

REPORT TO: CITY GROWTH AND INFRASTRUCTURE COMMITTEE – 17 NOVEMBER 2025

REPORT ON: DUNDEE LOCAL DEVELOPMENT PLAN - EVIDENCE REPORT

REPORT BY: EXECUTIVE DIRECTOR OF CITY DEVELOPMENT

REPORT NO: 319-2025

1 PURPOSE OF REPORT

- 1.1 The report seeks approval of the Dundee Local Development Plan (LDP) Evidence Report and its submission to Scottish Ministers for the Gate Check process.

2 RECOMMENDATION

- 2.1 It is recommended that the Committee:
- a approves the Dundee LDP Evidence Report as attached at Appendix 1; and
 - b remits the Executive Director of City Development to make any necessary minor changes or updates to the Evidence Report and thereafter submit it to Scottish Ministers for the Gate Check review.

3 FINANCIAL IMPLICATIONS

- 3.1 There are no financial implications arising from the Evidence Report itself. However, the Council must meet the costs of the Gate Check review which will follow submission of the Evidence Report to Scottish Ministers. The cost of the review will depend on the length of the procedure, which is not yet known. An estimated cost based on the experience of other Local Authorities is that the Gate Check review would be around £20,000. Discussions have taken place with Finance colleagues and appropriate provision made within the budget.

4 BACKGROUND

- 4.1 Local Development Plans guide the use and development of land within an area, and indicate where investment in housing, business, leisure and infrastructure will take place over the plan period. Together with the National Planning Framework (NPF4), the LDP constitutes the statutory Development Plan for an area against which all planning applications are assessed.
- 4.2 The review of the Dundee Local Development Plan 2019 is being prepared under a revised statutory process as set out in the Planning (Scotland) Act 2019 and accompanying Development Planning Regulations 2023. A significant change in the process is the requirement to prepare an Evidence Report as the first major stage in plan preparation. The purpose of the Evidence Report is to provide a sound evidence base for preparing the LDP, providing a summary of the necessary information and explaining what the implications of this information are for the development of the plan. The Evidence Report does not contain strategy or policy, nor does it involve the assessment or allocation of specific sites. Rather it provides the information on which these decisions will be founded at the Proposed Plan stage.
- 4.3 The legislation requires that the Evidence Report is approved by the planning authority prior to being submitted to Scottish Ministers for a Gate Check review. Scottish Ministers will then appoint a reporter from the Scottish Government Planning and Environmental Appeals Division (DPEA) to assess whether the report contains sufficient information to enable the Council to prepare its LDP. The DPEA reporter will then either inform the Council that the Evidence Report is sufficient, allowing it to proceed to the preparation of the Proposed Plan, or will send the Council an Assessment Report setting out the reasons why the report is not deemed sufficient with recommendations for improvement. In the latter case, the Council is required to make the necessary revisions and resubmit the Evidence Report to Scottish Ministers.

- 4.4 The Dundee LDP Evidence Report is attached as Appendix 1 to this report.
- 4.5 In preparing the Evidence Report, Officers have had regard to the legislative requirements, particularly relating to consultation and engagement. The broad process has been as follows:
- a Evidence Gathering and Early Engagement - information was collated from a wide range of internal and external sources. This included policy documents, reports, assessments, statistical data, annual audits, infrastructure capacity assessments, and survey work notably a Play Sufficiency Assessment and Place Standard Survey. An extensive range of early engagement activity was undertaken to collect evidence from the public and key stakeholders, including surveys, publicity, workshops and meetings.
 - b Topic Paper Preparation and Consultation - based on the information gathered, ten Topic Papers were compiled as the Council's provisional evidence and these Topic Papers were published for consultation in 4 phases from April 2024 to October 2024.
 - c Evidence Report Preparation - the Evidence Report was prepared based on the content of the Topic Papers and taking into account responses to the survey consultations.
- 4.6 The scope and content of the Evidence Report has been guided by the legislation and the Scottish Government's Local Development Planning Guidance. The structure of the Evidence Report is topic-based and the Schedule format address specific themes. The table below sets out the themes of the Schedules within the Evidence Report and lists where the relevant National Planning Framework 4 (NPF4) policies have been covered.

Evidence Report Schedule	Relevant NPF4 Policy
Climate Change, Mitigation and Adaptation (002)	Policy 1: Tackling the Climate and Nature Crisis Policy 2: Climate Mitigation and Adaptation Policy 10: Coastal Development Policy 11: Energy Policy 12: Zero Waste Policy 19: Heating and Cooling
Biodiversity, Natural Places, Trees, and Soils (003)	Policy 3: Biodiversity Policy 4: Natural Places Policy 5: Soils Policy 6: Forestry, Woodland and Trees Policy 8: Greenbelts
Water Environment, Open Space, Play and Sport (004)	Policy 20: Blue and Green Infrastructure Policy 21: Play, Recreation and Sport Policy 22: Flood Risk and Water Management
Health and Safety (005)	Policy 23: Health and Safety
Design, Quality and Place (006)	Policy 7: Historic Assets and Places Policy 14: Design, Quality and Place Policy 25: Community Wealth Building

Evidence Report Schedule	Relevant NPF4 Policy
Infrastructure First and Local Living (007)	Policy 15: Local Living and 20-minute Neighbourhoods Policy 18: Infrastructure First Policy 24: Digital Infrastructure Policy 32: Aquaculture Policy 33: Minerals
Sustainable Transport (008)	Policy 13: Sustainable Transport
Quality Homes and Site Assessment Methodology (009)	Policy 16: Quality Homes
Business and Industry, Brownfield, Vacant and Derelict Land and Buildings (010)	Policy 9: Brownfield, Vacant and Derelict Land and Empty Buildings Policy 26: Business and Industry
Town Centre First and Economy (011)	Policy 27: City, Town, Local and Commercial Centres Policy 28: Retail Policy 30: Tourism Policy 31: Culture and Creativity

- 4.7 The internal structure of the Evidence Report adheres to the guidance set out in the Local Development Planning Guidance and the theme-based Schedules are split into key topic themes and structured as follows:
- a Introduction;
 - b Evidence Sources;
 - c Summary of Evidence;
 - d Summary of Stakeholder Engagement;
 - e Implications of the Evidence for the Proposed Plan; and
 - f Statement of Agreement/Dispute.
- 4.8 At the Gate Check, the DPEA's assessment of the Evidence Report will be guided by the extent to which there has been agreement or disagreement with the evidence, particularly amongst the key stakeholders. The Council is asked to present a Position Statement which summarises the main areas where the evidence is disputed, and where the DPEA Reporter's attention is likely to be focused. This Position Statement is contained within the Introduction to the Evidence Report.
- 4.9 The consultation on the Topic Papers and subsequent correspondence was the main mechanism through which such areas of dispute were established. Overall, the consultation demonstrated a good level of agreement with the evidence from the parties who responded, particularly the Key Agencies. Information was added or amended in response to comments where appropriate and this is recorded in each Schedule. Nonetheless, there were several areas of dispute which are described in each of the relevant topic based Schedules within the Evidence Report.
- 4.10 During the Topic Paper consultation and further correspondence with stakeholders there were 13 formal disputes across seven of the ten Topic Papers. The disputes cover a range of issues

across the Schedules such as alternative housing need data; balance between development viability and biodiversity; additional retail data; and viability of brownfield land. The DPEA Reporter as part of the Gate Check process will consider these matters during the assessment and determine whether the evidence presented is sufficient for the Council to proceed to the Proposed Plan stage.

- 4.11 In preparing the Evidence Report, the Council is required to seek the views of specific groups of people, and to have regard to those views in its preparation. The Evidence Report includes details of how the Council has sought and taken into account the views of the public at large, children and young people, disabled people, gypsies and travellers, key agencies and community groups. The Evidence Report has been informed by engagement with those likely to be affected by the plan and those involved in its implementation, including key agencies, community bodies, and other stakeholders.
- 4.12 Details of who has been involved in the preparation of each Schedule, and how their input has been considered, are provided within the relevant Schedules. The Council has undertaken a comprehensive programme of engagement to inform the Evidence Report. This has included:
- Topic Paper Consultation: ten thematic topic papers were published over a phased consultation between April 2024 and October 2024. Stakeholders were invited to comment on the evidence, identify gaps, and highlight areas of agreement or dispute.
 - Place Standard Survey: an interactive online survey gathered responses from April 2024 to the end of August 2024, targeting residents, young people, and community groups. A total of 216 responses were received, providing valuable insights into local perceptions of place, accessibility, safety, and priorities for improvement.
 - Play Sufficiency Assessment: a statutory assessment was undertaken to evaluate the quality, quantity, and accessibility of play spaces across Dundee. This included physical audits, public consultation, and GIS-based network analysis with over 300 responses received.
 - Stakeholder Working Groups: targeted sessions were held with key agencies, developers, infrastructure providers, and community organisations. This included participation in the Key Agency Group Collaborative Pilot and thematic working groups on topic paper evidence.
 - Local Place Plans: the Council issued a formal invitation to communities to prepare Local Place Plans from May 2023, supported by guidance. Several groups have expressed interest and two groups have submitted Local Place Plans in 2025.
 - Inclusive Engagement: targeted outreach was undertaken to children and young people. This included tailored events in schools. In addition, the Community empowerment team disseminated surveys amongst Tenants and Residents groups, "Friends Of" groups, schools, community councils and community partnerships/forums.
- 4.13 Subject to approval of the Evidence Report, some additional technical work will be needed to prepare it for the Gate Check, notably inserting full referencing of source documentation and representation as well as confirming embedded hyperlinks to web information. Since information is constantly changing, it may be that minor factual updates will also be needed post approval. Consequently, the recommendation asks members to authorise officers to make such necessary minor changes prior to submission to Scottish Ministers.
- 4.14 Following submission of the Evidence Report to Scottish Ministers, the planning authority will launch a Call for Sites and Ideas towards the end of 2025. This will allow landowners, developers and the community to submit sites they would like considered for inclusion in the

Proposed Plan. The Evidence Report includes a site assessment pro forma which sets out the various elements that are considered when assessing a sites suitability in the Proposed Plan.

- 4.15 The timetable for the review of the Local Development Plan is set out in the Development Plan Scheme 2025, which also includes a Participation Statement detailing how and when people can get involved in the process. The review of the LDP is being undertaken in accordance with this scheme.

5 POLICY IMPLICATIONS

- 5.1 This report has been subject to the Pre-IIA Screening Tool and does not make any recommendations for change to strategy, policy, procedures, services or funding and so has not been subject to an Integrated Impact Assessment. An appropriate Senior Manager has reviewed and agreed with this assessment.

6 CONSULTATIONS

- 6.1 The Council Leadership Team have been consulted in the preparation of this report and are in agreement with its content.

7 BACKGROUND PAPERS

- 7.1 None.

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28 October 2025

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APPENDIX 1**DUNDEE LOCAL DEVELOPMENT PLAN (LDP) EVIDENCE REPORT**

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Dundee Local Development Plan Review



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Introduction (001)

Evidence Report

1.1 This Evidence Report has been prepared by Dundee City Council in accordance with the legislative framework set out in:

- The Town and Country Planning (Scotland) Act 1997, as amended by the Planning (Scotland) Act 2019; and
- The Town and Country Planning (Development Planning) (Scotland) Regulations 2023

The current Dundee Local Development Plan (LDP) 2019 is under review. The Council has set out the timescales and Participation Statement for this review process within the Dundee City Council Development Plan Scheme 2025 ([DED396](#)). The Evidence Report represents the first formal stage in the LDP review process. The Council is required to prepare an Evidence Report prior to the Proposed Local Development Plan. This report provides a robust and proportionate evidence base to inform the preparation and content of the LDP review as well as to support future monitoring and delivery.

1.2 Following approval by the Council, the Evidence Report is to be submitted to the Scottish Ministers for Gate Check. At that stage, a Reporter from the Planning and Environmental Appeals Division (DPEA) will assess whether the evidence is sufficient to allow progression to the Proposed Plan stage.

Summary of Engagement

1.3 The Evidence Report sets out how the Council has sought and taken into account the views of the public, children and young people, disabled people, gypsies and travellers, key agencies, and community groups, in line with statutory requirements. Engagement has focused on those likely to be affected by the plan and those involved in its implementation.

1.4 Details of stakeholders involved in preparing each Schedule, and how their input has been considered, are provided within the relevant Schedules of the Evidence Report. A full summary of the consultation activities and engagement with specific groups, as set out in the statutory requirements, is set out included in Appendix 6.

1.5 The Council has undertaken a comprehensive programme of engagement to inform the Evidence Report, in line with statutory requirements and best practice. This has included:

- Topic Paper Consultation: Ten thematic topic papers were published over a phased consultation between April 2024 and October 2024. Stakeholders were invited to comment on the evidence, identify gaps, and highlight areas of agreement or dispute.
- Place Standard Survey: An interactive online survey gathered responses from April 2024 to the end of August 2024, targeting residents, young people, and community groups. A total of 216 responses were received, providing valuable insights into local perceptions of place, accessibility, safety, and priorities for improvement.
- Play Sufficiency Assessment: A statutory assessment was undertaken to evaluate the quality, quantity, and accessibility of play spaces across Dundee. This included physical audits, public consultation, and GIS-based network analysis.
- Stakeholder Working Groups: Targeted sessions were held with key agencies, developers, infrastructure providers, and community organisations. This included participation in the Key Agency Group Collaborative Pilot and thematic working groups on topic paper evidence.

- Local Place Plans: The Council issued a formal invitation to communities to prepare Local Place Plans from May 2023, supported by guidance. Several groups have expressed interest and submitted Local Place Plans for validation during 2025.
- Inclusive Engagement: Targeted outreach was undertaken to children and young people. This included tailored events in schools utilising the Place Standard tool. In addition, with support from Community Empowerment Team the consultation surveys were shared amongst Tenants and Residents groups, 'Friends Of' groups, schools, community councils and community partnerships/forums.

Structure & Content

1.6 In determining the scope and content of this Evidence Report, the Council has had regard to the legislation and to the Local Development Planning Guidance. The report is intended to be a summary of the evidence and to be proportionate. It is tailored to the nature and character of the Dundee City Council area and the issues affecting it.

1.7 The structure of the Evidence Report is topic-based within the Schedule format which addresses a specific Issue. Figure 1.1 below sets out the Schedules within the Evidence Report and lists where the relevant National Planning Framework 4 (NPF4) policies have been covered.

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Figure 1.1: Evidence Report Schedules and Relevant NPF Policy

1.8 The internal structure of each Schedule chapter follows the following format.

- Issue
- Links to Evidence
- Summary of Evidence
- Summary of Stakeholder Engagement
- Implications of the Evidence for the Proposed Plan
- Statements of Agreement/Dispute

Dundee City Area Profile

1.9 Dundee is located in the Central Lowlands of Scotland, situated on the eastern coast on the north bank of the Firth of Tay. The city features varying topography, from its diverse waterfront along the River Tay to its prominent hills and numerous burns, namely the Dundee Law and the Dighty Burn. The city's boundary captures predominantly urban and suburban land, with a small proportion of peripheral farmland. By landmass, Dundee is Scotland's smallest Local Authority, covering approximately 60 square kilometres, with a coastline of approximately 27 kilometres. The city is bordered by Perth and Kinross Council to the west and Angus Council to the north and east. Fife Council is situated on the southern bank of the Firth of Tay.

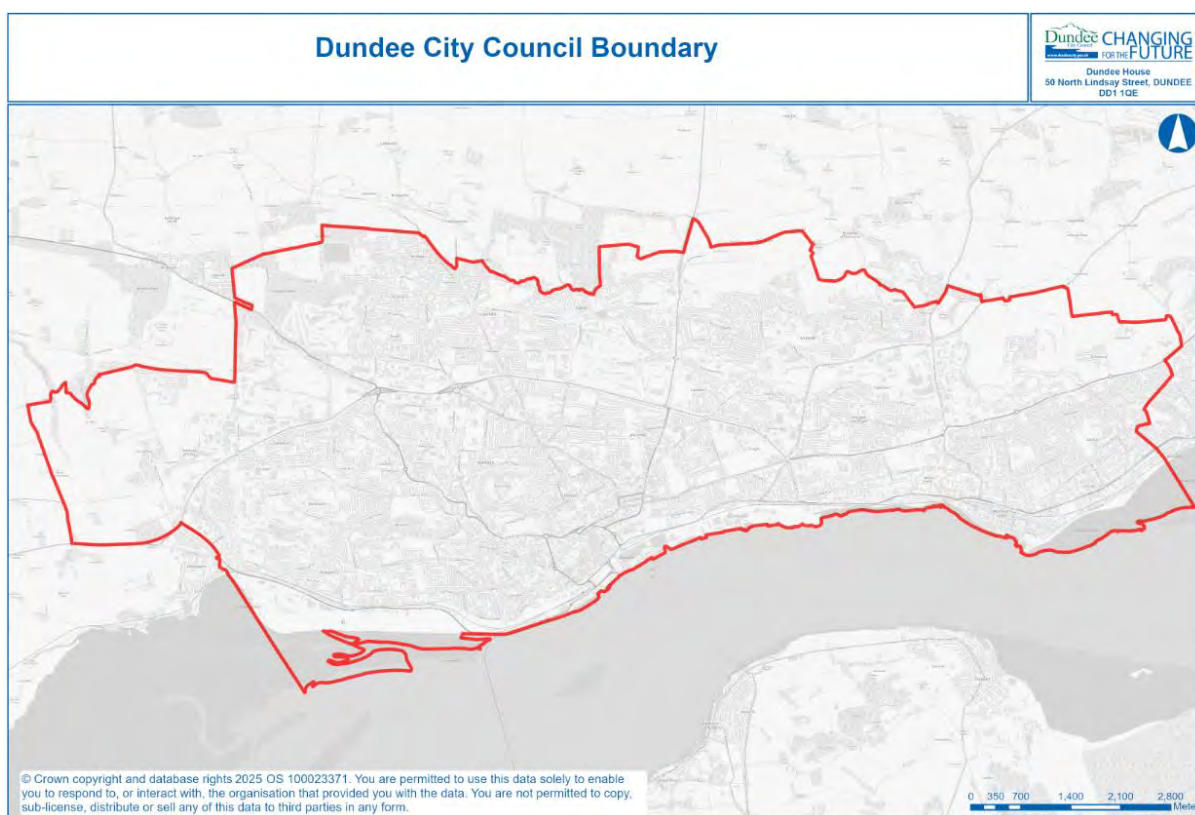


Figure 1.2: Dundee City Council Boundary

- 1.10 By population, Dundee is Scotland's fourth largest city with a 2024 mid-year estimated population of 149,880, a 1.82% (2,680) increase from 147,200 in 2011. This accounts for 2.7% of Scotland's total population and, at 2,506 persons per square kilometre, ranks Dundee with the second highest population density. The city also continues to serve as the regional centre for adjacent areas within the neighbouring Local Authorities, with an estimated catchment population of 400,000.
- 1.11 The city is easily accessible by main road and rail networks. The A90 Edinburgh to Aberdeen Road passes through the city, and the Tay Road Bridge connects to North-East Fife. Regular rail services between Glasgow and Aberdeen, and Edinburgh and Aberdeen stop at Dundee, as do services between London Kings Cross and Aberdeen. Various bus operators provide services between Dundee and Perth, Edinburgh, Glasgow, Aberdeen, Fife and other destinations. Dundee Airport is the most convenient fly-in destination for some 1,000 square miles of Central Scotland. Destinations from Dundee airport include Belfast City and London City.
- 1.12 Dundee's employment landscape is defined by a dynamic mix of innovation-driven sectors, underpinned by a strong academic and research base. The city is internationally recognised for its creative and digital industries, with a thriving games sector, world-class design credentials as the UK's only UNESCO City of Design, and a growing reputation in cybersecurity, virtual production, and immersive technologies. Education and research play a pivotal role, with two universities and a college supporting talent development and sectoral growth. Dundee also hosts significant activity in life sciences and healthcare, anchored by institutions like Ninewells Hospital and the University of Dundee. The city is increasingly active in sustainability and green technologies, aligning with Scotland's net-zero ambitions. Tourism, culture, and business services further contribute to a diverse economy, while high connectivity and digital infrastructure support continued innovation and investment across sectors.

Position Statement

- 1.13 To support the Gate Check process, this Position Statement summarises the key areas where the evidence has either been agreed or remains in dispute. The accompanying Evidence Report consolidates a wide range of data, stakeholder feedback, and technical assessments across critical themes, including climate change, housing, infrastructure, transport, biodiversity, and place-making. It reflects Dundee's distinctive urban context as a compact city with a strong regeneration legacy, a diverse population, and ambitious goals for net zero and climate resilience.
- 1.14 The Evidence Report provides the foundation for the Delivery Programme, which will set out the expected sequencing and timescales for delivering housing and infrastructure. The evidence gathered will inform prioritisation and monitoring of delivery outcomes.
- 1.15 Through the process of consultation and subsequent correspondence on the evidence that was set out within the Topic Papers, a total of 13 formal disputes were submitted, spanning seven of the ten Schedules. This Position Statement provides a high-level overview of the evidence within each topic-based Schedule, a summary of the responses received and identification of where Schedules have been disputed.

Climate Change, Mitigation and Adaptation (002)

- 1.16 This Schedule outlines Dundee's strategic response to the climate emergency, focusing on mitigation, adaptation, and resilience. It aligns with NPF4 Policies 1, 2, 10, 11,

12, and 19 and draws on a wide range of local strategies and data tools, including the Dundee Climate Action Plan, Net Zero Transition Plan, Local Heat and Energy Efficiency Strategy (DED089), and Local Area Energy Plan. It highlights the city's evidence on flood data, fuel poverty, and energy transition challenges, and identifies five priority zones for heat networks: City Centre, Baldovie, Ninewells, Caird Park, and Lochee.

1.17 Key stakeholder comments from NatureScot (STA032) emphasised the interdependence of the climate and nature crises and recommended additional datasets to strengthen the evidence base. SEN Transmission (STA029) requested clearer commentary on electricity transmission infrastructure. Homes for Scotland (STA047) and Hallam Land (STA043) raised concerns about the feasibility and cost of requiring developments to be heat network-ready, suggesting that the focus should be on improving existing buildings. Dundee Civic Trust (STA017) highlighted gaps in solar and hydrogen data and encouraged careful consideration of hydrogen as a green fuel. Historic Environment Scotland (STA004) and several private individuals (STA015, STA027, STA040) expressed agreement with the evidence base.

1.18 There was broad agreement across stakeholders. The comments raised by Homes for Scotland (STA047) and Hallam Land (STA043) were acknowledged and responded to. One formal dispute was recorded from Dundee Civic Trust and has been reflected and responded to in the Schedule.

Biodiversity, Natural Places, Trees and Soils (003)

1.19 This Schedule addresses Dundee's approach to biodiversity, nature networks, protected species, natural places, soils, and trees. It aligns with NPF4 Policies 3, 4, 5, 6, and 8 and draws on evidence from the Dundee Biodiversity Action Plan, Natural Capital Baseline Assessment, and the Dundee Green Network. It highlights the city's designated sites, habitat connectivity, tree equity, and soil health, and sets out the role of planning in protecting and enhancing these assets.

1.20 There was a good level of agreement across stakeholders. NatureScot (STA032) supported stronger references to the nature crisis and recommended additional datasets to improve the evidence base and these were incorporated into the Schedule. Historic Environment Scotland (STA004) supported the evidence base.

1.21 Two formal disputes were submitted from Homes for Scotland (STA047) on the basis of concern of natural assets being a barrier to development and Dundee Civic Trust (STA017) disputed on the basis of seeking additional data to be collected to inform the evidence base and these matters are addressed in the Schedule.

Water Environment, Open Space, Play and Sport (004)

1.22 This Schedule covers Dundee's water environment, open space provision, play sufficiency, and sport infrastructure. It aligns with NPF4 Policies 20, 21, and 22 and draws on evidence from the River Basin Management Plan, SEPA Flood Maps, Dundee Strategic Flood Risk Assessment, Open Space Strategy, and Play Sufficiency Assessment. It highlights the importance of protecting water quality, managing flood risk, enhancing blue-green infrastructure, and ensuring access to play and recreation.

1.23 The Schedule was informed by significant engagement on the Play Sufficiency Assessment which involved a comprehensive city wide survey and helped to identify the quality and quantity of play provision across the city as well as accessibility to these areas.

- 1.24 Key stakeholder comments from consultation and engagement came from NatureScot (STA032) who supported stronger integration of nature networks and blue infrastructure. Sport Scotland (STA021) agreed with the evidence basis. SEPA (STA025) provided technical input and datasets on flood risk mapping and also provided data as part of review and agreement to the content of the Strategic Flood Risk Assessment. Scottish Water (STA024) contributed data on drainage and water infrastructure.
- 1.25 There was general agreement across stakeholders. No formal disputes were recorded.

Health and Safety (005)

- 1.26 This Schedule addresses Dundee's approach to health and safety in the built and natural environment, aligning with NPF4 Policy 23. It includes evidence on public health considerations, air quality, contaminated land, and major accident hazard sites. The schedule draws on extensive healthcare data, food access and food growing data, the Dundee Air Quality Action Plan, and the Dundee Climate Change Risk and Vulnerability Assessment, highlighting the city's Air Quality Management Area (AQMA) and the need to manage environmental risks in a compact urban setting.
- 1.27 Key stakeholder contributions from NHS Tayside, the Dundee Health and Social Care Partnership, and Public Health Scotland have established a robust healthcare evidence based. Agreement on the health infrastructure evidence has been reached through ongoing partnership working with executive level members within NHS Tayside, specifically the Deputy Chief Executive, Sandra Macleod (STA054), and the Director of Facilities & Estates, Gary Mortimer (STA055).
- 1.28 Historic Environment Scotland (STA004) agreed with the evidence base. Homes for Scotland (STA047) raised general concerns about development viability in areas with infrastructure constraints.
- 1.29 There is general agreement on the evidence base. One formal dispute was recorded from Homes for Scotland (STA047), and the summary and response has been addressed in the Schedule.

Design, Quality and Place (006)

- 1.30 This Schedule focuses on data, reports and strategies associated with the historic built environment, urban design, placemaking and community wealth building, aligned with NPF4 Policy 14. It also draws on local surveys and strategies, including the Dundee City Centre Strategic Investment Plan, the Dundee Place Standard Survey, the Key Agency Group Collaborative Pilot carried out in the Maryfield Ward, local place plans, and the Dundee Community Wealth Building Strategy. It highlights the importance of integrating design, placemaking, and community wealth building into spatial planning and ensuring development contributes positively to local character, accessibility, and wellbeing.
- 1.31 Key stakeholder comments from NatureScot (STA032) supported the use of nature-based solutions and place-led approaches. Dundee Civic Trust (STA017) welcomed the emphasis on design and suggested stronger links to heritage and landscape character. Historic Environment Scotland (STA004) agreed with the evidence base.
- 1.32 Homes for Scotland (STA047) and Hallam Land (STA043) do not dispute the evidence but highlight that design requirements need to be understood in the context of the national housing crisis and viability concerns and may require to be more flexible than the established policy approach. Our response points out that the design requirements outlined are largely defined by policy and guidance set at a national level and supported

within NPF4. To what degree these requirements are to be applied in the context of a national housing crisis will have to be considered on a case-by-case basis during the determination of proposed development.

- 1.33 There is broad agreement across the stakeholders on the evidence base. No formal disputes were recorded.

Infrastructure First and Local Living (007)

- 1.34 This Schedule addresses Dundee's infrastructure capacity and the principle of infrastructure-first planning, aligned with NPF4 Policies 15, 18 and 24. It includes evidence on the capacity and condition of education, healthcare, digital infrastructure, and community facilities. It supports and outlines the concept of 20-minute neighbourhoods and local living. The Schedule at Figure 7.7 outlines where the Evidence Report has addressed the requirements, as specified in Sections 15(5) of the 1997 Act (as amended). In addition, the Schedule at Figure 7.8 sets out the Infrastructure Requirements set out in NPF4 and where these matters have been considered throughout the Evidence Report Schedules.

- 1.35 Key stakeholder comments from Scottish Water (STA024) and NHS Tayside provided input on infrastructure capacity and investment plans. Homes for Scotland (STA047) raised concerns about school capacity thresholds and healthcare contributions. SSEN Transmission (STA029) highlighted grid constraints and the need for coordinated energy infrastructure planning.

- 1.36 The majority of respondents confirmed agreement with the evidence base. Comments from Homes for Scotland (STA047) regarding education and healthcare infrastructure were noted and responded to. Two formal disputes were recorded from Hallam Land (STA043) and Taylor Wimpey (STA050) based on disputing a perceived inflexible approach to 20-min neighbourhoods and not being able to view a local living strategy as part of the consultation and these matters have been addressed in the Schedule.

Sustainable Transport (008)

- 1.37 This Schedule covers Dundee's transport infrastructure, travel behaviour, and sustainable mobility, aligned with NPF4 Policies 13 and 15.

- 1.38 The Schedule includes evidence on active travel, public transport and modal shift targets. Comprehensive evidence is also included detailing road condition, congestion trends, emissions data and provides basis for how transport matters intersects with public health and climate goals. Whilst also evaluating the implications of transport poverty, accessibility challenges and demographic shifts.

- 1.39 Key agency stakeholder comments were received from Transport Scotland and TACTRAN (STA030) and the Council worked closely with these organisations to ensure the evidence basis aligned with the detailed comments that were received. This close working relationship ensured agreement was reached from these key parties on the evidence basis as well as on the Proposed Plan implications. Dundee Civic Trust (STA017) highlighted the need for improved public transport and connectivity. SSEN Transmission (STA029) noted the impact of EV uptake on grid capacity.

- 1.40 Significant engagement and correspondence with stakeholders resulted in positive agreement on the evidence basis. No formal disputes were recorded as part of the consultation.

Quality Homes and Site Assessment Methodology (009)

- 1.41 This Schedule sets out Dundee's housing evidence and the methodology for assessing sites, aligned with NPF4 Policy 16. It includes data on housing need, land supply, and the indicative Local Housing Land Requirement (LHLR). It also outlines the site assessment process, including deliverability, accessibility, and environmental impact.
- 1.42 Key stakeholder comments were from Homes for Scotland (STA047) submitted alternative housing need evidence, raised concerns about Local Housing Strategy and Local Housing Land Requirement calculation, queried the windfall assumptions and that any affordable housing contribution approach should be evidence and questioned site deliverability. Hallam Land (STA043) Taylor Wimpey (STA050), Kirkwood Homes Ltd (STA016) echoed these concerns. Dundee Civic Trust (STA017) supported the methodology and emphasised the need for transparency.
- 1.43 Five formal disputes were submitted from Homes for Scotland (STA047), Hallam Land (STA043), Taylor Wimpey (STA050), Kirkwood Homes Ltd (STA016) and Dundee Civic Trust (STA017) and the full response and summary of these matters are addressed in the Schedule.

Business and Industry, Brownfield, Vacant and Derelict Land and Buildings (010)

- 1.44 This Schedule addresses Dundee's economic development land, employment sectors, business development, and the reuse of brownfield, vacant and derelict sites, aligned with NPF4 Policies 25, 26, and 9. It provides information on Dundee's employment land supply, and regeneration priorities through data from the Scottish Vacant and Derelict Land Survey, Dundee Business land Audit, Dundee Employment Land Survey, Dundee Housing land Audit, and strategic local strategies and plans.
- 1.45 General agreement on the importance of brownfield reuse. Key stakeholders Scottish Enterprise (STA056) in agreement with the evidence and support the reuse of brownfield land and the alignment with economic strategies.
- 1.46 One formal dispute submitted by Homes for Scotland (STA047) raised several concerns, which were all resolved with the exception of the request for the proposed Brownfield Urban Capacity Study to be carried out as part of the Evidence Report. Our response clarifies that the study should not be carried out prior to gate check as the Call for Ideas stage and the necessary site assessments need to be included in the study to produce a comprehensive outcome.

Town Centre First and Economy (011)

- 1.47 This Schedule covers the city's network of centres and the retail, tourism, creative and cultural sectors, aligned with NPF4 Policies 27, 28, 30 and 31. It includes national and local policy, data, and strategies, covering trends, vitality, viability, opportunities and challenges across the sectors.
- 1.48 There is general agreement on the evidence base. Historic Environment Scotland (STA004) are in agreement with the evidence. Homes for Scotland (STA047) did not dispute the evidence but state that larger-scale housing developments may be able to create new 20-minute neighbourhoods and that the principle must be applied flexibly considering the local context and the wider social, economic and environmental benefits. Our position is that these comments are more aligned with the Infrastructure First and

Local Living schedule, and more related to the future Call for Ideas and Proposed Plan stages rather than evidence-based submissions. Homes for Scotland also submitted various other comments in relation to the Liveable Neighbourhoods Tool and the Local Housing Land Requirement, which are applicable to, and responded to within, other Schedules in this Evidence Report.

- 11.1 Key stakeholder comments from Dundee Civic Trust (STA017) support town centre regeneration but formally dispute the current data on empty commercial properties in the city centre as they do not capture the ‘fine grain’ data associated with non-declared empty accommodation above occupied ground floor commercial premises. It is proposed that this data can be obtained through a simple drone survey, or through observations from street level. Our position is that such methods would not constitute robust evidence, and they are not straightforward.

Evaluation of Dundee LDP 2019

- 1.49 The Scottish Government’s LDP Guidance requires Evidence Reports to evaluate the extent to which the existing plan has delivered its intended outcomes. The Dundee Local Development Plan (LDP) 2019 was adopted in February 2019, followed by publication of the statutory Action Programme. To support delivery, the Council has subsequently published the Dundee LDP Delivery Programme 2025 ([DED313](#)), which provides a structured list of actions for each policy, associated timescales, sequencing, and integration with national developments.
- 1.50 The Evidence Report includes, within each Schedule, an assessment of the existing LDP 2019 policies and, where relevant, identifies connections to the spatial strategy and implications for the Proposed Plan. A full evaluation of the outcomes and delivery of Dundee LDP 2019 has also been provided in Appendix 1.

Evidence Report Schedule 3s

Climate Change, Mitigation and Adaptation (002)

Issue: Topic / Place	Climate Change, Mitigation and Adaption (DER002)
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland)(Act) 1997, as amended, Section 15(5) • the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district. • any change which the planning authority thinks may occur in relation to any of the matters mentioned above. • the infrastructure of the district. • how that infrastructure is used. • the infrastructure of the district (including systems for the supply of water and energy) Regulation 9 Have regard to • the national marine plan • any regional marine plan
Links to Evidence	Policy 1 Tackling the climate and nature crisis • National Planning Framework 4 (DED201) • Dundee Local Development Plan 2019 (DED088) • Climate Change Plan: third report on proposals and policies 2018-2032 (RPP3) (DED030) • Dundee Climate Action Plan (2019) (DED073) • Dundee Climate Change Risk and Vulnerability Assessment (2024) (DED074) • Dundee City Council Net Zero Transition Plan (DED070) • Friends of the Earth - How Dundee is focusing climate action on helping people most at risk (DED127) • Dundee Local Heat and Energy Efficiency Strategy and Delivery Plan (DED089) • Dundee Local Area Energy Plan (DED087) • Natural Capital and Land Reform: Next Steps for a Just Transition (DED205) • Just transition for the built environment and construction sector: a discussion paper (DED169) • A Fair Energy Future: Unlocking a Just Transition for Consumers (SSEN Distribution) (DED005) • Our Past, Our Future (DED220) • Guide to Climate Change Impacts (Historic Environment Scotland) (DED140) • Advanced Infrastructure LAEP+/Project RESOP (DED235) • Climateview for Dundee 2045 (DED033) • Scottish Biodiversity Strategy to 2045 (DED257) Policy 2 – Climate mitigation and adaptation • National Planning Framework 4 (DED201) • Dundee Local Development Plan 2019 (DED088) • LDP2019 Supplementary Guidance - Air Quality and Land Use Planning (DED015) • Scotland's Climate Change Plan (DED259)

- Dundee Climate Change Risk and Vulnerability Assessment (2024) ([DED074](#))
- Dundee Local Area Energy Plan ([DED087](#))
- Dundee Climate Action Plan (2019) ([DED073](#))
- Dundee City Council Net Zero Transition Plan ([DED070](#))
- Dundee Local Heat and Energy Efficiency Strategy ([DED089](#))
- Just transition for the built environment and construction sector: a discussion paper ([DED169](#))
- Advanced Infrastructure LAEP+/Project RESOP ([DED235](#))
- Climateview for Dundee 2045 ([DED033](#))
- Natural Capital Baseline Assessment ([DED206](#))
- Our Past, Our Future ([DED220](#))
- Guide to Climate Change Impacts ([DED140](#))
- Scottish Water Climate Adaptation Plan 2024 ([DED273](#))

Policy 10 – Coastal Development

- National Planning Framework 4 ([DED201](#))
- Dundee Local Development Plan 2019 ([DED088](#))
- Coastal Change Adaptation Guidance ([DED034](#))
- River Basin Management Plan for Scotland 2021-2027 ([DED249](#))
- Tay Estuary Forum Management Plan ([DED354](#))
- National Marine Plan ([DED256](#))
- Scottish Coastal Observatory Data ([DED260](#))
- SEPA coastal flood maps ([DED035](#))
- Marine Scotland Data Portal ([DED193](#))
- Guide to Climate Change Impacts ([DED140](#))
- Dynamic Coast ([DED108](#))
- Climate Change Allowances for Food Risk Assessment in Land Use Planning ([DED029](#))

Policy 11 - Energy

- National Planning Framework 4 ([DED201](#))
- Dundee Local Development Plan 2019 ([DED088](#))
- Dundee Climate Action Plan (2019) ([DED073](#))
- Draft Energy and Just Transition Plan ([DED060](#))
- Hydrogen Action Plan ([DED162](#))
- Onshore Wind Policy Statement 2022 ([DED219](#))
- Dundee Local Area Energy Plan ([DED087](#))
- Port of Dundee Infrastructure Masterplan ([DED233](#))
- National Marine Plan and Review ([DED256](#))
- Sectoral marine plan: regional locational guidance ([DED275](#))
- Pathway to 2030: A Holistic Network Design for Offshore Wind-ESO ([DED218](#))
- Beyond 2030- ESO ([DED021](#))
- SSEN Network Visibility Strategy ([DED213](#))
- Distribution Future Energy Scenarios 2023 (North of Scotland) ([DED059](#))
- Marine Scotland data ([DED192](#))
- National Grid ESO's interactive map ([DED199](#))
- SSEN Distribution Data Portal ([DED058](#))
- SSEN Local Energy Net Zero Accelerator (LENZA) tool ([DED181](#))

	• SSEN Transmission Assets within Local Authority Boundary (Internal GIS layer) (DED293) • SSEN Transmission Open Data Portal (DED294) • Scottish Energy Statistics Hub (DED321) • Our Past, Our Future (DED220) • Guide to Climate Change Impacts (DED140) • Stannergate 132kV Substation and Network Rail Feeder Station project (DED329) Policy 12 – Zero Waste • National Planning Framework 4 (DED201) • Dundee Local Development Plan 2019 (DED088) • Scotland's Circular Economy and Waste Route Map to 2030 Consultation (DED258) • Dundee City Council Waste and Recycling Strategy & Action Plan 2020-2025 (DED072) • Our Past, Our Future (DED220) • Guide to Climate Change Impacts (DED140) Policy 19 – Heating and Cooling • National Planning Framework 4 (DED201) • Dundee Local Development Plan 2019 (DED088) • Heat in Buildings Strategy 2021 (DED148) • Heat Network Statement – non-statutory planning guidance (DED149) • Dundee Climate Action Plan (2019) (DED073) • Dundee District Heating Strategy (DED079) • Dundee Local Heat and Energy Efficiency Strategy (February 2024) (DED089) • Dundee Local Area Energy Plan (DED087) • Dundee City Council LHEES Webmap (DED183) • Scotland Heat Map (DED254) • Our Past, Our Future (DED220) • Guide to Climate Change Impacts (DED140) • The Building (Scotland) Amendment Regulations 2023 (DED372)
Summary of Evidence	
<u>Policy 1 - Tackling the climate and nature crises</u> National Planning Framework 4 (NPF4) DED201 2.1 Policy 1 Tackling the climate and nature crises encourages, promotes and facilitates development that addresses the global climate emergency and nature crisis. 2.2 The policy outlines that when considering all development proposals significant weight will be given to the global climate and nature crises. Dundee Local Development Plan 2019 DED088 2.3 Tackling the climate and nature crises currently has limited specific mention within the Dundee Local Development Plan 2019. However, climate adaptation, resilience and mitigation are key aims set out in Chapter 8 policies. Scottish Biodiversity Strategy to 2045 DED257	

2.4 This biodiversity strategy sets out a clear ambition for Scotland to be Nature Positive by 2030, and to have restored and regenerated biodiversity across the country by 2045.

2.5 The vision is:

- By 2045, Scotland will have restored and regenerated biodiversity across our land, freshwater and seas.
- Our natural environment, our habitats, ecosystems and species, will be diverse, thriving, resilient and adapting to climate change.
- Regenerated biodiversity will drive a sustainable economy and support thriving communities, and people will play their part in the stewardship of nature for future generations

2.6 This Strategy contains six objectives to continue progress towards halting the loss of biodiversity and being nature positive by 2030:

1. accelerate restoration and regeneration;
2. protect nature on land and at sea, across and beyond protected areas;
3. embed nature-positive farming, fishing and forestry;
4. protect and support the recovery of vulnerable and important species and habitats;
5. invest in nature; and,
6. take action on the indirect drivers of biodiversity loss.

Climate Change Plan: third report on proposals and policies 2018-2032 (RPP3) [DED030](#)

2.7 This plan sets out the path to a low carbon economy while helping to deliver sustainable economic growth and secure the wider benefits of a greener, fairer and healthier Scotland in 2032. It includes proposals and policies to reduce emissions from electricity generation, housing, transport, services, industry, forestry, peatlands, waste, and agriculture.

Dundee Climate Action Plan (2019) [DED073](#)

Dundee Climate Change Risk and Vulnerability Assessment (2024) [DED074](#)

2.8 In June 2019, the Council declared a Climate Emergency, recognising the serious and accelerating environmental, social and economic challenges faced by climate change.

2.9 To respond to this challenge, a partnership Climate Action Plan was prepared, led by Dundee City Council and co-designed with public, private and community organisations, recognising that a concerted city-wide effort is required. It represents the first set of actions in a long-term pathway to first surpass the Covenant of Mayors target of 40% reduction in greenhouse gas emissions by 2030 and then to achieve net-zero greenhouse gas emissions by 2045 or sooner.

2.10 The Plan includes four themes of Energy, Transport, Waste and Resilience with each theme including an initial set of actions to reduce emissions or adapt to a changing climate, considering existing projects, stakeholder priorities and national initiatives. Sixty-four actions have been identified in the plan, including measures to:

- reduce the consumption of energy, promote energy efficiency and increase the proportion of power and heat from low and zero carbon technologies;
- encourage active travel through walking, cycling and public transport and deploy sustainable alternatives to decarbonise transport;
- manage waste sustainably by reducing, reusing, recycling and recovering waste to improve resource efficiency whilst working towards a circular economy; and
- ensure our communities, green networks and infrastructure are adaptable to a changing climate and reduce the risks and vulnerability to unavoidable impacts.

2.11 To help inform the plan, a Climate Risk and Vulnerability Assessment (CRVA) was carried out. It determines the nature and extent of climate-related risks by analysing potential hazards and assessing the vulnerability that could pose a potential threat or harm to people, property, livelihoods and the environment of Dundee. The process highlighted how important collaboration is between sectors (e.g. biodiversity / green infrastructure / health / flooding) and that adaptation requires a multi-disciplinary

approach, where actions cannot be considered in isolation. Climate resilience actions aimed at ensuring the city's services, infrastructure and communities can adapt to a changing climate were then co-designed with stakeholders and incorporated into the Plan.

2.12 The Dundee Climate Action Plan was reviewed and updated by the Dundee Climate Leadership Group in 2024. A new Climate Change Risk and Vulnerability Assessment took place to assess risks and prioritise actions under the 2- and 4-degree scenarios. Climate Ready Tayside is a new regional partnership that began in January 2024, supported by Adaptation Scotland. It focuses on climate adaptation across the Tayside region by identifying connections between existing Climate Risk and Vulnerability Assessments and exploring opportunities for regional climate resilience projects. The partnership also aims to strengthen engagement and communication around resilience to ensure a more coordinated and impactful approach across the region

Dundee Net Zero Transition Plan 2024-2030 [DED070](#)

2.13 This plan sets out how Dundee City Council will achieve its organisational goal of net zero emissions by 2038 by reducing emissions across these sectors:

- Stationary Energy – Buildings and streetlighting
- Transport – Fleet, business and service travel
- Waste – Dundee City Council waste

2.14 Specific actions are set out by service area to achieve emission reductions.

Case Study (January 2023) - Friends of the Earth - How Dundee is focusing climate action on helping people most at risk [DED127](#)

2.15 Over 10,000 UK neighbourhoods are particularly vulnerable to the impacts of the climate crisis. Generally, people living in these areas are the least responsible for the crisis and are least equipped to respond. Some impacts of climate change are already locked in even if we take robust action on mitigation.

2.16 Dundee City Council is developing climate policies by identifying residents most at risk of extreme weather events and fuel poverty and targeting support at these groups. This is a fairer approach to tackling climate change because it protects those most at risk from the climate crisis.

2.17 Dundee City Council has calculated that 31% of the city's households are affected by fuel poverty, which is above the Scottish national average. The city's location also leaves it vulnerable to extreme, unpredictable weather events such as flooding.

2.18 By using digital tools and resources such as the Place Standard Tool, ClimateView and Climate Just, the Council was able to understand where people are facing social deprivation and are most vulnerable to climate threats.

2.19 The authority is also partnering with the NHS to build a risk register, pulled together by a Risk Management Officer (a role created by NHS Tayside but based at the council), to foster collaboration on winter management plans. This register will identify residents facing extreme weather such as storms, flooding and snow. It will also record the impacts that these events can have, such as interruptions in power supply, heating and water. The tool will help adapt winter management plans into climate risk plans.

Dundee Local Heat and Energy Efficiency Strategy and Delivery Plan 2024-2028 [DED089](#)

2.20 The requirement for a Local Heat and Energy Efficiency Strategy was introduced by the Scottish Government to drive forward heat decarbonisation and better energy efficiency in buildings.

2.21 Dundee's Local Heat and Energy Efficiency Strategy (LHEES) is an important strategic plan for the city. It highlights key steps for reducing heating related carbon emissions, enhancing the energy efficiency of buildings, and addressing fuel poverty. It will help to tackle the city's climate emergency and meet its net zero target whilst also improving the thermal comfort and health and wellbeing of residents and offering the potential for new economic opportunities in the city.

2.22 The Delivery Plan details how the Council plans to implement the key actions in the Strategy. LHEES has two core functions and six scopes, referred to as considerations in the guidance.

Core Function	Considerations	Description
Heat Decarbonisation	Off-gas buildings	Transitioning away from oil and LPG in off-gas properties.
	On-gas buildings	Transitioning away from natural gas in on-gas properties
	Heat networks	Identifying potential heat networks for decarbonisation of heat.
Energy Efficiency Improvement	Poor building energy efficiency	Identifying possible locations at a strategic and delivery level where poor building energy efficiency exists across the Local Authority area. Target measures to improve the energy efficiency.
	Poor building energy efficiency as a driver for fuel poverty	Identifying possible locations at a strategic and delivery level where poor building energy efficiency acts as main driver for fuel poverty. Target measures to remove poor energy efficiency as the cause of fuel poverty.
	Mixed-tenure, mixed-use and historic buildings	Identifying buildings of mixed-tenure or mixed-use, historic buildings, listed buildings, and conservation areas. Target measures to improve energy efficiency and decarbonise heating for these buildings.

Figure 2.1 – What is the LHEES aiming to do?

: https://www.dundee.gov.uk/sites/default/files/lhees_strategy.pdf

Dundee Local Area Energy Plan [DED087](#)

2.23 The Dundee City Council Local Area Energy Plan (LAEP), developed in collaboration with Scottish and Southern Electricity Networks (SSEN) through the RESOP project, was published in September 2024, creating a route map to guide the Council in meeting its net zero goals and climate emergency declarations. Led by the Dundee Climate Leadership Group (DCLG), the LAEP provides an understanding of the nature, scale, rate, and timing of the changes needed for Dundee to transition to a net zero energy system by 2045, and describes the priority interventions, and recommended actions that will support the city in delivering its net zero target.

2.24 The LAEP incorporates outputs from Dundee's statutory Local Heat and Energy Efficiency Strategy (LHEES) and captures the wider components of power and transport, energy distribution systems and storage. The LAEP provides a pathway towards net zero through the implementation of various interventions including retrofit; heat networks; heat pumps; solar PV; battery storage and building on the EV infrastructure and network resilience.

2.25 This is a dynamic document that will evolve in response to various factors affecting Dundee's technological capacity and climate targets. SSEN and National Energy System Operator are actively mapping current grid capacity and forecasting future energy demand. Planned grid enhancements will influence the city's ability to deploy technologies such as photovoltaic (PV) systems. The plan acknowledges that target figures may shift as further analysis is conducted and aligns with current government strategies and objectives.

Natural Capital and Land Reform: Next Steps for a Just Transition [DED205](#)

2.26 Scotland is embarking on significant land use change to meet climate and nature goals. Land reform and wider changes to land, tax, and fiscal policy need to work in coordination to make this a just transition

– one which will meet the needs and ambitions of Scotland’s people and put the economy in a stronger, more resilient position.

2.27 The Scottish Government has set out a bold direction of change to deliver on climate and nature goals and to make a just transition. Market activity alone is unlikely to deliver the just transition sought, but both the land market and emerging carbon and nature markets are shaped by public policy. Stronger regulation of these markets is necessary to shape them in the public interest.

2.28 The opportunity is for a well-planned approach which actively shapes land use change in the public interest. This will ensure that the change driven by net zero is one which drives wider rural regeneration, meets the needs and ambitions of Scotland’s people, and puts the economy in a stronger, more resilient position.

Just transition for the built environment and construction sector: a discussion paper [DED169](#)

2.29 This discussion paper is intended to support engagement on a just transition for the built environment and construction sector. The paper states that the built environment and construction sector currently accounts for around 40% of our emissions in Scotland. The sector will underpin the delivery of our net zero future throughout Scotland, delivering our homes, schools, hospitals and workplaces. Construction accounted for £6.6 billion of Gross Value Added (GVA) in 2020, 8.1% of Scotland’s total GVA. With a turnover of £17 billion (8.2% of Scotland’s total) in 2020, the sector provided employment to 158,000 people in 2021. The paper outlines that this will be the engine of our transition, delivering the necessary revolution in retrofit and buildings fit for the future.

2.30 A focus on standards in the construction sector will be critical for emissions reductions, sustainability, climate resilience and, crucially, for attracting the skilled and diverse workforce required to deliver these. Within the Themes for Discussion is:

THEME 5: Maximising the manufacturing base in Scotland

2.31 The discussion paper states that the scale of what is required here presents huge opportunities for the industrial base in Scotland. Work is already being undertaken to revitalise manufacturing with the development of Michelin Dundee Innovation Park and the National Manufacturing Institute Scotland signalling our intent around industry-led delivery of net zero. The transition of the buildings offers the opportunity for this to expand even further; identifying the correct interventions and getting the sequencing of this right to establish markets and drive demand will be key. For instance, a recent study commissioned by the Centre for Local Economic Strategies explores the potential of registered social landlords to develop the retrofit supply chain in the south of Scotland.

A Fair Energy Future: Unlocking a Just Transition for Consumers (SSEN Distribution) [DED005](#)

2.32 This strategy document sets out the distribution network operator’s plan to protect consumers from being unfairly disadvantaged as we move towards the net zero energy system.

2.33 "A Fair Energy Future" outlines the partnerships and projects that SSEN has undertaken to explore and understand the new energy challenges consumers will face in the next two decades. To address these critical issues, SSEN has developed an action plan for delivering a just transition for energy consumers. This plan includes 10 commitments that SSEN will pursue, along with further recommendations for the energy industry and policymakers to help unlock the benefits of net zero for all consumers. It considers all aspects of achieving fairness in the future energy system for workers, consumers, suppliers, and communities.

2.34 One such project is Regional Energy System Optimisation Planning (RESOP) which Dundee City Council have been trialling in partnership with SSEN.

2.35 This new tool helps councils to make better informed decisions about the location of low carbon infrastructure. The tool incorporates social demographics and network data and can be broadened out to include information from gas and water utilities to provide council planners with whole system insights.

Our Past, Our Future [DED220](#)

2.36 The important connection between the historic environment and the climate and nature crises is reflected in this Historic Environment Scotland strategy. It sets the direction of travel for the historic environment sector including identifying Scotland's historic environment as a priority in *Delivering the transition to net zero*. It highlights the importance of the maintenance, reuse and adaptation of our historic environment in preventing waste and reducing carbon emissions.

2.37 Scotland's traditional building stock is a unique asset, with around a fifth or more of Scotland's homes being traditionally built. Care must be taken to ensure that changes associated with matters of adaptation and energy efficiency are made in such a way that values and characteristics are protected and conserved for future generations to enjoy. The main risks are around poor-quality installation of fabric improvements or fabric improvements which use inappropriate materials. This could lead to problems, such as mould growth, which can in turn lead to adverse effects on health and building fabric.

Guide to Climate Change Impacts (Historic Environment Scotland) [DED140](#)

2.38 This strategy sets out many of the risks and hazards of climate change that are facing Scotland's historic environment and offers routes to take action, to implement adaptation measures and enhance resilience to climate change.

Data

Advanced Infrastructure LAEP+/Project RESOP [DED235](#)

2.39 Project RESOP (Regional Energy System Optimisation Planning) aims to take a 'whole system' approach, by drawing together data from multiple sources into a single tool that can be used to plan retrofit and roll out of low carbon technologies (LCTs) like electric vehicle charge points. This will help local authorities plan decarbonisation pathways by enabling LCTs to be sited in cost-effective locations whilst providing early warning to SSEN of additional demand on the network.

2.40 Project RESOP (Regional Energy System Optimisation Planning) was formed in 2020 by Scottish and Southern Electricity Networks (SSEN) under Ofgem's Network Innovation Allowance (NIA). The project brings together a range of stakeholders, including Dundee.

Use Case: Informing a heat strategy

2.41 As part of RESOP in Dundee, work has been carried out with several data providers using innovative data inference techniques to map suitability for different heating types across the area. Including:

- Heat network potential zones
- Building level suitability for domestic heat pumps
- The existing gas network
- The water network

2.42 In Dundee, total heat demand is estimated to be 950GWh. There are 242 anchor loads which provide 45% of heat or 430.9GWh of anchor load demand. By overlaying heat network potential polygons, users can start to identify homes which might sit within heat networks or are likely to need alternative heating sources - like heat pumps.

2.43 To support further analysis of heating potential, RESOP produced desktop assessments of building-level suitability for domestic heat pumps (pictured below) - as well as building-by-building modelled heat demand.

2.44 This data was used to inform the Local Heat and Energy Efficiency Strategy (LHEES).

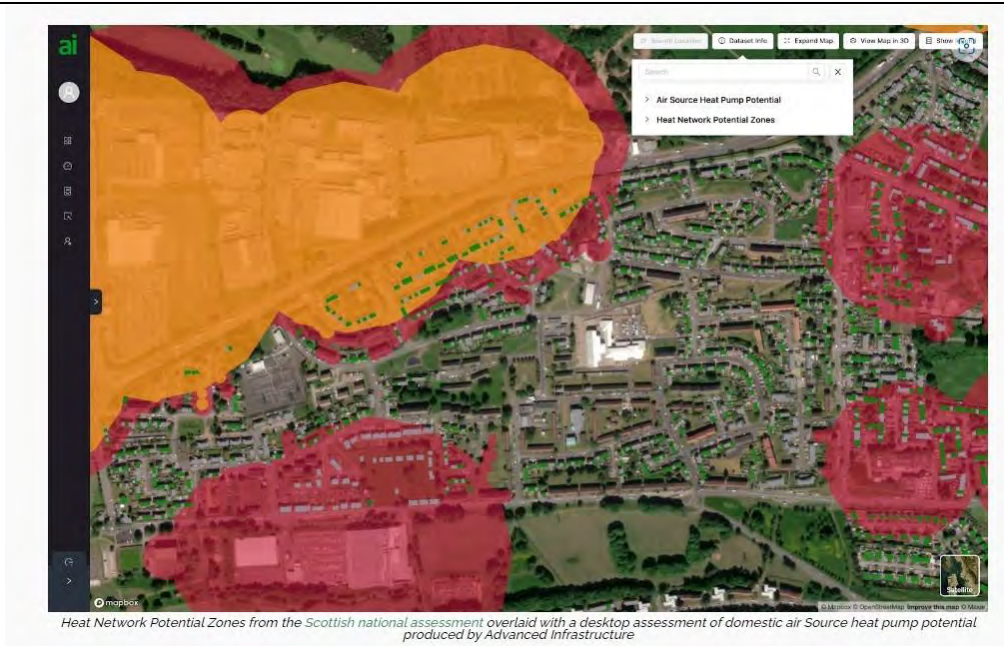


Figure 2.2: Building-level suitability for domestic heat pumps

Image reference: [Project RESOP \(Regional Energy System Optimisation and Planning \) \(advanced-infrastructure.co.uk\)](https://advanced-infrastructure.co.uk/)
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Use Case: Siting Rooftop PV

- 2.45 How much local renewable generation can an area support? This is a key data point for planners working on a Net Zero transition pathway.
- 2.46 The RESOP work in Dundee explains that using data on property type, roof type, roof size, and roof orientation they calculate the overall suitability, viable roof area, and estimated yearly outturn (kWh) of a PV array installed on the roofs of buildings across areas like Dundee.
- 2.47 This data in turn can inform Scottish and Southern Electricity Networks future network investment decisions to support targeted investment in the network where it is needed most.

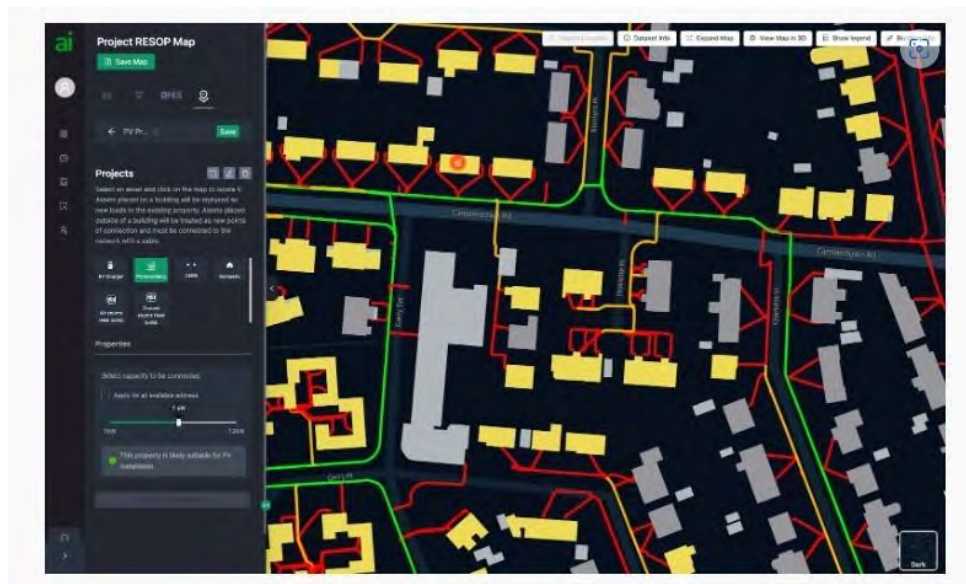


Figure 2.3: Siting Rooftop PV

Image reference: [Project RESOP \(Regional Energy System Optimisation and Planning \) \(advanced-infrastructure.co.uk\)](https://advanced-infrastructure.co.uk/)

Climateview for Dundee 2045 DED033

2.48 Dundee's pathway to net-zero – This data source has been assembled to provide an overview of all the shifts needed to reach net-zero. Data is available from Dundee City Council's Sustainability and Climate Change team.

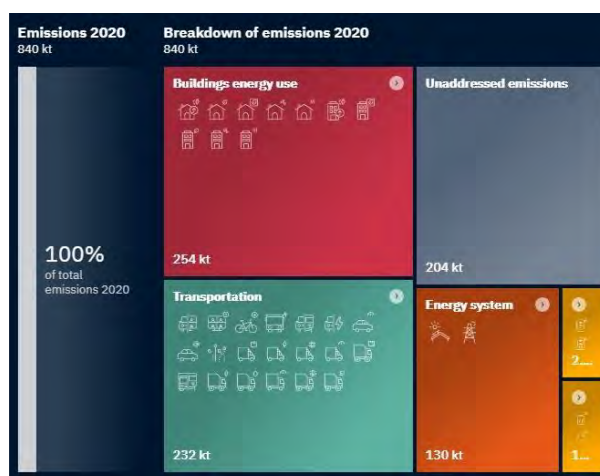


Figure 2.4 – Transition for Dundee

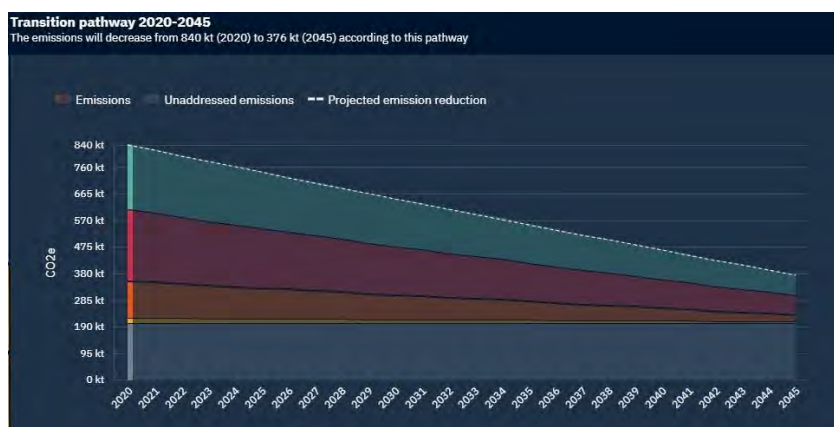


Image reference: <https://app.climateview.global/v3/public/board/40305d84-117a-41e0-a92c-f92d5cb6ac9f>

Policy 2 – Climate Mitigation and Adaptation

National Planning Framework 4 (NPF4) [DED201](#)

2.49 Policy 2 Climate Mitigation and Adaptation aim to encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change.

2.50 The policy outlines that LDP spatial strategies should be designed to reduce, minimise or avoid greenhouse gas emissions. The six spatial principles should form the basis of the spatial strategy, helping to guide development to, and create sustainable locations. The strategy should be informed by an understanding of the impacts of the proposals on greenhouse gas emissions. LDPs should support adaptation to the current and future impacts of climate change by taking into account climate risks, guiding development away from vulnerable areas, and enabling places to adapt to those risks.

Dundee Local Development Plan 2019 [DED088](#)

2.51 There is not a specific policy within the Dundee Local Development Plan 2019 covering the topic of climate adaptation and mitigation. However, this theme is broadly addressed through Chapter 8 policies including Policy 37: Sustainable Drainage Systems and Policy 48: Low and Zero Carbon Technology in New Development.

LDP2019 Supplementary Guidance - Air Quality and Land Use Planning [DED015](#)

2.52 Dundee City Council has Supplementary Guidance to compliment Policy 44: Air Quality of the Dundee Local Development Plan. An Air Quality Management Area covers the whole Dundee City Council boundary area.

2.53 Air quality may be a material consideration in determining applications for planning permission dependent on the nature, scale and locations of the proposed development. For example:

- through direct impact on air quality e.g. resulting from the particular business or use of land proposed;
- cumulative impact i.e. as a result of a number of developments which when added together would have a significant effect on air quality;
- indirect impacts e.g. as a result of traffic generated by the proposed land use;
- exposure e.g. through introducing new human exposure into areas of known poor quality without appropriate mitigation measures in place.

2.54 Cumulative impacts may also affect air quality at locations that are a considerable distance from the new development.

2.55 It is also a material consideration when a proposed development would:

- be affected by existing or potential sources of pollution;
- conflict with or render unworkable, any elements of the approved Air Quality Action Plan which have a land use aspect. For example measures contained within the Action Plan can be compromised when significant levels of traffic, parking provision or servicing are generated by proposals which affect a local area sensitive to air quality issues, or
- result in pollutant concentrations rising to a level where designation of a new Air Quality Management Area becomes necessary.

Scotland's Climate Change Plan [DED259](#)

2.56 The Scottish Government statutory strategic delivery plan is published at least every 5 years and sets out national commitments to deliver on emissions reductions targets and ensure a green recovery.

Dundee Climate Change Risk and Vulnerability Assessment (2024) [DED074](#)

2.57 This assessment helps to understand how the climate is projected to change locally within the city, future climate hazards and likely associated risks. It identifies 104 climate change risks to the Council as well as some benefits and opportunities (for example, opportunities for active travel from increased temperature). A more in-depth summary is included above in the summary of Evidence for NPF4 Policy 1.

Dundee Local Area Energy Plan [DED087](#)

2.58 The Dundee Local Area Energy Plan, developed in collaboration with SSEN through the RESOP Project, outlines modelled potential scenarios to support the city's transition to net zero. This is a dynamic document that will evolve in response to various factors affecting Dundee's technological capacity and climate targets. Scottish and Southern Electricity Networks and National Energy System Operator are actively mapping current grid capacity and forecasting future energy demand. Planned grid enhancements will influence the city's ability to deploy technologies such as photovoltaic (PV) systems. The plan acknowledges that target figures may shift as further analysis is conducted and aligns with current government strategies and objectives. A more in-depth summary is included above in the summary of Evidence for NPF4 Policy 1.

Scottish Water Climate Adaptation Plan 2024 [DED273](#)

2.59 This sets out Scottish Water's climate adaptation priorities for the short and long term and why we need to improve our asset base due to water resource challenges, droughts and increased flood risk. Within Dundee (and the wider Tayside region) consumer habits of water consumption have to shift towards using, and wasting, less water. In addition, the Scottish Water Climate Adaptation Plan highlights the joint working partnership underway between Scottish Water and Dundee City Council to

improve communities at a local level through increasing Blue-Green infrastructure, which will help alleviate increasing flood risk.

Natural Capital Baseline Assessment ([DED206](#))

2.60 A baseline assessment was carried out in March 2023 of the following Ecosystem services:

- Carbon storage & sequestration
- Soil erosion prevention
- Flood risk reduction
- Important areas for pollinators
- Important biodiversity habitats and connectivity for woodlands
- Enhanced biodiversity metric for Scotland

2.61 This report calculated the natural capital assets and ecosystem service flows within the council area and is a starting point to future adaptation planning. It will be repeated in 2026 to monitor the effectiveness of interventions.

Policy 10 – Coastal Development

National Planning Framework 4 (NPF4) [DED201](#)

2.62 Policy 10 Coastal Development aims to protect coastal communities and assets and support resilience to the impacts of climate change.

2.63 The policy outlines that LDP spatial strategies should consider how to adapt coastlines to the impacts of climate change. This should recognise that rising sea levels and more extreme weather events resulting from climate change will potentially have a significant impact on coastal and islands areas and take a precautionary approach to flood risk including by inundation. Spatial strategies should reflect the diversity of coastal areas and opportunities to use nature-based solutions to improve the resilience of coastal communities and assets. LDP spatial strategies should identify areas of developed and undeveloped coast and should align with national, sectoral and regional marine plans.

Dundee Local Development Plan 2019 [DED088](#)

2.64 LDP Policy 36: Flood Risk Management states that:

2.65 Medium to High Risk Areas: There is a general presumption against

- a. development on previously undeveloped land and
- b. development of essential civil infrastructure, in high risk areas based on a 0.5% or greater annual probability of flooding (equivalent to a 1 in 200 year flood or greater) plus an additional allowance of 600mm. Other development may be acceptable where:
 1. sufficient flood defences already exist, or a Flood Protection Scheme or flood defence, designed and constructed to a standard of 0.5% annual probability plus climate change allowance, will be in place prior to occupation of the proposed development;
 2. those flood defences will be maintained for the lifetime of the development and will not increase the probability of flooding elsewhere;
 3. the extent of development potentially affected by flooding is protected through the use of appropriate water resistant materials and construction; and
 4. the finalised scheme does not result in a land use which is more vulnerable to flooding. A flood risk assessment will be required for any development within the medium to high risk category.

2.66 Low to Medium Risk Areas: Areas with a 1 in 1000 to 1 in 200 year annual probability of flooding will be suitable for most development. A flood risk assessment may be required at the upper end of the probability range or where the nature of the development or local circumstances indicates heightened risk. These areas are generally not suitable for essential civil infrastructure. Where such infrastructure

must be located in these areas, it should be capable of remaining operational and accessible during extreme flooding events.

Coastal Change Adaptation Guidance [DED034](#)

2.67 There are two main parts to the guidance. Part One sets out the context, wider policy links and an introduction to Coastal Change Adaptation. Part Two is the suggested process to draft a Coastal Change Adaption Plan.

2.68 Over the last thirty years sea level across Scotland has risen between two and three times faster than over the previous 100 years. Mean sea level is anticipated to rise by between 0.30-1.16 m by 2100 (according to a high emissions scenario relative to a baseline period of 1981-2010). However, this does not include Antarctic ice sheet collapse with some estimates exceeding 2.5 m by 2100 for high emissions scenarios. Despite the uncertainties, sea level is projected to rise under all future emissions scenarios by 2100.

2.69 Of specific relevance to Dundee Part Two (Action Plans) states that local authorities will have flexibility in how the Action Plans are costed and developed. For example, coastal erosion is not anticipated for Dundee city waterfront so the policy choice could be Hold the Existing Line (HTEL) with foreseeable adaptations required related to managing increasing flood risk.

River Basin Management Plan for Scotland 2021-2027 [DED249](#)

2.70 River basin management planning (RBMP) protects and improves Scotland's water environment for the benefit of people, wildlife and the economy.

2.71 Much of the water environment in Scotland is in good condition. However, there are still significant problems affecting water quality, physical condition, water resources, and the migration of wild fish.

2.72 The River Basin Management Plans for Scotland set out a range of actions to address these impacts. They are produced by SEPA on behalf of Scottish Government. They cover actions for public bodies, industry and land managers in Scotland. They summarise:

- the state of the water environment;
- pressures affecting the quality of the water environment where it is in less than good condition;
- actions to protect and improve the water environment;
- a summary of outcomes following implementation.



Figure 2.5 – Overall condition of surface waters in 2020

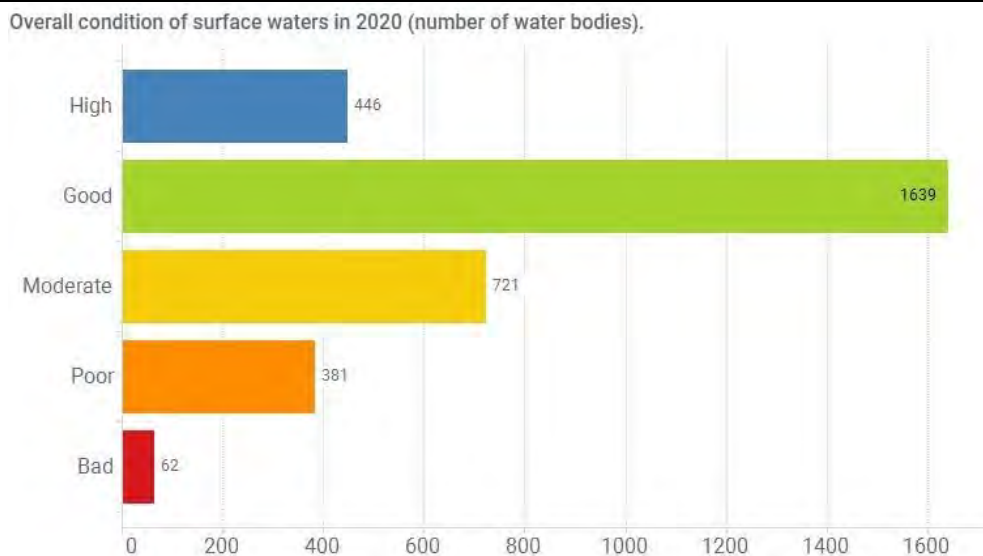


Table 1 Figure 2.6 - Overall Condition of Surface Waters in 2020 (Number of Water Bodies)

Image reference: [RBMP3 \(sepa.org.uk\)](https://sepa.org.uk)

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2.73 Above are the watercourses, within closest proximity to Dundee:

- Invergowrie Burn is a river (ID: 6405) in the Dundee Coastal catchment of the Scotland river basin district. The Invergowrie Burn is noted as having a good overall condition.
- Dighty Water is a river (ID: 6001) in the Dighty Water catchment of the Scotland river basin district. The Dighty Water is noted as having a moderate overall condition.



Figure 2.6 – Surface waters affected by pressures from all themes in 2020

Invergowrie Burn

Current condition and future objectives

	Current	2027	Long Term
Overall	Good ecological...	Good ecological...	Good ecological p...
Water quality	Good	Good	Good
Water flows and levels	Good	Good	Good
Physical condition	Good ecological...	Good ecological...	Good ecological p...
Access for fish migration	High	High	High
Freedom from invasive species	High	High	High

Table 2 Figure 2.7 - Current Condition and Future Objectives (Invergowrie Burn)

Dighty Water

Current condition and future objectives

	Current	2027	Long Term
Overall	Moderate ecolog...	Poor ecological ...	Moderate ecologi...
Water quality	Moderate	Moderate	Good
Water flows and levels	Good	Good	Good
Physical condition	Moderate ecolog...	Good ecological...	Good ecological p...
Access for fish migration	High	High	High
Freedom from invasive species	Moderate	Moderate	Moderate

Table 3 Figure 2.8 - Current Condition and Future Objectives (Dighty Water)

Image reference: [RBMP3\(sepa.org.uk\)](https://sepa.org.uk)

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2.74 Above are the watercourses, within closest proximity to Dundee that are affected by pressures. The tables above outline the current condition (2020), expected condition in 2027 and the longer term expected condition. For the Invergowrie Burn this remains stable with no anticipated change in the condition of the watercourse. For the Dighty Water, there is change anticipated in 2027 to the overall condition, but this is expected to return to the current (2020) condition in the longer term. This should be read in conjunction with the action proposed to the Dighty Water as outlined in the maps below. This is also relevant for water quality and physical condition which are both anticipated to improve.

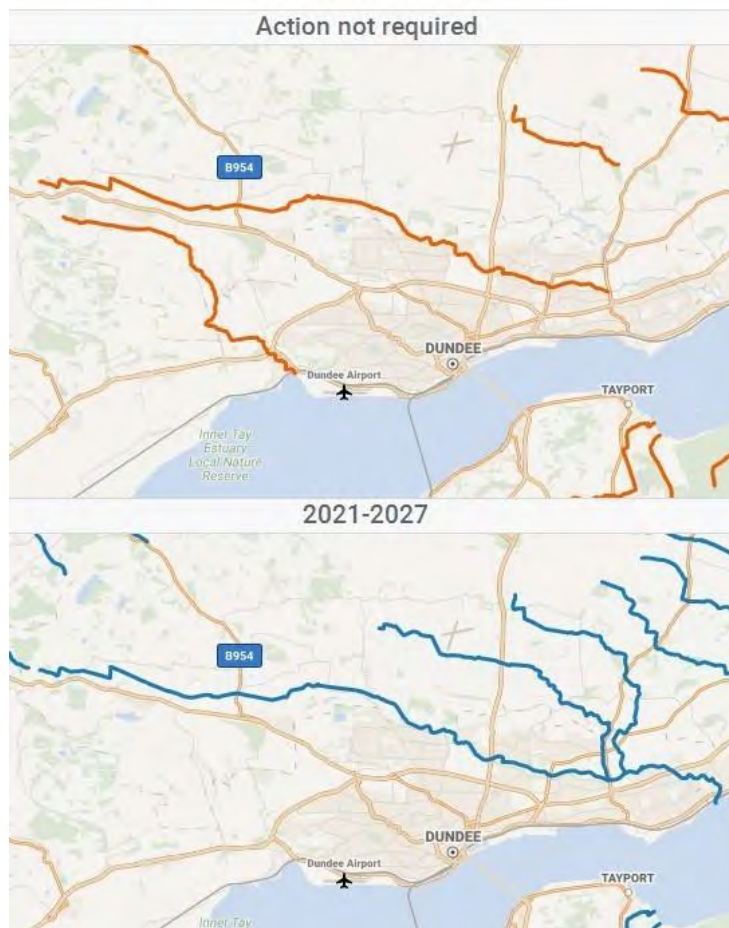


Figure 2.9 – Where action is not required and action is planned to address surface water pressures from all themes

Image reference: [RBMP3 \(sepa.org.uk\)](https://sepa.org.uk)

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- 2.75 There is action noted for the Dighty Water including modifications to the physical condition (rural) of the watercourse and modifications to the physical condition (urban). There is also action planned on rural diffuse pollution and water quality.
- 2.76 Water Environment data: The classification data referred to in the paper is for 2020 as this was the data available at the time of publication of the River Basin Management Plan for Scotland 2021-2027. However, Dundee City Council are aware that the most recent water environment classification data now available is for 2023 and can be accessed from the Water Classification Hub (sepa.org.uk). This will be referred to, and cross-referenced, as work on the Local Development Plan progresses.

Tay Estuary Forum Management Plan [DED354](#)

- 2.77 The Forum region extends from the tidal limit of the Firth of Tay at Scone, to Fife Ness and to the River North Esk on the open coastline; it extends to a distance of at least 5 km offshore. The area is governed by four local authorities (Angus, Dundee, Fife and Perth & Kinross), and encompasses a diverse range of environments, including three estuaries: the Tay, Eden and Montrose Basin.
- 2.78 The region is rich in biodiversity with nationally and internationally important designated species and habitats. Home to over half a million people, there are inevitable pressures along this stretch of coast where the interactions between people, their environment and economic demands are constantly evolving.
- 2.79 This work is quite dated now but remains relevant for Dundee and the wider region read alongside other more up to date plans, strategies and projects.

National Marine Plan [DED256](#)

- 2.80 This Plan covers both Scottish inshore waters (out to 12 nautical miles) and offshore waters (12 to 200 nautical miles).
- 2.81 This National Marine Plan sets out strategic policies for the sustainable development of Scotland's marine resources out to 200 nautical miles. It is required to be compatible with the UK Marine Policy Statement and existing marine plans across the UK, in particular where there is interaction between England inshore and offshore marine plans and Northern Ireland Marine Plans
- 2.82 As set out in the National Marine Plan and of specific note for Dundee:
- 2.83 *Oil and gas*: The location of Scottish ports in relation to oil and gas reserves in the North Sea means they have strategic importance in handling products as well as servicing of industry boats and infrastructure and general support of the industry. Sullom Voe, Flotta, Grangemouth, Aberdeen and Dundee are of particular importance.

Guide to Climate Change Impacts [DED140](#)

- 2.84 This Historic Environment Scotland strategy sets out many of the risks and hazards of climate change that are facing Scotland's historic environment and offers routes to take action, to implement adaptation measures and enhance resilience to climate change. The guide has a specific section that considers the impacts and adaptation for the coastal historic environment.

SEPA Guidance on Climate change allowances for flood risk assessment in land use planning [DED029](#)

- 2.85 This guidance provides regional uplift values for Scotland, indicating how much peak rainfall, river flows and sea levels are expected to rise. Sea level rise allowances (0.85m for the Tay River Basin Region) included in this guidance should be used to calculate areas at risk of flooding in site specific assessments. This guidance will be updated as evidence on climate science evolves.

Data

- 2.86 *Scottish Coastal Observatory Data [DED260](#)* - This data set comprises the monitoring data collected as part of the Scottish Coastal Observatory. Some of this data is quite dated but a baseline which other more up to date plans and strategies are relevant.
- 2.87 *SEPA coastal flood maps [DED035](#)* – SEPA's flood maps are designed to help understand how places could be affected by flooding. The maps show areas which are likely to flood from rivers, the sea and surface water. The flood maps are a public tool and used by a wide variety of people for a range of work. As per NPF4, 'at risk of flooding' means there is an 'annual probability of being flooded of greater than 0.5% which must include and appropriate allowance for future climate change'. This risk is indicated on SEPA's Future Flood Maps.
- 2.88 *Marine Scotland data portal [DED193](#)* - Marine Scotland Data Publication is a platform for publishing datasets with associated digital object identifiers (DOI's). This allows users to reference data appropriately, and for researchers to gain recognition for publishing data.
- 2.89 *Dynamic Coast [DED108](#)* - This research project aims to provide the strategic evidence base on the extent of coastal erosion in Scotland and improve awareness of coastal change. The Future Erosion data shows anticipated erosion areas for a High Emissions, 'do nothing' scenario by 2050 and 2100. There are visible areas in Dundee, particularly along the Broughty Ferry esplanade, which is likely to be a significant future challenge, and may increase the risk of flooding.

Policy 11 - Energy

National Planning Framework 4 (NPF4) [DED201](#)

- 2.90 This policy aims to encourage, promote and facilitate renewable energy development onshore and offshore. It states that "LDPs should seek to realise their area's full potential for electricity and heat from renewable, low carbon and zero emission sources by identifying a range of opportunities for energy development". The policy offers strong support for proposals that:
- Maximize renewable energy generation and reduce emissions,

- Deliver economic benefits to local communities,
- Minimize negative impacts on people, landscapes, and the environment,
- Enable works, such as grid transmission and distribution infrastructure.

2.91 Project designs must consider and mitigate potential issues like noise, visual impact, and ecological disruption.

Dundee Local Development Plan 2019 [DED088](#)

2.92 Policy 45, Energy Generating Facilities: This policy outlines where large and small-scale energy generating facilities can be built in Dundee. Large facilities must be located in designated employment areas to minimize impact. They should also use technology to reduce emissions and may require air quality assessments. Small scale facilities outside industrial zones are only supported if they produce heat or power locally. Development may be acceptable where set criteria are met. These include minimal noise, odour, and visual impact, along with best available technology for pollution control.

2.93 Policy 47, Wind Turbines: Dundee is unable to accommodate large scale wind farms due to proximity to residential and urban areas. Small scale proposals involving the production of energy by wind turbines will be supported provided there would be no unacceptable negative effects in relation to biodiversity, landscape and visual impacts, carbon rich soils, effects on the quality of the water environment.

2.94 Policy 48, Low and Zero Carbon Technology in New Development: This policy aims to reduce greenhouse gas emissions from buildings, a major contributor in Scotland.

2.95 New buildings must incorporate low-carbon technologies like solar panels or heat pumps to meet the carbon emissions reduction standard set by Scottish Building Standards.

2.96 Exceptions include alterations and extensions to buildings, change of use or conversion of buildings, ancillary buildings that stand alone and cover an area less than 50 square metres, and those which will not be heated or cooled, other than by heating provided solely for frost protection.

2.97 Applicants are required to submit a statement demonstrating compliance with this policy when applying for planning permission.

Dundee Climate Action Plan (2019) [DED073](#)

2.98 One of the four key themes of this plan is to reduce the consumption of energy, promote energy efficiency and increase the proportion of power and heat from low and zero carbon technologies. In Dundee, according to the 2015 MEI, less than 1% of our locally generated electricity comes from renewable sources. There is therefore great potential to increase the percentage of local electricity generation from renewable sources in Dundee to make a significant reduction in emissions.

2.99 The Climate Action Plan was developed with the principles of the energy hierarchy, where the approach seeks to reduce the amount of energy used in the first place, before employing technologies to reduce energy, as shown below.

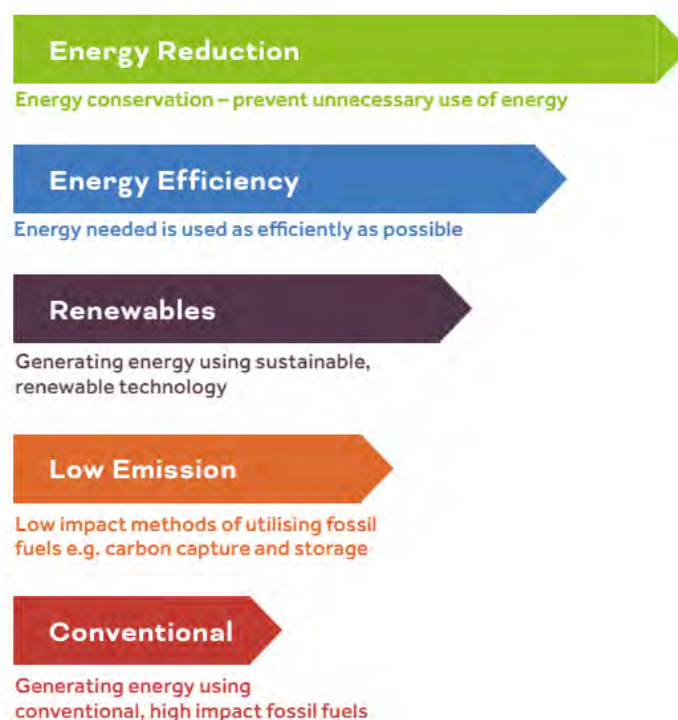


Figure 2.10 – Technologies to reduce energy
Image reference: Dundee Climate Action Plan - [climateactionplan.pdf](#)

Draft Energy and Just Transition Plan [DED060](#)

2.100 This plan sets out the Scottish Government's route map of actions towards delivering a flourishing net zero energy system that supplies affordable, resilient and clean energy to Scotland's workers, households, communities and businesses. Key ambitions for Scotland's energy future include:

- More than 20 GW of additional renewable electricity on- and offshore by 2030.
- An ambition for hydrogen to provide 5 GW or the equivalent of 15% of Scotland's current energy needs by 2030 and 25 GW of hydrogen production capacity by 2045.
- Increased contributions from solar, hydro and marine energy to our energy mix.
- Accelerated decarbonisation of domestic industry, transport and heat.

Hydrogen Action Plan [DED162](#)

2.101 The Scottish Government's proposed actions to support the development of a hydrogen economy are set out in this plan. Dundee is identified as a potential regional hydrogen hub due to being ideally located next to several offshore wind farms. Michelin Innovation Parc (MSIP) is a key site, focused on driving innovation and research and development in sustainable mobility and low-carbon energy and offering a wide range of industrial spaces.

Onshore Wind Policy Statement 2022 [DED219](#)

2.102 This statement sets an overall ambition of 20 GW of installed onshore wind capacity in Scotland by 2030. The policy focuses on deploying wind turbines in designated areas to minimize impact on communities and the environment.

2.103 Developers are encouraged to involve communities and offer them ownership opportunities in new wind projects. The policy emphasizes using best practices to minimize noise, visual impact, and other potential negative effects of wind farms.

