as libraries and education and healthcare facilities. This approach would more fully meet the requirements of Scottish Government and the Strategic Development Plan. This will increase footfall and help maintain and develop the vitality and viability of the City Centre and District Centres and their role within the network of centres within Dundee and the wider TAYplan area.	Review and update the current sequential approach in line with SPP 2014.
Professor A R Grieve – Further out of town centre shopping centres must be avoided.	Comment noted. In line with SPP it is proposed to adopt a refreshed sequential town centre first approached to assess proposals which generate significant footfall, including retail, commercial leisure uses, offices, community and cultural facilities and where appropriate other public buildings such as libraries and education and healthcare facilities. This approach would more fully meet the requirements of Scottish Government and the Strategic Development Plan. This will increase footfall and help maintain and develop the vitality and viability of the City Centre and District Centres and their role within the network of centres within Dundee and the wider TAYplan area. Consequently, it is not intended to allocate additional out-of-town shopping centres.	Review and update the current sequential approach in line with SPP 2014.

<p>Scottish Natural Heritage – Need to strengthen the physical and visual connectivity between the City Centre and the Waterfront, easier to access and more attractive place to visit and move through. A clearer vision and principles for the relationship between these areas is a key resource for the City.</p>	<p>Comment noted. The Waterfront Masterplan recognises the importance of connectivity and as a result a new grid iron street pattern, green civic space and attractive boulevards will reconnect the city with the waterfront.</p> <p>It is the intention of the proposed Local Development Plan to carry this forward by encouraging linked trips between the City Centre and the Waterfront.</p>	<p>Consider connectivity between the City Centre and the Waterfront.</p>
<p>Real Find on behalf of Farmfoods Limited – Consumers now shop locally and more frequently. Small-medium sized supermarkets have an increasing role. Additional convenience floorspace (Dundee Retail Study 2015) could be addressed by the provision of stores between 250-1,000sqm (net sales area). The LDP should recognise these stores cater for local catchments which may not be served by the distribution of District Centres.</p>	<p>Comment noted. As recognised in the Dundee Retail Study 2015 trends in food shopping have changed. The convenience focus has turned to local convenience stores.</p> <p>It is recognised that it is not always possible to locate in the City and district centres that is why the existing Dundee Local Development Plan advocates a sequential approach and where it can be demonstrated that there is a need in terms of deficiency and in terms of distribution.</p>	<p>No further action required.</p>
<p>Ares Management (Michael Halliday CBRE Ltd) – It should be more explicit about the meaning of the term ‘sequential town centre first approach’. Should quote SPP paragraph 68 in terms of order. Flexibility and realism should be applied.</p> <p>The preamble to Main Issue 6 denotes spare convenience and comparison expenditure. No commentary is provided in relation to the spare convenience and comparison expenditure yet it seeks to form an embargo on convenience and comparison expenditure being directed to Commercial Centres. This approach could create overtrading conditions or lost expenditure to destinations beyond Dundee. This approach is not warranted when the evidence base has not been presented to support it. The number of traditional bulky operators on the market has declined markedly</p>	<p>Comments noted. The existing Local Development Plan clearly states the sequential order. It is proposed to review and update the current sequential order in line with SPP 2014. Reference is made to Para 68-69 of the SPP, it should be noted that the focus of these paragraphs is not solely retail and that the flexible and realistic approach suggested in SPP is to ensure that different uses are developed in the most appropriate locations. i.e. it might be more appropriate for certain office or industrial uses to be located in out of centre locations even if they are generators of significant footfall. It does not advocate a softer application of the sequential town centre first approach.</p> <p>It is the intention and strategy of the Local Development Plan in line with SPP to ensure that appropriate development takes place which</p>	<p>Review and update the current sequential approach in line with SPP 2014.</p> <p>Provide further justification in preamble to policy for the continued protection of the city and district centres.</p>

<p>to the point that Kingsway has been unable to achieve full occupancy in recent times. This in turn adds to a sense of decline in the park in general. Vacancy means less customers, in turn less spend and that impacts the trading performance if existing tenants.</p> <p>In a separate letter Ares states Kingsway West Retail Park represents a logical and sustainable option in terms of a location that can assist in meeting an identified retail shortfall within the City. Ares also note that the number of traditional bulky operators on the market has declined markedly to the point that Kingsway has been unable to achieve full occupancy in recent times.</p> <p>The park operates in conjunction with and in support of the City Centre.</p> <p>The Development Plan Review should be used to consider a shift in current retail policy.</p> <p>Dundee City Centre can not by itself accommodate the significant level of retail capacity noted in the Dundee Retail Study. The study and the Main Issues Report fail to outline how or where the spare retail capacity /floorspace will be accommodated and fails to justify the continuation of the restrictions. There should be an opportunity to allocate and distribute the floorspace capacity across the City.</p> <p>With the constant increase in internet shopping meeting much of the bulky goods requirements there needs to be a change in retail policy to allow a degree of flexibility and one which will reverse the steady decline at Dundee Retail Parks.</p>	<p>will maintain and enhance the vitality and viability of the City as such each planning application is judged on its individual merits to prevent overtrading and ensure there is choice for the consumer.</p> <p>It is not intended to allocate specific sites for further retail development other than those currently highlighted in the Local Development Plan. The strategy of the Local Development Plan will continue to encourage development in the recognised centres.</p> <p>Whilst the Retail Study forecasts spare convenience and comparison expenditure it emphasises the importance of supporting identified commitments and the existing network of centres in line with SPP. In addition, the City Centre has a high level of retail vacancies as such this furthers its priority for development.</p> <p>To ensure the vitality and viability of the established centres and in line with SPP, proposals for additional floorspace will be directed to the established centres in the first instance.</p> <p>A comment has been made regarding leakage, the Dundee Retail Study 2015 states that leakage to other centres outside Dundee is low at 5%. Whilst this figure is low it is important to ensure that it does not increase. Consequently, the strategy of encouraging development in the established centres will be continued.</p> <p>In relation to the comment regarding an evidence base to justify the continuation of goods range restrictions, the Scottish Government have advised that as the Council has undertaken a recent Retail Study which recommends applying restrictions on out of centre developments to maintain the strength and viability of the established centres, this</p>	
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	<p>provides an evidence base for the Preferred Option of maintaining the existing controls over the range of goods sold from the Retail Parks and foodstores.</p> <p>The Local Development Plan does allow for deviation from the town centre first approach where the three tests can be satisfied.</p> <p>In relation to the Kingsway West Retail Park being a logical location that can assist in meeting an identified retail shortfall within the City, Kingsway West is an identified commercial centre for the sale of bulky goods.</p> <p>In relation to the comment regarding full occupancy within Kingsway West Retail Park, it should be noted that Dundee City Council's own annual reports show that there has been only a single vacant unit out of the twenty at the time of survey in 2013, 2014 and 2015. It is encouraging that it is recognised Kingsway West Retail Park operates in conjunction with the City Centre.</p> <p>As stated previously, the strategy of the Local Development Plan will remain as it currently is with priority to the City Centre in the first instance.</p> <p>In response to the comment that the City Centre can not by itself accommodate the level of retail capacity noted in the Dundee Retail Study, in line with SPP and as stated previously with the high level of vacancies the City Centre will always be the first preference. However, there is a degree of flexibility where it can be demonstrated through satisfying a number of criteria.</p> <p>Whilst it is recognised that the internet will continue to have a growing impact on retail spending it is not intended to change the retail</p>	
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	<p>strategy of the Local Development Plan. Finally, as stated previously, Dundee City Council's own annual reports show that there has not been an increase in the number of vacant units within the Kingsway West Retail Park.</p>	
<p>Scottish Environment Protection Agency – This approach has potential benefits of reducing private car use and increasing public transport usage which have positive environmental benefit. Sustainable transport options should be provided as an alternative to cars. Increasing private car use while increasing footfall may lead to increasing congestion and increased levels of roadside pollution. This could exacerbate air quality and carbon emission issues and discourage the use of public transport. Links between local air quality issues and the drive towards a town centre first approach.</p>	<p>Comments Noted. The proposed plan will continue to ensure that new developments are accessible by alternative modes of transport and not just the private car.</p> <p>These points will be considered under other Main issues or Other Land Uses Planning Issues.</p>	<p>Ensure that new developments are accessible by alternative modes of transport and not just the private car.</p>
<p>GVA James Barr on behalf of Aldi Stores Ltd. – Aldi tries to locate in town and district centre locations. It is not always possible due to the availability of sites, composition of areas and size of units. Flexibility should be allowed as set out in Scottish Planning Policy to meet the requirements of a modern retailer. Certain areas of the City do not have a defined district centre this is important when assessing proposals against the sequential test.</p> <p>Aldi have aspirations to grow their presence in the City to meet growing demand from customers. Aldi focus solely on the grocery market. Aldi often complements small local business as their customers often use other facilities to supplement the Aldi foodstore.</p> <p>Aldi believe there is potential for the city to accommodate 6 stores in new locations. Aldi recognises it is important for Dundee to remain</p>	<p>Comments noted. It is recognised that it is not always possible to locate in the City and district centres due the availability of sites and size of units and that not all areas of the City are covered by a district centre that is why the existing Dundee Local Development Plan advocates a sequential approach. This approach also ensures that all sites are in readily accessible locations. This sequential approach will be reviewed and updated in line with Scottish Planning Policy (2014) and taken forward in the next Dundee Local Development Plan.</p> <p>Each planning application is judged on its individual merits in line with the sequential test.</p> <p>Reference is made to Para 68-69 of the SPP, it should be noted that the focus of these paragraphs is not solely retail and that the flexible and realistic approach suggested in</p>	<p>Review and update the current sequential approach in line with SPP 2014.</p>

<p>competitive to provide a high quality retailing offer.</p>	<p>SPP is to ensure that different uses are developed in the most appropriate locations. i.e. it might be more appropriate for certain office or industrial uses to be located in out of centre locations even if they are generators of significant footfall. It does not advocate a softer application of the sequential town centre first approach.</p> <p>Dundee City Council are willing to work with Aldi to develop new stores in appropriate locations where it can be demonstrated that there is a need in terms of deficiency and in terms of distribution.</p> <p>It is encouraging to note that Aldi recognises it is important for Dundee to remain competitive to provide a high quality retailing offer. It is the intention of the Local Development Plan to ensure that this is the case.</p>	
<p>Historic Environment Scotland, Friends of the Earth Tayside & Tactran - Support. Preferred option makes sense in terms of sustainable travel provision.</p>	<p>Support is welcomed. The proposed plan will continue to ensure that new developments are accessible by alternative modes of transport and not just the private car. These points will be considered under other Main issues or Other Land Uses Planning Issues.</p>	<p>Ensure that new developments are accessible by alternative modes of transport and not just the private car.</p>
<p>Wallace Planning Limited Obo National Grid/Scotia Gas Networks – All parties are advised to be realistic and flexible in applying the sequential test.</p>	<p>Comment noted.</p>	<p>No further action required.</p>
<p>Scottish Enterprise - LDP must create conditions for certainty for investors. Directing all 'high-footfall' Class 4 office uses to town centres could result in uncertainty. The Proposed Plan should promote town centres as the preferred location but also ensures an appropriate balance between the town centre and other employment-allocated sites for development.</p>	<p>Comments noted. SPP encourages a town centre first approach for all uses which generate significant footfall such as commercial leisure, community and cultural facilities not just retail or Class 4 office uses where appropriate. The SPP advocates there should be flexibility and realism applied to the sequential approach. i.e. it might be more appropriate for certain office or industrial uses to be located in out of centre locations even if they are generators of</p>	<p>Update the sequential approach in line with SPP 2014 and consider how to apply this in a flexible and realistic way as per para. 69 of SPP.</p>

	<p>significant footfall.</p> <p>The Local Development Plan strategy seeks to ensure that significant footfall generating uses are located in accessible and sustainable locations. The City Centre with its locational advantages is being pursued as the preferred location in the first instance in line with SPP. Some uses can be justified in locations outside town centres.</p> <p>The sequential approach in line with SPP will provide investors with certainty as there is a clear hierarchy to follow in terms of site location. In addition, the Local Development Plan allocates specific areas of the City for Economic Development purposes.</p>	
<p>Stobswell Forum - Stobswell Forum, local traders and other groups are developing a vision for the area to capitalise on the Transport Museum. Explore opportunities to expand the Albert Street District Centre and the retail frontage to reduce the threat from out of centre retail developments.</p>	<p>Comments noted. Albert Street District Centre has a mix of retail and non-retail uses which provide a solid local service with little evidence of decline. The Dundee Retail Survey 2015 states there are few obvious physical opportunities for expansion.</p>	<p>No further action required.</p>

Main Issue / LDP1 Policy / Other Issue (reference & heading)	Main Issue 7 – Uses within the District Centre Retail Frontages	
Officer:	SJ	
Body or person(s) submitting a response (including unique reference number):		
9 – Broughty Ferry Council	24 – Real Find on behalf of Farmfoods Limited	50 – Stobswell Forum
11 – Dundee Civic Trust	28 – Ian Hiddleston	56 - Historic Environment Scotland
13 – Scottish Government	33 – Philip Duncan	57 - Friends of the Earth Tayside
15 – Professor A R Grieve	49 – GVA James Barr on behalf of Aldi Stores Ltd.	66 – Elderly – Workshop Response
21 – Wallace Planning Limited Obo National Grid/Scotia Gas Networks		

1. Summary of the Comments to the MIR	
Support Preferred Option	
11- Dundee Civic Trust	The Trust supports this change aimed at reversing the growth of vacancies in the important retail frontages.
13 – Scottish Government	<p>SPP's approach is that planning for town centres should be flexible and proactive, enabling a wide range of uses which bring people into town centres, including town centre living. One of SPP's Policy Principles (paragraph 60) is that the planning system should encourage a mix of uses in town centres to support their vibrancy, vitality and viability throughout the day and into the evening.</p> <p>We support the Preferred Option to support a mix of uses within the district centres' frontages to support vibrancy, vitality and viability.</p>
21 Wallace Planning Limited Obo National Grid/Scotia Gas Networks	It is clear that many shopping frontages in the District Centres are out-dated (Victorian in nature) and unable to meet the requirements of shoppers or attract new investment.

24 – Real Find on behalf of Farmfoods Limited	A scaling down of retail frontages is badly required/long-overdue and conversions to other uses especially residential should be permitted.
28- Ian Hiddleston	Supports option but made no comment.
33- Philip Duncan	Supports option but made no comment.
49 – GVA James Barr on behalf of Aldi Stores Ltd.	Supports option but made no comment.
50 – Stobswell Forum	The Forum would seek additionally to explore opportunities to expand the Albert Street District Centre area and the retail frontage in order to reduce the threat from out of centre retail developments.
56 – Historic Environment Scotland	We are generally supportive of this policy and agree with the aspirations outlined for district centres. It will be important that considerations of proposals relating to this policy are also informed by the relevant historic environment policies.
57 – Friends of the Earth Tayside	The preferred option seems to be a sensible approach given the dynamics in the retail sector and the importance of reinvigorating the District Centres. Diversification of business activity can help to achieve this.
66 – Elderly Workshop Response	Lots of vacant shops on Lochee Road – New shop fronts would make a difference.
Support Alternative Option 1	
9 – Broughty Ferry Council	The preferred option would not be suitable for Broughty Ferry as it would risk creating 'dead frontages'. The preferred option may be appropriate with other district centres where there are persistently vacant retail premises.
15- Professor A R Grieve	Supports option but made no comment.