Dundee Local Area Energy Plan [DED087](#)

2.104 The Dundee Local Area Energy Plan, developed in collaboration with SSEN through the RESOP Project, outlines modelled potential scenarios to support the city's transition to net zero. This is a dynamic document that will evolve in response to various factors affecting Dundee's technological capacity and climate targets. Scottish and Southern Electricity Networks and National Energy System Operator are actively mapping current grid capacity and forecasting future energy demand. Planned grid enhancements will influence the city's ability to deploy technologies such as photovoltaic (PV) systems. The plan acknowledges that target figures may shift as further analysis is conducted and aligns with current government strategies and objectives. A more in-depth summary is included above in the summary of Evidence for NPF4 Policy 1.

Port of Dundee Infrastructure Masterplan [DED233](#)

2.105 Forth Ports Dundee lies on the north side of the River Tay estuary and serves the North Sea sector, encompassing the transition to low carbon energy sources. Current and ongoing Dundee Port Renewables Sector Wind Farm Projects work areas include:

- Wind Turbine Construction
- Jacket Logistics
- Subsea Foundation or Moorings
- Subsea Transmission Cables
- Commissioning/Operations & Maintenance

National Marine Plan and Review [DED256](#)

2.106 The National Marine Plan for Scotland, adopted in March 2015, sets out strategic policies for the sustainable development of marine resources. The plan provides a framework for managing all developments, activities, and interests in or affecting Scotland's marine area. Dundee port is recognised as a National Renewables Infrastructure Plan site due to being a key location to meet offshore renewable industry needs i.e. construction/installation, manufacturing and inspection, repair and maintenance.

2.107 The NMP is currently being updated. A key reason to update is the need to have more of a focus in marine planning on addressing the twin crises of climate change and biodiversity loss. Scottish Government's Marine Directorate are leading the process for the development of NMP2, starting in 2023 and taking several years.

Sectoral marine plan: regional locational guidance [DED275](#)

2.108 This sets out regional spatial baseline data for the sectoral marine plan for offshore wind energy and describes the information used in the planning and assessment process. The Port of Dundee's strategic position within the East Region means that it plays a significant role in supporting renewable energy through manufacturing and maintenance.

Pathway to 2030: A Holistic Network Design for Offshore Wind- ESO

Beyond 2030- ESO [DED115](#)

2.109 The National Grid ESO (Electric System Operator) strategies leading up to 2030 and beyond are important in setting the broader aims/targets for aiding the transition to Net Zero. These papers refer to the wider UK context rather than Dundee specifically but set out the bigger picture on large strategic electricity network developments, which will be largely influenced by the increase in renewable energy generation from offshore wind development driven by on-going Scot Wind seabed leasing rounds.

2.110 This work refers to upgrades and reinforcement to the Transmission part of the electricity network and SSEN Transmission will be responsible for delivering these upgrades and reinforcements.

SSEN Network Visibility Strategy [DED213](#)

2.111 This strategy sets out how SSEN Distribution envisage their involvement in upgrading and modernizing the electricity distribution network to achieve reductions in carbon emissions across operations and enhance reliability and resilience against extreme weather events and other challenges.

The primary focus is on advanced grid technologies, including smart grid systems and automation as well as facilitating the integration of more renewable energy sources into the grid.

Distribution Future Energy Scenarios 2023 (North of Scotland) [DED059](#)

2.112 The Distribution Future Energy Scenarios (North of Scotland) is a strategic framework developed by Scottish and Southern Electricity Networks (SSEN) to explore and plan for potential future energy demands and supply scenarios in the North of Scotland. This framework aims to understand and anticipate the evolving energy landscape over the coming decades, driven by technological advancements, policy changes, and the transition to low-carbon energy sources. It includes Dundee-specific data and modelling on energy from waste, battery storage sites and EV uptake.

Data

Marine Scotland data ([DED192](#))

2.113 Marine Scotland Maps is a portal to provide spatial information and data to support national and regional marine planning. One key dataset is an assessment of Scottish blue carbon. Blue carbon habitats such as saltmarsh, sand dunes and seagrass have been threatened by coastal energy development and competing land use.

National Grid ESO's interactive map [DED199](#)

2.114 This map features the Electricity System Operators' view of future transmission requirements and the capability of Great Britain's National Electricity Transmission System over the next 10 years. It also includes recommendations for which reinforcement projects should receive investment.

SSEN Distribution Data Portal [DED058](#)

2.115 This portal allows access to electricity network datasets including the NeRDA Opengrid dashboard which aims to examine how near real-time energy demand and usage can be best used by stakeholders.

SSEN Local Energy Net Zero Accelerator (LENZA) tool [DED181](#)

2.116 SSEN and Advanced Infrastructure have developed a net zero planning tool which allows stakeholders including Dundee City Council access to up-to-date network capacity, building stock data and modelling tools to support informed decision making. This tool has been used in the development of the Council's Local Heat and Energy Efficiency Strategy and Local Area Energy Planning.

SSEN Transmission Assets within local authority boundary (internal Geographic Information Systems (GIS) layer) [DED293](#)

2.117 This internal GIS layer assists planning officers with identifying planning applications that fall within the notification corridor around SSEN Transmission's assets e.g. overhead and underground electricity lines. If an application falls within the polygon, SSEN Transmission are consulted.

SSEN Transmission Open Data Portal [DED294](#)

2.118 This portal includes datasets and maps setting out the location and characteristics of SSEN Transmission's infrastructure assets including substation sites, grid towers, and overhead lines.

Scottish Energy Statistics Hub [DED321](#)

2.119 This provides interactive charts, commentary and downloadable data related to energy in Scotland. Themes include electricity and gas systems, oil and gas, energy efficiency and renewables and low carbon.

Stannergate 132kV Substation and Network Rail Feeder Station [DED329](#)

2.120 Proposing to replace and upgrade Dundee's high voltage electricity network to ensure reliable power for the future.

Policy 12 – Zero Waste

National Planning Framework 4 (NPF4) [DED201](#)

2.121 Policy 12 Zero Waste: aims to encourage, promote and facilitate development that is consistent with the waste hierarchy. The policy outlines that LDPs should identify appropriate locations for new waste management infrastructure to support the circular economy and meet identified needs in a way that moves waste as high up the waste hierarchy as possible.

Dundee Local Development Plan 2019 [DED088](#)

2.122 *LDP Policy 43: Waste Management Installations* states that: Existing waste management installations are safeguarded unless evidence is presented to demonstrate that the facility is no longer required and that the capacity can be met through an alternative facility. New waste management installations should be located in the first instance in General Economic Development Areas identified in the Proposals Map unless the Council is satisfied that proposals are consistent with a strategy or programme approved by the Council or serve a strategic need for the management of waste.

2.123 Development which meets the above requirement may be permitted provided:

1. there is no detrimental impact on neighbouring uses or local residential amenity;
2. there is no unacceptable traffic impact;
3. it does not have an adverse effect, either alone or in combination with other proposals or projects, on the integrity of any Natura site.; and
4. suitable standards of restoration following decommissioning are proposed and agreed by the Council.

2.124 *LDP Policy 44: Waste Management Requirements for Development* states that: Development proposals should demonstrate that they adequately address the Scottish Government's Zero Waste Policy and that sufficient provisions are made to maximise opportunities for waste reduction and waste separation at source and enable the separate collection of recyclable material as outlined in the Waste (Scotland) Regulations 2012. Site waste management plans are required for major developments to ensure sufficient control for site waste during construction and operation of new development.

Scotland's Circular Economy and Waste Route Map to 2030 Consultation [DED258](#)

2.125 The route map sets out strategic direction for delivering our system-wide, comprehensive vision Scotland's circular economy from now to 2030. Building on a first consultation (2022), the Route Map consults on key priority actions that will unlock progress across the waste hierarchy.

2.126 A circular economy, based on sustainable consumption and production, is reported to be essential to power Scotland's transition to a fair, green and sustainable economy, and critical to meeting our obligations to tackle the twin climate and nature emergencies.

2.127 Material consumption and waste are primary drivers of nearly every environmental problem Scotland currently faces, from water scarcity to habitat and species loss. Around four-fifths of Scotland's carbon footprint comes from the products and services we manufacture, use and throw away and 90% of global biodiversity loss and water stress is caused by extraction and processing of these products.

2.128 The Scottish Government is committed to delivering a different approach to our economy, one where we move from a "take, make and dispose" model to one where we value materials and keep them in use.

2.129 Measures in the Route Map are grouped under four strategic aims, which reflect the span of the waste hierarchy:

1. *Reduce and reuse* - Reducing and reusing waste are the first goals of the waste hierarchy and central to changing our relationship with materials and products. Building an economic system that moves away from being based on items that are designed to be disposable will bring significant environmental benefits.

2. *Modernise recycling* - Recycling helps to conserve our natural resources, keep valuable materials flowing through our economy and reduce the amount of waste sent to landfill. The Route Map notes that Scotland is to become a world-leader in recycling, where recycling and reuse services are easy to use and accessible to all, and support and encourage positive choices. By 2030, we want a high-performing recycling system that has modernised recycling services for households and businesses across Scotland, optimised the performance of collection services, and can recycle most waste types to maximise diversion of waste from disposal. Increasing the amount of materials recycled and increasing the proportion of these recycled in Scotland will deliver carbon reductions, reduce the environmental impacts associated with extracting new raw materials, and create a 10 range of important economic opportunities to reprocess and reuse materials here in Scotland.
3. *Decarbonise disposal* - The production and management of waste results in environmental impacts and represents missed economic opportunities for these materials. That is why the focus in the Route Map is to prevent materials from becoming waste in the first place. As the move to a circular economy is accelerated, less waste will be produced. It is important to ensure that materials that cannot be avoided, reused or recycled are managed in 11 a way that minimises environmental and climate impacts, encourages management of materials further up the waste hierarchy, and minimises broader societal impacts.
4. *Strengthen the circular economy* - Delivering a circular economy is not a simple task. It requires sustained transformational system change, and a range of actions that are both complementary and coordinated to drive sustainable management of our resources. If Team Scotland are to maximise the opportunities that a circular economy brings to Scotland, a strategic approach to its delivery must be maintained, ensuring the right structures and support are in place to enable action across the circular economy.

Waste and Recycling Strategy & Action Plan [DED072](#)

- 2.130 This strategy seeks to consolidate the work already undertaken to further improve sustainable waste management within Dundee to ultimately meet the aspiration of an entirely waste free Dundee. Actions have been identified to achieve this overall aim. This will increase Dundee's recycling rate, influence widespread behavioural change and foster a greater sense of civic pride amongst residents, visitors and businesses.
- 2.131 In order to affect any significant change in Dundee's overall recycling performance, a step change in the behaviour of service users is required.
- 2.132 Whilst many Dundee citizens are committed recyclers, others have not yet made the shift away from their reliance on the general waste bin to dispose of all wastes indiscriminately. In common with other city authorities, this is a particular issue in flatted property areas with communal bins in central locations due to lack of ownership and reduced efforts to recycle.

Policy 19 – Heating and Cooling

National Planning Framework 4 (NPF4) [DED201](#)

- 2.133 Policy 19 Heating and Cooling aims to encourage, promote and facilitate development that supports decarbonised solutions to heat and cooling demand and ensure adaptation to more extreme temperatures.
- 2.134 The policy outlines that LDPs should take into account the area's Local Heat & Energy Efficiency Strategy (LHEES). The spatial strategy should take into account areas of heat network potential and any designated Heat Network Zones (HNZ).

Dundee Local Development Plan 2019 [DED088](#)

- 2.135 Policy 46: Delivery of Heat Networks: Proposals for new development should meet their heat demand through heat networks, by considering the feasibility to create or link into an existing energy centre and heat network or demonstrate the capability to progress towards this technology in the future.

A statement will be required to be submitted with an application for planning permission to demonstrate that consideration has been given to the viability of creating or linking into a heat network.

2.136 This requirement applies to the following development:

- a. Proposals that are subject to a Major planning application, or would cumulatively exceed the Major planning application thresholds; or
- b. Proposals for housing or commercial development in locations where Scotland's Heat Map or the City's heat network strategies indicate that they are close to a significant heat supply source or a planned heat network.

2.137 In both cases the development layout should be designed to be capable of connecting to the heat network or heat source and areas for pipe runs within the development should be safeguarded to enable future connectivity.

Heat in Buildings Strategy 2021 [DED148](#)

2.138 This sets out the Scottish Government's vision for the future of heat in buildings, and the actions being taken in the buildings sector to deliver climate change commitments, maximise economic opportunities, and ensure a just transition, including helping address fuel poverty. The approach and timeline for Local Heat and Energy Efficiency Strategies is also set out in this document.

Dundee City Council Heat Network Statement Planning Guidance 2020 [DED149](#)

2.139 This guidance is used to assist developers/agents on what is required to comply with Dundee Local Development Plan Policy 46: Delivery of Heat Networks with regards to the submission of a statement with their planning applications.

2.140 The type of development and where it is located within the City determines the action required. In the first instance developers should check Scotland's heat map and Dundee's District Heating Strategy to identify if there are any heat centres, identified heat demand or opportunities that may be appropriate to the development. If it is considered that there is an opportunity to create or link to a heat network as part of the development, early discussion with the Council is required to establish how this could be implemented. Where the creation of or link to a heat network is not considered viable, evidence of why this would be case is required e.g. evidence from heat mapping, heating strategy etc. Where a heat network is considered unviable developers are required to demonstrate how the development could be future proofed to enable future connection and choice for the end user.

DCC District Heating Strategy 2018-2028 [DED079](#)

2.141 This document aims to identify potential district heating networks in Dundee, including the short, medium and long-term strategic opportunities and the development of a long term vision to support the City's growth and low carbon transition using decentralised energy.

2.142 District heating systems use a network of pipes to deliver heat from a place where heat is generated to multiple customers where heat is used.

2.143 The heat is typically in the form of hot water and is transported through a network of pre-insulated underground pipes. The heat may be generated in an energy centre using any of a range of technologies (e.g. surplus heat recovered from an energy from waste facility or other industrial plant, water source heat pump, gas combined heat and power (CHP), solar thermal, etc.), and could change over time as lower carbon/ renewable heat sources emerge.

2.144 Buildings are connected to the heat network through a substation where the heat used is metered. Buildings may have an associated energy centre which at times provides heat to the building, but at other times feeds heat into the wider district heating network. As the district heating network expands, higher levels of efficiency and resilience are achieved through the incorporation of multiple heat sources supplying multiple and varying demands.

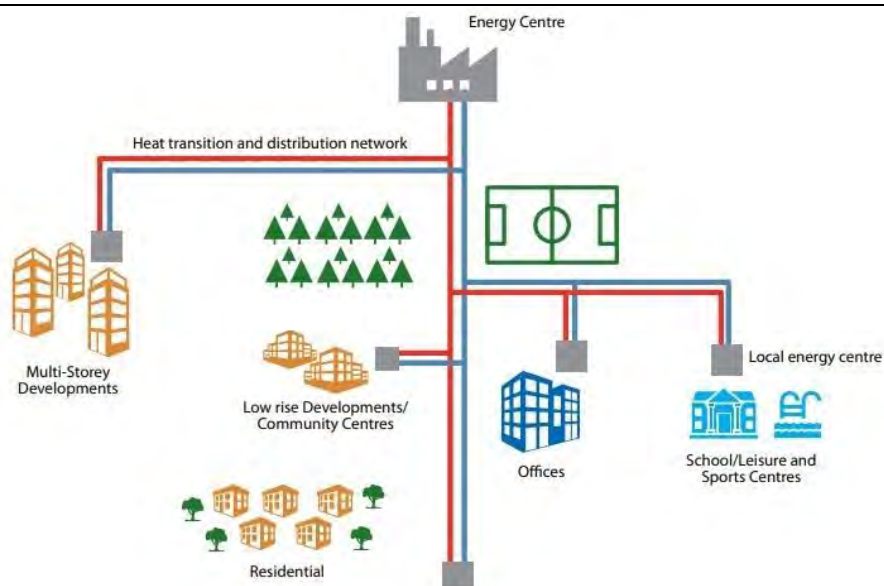


Figure 2.11 – Diagram of a district heating network

Image reference: <https://www.dundee.gov.uk/sites/default/files/publications/districtheating.pdf>

- 2.145 District heating systems usually offer benefits deriving from economies of scale.
- 2.146 Tackling fuel poverty, reducing CO2 emissions and decentralising energy are key issues for the city as identified in the City Plan, the Council Plan and the Capital Investment Strategy. The District Heating Strategy has therefore been brought forward to deliver these commitments and aims to provide another step forward in the Council's long standing aspiration for the city framed around jobs, social inclusion and quality of life.
- 2.147 The District Heating Strategy follows the Scottish Government's Heat hierarchy of:
1. Reducing the need for heat
 2. Supply heat efficiently and at least cost to consumers
 3. Use renewable and low carbon heat resources

Dundee Local Heat and Energy Efficiency Strategy (February 2024) [DED089](#)

- 2.148 The requirement for a Local Heat and Energy Efficiency Strategy was introduced by the Scottish Government to drive forward heat decarbonisation and better energy efficiency in buildings.
- 2.149 Dundee's Local Heat and Energy Efficiency Strategy (LHEES) is an important strategic plan for the city. It highlights key steps for reducing heating related carbon emissions, enhancing building energy efficiency, and addressing fuel poverty. It will help to tackle the city's climate emergency and meet its net zero target whilst also improving the thermal comfort and health and wellbeing of residents and offering the potential for new economic opportunities in the city.
- 2.150 The Delivery Plan is to be published separately and will detail how the Council plans to implement the key actions in the Strategy.
- 2.151 LHEES has two core functions and six scopes, referred to as considerations in the guidance.

Core Function	Considerations	Description
Heat Decarbonisation	Off-gas buildings	Transitioning away from oil and LPG in off-gas properties.
	On-gas buildings	Transitioning away from natural gas in on-gas properties.
	Heat networks	Identifying potential heat networks for decarbonisation of heat.
Energy Efficiency Improvement	Poor building energy efficiency	Identifying possible locations at a strategic and delivery level where poor building energy efficiency exists across the Local Authority area. Target measures to improve the energy efficiency.
	Poor building energy efficiency as a driver for fuel poverty	Identifying possible locations at a strategic and delivery level where poor building energy efficiency acts as main driver for fuel poverty. Target measures to remove poor energy efficiency as the cause of fuel poverty.
	Mixed-tenure, mixed-use and historic buildings	Identifying buildings of mixed-tenure or mixed-use, historic buildings, listed buildings, and conservation areas. Target measures to improve energy efficiency and decarbonise heating for these buildings.

Figure 2.12 – What is the LHEES aiming to do?

Image reference: https://www.dundee.gov.uk/sites/default/files/lhees_strategy.pdf

Key considerations from LHEES:

- 12% of properties are off-gas in Dundee. The LHEES focuses on initiatives to target these properties with energy efficiency improvements.
- 87% of domestic properties are connected to the mains gas supply, suggesting a huge challenge in transitioning away from natural gas.
- The LHEES analysis has built on the Scottish Government National Assessment work to identify 23 Potential Zones using the Baseline criteria, with a total heat demand of 767 GWh/year (about 48% of total heat demand in Dundee).
- Ten Potential Zones were then identified using the Stringent criteria in Dundee, with a total heat demand from all properties within the zone of 538 GWh/year (about 34% of total heat demand in Dundee).
- After additional analysis, five Potential Zones were selected for closer analysis, in line with section 48 of the Heat Network (Scotland) Act 43. These zones have been identified as strategically important for heat network development in Dundee and are classed as 'Priority Zones'. They are given the highest priority and incorporate additional contextual factors such as fuel poverty, existing heat networks, feasibility studies, and decarbonisation plans.
- The properties in the five Priority Zones use a **total of 554 GWh/year of heat (35% of total demand in Dundee)**. Key factors that influenced which zones were chosen were LDP housing allocations, Scottish Water sewer pipes, Council owned properties, and existing heat networks:
 - HN1 1 – City Centre
 - HN2 2 – Baldovie
 - HN3 3 – Ninewells
 - HN4 4 – Caird Park
 - HN5 5 – Lochee
- 47% of domestic properties in Dundee are rated EPC D-G, which is lower than the national average (51%).

- The average probability of a household being in fuel poverty and extreme fuel poverty is 31% and 21%, respectively. This is higher than the Scottish average.
- Around half of Dundee's domestic properties are situated within multi-dwelling buildings. Of these properties, approximately 70% are contained in buildings with more than one type of tenure (owned, rented, etc).

Gas Boilers

2.152 Dundee's gas network is operated and maintained by Scotland Gas Networks (SGN). The future of Dundee's gas network is currently uncertain. As of 1st April 2024, the Scottish Government's New Heating Standards legislation prohibits the installation of new domestic and commercial properties which require a building warrant ([DED372](#)). Instead of gas boilers, commercial and new build (including conversions) are required to install alternative heating systems that do not use direct emission fuels, such as heat pumps.

2.153 Due to decarbonisation and given the restrictions of gas heating systems in all new development, it is unlikely to be a significant concern for planning within Dundee City Council. Safeguarding and maintaining existing infrastructure will be required and supported as well as monitoring key developments in sustainable energy sources, including the potential utilisation of existing gas infrastructure for hydrogen.

Dundee Local Area Energy Plan [DED087](#)

2.154 The Dundee Local Area Energy Plan, developed in collaboration with SSEN through the RESOP Project, outlines modelled potential scenarios to support the city's transition to net zero. This is a dynamic document that will evolve in response to various factors affecting Dundee's technological capacity and climate targets. Scottish and Southern Electricity Networks and National Energy System Operator are actively mapping current grid capacity and forecasting future energy demand. Planned grid enhancements will influence the city's ability to deploy technologies such as photovoltaic (PV) systems. The plan acknowledges that target figures may shift as further analysis is conducted and aligns with current government strategies and objectives. A more in-depth summary is included above in the summary of Evidence for NPF4 Policy 1.

Data

Dundee City Council Local Heat and Energy Efficiency Webmap [DED183](#)

2.155 This is a key spatial data source setting out domestic and non-domestic property baselines, areas of heat demand, strategic zones and potential heat network zones. One layer of the map presents Prioritised Zones, those taken forward for prioritisation of heat network development, based on results from heat network zoning analysis, stakeholder engagement and existing knowledge of opportunities in the area. These zones are: City Centre (which includes the University of Dundee Campus and City Quay), Lochee, Caird Park, Ninewells Hospital, and Baldovie.

Scotland Heat Map [DED254](#)

2.156 The Scotland Heat Map is a GIS tool that can be used to identify opportunities to reduce carbon emissions from heat in buildings. The map includes spatial information on aspects such as district/communal heat networks and heat demand confidence.

Summary of Stakeholder Engagement

Stakeholder Working Group

2.157 The below initial stakeholder working group was developed through internal and external individuals with specific interest in the thematic area of Biodiversity, Natural Places, Trees and Soils. The initial stakeholder working group was restricted to internal Dundee City Council representatives and external contacts within Key Agency group topic experts. These topic experts have assisted in developing a robust evidence base for the topic paper grouping.

Internal

- DCC Environment
- DCC Sustainability and Climate Change

External

- NatureScot
- SEPA
- Scottish Water
- Historic Environment Scotland
- SSEN Transmission
- SSEN Distribution

Topic Paper Consultation

2.158 The Climate Change Topic Paper (DER006) was published for consultation between 3 July 2024 to 14 August October 2024 and has formed the basis for the 'Summary of Evidence'. The following table summarises the comments received along with the Dundee City Council (DCC) response.

Post Topic Paper Consultation

2.159 Formal responses to the topic paper consultation were assessed and appropriate changes have been incorporated into the Summary of Evidence. Where consultees disputed any of the submitted evidence, resolution email correspondence was conducted to justify our methodology/ position, or to confirm amendments/ additions in alignment with comments.

Engagement Summary Table

2.160 The following table identifies engagement with stakeholders, from the topic paper consultation period onwards, including summary comments and Dundee City Council's responses. Comments are only provided where contributions from stakeholders led to amendments or additions to the evidence base. Where formal disputes could not be resolved through further engagement they are identified in the table and then further detail is provided within the 'Statements of Agreement / Dispute' section.

Stakeholder	Summary of Comments & DCC Response
NatureScot (STA032)	Suggested further datasets and Topic Paper to strengthen references to the nature crisis, particularly as the climate crisis cannot be addressed without also addressing the nature crisis. DCC Response: Comments incorporated into Schedule 3, verbal confirmation of this at NatureScot/DCC information sharing meeting on 3/12/2024.
Private Individual (STA015)	In agreement with the evidence. DCC Response: Comments noted, no further contact required.
Private Individual (STA027)	In agreement with the evidence.

	DCC Response: Comments noted, no further contact required.
Private Individual (STA040)	In agreement with the evidence. DCC Response: Comments noted, no further contact required.
Historic Environment Scotland (STA004)	In agreement with the evidence. DCC Response: Comments noted
SSEN Transmission (STA029)	Would welcome greater commentary on the electricity transmission infrastructure and a further change to the responsible section of SSEN. DCC Response: Comments incorporated into Schedule 3.
Homes for Scotland (STA047)	HFS state that they do not disagree with the general themes in the Topic Paper. HFS note that Site Selection and Marketability should be key considerations for new developments. HFS believes that the latest national planning and heat policies, effective from April 2024, already exceed the requirements of Section 3F of the Town and Country Planning (Scotland) Act 1997. Therefore, they argue that LDPs should focus on enhancing the energy efficiency of existing buildings rather than setting new ambitions for new builds. HFS expresses concerns about the feasibility and cost of retrofitting developments to connect to future heat networks. They argue that it is unreasonable to require developments to be heat network ready without a clear and realistic timeline for creating these networks. DCC Response: With regards to the comments received that are outwith the scope of the evidence report stage, as the review of the LDP progresses the Council will have a Call for Ideas stage as well as consultation on Proposed Plan which will provide further opportunity for comment. Comments in relation to the site assessment process are noted and will be used to inform the revised draft Site Assessment Methodology.
Hallam Land (STA043)	<i>(Comments the same as HFS above – see comments and response above)</i>
Scottish Water (STA024)	Agree with the evidence and datasets that have been included in the topic paper. Identified two additional evidence sources which set out Scottish Water's climate adaptation priorities for the short and long term and joint working with Dundee City Council to improve blue and green infrastructure for community use, while alleviating flood risk. DCC Response: Comments incorporated into Schedule 3.

	Dundee Civic Trust (STA017)	Dundee Civic Trust note the lack of data on the contribution of solar power and the need for developing this. It is also noted that hydrogen should be carefully considered and how it can be manufactured in Dundee as a genuinely green fuel. DCC Response: Where evidence on solar power and hydrogen is up-to-date and relevant to planning context, this has been included. The summary and link to the Local Area Energy Plan (LAEP) has been updated in the Schedule 3 to reflect progress since its publication.	
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Summary of Implications for the Proposed Plan

Policy 1 - Tackling the climate and nature crises

- 2.161 Climate change and extreme weather events have already impacted many aspects of our natural environment and our society, including buildings and property, health, agriculture, forestry, transport, water resources and energy demand.
- 2.162 Climate change affects a range of social and environmental determinants of health, such as clean air, safe/uncontaminated drinking water, sufficient food and shelter (World Health Organisation). Increased risk of flooding to people, communities and buildings remains among the most severe climate change risks for Scotland.
- 2.163 Climate change may also bring a range of benefits to people. The most common perceived opportunities from climate change in Scotland being that of a more active outdoor lifestyle and exercise, and increased tourism.
- 2.164 In light of the evidence above, below outlines some issues and questions which will be required to be addressed in moving forward towards the Proposed Plan:
- Review the site selection process to ensure that there are criteria and requirements built in to consider climate change requirements as set out in NPF4.
 - Consider the implications of 20-minute neighbourhoods, rural living and reducing emissions.
- 2.165 Evidence relating to the nature crisis is also relevant to this topic area but has been more extensively set out in the Biodiversity and Natural Places Topic Paper. The Proposed Plan will need to address the twin threats of climate change and the nature crisis and best address these through an emphasis on place and healthy living.

Policy 2 – Climate Mitigation and Adaptation

- 2.166 See Policy 1 Tackling the climate and nature crisis

Policy 10 – Coastal Development

- 2.167 For Dundee, the Proposed Plan will require to take into account areas of developed and undeveloped coast. Through this, consideration and analysis will also be required into the implications of projected coastline changes in the city, and the potential impacts of these. Identifying opportunities for soft engineering solutions which provide ecological solutions where possible, rather than hard structures on undeveloped coastline is a key consideration.
- 2.168 Furthermore, and related to this will be for the Proposed Plan to consider projected sea level changes and the probability of flooding from all sources. The above data sources and evidence also include reference to the River Basin Management Plan. This is important for Dundee, in particular the two main water courses which flow into the Tay and the implications of these and coastal development. The significance of these water courses, and the impacts of climate change, is a key consideration in moving forward to the Proposed Plan. The National Marine Plan refers to this, but as this plan is now quite

dated, its importance will now be how the aims and objectives of this are taken forward into the Proposed Plan alongside current projects and policy objectives for the future.

Policy 11 - Energy

- 2.169 The growth in electric vehicles, emerging technologies such as hydrogen, and changes to how we store energy across the system will impact electricity networks and are likely to place extra pressure on the electricity network's ability to generate, store and deliver the capacity necessary to meet peaks in demand. A 'whole systems' approach is required which considers heat, electricity and transport in planning future decarbonised energy systems.
- 2.170 In respect of stand-alone energy production facilities, it is doubtful that this policy will have a significant impact upon Dundee due to the limited geographical area. The City does however have obvious opportunity for small scale renewables to play a role as well as supporting the offshore renewable energy industries. Existing and emerging strategies for the delivery of key strategic grid improvements and the delivery of renewables will help to identify key locations in the LDP. There are clear links between this policy theme and heating/cooling as well as the Infrastructure First approach set out in NPF4.
- 2.171 Energy infrastructure must not have a detrimental impact on nationally and internationally important designated sites and valued natural and cultural assets. However, due to the constrained urban area of Dundee, the assessment of new critical energy infrastructure will need to consider wider public benefits as well as quantifiable detrimental impacts on a designation or asset.

Policy 12 – Zero Waste

- 2.172 The evidence above reiterates that transforming our economy into a circular one, where materials are kept in use for longer, is key to responding to zero waste challenges. This is a key commitment of the Scottish Government in tackling the climate emergency. The climate emergency has intensified our focus on emissions reduction, and how we view and treat our resources. We can see day-to-day the impacts that climate change and the nature crises are having on our communities, our society, our economic wellbeing, and our environment in Dundee.
- 2.173 Achieving zero waste, and a circular economy, going forward must be a team effort, with planning having part of that responsibility. Clear direction through the Local Development Plan will ensure consistency in decision making through planning applications and help contribute to national goals. The Proposed Plan and spatial strategy will require to consider and identify appropriate locations for new waste management infrastructure.

Policy 19 – Heating and Cooling

- 2.174 The LDP can have a role in increasing awareness of the importance of improving energy efficiency, tackling fuel poverty and promoting measures for new development to meet net zero.
- 2.175 Heat Network Zones (HNZ) identified through the LHEES should be included in the LDP as designated areas. There are five Priority Zones identified within the LHEES as strategically important for heat network development in Dundee. The Priority Zones appear well suited to the building and operation of heat networks and have been given the highest priority as they incorporate additional contextual factors such as fuel poverty, existing heat networks, feasibility studies and decarbonisations plans. The LHEES Delivery Plan provides a summary of the priorities, targets and indicators that will be used to measure the progress of LHEES and this will be a key monitoring and delivery tool that will inform the inclusion and designation of HNZs within the spatial strategy of the LDP.
- 2.176 Development proposals within or adjacent to a Heat Network Zone identified in the LDP, will be only supported where designed and constructed to connect to an existing heat network.
- 2.177 The LHEES and Scotland Heat Map will inform the potential for co-locating developments with a high heat demand together with sources of heat supply such as heat recovered from surplus or waste heat sites (e.g. wastewater treatment sector).

Statements of Agreement / Dispute

Statements of Agreement

2.178 As outlined within the Summary of Stakeholder Engagement, a significant level of engagement was carried out with multiple stakeholders during pre-consultation, consultation, and post-consultation of the topic paper. The following organisations agree with the evidence base presented:

- NatureScot (STA032)
- Historic Environment Scotland (STA004)
- SSEN Transmission (STA029)
- Scottish Water (STA024)
- Homes for Scotland (STA047)
- Hallam Land (STA043)

Statements of Dispute

2.179 There was one area of dispute for the Climate Change Topic Paper. Dundee Civic Trust remain in dispute with the evidence in this topic paper, citing the paucity of the Local Area Energy Plan relating to potential for energy generation from solar PV rooftop installations in Dundee. While their initial response to the consultation did not wish to formally dispute the summary of evidence and/or implications for the Proposed Plan, subsequent email correspondence reversed this after publication of the Local Area Energy Plan which was in draft during the period of the first consultation. They argue that the LAEP underplays the evidence about where solar PV energy generation can occur, particularly for hard to retrofit properties. They also raised concerns about the accuracy of the figure for the total energy generation from rooftop solar PV generation within the LAEP and wish to see a more ambitious figure for increasing rooftop PV capacity by 2033.

2.180 **DCC Response:** The Dundee Local Area Energy Plan, developed in collaboration with SSEN through the RESOP Project, outlines modelled potential scenarios to support the city's transition to net zero. This is a dynamic document that will evolve in response to various factors affecting Dundee's technological capacity and climate targets. SSEN and NESO are actively mapping current grid capacity and forecasting future energy demand. Planned grid enhancements will influence the city's ability to deploy technologies such as photovoltaic (PV) systems. The plan acknowledges that target figures may shift as further analysis is conducted and aligns with current government strategies and objectives.

Biodiversity, Natural Places, Trees, and Soils (003)

Issue: Topic / Place	Biodiversity, Natural Places, Trees and Soils (DER003)
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended, Section 15(5) • the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district. • any change which the planning authority thinks may occur in relation to any of the matters mentioned above.
Links to Evidence	Policy 3 – Biodiversity • National Planning Framework 4 (DED201) • Dundee Local Development Plan 2019 (DED088) • Scotland's Biodiversity Strategy and Delivery Plan (DED257) • State of Nature Report 2023 (DED333) • NatureScot- Developing with Nature Guidance (DED054) • Biodiversity: draft planning guidance (DED062) • NBN Atlas Scotland (DED210) • Net Zero Transition Plan 2024-2030 (DED211) • Dundee Natural Capital Baseline Assessment Report (DED092) • Dundee Biodiversity Action Plan 2020-2030 (DED064) • Dundee Biodiversity Duty Report 2024-2025 (DED065) • Dundee's Biodiversity Storymap (DED167) • Dundee Climate Change Risk and Vulnerability Assessment (2024) (DED074) • Urban ReLeaf Citizen Science Project (DED301) • Habitat Map of Scotland (DED141) Policy 4 – Natural Places • National Planning Framework 4 (DED201) • Dundee Local Development Plan 2019 (DED088) • Dundee Green Network 2016 (DED083) • CivTech 8.3 Challenge- Nature Networks (DED027) • NatureScot Nature Networks Framework (DED125) • NatureScot SiteLink (DED208) • Dundee Public Open Space Strategy 2008 - 2011 (DED097) • Core Paths (DED042) • National Marine Plan (2015) (DED256) • River Basin Management Plan for Scotland 2021 - 2027 (DED249) • Sites of Special Scientific Interest (SSSI) (DED352) • Ramsar Wetlands of International Importance (DED240) • Local Nature Reserves (DED185) • Scotland Land Cover Map 2022 - EUNIS Level 1 (DED316) • Scotland Land Cover Map 2022 - EUNIS Level 2 (DED317) • Scotland Land Cover Map - Change 2020-2022 (DED255) • Water Classification Hub (DED304)

- SEPA Flood Hazard Maps ([DED279](#))
- SEPA Environmental Data ([DED345](#))

Policy 5 - Soils

- National Planning Framework 4 ([DED201](#))
- Dundee Local Development Plan 2019 ([DED088](#))
- Scotland's Biodiversity Strategy and Delivery Plan (2022) ([DED257](#))
- Scotland's Soils – National Soil Map of Scotland ([DED264](#))
- Scotland's Soils – Carbon and Peatland 2016 ([DED327](#))
- Scotland's Soils – Land Capability for Agriculture ([DED331](#))
- James Hutton Institute land use classification map ([DED168](#))
- Scottish Environment, Food and Agriculture Research Institutions (SEFARI) – Healthy Soils for a Green Recovery (2022-2027) ([DED343](#))
- Habitat Map of Scotland ([DED141](#))
- Scotland Land Cover Map 2022 - EUNIS Level 1 ([DED316](#))
- Scotland Land Cover Map 2022 - EUNIS Level 2 ([DED317](#))
- Scotland Land Cover Map – Change 2020-2022 ([DED255](#))
- Map of soil erosion risk ([DED189](#))
- Map of soil leaching potential ([DED190](#))
- Map of runoff risk ([DED188](#))
- Nitrate Vulnerable Zone ([DED216](#))
- Map of subsoil compaction risk ([DED398](#))
- Map of topsoil compaction risk ([DED399](#))

Policy 6 - Forestry, Woodland and Trees

- National Planning Framework 4 ([DED201](#))
- Dundee Local Development Plan 2019 ([DED088](#))
- Scotland's Forestry Strategy (2019-2029) ([DED320](#))
- Strategic Forest Plan – Dundee City Woodlands (2015-2025) ([DED339](#))
- Native Woodland Survey of Scotland and Ancient woodland Inventory ([DED262](#))
- Tree Preservation Orders ([DED297](#))
- National Forest Inventory 2021 ([DED198](#))
- Scottish Ancient Woodland Inventory ([DED332](#))
- Ancient Tree Inventory ([DED017](#))
- Designation Policy and Selection Guidance ([DED052](#))
- Gardens and Designed Landscapes ([DED128](#))
- Spatial data (Gardens and Designed Landscapes) ([DED355](#))
- Tree Equity Map ([DED296](#))

Policy 8 - Greenbelts

- National Planning Framework 4 ([DED201](#))
- Dundee Local Development Plan 2019 ([DED088](#))
- Dundee Green Network 2016 ([DED083](#))
- Landscape character assessment – Tayside (2019) ([DED173](#))
- NatureScot National Landscape Character Assessment (2023) ([DED207](#))
- Initial thinking around Green belts for NPF4 (2021) ([DED166](#))
- Greenbelts Scotland - data (2023) ([DED135](#))
- Landscape Character Assessment 2019 ([DED174](#))
- Framework for Nature Networks in Scotland – Draft ([DED125](#))

Summary of Evidence

Policy 3 – Biodiversity

National Planning Framework 4 (NPF4) [DED201](#)

- 3.1 Restoring and better connecting biodiversity and providing nature-positive places is a principal policy in NPF4. It sets out new requirements for development to deliver positive effects to address the global biodiversity crisis, primarily under Policy 3.
- 3.2 The policy states that “LDPs should protect, conserve, restore and enhance biodiversity in line with the mitigation hierarchy. They should also promote nature recovery and nature restoration across the development plan area, including by facilitating the creation of nature networks and strengthening connections between them to support improved ecological connectivity; restoring degraded habitats or creating new habitats; and incorporating measures to increase biodiversity, including populations of priority species.”
- 3.3 Implications for development management include that development proposals should integrate nature-based solutions where possible, with more significant enhancements required for national or major development, or for development that requires an Environmental Impact Assessment. Measures should be proportionate to the nature and scale of development.

Dundee Local Development Plan 2019 [DED088](#)

- 3.4 Policy 32: National and International Nature Conservation Designations states that any development proposal that is likely to have a significant effect on the conservation management of the European site must include a Habitats Regulations Appraisal of the implications on the conservation objectives of the designations.
- 3.5 Policy 33: Local Nature Conservation Designations Development states that development which could have a significant effect on the conservation interests associated with Local Nature Reserves, Locally Important Nature Conservation Sites or Wildlife Corridors will only be permitted where it satisfies 3 criteria.
- 3.6 Policy 34: Protected Species states that development proposals which are likely to have a significant effect on a European protected species will not be supported unless they satisfy 2 criteria.
- 3.7 Policy 38: Protecting and Improving the Water Environment aims to safeguard and enhance Dundee's water environment in alignment with the Water Framework Directive and Scotland River Basin Management Plan 2 (RBMP). Development proposals must not compromise these objectives, considering impacts such as morphological changes, pollution, and non-native species invasion. Engineering works that harm the water environment won't be supported, while opportunities for improvement, like de-culverting and riparian buffer zones, are encouraged. The Dundee Water Environment and Strategic Flood Risk Assessment 2016 guides local interpretation and mitigation measures on a site-specific basis. When assessing proposals, the Council considers RBMP and the Dundee Assessment, ensuring developments align with water environment protection and improvement goals.

Scotland's Biodiversity Strategy and Delivery Plan (2023) [DED257](#)

- 3.8 This strategy sets out a clear ambition: for Scotland to be Nature Positive by 2030, and to have restored and regenerated biodiversity across the country by 2045.
- 3.9 The strategy identifies the following six objectives to put Scotland on track for halting the loss of biodiversity and being nature positive by 2030:
1. Accelerate restoration and regeneration;
 2. Protect nature on land and at sea, across and beyond protected areas;
 3. Embed nature-positive farming, fishing and forestry;

4. Protect and support the recovery of vulnerable and important species and habitats;
5. Invest in Nature; and,
6. Take action on the indirect drivers of biodiversity loss.

State of Nature Report (2023) [DED333](#)

3.10 The State of Nature 2023 report uses data from biological monitoring and recording schemes to provide a benchmark for the status of wildlife in the UK. While the report shows both losses and gains for biodiversity, measures of both average abundance and average distribution of species show that Scotland's wildlife has declined substantially in recent decades. 11% of 7,508 species in Scotland that have been assessed using IUCN Red List criteria have been classified as threatened with extinction and many species previously only present in the south of the UK are now present in Scotland and increasing in abundance.

NatureScot- Developing with Nature Guidance (2022) [DED054](#)

3.11 This guidance was published in support of policy 3(c) of National Planning Framework 4 to assist anyone making or considering a planning application under Scotland's Planning Acts for certain local developments. This is non-statutory guidance and not part of the development plan. However, applicants and planning authorities are expected to give this guidance due consideration through the site selection, design and planning application process. It promotes an ecosystem approach - understanding how proposed development interacts with ecosystems and their services. This involves early consideration of nature in the design process.

3.12 There are 5 principles for Developing with Nature:

- Take an ecosystem approach - consider impacts on ecosystems and their services
- Prioritise nature - aim for net positive outcomes for biodiversity
- Think in 3D - consider above and below ground habitats and connections
- Work with natural processes - design with nature in mind, enhance natural features
- Bring nature in - incorporate green/blue infrastructure and nature-based solutions.

Biodiversity: draft planning guidance (2023) [DED062](#)

3.13 This guidance sets out the Scottish Ministers' expectations for implementing NPF4 policies which support the cross-cutting NPF4 outcome 'improving biodiversity'. It sets out ways for planners and developers to minimize impacts and maximize benefits for biodiversity through the planning process. Development plans should identify international, national and local priority habitats and species and safeguard them from adverse impacts. Development proposals should follow the mitigation hierarchy - avoid, minimize, restore, offset impacts on biodiversity. Net biodiversity gain should be sought where possible.

National Biodiversity Network atlas [DED210](#)

3.14 The NBN Atlas is an online database that provides access to millions of wildlife records from across Britain and Ireland. It brings together data from a range of national schemes and local recording groups. Within the City Council boundary, the atlas displays occurrences of over 1500 species recorded between 1850 and 2025. The records show where species have been recorded and allow users to generate maps and lists for any location. It covers all taxonomic groups from mammals and birds to fungi, plants, and invertebrates.

Net Zero Transition Plan 2024- 2030 [DED211](#)

3.15 This organisational plan covers all service areas and includes climate resilience and biodiversity actions. The aims of the Net Zero Transition Plan are:

- Set out a clear roadmap for our transition to become a net zero organisation with a set of corporate actions across Net Zero emissions, Circular Economy, Climate Resilience and Just Transition;
- Implement a carbon accounting process that will embed delivery across all our Services;
- Ensure our activities and infrastructure are resilient to a changing climate;

- Engage and involve our staff, customers and the public in our journey to become a net zero organisation; and
- Act as a local leader and support the city of Dundee and Scotland in ambitions for a net zero society.

Natural Capital Baseline Assessment [DED092](#)

3.16 In March 2023, a Natural Capital Baseline Assessment of Dundee was carried out as a starting point to future adaptation planning. This report used a specially adapted Scottish biodiversity metric to calculate the number of biodiversity units that the natural assets provide with an average of 10.4 units per hectare for Dundee. It calculated 550 ha of important biodiversity areas within the city. It was highlighted that some areas such as Riverside Nature Park, provide a very high number of units for the size of the area. This helped to identify opportunities for carbon storage and sequestration, soil erosion prevention, flood risk reduction, important areas for pollinators, important biodiversity habitats and opportunities for enhancement.

Dundee Biodiversity Action Plan 2020-2030 [DED064](#)

3.17 The Dundee Biodiversity Action Plan (BAP) was produced to raise awareness of the wildlife (flora and fauna) of Dundee in an international, national and local context. It focuses on the ecosystems, habitats and species most in need and ensures prioritisation of resources at a local level. The plan sets out clear objectives and targets to enable the monitoring of progress and enables measurement of achievements.

3.18 The plan outlines objectives and actions for each ecosystem and a number of cross ecosystem topics including planning and development. The main overall objectives of the plan are:

3.19 To promote sympathetic management to improve the health of Dundee's ecosystems and ensure key sites are managed to a high standard for biodiversity.

- To ensure no net loss of habitat and, where appropriate, increase the extent of the distribution and connectivity of all habitats.
- To find a balance between providing for biodiversity and providing public amenities for all users within the city.

3.20 The Biodiversity Action Plan is being reviewed and an update will be presented to committee in 2026.

Dundee Biodiversity Duty Report 2024/25 [DED065](#)

3.21 This is the fifth annual update of progress on the Biodiversity Action Plan. It evidences delivery of Dundee City Council's Biodiversity Duty during this period and follows the most recent Scottish Government/ NatureScot guidance. Some key projects highlighted include the successful management of Ash Dieback on council owned land, the planting of native trees in Templeton Woods, and enhancements at Stobsmuir Ponds including vegetation rafts.

Dundee's Biodiversity Story Map [DED167](#)

3.22 This interactive GIS Story Map sets out existing biodiversity value in Dundee and gives recent notable examples of biodiversity improvement initiatives. It includes a map of the distribution of sites which will form the basis of the city's Nature Network. It shows where the mowing regime has been relaxed to create biodiversity grasslands and naturalised grasslands. Some sites have additional spring bulb planting to create pollinator banks. This dataset also sets out the location of invasive non-native species of Giant Hogweed as well as recent projects to enhance ponds and wetlands and nature-based solutions.

Dundee Climate Change Risk and Vulnerability Assessment (2024) [DED074](#)

3.23 This assessment helps to understand how the climate is projected to change locally within the city, future climate hazards and likely associated risks. It identifies 104 climate change risks to the Council as well as some benefits and opportunities (for example, opportunities for active travel from increased temperature). Though the assessment identifies potential threats to nature, it also highlights that

warming may allow for new species to populate the city leading to greater biodiversity and enhanced ecosystem services. However, this is difficult to understand with great uncertainty, and new species may bring risks to current species as well as benefits. A more in-depth summary of the Climate Risk and Vulnerability Assessment is included above in the summary of Evidence for NPF4 Policy 1.

Urban ReLeaf Citizen Science Project [DED301](#)

3.24 Urban ReLeaf is a four-year cross-cultural EU project from January 2023 that aims to co-create citizen-powered data ecosystems to support climate change adaptation, green infrastructure, and urban design planning. Dundee City Council is collaborating with the University of Dundee to deliver a two-year citizen sensing pilot monitoring a range of environmental issues that relate to Dundee's green transitions for the built environment. Dundee is one of six cities across Europe to capture citizen data on the local environment to identify nature-based solutions to issues such as biodiversity loss.

Habitat Map of Scotland [DED141](#)

3.25 The Habitat Map of Scotland contains habitat and land use data including information on Sand Dune Vegetation, and Native Woodland. This can be used in conjunction with other datasets to identify opportunities for connecting habitats through corridors and stepping-stones.

Habitats Regulations Appraisal

3.26 Planning authorities must undertake a Habitats Regulations Appraisal in LDP preparation in accordance with The Conservation (Natural Habitats) Regulations 1994 to assess potential impacts on designated European sites. When considering the effects of the plan it is important not to be limited to the planning authority boundary, and to consider whether there is an obvious pathway for effects to impact sites within the vicinity. The following European sites may be included in the screening process, the list will be finalised in consultation with NatureScot:

Name	Designation
Firth of Tay and Eden Estuary	Special Protection Area and Special Area of Conservation
River Tay	Special Area of Conservation
Barry Links	Special Area of Conservation
Moray Firth	Special Area of Conservation
Isle of May	Special Area of Conservation
Outer Firth of Forth & St Andrews Bay Complex marine	Special Protection Area

3.27 The appraisal is expected to identify potential impacts of proposed policies and sites on protected habitats and species and recommend mitigation measures if necessary. It will help inform the Strategic Environmental Assessment (SEA).

Policy 4 – Natural Places

National Planning Framework 4 (NPF4) [DED201](#)

3.28 Policy 4 seeks to protect, restore and enhance natural assets making best use of nature-based solutions. Accompanying this policy, it is noted that LDPs will identify and protect locally, regionally, nationally and internationally important natural assets, on land and along coasts. The spatial strategy should safeguard them and take into account the objectives and level of their protected status in allocating land for development. Spatial strategies should also better connect nature rich areas by establishing and growing nature networks to help protect and restore the biodiversity, ecosystems and natural processes in their area.

Dundee Local Development Plan 2019 [DED088](#)

- 3.29 Policy 28: of the Dundee Local Development Plan aims to protect and enhance the city's green infrastructure network. Development proposals must safeguard existing green spaces and contribute to the network's expansion where appropriate. Changes in land use from designated green infrastructure sites require justification, either through adherence to approved masterplans, provision of compensatory green space, or enhancements to recreational value. Outdoor sports facilities are to be safeguarded unless minor impacts occur, or they're replaced by facilities of equal quality. Compatibility with Dundee's Physical Activity and Pitch Strategies is also required, ensuring development aligns with broader community needs.
- 3.30 Policy 29: focuses on safeguarding, improving, and extending outdoor access routes, especially those supporting the Dundee Green Network. The Council will protect existing and proposed access routes affected by development unless a satisfactory alternative route can be agreed. The policy seeks to secure additional access opportunities from developments and ensure temporary disruptions are mitigated with alternative routes during construction, reinstating them post-development.
- 3.31 Policy 30: addresses the long-term maintenance of green infrastructure in new housing developments. The Council will enforce planning conditions or Section 75 obligations to secure maintenance provisions. Developers must choose between two options: either the Council adopts and maintains the green infrastructure, with developers contributing to maintenance costs, or developers transfer the infrastructure to a third party or residents, who then assume responsibility for maintenance.
- 3.32 Policy 31: regulates development in Dundee's Open Countryside, aiming to uphold sustainability principles by minimizing greenfield use. New development in these areas is generally discouraged unless meeting specific criteria: limited additional buildings in existing groups, restoration of architecturally significant stone buildings, agricultural justification, or alignment with approved masterplans. This aims to reduce travel needs, promote community regeneration, and prioritize brownfield site reuse. By limiting development in open countryside, the policy aims to protect natural landscapes, conserve rural character, and promote sustainable urban growth in Dundee.
- 3.33 Policy 32: focuses on Dundee's nationally and internationally significant natural heritage, particularly Natura sites within the Tay Estuary. Any proposal affecting these areas must undergo a Habitats Regulations Appraisal, ensuring conservation objectives aren't compromised. For international sites, development is permitted only if an Appropriate Assessment confirms no adverse effects or if imperative national interests justify it. Similarly, development on national sites is allowed if benefits outweigh adverse effects or if integrity is maintained.
- 3.34 Policy 33: addresses development's impact on Dundee's local nature conservation sites. Proposals affecting these areas must undergo an ecological assessment to identify potential impacts. Development is permitted only if negative impacts can be contained and mitigated without compromising the area's integrity. Additionally, it must be shown that no alternative sites can accommodate the development. This policy ensures the protection of local biodiversity hotspots while allowing for sustainable development under strict conditions.
- 3.35 Policy 38: aims to safeguard and enhance Dundee's water environment in alignment with the Water Framework Directive and Scotland River Basin Management Plan 2 (RBMP). Development proposals must not compromise these objectives, considering impacts such as morphological changes, pollution, and non-native species invasion. Engineering works that harm the water environment won't be supported, while opportunities for improvement, like de-culverting and riparian buffer zones, are encouraged. The Dundee Water Environment and Strategic Flood Risk Assessment 2016 guides local interpretation and mitigation measures on a site-specific basis. When assessing proposals, the Council considers RBMP and the Dundee Assessment, ensuring developments align with water environment protection and improvement goals.

Dundee Green Network 2016 [DED083](#)

- 3.36 Dundee is a city which benefits from more urban green space per head of population than anywhere in the UK. The network of green infrastructure in the city includes 59 parks covering 4000 acres (this includes cemeteries and allotments) and a 27-mile footpath/cycleway circumnavigating internationally

important sites on the inner reaches of the Tay Estuary and locally important green and blue spaces enjoyed by both residents and visitors alike. Green infrastructure assets include Camperdown Country Park, Baxter Park, Broughty Ferry Local Nature Reserve, The Miley, The Law, Riverside Nature Park, Dighty Green Corridor, Trottick Ponds and Templeton Woods and green connections such as the Dundee Green Circular, Greenways, Core Paths and National Cycle Routes.

3.37 Dundee's Green Network was identified through a collaborative process with SNH (now NatureScot). The Dundee Green Network 2016 contains an interactive map with links to detailed aerial maps identifying existing assets and opportunities to protect and enhance them.

3.38 For planning, new development offers an opportunity for the Council to work with its partners to strengthen and extend the network of green infrastructure. It is important to ensure that as the City develops and embraces change, people living, working, or visiting the City continue to have access to quality, connected, multifunctional and well managed green infrastructure.

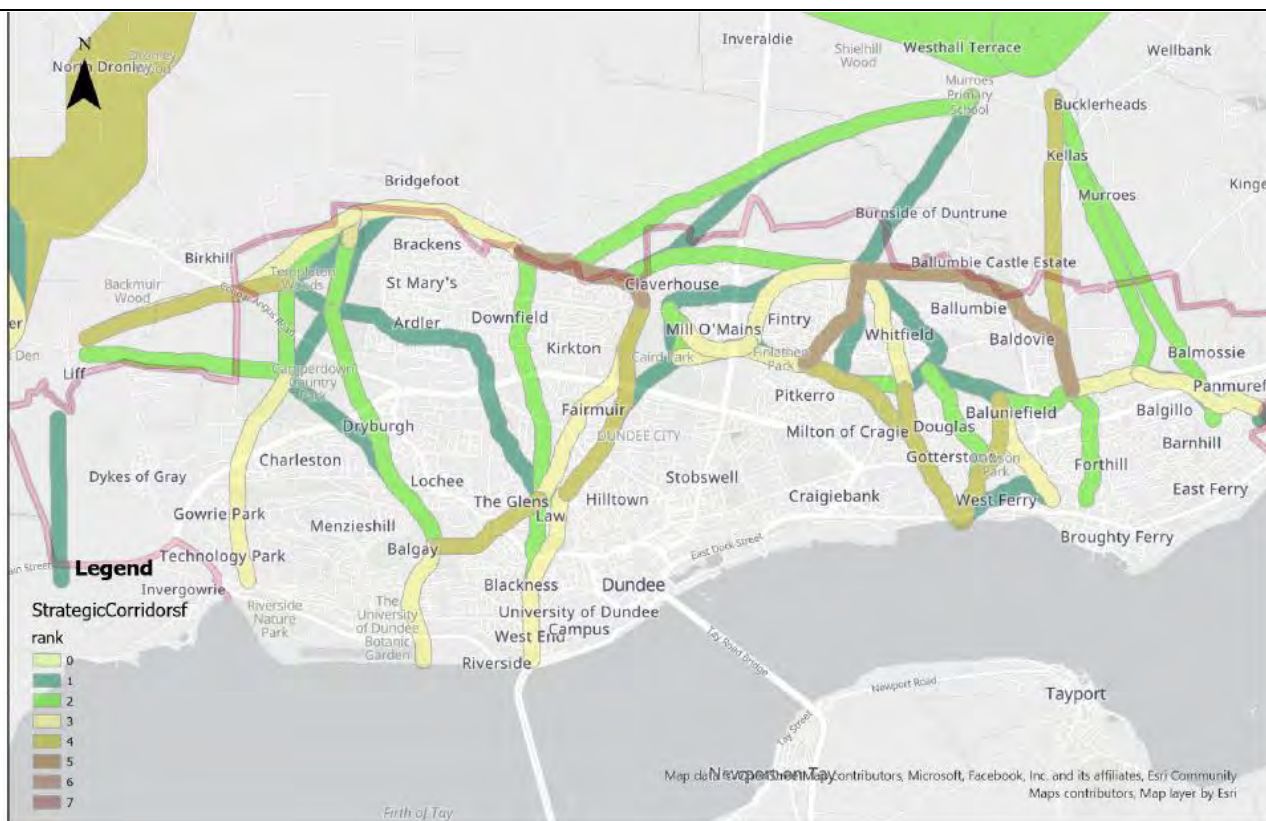
3.39 Connecting individual elements into a multifunctional green network helps to:

- provide a range of opportunities for leisure and recreation;
- improve environmental quality;
- link and create wildlife habitats; and
- protect existing features.

CivTech 8.3 Challenge- Nature Networks Corridors [DED027](#)

3.40 NatureScot and Scottish Wildlife Trust are co-sponsoring a project on "how can technology help to create a nature network across all of the different areas of Scotland?". Dundee is one of five Local Authorities working with Aecom to develop a process for identifying and mapping wildlife connectivity and opportunities for habitat creation using a place-based approach. New map datasets will include wildlife connectivity, nature network corridors, nature recovery opportunities, and a connectivity simulator. The Nature Networks Tool is an opportunity to review, enhance and strengthen the current Dundee Green Network by bringing together Council-owned data and data managed by Key Agencies such as Scottish Water, NatureScot and SEPA. The Local Biodiversity Action Plan and forthcoming Forestry and Woodland Strategy will be other key considerations in mapping Dundee's nature network opportunities.

3.41 The below map shows initial mapping of strategic corridors for nature within Dundee. This will be refined using a Natural Capital Tool provided by NatureScot and will then be open for public consultation in early 2026.



NatureScot Nature Networks Framework [DED125](#)

3.42 This framework aims to catalyse the urgent and transformative action needed across Scotland to implement Nature Networks that help halt and reverse biodiversity loss. It promotes the basic principles which associated action and delivery, at all levels, should be founded upon. The focus is on ensuring a deliver for a nature-rich future.

NatureScot SiteLink [DED208](#)

3.43 SiteLink provides access to data and information on key Protected Areas across Scotland including site boundaries, designated features and download supporting documents. There is also data on site management agreements and consultation cases along with links to other websites for supporting information.

3.44 The map can be viewed here: <https://sitelink.nature.scot/map>

3.45 Dundee has several nationally and internationally important natural heritage designations that focus on the Tay Estuary as it relates to the Council's administrative boundary.

3.46 The Firth of Tay and Eden Estuary Special Area of Conservation and Special Protection Area is a significant area for wildlife, including various bird species, marine life, and habitats such as mudflats, salt marshes, and intertidal zones. It provides important feeding and breeding grounds for birds, including migratory species. Additionally, part of the Outer Firth of Forth and St Andrews Bay complex Special Protection Area also extends into the waters of Dundee.

Dundee Open Space Audit and Strategy [DED097](#)

3.47 In late 2023, Dundee City Council awarded Ironside Farrar with a contract to undertake an Open Space Audit to inform an update to the city's Open Space Strategy. The audit will assess and map the quantity, quality and accessibility of open spaces in the city, using Green Flag assessment criteria and Ordnance Survey data. The final output is expected by the end of April 2024.

3.48 The audit will then inform an Open Space Strategy (OSS) which will set out a strategic framework of the planning authority's policies and proposals as to the development, maintenance and use of green and blue infrastructure in the city.

Core Paths [DED042](#)

3.49 Section 17 of the Land Reform (Scotland) Act requires Local Authorities to provide a system of core paths that are sufficient for the purpose of giving the public reasonable access throughout their area. These will link into wider path networks and general access areas, such as open land, woods, fields and hills.

3.50 The original Core Path Plan was adopted by Dundee City Council in 2009 after extensive consultations and with support and advice from Dundee's Local Access Forum. Paths in the plan have been improved, particularly through improvements in Dundee Waterfront. The Local Access Forum carried out surveys, and proposed changes to the plan. The changes were subject to consultations and were adopted by Dundee City Council on the 1st March 2020. A single amendment for a permanent diversion of Core Path 7 was adopted on the 24th July 2023.

Scotland's National Marine Plan (2015) [DED256](#)

3.51 Scotland's National Marine Plan serves as a framework for the sustainable management of Scotland's seas. The plan adopts an integrated approach to managing marine activities, considering social, economic, and environmental factors. It provides a framework for spatial planning in Scotland's marine environment, guiding the location and scale of different activities to minimize conflicts and protect sensitive areas. The plan emphasizes ecosystem-based management, aiming to safeguard the health and resilience of marine ecosystems while supporting sustainable use. It identifies areas of high ecological value, such as marine protected areas (MPAs), and sets objectives for their conservation and protection. The involvement of stakeholders in the planning and decision-making processes ensures that the interests of natural places and the communities reliant on them are taken into account. Dundee is within the Scottish Marine Region of Forth and Tay for the purposes of regional marine planning.

3.52 Scotland's National Marine Plan is being updated with the Scottish Government's Marine Directorate leading the process for the development of NMP2, starting in 2023 and taking several years.

River Basin Management Plan for Scotland 2021-2027 (RBMP3) [DED249](#)

3.53 This river basin management plan (RBMP) sets out a framework for protecting and improving the benefits provided by the water environment across Scotland. The Scottish Government, Scottish Environment Protection Agency (SEPA), responsible authorities and all of Scotland's other public bodies are responsible for developing and delivering the RBMP actions. These actions ensure that Scotland's rivers, lochs, estuaries, coastal areas and groundwater can continue to supply drinking water; support fisheries; offer an essential resource for business and agriculture and serve as a source of recreation that promotes health and wellbeing.

Other relevant data

3.54 A number of NatureScot, SEPA, and other national datasets have been identified as relevant in considering Policies 3 and 4 of NPF4:

Sites of Scientific Interest (SSSI) [DED352](#)

3.55 This dataset shows areas of land and water that NatureScot considers to best represent our natural heritage. One site is located within and adjacent to the Dundee City boundary, the Inner Tay Estuary, with a total site area of 4,132.95 ha. The Monifieth Bay SSSI also extends into the Dundee City Council boundary.

RAMSAR Wetlands of International Importance [DED240](#)

3.56 This dataset shows sites classified to meet the UK's commitments under the RAMSAR Convention. The First of Tay and Eden Estuary are two high-quality estuarine areas which are components of a large, geomorphologically complex area that incorporates estuarine and coastal habitats.

Local Nature Reserves (LNRs) [DED185](#)

3.57 Areas of Land set aside for nature which are designated to promote their conservation and enjoyment and managed by local authorities. Local examples include Broughty Ferry and Trottick.

Scotland Land Cover Map 2022 - EUNIS Level 1 [DED316](#) **and Scotland Land Cover Map 2022 - EUNIS Level 2** [DED317](#)

3.58 These Habitat and land cover maps created using AI to classify satellite data to EUNIS by Space Intelligence in partnership with NatureScot and can be used to help identify nature networks. For Dundee the maps separate out the urban environment and habitat and landcover.

Scotland Land Cover Map – Change 2020-2022 [DED255](#)

3.59 This dataset is a change map, which provides predicted land cover changes that occurred between 2020 and 2022.

SEPA Environmental Data [DED345](#)

- Water Classification Hub
- SEPA Flood Maps
- Scottish Wetland Inventory
- Geomorphic Risk Layer
- Riparian Vegetation Planting opportunities and conditions
- Obstacles to fish migration

3.60 The river network and other water environment features, such as wetlands, are key aspects of existing and proposed nature networks with the linear nature of riparian (river bank) corridors providing opportunities to create wildlife corridors and connect habitats.

3.61 SEPA data on the river network and riparian areas including the geomorphic risk layer, riparian vegetation planting opportunity layer and flood maps are crucial to nature network mapping.

Policy 5 – Soils

National Planning Framework 4 [DED201](#)

3.62 Policy 5 seeks to protect carbon-rich soils, restore peatlands and minimise disturbance to soils from development. Through this policy it is noted that LDPs should protect locally, regionally, nationally and internationally valued soils, including land of lesser quality that is culturally or locally important for primary use.

Dundee Local Development Plan 2019 [DED088](#)

3.63 Soils currently has limited mention within the Dundee Local Development Plan 2019. There is reference to carbon rich soils in the text relating to Policy 47: Wind Turbines, but no specific policy relating to soils.

Scotland's Biodiversity Strategy and Delivery Plan (2022) [DED257](#)

3.64 This draft biodiversity strategy sets out our clear ambition for Scotland to be Nature Positive by 2030, and to have restored and regenerated biodiversity across the country by 2045.

3.65 The strategy states that soil health will be improved by tackling loss of organic carbon, erosion, compaction, and the impacts of grazing, air pollution and climate change, and will function as a nature-based solution to flooding, erosion and biodiversity loss. Soils and species indicators also point to ecosystem health improvements and reveal which drivers are working positively or negatively across habitats and areas. Healthy biodiversity protects soil from eroding.

3.66 The strategy also states that impermeable surfaces can be replaced with species-rich grassland and urban woodland to increase soil biodiversity and capture carbon within the soil.

Scotland's Soils [DED264](#)

3.67 Scotland's soils are an important natural resource. They affect our health, our environment and our economy. Healthy soils can provide us with a wide range of benefits. Some of these benefits are obvious, like growing food, while many are less clear, like filtering water, reducing flood risk and regulating climate. In contrast, damaged soils can harm crops, pollute water and increase the risk of flooding. We need to look after our soils to make sure they can provide us with these benefits, both now and in future.

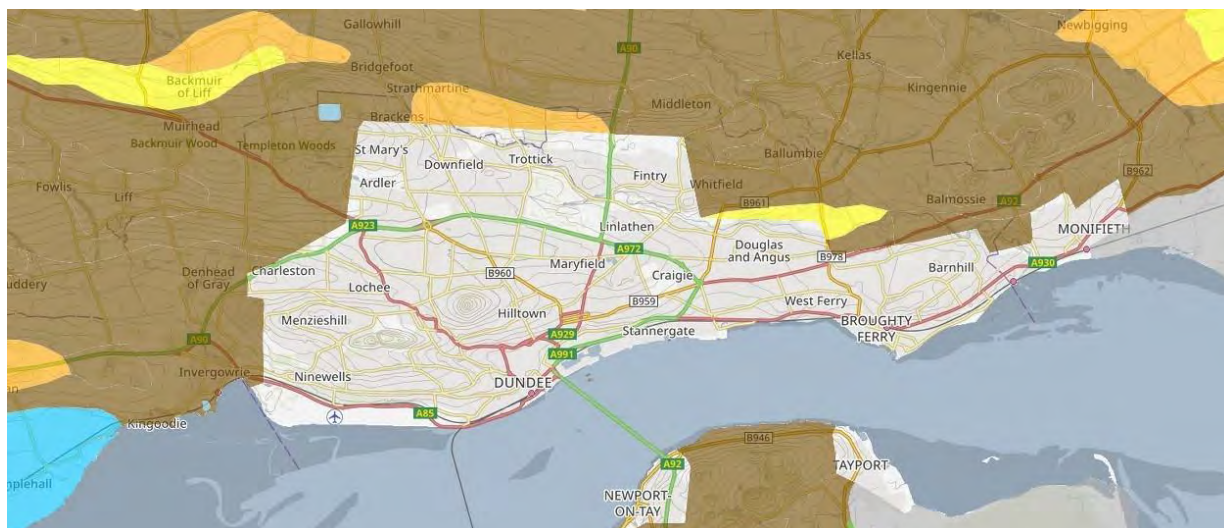


Figure 3.2 – National Soil Map of Scotland – Dundee and surrounding area

National Soil Map of Scotland: Generalised Soil Type

- Alluvial soils
- Brown soils
- Calcareous soils
- Immature soils
- Mineral gleys
- Mineral podzols
- Montane soils
- Peat
- Peaty gleys
- Peaty podzols
- Lochs

Figure 3.2 Image reference: https://map.environment.gov.scot/Soil_maps/?layer=1#

3.68 Dundee's outer periphery is predominately characterised by Calcareous soils, with a pocket of mineral gleys at Clatto. There is a stretch of mineral podzols to the northern boundary and a stretch of alluvial soils to the east of the city.

3.69 Dundee City only has no classified carbon rich soils.

James Hutton Institute land use classification map [DED168](#)

3.70 The Macaulay Institute developed a Land Use Capability (LUC) system which was based upon a series of guidelines that allowed soil maps and other landscape and climatic information to be interpreted into land classification maps.

3.71 Dundee City has areas of land capable for agriculture mainly around its outer boundaries identified on the Land Capability for Agriculture Map (Classes 2, 3.1 and 3.2). Classes 1-3.1 are classified as prime agricultural land in the Scottish Land Capability for agriculture map.

3.72 Due to Dundee's predominately urban environment there is a limit to the relevance of the land use classification map for the inner city area. Nonetheless, the map is of specific relevance to the outer periphery areas of Dundee. This should therefore be taken into account in developing the Proposed Plan and relevant policies relating to soils.

Scottish Environment, Food and Agriculture Research Institutions (SEFARI) – Healthy Soils for a Green Recovery [DED343](#)

3.73 The SEFARI Gateway undertake research and analysis to ensure scientific evidence helps inform the health, wealth and wellbeing of Scotland.

3.74 This project delivers new insights and knowledge on the role of Scottish soils, the benefits the benefits and identifies strategies to mitigate degradation, reduce loss and enhance soil health.

3.75 Overall, this project delivers data underpinning advances in scientific understanding of soil function and the complex role that soil has in contributing to ecosystem services. This is helping to develop strategies for sustainable management and minimise degradation and loss of Scotland's soils.

Data

3.76 A number of NatureScot, Scottish Government and other national datasets have been identified as relevant in the consideration of NPF4 Policy 5:

Habitat Map of Scotland [DED141](#)

3.77 This map shows varying habitat classifications across Dundee, from very small-scale habitats connected to buildings, to large scale habitat areas including golf courses.

Scotland Land Cover Map 2022 - EUNIS Level 1 [DED316](#) & Scotland Land Cover Map 2022 - EUNIS Level 2 [DED317](#)

3.78 These Habitat and land cover map created using AI to classify satellite data to EUNIS by Space Intelligence in partnership with NatureScot. For Dundee the maps separate out the urban environment and habitat and landcover.

Scotland Land Cover Map – Change 2020-2022 [DED255](#)

3.79 This dataset is a change map, which provides predicted land cover changes that occurred between 2020 and 2022.

SSW – Soil Map [DED264](#)

3.80 National coverage of the main soil types across Scotland mapped originally at 1:250 000 scale. The map is based on data collected between 1947 and 1981.

3.81 The following maps detail,

- The risk of a bare soil being eroded by water under intense or prolonged rainfall;
- The risk of potential pollutants and nutrients leaching through the soil to ground and surface waters.
- The risk of the soil becoming saturated, causing water (or any liquid applied to the soil) to flow over land (runoff) and carry potential pollutants into water courses, or to collect (pond) on the surface.
- Areas of cultural soils.
- Areas within Scotland that contain surface water or groundwater that is susceptible to nitrate pollution from agricultural activities.

- The vulnerability of subsoil and topsoil to compaction by traffic.
- **Map of soil erosion risk** [DED189](#)
- **Map of soil leaching potential** [DED190](#)
- **Map of runoff risk** [DED188](#)
- **HES – Canmore (cultural soils)** [DED152](#)
- **Nitrate Vulnerable Zone** [DED216](#)
- **Map of subsoil compaction risk** [DED398](#)
- **Map of topsoil compaction risk** [DED399](#)

3.82 They cover most of Scotland's cultivated agricultural land area and have some general implications in Dundee. The subsoil compaction risk map does not cover the whole city boundary, but some areas around the fringes have data coverage. This map shows that some areas including the Western Gateway and surrounding Baldovie Industrial Estate are extremely vulnerable to subsoil compaction. This has implications for urban agriculture, reducing the yield and quality of locally grown produce, as well as increased flood and water management issues.

Policy 6 – Forestry, Woodland and Trees

NPF4 Policy 6 Forestry, woodland and trees [DED201](#)

3.83 Policy 6 seeks to protect and expand forests, woodlands and trees. Through this policy it is noted that existing woodlands and trees are to be protected and cover is expanded, avoiding habitat fragmentation and improve ecological connectivity, helping to support and expand nature networks.

Dundee Local Development Plan 2019 [DED088](#)

3.84 LDP Policy 35: Trees and Urban Woodland states that the establishment and enhancement of woodland, tree belts and corridors will be supported. New development must ensure the survival of woodland, hedgerows and individual trees. This is especially the case for healthy mature trees, of nature conservation or landscape value through sensitive site layout both during and after construction, unless removal has been approved in advance by the council. Where appropriate, development proposals must be accompanied by maintenance arrangements and justification for the removal of any trees or hedgerows.

Scotland's Forestry Strategy [DED320](#)

3.85 This Strategy provides an overview of contemporary Scottish forestry, presents the 50-year vision for Scotland's forests and woodlands, and sets out a 10-year framework for action. It places forestry policy at the heart of government, helping to deliver the aims of the National Performance Framework, supporting the vision, objectives and principles of the Land Use Strategy, and building on the achievements of the previous strategy.

Strategic Forest Plan – Dundee City Woodlands [DED339](#)

3.86 The City of Dundee covers 6515 hectares and of this total amount, 4.3% (279 hectares) is woodland. There is a mixture of woodland, varying both in species composition and extent, including both old estate woodlands and new plantations. The woodland in Dundee provides multiple benefits for the city, including reduction of CO2, pollution and noise, as well as mitigating the effects of flooding and extreme weather. They provide attractive, relaxing places for the residents of the city to walk in and enjoy and help to protect the city's biodiversity.



Figure 3.3 : Strategic Forest Plan – Dundee Woodlands

- 3.87 The woodlands are listed and detailed as separate units, as they are spread over the whole city area. There are 27 sites in total.
- 3.88 A strategic approach is required for the management of Dundee's forest resource to make sure that all areas of appropriate woodland are managed properly; as such this Strategic Forest Plan has been created.
- 3.89 For planning in Dundee considerations around the location of woodlands go further than just understanding the forest resource. As set out in the Strategic Forest Plan understanding how an increase in the amenity and habitat value of Dundee's woodlands is important. Equally, the connectivity between and through forest resources across the city and associated habitat and biodiversity networks is important.
- 3.90 There is an action within the Biodiversity Action Plan to update Dundee's Tree and Urban Forestry Policy and integrate it with the Strategic Forest Plan to produce a comprehensive Urban Forest Masterplan for the city.
- 3.91 Work is ongoing to prepare a revised funding application for submission in late 2025. If successful, this would enable the development of the Urban Forest Masterplan in time to inform the spatial strategy.

Native Woodland Survey of Scotland and Ancient woodland Inventory [DED262](#)

- 3.92 The Native Woodland Survey of Scotland (NWSS) surveyed all native woods and near-native woods currently present on ancient woodland sites, as well as all other planted woods on ancient woodland sites (PAWS).
- 3.93 All Scotland's forests, woodlands and associated open ground habitats provide some biodiversity value. However, suitably managed native, and in particular ancient and semi-natural woodlands,

including appropriately restored Plantations on Ancient Woodland Sites (PAWS), will contribute the most.

- 3.94 Improving woodland condition is a strategic driver in Scotland's Forestry Strategy and target in the Scottish Biodiversity Strategy. The National Planning Framework 4 recognises the high value of ancient woods and semi-natural woodlands for nature conservation.

Tree Preservation Orders [DED297](#)

- 3.95 Tree Preservation Orders are supported and promoted by the Council to protect individual trees or entire planting schemes.
- 3.96 The map below shows where tree preservation orders are in place across Dundee.

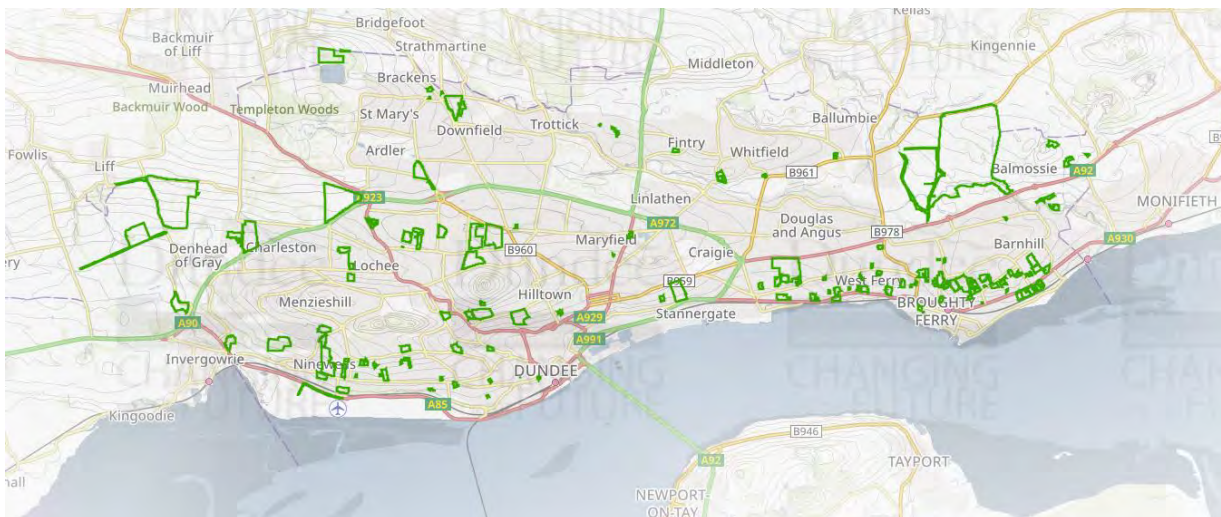


Figure 3.4 : Tree Preservation Orders in Dundee (© Crown copyright and database rights 2019 Ordnance Survey.100023371)

- 3.97 The presence of trees on a site is a planning consideration when planning applications are being assessed. Tree Preservation Orders can help protect woods and trees. Dundee has a number of individual trees and wooded areas protected by Tree Preservation Orders. These can help preserve and protect urban woodlands across the city.

National Forest Inventory 2021 [DED198](#)

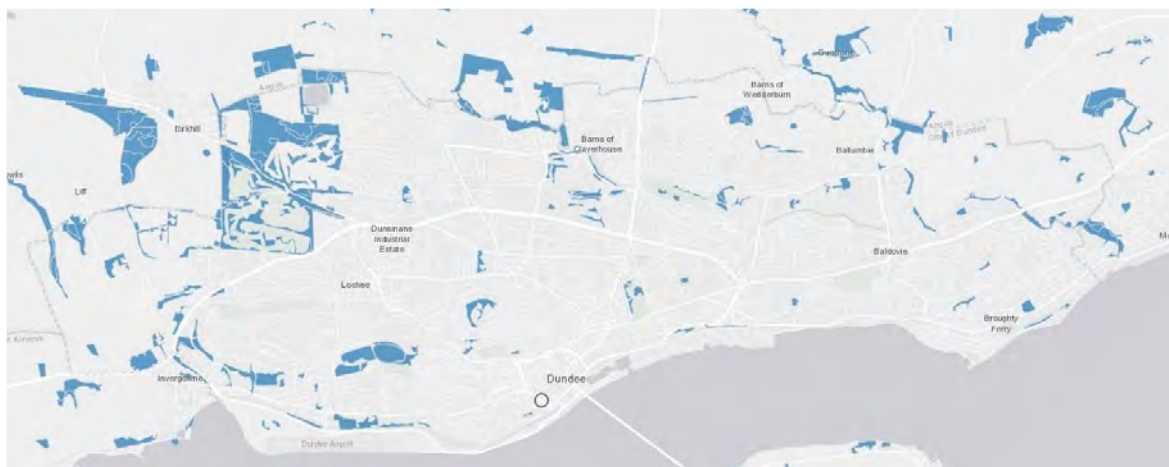


Figure 3.5 : Woodland in Dundee City 2021(Forestry Commission. © Crown copyright and database right 2023 Ordnance Survey [100021242])

3.98 It can be seen that concentrations of woodland in Dundee are largely towards the outer peripheries of the City with a large concentration around Camperdown Park. However, there are some larger concentrations within the inner city area including Arbortum Woodland, Balgay Park, the University of Dundee Botanical Gardens and the area surrounding the Law Hill to name a few. This is not an absolute constraint on development, providing the terms of Policy 6 of National Planning Framework 4 are met.

3.99 The datasets used above have their limitations, in particular, smaller areas of woodlands, hedgerows and/or individual trees are not identified. This may include trees along field boundaries and/or around watercourses. NPF4 identifies that existing trees and woodland are key factors for development to take account of.

Scottish Ancient Woodland Inventory [DED332](#)



Figure 3.6 : Ancient Woodland in Dundee City (Contains public sector information licensed under the Open Government Licence v3.0)

3.100 In order to fully understand trees and woodland across the city, it is important to consider all relevant datasets. As evident from Figure 4, it can be seen that there are classified ancient woodlands in the city. These are predominately around Camperdown Park and other smaller woodlands around the periphery, but also Balgay Park to the west of the city centre.

Ancient Tree Inventory [DED017](#)

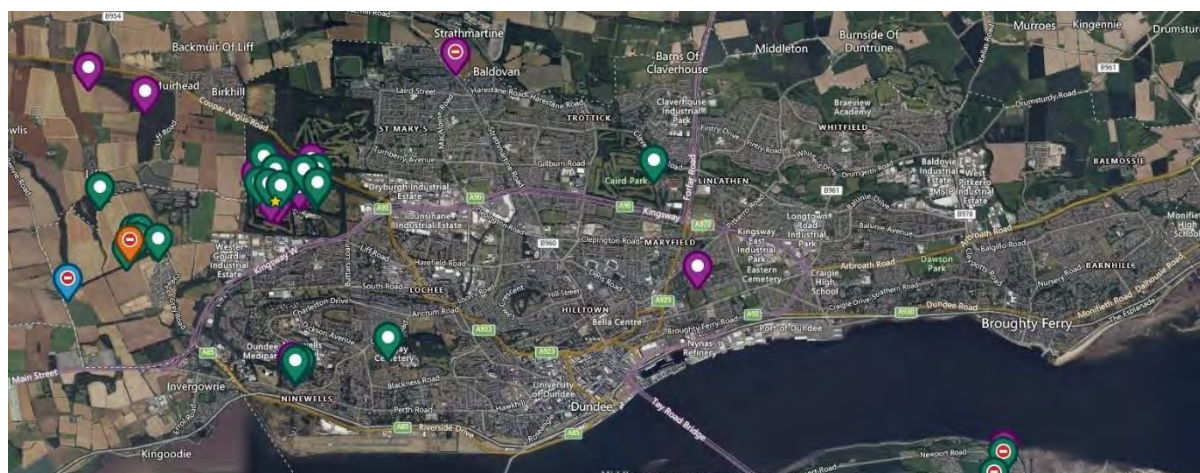


Figure 3.7 : Ancient Trees in Dundee City (© OpenStreetMap Copyright)

3.101 The above map in Figure 5 provides another layer of information regarding the status of trees across the city, evidencing the location of ancient trees in Dundee. These are largely concentrated within Camperdown Park but there are also smaller groupings and individual ancient trees elsewhere in the city.

Designation Policy and Selection Guidance - Gardens and Designed Landscapes [DED052](#)

- 3.102 Inventory Gardens and Designed Landscapes Gardens are grounds that are consciously laid out for artistic effect (such as country estate landscapes, botanic garden collections, urban parks and cemeteries) and are an important element of our historic environment and landscape.
- 3.103 In considering whether or not a garden and designed landscape is of national importance its cultural significance is examined under seven headings. Of particular interest to this topic paper are the headings of nature conservation interest, horticultural interest and scenic interest.
- 3.104 There are 3 Inventory GDLs in the Dundee area. These are [Balgay Park](#), [Camperdown House](#) and [Baxter Park](#).

Tree Equity Map [DED296](#)

- 3.105 Tree Equity Score UK is a map-based application that was created to help address disparities in urban tree distribution by identifying the areas in greatest need of people-focused investment in trees. This is mapped by datazone and provides information on canopy cover and climate and socio-economic characteristics that are integrated into the tree equity score. This is wide ranging for Dundee.

Policy 8 - Greenbelts

NPF4 Policy 8 Green belts [DED201](#)

- 3.106 Policy 8 Green belts encourages, promotes and facilitates compact urban growth and use the land around towns and cities sustainably. The policy states that development should be directed to the right locations, urban density is increased, and unsustainable growth is prevented. The character, landscape, natural setting and identity of settlements should be protected and enhanced. Nature networks are to be supported and land is managed to help tackle climate change.
- 3.107 The policy also outlines that green belts will not be necessary for most settlements but may be zoned around settlements where there is a significant danger of unsustainable growth in car-based commuting or suburbanisation of the countryside.

Dundee Local Development Plan 2019 [DED088](#)

- 3.108 LDP Policy 28: Protecting and Enhancing the Dundee Green Network states that development proposals shall protect and enhance the Dundee Green Network by ensuring that development will not lead to the fragmentation of the existing network of green infrastructure. New development should contribute to the Dundee Green Network where appropriate and as determined by the Council, through the integration of green infrastructure in masterplans or development frameworks and the creation and/or improvement of green infrastructure within development sites or in the local area.
- 3.109 LDP Policy 29: Outdoor Access and the Dundee Green Network states that the Council will seek to safeguard, improve and extend the network of outdoor access routes, with particular emphasis on the Core Path network and routes identified in the Dundee Cycling Strategy which support the development of the Dundee Green Network.

Dundee Green Network 2016 [DED083](#)

- 3.110 Dundee is a city which benefits from more urban green space per head of population than anywhere in the UK. The network of green infrastructure in the city includes 59 parks covering 4000 acres (this includes cemeteries and allotments) and a 27-mile footpath/cycleway circumnavigating internationally important sites on the inner reaches of the Tay Estuary and locally important green and blue spaces enjoyed by both residents and visitors alike. Green infrastructure assets include Camperdown Country Park, Baxter Park, Broughty Ferry Local Nature Reserve, The Miley, The Law, Riverside Nature Park, Dighty Green Corridor, Trottick Ponds and Templeton Woods and green connections such as the Dundee Green Circular, Greenways, Core Paths and National Cycle Routes.