2. DCC Summary of Comments	3. DCC Initial Response	4. Further Consideration
<p>Dundee Civic Trust & Scottish Government – Supports the proposed change. Reference to SPP Para 60.</p>	<p>Support welcomed. In line with SPP it is proposed to adopt a refreshed sequential town centre first approach to assess proposals which generate significant footfall, including retail, commercial leisure uses, offices, community and cultural facilities and where appropriate other public buildings such as libraries and education and healthcare facilities. This approach would more fully meet the requirements of Scottish Government and the Strategic Development Plan. This approach would also help maintain and develop the vitality and viability of the District Centres and their role within the network of centres.</p>	<p>Review and update the current sequential approach in line with SPP 2014.</p>
<p>Wallace Planning Limited Obo National Grid/Scotia Gas Networks & Real Find on behalf of Farmfoods Limited - many of the shopfronts are out dated and unable to meet requirements. Conversions to other uses especially residential should be permitted.</p>	<p>Comments noted. In relation to dated shopfronts this will be considered in the more detailed matters on quality of place generally. In relation to meeting the requirements of modern retailers this will be addressed in other policies within the Retail section of the proposed plan. Where appropriate residential conversions will be supported.</p>	<p>Consider residential conversions where appropriate.</p>
<p>Stobswell Forum – Seeking to expand Albert Street District Centre.</p>	<p>Comment noted. Albert Street District Centre has a mix of retail and non-retail uses which provide a solid local service with little evidence of decline. The Dundee Retail Survey 2015 states there are few obvious physical opportunities for expansion.</p>	<p>Comment is noted.</p>
<p>Historic Environment Scotland & Friends of the Earth Tayside - supportive of policy. Important to consider historic environment policies when considering proposals.</p>	<p>Support welcomed and comment noted.</p>	<p>No further action required.</p>
<p>Broughty Ferry Community Council - Preferred option would create 'dead frontages.'</p>	<p>Comment noted. The Plan is trying to recognise that the role of district centres may have changed in some locations and examining the retail frontages allows for a more concentrated approach where this is required. It should be noted that each district centre will</p>	<p>Assess extent of retail frontages on an individual basis for each district centre.</p>

	have the extent of the retail frontages assessed individually and it would only be reduced according to the needs of the specific district centre.	
Elderly Workshop Response – seek to see new shop fronts to encourage occupation of vacant shops on Lochee Road.	Comment noted. The Plan is trying to recognise that the role of district centres may have changed in some locations and examining the retail frontages allows for a more concentrated approach where this is required. It should be noted that each district centre will have the extent of the retail frontages assessed individually and it would only be reduced according to the needs of the district centre.	Assess extent of retail frontages on an individual basis for each district centre.

Main Issue / LDP1 Policy / Other Issue (reference & heading)	Main Issue 8 – Major Out of Centre Retailing	
Officer:	SJ	
Body or person(s) submitting a response (including unique reference number):		
9 – Broughty Ferry Community Council	24 – Real Find on behalf of Farmfoods Limited	37- Catherine Duncan
11 – Dundee Civic Trust	28- Ian Hiddleston	39 – Environment
13 – Scottish Government	31 – Ares Management (Michael Halliday CBRE Ltd)	49 – GVA James Barr on behalf of Aldi Stores Ltd.
15 - Professor A R Grieve	35 – Graham and Sibbald on behalf of Mr M Mitchell	50 – Stobswell Forum
19 – (Muir Smith Evans) B.S Pension Fund Trustee Ltd	36 – Zander Planning Ltd on behalf of CWP Dundee Ltd	57 - Friends of the Earth Tayside
21- Wallace Planning Limited Obo National Grid/Scotia Gas Networks		61- Tactran

1. Summary of the Comments to the MIR	
Support Preferred Option	
9 – Broughty Ferry Community Council	Support option but made no comment.
11 – Dundee Civic Trust	It is noted that the preferred option includes the extension to Gallagher Park. We would suggest that this be abandoned or at least given a lower priority in favour of consolidating the city centre including the possible longer term option of an extension to the Overgate Centre.
13- Scottish Government	We support the Preferred Option, which supports the Town Centres First approach, rather than designating new out-of-centre retail locations.
15 - Professor A R Grieve	Any further development of out-of-town shopping centres must be avoided as they have a most deleterious affect on town centres

19 – (Muir Smith Evans) B.S Pension Fund Trustee Ltd

B.S. Pension Fund Trustee Ltd is the new owner of Gallagher Retail Park at East Dock Street, Dundee, having acquired the site in November 2014.

In acquiring the site, the Fund was aware of the retail park's unique policy status. This status was an important consideration in deciding to invest in the asset and in Dundee. The Fund would be concerned if any planning policy changes within the city were to undermine or compromise the basis on which the investment was made.

For some years now, Dundee City Council, as planning authority, has set out a very clear policy regime in relation to these three retail parks. Kingsway West and Kingsway East have been seen as commercial centres retailing a range of goods focussed on what is known as "bulky goods". Gallagher Retail Park, on the other hand, has been seen as being focussed on a range of goods more closely associated with city centre trading. The reasoning for this has been straight forward: Gallagher Retail Park is located adjacent to Dundee city centre and provides an ideal location for the sale of ranges of goods more closely associated with the city centre within floorplates which could not necessarily be provided within the city centre.

There is a significant policy history which supports this position.

As part of the background preparation for the review of the Local Development Plan and the publication of the Main Issues Report, the city council commissioned a fresh Retail Study. This was published in December 2015. In that Report, both the analysis (paras 6.10.1 – 6.10.4) and the stated implications and advice (paras 11.6.1 – 11.6.4) support the general continuation of the retail policies of the previous development plans and the resistance to any dilution of these policies.

It is therefore submitted that the policy planning framework which has been applied to commercial centres within Dundee within the last two development plans remains relevant and sensible and that the Preferred Option under Main Issue 8 of the Main Issues Report should therefore be carried forward into the forthcoming Proposed Plan.

Dundee is one of the few major city centres or town centres within Scotland which has the opportunity of providing retail park-type floorplates adjacent to the main centre. This means that retailers of goods which are focussed on city centres (including fashion clothing, mainstream clothing, and footwear) but which also require retail park-type units, can be located close to the city centre and do not need to go to out-of-centre retail parks.

If the city council, as planning authority, were to significantly amend this policy position this could undermine the current and future roles of Gallagher Retail Park in supporting the city centre retail offer. This could include the possibility that some of the existing retailers at Gallagher Retail Park would attempt to relocate to other commercial centres.

In summary, in supporting the MIR's Preferred Option for Main Issue 8, the following submissions are made:

(1) The policy planning framework which has been applied to commercial centres within Dundee, and is reaffirmed within the current MIR, remains relevant and sensible. Dundee is one of the few major city centres or town centres within Scotland which has the opportunity of providing retail park-type floorplates adjacent to

	<p>the main centre. This means that retailers of goods which are focussed on city centres (including fashion clothing, mainstream clothing, and footwear) but which also require retail park-type units, can be located close to the city centre and do not need to go to out-of-centre retail parks.</p> <p>(2) The city council, as planning authority, should maintain a policy position which does not undermine the current and future roles of Gallagher Retail Park in supporting the city centre retail offer.</p> <p>Finally, it is submitted that one amendment should be made to the Preferred Policy position at Main Issue 8, as follows:</p> <p>The potential extension of Gallagher Retail Park on the Bus Depot site should recognise the potential of that site for convenience goods as well as bulky household goods, subject to an appropriate retail assessment.</p>
<p>24 – Real Find on behalf of Farmfoods Limited</p>	<p>Without prejudice to compliance with Policy 24 requirements, there is a role for new, local shopping provision on a slightly larger scale than currently defined in Policy 26. This should be considered as a partial solution to address the Dundee Retail Study deficiency without detriment to the existing retail centres or reliance upon new major allocations. Such proposals would not exceed 1,000sqm (GIA).</p>
<p>28- Ian Hiddleston</p>	<p>Support option but made no comment.</p>
<p>37- Catherine Duncan</p>	<p>Support option but made no comment.</p>
<p>49 – GVA James Barr on behalf of Aldi Stores Ltd.</p>	<p>Our client supports, in part, the Preferred Option as set out under Main Issue 8, where no specific sites are identified for the additional convenience capacity that will be created during the lifetime of the new LDP. Aldi are still in the process of seeking to identify suitable sites in the areas of the city where they wish for a presence, looking first at the relevant town and district centres within each catchment for available opportunities. This option will therefore afford the ability to make a case for each location to meet these needs.</p> <p>We also note the comments on page 44 of the Main Issues Report in respect to main issue 8. This focuses largely on the findings of the Council’s retail study and outlines a number of the conclusions in respect to spare convenience floorspace capacity up to 2026.</p> <p>The MIR specifically states that “Taking planning commitments...into account it recommends that no further provision should be made for major foodstores up to 2026. Instead the spare convenience capacity can be accommodated by smaller convenience store operators...” Firstly, it is important to note that Aldi is not a major foodstore despite the MIR hinting that the recent grant of permission at Myrekirk Road was for this scale of development. Instead, the development at Myrekirk should be recognised as a modest (small/medium) scale operation, that is quite different to the big 4 chains. Indeed the Competition Commission into the grocery market in 2008, noted that these types of stores were a specific sector of the market, which offered consumers something materially different in terms of food shopping choice. Having consulted the Dundee Retail Study, at paragraph 8.4.1, the document states that the forecast capacity could support additional “small/medium and</p>

	<p>small stores as described in paragraph 8.3.1". This paragraph specifically notes that the Aldi offer would fall within the small/medium category of foodstore choice. The text of the MIR does not therefore fully reflect the position of the Council's own retail study in this regard. Indeed, the report actually acknowledges further potential for this type of store elsewhere in Dundee to meet consumer needs and we consider it important that this should be referenced accordingly within the Proposed Plan, when prepared. Please refer to the supporting letter for further details.</p>
50 – Stobswell Forum	Support option but made no comment.
57 - Friends of the Earth Tayside	We support the preferred option except we are not convinced that additional provision for bulky household goods is required.
61- Tactran	This will encourage developments in locations which can accessed by a variety of travel modes and reduce dependence on the private car.
Support Alternative Option 1	
21- Wallace Planning Limited Obo National Grid/Scotia Gas Networks	<p>The Gas Holder Site, Dock Street, Dundee should be allocated as follows for:</p> <p>"Some 11,150 sqm (120,000 sqft) Gross Class 1 Retail Floorspace with a medium-sized supermarket. Site to accommodate relocated Bus Depot; Gas Holder Removal and Remediation; Improved Access and Environmental Improvements. The City Council supports the redevelopment of The Gas Holder Site for a supermarket and non-food retailing. A Master Plan should be prepared by the site owners for approval by the City Council to establish the layout and development potential of the site."</p> <p>The earlier Colliers Retail Study recognises the development potential of TGHS. Paragraph 8.33 Page 94 states that: "In general retail planning policy terms we consider that The Gas Holder Site is the most suitable site currently not allocated for retail development in Dundee."</p> <p>Although dated, these conclusions still apply as TGHS remains the most suitable site currently not allocated for retail development in Dundee.</p> <p>As has been consistently argued by National Grid and Scotia Gas Networks for many years the Dundee Retail Study 2015 (DRS) now confirms the availability of significant spare convenience and comparison capacity over and above commitments in Dundee.</p> <p>Paragraph 18 states that the low and high forecast convenience expenditure capacities for 2015-26 equate to some 6,700 to 7,100 sqm net. Such an estimate which is considered to be on the low side would amply</p>

	<p>accommodate the establishment of a medium sized supermarket on THGS as well as elsewhere.</p> <p>Paragraph 21 similarly indicates very positive scope for additional comparison floorspace from 15,100 to 19,500 sqm net. Such an estimate which is considered to be on the low side would amply accommodate the establishment of 6,500sqm of non-food units on TGHS.</p> <p>Dock Street is located in the Inner East Sector of the City which is one of seven sectors defined in the Retail Booklet 2014. It includes the District Centres of Hilltown and Albert Street. Neither contains sites capable of accommodating the food and non-food requirements and with it the additional benefits that redevelopment of TGHS would bring. The proposed supermarket at TGHS would relieve the deficiency of provision in Inner East; complement the Central Area; strengthen the offer at the City Centre Retail Park; maintain a long-established retailing strategy endorsed in the former Dundee Local Plan and promote sustainable linked shopping trips to the City Centre Retail Park. A development site should be made available at Dock Street, Dundee that adds to the retail diversity of the City and accommodates new vibrant retailers to the City. Redevelopment of TGHS also removes an unattractive use from the edge of the City Centre and the redeveloped Waterfront. TGHS has the scale and adjacency to a successful retail park to attract the new retailers that a city the size of Dundee is expected to have.</p> <p>Retail warehouse provision in Dundee is poor when compared with other cities in Scotland. Only Kingsway West Retail Park offers the quality of space and environment to which retailers are attracted in competition with Scotland's leading centres. However this is peripherally located in relation to the City Centre and rebalancing to the City Centre/Waterfront Renaissance is necessary. Kingsway East Retail Park is poor in terms of layout and the quality of accommodation available is not attractive to quality retailers. Dundee lacks a Retail Park with an unrestricted open planning consent. Dock Street requires a foodstore/non-food retailing consent on The Gas Holder Site to: provide greater food choice within Dundee close to the City Centre and to the Waterfront Renaissance; to provide critical mass to support and complement the existing Retail Warehouse provision and to generate impetus for the success of the Gallagher City Centre Retail Park as a retail destination. The Gas Holder Site has the ability to offer a high quality retailing location which is well located to complement and enhance the offer of the City Centre and Dundee as a regional retailing centre. See Appendix 8: Kennedy and Co- Retailing In Dundee which is still broadly applicable.</p>
<p>31 – Ares Management (Michael Halliday CBRE Ltd)</p>	<p>We consider 'Alternative Option 1' to be the most appropriate. The Dundee Retail Study 2015 has identified both convenience and comparison capacity/deficiency within Dundee.</p> <p>Contrary to that noted within the 'Reason' for the 'Alternative Option 1' there is no justification as to why it could not fully deliver the aims of SPP. Not servicing identified deficiencies, via appropriate new floorspace provision (be that in or out of the city centre) would conversely fall short of meeting SPP principles.</p> <p>Focusing on comparison retailing the Dundee Retail Study 2015 (Table 9.5) shows that Dundee City Centre's 'Actual' Turnover stands at some £566 million in 2015 with the equivalent 'Average' Turnover standing at some £402 million. This then indicates a significant overtrading level of some £164 million.</p> <p>Forecast forward and, even accounting for commitments, the study then shows the spare comparison capacity</p>

could rise to as much as £205 million by 2026. This, it notes, equates to approximately 19,500 sq.m. (if applying the high city centre turnover ratios). If the city centre turnover ratio was to be lower (which we believe to be the case) then the quoted floorspace level would be much higher.

It is clear that Dundee City Centre cannot by itself accommodate the significant level of retail capacity noted, however, in the very same study it draws a generic conclusion that the existing commercial centres should continue to be restricted to bulky goods only. It, together with the MIR, fails to outline how or where the spare retail capacity/floorspace will be accommodated within the city/district centres alone and, in our opinion, then fails to fully justify the continuation of the aforementioned restrictions.

The preferred alternative option 1 can easily sit aside the current 'Policy 24: Location of New Retail Developments' which appears not to be referenced within the preamble to Main Issues 8 and 9.

Policy 24 provides the appropriate 'safety net' for the city/district centres as ultimately it seeks all new developments beyond the centres to demonstrate that they meet the: sequential test; will not prejudice or significantly impact on the identified centres; will assist in meeting deficiency and is accessible by a variety of transport modes.

It is vitally important that the appropriate balance is struck. While the town centre first approach is accepted it should not be to an extent, via the application of Policy 23, that it prohibits new retail provision that can ultimately assist to meeting identified retail deficiencies in the City.

The real danger being that it creates more harm than good, in that, due to the lack of appropriate provision within centres (and restriction on commercial centres beyond), it simply leads to both overtrading conditions and significant loss of expenditure from Dundee to other towns and cities nearby (eg. Fife/Aberdeen/Perth). It also goes against the accepted concept of trying to create appropriate competition and choice.

The Kingsway West Retail Park is an existing retail destination but one that has been in decline for some time. The new owners have identified an opportunity to stem that decline and improve the role of the centre in the City's network. It represents a logical and sustainable option in terms of a location that can assist in meeting the identified retail shortfall. The demand for simply bulky good provision within retail parks has long since departed meaning that many of these centres are becoming void or redundant.

It is important, from an urban regeneration and economic development point of view, to look to related but alternative options for the future of retail parks. The most straight forward way being to allow them to sell a greater range of goods that will then attract that much needed investment and at the same time assist in addressing the growing level of retail deficiency. This all would be predicated on the basis that the goods range proposed have been tested against Policy 24.

On other related matters we consider that the Figure 10 title requires changing to 'Identified Commercial Centres and Major Superstores' to avoid confusion. Commercial Centres are part of the network of centres, and are superior to Out Of Centre retail destinations when applying the sequential approach.

<p>35 – Graham and Sibbald on behalf of Mr M Mitchell</p>	<p>Requests that the land to the rear of the B&Q at King’s Cross Road, Dundee is specifically allocated for retail warehousing. The client is willing to accept the application of the goods range restriction policy to this site.</p> <p>The site is situated in an area of economic importance to the City located between a Commercial Centre and allocated economic development area. This location currently provides the same retail warehouse offer as the Commercial Centre and the Economic Development Area yet has no policy support to protect the important retailing destination of to support expansion in this location. This site represents an opportunity to expand on the retail warehouse offer in an established retail location. The site forms a natural extension to the existing retail warehousing. The allocation of this site for bulky retail development will complement the surrounding land uses and encourage linked trips to the existing shops at this location. It is requested that the Council offers policy support to this retail location.</p> <p>The size of the unit and restricted use will ensure that the allocation of this site for retail warehousing will not impact on the hierarchy of centres. The allocation of this site will provide Dundee with flexibility in terms of suitable retail warehouse locations and will also meet demand for an expanding household goods market.</p>
<p>36 – Zander Planning Ltd on behalf of CWP Dundee Ltd</p>	<p>We support the Alternative Option 1 as it relates to the land to the East of Myrekirk Road.</p> <p>This area has been the subject of planning applications for retail development. The ASDA was approved and is now built and operating (ref: 09/00427) and the land adjacent has been subject to a recent planning permission for an additional smaller foodstore (ref: 15/0404/FUL). These new developments combined create a significantly different land use that should be recognised in the Local Development Plan.</p> <p>These developments also create a residual site that sits between the two stores. This residual site is segregated from the main economic development area and now clearly relates to the retail developments. In land use terms it would be logical to allocate this land for retail or complimentary uses, such as food & drink and leisure.</p> <p>This can be justified as the Dundee Retail Study 2015 does identify future capacity for both convenience and comparison retail development over the life of the LDP. This residual area could support new retail floorspace, at a location already accepted for retail use, in line with the requirements set out in the Retail Study.</p> <p>In the context of the above, the whole site also has the potential to be considered as a Commercial Centre. This would acknowledge the retail developments already existing/approved and would provide a new site to accommodate any future requirements as set out in the Council’s retail study of 2015.</p>

2. DCC Summary of Comments	3. DCC Initial Response	4. Further Consideration
<p>Dundee Civic Trust – Extension to Gallagher Park should be abandoned or given lower priority in favour of consolidating the City Centre including the Overgate extension.</p>	<p>Comments noted. In line with SPP it is proposed to adopt a refreshed sequential town centre first approach to assess proposals which generate significant footfall, including retail, commercial leisure uses, offices, community and cultural facilities and where appropriate other public buildings such as libraries and education and healthcare facilities. This approach would more fully meet the requirements of Scottish Government and the Strategic Development Plan. This will increase footfall and help maintain and develop the vitality and viability of the City Centre and District Centres and their role within the network of centres within Dundee and the wider TAYplan area.</p> <p>The proposed expansion of the Overgate centre represents the greatest opportunity to increase the retail offer in the City Centre and strengthen its role as a regional centre. This proposal is dependent on an upturn in the market and demand from retailers. The proposed extension to the Gallagher Retail Park is to accommodate part of the City's future household goods retail floorspace requirements. To avoid undermining the retail strategy, the site will be subject to goods range restrictions to ensure it operates as a focus for retail warehousing trading primarily in bulky household goods. It will be complementary to the proposed expansion of the Overgate rather than competing with it.</p>	<p>Review and update the current sequential approach in line with SPP 2014.</p> <p>Consider the extension at Gallagher Retail Park.</p>
<p>Scottish Government – Support.</p>	<p>Support welcomed.</p>	<p>No further action required.</p>
<p>Professor A R Grieve – Avoid any more out-of-centre shopping centres.</p>	<p>Comment noted. In line with SPP it is proposed to adopt a refreshed sequential town centre first approach to assess proposals which generate significant footfall, including retail, commercial leisure uses, offices, community and cultural facilities and where appropriate other public buildings such as libraries and education and</p>	<p>Review and update the current sequential approach in line with SPP 2014.</p>

	healthcare facilities. This approach would more fully meet the requirements of Scottish Government and the Strategic Development Plan. This will increase footfall and help maintain and develop the vitality and viability of the City Centre and District Centres and their role within the network of centres within Dundee and the wider TAYplan area. Consequently, it is not intended to allocate additional out-of-town shopping centres.	
(Muir Smith Evans) B.S Pension Fund Trustee Ltd - The policy planning framework which has been applied to commercial centres within Dundee within the last two development plans remains relevant and sensible. The Preferred Option should be carried forward with an amendment that the potential extension of Gallagher Retail Park on the Bus Depot site should recognise the potential of that site for convenience goods as well as bulky household goods, subject to an appropriate retail assessment.	Comment noted. It is intended to maintain the existing allocation for the Gallagher Park extension. In order to avoid undermining the retail strategy, the site will be subject to goods range restrictions to ensure that it operates as a focus for retail warehousing trading primarily in bulky household goods. It is not intended to allocate any additional sites for convenience goods.	Further consideration to the extension at Gallagher Retail Park.
Real Find on behalf of Farmfoods Limited - there is a role for new, local shopping provision on a slightly larger scale than currently defined in Policy 26. This should be considered as a partial solution to address the Dundee Retail Study deficiency without detriment to the existing retail centres or reliance upon new major allocations. Such proposals would not exceed 1,000sqm (GIA).	Comment noted. Within Dundee the important role of local shops in supporting local neighbourhoods and making communities more sustainable and creating lifelong communities is recognised. The aim of the retail strategy is to protect District Centres whilst allowing new local shops in areas of low provision. There is a need to control the scale of development In order to ensure that it is genuinely local in nature and is not of such a scale to impact on the vitality and viability of existing shopping centres. The existing approach in the Dundee Local Development Plan advocates a sequential approach and where it can be demonstrated that there is a need in terms of deficiency and in terms of distribution. This approach ensures that new retail development is directed to where it is needed and that there is consideration of the impact of new retail	Review and update the current sequential approach in line with SPP 2014.

	development on the vibrancy, vitality and viability of the City and district centres.	
GVA James Barr on behalf of Aldi Stores Ltd. - the Dundee Retail Study, at paragraph 8.4.1, states that the forecast capacity could support additional “small/medium stores”. Aldi would fall within the small/medium category. The text of the MIR does not fully reflect the position of the Council’s own retail study in this regard. The report acknowledges further potential for this type of store elsewhere in Dundee to meet consumer needs. This should be referenced accordingly within the Proposed Plan.	Comment noted. It is considered that the policy approach currently adopted in the Local Development Plan allows the development of small/medium stores through the sequential approach and also where it can be demonstrated that there is a need in terms of deficiency and in terms of distribution. This approach ensures that new retail development is directed to where it is needed and that there is consideration of the impact of new retail development on the vibrancy, vitality and viability of the city and district centres.	Review and update the current sequential approach in line with SPP 2014.
Friends of the Earth Tayside & Tactran – Preferred option. Not convinced that additional provision for bulky household goods is required. Approach will encourage developments in locations which can be accessed by a variety of travel modes and reduce dependence on the private car.	Support welcomed. Comments noted. The strategy of the existing LDP focuses on improving active travel. The proposed Local Development Plan will continue with this approach to ensure that new developments are accessible by alternative modes of transport and not just the private car. The issues raised under this Main Issue in terms of active travel and green networks will be considered under the Enhancing the Natural and Built Environment section.	Ensure that new developments are accessible by alternative modes of transport and not just the private car.
Wallace Planning Limited Obo National Grid/Scotia Gas Networks - The Gas Holder Site, Dock Street, should be allocated for: 11,150 sqm (120,000 sqft) Gross Class 1 Retail Floorspace with a medium-sized supermarket. The Gas Holder Site has the ability to offer a high quality retailing location which is well located to complement and enhance the offer of the City Centre and Dundee as a regional retailing centre.	Comment noted. The retail strategy sequentially directs new major retail development to the City Centre, District Centres and Commercial Centres. Given the limited scope for growth in retail expenditure, careful consideration will need to be given to any new sites outwith the City Centre or retail hierarchy over the plan period. Whilst the Gas Holder site could physically accommodate a large scale of retail development there needs to be further and careful consideration of the impact this would have on the City Centre, District Centres and Commercial Centres.	Further consideration to the future allocation of the Gas Holder site.

	<p>The Gas Holder site is located in close proximity to the Port and is a large flat site which has seen no development over the plan period. The need for redevelopment of that site is acknowledged and there may be an opportunity for this as part of the future renewables sector and future decommissioning requirements. It is considered that an employment use should not be ruled out at this time.</p>	
<p>Ares Management (Michael Halliday CBRE Ltd) - The Dundee Retail Study 2015 has identified both convenience and comparison capacity/deficiency within Dundee.</p> <p>There is no justification as to why the Alternative Option could not fully deliver the aims of SPP. Not servicing identified deficiencies via appropriate new floorspace provision would fall short of meeting SPP principles.</p> <p>Focusing on comparison retailing the Dundee Retail Study 2015 shows that Dundee City centre's turnover indicates a significant overtrading.</p> <p>Forecast forward and even accounting for commitments, the study shows the spare comparison capacity could rise to approximately 19,500sq.m. If the city centre turnover ratio was to be lower then the quoted floorspace level would be much higher.</p> <p>Dundee City Centre cannot by itself accommodate the significant level of retail capacity noted. However, in the same study it draws the generic conclusion that the existing commercial centres should continue to be restricted to bulky goods only. It and the MIR, fails to outline how or where the spare retail capacity/floorspace will be accommodated</p>	<p>Comments noted. Whilst the Retail Study forecasts spare convenience and comparison expenditure it emphasises the importance of supporting identified commitments and the existing network of centres. In addition the City Centre has a high level of vacancies, as such the capacity exists to accommodate spare retail capacity in line with SPP and this furthers its priority for development.</p> <p>The alternative option would not fully deliver the aims of SPP as this option is about out of centre locations first rather than City Centre or district centres.</p> <p>In terms of spare retail capacity the existing Local Development Plan identifies the Overgate Centre and Wellgate Centre as those locations which will be supported as capable of accommodating a major element of new shopping floorspace in the City Centre. These locations will continue to be allocated. It is not intended to identify any other sites.</p> <p>Where the City Centre cannot accommodate development, proposals would be assessed against Policy 24 to ensure development takes place in appropriate locations. Policy 24 is an important policy to ensure that retail developments take place within identified</p>	<p>Review and update the current sequential approach in line with SPP 2014.</p>

<p>within the city/district centres. It fails to fully justify the continuation of the goods range restrictions.</p> <p>The preferred alternative option 1 can easily sit aside the current Policy 24 Location of New Retail Developments which appears to be referenced within the preamble to Main Issues 8 and 9.</p> <p>Policy 24 provides the 'safety net' for the city/district centres as it seeks all new developments beyond the centres to demonstrate that they meet the sequential test; not significantly impact on identified centres; assist in meeting deficiency; and is accessible by a variety of transport modes.</p> <p>Important that the appropriate balance is struck. The town first approach should not be via the application of Policy 23, that is prohibits new retail provision that can assist in meeting identified retail deficiencies in the City.</p> <p>Due to the lack of appropriate provision within centres, it leads to both overtrading conditions and significant loss of expenditure from Dundee to other towns and cities. Goes against the concept of trying to create appropriate competition and choice.</p> <p>The Kingsway West Retail Park is in decline. An opportunity to stem decline and improve the role of the centre in the City's network has been identified. The demand for bulky good provision within retail parks has long since departed. Many of these centres are becoming redundant.</p> <p>From an urban regeneration and economic development point of view, related but alternative options should be considered. They should be allowed to sell a greater range of goods that will attract investment and assist in</p>	<p>centres wherever possible and it protects and enhances the vitality and viability of those centres. It does allow for deviation from the town centre first approach where the three tests can be satisfied. It is intended to maintain this policy and to review and update the current sequential approach in line with SPP2014. The reason for the goods range restrictions approach is to ensure that a balance is maintained between safeguarding the City Centre in its role as a regional shopping destination and providing for bulkier retail warehouse goods in out of centre locations. These restrictions have been maintained consistently. It is considered that a relaxation of controls over the range of goods could result in existing retailers located within the City Centre relocating to the Commercial Centres. This would undermine the vitality and viability of the City Centre and its role as a regional shopping centre. The Council has applied the goods range restrictions in a flexible way, and has been prepared to support minor adjustments where that could benefit consumers without undermining the existing primary shopping centres. The restrictions are an important safeguard to avoid damaging the vitality and viability of existing shopping centres, and should be retained to clearly define the roles of the commercial centres.</p> <p>It is the intention of the Local Development Plan to ensure the appropriate balance is struck in terms of the allocation of retail development and restricting the range of goods sold. This is why the goods range restrictions apply predominantly to the Commercial Centres and major food stores. In line with SPP the Local Development Plan seeks to encourage development in the appropriate location to prevent overtrading and ensure there is choice for the consumer. Evidence from the Dundee Retail Study 2015 indicates that few shoppers</p>	
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<p>addressing the growing level of retail deficiency. This would be predicated on the basis that the goods range have been tested against Policy 24.</p> <p>Figure 10 title requires changing to 'Identified Commercial Centres and Major Superstores' to avoid confusion.</p>	<p>from the Dundee catchment shop elsewhere. 95% of comparison shopping by Dundee residents is made in Dundee with only 5% leakage to other destinations. Some 72% of comparison shopping by Angus residents is made in Dundee.</p> <p>In relation to the comment regarding full occupancy within Kingsway West Retail Park, it should be noted that Dundee City Council's own annual reports show that there has been only a single vacant unit out of the twenty at the time of survey in 2013, 2014 and 2015.</p> <p>The Local Development Plan allows for a qualitative and quantitative deficiency argument to be established to support investment outwith the City Centre subject to not undermining the established centres in line with SPP. SPP (para.68) requires development plans to adopt a sequential town centre first approach.</p> <p>In relation to the title for Figure 10, this suggested change is agreeable and will be considered should this figure be incorporated into the Local Development Plan.</p>	
<p>Graham and Sibbald on behalf of Mr M Mitchell - Figure 10 title requires changing to 'Identified Commercial Centres and Major Superstores' to avoid confusion. Commercial Centres are part of the network of centres, and are superior to Out Of Centre retail destinations when applying the sequential approach. Additional land should be allocated for bulky goods retail warehousing.</p>	<p>Comments noted. In relation to the title for Figure 10, this suggested change is agreeable and will be considered should this figure be incorporated into the Local Development Plan.</p> <p>The sequential approach is in line with SPP 2014 where town centres are considered first, then edge of town centre, then other commercial centres and then out-of-centre locations that are accessible by a choice of transport modes.</p> <p>The Dundee Retail Study 2015 has not identified the need to allocate additional land for bulky goods retail warehousing other than the existing proposed extension at Gallagher Retail</p>	<p>Consider amending title for Figure 10 in MIR and related Figure in Proposed Plan.</p>

	Park.	
Zander Planning Ltd on behalf of CWP Dundee Ltd - We support the Alternative Option 1 as it relates to the land to the East of Myrekirk Road. These developments (Asda & Aldi) create a residual site between the two stores. This residual site is segregated from the main economic development area and now relates to the retail developments. It would be logical to allocate this land for retail or complementary uses, such as food & drink and leisure. The whole site also has the potential to be considered as a Commercial Centre. This would acknowledge the retail developments already existing/approved and would provide a new site to accommodate any future requirements as set out in the Councils retail study of 2015.	Comments noted. The Dundee Retail Study 2015 states that the potential to support additional convenience floorspace requires to be directed to opportunities within the network of centres and the associated policy restrictions on out of centre developments. It is not proposed to identify this site for retail development or food and drink and leisure. In line with SPP, a wide range of uses which attract significant numbers of people should be located in the town centre. The site will not be allocated for retail development however consideration will be given as to whether it should be shown wholly as unallocated white land or as part of the Principal Economic Development Area.	Review boundary of the Myrekirk Road site.