3.111 Dundee's Green Network has been identified through a collaborative process with SNH (now NatureScot). The Dundee Green Network 2016 contains an interactive map with links to detailed aerial maps identifying existing assets and opportunities to protect and enhance them.

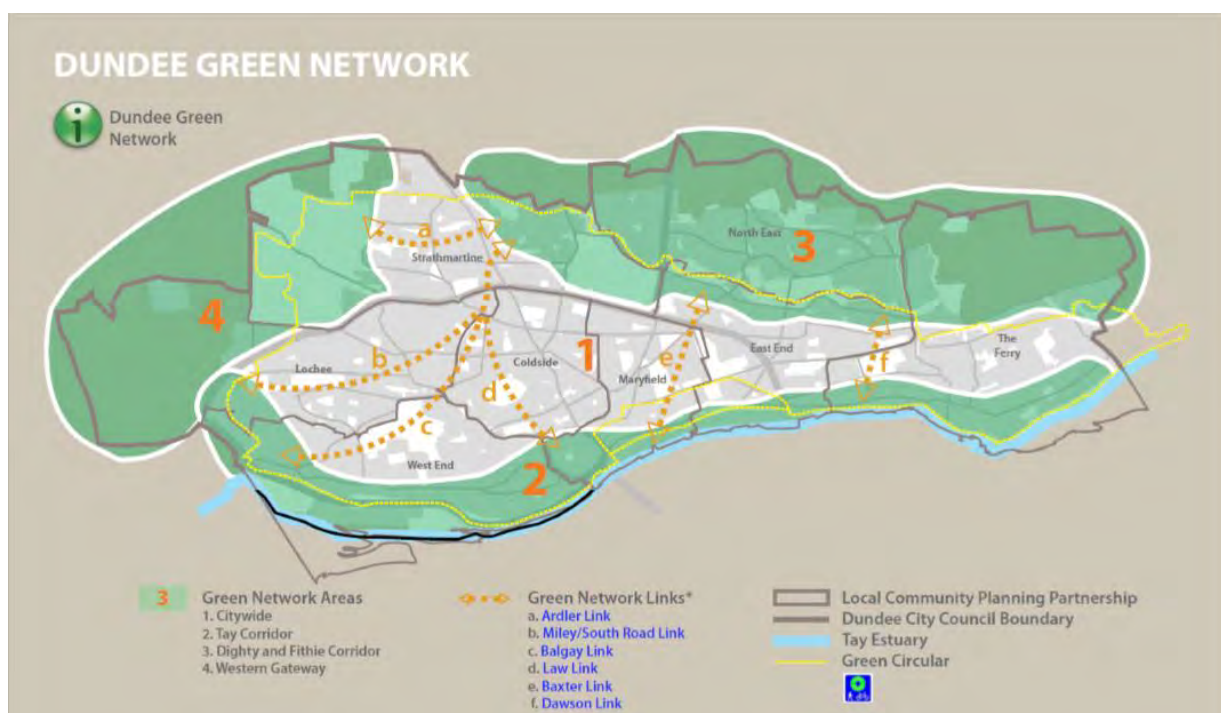


Figure 3.8 : Dundee Green Network (© Crown Copyright and database right 2017. All rights reserved. Ordnance Survey Licence No 100023371)

3.112 For planning, new development offers an opportunity for the Council to work with its partners to strengthen and extend the network of green infrastructure. It is important to ensure that as the City develops and embraces change, people living, working, or visiting the City continue to have access to quality, connected, multifunctional and well managed green infrastructure.

3.113 Connecting individual elements into a multifunctional green network helps to:

- provide a range of opportunities for leisure and recreation;
- improve environmental quality;
- link and create wildlife habitats; and
- protect existing features.

Landscape character assessment – Tayside - Landscape Evolution and Influences [DED173](#)

3.114 This document provides information on how the landscape of the local authority area has evolved. It complements the Landscape Character Type descriptions of the [2019 dataset](#).

3.115 The Tayside Region consists of two broadly distinctive geomorphological areas separated by the Highland Boundary Fault. Both are relevant to Dundee City specifically and connections to the wider region, which have implications for Dundee.

3.116 North of the Highland Boundary Fault, generally harder rocks have resulted in higher elevations despite being subject to similar glacial processes as to the south of the Fault. Much of this area is covered in either moorland or blanket bog, indicating higher rainfall and less fertile soils. Where valleys have been created or enlarged by glaciation, the more fertile soils occurring on drift deposits support agriculture.

3.117 To the south of the fault line are broad, flat, fertile straths corresponding with areas of softer sandstone, eroded during glaciation. The fertile soils which now cover these areas are the result of glacial drift deposits and eroded material carried down by rivers from the Highland glens.

- 3.118 The coast varies from steep cliffs to wide bays and to low areas with raised beaches. These raised beaches are covered by marine deposits originating from periods of former higher sea levels. The estuaries, especially Montrose Basin, form an important tidal habitat for wildlife, especially birds.
- 3.119 The large river systems help to shape the landscape and land use. The River Tay catchment supports hydroelectricity in the west of the area and intensive arable farming to its east.
- 3.120 The flat, low-lying Loch Leven Basin is in the southernmost part of lowland Tayside. Loch Leven itself is a large but relatively shallow freshwater loch. The area has widely recognised geological, archaeological, cultural, historical and ecological interests of regional, national and international importance.
- 3.121 The two ranges of hills south of the Highland Boundary Fault, the Ochils and Sidlaws, are igneous intrusions. As a result of tilting, these hills now form south-facing dip slopes and north-facing scarp slopes.

NatureScot National Landscape Character Assessment [DED207](#)

- 3.122 NatureScot commissioned, in partnership with others, a series of 30 regional LCA studies. Together, these identified, mapped and described the landscape character of all of Scotland (mostly at a scale of 1:50,000).
- 3.123 Each study typically covered a local authority area and provided the landscape foundation for natural heritage and planning policymaking. The studies have been used widely in the development planning system.
- 3.124 Scotland has a [digital map-based national LCA](#) (published in 2019). This shows Landscape Character Types (LCTs) – i.e. areas of consistent and recognisable landscape character.

Initial thinking around green belts for NPF4 (DED166)

- 3.125 This paper outlines where some of thinking has come from around consideration of green belts and Policy 8 of NPFs. The key objective from this is to direct planned growth to the most appropriate, sustainable locations whilst protecting and enhancing the character, landscape setting and identity of settlements and providing access to countryside recreation.

Greenbelts Scotland [DED135](#)

- 3.126 A council development plan may designate a green belt around a city or town to support the spatial strategy by:
- directing development to the most appropriate locations and supporting regeneration;
 - protecting and enhancing the character, landscape setting and identity of the settlement; and
 - protecting and providing access to open space.
- 3.127 This dataset provides a polygon layer of green belt designations across Scotland. Whilst not specifically relevant to Dundee, this dataset assists in understanding other greenbelt designations and why they are in existence. This is helpful in understanding their relevance to Dundee.

Framework for Nature Networks in Scotland – Draft [DED125](#)

- 3.128 This framework aims to catalyse the urgent and transformative action needed across Scotland to implement Nature Networks that help halt and reverse biodiversity loss. It promotes the basic principles which associated action and delivery, at all levels, should be founded upon. The focus is on ensuring a deliver for a nature-rich future.

Summary of Stakeholder Engagement

Pre Topic Paper Consultation

3.129 The below initial stakeholder working group was developed through internal and external individuals with specific interest in the thematic area of Biodiversity, Natural Places, Trees and Soils. The initial stakeholder working group was restricted to internal Dundee City Council representatives and external contacts within Key Agency group topic experts. These topic experts have assisted in developing a robust evidence base for the topic paper grouping.

Internal

- DCC Environment (Greenspace)
- DCC Sustainability and Climate Change

External

- NatureScot
- SEPA
- Scottish Water
- Historic Environment Scotland

Topic Paper Consultation

3.130 The Biodiversity, Natural Places, Trees and Soils Topic Paper (DER00) was published for consultation between 24 April 2024 to 31 May 2024 and has formed the basis for the 'Summary of Evidence'. The following table summarises the comments received along with the Dundee City Council (DCC) response.

Post Topic Paper Consultation

3.131 Formal responses to the topic paper consultation were assessed and appropriate changes have been incorporated into the Summary of Evidence. Where consultees disputed any of the submitted evidence, resolution email correspondence was conducted to justify our methodology/ position, or to confirm amendments/ additions in alignment with comments.

Engagement Summary Table

3.132 The following table identifies engagement with stakeholders, from the topic paper consultation period onwards, including summary comments and Dundee City Council's responses. Comments are only provided where contributions from stakeholders led to amendments or additions to the evidence base. Where formal disputes could not be resolved through further engagement they are identified in the table and then further detail is provided within the 'Statements of Agreement / Dispute' section.

Stakeholder	Summary of Comments & DCC Response
Private Individual (STA040)	In agreement with the evidence. DCC Response: Comments noted, no further contact required.
Private Individual (STA008)	Respondent noted that wildlife is also found in private gardens, road embankments and unused brownfield sites. Those have not been included in the plan. DCC Response: Contacted by email to clarify LBAP review and next stages of LDP process.
NatureScot (STA032)	Agree broadly with the evidence presented. Requested additional datasets to be included. Requested

		consideration of Monifieth Bay SSSI and an amendment to show the Tay Estuary as part of the Firth of Tay and Eden Estuary SAC/SPA but not a SSSI. DCC Response: Comments incorporated into Schedule 3, verbal confirmation of this at NatureScot/DCC information sharing meeting on 22/10/24.	
	Historic Environment Scotland (STA004)	In agreement with the evidence. DCC Response: Comments noted, no further contact required.	
	Private Individual (STA007)	In agreement with the evidence. DCC Response: Comments noted, no further contact required.	
	Friends of the Earth Tayside (STA005)	Raised issues regarding the extent of the information and data referred to in the Topic Paper. Provided some further technical information and date for consideration within the Topic Paper. Expressed some concern around the robustness of the document and the stakeholder group. DCC Response: Email response provided. Advised that the NBN atlas provides the UK's largest collection of biodiversity data from reputable sources such as local wildlife organisations and government agencies and will therefore continue to be included in the Evidence List for this topic paper. Noted that it is recognised that the quality and quantity of data depends on how active contributors have been in documenting species and there are gaps for certain species and habitats in Dundee. Also noted that a lack of resources is a factor, but funding is being sought by Greenspace Officers to support further biodiversity studies. Highlighted that NPF4 Policy 3 (Biodiversity) requires developments to "contribute to the enhancement of biodiversity, including by restoring degraded habitats and avoiding harm to protected species." Noted that NPF4 also highlights that decision-making must be "based on high-quality, up-to-date evidence" to deliver climate resilience and nature-based solutions. Planning applications in Dundee must demonstrate compliance with these requirements as NPF4 is part of the statutory development plan. Advised that the Biodiversity Action Plan 2020-2030 includes data about the different types of grassland found in Dundee and their biodiversity value. This data will likely be updated in the review of the Biodiversity Action Plan (scheduled for publication in late 2025) and also in the ongoing review of the city's Open Space Strategy. Noted that comments received on mowing, managing grasslands, fallen tree removal, and other maintenance concerns have been shared with Greenspace Officer colleagues who will	

		be leading the review of the Local Biodiversity Action Plan 2020-2030. Noted that the topic papers use a template for presenting information which is provided by the Scottish Government. In line with their Local Development Planning guidance, links to publicly available evidence have been provided. The Implications for Proposed Plan section on page 29 outlines how evidence may inform the Proposed Plan, with further engagement on site-specific matters at the Proposed Plan stage. More details on the Local Development Plan (LDP) review process can be found here: Dundee Local Development Plan Review Dundee City Council Advised that efforts to improve Dundee's biological records through collaboration with the North East Scotland Biological Records Centre were unsuccessful due to funding limitations including the cutting of nature restoration funding. However, the Evidence Report establishes a baseline by assessing existing data and identifying future issues for the LDP. National datasets, such as the Land Capability Map for Agriculture (James Hutton Institute) and National Soils Maps, have been included for local context. The James Hutton Institute's "urban area" classification reflects areas primarily developed for non-agricultural uses, which precludes assessing soil quality or agricultural potential within those zones. Advised that an updated Forestry and Woodland Strategy is also in preparation. This will integrate inventories like the Native Woodland Survey of Scotland, the Ancient Woodland Inventory, and Tree Protection Orders to identify areas of high conservation value. These resources will help shape sustainable land use and biodiversity planning in Dundee.	
	NHS Tayside (STA035)	In agreement with the evidence. DCC Response: Comments noted, no further contact required.	
	Scottish Wildlife Trust Angus and Dundee Local Group (STA013)	Praised DCC for work on the Topic Paper. Raised issues regarding the extent of the information and data referred to in the Topic Paper. Provided some further technical information and data for consideration within the Topic Paper, including pollinator banks. DCC Response: Email response provided: Recognised that monitoring of the Biodiversity Action Plan has been limited due to resource constraints, with the cutting of nature restoration funding being a significant factor. However, ongoing work including the "Hello Dundee" and "Urban Releaf" projects are helping to spread awareness of naturalizing amenity grassland initiatives and funding is being sought by	

	Greenspace Officers to support further biodiversity studies in anticipation of the Biodiversity Action Plan review scheduled for late 2025. Dundee City Council has explored partnering with The Scottish Invasive Species Initiative but unfortunately their project area does not include the Dundee urban area due to funding constraints. Comments on pollinator banks have been shared with Greenspace Officer colleagues for their information.
Homes for Scotland (STA047)	Dispute as noted below
Dundee Civic Trust (STA017)	Dispute as noted below
Scottish Wildlife Trust Angus and Dundee Local Group (STA013)	<i>(Second entry from Scottish Wildlife Trust Angus and Dundee Local Group – see comments above)</i>
Scottish Environment Protection Agency (SEPA)	Advised to add key evidence sources relating to the river network and other water environment features such as wetlands, as per SEPA's provided resource pack. These included the geomorphic risk layer, riparian vegetation planting opportunity layer and flood maps. DCC Response: All comments addressed and recommended evidence sources included.

Summary of Implications for the Proposed Plan

Policy 3 – Biodiversity

- 3.133 Climate change is a direct driver of biodiversity loss in Dundee, and this will need to be addressed in the new Local Development Plan. The range of different types of habitat within Dundee's greenspaces, such as woodland, grassland, beach and wetland, means that we have a high level of biodiversity which must be protected and enhanced to reduce and mitigate against the effects of climate change.
- 3.134 As the climate changes, species will need opportunities to colonise areas with more suitable conditions. To achieve this within Dundee's urban fabric, appropriate routes and areas of habitat are imperative via a nature network. Working with new Scottish Government and NatureScot guidance, encouraging and facilitating high quality, evidence-based design will be crucial to achieving this.
- 3.135 One of the main constraints already identified is that Dundee is a small and very urban local authority. The opportunities for creating new habitats are therefore limited. National Planning Framework 4 (NPF4) sets out how planning authorities and developers can move towards sustainable development and long-term management and maintenance of habitats. The Local Development Plan may include specific site briefs to identify particular opportunities to enhance biodiversity.
- 3.136 Moving forward to the Proposed Plan, it will be important to review any new tools, data and guidance on biodiversity protection, enhancement, monitoring and mitigation, for example a biodiversity metric framework. Taking account of the evidence set out above and local priorities will be key to ensuring that biodiversity objectives link to other strategic objectives and overall place-making strategy, for example this could be health, flood risk management, active travel and climate emergency ambitions.
- 3.137 Forthcoming data on existing habitats, ecological connections, nature networks and biodiversity value will inform the spatial strategy, policy direction and development standards.

Policy 4 – Natural Places

3.138 Preserving natural landscapes can yield numerous benefits and bolster the quality and character of our surroundings. This includes enhancing urban design, fostering climate regulation through natural cooling and heating processes, and establishing blue-green infrastructure that contributes to the overall appeal of a place. Natural areas play a crucial role in conserving habitats that hold ecological and cultural significance. Examples include ancient woodlands, wetlands, and rivers, all of which serve as invaluable resources for biodiversity and wildlife. These sites are earmarked for protection at various levels, spanning international, national, and local designations, underscoring their importance in maintaining ecological balance and preserving our natural heritage.

3.139 The proposed plan will need to identify all internationally, nationally, regionally and locally important natural assets from the data sources set out above and integrate these into the spatial strategy and land use allocations. Connectivity between natural areas will need to be considered including protecting and maintaining nature networks that support biodiversity. Policies and assessment criteria will likely be needed to ensure development does not adversely impact natural assets.

Policy 5 – Soils

3.140 Soil is a finite resource and even within urban areas the resource necessitates careful management and protection. Soil can assist in managing impacts of climate change in cities like Dundee, in so far as it can offer drainage and permeable effects. It is also often reclaimed through brownfield redevelopment and can be used for landscaping and acoustic purposes. Soil and vegetation surrounding it also offer important biodiversity and habitat aspects for animals and birds. These remain important considerations for inner city Dundee.

3.141 From the maps outlined above, it is evident that Dundee's periphery benefits from areas of good quality soils, including soils classified as land capable for agriculture and prime agricultural land.

3.142 For the Proposed Plan, it may be that a standalone policy on soils is not required due to the existing NPF4 policy and the intention not to replicate this, however the issues should be an inherent consideration within other policies on the environment, brownfield land, biodiversity and climate change.

3.143 NPF4 states the requirement to minimise disturbance to soils from development, which will be an important policy consideration in Dundee.

3.144 Questions for the Proposed Plan:

- What is the role of Dundee's soils in contributing to greenhouse gas reductions, food production, biodiversity, flood regulation, water availability and water quality?
- How do we apply this knowledge we have about Dundee's soils to maximise soil protection and re-use in an urban area?
- How can we best use nature-based solutions to protect Dundee's soils and achieve sustainable soil management in the city?
- How can we balance the need for economic growth and housing requirements with protection of soils/the natural environment?

Policy 6 – Forestry, Woodland and Trees

3.145 Dundee benefits from significant woodland areas particularly in the north and east of the City, areas of woodland that are of cultural significance, community woodland on the urban edge, significant tree belts and corridors through to smaller groups or single trees including garden and street trees. Green infrastructure includes individual elements such as trees and woodlands in urban areas. Trees and urban woodland stretches can make a significant contribution to reinforcing green networks, reducing flood risk, reclamation of derelict land and temporary screening of vacant sites as well as defining key points and gateways in the City.

3.146 Going forward, and in light of biodiversity and environmental requirements of NPF4 it will also be important to consider the environmental benefits of urban woodland resources in Dundee. Of specific

note will be protecting and enhancing associated biodiversity value of existing woodland resources and new and developing woodland stretches across the city.

3.147 In a number of NPF4 policies, including in Policy 6 Forestry, Woodland and Trees, the protection and enhancement of ecological connectivity and natural networks is identified as a key aim. Development has an important role in this through protecting existing networks and in expanding and enhancing these networks. Moving forward to the Proposed Plan, it will be important to review any new tools and guidance on the identification and mapping of nature networks. Also, to use the existing mapping sources identified to ensure that greater weight is given to development that would develop individual woodlands and potential for connectivity between them.

Policy 8 - Greenbelts

3.148 Dundee does not currently have a Green belt designation. Due to the density and boundaries of Dundee, it may be that a Green belt is not considered necessary or appropriate. However, the data sources and background information above emphasise that whilst a Green belt may not be appropriate for everywhere, this is not just important for nature conservation alone. Green infrastructure and networks are equally important in considering open land and green corridors which can potentially allow for better connectivity between places and sites. It is therefore likely that existing Dundee Local Development Plan 2019 Policy 28: Protecting and Enhancing the Dundee Green Network will be carried forward into the next LDP in some form. This will require to be further developed from the data and sources outlined above and new and updated requirements of NPF4.

3.149 Green belts and/ or green infrastructure in other forms are important for climate change and can reduce air pollution and mitigate against flooding. Net zero ambitions are clear within NPF4. Through considerations of Green belts/ green infrastructure there will be a direct link with other policy considerations around active travel, directing development to brownfield sites and vacant and derelict land and the re-use of existing buildings.

Statements of Agreement / Dispute

Statements of Agreement

3.150 As outlined within the Summary of Stakeholder Engagement, a significant level of engagement was carried out with multiple stakeholders during pre-consultation, consultation, and post-consultation of the topic paper. The following organisations agree with the evidence base presented:

- NatureScot (STA032)
- Historic Environment Scotland (STA004)
- Friends of the Earth Tayside (STA005)
- NHS Tayside (STA035)
- Scottish Wildlife Trust Angus and Dundee Local Group (STA013)

Statements of Dispute

3.151 The Topic Paper consultation has highlighted the following areas of dispute. Dundee City Council provided an opportunity to comment on the Biodiversity, Natural Places, Trees and Soils Topic Paper. The Council carefully considered all issues raised and responded to the representations to confirm any amendments and clarify key points. This was constructive in reaching agreement on the vast majority of comments. The remainder of this section will discuss the formal disputes that will be moving forward to Gate Check stage.

3.152 The nature of each formal dispute and the final position is as follows:

Homes for Scotland:

1. HFS would dispute locally important natural assets becoming barriers to development.
2. HFS is concerned about the potential for inconsistent Local Development Plan (LDP) policies across different regions.

3. HFS stresses the importance of considering marketability and deliverability in the site selection process.
 4. While HFS supports the protection and enhancement of woodlands, they highlight the need for a balanced approach that also considers the socio-economic benefits of development.
- 3.153 **DCC Response:** To confirm, all Dundee Local Development Plan policy development will be in line with National Planning Framework 4. The Schedule states that 'Policies and assessment criteria will likely be needed to ensure development does not adversely impact natural assets.' In light of Homes for Scotland comments, additional wording has been added in front of this statement noting that 'Whilst it is noted that the delivery of new development is important and will be encouraged this will be balanced with consideration of maintaining ecological balance and preserving Dundee's natural heritage.'
- 3.154 Homes for Scotland comments relating to site selection have been addressed in the Schedule Quality Homes and Site Assessment Methodology (009)
- 3.155 **Dundee Civic Trust:** Sought further data collection and inclusion in the Evidence Report including naturalised grasslands, biodiversity value in cemeteries, pollinator banks, soil quality data and mapping of historic rivers and streams. Suggested additional Locally Important Nature Conservation Sites (LINCS) for consideration. Requested updating the Local Biodiversity Action Plan to include more areas of biodiversity within the city for monitoring and LINC candidacy. Requested targets for quantitative increase in tree cover and questioned accuracy of James Hutton Institute categorisation of "Urban" land.
- 3.156 **DCC Response** The Council will review Local Nature Conservation Sites (LINCS) with advisory partners as part of the LDP review. Existing LINCS will be assessed to ensure they remain important for the habitats, species, and geodiversity features for which they were designated. During the call for sites stage in early 2026, potential new LINCS may also be identified. Further details on the LDP review process can be found here: <https://www.dundee.gov.uk/service-area/city-development/localdevelopment-plan/dundee-local-development-plan-review>. LINCS are designated using specific criteria, and their identification does not imply additional maintenance responsibilities—many LINCS are not maintained. Some biodiversity, historic rivers, and soil datasets are absent due to limited resources for the intensive surveys required.
- 3.157 The Dundee Biodiversity Action Plan 2020-30 addresses some of these issues, with a review planned for summer 2026. The upcoming Open Space Strategy will audit greenspaces, including cemeteries, to assess current and future needs.
- 3.158 The 27-mile cycleway and footway is noted in the topic paper as part of the Green Network 2016. This will be updated to reflect its actual length of 24 miles, acknowledging that parts are on-road rather than dedicated paths.
- 3.159 An updated Forestry and Woodland Strategy is in progress, incorporating inventories such as the Native Woodland Survey and Tree Protection Orders to identify high-value conservation areas. While a complete tree cover dataset for Dundee is unavailable, monitoring will continue.
- 3.160 The James Hutton Institute's Land Capability for Agriculture maps classify urban areas as developed for non-agricultural uses, excluding them from soil quality or agricultural potential assessments.
- 3.161 Finally, further evidence on water and flood risk is detailed in the Water Environment, Open Space, and Recreation Topic Paper and work is underway to prepare a map-based Strategic Flood Risk Assessment in line with SEPA's guidance.

Water Environment, Open Space, Play and Sport (004)

Issue: Topic / Place	Water Environment, Open Space, Play and Sport (DER004)
Information required by the Act regarding the issue addressed in this section	Policy 20: Blue and Green Infrastructure Section 15 (5) • the principal physical, social, and environmental characteristics of the district; and • the principal purposes for which the land is used. Regulation 9 Have regard to: • any open space strategy. Policy 21: Play, Recreation and Sport Section 16D(1) • a planning authority must assess the sufficiency of play opportunities in its area for children in preparing an Evidence Report. The Town and Country Planning (Play Sufficiency Assessment)(Scotland) Regulations 2023 set out the form and content of the Play Sufficiency Assessment (PSA); the persons who must be consulted in preparing the PSA; and the publication of the PSA. Regulation 9 Have regard to: • any open space strategy. Policy 22: Flood Risk and Water Management Section 15(5) • the principal physical and environmental characteristics of the district. Regulation 9 Have regard to: • any river basin management plan; • any flood risk management plan; and • any local flood risk management plan.
Links to Evidence	Policy 20 - Blue and Green Infrastructure • National Planning Framework (DED201) • Dundee Local Development Plan (LDP) 2019 (DED088) • Water-Resilient Places (DED307) • The Third State of Scotland's Greenspace Report (DED289) • The Dundee Green Network (DED083) • Dundee Core Paths Plan (DED043) • Dundee Public Open Space Strategy 2008-2011 (DED097) • Developer Contributions Supplementary Guidance (DED053) • Dundee Local Biodiversity Action Plan 2020-2030 (DED064)

- Dundee Biodiversity Duty Report 2021-2023 ([DED065](#))
- St Leonards Park Regeneration ([DED326](#))
- Greenspace map | Greenspace Scotland ([DED137](#))
- Local Strategy Dundee 2020 ([DED182](#))
- Dundee Food Growing Space Map ([DED081](#))
- Bathing Waters | Broughty Ferry Results ([DED020](#))
- St Leonards Park Regeneration Strategy ([DED305](#))
- Recommended Riparian Corridor Layer ([DED242](#))
- Geomorphic Risk Layer ([DED131](#))
- Riparian Vegetation Planting Opportunities Layer ([DED248](#))
- Water Classification Hub ([DED304](#))

Policy 21: Play, Recreation and Sport

- National Planning Framework 4 ([DED201](#))
- Active Scotland Outcomes Framework ([DED010](#))
- Scottish Index of Multiple Deprivation ([DED330](#))
- Place and Wellbeing Outcomes ([DED224](#))
- A More Active Scotland: Scotland's Physical Activity Delivery Plan ([DED007](#))
- Dundee Local Development Plan (LDP) 2019 ([DED088](#))
- Dundee's Play Sufficiency Assessment ([DED107](#))
- Dundee Sports Pitch Strategy ([DED099](#))
- Dundee Open Space Strategy ([DED093](#))
- Dundee Strategic Forest Plan 2015-2025 ([DED082](#))
- Dundee Place Standard Survey ([DED229](#))
- Dundee Place Standard 2024 Results ([DED 227](#))
- Dundee Walking and Cycling Index 2023 ([DED104](#))
- Dundee Partnership Physical Activity Strategy ([DED095](#))
- SportScotland Facilities Database ([DED288](#))
- Community Sports Hubs ([DED037](#))
- Dundee Core Paths Plan ([DED043](#))

Policy 22: Flood Risk and Water Management

- National Planning Framework 4 ([DED201](#))
- Dundee Local Development Plan 2019 ([DED088](#))
- Scottish Government Draft Flood Resilience Strategy ([DED122](#))
- Dundee Strategic Flood Risk Assessment 2025 ([DED271](#))
- Guidance for Planning Authorities on Strategic Flood Risk Assessment- SEPA ([DED138](#))
- Surface Water and Drainage Planning Guidance 2020 ([DED341](#))
- Surface Water Drainage Design and Flood Risk Assessment Requirements - Technical Guidance (2020) ([DED342](#))
- River Basin Management Plan for Scotland 2021-2027 ([DED249](#))
- Dighty Restoration Feasibility Study ([DED056](#))
- Tay Estuary and Montrose Basin Flood Risk Management Plan 2022-2028 ([DED285](#))
- Position Statement: Elevated buildings in areas of flood risk ([DED234](#))
- Climate Change Allowances for Flood Risk Assessment in Land Use Planning ([DED029](#))
- Flood Risk Standing Advice for Planning Authorities ([DED123](#))
- Water Scarcity ([DED306](#))

- Scottish Water Surface Water Policy ([DED274](#))
- Dundee Climate Change Risk and Vulnerability Assessment (2024) ([DED074](#))
- CivTech 8.3 Challenge- Nature Networks Corridors ([DED027](#))
- Water Resilient Dundee ([DED307](#))
- SEPA Flood Maps ([DED279](#))
- SEPA Future Flood Maps ([DED347](#))
- Recommended Riparian Corridor Layer ([DED242](#))
- Riparian Vegetation Planting Opportunities Layer ([DED248](#))
- Water Classification Hub ([DED304](#))
- RBMP3 Water Environment Hub ([DED241](#))
- Geomorphic Risk Layer ([DED131](#))
- Dundee Projects (Scottish Water Projects within Dundee City boundary) ([DED096](#))
- Hatton PFI Combined Sewers ([DED145](#))
- Hatton PFI Foul Sewers ([DED146](#))
- Hatton PFI Storm Sewers ([DED147](#))
- Dundee Gullies within Depression Watersheds ([DED084](#))
- Hatton Opportunity Mapping ([DED144](#))
- Storm Water Management Opportunities ([DED269](#))
- Flooding Media Map ([DED124](#))
- Dundee Strategic Flow Paths, Green and Grey Space, and Large Roofs ([DED100](#))
- Dynamic Coast ([DED108](#))
- NatureScot Spatial Data Hub, Dynamic Coast ([DED209](#))
- Drought Risk Assessment Tool ([DED063](#))

Summary of Evidence

Policy 20 – Blue and Green Infrastructure

National Planning Framework 4 (NPF4) [DED201](#)

- 4.1 The policy seeks to protect our existing blue and green infrastructure, by supporting development that protect the overall integrity of these environmental assets. Planning authorities should support development proposals that incorporate new or enhanced blue and/or green infrastructure.
- 4.2 The implications on development proposals are that they are required to consider blue and green infrastructure as an integral part of design and development process, for multiple functions including climate mitigation, nature restoration, biodiversity enhancement, flood prevention and water management. Resulting in the development of accessible, high-quality blue, green and open spaces.
- 4.3 Within NPF4, blue and green infrastructure is outlined as a priority for both Regional Spatial Strategies as well as Local Development Plans. The greening of the built environment, including former industrial areas, is a long-held ambition that we now need to expedite to significantly reduce emissions, adapt to the future impacts of climate change and tackle biodiversity loss.
- 4.4 NPF4 states that “investment in green infrastructure will support urban sustainability, help to restore biodiversity, contribute to our overall targets for reducing emissions and improve health and wellbeing. There is much that we have already learned from past work, for example initiatives to naturalise former mining features, reclaiming canals as a cultural heritage and natural asset, and extensive woodland creation. Wider woodland expansion across more urban areas could make a significant contribution to improving air quality and quality of life by reducing pollution, managing water and cooling urban environments. Blue and green networks can help to deliver compact and liveable cities.”

Dundee Local Development Plan 2019 [DED088](#)

- 4.5 Dundee's 2019 Local Development Plan (LDP) has a broad range of policies that directly relate to blue and green infrastructure.
- 4.6 Policy 1: High Quality Design and Placemaking states that design and siting of development should respect the character and amenity of the place, create a sense of community and identity, enhance connectivity and incorporate creative approaches to urban design, landscaping and green infrastructure, appropriate to the local context and the scale and nature of the development.
- 4.7 Policy 20: Funding of On and Off Site Infrastructure Provision principles guide the requirement for contributions and the preparation of the Developer Contributions Supplementary Guidance are developer contributions will be sought where a need for new or improved services, facilities or infrastructure has been demonstrated that relates directly to the requirements or impacts of a proposed development.
- 4.8 Policy 28: Protecting and Enhancing the Dundee Green Network states development proposals shall protect and enhance the Dundee Green Network by ensuring that development will not lead to the fragmentation of the existing network of green infrastructure.
- 4.9 New development should contribute to the Dundee Green Network where appropriate and as determined by the council, through the integration of green infrastructure in masterplans or development frameworks and the creation and/or improvement of green infrastructure within development sites or in the local area.
- 4.10 Policy 29: Outdoor Access and the Dundee Green Network will seek to safeguard, improve and extend the network of outdoor access routes, with particular emphasis on the Core Path network and routes identified in the Dundee Cycling Strategy which support the development of the Dundee Green Network.
- 4.11 Policy 30: Green Infrastructure Maintenance will apply planning conditions or Section 75 obligations to planning permissions to make suitable provision for the long-term maintenance of green infrastructure (including open space and landscaping associated with Sustainable Drainage Systems) in new housing developments.
- 4.12 Policy 32: National and International Nature Conservation Designations states that any development proposal that is likely to have a significant effect on the conservation management of the European site must include a Habitats Regulations Appraisal of the implications on the conservation objectives of the designations.
- 4.13 Policy 33: Local Nature Conservation Designations Development states that development which could have a significant effect on the conservation interests associated with Local Nature Reserves, Locally Important Nature Conservation Sites or Wildlife Corridors will only be permitted where it satisfies 3 criteria.
- 4.14 Policy 35: Trees and Urban Woodland state the Council will support the establishment and enhancement of woodland, tree belts and corridors. New development must ensure the survival of woodland, hedgerows and individual trees, especially healthy mature trees, of nature conservation or landscape value through sensitive site layout both during and after construction, unless removal has been approved in advance by the council.
- 4.15 Policy 37: Sustainable Drainage Systems states that surface water discharging to the water environment from new development must be treated by a Sustainable Drainage System (SuDS) except for single houses or where discharge is to coastal waters. Proposals will be encouraged to adopt an ecological approach to surface water management, ensure an appropriate level of treatment and exploit opportunities for the system to form an integral part of the Dundee Green Network through habitat creation or enhancement through measures such as the formulation of wetlands or ponds.
- 4.16 Policy 38: Protecting and Improving the Water Environment aims to safeguard and enhance Dundee's water environment in alignment with the Water Framework Directive and Scotland River Basin Management Plan 2 (RBMP). Development proposals must not compromise these objectives, considering impacts such as morphological changes, pollution, and nonnative species invasion. Engineering works that harm the water environment won't be supported, while opportunities for improvement, like de-culverting and riparian buffer zones, are encouraged. The Dundee Water Environment and Strategic Flood Risk Assessment 2016 guides local interpretation and mitigation measures on a site-specific basis. When assessing proposals, the Council considers RBMP and the Dundee Assessment, ensuring developments align with water environment protection and improvement goals.

Water Resilient Places [DED307](#)

4.17 The Scottish Government has identified the need to improve how we manage surface water in Scotland. The Scottish Government Water-Resilient Places paper outlines the improvements we can make to surface water management in communities across Scotland by building on existing policy and demonstrating how we work together. It details how surface water is currently managed in Scotland, setting out a vision for the future.

4.18 It concludes with recommendations to improve surface water management and flood resilience in Scotland, to help address the relevant recommendations in the Infrastructure Commission for Scotland's Key Findings Report. Specifically, those focused on climate adaptation, "infrastructure first" and improving regulatory coherence across water provision, flood management and resilience.

The Third State of Scotland's Greenspace Report [DED289](#)

4.19 The Third State of Scotland's Greenspace Report, published in 2018 is a comprehensive document that statistically measures the quantity, quality and use of greenspace across Scotland, as well as also outlining how green infrastructure can be utilised to create places where people want to live, work and visit. Data on greenspace can provide a powerful tool for planning and delivering on local quality of life issues. The report demonstrates the systemic effect that improving greenspaces can positively impact our broader communities.



Figure 4.1 "What Can greenspace Do?" Third State of Scotland's Greenspace Report ([DED289](#))

4.20 The report details that Dundee City covers 6300 hectares, with 41% of this being greenspace, which is the highest percentage of publicly accessible greenspace of any city in Scotland. Adding private gardens increases this figure to 62%.

The Dundee Green Network [DED083](#)

4.21 The Dundee Green Network is a non-statutory planning guidance that promotes the provision of green infrastructure in and around Dundee.

4.22 The document details that Dundee is a city which benefits from more urban green space per head of population than anywhere in the UK. The network of green infrastructure in the city includes 59 parks covering 4000 acres (this includes cemeteries and allotments) and a 27-mile footpath/ cycleway circumnavigating internationally important nature sites on the inner reaches of the Tay Estuary and locally important green and blue spaces enjoyed by both residents and visitors alike.

4.23 It is outlined that new developments offer an opportunity for the Council to work with its partners to strengthen and extend the network of green infrastructure. It is important to ensure that as the City develops and embraces change, people living, working, or visiting the City continue to have access to quality, connected, multifunctional and well managed green infrastructure.

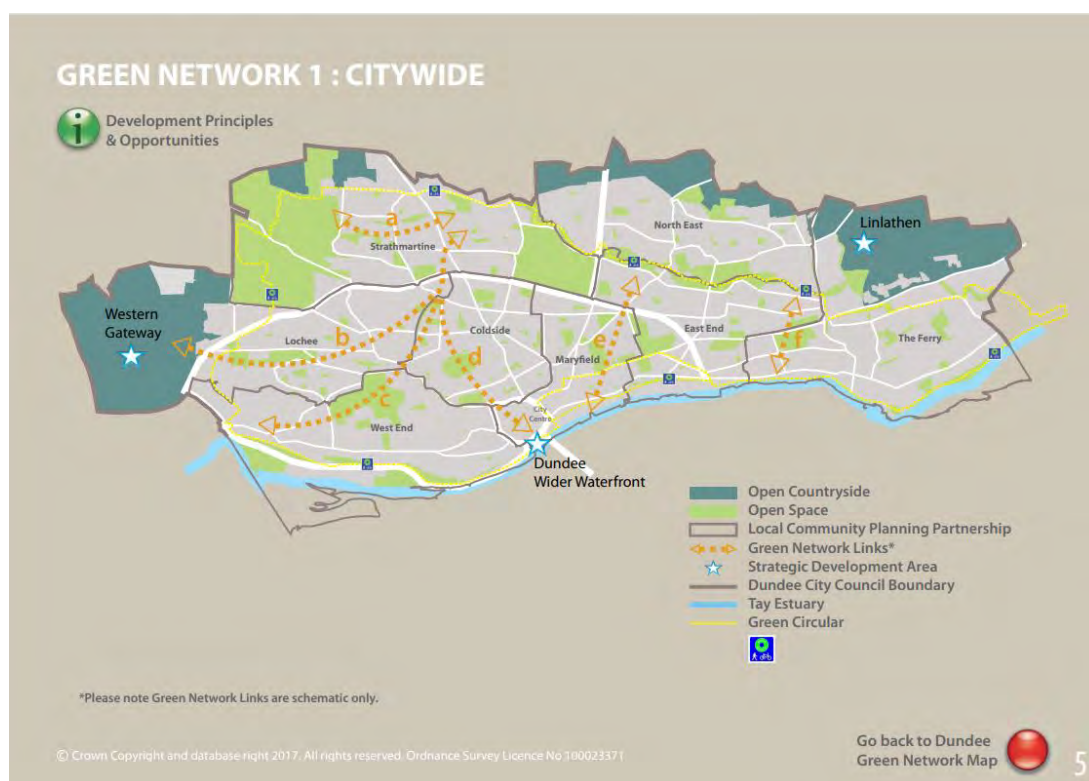


Figure 4.2 'Green Network 1: Citywide' Dundee Green Network

Dundee Core Paths Plan (amended 2020 & 2023) [DED043](#)

4.24 The Core Path Plan is used to help promote outdoor access on a network of routes throughout the city. The Core Paths Plan helps to deliver a number of outcomes from other Council Plans and Strategies such as the Outdoor Access Strategy, the Public Open Space Strategy, Local Community Plans, Dundee's Green Network and Dundee's Physical Activity Strategy. These outcomes include promoting access to greenspaces and services and encouraging physical activity through sustainable and active travel.

4.25 Core Paths form part of the Dundee Green Network, which includes parks and open spaces. The provision of green infrastructure in and around towns and cities is now widely recognised as contributing towards creating places that function well economically and help people to live happy and healthy lives. Connecting green infrastructure components such as street trees, parks, open space, watercourses, woodland, meadows and walking and cycling routes into a multi-functional green network helps to further improve the quality of life within an area and create sustainable communities. Core Paths in Dundee also link to neighbouring authority areas offering an opportunity to connect beyond the city.

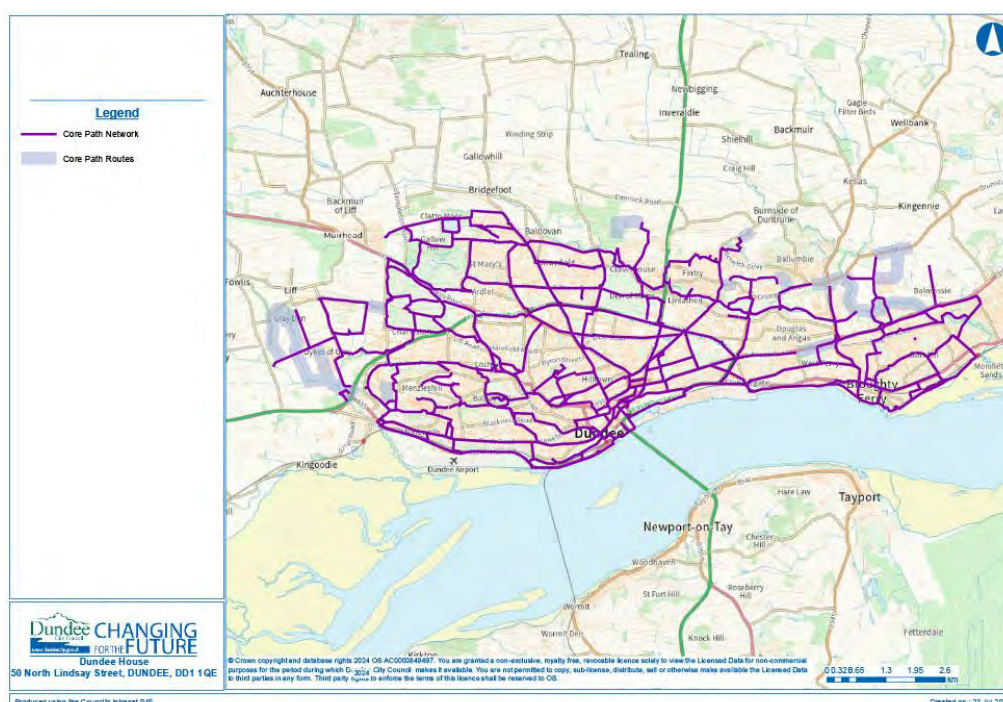


Figure 4.3 City of Dundee Core Paths

Dundee Public Open Space Strategy 2008 & 2026 [DED097](#)

4.26 The last Public Open Space Strategy was produced in 2008. In late 2023, Dundee City Council awarded Ironside Farrar with a contract to undertake an Open Space Audit to inform an update to the city's Open Space Strategy. The audit has assessed and mapped the quantity, quality and accessibility of existing open space provision in the city, using Green Flag assessment criteria and Ordnance Survey data. The audit will be used by the planning authority and Council's Greenspace team to inform a refreshed Open Space Strategy (OSS), which will establish a strategic framework outlining policies and proposals for the development, maintenance, and use of green and blue infrastructure in the city, including an assessment of future needs. Parks will be categorised into City, Neighbourhood and Local Parks based on an agreed set of criteria.

Developer Contributions Supplementary Guidance [DED053](#)

4.27 Dundee City Council has set out its vision for development through the Dundee Local Development Plan 2019. Green infrastructure and green networks were outlined as infrastructure that developer contributions are most likely to be sought for. Two green policies were outlined,

- Policy 1 – High Quality Design and Placemaking: refers to enhancing connectivity and incorporating creative approaches to urban design, landscaping and green infrastructure.
- Policy 28 – Protecting and Enhancing the Dundee Green Network: requires New development should contribute to the Dundee Green Network where appropriate

4.28 The Developer Contributions Supplementary Guidance states that “All development should contribute to the Dundee Green Network where appropriate and as determined by the Council, through the integration of green infrastructure in masterplans or development frameworks and the creation and/or improvement of green infrastructure within development sites or in the local area.”

4.29 The current Local Development Plan supports a presumption that new development should contribute to the enhancement and connectivity of open space and habitats, where appropriate as part of the wider green network. Developments are encouraged to not only include appropriate open space and links within the site boundaries, but to consider how these will interact with surrounding areas.

4.30 No development should be viewed in isolation, and all will have a duty to contribute to the quality of their local environment by integrating into existing green networks in an appropriate and sensitive manner.

As such it is possible that off-site provision will be necessary to ensure that new development sites connect into the existing green network.

Dundee Local Biodiversity Action Plan 2020-2030 [DED064](#)

4.31 The Dundee Biodiversity Action Plan (LBAP) outlines Dundee City Council's strategy to protect the environments and ecosystems that all living things exist within. Many of these green areas have considerable biodiversity value and contribute greatly to the character of the city. The contribution and multiple benefits provided by these areas, including mental and physical health benefits, ecosystem services, education and community enhancement is widely recognised. Further to these benefits, these systems have the potential to improve Dundee's flood management system.

4.32 The plan separates the wider ecosystem into five individual systems:

- Woodlands
- Water and Wetlands
- Marine and Coastal
- Grasslands
- Urban Green Network

4.33 Below is a brief description detailing these ecosystems in Dundee:

4.34 Woodlands Dundee has many areas of urban woodland, approximately 318 hectares of woodland in Locally Important Nature Conservation Sites (LINCS) and Local Nature Reserve (LNRs). This comprises a mix of semi-natural and plantation woodlands as well as a mix of broadleaved and coniferous trees. Dundee has 238 hectares of ancient woodland which cannot be recreated and, as Scotland only has 2% of land area covered by ancient woodland, these cannot be recreated and must be protected.

4.35 Trees which are deemed by the Council to make a special contribution to the landscape or are threatened with removal or damage may be issued with a Tree Preservation Order (TPO). Trees under these orders require special permission from the Council for any pruning, lopping or felling.

4.36 Water and Wetlands For Scotland, 55.7% of water bodies meet the EU water quality standard of being at either good or high status. (SEPA). The sub basin district for the Tay has around 48% of water bodies meeting these criteria.

4.37 After the River Tay, the Dighty Burn is the most important water course in the city. It runs almost the full length of the city, creating a riparian wildlife corridor that connects many LINCS and greenspaces. There are also many ponds throughout Dundee. These ponds vary in size from the large mill ponds at Trotter Ponds LNR to small Sustainable Urban Drainage System (SuDS) ponds created as part of new developments across the city. A 2018 biodiversity survey identified around 25 hectares of water, swamp and marginal vegetation. This figure only includes LINCS, LNR's and other significant sites in the city and the actual figure is likely to be much higher.

4.38 Marine and Coastal The Firth of Tay Estuary has been described as the least modified of the large east coast estuaries in Scotland. Combined with the Eden Estuary, it forms a mosaic of estuarine and coastal habitats of local, national and international significance. This has led to numerous scientific designations for the habitats here and the flora and fauna that live in them. The two estuaries are designated as Ramsar site for their international importance under the UNESCO Convention (1971).

4.39 Scotland has a large amount of coastline and Scotland has the majority of the UK's sand dunes. A 2018 biodiversity survey identified around 59 hectares of coastal habitat, including intertidal habitats and coastal grassland habitat. In the urban context of Dundee, this is a valuable component of green infrastructure, as well as habitat. Substantial investment has been made within the last 5 years in Dundee's coastal defences, protecting the city from the potential impact of climate change. This has affected a proportion of the dune habitat at Broughty Ferry Esplanade with areas of rock armour / rip rap being installed along the seaward edge of the dune habitat. However, current engineering works are seeking to protect and enhance the remaining natural dunes through further fencing, planting and restricting pedestrian access.

4.40 Grasslands Many different types of grassland are found in Dundee from short amenity grassland in parks and sports pitches to wildflower meadows such as those at Riverside Nature Park (coastal grassland is covered in the Marine and Coast Ecosystem Statement). The 2018 biodiversity survey

identified 287 hectares of different types of grassland in Dundee's LINC's, LNR's and other significant sites. Most of the grassland (63%), in Dundee is amenity grassland. This reflects the urban nature of our local authority which provides amenity spaces such as sports pitches, parks and urban greenspace. It also shows a legacy of historic greenspace management where neat and tidy grass was highly desirable.

4.41 Around 16% is semi-improved neutral grassland. This is due to Dundee's past expansion into agricultural land. There are also other areas of more neutral grassland not surveyed, including road verges, which can be of high quality and support important plant species such as orchids and other wildflowers.

Greenspace map | Greenspace Scotland [DED137](#)

4.42 Greenspace Scotland in partnership with Ordnance Survey (OS) publish up to date green space maps that are updated every six months. These are available via both an OS interactive map ([OS Maps](#)) as well as publicly available layers across other mapping systems including GIS (attached below).

4.43 The Greenspace maps include parks, public gardens, playing fields, sports areas, play spaces, allotments and community gardens.

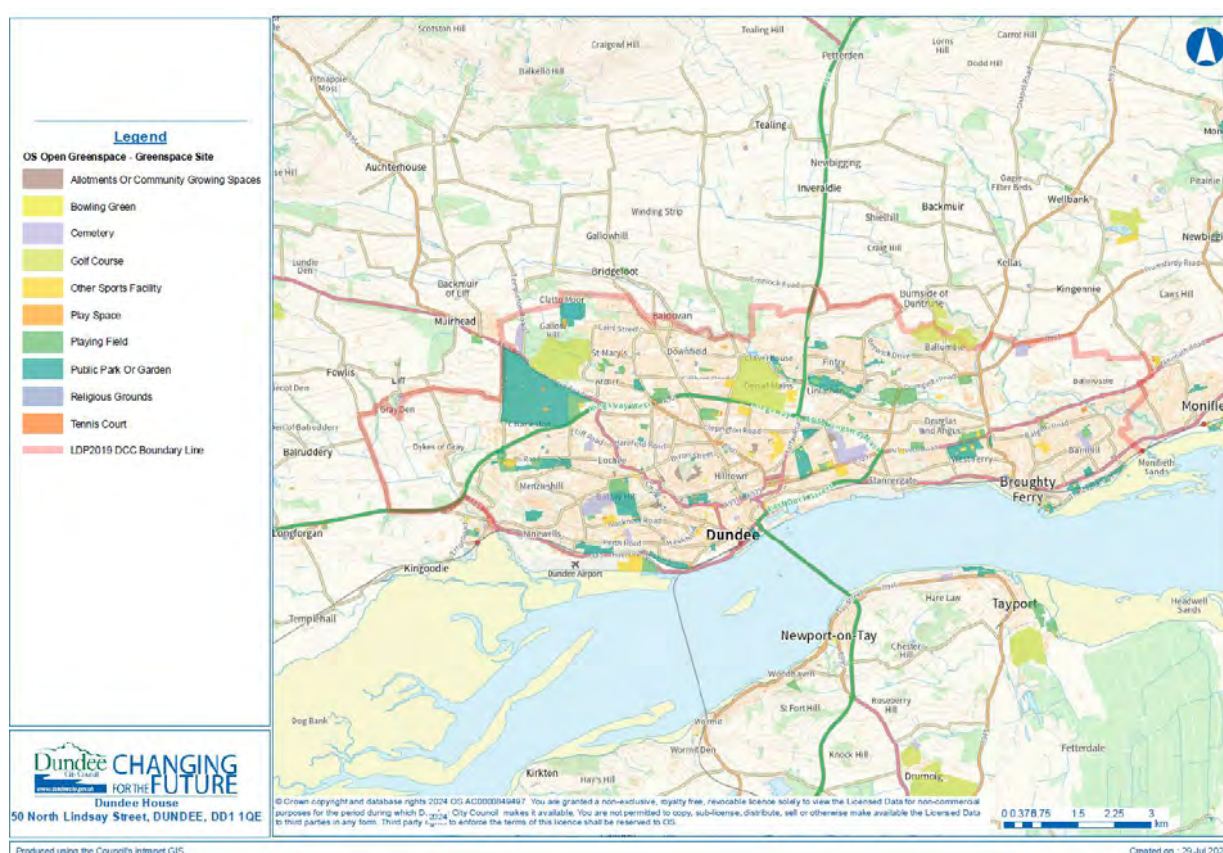


Figure 4.4 'Dundee Greenspace GIS Layer' Greenspace Scotland

Local Food Growing Strategy Dundee 2020 [DED182](#)

4.44 The Local Food Growing Strategy Dundee 2020 outlines Dundee's ambitions to build upon an enviable resource of community growing spaces and allotments, working with communities, local people and organisations to enable them to access 'grow your own' opportunities, whilst recognising the value of such growing spaces in reducing food insecurity. With aims:

- To consolidate and support existing growing spaces
- To work with partners and local people to develop existing growing spaces
- To work with partners and local people to share skills and resources
- To work with partners and local people to identify and develop additional spaces for growing

- To work with partners and communities to develop new local growing spaces
- To promote good environmental practice within growing spaces
- To support innovative solutions for encouraging grow your own, through development opportunities and existing infrastructure
- To integrate grow your own opportunities into existing strategic plans, processes and structures

4.45 The strategy outlines the significance that a comprehensive food growing strategy. The food growing strategy will help to underpin several strategic priorities and outcomes including Health Care, Wellbeing and Building Stronger Communities. Community Growing was highlighted as a priority by local people in all local wards during a community engagement exercise carried out in the preparation for the City Plan.

4.46 The City Plan for Dundee 2017-2026 aligns the Scottish Government's NPF with local circumstances and promotes the long-standing vision for the city framed around jobs, social inclusion and quality of life. The City Plan sets out 5 strategic priorities:

- Fair Work and Enterprise
- Children and Families
- Health, Care and Wellbeing
- Community Safety and Justice
- Building Stronger Communities

Dundee Food Growing Space Map [DED081](#)

4.47 Below shows Dundee's food growing map, which includes allotments, community gardens, therapy gardens and school gardens.

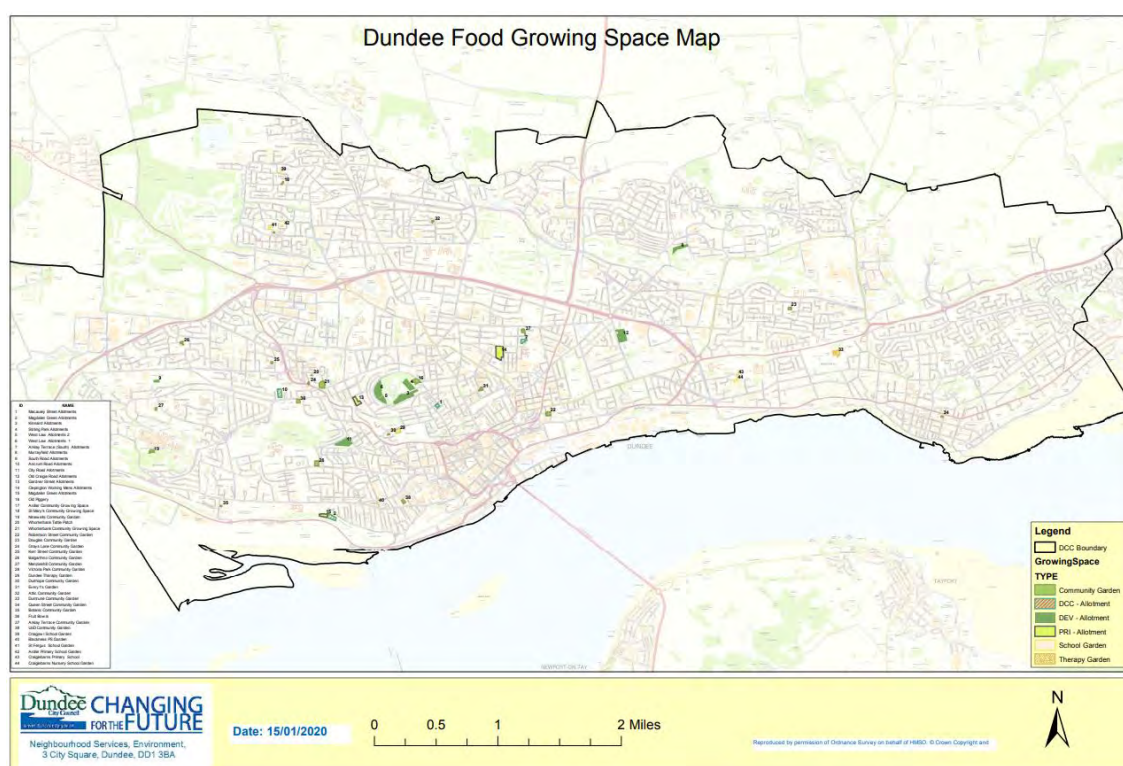


Figure 4.5 Dundee Food Growing Space Map (DED081)

Bathing Waters [DED020](#)

4.48 The Scottish Environment Protection Agency (SEPA) sample water quality weekly, across registered bathing waters. Broughty Ferry is a registered bathing location. The Broughty Ferry bathing location is to the east of the Dundee and accessible via a traffic free path from both the centre of Broughty Ferry and Dundee. It is a 1.5km long sandy beach that is popular with wildlife enthusiasts and swimmers.

Other key data on ‘blue’ aspects of Blue and Green Infrastructure

4.49 Further key datasets relating to delivering the ‘blue’ elements of Policy 20 are available in the below summary of evidence for Policy 22 Flood Risk and Water Management.

Current and future opportunities

4.50 Due to Dundee’s history and environmental landscape, the city has opportunities to utilise existing water courses for surface water management, improving the cities flood resilience whilst enhancing biodiversity and placemaking.

4.51 The St Leonards Park Regeneration Strategy ([DED305](#)) is a part of the wider St. Mary’s Drainage Strategy, in partnership with Scottish Water, NatureScot and Dundee City Council. Plans have been developed to reduce flooding in the Downfield by reinstating the Back Burn (watercourse). The strategy aims to create a sustainable, nature-based drainage solutions for St Leonard Park.

4.52 The St Leonard Park project is the first phase of a storm water drainage strategy for the St Mary’s area of Dundee, developed jointly by Scottish Water and Dundee City Council in consultation with partners such as SEPA and NatureScot. The intervention would reduce the risk of flooding in this area by introducing blue and green infrastructure, allowing surface water to be attenuated naturally.

4.53 The strategy proposes to reinstate the historic Back Burn above ground in an area of greenspace alongside St Leonard Place, which floods regularly during periods of heavy rainfall. The area would be landscaped to allow this water to flow into the Dighty Burn, taking with it any excess surface water. This will then enable Scottish Water to disconnect surface water from the combined sewer, freeing up capacity in the system and significantly reducing the risk of flooding.

4.54 While flood prevention is the driver for these plans, the proposed management of water in greenspaces provides opportunity for multiple benefits for people and nature. Enhancing the park with open water and additional planting will boost biodiversity, providing habitats for a range of insects, birds, mammals and amphibians. The park will also become a more attractive area for play and recreation, as well as encouraging walking, cycling and wheeling, enabling better, healthier access to schools and local amenities.

4.55 The St Marys project has the potential to set a precedent that demonstrates a holistic approach to over-ground surface water management, delivering climate resilience, biodiversity gain, urban functionality, health and well-being, by becoming an exemplar of a water-resilient place.

4.56 Dundee shares boundaries with both Angus Council and Perth & Kinross Council. This provides opportunities for Dundee to connect with blue and green infrastructure beyond the local authorities’ boundaries.

4.57 There are proposed active travel infrastructure projects in Dundee and across bordering authorities. These developments offer opportunities to extend blue and green infrastructure, integrating and expanding nature networks. Fig 6 (TACTRAN) demonstrates infrastructure projects proposed across Dundee’s bordering local authorities Angus and Perth & Kinross.

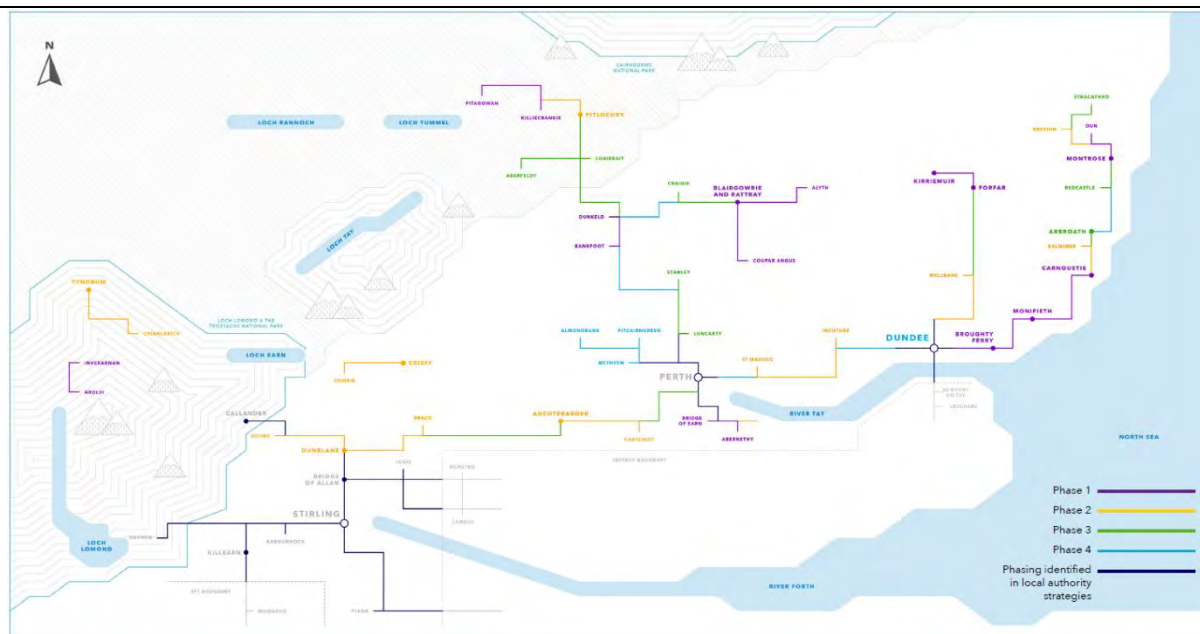


Figure 4.6 : TACTRAN Future Development

Summary of Dundee's Blue and Green Infrastructure

- 4.58 Dundee has some of the highest proportion of blue and green infrastructure in Scotland. The city has specifically high amounts of greenspace, with 41% of its area being publicly accessible open green space, more than any other Scottish city, rising to 62% when private gardens are considered. The Local Biodiversity Action Plan identifies woodlands, wetlands, grasslands, and coastal areas as ecologically important, however, much of the city's grassland remains low in biodiversity due to its amenity function.
- 4.59 Dundee includes a wide variety of Blue Infrastructure, including rivers, burns, ponds, wetlands, and SuDS. Water quality in the Tay sub-basin is below the national average, and legacy engineering such as culverts has limited ecological connectivity. However, innovative projects like the St Mary's Drainage Strategy are looking to set new standards for integrated water management, biodiversity gain, and flood resilience. Coastal assets such as Broughty Ferry beach and dune habitats are significant, although defence works have reduced natural dune areas, with restoration and protection now in progress.
- 4.60 Overall, Dundee's Blue and Green infrastructure is of high quality and in generally good condition. Strengths include exceptional greenspace coverage, international coastal designations, and forward-thinking integration of water management with biodiversity and placemaking. Weaknesses include the ecological limitations of amenity grasslands, below-average water quality, and ongoing pressures on maintenance and funding. The city's trajectory is positive, with opportunities to enhance biodiversity, expand woodland and street trees for climate resilience, restore watercourses, and strengthen cross-boundary connections with neighbouring authorities. Dundee is well positioned to become an exemplar of a water-resilient, biodiverse, and sustainable urban environment.
- 4.61 The upcoming Open Space strategy will help further inform the current quality and condition of Blue and Green infrastructure and advise the proposed plan stage of the Local Development Plan.

Policy 21: Play, Recreation and Sport

National Planning Framework 4 Policy 21 [DED201](#)

- 4.62 Under NPF4 ([DED201](#)) Policy 21, Local Development Plans should identify sites for sports, play and recreation for all ages, based on community needs and assessments. These spaces should enhance and expand existing blue and green infrastructure, considering related policy frameworks (e.g. flood risk management). New provisions should be well-designed, high-quality, accessible, and inclusive.
- 4.63 Development leading to the loss of outdoor sports facilities is generally not supported unless:

- it is ancillary to the principal use of the site as an outdoor sports facility,
- involves only a minor part without affecting overall use,
- provides an equivalent or improved replacement facility,
- there is clear evidence of excess provision.

4.64 Loss of children's play areas is not supported unless there is no ongoing or future demand, or it's replaced with a better quality or more appropriate facility.

4.65 The policy also sets out requirements for development proposals likely to be occupied or used by children and young people, new streets and public realm, and new replacement or improved play/sport provision.

Active Scotland Outcomes Framework [DED010](#)

4.66 The Scottish Government has outlined the ambitions for sport and physical activity in the Active Scotland Outcomes Framework and these are:

- We encourage and enable the inactive to be more active
- We encourage and enable the active to stay active throughout life
- We develop physical confidence and competence from the earliest age
- We improve active infrastructure – people and places
- We support wellbeing and resilience in communities through physical activity and sport
- We improve opportunities to participate, progress and achieve in sport

4.67 These link to a number of the national outcomes that the Government is seeking to achieve, most relevant to sport is that 'We are healthy and active.' The availability of a network of places, of the right quality and capacity to meet the needs of sport, is crucial to deliver these outcomes.

Scottish Index of Multiple Deprivation 2020 [DED330](#)

4.68 The Scottish Index of Multiple Deprivation (SIMD) assesses deprivation levels. The SIMD splits Scotland into 6,976 small areas, called 'data zones', with roughly equal populations. There are 188 SIMD data zones in Dundee, of which 70 are ranked within the 20% most deprived in Scotland. The SIMD 2020v2 shows that 36.6% of people in Dundee City live in a data zone within the 20% most deprived.

4.69 The Scottish Index of Multiple Deprivation (SIMD) includes a health domain that evaluates factors like illness, mortality, and access to healthcare services. 23 of the 188 SIMD data zones are ranked within the top 5% most health-deprived areas in Scotland.

4.70 This data suggests that health inequalities are a pressing issue in Dundee, with certain areas facing severe health deprivation. Data summarised in the "Health and Safety" Topic Paper shows that Dundee's East End, Lochee and Coldside wards have the highest prevalence of people with mental health conditions, physical disabilities, learning disabilities and sensory impairment. These wards also have the highest proportion of residents classified as income deprived.

Place and Wellbeing Outcomes [DED224](#)

4.71 The Place and Wellbeing Outcomes support all sectors to focus decision-making and implementation on a common set of evidenced features that will enable each place to have a positive impact on wellbeing of people and planet while reducing inequality. The Play and Recreation Outcome is as follows: "Everyone can access a range of high quality, safe, well-maintained, accessible places with opportunities for play and recreation to meet the varying needs of different population groups and the community itself."

A More Active Scotland: Scotland's Physical Activity Delivery Plan [DED007](#)

4.72 This strategic document is designed to increase physical activity levels across the country by 2030. The plan underscores the importance of integrating physical activity into local development planning. This includes considering the needs of pedestrians and cyclists in urban design and ensuring that new developments support active lifestyles by providing access to green spaces, parks, and recreational

facilities. Gathering data on current activity levels and understanding barriers to physical activity are important to ensure interventions are effective in promoting physical activity.

Dundee Local Development Plan 2019 [DED088](#)

4.73 The following policies from the current LDP are relevant to this topic:

4.74 **Policy 18: Community Facilities:** New community facilities should be conveniently located for the community they service and should be easily accessible, especially by public transport, walking and cycling. Joint developments with other agencies to create diverse but integrated community facilities are encouraged.

4.75 **Policy 19: Private Day Nurseries:** Private day nurseries must provide an outdoor play space that is attractive, useable, safe, and enjoys a sunny aspect. The play space must be directly accessible from the ground floor.

Dundee's Play Sufficiency Assessment [DED107](#)

4.76 The planning authority conducted a Play Sufficiency Assessment (PSA) as required by the Planning (Scotland) Act 2019. This included an assessment of the quality, quantity, and accessibility of play spaces in the Dundee area. Three primary data sources were used to inform the Dundee PSA. These were a physical assessment of the quality of publicly owned play areas undertaken by the planning team from June to August 2024, and two public consultations on Play Sufficiency and the [Dundee Place Standard Survey](#) ([DED229](#)) which ran from April to the end of August 2024. Additionally, a map-based network analysis assessed gaps in provision by measuring the number of residences within a 5-minute and 10-minute walking time of play parks. Information from other sources, including the Council's Urban ReLeaf project and Open Space Audit 2024 were used to assess informal play opportunities.

4.77 The PSA was approved by the Fair Work, Economic Growth and Infrastructure Committee in September 2025. Mapping outputs will be made available in an interactive online map format on the Dundee City Council Open Data Portal by the end of 2025.

Dundee Sports Pitch Strategy [DED099](#)

4.78 Work has begun on an update to the Dundee Sports Pitch Strategy. The previous strategy covered the period 2011-2016 and was part of a broader initiative to enhance community sports facilities across the city, focusing on both upgrading existing pitches and adding new ones. The strategy is closely linked to the city's Capital Plan for 2021-2026, which outlines significant investments in sports infrastructure. Dundee City Council manages numerous outdoor sports pitches, offering facilities for a wide range of sports like football, Gaelic football, rugby, shinty, and cricket. The council is responsible for the maintenance and booking of these pitches, which are located in various parks and open spaces across Dundee.

Dundee Forestry and Woodland Strategy [DED082](#)

4.79 Work is ongoing on the preparation of Dundee's Forestry and Woodland Strategy, which is anticipated to be finalised by December 2024. Policy connections between woodland assets and opportunities for play, recreation and sport, will be taken into account in the preparation of the Dundee Local Development Plan. Further consideration of the review of the Forest & Woodland Strategy is included in the Topic Paper "Biodiversity, natural places, trees and soils".

Dundee Place Standard Survey [DED229](#)

4.80 The Planning Team created an interactive online survey using the Place Standard Tool to help gain a deeper understanding of the quality of neighbourhoods in Dundee. The Dundee Place Standard Survey included an evaluation of the availability and quality of spaces and opportunities for play and recreation. An overview and key outcomes from the survey is provided under policy 14 Design, Quality and Place. The Place Standard Survey also informed the Dundee Play Sufficiency Assessment, with planning officers assisting a class at Blackness Primary School to complete the exercise.

Dundee Walking and Cycling Index 2023 [DED104](#)

4.81 The Walking and Cycling Index (formerly Bike Life) is the biggest assessment of walking, wheeling and cycling in urban areas in the UK and Ireland. It is delivered by Sustrans in collaboration with 23 cities and urban areas. Each city reports on the progress made towards making walking, wheeling and cycling more attractive, everyday ways to travel.

4.82 In Dundee the number of people walking and wheeling regularly (at least five days a week) has decreased since 2021 (51% down from 54% in 2021). However, 48% of residents want to walk or wheel more and 41% want to cycle more. Therefore, enhancing active travel infrastructure to improve safety and accessibility are key considerations for the development of the spatial strategy of the Proposed Plan.

Dundee Partnership Physical Activity Strategy [DED095](#)

4.83 The Dundee Physical Activity Strategy, rooted in the national Active Scotland Framework and Local Community Plans, sets the city's priorities for promoting physical activity. After reviewing the previous strategy and engaging with stakeholders, four key frameworks were developed: Active Living, Dance, Play, and Sport & Recreation. Each framework addresses specific issues and is overseen by governance groups reporting to the Physical Activity Leadership Group. The strategy aims to make Dundee "An Active City with Active People" through coordinated efforts, investment, and unity.

Sports Facilities, Sport Scotland [DED288](#)

4.84 This dataset contains multiple themed layers of different types of sporting facilities across Scotland. The facilities are represented as point locations, which have been captured against Google Maps (along with attributes and details about them). This will form part of the evidence used to consider where there are existing sites that can be identified in the Spatial Strategy as well as to help inform the assessment of community need and demand in relation to existing assets and opportunities for new/upgraded facilities.

4.85 Below is the number of each type of facility identified within the Dundee City Council boundary:

- Athletics Tracks (incl velodromes, training areas, indoor and outdoor) - 4
- Bowling Greens (incl croquet, étanque and cricket squares) - 17
- Fitness Suites - 14
- Golf Courses - 4
- Ice Rinks (incl curling rinks) - 1
- Pitches (incl size, sport and type) - 156
- Sports Halls (incl gyms and other types) - 84
- Squash Court - 4
- Swimming Pools (incl diving and other types) - 12
- Indoor Tennis Courts - 0
- Outdoor Tennis Courts - 5

Skateparks

4.86 According to internal Grounds Maintenance data, Dundee is home to four skateparks- South Road, Finlathen Park, Whitfield and Dudhope which are open to skateboarders, BMX bikers and inline skaters. There is also an indoor skatepark at Gellatly Street.

Community Sports Hubs [DED037](#)

4.87 Leisure and Culture Dundee work in partnership with Sportscotland to develop Community Sports Hubs. The following Community Sports Hubs are located in Dundee:

- Caird Park Community Sports Hub
- Craigie Community Sports Hub
- Dundee North West Community Sports Hub
- Fairfield Community Sports Hub
- Forthill Community Sports Hub
- Tay Estuary Water Sports Hub
- West End Community Sports Hub

Policy 22: Flood Risk and Water Management

NPF4 Policy 22 Flood risk and Water Management [DED201](#)

- 4.88 The intent of this policy is “to strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding.” LDPs should strengthen community resilience to the current and future impacts of climate change, by avoiding development in areas at flood risk as a first principle. Resilience should also be supported by managing the need to bring previously used sites in built up areas into positive use; planning for adaptation measures; and identifying opportunities to implement improvements to the water environment through natural flood risk management and blue green infrastructure. Plans should take into account the probability of flooding from all sources and make use of relevant flood risk and river basin management plans for the area.
- 4.89 The policy’s implications for development management are that development in flood risk areas will only be supported if it involves essential infrastructure, water-compatible uses, redevelopment for less vulnerable uses, or redevelopment of previously used sites where the LDP has identified a need to bring into positive use.

Draft Flood Resilience Strategy [DED122](#)

- 4.90 In May 2024, the Scottish Government published a consultation paper for its first Flood Resilience Strategy, aiming to enhance long-term flood resilience across the country. This strategy marks a shift from the traditional approach of “fixing flooding problems” to a more integrated, multi-sectoral effort to create flood-resilient communities. The strategy focuses on reducing exposure to flooding and mitigating its impacts through proactive measures.

Dundee Local Development Plan 2019 Policy 36: Flood Risk Management [DED088](#)

- 4.91 The current LDP aims to ensure development proposals do not directly or indirectly impact on areas at risk of flooding. All sources of flooding (fluvial, coastal, pluvial, drainage, infrastructure failure e.g. reservoirs, and groundwater) including the impacts of climate change should be considered.
- 4.92 There is a general presumption against development on previously undeveloped land and development of essential civil infrastructure where flooding is predicted up to and including the critical 1:200 year storm event plus an additional allowance of 600mm. Areas with a 1 in 1000 annual probability of flooding will generally be suitable for most development. Like NPF4, this policy highlights the need for developments to incorporate flood resilient materials and construction methods and considers existing or under-construction flood protection schemes as a factor in determining the viability of new developments in flood risk areas. Flood risk assessments are required for any development within medium to high-risk categories and potentially in low to medium risk areas based on local circumstances.

Dundee Local Development Plan 2019 Policy 37: Sustainable Drainage Systems [DED088](#)

- 4.93 SuDS are environmentally friendly and cost-effective for managing surface water by slowing runoff and treating it naturally. They integrate with the Green Network, enhancing habitats. Policy 37 mandates SuDS for new developments, excluding single houses and coastal discharges. Designs must manage water from 1:200 year storms plus climate change allowances, keeping levels 600mm below floor levels. SuDS should support ecological approaches, treatment quality, and habitat creation, avoiding negative impacts on water ecology.

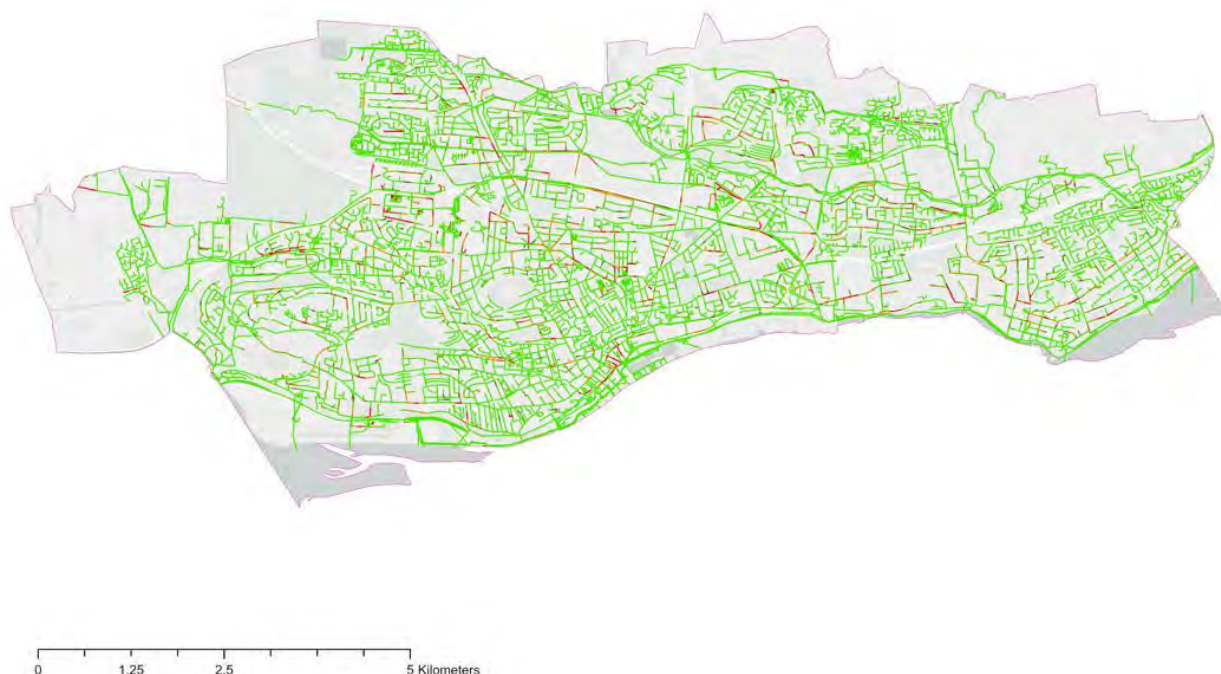
Dundee Strategic Flood Risk Assessment 2025 [DED271](#)

- 4.94 An updated SFRA is being prepared for the Dundee City Council area to replace the 2017 assessment, following SEPA’s “SFRA Guidance for Planning Authorities”. A phased approach has been adopted with Stage 1 forming part of the Evidence Report and Stage 2 covering site screening during the preparation of the Proposed Plan. Stage 1 sets out the available information relating to all aspects of flood risk and a gap analysis. A map-based assessment will also be carried out before Proposed Plan stage. Stage 2 will identify areas where climate change is resulting in unmanageable flood exposure. It will

identify where and how actions contained in the local flood risk management plan affect the location of new development. It will inform the Open Space Strategy and Strategic Environmental Assessment (SEA) of the LDP. Stage 1 has been prepared in close collaboration with SEPA and Stage 2 will be informed by a similar level of consultation with them.

Dundee Pipe Capacity Flooding- Scottish Water

4.95 The Tay PFI – Hatton Waste Water Treatment Works which serves Dundee has a design capacity of 250,000 Population Equivalent (PE) and a current load of 237,472 PE, therefore the available asset capacity is 12,528 PE which is approximately 5 % of the design capacity. The Dundee sewer network consists of a combination of historic combined systems and modern separate drainage infrastructure. Many older assets show signs of hydraulic limitations and are vulnerable to infiltration. Capacity constraints are severe in low-lying and steep catchments, where heavy rainfall can lead to surface flooding. Climate change has intensified these challenges. While the network is structurally resilient in many areas, it requires ongoing investment to meet current and future demands. Figure 4.7 below shows pipes with adequate capacity as green, pipes with limited capacity as amber, and pipes with very limited or no capacity as red. Note that Figure 4.7 was prepared from a strategic high-level assessment based on return periods up to a 1:50 year event using FEH13 rainfall data.



Esri UK, Esri, TomTom, Garmin, GeoTechnologies, Inc, METI/NASA, USGS

Figure 4.7 Dundee Pipe Capacity

Surface Water and Drainage Planning Guidance 2020 [DED341](#)

4.96 The purpose of this guidance is to help applicants understand Dundee City Council's expectations and requirements in respect of the surface water and drainage information required to support planning applications for development in Dundee. The guidance should facilitate the efficient validation and processing of planning applications.

4.97 Developers should consider the potential to create new green or blue infrastructure to form part of the Green Network when designing sustainable drainage systems. SuDS systems and the associated infrastructure should be located within public areas and be maintained by a publicly accountable organisation/body. Privately maintained drainage systems serving more than two properties will generally not be acceptable.

Surface Water Drainage Design and Flood Risk Assessment Requirements- Technical Guidance 2020 [DED342](#)

4.98 This document is used to inform the design of surface water drainage/SuDS and the preparation of Flood Risk Assessments associated with new development sites within the Dundee City Council boundary.

River Basin Management Plan for Scotland 2021-2027 [DED249](#)

4.99 River basin management planning (RBMP) protects and improves Scotland's water environment for the benefit of people, wildlife and the economy.

4.100 Much of the water environment in Scotland is in good condition. However, there are still significant problems affecting water quality, physical condition, water resources, and the migration of wild fish.

4.101 The River Basin Management Plans for Scotland set out a range of actions to address these impacts. They are produced by SEPA on behalf of Scottish Government. They cover actions for public bodies, industry and land managers in Scotland. They summarise:

- the state of the water environment;
- pressures affecting the quality of the water environment where it is in less than good condition;
- actions to protect and improve the water environment;
- a summary of outcomes following implementation.

4.102 In the third RBMP cycle, 51 new restoration projects that have the potential to improve the ecological condition of rivers in Scotland's towns and cities have been identified for delivery. Within Dundee, the restoration of the Dighty Burn is a key potential project.

4.103 This publication is a material planning consideration with the potential to significantly influence future land use strategies, their implementation and future development proposals within Dundee.

Dighty Restoration Feasibility Study (Tender Report) [DED056](#)

4.104 The Scottish Environmental Protection Agency (SEPA) have identified three lengths of the Dighty as having potential for restoration that would enhance biodiversity, expand the natural habitat and create better community access. It covers areas:

- north of Harestane Road from Harestane House, 88 Harestane Road to Emmock Road;
- east of Millburn Gardens and upstream of the Trottick Ponds; and
- between Fintry Road and Baldovie Road.

4.105 The project is subject to SEPA's internal funding approval via the Water Environment Fund. Dundee City Council will lead implementation with SEPA support. Initial development costs will come from the City Engineer's existing Flood Risk Management budget. Construction is expected to start in 2028 and will be delivered over several years. The proposal was backed by the Fair Work, Economic Growth and Infrastructure Committee in August 2024.

Tay Estuary and Montrose Basin Flood Risk Management Plan 2022-2028 [DED285](#)

4.106 The Tay Estuary and Montrose Basin Local Plan District covers around 2700km² and includes the urban areas of Arbroath, Brechin, Dundee, Montrose and Angus. Dundee is designated as a potentially vulnerable area due to flood risk from all sources including coastal from the Firth of Tay, surface water and small watercourses. The main source of flooding in Dundee is surface water, however there is also a risk of river and coastal flooding. Prior to the construction of the coastal flood protection scheme from City Quay to Dundee Airport, there were approximately 6,100 people and 4,400 homes and businesses at risk from flooding. The recent construction of the coastal flood protection schemes at Dundee and Broughty Ferry are likely to result in a revision of flood risk estimates.

4.107 This publication is a material planning consideration with the potential to significantly influence future land use strategies, their implementation and future development proposals within Dundee.

Position Statement: Elevated buildings in areas of flood risk [DED234](#)

4.108 This position statement constitutes part of 'relevant SEPA advice' as referred to in criterion a) iv of the National Planning Framework 4 (under Policy 22: Flood Risk and water management). It applies only where such structures are used to enable development that would not otherwise be acceptable according to Policy 22.

4.109 In accordance with Policy 22, sites suitable for the development of elevated buildings must be identified through the development planning process, where the need to manage flood risk rather than avoid it can be considered alongside and balanced with other policy and placemaking considerations. Avoiding development in a flood risk area is still the best approach to managing flood risk, both now and in the future – in most cases this means avoiding development completely. However, in managing climate change there may be a need to bring previously used urban land near our rivers and coasts back into positive use and to enable existing built-up areas to adapt to increasing flood risk. This must happen in a way that ensures there is no unacceptable risk from flooding to people and places, and that those places are safe and resilient in the long term.

4.110 Also, in accordance with Policy 22, sites must be previously used, and in a built-up area.

Climate Change Allowances for Flood Risk Assessment in Land Use Planning [DED029](#)

4.111 This guidance sets out required allowances for climate change that must be used for flood risk assessment following the adoption of National Planning Framework 4. A climate change allowance is a prediction of anticipated change in peak river flow, peak rainfall intensity or sea level rise caused by future climate change. The type of allowance used will depend upon the type of flooding being considered and, for river (fluvial) flooding, the size of catchment or location. This guidance will assist in the preparation of the Council's SFRA and informing site specific assessments.

Flood Risk Standing Advice for Planning Authorities [DED123](#)

4.112 Planning authorities should determine whether development is covered by this standing advice in the first instance and should only consult SEPA for flood risk advice for developments not covered by this standing advice. Consultation requests to SEPA for development covered by standing advice will be directed to this document. The advice addresses various sources of flooding, including river (fluvial) flooding, coastal flooding and surface water (pluvial) flooding.

Water Scarcity [DED306](#)

4.113 The overall risk of water scarcity takes account of the individual water scarcity indices, relevant water use, sectors in each region and forecast weather conditions. NPF4 presumes against private water supplies, unless they will be sourced from a sustainable water source that is resilient to periods of water scarcity. The Drought Risk Assessment tool helps to identify water scarcity levels and areas at risk.

Scottish Water Surface Water Policy [DED274](#)

4.114 Scottish Water's starting position on the management of surface water through infrastructure assets is that they will not accept any new surface water connections to the combined sewers network. Surface water can be more sustainably treated above ground, often in conjunction with other existing surface waters, in a way that contributes to flood risk management, place making and biodiversity.