5. Suitability of Specific Sites		
Wallace Planning Limited Obo National Grid/Scotia Gas Networks	Gas Holder Site Refer to detailed comments in Development Sites Assessment.	
Graham & Sibbald on behalf of Mr M Mitchell	Land to the rear of the B&Q at King's Cross Road, Dundee specifically allocated for retail warehousing. Not required and would not fit with the Town Centre First approach required by SPP 2014.	

Main Issue / LDP1 Policy / Other Issue (reference & heading)	Main Issue 9 – Goods Range Restrictions	
Officer:	SJ	
Body or person(s) submitting a response (including unique reference number):		
9 – Broughty Ferry Community Council 11 – Dundee Civic Trust 13- Scottish Government (commenting as Key Agency) 15- Professor A R Grieve 19 - (Muir Smith Evans) B.S Pension Fund Trustee Ltd 21- Wallace Planning Limited Obo National Grid/Scotia Gas Networks	24 – Real Find on behalf of Farmfoods Limited 28- Ian Hiddleston 31 – Ares Management (Michael Halliday CBRE Ltd) 33- Philip Duncan 35 – Graham & Sibbald on behalf of Mr M Mitchell 36 – Zander Planning Ltd on behalf of CWP Dundee Ltd	49 – GVA James Barr on behalf of Aldi Stores Ltd. 50 – Stobswell Forum 57 - Friends of the Earth Tayside 61 – Tactran

1. Summary of the Comments to the MIR	
Support Preferred Option	
9 – <i>Broughty Ferry Community Council</i>	Supported option but made no comment.
11 – <i>Dundee Civic Trust</i>	<p>As per comments under Main Issue 6. It is noted that the Dundee Retail Study 2015 strongly recommends adhering to the current policies prioritising the City and District Centres. This is all the more important in the light of the higher than average levels of vacant properties there and the increasing competition from internet shopping.</p> <p>The Trust is sceptical of the Study's findings regarding the potential for significant additional retail floorspace in the city and would be concerned about the impact of an extension of the Overgate Centre on the viability of the Wellgate Centre. We do agree that if it is conclusively demonstrated that there is potential for more shopping</p>

	<p>floorspace in the city this should be directed to the city and district centres, and the extension of the Overgate Centre might then be considered as a longer term option.</p>
<p>13- <i>Scottish Government</i></p>	<p>Paragraph 63 of SPP sets out that where necessary to protect the role of town centres, plans should specify the function of commercial centres, for example where retail activity may be restricted to the sale of bulky goods.</p> <p>The Council has set out that it has a recent Retail Study which recommends applying restrictions on out of centre developments to maintain the strength and viability of the established centres. This provides an evidence base for the Preferred Option, of maintaining the existing controls over the range of goods sold from retail parks and major foodstores, as being necessary to protect the role of town centres - as such we support the preferred option.</p>
<p>19- <i>(Muir Smith Evans) B.S Pension Fund Trustee Ltd</i></p>	<p>Supported option but made no comment.</p>
<p>21- <i>Wallace Planning Limited Obo National Grid/Scotia Gas Networks</i></p>	<p>Goods range restrictions should not apply to a new retail allocation on the Dock Street Gas Holder Site. This reflects the need to encourage a viable development on this site and its proximity to the City Centre Retail Park.</p>
<p>24 – <i>Real Find on behalf of Farmfoods Limited</i></p>	<p>Supported option but made no comment.</p>
<p>28- <i>Ian Hiddleston</i></p>	<p>Supported option but made no comment.</p>
<p>31 – <i>Ares Management (Michael Halliday CBRE Ltd)</i></p>	<p>It should be made clear from the start that SPP, in terms of goods restrictions, states that where necessary, development plans should specify the function of commercial centres and which may include restricting some retail activity.</p> <p>Applying a blanket goods restriction on all retail parks is not an absolute requirement of what SPP paragraph 63 is seeking to apply. It will be dependent on individual circumstance and in particular when it is proven that there is no or limited retail capacity/deficiency and thus a form of restriction is needed to protect town centres.</p> <p>The approach needs careful attention and also needs due reference to paragraph 71 which leaves it for the individual applicant to demonstrate the overall acceptability of certain goods beyond city/district centres.</p> <p>The concern we have in the re-application of Policy 23 lies particularly in ‘Criterion 1’. In that it states rather</p>

	<p>generically that it must not affect the LDP Strategy in support of City Centre and District Centres.</p> <p>While the general ethos is plausible the application is what gives us concern. No detail is provided on how the Council will review such a policy? The crux of the matter is that the LDP Strategy supports town centre first and seeks to resist retail development beyond town/district centres. But this strategy has not fully addressed or built in the fact that there is an identified growing deficiency and one that cannot be met in full within those centres. It fails to include within the strategy where it will meet this shortfall or be more explicit in the allowance of developments beyond the city centre within the related strategy (when shortfalls have been identified).</p> <p>It then creates a 'Grey Area' in interpretation even when a development has shown to be acceptable in terms of the noted Criterion 2 and 3 within Policy 23.</p> <p>In relation to floorspace restrictions for 'Food Stores' we would again note caution with the application of a policy that denotes a specific figure without sufficient evidence to support it. While it is appreciated to be a long standing policy it still requires to be fully justified which we have failed to see within the MIR or Dundee Retail Study.</p> <p>We consider that the application of Policy 24 is more than sufficient to test any future retail development found beyond city/district centres and thus recommend that Policy 23 should be deleted from the forthcoming LDP.</p> <p>It is noted that there is concern that if Policy 23 is lifted or amended it would allow existing retailers to leave the city centre for retail parks. We do not consider this to be the case as this would still require the operator to meet the key policy tests contained within SPP and the aforementioned Policy 24. Should it fail to do so then the asserted proposition could not happen.</p>
<p>33- Philip Duncan</p>	<p>Supported option but made no comment.</p>
<p>35 – Graham & Sibbald on behalf of Mr M Mitchell</p>	<p>Our client supports the goods restrictions placed on out of town retail warehouse locations to protect the City Centre and District Centres.</p> <p>A separate supporting letter was provided which included the following comments:</p> <p>Our client requests that the land to the rear of the B&Q at King's Cross Road, Dundee is specifically allocated for retail warehousing. The client is willing to accept the application of the goods range restriction policy to this site.</p> <p>The site is situated in an area of economic importance to the City located between a Commercial Centre and allocated economic development area. This location currently provides the same retail warehouse offer as the Commercial Centre and the Economic Development Area yet has no policy support to protect the important retailing destination of to support expansion in this location. This site represents an opportunity to expand on the retail warehouse offer in an established retail location. The site forms a natural extension to the existing</p>

	<p>retail warehousing. The allocation of this site for bulky retail development will complement the surrounding land uses and encourage linked trips to the existing shops at this location. It is requested that the Council offers policy support to this retail location.</p> <p>The size of the unit and restricted use will ensure that the allocation of this site for retail warehousing will not impact on the hierarchy of centres. The allocation of this site will provide Dundee with flexibility in terms of suitable retail warehouse locations and will also meet demand for an expanding household goods market.</p>
<i>50 – Stobswell Forum</i>	Supported option but made no comment.
<i>57 - Friends of the Earth Tayside</i>	This is important to limit further displacement of demand from district centres.
<i>61 – Tactran</i>	This will support the retention of shops that are located closer to their catchment population and thereby reduce the need to travel or allow access by a variety of travel modes.
Support Alternative Option 1	
<i>15- Professor A R Grieve</i>	Supported option but made no comment.
<i>36 – Zander Planning Ltd on behalf of CWP Dundee Ltd</i>	<p>We would support the Alternative Option 1.</p> <p>Bulky goods retailing generally as a concept has significantly diminished over the last 10 to 20 years, with the result that very few ‘bulky goods’ retailers remain in today’s market.</p> <p>A high proportion of retailers within retail warehouse units and retail parks are now ‘variety’ retailers who sell a wide range of goods including bulky goods but also in differing levels, food and other general comparison goods.</p> <p>As a result, going forward, retail parks are unlikely to be able to survive solely on ‘bulky goods’ and will require other goods and uses to sustain their own vitality and viability.</p> <p>An appropriate strategy going forward may be to embrace but appropriately control that change in the retail market. Maintaining tight controls over the range of goods that can be sold is only likely to result in future voids, high vacancies and pressure to find alternative uses and occupiers.</p>

49 – GVA James Barr on behalf of Aldi Stores Ltd.	Supported option but made no comment.
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2. DCC Summary of Comments	3. DCC Initial Response	4. Further Consideration
<p>Dundee Civic Trust - Current policies are important especially with high levels of vacant properties and increasing competition from the internet. Sceptical about additional retail floorspace, concerned about the extension to the Overgate and the impact on the viability of the Wellgate. The extension to the Overgate should be longer term.</p>	<p>Comments noted. In line with SPP it is proposed to adopt a refreshed sequential town centre first approach to assess proposals which generate significant footfall, including retail, commercial leisure uses, offices, community and cultural facilities and where appropriate other public buildings such as libraries and education and healthcare facilities. This approach would more fully meet the requirements of Scottish Government and the Strategic Development Plan. This will increase footfall and help maintain and develop the vitality and viability of the City Centre and District Centres and their role within the network of centres within Dundee and the wider TAYplan area.</p> <p>The proposed expansion of the Overgate centre represents the greatest opportunity to increase the retail offer in the City Centre and strengthen its role as a regional centre. This proposal is dependent on an upturn in the market and demand from retailers.</p>	<p>Review and update the current sequential approach in line with SPP 2014.</p>
<p>Scottish Government - The Council has set out that it has a recent Retail Study which recommends applying restrictions on out of centre developments to maintain the strength and viability of the established centres. This provides an evidence base for the Preferred Option, of maintaining the existing controls over the range of goods sold from retail parks and major foodstores, as being necessary to protect the role of town centres - as such we support the preferred option.</p>	<p>Support noted.</p>	<p>Maintain the Goods Range Restrictions.</p>

<p>Wallace Planning Limited Obo National Grid/Scotia Gas Networks - Goods range restrictions would not apply to the new retail allocation on TGHS. This reflects the need to encourage a viable development on this site and its proximity to the City Centre Retail Park.</p>	<p>Comments noted. As noted in the summary of Main Issue 8 it is not intended to allocate any additional sites for convenience goods.</p> <p>The purpose of the goods range restrictions policy is to protect the vitality and viability of the City Centre and District Centres. Scenarios where the range of goods sold in existing or new out of centre retail development would be unrestricted would be where there was no impact on the City Centre or District Centres. As the Retail Study has identified weaknesses in the City Centre and several District Centres the Council cannot anticipate removing a policy approach that maintains control over the range of goods at existing and new retail developments.</p> <p>It is also noted that goods range restrictions do already apply at the Gallagher Retail Park.</p>	<p>Maintain the policy approach to Goods Range Restrictions.</p>
<p>Ares Management (Michael Halliday CBRE Ltd) – It should be clear that SPP states where necessary, development plans should specify the function of commercial centres which may include restricting some retail activity. Applying a blanket goods restriction on all retail parks is not an absolute requirement of SPP para61. It is dependent on individual circumstances.</p> <p>The approach needs careful attention reference to para 71 where it is for the applicant to demonstrate overall acceptability of certain goods beyond city/district centres.</p> <p>The concern in relation to Policy 23 is with criterion 1.</p> <p>The ethos is plausible the application gives concern. No detail is provided on how the Council will review this policy? The LDP Strategy supports town centre first and seeks to resist retail development beyond town/district</p>	<p>Comments noted. The preamble to Policy 23 indicates the function of the three commercial centres. It is intended to review and update the preamble in the proposed Local Development Plan.</p> <p>The policy approach does not comprise a blanket goods restriction on all retail parks. There are differing restrictions across the retail parks and also within them. This approach ensures that there is a balance maintained between safeguarding the City Centre in its role as a regional shopping destination and providing for bulkier retail warehouse goods in out of centre locations.</p> <p>Policy 23 will be reviewed to ensure it is in line with SPP 2014. Whilst the Retail Study forecasts spare convenience and comparison expenditure it emphasises the importance of supporting identified commitments and the existing network of centres. In addition, the City</p>	<p>Review and update the preamble to Policy 23.</p> <p>Maintain the Goods Range Restrictions.</p>