Dundee Climate Change Risk and Vulnerability Assessment (2024) [DED074](#)

4.115 This assessment identified actions for mitigating climate risks through land use planning including retrofitting SuDS, considering air quality at early stages of the development process, and increasing well designed blue and green infrastructure.

4.116 Drought and water scarcity are both projected to increase in the region however, on the assumption that industry planning and adaptation will take place and prevent severe shortages to public water supplies, the level of risks is scored medium for both 2°C and 4°C scenarios.

CivTech 8.3 Challenge- Nature Networks Corridors [DED027](#)

The below map shows initial mapping of strategic corridors for nature within Dundee. This will be refined using a Natural Capital Tool provided by NatureScot and will then be open for public consultation in early 2026.



4.117 Dundee City Council and Scottish Water recognise the need to develop new ways to manage intense rainfall and storm water flooding to create future-proofed, flood-resilient communities. The Water Resilient Dundee partnership aims to jointly plan and sustainably manage rainwater in the City of Dundee to help the city respond to climate change now and for future generations. It is important to note that there are many existing green spaces, particularly park areas, in Dundee which are designed or configured in such a way that rainwater and surface water from these areas flows directly into the city's combined sewer system. This can be problematic because during heavy rainfall, combined sewers can become overwhelmed, leading to flooding or the discharge of untreated sewage into rivers or other bodies of water.

4.118 The Partnership is developing an overall drainage strategy for the City, as well as detailed District strategies and projects. The City Districts, sixty in total, each have a preferred conveyance route to manage flows towards or directly to the water environment. The watercourses across the City are critical to managing rainwater sustainably. Many of the urban watercourses have been culverted or piped below ground level at some time in the past. Industrial use and development in the main urban area of Dundee has led to diversions and, in some cases, the connection of the watercourses into the combined sewers. The Partnership recognises the need to collaborate with others to ensure that drainage work in the urban catchment enhances, rather than impacts, the natural environment. To date, the Partnership has influenced the successful delivery of the Douglas Community Park (National Lottery) and Albert Street

Works (Sustrans) projects, ensuring that sustainable drainage was a feature of these multiple-benefit projects.

4.119 Dundee sits within the Tay Hatton Drainage Operational Area. Combined flows are conveyed from Dundee to the Treatment Works at Hatton, close to Arbroath. 88.5% (81,252) of properties in Dundee drain through a combined system. 9% (6,397) of these properties start in a separate system which connects to combined sewers. Only 11.5% (9,306) of properties across Dundee drain to a separate system which discharges directly to the water environment. The City's surface water networks are evident around the edges of the City, along the Dighty Corridor to the North, Tay to the south and Invergowrie Burn to the West as see in Figure 4.9. Within the City, there are 22km of known culverted water courses. The Scouring, Dens, Back, Mause and Claypots Burns are all known to connect to the combined sewers, accounting for 5.2 km of culverted water course.

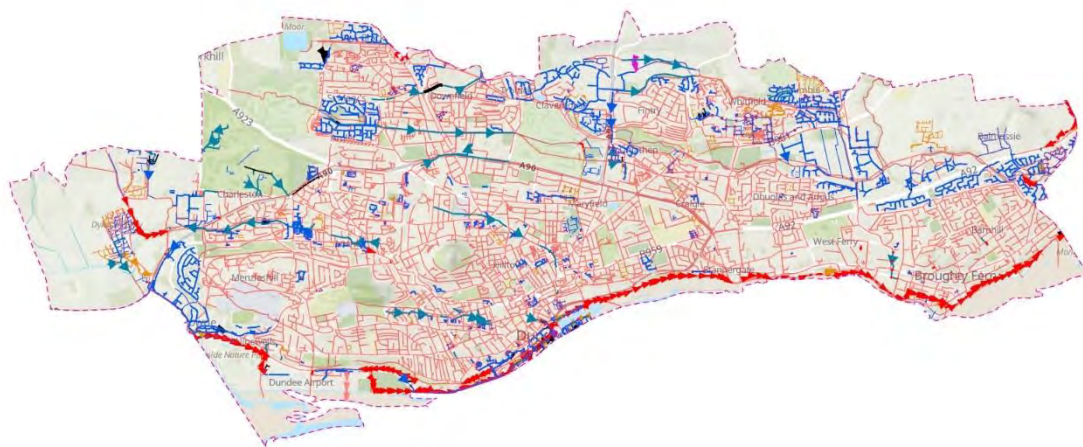


Figure 4.9 : City of Dundee Area Drainage Network (Red - Combined, Blue - Surface Water) (DED307)

Data sets / spatial data resources

SEPA Flood Maps Overview [DED279](#)

- 4.120 SEPA's Flood Maps consist of two key series of flood hazard maps for both river and coastal flooding: 'Present Day' and 'Future' Flood Hazard Maps. These maps are accessible on SEPA's website.
- 4.121 Present Day Flood Maps: These maps are generated using current meteorological, river flow, and sea level data, reflecting the climate conditions of today. They do not account for future changes due to climate change.
- 4.122 Future Flood Maps: These maps incorporate the predicted effects of climate change, based on forecasts of river flows and sea levels for the 2080s. This scenario helps identify potential future flood risks.
- 4.123 The latest data highlights areas at risk of flooding (river, surface water, and coastal), the likelihood of such events, existing flood defence schemes, opportunities for natural flood management, and economic and community activities that may be at risk. Specific opportunities for natural flood management include runoff reduction in Camperdown Park, floodplain storage and sediment management around the Dighty Burn, and high potential for estuarine surge attenuation along the Waterfront.

4.124 For planning purposes, land or structures are considered at risk of flooding if they have an annual flood probability greater than 0.5%, which includes an allowance for future climate change. This risk is indicated on SEPA's future flood maps and may require further evaluation through a flood risk assessment.

Recommended Riparian Corridor Layer [DED242](#)

4.125 Healthy riparian corridors offer numerous benefits, including climate adaptation, improved water quality, enhanced habitats and wildlife, flood mitigation, and increased community amenities. Ensuring riparian corridors remain undeveloped helps protect buildings and infrastructure by keeping them set back from rivers, thereby reducing flood risks. These corridors promote flood reduction through increased infiltration, altered surface roughness, and expanded water storage capacity. The recommended riparian corridor width is scaled to the river's width, allowing rivers the space to adapt to changing flood conditions and offering a range of environmental and community benefits. Riparian areas are a crucial component of the natural environment within nature network mapping.

Riparian Vegetation Planting Opportunities Layer [DED242](#)

4.126 This layer identifies at a catchment scale, areas where riverbanks could be protected from erosion by improved riparian vegetation ideally including riparian woodland. Thus, the layer identifies areas where tree planting will benefit geomorphology through river restoration when morphological pressures were present in a particular section. This layer could be used as a source of evidence at a strategic scale to identify where riparian vegetation, and particularly woodland could be beneficial to the water environment within a catchment.

Water Classification Hub [DED304](#)

4.127 The most recent water environment classification data, from 2022, includes details on both bathing waters and surface waters relevant to the Dundee City Council area. The latest overall condition of the Lower Tay Estuary and Upper Tay Estuary water bodies has been classified as **Good**. The condition of bathing waters at Broughty Ferry has been most recently classified as Excellent.

RBMP3 Water Environment Hub [DED241](#)

4.128 Several pressures on water bodies in the Dundee City Council area are evident from this spatial dataset. For example, the Dighty Water river is facing pressures from invasive species (namely the North American signal crayfish), its physical condition has been weakened by modifications to its bed, banks and shores and it is a source of diffuse pollution. The Local Development Plan could help address pressures through identification of opportunities to improve the water environment in nature network/ blue green infrastructure mapping or in proposed development.

Geomorphic Risk Layer [DED131](#)

4.129 To accommodate more frequent floods, rivers will erode their banks to increase their channel size, thereby increase their capacity so they can convey larger volumes of water. The geomorphic risk layer identifies sections along the river network where channel adjustment (erosion) is likely to be significant. Sections of the Dighty Water are described as High geomorphic risk.

Scottish Water data

4.130 There are a number of relevant datasets shared with Dundee City Council as part of an agreement with Scottish Water:

- Dundee Projects (Scottish Water Projects within Dundee City boundary)
- Hatton PFI Combined Sewers
- Hatton PFI Foul Sewers
- Hatton PFI Storm Sewers
- Dundee Gullies within Depression Watersheds
- Hatton Opportunity Mapping
- Storm Water Management Opportunities
- Flooding Media Map
- Dundee Strategic Flow Paths, Green and Grey Space, and Large Roofs

4.131 Unfortunately, we cannot publish this mapped information due to licensing restrictions. However, these datasets highlight strategic capacity asset data for water and wastewater, as well as opportunities for projects to enhance blue and green infrastructure whilst managing flood risk.

Dynamic Coast [DED108](#)

4.132 Dynamic Coast provides detailed reports on erosion and coastal change, highlighting places where erosion alone will be a significant future challenge, and where it may increase the risk of flooding. Please refer to the Climate Change, Mitigation and Adaptation, Environmental Responsibility Topic Paper for more in-depth analysis of this data in a local context.

Summary of Stakeholder Engagement

Stakeholder Working Group

4.133 The below initial stakeholder working group was developed through internal and external individuals with specific interest in the thematic area of Water Environment, Open Space, Play, Recreation and Sport. The initial stakeholder working group was restricted to internal Dundee City Council representatives and external topic experts. These topic experts have assisted in developing a robust evidence base for the topic paper grouping.

Internal

- DCC Environment (Greenspace)
- DCC Drainage Engineers

External

- NatureScot
- Scottish Environment Protection Agency (SEPA)
- Scottish Water
- Sport Scotland

Stakeholder Engagement

4.134 The Water Environment, Open Space, Play and Sport Topic Paper (DER004) was published for consultation between 21 August 2024 and 2 October 2024 and has formed the basis for the 'Summary of Evidence'. The following table summarises the comments received along with the Dundee City Council (DCC) response.

Respondent	Summary of Comments and DCC Response
Private Individual – (STA036)	In agreement with the Topic Paper. DCC Response: Comments noted, no further contact required.

Private Individual – (STA006)	In agreement with the Topic Paper. DCC Response: Comments noted, no further contact required.
Homes for Scotland – (STA047)	Raised issues regarding: - Robust Site Assessment Methodology (SAM): Essential for considering flooding and ensuring allocated sites are delivered within the plan period. - Public Open Space Audit and Strategy (2024): Should be reviewed before submitting the Evidence Report to the Gate Check. - Compensatory Flood Storage: SEPA and local planning authorities are exploring this to facilitate development. Dundee City Council should identify opportunities for such storage. - Overlaying Housing Proposals with Flood Extents: This could help homebuilders contribute to flood mitigation solutions, especially for 20-minute neighbourhoods and brownfield sites. - Maintenance of Flood Storage: To be managed by a factor and agreed through planning conditions. DCC Response: Homes for Scotland comments on this Topic Paper have been read in conjunction with the draft Site Assessment Methodology. This has been circulated to you separately for comment. A Strategic Flood Risk Assessment (SFRA) is in development which will identify where flood risk exists in the plan area, and therefore areas where new development should be located or avoided at the Proposed Plan stage. Dundee City Council acknowledges the importance of compensatory flood storage in mitigating flood risks associated with new developments. This approach aligns with the Scottish Environment Protection Agency's (SEPA) guidance, which emphasises the necessity of providing compensatory storage on a "like-for-like" basis to offset any loss of floodplain capacity due to land-raising or construction activities. The Planning Authority's position on opportunities for compensatory flood storage will be clarified in the forthcoming Strategic Flood Risk Assessment. The updated Open Space Strategy is still in development and is not a statutory requirement of the Evidence Report stage of LDP but it will be prepared in order to inform the Proposed Plan. With regards to the comments received that are out with the scope of the evidence report stage, as the review of the LDP progresses the Council will have a Call for Ideas stage as well as consultation on Proposed Plan which will provide further opportunity for comment.
NatureScot – (STA032)	Made some general points around the inclusion of the AECOM nature network outputs and NWCN and designated sites and flood management. DCC Response: Comments incorporated into Schedule 3, verbal confirmation of this at NatureScot/DCC information sharing meeting on 22/10/24.
Historic Environment Scotland – (STA004)	In agreement with the Topic Paper. DCC Response: Comments noted, no further contact required.
SEPA – (STA002)	SEPA were in general agreement with the Topic Paper, noting the following points:

	- Mapping and Enhancing Blue and Green Infrastructure (BGI): Ensure relevant water environment evidence is used to map existing BGI and identify enhancement opportunities to inform the spatial strategy. - Policy 20 Evidence: Current evidence focuses on 'green' aspects. Important 'blue' infrastructure evidence sources should also be included. - Strategic Flood Risk Assessment (SFRA): Updated SFRA outputs can help identify areas for enhanced BGI to increase flood resilience and flood risk evidence. DCC Response: The datasets requested to be added to the Schedule evidence list for Policy 20 have been added, except for the Scottish Wetland Inventory layer which does not include any records for the Dundee City Council area. However, a recently produced Dundee City Council Storymap- “Dundee’s Biodiversity” includes key information about Dundee’s ponds and wetland and has been added. We have been unable to locate the “Water Environment Fund Projects current, completed and future opportunities layer” mentioned. The PDF map identified here is not of sufficient quality to view Dundee-specific projects : Ten years restoring rivers Beta SEPA Scottish Environment Protection Agency. The updated SFRA is being prepared in collaboration with the Council’s drainage engineers and we will be in touch with SEPA when a draft is ready for consultation. The SFRA will include GIS maps showing flood extents for different scenarios plus wording around historical events, areas at greatest risk, potentially vulnerable areas, existing defences, topography and hydrology. SEPA were consulted on multiple drafts of the Stage 1 SFRA from July to October 2025 and provided a statement of agreement with the Council’s approach and the content of the assessment. An issue was initially raised about the inclusion/publication of a Flood Protection study which has since been resolved. The methodology was modified at SEPA’s request to ensure that all sites will be screened against all evidence sources listed in Stage 1. SEPA will also be consulted during Stage 2 of the process.	
Sport Scotland – (STA021)	In agreement with the Topic Paper. DCC Response: Comments noted	

Summary of Implications for the Proposed Plan

Policy 20 – Blue and Green Infrastructure

4.135 Blue and green infrastructure refers to a wide range of natural assets, such as, trees, rivers and allotments. These assets have the potential to improve living standards and offer nature-based alternatives to issues relating to climate change when they are comprehensively considered within the planning or development process.

4.136 Dundee has a high supply of green open space, whilst having a broad range of natural ecosystems across both blue and green systems. This statement is evidenced by Dundee Biodiversity Duty Report 2021-2023 and the State of Scotland’s Greenspace Report. The upcoming Open Space Audit and Strategy is expected to echo this, whilst also demonstrating the quality of connectivity and accessibility of

these systems. This information will be valuable during the proposed plan process to further inform decision making with systemic regard to improving the cities blue and green infrastructure.

4.137 The Proposed Plan will take an active role in promoting, protecting and developing blue and green infrastructure. The spatial strategy should identify and protect blue and green infrastructure assets and networks; enhance and expand existing provision including new blue and/or green infrastructure.

4.138 Future developments should consider impacts on biodiversity from the start, taking an infrastructure first approach. Dundee is a small dense urban area with almost a hundred and fifty thousand people co-existing with nature. It is important as we develop and increase density within the city, that we prioritise and utilise blue and green assets sympathetically, to create a more environmentally and socially resilient city.

4.139 The proposed Local Development Plan will support development that,

- protect, enhance and create green infrastructure that facilitates nature to recover and thrive where feasible.
- incorporate green infrastructure and active travel routes that encourage active lifestyles.
- strengthen climate resilience by protecting, enhancing, and creating green infrastructure that supports adaptation to climate change.
- promote connectivity across green infrastructure to create a cohesive, natural network for people and wildlife.
- delivers access to high-quality green and blue spaces, routes, and features.

4.140 Dundee's current 2019 Local Development Plan seeks Green Infrastructure. The contribution items for which Green Infrastructure developer contributions may be sought include:

- Improvements to core paths serving the development
- New and/or improved on or off road cycle/walking routes to connect with existing core paths
- Cycle parking facilities.
- Provision of open space or equivalent contributions to upgrading existing open space such as nearby community woodlands that serve the development area.
- Route or interpretative signage.
- Off-site sustainable urban drainage schemes (all Greenfield sites are expected to include sufficient sustainable drainage facilities within the site, however it is acknowledged that this may not be practical on all brownfield sites)

4.141 The current development contributions for Green Infrastructure will be reviewed and considered for potential inclusion for the upcoming local development plan.

Policy 21 – Play, Recreation and Sport

4.142 The evidence summarised above highlights several key implications for the Dundee Local Development Plan (LDP), emphasizing the interconnectedness of play, recreation, sport, and the broader goals of 20-minute neighbourhoods and blue-green infrastructure.

4.143 The LDP should ensure that parks, playgrounds, sports facilities, and open spaces are evenly distributed across Dundee and accessible within a 10-minute walk or cycle for all residents. Utilising data from the Open Space Strategy, Play Sufficiency Assessment, Forestry and Woodland Strategy, and community feedback from the Dundee Place Standard Survey ([DED229](#)) will be crucial to understanding the needs and demands of communities. Mapping existing facilities will help identify gaps in provision, ensuring that new developments address areas of need. This evidence-based approach will guide the allocation of land for new open spaces and play infrastructure while protecting existing assets.

4.144 The LDP should prioritise the development of safe, well-lit, and connected walking and cycling routes. These routes should link residential areas to recreational facilities, schools, and community sports hubs, facilitating active travel and ensuring that recreational spaces are easily accessible.

4.145 Streetscapes and public spaces should be designed to naturally encourage play and physical activity. The LDP should promote the inclusion of multi-functional spaces, interactive public art, playful street furniture, and safe pedestrian zones, making physical activity an integral part of daily life.

- 4.146 The development of recreational facilities should be closely aligned with broader health initiatives, such as those aimed at reducing obesity, increasing physical activity, and improving mental health. By doing so, the LDP can contribute to addressing the health inequalities identified in areas like Dundee's East End, Lochee, and Coldside wards, where residents face significant health challenges.
- 4.147 The LDP will seek to support high quality development in the right places and this can include the provision of open spaces and play areas as part of development proposals. In some circumstances it may be appropriate to use planning obligations, such as Section 75 agreements, to secure the creation or improvement of open spaces and play infrastructure, ensuring that new developments enhance the local environment and meet community needs.

Policy 22- Flood Risk and Water Management

- 4.148 Dundee is currently facing significant pressures and future threats related to sea level rise and flood risk. To address these challenges in the proposed Local Development Plan (LDP), a comprehensive approach that integrates flood risk management with land use planning is essential.
- 4.149 An updated Strategic Flood Risk Assessment (SFRA) will inform choices about appropriate locations for development and avoid increasing overall flood risk. It is important to ensure that new development does not contribute to flood risk, as well as avoiding being located in a flood risk area itself. The SFRA, alongside the Strategic Environmental Assessment (SEA) site assessment and Water Environment Hub, will be utilised to assess flood risks for all proposals considered for potential LDP allocation. Data on sewer and surface water network capacity will guide decisions on land allocation, with robust infrastructure areas potentially earmarked for higher-density development.
- 4.150 The LDP will need to consider climate change allowances and ensure that all developments, especially in areas identified as at risk, adhere to guidelines set forth in SEPA's Climate Change Allowances for Flood Risk Assessment. The LDP will aim to balance urban growth with sustainable water management practices. This includes protecting areas that contribute to flood resilience by designating zones for green spaces and riparian corridors.
- 4.151 The Open Space Strategy and SFRA will inform the identification and analysis of natural flood risk management opportunities within Dundee. Green infrastructure solutions, such as green roofs, permeable surfaces, and rain gardens, will be integrated to manage surface water runoff, reducing the risk of surface water flooding by allowing natural infiltration. SuDS will be encouraged to mimic natural water management processes, with features like swales, retention ponds, and wetlands helping to manage urban water flow, filter pollutants, and reduce flood risks.
- 4.152 Given Dundee's proximity to the North Sea, coastal flooding poses a significant threat. Natural Flood Management (NFM) approaches, such as restoring saltmarshes and dunes, could be considered to act as natural buffers. Managed realignment, allowing certain low-lying coastal areas to flood naturally, may also be explored as a strategy to reduce pressure on hard coastal defences and create new habitats. It is important to note that improving the condition of designated sites, as set out in the Biodiversity, Natural Places, Trees and Soils topic paper, may give wider benefits such as flood management, particularly as the designated sites in Dundee are mostly restricted to the coast.
- 4.153 Environmental Impact Assessments (EIAs) for proposed developments will be informed by the data and strategies outlined above, ensuring that potential impacts on water management systems are thoroughly assessed and mitigated.
- 4.154 Finally, the Plan will also consider renewable opportunities from local water bodies as identified in Local Area Energy Planning, contributing to Dundee's broader sustainability goals.

Statements of Agreement / Dispute

Statements of Agreement

4.155 As outlined within the Summary of Stakeholder Engagement, a significant level of engagement was carried out with multiple stakeholders during pre-consultation, consultation, and post-consultation of the topic paper. The following organisations agree with the evidence base presented:

- NatureScot
- Historic Environment Scotland
- Homes for Scotland
- Scottish Environment Protection Agency (SEPA)
- Sport Scotland

Statements of Dispute

4.156 There were no areas of dispute for the Water Environment, Open Space and Sport Topic Paper.

Health and Safety (005)

Issue: Topic / Place	Health and Safety (DER005)
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended, Section 15(5) • the size, composition, health and distribution of the population of the district; • the health needs of the population of the district; • the infrastructure of the district (including health care facilities); and • how that infrastructure is used.
Links to Evidence	• National Planning Framework 4 (DED201) • Dundee Local Development Plan (LDP) 2019 (DED088) • Place and wellbeing: integrating land use planning and public health in Scotland (DED225) • National Records of Scotland - Mid-2024 population estimates (DED386) • National Records of Scotland - Population estimates time series data (DED387) estimate • NHS Tayside: Director of Public Health Annual Report 2023 (DED215) • DHSCP: Strategic Commissioning Framework 2023-2033 (DED270) • DHSCP: Strategic Needs Assessment September 2021 (DED340) • Protecting People Annual Report Summary 2022-2023 (DED237) • A Connected Scotland (DED003) • Recovering our Connections 2023-2026 (DED243) • National Guidance on Action to Address Suicides at Locations of Concern (DED200) • DHSCP: Property Strategy 2022-2025 (DED236) • DHSCP: Property Strategy 2022-2025_April 2023 Update (DED361) • DHSCP: Property Strategy 2022-2025_February 2025 Update (DED362) • DHSCP: General Practice Premises Strategy 2022 (DED129) • DHSCP: General Practice Strategy 2024 to 2029 (DED130) • NHS Scotland Letter to NHS Boards: Whole System Infrastructure Planning (DED214) • Dundee Community Food Network (DED388) • Dundee Cycling Strategy 2019 (DED078) • Community Empowerment (Scotland) Act 2015 - Part 9 Allotments (DED389) • Review of Retailing in Dundee 2023 (DED247) • Fast Food Booming – A Cause for Concern? (DED120) • Local Food Growing Strategy Dundee 2020 (DED182) • Dundee Community Gardens Map 2024 (DED393) • Air Quality Action Plan (DED014) • LDP2019 Supplementary Guidance - Air Quality and Land Use Planning (DED015) • Cleaner Air for Scotland 2 - Towards a Better Place for Everyone (DED028) • Air Quality Annual Progress Report (DED016) • Scottish Government: Dundee Agglomeration - Noise Action Plan (DED323)

- EU Environmental Noise Directive - Action Planning Update (Report 166-2015) ([DED116](#))
- LDP2019 Supplementary Guidance Developer Contributions ([DED053](#))

Summary of Evidence

Policy Context

National Planning Framework 4 ([DED201](#))

5.1 Improving health and wellbeing for the people and communities of Scotland is a fundamental outcome of the National Planning Framework 4 (NPF4) national spatial strategy. The spatial strategy recognises that there are significant health and wellbeing inequalities in Scotland and that future development can help to address this through the delivery of sustainable, liveable and productive places. Accordingly, health and wellbeing is a cross-cutting outcome with multiple policy links, as listed below. Page 19 of NPF4 provides further detail and context surrounding the policy links.

- Policy 1 Tackling the climate and nature crises
- Policy 2 Climate mitigation and adaptation
- Policy 3 Biodiversity
- Policy 4 Natural places
- Policy 5 Soils
- Policy 6 Forestry, woodland and trees
- Policy 9 Brownfield, vacant and derelict land and empty buildings
- Policy 10 Coastal development
- Policy 11 Energy
- Policy 12 Zero waste
- Policy 13 Sustainable Transport
- Policy 14 Design, quality and place
- Policy 15 Local Living and 20 minute neighbourhoods
- Policy 16 Quality homes
- Policy 18 Infrastructure first
- Policy 19 Heat and cooling
- Policy 20 Blue and green infrastructure
- Policy 21 Play, recreation and sport
- Policy 22 Flood risk and water management
- Policy 23 Health and Safety

NPF4 Policy 23 Health and Safety

5.2 Policy 23 has a particular focus on health and wellbeing. It intends to protect people and places from environmental harm, to mitigate risks arising from safety hazards, and to encourage, promote and facilitate development that improves health and wellbeing.

5.3 Successful outcomes through policy delivery would result in people's health being improved and health inequalities being reduced; human health and the environment being protected through safe places; and the delivery of health infrastructure through a planned approach.

5.4 The policy sets out the following specific requirements of Local Development Plans:

- LDP spatial strategies should seek to tackle health inequalities particularly in places which are experiencing the most disadvantage. They should identify the health and social care services and infrastructure needed in the area, including potential for co-location of complementary services, in partnership with Health Boards and Health and Social Care Partnerships.

- LDPs should create healthier places for example through opportunities for exercise, healthier lifestyles, land for community food growing and allotments, and awareness of locations of concern for suicide.
- LDP spatial strategies should maintain appropriate distances between sites with hazardous substances and areas where the public are likely to be present and areas of particular natural sensitivity or interest.

5.5 Implications for planning's Development Management are that development proposals which have a positive effect on health will be supported, e.g. proposals for health and social care facilities and infrastructure, and proposals that incorporate opportunities for exercise, community food growing or allotments. Development proposals should also be designed to take into account suicide risk.

5.6 At the same time, proposed development which is likely to have a significant adverse effect on health will not be supported, including considerations surrounding air quality, noise pollution, major accident hazard sites, major accident hazard pipelines, licensed explosive sites, and applications for hazardous substances consent. The agent of change principle applies, and Health Impact Assessments, Air Quality Assessments, and Noise Impact Assessments may be required. Advice from the Health and Safety Executive, Office of Nuclear Regulation, or Scottish Environment Protection Agency must be considered carefully in the determination of planning applications.

Dundee Local Development Plan 2019 (DED088)

5.7 Dundee City Council's current Dundee Local Development Plan 2019 (LDP 2019) (DED088) contains policies which respond to various health, wellbeing and safety concerns reflected in NPF4's Policy 23 Health and Safety. The policies have been identified below, including a note on the health and safety relevance.

LDP 2019 Policy and Supplementary Guidance	Relevance to NPF4 Policy 23
Policy 1: High Quality Design and Placemaking	Appendix 1: 2. Safe and Pleasant, and 3. Easy to Move Around and Beyond
Policy 10: Design of New Housing	Appendix 4: Cycle Provision and Amenity Provision
Policy 18: Community Facilities	Proximity to walking, cycling and public transport
Policy 20: Funding of On and Off Site Infrastructure Provision	Contributions to healthcare infrastructure improvements where new need is established
Policy 28: Protecting and Enhancing the Dundee Green Network	The Green Network includes community-led green infrastructure projects such as allotments, community growing spaces and temporary greening.
Policy 29: Outdoor Access and the Dundee Green Network	Protection and expansion of access to green infrastructure
Policy 39: Environmental Protection	Protection from pollution
Policy 40: Air Quality	Protection from pollution
Policy 42: Development of or next to Major Hazard Sites	Protection from major hazard sites
Policy 43: Waste Management Installations	Protection from pollution
Policy 45: Energy Generating Facilities	Protection from pollution
Policy 54: Safe and Sustainable Transport	Promotion and provision of walking, cycling and public transport
Air Quality - Supplementary Guidance	Protection from pollution

Figure 5.1: Local Development Plan 2019 policy links to NPF4 Policy 23.

Place and Wellbeing Outcomes ([DED385](#))

5.8 Formed by the [Place and Wellbeing Collaborative](#), the [Place and Wellbeing Outcomes](#) provide a consistent and comprehensive set of outcomes that every place needs to enable those who live, work, and relax there to stay healthy and thrive. The outcomes centre around five key themes (as shown in the diagram below), which are underpinned by the principles of equality, net-zero emissions and sustainability. The outcomes help all stakeholders and sectors to focus decision making and implementation on a common set of evidenced features that make positive places. They provide a consistent foundation for measuring and a platform for learning about how we can all make changes in our systems, plans, policies, strategies and projects to support better places.



Figure 5.2: Place and Wellbeing Outcomes Diagram ([DED385](#))

Dundee's Health

Population Size, Composition, and Distribution

5.9 The summary presented throughout this section is compiled from the following evidence and data sources:

- National Records of Scotland - Mid-2024 population estimates ([DED386](#))
- National Records of Scotland - Population estimates time series data ([DED387](#))
- DHSCP: Strategic Needs Assessment September 2021 ([DED340](#))

5.10 Dundee is Scotland's fourth largest city with a 2024 mid-year estimated population of 149,880. In 2024, there were more females 76,723 (51.2%) than there were males 73,157 (48.8%). Dundee's estimated population has generally experienced marginal increases from 147,200 in 2011 to 149,880 in 2024, an overall increase of 1.82% (2,680). During this period, the last two years have seen the most significant growth in population, with a 0.95% (1,410) increase from 148,470 in 2022.

5.11 The following table in Figure 5.3 provides a broad breakdown by age of Dundee's 2024 population and the changes since the last census in 2011. The increase in the senior population (65+) is prominent and has significant implications for healthcare, particularly regarding the 75+ and 90+ age groups where there will be the largest increase in numbers that increasingly rely on unpaid family care, and health and social care services, as they become frailer. The notable difference in the increase since 2011 to 2024

of 65+ years, when compared to the Scottish average, is possibly associated with Dundee's health inequalities.

Age Range	Population 2024	Population Percentage	Percentage Change Since 2011	Scottish Average Percentage Change Since 2011
0 to 15 years	24,197	16%	2%	-2%
16 to 64 years	98,226	66%	-1%	1%
65+ years	27,457	18%	11%	27%

Figure 5.3: Dundee Population Breakdown for 2024 and Change by Age Group Since 2011

5.12 The 16-64 age group has fallen by -1% and is projected to fall during the next 10 years and beyond, which may have an impact on the size of the city's working population and the economy in the medium term. Dundee's population projections to 2043 are set out in the table below. Considering all ages combined, a general trend of population decline is projected into the future, -0.3% to 2028, and -0.6% to 2043, Dundee's continuing drop in birthrates is a contributing factor. The significant increase in the senior population and the decrease in new-born and young people is distinct. Positively for Dundee, the largest proportion of its population are younger adults (aged 20-34 years), most likely a result of the significant student population, which has the potential to support the city's economic prospects.

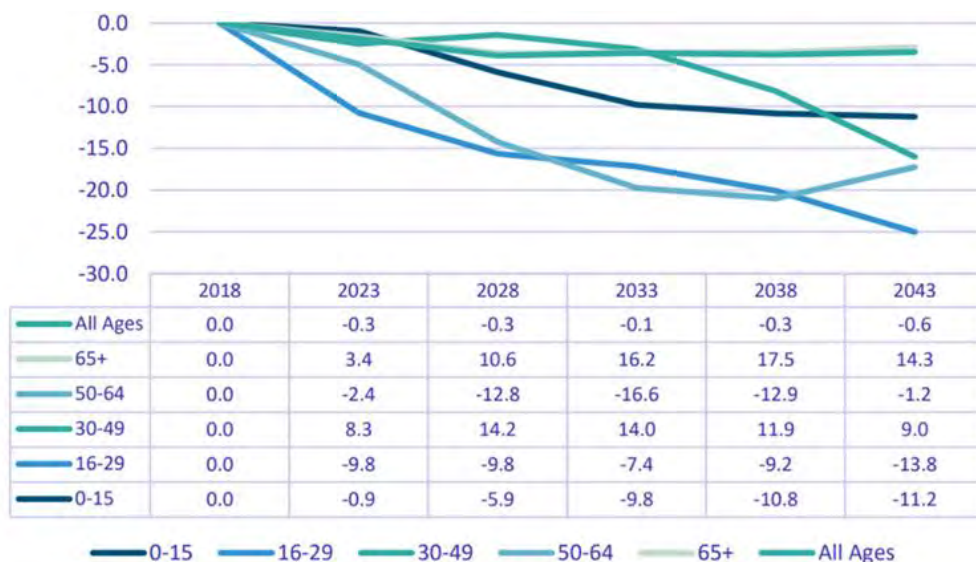


Figure 5.4: Dundee Projected Population Percentage Change by Age Group 2018 to 2043 (DED340)

5.13 Geographically, Dundee's population can be separated into various areas. Its eight Ward and Local Community Planning Partnerships (LCPPs) boundaries are commonly used, as set out in the map below. For data purposes the city is commonly broken down into 31 intermediate data zones (population thresholds of 2,500 - 6,000 household residents), and 188 data zones (population thresholds of 500 to 1,000 household residents).

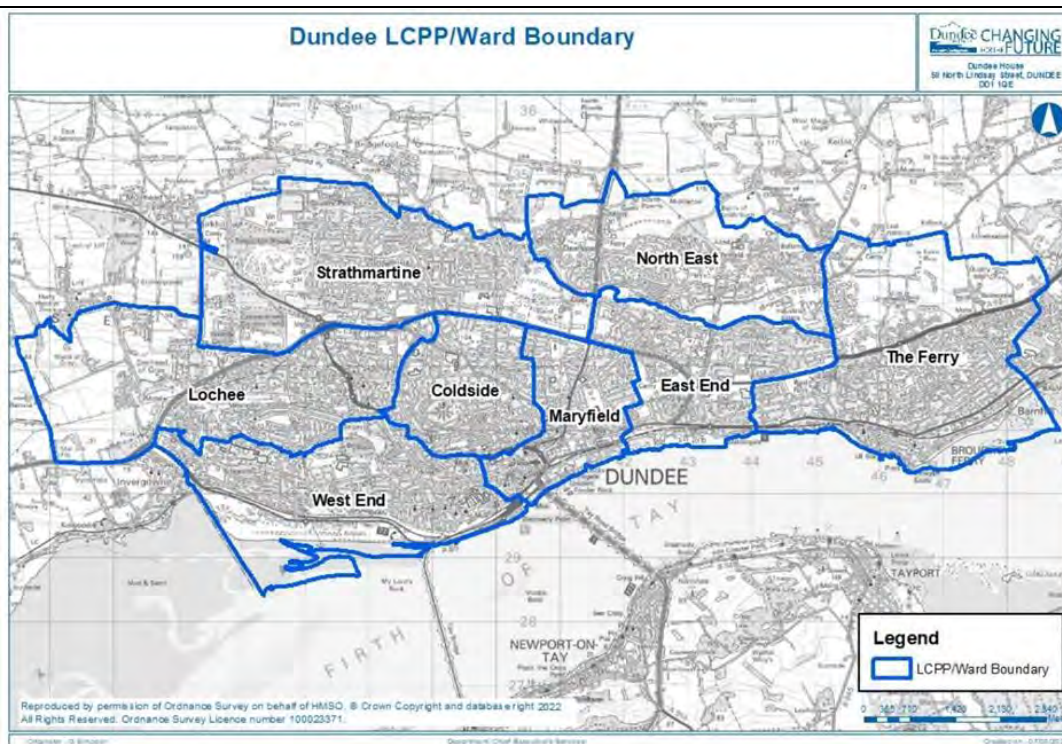


Figure 5.5: Dundee's LCPP/Ward Boundaries.

5.14 Data on ethnicity is currently only available from the 2011 Census and therefore it has some limitations. Dundee's population is predominately White British (89.4%) and 4.7% of people class themselves as 'White Other'. This includes people who were originally from Eastern Europe or from Ireland. 4% are from Asian backgrounds and 1% are African or Caribbean. Each Ward/LCPP area has varying ethnic diversities, as shown in the bar chart below.

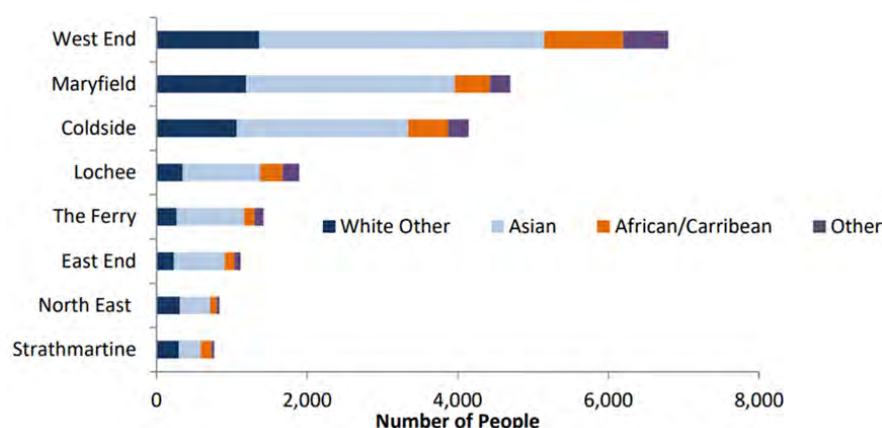


Figure 5.6: Dundee City Ethnic Minority Breakdown by Ward Area – Aged Under 65, DHSCP (DED340)

Health Inequalities

5.15 The summary presented throughout this section is compiled from the following evidence and data sources:

- DHSCP: Strategic Needs Assessment September 2021 ([DED340](#))
- DHSCP: Strategic Commissioning Framework 2023-2033 ([DED270](#))
- NHS Tayside: Director of Public Health Annual Report 2023 ([DED215](#))

- 5.16 Dundee does have high levels of poverty and other social issues that impact on people's health and wellbeing. Unfortunately, life expectancy for people in Dundee is getting shorter. There are also big differences between how healthy and well people are because of where they live, how much money they have, and who they are, for example, their ethnic origin, sexual orientation, disability or age. The city also has high levels of social issues that impact on the health and wellbeing of vulnerable people. This includes, drug and alcohol use, poor mental health, domestic abuse and other types of violence against women, and harm to other vulnerable adults and children.
- 5.17 The Scottish Index of Multiple Deprivation (SIMD) assesses deprivation levels based on seven domains: income, employment, education, health, access to services, crime and housing. A 2020 breakdown of Dundee's 20% most deprived areas is set out in the map below. There are 188 SIMD data zones in Dundee, of which 70 are ranked within the 20% most deprived in Scotland. 36.6% of Dundee's population lives in the 20% most deprived data zones (SIMD quintile 1). Overall Dundee is the fifth most deprived local authority area in Scotland, with only Inverclyde, Glasgow, North Ayrshire, and West Dunbartonshire having a higher level of population living in SIMD quintile 1.

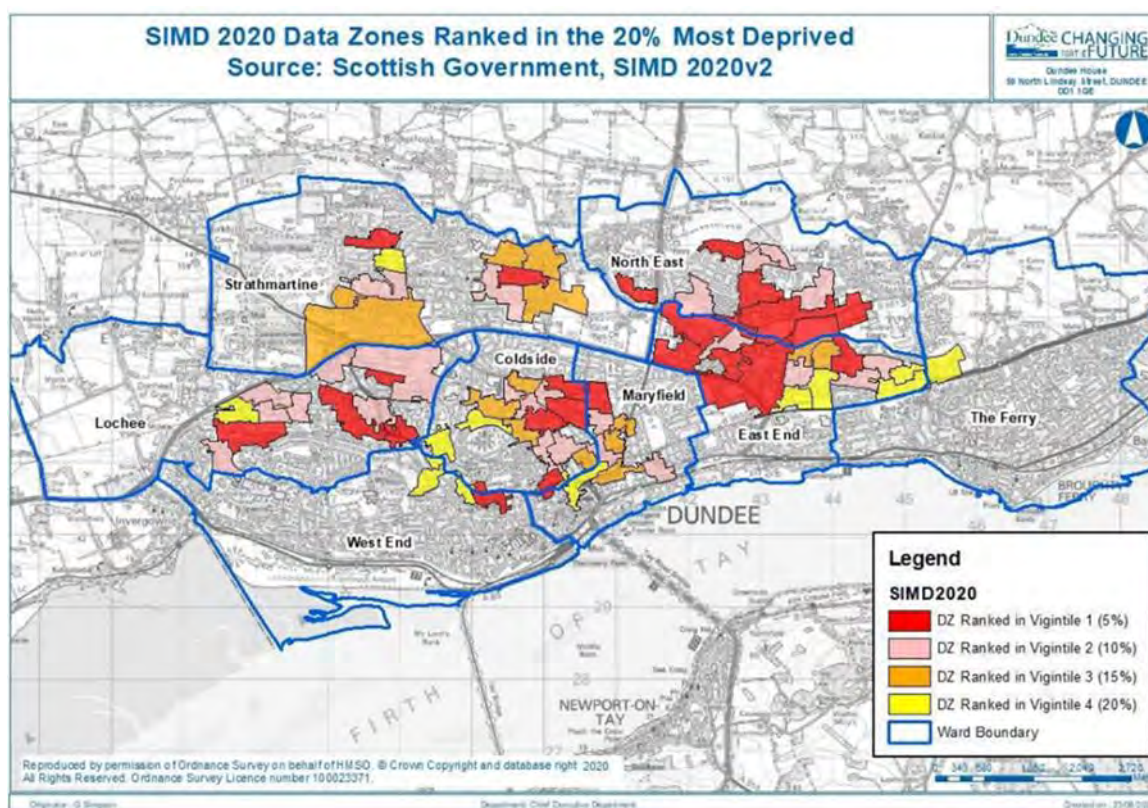


Figure 5.7: SIMD 2020 Data Zones Ranked in the 20% Most Deprived, DHSCP (DED340)

- 5.18 The following graph shows the percentage of people living in each Ward/LCPP ranked in the 20% most deprived data zones in Scotland. Four out of the eight locality areas are above the Dundee average of 36.6%. East End and Coldsides are the localities within Dundee which have the highest percentage of their population living in data zones ranked the 20% most deprived. Six out of the eight locality areas are above the Scottish average (19.5%).

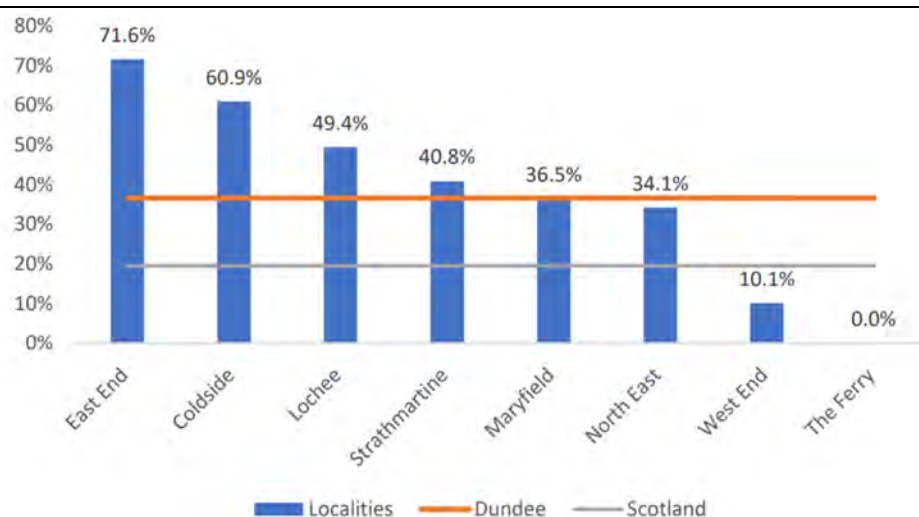


Figure 5.8: Percentage of Ward Populations in 20% Most Deprived Data Zones in Scotland 2020, DHSCP ([DED340](#))

5.19 On a positive note, the percentage of the population living in the 20% most deprived data zone has reduced in Lochee and Strathmartine since 2016, Lochee from 53.8% to 49.4% and Strathmartine, significantly, from 49% to 40.8%.

5.20 Key Health Inequality Headline Figures

- Dundee has the 2nd lowest life expectancy of all Scottish Local Authority areas.
- The median age of people living in Dundee (38 years) is almost 10 years lower than people living in Angus and Perth & Kinross.
- Within the local authority areas in Tayside, men and women who live in Dundee City have the lowest life expectancy. Growth in life expectancy has generally stalled in Tayside and it is now starting to show a notable slowly decreasing trend in Dundee's male population.
- Males born in the most deprived areas of Dundee are likely to live 14.1 years fewer than in the least deprived. Females born in the most deprived areas of Dundee are likely to live 11.2 years fewer than in the least deprived.
- Healthy life expectancy is decreasing for Dundee males, with men born currently anticipated to live only 55.9 years in good health on average. While males living in Dundee not only have the lowest life expectancy in Tayside, they also spend the least amount of time living in good health.
- Premature mortality is three times greater in the most deprived areas in Tayside than the least deprived. Drug and alcohol-related deaths and suicide disproportionately impact people living in deprived areas.
- Dundee's Accident and Emergency attendance due to alcohol related harm is 4 times higher in the most deprived areas of the city, and its drug related hospital discharges are 20 times higher in the most deprived areas of the city.
- Dundee's East End, Lochee and Coldside wards have the highest prevalence of people with mental health conditions, physical disabilities, learning disabilities and sensory impairment. These wards also have the highest proportion of residents classified as income deprived.
- People who are affected by poverty or poor social circumstances or who have a Protected Characteristic can find it more difficult to access health and social care services. For example, the convenience and physical challenges for the elderly or those with a disability to access public transportation infrastructure, or prohibitive travel costs affecting people living in poverty.

5.21 The summary presented throughout this section is compiled from the following evidence and data sources:

- DHSCP: Strategic Needs Assessment September 2021 ([DED340](#))
- DHSCP: Strategic Commissioning Framework 2023-2033 ([DED270](#))
- NHS Tayside: Director of Public Health Annual Report 2023 ([DED215](#))
- Protecting People Annual Report Summary 2022-2023 ([DED237](#))
- National Guidance on Action to Address Suicides at Locations of Concern ([DED200](#))
- A Connected Scotland ([DED003](#))
- Recovering our Connections 2023-2026 ([DED243](#))

5.22 General Health

- Due to inequalities, particularly deprivation, some people in Dundee have a need for higher levels of health and social care support at an earlier stage than people of the same age who live in more affluent parts of the city.
- Across all Local Community Planning Partnerships, the average number of prescription drugs used to treat diabetes, hypertension and heart failure has increased since 2015/16. Importantly, most of the development of these conditions is preventable.
- Hospital admissions due to long-term conditions are higher for the most deprived areas of the city, especially for asthma, chronic obstructive pulmonary disease, and coronary heart disease.
- Since 2016 the number of admissions to hospital due to a stroke has been increasing. In 2016 there were 639 hospital admissions, but this has steadily increased to 1,001 admissions in 2022.

5.23 Physical Activity and Child Healthy Weight

- Fewer than one fifth of Dundee Citizens reported that they undertook moderate physical activity for at least 30 minutes per day, 4+ days per week.
- 13.5% of Primary 1 age children in Dundee were at risk of becoming overweight and 11.3% were at risk of obesity.
- Dundee has the 8th lowest number of Primary 1 children in Scotland with a healthy body weight.
- Children living in the most deprived areas in Dundee are more than twice as likely to be at risk of obesity in comparison to those in the least deprived areas.
- Obesity in children and adults increases the risk of high blood pressure and high cholesterol which are risk factors for heart disease; Type 2 diabetes; breathing problems, such as asthma and sleep apnea; and joint problems such as osteoarthritis and musculoskeletal discomfort.
- Childhood obesity is also associated with psychological problems such as anxiety and depression; low self-esteem and lower self-reported quality of life; and social problems such as bullying and stigma.

5.24 Diabetes

- 5.5% of the Tayside population are living with type 2 diabetes.
- The incidence of type 2 diabetes has increased by 48% over the last ten years.
- It is estimated that 1 in 3 adults are at high risk of developing type 2 diabetes.
- Weight loss (and preventing weight gain) is central to the prevention, management and (in some cases) reversal of type 2 diabetes.

5.25 Housing and Homelessness

- Dundee has the 8th highest rate of homelessness applications in all Scottish Local Authority areas.

- Dundee has fewer owner occupiers and more people living in rented accommodation than the rest of Scotland.

5.26 Drugs and Alcohol

- Dundee has the 2nd highest drug death rate of all Scottish Local Authority areas.
- 38 drug deaths in 2022 (25.6 per 100,000 population).
- 37 alcohol-specific deaths in 2022 (24.9 per 100,000 population).
- Rates of hospital admission due to alcohol and drug use are high, with a higher proportion of people who need support living in the most deprived areas of the city.

5.27 Cancer

- The number of people living with or dying from cancer is rising. It is estimated that 1 in 2 people will be diagnosed with (but not necessarily die from) a cancer in their lifetime. The prevalence of cancer varies by deprivation and age group.
- High rates of cancer and of long-term and multiple health conditions has increased demand for palliative and end of life care. This includes enhanced support for unpaid carers providing end of life care, as well as bereavement support.

5.28 Elderly People

- Dundee expects to see a 38% increase in the population aged 75 years and over by 2043.
- Due to inequalities, particularly deprivation, many people in Dundee enter older age with pre-existing health conditions.
- Around 1 in 10 people aged 65 or over has dementia. Due to the pandemic the proportion of people who received a minimum of 12 months post diagnostic support after their diagnosis reduced from 97% to 68%.
- Dundee has the highest admissions to hospital rate for falls in all Scottish Local Authority areas. As of 2020 the rate was 30.7 per 1,000 people aged 65 and over.
- For people receiving home care services, an average of 45% had an emergency admission to hospital in the 28 days before the service started.
- In 2021/22 half of the people admitted to care homes had experienced an emergency admission to hospital within the 28 days beforehand.

5.29 Mental Health

- Dundee has the 5th highest rate in all Scottish Local Authority areas of adults (aged 16-64 years) who reported in the 2011 Census that they are living with a mental health condition.
- Isolation and reduced mobility during the pandemic for people who were already frail increased demand for support amongst those already receiving services and also for those who had not previously required support.
- 1 in 5 respondents to the Engage Dundee survey reported a worsening of existing mental health conditions, this was highest for people aged 25-34.
- In Dundee, in 2022, 29 people died by probable suicide, this is an increase of four people from 2021. The rate of suicide in Dundee was higher than the Scottish average and third highest in Scotland. Suicide rates for males are still twice as high as females however it is worth recognising that female deaths across Scotland in 2022 increased by 18 and males decreased by 9 on the previous year.

5.30 Public Health Scotland have produced online 'National guidance on action to address suicides at locations of concern', which includes guidance around planning considerations ([DED200](#)). There may be organisational and/or public resistance towards proposed actions which address locations of concern, such as visual or aesthetic disruption to an iconic natural or historical site, a lack of awareness about intervention effectiveness, inconvenience to the public, or cost and cost-effectiveness. Overcoming this

resistance may require community and key stakeholder consultation, which should emphasise the need to promote actions based on a moral and ethical duty to prevent deaths. Detailed guidance is also provided regarding integrating suicide prevention measures into infrastructure development ([DED200](#)).

5.31 Social Isolation and Loneliness

- Social isolation and loneliness (SIAL) is a public health issue within Scotland, with 1 in 10 people often feeling lonely.
- SIAL can potentially impact anyone at every age and stage of life, but specific groups within the population are at greater risk, including the young, elderly, disabled, deprived, digitally excluded, people living alone, people lacking access to green spaces, and those suffering from health and mental health issues.
- There is strong evidence that SIAL increases the risks of older adults developing physical health conditions such as cardiovascular disease and stroke, and mental health conditions such as cognitive decline, dementia, depression, anxiety, suicidal ideation and suicide. Regardless of age there is a risk of developing certain mental health problems, such as anxiety and depression, which is associated with increased thoughts of suicide.
- 'A Connected Scotland' is the Scottish Government's national strategy for tackling the issue, building social connections, and improving health and wellbeing.
- Everyone has a role to play in tackling this issue, including individuals, communities, local authorities, health boards and other community planning partners, third sector and social enterprise, and businesses.
- The planning system has a vital role to play in delivering high-quality, connected, places for people. High-quality buildings, infrastructure and spaces in the right locations helps provide choice over where to live, style of home, access to amenities and services, and choice to live more active, engaged, independent and healthy lifestyles. Such positive places help to support vibrant communities with opportunities for greater social interaction for people of all ages.
- Creating a network of 20-minute neighbourhoods can help tackle SIAL through better connected communities where people are able to meet the majority of their daily needs by walking, wheeling, cycling or sustainable transport.

5.32 Domestic Abuse and Violence Against Women

- Dundee has the highest prevalence rate of domestic abuse in all Scottish Local Authority areas.
- Third sector organisations in 2022/23 supported 2,191 women and 211 children and young people.

5.33 Carers

- 62% of adult carers supported by local carer services provide an average of 50 or more hours of care per week. 72% of carers reported poor mental health, and the same percentage said their physical health had got worse.
- As a result of the pandemic, 84% of carers reported negative impacts on physical, mental and social wellbeing, and 60% reported feeling socially isolated.
- From school data there are 742 young carers in Dundee.
- 65% of young carers supported by local carer services provide up to 19 hours of care per week.

5.34 Self-Care: Supporting people to look after their health and wellbeing

- Self-care is a strategic priority within the healthcare system, which aims to help everyone to independently look after their own health and wellbeing, including through early intervention and prevention.
- Research shows that helping people understand and manage their health and wellbeing helps them make healthier choices, improves their overall health outcomes and reduces the need for them to receive emergency care at hospital. The impact of this type of support is even better when it is targeted at people that need it most – so it also helps to reduce health inequalities.
- Supporting people to make healthier choices, prevent poor health and wellbeing and look after themselves when they are unwell reduces the number of people who need help from health and social care services. This means that those services can focus on supporting people who have the highest need, who have long-term health needs and on providing new services.
- Key change to support self-care requires that more people, especially disadvantaged groups, are accessing a wider range of health, wellbeing and healthy lifestyle activities across the city.

Health Infrastructure

5.35 The summary presented throughout this section is compiled from the following evidence and data sources:

- DHSCP: Strategic Commissioning Framework 2023-2033 ([DED270](#))
- DHSCP: Property Strategy 2022-2025 ([DED236](#))
- DHSCP: Property Strategy 2022-2025_April 2023 Update ([DED361](#))
- DHSCP: Property Strategy 2022-2025_February 2025 Update ([DED362](#))
- DHSCP: General Practice Premises Strategy 2022 ([DED129](#))
- DHSCP: General Practice Strategy 2024 to 2029 ([DED130](#))
- NHS Scotland Letter to NHS Boards: Whole System Infrastructure Planning ([DED214](#))

5.36 Health and Social Care services and supports are delivered from places that are owned by Dundee City Council and NHS Tayside but can also be buildings owned by the third and independent sector. Across the Dundee Health and Social Care Partnership services and supports are delivered from a wide range of different places, as outlined in the table below.

Property			
21 General Practices	4 Hospitals	4 Care Homes	4 Day Centres
1 Palliative Care Unit	2 Respite Units	1 Equipment Store	6 Office Bases
1 Records Store	7 other community-based service delivery sites	42 community-based venues used by social care teams	Shared sites of service delivery in Angus and Perth & Kinross
Service delivery sites in the third sector and independent sector			

Figure 5.9: Dundee Health and Social Care Partnership - Service Delivery Locations, DHSCP ([DED270](#))

(Note: GP figure amended from 23 to 21 to reflect the recent closure of GP premises)

5.37 Following assessment of the properties, the key issues are that many areas are underserved when considering property alignment with population density and areas of deprivation, and the condition of many of the assets and premises are not fit-for-purpose. The long-term ambition is that health and social care services and supports will be delivered from places that are modern, accessible, sustainable, fit for purpose and are used to their maximum potential. There are some important factors that will make it challenging to do this:

- Dundee City Council and NHS Tayside are both working to reduce the number of premises they have in the city and the physical condition and design of some properties is not suitable for modern ways of delivering services.
- Limited money in Dundee City Council and NHS Tayside to invest in and improve community-based buildings from which health and social care services are delivered.

5.38 However, developments in digital technology and changes in the way that the health and social care workforce work are factors that will help to make better use of the buildings that are available to the Health and Social Care Partnership in the future.

5.39 Further detail on the property context, future plans and progress is set out in the DHSCP's: General Practice Premises Strategy 2022 ([DED129](#)) and the strategy updates: Property Strategy 2022-2025_April 2023 Update ([DED361](#)), and Property Strategy 2022-2025_February 2025 Update ([DED362](#)). The key objectives of the strategy are:

- To gain best value from our use of property.
- To ensure that health and social care services are provided in and from accessible, sustainable and fit-for-purpose, modern buildings.
- To ensure that health and social care services are provided from premises that create environments that support trauma informed ways of working and reducing inequalities (including protected characteristics, fairness and wider health and social work inequalities).
- To enhance provision of health and social care services in local communities.

- To ensure that health and social care services are provided from environments that ensure the wellbeing of our workforce.
- To rationalise our estate in order to reinvest savings into frontline services.

5.40 The key actions from the strategy include the need to:

- Agree a process for loans, leases and funded modifications.
- Agree a programme of works in relation to GP premises, within the context of their local community.
- Look at areas that are underserved and explore options.
- Build on existing work to use clinical space more creatively.
- Scope out the clinical space requirements for planned care provision in the community.
- Replace Constitution House.
- Scope out space requirements for community-based services.
- Scope out the need for clinical space within care homes and day services.
- Grow partnership shared workspaces and opportunities for coworking in Dundee as a key part of our premises strategy.
- Identify IT solutions to some of the barriers to partnership working.

5.41 In alignment with NPF4 policy 15, the DHSCP's: General Practice Strategy 2024 to 2029 ([DED130](#)) identifies 20 minute neighbourhoods as a key guiding principle in the delivery of their strategy. This means they intend to provide care closer to home and align with the green agenda by reducing the need to travel and thereby reducing travel costs for patients. The strategy also adopts a Place Based Care approach to the delivery of GP services. The ambition is to bring organisations across the city together around the population they serve. This provides a mechanism to share and combine resources and more importantly to make more effective use of the resources available. As an example, having Third Sector organisations in general practice providing dedicated skilled support in drug use recovery.

5.42 The General Practice Strategy is underpinned by various activities, which includes the following:

- Focus on prevention, self-care, and early intervention: acknowledging the impact of transformational changes across the city including air quality impact, and access to active travel infrastructure and green and blue spaces.
- Address inequality and inequity: engaging with children, particularly within deprived areas of the city, to influence and encourage active lifestyles and good dietary habits. Recognising good health is a community endeavour and includes access to healthy food, and other initiatives e.g., streets for play and access to cycle lanes.

5.43 The General Practice Strategy establishes four broad criteria to assess work programme priorities:

- Looking towards a community focused model delivering health and social care.
- Ensuring premises are of good quality and fit for purpose.
- Providing support to general practice to enable sustainability.
- Ensuring appropriate geographical coverage.

5.44 The geographical spread of Dundee's 21 GP premises is uneven, with only 3 practices north of the Kingsway Road (A90) and a group of practices concentrated within the Stobswell area, as shown in the map below.

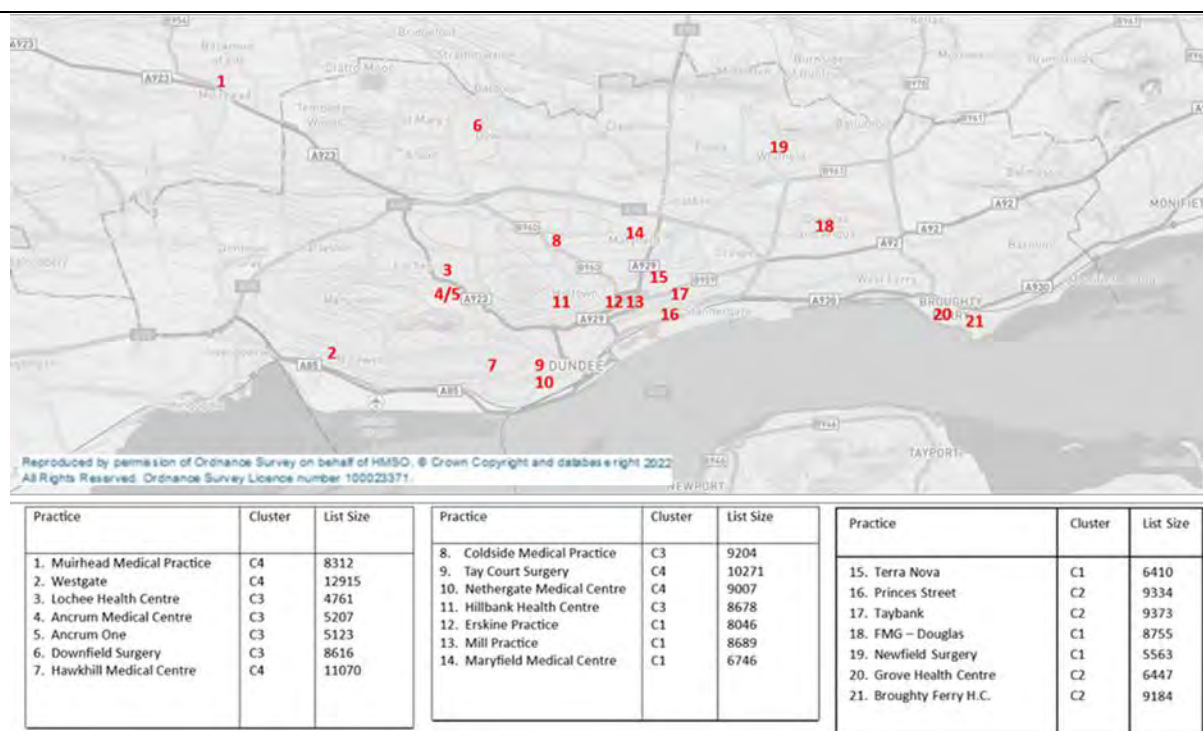


Figure 5.10: DHSCP's: Location of Dundee General Practice Premises, ([DED129](#))

(Note: map and table amended to reflect the recent closure of GP premises.)

5.45 The current picture for Dundee's GP premises highlights that around 50% of the practices do not consider their premises fit for their present needs, and a similar number highlight a lack of space hampers opportunities for change or innovation. There is a need for remedial work to improve the space available and the amenity. This is compounded by increasing demand on services, by the closures of neighbouring practices and an increasingly older population with greater health needs. The premises tenure is also impacting on GP recruitment and retention as the profession seeks freedom from premises liability. The ambition for place based or community setting care is in contrast with the reality that many people in Dundee are not registered with the GP practice closest to their home and patients choose to travel across the city to attend GP appointments.

5.46 In line with national, regional and local policy, the DHSCP believes that by working together across organisations the population of Dundee can be healthier, with fewer inequalities and able to provide high-quality cost-effective services that align with the needs of the city's population. This includes moving to a locality-based model, where general practice is part of a wider health and social care eco system providing care to members of its community. With more services looking to move to primary care and increasing multi-disciplinary working, a key enabler will be GP premises that have fit for purpose space.

5.47 The map below shows the new housing planned for Dundee in relation to general practice locations and their space issue status. The boundaries between NHS and Council services are not coterminous.

- 5.51 The second planning phase 'Preferred Way Forward Option' is more relevant to the LDP process as it requires a longer-term service-informed infrastructure investment strategy for the next 20-30 years. Importantly, it is recognised that NHS Boards may be at different stages of planning and existing Clinical Strategies and Medium Term Plans can be used to inform this exercise, this information is covered in the preceding evidence. NHS Tayside have advised that their 'Whole System Infrastructure Plan' is scheduled to be progressed in accordance with Scottish Government guidance. The second planning phase 'Preferred Way Forward Option' is scheduled to commence during 2026 and will provide relevant information for the development of the next LDP.
- 5.52 Investment plans for both planning phase options will need to be prioritised to reflect realistic expectations of available capital and revenue funding. The Health Infrastructure and Sustainability Division at Scottish Government will advise NHS Boards on appropriate funding assumptions to be made.
- 5.53 To allow Local Authority Planning teams to understand and address the spatial implications of health infrastructure plans within the Tayside area, the 'NHS Tayside Infrastructure Group' has been established with senior representatives from NHS Tayside, and Health and Social Care Partnership (HSCP) representatives and Planning team officers from Dundee, Angus, and Perth & Kinross Councils. The inception meeting was held on the 19th of December 2024, and regular meetings have taken place every two months. The group recognises that there are positive opportunities to work in long-term partnership to develop the next LDP and to integrate health facilities into communities, including models of co-location within public facilities.

DHSCP: Property Strategy 2022-2025_February 2025 Update ([DED362](#))

- 5.54 This update recognises the Scottish Government's requirement for NHS Boards to develop Whole System and Service Infrastructure Plans, as set out in the previous section. There is an ambition for a new GP Practice to be established within Dundee city centre and to be considered for funding from the Whole System Programme. This is in response to a reduction in the number of GP practices in the West End Ward from four to three in the last two years, and increased demand for primary care services (including from an expanding student population). Exploratory work has begun to support this, including the drafting of a Statement of Need in consultation with City Council property and planning colleagues.

GIS Health Infrastructure Data

- 5.55 Dundee City Council's Planning Team have acquired and mapped all of the publicly available health infrastructure spatial data from the following sources. We plan to include this data in our GIS Liveable Neighbourhoods Tool, which is covered in more detail within Schedule 7 Infrastructure First and Local Living, (para. 7.29 to 7.35). This will help us understand the accessibility of health services and facilities within Dundee's communities.

- **Public Health Scotland (2025)** (Information Analysts NHS Tayside) – data point locations for GP practices (patient list numbers available).
- **NHS 24 (2025)** – data point locations for opticians, dentists, sexual health clinics, health and wellbeing centres, pharmacies, GP practices, hospitals, and accident and emergency.

- **OS Open Map** (2024) (Local Important Buildings) – polygon location data on Hospice, Hospital, and Medical Care Accommodation (long term medical accommodation and medical care, e.g. nursing homes and care homes).

Dundee's Food Environment

Food Availability

5.56 To understand Dundee's food environment there are a broad range of sources that need to be considered, including:

- Supermarkets
- Mini-markets
- Convenience stores
- Corner shops
- A diverse community food network
- Community gardens and growing spaces (crossover with community food network)
- Allotments
- Fast food and takeaway outlets

5.57 The above sources provide a combination of food for cooking and food for direct consumption. In general terms, the availability of these food sources (both healthy and unhealthy) to Dundee residents is primarily influenced by location, transportation options, and affordability.

5.58 Dundee is generally well served by large supermarkets, predominantly located around the Kingsway (A90); and a variety of mini-markets, including LIDL, ALDI and Iceland etc., dispersed throughout the city. These sources provide a diverse array of foods, including healthy fresh food options, however accessibility and affordability determine who can use these sources.

5.59 With reference to the Dundee Cycling Strategy 2019 ([DED078](#)), Scottish Household Survey data shows that 44.8% of Dundee households do not have access to a car for private use and 45.9% of the adult population do not have a driving licence. Therefore, car-less residents, unable to reach these markets, are more likely to have to depend on what's local to them, which can vary significantly depending on where you live. This can result in a dependence upon corner shops, convenience stores and takeaway outlets. In such instances, food prices are often high, products are highly processed and unhealthy, and fresh fruit and vegetables are poor or non-existent. These locations are often referred to as '[food deserts](#)' as affordable, nutritious, fresh food is virtually unobtainable, or as '[food swamps](#)' where there is plenty of food available, but it is energy dense and nutrient poor.

5.60 Nonetheless, only considering the availability of commercial food does not provide the entire picture of food availability within an area. The following sections covering Dundee's community food network and growing opportunities provide further insight.

3.2 Dundee Community Food Network ([DED388](#))

5.61 Supermarkets and mini-markets are not the only source of fresh food in the city. With rising poverty, the cost-of-living crises, and a drive to reduce food waste, various alternative sources of food have emerged in Dundee. Faith in Community Dundee's 'Dundee Community Food Network' provides a helpful database and map of alternative food sources, which include:

- Community Cupboard/Fridge
- Community Gardens
- Drop-In Café
- Food Parcel locations
- Foodbanks
- Larders
- Lunch/Supper Clubs
- Takeaway Hot Food Locations (not fast-food takeaways)

5.62 For Dundee's most deprived residents the location of supermarkets, corner shops, convenience stores and takeaway outlets is becoming virtually irrelevant as they are fully dependent upon the city's Community Food Network. Most primary schools now also have some kind of food provision which is accessed by parents. These vital food sources are having an impact on the nature of Dundee's food environment, and, depending on which variables are considered, may determine whether you are living in a food desert/swamp or not. Further analysis through our in-house GIS Liveable Neighbourhoods Tool may help to clarify the situation, see Schedule 7 Infrastructure First and Local Living, (para. 7.29 to 7.35) for further information on the tool.

Food Growing Opportunities

5.63 Community engagement during preparation of Dundee's City Plan established community growing as a priority for local people in all wards. This is borne out in the plan as an action under the Building Stronger Communities theme by committing to expand community growing projects, and reflected in the vision statement of the Local Food Growing Strategy Dundee (LFGS) ([DED182](#)):

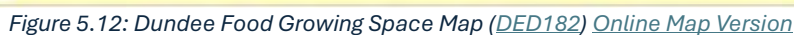
5.64 "Dundee will build on its enviable resource of community growing spaces and allotments, working with communities, local people and organisations to enable them to access 'grow your own' opportunities, whilst recognising the value of such growing spaces in reducing food insecurity."

5.65 The LFGS aligns with NPF4 and several of the Scottish Government's National Outcomes and adheres to the 'grow your own' requirements set out in the Community Empowerment (Scotland) Act 2015. However, there are key challenges around space provision, participation, and scale when it comes to reducing food insecurity.

5.66 Over many years the City Council has developed a system of leased allotment sites managed by independent allotment associations, as well as directly managing a number of allotment sites. As of 26th February 2024, the waiting list for City Council allotments stands at 405 applicants, with a supply of only 78 plots. Therefore the City Council is not in compliance with the Community Empowerment (Scotland) Act 2015 - Part 9 Allotments ([DED389](#)) as our statutory duty to provide allotments is currently not being fulfilled. Additional allotment sites need to be identified to meet the demand. Dundee does also host several privately-run allotment sites that help support the city's needs.

5.67 There are many established community growing spaces in Dundee, often located in areas of deprivation and regeneration. The City Council's Environment team strive to promote the establishment of further community growing spaces in the more deprived parts of the city as well as promoting the grow-your-own approach in private spaces, school grounds, and community centres etc. The LFGS intends to explore further opportunities for community growing through the next LDP, specifically through policy to support growing spaces in new development. These moves towards ultra-local, seasonal, food production can help to supplement poor diet with nutritious food as well as having valuable impacts on social isolation, peer support, and mental health issues. Positive progress is being made and there are many more projects and initiatives in the pipeline, however the cultural shift towards own-grown food

5.68 The following map from the LFGS identifies the city's numerous growing spaces, a larger version of this map is available via this [link](#). The Dundee Community Gardens Map 2024 ([DED393](#)) is also available on Dundee City Council's website. This data will contribute towards the previously mentioned GIS Liveable Neighbourhoods Tool to help provide a better understanding of food availability in Dundee. See Schedule 7 Infrastructure First and Local Living (para. 7.29 to 7.35) for further information on the tool.



Food Outlet Clusters

Dundee District Centres	No. of Fast-Food Takeaways
-------------------------	----------------------------

Albert Street	6
Broughty Ferry	7
Hilltown	13
Lochee	5
Perth Road	6

Figure 5.13: Number of Fast Food Takeaways within Dundee's District Centres ([DED247](#))

5.71 The Scottish Parliament Information Centre's article [Fast Food Booming – A Cause for Concern?](#) ([DED120](#)) provides a national and Dundee perspective on the rise in takeaway outlets. Reference to [Office for National Statistics](#) (ONS) data from 2018 shows that Dundee had the 4th highest takeaway density in Scotland, as shown in the graph below. Takeaway outlets in the data are defined by the [UK Standard Industrial Classification of Economic Activities 2007](#), under classification '56.10/3 Takeaway food shops and mobile food stands'.

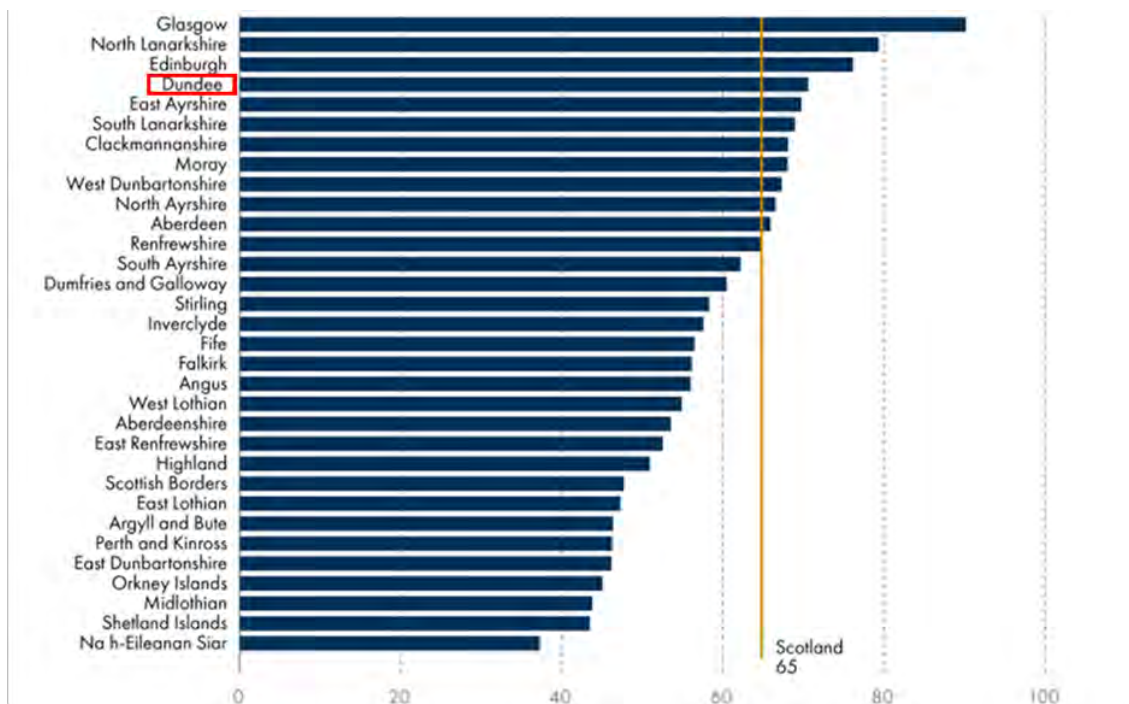


Figure 5.14: Takeaways per 100,000 Population by Scottish Local Authority Areas 2018 ([DED120](#))

5.72 The article includes the chart below which demonstrates the correlation between takeaway intensity relative to population share and levels of deprivation within Local Authority areas, using the Scottish Index of Multiple Deprivation. This chart suggests that Local Authorities with relatively high proportions of data zones in deprivation are likely to have an over-representative share of takeaways relative to their national population share. Areas like Glasgow, North Lanarkshire, and Dundee have both an over-representative share of takeaways relative to population share and relatively high levels of deprivation.

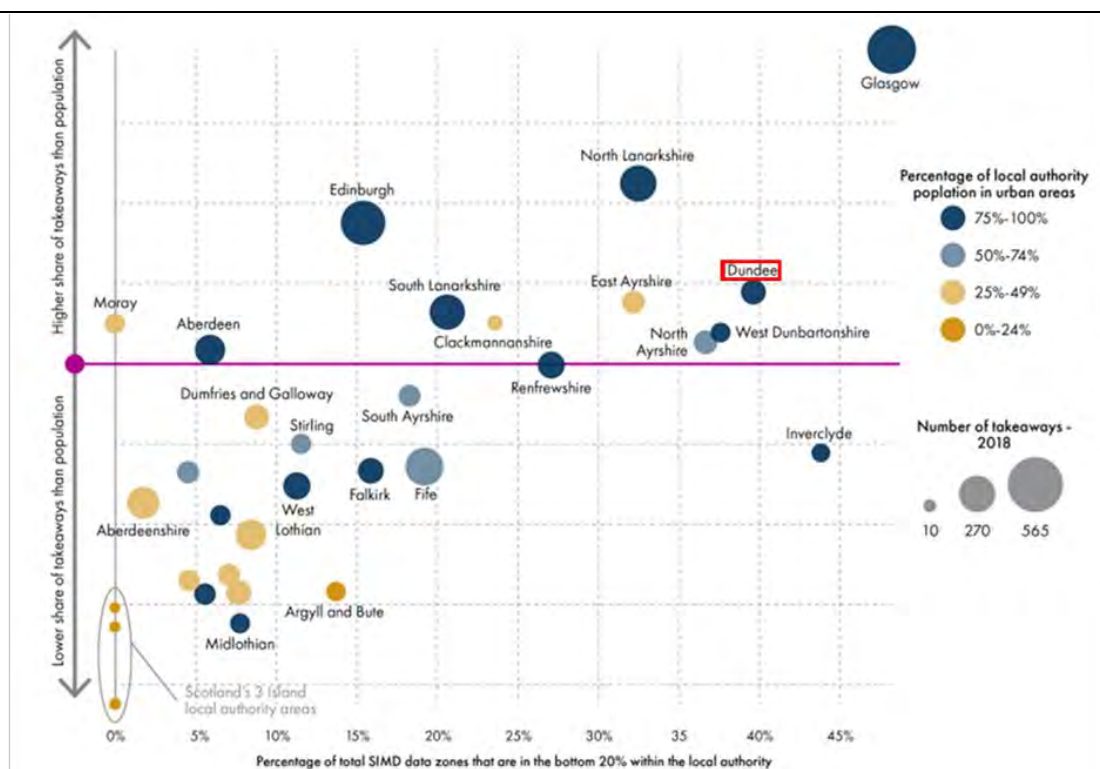


Figure 5.15: Relationship Between Takeaway Density, Population, and Deprivation within Scottish Local Authority Areas ([DED120](#))

5.73 Since this article was published, further ONS data on takeaways has been released up to 2023. From a city-wide perspective Dundee had a total of 85 takeaways in 2010 and by 2023 the total rose to 125, an increase of 47%. The table below provides an indication of how the number of takeaways in 2023 were distributed across Dundee at Scottish Intermediate Zone level.

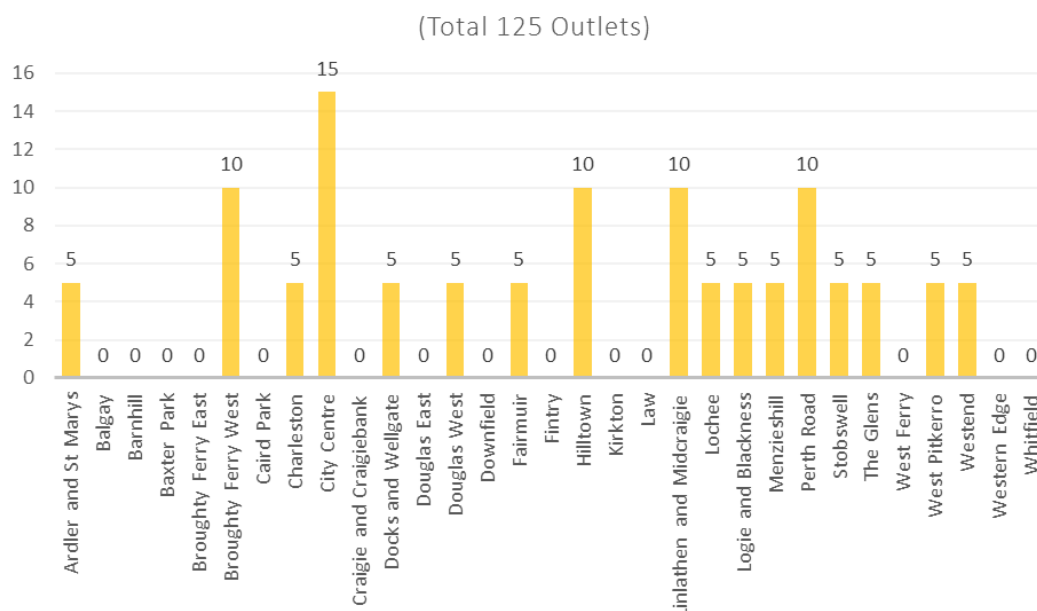


Figure 5.16: Number of Fast-Food Takeaway Outlets in Dundee by Intermediate Data Zones 2023 Office for National Statistics Scotland.
Note: 125 outlets is considered to be the most accurate published estimate. The discrepancy between this total and the sum of the individual zone-level values (115 units) is a result of the disclosure control method used by [NOMIS](#).

5.74 The above data is useful to show trends where takeaway outlets are clustering, however, it is less relevant when considering direct consumption as the rise in delivery services means that people no longer rely on very local provision.

Potential pollutants

Major-Hazard Sites

5.75 There are several major-hazard sites within Dundee, which are predominantly located within the coastal docklands area to the east of the city centre. These sites correspond with the storage and processing of specific hazardous substances. To identify any potential risks associated with proposed development, the Health and Safety Executive (HSE) have established consultation zones around major-hazard sites. Any planning applications which fall within consultation zones require consultation with HSE prior to the determination of the application. Dundee City Council and HSE hold maps which identify all of the major-hazard sites and their consultation zones.

5.76 There are no major accident hazard pipelines in Dundee.

Pollution and Local Level Nuisance

5.77 The following sections cover the monitoring and control measures established for both city-wide pollution concerns, and local level nuisance, associated with air quality, noise, odour, and light.

Air Pollution

5.78 To allow comprehensive monitoring and improvements to Dundee's air quality the whole of Dundee's local authority boundary is designated as an [Air Quality Management Area](#). The detailed measures carried out to assess, monitor, and improve air quality across the city are set out in Dundee City Council's Air Quality Action Plan ([DED014](#)). Consultation on a draft 2024 Air Quality Action Plan was carried out during 2025, and the draft is intended to be taken to Committee for approval during early 2026. Once adopted the new Air Quality Action Plan will be taken into consideration as part of the LDP evidence base.

5.79 Annual progress reports are produced, which set out the progress made on the broad range of measures within the 2011 Air Quality Action Plan, and report on the air quality monitoring carried out the previous calendar year and any developments or approved major planning applications that may have a future impact on air quality. All of the annual progress reports can be viewed online via this [link](#).

5.80 Dundee City Council's current LDP2019 Supplementary Guidance - Air Quality and Land Use Planning ([DED015](#)) reflects the 2011 Air Quality Action Plan, and provides additional guidance on air quality issues in relation to proposed development. As with the 2011 Air Quality Action Plan the next version will be considered as a material consideration in the determination of planning applications.

Cleaner Air for Scotland 2 - Towards a Better Place for Everyone ([DED028](#))

5.81 The Cleaner Air for Scotland 2 strategy sets out the Scottish Government's air quality policy framework and establishes a series of actions to deliver further air quality improvements. The important role that placemaking and 20-minute neighbourhoods play in improving air quality is highlighted within the strategy. As well as creating places and communities that are healthier, more vibrant, and more sustainable, giving people the ability to meet most of their daily needs via safe routes for walking, cycling, and public transport options reduces car dependency and improves air quality.

Noise Pollution

5.82 The Environmental Noise (Scotland) Regulations 2006 establish the requirement to manage environmental noise. The legislation makes two key obligations:

- Strategic noise maps must be produced for major roads, rail, airports and industry; and
- Noise Action Plans are produced to manage noise.

5.83 Informed by Round 2 of Scotland's Noise mapping process, the 'Scottish Government: Dundee Agglomeration - Noise Action Plan' ([DED323](#)) established three Noise Management Areas and four Quiet Areas for Dundee, which are identified within the committee report 'EU Environmental Noise Directive - Action Planning Update (Report 166-2015)' ([DED116](#)), and acknowledged within Dundee's current LDP2019 under Policy 39: Environmental Protection (). No new Noise Management Areas or Quiet Areas were identified during Round 3 of the Noise Mapping process. Round 4 of the Noise Mapping process has been carried out and new noise action plans are currently being drafted. Dundee's new noise action plan is scheduled to be adopted during 2026 and will be taken into consideration as part of the LDP evidence base. Further information can be found on [Scotland's Noise](#) website.

Odour Pollution

5.84 There is no local data on odour pollution. The Scottish Environment Protection Agency (SEPA) regulate a variety of activities and practices in a bid to reduce and prevent offensive odours. Further information can be found on the SEPA's [Odour](#) webpage.

Light Pollution

5.85 There is no local data on the effects of light pollution on our night sky, and there are currently no measures in place for controlling or complaining about light pollution. Further information is available on the [Commission for Dark Skies](#) website.

Local Level Air, Noise, Odour and Light Nuisance

5.86 Local level air, noise, odour and light nuisance affecting existing or new receptors (e.g. residences, businesses, public and private spaces etc.) from new development or changes to existing development is investigated and mitigated through Dundee City Council's Planning Enforcement, and Development Management processes. For proposed development the 'agent of change' principle applies, whereby, if there is likely to be an effect on existing or new receptors the applicant is required to demonstrate both that they have assessed the potential impact and that the proposed design incorporates appropriate measures to mitigate this impact.

Summary of Stakeholder Engagement

Pre Topic Paper Consultation

5.87 From August 2023 onwards a health and safety stakeholder working group was established during the early stages of the evidence gathering process. As set out in the list below, the group consisted of internal Dundee City Council representatives, external organisations, and key agency representatives with specific responsibilities and interests in health and safety. Through multiple emails, discussions and meetings, these experts assisted in developing a robust and agreed evidence base which informed the topic paper.

Internal

- DCC Public Health
- DCC Health and Wellbeing
- DCC Community Learning & Development
- DCC Environment

External

- NHS Tayside
- Dundee health and Social Care Partnership
- Public Health Scotland

Topic Paper Consultation

5.88 The Health and Safety Topic Paper (DER005) was published for consultation between 24th April 2024 and 31st May 2024 and forms the basis for the 'Summary of Evidence'. All stakeholders involved in the preparation of the topic paper were also formally consulted on the published topic paper.

Post Topic Paper Consultation

5.89 Formal responses to the topic paper consultation were assessed and appropriate changes have been incorporated into the Summary of Evidence. Where consultees disputed any of the submitted evidence, resolution email correspondence was conducted to justify our methodology/ position, or to confirm amendments/ additions in alignment with comments.

5.90 Ongoing dialogue with the Planning teams from neighbouring Local Authorities during this period led to the establishment of the 'NHS Tayside Infrastructure Group' during late 2024. The group consists of senior representatives from NHS Tayside, and Health and Social Care Partnership (HSCP) representatives and Planning team officers from Dundee, Angus, and Perth & Kinross Councils. This collaborative working allows the Planning teams to better understand and address the spatial implications of ongoing developments in healthcare infrastructure planning within the Tayside area. Regular meetings are conducted every two months, and the group recognises that there are positive opportunities to work in long-term partnership to develop the next LDP and to integrate health facilities into communities, including models of co-location within public facilities. Working closely with senior NHS Tayside representatives has also been beneficial in reaching agreement on the healthcare evidence submitted within the Summary of Evidence.

Engagement Summary Table

5.91 The following table identifies engagement with stakeholders, from the topic paper consultation period onwards, including summary comments and Dundee City Council's responses. Comments are only provided where contributions from stakeholders led to amendments or additions to the evidence base.

Where formal disputes could not be resolved through further engagement they are identified in the table and then further detail is provided within the 'Statements of Agreement / Dispute' section.

Stakeholder	Summary Comments and DCC Response
NHS Tayside - Deputy Chief Executive - Sandra Macleod (STA054)	In agreement with the evidence. DCC Response: Comments noted.
NHS Tayside - Director of Facilities & Estates - Gary Mortimer (STA055)	In agreement with the evidence. DCC Response: Comments noted.
NHS Tayside - Director of Public Health - Dr Emma Fletcher (STA012)	In agreement with the evidence. DCC Response: Comments noted.
NHS Tayside - Dietetic Consultant in Public Health - Dr William Cook (STA051)	In agreement with the evidence. Recommended making specific reference to out of home food outlets and food business operators/retail within the implications for development of the LDP. DCC Response: Comments incorporated into Schedule 3.
Historic Environment Scotland (STA004)	In agreement with the evidence. DCC Response: Comments noted.
Network Rail (STA019)	In agreement with the evidence. DCC Response: Comments noted.
Grow Green Scotland (STA034)	In agreement with the evidence. Identification of relevant policy to be included within the review of the current Dundee LDP 2019. Identification of important statistics on the existing and potential land capacity for food growing set out in the Local Food Growing Strategy Dundee. Recommendation that a broader variety of community growing spaces should be taken into consideration during proposed plan stage, e.g. community gardens, community market gardens, orchards, roof gardens, and school gardens. DCC Response: Comments incorporated into Schedule 3.
Homes for Scotland (STA047)	Dispute the evidence. Please see the 'Statements of Agreement/ Dispute' section below for further information.

Summary of Implications for the Proposed Plan

- 5.92 The evidence presented demonstrates that Dundee is facing significant health challenges now and projected into the future, particularly regarding our ageing population, deprivation, life expectancy disparity, various health conditions, drug deaths, social isolation, and infrastructure and service delivery. As previously outlined in paragraph 5.1 of the Summary of Evidence, there are many direct and indirect health links associated with the implementation of various NPF4 policies, therefore, improving people's health throughout the city will require a multi-policy approach within the next LDP, and requirements such as the Open Space Strategy and Play Space Sufficiency Assessments will have a role to play.
- 5.93 Delivering on the Town Centre First principle is vital to producing a more vibrant, dense, resilient, and influential city centre within Dundee, which can contribute towards improving various health outcomes. This includes the benefits associated with walkable cities, better integration of people and community, and by tackling the isolation and loneliness associated with older people, particularly where housing types for the elderly are introduced and associated with complimentary, mixed-use, developments. Policy 21 of Dundee's current LDP 2019 ([DED088](#)) established the town centre first approach, and policy 27 of the NPF4 ([DED201](#)) strengthens the requirement further. Dundee's proposed plan, spatial strategy and masterplanning should further strengthen and adhere to the town centre first approach to help create a healthier city. The recently published Dundee City Centre Strategic Investment Plan 2050 (CCSIP) ([DED067](#)) sets out how we aim to develop a more successful city centre and it is a material consideration in the determination of planning applications. The CCSIP will be integrated within the development of the proposed plan.
- 5.94 Self-Care is a strategic priority for the health service, which enables people to look after themselves independently from services, have more control of their health, and to improve their quality of life. Health professionals recognise that to support self-care we need to have *“more people, especially disadvantaged groups, accessing a wider range of health, wellbeing and healthy lifestyle activities across the city”*. Planning and the City Council as a whole can support this through development and infrastructure which facilitates self-care, particularly physical activity, access to green/blue spaces, exposure to nature, and creating environments which increase physical activity, social interaction, and community participation. This can be achieved through public realm improvements, such as the introduction of new active travel routes, new and enhanced green/growing spaces, improving access to leisure, sports, services, and nature, and locating new housing close to existing infrastructure (developing brown-field sites), which makes schools, services and leisure facilities more accessible, i.e. liveable neighbourhoods (20-minute neighbourhoods). The Proposed Plan's policy, spatial strategy and masterplanning will integrate the above spatial contributions to self-care.
- 5.95 In preparation for the next LDP, the Planning team is currently developing a GIS Liveable Neighbourhoods Tool (para. 7.29 to 7.35). The intention is to make this a public asset with a broad range of mapped services and amenities. This should be of use to the Planning team and healthcare officials for asset management planning, and it should help to better understand the nature of Dundee's food environment through the mapping of multiple food sources.

Specific Considerations:

- 5.96 **Health and Social Care Infrastructure Provision:** We will continue to work with NHS Tayside and the DHSCP to develop a spatial strategy that considers the upgrading, diversification, and provision of new health and social care services and infrastructure, which aligns with budgetary constraints, area specific requirements, and the multiple policy links highlighted in paragraph 5.1, particularly NPF4 Policy 15 Local Living and 20 Minute Neighbourhoods. Being part of the 'NHS Tayside Infrastructure Group' will allow the Planning team to consider and support the development of NHS Tayside's Whole System Infrastructure Plan (WSIP) during the call for ideas and proposed plan stages. The second planning phase of the WSIP 'Preferred Way Forward Option' focuses on the longer-term service-informed infrastructure investment strategy for the next 20-30 years. This phase is due to commence during 2026 and will provide important information for consideration during the call for ideas and proposed plan stages.

- 5.97 **Food Growing Space:** Further allotment space considered to meet public demand, and consideration of policy support for growing spaces in new development, as suggested in Dundee's Local Food Growing Strategy. The broader variety of community growing spaces will be taken into consideration during the proposed plan stage, e.g. community gardens, community market gardens, orchards, roof gardens, and school gardens etc. The suitability of food growing spaces would have to consider the possibility of land contamination.
- 5.98 **Food Outlets:** The evidence on the implications of food outlets in Dundee will be considered in relation to the proposed plan and potential policy. This will be considered in conjunction with the evidence base from the Town Centre First and Economy topic paper, which includes NPF4's 'Policy 27 City, town, local and commercial centres', part (c) and (d), which seek to control the development of non-retail uses and drive-thrus.
- 5.99 **Health Impact Assessment (HIA):** Consider carrying out HIAs on all policies within the proposed plan. A policy requirement for HIAs on all national and major planning applications will also be considered.
- 5.100 **Developer Contributions:** Consideration of the potential for developer contributions to support health infrastructure, particularly associated with any new peripheral housing developments.
- 5.101 **Agent of Change Principle:** NPF4 only refers to noise in relation to the agent of change principle. Consideration should be given to the inclusion of air quality, odour and light nuisance in relation to agent of change.
- 5.102 **Noise Impact Assessment:** Consideration for introducing the automatic requirement for Noise Impact Assessment for proposed development in relation to designated Noise Management Areas and Quiet Areas.
- 5.103 **Housing Standards:** Consider more focused and defined requirements for amenity space associated with residential developments. An agreed approach to the required sound levels for external amenity areas should be considered.

Statements of Agreement / Dispute

Statements of Agreement

5.104 As outlined within the Summary of Stakeholder Engagement, a significant level of engagement was carried out with multiple stakeholders during pre-consultation, consultation, and post-consultation of the topic paper. The following organisations agree with the evidence base presented:

- NHS Tayside (STA054) (STA055) (STA051)
- Dundee Health and Social Care Partnership
- Public Health Scotland
- Grow Green Scotland (STA034)
- Network Rail (STA019)
- Historic Environment Scotland (STA004)

Statements of Dispute

5.105 Throughout the course of the consultation on the Health and Safety topic paper one formal dispute was submitted by Homes for Scotland. We carefully considered all issues raised and submitted comments back to Homes for Scotland to clarify our position. Notwithstanding our response, Homes for Scotland have chosen to take their dispute to Gate Check. The nature of their dispute and our final position is set out below.

Homes for Scotland

5.106 Homes for Scotland's dispute applies to three aspects of the evidence base:

1. Evidence/Dataset Sufficiency
2. Evidence/Dataset Summation
3. Agreement on Proposed Plan Implications

Each aspect is addressed individually as follows:

1. Evidence/Dataset Sufficiency

Dispute

5.107 It would be useful if the Council considered the findings of the Scottish House Condition Survey. The delivery of new homes is key to delivering better health outcomes. Aligned with this, the Council must consider the findings of the Existing Housing Need in Dundee City report, which underlines the true scale of housing need in Dundee.

DCC Response

5.108 In alignment with NPF4, paragraph 5.1 of the Summary of Evidence highlights that health and wellbeing is a cross-cutting outcome with multiple policy links. The full list of NPF4's 20 cross-cutting policy links is listed, including Policy 16 Quality Homes. The health implications of providing good quality homes are clearly stated within the policy outcomes of Policy 16 and therefore there is no need for this to be reiterated within policy 23 Health and Safety, particularly as the scope of policy 23 intentionally focusses on other specific health and safety related matters.

2. Evidence/Dataset Summation

Dispute

5.109 The Topic Paper notes that an ageing population is arising. This will create new challenges, including the need to consider all-tenure delivery mechanisms and how best to allow for the increased number of single-person households that are likely to be formed.

DCC Response

5.110 There are multiple implications associated with an ageing population, including housing challenges, however this specific issue is covered by policy 16 Quality Homes. The specific health and safety matters covered by Policy 23 Health and Safety are not intended to tackle housing related challenges.

3. Agreement on Proposed Plan Implications

Dispute

5.111 This dispute is separated into four parts:

- a) There is a general lack of information with regards to the expected costs of providing the identified required upgrades to the existing medical infrastructure, or for providing any new facilities.
- b) HFS disagrees with the principle of charging the homebuilding industry for the provision of healthcare facilities. The NHS as an organisation is funded through central government funding and most surgeries act as businesses, and therefore the burden should not be placed upon the development industry to cover any funding shortfall.
- c) The topic paper does not provide evidence to justify the requirement for new or extended medical practices, nor the requirement for developer contributions to enable these. It is also unclear why “peripheral housing developments” have been singled out.
- d) There is reference to Dundee’s falling population. The delivery of new homes would stem this population decline, however, there is no information within the draft Topic Paper with regards to measures which may be put in place to stem this decline.

DCC Response

5.112 The evidence base is established through information published by NHS Tayside and the Dundee Health and Social Care Partnership (DHSCP), which does not include any information on the financial implications of upgrading existing medical infrastructure or the building of potential new facilities in Dundee. Consequently, the evidence report does not include any financial data.

5.113 Regarding developer contributions, it is worth noting that contributions towards health infrastructure is already a potential option within the current LDP2019 Supplementary Guidance Developer Contributions ([DED053](#)). With reference to section ‘3. Qualifying Developments’ (page 6):

5.114 “Developer contributions are most likely to be sought for: education provision; road junction improvements and other off-site road works; public transport provision; healthcare facilities; waste facilities; open space improvements, green infrastructure and public art.”

5.115 Considering NPF4’s place based and infrastructure first approach, further consideration of the potential for health infrastructure contributions in specific situations merits investigation. Peripheral housing developments have been identified for consideration due to the inherent lack of services associated with peripheral development, such as the need for school provision in these areas. We acknowledge the comments submitted on this subject, including specific reference to ‘Circular 3/2012 Planning Obligations and Good Neighbour Agreements’ and the Aberdeenshire appeal case (POA-110-2015), which will be further considered during the Call for Ideas and Proposed Plan stages.

5.116 Regarding the justification for the requirement for new or extended medical practices, this is based on the proposed plans and strategies put forward by NHS Tayside and the DHSCP, which are informed in part by current LDP allocated development opportunities and any future allocations which emerge from the adoption of the next LDP. It is worth noting that since consulting on the health and safety topic paper, NHS Tayside have informed that, alongside all of Scotland’s NHS Boards, they are working on a Whole System Infrastructure Planning approach, as instructed by NHS Scotland. This is a two-phase process, starting with a phase 1 ‘Business Continuity Plan’, followed by a phase 2 ‘Preferred Way Forward Option’, which will develop a long-term service-informed infrastructure investment strategy for the next 20-30 years. The information gathered to date will be used to inform the evidence report and will be taken forward to gate check, any further information which emerges, such as the Whole System Infrastructure plans, will be taken into consideration when it becomes available. We are committed to

continue working with NHS Tayside and the DHSCP to develop their infrastructure planning requirements. To streamline this collaborative process, the 'NHS Tayside Infrastructure Group' was established in December 2024 with senior representatives from NHS Tayside, Health and Social Care Partnership (HSCP) representatives, and Planning officers from Dundee, Angus, and Perth & Kinross Councils. We will continue to meet every two months to engage on the development of the next LDP.

5.117 Reference to Dundee's population decline is primarily associated with data on the long-term projections associated with falling birth rates, which is a societal issue. The topic paper's evidence base is intended to highlight this for consideration and is not intended to put forward measures to address this challenge.

Design, Quality and Place (006)

Issue: Topic / Place	Design, Quality and Place (DER006)
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended: Section 15(5) • The principal built heritage characteristics of the district. • the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district.
Links to Evidence	Policy 7 – Historic Assets and Places • National Planning Framework 4 DED201 • Dundee Local Development Plan 2019 DED088 • Historic Environment Policy for Scotland DED155 • Managing Change in the Historic Environment Guidance Notes DED187 • Historic Environment Scotland Circular: Regulations and Procedures DED156 • Talking About Heritage DED281 • Our Past, Our Future DED220 • Pointing the Way to the Future DED232 • Green Recovery Statement for The Historic Environment DED136 • A Guide To Climate Change Impacts DED140 • Your Historic Place - Pilot Version: A lens for the Place Standard Tool DED309 • Climate Change Risk Assessment DED031 • Scotland's Historic Land Use (HLA Map) DED261 • National Record of the Historic Environment (Trove) DED202 • Exploring Scotland's Historic Environment (Pastmap) DED118 • Historic Environment Scotland's Portal DED157 • Historic Environment Scotland: LDP Evidence Response to Dundee City Council DED154 • Buildings at Risk Register DED024 • Conservation Areas and Appraisals DED041 Policy 14 – Design, Quality and Place • National Planning Framework 4 DED201 • Dundee Local Development Plan 2019 DED088 • Place Principle DED226 • Place Standard Tool DED228 • Dundee Place Standard Survey (DED229) • Dundee Place Standard Results 2024 (DED227) • Dundee Place Reports (DED251)

	• Six Qualities of Successful Places (NPF4 Annex D) DED286 • Local Community Plans 2022 - 2027 DED178 • Dundee City Centre Strategic Investment Plan 2050 DED067 • UNESCO City of Design DED299 • Conservation Areas and Appraisals DED041 • Key Agency Group – Corporate Workshop Report DED170 • Key Agency Group – Maryfield Area Level Workshop Report DED171 • Creating Places: A policy statement on architecture and place for Scotland DED044 Policy 25 – Community Wealth Building • National Planning Framework 4 DED201 • Dundee Local Development Plan 2019 DED088 • Planning circular 1/2022: Local Place Plans DED231 • PAS Guide for community delivery of Local Place Plans 2023 DED139 • How to guide in creating Local Place Plans 2021 DED161 • Stobswell Local Place Plan 2025 DED383 • Scotland's National Strategy for Economic Transformation 2022 DED263 • Improvement Service: Elected Member Briefing Note – Community Wealth Building 2020 DED110 • A New Future for Scotland's Town Centres (2021) DED008 • Places, Land and Community Wealth Building in Scotland: An Overview (2022) DED230 • Building Community Wealth: consultation paper (2023) DED023 • City Governance Committee: Community Wealth Building in Dundee - Progress Update (June 2024) DED132 • Policy and Resources Committee - Community Wealth Building In Dundee (Report No. 312-2021) DED038 • DCC Community Asset Transfer DED036 • Policy and Resources Committee - Annual Procurement Report and Community Benefits Update DED018 • Dundee Community Wealth Building Strategy and Action Plan (2025-2030) DED314 • Scottish Index of Multiple Deprivation DED330 • Sustainable Dundee Map DED277
Summary of Evidence	
<u>NPF4 Policy 7 – Historic Assets and Places</u> Policy Context National Planning Framework 4 DED201	

- 6.1 NPF4 recognises that historic assets and places make a significant contribution to sustainable and productive places. Maintaining the historic built environment also supports sustainability and net zero targets by continuing to lock in the embodied carbon. It is therefore important to protect and enhance our historic environment and safeguard our shared heritage for future generations.
- 6.2 Policy 7 intends to protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places.
- 6.3 Successful outcomes through policy delivery would result in the historic environment being valued, protected, and enhanced, supporting the transition to net zero and ensuring assets are resilient to current and future impacts of climate change. Redundant or neglected historic buildings are brought back into sustainable and productive uses. The social, environmental and economic value of the historic environment, to our economy and cultural identity, is recognised.
- 6.4 The policy sets out the following specific requirements of Local Development Plans:
- LDPs, including through their spatial strategies, should support the sustainable management of the historic environment. They should identify, protect and enhance valued historic assets and places.
- 6.5 Implications for planning's Development Management are that development proposals with a potentially significant impact on historic assets or places must be accompanied by an assessment. The assessment should identify the likely visual or physical impact of any proposals for change, including cumulative effects and provide a sound basis for managing the impacts of change. Proposals should be informed by national policy and guidance on managing change in the historic environment, and information held within Historic Environment Records.
- 6.6 Development proposals for the demolition of listed buildings will not be supported unless it has been demonstrated that there are exceptional circumstances and that all reasonable efforts have been made to retain, reuse and/or adapt the listed building.
- 6.7 Development proposals for the reuse, alteration or extension of a listed building will only be supported where they will preserve its character, special architectural or historic interest and setting. Development proposals affecting the setting of a listed building should preserve its character, and its special architectural or historic interest.
- 6.8 Development proposals in or affecting conservation areas will only be supported where the character and appearance of the conservation area and its setting is preserved or enhanced. Development proposals in conservation areas will ensure that existing natural and built features which contribute to the character of the conservation area and its setting, including structures, boundary walls, railings, trees and hedges, are retained.
- 6.9 Demolition of buildings in a conservation area which make a positive contribution to its character will only be supported where it can be demonstrated that specific criteria can be met. Where demolition within a conservation area is to be followed by redevelopment, consent to demolish will only be supported where an acceptable design, layout and materials are proposed.
- 6.10 Development proposals affecting scheduled monuments, and nationally important Gardens and Designed Landscapes, will only be supported where it can be demonstrated that specific criteria can be met.
- 6.11 Development proposals which sensitively repair, enhance and bring historic buildings, as identified as being at risk locally or on the national Buildings at Risk Register, back into beneficial use will be supported.

- 6.12 Enabling development for historic environment assets or places that would otherwise be unacceptable in planning terms, will only be supported when it has been demonstrated that the enabling development is essential to secure the future of an historic environment asset or place, which is at risk of serious deterioration or loss; and that the enabling development is the minimum necessary to secure the restoration, adaptation and long-term future of the historic environment asset or place. The beneficial outcomes for the historic environment asset or place should be secured early in the phasing of the development and will be ensured through the use of conditions and/or legal agreements.
- 6.13 Non-designated historic environment assets, places and their setting should be protected and preserved in situ wherever feasible. Where there is potential for non-designated buried archaeological remains to exist below a site, developers will provide an evaluation of the archaeological resource at an early stage so that planning authorities can assess impacts. Historic buildings may also have archaeological significance which is not understood and may require assessment.
- 6.14 Where impacts cannot be avoided, they should be minimised. Where it has been demonstrated that avoidance or retention is not possible, excavation, recording, analysis, archiving, publication and activities to provide public benefit may be required through the use of conditions or legal/planning obligations. When new archaeological discoveries are made during the course of development works, they must be reported to the planning authority to enable agreement on appropriate inspection, recording and mitigation measures.

Dundee Local Development Plan 2019 [DED088](#)

- 6.15 Dundee City Council's current [Local Development Plan 2019](#) (LDP 2019) includes several policies which control and support development which involves the city's historic assets and places. The policies have been identified below, including a note on their relevance.

LDP 2019 Policy	Relevance to NPF4 Policy 7
Policy 49: Listed Buildings	Control of development proposals for alternative uses, and alterations to listed buildings, and development which affects the setting of a listed building.
Policy 50: Demolition of Listed Buildings and Buildings in Conservation Areas	Specific criteria controlling proposals to demolish listed buildings and buildings in conservation areas.
Policy 51: Development in Conservation Areas	Control of development within conservation areas, whereby proposals are expected to preserve or enhance the character of the surrounding area.
Policy 52: Scheduled Monuments and Archaeological Sites	Control of development proposals which could affect a scheduled monument, or sites of known/potential archaeological importance.
Policy 53: Gardens and Designed Landscapes	Control of development proposals affecting gardens and designed landscapes.

Figure 6.1: Local Development Plan 2019 policy links to NPF4 Policy 7.

Evidence Review

Our Past, Our Future [DED220](#)

6.16 This national strategy highlights the extensive value of Scotland's historic environment and identifies the priority areas of action to support the mission to *'sustain and enhance the benefits of Scotland's historic environment, for people and communities now and into the future'*. The mission is supported by 3 priorities and 6 principles, as shown in the following diagram.



Figure 6.2: Strategy's mission, priorities, and outcomes.

6.17 The historic environment is vital to Scotland's people and communities as it connects people with place, and with the history, traditions, stories, and memories associated with places and landscapes. The historic environment is part of our everyday lives, and it provides character to our landscapes, strengthens and enhances our local communities, and helps to forge a sense of place. Traditional buildings make up a significant proportion of Scotland's building stock.



Figure 6.3: Key statistics extract - Estimated percentage of traditional buildings in the built environment.

6.18 Traditional buildings also play a significant role in attracting tourists to Scotland, which has a significant economic impact.



Figure 6.4: Key statistics extract – Heritage contribution to the economy via tourism.

Historic Environment Policy for Scotland [DED155](#)

6.19 This policy statement outlines how we should undertake our collective duty of care for Scotland's historic environment and supports good decision making for our unique historic assets and places. The following diagram helps visualise the policy's relationship with other HES policy and guidance, and national and local government policy, strategies and plans. The 'statutory development plans' include National Planning Framework 4 and Local Development Plans.



Figure 6.5: Policy relationship between HES and national and local government policy

6.20 There are six policies within the document which define how the historic environment should be managed:

1. Decisions affecting any part of the historic environment should be informed by an inclusive understanding of its breadth and cultural significance.
2. Decisions affecting the historic environment should ensure that its understanding and enjoyment as well as its benefits are secured for present and future generations.
3. Plans, programmes, policies and strategies, and the allocation of resources, should be approached in a way that protects and promotes the historic environment. If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.
4. Changes to specific assets and their context should be managed in a way that protects the historic environment. Opportunities for enhancement should be identified where appropriate. If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored, and mitigation measures should be put in place.
5. Decisions affecting the historic environment should contribute to the sustainable development of communities and places.
6. Decisions affecting the historic environment should be informed by an inclusive understanding of the potential consequences for people and communities. Decision-making processes should be collaborative, open, transparent and easy to understand.

Managing Change in the Historic Environment [DED187](#)

6.21 One of Historic Environment Scotland's key roles is to provide best practice guidance on change in the historic environment, and managing change is a key aspect of the Historic Environment Policy for Scotland, which directly applies to the policies 2, 3, and 4, as set out above. Therefore, the Managing Change in the

Historic Environment provides a series of guidance notes about making changes to the historic environment. Each managing change guidance note looks at a different theme in terms of the key issues that might arise, how best to deal with such issues, and the reasons behind the advice.

Historic Environment Scotland Circular: Regulations and Procedures [DED156](#)

6.22 This document sets out the processes that HES must undertake to fulfil their regulatory and advisory roles in relation to:

- The designation of monuments of national importance and buildings of special architectural or historic interest.
- Their role in the planning system and the procedures for consultation.
- Scheduled Monument Consent (SMC) applications and decisions.
- Listed Building Consent (LBC) and Conservation Area Consent (CAC) applications.
- Appealing decisions made by Historic Environment Scotland.

Talking About Heritage [DED281](#)

6.23 A very helpful and in-depth guide to:

- Investigating heritage
- Understanding what's special about heritage
- Sharing and celebrating heritage
- Protecting and caring for heritage

Pointing the Way to the Future [DED232](#)

6.24 This document sets out HES's position on the climate and nature crisis, which recognises the role that the historic environment plays in climate change mitigation and in the just transition to net zero. Decisions about the historic environment are part of the response to these crises, and the reuse of historic assets is central to sustainable development.

Green Recovery Statement for The Historic Environment [DED136](#)

6.25 This statement supports the green principles set out by the Scottish Government and highlights seven key areas where the historic environment can help deliver economic recovery and contribute to the national transition to a low carbon, resource efficient and socially inclusive economy.

1. **RESOURCE EFFICIENT:** The reuse and adaptation of existing heritage assets is integral to a net zero transition.
2. **SUPPORTING NET ZERO:** Well maintained and retrofitted traditional buildings are more resilient and emit less carbon helping deliver net zero targets.
3. **GOOD, GREEN JOBS:** The repair, maintenance and retrofit of existing heritage assets delivers good, green jobs nation-wide.
4. **LOCALISM:** Community empowerment drives benefits by putting more control of the historic environment into local hands.
5. **RESPONSIBLE TOURISM:** Heritage assets can make better places for people to live in and better places for people to visit.

6. **LAND MANAGEMENT:** The historic environment helps build resilient landscapes and climate friendly places.
7. **DIGITAL CONNECTIVITY:** The use of digital technologies helps protect historic places and offers new and sustainable ways to engage with our historic environment.

A Guide To Climate Change Impacts [DED140](#)

- 6.26 This guide sets out many of the risks and hazards of climate change that are facing Scotland's historic environment and offers owners, local communities and carers of historic sites routes to take action, to implement adaptation measures and enhance resilience. The guide provides a tool for assessing the different hazards and levels of risk that threaten different types of sites in Scotland's historic environment.

Climate Change Risk Assessment [DED031](#)

- 6.27 This report represents a comprehensive and ongoing exercise to understand, monitor and manage environmental risk to historic sites within the care of HES. In Dundee, this relates to Broughty Castle and Claypotts Castle. An assessment of the risks for each of these sites is provided in the Register section of the report. Due to its coastal location, Broughty Castle is at increased risk from coastal erosion and the harsh weather conditions.

HES Communities [DED384](#)

- 6.28 Information on Historic Environment Scotland's work with communities and the resources, advice and support they offer can be found at [HES Communities](#), including efforts to empower communities and support them in championing their local heritage. HES supports inclusive access to their Properties in Care in Dundee (Broughty Castle and Claypotts Castle) through provision of Free Education Visits and Heritage Travel Subsidy for schools.

Exploring Scotland's Historic Environment (Pastmap) [DED118](#)

- 6.29 Pastmap provides a helpful map-based search tool for all of HES's designations and records, including:
- Listed Buildings
 - Scheduled Monuments
 - Garden & Designed Landscapes
 - Conservation Areas
 - Canmore
 - Canmore Maritime
 - Historic Environment Record
 - Battlefields
 - World Heritage Sites
 - Historic Marine Protected Areas
 - Protected Military Remains, Wrecks

National Record of the Historic Environment (Trove) [DED202](#)

- 6.30 Trove.scot is a new platform which brings together HES's wealth of unique and diverse collections in one convenient place. It combines information from the Historic Environment Portal, Canmore, SCRAN, and

Property in Care Collections. This resource is compiled and managed by Historic Environment Scotland and contains information and collections from all its survey and recording work. The data includes 1.2 million images from our archives, 335,000 records of Scotland's places, 55,200 designated sites, and 2,000 culturally significant objects, covering archaeological sites, buildings, industry and maritime heritage across Scotland.

Scotland's Historic Land Use (HLA Map) [DED261](#)

6.31 This mapping project shows the extent of changes that have occurred to the environment, from 20th century forestry plantations to medieval field systems, highlighting important landscapes and informing the public of their locations. It uses simple annotated maps to show how the landscape has changed over time, giving the user a tool to decipher the broad elements of the historic environment.

Your Historic Place - Pilot Version: A lens for the Place Standard Tool [DED309](#)

6.32 Your Historic Place is designed to be used with the [Place Standard Tool](#). It can help to spark and support conversations which explore the connections between people, place, and our historic environment with all of the Place Standard Tool's 14 themes. The lens has been developed by Historic Environment Scotland and supported by the Place Standard Implementation Group.

6.33 A GIS version of the Place Standard Tool has been used to conduct a place survey for the city. An overview and key outcomes from the Dundee Place Standard Survey ([DED229](#)) is evidenced under policy 14 Design, Quality and Place (para. 6.56 to 6.67).

Historic Environment Scotland: LDP Evidence Response to Dundee City Council (DED154)

Asset Overview

6.34 As of 26/04/2024, there are 899 designated historic sites and places in the Dundee City Council area. This consists of 885 Listed Buildings, 11 Scheduled Monuments, and 3 Gardens and Designed Landscapes. Many of these assets are located within the city's 17 Conservation Areas. Further information on HES's various designations is provided in this [link](#).

Listed Buildings

6.35 The Dundee City Council area contains 885 listed buildings. Of which, there are 78 category A, 555 category B, and 252 category C listed buildings. The location and further information on these designations can be found on Historic Environment Scotland's Portal ([DED157](#)).

6.36 It is almost 30 years since Dundee's built environment was last resurveyed for listed buildings. The understanding and appreciation of buildings of all types and period continues to evolve and younger buildings are eligible for listing. There is no listing work planned for the Dundee area, however, HES are open to proposals from individuals, groups and organisations. This [webpage](#) provides helpful information on HES's approach to listing.

6.37 The Church of Scotland are currently undergoing an estate review that will likely lead to a number of buildings being disposed of. There are currently 11 places of worship being considered for disposal within Dundee by 2027, seven of these buildings are listed and some may have already closed. Dundee City

Council are encouraged to enter into dialogue with the presbytery and encouraged to take a proactive approach to considering the long-term options for such buildings falling out of use and look to the challenges and opportunities that these sites may offer in terms of the communities in which they are situated and the services that they require.

Scheduled Monuments

6.38 There are 11 scheduled monuments in the Dundee City Council area. The location and further information on these designations can be found on Historic Environment Scotland's Portal ([DED157](#)).

Inventory Gardens and Designed Landscapes

6.39 There are 3 Inventory sites designated in the Dundee City Council area. The location and further information on these designations can be found on Historic Environment Scotland's Portal ([DED157](#)).

6.40 HES are currently undertaking a project called 'Designed Landscapes of the Recent Past'. The objective is to identify, recognise and celebrate Scotland's modern garden and designed landscape heritage, focusing on sites dating from 1945 to the early 2000s. A public online survey returned one nomination for a site in Dundee: Olivetti, Dundee. HES's own internal scoping identified the garden of the Maggie's Centre at Ninewells Hospital of interest for inclusion in the programme. However, HES have no recording or designation work currently planned.

Buildings at Risk Register [DED024](#)

6.41 The online [Buildings at Risk Register](#) is a national database providing information on heritage buildings which are at risk due to their need for repair, re-use, and/or re-purposing. There are currently 33 at-risk buildings in Dundee, and a further 6 buildings on the list which are classified as 'restoration in progress'. The key points are as follows:

- A third (11) represent the city's industrial heritage, most (6) relating to textile production. A quarter (9) are classified as residential buildings. These are empty homes ranging in size from cottages to middle size houses and country houses. The remainder of the Register include buildings such as theatres, churches, cemeteries and offices.
- Across BARR the percentage of buildings in areas of comparatively more deprivation (SIMD Deciles 1-3) is around 17%. In Dundee it is 29% (10) including buildings such as the Camperdown Warehouses, Eagle Mill and King's Theatre.
- Around 80% of buildings are now long-term at-risk and have featured on the register for 10 years or more.
- 6 buildings are being regenerated, and their status has changed to Restoration in Progress.
- Since 1990, 68 buildings have been saved and 24 demolished in Dundee.
- The top three saved building types are Residential (22) followed by Industrial (18) and Commercial (9). The three most demolished are Commercial (9) followed by Industrial (4) and Residential (4).
- 50% of those demolished but only 28% of those saved, were in areas now assessed as comparatively more deprived (SIMD Deciles 1-3).

6.42 The status of the Buildings At-Risk Register is subject to change, therefore updates and corrections are welcome. Evidence gathered within the Vacant and Derelict Land Register, and the Empty Homes service,

could help identify unregistered historic assets. The Church of Scotland's extensive estate review may result in more churches becoming redundant in Dundee.

Historic Environment Scotland Grants

6.43 Since 2019 HES have received approximately 31 Expressions of Interest from projects within Dundee. These have included repair projects to churches, a library, private homes, a gymnasium, gravestones, an observatory, a tram depot, a graving dock, a mosque, as well as a public artwork and community outreach programme, a thatching project, and funding towards the [Dundee Historic Environment Trust](#), which provides grant assistance towards repair of historic buildings and townscape features in Dundee.

6.44 Between 2014 and 2023, HES have provided funding totalling £2,666,045 in Dundee, with £2,647,000 being awarded to the Dundee Historic Environment Trust. There is currently 1 live project being funded, totalling £750,000, and another project going through assessment.

Conservation Areas and Appraisals [DED041](#)

6.45 Conservation Area status is granted to specific historic areas of the city to protect their special character and to ensure their future management. Conservation Areas are areas of special architectural and/or historic interest, the character or appearance of which it is desirable to preserve or enhance. During April 2025 Dundee's seventeen conservation area appraisals were reviewed and updated. The map location of Dundee's conservation areas can be found on [Historic Environment Scotland's Portal](#).

Policy 14 – Design, Quality and Place

Policy Context

National Planning Framework 4 [DED201](#)

6.46 NPF4 recognises that design, quality and place have a fundamental role to play in the delivery of NPF4 and LDPs. Design, quality and place are cross cutting themes with a legacy of research and publications promoted and/or produced by the Scottish Government, which is integrated into NPF4, including the [Creating Places Policy Statement](#), [Place Principle](#), [Place Standard Tool](#), and the [Six Qualities of Successful Places](#).

6.47 Policy 14 intends to encourage, promote and facilitate well designed development that makes successful places by taking a design-led approach and applying the Place Principle.

6.48 Successful outcomes through policy delivery would result in quality places, spaces and environments, and places that consistently deliver healthy, pleasant, distinctive, connected, sustainable and adaptable qualities.

6.49 The policy sets out the following specific requirements of Local Development Plans:

- LDPs should be place-based and created in line with the Place Principle. The spatial strategy should be underpinned by the six qualities of successful places. LDPs should provide clear expectations for design, quality and place taking account of the local context, characteristics and connectivity of the area. They should also identify where more detailed design guidance is expected, for example, by way of design frameworks, briefs, masterplans and design codes.

- Planning authorities should use the Place Standard Tool in the preparation of LDPs and design guidance to engage with communities and other stakeholders. They should also where relevant promote its use in early design discussions on planning applications.

6.50 Implications for planning's Development Management are that development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale. Development proposals will be supported where they are consistent with the six qualities of successful places:

1. Healthy
2. Pleasant
3. Connected
4. Distinctive
5. Sustainable
6. Adaptable

6.51 Development proposals that are poorly designed, detrimental to the amenity of the surrounding area or inconsistent with the six qualities of successful places, will not be supported.

Dundee Local Development Plan 2019 [DED088](#)

6.52 Dundee City Council's current Local Development Plan 2019 (LDP 2019) includes several policies and supplementary guidance which encourages a design-led approach to all development and provides specific guidance on particular types of development. The policies have been identified below, including a note on their relevance.

LDP 2019 Policy	Relevance to NPF4 Policy 14
Policy 1: High Quality Design and Placemaking Appendix 1: High Quality Design and Placemaking	Overarching policy which requires a design-led approach to sustainable, high-quality, placemaking, with reference to an expanded version of the six qualities of successful place. Policy preamble positively encourages use of the Place Standard Tool.
Policy 2: Public Art Contribution	Enriching the quality of developments, open spaces and cultural heritage by adding to the visual interest and quality of the City's environment.
Policy 10: Design of New Housing	Requirement for a design-led, high-quality, housing which contributes to creating places that respect and enhance the distinct character and identity of the different parts of the City. All new housing developments should meet the six qualities of successful place, as set out in Policy 1/Appendix 1.
Policy 11: Householder Development	Protection of the character and quality of the existing house and surrounding area by virtue of size, design and materials.
Policy 12: Formation of New Residential Accommodation	Requirement to comply with Policy 10 Design of New Housing, and specific design requirements.

Policy 13: Development of Garden Ground for New Housing	Requirement to comply with Policy 10 Design of New Housing, and specific design requirements.
Policy 14: Residential Accommodation for Particular Needs	Specific design considerations for high-quality residential accommodation.
Policy 15: Student Accommodation	Requirement for high-quality design and layout.
Policy 19: Private Day Nurseries	Specific design considerations for high-quality nurseries.
Supplementary Guidance Householder Development - Advice and Best Practice	Practical design guidance for householder development.

Figure 6.6: Local Development Plan 2019 policy links to NPF4 Policy 14.

Evidence Review

Place Principle [DED226](#)

- 6.53 Place is where people, location and resources combine to create a sense of identity and purpose and is at the heart of addressing the needs and realising the full potential of communities. Places are shaped by the way resources, services and assets are directed and used by the people who live in and invest in them.
- 6.54 The Place Principle promotes a shared understanding of place, and the need to take a more collaborative approach to a place's services and assets to achieve better outcomes for people and communities. The principle encourages and enables local flexibility to respond to issues and circumstances in different places. It requires all those responsible for providing services and looking after assets in a place to work and plan together, with local communities, to improve the lives of people, support inclusive and sustainable economic growth, and create more successful places.

Place Standard Tool ([DED228](#))

- 6.55 The Place Standard Tool provides a helpful way for communities to assess and discuss the quality of their local area. Through a simple framework the tool structures conversations about place and allows people to think about the physical elements, (such as buildings, spaces, and transport links), and the social aspects (like participation and having a say in decision making). The following section outlines how the City Council's Planning team created an online version of the Place Standard Tool for a Dundee wide survey.

Dundee Place Standard Survey ([DED229](#))

- 6.56 To produce a comprehensive and more place-based survey for this evidence report, the Planning Team created an online GIS version of the Place Standard Tool to allow local residents, community groups, businesses, and other stakeholders to evaluate and better understand the quality of their neighbourhood. It also helps the Planning Team better understand the quality of Dundee's neighbourhoods and contributes to the LDP evidence base. The survey was open from April to August 2024 and received a total of 216 responses. Further detail on the survey engagement is set out in the Summary of Stakeholder Engagement section.
- 6.57 Responses from the survey have been assessed and summarised into the key qualitative and quantitative outcomes. The quantitative outcomes are presented through an online GIS Dashboard (Dundee Place Standard Results 2024) ([DED227](#)), and the qualitative outcomes are presented within GIS StoryMaps for all eight Wards within the city (Dundee Place Reports) ([DED251](#)). Further information on the place reports is set out in the following section.

Dundee Place Reports ([DED251](#))

6.58 Using GIS StoryMaps, place reports have been created to pull together all of the place-based data and surveys for each of Dundee's eight Wards. Each report contains a map of the Ward's location, key demographic and household statistics, detailed and interactive area characteristic maps, and the key qualitative outcomes from the Dundee Place Standard Survey, as outlined in the above section.

6.59 Assessment of the survey responses was conducted by identifying the key strengths, drivers for change, opportunities, and challenges (SDOC methodology). Each place report includes a comprehensive overview of the SDOC outputs. A high-level summary of the SDOC outputs is outlined below:

6.60 Coldside

Key Strengths: Natural assets with a number of parks offering good facilities and scenic views. The ward's central location ensures accessibility to amenities, with strong connectivity. Safety is generally perceived positively during daylight hours, with clean and well-lit streets contributing to this.

Major Drivers for Change: Poor infrastructure with poor road conditions, overflowing bins, and neglected public spaces. Safety issues include antisocial behaviour. Economic challenges include with poverty and limited job opportunities affecting community wellbeing.

Significant Opportunities: Potential for community development through activities and collaboration across centres and charities. Green space enhancements could include allotments, benches, and revitalisation of underused areas. Transportation improvements could include traffic calming, better pedestrian crossings, and EV infrastructure.

Critical Challenges: Poor public realm maintenance has been highlighted with examples given in respect of overgrown vegetation and inadequate bin collections. Traffic and parking problems include speeding and illegal pavement parking. Social issues include a lack of youth activities, limited community integration, and perceptions of neglect by the council.

6.61 East End

Key Strengths: Good quality natural spaces, with good connectivity, such as strong public transport links and proximity to amenities. There is a strong sense of community with neighbours supporting one another and a mix of housing types contributing to the area's liveability.

Major Drivers for Change: There are infrastructure issues, with deteriorating roads, neglected pavements, vandalised bus shelters, and poor street cleanliness. Safety concerns include antisocial behaviour. There are economic challenges such as social poverty, a long housing waiting list, and limited employment opportunities.

Significant Opportunities: Community development could be strengthened through better communication and promotion of local hubs. Green space enhancements could include improving overgrown areas to make them more useable. Transportation improvements could include reinstating bus routes, and traffic calming measures.

Critical Challenges: Accessibility is a major concern, with pavement parking, steep hills, and limited transport options affecting those with mobility challenges. Social issues include criminal activity and a lack of youth activities.

6.62 Ferry

Key Strengths: Natural spaces like the beach and Dawson Park, good daytime public transport and walkability, strong community spirit, and general perceptions of safety.

Major Drivers for Change: Deteriorating infrastructure (particularly roads and pavements), safety concerns about traffic speed and street cleanliness, demographic shifts including an ageing population.

Significant Opportunities: Community space development (especially in Balgillo/Barnhill), green space enhancement, urban regeneration of play parks, and transportation improvements including better evening bus services.

Critical Challenges: Inadequate public transport in evenings with limited connections to newer residential developments, poor maintenance of roads and infrastructure, traffic congestion at key junctions, and social issues including limited facilities for teenagers and lack of GP practices.

6.63 Lochee

Key Strengths: Recent renovations to green spaces have enhanced accessibility and aesthetics. The Stack retail park is seen as a major asset, and public transport links are generally strong. Local hubs and churches contribute positively to the social fabric.

Major Drivers for Change: Infrastructure deterioration is a pressing issue, with derelict buildings and neglected public facilities. Pressures from rising housing costs, school overcrowding, and inadequate support for elderly and disabled residents. Economic challenges are reflected in the decline of the High Street and limited local employment.

Significant Opportunities: There could be improved community development through better communication and a more functional community centre. Green space enhancements include converting derelict areas into greenspace. Urban regeneration opportunities include redeveloping derelict sites. Transportation improvements could include extending bus routes, improving pathways, and adding traffic calming measures.

Critical Challenges: Accessibility issues are widespread, with impassable pavements, insufficient lowered kerbs, and long walking distances to bus stops. Infrastructure maintenance is poor. Social issues include a lack of youth activities, limited community integration, and perceptions of neglect by the council.

6.64 Maryfield

Key Strengths: There are exceptional green spaces, with Baxter Park serving as a central community asset. Pocket parks add to daily nature access and visual appeal. The area benefits from strong transport links. Housing diversity and historic architecture contribute to the area's character. Albert Street provides essential services and local shops, while safety during daylight hours is generally perceived as good.

Major Drivers for Change: Key concerns include neglected residential properties, poor energy efficiency in older homes and deteriorating roads and pavements. Safety issues arise from poor lighting in parks and criminal activity.

Significant Opportunities: Improvements to green spaces to enhance their facilities and improve useability. Urban regeneration opportunities include reuse of vacant and derelict sites. Transportation improvements could include traffic calming, expanded cycling infrastructure, and improved bus services and EV charging.

Critical Challenges: Accessibility issues include pavement parking and poor infrastructure maintenance. Issues raised with the transportation network and traffic management within the area. Social issues include criminal activity and antisocial behaviour.

Note: Further place-based investigative work has been carried out in the Maryfield area through the Key Agency Group Collaborative Pilot. The outcomes from this process and report links are set out in the 'Key Agency Group – Maryfield Area Level Workshop Report' (para. 6.75 to 6.81).

6.65 North East

Key Strengths: Natural spaces are highly valued for recreation and biodiversity. Some areas benefit from quiet roads and good public transport links. Strong community bonds are evident and community facilities such as the local hub provides important social spaces.

Major Drivers for Change: Infrastructure deterioration is a major concern, with damaged roads, flooding-related path closures, poor lighting, and neglected green spaces. Safety issues include antisocial behaviour and criminal activities. Issue raised include availability of suitable housing. Limited job opportunities, and housing affordability pressures.

Significant Opportunities: Community development could be improved by green space enhancements, play park upgrades and improved maintenance. Urban regeneration opportunities include improving housing standards and investing in neglected areas. Transportation improvements could include public and active travel enhancements.

Critical Challenges: Accessibility issues are widespread, with pavement parking, poor public transport reliability and access to healthcare. Infrastructure maintenance is lacking, with overgrown areas, poor drainage, and inconsistent bin collections.

6.66 Strathmartine

Key Strengths: There are natural assets, green space and wildlife areas with good accessibility. Public transport is generally reliable, and the area benefits from good pedestrian infrastructure and local amenities. Safety is perceived positively in some areas, with protective features and community wardens contributing to a sense of security.

Major Drivers for Change: Infrastructure deterioration is a recurring issue, especially in play parks, cycle paths, and flood-prone areas. Economic challenges include limited local employment, high heating costs, and a lack of affordable housing.

Significant Opportunities: Community development could be enhanced through better use of existing centres and redevelopment of vacant sites. Urban regeneration opportunities include repurposing empty buildings.

Transportation improvements could include better cycling infrastructure, safer crossings, more bus routes, and more EV charging points.

Critical Challenges: Accessibility issues are widespread, with narrow pavements, pavement parking, and limited transport options affecting disabled residents and families. Infrastructure maintenance is poor, with overflowing bins, neglected parks, and flooding due to inadequate drainage.

6.67 West End

Key Strengths: The area has good natural spaces, which are well used and appreciated for recreation and biodiversity. Public transport is reliable, and the area benefits from good pedestrian and cycling infrastructure. Safety is considered to be positive.

Major Drivers for Change: Infrastructure issues include uneven pavements, potholes, and neglected buildings. Safety concerns are linked to poor street lighting, speeding vehicles, and antisocial behaviour. There is a high concentration of HMOs and a growing student population.

Significant Opportunities: Enhancements through improvements to green space could improve the overall character. Urban regeneration opportunities include revitalising Perth Road and restoring historic features. Transportation improvements could include off-road cycle paths, traffic calming, better bus reliability, and pedestrianisation of key areas.

Critical Challenges: Accessibility issues include narrow pavements, poor lighting, limited disabled access, and insufficient public toilets. Infrastructure maintenance is inadequate, with poor road conditions and neglected play parks. Traffic and parking problems include pavement parking, speeding, and congestion near Ninewells.

Six Qualities of Successful Places (NPF4 Annex D) [DED286](#)

6.68 The six qualities of successful places have been evolving over a number of years and have featured in various Scottish Government publications, including the [Creating Places](#) policy statement from 2013. They are also a significant component of Dundee's current LDP 2019 ([DED088](#)) under Policy 1: High Quality Design and Placemaking, which links to an expanded version of the six qualities within Appendix 1.

6.69 NPF4's Annex D provides a detailed description of the latest version of the six qualities, which are headlined as follows:

1. **Healthy:** Supporting the prioritisation of women's safety and improving physical and mental health
2. **Pleasant:** Supporting attractive natural and built spaces
3. **Connected:** Supporting well connected networks that make moving around easy and reduce car dependency
4. **Distinctive:** Supporting attention to detail of local architectural styles and natural landscapes to be interpreted into designs to reinforce identity
5. **Sustainable:** Supporting the efficient use of resources that will allow people to live, play, work and stay in their area, ensuring climate resilience and integrating nature positive biodiversity solutions
6. **Adaptable:** Supporting commitment to investing in the long-term value of buildings, streets and spaces by allowing for flexibility so that they can meet the changing needs and accommodate different uses over time

Local Community Plans 2022 - 2027 [DED178](#)

6.70 Local Community Planning brings services and the community together at a local level in order to plan and deliver better services in that community. Local Community Planning Partnerships oversee the development and delivery of Local Community Plans for each Ward within the city. The Local Community Plan contains a series of priorities and actions that services and community organisations have agreed to take forward in order to improve the services that local residents need and rely on to ensure that local priorities are being addressed.

6.71 On a more place specific level, Local Place Plans provide an opportunity for communities to improve the places where they live and to achieve change in their local area. Local Place Plans are covered in more detail within the summary of evidence for Policy 25 Community Wealth Building (para. 6.83 onwards).

Dundee City Centre Strategic Investment Plan 2050 [DED067](#)

6.72 In response to the challenges facing Dundee's city centre, a long-term strategic investment plan was approved at Committee during the summer of 2023. The plan involved significant periods of research, development, external consultant collaboration, cross-sector collaboration, and stakeholder consultation over a number of years. This approach aligns with NPF4's Place Principle requirement. The plan also adopts a design-led approach and aims to create a more thriving, connected, liveable, city centre and to increase the opportunities for employment, leisure, tourism, and residential uses. Further information on the city centre project, including the consultant's masterplan for the city centre, is available via this [link](#). The entire project aligns with the policy intent and outcomes of NPF4's Design, Quality and Place.

UNESCO City of Design [DED299](#)

6.73 Dundee is the UK's first and only UNESCO City of Design. The global designation as a Creative City acknowledges Dundee's rich design heritage, its thriving contemporary design sector and a city committed to using design to solve problems and make Dundee a better place to live.

Conservation Areas and Appraisals [DED041](#)

6.74 Conservation Area status is granted to specific historic areas of the city to protect their special character and to ensure their future management. Conservation Areas are areas of special architectural and/or historic interest, the character or appearance of which it is desirable to preserve or enhance. During April 2025 Dundee's seventeen conservation area appraisals were reviewed and updated. The map location of Dundee's conservation areas can be found on [Historic Environment Scotland's Portal](#).

Key Agency Group – Maryfield Area Level Workshop Report [DED171](#)

6.75 Dundee City Council was chosen to receive support from the [Key Agency Group Collaborative Pilot](#). A total of six Local Authorities across Scotland were part of this new style of collective support. Architecture & Design Scotland lead on this project, with a focus on the future development of Dundee's Maryfield Ward during the first half of 2024.

6.76 A series of workshops took place with a range of internal and external stakeholders to provide support to Dundee's City Council's Planning Team. These workshops initiated a place-based collaborative approach with various Council services, key agencies, and representatives from community groups, allowing them to discuss strategic and local matters affecting Dundee and the Maryfield Ward. This process included exercises to explore the Maryfield ward's key strengths, challenges, drivers for change, and opportunities. A Key Agency Group - Corporate Workshop Report [DED170](#) was produced to document the internal workshop processes, and the final outcomes are set out in the Maryfield Area Level Workshop Report. Some key highlights from the outcomes are set out below.

6.77 Strengths

- Good access to high-quality green spaces (Stobsmuir Park, Stobbie (Swannie) Ponds, Baxter Park, community allotments on Old Forfar Road, The Howff, and Slessor Gardens).
- Compact, walkable and accessible area with high-quality built environment and public realm, with a distinctive historic character.
- Stobswell area has many of the elements of a liveable neighbourhood or 20-minute neighbourhood, including access to schools, community facilities, and numerous independent traders on Albert Street.
- Range of community facilities and services (Arthurstone Library, sports facilities, The Yard for disabled young people, Dundee International Women's Centre, and the Wellgate Day Care Support Centre).
- Mix of a student population, green spaces, facilities and diverse local businesses contribute to a sense of identity and belonging.
- Active community engagement through Stobswell Forum and a strong community voice and ownership (establishing Dundee's first Local Place Plan).

6.78 Challenges

- Physical barriers to walking, active travel and stormwater management (known flood-risk areas), including the inner ring road (A90), East Dock Street (A92) and the railway line.
- Topography and busy roads limiting active travel for those with accessibility issues, and a lack of joined-up cycle routes within the quieter areas where there are opportunities for off-road routes. Active Travel Freeway proposals presenting hazards in public parks (Baxter Park).
- Road safety and parking issues related to commuter use of space near shops. More traffic calming measures are required to calm the flow of traffic.
- Need for maintenance and adaptation (e.g. lifts) of historic buildings, however, historic buildings are difficult and expensive to maintain, decarbonize and make accessible.
- Areas with high levels of deprivation and poverty issues, Stobswell West containing one of the highest rates of poverty. Abundance of private landlords and homelessness.
- Issues with local services, including the overconcentration of certain medical facilities, limited school provision, housing quality issues (under-insulated tenement stock), and student housing concerns.
- Ageing population, problems with drug misuse, vacant shops, derelict and potentially contaminated sites, cleanliness, and vandalism, which is affecting resident's sense of safety and quality of the night-time economy.

6.79 Drivers for Change

- A local community with strong ambitions and an established Local Place Plan.
- Implementation of 20-minute neighbourhoods and consideration of mobility, road safety, active travel, and accessibility of all citizens.
- The changing use/nature of city centres when considering liveable neighbourhoods, local living and a shift in focus to hospitality.

- Dundee City Centre Strategic Investment Plan 2050 ([DED067](#)) providing a long-term vision to drive investment and redevelop significant sites.
- Growing industries and new/ improved visitor destinations, e.g. proposed Eden Project as a catalyst.
- The need for overarching green strategy to tackle nature emergency through investment in biodiversity, street trees and in protecting existing trees.
- Societal issues including the cost of living, new work patterns, poor public health, health sector service demands, housing needs, child poverty, aging population, changing demographics, and inequality.

6.80 Opportunities

- There is a strong appetite to improve walkability, connectivity, and to build upon the current active travel network, with opportunities to connect to the NCN1 cycle route and the Dundee Cycle Hub.
- Enhancing streets and spaces through investment in pavement widening and blue-green infrastructure networks (street trees, biodiverse-friendly spaces, community gardens), including meanwhile uses for gap sites (community growing), supporting carbon sequestration, water management, and providing shelter and shade.
- Potential for a district heat network, building upon Abertay and Stobswell district heating networks and connecting with potential industrial opportunities, including renewables at the harbour.
- Developing community gardens to enhance social interactions and climate adaptation.
- Repurposing vacant shop units for different uses (service provision, growing the night-time economy), large-scale retrofit opportunities, repurposing brownfield sites, and developing the Waterfront.
- Development of brownfield land has the potential to introduce more blue-green infrastructure to help combat flooding risk and free up drainage capacity in the wastewater network.
- Strategic investment to tackle issues of poor public health, health sector service demands and local heat and energy strategies.

6.81 The Key Agency Group experience also helped to inform the Dundee Place Standard Survey ([DED229](#)) and the Dundee Place Reports ([DED251](#)), which are evidenced under Policy 14 Design, Quality and Place (para. 6.56 to 6.67).

Dundee Liveable Neighbourhoods

6.82 As part of the preparation for the next Local Development Plan, the Planning team is developing a GIS Liveable Neighbourhoods Tool. The tool will inform the incorporation of 20-minute neighbourhood and local living concepts into policy to enhance service delivery and to improve the quality of life for local residents. Further detail on the Liveable Neighbourhoods project is covered within Schedule 7 Infrastructure First and Local Living, (para. 7.29 to 7.35).

Policy 25 – Community Wealth Building

National Planning Framework 4 [DED201](#)

6.83 Policy 25 Community Wealth Building is to encourage, promote and facilitate a new strategic approach to economic development that also provides a practical model for building a wellbeing economy at local, regional and national levels.

6.84 The policy also outlines that LDPs should be aligned with any strategy for community wealth building for the area. Spatial strategies should address community wealth building priorities; identify community assets;

set out opportunities to tackle economic disadvantage and inequality; and seek to provide benefits for local communities.

Local Place Plans

- 6.85 Community Wealth Building (CWB) is a place-based approach to local economic development, which redirects wealth back into the local economy, and places control and benefits into the hands of local people. CWB can seek to transform our local and regional economic systems to enable more local communities and people to own, have a stake in, access, and benefit from the wealth our economy generates.
- 6.86 The Scottish Government has adopted CWB approaches to economic development as a key practical means to achieve our wellbeing economy objectives outlined in the National Strategy for Economic Transformation (NSET).
- 6.87 CWB can deliver more and better jobs, business growth, community owned assets and shorter supply chains creating greater resilience and supporting net zero ambitions.
- 6.88 Local Place Plans are a planning tool that can positively influence CWB in Dundee. The Scottish Government has introduced Local Place Plans to encourage communities to play an active role in the planning process for their area.
- 6.89 An invitation to prepare Local Place Plans was issued to community groups in Spring 2023. Communities who prepare a Local Place Plan will have the opportunity for their ideas and proposals to be taken into consideration in the preparation of the Local Development Plan. In order to feed into the early stages of the preparation of the new Local Development Plan, Local Place Plans should be submitted by the end of June 2025.

Planning circular 1/2022: Local Place Plans (2022) [DED231](#)

- 6.90 Planning circular 1/2022: Local Place Plan provides guidance to communities and planning authorities on the preparation, submission and registration of Local Place Plans.

PAS Guide for community delivery of Local Place Plans (2023) [DED139](#)

- 6.91 This Guide is designed to support your community through the process of developing a Local Place Plan. This Guide is intended as a resource for community groups who are thinking of leading and delivering a Local Place Plan (LPP) for themselves. It gives you a framework as to how to develop a Local Place Plan for your area and offers suggestions and options for doing so on a limited budget, without professional support.
- 6.92 This Guide specifies that proposals connected to community wealth building linked to changes of use of land or buildings could be classified as development or use of land which could feature in a Local Place Plan.

How to guide in creating Local Place Plans (2021) [DED161](#)

- 6.93 Local Place Plans are a way for communities to achieve change in their local area. They are a tool for local communities to think about how to make their “place” better, agree priorities, and take action (often working with others) to make change happen. They are more than just a plan: they can help your community

understand what it wants to be like in the future, and for working together with your local authority and others to make positive change happen. This Guide is designed to help communities decide whether a Local Place Plan is the right thing for them, and how to go about preparing one. It may also be of interest to anyone else who wants to support local communities in Local Place Planning, for example local authorities or Community Planning Partners.

Stobswell Local Place Plan 2025 [DED383](#)

6.94 The Stobswell Local Place Plan was prepared by the community of Stobswell in association with the Stobswell Forum. The Plan contains a community vision and proposed actions for the Stobswell and District area. The Plan consolidates previous community consultation undertaken over the last six years and brings together the recommendations from these consultations.

6.95 The main purposes in preparing this Plan for the Stobswell community are:

- To guide planning policy and decision- making, public services and investment by Dundee Council, Community Planning Partners, the Scottish Government and other public agencies.
- To provide Stobswell Forum (a Neighbourhood Representative Structure) with a point of reference to respond to planning applications.
- To guide community action and resourcing, including prioritising future spend by Stobswell Forum and exploring its potential to have greater positive community impact.
- To support funding bids for initiatives referred to in the Plan, whether they are led by the local community, public bodies or others.

6.96 The proposed actions, as set out in the Local Place Plan, are summarised below:

1. **Services & Facilities:** Improve access to essential services like banking, shopping, sports facilities, and community spaces.
2. **Better Connections:** Enhance traffic management, pedestrian safety, public transport, and active travel routes.
3. **Community & Culture:** Promote local businesses, green spaces, heritage, and arts.
4. **Quality Homes for All:** Upgrade existing housing, create affordable homes, and improve private rental standards.

6.97 Whilst the Local Place Plan in Stobswell has been produced by the community, Dundee City Council have provided planning representation at the group's meetings to provide information and linkages to key services and contacts within the Council, and the requirements as set out in Circular 1/2022, where required. Contact has been made with other departments within the Council, where relevant, to highlight the registration of the Stobswell Local Place and reference sections of note to them. This will be followed up as the preparation of the Proposed Plan progresses.

West End Community Council Local Place Plan

6.98 The West End Community Council submitted a notice of intent to prepare a Local Place Plan on 4th June 2025. It was noted that the LPP will deliver suggested projects aligned to 4 main themes identified through community consultations.

6.99 This Local Place Plan has been developed by the West End Ward community facilitated by the West End Community Council. The Plan sets out a vision for the future of the West End Ward, drawing from previous consultations in addition to online and in person discussions. The Local Place Plan is a living document, which will evolve through ongoing consultation with the community.

6.100 The boundary of the Local Place Plan aligns with the boundaries of the West End Community Council. Community and community stakeholders were consulted through workshops held throughout 2024 and 2025; as well as in-person discussions with community groups, we utilised online questionnaires and suggestion boxes.

6.101 The Community Vision is for the West End Ward to be a welcoming neighbourhood which offers the ability to live well locally. The proposed projects have been set out under the following themes:

1. Services and Facilities - There was particular support for developing a community hub within the ward, but to also explore utilising existing space further as a hub or series of hubs to further sustain these facilities.
2. Better Connections - The lack of easy, safe and accessible movement around and through the Ward for all transport methods is a concern.
3. Quality Homes for All - The increase in HMOs and STLs is a concern to nearest neighbours, especially in tenement blocks, who feel they have no control over their homes.
4. Community and Culture - Creating a sense of community was a high priority for the community.

Community Wealth Building

National Strategy for Economic Transformation (2022) [DED263](#)

6.102 This Strategy sets out the priorities for Scotland's economy as well as the actions needed to maximise the opportunities of the next decade to achieve our vision of a wellbeing economy.

6.103 This strategy is intentionally focused on a small number of priorities; it does not seek to do everything. It focuses on five policy programmes with the greatest potential benefit and on how to achieve them, rather than address every potentially beneficial action for every industry. The programmes have been carefully chosen, based on the evidence.

6.104 Community Wealth Building is one example of a practical approach to local economic development that supports a wellbeing economy. A Community Wealth Building approach will use public and private investment through procurement and other means to create new employment opportunities, help local businesses to expand, and place more assets in the hands of local people and communities.

6.105 Project 10, of this Strategy, states 'Realise the Potential of the Different Economic and Community Assets and Strengths of Scotland's Regions'. Within this project, it states that Government and the Public Sector will:

- Introduce Community Wealth Building legislation that builds on the successes and learnings of all of the Scottish Government community wealth building local and regional pilot areas in urban and rural Scotland.

Improvement Service: Elected Member Briefing Note – Community Wealth Building (2020) [DED110](#)

- 6.106 The Improvement Service (IS) has developed an Elected Members Briefing Series to help elected members keep pace with key issues affecting local government.
- 6.107 Community wealth building is an approach which supports the development and delivery of a 'wellbeing economy'. Wellbeing economy approaches move away from the prevailing models of economic development focused primarily on growth and look at the success of economies more broadly. This includes whether economies are thriving, how happy people are, how well people participate and how well the environment is maintained.
- 6.108 Community wealth building seeks to increase flows of investment within local economies by harnessing the wealth that exists locally, as opposed to attracting national or international capital. As large employers, the approach that anchor institutions take to employment can have a defining impact on the prospects and incomes of local people. Recruitment from lower income areas, commitment to paying the living wage, and building progression routes for workers are all examples of actions that anchor institutions can take to stimulate the local economy and bring social improvements to local communities.
- 6.109 Anchor institutions are often major local asset holders. These assets represent a base from which local wealth can be accrued. In community wealth building the function and ownership of these assets is deepened to ensure that any financial gain is harnessed by citizens. Furthermore, there is a desire to develop and extend community use of those assets. It should be remembered that much public sector land and facilities are a part of the commons and should be used to develop greater citizen ownership.

A New Future for Scotland's Town Centres (2021) [DED008](#)

- 6.110 Aileen Campbell MSP Cabinet Secretary for Communities and Local Government states that people and communities know their towns best. The Community Wealth Building approach along with Community Empowerment legislation offer exciting ways to deliver on the growing appetite for localism and the need for us to trust and strengthen the opportunities for people to have a stake in the places around them.
- 6.111 Community Wealth Building: Places where community can shape their own future. Where interventions and investments support local businesses, and decisions are taken for the benefit of the whole community. With anchor collaborations acting as local agents of change, making their collective financial power work for their local places. Places that are not only successful in retaining and attracting population but also in attracting and retaining wealth within their communities.
- 6.112 Existing programmes of Community Wealth Building, Place Health and Wellbeing, Active and Sustainable Travel, Climate Action and emerging 20-minute neighbourhood work can all be built upon, reinforced and amplified, adapted as appropriate for the needs of the entire community and town/town centre.

Places, Land and Community Wealth Building in Scotland: An Overview (2022) [DED230](#)

- 6.113 The report assesses the impact of Community Wealth Building (CWB), a local government level policy approach, on existing policy measures in Scotland. Aiming to understand the policy context around the rollout of CWB approaches in Scotland, the report focusses on urban planning and place-based policymaking's relationship with 'land and property'.
- 6.114 In Scotland, early indications show CWB focussing on more land empowerment and socially sustainable approaches to service delivery than seen in the wider UK context.

6.115 CWB has the chance to enhance the rollout and delivery of existing measures. Assessing the existing policy measures, the common areas of policy found show the breadth the approach could take. Particular expansion around council approaches to greening local construction and community-led housing is needed. As of August 2022, few local authorities had explicit CWB plans but the majority of those reviewed had approaches to policymaking specific to an area of service delivery or goal. This was especially true around local authority procurement practice and in audits of their asset holdings.

6.116 A survey of 233 local authority staff was carried out to understand support for a range of Scottish Government policies in land. Findings from the research show staff hold general support for wealth building measures was more common in authorities with more developed policy approaches. The survey also found majority support for CWB and the entailing community-led approaches to land use planning. However, a lower awareness of place-based policymaking in CWB than its economic measures was noted.

Building Community Wealth: consultation paper (2023) [DED023](#)

6.117 The Programme for Government 2022-23 outlined that we will hold a consultation on community wealth building legislation.

6.118 The Scottish Government has adopted the internationally recognised Community Wealth Building (CWB) approach to economic development as a key practical means by which progress can be made towards realising our wellbeing economy vision outlined in the National Strategy for Economic Transformation (NSET).

6.119 In line with the approach itself, legislation on CWB should be bold and ambitious. A significant number of local authorities are now assembling CWB strategies and action plans. In addition, more local authorities and their partners are assessing the potential of CWB to enable the transition to local and regional wellbeing economies, recognising that CWB provides strategic means of connecting all contributory actions across the economy for economic, social and environmental benefit.

2a. Community Wealth Building Dundee

6.120 John Alexander, leader of Dundee City Council, stated that “It has become clear that traditional models of wealth creation haven’t worked and the gap between the haves and have nots in our society is just getting bigger.

6.121 Community Wealth Building focusses on local people and supporting local business to compete for work, to drive wealth back into the community, and puts control and all of the advantages firmly into the hands of local people.”

6.122 Community Asset Transfer allows for the transfer by lease, ownership or other management arrangement of land or buildings currently owned by Dundee City Council provided certain criteria are followed.

6.123 Ownership or control of land and/or buildings can be a powerful way for communities to drive change and achieve their own goals. It can provide opportunities for community groups to develop services or activities, provide stability and sustainability and create a stronger sense of community identity, cohesion and involvement.

6.124 Small projects or community-driven requests could also be considered for city localities in a new scheme being considered by Dundee City Council.

6.125 Community Wishes, under the umbrella of the council's established Community Benefits Policy, could include support for small installations, maintenance, clean-up projects, materials, volunteering time to complete projects or sponsorship.

6.126 The next steps will involve presentations to Local Community Planning groups and communities contacts, a summer launch and first evaluation and monitoring report in summer 2025.

City Governance Committee: Community Wealth Building in Dundee - Progress Update (June 2024) [DED132](#)

6.127 Dundee City Council has made good progress in integrating CWB principles into its key strategies within the Dundee Council Plan 2022-27 and City Plan for Dundee 2022-32. It is also being integrated into relevant service and thematic plans by using the lens of CWB to frame future direction. The CWB working group has continued to take forward actions in each pillar area i.e. making Dundee a CWB place, spending, workforce, finance, land and property and inclusive ownership. The highlights from this report include:

- CWB Coordinator appointed, and Partners Conference delivered in May 2023.
- Communication plan created and awareness raising undertaken with council and external partners.
- A local spend monitoring system is now in place which allows the council to report on local spend. These figures show that 39% of Council procurement spend was spent with Dundee based companies, 58% with companies based in Tayside and Fife and 81% of procurement spend was spent with Scottish Companies and Suppliers (22/23 figures). This compares favourably to an average for Local Authority, local procurement spend of 29.6% for all authorities and 28.9% for comparable Councils (source Local Government Benchmarking Framework). This shows Dundee has the highest local spend figures of comparable councils and 4th highest of all Scottish Authorities.
- Work to encourage local contractor spend in capital programmes also resulted in over £24m subcontract activity being spent locally. Further targeted spend categories are included in the updated Corporate Procurement Strategy 2024-27 (report 156-2024 refers).
- Meet the Buyer Tayside event was held in February 2024, with 545 registrations and 332 individuals attending from 199 different Scottish Companies. 86% of respondents indicated it would make them more likely to bid after attending with 82% feeling more capable of bidding after attending. 90% rated the event as excellent or good.
- A Community Wishes approach will be launched in June 2024.
- Working in partnership with the Council's Climate Team our scope 3 emissions have been mapped that will allow us to better target categories for climate improvement measures. Further details of this will be incorporated into the updated Procurement Strategy 2024-27 (report 156-2024 refers).
- Dundee CWB Procurement Working Group has been established, pulling together procurement managers from anchor partners. Key focus will be on local spend, community benefits and fair work and climate action in procurement.
- The Climate Change participatory budgeting programme was delivered.
- CWB Land and Property Working group has been developed. This internal council group has subsumed the membership and responsibilities of the previous Council Asset Transfer group as well as additional members able to lead on the Land and Property elements of the CWB Action Plan.
- The Dundee Living Wage Action Group continues to drive forward continued support for the Living Wage and had its highest performing year to date and in October 2023 had already achieved 128 Living Wage Employers in the City, covering 43,466 workers and uplifting 2,082 individuals
- The Discover Work Partnership Dundee's Local Employment partnership which includes the Councils Employability service have continued to deliver their academies model as a way of supporting unemployed candidates into employment opportunities. Programmes have been delivered NHS Tayside, Social Security Scotland, Tayside Contracts and within Dundee City Council through the traffic warden's programme. The Council also continues to pilot reserving specific posts for employability clients a model which has potential to be used with other public sector partners.

- Consultation undertaken with generative business organisations including Corporate Development Scotland, DSEN and The Circle.
- Commissioned research to map generative businesses and the support available to them in Dundee, indicating there are 143 inclusive ownership companies in Dundee, 87% Social Enterprises, 13 co-operatives and employee-owned businesses.

Policy and Resources Committee - Community Wealth Building in Dundee (Report No. 312-2021)
[\(DED038\)](#)

6.128 This paper sets the initial planned approach to CWB in Dundee and summaries the CLES research. The paper also outlines the Council's intension to develop a refreshed CWB Action Plan and Strategy which are currently under development. Consideration of a response to National Planning Framework 4 requirements will be part of this Action Plan. While the CLES Action Plan was a helpful tool in establishing a baseline approach, it is recommended that we now build on our own learning and progress to date to include a more focussed and simplified plan in the forthcoming CWB Strategy. This will include easy to understand reporting outcomes which can be used with a range of groups including communities. As well as setting out the strategic direction the strategy and action plan will take forward the priorities going forward. The activities most relevant to this activity are:

- To develop online content that explains the different elements and highlights progress to date with relevant case studies.
- Delivering the procurement change transformation programme which will allow the team to better realise CWB potential of contracted provision.
- Refreshing the Community Benefits Policy in line with CWB requirements.
- Delivering Community Wishes approach as part of that policy.
- Responding to C⁰² monitoring assessment and Inclusive Ownership generative business research.
- Work with anchor partners through the CWB Procurement Working Group to agree local spend targets and identify areas where organisations can work better together to engage local and generative business.
- To develop a Community Land and Asset Strategy which will simplify the process and expand the range of options open to community groups to access, manage or own council properties and a monitoring system which allows the council to better understand and report on community use of council assets including leases.

6.129 The production of this strategy and renewed action plan will also help the council be in line with the likely requirements of the Community Wealth Building Scotland Act which the Scottish Government has committed to enact within this parliament.

Policy and Resources Committee - Annual Procurement Report and Community Benefits Update
[DED018](#)

6.130 In December 2020 the department was tasked with the development of a Community Wealth Building Approach. The recommendations and actions identified in this approach will form part of Dundee's Community Benefits approach going forward and will include:

- Supporting the development of a Community Wealth Building Culture in Dundee;
- Improving baseline reporting around spend;
- Develop a Community Benefits approach across Dundee anchors; and,
- Developing a Community Wish List Approach - these lists will allow local communities to directly influence the community benefits delivered in their areas. It is intended that staff will work with Local Community Planning Partnerships to gather and moderate requests which will be published on an

online portal, which contractors with community benefits requirements within their contracts will be directed to deliver. This is intended to compliment rather than replace the existing community benefit approach.

Dundee City Council are to take the Community Benefits Charter to the Dundee Community Planning partnership in June 2024, and it would be published thereafter.

6.131 A progress report was taken to the City Governance Committee on Monday June 24 and outlined how CWB principles are being integrated into key strategies in the current Dundee Council Plan and City Plan for Dundee.

6.132 It detailed how a local spend monitoring system is now in place which shows levels for Dundee City at 39%, Tayside and Fife (58%) and Scotland (81%) in the year 2022/23.

6.133 A Dundee CWB Procurement Working Group has been established, pulling together procurement managers from anchor partners. The key focus will be on local spend, community benefits, fair work and climate action in procurement.

Dundee Community Wealth Building Strategy and Action Plan (2025-2030) ([DED314](#))

6.134 This Community Wealth Building Strategy and Action Plan complements a range of existing activities that support sustainable economic growth in Dundee. It identifies and supports new initiatives while seeking further opportunities to democratise our activities and give people a real stake in their future. Community Wealth Building harnesses the power and influence of major anchor partners to work collaboratively to maximise the economic and social power of their organisations as major employers, procurers of goods and services, financial institutions, land and property owners and economic drivers for the city.

6.135 The Strategy and Action Plan highlights that the Scottish Government's National Planning Framework 4 (NPF4) states that development proposals that contribute to local or regional community wealth building strategies and are consistent with local economic priorities will be supported. NPF4 also recommends that Local Development Plans are aligned to Community Wealth Building priorities and seek to tackle economic disadvantage and inequality and provide benefits for local communities. This provides a helpful link to Dundee's Local Development Plan.

DATA

Scottish Index of Multiple Deprivation [DED329](#)

6.136 SIMD is a measure of deprivation across Scotland based on seven domains: income, employment, health, education, crime, housing and living environment.

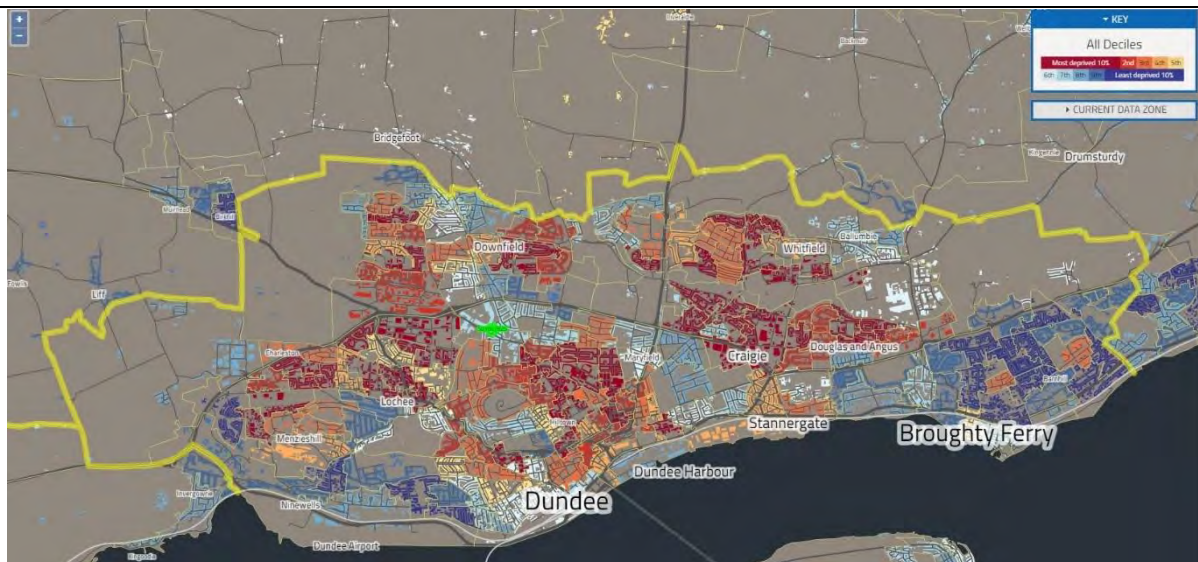


Figure 6.7: Scottish Index of Multiple Deprivation map of Dundee

6.137 As evident in the map above, Dundee has a number of areas within datazones within the most deprived 10% deciles. Community Wealth Building (CWB) is a recognised model of planning and economic development designed to tackle long standing social and economic challenges within Scotland. CWB is a people-centred approach to local economic development. The intention is for wealth to be redirected back into the local economy and place control back to the community.

Sustainable Dundee Map [DED277](#)

6.138 Sustainable Dundee is a city-wide initiative to tackle the Climate Emergency locally and is fully aligned with the UN Sustainable Development Goals (SDGs). This map gives an overview of local initiatives in relation the UN SDG's



Figure 6.8: Sustainable Dundee Map

6.139 The map above shows the many local initiatives currently in place in Dundee to tackle the Climate Emergency locally. This data sources provides an important springboard for CWB initiatives. Community Wealth Building aims to create a fairer and more sustainable local economy. The Council declared a Climate Emergency in 2019, preparing the Dundee Climate Action Plan ([DED073](#)) in response to this. Community Wealth Building presents an opportunity to redesign our local economy and adapt to environmental challenges and opportunities. It also helps us to be more aware of where goods and services come from.

Summary of Stakeholder Engagement

Pre Topic Paper Consultation

6.140 The initial stakeholder working group listed below was developed through internal and external individuals with responsibilities and interests in community wealth building, and design, quality and place. As set out in the list below, the group consisted of internal Dundee City Council representatives and key agency representatives. These topic experts assisted in developing a robust evidence base for the topic paper.

Internal

- DCC Corporate Finance (Community Wealth Building Coordinator)
- DCC Neighbourhood Services (Community Learning and Development)

External

- Historic Environment Scotland
- Dundee Historic Environment Trust
- NHS Scotland

Key Agency Group - Maryfield Area Level Workshops

6.141 As outlined in the Summary of Evidence section, Architecture and Design Scotland delivered a series of workshops focusing on the Maryfield ward area with Dundee City Council's planning team and a range of internal and external stakeholders. The purpose of the workshop was to support the Council's planning team in the LDP evidence gathering process by establishing a place-based collaborative approach with Council services and the Key Agency Group.

6.142 The workshops provided an important opportunity for Council services, key agencies, and representatives from community groups to get together for the first time to discuss strategic and local matters affecting Dundee and the Maryfield Ward. The process included exercises to explore the Maryfield Ward's key strengths, challenges, drivers for change, and opportunities. A Corporate Workshop Report ([DED170](#)) was produced to document the workshop processes.

Topic Paper Consultation

6.143 The Design, Quality and Place Topic Paper (DER006) was published for consultation between 3rd July 2024 and 14th August 2024 and forms the basis for the Summary of Evidence. All stakeholders involved in the preparation of the topic paper were also formally consulted on the published topic paper.

6.144 As outlined in the Summary of Evidence, the Dundee Place Standard Survey ([DED229](#)) was live from April to August 2024 during the full consultation on this topic paper. The survey was designed to be accessible to people of all ages. City Council Communities officers, the Community Empowerment Team, and Education officers were briefed on the surveys and asked to assist anyone facing challenges in completing the survey, for example due to a lack of internet access or language barriers. Physical copies were available in libraries and posters were displayed in community centres to encourage participation, and the surveys were shared among community groups such as Tenants and Residents Groups, 'Friends of groups, Primary and Secondary Schools, Community Councils, and Community Partnerships/Forums. A total of 216 responses were received including a submission from a Blackness Primary School class, who

were assisted in completing the exercise by Planning officers during June 2024. As set out in paragraphs 6.56 to 6.67, the responses from the survey have been assessed and summarised into the key qualitative and quantitative outcomes, which are presented in an online GIS Dashboard (Dundee Place Standard Results 2024) ([DED227](#)) and GIS StoryMaps for all eight Wards within the city (Dundee Place Reports) ([DED251](#)).

6.145 The Planning team worked closely with Dundee’s Community Wealth Building officer. This allowed for there to be linkages between planning and Community Wealth Building in the recently published Dundee Community Wealth Building Strategy and Action Plan. Dundee’s community wealth building officer also provided specific feedback during the Topic Paper consultation and provided helpful text changes, where relevant.

Post Topic Paper Consultation

6.146 Formal responses to the topic paper consultation were assessed and appropriate changes have been incorporated into the Summary of Evidence. Where consultees disputed any of the submitted evidence, resolution email correspondence was conducted to justify our methodology/ position, or to confirm amendments/ additions in alignment with comments.

Engagement Summary Table

6.147 The following table identifies engagement with stakeholders, from the topic paper consultation period onwards, including summary comments and Dundee City Council’s responses. Comments are only provided where contributions from stakeholders led to amendments or additions to the evidence base. Where formal disputes could not be resolved through further engagement they are identified in the table and then further detail is provided within the ‘Statements of Agreement / Dispute’ section.

Stakeholder	Summary Comments and DCC Response
Historic Environment Scotland (STA004)	In agreement with the evidence. Recommended that the summary of implications for the Proposed Plan should include the opportunity to consider more bespoke policy content that addresses specific development management issues that are of particular relevance to the Dundee area. DCC Response: Comments incorporated into Schedule 3.
NatureScot (STA032)	In agreement with the evidence. Recommended including the Scottish Governments document Creating Places. DCC Response: Creating Places incorporated into Schedule 3.
Scottish Water (STA003)	In agreement with the evidence. DCC Response: Comments noted.

Dundee Civic Trust (STA017)	In agreement with the evidence. DCC Response: Comments noted, and acknowledgement email response sent.
Dundee City Council – Community Wealth Building (STA046)	In agreement with the evidence. Additional reports and guides recommended to be included in the evidence to provide further context on Dundee City Council's progress and approach to community wealth building. DCC Response: documents incorporated into Schedule 3.
Homes for Scotland (STA047) Hallam Land (STA043)	Disagree on the implications of the evidence for the proposed plan, but do not dispute the evidence. Both Homes for Scotland and Hallam Land state that the design requirements outlined require to be understood in the context of the national housing crisis, and that current systems may require to be more flexible than the approach set out in the Topic Paper. In the context of the national housing crisis, and the declaration of a housing emergency, viability matters require to be fundamental to the consideration of these types of policies. The socio-economic benefits of home building cannot be understated. Our members contribute millions of pounds annually to infrastructure investment across the district and their role as a principal funder of future investments must be fully recognised, as should their role in the journey towards net zero through the delivery of increasingly energy efficient homes as well as local living neighbourhoods. DCC Response: The design requirements outlined are largely defined by guidance set at a national level and supported within NPF4. These requirements are deemed to be significant and have far reaching benefits across multiple aspects of society and the built environment. The established evidence base supports the various attributes of the Design, Quality and Place topic, which are to be considered on their own merits. To what degree these requirements are to be applied in the context of a national housing crisis will have to be considered on a case-by-case basis during the determination of proposed development. No change to evidence and email confirmation sent.
Private Individual - (STA018)	In agreement with the evidence. DCC Response: Comments noted.
Private Individual - (STA015)	In agreement with the evidence. DCC Response: Comments noted.
Private Individual - (STA040)	In agreement with the evidence.

Suggest that DCC could create a city-wide plan for greening the city to support biodiversity and mitigation of floods and heat waves.

DCC Response: No change to evidence and email confirmation sent, advising of further engagement opportunities during the Call for Ideas and Proposed Plan stages.

Summary of Implications for the Proposed Plan

Policy 7 - Historic Assets and Place

- 6.148 In accordance with Historic Environment Policy for Scotland's ([DED155](#)) good decision-making policies and principles, we will prioritise the preservation of Dundee's historic environment to help deliver Our Past, Our Future's ([DED220](#)) mission to sustain and enhance the benefits of Scotland's historic environment, for people and communities now and into the future.
- 6.149 The intrinsic social, cultural, economic, environmental, and sustainable value of Dundee's historic environment will be integrated into the spatial strategy and any future masterplanning work. Such work will emphasise the importance of protecting, preserving and enhancing these assets into the future, which will likely require a greater understanding of the unique values related to each building, space, place, area and community.
- 6.150 Repurposing buildings at risk is a key priority for all of Dundee, including areas of deprivation where the success rate of saving and repurposing historic buildings is lower.
- 6.151 Place Standard Tool assessments and potential Local Place Plans will be reviewed for the identification of any underrepresented buildings or places of interest which have a cultural value that needs to be recognised.
- 6.152 Consider HES's '[Designed Landscapes of the Recent Past](#)' project, specifically the Olivetti site, and the garden of the Maggie's Centre at Ninewells Hospital. Consider any other publicly underrepresented gardens and designed landscapes dating from 1945 to the early 2000s.
- 6.153 Engagement with Church of Scotland presbytery is required to discuss their estate review and disposals in Dundee, and the potential for repurposing these assets.
- 6.154 The necessity and appropriateness of the current Dundee LDP 2019 ([DED088](#)) policies 49 to 53 will need to be reviewed as there is no need to repeat the general policies on historic assets that have been established within NPF4, however, this does give an opportunity to consider more bespoke policy content that addresses specific development management issues that are of particular relevance to the Dundee area.

Policy 14 – Design, Quality and Place

- 6.155 The collaborative requirement set by the Place Principle is being adopted for all aspects of the development plan process, which will have a positive bearing on the spatial strategy, delivery programme and plan preparation. The Key Agency Group Collaborative Pilot pulled together all of the relevant public, private and community stakeholders to focus attention on the future of Dundee's Maryfield ward. It is

anticipated that the outcomes from the Maryfield Area Level Workshop Report ([DED171](#)) will influence future spatial strategies, place briefs and masterplans.