<p>centres. This strategy has not fully addressed there is an identified growing deficiency and one that cannot be meet in full within those centres.</p> <p>It creates a 'Grey Area' in interpretation within Policy 23.</p> <p>In relation to floorspace restrictions for 'Food Stores' concerned about the application of a policy that denotes a specific figure without sufficient evidence to support it. Whilst it is a long standing policy it requires to be fully justified which the MIR or Dundee Retail Study fail to do this.</p> <p>Policy 24 is sufficient to test future retail development found beyond city/district centres. Recommend that Policy 23 should be deleted from the forthcoming LDP.</p> <p>Noted that there is concern if Policy 23 is lifted or amended it would allow existing retailers to leave the city centre for retail parks. Do not consider this to be the case as the operator would still require to meet the key policy test contained within SPP and Policy 24.</p>	<p>Centre has a high level of retail vacancies as such the capacity exists to accommodate spare retail capacity in line with SPP and this furthers its priority for development. The existing Local Development Plan allows for deviation from the town centre first approach where the three tests can be satisfied.</p> <p>In relation to floorspace restrictions, it is the strategy of the Local Development Plan, in line with SPP, to promote the City Centre as the first choice location for the development of new shopping provision. This approach seeks to build on the existing advantages of the City Centre and further develop Dundee's regional shopping role. With the restriction on the floorspace, the policy seeks to protect and enhance the vitality, viability and vibrancy of the City Centre and the district centres. It is the intention to retain the existing restriction on the amount of floorspace dedicated to the sale and display of comparison goods. Applications for retail developments are always judged on their individual merits to ensure they benefit consumers and will not undermine the retail strategy.</p> <p>It is considered that to remove the controls over the range of goods could result in existing retailers located within the City Centre relocating to the Commercial Centres. This would undermine the vitality and viability of the City Centre and its role as a regional shopping centre. The Council has applied the goods range restrictions in a flexible way, and has been prepared to support minor adjustments where that could benefit consumers without undermining the existing primary shopping centres. The restrictions are an important safeguard to avoid damaging the vitality and viability of existing shopping centres, and should be retained to clearly define the roles of</p>	
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	<p>the commercial centres.</p> <p>Policy 24 is an important policy that ensures retail developments take place within identified centres wherever possible, and it protects and enhances the vitality and viability of those centres. It does allow for deviation from the town centre first approach where the three tests can be satisfied. It is intended to maintain this policy approach and to review and update the current sequential test in line with SPP2014. It is not intended to delete Policy 23.</p> <p>It should be noted that the Scottish Government have advised that as the Council has undertaken a recent Retail Study which recommends applying restrictions on out of centre developments to maintain the strength and viability of the established centres, this provides an evidence base for the Preferred Option of maintaining the existing controls over the range of goods sold from the Retail Parks and foodstores.</p>	
<p>Graham & Sibbald on behalf of Mr M Mitchell, Friends of the Earth Tayside & Tactran – Support. This will reduce the need to travel or allow access by a variety of travel modes.</p>	<p>Support welcomed. Comments noted.</p>	<p>Ensure that new developments are accessible by alternative modes of transport and not just the private car.</p>
<p>Zander Planning Ltd on behalf of CWP Dundee Ltd – Bulking goods retailing has diminished. Retailers within retail warehouse units are ‘variety’ retailers selling range of goods. Retail parks are unlikely to survive solely on bulky goods. Controls over the range of goods will create high vacancies and pressure for alternative uses.</p>	<p>Comments noted. The Dundee Retail Study 2015 has advised that restricting the range of goods to be sold in the retail parks should be maintained. The reason for the goods range restrictions approach is to ensure that a balance is maintained between safeguarding the City Centre in its role as a regional shopping destination and providing for bulkier retail warehouse goods in out of centre locations. These restrictions have been maintained consistently. It is considered that a relaxation of controls over the range of goods could result in existing retailers located within the City Centre</p>	<p>Maintain the Goods Range Restrictions.</p>

	<p>relocating to the Commercial Centres. This would undermine the vitality and viability of the City Centre and its role as a regional shopping centre. The Council has applied the goods range restrictions in a flexible way, and has been prepared to support minor adjustments where that could benefit consumers without undermining the existing primary shopping centres. The restrictions are an important safeguard to avoid damaging the vitality and viability of existing shopping centres, and should be retained to clearly define the roles of the commercial centres.</p>	
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5. Suitability of Specific Sites	
<p>Wallace Planning Limited Obo National Grid/Scotia Gas Networks</p>	<p>Gas Holder Site Refer to detailed comments in Development Sites Assessment.</p>
<p>Graham & Sibbald on behalf of Mr M Mitchell</p>	<p>Land to the rear of the B&Q at King's Cross Road, Dundee specifically allocated for retail warehousing. Not required and would not fit with the Town Centre First approach required by SPP 2014.</p>

Main Issue / LDP1 Policy / Other Issue (reference & heading)	Main Issue 10 – Maximising the Benefits of Green Infrastructure	
Officer:	CM	
Body or person(s) submitting a response (including unique reference number):		
6 – SportScotland 9 – Broughty Ferry Community Council 11 – Dundee Civic Trust 13 – Scottish Government 15 – Professor A R Grieve 18 – SNH 24 – Farmfoods Ltd 25 – Homes for Scotland 27 – Strategic Land Scotland Ltd 28 – Hiddleston and Feist 29 – Barratt North Scotland	30 – Scottish Enterprise (commenting as key agency) 34 – West Green Park Residents 38 – Springfield Properties 40 – Gladman Scotland 41 – Miller Homes Ltd 42 – SEPA 46 – Stewart Milne Homes 48 – Dundee Resources Centre 50 – Stobswell Forum 53 – RSPB Scotland 54 – Forth Ports Ltd	55 – Scottish Enterprise (commenting as land owner) 56 – Historic Environment Scotland 57 – Friends of the Earth Tayside 58 – Rapleys 61 – Tactran 62 – Kirkwood Homes Ltd and Linlathen Developments 65 – Dundee International Women’s Centre – Workshop Response 66 – Elderly Workshop Response 67 – Hot Chocolate Consultation 68 – Pupil Council Workshop Response 69 – Youth Council Workshop Response

1. Summary of the Comments to the MIR	
Support Preferred Option	
9 – Broughty Ferry Community Council	The last paragraph on page 53 is a good idea. This would have been appropriate in providing an adequate north and south access to East Linlathen Bridge.

11 – Dundee Civic Trust	The Trust supported the content of the Green Network consultation paper, and this option is in line with that.
13 – Scottish Government	<p>The Scottish Government welcomes that green infrastructure has been identified as a main issue for this LDP, and that the Council is looking at policy changes to reflect this shift to enhancing green infrastructure. The MIR sets out a preferred approach to secure delivery of enhancements to the Dundee Green Network. We also welcome the intention to re-emphasise the importance of green infrastructure and green networks across the Proposed Plan's policies.</p> <p>SPP sets out that development plans should seek to enhance existing and promote the creation of new green infrastructure, which may include retrofitting. The proposal to seek developer contributions to provide on, or off-site provision of new and/ or enhanced green infrastructure and access to the green network, in allowing the taking account of where off-site enhancements may offer best value and benefits to the green network fits with the approach set out in SPP in terms of design-led, context driven approaches.</p> <p>The proposed link within the development plan to the Dundee Green Network planning guidance with its locational specific priorities and aspirational links should ensure that its placemaking approach to the delivery of green infrastructure can be realised and delivered. Through spatially showing the four identified green networks and for each of those parts of the city the new planned developments– it provides a good basis for seeking developer contributions towards the green network. This approach should help developers see their proposal's relationship to the green network and how a contribution whether on or off-site to enhancing the green network would connect with and benefit their development.</p> <p>We would encourage the Proposed Plan's green infrastructure policy to include reference to the qualities of successful places in terms of green infrastructure design. We therefore agree with the preferred approach as set out above and below and the support it will provide for the implementation of paragraph 273 of SPP. Paragraph 273 promotes a movement hierarchy which puts walking and cycling as the priority. The green network will help provide for this especially where it provides for links to locations that people want to walk and cycle to.</p> <p>Related to this issue, paragraph 277 of SPP states that disused railway lines with a reasonable prospect of being reused as rail, tram, bus, rapid transit or active travel routes should be safeguarded in development plans. It is not clear if any such routes exist in Dundee but if they do the SPP policy approach should be applied as appropriate.</p>
18 – SNH	SNH support the Preferred Option for green infrastructure, particularly the introduction of a new policy for provision of new and/or enhanced green infrastructure and access to the wider green network. We were pleased to be able to work with you to develop the draft Planning Guidance on Dundee's Green Network and would be happy to support you in developing the policy and development principles as required. The issues discussed in Main Issue 10 of the MIR were explored in the preparation of the draft Planning Guidance which involved topic leads from several departments of the Council. Planning Authorities are in a better position to apply a broad context to facilitate efficient use of land than developers who are inherently site focused. The evidence-led approach to preparing the draft Planning Guidance helps to set principles for delivery as part of a

	<p>robust means of delivering required green infrastructure and meeting the requirements of Scottish Government and the proposed Tayplan SDP. In that respect, we suggest that you consider adopting the draft Planning Guidance as Supplementary Guidance.</p>
<p>30 – Scottish Enterprise (commenting as key agency)</p>	<p>SE supports intentions to seek to create green networks throughout the Dundee area and supports the approach advocated in the Preferred option in principle. However, SE believes that further consideration must be given to the type, form and scale of development for which contribution will be sought as the reasonableness of requiring all applicants (other than householders) to contribute towards the provision of such open space must be developed further.</p> <p>SE wishes to support and facilitate sustainable economic development and wishes to ensure that onerous obstacles (including requirement for inappropriate contributions) are not imposed on businesses – such requirements could be a deterrent to investment, resulting in negative impact on economic development and employment opportunities not being created.</p> <p>Should the Proposed Plan introduce policies requiring contribution to green networks, SE would wish to be assured that detailed assessment has been made of the economic impact such requirements would have and would request that careful consideration be given to the threshold of such contribution including type of ‘non-householder’ development, value of development and scale of development.</p>
<p>34 – West Green Park Residents</p>	<p>We support the provision of green infrastructure within new developments, and suggest that no further development should be allowed on Site H69. The developer has permission for 100 houses – the full amount allocated in the Local Development Plan. Leaving the remainder of the site without housing allows for green corridors and movement of red squirrels, as well as providing recreational area for residents of new development on Site H69.</p> <p>We understand The Forestry Commission have not been given permission to develop a green corridor east of West Green Park towards Camperdown Park to allow for a red squirrel movement corridor because the field is considered to be prime agricultural land. We would hope that housing considerations therefore do not trump the consideration of the fields in the Western Gateway being prime agricultural locations. West Green Park is on the frontier of the battle between grey and red squirrels and residents have worked hard to protect and encourage red squirrels on WGP. It is imperative that corridors remain around WGP and the remainder of Site H69 forms an important part of the buffer and corridor.</p>
<p>40 – Gladman Scotland</p>	<p>To compliment the release of greenfield land, Gladman Scotland agree with the preferred option. Developments should make provision for onsite green infrastructure and green networks contributions. In doing so, integration of existing neighbourhoods and new developments can be emphasised</p>
<p>42 – SEPA</p>	<p>We support the intention to strengthen the green infrastructure approach within the revised plan in order to align with national and strategic planning documents. We also support the preferred approach that a requirement is placed on developments to contribute to the enhancement of the Dundee Green Network.</p> <p>We note within Appendix 1 of the MIR: Policy Review Schedule, specifically Policy 36 Open Space that it is</p>

intended that this policy will be significantly updated or merged with other plan policies in line with the options put forward in the MIR.

Our strong preference is that a separate policy on green networks is provided within the revised plan. We note from previous correspondence at the pre-MIR stage that it was suggested that a policy on 'Green Networks' would be undertaken, reference is now only limited to 'Green Infrastructure'.

We are of the opinion that a separate policy on green networks with coverage of green infrastructure within an overarching policy may be an appropriate route. Such an approach could assist in aligning the plan with TAYplan2 which places particular emphasis on green networks as having a key role to play in the adaptation to climate change; this aligns with NPF3 which provides a clear link to the potential for green infrastructure in adaptation and resilience. The revised Dundee LDP can have a key role in identifying green networks and infrastructure and highlighting the key role they can play in adapting to climate change.

As outline previously both in our policy review and green network Supplementary Guidance (SG) consultation responses we are seeking within the revised plan that suitable and greater recognition of blue networks within green networks is defined, such recognition is important in seeking to achieve the objectives of the Water Framework Directive to move all surface waters to good ecological status by 2015 and the linkages with the River Basin Management Programme. The Water Framework Directive (2000/60/EC) provides the major driver in Scotland to protect, improve and promote the sustainable use of our water environment, which includes wetlands, rivers, lochs, transitional waters (estuaries), coastal waters and groundwater. Successful implementation of the Directive can also bring wider benefits for developers, communities and for the environment generally, by increasing ecological interest, recreation and amenity, tourism, resilience to flood risk, and regeneration opportunities. River basin management plans are at the heart of the legislation, and represent a huge step forward in the way in which we safeguard and improve the quality of our water environment. Local Development Plans where appropriate can commit development proposals to minimise and mitigate impacts on the water environment and accord with the protection and improvement objectives of the Water Framework Directive.

Coverage of Green Networks within the plan could highlight the role planning and planning authorities have in taking the objectives of the recently published RBMP2 forward in its capacity as a 'responsible authority' under the Water Environment and Water Services (Designation of Responsible Authorities and Functions) Order 2006.

At the proposed plan stage we will require clear evidence in order to avoid any potential objection that as part of the LDP process you have considered the pressures affecting the water environment in your area and assessed how they can help prevent further deterioration and put in place improvements in line with priorities set through RBMP2. The revised plan should seek to adopt an integrated, holistic and sustainable approach to water issues in terms of finding room for water alongside development, as well as seeking to protect and improve water quantity and quality. This aligns with TAYplan2 which provides direction that Local Development Plans should seek 'more widespread use of green infrastructure for water management'. Such measures can contribute to sustainable flood risk management and is in keeping with the Flood Risk Management (Scotland) Act which requires local authorities to exercise their functions to reducing overall flood risk. As a fully

	<p>integrated element within the plan, water management can help to drive the vision, the spatial strategy and inform site specific layouts, ensuring that the siting and design of development is informed by natural flow paths of water through the site.</p> <p>In terms of flood risk, Green Networks can play an important role in connecting rivers with their floodplains and can act as natural barriers. We welcome and support within the MIR that it is identified that the relevant existing policy will be updated to include greater emphasis between green infrastructure and SUDS.</p> <p>TAYPlan2, policy 9 outlines that Local Development Plans and planning decisions will need to consider the water environment to contribute to the objectives of the Water Framework Directive as set out in the respective River Basin Management Plans. Policy 9 furthermore outlines that Local Development Plans will protect and improve the water environment (including groundwater) in accordance with the legal requirements in the Water Framework Directive 2000/60/EC and the Water Environment and Water Services (Scotland) Act 2003 which require greater integration between planning and water management through RBMP.</p> <p>As outlined in our consultation to the draft Supplementary Guidance (SG) on Green Infrastructure there is no recognition within the SG of WFD or RBMP requirements and objectives. As outlined above SEPA and local authorities have a responsibility under the Water Framework Directive to improve the overall ecological status of the water environment (includes water quality and the overall habitat associated with it) this requires to be reflected within the revised plan and site specific objectives/developer requirements identified and set out key pressures, objectives and measures for the water environment.</p> <p>As outlined above national legislation as well as the strategic plan for the area propose a transformative approach to green networks within the region, therefore it follows that this should be reflected in the upcoming Local Development Plan 2. We would expect to see relevant and proportionate coverage of such issues within the revised plan. As discussed previously a meeting to discuss the opportunities with the local authority boundary to meet some of the objectives of the RBMP2 plan for the area may be a useful exercise. This can be arranged at a suitable date following the MIR consultation. We would also direct you to the Water Environment Hub which provides up-to-date information on the status of water bodies in the region.</p>
<p>55 – Scottish Enterprise (commenting as land owner)</p>	<p>SE supports the principles of green infrastructure planning at their Balgarthno landholdings. As highlighted in the supporting 'Development Framework' document, an importance is placed on green infrastructure components such as woodland, open space, watercourses, green space and active travel routes, both within the site and connecting into the network surrounding their landholding, consistent with Scottish Planning Policy.</p> <p>Via the allocation of the SE landholdings in the forthcoming Dundee LDP 2 this will present an opportunity to both protect and indeed enhance the green network in this part of the 'Western Gateway' Green Network Area (No. 4 – Figure 11).</p> <p>It is noted in addressing this matter that the Council are keen to introduce a requirement for development to financially contribute towards the enhancement of the Dundee Green Network on and off-site via a developer contribution. SE consider that on-site provision can be accommodated and agreed with the Council following the terms of Circular 3/12 – Planning Obligations on this matter. In terms of off-site developer contributions SE</p>