- 6.156 NPF4's Design, Quality and Place policy requires LDPs to identify where more detailed design guidance is expected, for example, by way of design frameworks, briefs, masterplans and design codes. The data gathered through the Dundee Place Standard Survey ([DED229](#)), Dundee Place Reports ([DED251](#)), Liveable Neighbourhoods Tool, Local Place Plans ([DED186](#)), and the existing evidence within Local Community Plans ([DED178](#)) and Conservation Areas and Appraisals ([DED041](#)) will inform these design guidance opportunities by identifying areas of focus, associated needs, and unique qualities and characteristics. The data will also help to inform the plan preparation, spatial strategy, site allocations, and place-based policies.
- 6.157 The qualitative outputs set out in the Dundee Place Reports ([DED251](#)) are very broad and cover issues out with the remit of Planning. Consequently, the outputs will be shared widely with other City Council service areas for consideration. Considering the planning related matters that were raised there are recurring key themes across all eight wards which will influence the development of the proposed plan, these are primarily concerned with issues around active travel, regeneration of sites, housing needs, local living, and green infrastructure provision.
- 6.158 NPF4's Six Qualities of Successful Places will inform the approach and development of any future design frameworks, briefs, masterplans and design codes. The six qualities are present in the current LDP 2019 ([DED088](#)) and will be updated and integrated into the proposed plan.
- 6.159 The status of the Dundee City Centre Strategic Investment Plan 2050 (CCSIP) ([DED067](#)) has already been approved at Committee as a material consideration in the determination of planning applications. The CCSIP will be integrated into the proposed plan and, where applicable, the plan preparations will be informed by the CCSIP's strategic outcomes and actions.
- 6.160 Dundee's UNESCO City of Design ([DED299](#)) status sets ambitious aspirations for the city's spaces, places and architecture, which emphasises the importance and value in taking a design-led approach in the development of the proposed plan.
- 6.161 The Liveable Neighbourhoods Tool is a continually evolving resource which will provide essential data to help assess, plan and implement the local living concept throughout Dundee. This is likely to play a role in developing the proposed plan's spatial strategy.

Policy 25 – Community Wealth Building

- 6.162 Within Dundee, whilst much of the direction in Community Wealth Building sits within the Communities and Corporate Finance divisions, as this is a place-based approach, there is a role for planning to ensure a proactive approach is taken within the emerging Local Development Plan. Spatial strategies should address community wealth building priorities; identify community assets; set out opportunities to tackle economic disadvantage and inequality; and seek to provide benefits for local communities.
- 6.163 Local Place Plans should outline a community's proposals for the development and use of land, providing a new opportunity for communities to contribute ideas and proposals into the planning system.
- 6.164 Local Place Plans can help communities understand what they want to be like in the future and contribute to the development of a positive community identity.
- 6.165 Local Place Plans registered through the Council will not be part of the Local Development Plan but will inform the preparation of it. Local Place Plans are considered to supplement, rather than replace, existing

means of community engagement in the preparation of a Local Development Plan and through planning applications.

6.166 Dundee City Council currently have two validated Local Place Plans ([DED186](#)), one each for the Stobswell, and West End areas. Both Local Place Plans will feed into the preparation of the current review of Dundee City Council's Local Development Plan. The proposals contained within the validated Local Place Plans have not been assessed for their planning merit or deliverability at the point of registration. This process will be undertaken as the Local Development Plan progresses through Gate Check and onto the Proposed Plan stage.

Statements of Agreement / Dispute

Statements of Agreement

6.167 As outlined within the Summary of Stakeholder Engagement, a significant level of engagement was carried out with multiple stakeholders during pre-consultation, consultation, and post-consultation of the topic paper. The following organisations agree with the evidence base presented:

- Historic Environment Scotland (STA004)
- Nature Scot (STA032)
- Scottish Water (STA003)
- Dundee Civic Trust (STA017)

Statements of Dispute

6.168 There are no areas of dispute for the Design, Quality and Place Topic Paper.

Infrastructure First and Local Living (007)

Issue: Topic / Place	Infrastructure First and Local Living (DER007)
Information required by the Act regarding the issue addressed in this section	Policy 15: Local Living and 20 Minute Neighbourhoods Section 15 (5) • the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district. Section 15 (2A) • a statement of the planning authority's policies and proposals as to the provision of public conveniences. Section 15 (2B) • a statement of the planning authority's policies and proposals as to the provision of water refill locations. Policy 18: Infrastructure First Section 15 (5) • (d) the infrastructure of the district (including communications, transport and drainage systems, systems for the supply of water and energy, and health care and education facilities); • (e) how that infrastructure is used; • (ce) the education needs of the population of the district; and • (cg) the capacity of education services in the district. Regulation 9 Have regard to: • the national waste management plan; • any regional transport strategy; and • any local transport strategy. Policy 24: Digital Infrastructure Section 15 (5) • the infrastructure of the district (including communication systems); and • how that infrastructure is used. Policy 32: Aquaculture Section 15 (5) • the principal economic and environmental characteristics of the district. Regulation 9 Have regard to: • the national marine plan; and • any regional marine plan. Policy 33: Minerals Section 15 (5)

	• the principal economic and environmental characteristics of the district.
Links to Evidence	Policy 15: Local Living and 20 Minute Neighbourhoods • National Planning Framework 4 (DED201) • Dundee Local Development Plan (LDP) 2019 (DED088) • 20 Minute Neighbourhoods in a Scottish Context (DED001) • Local Living and 20 Minute Neighbourhoods: Planning Guidance (DED184) • Masterplan Consent Areas Draft Regulations (DED195) • Regeneration and Area Masterplans (DED245) • Blackness Business Place Plan (DED022) • Dundee Waterfront (DED105) • Site Planning Briefs (DED350) • Dundee City Centre Strategic Investment Plan 2050 (DED067) • Dundee Retail Study 2023 (DED098) • Local Community Plans 2022-27 (DED178) • Local Place Plans (DED186) • Draft Sustainable Transport Delivery Plan 2024-2034 (DED102) • Review of Previous Engagement • Dundee Place Standard Survey (DED229)Key Agency Group – Maryfield Area Level Workshop Report DED171 • Dundee City Council Public Toilets (DED071) • Engage Dundee Survey 2023 (DED112) • Engage Dundee Survey 2021 (DED111) • Hello Dundee (DED150) Policy 18: Infrastructure First • National Planning Framework 4 (DED201) • Dundee Local Development Plan (LDP) 2019 (DED088) • Infrastructure Investment Plan (DED164) • Tay Cities Economic Strategy 2019-2029 (DED283) • Tay Cities Region Deal: Deal Document 2020 (DED284) • Dundee Climate Change Risk and Vulnerability Assessment (2024) (DED074) • National Transport Strategy 2 (DED204) • Dundee City Centre Strategic Investment Plan 2050 (DED067) • Walking and Cycling Index 2023: Dundee (DED104) • Scotland's Learning Estate Strategy (DED267) • Dundee Education Infrastructure (DED080) • Infrastructure Levy for Scotland (DED165) • Dundee Major Developments (DED091) • ESO Pathway to 2030 (DED115) • ESO Beyond 2030 (DED114) • SSEN Network Maps (DED357) • Dundee Sustainable Transport Development Plan 2024-2034 (DED102) • Scottish Water – Top Up Map (water refill stations) (DED272) • Dundee City Council Public Toilets (DED071) • Great British Public Toilet Map (DED133) • Charge Place Scotland (DED069) • Report by Education Scotland Addressing Educational Aspects of the Proposal by Dundee City Council (DED370) • Proposed Western Gateway Primary School With Nursery (21-2023) (DED371) • Developer Contributions Supplementary Guidance (DED053) • Planning and The Housing Emergency: Delivery Plan (DED373) • Subnational Population Projections: 2022-based, Dundee City Council (DED395) Policy 24: Digital Infrastructure • National Planning Framework 4 (DED201)

- Dundee Local Development Plan (LDP) 2019 ([DED088](#))
- A Changing Nation: How Scotland Will Thrive in a Digital World (2021) ([DED002](#))
- Reaching 100% (R100) ([DED239](#))
- Connected Nations (2023) ([DED039](#))
- Connected Nations Spring 2025: Interactive Report ([DED040](#))
- Tay Cities Region Economic Strategy 2019-2039 ([DED283](#))
- Scottish 4G Infill Programme ([DED265](#))
- Shared Rural Network ([DED348](#))

Policy 32: Aquaculture

- National Planning Framework 4 ([DED201](#))
- Dundee Local Development Plan (LDP) 2019 ([DED088](#))
- Marine Scotland - National Marine Plan Interactive ([DED191](#))
- Marine Scotland Planning & Location Guidelines ([DED194](#))
- Shellfish Water Protected Area ([DED349](#))
- Scottish Coastal Observatory Data ([DED260](#))
- Finfish aquaculture sector plan (SEPA) ([DED121](#))

Policy 33: Minerals

- National Planning Framework 4 ([DED201](#))
- Dundee Local Development Plan (LDP) 2019 ([DED088](#))
- Aggregate Minerals Survey 2019 ([DED013](#))

Summary of Evidence

Policy 15: Local Living

National Planning Framework 4 [DED201](#)

7.1 This policy expects Local Development Plans to support local living and 20-minute neighbourhoods through spatial strategies, and associated site briefs and masterplans. This approach must consider local contexts, settlement patterns, and specific characteristics and challenges. Community and business engagement is crucial in this process.

7.2 The policy intent for NPF4 Policy 15 is noted as:

7.3 “To encourage, promote and facilitate the application of the Place Principle and create connecting and compact neighbourhoods where people can meet the majority of their daily needs within a reasonable distance of their home, preferably by walking, wheeling or cycling or using sustainable transport options.”

7.4 Development proposals should enhance local living and, where relevant, support 20-minute neighbourhoods by considering:

- Sustainable transport modes and high-quality walking, wheeling, and cycling networks,
- Local access to employment, shopping, healthcare, social care, education, play areas, green spaces, community gardens, food growth opportunities, sports facilities, public toilets, affordable housing, and diverse housing options that support ageing in place.

National Planning Framework 4, Policy 8: Green belts

7.5 National Planning Framework 4 (NPF4) ([DED201](#)) specifically states ‘LDPs should consider using green belts, to support their spatial strategy as a settlement management tool to restrict development around towns and cities. Green belts will not be necessary for most settlements but may be zoned around settlements where there is a significant danger of unsustainable growth in car-based commuting or suburbanisation of the countryside’.

7.6 Dundee does not currently have a green belt designation. Further consideration of the evidence around Green Belts can be accessed in the Council’s Biodiversity, Natural Places, Trees and Soils Topic Paper.

7.7 The absence of a Green Belt in Dundee does not undermine its potential to foster local living and 20-minute neighbourhoods. Principles of local living, such as supporting active travel and strengthening green

infrastructure, align with NPF4's focus on minimizing urban sprawl, encouraging urban density, and promoting sustainable development on brownfield sites.

20-minute neighbourhoods in a Scottish context- ClimateXChange [DED001](#)

7.8 In February 2021, Climate X Change and Ramboll released a research paper examining '20 Minute Neighbourhoods in a Scottish Context.' This project explored the feasibility of implementing this concept across Scotland, considering the country's diverse settlement patterns. The study aimed to identify strategies that could facilitate its implementation and reviewed international case studies to understand the factors contributing to success. The analysis covered successful elements, impacts on placemaking, challenges, regulatory frameworks, funding mechanisms, and stakeholder engagement. The examples underscored the importance of a well-defined, people-centred plan, developed in collaboration with local stakeholders and tailored to specific local needs, to achieve the desired outcomes. The baselining assessment found that the provision of service (quantity scores) is greater in urban areas, but the satisfaction with community (quality scores) is greater in rural areas. An illustrative example of the combined scoring (i.e. what services and infrastructure are available and their quality) assigned to neighbourhoods within Dundee is shown below in Figure 1.

Scottish Government- Local Living and 20 Minute Neighbourhood Planning Guidance [DED184](#)

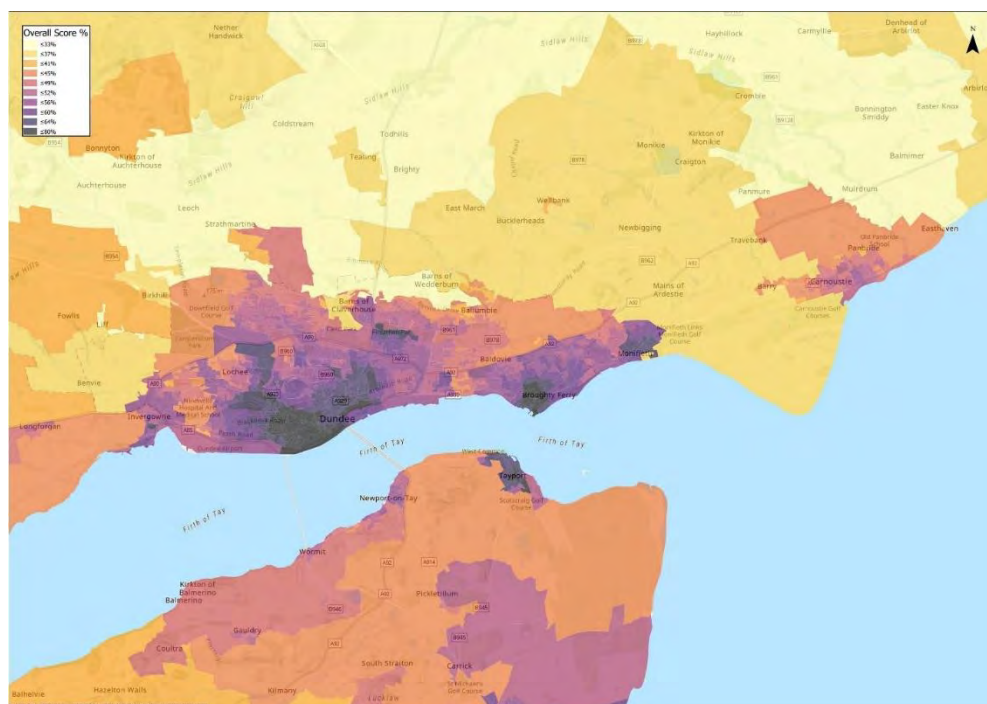


Figure 7.1: Combined quantitative features and qualitative indicators overall for Scottish Context at Dundee extent. Source: Climate X Change/Ramboll

7.9 The guidance on local living and 20 minute neighbourhoods aims to encourage, promote and facilitate the application of the Place Principle and create connected and compact neighbourhoods which prioritise environmental, social and economic sustainability. The Place Principle provides the overarching basis for place-based working, by encouraging a participative approach to planning places, services, infrastructure, land uses, and buildings. It encourages collaborative partnership working with a range of stakeholders, including local communities and community groups, businesses, transport providers, healthcare, and education providers, and across local authority structures.

Masterplan Consent Areas - draft regulations [DED195](#)

7.10 The Planning (Scotland) Act 2019 introduces Masterplan Consent Areas (MCA) as a new upfront consenting mechanism for development proposals. MCA schemes can give several types of consent, including planning permission, plus roads construction consent, listed building consent and conservation area consent – where provided for in the particular MCA scheme. The MCA scheme can include conditions, limitations and exceptions which may cover aspects such as development parameters, design and environmental matters. When the regulations are finalised, Dundee City Council planning authority will consider preparing MCA schemes which set out details of what is being consented for as a mechanism for enhancing local living.

Dundee Local Development Plan 2019 [DED184](#)

7.11 Dundee's current Local Development Plan does not have a specific policy on Local Living/20-minute neighbourhoods. However, it is already concurrent with the aims of the approach.

7.12 Policy 31: Development within the Open Countryside sets out the approach that new development in the open countryside, out with those areas designated for such in the Plan, will only be permitted in specifically defined circumstances and that there will otherwise be a general presumption against all such development. By minimizing development on greenfield sites (previously undeveloped land), the policy encourages urban growth to occur in a manner that reduces sprawl. Concentrating development within existing urban boundaries helps reduce the need for residents to travel long distances for work, services, or amenities. The policy encourages the reuse of brownfield sites (previously developed land that is not currently in use) for new development. This regeneration helps maintain existing urban communities, infrastructure, and amenities, enhancing local living by creating vibrant, mixed-use environments that are more sustainable and self-sufficient.

7.13 The current LDP designates Principal Economic Development Areas, Specialist Economic Developments Areas, General Economic Development Areas, Commercial Centres, and District Centres. Class 4 (Business), Class 5 (General Industry) and Class 6 (Storage and Distribution) developments are supported in areas where the principal uses are already industrial/business. This helps to maintain a balance between residential areas and economic activities. District Centre and Local Shopping Provision policies promote mixed-use development within District Centres and support small-scale retail in local shopping parades. Four Commercial Centres in Dundee provide an important complementary role to the shopping hierarchy within the City.

7.14 Policy 21: Town Centre First Principle states that all new or expanded uses that will generate significant footfall should be located in the City Centre or District Centres. This advocates for concentrating services and amenities in accessible locations and reducing car dependence by promoting a mix of services. Therefore, the Town Centre First and local living approaches can be aligned to ensure easy access to essential services and amenities fostering healthier, more connected communities.

7.15 The LDP recognizes a hierarchy of centres with the city centre at the top, followed by district centres and then local centres. District centres in Dundee serve as important focal points for local communities and are intended to meet the day-to-day needs of residents in their respective areas. District centres are strategically located to ensure accessibility for a large portion of the population. Mixed-use developments and housing developments within or adjacent to district centres are supported to increase footfall and support local businesses. New retail and commercial proposals are directed to district centres first, aligning with the Town Centre First Principle. Policy 22 (City Centre Retail Frontages) and Policy 23 (District Centre Retail Frontages) requires to be reviewed to accommodate changes to the Use Classes Order and permitted development rights.

7.16 The below map shows 10-minute walking distances from centroids (centre points) of the city centre and district centre boundaries. Further mapping using GIS data will help us to identify local centres which function by meeting daily needs and serve residents out with these areas.

Site Planning Briefs [DED350](#)

- 7.20 Site Planning Briefs are prepared by the Council in consultation with local communities and interested parties to provide site specific guidance to developers and others regarding the development of potential sites. These have been historically implemented in residential developments and to bring vacant buildings back into use.

Dundee City Centre Strategic Investment Plan 2050 [DED067](#)

- 7.21 In response to the challenges facing Dundee's city centre, a long-term strategic investment plan was approved at Committee during the summer of 2023. The plan involved significant periods of research, development, external consultant collaboration, cross-sector collaboration, and stakeholder consultation over a number of years. This approach aligns with NPF4's Place Principle requirement. The plan also adopts a design-led approach and aims to create a more thriving, connected, liveable, city centre and to increase the opportunities for employment, leisure, tourism, and residential uses. The external consultant also produced a masterplan for the city centre which incorporates aspects of local living including active travel connectivity and affordable housing.

Dundee Retail Study 2023 [DED098](#)

- 7.22 The 2023 Retail Study includes an analysis of the provision of corner shops in terms of walking from home to the nearest shops. The study demonstrated that outer west and northwest Dundee were the least well served areas.
- 7.23 Findings from the study suggested that the next LDP should support quality upgrades and refurbishment of some convenience floorspace in the City Centre and District Centres, together with support for some additional new neighbourhood shops in 20-minute catchment areas where needs are identified.
- 7.24 The review identifies potential locations for additional small scale convenience store provision based on planned housing expansion in Dundee. Sites could be included in the next LDP if justified, to enhance 'local living'.
- 7.25 According to the study, Dundee is well provided-for in terms of the number and distribution of drive-through restaurants. The distribution of drive-throughs is mostly in retail parks and other out of centre sites. Many are along the A90 and cater for people driving along the route. Given these are generally located within industrial or business areas or require access to be taken over the busy A90 from housing areas, they do not contribute positively to the principles of local living.

Local Community Plans 2022 - 2027 [DED178](#)

- 7.26 Local Community Planning brings services and the community together at a local level in order to plan and deliver better services in that community. Local Community Planning Partnerships oversee the development and delivery of Local Community Plans for each Ward within the city. Local Community Plans contain a series of priorities and actions that services and community organisations have agreed to take forward in order to improve the services that local residents need and rely on to ensure that local priorities are being addressed. A Local Community Plan has been developed for each of the eight electoral wards. However, there is an expectation that the plans will be renewed and, if required, updated and republished annually with the engagement of the general public, partners and communities.

Local Place Plans [DED186](#)

- 7.27 On a more place specific level, Local Place Plans provide an opportunity for communities to develop proposals for their local area, expressing their aspirations and ambitions for future change. Local Place Plans are covered in more detail through the initial summary of evidence for Policy 25 Community Wealth Building.

Community Wealth Building helps us to be more aware of where goods and services come from, and Local Place Plans can positively influence the delivery of 20-minute neighbourhoods in Dundee.

Draft Dundee Sustainable Transport Delivery Plan 2024-2034 [DED102](#)

7.28 This draft plan covers the period 2024-2034 and outlines key strategic priorities and projects, including Active Freeways, school streets, and mobility hubs. Upon adoption, these initiatives will be integrated into the LDP review, including Liveable Neighbourhoods mapping and strategic planning, to ensure the creation of high-quality, sustainable places that meet the city's transport needs.

Dundee Liveable Neighbourhoods

7.29 As part of the preparation for the next Local Development Plan, our Planning team is developing a strategy to incorporate 'local living and 20 minute neighbourhood' concepts into policy. This aims to enhance service delivery and improve the quality of life for the residents of Dundee. The 'Dundee Liveable Neighbourhoods' project seeks to provide early engagement and essential data for the upcoming Local Development Plan and to inform development management decisions. Within the context of the Dundee City Council area, the implementation of the 'local living and 20 minute neighbourhood' approach will result in people having access to the majority of daily needs within a 20 minute (round trip) walk, wheel or cycle from their homes.

7.30 The Dundee Liveable Neighbourhoods project commenced during January 2022 and will run until the Proposed Plan Examination stage, which is projected for late 2026/ early 2027. A 'snapshot in time' of the data will be produced for Proposed Plan Examination stage, however, depending on resourcing, the intention is to make the data analysis continuous so that it is useful for future decision making. The project aims to achieve the following strategic goals:

- Develop a reliable GIS spatial data tool for evidence-based decision-making: 'Liveable Neighbourhoods Tool'.
- Identify opportunities to create "Liveable Neighbourhoods" based on walking accessibility to local amenities.
- Evaluate connectivity in upcoming growth areas and their access to services.

7.31 The Liveable Neighbourhoods Tool is currently in development using GIS network analysis with a 10-minute walk time metric. The network-based calculation ensures that distances are more reflective of obstacles to walking and not an 'as the crow flies' measurement. Datasets have been identified through the Scottish Government's 'Local living and 20 minute neighbourhoods: planning guidance' ([DED184](#)) and engagement with various stakeholders. An interactive GIS dashboard is being created to help visualize and analyse the fourteen themes of the Local Living Framework, which align with the [Place Standard Tool](#) and the [Place and Wellbeing Outcomes](#).



Figure 7.3: The Local Living Framework, Local living and 20 minute neighbourhoods: planning guidance ([DED184](#))

7.32 The data is being utilised to better understand the settlement patterns, characteristics, and challenges of the city's eight wards. As data becomes available or is updated, for example, ongoing open space audit network analysis data, this will be added to the tool to enhance reliability. The below table lists all data sources being integrated to contribute to a sufficient evidence base for meeting the aims of NPF4 Policy 15.

MOVEMENT		
National Public Transport Access Nodes (NAPTAN)	Core Paths	List of Public Roads
OS Mastermap Highways	Cycle Parking and Storage	EV Charging Points
Network- Roads, Paths	Spatial Hub Cycle Path Network	
Dundee Green Circular		
SPACE		
Open Space Audit	Play Sufficiency Assessment	NatureScot SiteLink
OS Mastermap Topography	Urban Releaf Citizen Science Project	District Centres
Biodiversity Storymap	Historic Environment Scotland HLA Map	Community Gardens and Allotments
SportScotland Sports Facilities	Community Sports Hubs	
RESOURCES		
Geolytix Retail Points	OS Mastermap Sites	NHS Inform Scotland's Service Directory
Schools and Nurseries	SSEN Transmission Assets	Employment Land Audit
Local Area Energy Plan	Corporate Address Gazetteer	OpenStreetMap
Community Centres	Post Office Branch Finder	Libraries
Public Health Scotland Care Homes and GP Practices	Google Maps	Places of Worship in Scotland, Scottish Church Heritage Research
Link Cash Locator	Housing Land Audit	
CIVIC		
Police Scotland Police Stations	OS Mastermap Sites	HES Scheduled Monuments

Dundee Open Doors Programme Locations	HES Listed Buildings	Conservation Areas
UNESCO Cultural Contacts Database	Monuments and Sculptures	

STEWARDSHIP

Grounds Maintenance	Scottish Index of Multiple Deprivation	Place Reports
Community Council Areas	Recycling Facilities	

Figure 7.4: Dundee's Liveable Neighbourhoods Tool sources

- 7.33 Demographics data is taken from National Records of Scotland and the Office for National Statistics.
- 7.34 The data required to inform the Liveable Neighbourhoods Tool is extensive and continuously under review. The Planning Team invites the identification and sharing of additional datasets that could help enhance our understanding of the accessibility of facilities and services for Dundee residents.
- 7.35 The table below identifies some data gaps and the challenges in sourcing/integrating them into the Liveable Neighbourhoods Tool.

Data Gap	Reason
Grey open spaces	Lack of standardized definitions, fragmented datasets and a historic focus on green spaces over grey spaces. The dynamic nature of urban areas makes categorization difficult. However, satellite imagery and local knowledge will be used to identify grey open spaces in the formulation of the Open Space Strategy.
Restaurants/ cafes/ hotels	The Humanitarian layer of OpenStreetMap includes some of this information but it has not yet been through a ground-truthing process. It is important to note that the situation changes frequently and the data will be required to be reviewed and updated regularly to stay up-to-date.
Access to co working spaces	There is a lack of standardized classification for co-working spaces under traditional planning categories. They often fall into a grey area between "office" and "flexible working space" and there are varying definitions. The market is dynamic and smaller spaces may operate without formal registration. Consultation with local businesses in future LDP stages may help to identify key issues surrounding this topic.
Affordability of goods and services and consumer satisfaction	Whilst data exists on the location of facilities and services, it is difficult to accurately determine the quality and affordability of goods and services they provide. There is a lack of information on the public's perceptions and uses of the centres in Dundee. An analysis of existing market research may help to fill this gap.

Review of previous engagement

- 7.36 As part of the Liveable Neighbourhoods project in December 2023, a review was conducted of previous engagement activities conducted by Dundee City Council. This review provided a deeper understanding of community needs, helped avoid redundancy, and ensured strategic alignment to maximize impact. Lived experience data was gathered from various sources, including Local Community Plans, Engage Dundee, Hello Dundee, Community Masterplans, and Regeneration Frameworks. This data will be used to develop locality profiles and create a foundation for collaboration in the next stages of the LDP process. Please refer to Appendix 4 for more details.

7.37 Our Local Community Plans 2022-27 for each Ward are still very much relevant and provide important insights into what change is required and the priorities of communities. Engage Dundee 2021 ([DED111](#)) was an important engagement exercise highlighting key issues by Ward. 81.4% of respondents across all Wards felt that there is a positive range of facilities and amenities where they live e.g. community centres, libraries, shops, schools, chemists, health centres (see Appendix 5).

Dundee Place Standard Survey [DED229](#)

7.38 Information about service type and location is not enough to fully understand the situation and needs of Dundee's communities and therefore we must consider the quality, suitability, affordability and accessibility of services to a wide range of residents. Building on the extensive work done in preparing the current Local Development Plan, the planning team created an online GIS version of the Place Standard tool to gather valuable local knowledge and insights from communities about their priorities and the specific challenges they face. An overview and key outcomes from the survey is provided under policy 14 Design, Quality and Place, section (para. 6.56 to 6.67).

Key Agency Group – Maryfield Area Level Workshop Report [DED171](#)

7.39 The Key Agency Group have supported Dundee City Council to adopt a place-based collaborative approach to development plan preparation. Using the Place Principle in practice, workshops were undertaken to understand the strengths and opportunities for the Maryfield Ward, collectively map and analyse evidence, and develop a shared ambition for the future of the area. Further detail and links to the reports are evidenced under policy 14 Design, Quality and Place, (para. 6.75 to 6.81).

Water Fountains and Refill Stations [DED272](#)

7.40 There are currently only two water refill stations in Dundee as outlined by Scottish Water. These are located in Slessor Gardens and the Murraygate in the city centre. These are mapped by Scottish Water in the [Top Up Map](#).

Public Conveniences ([DED071](#))

7.41 Section 15(2A) of the Town and Country Planning (Scotland) Act 1997 states that a local development plan is to include a statement of the planning authority's policies and proposals as to the provision of public conveniences. The below map shows all 20 public toilets maintained by Dundee City Council, two of which are currently awaiting repair. Further information on opening times and available facilities can be found on the Dundee City Council website ([Dundee Public Toilets](#)).

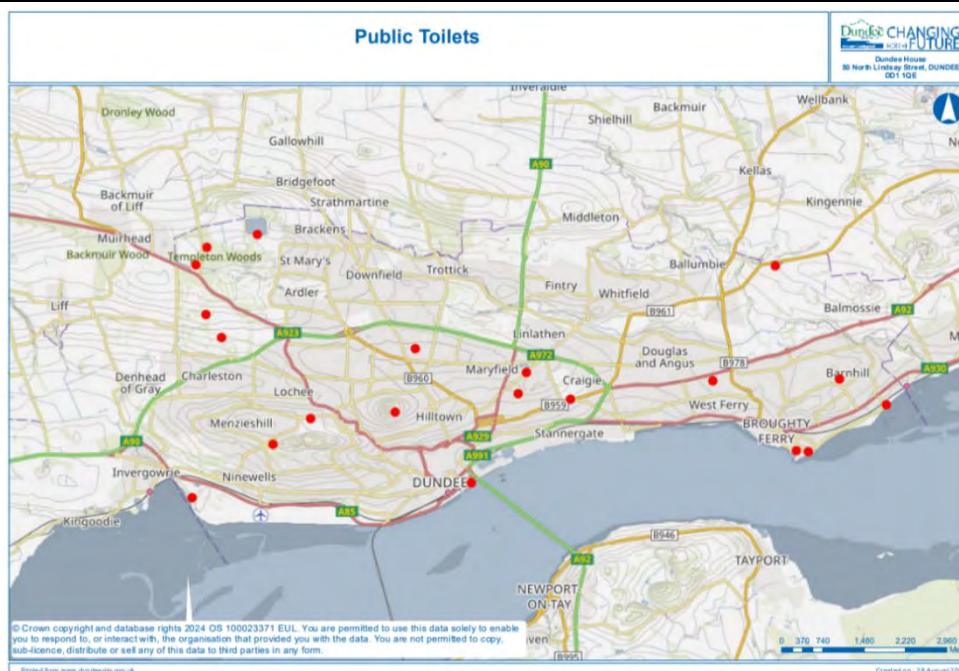


Figure 7.5: Public Toilets distribution Dundee

Policy 18 - Infrastructure First

National Planning Framework 4 [DED201](#)

- 7.42 Policy 18 of the National Planning Framework 4 (NPF4) promotes an infrastructure first approach that encourages the facilitation and early adoption of infrastructure within placemaking. This approach intends to improve the quality and accessibility of infrastructure by responding to the needs of a place and its communities.
- 7.43 The policy sets out specific requirements for Local Development Plans (LDP) to support the integration of an infrastructure first approach:
- be informed by evidence on infrastructure capacity, condition, needs and deliverability within the plan area, including cross boundary infrastructure,
 - set out the infrastructure requirements to deliver the spatial strategy, informed by the evidence base, identifying the infrastructure priorities, and where, how, when and by whom they will be delivered; and
 - indicate the type, level (or method of calculation) and location of the financial or in-kind contributions, and the types of development from which they will be required.
- 7.44 Proposed plans should align with relevant national, regional and local infrastructure plans and policies and take account of the Scottish Government infrastructure investment hierarchy and sustainable travel and investment hierarchies in developing the spatial strategy.
- 7.45 The table below outlines infrastructure outlined by NPF4 which is specifically relevant to the Infrastructure First Policy and where within the DCC Evidence Report it is assessed,

Legislative Requirements - Section 15(5)

- 7.46 The table below outlines where the Evidence Report has addressed the requirements, as specified in Sections 15(5) of the 1997 Act (as amended),

Town and Country Planning (Scotland) Act 1997	
Form and content of local development plans;	
Section 15 (5)	Schedule

(a)	the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district,	DER002 , DER003 , DER004 , DER005 , DER006 , DER007 , DER008 , DER009 , DER010 , DER011
(b)	the principal purposes for which the land is used,	DER002 , DER003 , DER004 , DER005 , DER006 , DER007 , DER008 , DER009 , DER010 , DER011
(c)	the size, composition, health and distribution of the population of the district,	DER005
(ca)	the housing needs of the population of the area, including, in particular, the needs of persons undertaking further and higher education, older people and disabled people,	DER009
(cb)	the availability of land in the district for housing, including for older people and disabled people,	DER009
(cc)	the desirability of allocating land for the purposes of resettlement,	DER009
(cd)	the health needs of the population of the district and the likely effects of development and use of land on those health needs,	DER005
(ce)	the education needs of the population of the district and the likely effects of development and use of land on those education needs,	DER007
(cf)	the extent to which there are rural areas within the district in relation to which there has been a substantial decline in population,	DER009
(cg)	the capacity of education services in the district,	DER007
(ch)	the desirability of maintaining an appropriate number and range of cultural venues and facilities (including in particular, but not limited to, live music venues) in the district,	DER011
(d)	the infrastructure of the district (including communications, transport and drainage systems, systems for the supply of water and energy, and health care and education facilities),	DER002 , DER004 , DER005 , DER007 , DER008
(e)	how that infrastructure is used,	DER002 , DER004 , DER005 , DER007 , DER008
(f)	any change which the planning authority think may occur in relation to any of the matters mentioned in paragraphs (a) to	DER002 , DER003 , DER004 , DER005 , DER006 , DER007 , DER008 , DER009 , DER010 , DER011

Figure 7.6: Sections 15(5) of the 1997 Act (as amended)

Infrastructure Condition and Capacity

7.47 The NPF4 glossary outlines specific infrastructure that should be applied against the Infrastructure First Policy. The following table specifies where within the report these categories of infrastructure have been assessed,

Infrastructure that NPF4 outlines for the purpose of applying Infrastructure First Policy,	Included within Schedule 3	Paragraph
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Communications	Including Digital and Telecommunications Infrastructure and services	Infrastructure First	
Transport	Existing and Planned Transport Infrastructure and services	Sustainable Transport	
Water Management	Supply, drainage systems and sewerage (including flood risk management)	Water Environment, Open Space, Play and Sport	
Energy	Energy supplies/energy generation – including electricity and heat networks, distribution and transmission electricity grid networks, and gas supplies	Climate Change	
Health and Social Care	Including both services provided in the community directly by Health Boards and services provided on their behalf by contractors such as GPs, dentists and pharmacists;	Health and Safety	
Education	Including early years, primary, secondary, further and higher education services	Infrastructure First	
Natural Infrastructure	Blue and Green Infrastructure	Water Environment, Open Space, Play and Sport	
Recreation Infrastructure	Spaces for Play and Recreation	Water Environment, Open Space, Play and Sport	

Figure 7.7, Infrastructure that NPF4 outlines for the purpose of applying Infrastructure First Policy

Dundee Local Development Plan 2019 [DED088](#)

- 7.48 Dundee City Council's current LDP (2019) includes a range of policies which support the delivery and safeguarding of a broad range of infrastructure.
- 7.49 Policy 1: [High Quality Design and Placemaking](#) states that design and siting of development should respect the character and amenity of the place, create a sense of community and identity, enhance connectivity and incorporate creative approaches to urban design, landscaping and green infrastructure, appropriate to the local context and the scale and nature of the development.
- 7.50 Policy 10: [Design of New Housing](#) directs that the design and layout of new housing developments in Dundee should be of a high quality and contribute to creating places that respect and enhance the distinct character and identity of the different parts of the City.
- 7.51 All new housing developments will need to ensure that the design and layout respects and enhances the character of adjoining properties and the surrounding area and does not have a detrimental impact on residential amenity and parking.
- 7.52 Policy 20: [Funding of On and Off Site Infrastructure Provision](#) principles guide the requirement for contributions and the preparation of the Developer Contributions Supplementary Guidance are developer contributions will be sought where a need for new or improved services, facilities or infrastructure has been demonstrated that relates directly to the requirements or impacts of a proposed development.
- 7.53 Policy 28: [Protecting and Enhancing the Dundee Green Network](#) states development proposals shall protect and enhance the Dundee Green Network by ensuring that development will not lead to the fragmentation of the existing network of green infrastructure.
- 7.54 New development should contribute to the Dundee Green Network where appropriate and as determined by the council, through the integration of green infrastructure in masterplans or development frameworks and the creation and/or improvement of green infrastructure within development sites or in the local area.
- 7.55 Policy 29: [Outdoor Access and the Dundee Green Network](#) will seek to safeguard, improve and extend the network of outdoor access routes, with particular emphasis on the Core Path network and routes identified in the Dundee Cycling Strategy which support the development of the Dundee Green Network.

- 7.56 Policy 30: Green Infrastructure Maintenance will apply planning conditions or Section 75 obligations to planning permissions to make suitable provision for the long-term maintenance of green infrastructure (including open space and landscaping associated with Sustainable Drainage Systems) in new housing developments.
- 7.57 Policy 37: Sustainable Drainage Systems states that surface water discharging to the water environment from new development must be treated by a Sustainable Drainage System (SuDS) except for single houses or where discharge is to coastal waters. Proposals will be encouraged to adopt an ecological approach to surface water management, ensure an appropriate level of treatment and exploit opportunities for the system to form an integral part of the Dundee Green Network through habitat creation or enhancement through measures such as the formulation of wetlands or ponds.
- 7.58 Policy 46: Delivery of Heat Networks policy proposes the new development should meet their heat demand through heat networks, by considering the feasibility to create or link into an existing energy centre and heat network or demonstrate the capability to progress towards this technology in the future.
- 7.59 Policy 47: Wind Turbines Proposals involving the production of energy by wind turbines will be supported subject to the Council being satisfied that there will be no unacceptable negative effects from wind turbines individually or cumulatively. The development of wind turbines should not have an adverse effect, either alone or in combination with other proposals or projects, on the integrity of any Natura site.
- 7.60 Policy 58: Digital Connectivity encourages developers to explore, in consultation with service providers, opportunities to provide digital infrastructure to new homes and business premises as an integral part of proposed development.

Developer Contributions Supplementary Guidance [DED053](#)

- 7.61 DCC's Developer Contributions Supplementary Guidance outlines the framework for securing fair and proportionate financial contributions from developers to support infrastructure needs.
- 7.62 These contributions are guided by Policy 20 of the existing LDP ([DED088](#)) and are intended to ensure that developments are sustainable and well-integrated into the community. Contributions are sought for education, transport infrastructure, green networks, public art, healthcare and waste facilities, depending on the location and nature of the development. Specific areas such as the Western Gateway, Whitfield, and Eastern Dundee have tailored requirements, including school provision and transport upgrades. For education, contributions are calculated per house (with exemptions). Transport related contributions may include road improvements, cycle infrastructure, and public transport support. Green network contributions aim to enhance access to the natural environment, increase the amount green open space and enhance biodiversity. Developments over £1 million must allocate 1% of construction costs to public art in publicly visible areas.
- 7.63 Dundee City council currently seeks developer contributions for education infrastructure. These are generally sought in areas experiencing growth in student population (primary & secondary). Contributions are calculated per residential unit, with greenfield developments typically incurring higher costs than brownfield sites. For example, in greenfield locations, the contribution for primary education is £4,989.68 (Index Linked) per house, brownfield areas (Whitfield) are £4,098.24 (Index Linked) per house. These measures ensure that new housing developments do not place undue pressure on existing school infrastructure and that adequate educational facilities are available to support growing communities.
- 7.64 The guidance ensures that all contributions are managed appropriately through legal agreements or planning conditions and are monitored to deliver infrastructure improvements.

Infrastructure Investment Plan [DED164](#)

- 7.65 The Scottish Government's Infrastructure Investment Plan promotes a place-based approach for the provision of infrastructure. Through prioritising a place-based approach, the plan supports resilient and sustainable development for new spatial strategies that align with the plans further investment programme and principles.
- 7.66 The Scottish Government has produced a new investment hierarchy framework (fig*), that prioritises the redevelopment or repurposing of existing infrastructure over the development of new assets. The plan recommends that where an existing asset cannot be repurposed, a demonstrable service need for a facility

is required before the development of new infrastructure. This approach seeks to protect our environment and ensure value for money.

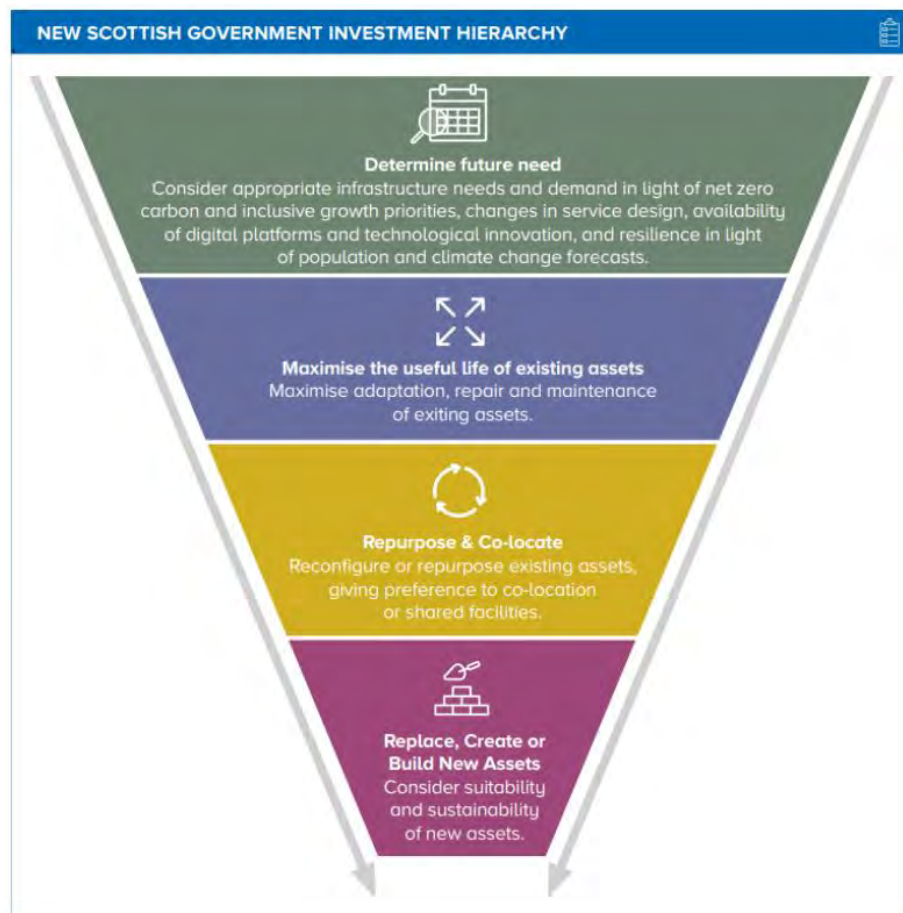


Figure 7.8: Scottish Government Investment Hierarchy

Tay Cities Region Economic Strategy 2019-2039 [DED283](#)

7.67 The Tay Cities Region (TCR) is a collection of local authorities that cover East Central Scotland, made up of Angus, Dundee, Perth & Kinross and part of North Fife. The economic strategy sets out a regional strategy for proposed programmes and projects which relate to the City Deal investment agreement, that support economic growth within the region.

7.68 A focus of the Economic Strategy is to take a place principal (place-based) approach. Effectively ensuring that the principals of the economic strategy address and respond to the needs of those who live and work in a specific area, utilising existing resources, and creating strategies that are successful and sustainable. The strategy notes that a more joined-up, collaborative, and participative approach to services, land and buildings, across all sectors within a place, enables better outcomes for everyone and increased opportunities for people and communities to shape their own lives.

Tay Cities Region Deal: Deal Document 2020 [DED284](#)

7.69 The Tay Cities Region Deal prioritises the early adoption of digital infrastructure, highlighting the potential opportunity to secure over 6,000 quality jobs and 'lever' in £400 million of investment over 15 years.

Dundee Climate Action Plan 2019 [DED073](#)

7.70 The Dundee Climate Action Plan 2019 has been assessed within the Climate Change Schedule ([DER002](#) - [2.98](#)). The plan specifically identifies energy, transport, waste and resilience as its main action plan themes.

The plan details that placemaking can improve all four by prioritising collaboration within council infrastructure project at the pre-design stage.

- 7.71 The plan states that Land Use Planning should identify, evaluate and decide on different options for the use of land, and the subsequent formulation and promulgation of plans or regulations that describe the permitted or acceptable uses.

National Transport Strategy 2 [DED204](#)

- 7.72 Transport is a large part of Dundee's infrastructure system. This National Transport Strategy 2 (NTS2) highlights that spatial planning can play a key role in addressing a number of challenges for our places but needs to be properly aligned with transport planning to realise its full potential. The places where we live, and work can have important impact on our health and wellbeing. As our land use has continuously evolved, some places have become less sustainable and would benefit from renewal and improvement.

- 7.73 The strategy outlines that development should not be located in areas that are hard to reach and not well served by public transport as this can result in long journeys to access shopping and work, therefore discouraging walking and cycling and encouraging more car use.

- 7.74 NTS2 has been assessed further within the Sustainable Transport Schedule ([DER003](#)).

Dundee City Centre Strategic Investment Plan 2050 [DED067](#)

- 7.75 The Dundee City Centre Strategic Investment Plan 2050 was approved by committee in 2023, in response to the challenges facing Dundee's city centre. The long-term strategic investment plan development was broadly collaborative, involving significant research, development, and consultation with a broad range of stakeholders.

- 7.76 The plan outlines a strategy to increase the vitality and liveability, of the city centre and to increase the commercial opportunities and employment, within leisure and tourism. There are significant opportunities for mixed-use development in and around Dundee's city centre.

- 7.77 A theme of the strategic plan is the importance of the infrastructure, and specifically active travel infrastructure. The plan identifies opportunities to provide active infrastructure that enhances public health, air quality and road safety, while supporting other sustainable transport systems.

- 7.78 The Dundee City Centre Strategic Investment Plan has been assessed further within the Town Centre First and Economy ([DER011](#)).

Dundee Walking and Cycling Index 2023 [DED104](#)

- 7.79 The Dundee Walking and Cycling Index developed by Sustrans details that participation in walking, wheeling and cycling on a regular basis has decreased since 2021. There is clear demand for improved active travel infrastructure, with 62% of people agreeing that increasing the space for socialising, walking, wheeling and cycling on their local high street, would improve their local area.

- 7.80 The index notes that neighbourhoods should be places for children to thrive, and if we design neighbourhoods with children in mind, they will then work better for everyone else too.

- 7.81 The Dundee Walking and Cycling Index 2023 has been assessed further within the Sustainable Transport Schedule ([DER003](#)).

Scotland's Learning Estate Strategy [DED267](#)

- 7.82 The strategy outlines the Scottish Government's objective to develop a Learning Estate that supports excellence and equity for all. The Scottish Government intends to develop an estate that takes a place-based approach. Within the strategy, an infrastructure first approach is echoed in its aims to create an education estate that meets the needs of all pupils, utilising existing infrastructure and creating more environmentally sustainable education environments.

Core Facts - Overview: Building better schools: Investing in Scotland's future [DED394](#)

- 7.83 The Scottish Government's Core Facts guidance sets out four key measures used to monitor and improve the education infrastructure across Scotland's Local Authorities. These include the Extent of the school estate (size and number of schools), Condition of the school estate (the physical state of buildings), Sufficiency of the school estate (whether capacity meets current and future pupil demand), and the Suitability of the school estate (how well buildings support learning and wider community use). Local authorities collect and submit this data annually to give a consistent appraisal, track progress, and inform decisions on maintenance, investment, and planning. The aim is to ensure schools are safe, sustainable, inclusive, fit for modern education, and an asset to their communities, while supporting continuous improvement in the estate.
- 7.84 Dundee City Council Education Department follows the Scottish Government's Core Facts when publishing capacity and condition figures, and influences capital spending within the education estate.

Dundee Education Infrastructure

- 7.85 Infrastructure is a critical element of Dundee City education system. The LDP review process must consider the current quality, capacity and needs within education, allowing the council to take an 'infrastructure first' approach to education.
- 7.86 There are ongoing improvements and adaptations to education infrastructure across Dundee. Including a new build programme; refurbishments; planned maintenance works; cyclical upgrades; and an ongoing programme of general works.
- 7.87 A Review of the Service Estate was provided at Dundee City Council Children, Families and Communities Committee on the 20th of January 2025 ([DED080](#)). This report provided an overview of the condition, suitability, and capacity of the learning estate, in line with Scottish Government guidance. The annual review sets out the condition and suitability of education infrastructure and assigns a rating based on these assessments.

Dundee City Council Education Estate Condition & Capital Works Programme

- 7.88 The condition and suitability of school buildings are reviewed each year, and ratings are provided on a scale from A (good) to D (bad) in line with Scottish Government guidelines ([DED080](#)).
- 7.89 Nurseries: All standalone nurseries are rated either A (good) or B (satisfactory) for both condition and suitability.
- 7.90 Primary Schools: Twenty-seven primary schools are rated A or B for condition, and thirty-two primary schools are rated A or B for suitability. Six schools were rated C for condition (Barnhill, Blackness, Craigiebarns, Eastern, St Mary's RC and St Pius' RC) and one was rated C for suitability, St Peter and Paul RC Primary School.
- 7.91 Secondary Schools: All but two Dundee Secondary Schools are rated A or B for both condition and suitability. Braeview and Craigie are the only secondary schools with a C rating; both have been replaced by the new East End Community Campus, in August 2025.
- 7.92 Special Schools: Kingspark School and Rockwell Learning Centre are rated A and B respectively for both condition and suitability.
- 7.93 The Capital Works Programme has invested £3.55m across the learning estate for general upgrading works in 2024/2025 with a further proposed investment of £2.1m in 2025/2026.
- 7.94 Barnhill, Blackness, Craigiebarns, Eastern, and St Mary's primary schools are currently rated C for condition. In the current financial year, approximately £825,000 is being invested in an improvement programme for these schools, including window and roof replacements, toilet refurbishments, and upgrades to electrical, storage, and access facilities.
- 7.95 St Pius' RC also rated C for condition, prompting a significant investment of approximately £145,000 for roof repairs. It is anticipated that the building's age and condition will require continued financial commitments for future maintenance.

Dundee City Council Education Estate Capacity

- 7.96 Dundee City Council determines capacity for each school using the Strathclyde Model, ensuring a consistent approach across the estate.
- 7.97 Primary Schools: The total planning capacity across the primary estate is 13,261, with 9,926 spaces currently occupied, resulting in an occupancy level of 75%. Eight Primary Schools were recorded to have occupancy levels at 95% or above and one has an occupancy level below 50%. Dundee City Council has 3,335 Primary School Spaces available.
- 7.98 Secondary Schools: The total capacity across the secondary estate is 9,716, with 8,437 spaces currently occupied, resulting in an occupancy level of 87%. Two Secondary schools currently have occupancy rates above 95%, St John's RC High School (101%) and Grove Academy (99%). Dundee City Council has 1,279 Secondary School Spaces available.
- 7.99 Special Schools: The total capacity across Dundee's special school estate is 223 places across the cities two schools, with 208 spaces currently occupied. Kingspark School currently has an occupancy rate of 103% and Rockwell Learning Centre has an occupancy rate of 59%.
- 7.100 Four schools across the Dundee's learning estate have an occupancy level exceeding 100%, (St John's RC High School, Kingspark School, Rosebank and Ss Peter and Paul RC). These schools are currently utilising flexible facilities to address the specific demands and overall occupancy levels. Four additional modular classrooms have been completed at the beginning of 2025 at St John's Roman Catholic High School, increasing capacity.
- 7.101 The use of flexible facilities is initially adopted by Dundee Schools to continue to meet the needs of varying class compositions, individual pupils, and changing occupancy levels. The temporary use of flexible facilities allows Dundee's education department to ascertain whether the capacity increase is required permanently.

Dundee City Council Education Capacity Projections:

- 7.102 Dundee City Council education capacity projections are not published publicly; however, they are monitored and influence capital spending. The National Records of Scotland Subnational Population Projections (DED395) project that primary school aged population of Dundee (Ages 5-11) will decline by 8% over the next 5 years. With Dundee's secondary aged population (approximated as 12-16 olds + half of 17) is projected to decline by 5% over the same period.
- 7.103 The ongoing investment in improving the condition and suitability of school buildings, as well as the careful management of school capacity, ensures that the learning estate continues to meet the needs of students. The council's education estate strategy for existing schools and associated infrastructure supports an 'infrastructure first' approach as outlined by NPF4 policy 18 and the Scottish Governments infrastructure investment hierarchy.
- 7.104 Overall, the quality and condition of Dundee's education infrastructure is good. Dundee City has ongoing capital investment addressing areas of concern, and a clear infrastructure-first approach in line with national policy. The key challenges lie in maintaining older primary schools, addressing over-capacity issues when it occurs, and delivering major projects such as the East End Community Campus to ensure long-term resilience and suitability across the learning estate.

Western Gateway Primary School and Nursery Classes

- 7.105 A report (21-2023) for the "Proposed Western Gateway Primary School with Nursery Class and Ardler Primary School catchment change - outcome of the formal consultation process" ([DED371](#)) was presented to Dundee City Council's Children & Families Services Committee (23/01/23). The report presented the formal consultation outcome under the Schools (Consultation) (Scotland) Act 2010, for a proposal to establish a new primary school with a nursery class in the Western Gateway. The report incorporated both the council's consultation findings and the independent assessment by Education Scotland ([DED370](#)).
- 7.106 The recommendation made by Committee was to approve the establishment of the new Western Gateway primary school with nursery class. The financial projection estimates the capital cost of the new school to be approximately £21.8M (reflected within the Council's Capital Plan 2023-2028).

7.107 It was concluded that the school's development is key in meeting educational needs because of projected housing growth in the Western Gateway and called for progression to the next phase of planning and delivery.

Infrastructure Levy for Scotland [DED165](#)

7.108 Scottish Government were in the process of developing an additional Infrastructure Levy. The Planning (Scotland) Act 2019 ("the 2019 Act") provides powers for the Scottish Ministers to make regulations to introduce an Infrastructure Levy, which is a charge payable to a local authority on development within an authority's control, to be spent on the provision of infrastructure.

7.109 This is intended to provide an additional stream of funding for infrastructure which is needed to support growth on a wider scale than individual developments. The Programme for Government 2023-24 committed to implementing new infrastructure levy regulations by Spring 2026 – in advance of the next Scottish Parliament election.

7.110 After the stakeholder engagement during summer 2024 the Minister for Public Finance announced that work on introducing the Infrastructure Levy would cease. Rather the Scottish Government will focus on enhancing existing mechanisms for securing developer contributions, particularly section 75 planning obligations ([DED373](#)).

NPF4, Major Development and Infrastructure [DED091](#)

7.111 Within NPF4 it is detailed that the regeneration of the Dundee Waterfront has demonstrated the potential to make sustainable use of urban coasts. NPF4 also outlines, Dundee is making progress to repurpose disused sites, including the development of a new innovation park on the former Michelin site. NPF4 further details the Eden project as an upcoming key project within Dundee. The Eden project recently received planning permission on the site of the former Dundee gas works. The Eden Project demonstrates an Infrastructure First approach utilising an existing infrastructure within a brown field site and improving opportunities for access and connectivity to the east of Dundee to the city centre.

Beyond 2030 National Blueprint [DED114](#)

7.112 The National Energy System Operator (NESO) report details the national blueprint for developing an electricity system to achieve full decarbonisation by 2035. It builds on the 2022 *Pathway to 2030* Holistic Network Design (HND), to accommodate a capacity from the Scottish wind farms, helping Britain reach a total of 86 GW of offshore wind capacity by 2035.

7.113 The report responds to increasing electricity demand, which forecasts a grow of 64% by 2035—driven by electrification of heat, transport, and industry, outlining the need for a once-in-a-generation expansion of the grid. A proposed high capacity "electrical spine" will connect the north of Scotland to the northwest of England, supported by upgraded onshore circuits. The strategy promotes a holistic and flexible energy system, locating large energy users (such as hydrogen electrolyzers or data centres) near areas of high generation to reduce the need for costly new infrastructure.

SSEN Networks Maps [DED357](#)

7.114 The SSEN maps show the locations of grid supply points and substations in Scotland with indications of the network's capability and potential opportunities to connect to the network. The Milton of Craigie Substation is classified as constrained meaning that the network does not have the capacity to transport electricity required or produced from a new connection.

7.115 SSEN Transmission are developing proposals to replace and upgrade Dundee's high voltage electricity network. They are embarking on a major new substation development at Stannergate to reinforce the existing Dundee City 132kV transmission network as a replacement for Dudhope which is approaching the end of its life and to support the electrification of Scotland's railway network.

7.116 Electricity grid constraints may affect land use planning in terms of where housing and other new building development will be allocated, their phasing, and capacity for heat pumps and other zero and low carbon heating installations. Further electricity network evidence is summarised in the Climate Change, Mitigation and Adaptation Topic Paper (DER002).

Dundee Climate Change Risk and Vulnerability Assessment (2024) [DED074](#)

7.117 The assessment sets out how the climate is projected to change locally within the city, future climate hazards and likely associated risks. It identifies 104 climate change risks to the Council as well as some benefits and opportunities (for example, opportunities for active travel from increased temperature). A more comprehensive summary is included within the Climate Change, Mitigation and Adaptation Schedule ([DER002 – 2.8](#)).

7.118 The document highlights the following infrastructure systems at risk,

Water – water infrastructure refers to systems and processes used to manage water within the city and includes the collection, treatment, storage and distribution of water and all associated assets.

Transport – transport infrastructure refers to assets and services which facilitate the movement of people, goods and resources across land, water and air. Within Dundee this includes the city's public transport (buses and trains), key roads within the city such as the A90 and A92, the city's train station and airport as well as the city's port.

Energy - Energy infrastructure is the physical networks and systems that generate, transmit, and distribute energy. For the city of Dundee this would include electricity, gas and oil and associated network components such as pipelines, electricity lines and substations.

Digital - digital infrastructure encompasses the physical components which facilitate the flow of digital products and services, and information and communications. This includes fixed physical assets such as broadband cables and software centres.

Waste – includes the assets and activities related to the management (including collection, treatment and disposal) of various forms of waste, such as solid or non-solid industrial or household waste, as well as contaminated sites.

7.119 The key findings regarding infrastructure are,

- Storms and high winds are of concern to above ground infrastructure assets as strong winds have the potential to cause damage to buildings and infrastructure, from structural damage to falling debris. Wind can impact transport, impacting high-sided vehicles, causing debris to block roads and rail tracks. Risks to transport from storms are scored as high. Overground assets in the energy and digital systems are also at risk of damage from high winds therefore the risks to energy from storms were scored very high in both scenarios.
- Due to warming, risks from low temperatures for all infrastructure sectors will reduce significantly, most being scored as low or medium under a 4°C scenario.
- Drought and water scarcity are both projected to increase in the region however, on the assumption that industry planning and adaptation will take place and prevent severe shortages to public water supplies, the level of risks is scored medium for both 2°C and 4°C scenarios.
- All types of infrastructure are at risk to surface water flooding which can inundate and damage assets. Therefore, this risk is scored as very high for both 2°C and 4°C scenarios. In areas along the coastline where less hard engineered protection exists, the city's infrastructure is at risk of coastal flooding and coastal erosion – this risk is scored high for both scenarios.

Policy 24 - Digital Infrastructure

National Planning Framework 4 [DED201](#)

7.120 NPF4 details that the development of digital infrastructure is fundamental to the growth of liveable places across Scotland. Digital infrastructure is critical to a sustainable and inclusive future.

7.121 Policy 24: recognises the importance to encourage, promote and facilitate the roll out of digital infrastructure across Scotland to unlock the potential of all our places and economies.

- 7.122 Successful outcomes of the policy will support the continued investment and delivery in high quality digital infrastructure. It is outlined that digital infrastructure is key to Scotland's economic future creating a more resilient and innovative commercial environment. Digital infrastructure will enhance connectivity, facilitate more sustainable ways of living, support flexible ways of working, whilst improving access to health and social care.
- 7.123 NPF4 Policy 24 emphasises that Local Development Plans should support the delivery of digital infrastructure, including fixed line and mobile connectivity, particularly in areas with gaps in connectivity and barriers to digital access.

Dundee Local Development Plan 2019 [DED088](#)

- 7.124 Dundee City Council's current [Local Development Plan 2019](#) (LDP) includes Policy 58 Digital Connectivity. The policy looks to integrate digital infrastructure into the existing natural and built environment in a manner that is sensitive to the surrounding area.
- 7.125 Policy 58 encourages developers to explore, in consultation with service providers, opportunities to provide digital infrastructure to new homes and business premises as an integral part of proposed development.

A Changing Nation: How Scotland Will Thrive in a Digital World (2021) [DED002](#)

- 7.126 This document outlines the Scottish Government's strategy to ensure that the country fulfils its potential within an evolving digital world, part of which is proactively delivering and supporting digital infrastructure across Scotland.
- 7.127 The strategy highlights the importance to develop a digital infrastructure that is accessible to all. As our social, civic and commercial services become digitalised, it is imperative to ensure that we do not exclude the least advantaged in our society, through digital exclusion.
- 7.128 It is demonstrated within the report that there is opportunity to capitalise on the digital transformation to create new jobs in industries with long term growth potential, to ensure that the way we work post pandemic is sustainable, and contributes to increased productivity, improved resilience and economic recovery. There is further opportunity to develop public services that are straightforward and accessible to all. Whilst enabling digital capability plays a key role in education establishing a strong, digitally skilled workforce.

Reaching 100% (R100) [DED239](#)

- 7.129 Reaching 100% (R100) is a funding scheme provided by Digital Scotland, that funds the delivery of faster broadband, to premises within Scotland that do not have access to 'superfast' broadband. The scheme intends to create a national infrastructure network, that enables Scotland to capitalise on emerging digital economies and ensuring access to 'superfast' broadband is equal.
- 7.130 Investment has been distributed via direct funding to network operators and a Scottish Broadband Voucher Scheme. As of April 2020, £600m has been invested via the Scottish Government's R100 programme, with 70% of premises connected through R100 contracts being in rural area.

Connected Nations (2023) [DED039](#)

- 7.131 The Connected Nations Scotland Report (2023) details the current provision of digital infrastructure within Scotland including, full-fibre, fixed wireless access and 5G networks. The report found that digital connectivity is significantly improving across Scotland.
- 7.132 Despite improvement, it is noted that there are challenges faced when delivering digital infrastructure within rural areas. Traditional technologies are often found to be either not effective or economically viable within rural areas. As Dundee is broadly considered an urban environment these issues are not prevalent.
- 7.133 The report demonstrates that individual data demands are increasing, at a significant rate. The average monthly data usage, via a fixed network connection is 542 GB per connection, up from 482 GB last year.

7.134 The report has published figures demonstrating the growth of digital infrastructure roll out, however, Ofcom continues to publish quarterly figures within an interactive report which contains more up to date data.

Connected Nations Spring 2025: Interactive Report [DED040](#)

7.135 Ofcom's Connected Nations Spring 2024 Interactive Report demonstrates the quality of digital infrastructure provision within the City of Dundee. The table below demonstrates the urban average coverage across both 4g and 5g mobile networks. When compared to the national and UK averages Dundee has above average levels of coverage for both 5G and Full-Fibre networks.

Location coverage	4G (At Least on MNO)	4G (All MNO)	5G (At least one MNO)	5G (All MNO)
UK (Urban)	100%	98%	96%	32%
Scotland (Urban)	100%	98%	96%	36%
Dundee	100%	100%	100%	64%
Aberdeen	100%	97%	98%	39%
Edinburgh	100%	98%	99%	69%

Figure 7.9 : Connected Nations, Spring 2025 (mobile coverage) (DED040)

7.136 The table below shows the percentage of coverage of Dundee's fixed broadband speeds. When compared to the national average Dundee's fixed broadband speeds are higher. This is more significant when comparing higher speed connections gigabit capability and full fibre connections.

Speed	Dundee	Scotland
<10 Mbit/s	0%	2%
>= 10 Mbit/s	100%	98%
>= 30 Mbit/s	99%	96%
>= 100 Mbit/s	96%	78%
>= 300 Mbit/s	96%	78%
Gigabit Capable	95%	78%
Full Fibre	83%	65%

Figure 7.10 : Connected Nations, Spring 2025 (fixed broadband coverage) (DED040)

Tay Cities Region Economic Strategy 2019-2039 [DED283](#)

7.137 A key theme of the strategy is digital connectivity. Dundee's current levels of connectivity have been highlighted as a current strength. The plan details that local authorities should keep pace with evolving technologies, in terms of investment, skills and capacity.

Scottish 4G Infill Programme [DED265](#)

7.138 The Scottish 4G Infill Programme looks to support the delivery of the 4G LTE networks across Scotland in locations where there is no existing 4G LTE coverage. As there is full 4G LTE coverage (100% All MNO) across Dundee this policy paper is not relevant.

Shared Rural Network [DED348](#)

7.139 The Shared Rural Network (SRN) is a UK government strategy to provide 4G coverage to 95% of the UK landmass by the end of 2025. The SRN includes a joint investment by EE, O2, Three and Vodafone, which guarantees coverage to 280,000 premises and 16,000km of roads across rural parts of the UK. This strategy

is not relevant to Dundee due to existing full 4G LTE coverage (100% All MNO) and that Dundee is an urban authority.

Summary of the quality of digital infrastructure in Dundee

- 7.140 Dundee as a local authority has one of the strongest digital infrastructure systems in Scotland, with provision that exceeds both national and UK urban averages. The city benefits from 100% 4G and 5G coverage from at least one operator, with 64% 5G coverage by all operators well above national benchmarks.
- 7.141 Fixed broadband provision is equally robust. 99% of premises have access to superfast broadband (≥ 30 Mbit/s), while 96% can access ultrafast speeds (≥ 100 Mbit/s) significantly outperforming the Scottish averages (96% and 78% respectively).
- 7.142 Overall, Dundee's digital infrastructure is of high quality and in good condition, providing comprehensive connectivity that supports residents, businesses, and public services. Its strong mobile and broadband coverage underpins the city's economic competitiveness and positions it as one of the best-connected urban areas in Scotland.

Policy 32: Aquaculture

National Planning Framework 4 [DED201](#)

- 7.143 The National Planning Framework Policy 32. Aquaculture intends to "encourage, promote and facilitate aquaculture development and minimise any adverse effects on the environment, including cumulative impacts. Planning should support an aquaculture industry that is sustainable, diverse, competitive, economically viable and which contributes to food security, whilst operating with social licence, within environmental limits and which ensures there is a thriving marine ecosystem for future generations."

Local Development Plan 2019 [DED088](#)

- 7.144 LDP 2019 does not contain a policy that directly relates to Policy 32, Aquaculture.

Marine Scotland Planning & Location Guidelines, and National Marine Plan (Map) [DED194](#)

- 7.145 The National Marine Plan demonstrates that Dundee is not designated as a location for marine fish farms as of April 2024. The Marine Scotland Planning & Location Guidelines are not relevant to the proposed plan as there are no finfish farms located within or close to Dundee City.

Finfish Aquaculture Sector Plan (SEPA) [DED121](#)

- 7.146 The Finfish Aquaculture Sector Plan looks to protect and improve the environment in a way that benefits health and wellbeing, whilst creating sustainable economic growth.

Shellfish Water Protected Area [DED349](#)

- 7.147 The GIS data is not relevant to the proposed plan as there are no Shellfish waters protected within or close to the Dundee City.

Scottish Coastal Observatory Data [DED260](#)

- 7.148 The Scottish Coastal Observatory Data are not currently relevant to the proposed plan.

Policy 33: Minerals

National Planning Framework 4 [DED201](#)

7.149 NPF4 Policy 33 supports the sustainable management of resources and minimise the impacts of the extraction of minerals on communities and the environment. NPF4 details that LDPs should “support a landbank of construction aggregates of at least 10-years at all times in the relevant market areas, whilst promoting sustainable resource management, safeguarding important workable mineral resources, which are of economic or conservation value, and take steps to ensure these are not sterilised by other types of development.”

Local Development Plan 2019 [DED088](#)

7.150 LDP 2019 does not contain a policy that directly relates to Policy 33, Minerals.

Dundee Minerals and Quarries

7.151 Although Dundee has in the region of fifty inactive quarries, either abandoned, filled or partially filled it has no current active quarries. The Breedon Ethiebeaton Quarry is located in close proximity to the boundary of Dundee.

Aggregate Minerals Survey 2019 [DED013](#)

7.152 The Scottish Aggregate Mineral Survey collects data on the national and regional sales, inter-regional flows, transportation, consumption and permitted reserves of primary aggregates. Producing information that is primarily used by Government, Planning Authorities, industry and environmental interest groups. The data produced informs the development of minerals policy in respect to the production, movement and consumption of aggregates.

7.153 Dundee City Council forms part of the Tay Area market region, along with Perth & Kinross Council and Angus Council.

7.154 As of 2019 the Tay Area had an estimated 2,650,000 tonnes of primary aggregate reserves resulting in a 9-year maximum supply, at 2019 sales levels (Table 15a). This figure does not meet the demands of policy 33.

Summary of Stakeholder Engagement

The Infrastructure First and Local Living Evidence Report (DER003) was published for consultation between the 12th September 2024 to 24th October 2024 and has formed the basis for the ‘Summary of Evidence’. The following table summarises the comments received along with the Dundee City Council (DCC) response.

Respondent	Summary of Comments and DCC Response
Private Individual – (STA001)	Agreed with the summary of evidence, however, disagreed with the sufficiency of evidence provided or the implications for the proposed plan. DCC Response: An email was sent on 13/01/2025 to offer the opportunity to submit or suggest further evidence to be included within the Evidence Report.
Private Individual – (STA036)	Agreed with the summary of evidence, the sufficiency of evidence provided and the implications for the proposed plan.
Private Individual - (STA033)	Disagreed with the level of evidence provided, the summary of evidence and the implications for the proposed plan.

		This community member noted they were not in agreement with the evidence list, or the summary of the evidence included and formally disputed the evidence report. DCC Response: An initial email was sent on 12/05/2025 to offer the opportunity to submit or suggest further evidence to be included within the Evidence Report. A further email was sent to confirm whether a formal dispute was clicked in error. Neither email were responded to.	
	Nature Scot - (STA032)	Nature Scotland agreed with the sufficiency with the evidence identified, the summary of evidence included, however disagreed with the implications for the proposed plan. It was noted within their response that they believed that the Scottish Government's Designing Streets document should be included, and that details should be included to cover, Sustainable Transport Hierarchy and increase cross boundary transport opportunities. DCC Response: The Designing Streets document has been included, and further information regarding the Sustainable Transport Hierarchy and increase cross boundary transport opportunities have been included within the Sustainable Transport Evidence Report.	
	Historic Environment Scotland - (STA004)	Agreed with the summary of evidence, the sufficiency of evidence provided and the implications for the proposed plan.	
	SSEN Transmission - (STA029)	Agreed with the summary of evidence and the implications for the proposed plan, however, disagreed with the sufficiency of evidence provided. SSEN Transmission suggested the inclusion of evidence covering the proposed development of Stannergate Substation. DCC Response: This evidence has been included within Sustainable Transport Evidence Report.	
	Taylor Wimpey - (STA050)	Agreed with the summary of evidence and the sufficiency of evidence provided, however, did disagreed with the implications for the proposed plan. Taylor Wimpey acknowledges that most of the city region is urban and generally suitable for implementing the 20-minute neighbourhood model. However, it emphasises the need for flexibility when applying this principle to new greenfield residential developments. In such cases, local context and broader social, economic, and environmental benefits should guide decision-making. It also notes that larger-scale developments, including expansions of existing sites, could potentially create new 20-minute neighbourhoods by integrating a mix of land uses, aligning with the goals of National Planning Framework 4 (NPF4).	

		DCC Response: The issue raised regarding the Proposed Plan's implications largely falls outside the scope of the Evidence Report stage. However, the wording was revised to reflect feedback received on the need for greater flexibility.	
	Homes for Scotland - (STA047)	Homes for Scotland (HFS) agreed with the summary of evidence included, however disagreed with the implications for the proposed plan and the sufficiency of the evidence identified. The following data/evidence was proposed by HFS - Existing Housing Need in Dundee (Homes for Scotland report). - Scotland's SME Home Builders 2024 (Homes for Scotland report). - Measuring Use of Health Services by Equality Group (2017), NHS National Services Scotland. - 2018-based Population Projections by Council Area in Scotland, (2018) National Records for Scotland. Homes for Scotland detailed in response to the implications for the proposed plan that local living principles should be applied flexibly. Further comments were also made in response to education and the development of supplementary guidance did not meet the requirements for the evidence report stage. DCC Response: The <i>Existing Housing Need in Dundee</i> and <i>Scotland's SME Home Builders 2024</i> reports were added to the "Quality Homes and Site Assessment Methodology" topic paper. The National Records of Scotland population projections are included within the "Health and Safety" topic paper. The 2017 NHS report was reviewed but deemed not to have planning or infrastructure implications and therefore was not included. The issue raised in response to the implications for the Proposed Plan is broadly outwith the scope of the Evidence Report stage. Wording was changed in recognition of comments received regarding the matter of flexibility. Comments about education infrastructure were formally acknowledged and clarified with confirmation from education colleagues in Dundee City Council. Confirmation was provided that Homes for Scotland do not formally dispute the evidence base for the Infrastructure First and Local Living topic paper. As the review of the LDP progresses the Council will have a Call for Ideas stage as well as consultation on Proposed Plan which will provide further opportunity for comment.	

Kirkwood Homes Ltd - (STA016)	Kirkwood Homes agreed with the summary of evidence included, however disagreed with the implications for the proposed plan and the sufficiency of the evidence identified. The comments submitted by Hallam Land largely mirror those made by Homes for Scotland, with only minor wording differences.
Scottish Water - (STA003)	Agreed with the summary of evidence, the sufficiency of evidence provided and the implications for the proposed plan.
Hallam Land - (STA024)	Hallam Land agreed with the summary of evidence included, however disagreed with the implications for the proposed plan and the sufficiency of the evidence identified. Hallam Land did not specifically state what information should be provided. They did suggest within this section that the topic of Local Living and 20-minute neighbourhoods should be separated into its own dedicated topic paper, as it lacks clear overlap with other policy areas like Infrastructure First, Digital Infrastructure, aquaculture, and Minerals. This would align with how other councils in Scotland structure their Local development Plans (LDPs). Second, it argues that the release of the current topic paper is premature. The paper should ideally be revised and reissued after the publication of the Dundee Liveable Neighbourhoods Strategy, which is expected to provide more detailed local data on settlement patterns and challenges across the city's eight wards. Without this data, the current topic paper lacks sufficient evidence to support its conclusions. Hallam Land expressed concern over the rigid application of local living principles for determining housing site allocations, arguing that such an approach is overly prescriptive and inconsistent with both the topic paper's own call for flexibility and national policy guidance. Emphasising that the principles of Local Living and 20-minute neighbourhoods should be applied in a tailored manner, recognising the diverse nature of communities and the practical limitations in achieving ideal conditions, especially in peri-urban and rural areas. They also call for clarity on whether Dundee and Angus Councils will adopt a coordinated approach to implementing these principles, particularly for developments near their shared borders. DCC Response: The concerns raised regarding the implications for the proposed plan largely fall outside the scope of the Evidence Report stage. However, the wording was amended to reflect feedback received on the need for greater flexibility.
SEPA - (STA002)	SEPA provided an email response to the consultation request. The email detailed that while the evidence report refers to various types of infrastructure as defined in the NPF4 Glossary, the evidence presented only covers some of them. It suggests that if evidence for other infrastructure types is addressed in separate topic papers, these should

		be clearly cross-referenced. Emphasizing the importance of an integrated approach to infrastructure planning, as outlined in NPF4 Policy 18, the response stresses the need to consider all infrastructure types—such as their capacity, condition, and needs—within the broader context of place. Without this comprehensive view, it's difficult to fully understand the implications for the plan. For example, blue and green infrastructure can support water management and active travel, demonstrating the interconnected nature of infrastructure systems. DCC Response: Agreed that cross referencing evidence related to infrastructure types would help to meet the requirements of NPF4 Policy 18. Clarified which topic papers in the Evidence Report referenced each infrastructure type outlined within the definition of 'Infrastructure First' within the NPF4 glossary.	
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Summary of Implications for the Proposed Plan

Policy 15- Local Living and 20 minute neighbourhoods

7.155 Incorporating the 20 Minute Neighbourhood concept into the forthcoming Local Development Plan is a key priority set out in the Dundee City Council Plan 2022-2027. It is recognised that a largely urban area like Dundee already has many of the components required to deliver the principles of local living. However, effective implementation can only be achieved by having a robust understanding of the diverse nature of neighbourhoods. The approach to local living is a culmination of a range of policy areas and planners cannot achieve this in isolation. It requires buy-in from stakeholders such as health care providers, education services, developers and housebuilders, local people, and community groups.

7.156 It is recognised that delivering the key elements of Local Living will pose several challenges, including funding and resourcing of services and facilities. Placemaking will play a fundamental role in delivering this aspiration whether through individual planning applications or wider masterplans. Embedding the principles of local living within masterplans allows essential facilities like shops, community facilities and schools to be provided from the outset and delivered at the development management stage. Development which makes efficient use of land including achieving appropriate densities should be supported. Large housing developments in areas which do not have easy access to employment, schools, goods and services will not be supported unless these facilities are delivered. Provision for community facilities should be considered according to local need as evidenced through community engagement and assessed against existing provision in areas where there is no, limited or inaccessible provision.

7.157 In the preparation of the Proposed Plan, we will:

- Consider key design principles and/or development briefs on key sites to support a tailored approach.
- Consider future masterplan requirements for longer term growth areas.
- Consider place-based opportunities for new development sites and incorporate outcomes from other strategies and evidence to support the Local Living principle. This should include early engagement with communities and key stakeholders.
- Consider restricting further drive-through development where non-conducive to local living principles (i.e. inaccessible within a 10-minute walk or cycle).

7.158 Data is crucial for decisions about carrying forward previous allocations from preceding LDPs. In developing the spatial strategy and identifying housing land allocations, the planning authority will identify and assess concentrations of existing and proposed services/facilities in collaboration with key stakeholders, including key agencies, communities, landowners, and developers.

7.159 Given Dundee's diverse neighbourhoods, delivering local living principles requires a balanced approach that considers the unique characteristics of proposed development sites. Sustainable transport options are necessary to ensure connectivity and reduce reliance on private cars.

- 7.160 In the event where the only suitable sites are out with sufficient walking distances, but within sufficient cycling distances, there may be a requirement to secure contributions towards cycling infrastructure accordingly between new residential development and the facilities at hand. The Design of New Housing standards set out in Appendix 4 and Policy 10 of the current LDP may require to be revised to ensure that new housing contributes to creating liveable places.
- 7.161 There are many connections between this policy theme and other evidence. For example, delivering walkable neighbourhoods with integrated blue and green infrastructure will help to reduce car travel contributing to the climate and nature crises. Community wealth building implications are set out further in the Design, Quality and Place topic paper. There are key linkages between keeping wealth within communities and promoting local businesses and services within walking distance of homes.
- 7.162 The LDP will include statements of the planning authority's policies and proposals as to the provision of public conveniences and water refill locations. These will take into consideration that public conveniences and water refill locations are a vital facility, both for local people (especially for women, families, disabled people and older people) and visitors to an area. The approach in the spatial strategy to public convenience and water refill provision could usefully align with wider policies relating to local living and town centres.
- 7.163 In conclusion, the strategy for promoting local living in Dundee will involve aligning various policy areas to work cohesively across the city's diverse neighbourhoods. By concentrating on the integration of policies such as improving infrastructure, encouraging mixed-use developments, incorporating green spaces, enhancing public transportation, and strengthening community involvement, Dundee can effectively achieve the objectives set out in NPF4.

Policy 18 – Infrastructure First

- 7.164 NPF4 supports development that encourages the facilitation and early adoption of infrastructure within placemaking. This approach intends to improve the quality and accessibility of infrastructure by responding to the needs of a place and its communities.
- 7.165 Infrastructure matters have been reviewed across a range of Schedules within the Evidence Report. Within the Local Living and Infrastructure First Schedule, education and digital infrastructure has been reviewed.
- 7.166 Dundee's Proposed LDP should support place-based infrastructure investment and delivery. By prioritising an infrastructure first approach. The Proposed Plan will be constructed upon a robust evidence base, which includes infrastructure capacity and condition. Allowing for infrastructure considerations to be considered within site allocations stage. Rather than delivering subsequent infrastructure, that responds to predetermined sites. Where possible appropriate infrastructure needs should be identified with development proposals, outlining the current infrastructure conditions and capacity, and how and by whom infrastructure development will be delivered by if required.
- 7.167 Infrastructure capacity data will be used to inform the sequencing of development in the Delivery Programme. The Council will work with key agencies to align investment plans and ensure infrastructure-first principles are embedded in site delivery.
- 7.168 Through an Infrastructure First' approach the Proposed Plan should support development proposals that consider existing infrastructure constraints and needs, plan future development accordingly, and identify key infrastructure opportunities within the development.
- 7.169 Developer contributions are being considered and where it is appropriate, it is necessary to detail the type of infrastructure, its location and level that developer contributions will be considered. Where it is required, sites should be safeguarded for critical infrastructure within the Proposed Plan.
- 7.170 The Council currently seeks developer contributions for education in areas experiencing growth in student pupil population (primary & secondary). The contributions received safeguard that new housing developments do not place undue pressure on existing school infrastructure and that adequate educational facilities are available to support growing communities.
- 7.171 It is considered that Dundee's education infrastructure is, overall, in good condition and is currently meeting demand in terms of capacity. Where elements of infrastructure are not adequate, they are either being replaced or repaired, and in situations where capacity is temporarily insufficient, flexible infrastructure is being utilised. Should these specific capacity issues persist, the development of permanent infrastructure

would be explored, or the review of school boundaries may be considered to ensure demand continues to be met.

7.172 The current education developer contribution will be reviewed and considered for incorporation into the Proposed Plan stage. Although the general condition and capacity of the Council's school estate is considered good, significant developments and land allocations designated by the LDP could have an effect that exceeds the capacity of the existing infrastructure.

7.173 The Council will continue to review its policy position on developer contributions for specific infrastructure taking account the most up to date evidence on condition, capacity and demand of assets.

Policy 24 - Digital Infrastructure

7.174 Dundee's Digital Infrastructure networks will need to evolve with the growing demand and emerging technologies. As we become more reliant on digital infrastructure whether at home, school or at the workplace it is important that digital infrastructure is of a high standard, accessible and inclusive.

7.175 Dundee is receiving significant investment in both the mobile and fixed broadband networks of the city. Investment has supported the wide-ranging roll out of both full-fibre broadband and 5G networks across Dundee. Despite Dundee having a comprehensive digital infrastructure network, it is critical to continue to encourage developers and service providers to provide digital infrastructure to new homes and business premises as an integral part of the local development plan review.

Policy 32 – Aquaculture

7.176 As detailed within the Schedule the aquaculture industry is not present within Dundee and its surrounding areas. Therefore, this NPF4 policy matter will not be covered within the Proposed Plan.

Policy 33 – Minerals

7.177 As outlined by NPF4 Policy 33, Proposed Plans should support a landbank of construction aggregates of at least 10-years at all times in the relevant market areas, whilst promoting sustainable resource management, safeguarding important workable mineral resources, which are of economic or conservation value.

7.178 The current landbank of primary aggregates is 9-years, as demonstrated by Aggregate Minerals Survey 2019. This falls short of the 10-year landbank that is expected by NPF4 Policy 33.

7.179 As the Tay Area has an insufficient landbank of primary aggregate reserves, dialogue will be required within the Proposed Plan process with both Angus Council and Perth & Kinross Council as well as local operators to identify opportunities to increase consented reserves and secure a sufficient landbank of primary aggregates.

Statements of Agreement / Dispute

Statements of Agreement

7.180 As outlined within the Summary of Stakeholder Engagement, a significant level of engagement was carried out with multiple stakeholders during pre-consultation, consultation, and post-consultation of the topic paper. The following organisations agree with the evidence base presented:

- NatureScot
- Historic Environment Scotland
- Scottish Water

Statements of Dispute

7.181 Throughout the course of the consultation on the Infrastructure First and Local Living topic paper two formal disputes were submitted by Taylor Wimpey (STA050) and Hallam Land (STA043). The Council carefully considered all issues raised and submitted comments back to both organisations to clarify the

position. Neither organisation responded to the Council's subsequent correspondence and so both organisations comments have been progressed to Gate Check stage. The nature of the disputes and the Council's response is set out below.

Taylor Wimpey (STA050)

7.182 Taylor Wimpey's dispute applies to the implications for the Proposed Plan.

Dispute

7.183 Seeking confirmation that in greenfield residential land allocations, the 20-minute neighbourhood principle must be capable of being applied flexibly considering local context.

DCC Response

7.184 In recognition of comments received regarding this matter, Evidence Report wording was revised to clarify that a balanced approach would be taken to delivering local living principles considering the unique characteristics of proposed development sites. The email asked for confirmation if amendments were sufficient for removal of the dispute with a deadline of 23rd May 2025. No response was received so dispute carried forward.

Hallam Land (STA043)

7.185 Hallam Land's dispute applies to the sufficiency of the evidence list to inform the Proposed Plan as well as the implications for the Proposed Plan.

7.186 Each aspect is addressed individually as follows:

Evidence/Dataset Sufficiency

Dispute

7.187 Local Living and 20-minute neighbourhoods topic should be split into its own topic paper as no obvious overlap with Infrastructure First.

7.188 Requested that Liveable Neighbourhoods Strategy should have been released prior to topic paper consultation to provide data required to substantiate implications for Proposed Plan.

DCC Response

7.189 The decision was made to group NPF4 Policies 15, 18 and 24 due to their overlapping evidence requirements to achieve the objectives in Dundee. Ensuring infrastructure is in place first supports the creation of well-connected 20-minute neighbourhoods with access to essential services. Highlighted that NPF4 should be considered with policies interconnecting and supporting each other.

7.190 Comments on the Liveable Neighbourhoods data tool are noted. The Improvement Service have subsequently published guidance on mapping 20-minute neighbourhoods and Dundee City Council are following this approach in collaboration with other services and organisations. The network analysis outputs from this data tool will inform the Proposed Plan. The datasets contributing to the tool are listed in the topic paper and many of these are available for public download.

Proposed Plan Implications

Dispute

7.191 Disagreed that decisions to carry forward allocations be based on a metric of whether sites are within a 10-minute walk or cycle distance of core facilities and that housing developments will not be supported in areas without easy access to employment, schools, good and services and unless these facilities are delivered. Stated that a prescriptive approach is contrary to national policy guidance on Local Living and 20 minute neighbourhoods. Considered that the summary of evidence neglects other sustainable modes of transport such as public transport and private electric/hybrid vehicles. Requested clarification on whether the Council has agreed aligned approach with Angus Council in the application of Local Living particularly for sites at cross-border locations.

DCC Response

7.192 In recognition of comments received regarding this matter, the Evidence Report wording was revised to clarify that a balanced approach would be taken to delivering local living principles considering the unique characteristics of proposed development sites. Clarified that the planning authority is engaging with regional local authorities on policy matters in line with the Scottish Government's Local Development Planning Guidance. The Council sought confirmation that these amendments were sufficient for removal of the dispute and as no response was received the dispute was carried forward.

Sustainable Transport (008)

Issue: Topic / Place	Sustainable Transport (DER008)
Information required by the Act regarding the issue addressed in this section	Policy 13: Sustainable Transport Section 15(5) • the infrastructure of the district (including transport systems); and • how that infrastructure is used. Regulation 9 Have regard to: • any regional transport strategy; and • any local transport strategy.
Links to Evidence	Policy 13: Sustainable Transport • Development Planning and Management Transport Appraisal Guidance (DED055) • Scottish Transport Appraisal Guidance (DED267) • Land use and Transport Integrations in Scotland (LATIS) Transport Scotland (DED172) • Hands Up Survey Scotland - How Dundee's school pupils travel to school Dundee City Council (DED142) • NHS Tayside: Director of Public Health Annual Report 2023 (DED215) • Transport poverty: a public health issue (DED215) • Unemployment rate within the city Dundee City Council (DED298) • Overcoming deprivation and disconnection in UK cities Joseph Rowntree Foundation (DED222) • The Trunk Road Network Transport Scotland (DED291) • Transport Scotland, Scottish Transport Statistics 2023 (DED268) • Scottish trunk road network map Transport Scotland (DED269) • Scotland's Road Safety Framework to 2030 (DED264) • Annual Road Safety Report and 20mph Progress Report (DED019) • Dundee Sustainable Transport Development Plan 2024-2034 (DED102) • Overnight Lorry Parking (DED223) • Secured European Truck Parking - Best Practice Handbook (DED276) • School Streets Dundee City Council (DED252) • Frequently Asked Questions regarding the School Streets Scheme (DED126) • Bus Taskforce Summary Report (DED025) • Young Persons' Free Bus Travel Scheme - Year 1 Evaluation (DED308) • Dundee Taxi Fare Card 2024 (DED103) • Dundee City Council - Taxi Demand Study (2024) (DED068) • Taxis and Private Hire Cars Dundee City Council (DED282) • Dundee Core Paths Plan (DED043) • Dundee Walking and Cycling Index 2023 (DED104) • Cycling Scotland Resources (DED047) • Outdoor Access in Dundee (DED221) • Tayside Aviation Limited - Administration (DED288) • Tay Cities Region Deal: Deal Document 2020 (DED284) • Tayside and Central Scotland Regional Transport Strategy 2024 (DED287) • National Planning Framework 4 (DED201) • Local Development Plan 2019 (DED088)

	• National Transport Strategy 2 (DED204) • Strategic Transport Projects Review (STPR2) (DED274) • A Long-Term Vision for Active Travel in Scotland 2030 (DED006) • Active Travel Framework, 2019 (DED011) • Let's Get Scotland Walking: The National Walking Strategy, 2014 (DED176) • Cycling Framework for Active Travel - A Plan for Everyday Cycling, 2023 (DED046) • Cycling by Design Update (2021) (DED045) • Hydrogen Action Plan (DED162) • Switched On Scotland Phase Two: An Action Plan for Growth, 2017 (DED280) • Road Standards: Dundee Streets Ahead (Dundee City Council) (DED250) • Dundee Cycling Strategy 2019 (DED078) • Dundee Climate Action Plan (2019) (DED073) • Equality, opportunity, community: New leadership – A fresh start (DED113) • Update to the Climate Change Plan, Scottish Government (2018 - 2032) (DED300) • Reducing car use for a healthier, fairer and greener Scotland (DED244) • Sustainable Travel to Stations Strategy (DED346) • Active Travel Projects Dundee City Council (DED012) • Scotland CP7 Strategic Business Plan (DED253) • Network Rail's Stannergate Substation and Feeder Station (DED212) • STPR2 Summary Report (DED358) • Regional Transport - Main Issues Report (DED359) • Road traffic statistics - Local authority: Dundee City • Reported Road Casualties Scotland 2022 - publication - excel version of the tables.xlsx • Scotland's Census 2022 (DED367) • Designing Streets: A Policy Statement for Scotland (DED369) • Department for Transport - Statistics DED374 • UK maritime statistics DED377 • UK local authority and regional greenhouse gas emissions statistics DED379 • SIMD 2020 - Local Authority Analysis DED380
Upcoming Expected Evidence	• Tactran are currently undertaking a multi-modal transport study of the Perth-Montrose transport corridor and expected to publish a detailed options appraisal. • Dundee City Council's Streets Ahead (2025)
Policy Introduction	
8.1 Located on the East coast of Scotland, Dundee serves as the primary centre for the region, providing employment, further education, healthcare, leisure, retail, and recreational services for the surrounding region. 8.2 Transport Infrastructure is critical to the development of an effective and well-functioning city, that promotes social well-being and economic prosperity. The delivery of high-quality transport systems is complex and requires the adequate provision of infrastructure. When designing and delivering transport infrastructure it is key that these works respond to the needs of the communities they are serving, following an infrastructure first approach. 8.3 Dundee is accessible by road, rail and air. The main road that connects Edinburgh to Aberdeen (A90) passes through the city and is connected by the Tay Road Bridge (A92) to North-East Fife. Scottish City Link, Ember, Flixbus and Stagecoach operate bus services between Dundee and Perth, Edinburgh, Glasgow, Aberdeen, Fife and other destinations.	

- 8.4 Dundee Railway station supports more than 1.4 million passengers per year, with regular direct train services to Edinburgh, Glasgow, Aberdeen and London Kings Cross. Dundee is also served by the Caledonian Sleeper train which provides overnight rail services Sunday to Friday from Aberdeen to London.
- 8.5 Dundee's transport systems have evolved with the further built environment. Since the publication of "Streets Ahead" in 2005 the city has been advocating a sustainable approach to transport planning which considers the needs of moving people and goods by all modes of transport, a change from the historical focus on "Roads" standards. The 2019 Local Development Plan built upon this by promoting safe and sustainable transportation development.
- 8.6 In 2019, 49% of all commuters in Dundee commuted by private motor vehicles ([DED367](#)). Between 2013 and 2023, the number of children in Dundee traveling to school by private motorised transport has increased, while the percentage using active travel has declined ([DED142](#)). According to the Sustrans Hands Up 2024 survey, 27.2% of children in Dundee are driven to school, exceeding the national average of 22.2% ([DED142](#)).

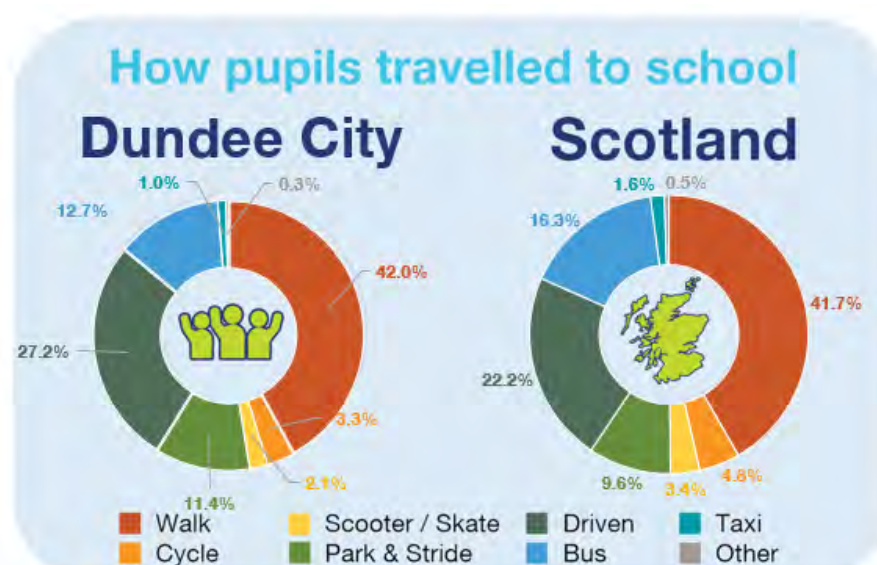


Figure 8.1: Hands Up 2024 – How Pupils Travelled to School, 2023

Dundee Transport Appraisal

- 8.7 NPF4 Policy 13, Sustainable Transport emphasises that the LDP must be based on comprehensive Transport Appraisals following the upcoming Development Planning and Transport Appraisal Guidance (replacing the current DPMTAG - [DED055](#)) and where appropriate the Scottish Transport Appraisal Guidance (STAG - [DED334](#)). The Transport Appraisal should assess transport infrastructure capacity, evaluate the spatial strategy's impact on transport networks, and mitigation measures. If a proposed LDP strategy is likely to significantly impact local and strategic networks, the cumulative impact should be assessed within the Transport Appraisal. Participation and engagement play a crucial role in the appraisal process. It is essential to consider the interests of stakeholders and those impacted by the change in a manner that is inclusive, open, transparent, and appropriate. Meaningful engagement with Transport Scotland is a vital component of the process, especially regarding any transport interventions and land use allocations.
- 8.8 The Transport Appraisal should identify areas where additional infrastructure may or may not be required for further development. The appraisal will incorporate Tayside and Central Scotland Transport Partnership (TACTRAN) insights, ensuring an alignment with the regional and national priorities. Engagement will continue with Transport Scotland throughout the proposed plan stage, and a determination of the level of Transport Appraisal required will be made in partnership with Transport Scotland. Depending on the scale of the appraisal it may be deemed proportionate to utilise Transport Scotland's, Land Use and Transport Integration in Scotland (LATIS - [DED172](#)) database and modelling.

- 8.9 The Transport Appraisal process ensures the LDP is supported by robust, evidence driven transport planning to meet future demands effectively. After the Site Appraisal Stage of the LDP development an assessment of the proposed sites will be undertaken, informing the level of Transport Appraisal that will be undertaken in line with the DPTAG.
- 8.10 This evidence report will summarise existing transport infrastructure, regional and national transport policy frameworks as well as any proposed transport infrastructure development and relevant policy documentation.

Summary of Evidence

National Planning Framework 4 ([DED201](#))

- 8.11 National Planning Framework 4 (NPF4) policy 13 is intended “To encourage, promote and facilitate developments that prioritise walking, wheeling, cycling and public transport for everyday travel and reduce the need to travel unsustainably.”
- 8.12 Future Local Development Plans (LDPs) should seek to balance both a place-based approach which will assist in reducing car dominance and an infrastructure first approach, particularly avoiding impacts on the trunk road and rail networks. The implementation of other policies could have a less direct impact on transportation matters, in particular:
- Policy 1 – Tackling Climate and Nature crises
 - Policy 2 – Climate mitigation and adaptation
 - Policy 15 – Local Living and 20-minute neighbourhoods
 - Policy 16 – Quality Homes
 - Policy 18 – Infrastructure First
- 8.13 These policies will be considered in much greater depth by other parts of the Local Development Plan preparation process. Only those elements with direct impact on transportation have been assessed in the preparation of this evidence report.

Local Development Plan 2019 ([DED088](#))

- 8.14 The following 2019, LDP policies are relevant policies that are currently responsible to Transport issues,
- 8.15 [Policy 54](#): Safe and Sustainable Transport: requiring that any development proposals that generate travel should be designed to be well served by all modes of transport. The sustainable modes of walking, cycling and public transport should be afforded priority and provide for easy access to local amenities, education facilities and other services.
- 8.16 [Policy 55](#): Dundee Airport: seeks to ensure safety protection for air traffic whilst supporting developments associated with the airport operations.
- 8.17 [Policy 56](#): Parking: this provides for cycle parking provision and restricts private non-residential parking provision, within the City Centre. It seeks that any residential parking is provided with electrical charging capabilities. Outwith the City Centre it requires compliance with the Dundee City Council adopted Road Standards document. It also seeks to avoid impact on existing lorry parking facilities.
- 8.18 [Policy 57](#): Transportation Interchanges: This policy seeks to encourage Park & Choose facilities and supports further development of rail infrastructure, road freight facilities and water-based transport.
- 8.19 The LDP policies outlined supports a gradual but clear shift in Dundee’s local authority planning and development priorities toward decarbonisation, active travel, and more equitable access to transport. In preparation of the upcoming LDP these existing policies will need to evolve further to fully align with the ambitions of the existing policy framework.

National Transport Strategy 2 ([DED204](#))

- 8.20 Transport Scotland’s second National Transport Strategy (NTS2) ([DED204](#)) sets out a 20-year vision to address the diverse transport needs of Scotland’s cities, towns, rural areas, and isles. Collaboratively

developed with a wide range of stakeholders across the country. The strategy is structured around four key priorities:

- reducing inequalities by ensuring fair, accessible, and affordable transport services,
- addressing climate change by promoting sustainable travel and low-carbon transport solutions in alignment with Scotland's net-zero emissions target by 2045,
- fostering inclusive economic growth by enhancing the efficiency of transport networks to support employment, education, and business activities,
- and improving public health and well-being by prioritising safety, security, and active travel options.

8.21 A fundamental aspect of NTS2 is the shift in the transport hierarchy, which places walking, wheeling, and cycling at the top, followed by public transport, shared transport, and, lastly, private car use. This approach prioritises more sustainable and inclusive transport options, aiming to reduce car dependency and promote active and public transport as the preferred choices. In addition to the Sustainable Transport Hierarchy is the Sustainable Investment Hierarchy. This investment approach complements the Sustainable Transport Hierarchy through prioritisation of the utilisation and maintenance of existing transport assets before considering infrastructure investment and expansion.



Figure 8.2: Sustainable Transport Hierarchy

8.22 The NTS highlights the importance of a collective effort and shared responsibility in achieving its goals, with an emphasis on sustainable and positive travel choices. The NTS does not contain information that is unique to Dundee, rather it provides a strategic framework to guide future decisions on transport investments. The NTS intends to create a sustainable, inclusive, safe, and accessible transport system that contributes to a healthier, fairer, and more prosperous Scotland for all.

Strategic Transport Projects Review 2 ([DED274](#))

8.23 The Second Strategic Transport Projects Review (STPR2) ([DED274](#)) outlines a 20-year vision (2022–2042) for enhancing Scotland's transport network. There are several key recommendations that are either specific or applicable to Dundee that improve connectivity, promote sustainable travel, and support economic growth.

1. Connected Neighbourhoods (R1):
Advocates for the creation of 20-minute neighbourhoods in Dundee, where residents can access essential services within a short walk or cycle.
2. Active Freeways and Cycle Parking Hubs (R2):
Supports the of dedicated cycling corridors and secure parking facilities in Dundee to encourage cycling as a primary mode of transport for short to medium trips.
3. Expansion of 20mph Limits and Zones (R10):
Recommends implementing wider 20mph speed limits in residential and urban areas of Dundee to enhance safety for pedestrians and cyclists, and to encourage active travel.

4. Perth–Dundee–Aberdeen Rail Corridor Enhancements (R16):
Proposed improvements to rail services between Perth, Dundee, and Aberdeen. Increasing capacity, reliability, and frequency. Aiming to encourage a shift from car to rail travel, supporting decarbonization efforts and enhancing regional connectivity.
5. Edinburgh–Glasgow–Perth–Dundee Rail Corridor Enhancements (R17):
Upgrading rail infrastructure and services connecting Dundee.
6. Smart Integrated Ticketing (R23):
Aims to implement a unified ticketing system across various modes of public transport, simplifying fare structures and making public transport more accessible and user-friendly.
7. Decarbonization Initiatives (R25–28):
Encompasses efforts to decarbonize the transport sector in Dundee, including:
 - Electrification of rail lines serving Dundee.
 - Transitioning the bus fleet to zero-emission vehicles.
 - Promoting the adoption of electric vehicles through infrastructure development.
 - Encouraging modal shifts in freight transport to reduce emissions.
8. Trunk Road and Motorway Network Renewal (R32):
Development of integrated transport plans for the A90 corridor through Dundee.
9. Rail Freight Terminals and Facilities (R44): Facilitating investment in future rail freight terminals, to improve the sustainability and competitiveness of Scotland's supply chain

8.24 These recommendations align with the Scottish Government's broader objectives of reducing car dependency, achieving net-zero emissions, and fostering inclusive economic growth. The STPR2 emphasizes a sustainable investment hierarchy, prioritizing the reduction of travel demand, maintaining existing assets and undertaking targeted infrastructure improvements.

A Long-Term Vision for Active Travel in Scotland 2030, (2014) ([DED006](#))

- 8.25 The Long-Term Vision for Active Travel in Scotland 2030 outlines Scotland's commitment to changing the way we travel. Making walking and cycling the preferred choice for short, everyday journeys. Resulting in improved public health, creating more connected and inclusive communities, and growing access to economic opportunity for all.
- 8.26 A key focus of the plan is to reduce social inequalities by improving access to jobs, services, and leisure activities for everyone, particularly children, older adults, people with disabilities, and low-income groups. Additionally, increasing active travel will help cut carbon emissions and pollution, contributing positively to climate change mitigation, whilst improving air quality.
- 8.27 The plan looks to develop liveable and welcoming communities by making walking and cycling easy, safe, and enjoyable. Enhancing residents' quality of life and fostering stronger community ties. The plan understands that achieving this vision requires collaboration across sectors such as transportation, planning, health, and education to ensure active travel becomes a realistic and desirable choice for everyone in Scotland.

Active Travel Framework, 2019 ([DED011](#))

- 8.28 The Active Travel Framework (ATF) ([DED011](#)) has developed a range of key policy approaches to improve the uptake of walking and cycling in Scotland. It has been produced in collaboration by Transport Scotland and key stakeholders. The plan has a 2030 Vision for Active Travel that "*Scotland's communities are shaped around people, with walking or cycling the most popular choice for shorter everyday journeys*".
- 8.29 The ATF has consolidated these approaches into five Active Travel Strategic Objectives,
1. Cut carbon emissions and other pollution
 2. Delivering liveable, more pleasant communities
 3. Better health and safer travel for all
 4. Reducing inequalities - jobs, services, leisure
 5. Supporting delivery of sustainable economic growth
- 8.30 The five Active Travel Strategic Outcome are,

1. Increase the number of people choosing walking, cycling and wheeling in Scotland
 2. High quality walking, cycling and wheeling infrastructure is available to all
 3. Walking, cycling and wheeling is safer for all
 4. Walking, cycling and wheeling is available to all
 5. Delivery of walking, cycling and wheeling is promoted and supported by a range of partners
- 8.31 The framework incorporates the aims of the National Walking Strategy and the Cycling Action Plan. By focusing on these strategic objectives and monitoring outcome indicators outlined within the report, the framework seeks to create environments where active travel is a safe, practical, and attractive option for all residents.

Let's Get Scotland Walking: The National Walking Strategy, 2014 ([DED011](#))

- 8.32 The National Walking Strategy ([DED011](#)), Let's Get Scotland Walking details Scotland's vision to promote walking as a primary mode of transportation and recreation. The strategy focuses on the benefits of walking, including improvements in health (both physical and mental), environmental and economic. It demonstrates Scotland's unique assets such as green spaces, and urban centres, which provide opportunities for walking.
- 8.33 The strategy aspires to achieve levels of walking on a par with the best performing countries such as the Netherlands, Norway and Switzerland. To achieve this goal well over 30% of journeys taken would need to be walked. The plan intends to increase walking daily throughout an individual's life, for a myriad of purposes, from recreation to commuting.
- 8.34 The strategy identifies barriers to walking which need to be addressed and makes clear the benefits that walking provides. The strategy has outlined three strategic goals to realise a vision of Scotland where places are well designed for walking,
1. Create a culture of walking: A walking culture where Scotland's communities are empowered to develop community-based approaches to walking development and the value of social capital (e.g. through volunteering) can be harnessed.
 2. Better walking environments throughout Scotland: By developing and managing attractive, well-designed places and signed routes close to where people live and work, we will encourage people to use them on a regular basis for health, recreation, sport and active travel. Our modern access rights and range of paths, parks and reserves assets also need to be effectively promoted if more people are to be encouraged to use them on visits to enjoy the outdoors.
 3. Ensure easy, convenient independent mobility for all: By promoting conditions that make it easier and more attractive for people of all ages and abilities to walk, rather than a situation where people do not have the opportunity to walk or walk only if there is no alternative.
- 8.35 By focusing on these aims, the strategy seeks to make walking a more integral part of life in Scotland, leading to a healthier population, reduced carbon emissions, and more connected communities

Cycling Framework for Active Travel - A Plan for Everyday Cycling, 2023 ([DED046](#))

- 8.36 The Cycling Framework for Active Travel - A Plan for Everyday Cycling outlines Scotland's strategy to make walking, wheeling, and cycling the most popular choices for short journeys by 2030. This initiative aims to enhance public health, well-being, neighbourhood quality, and environmental sustainability. The framework emphasises the importance of local active travel strategies in network planning and investment decisions, providing guidance to local authorities on development processes and the use of data and evidence to inform network improvements.
- 8.37 Key strategic themes include the creation of safe cycling infrastructure, effective resourcing, fair access, training and education, and comprehensive network planning. The framework acknowledges the necessity of delivering change at the local level to make tangible differences.

Cycling by Design (Update, 2021) ([DED045](#))

- 8.38 Cycling by Design sets out comprehensive design standards for cycling infrastructure across Scotland. Covering urban, suburban, and rural areas, it aims to create a homogeneous, high-quality cycling network that makes cycling a practical and attractive choice for all.
- 8.39 The design standards intend to establish consistency in infrastructure by developing uniform design standards that provide a seamless cycling experience nationwide. The development of secure and inclusive cycling routes that cater to users of all abilities is an ambition of the design guidance, aiming to improve safety and accessibility for all.
- 8.40 The design guidance is regularly updated to reflect new project experiences and evolving legal or design requirements, with oversight from a Steering Group comprising SCOTS, Sustrans, and Transport Scotland. Additionally, a series of training modules has been developed to help designers apply the guidance effectively. These short videos cover specific themes, outlining core design principles and appropriate levels of service for high-quality cycling infrastructure.

Hydrogen Action Plan, 2022 (DED162)

- 8.41 The Hydrogen Action Plan outlines a strategy to develop a hydrogen economy, supporting Scotland's transition to net-zero emissions. The plan focuses on positioning Scotland as a leading producer and exporter of renewable hydrogen by leveraging its vast renewable energy resources. To achieve this, £100 million (Emerging Energy Technologies Fund) will be invested to advance renewable hydrogen projects. Helping to foster the development of low-carbon infrastructure and driving innovation in hydrogen technologies. The plan also emphasises international collaboration, seeking to establish Scotland as a key global player in the hydrogen market by promoting exports and forming strategic partnerships.
- 8.42 A critical component of this strategy is the creation of a robust regulatory framework that ensures environmental sustainability and public safety while facilitating sector growth. The plan details that Dundee is ideally located adjacent to several offshore wind farms with ambitions to support the development of hydrogen production, refuelling infrastructure and hydrogen vehicle fleets. Michelin Scotland Innovation Parc (MSIP) is a key site, focused on driving innovation and R&D in sustainable mobility and low-carbon energy and offering a wide range of industrial spaces, cutting-edge research facilities and a Skills Centre of Excellence.

Switched On Scotland Phase Two: An Action Plan for Growth, 2017 (DED162)

- 8.43 The Switched on Scotland roadmap, outlines Scotland's long-term strategy to promote the widespread adoption of plug-in vehicles, aiming to eliminate the emissions from combustion vehicles by 2050. The roadmap emphasises the need for a significant reduction in greenhouse gas emissions, improvements in local air quality, noise pollution, and public health, as well as increased energy security and economic opportunities through leadership in sustainable transport and energy technologies.
- 8.44 The roadmap notes that Dundee has implemented several initiatives to promote electric vehicle (EV) adoption,
- Dundee City Council has secured significant funding from the UK Government to support the development of infrastructure in the city. This includes £1.86 million from the Go Ultra Low City Scheme and £515,000 from the Ultra Low Emission Taxi Scheme.
 - In May 2017, Dundee City Council had 83 EVs in its fleet that had driven over 1 million miles and delivered an estimated 70% saving on fuel costs compared to equivalent diesel vehicles.
 - Dundee taxi firm, 203020, reported that its drivers had driven over 2.5 million all-electric miles by May 2017 and that each driver is saving between £120 and £130 a week on fuel.

Update to the Climate Change Plan, Scottish Government, 2018 – 2032 (DED300)

- 8.45 The Climate Change Plan outlines Scotland's strategy to complete a green recovery. Outlined within the plan is the decarbonisation of some of Scotland's largest commercial sectors. The plan includes an ambition to reduce 41% of transport emissions by 2032. Key transport initiatives to achieve this goal

include phasing out the need for new petrol and diesel cars and vans by 2030, accelerating the transition to zero-emission vehicles.

- 8.46 Investments in active travel infrastructure aims to promote walking, cycling, and wheeling, with a goal of 10% of everyday journeys being made by bike by 2030. Public transport improvements, such as decarbonising bus fleets and electrifying rail services, play a significant role in the plan. Low Emission Zones (LEZs) will be established in major cities to improve air quality and encourage the use of cleaner vehicles. Additionally, the plan promotes a shift from road to rail and water freight transport to reduce emissions associated with goods movement. These measures are designed to support a green recovery, improve public health, and advance Scotland's net-zero ambitions.

Reducing car use for a healthier, fairer and greener Scotland ([DED244](#))

- 8.47 This document sets out a route map for achieving the stated Scottish Government aim of reducing car kilometres by 20% by 2030. Included within the document are several behaviour change and supporting measures, some of which may have consequences for future travel options or development standards including, prohibiting pavement parking, investment in the rail network, increasing active travel budget. The document sets out four key strands reducing the need for travel, living well locally switching modes of transport combining trips or sharing journeys.
- 8.48 In March 2025, the Cabinet Secretary for Transport outlined that the Scottish Government has confirmed it will conduct a review of the 20% by 2030 target for car use reduction. Following the Audit Scotland recommendation, the Convention of Scottish Local Authorities is expected to publish a renewed policy statement on car use reduction in Spring 2025. The statement will be informed by the Climate Change Committee and review the existing target and develop a new, longer-term target.

Transport Poverty: A Public Health Issue ([DED295](#))

- 8.49 Where we live and our access to transport play a crucial role in shaping our social and economic opportunities. Public Health Scotland published a briefing, Transport Poverty, A Public Health Issue in 2024 which examines the concept of transport poverty and its implications for health and social equity. Transport poverty is defined as the lack of transport options that are available, reliable, affordable, accessible, or safe, hindering individuals from meeting their daily needs and maintaining a good quality of life.
- 8.50 The report identifies several causes of transport poverty, both within and beyond the transport system. These include inadequate public transportation infrastructure, high costs of travel, and spatial planning that does not prioritise accessible transport options. Poor transport systems can lead to social isolation, limited access to essential services like healthcare and education, further increasing health social inequalities.

Sustainable Travel to Stations Strategy, 2023 ([DED346](#))

- 8.51 This strategy sets out a vision for accessibility of the rail network by sustainable travel modes. In doing so it intends to increase passenger numbers whilst contributing positively towards the goal of net zero. The strategy does not just concentrate on the station buildings but also seeks consideration from development activity within proximity to stations (defined as 5km which includes most of the Dundee City).

National Policy Framework Summary

- 8.52 The current national policy framework detailed above outlines a long-term vision for creating more sustainable, inclusive, and low-carbon transport systems that support environmental sustainability, economic growth, and public well-being. The framework emphasises the importance of behaviour change, whilst encouraging walking, cycling, and wheeling as the preferred choices for short everyday journeys, supported by safe, high-quality infrastructure.

- 8.53 A strong focus is placed on addressing inequalities by making transport more accessible, affordable, and reliable for all—particularly for children, older adults, people with disabilities, and low-income communities. These efforts aim to reduce transport poverty and ensure everyone can access jobs, education, healthcare, and leisure opportunities. Public health is a key driver, with active travel and cleaner air linked to better physical and mental health outcomes, while creating more liveable communities.
- 8.54 The strategies recognise transport's vital role in enabling inclusive economic growth by improving strategic connections and increasing the efficiency and resilience of the transport network. Investment priorities are guided by sustainable transport and investment hierarchies, which focus on maintaining and optimising existing infrastructure before pursuing new development. While national in scope, the policy framework intends to support local planning and delivery, ensuring consistency in achieving Scotland's wider goals for climate action, social equity, and healthier, more connected communities.
- 8.55 There is a focus on reducing transport emissions, meaning development proposals will need to consider low-carbon transport solutions. The policies further stress the importance of addressing transport poverty, which may influence planning to ensure equitable access to services and infrastructure for all residents, particularly in disadvantaged areas.
- 8.56 In summary future developments in Dundee will need to increasingly reflect national objectives around sustainability, equity, health, and net-zero targets, influencing both how the city grows and how people move within it.

Regional Planning Framework

Tayside and Central Scotland Regional Transport Strategy 2024 ([DED287](#))

- 8.57 The Tayside and Central Scotland Regional Transport Strategy (RTS) 2024-2034 was adopted in June 2024. The RTS outlines a thorough framework aimed to deliver a transport system to address the social, environmental, and economic challenges which face Tayside and the surrounding Central Scotland Region.
- 8.58 The strategy emphasises the importance of an action led approach to achieve the ambitions of the strategy. TACTRAN have four key objectives which mirror the strategic objectives of NTS2, which are:
- To take climate action: Implement measures to significantly reduce carbon emissions from the transport sector, aligning with national climate targets.
 - To improve health and wellbeing: Enhance air quality across the region through sustainable transport solutions and promote active travel options to improve public health outcomes.
 - To reduce inequalities: ensure equitable access to transport services for all, including vulnerable and harder to reach populations.
 - To help deliver inclusive and sustainable growth: support inclusive and sustainable economic development by improving connectivity for people and businesses.
- 8.59 The following RTS initiatives specifically relate to enhancing Dundee's transport infrastructure and services,
- 8.60 Public Transport Enhancements: The RTS emphasises the development of an accessible, affordable, and reliable public transport network across the region, including Dundee. This involves exploring alternative models for bus service provision to enhance efficiency and coverage.
- 8.61 Zero Emission Transition: Aligning with national climate targets, the strategy supports the transition to a zero-emission transport network by 2045. For Dundee, this includes initiatives such as supporting the adoption of electric and low-emission vehicles and implementing measures to reduce 20% of all car kilometres driven by 2030.
- 8.62 Social Inclusion and Accessibility: Improve the accessibility of all transport networks, enabling all residents, including disabled and older people, to travel independently. In Dundee, this involves ensuring that transport services and infrastructure are designed and operated to meet the diverse needs of the community, thereby promoting social inclusion and equal opportunities. By implementing these targeted initiatives, the RTS aims to create a more sustainable, inclusive, and efficient transport system in Dundee, enhancing the quality of life for its residents and supporting the city's economic growth.

- 8.63 Action 1 of the RTS relates directly to the proposed LDP and development management process. The action states that *“Planning authorities will reduce the car dependency of new developments”* through the action of *“Development plans promoting land use patterns that reduce the need to travel, and enable travel by sustainable modes”*, and the *“development management process ensuring new development is realistically accessible by a range of modes”*.
- 8.64 The strategy emphasises the need for significant behavioural changes from individuals, businesses, and delivery agencies. It advocates for the prioritisation on areas and groups requiring the most support, ensuring that initiatives are fair, timely, and proportionate. The RTS also highlights the importance of ongoing public engagement to navigate the necessary transformations effectively. By adopting this strategy, TACTRAN aims to create a transport system that is environmentally sustainable, socially inclusive, and economically beneficial for the Tayside and Central Scotland region.

Road Standards: Dundee Streets Ahead (Dundee City Council) ([DED250](#))

- 8.65 Whilst this is not a policy statement the content of this document does influence the delivery of development within Dundee City through items such as cycle and vehicle parking standards and the space standards required for footways, cycleways and roads. The Road Standards: Dundee Streets Ahead document was published in 2005 and is currently being reviewed with a new document expected in late 2025.

Designing Streets ([DED369](#))

- 8.66 Published in 2010 it has sought a design-led approach to streets which concentrates on the six qualities of successful place. It makes a distinction between “Roads” which primarily serve to move people and goods and “Streets” which serve a range of functions with an emphasis on streets being the default design style.
- 8.67 Whilst the document purports to move away from a standards-based approach it, nevertheless, includes measurable standards such as sightline distances for junctions and corners. Such standards are already considered in the Roads Standards document.
- 8.68 The principles of the six qualities of successful place are embedded within Policy 1 of the Local Development Plan 2019 ([DED088](#)).

Dundee Cycling Strategy 2019 ([DED078](#))

- 8.69 Published in 2019, the Dundee Cycling Strategy sought to deliver benefits for cycling within the city to increase cycle use. It identifies in general terms barriers to cycle use and offers commitment to addressing physical constraints within the existing transport network as well as an aspirational network of cycle routes.

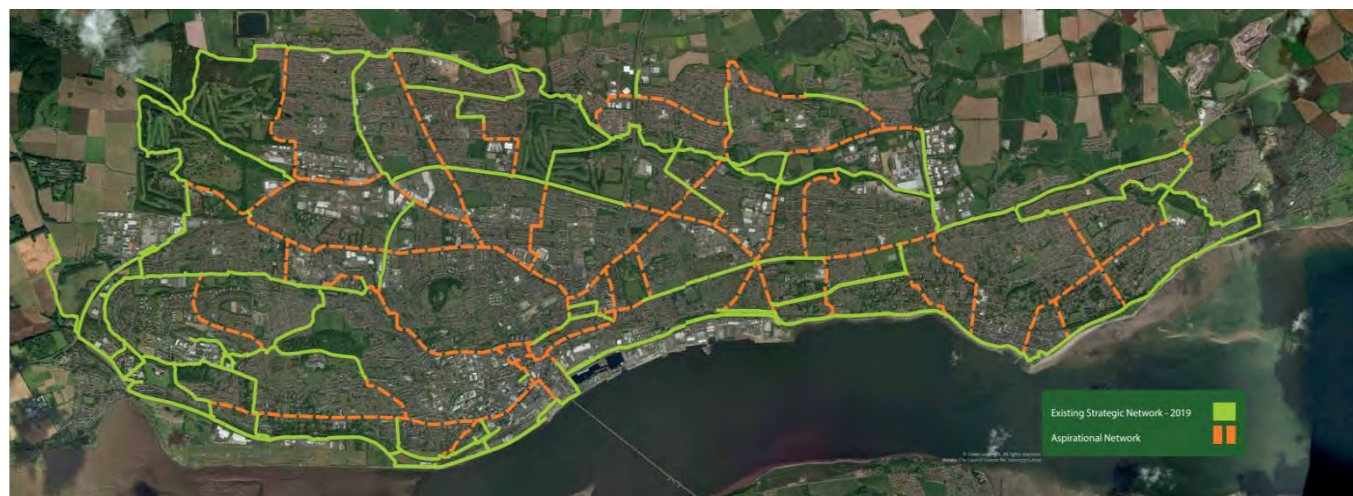


Figure 8.3: INF48 Strategic and Aspirational Network (2019) ([DED078](#))

- 8.70 The targets and measures were written without the knowledge of the Covid-19 pandemic – e.g. it contained a target of a 100% increase in cycle use by 2021. Cycling did increase over that period but 2020 and 2021 saw low demand of all forms of transportation so care must be taken regarding interpreting the targets against survey figures.

Dundee Walking and Cycling Index 2023 ([DED104](#))

- 8.71 Sustran's Walking and Cycling Index (WACI) 2023: Dundee (2024) by Sustrans, provides a detailed analysis of active travel in the city of Dundee. The report is informed by 2023 data, including a survey of 1,215 residents aged 16 and above.
- 8.72 It is detailed within the introduction of the report that Dundee's compact size and that most journeys being taken within the city are under 2 kilometres makes active travel an optimal modal of transport in the city. Despite this the WACI details that safety concerns remain a key barrier, particularly for women and disabled individuals. While 54% of residents walk or wheel at least five days a week, only 62% of women and 65% of men believe the level of safety for walking or wheeling is good. It has been outlined within the report that those within lower socio-economic groups feel less comfortable walking and wheeling within their community than those in higher socio-economic groups.
- 8.73 Cycling, though less common, has shown positive trends, with a quarter of residents cycling at least once a week, increasing from previous years. Improvements in infrastructure, including new segregated cycling routes, have contributed to this growth. As a result, the proportion of residents who think their local area overall is a good place to cycle has risen from 45% in 2021 to 39% in 2023.
- 8.74 The report highlights Dundee's commitment to expanding active travel infrastructure and addressing safety concerns. Public support for further investment in walking and cycling infrastructure is strong, with 58% of residents favouring additional funding for active travel routes.

Residents who travel by the following modes five or more days a week in Dundee

	Walking or Wheeling	Driving	Public Transport	Cycling
2019	55%	47%	20%	2%
2021	54%	35%	12%	3%
2023	51%	43%	16%	3%

Figure 8.4: Methods of transport use, Walking and Cycling Index 2023

Dundee Climate Action Plan (2019) ([DED073](#))

- 8.75 The Dundee Climate Action Plan (DCAP) outlines the city's strategy to achieve net-zero (greenhouse gas) emissions by 2045, in line with the Scottish Governments Climate Change Bill. The plan focuses on four key themes: Energy, Transport, Waste, and Resilience. The transport section of Dundee's Climate Action Plan outlines several key strategy areas to reduce carbon emissions and promote sustainable mobility:
- 8.76 Active Travel Network: DCAP emphasises the development of comprehensive active travel routes to encourage non-motorised transport, creating safe and accessible pathways for pedestrians and cyclists throughout the city.
- 8.77 Public Transport Enhancement: Improving bus services is a priority, with a focus on increasing frequency, reliability, and coverage. The introduction of digital information systems and integrated ticketing aims to make public transport more user-friendly and efficient.
- 8.78 Electric Vehicle (EV) Infrastructure: Building on Dundee's existing EV infrastructure, the plan sets ambitious targets for increasing the number of electric vehicles. By 2025, the goal is for 15% of all vehicles in Dundee to be electric, supported by an extensive network of public and home-based charging stations.
- 8.79 20mph Zones and Road Safety: Expanding 20mph speed limits in residential areas is proposed to enhance safety and encourage active travel. Lower speed limits are expected to create a more pleasant environment for walking and cycling.

- 8.80 **School Streets Initiative:** The plan includes extending 'School Streets'—areas where motor traffic is restricted during school drop-off and pick-up times—to promote child safety and reduce air pollution around schools.
- 8.81 **Mobility Hubs:** Establishing hubs that integrate various modes of transport, such as bike-sharing, car clubs, and public transit, to facilitate seamless and sustainable travel options for residents and visitors.
- 8.82 Regarding transport the plan intends to reduce emissions from transportation, promoting the use of ultra-low emission vehicles, including electric and hydrogen-powered buses, taxis, and bicycles. The development of a Share Mobility platform is suggested to provide real-time information on sustainable transport options. Additionally, the implementation of a Low Emission Zone aims to encourage a shift towards low-carbon transport modes, which has been implemented.
- 8.83 The plan also outlines governance structures, monitoring, and reporting mechanisms to ensure effective implementation and flexibility to adapt to new technologies and knowledge. It calls for collective action from government, businesses, public sector, and individuals to deliver local solutions for a sustainable future.
- 8.84 The following Figure 8.5 details DCAP's Transport Actions which demonstrate the city's infrastructure first approach to increase sustainability, safety and accessibility.

Task	Action	Lead Agency	Partners	Proposed Performance Indicators	Targets	Type of Action	Link to SDG's	Funding in Place
1	Implement the Dundee Cycling Strategy and Councils Active Travel programme in partnership with community groups, improving and increasing cycling paths and infrastructure across the city to reduce the modal share of car based transport.	Dundee City Council	Local Community Groups	• Active travel as a proportion of trips to work (as measured by the Scottish Household Survey).	• Increase no. of journeys made by bike annually in Dundee by 100% by 2021. • Increase the no. of children who cycle to school by 100% by 2021.	Direct	3, 10,	Yes
2	Develop a Low Carbon Active Travel Hub in Dundee Waterfront to include bike hire, cycle parking, bike maintenance, electric vehicle (EV) charge points, an EV car club and community outreach.	Dundee City Council/ private enterprise	—	—	—	Enabling	3, 10, 11, 13	Yes
3	Implement Shared Mobility and Resource Efficiency projects developed by the Mobility in Living Laboratory (MILL) to ensure Dundee remains in a position to take advantage of future innovative mobility solutions including autonomous vehicles.	Urban Foresight	Dundee City Council	• Number of innovative (shared mobility) services introduced in the city (Outcomes based indicators being developed).	—	Direct/ Enabling	3, 10, 11, 13	Yes

4	Ensure safer streets that enable active travel in Dundee including assessing suitable locations for pedestrianisation, 20mph zones and off road/ segregated active travel networks	Dundee City Council	–	–	–	Enabling	3, 10,	Yes
5	Explore options for increasing deployment of low emission buses in Dundee, including hybrid and hydrogen buses.	Dundee City Council, bus companies	Transport Scotland, Scottish Cities Alliance	–	• Number of low carbon buses in operation in Dundee. • CO2 (tCO2e) reduction as a result of low carbon buses.	Direct	3, 11,	No
6	Develop and implement proposals for new Park & Ride sites to the south, west, east and north of Dundee and explore the provision of active travel options for these.	TACTRAN/ Dundee City Council	Transport Scotland	–	–	Direct	3, 8,	No
7	Expand Electric Vehicle (EV) charging hubs and infrastructure across the city	Dundee City Council	Transport Scotland	• (KWh/a) consumption at EV public charging points. • Number of solar charging points.	• 7 charging hubs by the end of 2020.	Enabling	3, 11, 13	Yes
8	Increase EV uptake in Dundee via support and awareness provided by the Drive Dundee Electric campaign and local policy measures, including continued migration to low carbon vehicles within the council fleet.	Dundee City Council	Public and Private Sector	• KWh/a consumption at EV public charging points. • Number of solar charging points. • % EV's in Dundee.	• 25% increase in electric fleet vehicles by the end of 2020. • 20% of all vehicles in Dundee to be electric by 2027.	Direct	3, 11, 13	Yes
9	Establish a Low Emission Zone in Dundee by 2020 to contribute to the broader city objectives and the vision to create a healthy, vibrant and attractive city by protecting public health through improving air quality	Dundee City Council	Transport Scotland, SEPA, SYSTRA, TACTRAN, NHS Tayside	• NO2 , PM10 and PM2.5 levels. • Compliance with regulatory thresholds.	• NO2 – annual mean 40ug/m3, hourly; mean 200ug/m3 (not to be exceeded > 18 times per yr). • PM10 – annual mean 18ug/m3, 24hour mean 50ug/m3 (not to be exceeded > 7 times per yr). • PM2.5 – annual mean 10ug/ m3.	Direct	3, 11, 13	Yes
10	Continued promotion of ECOSTARS schemes to encourage Heavy Duty, Taxis and Private Hire vehicle companies to participate in air quality improvements in Dundee.	Dundee City Council/ private vehicle companies	–	• Increase in ECOSTARS membership	–	Delivery	3, 11, 13, 17	Yes

Figure 8.5 DCAP's Transport Actions

- 8.85 The Dundee Climate Action Plan 2019 has been assessed in relation to climate change further within the Climate Change, Mitigation and Adaption Schedule ([DER002](#)).

Regional Planning Framework

- 8.86 The existing regional transport policy framework reflects the national policy framework intention to deliver more sustainable, inclusive, and low-carbon transport system. With a central focus across all strategies is the promotion of active and sustainable travel, supported by investment in public transport, the expansion of walking and cycling infrastructure, and the transition to zero-emission vehicles. The RTS encourages more equitable access to mobility, especially for vulnerable groups, and highlights the importance of behaviour change and targeted support to achieve its goals. The RTS is complemented by the DCAP, which outlines specific measures such as Dundee's LEZ, School Streets, mobility hubs, and an extensive electric vehicle charging network, all aimed at reducing our reliance on private cars and cutting transport-related emissions.
- 8.87 Together, these policies form an integrated strategy that prioritises climate resilience, public health, social equity, and sustainable development. This policy framework supports a shift away from car-dominant planning toward a more balanced, accessible, and future-oriented transport system.
- 8.88 To support the regional policy framework the upcoming LDP will need to support the reduction of car dependency, support the development of zero-emission transport networks, and ensure that future developments are well-connected to existing transport hubs. There will be a strong emphasis on creating accessible environments for all, with particular attention to vulnerable groups. Streets will need to be designed with a focus on people, safety, and green spaces. The integration of technology, such as the Liveable Neighbourhoods Tool, will help identify areas lacking transport services and guide infrastructure improvements. Additionally, the development of mobility hubs will support multi-modal travel, enhancing overall connectivity. These policies will lead to the creation of a more sustainable, inclusive, and liveable urban environment, requiring planners to incorporate these principles into all areas of development.

Dundee's Existing Transport System and Infrastructure

- 8.89 Dundee City is primarily navigated by a series of arterial throughfares made up primarily of A and B classed roads, the A90 Kingsway, A972 Kingsway East, and the A92 (including the Tay Road Bridge) which are designated trunk roads. The trunk road and motorway network connect Scotland's major cities, towns, and significant transport infrastructure, enabling the movement of people, goods and services ([DED336](#)).
- 8.90 The arterial throughfares are linked by a comprehensive network of C roads which carry less volumes of traffic at a lower rate, however, these roads still perform an import roll of Dundee's road network. The trunk roads and local classified roads make up 28% of Dundee's road network, with the remaining 72% being local unclassified roads ([DED268](#)). These unclassified roads generally have very low importance to vehicle transport and generally hold immediate/local transport significance ([DED291](#)).
- 8.91 In 2023, motorists travelled a total of 530 million miles across Dundee's road network, reflecting an approximate 12% increase since 1993. Over the same period, Scotland experienced a 37% rise in vehicle traffic ([DED374](#)). Compared to the national trend, Dundee has seen a significantly slower rate of traffic growth in the past 30 years.
- 8.92 Cars and Taxis make up many of the annual motor vehicle miles completed in Dundee at 81% in 2023. Since 1993 the number of HGV annual miles has dropped from 20 million to 14 million. Conversely LCV have significantly increased from forty-one million to 83 million miles ([DED374](#)). This increase in LCV miles is connected to the shift of shopping habits. This increase is consistent with national figures, with Transport Scotland detailing that LCV miles have increased by 49% between 2012 and 2022 ([DED335](#)).
- 8.93 The operation and maintenance of Dundee's Trunk Roads is contracted by Transport Scotland to Amey. The remaining adopted roads in Dundee City's Road Network is maintained Dundee City Council ([DED336](#)).

- 8.94 Scottish Transport Statistics use the UK Standard Road Condition Indicators (SRCI) to measure the condition of roads. Dundee city's road network is considered in a good condition against the SRCIs. When considering the condition of the Dundee city's road network, we can compare it with other local authorities as well as the national averages. Apart from B roads that are within an Amber state, all other road classifications and indicators are in a better condition than the national average. When compared to other local authorities the city's road network condition is one of the best performing ([DED374](#)).
- 8.95 Since 2013 the percentage of driver journeys delayed due to traffic congestion has increased from 11.8% to 16%. This is not in line with national trends, with Scottish driver delays only increasing from 9.7% to 10.6% ([DED374](#)). Unfortunately, this data does not detail why congestion is being caused.

20 Mile an Hour Zones

- 8.96 Transport Scotland aims to eliminate all fatalities and injuries on Scotland's roads by 2050. This vision includes an ambitious interim goal to halve the number of people killed or seriously injured on Scottish roads by 2030.
- 8.97 Scotland's Road Safety Framework to 2030 ([DED324](#)) highlights that 43% of serious injuries and 82% of serious pedestrian casualties occur on roads with 30mph speed limits, which are typically urban or suburban. Evidence shows that survival rates in accidents are up to five times higher when a pedestrian is struck by a car traveling at 20mph compared to 30mph. While the evidence base is still developing, early findings suggest that appropriately implemented 20mph zones can effectively reduce fatalities.
- 8.98 Beyond safety, 20mph speed limits enhance the quality of life in residential neighbourhoods by reducing noise, supporting active travel, and improves residential amenity. In 2016, a citywide consultation was conducted to gather the views of Dundee residents on 20mph speed limits, resulting in 20mph schemes being implemented.
- 8.99 At present 33% of the road network identified for 20mph in Dundee are now within a 20mph zone, which is intended to increase to approximately 45% when the 2025/2026 areas are implemented. The remaining roads are to be assessed and future 20mph zones will be brought forward in a phased development. The map below shows the existing and proposed 20mph zones ([DED019](#)).

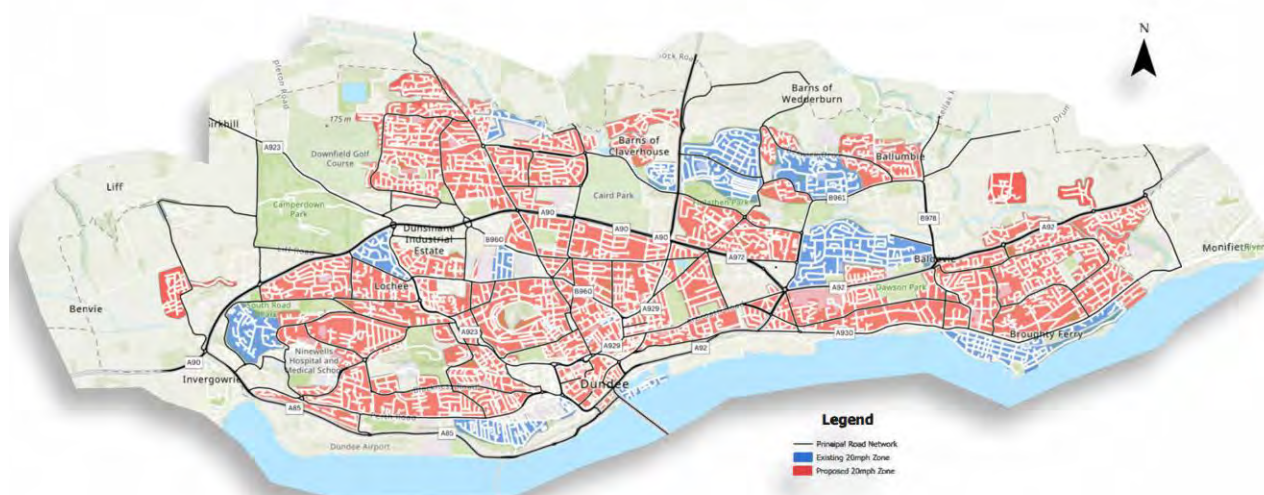


Figure 8.6: INF 53 Existing and Proposed 20mph Zones, 2024 (Dundee Council)

- 8.100 Low Emission's Zone: Dundee's Low Emission Zone (LEZ) was introduced in May 2022, with the goal of improving air quality by restricting access to the city centre for the most polluting vehicles. A two-year grace period was provided, during which enforcement was not active, allowing residents and visitors time to adapt to the new regulations. Full enforcement began on May 30, 2024.
- 8.101 Vehicles that are compliant with the LEZ are:
- Petrol vehicles with Euro 4 emission standards, generally applying to vehicles (typically 2006 onwards).
 - Diesel vehicles with Euro 6 emission standards (typically 2015 onwards).
 - Buses, coaches, and heavy goods vehicles (HGVs) with Euro VI emission standards (typically 2013 onwards).
- 8.102 Non-compliant vehicles entering the LEZ are subject to penalty charges. The initial fine is £60, reduced by 50% if paid within 14 days. Repeat offenses within the same LEZ result in the penalty charge doubling, with a cap of £480 for cars and light goods vehicles, and £960 for buses, coaches, and HGVs. If no further violations occur within 90 days, the penalty resets to the base amount.
- 8.103 The Dundee LEZ encompasses an area within A991 inner ring road, excluding specific car parks such as Bell Street, West Marketgait NCP, and Wellgate. Dundee's LEZ represents a proactive step toward cleaner urban air. Although enforcement data suggest a positive trend in compliance, the full environmental impact has not been assessed, however, it is expected soon. This data could reflect a change in the liveability of the city centre reducing air and noise pollution, improving residential amenity and development opportunity.
- 8.104 Electric Vehicle Charging: The sale of new electric vehicles (EV) is increasing, with 16% of new cars registered in the UK being EVs in 2022 ([DED102](#)). A Scottish Government objective in reaching net zero is to phase out the need for the sale of new internal combustion engine (petrol and diesel) vehicles by 2030. Dundee City Council has been installing EV charging infrastructure across the city to support the transition to electric vehicles since 2011.
- 8.105 To identify the scale of EV charging infrastructure required in the future an assessment of Dundee was undertaken. This assessment found that:
- 53% of properties in the city park their vehicles on-street.
 - 43% of properties have access to off-street / private parking provision.
 - 4% of properties park their vehicles in public car parks.
- 8.106 At present, the charging infrastructure deployed in Dundee can support 11.4% of the city's vehicles being electric. There are currently estimated to be 56 publicly available rapid chargers in the city and 134 fast chargers. To keep up with growing demand more charging points will be required in the city ([DED102](#)). It is estimated to reach the demand of 100% EVs in Dundee, the city would require 317 Rapid Charges (public), 992 Fast Charges (public) and 31,446 Home Charges ([DED102](#)).
- 8.107 Overnight Lorry Parking, 2009 ([DED223](#)) TACTRAN published a study in 2009 that established the extent of overnight lorry parking and identified where further provisions are required. Within the report it detailed that Dundee City Council has no significant lorry parking issues.
- 8.108 The City Council does not permit lorry parking in any of its car parks. It was outlined that the Tayside Truckstop could meet almost half of lorry parking demands in Dundee and that more HGVs were parked in industrial estates across Dundee than the Tayside Truckstop itself. Since the publication of the Overnight Lorry Parking report the Tayside Truckstop has closed.
- 8.109 The publication outlined that any future Lorry Parking should be designed to be secure, accommodating larger vehicles, whilst providing necessary amenities. The Secured European Truck Parking - Best Practice Handbook ([DED276](#)) illustrates how Lorry Parking can be developed to meet the needs of lorry drivers.
- 8.110 The existing LDP protects Lorry Parking within Policy 56: Parking which states "new developments should not adversely impact on the operation of existing lorry parking facilities. Dundee City Council will support the provision of parking facilities adjacent to the A90 within designated economic development areas."

- 8.111 It has been noted within correspondence with TACTRAN that areas of the A90 have areas of concern in relation to lorry parking.
- 8.112 School Street Zones: ([DED252](#)) Dundee's School Streets initiative aims to enhance safety and promote active travel by restricting vehicular access near schools during peak times. Implemented by Dundee City Council, the program addresses concerns about road safety and traffic congestion around school entrances.
- 8.113 School Streets aims to create a safer, cleaner, and more pleasant environment around the schools, with the traffic free roads at the times children are arriving in the morning and leaving in the afternoon. Schools hosting a School Streets Zone on average have a 10% higher level of journeys made by active travel compared to a school that does not host a School Streets Zone ([DED126](#)).
- 8.114 The initiative has received support from local authorities and law enforcement, with Police Scotland actively enforcing the restrictions to ensure compliance and safety.
- 8.115 Rail Dundee Rail Station completed a £38 million refurbishment project in 2018, creating a new gateway into centre of the new Central Waterfront development. Between 2022 and 2023, Dundee had 1,454,560 passengers pass through its station, making it the 9th most popular station in the country. The largest number of journeys to or from this station were made from Edinburgh ([DED376](#)).
- 8.116 Broughty Ferry Station plays an important role in connecting the traditional port town of Broughty Ferry with the centre of Dundee and beyond. In 2022-2023 the station had 84,268 journeys either starting or ending at the station. With 40,164 of those journeys being made to and from Dundee Station ([DED376](#)).
- 8.117 In 2020 there was a significant drop in passenger numbers due to the Covid-19 pandemic. Passenger numbers have yet to recover to pre pandemic figures. This may be due to changes in working and lifestyle behaviours, with an increase in at home working and online shopping.
- 8.118 Bus: Dundee has an extensive bus route network serviced by three commercial operators Xplore Dundee, Stagecoach and Moffat & Williamson, whose performance is regulated by the Traffic Commissioner. Dundee serves as one of the local primary centres for the region, providing employment, education, healthcare, leisure, retail, and recreational services for the surrounding areas.
- 8.119 Dundee City Council is responsible for the provision and maintenance of approximately 1,000 bus stops, including 350 stops with shelters. The network of bus stops has increased over the decades to serve both long-established routes and routes introduced by changing passenger demand ([DED102](#)).
- 8.120 Dundee's bus network plays an important role in Dundee's wider transport network. Due to 35% of Dundee households not having access to a private car, Dundee City bus services are an essential service for the city's transportation needs. Despite the use of the bus network being significantly impacted by the Covid-19 pandemic, changing our working patterns, it is recovering to pre-pandemic passenger numbers, boosted by an increase in younger people travelling by bus.
- 8.121 Since the launch of the free travel scheme for under 22s, over 105 million journeys have been completed by cardholders across Scotland ([DED025](#)). Dundee had the highest individual user frequency, with 59% of eligible users surveyed responding to use the scheme 5 days a week or more. This is believed to be linked to the extensive bus network available across the city. It was reported by Transport Scotland that in April 2023, 73% of young people in Dundee had signed up and used the Young Persons' Free Bus Travel Scheme, the fourth highest rate across Scotland's Local Authorities and 14% higher than the national average ([DED308](#)).
- 8.122 School pupils travelling to school by bus has decreased, from 17.7% in 2014 to 16.4% in 2023. However, bus use increased in 2023 for the third year in a row. Bus use in independent schools increased sharply between 2021 and 2022, from 14.1% to 23.7%. Bus use by children attending nurseries decreased in 2023, falling to 2.5%. Bus use among pupils attending SEN schools increased to 29.2% ([DED142](#)).
- 8.123 Taxi: Taxis form a vital part of the passenger transport offering in Dundee and are particularly important to those with restricted mobility. The provision of taxi ranks is managed by the Council and is reviewed in conjunction with the Taxi Trade representatives to ensure suitable placement. Taxi fares are also regulated by the Local Authority ([DED103](#)). In April 2024, the trade magazine, Private Hire and Taxi Monthly, ranked Dundee 219th (of 365 UK local authorities) for cost, indicating Dundee's taxi fares were lower than the UK average ([DED068](#)).

- 8.124 Dundee City Council operated a derestricted market until 2013 when the Licensing Committee reinstated a limit of 611 licenses. An unmet demand study was undertaken in 2015, and the limit was then reduced to 605. Following multiple unmet demand studies between 2016 and 2023, Dundee City Council has reduced the license limit down to 475 ([DED068](#)).
- 8.125 As of the 26th May 2024, there were 455 licensed taxis operating in Dundee, with 27% of the fleet being fully electric. The private hire fleet consists of 176 vehicles ([DED068](#)). Studies were conducted by Jacobs, on behalf of Dundee City Council, to assess the taxi markets in Dundee. It was found that no significant demand in Dundee for either taxi licences or private hire vehicles ([DED282](#)).
- 8.126 Active Transport: Core to Dundee's transport network future will be the continued development and maintenance of the active travel network, which provides walking, cycling and wheeling routes, which are now placed at the top of the Scottish Transport Hierarchy. Through providing direct, safe, and attractive routes the city aims to make active travel the most convenient method of travel around the city for users of all abilities. Creating health benefits and transport equality with positive secondary benefits to household finances, environmental impact, and mental health, which are all attributed to cities with high levels of active travel.
- 8.127 Increasing the number of people choosing to travel around the city by walking, cycling and wheeling is an important factor in improving the city's health and economic prospects. By developing a network of active travel routes, putting in place infrastructure improvements and delivering a programme of supporting initiatives, the city aims to create the opportunities to bring about a shift in the city's travel habits.
- 8.128 At a national level, active travel is being given greater priority by the Scottish Government with walking, wheeling, and cycling at the top of the sustainable travel hierarchy ([DED204](#)). The Scottish Government has now committed 10% of its total transport budget to active travel, the equivalent of £320m per annum ([DED046](#)). As a city Dundee is increasingly ready to take advantage of this new support for improving active travel.
- 8.129 The Scottish Government recognises that more people walking, cycling, and wheeling more often can improve public health and air quality, combat climate change and address a range of other outcomes ([DED043](#)).
- 8.130 The Walking and Cycling Index is the most comprehensive assessment of walking, wheeling and cycling in urban areas in the UK and Ireland. Delivered by Sustrans each report tracks the progress made towards making active travel more accessible and enjoyable.
- 8.131 Since 2021 participation in walking, wheeling and cycling on a regular basis has decreased. With 51% of residents walk or wheel at least five days a week (54% in 2021) and 10% of residents cycle at least once a week (13% in 2021), in 2023 ([DED104](#)).
- 8.132 Residents of Dundee feel that the safety of those walking and wheeling has decreased since 2021. In 2023 64% of residents believing the level of safety for walking or wheeling is good (73% in 2021) and 49% of residents thinking the level of safety for children walking or wheeling is good (55% in 2021) ([DED104](#)).
- 8.133 With Dundee having the highest percentage of journeys under 5 km among all of Scotland's Local Authorities (Cycling Scotland) and according to the Scottish Household Survey, over half of the trips in Dundee are less than 2 km, active travel has the potential to play an important role in the daily lives of many Dundee residents.
- 8.134 Dundee Core Paths: ([DED043](#)) Core paths are designated routes that provide the public with reasonable access across urban and rural areas for walking, cycling and other non-motorized travel. They are an essential part of Scotland's outdoor access network.
- 8.135 Dundee City Council adopted the Core Path Plan in 2009 (reviewed and amended in July 2023). The plan serves as a strategic document for promoting and protecting active travel routes, improving quality of life, and enhancing the city's green and recreational infrastructure. The plan identifies key routes, or "core paths," that connect communities to essential areas such as parks, open spaces, and local amenities.
- 8.136 The report provides a comprehensive framework for the development, maintenance, and enhancement of these core paths to ensure they are accessible, well-connected, and useable for both residents and visitors of Dundee. It also includes amendments made to the original 2020 plan in response to feedback and changes in priorities or circumstances.

8.137 The core path network provides accessible and free transport making it critical element of Dundee's transport system.

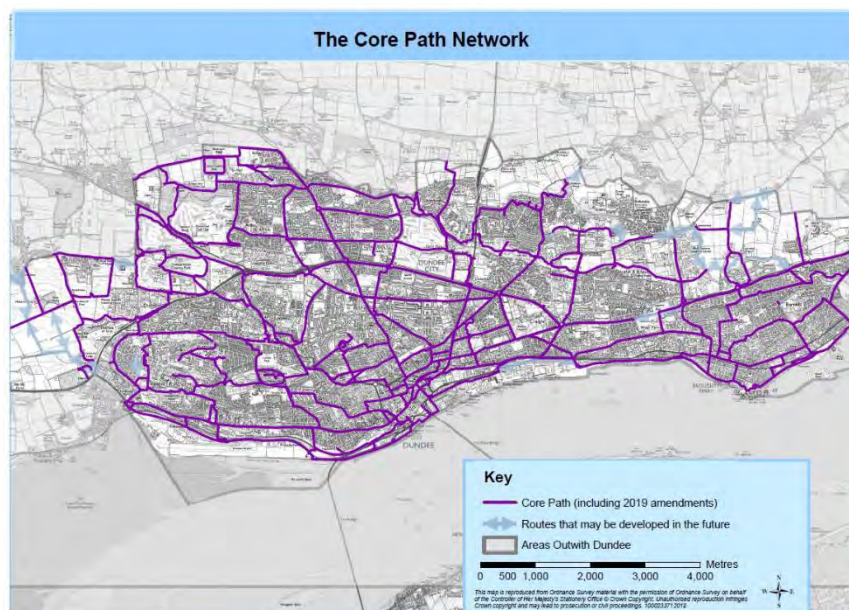


Figure 8.7: INF48 Dundee Core Path Network, Dundee Council

Cycle Storage

8.138 Within in Dundee, it is recognised that there is a lack of available secure storage, representing a barrier to cycling uptake. The 2023 Walking and Cycling Index detailed that 53% of respondents in 2021 stated that convenient secure Cycling storage would help them cycle more. Considering that 51% of residential properties are flats, this is prominent issue throughout the city ([DED104](#)).

8.139 In 2023, an on-street residential cycle storage scheme was implemented in partnership and operated by Cyclehoop. So far 40 bike hangars have been installed across Dundee, located in high density residential areas.

8.140 It was detailed by the Walking and Cycling 2021 Index that Dundee has only one public cycle parking space for every 48 people who cycle in Dundee. The Index highlighted that Dundee has several gaps in public cycle parking provision; district centres, community facilities and the bus station were all found lacking. Since 2021 Dundee City Council has initiated the development of city-wide public cycle parking. In 2023, Dundee City there were 29 cyclists to each public cycle parking spot.

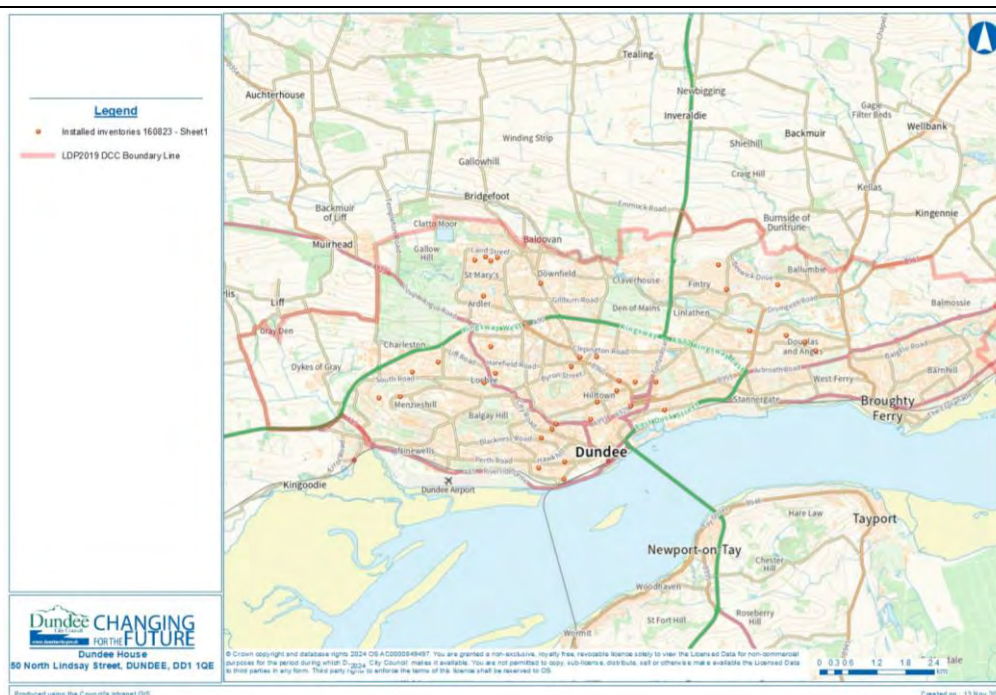


Figure 8.8: INF41 Residential Bike Hangers (Dundee City Council, GIS)

- 8.141 **Ride-on Electric Bike Sharing Scheme:** In 2020, an electric bike sharing scheme was launched by Ride-on in Dundee. Approximately 250 e-bikes and 20 charging stations were delivered across the city. Ride-on offered customers a membership model, with monthly or annual subscriptions, via a dedicated app. The scheme immediately increased access to active travel across the city, from Broughty Ferry to Dundee West End. By June 2021, 25,000 trips had been completed by 20,000 individual users, saving 35,000dg of CO2 emissions. In 2023, Ride-on Scotland received a winding up order and placed into provisional liquidation, ending the scheme.
- 8.142 **Port of Dundee:** The Port of Dundee is located to the north of Dundee City Centre on the river Tay Estuary. It is a large economic generator for the city. The port's sheltered location on the Tay estuary adjacent to the ring road which circles the outskirts of Dundee, provides fast and efficient links in and out of the city.
- 8.143 Handling a diverse range of products (e.g. mineral salt, grains and cereals, fertilisers, iron ore and coal), the port has discharged and loaded vessels with cargoes up to 25,000 tonnes. The Port of Dundee is considered a major grain handling port and hosts the largest grain drying facility in the country.
- 8.144 The Port of Dundee serves the North Sea energy sector, this includes both traditional Oil & Gas and Low Carbon Energy Sources. The Port of Dundee owners, Forth Ports Ltd have invested over £40m to improve their facilities at the Port of Dundee to ensure they are fit for purpose and capable of meeting the demanding requirements of both existing and emerging markets ([DED233](#)).
- 8.145 Since 2012, foreign and domestic traffic to and from the port has decreased by 36%, from 842,000 tonnes to 535,000 tonnes ([DED377](#)). Imports into Dundee significantly exceed exports, with only 8,000 tonnes exported domestically in 2022 ([DED377](#)). Ambassador Cruise Line operates cruises departing from the Port of Dundee to various destinations across Western Europe.
- 8.146 **Dundee Airport:** Dundee Airport is the most convenient fly-in destination for a considerable part of Central East Scotland. Situated only two miles from Dundee City Centre, and less than 10 minutes by taxi from mainline rail and bus stations and lies within five minutes of the main Scottish Trunk Road network. There are three destinations from Dundee Airport, London Heathrow, Shetland and Orkney.
- 8.147 Although Dundee Airport's commercial movements make up less than 1% of Scotland's total commercial traffic ([DED378](#)), the airport is associated with 13% of all local movements within Scotland ([DED035](#)). The airport plays an important role connecting the East of Scotland, Northeast Isles of Shetland and Orkney, and London (Heathrow).
- 8.148 As well as running commercial flights, Dundee Airport has a been associated with a large volume of non-commercial movements, including training, private and recreational flights. In 2022, 34% of all

Scottish Aero Club flights were located at Dundee Airport totalling nearly nine thousand flights. In the same year 8% of Scottish training flights were located at Dundee airport and 6% of Scottish private air travel movements were at Dundee airport ([DED035](#)). The rate of non-commercial flights at Dundee Airport are expected to drop for 2023 with the closure of Tayside Aviation in April 2023, after the flight school went into administration ([DED356](#)).

- 8.149 Dundee Airport has seen an array of routes since the early 2000s, including, Belfast and Amsterdam which have subsequently ended. The flights that are currently running are protected by public service obligations (PSO), which protect the routes till 2025. The PSO are jointly funded by the UK and Scottish Governments, Dundee City Council, with contributions from the Tay Cities Region Deal. With the runway at Dundee airport only being 1400m long, it is restricted to the size of plane and therefore the routes that can be provided from the airport. The airport safety zone extends outwith the Dundee City Council administrative area into Perth & Kinross.
- 8.150 In 2020 the Scottish Government as part of A Connected Tay initiative committed £9.5 million pounds to the development of Dundee Airport ([DED284](#)). The investment will develop new route opportunities, potentially allowing new routes to European destinations. In 2019 the airport had a total of 20,917 passengers which has increased to 32,862 passengers in 2023, an increase of 46% since the initial investment from Scottish Government ([DED378](#)).
- 8.151 The Deal may also support further capital investment in the Airport, including air traffic management infrastructure as well as modifications to the terminal building and airfield. The Tay Cities Region Deal outlined that the investment is intended to increase and sustain tourism to Dundee, whilst improving business opportunities and employment due to improved accessibility.
- 8.152 Dundee Transport Emissions: In 2022, the transport sector was the largest contributor to greenhouse gas emissions in Dundee, accounting for 212 kt CO₂e. This marks a significant shift from 2012, when transport was the second-highest emitting sector at 238.5 kt CO₂e, following domestic emissions, which were at 344 kt CO₂e ([DED379](#)). While transport emissions have decreased since 2012, the rate of reduction has been slower than in other sectors such as Industrial and Public sectors ([DED379](#)).
- 8.153 Despite advancements, transport has become the largest emitting sector in Dundee, with reductions stagnating over the past decade. Dundee like many urban environments faces challenges with air quality, primarily due to emissions from transport, which is the largest contributor to reduced air quality in urban areas. Strategic through-traffic on major routes such as the A90 exacerbates congestion and displaces local traffic into the city centre, further deteriorating air quality ([DED287](#)).

Transport System and Infrastructure Summary

- 8.154 Dundee's transport system is multifaceted and continues to evolve, supporting the city's goals for sustainability, economic development, and accessibility. The city benefits from well-connected infrastructure across road, public transport, and active travel, though it faces ongoing challenges in managing congestion, reducing emissions, and modernising facilities. Although traffic growth has been moderate compared to national levels, congestion is increasingly problematic.
- 8.155 Public transport plays a vital role, particularly given Dundee's lower levels of car ownership. A reliable and well-used bus system underpins local mobility and accessibility. Active travel is a growing priority in Dundee's transport planning. Investments are being made in active travel through initiatives such as "School Streets" and 20mph speed zones that aim to embed long-term sustainable travel behaviours. While the network is expanding, barriers remain—particularly around safety and a lack of secure cycle storage.
- 8.156 The city's environmental goals are further supported by the city centre LEZ, expanding electric vehicle infrastructure, and policies aimed at reducing dependency on private car use. These efforts are integral to Dundee's shift toward greener, more inclusive mobility.
- 8.157 While less central to daily travel for most residents, Dundee's transport hubs also contribute to the city's connectivity and economic base. Dundee Airport and the Port of Dundee are both significant transport infrastructure hubs. These hubs complement Dundee's wider transport strategy by facilitating business travel, tourism, and trade, although they are not major contributors to the city's daily passenger transport volumes.

- 8.158 The transport sector is the largest source of greenhouse gas emissions in Dundee. Although there has been progress since 2012, emissions from transport have declined slower than in other sectors. Road traffic, particularly from strategic routes like the A90, significantly impacts urban air quality and contributes to climate concerns.
- 8.159 Efforts to address this include investment in cleaner transport options, the introduction of the LEZ, promotion of public and active travel, and long-term infrastructure planning aligned with environmental targets. Continued investment and behavioural change will be necessary to meet emission reduction goals while maintaining accessibility and economic resilience.

Upcoming and Proposed Transport Infrastructure Development

Sustainable Transport Delivery Plan 2024 – 2034 (STDP) (DED287)

- 8.160 Dundee City Council is clear in its ambition to create a sustainable city which works for everyone, where active travel is the natural first choice for short journeys. The recently published Sustainable Transport Delivery Plan (STDP) (DED287) clearly lays out the future of active travel in Dundee over the next 10 years. This includes several exciting projects which will transform the way people travel around the city, many of which are soon to begin construction. Below is the delivery plan published within the STDP detailing £230m spending, across a range of infrastructure over a ten-year period between 2024 - 2034.

Short: 1-3 years	Medium: 4-6 years	Long Term: 7-10 years	
Action	Indicative Cost	Potential Funding Partners	Delivery Timescale
Broughty Ferry to Monifieth Active Travel Improvements	£19M	Sustrans Places for Everyone Programme Fund	Short term
Union Street Transformation	£3M	Sustrans Places for Everyone Programme Fund	Short term
Magdalen Green Pedestrian/ Cycle Bridge	£4.5M	Transport Scotland Active Travel Transformation Fund	Short term
St. Leonards Park Regeneration	£6M	Sustrans Places for Everyone Programme Fund, Scottish Water and NatureScot	Short term
Cycle Parking & Storage Infrastructure	£0.75M	Transport Scotland Cycling, Walking, Safer Routes Fund, Cycling Scotland	Short term
20mph zones	£0.5M	Transport Scotland Cycling, Walking, Safer Routes Fund	Short Term
School Streets	£0.25M	Transport Scotland Cycling, Walking, Safer Routes Fund	Short Term
On-street Electric Vehicle Chargers Expansion	£1M	Transport Scotland – Electric Vehicle Infrastructure Fund	Short term
Bell Street Low Carbon Transport Hub	£1.6M	Department for Transport Levelling Up Fund	Short term
Lochee Road Bus Priority Corridor	£15M	Transport Scotland Bus Partnership Fund	Medium term
Forfar Rd / Pikerro Rd Bus Priority Corridor	£15M	Transport Scotland Bus Partnership Fund	Medium term
Arbroath Road Bus Priority Corridor	£15M	Transport Scotland Bus Priority Partnership Fund	Medium term
East End Campus Active Travel Route Improvements	£11M	Transport Scotland Active Travel Transformation Fund	Medium term
Ninewells Campus Active Travel Route Improvements	£2M	Transport Scotland Active Travel Transformation Fund	Medium term
Western Gateway Active Travel Route Improvements	£6M	Transport Scotland Active Travel Transformation Fund	Medium term
Lochee Road Active Freeway	£24M	Transport Scotland Active Travel Transformation Fund	Medium term
Macalpine Road Active Freeway	£1.6M	Transport Scotland Active Travel Transformation Fund	Medium term
Arbroath Road Active Freeway	£20M	Transport Scotland Active Travel Transformation Fund	Medium term
Hawkhill Active Freeway	£10M	Transport Scotland Active Travel Transformation Fund	Long term
Harefield – Strathmore – Dens Road Active Freeway	£20M	Transport Scotland Active Travel Transformation Fund	Long term
Pitkerro Road Active Freeway	£10M	Transport Scotland Active Travel Transformation Fund	Long term
Kingsway Junctions Bus Priority	£15M	Transport Scotland Bus Partnership Fund	Long term
Total	£230M		

The projects identified in this delivery plan are at varying stages of development and cost estimates will be confirmed following completion of detailed design work. Delivery timescales are dependent on national funding awards and not all projects are certain to secure grant funding. Indicative costs presented are based on 2023 prices.

Figure 8.9: INF 30 Sustainable Transport Delivery Plan 2024 - 2034 (Dundee Infrastructure Delivery Plan Summary)

- 8.161 It is outlined on the Dundee City Council's website that the Sustainable Transport Team are currently working on a large amount of Active Travel Projects across the city. In-depth information on each specific project can be found within this page (DED012).

8.162 Electric Vehicle Charging: The table below shows the expected increase in electric vehicles to 2045 and corresponding requirements for charging infrastructure. The public charging infrastructure deployment would require a total investment of approximately £46 million at 2023 prices.

Year	Number of Vehicle	% of Total Vehicles	Required charging posts		
			Rapid Chargers (Public)	Fast Chargers (Public)	Home chargers (Private)
2025	9,507	15%	48	148	4,716
2030	27,252	43%	136	426	13,521
2035	45,631	72%	228	714	22,641
2040	57,673	91%	288	903	28,615
2045	63,377	100%	317	992	31,446

Figure 8.10: INF 29 Sustainable Transport Delivery Plan 2024-2034, Infrastructure for a sustainable mobility future (Dundee City Council, 2023)

8.163 Dundee City Council is actively developing its electric and hydrogen vehicle charging infrastructure to support the transition to zero-emission transport. Currently, most EV charge points in the city are Council-owned, installed using grant funding to encourage early adoption. As the market matures, private sector investment is expected to help drive future network growth. Since 2017, the Council has required new developments to include EV charge points.

8.164 The Council aims to provide a reliable, accessible, and customer-focused public EV charging network, with a tariff model designed to cover operational costs, maintenance, and reinvestment in infrastructure. To expand charging provision, Dundee has applied for £1 million in funding through the Scottish Government's EV Infrastructure Fund, with 76% sourced from private investment. This project aims to deliver 100 on-street and 25 community fast chargers. While public charging infrastructure will meet some demand, home charging will remain significant, as 43% of Dundee's homes have off-street parking. For heavy goods vehicles (HGVs), the Council operates depot-based charging facilities at its Marchbanks and Greenmarket sites, supporting electric lorries and buses. Plans to expand HGV charging infrastructure are underway at the MSIP.

8.165 Dundee is exploring hydrogen fuel cell technology, which offers advantages over batteries for long-range and rapid-refuelling applications, such as road haulage, rail, aviation, and maritime transport. While local authority and bus operations are better suited to battery-electric vehicles, hydrogen is expected to play a role for commercial long-haul operators. Hydrogen refuelling facilities may be located at private stations along Dundee's trunk roads, replicating current diesel refuelling practices. Dundee is collaborating with regional partners to plan a hydrogen refuelling network and support private operators in adopting the technology.

8.166 Through these efforts, Dundee City Council aims to integrate EV and hydrogen technologies into a sustainable, efficient, and forward-looking transport network, ensuring the city remains at the forefront of zero-emission innovation ([DED102](#)).

8.167 20mph speed limits: On the 19th of August 2024, the Fair Work, Economic Growth and Infrastructure Committee (FWEGI) granted the Annual Road Safety Report and 20 mph Progress Report ([DED019](#)). The report outlines the council's commitment to making the city's roads safer and encouraging people to use sustainable modes of transport.

8.168 Currently most residential areas are set at the national speed limit for urban roads which is 30mph. Approximately 75% of the road network is assessed as suitable for 20mph and 30% of the road network has already been reduced to 20mph. The Council also supports 20mph speed limits within new residential developments and through the planning process requires new residential road networks to be designed to limit traffic speeds. The reduction of 20mph speed limits on residential streets will complement other initiatives detailed in this delivery plan which when combined will support the Scottish Government objective to reduce car kilometres by 20% by 2030 ([DED102](#)).

8.169 The funding for the roll out of the upcoming 20mph zones will be met by the following capital funds, the Road Safety Measures (£188,000, 2024/2026), Road Safety Improvement Fund (£223,191,

2024/2025) and the Active Travel Infrastructure Fund (£1,083,683 2024/25) totalling £1,494,874 ([DED019](#)).

8.170 **Active Freeways:** High quality active-travel infrastructure is a keystone to creating a cycling network. A safe, comfortable cycling environment is essential to encourage people for whom safety concerns are a barrier to taking up cycling. Active travel and cycle infrastructure is made up of the existing road network and complemented by traffic-free paths.

8.171 As outlined within the STDP there is an ambition to develop a cohesive network of active travel routes, using active freeway corridors providing a core cycle network, supported by a secondary network to provide connections into local communities and enabling people to cycle safely to the places they want to go throughout Dundee. The strategy intends to upgrade and use existing active travel infrastructure such as the 25-mile Green Circular route that circumnavigates Dundee.

8.172 The Active Freeways project will improve for pedestrians' infrastructure as well as bringing public realm improvements, biodiversity and flood prevention measures. Consultation has been completed to identify the routes and concept designs, with further work to take place on detailed design work ([DED102](#)). The routes proposed are;

- Arbroath Road
- Pitkerro Road
- Hawkhill
- Macalpine Road
- Lochee Road
- Harefield/Strathmore Avenue/ Dens Road corridors.



Figure 8.11: Proposed Active Freeways

8.173 The STDP has outlined these further active travel schemes identified to be delivered in the next ten years (subject to funding),

- Magdalen Green Footbridge
- Union Street Transformation
- St Leonards Park Improvements
- East End Campus Active Travel Improvements
- Western Gateway Active Travel Improvements
- Ninewells Campus Active Travel Improvements
- Broughty Ferry to Monifieth Active Travel Improvements

8.174 Further details regarding Active Freeways can be found on the Dundee City Council website ([DED012](#)).

- 8.175 Cycle parking/storage: Dundee City Council aim to improve access to cycle parking and storage through increasing provision in both residential settings and points of destination. Increased cycle storage throughout the city would enable greater opportunities for communities to use lower cost transport options in accessing active transport to facilitate travel to employment, service, and recreational destinations.
- 8.176 It is recognised that a lack of available secure cycle parking and storage can present a barrier to cycling uptake, with 53% of respondents in the Walking and Cycling Index 2023 stating that access to secure cycle storage at or near home would help them cycle more ([DED104](#)). This finding corresponds with 51 % of properties in Dundee being flats. Dundee City Council aim to improve access to cycle parking and storage through increasing provision in both residential settings and points of destination. Increased cycle storage throughout the city will enable greater opportunities for communities to utilise lower cost transport options in accessing employment, service, and recreational destinations ([DED102](#)).
- 8.177 Mobility Hubs: Dundee has three primary sustainable transport interchanges for regional and national travel, Seagate Bus Station, Dundee Train Station and Broughty Ferry train station. These facilities are supported by sustainable transport interchange options including local bus services near active travel routes, cycle parking, electric vehicle parking and charging facilities, taxi ranks and close links to other provisions such as car club and bike hire.
- 8.178 Development of satellite hubs on the periphery of the City are being considered in partnership with the Regional Transport Partnership and neighbouring authorities. To support Dundee's residents and visitors in using sustainable forms of transport EV charging hubs will be developed at points of destination such as district centres and on strategic routes within the city. These hubs will be located to provide convenient pedestrian access to surrounding amenities.
- 8.179 To support traffic reductions in the city centre, a strategic mobility hub will be developed at the Bell Street multi-storey car park (currently in development). This hub will help support the use of active travel and accommodate the interchange of new upcoming active freeways through the heart of the facility providing connections to the north of the city.
- 8.180 As the number of journeys made by bicycle increase over the forthcoming decade, so too will the requirement for cycle storage at transport interchanges. At present most bus users walk between the bus stop and their destination, however as cycling rates increase it is expected the desire for combined cycle and public transport journeys will increase.
- 8.181 Micro-mobility hubs are small scale interchange facilities which will accommodate bus to cycle interchange. At high use locations this may be complemented by car club vehicles and taxi ranks. Micro-mobility hubs will be prioritised on high density bus corridors at points of route interchange, existing cycle commuter corridors, and population centres. Funding opportunities to develop and deliver a programme of infrastructure improvements will be explored over the forthcoming decade ([DED102](#)).
- 8.182 Rail Infrastructure: Scotland CP7 Strategic Business Plan (DED253) outlines Scotland's £4.2 billion railway investment plan for 2024 to 2029, which focuses on enhancing safety, reliability, and sustainability. As part of that strategic plan is a £130 million investment, renewing signalling assets in Dundee, Aberdeen, Arbroath, and Inverkeilor. The upgrades are intended to improve reliability and efficiency, addressing key operational issues while ensuring long-term sustainability and performance.
- 8.183 SSEN are in the process of consulting on a proposal to build a 132kV substation in the Stannergate area (near Dundee Harbor). The proposed substation would replace the existing Dudhope substation, which provides power to Dundee. Part of the proposal includes a new 132kV feeder station to support Network Rail's ambitions to electrify the rail network within Scotland's Central Belt ([DED212](#)).
- 8.184 The east coast railway runs through Dundee and is scheduled for electrification before 2035. No additional land take is expected but the construction design could result in alterations to the existing transportation network – for example through the need to alter clearance at bridges.
- 8.185 Proposed Bus Infrastructure: Bus Journey times are susceptible to delay from traffic congestion, particularly during peak times at busy junctions on the road network. The STDP has detailed that a Bus Priority Scheme can improve the operational effectiveness of bus services in terms of journey times and journey time reliability. They can also help deliver increased passenger numbers by improving perceptions related to bus service quality. Prioritising buses at junctions and along congested routes, reducing journey times can assist a modal shift from private car to bus, reducing traffic congestion and vehicle emissions ([DED102](#)).