	<p>believe that any requirement needs to fully meet the tests of the Circular in terms of relevance, proportionality and reasonableness. The aims behind off site contributions to link to local playparks or the new village centre is understood and would be supported by SE for their landholding at Balgarthno.</p> <p>SE therefore support the preferred option detailed in the MIR, subject to the observations detailed above, re-emphasising the importance of green networks and securing on and off site provision via developer contributions.</p>
56 – HES	No comment.
58 – Rapleys	We agree that a new policy would be appropriate to help encourage delivery of on site or off site green infrastructure. In our representations promoting the Policy designation of the Blackness General Economic Development Area we place a strong emphasis within a proposed vision for the area, founded on a greening of the area generally, facilitated by creating a green pedestrian link between Dudhope Park (Lochee Road) and the GEDA towards Hawkhill.
61 – Tactran	Improving access to green networks will encourage active travel through cycling and walking. Green Networks have a strategic role as part of an integrated transportation network, both within Dundee and as part of the Regional Active Travel strategy and network, as defined in the RTS Refresh 2015 – 2036, recently approved by Scottish Ministers in July 2015. Green Networks have the potential to contribute locally to wider issues and outcomes, as well as to the Regional and National Transport Strategies as well as national cycling and walking strategies. The Dundee Green Network can also assist in tackling congestion and air quality problems as well as linking with planned Park & Ride sites and future integrated transport proposals.
62 – Kirkwood Homes Ltd and Linlathen Developments Ltd	We support the Preferred Option, subject to clarification in a future LDP Policy that contributions or provision of off-site infrastructure can only be required where it satisfies S75 Obligation policy requirements. Development Frameworks, such as at Linlathen, can continue to implement good practice in the delivery of greens connectivity through a planned approach to seek connectivity to existing core paths / green corridors and thereby increase accessibility to existing green spaces.
Support Alternative Option 1	
24 – Farmfoods Ltd	To maintain the current approach of supporting the integration of green infrastructure and green networks across several Local Development Plan policy areas.
25 – Homes for Scotland	Considers that Alternative Option 1 is the only appropriate option here.
28 – Hiddleston and Feist	To maintain the current approach of supporting the integration of green infrastructure and green networks across several Local Development Plan policy areas.

29 – Barratt North Scotland	The preferred option makes sense. There are circumstances where providing 'green space' within a site may have limited benefits and so it would be more appropriate and effective to ensure links to current green infrastructure provision or to pay contributions towards a near-by piece of green infrastructure (core path for example) so that the benefit is realised for the future residents. Notwithstanding the above, it appears that the current approach works and with the integration proposed in Alternative Option 1 – then this would appear to be the best way forward.
38 – Springfield Properties	In bringing forward viable development sites developers have to balance the many requirements of both policy documents and Supplementary Planning Guidance. This can end up as a 'shopping' list of requirements that have to be met. In areas where the market is poor or there are high infrastructure costs or remediation costs on brownfield land, there is a fine balance in developments viability. The council should carefully consider the level of development requirements against the need to bring forward housing land, particularly on brownfield sites. If there are too many financial burdens this could in effect further constrain sites as opposed to help bring them forward.
41 – Miller Homes Ltd	MHL supports the housebuilding representative position conveyed by Homes for Scotland in respect of this Main Issue. In addition, MHL would refer the Development Plans and Regeneration Team to the comments submitted previously at both the Call for Sites stage and in response to the Green Network Consultation in October 2015. These submissions support the Council's Green Network objectives of enhancing the provision of and access to open space in Dundee City by demonstrating how the development of open space and landscaping would be an essential aspect of the Development Options which have been presented to date in support of the land being promoted by MHL for housing at Pitkerro to ensure integration of the development within the existing natural environment.
46 – Stewart Milne Homes	Generally support Alternative Option 1. Development Frameworks and Masterplans can continue to implement good practice in the delivery of green connectivity through a planned approach to seek connectivity to existing core paths/green corridors and thereby increase accessibility to existing green spaces.
54 – Forth Ports Ltd	Alternative Option 1 is supported. Proposals for green networks (and associated contributions) should be related to the nature, form and location of development and accord with the policy tests outlined in Circular 3/2012: Planning Obligations and Good Neighbour Agreements. The Port of Dundee, for example has an established industrial nature and it would not be appropriate to require developer contributions in a location where no adverse impact on the green network would arise. Impacts are appropriately assessed through the planning application process and where necessary, Environmental Impact Assessment. The Local Development Plan should not identify proposals for new green networks, including footpaths and public access which prevent the continued operation of the Port. As the Council is aware, bye-laws are in place which prevent public access to the Port and as acknowledged in Scotland's National Marine Plan, Forth Ports' have international security obligations which also prevent public access.
Support Alternative Option 2	
50 – Stobswell Forum	There are other opportunities to expand on this network through additional walkways and cycleways (on or off road) to link other green spaces and attractions, eg Caird Park Centre of Excellence – Dundee Museum of

	<p>Transport –Stobsmuir Ponds – Baxter Park – DISC – Caird Park Centre of Excellence, circular route, etc. The notion in the document that developers should support the enhancement and protection of the Green Network by a “green network percent” for onsite and off-site provision or for the improvement or establishment of other local links is interesting and should be considered further. This has been used most successfully to support Dundee’s now renowned Public Art Initiative. Such contributions could provide funding for physical works which would make the 20’s Plenty initiative, for which no funding has been allocated, far more effective and self-enforcing.</p>
53 – RSPB	<p>RSPB Scotland welcomes the fact that Dundee council is seeking to maximise the benefits of Green Infrastructure and proposes to introduce a requirement for developments to contribute towards the enhancement of the Dundee Green Network.</p> <p>RSPB Scotland welcomes the Preferred Option but would favour the ‘Alternative Option 2’ if the percentage for green network enhancement is required in addition to (not instead of) the on-site or off-site provision of green infrastructure required under the Preferred Option. Green infrastructure has multiple benefits, as briefly outlined in paragraph 219 of Scottish Planning Policy (SPP) and as discussed in more detail in the Forest Research (2010) report “Benefits of Green Infrastructure” and the Scottish Government (2011) publication “Green Infrastructure: Design and Placemaking”.</p> <p>We do not agree that a percentage-based approach is likely to be overly onerous. A study of the value of greenspace in Aberdeen based on over 50,000 property sales found that local parks resulted in a premium of 9% on nearby house values, and amenity greenspace in the vicinity resulted in a 2.6% premium. This study was cited in a Forestry Commission Research Report: Economic Benefits of Greenspace (Saraev, 2012). Another study (Luttick, 2000) of house sales in the Netherlands, found that houses with a view of a park in a residential area attracted a 7-8% premium. A percentage for green network enhancement is therefore likely to result in a more attractive environment with higher value properties. Developers are therefore likely to be able to more than recoup the relatively small cost associated with the percentage requirement. The cost associated with this is much lower than those related to other developer contributions such as those associated with education and transport infrastructure.</p>
57 – Friends of the Earth Tayside	<p>As per the preferred option but also introduce a percentage for green network enhancement for developments where construction costs are over £1M (as per LDP1 Policy 7 requirement for a percent for art). Developers must then use this funding to support key enhancement projects identified in Supplementary Guidance on Developer Contributions, non-statutory planning guidance on the Dundee Green Network and the LDP2 Action Programme.</p> <p>Whilst supportive of the intention behind the Preferred Option, we believe this requires to be specific and strongly worded, otherwise it would be easy for developers to squeeze out of the obligation or only make a token contribution. A specific percentage contribution would help to bring about valuable enhancements to the Green Network, which should in turn help developers to attract customers. This could be enforced by attaching a condition to all consents. The Council’s Greenspace/Outdoor Access team should be consulted as a matter of course to ensure that the benefits for greenspace, biodiversity and public access are maximised. Neither the Main Issues document nor the Green Network draft Planning Guidance gave sufficient emphasis to the</p>

	importance of actively improving biodiversity and ensuring appropriate maintenance (including litter management) to ensure the quality of the Green Network.
No Preferred Option	
6 – SportScotland	sportscotland does not have a preferred option but would stress that re-emphasising the importance of the green network and green infrastructure – particularly if developer contributions are to be sought – would benefit from an up-to-date Open Space Strategy and an up-to-date Pitch Strategy. These documents will help prioritise actions and investment. We note that work is currently ongoing on a revised Pitch Strategy.
15 – Professor A R Grieve	Strongly opposed to further greenfield development until all available brownfield sites have been fully developed.
27 – Strategic Land Scotland Ltd	<p>Strategic Land (Scotland) Ltd / Iain Bett would like to take this opportunity of offering for consideration a further alternative which could be taken forward in parallel with one of the above options. Whilst the broad aims of this Main Issue are recognised, there is a site specific opportunity to allocate new housing land in accordance with Main Issue 3 Preferred Option and Alternative option 1 which can secure direct and positive interventions to existing green space.</p> <p>An allocation at South Auchray can deliver significant investment to the much needed improvements to Clatto Country Park. In addition, housing here is extremely well suited for access to Templeton Woods and the green circular footway.</p> <p>This is set out in more detail within the report submitted at the Call for Sites stage of the preparation of this LDP. If necessary, further copies can be made available to the Council.</p>
48 – Dundee Resources Centre	Mentioned that a condition ensured that a footpath be joined up in the Western Gateway; this is a more certain approach than relying on guidance (we all know what happened to the guidance given for Sustainable Construction!). <i>Comment noted by DCC – for information it was the planning guidance which helped highlight this opportunity and through discussion between the Council's Planning Division and the Access Officer the condition was attached to planning permission.</i>
65 – Dundee International Women's Centre – Workshop Response	City centre – parks are too far away
66 – Elderly Workshop Response	<ul style="list-style-type: none"> • Would like to access Dighty for a walk but no suitable paths for Elderly at Fintry. • Walking routes to and around Ninewells Arboretum and Riverside Nature Park – easy access by car. • Would like a park to walk around within the area (Coldside). • No enough places for children to play.

	<ul style="list-style-type: none"> • Various areas which are not good for elderly people to get too because of walking distance to access them. • Need more open space for dog walkers and activities for children. • Lack of parks nearby – 10 minute walk. • Need more natural space and greenery. • Want to walk along the Dighty but not easily accessed within Fintry – should be more accessible with seating. • Good play parks and nature walks. • Various good greenspaces in West End but require transport to access them. • Play opportunities e.g. tennis, bowling, play equipment, but limited for older people. • Could improve environment with more green space. • Existing trees within the area get cut down to make more parking. • Shop area could be improved with planters.
67 – Hot Chocolate Consultation	Whitfield – pathways are poor quality and unsafe. Need to be resurfaced paths, better quality finish and better lighting. Overgrown, not maintained and fly tipping. Lots of open space and parks.
68 – Pupil Council Workshop Response	Not enough green space or open space
69 – Youth Council Workshop Response	<ul style="list-style-type: none"> • More protection alongside dual carriageways – plant shrubs • Not enough green space • Improve woodland walks and connect to Trottick Ponds

2. DCC Summary of Comments	3. DCC Initial Response	4. Further Consideration
Broughty Ferry Community Council (9) support the proposal for non-householder development to contribute through developer contributions to the enhancement and protection of the Green Network through on-site and off-site provision, in the right circumstances, to improve connectivity to existing green infrastructure. Suggest that this would have been appropriate in providing access to the East Linlathen Bridge.	Comment noted and the opportunity to improve connectivity to the East Linlathen Bridge will be considered during preparation of the Proposed Plan and through the supporting Site Assessment process.	In collaboration with other Council divisions ensure specific green infrastructure opportunities are highlighted in the Site Assessment Record and this is reflected in the Green Network Planning Guidance.
Scottish Government (13) welcomes that green infrastructure has been identified as a main issue. Scottish Government supports the preferred option and they confirm that this	Comments from Scottish Government noted. DCC agree that reference should be made in the Proposed Plan to the six qualities of successful places. This will be considered and	

<p>approach is consistent with Scottish Planning Policy and welcome the links made to the Green Network planning guidance to ensure a placemaking approach to the delivery of green infrastructure can be realised and delivered. Recommend that the Proposed Plan's green infrastructure policy includes reference to the qualities of successful places in terms of green infrastructure design.</p>	<p>referenced to in terms of a green network/green infrastructure policy.</p>	
<p>SNH (18) supports the preferred option particularly a new policy for provision of new and/or enhanced green infrastructure and access to the wider green network. SNH suggests that the non statutory planning guidance on the Dundee Green Network, which was prepared in partnership between the Council and SNH, is adopted as Supplementary Guidance.</p>	<p>Comments noted from SNH. Consideration will be given to DCC adopting the Green Network planning guidance as Supplementary Guidance.</p>	<p>At this stage, prefer to keep the Dundee Green Network planning guidance as non-statutory guidance. The format of the guidance is a publically available, online, map based document which will be regularly updated throughout the year. A non-statutory document allows for this flexibility.</p>
<p>Scottish Enterprise (30) supports the approach advocated in the preferred option in principle however wish to be assured that a detailed assessment would be made of the economic impact such requirements would have to ensure that onerous obstacles are not imposed on businesses.</p>	<p>Comments noted. Further consideration will be given in the Proposed Plan to the type, form and scale of development for which contribution will be sought.</p>	
<p>West Green Park Residents (34) support the provision of green infrastructure within new developments and support the preferred option. They suggest that no further development should be allowed on site H69 as the developer has permission for 100 houses as per the allocation in the LDP. Highlight that it is their understanding that the Forestry Commission has not been given permission to develop a green corridor east of West Green Park to Camperdown Country Park.</p>	<p>Comments and support noted for green infrastructure in new developments. DCC understands that the Forestry Commission is considering its options for agricultural land in its ownership to the east of West Green Park. Ongoing discussion between DCC and the Forestry Commission highlighted an opportunity to work in partnership to improve the footpath network and connectivity to Camperdown Park from development at the Western Gateway.</p>	<p>In collaboration with other Council divisions ensure specific green infrastructure opportunities are highlighted in the Site Assessment Record and this is reflected in the Green Network Planning Guidance.</p>
<p>SEPA (42) support the intention to strengthen the green infrastructure approach in LDP2 however their strong preference is for a</p>	<p>Comments noted and further discussion planned with SEPA as draft policies prepared</p>	<p>Highlight opportunities through Site Assessment Records and reflect this in Green Network</p>

<p>separate policy on Green Networks with coverage of green infrastructure within an overarching policy as this would align with TAYplan2 and NPF3. Greater recognition of blue networks is sought to achieve the objectives of the Water Framework Directive and the River Basin Management Programme. SEPA highlight that LDPs, where appropriate, can commit development proposals to minimise and mitigate impacts on the water environment. SEPA expect to see relevant and proportionate coverage of water issues in relation to the Green Network in LDP2. In order to avoid any potential objection from SEPA, SEPA state that the proposed plan will require clear evidence that the Council has considered the pressures affecting the water environment in Dundee and assessed how they can help prevent further deterioration and put in place improvements in line with priorities set in RBMP2. SEPA emphasise that local authorities have a responsibility under the Water Framework Directive to improve the overall ecological status of the water environment.</p>	<p>for LDP2.</p>	<p>Planning Guidance.</p>
<p>Scottish Enterprise (55) supports the preferred option and highlights the principles of green infrastructure planning at their Balgartho landholdings. Green infrastructure is planned in the Development Framework for the site in line with SPP. It is considered that on-site provision can be accommodated and agreed with the Council following the terms of Circular 3/12 – Planning Obligations. In terms of off-site developer contributions Scottish Enterprise highlight that any requirement needs to fully meet the test of the Circular in terms of relevance, proportionality and reasonableness. In terms of the site at Balgartho, Scottish Enterprise would support improving connectivity to local parks or the new village centre.</p>	<p>Comments noted and DCC recognises the requirements of Circular 3/12:Planning Obligations and this will be considered further in LDP2.</p>	

<p>Tactran (61) support the preferred option and highlight that Green Networks have a strategic role as part of an integrated transportation network at a local level as well as Regional and National Transport Strategies and national cycling and walking strategies. Tactran highlight that the Dundee Green Network can also assist in tackling congestion and air quality problems as well as linking with planned Park & Ride sites and future integrated transport proposals.</p>	<p>Comments noted. The Green Network planning guidance was produced through a collaborative project with SNH and was prepared in line with local, regional and national strategies and policies. Its status as non-statutory planning guidance allows for it to be monitored and regularly updated in line with any future changes in policies and proposals.</p>	
<p>Kirkwood Homes Ltd and Linlathen Developments Ltd (62) support the preferred option subject to clarification in future LDP policy that contributions or provision of off-site infrastructure can only be required where it satisfies S75 Obligation policy requirements.</p>	<p>Comments noted and DCC recognises the requirements of Circular 3/12: Planning Obligations and this will be considered further in LDP2.</p>	
<p>Support received for the preferred option from Dundee Civic Trust, Gladman Scotland, Historic Environment Scotland and Rapleys.</p>	<p>Support for the preferred option is noted.</p>	
<p>Support for alternative option 1 to maintain the current approach was received from Farmfoods Ltd (24), Homes for Scotland (25) and Hiddleston and Feist (28).</p>	<p>Support noted.</p>	
<p>Barratt North Scotland (29) state that the preferred option makes sense however notwithstanding this it appears that the current approach works and this would appear to be the best way forward with the integration proposed in Alternative Option 1.</p>	<p>Comments noted.</p>	
<p>Springfield Properties (38) state that the Council should carefully consider the level of development requirements against the need to bring forward housing land, particularly on brownfield sites. Too many financial burdens could in effect further constrain sites as opposed to help bring them forward.</p>	<p>Comments noted.</p>	

<p>Miller Homes Ltd (41) supports the housebuilding representative position conveyed by Homes for Scotland (25). In addition, Miller Homes Ltd (41) refers DCC to their comments submitted at the 'call for sites' stage and at the consultation on the Green Network Planning Guidance in respect of land being promoted for housing at Pitkerro.</p>	<p>Comments noted.</p>	
<p>Stewart Milne Homes (46) generally support alternative option 1 and state that Development Frameworks and Masterplans can continue to implement good practice in the delivery of green connectivity through a planned approach to connect to existing core paths/green corridors and green spaces.</p>	<p>Comments noted.</p>	
<p>Forth Ports Ltd (54) supports alternative option 1 and state that proposals for green networks should be related to the nature, form and location of development and accord with the policy tests outlined in Circular 3/2012: Planning Obligations. The LDP should not identify proposals for new green networks, including footpaths and public access which prevent the continued operation of the Port which has bye-laws in place and international security obligations which prevent public access.</p>	<p>Comments noted. DCC recognises the requirements of Circular 3/12: Planning Obligations and this will be considered further in LDP2.</p>	<p>Opportunities are currently being explored by DCC to improve walking/cycling access around the Port.</p>
<p>Stobswell Forum (50) supports Alternative Option 2 and states the proposed 'green network percent' is interesting and should be considered further. Suggest that such contributions could provide funding for physical works which would make the 20's Plenty initiative, for which no funding has been allocated, far more effective and self enforcing.</p>	<p>Comments noted.</p>	
<p>RSPB Scotland (53) welcomes that DCC is seeking to maximise the benefits of green infrastructure and proposes to introduce a requirement for developments to contribute towards the enhancement of the Dundee Green</p>	<p>Comments noted. DCC recognises the requirements of Circular 3/12: Planning Obligations which will be considered further in developing the Green Network policy approach</p>	

<p>Network. Although welcome the preferred option, favour Alternative Option 2 if the percentage for green network enhancement is required in addition to (not instead of) the on-site or off-site provision required under the Preferred Option. RSPB Scotland does not agree with DCC that the percentage based approach is likely to be over onerous and highlight a case study and research in response to this.</p>	<p>in LDP2.</p>	
<p>Friends of the Earth Tayside (57) state that a specific percentage contribution would help to bring about valuable enhancements to the Green Network which should in turn help developers to attract customers. Suggest that this could be enforced by attaching a condition to all consents. Highlight that the Council's Greenspace team should be consulted to ensure the benefits for greenspace, biodiversity and public access are maximised. Note that neither the Main Issues document nor the green Network draft Planning Guidance gave sufficient emphasis to the importance of actively improving biodiversity and ensuring appropriate maintenance to ensure the quality of the Green Network.</p>	<p>Comments noted. The Council's Greenspace team will be consulted with during the preparation of LDP2.</p>	
<p>SportScotland (6) does not have a preferred option but would stress that re-emphasising the importance of the green network and green infrastructure, particularly if developer contributions are to be sought – would benefit from an up-to-date Open Space Strategy and Pitch Strategy which it is noted is being revised.</p>	<p>Comments noted. The Greenspace Team is currently reviewing both the Open Space Strategy and the Pitch Strategy. This review will be reflected in LDP2.</p>	<p>Check progress through ongoing discussion with the Greenspace Team.</p>
<p>Professor A R Grieve (15) no preferred option.</p>	<p>Noted.</p>	
<p>Strategic Land Scotland Ltd (27) offers a further alternative option for consideration which can secure direct and positive interventions to existing green space through a proposed housing allocation. The detail of this is set out</p>	<p>Noted and this proposed allocation will be considered further during the preparation of LDP2.</p>	<p>Highlight opportunities through Site Assessment Records and reflect this in Green Network Planning Guidance.</p>

in the 'Call for Sites'.		
Dundee Resources Centre (48) does not have a preferred option.	Noted.	
Dundee International Women's Centre (65) raised a concern that parks in the City Centre were too far away.	Several areas of open space and play parks can be identified within or close to the city centre with Dudhope Park, Roseangle and the opening of Slessor Gardens with further plans for enhancement it is considered there is suitable access to open space and play provision within the area however further enhancement of the green network and links between this spaces is required.	Will be addressed through new policy provision within the Proposed Plan to enhance green infrastructure within the city.
Elderly Workshop Response (66) highlighted the need to provide better access to areas of open space, parks and assets such as the Dighty, Ninewells Arboretum, Riverside Drive. There was a discrepancy between different areas of the city in terms of access to play parks, sports facilities and the quality of the facilities available to the community.	<p>The response was in line with the intention for maximising green infrastructure throughout the city to help link and enhance access to open space.</p> <p>Area specific concerns with regards to play provision and greenspace will be accessed through the DCC play strategy which is currently under review.</p> <p>In addition the results of the workshop were shared with Local Community Planning Partners as part of the review of Local Community Plans which may be able to address some of these concerns.</p>	Will be addressed through new policy provision within the Proposed Plan to enhance green infrastructure within the city.
Hot Chocolate Consultation (67) – concerns were raised with regards to open space within Whitfield. Whilst it was recognised that there was a lot of open space and parks there were issues relating to maintenance. The pedestrian experience around the area was also an issue with poor lighted and poor maintenance of	<p>The response was in line with the intention for maximising green infrastructure throughout the city to help link and enhance access to open space.</p> <p>Area specific concerns with regards to maintenance, safety and lighting have been shared with Local Community Planning</p>	Will be addressed through new policy provision within the Proposed Plan to enhance green infrastructure within the city.

pathways.	<p>Partners as part of the review of the Local Community Plans which may be able to address some of these concerns.</p> <p>These issues will also be considered in future reviews of the Whitfield Planning Framework which guides regeneration activity within the area.</p>	
Pupil Council (68) – concerns regarding a lack of green space.	The response was in line with the intention for maximising green infrastructure throughout the city to help link and enhance access to open space.	Will be addressed through new policy provision within the Proposed Plan to enhance green infrastructure within the city.
Youth Council (69) – concerns regarding lack of green space and need for improvement along dual carriageways. Need to improve connection to woodland and assets such as Trottick Ponds/	The response was in line with the intention for maximising green infrastructure throughout the city to help link and enhance access to open space.	Will be addressed through new policy provision within the Proposed Plan to enhance green infrastructure within the city.

Main Issue / LDP1 Policy / Other Issue (reference & heading)	Main Issue 11 – Supporting the Delivery of Heat Networks	
Officer:	CM	
Body or person(s) submitting a response (including unique reference number):		
8 – Scottish Water	28 – Hiddleston and Feist	48 – Dundee Resources Centre
11 – Dundee Civic Trust	29 – Barratt North Scotland	50 – Stobswell Forum
13 – Scottish Government	38 – Springfield Properties	53 – RSPB Scotland
18 – SNH	42 – SEPA	57 – Friends of the Earth Tayside
25 – Homes for Scotland	46 – Stewart Milne Homes	

1. Summary of the Comments to the MIR	
Support Preferred Option	
11 – Dundee Civic Trust	No comment.
13 – Scottish Government	We are content that the preferred option complies with SPP. We note that further supplementary guidance may be produced.
18 - SNH	Detailed advice on heat networks is within SEPA's remit. However, we support the Preferred Option as a means of enabling Dundee to reduce carbon emissions as part of a broader suite of measures. There may be synergies between the development of heat networks and green infrastructure if the pipe routes of heat network can be combined with the creation of new footpaths, for example, which should be explored.
28 – Hiddleston and Feist	No comment.
53 - RSPB	RSPB Scotland supports the preferred option as a means to improve energy efficiency and reduce emissions across the city. However, we note that the SEA raises concerns regarding implications for air quality (see response to Main Issue 4) and any new policy must consider air quality.
50 – Stobswell Forum	No comment.

Support Alternative Option 1	
42 - SEPA	<p>Support the proposed use of a “Dundee Heat Network Opportunity Map” to identify sites which can support the development of heat networks within the local authority area. However, we do not support the Preferred Option or Alternative Option 1 which limit the consideration of creating or linking into heat networks to proposals termed “significant development within the opportunity areas” – our understanding is that opportunity areas are the sites identified in the Strategic Development Plan. Some clarification is required regarding what the council consider as significant development.</p> <p>In order to be consistent with SPP and to help deliver the Scottish Governments targets of low carbon heating from district heating, we therefore support Alternative Option 1, with some amendments to the text. For discussion we have provided some suggested wording below:</p> <p><i>“To require all significant development to create or link into heat networks or include capability to progress towards this at a future date, and to evidence this in an Energy Statement. Additional sites identified within the Dundee Heat Network Opportunity Map as opportunity sites will be required to create or link into heat networks or include capability to progress towards this at a future date.”</i></p> <p>SEPA’s position is that all significant/substantial* developments should be required to ensure their heat demand is met through a district heating network sourced by either onsite heat generation or through connection to existing or proposed district heating networks or other significant heat sources identified from the national, or where available, local heat map. This should be achieved through a development requirement or other clear policy commitment for the delivery of the network.</p> <p>(*‘Substantial’ developments may consist of new towns, urban extensions, large regeneration areas or large development sites subject to master planning. Some sites offer significant potential for heat networks due their location, support from the local authority and ‘buy in’ from developers.)</p> <p>SEPA’s Energy Position Statement outlines our position regarding heat, and the expectations we have for this to be incorporated in policies and statements from other bodies.</p> <p>The Scottish Government’s support for low-carbon and renewable sourced heat is outlined in the Scottish Government’s Heat Policy Statement: Towards Decarbonising Heat (June 2015). This sets a target of 40,000 homes to benefit from affordable low carbon heat from district heating, part of an overall target of 1.5TWh of heat to be delivered by district heating by 2020 to both domestic and non-domestic properties. This approach is sought to ensure that renewable heat makes a significant contribution to meeting Scotland’s climate change targets and support the delivery of our renewable heat target.</p> <p>New developments located adjacent to existing or proposed heat networks or significant heat sources should be designed to be capable of connecting to the heat supply. In addition to this, we require the protection of land required for heat network infrastructure to be protected.</p> <p>We expect the policy framework associated with heat networks and district heating should ensure that space is</p>

	<p>safeguarded for future pipework/piperuns and energy centres in significant developments and sites identified as opportunity sites for heat networks and district heating.</p> <p>SPP (paragraph 159) states that LDPS should identify the location of existing/proposed/anticipated heat networks, support their development, and make provision to safeguard land for piperuns that would allow for subsequent connection to heat networks, pipelines and/or energy hubs.</p>
Support Alternative Option 2	
25 – Homes for Scotland	<p>Homes for Scotland acknowledge that the Scottish Government through The Heat Policy Statement: Towards Decarbonising Heat: Maximising the Opportunities for Scotland sets out measures on how low carbon heat can reach more householders, business and communities and a clear framework for investment in the future of heat in Scotland. Homes for Scotland would point out that no householder can be compelled to buy their energy from any particular source. The domestic and commercial energy supply markets are competitive so there can be no suggestion of compulsion to buy energy from any one supplier. Likewise, there can be no compulsion on developers to connect their developments to particular infrastructure. Those would be anti-competitive practices. Moreover, District Heating schemes are not widely-understood and have a chequered history in terms of viability.</p> <p>Homes for Scotland have concerns that this would unnecessarily burden developers through the imposition of having to consider the feasibility to create links into heat networks given that in our opinion there is little in the way of supporting text from the Council as to how this would actually happen. Any Supplementary Guidance would need to consider how the aims of the Council can be achieved in this regard without unnecessarily burdening developers and thereby stifling future development.</p>
38 – Springfield Properties	<p>The Scottish Government has set an ambitious target to meet 11% of Scotland's heat demand through renewable sources by 2020. There has to be flexibility in how this is delivered. The efficiency of homes is continually improving through the ongoing building regulation changes and by 2020 will have substantially improved through cost-effective efficiency measures. There will be a substantial increase in low carbon heat deployment as key technologies begin to reach the mass market. In urban areas, this will be through the roll out of low carbon heat networks that make the best use of local heat sources and stores. In suburban and rural areas, low carbon heating technologies at the level of individual buildings will be necessary. In particular, heat pumps are expected to provide substantial quantities of heat.</p>
29 – Barratt North Scotland	<p>Barratt North Scotland agrees with the comments provided by Homes For Scotland.</p>
No Preferred Option	
8 – Scottish Water	<p>Scottish Water has no preferred option. However, we support the concept of Heat Networks and would note that Scottish Water has recently received recognition for work in this area; most notably it's 'Heat from Sewage' initiative. Scottish Water would welcome engagement with Dundee City Council should any opportunities of</p>

	this nature be forthcoming.
46 – Stewart Milne Homes	Despite SPP driving this agenda, the principle of unilateral delivery is fundamentally flawed as it is neither viable, practical nor marketable for private sector housing. The approach would be better adopted for RSL and / or Council stock.
57 – Friends of the Earth Tayside	<p>Given the urgency of action to reduce carbon emissions, the preferred policy is too restricted in promoting the generation of energy at a community level, and fails to address the importance of saving energy. It also seems to be concerned only with new developments, whereas there is an urgent need to retrofit existing homes, business premises, and public buildings with appropriate renewables generation capacity, energy efficiency improvements, or connection to heat networks. Some of these presumably would also require planning consent and so should be actively promoted via the planning system.</p> <p>There seems to be no indication what fuel would be used to provide the heat. If gas, it would further lock Dundee in to fossil fuels for decades to come. If biomass, it would be fundamentally unsustainable in terms of air quality, carbon emissions, and land use impacts. It would be helpful to know if geothermal energy or heat pumps are being considered.</p> <p>There could be a significant opportunity to establish an anaerobic digestion plant for food and other organic waste which could generate heat for a community, with a commercial partner funding and operating the plant with encouragement from the Council.</p> <p>The Council needs to secure expert guidance to avoid commitment to an unsustainable option.</p> <p>The lessons from the failure to install a heat network when DERL was built, or to install the necessary infrastructure when the Central Waterfront was being reconstructed, should be recognised in the Local Development Plan. Mention should be made of the University of Dundee’s heat network as a positive example, and municipal examples elsewhere.</p> <p>The proposed Energy Statement is a good idea, but to achieve its full potential it should cover the range of options for generating renewable energy, and reducing energy usage, along with the plans for heat derivation and connectivity to a heat network. Or has Policy 29 from LDP 1 been quietly forgotten? It seems that the City Council itself has disregarded the policy, given the failure to incorporate renewable energy generation into all new schools built in recent years (as well as the redevelopment to create Dundee House). These are serious missed opportunities to demonstrate the Council’s commitment to reducing carbon emissions through its own estate, and achieve savings in the education budget.</p> <p>What is really required is a comprehensive approach to energy generation, distribution and use, building on the coverage in LDP1 and including proposals for heat networks. This should take account of the recent proposal to produce a Sustainable Energy and Climate Change Action Plan for Dundee.</p>

2. DCC Summary of Comments	3. DCC Initial Response	4. Further Consideration
Support for the preferred option from Dundee Civic Trust (11), Hiddleston and Feist (28) and the Stobswell Forum (50). Scottish Water (8) notes their support for the concept of heat networks however has not indicated a preferred option.	Support noted.	
Support from Scottish Government (13) for the preferred option and confirmation that it complies with SPP.	Support noted and confirmation that the preferred option complies with SPP.	
SNH (18) supports the preferred option and heat networks as a means of enabling Dundee to reduce carbon emissions as part of a broader suite of measures. SNH highlight that there may be synergies between the development of heat networks and green infrastructure through combining both infrastructure elements with the creation of new footpaths.	Comments noted. This synergy will be explored as policy and guidance is developed.	
RSPB Scotland (53) supports the preferred option. RSPB highlight that the SEA raised concern regarding air quality within this main issue and that this should be considered in any new policy.	Comments noted. This will be considered through the Proposed Plan and the accompanying Environmental Report.	
SEPA (42) state that they do not support the Preferred Option and will only support Alternative Option 1 if the text is amended and clarification is received regarding what the Council considers is 'significant development'. SEPA also provides helpful comments and advice in respect of heat networks.	Comments noted. DCC will consider this further through the preparation of the Proposed Plan. As a Key Agency, SEPA will be consulted during this process.	DCC is working with the Scottish Cities Alliance on the coordination of a standard policy and guidance in Scotland's cities to ensure consistency and compliance with SPP.
Homes for Scotland (25) support Alternative Option 2 to maintain the existing LDP1 approach. Homes for Scotland is concerned that district heating schemes are not understood and have a chequered history in terms of viability. Suggest the Council gives careful consideration to this policy approach so as not to unnecessarily burden developers and	Comments noted. DCC will consider this further through the preparation of the Proposed Plan and will ensure policy approach is in line with SPP and guidance from SEPA.	

stifle future development. Barratt North Scotland (29) agrees with the comments provided by Homes for Scotland (25) .		
Springfield Properties (38) support alternative option 2 and acknowledge the ambitious target set by Scottish Government and suggests that there has to be flexibility in how this is delivered. Highlight that efficiencies continue to be met through the building regulations and new technologies coming into the market.	Comments noted. DCC will consider this further through the preparation of the Proposed Plan and will ensure policy approach is in line with SPP and guidance from SEPA.	
Scottish Water (8) does not have a preferred option however support the concept of heat networks. Scottish Water highlights their ongoing work in this area and would welcome engagement with DCC to explore opportunities in the city.	Comments noted.	
Stewart Milne Homes (46) do not have a preferred option and comment that the concept is not viable, practical or marketable for private sector housing and is more suited to RSL/Council stock.	Comments noted.	
Friends of the Earth Tayside (57) do not have a preferred option and suggest that the preferred option is too restricted. Suggest what is really required is a comprehensive approach to energy generation, distribution and use, building on the coverage in LDP1 and including proposals for heat networks. This should take account of the recent proposal to produce a Sustainable Energy and Climate Change Action Plan for Dundee.	Comments noted.	Preparation of the Council's Energy Action Plan (SECAP) will include support for the development of heat networks. DCC involved in project looking at heat networks in the city. Scottish Cities Alliance looking at a coordinated policy approach in LDPs, including Supplementary Guidance.

Main Issue / LDP1 Policy / Other Issue (reference & heading)	Main Issue 12 – Safeguarding of Waste Management Installations	
Officer:	CM	
Body or person(s) submitting a response (including unique reference number):		
9 – Broughty Ferry Community Council	18 – SNH	50 – Stobswell Forum
11 – Dundee Civic Trust	28 – Hiddleston and Feist	54 – Forth Ports Ltd
13 – Scottish Government	42 – SEPA	57 – Friends of the Earth Tayside
15 – Professor A R Grieve		

1. Summary of the Comments to the MIR	
Support Preferred Option	
9 – Broughty Ferry Community Council	Supported this option but made no comment.
11 – Dundee Civic Trust	Supported this option but made no comment.
15 – Professor A R Grieve	Supported this option but made no comment.
28 – Hiddleston and Feist	Supported this option but made no comment.
50 – Stobswell Forum	Supported this option but made no comment.
13 – Scottish Government	<p>Preferred Option is favoured, but with amendments - The preferred option safeguards existing waste management installations and this is supported by paragraph 184 of SPP. However, we note that the targets are not a cap and Local Authorities should generally facilitate growth in sustainable resource management, paragraph 181 of SPP refers, and the preferred option does not allow for this.</p> <p>If new sites are to be allocated, we would point out that the waste management guidance recommends that potential sites and alternative are set out in the MIR itself to alert communities and the waste management industry ahead of the proposed plan.</p> <p>We would not agree with alternative option 2, as it is contrary to paragraph 184 of SPP which states that Local</p>

	<p>Authorities should safeguard existing waste management installations.</p> <p>We would support the proposed change to policy 40 to include reference to site management plans (appendix 1). This is encouraged by paragraph 187 of SPP.</p> <p>The map-based approach taken in the MIR is positive and encouraged by the Scottish Government.</p>
<p>Support Alternative Option 1</p>	
<p>42 - SEPA</p>	<p>We support the safeguarding of existing waste management installations and the direction that allocation of land on adjacent sites does not compromise waste handling operations. This position is in line with the Scottish Government waste position in the Zero Waste Plan and Scottish Planning Policy. However, we do not consider that the Preferred Option fully meets the requirements of the Scottish Government and the Proposed TAYplan2 SDP as it does not allow for identification or allocation of sites for new or expanded waste management facilities. Subject to our comments below, we therefore support Alternative Option 1, which incorporates the Preferred Option position and allows for the allocation of sites for new or expanded waste management installations.</p> <p>We note that the reason given against Alternative Option 1 states that “It is not necessary to allocate additional sites given the significant capacity within the existing network”, and on page 58 of the MIR reference is made to the SEPA Waste Infrastructure and Capacity tool indicating that there is significant capacity within Dundee’s existing installations. We support the work undertaken to meet the Zero Waste Plan recycling and composting target and the role of the existing waste management network in delivering this. Our comments below are made from the point of view of planning for future waste management and where additional or replacement waste infrastructure may be proposed to support the delivery of the Zero Waste Plan’s targets of recycling 70% of all waste by 2025.</p> <p>Scottish Planning Policy states that, in terms of an assessment of waste capacity, paragraph 181 requires that “Planning Authorities should have regard to the annual update of required capacity for source segregated and unsorted waste, mindful of the need to achieve the all-Scotland operational capacity. However, this should not be regarded as a cap and planning authorities should generally facilitate growth in sustainable resource management.” And in paragraph 186 that “Local development plans should identify appropriate locations for new infrastructure, allocating specific sites where possible, and should provide a policy framework which facilitates delivery...”</p> <p>On this subject, TAYplan2 includes policy 7 which places requirements on the LDP to identify areas that are suitable for (amongst other land uses) waste and resource management infrastructure, and policy to support this. It also identifies that “New strategic waste management infrastructure will be encouraged within or close to the Dundee and Perth Core Areas reflecting the proximity of materials and customers.” It is important that the Dundee MIR is consistent with the policy intention contained within the document, which in itself is</p>

	<p>consistent with the ZWP and SPP.</p> <p>In order to be consistent with the SDP, ZWP and SPP, the LDP we support Alternative Option 1 and in addition to identifying and safeguarding existing waste management sites, the provision of a policy framework which allows for new or expanded waste management facilities to be developed within the plan area, clearly directing where it is considered appropriate for new waste management facilities to be located – for example new allocations, the expansion of safeguarded waste management sites, and, in line with SPP paragraph 186, support for facilities to be provided on industrial, employment and storage and distribution land.</p>
57 – Friends of the Earth Tayside	<p>Whilst agreeing that existing waste management installations should be safeguarded, particularly following the closure in 2013 of the Marchbanks waste management centre, we are concerned at what might justify this appearing as a Main Issue. Is there an actual but unstated threat to any of the remaining installations? Is there a concern that they might have to be privatised?</p> <p>The approach to Waste Management seems to be rather static rather than recognising that this is a fast-changing area of policy and technology, in a world of growing constraints on minerals and other raw materials. Now that the Scottish Government has produced its Circular Economy strategy, the Waste Management section of the LDP should be updated to focus on “waste” as resources and consider how it can best facilitate the transition to a Circular Economy by adapting its waste management installations and encouraging appropriate industrial developments. This should include encouragement of repair and reconditioning to facilitate reuse of materials, as a preferable option to recycling. Industrial developments of this sort should be encouraged, along with community-led repair, reuse and recycling centres, and commercial biodigestion (see comment under Main Issue 11) which is why we favour alternative Option 1.</p> <p>This kind of responsiveness to emerging Government policy and new technological opportunities is necessary if the LDP is not to appear outdated even before it is adopted. The LDP policy on waste and resources management should state the Council’s intention to be innovative and to respond to new opportunities and policy directions as they arise.</p>
Support Alternative Option 2	
54 – Forth Ports Ltd	<p>Alternative Option 2 is supported. SEPA’s Waste Infrastructure and Capacity tool identifies the location of existing waste infrastructure facilities, including two metal recycling facilities within the Port of Dundee. These facilities are operated by tenants within the Port. As the Council is aware port operations are fluid in their nature; goods and materials are transferred in and out of the port and a flexible approach is necessary to accommodate these activities. It is the very nature of port operations which underlies their established permitted development rights (Town and Country Planning (General Permitted Development) Scotland Order 1992 as amended). The Council will appreciate that it is therefore not appropriate to identify fixed locations for recycling facilities within the Port of Dundee. Furthermore, industrial operations which take place in the Port are related to the use of port specific operational infrastructure. Where waste operations have no requirement for such infrastructure, safeguarding of land for these operations prejudices the operation of the port. Recycling and transfer of recycled material by vessel can appropriately take place within port, and whilst Forth Ports do</p>

	not consider it necessary for the LDP to do so, it could recognise that waste recycling, aligned with port operations can take place within the Port.
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2. DCC Summary of Comments	3. DCC Initial Response	4. Further Consideration
<p>Broughty Ferry Community Council (9), Dundee Civic Trust (11), Professor A R Grieve (15), Hiddleston and Feist (28) and Stobswell Forum (50) support the preferred option and provide no further comment.</p>	<p>Support noted.</p>	
<p>Scottish Government (13) state that the preferred option is favoured but with an amendment to facilitate growth in sustainable resource management. Scottish Government encourages the map based approach taken in the MIR.</p>	<p>Comments noted.</p>	<p>Given the capacity within the existing network it is considered to be unnecessary to allocate new/expanded sites. Existing Policy 39 is a criterion based approach which supports new waste management facilities located in the first instance in GEDAs. This may only require minor amendment in the preamble to reflect current national policy. Further discussion to take place with Neighbourhood Services to discuss the future planning of waste management facilities in the city.</p>
<p>SEPA (42) supports alternative option 1 as consider that the preferred option does not fully meet the requirements of SPP and TAYplan2 as it does not allow for the identification or allocation of sites for new or expanded waste management facilities.</p>	<p>Comments noted.</p>	<p>Given the significant capacity within the existing network it is considered to unnecessary to allocate new or expanded sites. Scenarios where the city requires additional waste management facilities would be identified through the council's waste management planning process in advance of any shortfall arising, and future LDPs could safeguard specific sites as required.</p> <p>It is acknowledged that the LDP plays a role in the council's strategy for waste management, however this policy document cannot prevent operators of private waste management facilities from reducing or ceasing operations. The council does have control over its own facilities, which handle the entire city's household waste and a large proportion of the city's trade waste with capacity to handle a</p>

		<p>significant increase in waste at a time when efforts are being made to reduce the level of waste generated. It should also be noted that the council owns land within many of the Economic Development Areas, towards which new facilities would be directed.</p> <p>Consideration will be given to amending the policy to safeguard existing installations unless evidence is presented to demonstrate that the facility is no longer required and that the capacity can be met through an alternative facility.</p> <p>Further discussion to take place with Neighbourhood Services on the future planning of Dundee's waste management facilities.</p>
<p>Friends of the Earth Tayside (57) state that the approach to waste management is static rather than recognising that it is a fast changing area of policy and technology. This policy area needs to reflect the transition to a circular economy advocated in the Scottish Government's Circular Economy Strategy. The LDP should state the Council's intention to be innovative and respond to new opportunities and policy directions as they arise.</p>	<p>Comments noted. Agree this is a fast changing area of policy and technology and the requirements of SPP and TAYplan will be reflected in the Proposed Plan.</p>	<p>Further discussion to take place with Neighbourhood Services on the future planning of Dundee's waste management facilities.</p>
<p>Forth Ports Ltd (54) supports alternative option 2. Highlight that it is not appropriate to identify fixed locations and safeguard land for operations within the port as this will prejudice the operation of the Port of Dundee. A more flexible approach is necessary such as that outlined in LDP1.</p>	<p>Comments noted. Permitted development rights allows for certain activities within the Port of Dundee.</p>	<p>Further consideration will be given to how this proposed policy is worded as it is appreciated that the metal recycler within the port is a private company which could choose to cease operating within the lifetime of the LDP and Forth Ports could utilise the site for another port related use without the need to seek planning permission. Furthermore there is significant capacity within Dundee's network, hence it may be both difficult and unnecessary to safeguard all waste management facilities. The purpose of paragraph 184 of SPP will also be considered.</p>

City Development Department
Planning and Economic Development Division Dundee House
50 North Lindsay Street
Dundee
DD11LS
Email: development.management@dundeecity.gov.uk
Phone: (01382) 433105

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