- 8.186 The Tayside Bus Alliance assesses potential bus priority routes in the region and develop business cases through Transport Scotland's Bus Partnership Fund (BPF). The BPF has funded a Scottish Transport Appraisal Guidance study to consider bus priority projects through the Tayside area and Northeast Fife. The study outcomes identify several bus priority corridors within the city where journey time reliability could be improved.
- 8.187 The study identified a number of corridors and locations in Dundee;
- Coupar Angus Rd / Lochee Road
 - Forfar Rd / Pitkerro Road
 - Arbroath Road
 - Kingsway Junctions (Old Glamis, Macalpine, Myrekirk and Strathmartine Road).
- 8.188 Currently all four corridors have been identified and included within the STDP as either medium (4-6 years) or long term (7-10 years) actions.
- 8.189 The number of bus-stops on any route and the distance between them is a key determinant of overall journey time. An over provision of bus stops, while having some benefit for individual passengers, contributes to slower journeys, greater idle time and constrains bus services in competitively competing with the private car. Given the importance placed on bus prioritisation and improved journey times by the bus industry and Scottish Government, it is now recognised that there are too many bus stops on key corridors in the city.
- 8.190 Digital Infrastructure: The development of internet platforms and apps over the last two decades has transformed how customers plan, book, and pay for services online. While private transport operators in Dundee have improved their digital platforms, these remain operator-specific, highlighting an opportunity for integration. Dundee City Council currently manages a multi-operator bus ticket (ABC) that allows passengers to use all local bus services with a single ticket, offering flexibility to users of multiple operators.
- 8.191 The Council aims to expand multi-operator ticketing by integrating booking and payment services across various transport modes, including buses, rail, taxis, car clubs, and bike hire, into a single app. This approach, while challenging due to its scale and complexity, offers significant benefits, including improved customer experience and support for sustainable travel.
- 8.192 At the national level, the Scottish Government's Strategic Transport Project Review (STPR2) recommends creating a National Smart Ticketing Advisory Board to develop an integrated smart ticketing and payment system for all public transport modes. Dundee City Council plans to collaborate with partners to achieve this goal within the next decade, enhancing travel convenience and promoting public and shared transport use.
- 8.193 Roads: There are maintenance, repair and removal work proposed to the Trunk Road network that include:
- A972 Pitkerro Road Footbridge (repairs and removal of temporary propping)
 - A90 Strathmartine Road Footbridge (repairs)
 - A90 Old Glamis Road footbridge (repairs)
 - A90 Kingsway Footbridges (maintenance)
 - Swallow roundabout development completed (maintenance)
 - A90 Forfar Road /Kingsway (remodelled / revised traffic signals)
 - A90 near to Morrisons (maintenance)
- 8.194 Springfield Properties are in the process of delivering a sizeable residential development, known as the Western Gateway / Dykes of Gray Villages. Their proposals came forward as three separate planning applications in 2015 and 2016 and comprise in total circ. 700 dwellings. As part of the planning permissions, the developer is obligated to deliver junction improvements at the Swallow Roundabout to address the impact of this development on the trunk road network and to enable the creation of safe pedestrian and cycle across the roundabout. These works were required to be delivered by the occupation of the 270th dwelling. The developer secured planning permission for these works to the roundabout in 2015 and renewed in 2018, with the developer implementing the consent.

8.195 **Road Safety Infrastructure:** Within the 2024, Annual Road Safety Report and 20Mph Progress Report ([DED019](#)), Dundee City Council outlined the following development programme for road safety infrastructure,

8.196 Pedestrian Crossing

- Balgillo Road/Forthill Road (Complete)
- Kings Cross Road/Dunsinane Avenue (2024/25)
- Macalpine Road/St Leonards Place (2025/26)
- Laird Street at Craigowl Primary School (2025/26)
- Craigie Drive/Craigiebarn Road (2026/27)

8.197 The following areas are to be converted to 20mph zones in 2025/2026:

- Abercromby Street/Montague Street Area;
- Berwick Drive North Area
- Berwick Drive South Area
- Charleston Area
- Lochee Area, north of South Road
- Lochee Area, south of South Road
- Peebles Drive Area
- Whitfield Avenue/Murrayfield Drive Area
- Glamis Road South Area
- Dickson Avenue West End
- Earn Crescent Area
- Charleston Drive North West Area

Dundee Transport Population

8.198 There is a high prevalence of long-term health conditions within the city, including heart disease, diabetes, and respiratory issues. Lifestyle factors such as smoking, alcohol consumption, and diet are the main cause. Mental health issues are also a significant concern in Dundee, with increasing numbers of individuals seeking support for anxiety, depression, and other disorders. ([DED215](#)). In 2022, 25.7% of Dundee's population was recorded within the national census to have disabilities that limited day to day activities, slightly above the Scottish average of 24.1% ([DED367](#)).

8.199 Dundee is expecting a demographic shift with a growing ageing population, the National Records of Scotland (NRS) reports that the population of people aged 65+ in Dundee is projected to increase significantly in the coming decades, with some areas seeing a more rapid rise than others.

8.200 As well as facing significant challenges associated with health and physical accessibility, Dundee ranks as the fifth most deprived local authority in Scotland. It was recorded by Scottish Index of Multiple Deprivation (SIMD) in 2020 that 37.23% of Dundee is within the 20% most deprived parts of Scotland. Although Dundee is recorded as the fifth most deprived authority, the East End ward has the highest proportion of those living in Scotland's most deprived areas at 71.6%, followed by Coldside at 60.9%, and Lochee at 49.4% ([DED380](#)).

8.201 Dundee's unemployment rate has fluctuated in recent years. In 2019, it stood at 6.6% before declining to 5.5% in 2022 ([DED298](#)). The most recent data from the Office of National Statistics (ONS) details that unemployment rates in Dundee have increased to 6.4% in 2023, becoming the highest rate across Scotland ([DED381](#)).

8.202 In March 2024, 4.2% of Dundee City's working-age population were claiming unemployment-related benefits, showing a slight decrease from 4.4% in March 2023. However, economic inactivity—representing individuals aged 16 to 64 who are neither employed nor actively seeking work—rose to 29.3%, up from 25.0% in the previous year. These trends suggest a decline in employment opportunities, coupled with rising unemployment and economic inactivity in Dundee City over the past year ([DED368](#)).

Dundee Deprivation - Transport Poverty

- 8.203 As the planning authority Dundee City Council can play an active role in tackling transport poverty. The briefing recommends a systematic and holistic approach involving cross-sector collaboration. It emphasises the need for policies that ensure equitable transport options, integrating efforts from sectors such as spatial planning, housing development, and climate action. The goal is to create a transport system that supports health, reduces inequalities, and promotes sustainability ([DED295](#)).
- 8.204 Transport poverty can detrimentally affect economic and social opportunities. These issues can be compounded by a car centric transport culture where a private vehicle is perceived to be the default way to travel.
- 8.205 Those who either work part-time or those living in low-income households, are less likely to have access to private vehicles ([DED222](#)) and are generally disproportionately affected by transport systems which priorities traditional commuting times. As these individuals are often working in roles which often include ad-hoc and irregular working patterns, they do not benefit from traditional transport systems that cater to traditional working patterns in their routes, times, and pricing.
- 8.206 TACTRAN reported within the RTS that 11% of Dundee's data zones are at a high risk of Transport Poverty. This is significantly lower than the national average of 36% and neighbouring authorities (Angus 54% and Perth & Kinross 35%).

Cross Boundary Planning

- 8.207 As the main economic and social centre within the region, Dundee experiences a high volume of cross-boundary traffic from neighbouring local authorities. Cross-boundary consideration is vital to avoid constraining movement and access across Dundee City Council's planning authority boundaries. Planning and transport authorities are therefore expected to work closely in the preparation of the Evidence Report and Local Development Plan (LDP).
- 8.208 Engagement with neighbouring road authorities should be undertaken throughout the development of the LDP, addressing cross-boundary transport issues relating to the strategic and local networks, including active travel, public transport, and roads.
- 8.209 Significant engagement has been undertaken with the regional transport partnership TACTRAN, which will continue into the Proposed Plan stage. In addition, TACTRAN's Regional Transport Strategy will continue to inform decision-making in response to cross-boundary collaboration with neighbouring authorities.
- 8.210 Monthly meetings have been held with neighbouring authorities to discuss wider infrastructure matters. These are expected to continue into the Proposed Plan stage, enabling sustained engagement on infrastructure issues. Consideration and engagement will also be given to any allocations made by neighbouring local authorities in proximity to Dundee, particularly in relation to active travel, public transport, and road requirements.

Infrastructure First

- 8.211 The evidence gathered within the report details a policy shift towards active travel prioritisation, which intends to change the way people move within the city. Transportation policy within the proposed LDP should continue to support the sustainable transformation and development of the existing transport systems.
- 8.212 Transport infrastructure plays a critical role in shaping effective, well-functioning cities that foster social well-being and economic prosperity. Delivering high-quality transport systems is a complex task that relies on the provision of appropriate infrastructure. To ensure success, it is essential that transport infrastructure is designed and implemented with a clear understanding of the communities it serves. An "infrastructure first" approach would ensure that transport requirements are integrated from the outset within the Local Development Plan (LDP) and throughout the planning and development process. This approach helps align infrastructure delivery with growth and community needs, promoting sustainable and inclusive urban development.
- 8.213 Dundee's existing transport infrastructure indicates that there are no significant concerns regarding the road network and wider transport system. Despite the existing transport condition, care should be

taken with consideration for any significant development allocations as these may impact the trunk road or existing transportation accessibility.

8.214 The provision of new developments which clearly rely on private car journeys represent an unsustainable form of development. Development proposals that comply with the aims of the sustainable travel hierarchy and support an infrastructure first approach to transport infrastructure, should be supported by proposed LDP policies.

Constraints and Issues of Dundee's Transport Network's Infrastructure

Constraints

8.215 The Tactran Regional Transport - Main Issues Report ([DED359](#)) outlined the following areas of concern for Dundee's existing transport infrastructure system,

8.216 Flooding & Wind:

- Flooding in Broughty Ferry (Dighty Burn) and localised flooding in the City Centre
- Cross Boundary Flooding of the Dundee-Glasgow rail line at Cornton (Stirling Council)
- High wind speeds leading to Tay Bridge closures (A92)

8.217 Pinch Points & Unreliable Journey Times:

- A90 (Kingsway) Swallow Roundabout (under development) / Claypotts
- A92 Arbroath Road

8.218 Air Quality:

- Traffic creating air quality issue.
- City Centre pinch points creating congestion and air quality issue

Traffic and Accidents

8.219 When comparing national transport data with Dundee, it is evident that vehicle miles in Dundee are growing at half the rate of the national average. Between 2013 and 2023, annual traffic in Dundee increased by 5.45% (from 502.5 to 529.9 million miles), whereas traffic across Scotland grew by 10.37% (from 27 to 29.8 billion miles). While Dundee is experiencing slower growth, the increase is still significant and will place additional pressure on the existing road network.

8.220 Since 1979, Dundee City has seen a dramatic decrease in reported collisions. Between 2012 and 2022, Dundee experienced a 40% reduction in reported road collisions. This indicates a positive direction, showing similar changes when compared with neighbouring authorities Perth & Kinross and Angus.

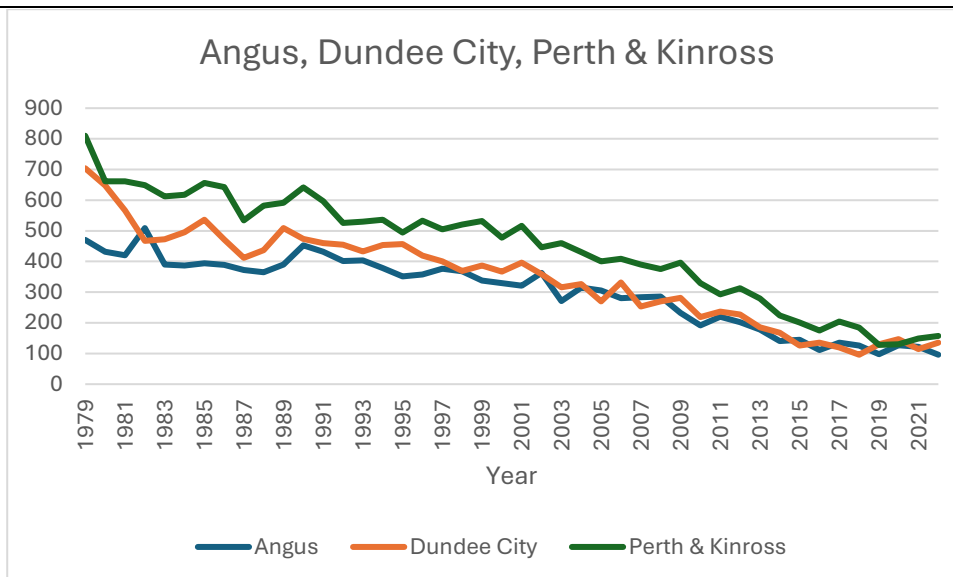


Figure 8.12: Reported collisions by local authority area 1979 - 2021 (Transport Scotland)

- 8.221 Regarding serious injuries, Dundee recorded a 46% reduction between 2012 and 2022. Fatalities in Dundee have remained low in recent years, with 13 deaths being recorded between 2012 and 2022. However, when comparing the average figures from the periods 2014–2018 and 2017–2021, Dundee experienced only a 0.6% reduction in combined deaths and serious injuries, which is significantly lower than the Scottish national average reduction of 37%. This indicates that since 2014 progress has been made nationally, however Dundee trails behind other regions.
- 8.222 The council's Annual Road Safety Report and 20Mph Progress Report: 2024 ([DED019](#)) detailed that the number of road casualties on the local road network in 2023 is an increase of 4% from the baseline average but a reduction of 8% when compared to the previous year. A breakdown of these 2023 casualties shows that 45% were car/taxi occupants, 32% were pedestrians, 10% were motorcycle rider/passenger, 7% pedal cyclists and 6% were bus/goods/other.
- 8.223 There was one reported fatality in 2023 on the local road network because of a collision between a car and a bus. A 5-year moving average between 2014 to 2023 indicates a slight downward trend from previous years. Analysis of the casualties between 2019 and 2023 shows that 2 were pedestrians, 2 motor vehicle drivers, one motor vehicle passenger and one pedal cyclist.
- 8.224 2020 showed an increase in the number of pedestrians, pedal cycle and motorcycle serious casualties and changes in travel choices, because of the pandemic, may have contributed to this rise. 2023 shows a slight rise in the number of pedal cycle and motorcycle serious casualties when compared with 2021 and 2023.
- 8.225 The 2023 casualty data show a drop in the number of children seriously injured from the previous year but no change from the 2014-2108 average. Analysis of these casualties between 2019 and 2023 shows that 78% are pedestrians, 11% are pedal cyclists, 4% are car/taxi occupants, 4% are bus/goods/other occupants and 3% are motorcyclists. Several multidisciplinary and integrated approaches involving engineering, enforcement, education, and encouragement initiatives have been implemented by Dundee City Council ([DED019](#)). The programmes intend support the Government's long-term aspiration for Vision.
- 8.226 While the data indicates some positive developments, Dundee's comparatively slow progress in reducing serious casualties suggests that continued focus and potentially more robust interventions are necessary to bring local outcomes in line with national improvements.

Summary of Transport Infrastructure

- 8.227 Dundee's transport infrastructure is in a transitional phase, evolving from a car-dominated system toward one prioritising sustainability, decarbonisation, and accessibility. The city benefits from a compact

urban form, with most trips under two kilometres, supporting walking and cycling as a transport mode. Active travel infrastructure has improved in both condition and quality, with some segregated cycling lanes, well-maintained footways, and upgraded crossings, though safety concerns remain a notable barrier, particularly for vulnerable groups. Public transport infrastructure is functional but variable in quality; buses are widely available. Rail links are generally considered robust with planned upgrades to increase capacity and connectivity.

8.228 Dundee has made significant strides in low emission and electric vehicle infrastructure and charging hubs. The city centre Low Emission Zone contributes to air quality improvement and reflects an ongoing commitment to high quality, low carbon transport provision. Despite these improvements, challenges persist with car dependency remaining high, and with some walking and cycling routes requiring better maintenance or development. Overall, while the condition of Dundee's transport infrastructure is generally good and quality is improving, particularly for active and low-emission travel, continued investment, careful planning, and targeted interventions are needed to ensure the system is safe, inclusive, accessible, and capable of supporting national and local sustainability and equity objectives.

Summary of Stakeholder Engagement

Stakeholder Working Group

8.229 The below initial stakeholder working group was developed through internal and external individuals with specific interest in the thematic area of transportation. The initial stakeholder working group was restricted to internal Dundee City Council representatives and external contacts within key agency group topic experts. These topic experts have assisted in developing a robust evidence base for the topic paper grouping.

Internal

- DCC Sustainable Transport and Roads

External

- Transport Scotland
- Network Rail

Stakeholder Engagement

8.230 As part of the preparation of the Evidence Report for the Local Development Plan, Dundee City Council undertook targeted engagement on the Sustainable Transport topic paper (DER005). This consultation ran in July and August 2024, focusing on gathering feedback from stakeholders including key agencies, housing developers, planning agents, and community groups.

Engagement Summary Table

8.231 The following table identifies engagement with stakeholders, from the topic paper consultation period onwards, including summary comments and Dundee City Council's responses. Comments are only provided where contributions from stakeholders led to amendments or additions to the evidence base. Where formal disputes could not be resolved through further engagement they are identified in the table and then further detail is provided within the 'Statements of Agreement / Dispute' section.

Respondent	Summary of Comments & DCC Response
Private Individual – (STA026)	Agreed with the summary of evidence, the sufficiency of evidence provided and the implications for the proposed plan.

Private Individual – (STA052)	Agreed with the summary of evidence, the sufficiency of evidence provided and the implications for the proposed plan.
Private Individual – (STA015)	Agreed with the summary of evidence, the sufficiency of evidence provided and the implications for the proposed plan.
Private Individual – (STA039)	The private individual (STA039) initially disputed the Sustainable Transport Evidence Report, disagreeing with the summary of evidence, the sufficiency of evidence provided and the implications for the proposed plan. DCC Response: engaged with the private individual on the 13th of June with an amended draft. After receiving the amended report the private individual withdraw the dispute.
Private Individual – (STA040)	Agreed with the summary of evidence and the sufficiency of evidence provided. The stakeholder detailed that the proposed plan implications were not ambitious enough and that the LEZ is not being expanded and noted that an ULEZ is not being considered. DCC Response: The comments and concerns are noted. The implications for the proposed plan have been written proportionately in response to the evidence considered. These proposed plan implications have been supported by both Transport Scotland and the regional transport body TACTRAN.
Private Individual – (STA014)	Agreed with the summary of evidence, the sufficiency of evidence provided and the implications for the proposed plan.
NatureScot - (STA032)	NatureScot did not dispute the Draft Sustainable Transport Report, however, they did not agree that the list of identified evidence/datasets were sufficient to inform the Proposed Plan. They stated that the Designing Streets Policy Statement (DED369) should be included. NatureScot did not agree with implications to the proposed plan. The following details were outlined by the NatureScot consultation: • Active Travel: Recommend emphasising Dundee’s potential to develop green, active travel networks connecting to surrounding regions (Angus, Perth & Kinross, Fife), especially through the local development plan and projects like the Dundee Eden Project. • Brownfield Development: Support the prioritisation of brownfield sites and suggest adding more explanation about sustainable location choices. • Sustainable Transport Hierarchy: Proposes stronger language to ensure developments align with the sustainable transport hierarchy, especially in greenfield developments and regional connectivity. • Transportation Network Impact: Suggest rewording development locations that reduce transportation impact and removing weak phrases like “wherever possible”. Recommending a principle of “no-net detriment” to safety and performance, with improvements to walking, cycling, and public transport. DCC Response: In response to NatureScots consultation, the report has included the Designing Streets Policy Statement (DED369), and reassessed the implications for the proposed plan to include more focus on Active Travel, Cross Boundary Infrastructure, Sustainable Transport Hierarchy and Transportation Network Impact. The Sustainable Transport

	schedule has not included information specifically to the prioritisation of Brownfield development as this is included with the Business and Industry, Brownfield, Vacant and Derelict Land and Buildings.
Historic Environment Scotland – (STA004)	Historic Environment Scotland agreed with the summary of evidence, with the sufficiency of evidence provided and the implications for the proposed plan.
Homes for Scotland – (STA047)	Homes for Scotland agreed that the evidence provided was sufficient. They stated that they “agree(s) with this to an extent, however, as well as trying to minimise the pressure on transportation, the Council should also ensure that HFS members are able to build homes in marketable locations”. It was noted by the stakeholder that they agree on the sentiment that further residential development could put further pressure on the existing transport networks. It was further detailed that housing developments may be able to assist in providing active travel connections within the site, whilst supporting a change in travel behaviours and the decarbonisation of transport. DCC Response: The comments made by the stakeholder have been considered. Since receiving the response, the Implications for the Proposed Plan have been amended. The following statement “Proposed development should be sited in locations that support sustainable travel, reduce the need for travel and reduce congestion. Whilst enhancing the efficiency of the transport system and delivering social, environmental and economic benefits to the city and beyond. Any development proposals in locations which would be contrary to these aims should not be supported.” recognises the benefit that development can have on the transport system in line with the stakeholder’s comments. The proposed plan implications have been supported by both Transport Scotland and the regional transport body TACTRAN.
Hallam Land – (STA043)	Hallam Land agreed that the evidence provided was sufficient. They stated that they “agree(s) with this to an extent, however, as well as trying to minimise the pressure on transportation, the Council should also ensure that HFS members are able to build homes in marketable locations”. It was noted by the stakeholder that they agree on the sentiment that further residential development could put further pressure on the existing transport networks. It was further detailed that housing developments may be able to assist in providing active travel connections within the site, whilst supporting a change in travel behaviours and the decarbonisation of transport. DCC Response: The comments made by the stakeholder have been considered. Since receiving the response, the Implications for the Proposed Plan have been amended. The following statement “Proposed development should be sited in locations that support sustainable travel, reduce the need for travel and reduce congestion. Whilst enhancing the efficiency of the transport system and delivering social, environmental and economic benefits to the city and beyond. Any development proposals in locations which would be contrary to these aims should not be supported.” recognises the benefit that development can have on the transport system in line with the stakeholder’s comments. The proposed plan implications have been supported by both Transport Scotland and the regional transport body TACTRAN.

Dundee Civic Trust – (STA017)	Dundee Civic Trust agreed with the summary of evidence, with the sufficiency of evidence provided and the implications for the proposed plan.
Transport Scotland (STA053)	Following engagement and correspondence with Transport Scotland the Council actioned a series of requested updates to the Sustainable Transport Report. The Evidence Report now clarifies that the proposed LDP Transport Appraisal will align with Development Planning Transport Appraisal Guidance (DPTAG), rather than Scottish Transport Appraisal Guidance (STAG). Terminology has been updated throughout the document, replacing “Transport Assessment” with “Transport Appraisal” to reflect current practice. The wording has also been revised to emphasise the need to assess cumulative impacts on both the local and strategic transport network. Additional information has been included on the scope and methodology of the Transport Appraisal, including reference to LATIS (Land Use and Transport Integration in Scotland) tools. Updates have been made to reflect the Scottish Government’s 2030 climate and modal shift targets. The section on cross-boundary implications has been revised to include engagement with TACTRAN and neighbouring authorities. Further evidence has been added on network capacity, constraints, road safety and pinch points, drawing on the Regional Transport Strategy, Department for Transport Flow Data, and the Dundee Road Safety Committee Report (2024). These issues are noted for further assessment within the Transport Appraisal.
TACTRAN – (STA030)	Comprehensive consultation was undertaken with TACTRAN. An initial dispute was raised by the transport body in response to the topic paper covering a range of concerns, broadly regarding a lack of evidence. After constructive and collaborative engagement, the amended report was developed, resulting in the dispute being withdrawn. Through the consultation process the amendments made have been incorporated into the Sustainable Transport Schedule and it includes a comprehensive and in-depth baseline evidence report. Offering a detailed and structured analysis of Dundee’s transport systems, infrastructure, and policy frameworks. The Schedule references a thorough range of sources examining all modes of transport. In addition, evidence is included detailing road condition, congestion trends, emissions data, and modal share, helping to better understand how transport intersects with public health, social equity, and climate goals. Whilst also evaluating the implications of transport poverty, accessibility challenges, and demographic shifts.

Summary of Implications for the Proposed Plan

Implications for the Proposed Plan

8.232 The national and regional transport policy frameworks establish that the upcoming local development plan is required to support the reduction of car dependency through the promotion of active travel (walking, cycling, wheeling) and improved access to public transport. This will shape the design and layout of new developments to prioritise pedestrian and cycle-friendly environments and support the creation of 20-minute neighbourhoods where daily needs can be met easily and locally.

8.233 The evidence assessed within this report suggests that there are no substantial issues of capacity within Dundee's existing transport infrastructure network. Dundee's capacity, condition and constraints will continue to be assessed by a transport appraisal during the proposed plan stage, and any significant effect a proposed site may have.

8.234 The implications of the evidence detailed for the Proposed Plan are summarised below,

- Prioritises walking, wheeling, cycling, and public transport in all development planning, as outlined within the National Transport Strategy. Supporting the reduction of car dependency and promoting low-carbon travel, especially in and around new developments.
- Proposed development should be sited in locations that support sustainable travel, reduce the need for travel and reduce congestion. Whilst enhancing the efficiency of the transport system and delivering social, environmental and economic benefits to the city and beyond. Any development proposals in locations which would be contrary to these aims should not be supported.
- Support the delivery of place-based strategies (local living), with infrastructure-first principles to create low-emission, resilient, and equitable transport systems. Supporting climate mitigation as well as improving public health, by creating cleaner air, promoting physical activity, and accessibility. With increase focus on our City and District Centres.
- Restrict developments that do not support the Scottish Governments aim to cut transport emissions and reduce private car travel.
- Be supported by an appropriate and effective Transport Appraisal conducted in accordance with the Development Planning and Management Transport Appraisal (DPTAG) Guidelines.
- Promote well designed transport infrastructure in line with relevant statutory guidance, ensuring the delivery of safe, consistent and inclusive transport infrastructure.
- Support the transition shift from road to rail freight to enhance Scotland's supply chain to become more sustainable and competitive. In accordance with the STPR2 recommendations, to expand rail freight terminals and facilities within the region (Strategy 44).
- Supporting Dundee Airport's operations should continue the current approach which concentrates on supporting the safety of airport operations. There is no expectation of significant new physical development requirements associated with the airport.
- Limit development that detrimentally effects existing Transport Systems such as School Street Zones, Low Emission Zones and Dundee's Core Paths.
- Continue ongoing engagement with neighbouring Local Authorities to facilitate the development of cross boundary transport infrastructure.

Statements of Agreement / Dispute

Statements of Agreement

8.235 As outlined within the Summary of Stakeholder Engagement, a significant level of engagement was carried out with multiple stakeholders during pre-consultation, consultation, and post-consultation of the topic paper. The following organisations agree with the evidence base presented:

- NatureScot
- Network Rail
- Historic Environment Scotland
- Homes for Scotland
- Hallam Land
- Dundee Civic Trust
- TACTRAN
- Transport Scotland

Statements of Dispute

8.236 There were no areas of dispute for the Sustainable Transport Schedule.

Quality Homes & Site Assessment Methodology (009)

Issue: Topic / Place	Quality Homes & Site Assessment Methodology (DER009)
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) Act 1997, as amended: Section 15 (5) • The housing needs of the population of an area, including in particular, the needs of persons undertaking further and higher education, older people and disabled people; and • The availability of land in the district for housing, including for older people and disabled people. Section 16(2)(ab) • In preparing the LDP the planning authority are to have regard to the list published under section 16E of persons seeking to acquire land in the authority's area for self-build housing. Section 16B(3)(b)(i) • The Evidence Report must set out a summary of the action taken by the planning authority to support and promote the construction and adaptation of housing to meet the housing needs of older people and disabled people in the authority's area, and an analysis of the extent to which the action has helped to meet those needs. Regulation 9 Have regard to: • Any local housing strategy (LHS) Regulation 24 A Delivery Programme is to set out the following matters: • The expected sequencing of, and timescales for, delivery of housing on sites allocated by the LDP
Links to Evidence	• National Planning Framework 4 (DED201) • Dundee Local Development Plan (LDP) (DED088) • Planning (Scotland) Act 2019 (DED310) • Draft National Planning Framework 4 (NPF4) – Housing Land Requirement Explanatory Report (DED061) • NPF 4 – Housing Land Requirement – Report Addendum (DED217) • Housing to 2040 (DED160)

	• Scottish House Condition Survey: 2019 key findings (DED325) • A Scotland for the future: opportunities and challenges of Scotland's changing population (DED009) • Housing Statistics 2022 & 2023: Key Trends Summary (DED159) • Homelessness in Scotland: Update to 30 September 2023 (DED158) • Scottish House Condition Survey: 2022 Key Findings (DED328) • Dundee Housing Land Audit 2024 (DED085) • Dundee Housing Land Audit 2024 – GIS Map (DED391) • Greater Dundee Housing Needs and Demand Assessment (HNDA) (DED134) • Dundee Strategic Housing Investment Plan 2023 – 2028 (DED101) • Dundee Local Housing Strategy (2019 – 2024) (DED090) • Scottish City Centres: Increasing Residential Capacity (Dundee) (DED318) • PAS/NHS Scotland – Using the Place Standard Tool to assess the quality of gypsy/traveller sites (DED302) • Scotland's National Strategy for Economic Transformation (DED263) • Existing Housing Need in Scotland – A survey commissioned by Homes for Scotland Report by The Diffley Partnership and Rettie & Co. (DED117) • Scotland's SME Home Builders 2024 (DED315) • Dundee Strategic Housing Investment Plan 2024 - 2029 (DED311) • Empty Homes Strategy (2024 - 2027) (DED312) • Delivery Programme – LDP 2019 (DED313) • Dundee City Centre Strategic Investment Plan (DED067)
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Summary of Evidence

Introduction

9.1 This Schedule reviews evidence identified as relevant in relation to the topic of housing in support of the preparation of Dundee Local Development Plan. The findings of the Schedule provides a robust evidence-base to inform the Proposed Plan, and the resulting spatial strategy for housing.

9.2 This Schedule will be primarily addressing National Planning Framework 4 (NPF4) Policy 16 – Quality Homes. The Schedule also consider a plan-led approach to establishing an indicative Local Housing Land Requirement (LHLR) figure.

9.3 Dundee is an urban authority as per the Scottish Government's Urban Rural Classification 2020, and as a result this Schedule does not include evidence on NPF4 Policy 17: Rural Homes or NPF4 Policy 29: Rural Development.

9.4 The Schedule summarises all evidence and data identified and considers specifically its relevance to Dundee. The implications of the evidence and data have been

considered and how this might inform the Proposed Plan. The conclusions set out are based on a professional judgement as to the land-use planning implications of data examined.

9.5 The Schedule also outlines consultation that has been undertaken thus far, in identifying evidence and datasets through a key stakeholder group and the current stage of public consultation.

Policy Context

National Policy Context

The Planning (Scotland) Act 2019 [\(DED310\)](#)

9.6 The Planning (Scotland) Act 2019 amends the Town and Country Planning (Scotland) Act 1997 and introduces a range of obligations in relation to housing requirements in LDPs. Section 15(5) of the Act states that the housing needs of the population of the area, including, in particular, the needs of persons undertaking further and higher education, older people and disabled people must be considered. In addition, Local Development Plans (LDP) must publish a Local Housing Land Requirement (LHLR) which sets a target for meeting the housing needs of local people.

National Planning Framework 4 [\(DED201\)](#)

9.7 In January 2023, the Scottish Government delivered a new spatial plan for Scotland. The fourth National Planning Framework (NPF4) sets a vision for what Scotland could and should look like by 2050. The framework integrates national planning policies and provides a long-term plan for future development. NPF4 is driven by the overarching goal of addressing climate change, and focuses on achieving four key outcomes:

1. Net zero emissions
2. A wellbeing economy
3. Resilient communities
4. Better, greener places

9.8 Policy 16 encourages, promotes and facilitates the delivery of more high-quality, affordable and sustainable homes, in the right locations, providing choice across tenures that meet the diverse housing needs of people and communities across Scotland.

9.9 The policy promotes a plan-led approach and prioritises development on allocated housing sites identified in the LDP. The policy principles outline that LDPs are expected to identify a LHLR for the area they cover, and deliverable land should be allocated to meet the 10-year LHLR in locations that create quality places for people to live. The LDP Delivery Programme ([DED313](#)) is also expected to establish a deliverable housing land pipeline for the LHLR. NPF4 states that the LHLR is to exceed the Minimum All-Tenure Housing Land Requirement (MATHLR),

Housing to 2040 [\(DED160\)](#)

9.10 Housing to 2040 sets out a vision for housing in Scotland to 2040 and is the first long-term national housing strategy. It aims to deliver the Scottish Government's long-term ambition for everyone to have a safe, good quality and affordable home that meets their needs in the place they want to be.

9.11 Over the period to 2031/32, the Housing to 2040 strategy makes a commitment to increasing housing supply by setting an ambitious target to deliver 100,000 affordable

homes, with at least 70% of these homes for social rent. The strategy is supportive of initiatives such as town centre living, 20-minute neighbourhoods and a place-based approach to development which aligns with NPF4.

Scotland's National Strategy for Economic Transformation ([DED263](#))

9.12 The strategy sets out how, over the next ten years, we aim to deliver economic growth that significantly outperforms the last decade, so that the Scottish economy is more prosperous, more productive and more internationally competitive.

Homes for Scotland – Scotland's SME Home Builders ([DED315](#))

9.13 The data review undertaken for HFS by Rettie & Co and the industry insights secured through survey of SME home builders provides an extensive understanding of sector activity as well as the barriers and challenges it faces in delivering new homes across Scotland. The study shows that the SME sector delivers a substantial volume of units within Dundee (28%), with SME's having more activity across Scotland compared with larger home builders. The study also identified that the number of SME builders being dissolved has increased in recent years since the pandemic.

Local Policy Context

9.14 The Dundee [Local Development Plan \(\[DED088\]\(#\)\)](#) (2019) seeks to encourage a design-led approach to sustainable, high-quality placemaking, with the purpose of achieving quality residential environments through delivering new housing, and in guiding the changes to existing homes and residential areas.

9.15 As such, Dundee's current LDP has a significant emphasis on housing and has a range of policies to support the delivery of quality housing. Figure 9.1 outlines the key LDP policies which guide development in relation to housing:

LDP Policy	Explanation
Policy 9	Housing land release states that priority will be given to the development of the allocated brownfield and greenfield sites.
Policy 10	Design of new housing states that the design and layout of new housing developments in Dundee should be of a high quality and contribute to creating places that respect and enhance the distinct character and identity of the different parts of the city.
Policy 11	Householder development states that householder development will be supported where it meets 4 criteria as outlined in the policy.
Policy 12	Formation of New Residential Accommodation states that the creation of new residential accommodation through the development of existing roof/basement space or the subdivision of existing residential accommodation or change of use will be supported where it meets 3 criteria as outlined in the policy.
Policy 13	Development of Garden Ground for New Housing states that the development of garden ground for new houses will be supported where it meets 6 criteria as outlined in the policy.
Policy 14	Residential Accommodation for Particular Needs states that the development of residential accommodation for particular needs such as the elderly, special needs and varying needs will be supported where it meets 6 criteria as outlined in the policy.
Policy 15	Student Accommodation states that student accommodation will only be supported where it meets 3 criteria as outlined in the policy.
Policy 16	Houses in multiple occupation states that Houses in Multiple Occupation (HMO) that require planning permission* will be supported where they meet 4 criteria as outlined in the policy

Policy 17	Small Scale Commercial Uses within Residential Areas will be supported where the development of a range of small-scale commercial services and facilities close to and within existing and proposed housing areas.
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Figure 9.1: Dundee LDP 2019 Policies

- 9.16 The review of the Dundee LDP will identify a LHLR figure for the area, allocating deliverable land in order to meet the 10-year target, and to exceed the MATHLR.

Local Place Plans

- 9.17 The Scottish Government has introduced Local Place Plans (LPPs) through the Planning (Scotland) Act 2019. These aim to encourage communities to play an active role in the planning process for their area, by giving communities the opportunity to submit ideas and proposals that can be taken into consideration while the LDP is being prepared.
- 9.18 LPPs should be community-led and outline proposals for the development and use of land, providing a new opportunity for communities to contribute ideas and proposals into the planning system. This approach can help communities understand what they want to be like in the future and contribute to the development of a positive community identity. A LPP can be submitted at varying scales, from a single place or building or to cover a wider geographic area.
- 9.19 The Design, Quality and Place Schedule 3 outlines the requirements for LPPs and their role in the LDP process. An invitation to prepare LPPs was issued to community groups in Spring 2023. In order to feed into the early stages of the preparation of the new LDP, LPPs should be submitted by the end of June 2025.

Dundee Local Housing Strategy [\(DED090\)](#) 2019-2024

- 9.20 The Housing (Scotland) Act 2001 places a statutory duty on local authorities to prepare a Local Housing Strategy (LHS) supported by an assessment of housing need, demand and affordability. The Local Housing Strategy is the primary strategy for the provision of housing and associated services to address homelessness, meeting housing needs and tackling fuel poverty.
- 9.21 The Dundee LHS aims to deliver a positive housing future for all people in Dundee by ensuring provision of high-quality housing and neighbourhoods where people want to live. This strategy and its action plans have been developed in partnership with other government agencies, Dundee's Health and Social Care Partnership, voluntary organisations and have been subject to consultation with all these organisations, residents within the city and equalities groups. This strategy sets out Dundee City Council's aims and objectives responding to the housing issues that have been identified:
1. Regeneration/New Build
 2. Private Rented Sector
 3. Climate Change
 4. Community Care
 5. Community Safety
 6. Tackling Poverty
- 9.22 DCC Housing Department are in the process of developing a new Local Housing Strategy which will be published later in 2025 Whilst we cannot reference the revised LHS at this stage, we are liaising with housing on relevant data for inclusion in the Evidence Report and the LHS will inform the Proposed Plan. In preparing the upcoming LHS, we have established partnership working between housing and planning colleagues to ensure that housing delivery and land use planning principles are informed and well-aligned.

- 9.23 Dundee's emerging LHS will give consideration to the introduction of an affordable housing policy, set a housing supply target and an affordable tenures target.

Housing Need & Demand Assessment ([DED134](#)) (HNDA)

- 9.24 The purpose of the HNDA is to provide an assessment of the total additional housing units needed each year for all tenures of housing. The assessment takes into account local demographic changes, housing market activity, economical changes, and local housing pressures. The main output of the assessment is the estimated housing need over the next 20 years, with a focus on the next 10 years and Local Housing Supply Targets (HSTs) are extrapolated from the HNDA.
- 9.25 The HNDA was published in November 2022 after it had been recognised as robust and credible by Scottish Government's Centre for Housing Market Analysis. The Scottish Government provide an HNDA calculation tool prepopulated with data to estimate the number of new homes needed in the area. The HNDA tool works by projecting the number of new households who will require housing across the Tayside region by considering existing households who need new homes, in addition to new households who will need homes in the next 20 years.
- 9.26 The revised existing housing need figures were derived from the following elements:
1. Homeless households/those in temporary accommodation
 2. Households under threat of eviction/repossession
 3. Concealed & overcrowded households
 4. Those requiring specialist housing
 5. Housing Below Tolerable Standard
- 9.27 As housing is a cross-boundary issue, Arneil Johnston were commissioned to deliver a regional HNDA for the Tayside wide region. The HNDA 2023 was the result of significant engagement with stakeholders and provides an evidence-base to inform housing policy decisions as part of the Local Housing Strategy (LHS) and land allocation decisions as part of the preparation of the Local Development Plan (LDP). They are intended to provide long-term estimates that take account of what future housing need might be and inform policy decisions.
- 9.28 The MATHLR figures have been reviewed and refined to reflect the up-to-date HNDA information, using the latest available existing need figures. This has resulted in a revised MATHLR figure for Dundee of 4,300 units over a 10-year period. The MATHLR set out in NPF4 for each authority includes a flexibility allowance to compensate for sites stalling or not delivering as expected - for Dundee the flexibility allowance is 25%.

Dundee Housing Market Area

- 9.29 A priority for the Tayside Housing Market Partners in producing the HNDA was to commission primary research to provide consistent, current and reliable intelligence on the extent and nature of housing need and demand across the Tayside region. Furthermore, partners identified major limitations in relying solely on secondary data to produce HNDA Core Outputs and housing estimates.
- 9.30 Headline findings from 2021 Tayside HNDA Survey for Dundee City can be summarised as follows:



Figure 9.2 1: Headline Figures Tayside HNDA

9.31 Analysis of the origins of households purchasing residential properties in the Dundee City Housing Market Area reveals that:

- 63% of property purchasers in Dundee come from within the City, therefore Dundee can be regarded as a relatively self-contained Housing Market Area
- 20% of transactions in Dundee City take place from purchasers originating from other Tayside partner areas, most notably Angus (10%), followed by Fife (6%) and Perth & Kinross (4%)
- This inward migration is instrumental in validating the cross boundary Greater Dundee functional market area

Existing Housing Need

9.32 As of June 2024, there were 7755 applicants on the housing register for Dundee City Council and its Common Housing Register partners. The existing social housing stock is as follows:

- 1622 sheltered houses, of which 59 are adapted for wheelchair use
- 278 medium dependency houses (amenity)
- 1748 houses fitted with a community alarm
- 204 houses adapted or built for wheelchair use
- 1719 adapted or built for ambulant disabled

9.33 Dundee operates a Common Housing Register where all applicants are held on a single waiting list for all partners in the Register. The partners are Dundee City Council, Hillcrest, Abertay Housing Association and Caledonia Housing Association. Although this does not include all associations operating in Dundee, it does include the largest providers. Figure 9.3 provides an analysis of application by house size – however it is important to note that some households may qualify for more than one house size or type. In addition, the table includes applicants who do not have an assessed housing need according to the Council's allocation policy but have an aspirational "want" for a house.

Bedrooms	Need	Want
0	552	2
1	3883	20
2	1764	3550
3	1305	802
4	558	443
5	132	142

Figure 9.3: Application by House Size

- 9.34 There are 21,826 social houses across Dundee with 12,635 (58%) provided by Dundee City Council and 9,191 (42%) provided by RSLs. Trends show that around 9% of general needs social houses become available for letting in Dundee each year.
- 9.35 Demand for social housing in Dundee outstrips supply: the Common Housing Register for Dundee has 7755 applicants (6,211 with an assessed housing need) for social housing, and with an average of approximately 1000 annual relets this equates to 7.5 applicants for every Council tenancy that becomes available.
- 9.36 Figure 9.4 illustrates a comparison of our stock with the households on our waiting list reveals that there is particular pressure for one bedroom properties and for larger 4/5 bedroom houses. Approximately 53% of waiting list applicants require a one-bedroom property, however, only 32% of council housing stock is one-bedroom. The demand for 3/4/5 bedroom houses is exacerbated by a low turnover of the housing within the stock.

House size	Waiting list applicants	Council Housing Stock	Annual Turnover	% W/L to turnover
1 Bed	3,308	3993	429	771%
2 Bed	1,540	6437	437	352%
3 Bed	1,001	1843	86	1163%
4/5 Bed	362	362	13	2782%

Figure 9.4: Comparison of Housing Stock and Waiting List

Mid-Market Renting

- 9.37 We have no reliable evidence from the Common Housing Register to indicate the demand for mid-market renting. The HNDA estimates a need for between 135 and 230 units (depending on low/high migration scenarios) over a 20-year period.

Homelessness

- 9.38 Dundee has consistently had around 1400 homeless presentations for the past decade. In 2022/2023 there were 1430 new homeless applications made to Dundee City Council, this equates to a 3% increase from the previous year and a 2% increase from the baseline position. However, this needs to be considered in the wider context of increasing levels of homelessness throughout Scotland and unprecedented pressures on housing.
- 9.39 The proportion of households' not containing children is currently at 79% compared to 71% in 2017/2018. This can be attributed to an increase in the number of applications from households without children, and a decrease in the number of households with children as opposed to a large increase or decrease from one cohort.
- 9.40 In terms of demographics, single males continue to be the most common household group and make up approximately half of all applications. The proportion of applications from single females has increased from 21% in 2017/2018 to 25% in 2022/2023. There has been a significant percent change in applications from both 16–17- year olds and applicants over 60 years of age. As the vast majority of presentations from this group are due to being asked to leave or a relationship breakdown with parents, we have made some changes to this pathway for 2022/2023 in recognition of this increase to focus more on prevention and conflict resolution.
- 9.41 There were a total of 1472 cases closed during 2022/2023. For those where there was a duty to rehouse by Dundee City Council, 786 were rehoused into a Scottish

Secure Tenancy and 52 in the private rented sector during 2022/2023. As a proportion of all outcomes 76% of applicants where an outcome was recorded secured settled accommodation.

9.42 Dundee City Rapid Rehousing Transition Plan (RRTP) indicates that 2% of homeless households 2018 and 2019 had a requirement for residential/supported accommodation with future requirements estimated to remain around this rate. There were 757 homeless households who had at least one support need identified with the majority of those requiring support having mental health problems or the need for housing management/independent living assistance. Of those homeless households that require support 16% have medium support needs, 17% require intense wrap around support and 2% require supported accommodation. Dundee has the greatest proportion of homeless households with SMD/Complex support needs across Tayside area.

Projected Housing Need & Demand

9.43 The Housing Need and Demand Assessment (HNDA) [\(DED134\)](#) provides an estimate of growth, between 2021 and 2040 the housing estimates for the Dundee City Area range from: 4660 (using the principal projection) and 6310 (using the high migration projection). By tenure, across the Tayside region it is estimated that:

- 48-58% of housing estimates will be met by social housing
- 11-14% of housing estimates will be met by below market housing
- 12-15% of housing estimates will be met by market rented housing
- 18-23% of housing estimates will be met by market housing

9.44 The LHS should consider the need for housing supply targets that extend beyond the duration of the 5-year LHS period by reviewing historic new build completion rates and considering the wider policy and economic context at a regional and local level. Strategic drivers to inform longer term and short-term housing and development planning policy decisions should be developed using HNDA housing estimates as a starting point.

Affordable Housing

9.45 The objective of this section is to provide a strategic review of the Council's approach to affordable housing provision. The Evidence Report considers various contextual elements, such as policy assessment, strategic considerations, driving factors and implications for proposed plan. This section represents Dundee's approach to addressing affordable housing challenges, acknowledging both current constraints and potential future strategies in Section 11.

Policy Assessment

9.46 The Council have examined current affordable housing strategies both regionally and at city level, evaluating their effectiveness to inform potential policy intervention in Dundee.

9.47 The Council are committed to meeting the local housing land requirement by supporting a diverse housing supply in the city and ensuring compliance with National Planning Framework 4 (NPF4) Policy 16(e). Figure 9.5 below illustrates the existing policy wording approach from NPF4, the Dundee Local Development Plan 2019 (LDP) and associated Supplementary Guidance on Developer Contributions.

Framework	Policy Wording
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NPF4 Policy 16 (e)	<i>“development proposals for new homes will be supported where they make provision for affordable homes to meet an identified need.</i> <i>Proposals for market homes will only be supported where the contribution to the provision of affordable homes on a site will be at least 25% of the total number of homes, unless the LDP sets out locations or circumstances where:</i> <i>(i) a higher contribution is justified by evidence of need, or</i> <i>(ii) a lower contribution is justified for example, by evidence of impact on viability, where proposals are small in scale, or to incentivise particular types of homes that are needed to diversity the supply, such as self-build or wheelchair accessible homes.</i> <i>The contribution is to be provided in accordance with local policy or guidance.”</i>
NPF4 (Annex F)	<i>Defines affordable housing as: “Good quality homes that are affordable to people on low incomes. This can include social rented, mid-market rented, shared-ownership, shared-equity, housing sold at discount (including plots for self-build), self-build plots and low-cost housing without subsidy.”</i>
Dundee LDP (2019) – Paragraph 6.7	<i>“The Local Development Plan will help to meet the Local Housing Strategy outcomes through improvements to the quality, affordability and choice of housing across tenures and markets. This will be realised through the allocation within the Local Development Plan of a range of housing sites across the City which will support the delivery of a variety of affordable housing types and tenures.</i>
Dundee City Council Supplementary Guidance on Developer Contributions	<i>“Following an assessment of housing need, demand and affordability, Dundee City Council does not require contributions from developers towards the provision of affordable housing”.</i>

Figure 9.5: Affordable Housing Policy Wording

9.48 Policy 16(e) of NPF4 requires housing applications to include a 25% affordable housing contribution, unless a different percentage is specified in the LDP. In Dundee, there is no policy requirement within the existing LDP (2019) or associate supplementary guidance for developers to provide contributions towards affordable housing provision.

Current Approach

9.49 Dundee’s current approach to affordable housing primarily relies on a continued partnership approach between the Scottish Government, affordable housing providers and developers. This is facilitated through the managed release of surplus Council-owned land to affordable housing providers as the primary mechanism for supporting the delivery of affordable housing delivery.

9.50 The majority of affordable housing provision within the city is delivered via the Strategic Housing Investment Plan (SHIP) ([DED101](#)), which is managed by the Council and the projects delivered by local housing associations. The current Local Housing

Strategy ([DED090](#)) (2019) set a challenging target of completing 200 social housing units per annum.

9.51 Furthermore, housing development has been supported through the LDP 2019 spatial strategy, which allocates a range of housing sites across the city, promoting the delivery of a variety of affordable housing types and tenures.

9.52

Strategic Considerations

9.53 As has been established in the HNDA, there remains a significant need for additional social rented housing and other affordable tenures. Whilst the Council have supported the delivery of affordable housing through the sale of surplus Council owned land it is recognised that this land supply is finite and is diminishing as a result of a successful delivery of affordable housing on former Council owned sites. Therefore, a long-term sustainable approach to affordable housing delivery requires consideration. Additionally, the Scottish Government's Affordable Housing Supply Programme (AHSP) reduced grant funding by almost 25% in 2023/24. Whilst the impact of this reduced funding has yet to be realised in housing completions, should this funding trend continue, the implications of this will need to be given consideration as part of the review of the LDP, LHS and the delivery of the SHIP. At present, there is no requirement for affordable housing contributions from private developers. These factors indicate a need to explore alternative approaches to sustain affordable housing provision going forward.

9.54 The Council intends to adopt a holistic approach that balances economic growth with housing needs. It is our view that this can be achieved through the development of effective policy mechanisms that ensure development viability remains a core consideration and supports broader development and regeneration objectives.

9.55 Section 11 'Proposed Plan Implications' will provide a strategic forward-looking perspective on affordable housing provision and explore alternative delivery mechanisms to be considered.

Specialist Need Housing

9.56 The HNDA revealed that 47% of households in Dundee have someone who is long-term sick or disabled. The most common long-term sickness or disabilities are physical health problems (24.7%), mental ill health (22.5%) and learning disabilities (7%). This benchmark is lower than the Scottish House Condition Survey (SHCS) (2017-19) which estimates that 54% of households in Dundee have a household member with a long-term illness or disability. The SHCS also estimates that 46% of households in owner-occupation contain one or more long-term sick or disabled person in comparison to 73% of those living in social housing.

9.57 In addition, 9% of households with long term illness or disability in Dundee are limited by their current property, which is the highest of all Tayside partners. The concentration of flatted accommodation in Dundee aligned to a poorer health and mobility profile are likely to be driving factors in this statistic. Furthermore, 16% of older households contain an individual with a long-term sickness or disability restricted by the property, which is 6% points greater than found across Scotland as a whole.

9.58 It is estimated that there are 7,085 units of specialist housing provided by social landlords in Tayside, with 15% of all homes offering specialist forms of housing provision. Dundee accounts for a significant 56% of provision across Tayside, with 3,969 specialist homes in the social housing sector.

9.59 In Dundee, 63% of specialist homes provide housing for older people including sheltered accommodation and 41% of specialist homes provide accessible housing for people with mobility needs. Across all Tayside partner areas, there has been an 8% turnover in specialist housing stock over the last three years comparatively Dundee had 10% turnover over the same period.

- 9.60 Dundee has 666 units of accessible housing, which accounts for 3% of the total housing stock in the city. Across Tayside partners, Dundee accounts for 42% of all accessible housing provision and 5% of lets within the year 2019-20 were for accessible housing with around 108 accessible homes becoming available to let each year.
- 9.61 The HNDA reveals that households in Dundee reported the most significant percentage of unmet need for accessible housing at 13%, significantly higher than the average for Tayside at 8.1%. Over 9000 households express an unmet need for accessible housing in Dundee.
- 9.62 It is important that targets for future adaptation requirements are kept under continuous review to take account of demographic changes, i.e. Dundee's ageing population. The provision will be determined through the review of the LHS and in some instances where adaptation is not possible, there may be a need to identify alternative suitable housing options for such households.
- 9.63 SHCS data suggests that 33% of the housing stock in Dundee has been adapted which equates to approximately 71,000 homes. Scottish Government Housing Statistics also show that 48 properties have benefited from grants since 2014 through Dundee City Council Scheme of Assistance.
- 9.64 The Tayside HNDA (2021) indicates that 30% of households across the Tayside partner areas have property adaptations. This figure is likely to be more representative of the current requirement for adapted housing given the level of statistical confidence achieved in each housing tenure. In Dundee, unmet need for housing adaptations is expressed by 25% of households across the City which is significantly higher than the proportion across Tayside at 16%.
- 9.65 There are 271 units of wheelchair housing in Dundee. The proportion of wheelchair accessible housing in Dundee makes up 1% of all social housing in the City. This is equal to the proportion of wheelchair homes across Tayside (1%). Dundee has the most significant proportion of wheelchair housing in the Tayside area at 66% of all wheelchair homes. The main provider of wheelchair housing is Dundee City Council (55.7%) followed by Hillcrest (15.5%) and Blackwood (13.3%) Housing Associations.
- 9.66 Lastly, 2.2% of survey respondents who said they had a specialist housing need indicated that they had an unmet need for wheelchair accessible accommodation in Dundee. This is slightly higher than the rate for Tayside at 1.7%.

Older People and Disabled People Housing Needs

- 9.67 The Local Housing Strategy ([DED090](#)) has historically had a strong focus on delivery of housing to meet particular needs. Working closely with the Health and Social Care Partnership, the delivery of particular needs housing are met through the Strategic Housing Investment Plan ([DED101](#)) by working with each strategic planning group to commission services as part of the annual planning cycle.
- 9.68 Figure 9.6 demonstrates that in Dundee there is a large demand for wheelchair adapted housing, and the requirements are considered in every new build social rented development. The size of housing required varies from one bed units to 5 bed units, with 84 people on the waiting list as at June 2024.

	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
Mainstream accommodation	21	31	7	4	0
Sheltered accommodation	18	3	0	0	0

Figure 9.6: Wait List Demand for Wheelchair Housing

- 9.69 Since 2015 there has been 45 new build social rented wheelchair units either completed or currently under construction in the City, there are also a further 137 proposed wheelchair units for future developments identified in the SHIP 2019 - 24. SHIP Commissioning Targets 2019-2023 equal 10 wheelchair accessible units per annum.
- 9.70 In 2017, Dundee City had 44 registered places in care homes for older people per 1000 population, which represents an increase of 2.5 places per 1000 population since 2007. Furthermore, there were 34 care homes in Dundee City in 2017 which represents a 3% reduction between 2007 and 2017. Dundee City had 1,098 residents in care homes in 2017, representing an 8% increase from 2007. At this time care home occupancy rates were 87%.
- 9.71 There are 2,953 units of housing for older people in Dundee, 15% of the total social housing stock and 74% of all specialist housing in the Tayside area. In Dundee, there are 885 waiting list applications for housing for older people amounting to 12% of all applications. This equates to 3.19 applications for every available tenancy.
- 9.72 There are 79 supported tenancies provided by social housing providers across Dundee, which account for 0.4% of the total housing stock in the area. There are 296 waiting list applications for supported housing.
- 9.73 In addition to this, there are 211 units of supported housing in Dundee City (Health and Social Care Partnership (HSCP) commissioned tenancies) all of which are for households with learning disabilities. In the absence of data on future need for accommodation with support, Dundee City Council estimate there is a further requirement for 211 HSCP commissioned tenancies. Defining supported accommodation needs for all client groups in Dundee is a priority for the HSCP.

Gypsy/Traveller Housing Needs

- 9.74 The HNDA should set out current need and demand for the provision of sites and pitches for both gypsy/travellers. Gypsy/travellers are recognised as a distinct ethnic group by the Scottish Government. There is a large body of evidence, both in Scotland and in the UK, which shows a lack of access to culturally appropriate housing which is a major contributory factor in poor health, education and societal outcomes experienced by this demographic.
- 9.75 There are estimated to be 15,000- 20,000 gypsy/travellers in Scotland. They are a group protected by equalities legislation, but the community continues to be among the most disenfranchised and discriminated against in Scotland. They have significantly poorer health than any other ethnic group and health is one of the key areas in which the community faces inequalities.
- 9.76 As set out in Greater Dundee HNDA ([DED134](#)) (2023), Tayside partners commissioned a research study into the 'Accommodation Needs of Gypsy/Travellers and Travelling Show people in the TAYplan area'. This study offers the most recent estimates of accommodation/site requirements for Gypsy/Travellers across the Dundee City area.
- 9.77 Key findings from the 2016-2021 study for the Dundee City area are as follows:
- Dundee City Council provides a purpose-built caravan park for use by gypsies/travelling people. It is located in a rural setting at Balmuir Wood, Tealing about 6 miles from Dundee just off the A90, towards Forfar. The study showed that 60% (125) of the Gypsy/Travellers in Dundee were residing in settled accommodation.
 - 47% of council sites for Gypsy/Travellers in Dundee were occupied with 17 households leaving on average annually
 - Dundee has the highest rate of turnover in site pitches of all Tayside areas with an average of 89% of households living on the site vacating each year

- There was projected to be a 55 to 65 surplus in Gypsy/Traveller site pitches across the next 5 years as identified in the HNDA study.

9.78 The Dundee City Local Housing Strategy ([DED090](#)) 2019-2024 sets out a number of ongoing improvement actions associated with Gypsy Traveller site provision in Balmuir Wood site.

People in Higher or Further Education

9.79 The Scottish Household Survey 2020 indicates that there were 5,013 full-time students aged 18-74 in employment in Dundee, with 1,710 unemployed. There are a higher proportion of full-time students living in the private rented sector than any other housing tenure.

9.80 The adopted Dundee Local Development Plan 2019 sets out (in Policy 15: Student Accommodation) that over the past ten years there was comprehensive development of new and replacement purpose-built student accommodation (PBSA) within the City, and that it is considered unlikely that there will be the need over the short to medium term for any significant additions to the supply of purpose-built accommodation for students. In recent years there has been an increase in developer interest for purpose-built student accommodation, and this has resulted in the approval of a number of planning applications within the city centre and circa 1,900 student beds have been approved, and 202 beds have been completed. A number of PBSA units have commenced in the City and Figure 9.7 provides analysis of PBSA in Dundee from April 2021 to March 2025, demonstrating that a significant development pipeline has been established, circa 3,600 beds, with a number of bedrooms under construction, approved or pending decision.

Status	Total Beds
Under Construction	459
Approved	1931
Live Planning Application	60
Proposal of Application Notice	800
Pre-application submitted	894

Figure 9.7: Analysis of PBSA (April 2021 to March 2025)

Strategic Housing Investment Plan ([DED101](#))

9.81 The Strategic Housing Investment Plan (SHIP) ([DED101](#)) is the key statement on affordable housing development priorities within Dundee. The SHIP is a rolling plan/programme covering a period of five years. It is linked to the Local Housing Strategy (LHS), identifying the affordable housing investment priorities outlined in the strategy. The current SHIP covers the period 2019-24. The SHIP target for particular needs housing is up to 30% of the total number of units commissioned.

9.82 The SHIP is embedded in Dundee's Community Partnership Planning Framework and reflects the affordable housing priorities within the city's eight Local Community Planning Partnership areas and multi member ward boundaries.

Housing Stock Profile

9.83 The Greater Dundee Housing Need and Demand Assessment ([DED134](#)) (HNDA) is an evidence base for the formation of Local Housing Strategies and Local Development Plans (LDP). As a minimum requirement, HNDA should aim to address the following key areas of housing policy and planning:

- **Housing Supply Target(s) (HSTs):** to inform the setting of a HST and to inform the LHS and LDP. The HST sets out the extent and nature of housing to be delivered over the period of the plan(s)
- **Stock management:** to assist understanding of the current and future demand for housing by size, type, tenure, and location in order to optimise the provision, management, and use of housing stock. This in turn informs policy making regarding need of future stock
- **Housing investment:** to inform future housing investment and funding, for example through Strategic Housing Investment Plans (SHIPs)
- **Specialist Provision:** to inform the provision and use of specialist housing and housing related services to enable independent living for all, as expressed in policy in the LHS and to inform spatial strategy allocations e.g., land for Gypsy/Travellers
- **Geographic distribution of land:** to inform the spatial allocation of land through the Local Development Plan for new housing at local authority level.

Tenure Profile

9.84 Based on the HNDA Survey, 50% of households in the Dundee area own their property, which is the lowest proportion among all Tayside partners. This is consistent with other data sources such as the 2011 census (50%), 2019 Scottish Government Housing Statistics (45%), and the 2017-19 Scottish House Condition Survey (46%). Compared to the Scottish average, Dundee has a higher percentage of private renting at 15% (survey) versus around 12% for Scotland. The survey also shows that Dundee has the highest proportion of householders renting social housing compared to any other partner area, at 33%.

Stock by Dwelling Size

9.85 The HNDA survey demonstrates that in Dundee, 46% of dwellings are flats/tenements, which is the highest proportion among all Tayside partners. Houses/bungalows make up just over half (53%) of dwelling types in the area. Additionally, the survey highlights that 2 and 3 bedroom properties account for 75% of all dwellings in Dundee.

9.86 Dundee has approximately 17,000 social housing properties, with 55% being flats and 23% being houses. Furthermore, 80% of social housing properties in Dundee have 2 bedrooms or fewer. In terms of the private rented sector (PRS), Dundee City holds 45% of the total PRS properties across the Tayside partner areas, with 15,531 properties out of a total of 34,331.

9.87 The number of registered HMOs in Dundee is the highest among the Tayside partner areas, at 1,434, with 60% of them having between 3 and 4 occupants. Additionally, Dundee City is the most densely populated Tayside partner area, with 25.84 dwellings per hectare. According to Scottish Government Statistics, in 2017, 55% of dwellings in Dundee had up to 3 rooms, with (45%) offering 4+ rooms per dwelling. This dwelling size profile has remained static since 2007 and echoes with Census outcomes in 2001. The 2021 survey results indicate that across Dundee, 54% of homes offer 1-2 bedrooms, with 44% offering 3-4 bedrooms. The 2021 survey results indicate that this bedroom size profile varies significantly by housing tenure with the owner-occupied sector offering a greater proportion of larger homes. In the owner-occupied sector, 47% offer 1-2 bedrooms, with the majority (53%) offering 3+ bedrooms.

9.88 In contrast in the social housing sector, a significantly higher proportion of homes have 1-2 bedrooms (82%) with fewer 4+ bedroom dwellings (3%). Whilst 45% of homes across Dundee offers 4+ bedrooms, the house size profile in the social housing sector will restrict the available housing options of larger household types. The growing population of smaller and single person households across Dundee also raises questions over a growing mismatch of households to homes by property size. According to the HNDA survey, 53% of all dwellings are houses across Dundee, with 46% flats.

The Scottish Household Survey 2019 indicates that there is a much higher proportion of houses in the owner-occupied sector (80%) than flats (20%).

9.89 There are more flats (68%) than houses (32%) in the social housing sector which is similar to private rented sector, where there are 87% flats and 13% houses. There are 1,434 registered HMOs in Dundee, the majority (464) have three occupants. As of 31st March 2023, there were a total of 15,434 houses in multiple occupation licences in force in Scotland. Of the licences in force, 93% are accounted for by just six local authorities – Aberdeen City, Dundee City, City of Edinburgh, Fife, Glasgow City, and Stirling – all of which have cities in.

House Condition

9.90 The HNDA notes that 1% of dwellings in Dundee are considered to be Below the Tolerable Standard based on the SHCS. The survey notes that over one third (35%) of dwellings in Dundee are in urgent disrepair and almost half (48%) of pre-1945 dwellings have evidence of urgent disrepair, the highest proportion of all Tayside partners. Almost 9 in 10 (88%) of Dundee's dwelling have evidence of disrepair, the highest of all Tayside partners and 17% higher than the Scottish average (71%). Dwellings with evidence of condensation in Dundee (16%) is double the rate of the Scottish average (8%). The Scottish Housing Regulator, however, taking into account abeyances and exemptions and a detailed inspection regime, records 99% of social rented stock in Dundee as meeting the SHQS.

Empty Homes

9.91 The Strategic Empty Homes Framework has been informed by a clear understanding of the extent and nature of empty homes across Dundee City Council and their impact on neighbourhoods, communities, homeowners and local residents. To achieve this, an evidence-base has been developed by the Council detailing the number and types of empty homes across the City, as well as important contextual information on tenure estimates, unmet housing need, the incidence of homelessness, the role of the private rented sector and housing condition and quality issues.

9.92 This evidence-base provides a strong understanding of the scale of empty homes as well as the challenges faced in bringing them back into use. This analysis is crucial to informing decisions on how partnerships, investment and innovation should guide empty homes activity and interventions. Figure 9.8 below details the scale of ineffective housing stock within the City and provides a helpful measure of the number of homes which are not in use and are not contributing to meeting housing needs on a permanent basis.

Total Dwellings	75,839
Long-term Empty Dwellings	1,067
Dwellings with Unoccupied Exemptions	1,671

Figure 9.8: Ineffective Housing Stock - Source: DCC Empty Homes Officer (Private Sector Services Unit)

9.93 This demonstrates that empty homes, both 'long-term empty dwellings' and 'dwellings with unoccupied exemptions', account for 3.6% of all dwellings in Dundee City Council. Figure 9.9 sets out how levels of long-term empty and unoccupied dwellings within Dundee City Council compare with levels in Scotland as a whole.

Dundee City Council	1.4% (1,067)	0.6% (485)	2.2% (1,671)	2.81%	2.31%
Scotland	1.7% (46,217)	1.05% (28,280)	1.75% * (47,293)		

Figure 9.9: Empty Dwellings National Comparison – Source: DCC Empty Homes Officer (Private Sector Services)

Buy Backs

9.94 The Open Market Acquisition Scheme allows for the purchase of properties in sizes and types that there is currently the greatest unmet need for within the city's social housing supply. The introduction of the strategy would complement the existing new build Council housing programme and the previously outlined activities within the Strategic Housing Investment Plan (SHIP) for the local social housing sector.

Demolitions

9.95 The HNDA referred to 128 programmed demolitions, and these have subsequently been demolished. There are currently no known occupied houses scheduled for demolition which would require an additional allowance to be added to the housing supply target, to avoid replacement houses being counted as additional units when measuring progress towards meeting the main housing supply target.

Completions by Tenure

9.96 A review of Dundee City completions between 2015-2024 demonstrates an average build rate of 345 units per year. This is similar to the build rate between 2009 – 2019 reported in NPF4 which formed the basis for the MATHLR figure.

9.97 The annual audit of housing land provides a factual statement of land supply within the administrative boundaries of Dundee City Council as at 31 March on each audit year. The audit identifies that there is an effective supply of land for housing across the City.

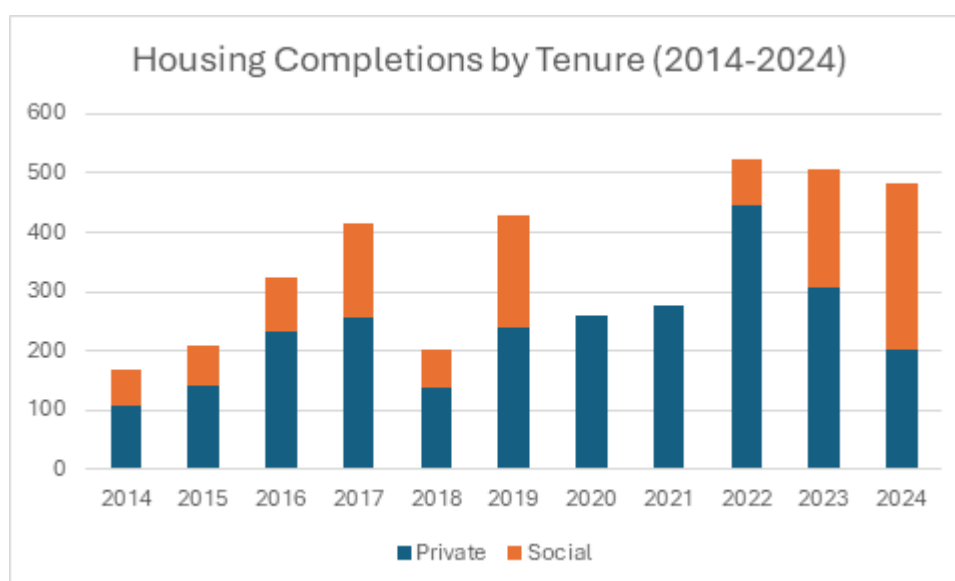


Figure 9.10 2: 10 Year Completions Analysis - Source HLA (2024)

- 9.98 The trend in Figure 9.10 demonstrates that historically, private completions are being delivered at a higher rate in the City than social completions. A look forward to the projections of HLA 2024 ([DED085](#)) demonstrates that this trend is set to continue with private completions projected to continue to exceed social completions.
- 9.99 A breakdown of the effective and constrained greenfield and brownfield land is provided within the document's tables, and all of the sites can be located on the HLA GIS mapping application ([DED391](#)). For more information and full audits from 2014 onwards, visit the Dundee [Housing Land Audit webpage](#).

Small Sites & Windfall Sites

- 9.100 Within all of the housing land audits (prior to 2025) sites of 4 or less residential units on land that had not been allocated for housing were known as small sites. These sites were recorded separately within the Dundee HLA and so are in addition to windfall completions. It is clear from analysing completion rates that small sites make a consistent contribution to the supply of new housing within Dundee. An analysis of historical HLA data evidence that small sites have provided capacity for over 90 units in the past 10 years.
- 9.101 Windfall sites are those which become available for development unexpectedly during the life of the local development plan and so are not identified individually in the Plan. The urban nature and the ongoing regeneration within the city have resulted in windfall sites making a sizeable contribution to the supply of land for new housing in Dundee.

Year	Completions on Windfall Sites	Total Completions
2014	168	168
2015	173	210
2016	130	323
2017	169	416
2018	97	201
2019	217	430
2020	209	260
2021	248	277
2022	405	524
2023	375	506

Figure 9.11: Historic Completions – Source Dundee HLA / Uniform

9.102 Figure 9.11 demonstrates that windfall sites have consistently been delivered in the City. The development of these sites has been consistent with the current spatial strategy of the LDP. The re-use of brownfield sites has been promoted through Policy 9 of our current LDP, providing proposals meet the requirements set out in Appendix 3 and 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. This has allowed the planning authority to be responsive to housing developments coming forward in the right locations and supporting sustainable development.

Self-build

9.103 The Town and Country Planning (Scotland) Act 1997 (Section 16E) requires planning authorities to prepare and maintain a list of people interested in acquiring land in the authority's area for self-build housing, and to publish that information. The Dundee City Council Self-build Register ([DED396](#)) is hosted online and parties interested in self-build housing can register. The Self-build register is published on the Council's website and updated quarterly to provide an update on those registered for self-build exists in the local area. The register has seen limited uptake in interested parties and 3 people have requested to be added.

9.104 In addition, as part of the annual Housing Land Audit, completions on small sites (of less than 4 units) are recorded and it is reasonable to consider that these units have the potential to be self or custom build categories and present a more accurate reflection of potential interest in self-build in comparison to low levels of uptake in the register itself.

Short-term Lets

9.105 From 1st October 2022, the Scottish Government introduced legislation covering the letting of accommodation and new requirements for accommodation to be licensed by the local authority. For those who wish to offer accommodation on a short-term let basis, this legislation means they cannot trade without a licence. Once approved, a licence is valid for 3 years.

9.106 Licences are required for:

- those who wish to let a property where they don't usually reside (i.e. a second home),
- let their all or part of their home while they are absent (i.e. on holiday)
- use part of their home on a short term let (i.e. home sharing)

9.107 Since legislation came into force, Dundee has received 31 planning applications and 224 licensing applications for short-term lets (STL). We anticipate an increase in STL applications as applicants become aware of the requirement for planning permission. A GIS-system is being maintained with details of all applications. No significant or city-wide issues are evident in Dundee and there is no intention to focus resources on designating a control area at this time. It is, however, our intention to monitor impact of STLs on an individual basis, and if the need arises in the future, a STL Control Area can be established.

Household and Population Projections

Household Projections

9.108 The HNDA ([DED134](#)) captures contextual information on the operation of the housing system to develop policies on new housing supply, the management of existing

stock and the provision of housing related services. It uses National Records of Scotland (NRS) data from 2018 to estimate the housing need and demand for Dundee from 2021-2041. The output over the projected period is for total number of new households ranging from 2450 4060. The housing estimates are projected against two scenarios: principal projection and high migration over 5-year periods.

9.109 Informed by demographic analysis presented in Core Output 1 (Housing Market Drivers), the Dundee City area has shown positive household growth in the last decade, albeit at half the rate of the wider Tayside region (2.5% between 2008 and 2018). Given the ambitious economic growth strategy within the Tayside City region but in Dundee City specifically, partners felt that an ongoing growth projection could be justified as a reasonable scenario with the HNDA calculation.

9.110 On this basis, partners opted to create two scenarios: one using the NRS principal household projection for the Dundee City area and one using the NRS High Migration scenario.

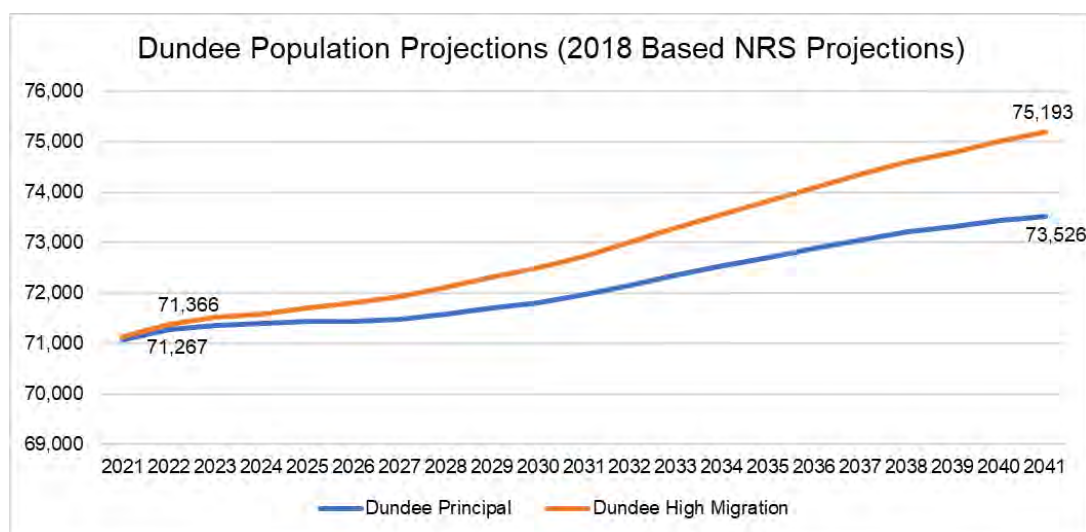


Figure 9.123: Dundee Household Projections - Source: National Records for Scotland

9.111 The outcomes of household projection scenarios create an estimate of new households emerging in the Dundee region over the next 20 years of between 2,449 using the principal household projections and 4,060 using the high migration/growth scenario.

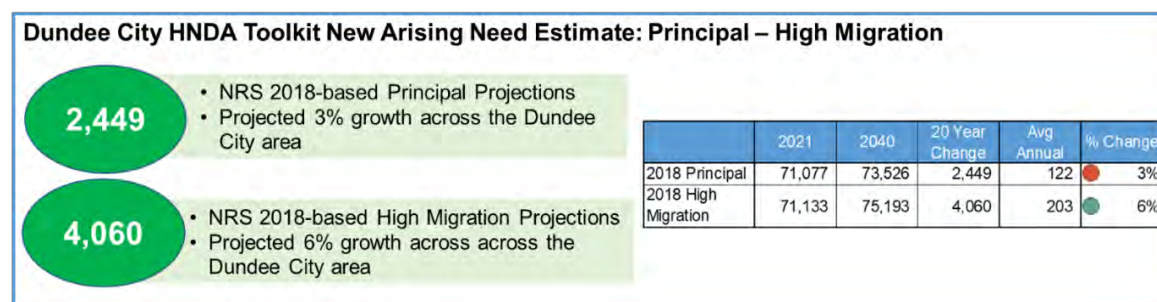


Figure 9.13 4: Migration Scenarios - Source: HNDA (2023)

9.112 The principal household projections estimate an overall growth in households across the Dundee City region of 3%. These projections create an average annual increase of 122 households in Dundee. The high migration/growth scenario estimates an overall growth in households across Dundee of 6%. These projections create an average annual increase of 203 households across the City.

9.113 There has been a 2.5% increase in the number of households between 2008-2018 in Dundee which is the smallest change in the Tayside area. Dundee is expected to have a 4% increase in the number of households between 2021 and 2043, which could stretch to 6% if there is high migration. The HNDA Survey revealed that Dundee had the highest percentage of people with a desire to move (47%) and the lowest percentage (77%) of respondents who wanted to move within Dundee. Furthermore, 2018-based household projections suggest that Dundee's household numbers will increase slightly between 2018 and 2028 from 70,337 to 71,581.

Population Projections

9.114 Dundee has experienced minimal population growth at 2% between 2000-2019. In terms of population projections, the population in Dundee is projected to change by less than 1% across the period 2018-43. In 2018/19 Dundee City experienced the highest % of overseas in migration (113%) and within Scotland out migration (-38%). Like all other Tayside areas, Dundee's younger and working age population is expected to decrease between 2018 and 2038 and the 65+ older people age group is expected to increase (17%) although this increase is the lowest amongst Tayside partners.

Housing Land Supply

9.115 The annual audit of housing land provides a factual statement of land supply within the administrative boundaries of Dundee City at 31st March 2024. The audit identifies that there is an effective supply of land for housing across the City.

9.116 HLA 2024 ([DED085](#)) indicates that Dundee has the capacity to deliver an estimated 3888 units city-wide on a range of brownfield and greenfield sites. Of this figure, 3607 are programmed as deliverable and a number of sites have been categorised as constrained and do not contribute towards the housing supply at this time.

9.117 Figure 9.14 illustrates how the housing supply has been programmed, with the majority of units projected to be deliverable in the period 2025-2034. The Council's target date to adopt the next LDP 2028 and analysis of HLA 2024 indicates that 1892 units are programmed to be delivered prior to the adoption of the next LDP leaving a deliverable supply of 1715 units to be carried forward into the Plan, subject to site assessment.

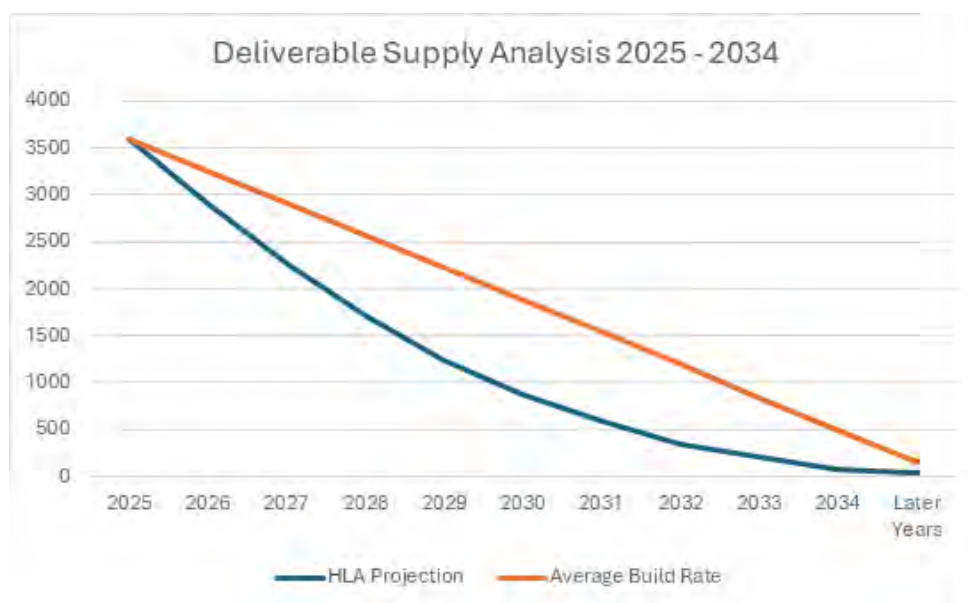


Figure 9.14: Supply Scenario Comparison - HLA 2023 based

9.118 A range of market pressures are anticipated to slow the build rate and so a conservative and proven build rate is of relevance when assessing our Housing Land Supply. This would result in an increase in the support of deliverable housing sites being brought forward into the next LDP. Additionally, the LDP review will trigger an assessment of allocated sites and may lead to the removal of inefficient sites, impacting housing supply.

Local Housing Land Requirement

9.119 A key role for LDPs is to identify a Local Housing Land Requirement (LHLR) with a transparent and understandable explanation of how the figure has been calculated. NPF4 states that the LHLR figure must exceed the 10-year Minimum All Tenure Housing Land Requirement (MATHLR). The planning authority's views on the matters listed under Section 15(5) of the Act are expected to inform the LHLR which will provide a target for meeting housing needs of people living in the area as required by Section 15(1A). The indicative figure will be informed by MATHLR, HNDA, HLAs, self-build, windfall assumptions and LHS. This chapter will discuss the range of factors that will influence the LHLR and will provide an evidence-base to establish what an appropriate uplift from the MATHLR would be for Dundee.

MATHLR

9.120 NPF4 Annex E sets out the 10-year MATHLR for each planning authority area. Planning authorities must take this into account in arriving at their indicative LHLR. It is expected that the MATHLR is the minimum amount of land for housing to be included within LDPs, and that the LHLR will exceed the MATHLR. The methodology for the initial MATHLR figure is set out in the Scottish Government Housing Land Requirement: Explanatory Report ([DED061](#)) and the finalised calculation is also set out in NPF 4 – Housing Land Requirement – Report Addendum ([DED217](#))

9.121 Dundee's MATHLR figure is set out below in Figure 9.15.

Existing Housing Need (A)	Newly Forming Households (B)	Total (A+B = C)	Flexibility Allowance (D)	Flexibility Allowance Calculation (C x D) = E	MATHLR (C + E)
250	200	3350	0.25	863	4300*

Figure 9.15: Dundee's MATHLR Calculation

9.122 The Minimum All-Tenure Housing Land Requirement (MATHLR) is contained within Annex E of National Planning Framework NPF4. In finalising the MATHLRs, the Scottish Government have continued to use an evidence-based approach to refine the figures. For those instances where a local authority has completed a new Housing Need and Demand Assessment (HNDA) since Draft NPF4 was published, where applicable, information from this has been used to update existing need inputs.

9.123 An analysis of Dundee's build rate over the last ten years demonstrates an average annual build rate of 345 units per year. Based on this, it is not rational to propose a significant uplift on the MATHLR figure as this will not necessarily result in higher build rates.

9.124 The MATHLR has a robust evidence base and combines past development rates with future projections in line with local policy ambitions. However, the LDP Guidance

states that where more recent evidence is available this should be used to inform the Evidence Report.

9.125 The Dundee Housing Need and Demand Assessment 2023 ([DED134](#)) has been signed off by the Scottish Government Centre for Housing Market Analysis as being “robust and credible”. The NPF4 figure for Dundee of 4300 covers a 10-year period. This figure reflects levels of house completions in Dundee which have averaged 410 units over the last 5 years. For comparison purposes, in the Dundee Local Development Plan 2019, the Council identified a housing land requirement of 5280 units for a 10-year period and this provides a sensitivity check on the MATHLR figure.

Updated Projections

9.126 The population projections for MATHLR and HNDA are based on 2018 data. No local authority (sub-national) projections were created using 2020 data. The next sub-national population projections based on 2022 data are not expected until early 2025, and household projections are expected mid-year 2025. We will review these projections when they become available.

Indicative Local Housing Land Requirement

9.127 There is a requirement for the Council to settle on an indicative LHLR figure for presenting the Evidence Report the Gate Check stage. Acknowledging that there is an expectation that the figure should exceed the MATHLR, whilst ensuring that the level of delivery is achievable within the plan period and consider the various market factors that might influence build rates. The MATHLR for Dundee is set at 4,300 for the Dundee Area, and it is put forward that an uplift of 430 units (10%) would be justified based on the evidence presented.

	LHLR (10 years)	Estimate of existing and deliverable supply	Difference between MATHLR and estimate of existing supply	Windfall	Potential additional land required (units)
MATHLR	4300	3300	1000	750	250
MATHLR + 5%	4515	3300	1215	750	465
MATHLR + 10%	4730	3300	1430	750	680

Figure 9.16: MATHLR Scenarios

9.128 As demonstrated, and based on historic trends it is anticipated that a large proportion of the LHLR is expected to be met through existing supply carried forward into the next LDP. The current HLA estimates an effective deliverable supply of over 3600 units, and these have been programmed over 10 years.

9.129 An analysis of Dundee’s effective supply since the adoption of LDP2 (2019) demonstrated a 15% decrease in the supply averaged from 2019 – 2024. We have therefore applied an 7.5% decrease to the 2024 figure to cover the remaining 3 audit years to 2028 to arrive at the estimate of existing and deliverable supply figure of 3300 (see calculation in Appendix 2).

9.130 Dundee has historically demonstrated a high contribution of windfall completions. To reflect this but also acknowledge a plan led system a modest allocation of 750 units has been included over the 10-year period. The approach that taken was modest in that 2191 units were delivered over a 10-year period, and we have accounted for 750 units

over a 10-year period, which is over a 65% reduction on what has previously been delivered. There may be a smaller contribution from small sites and constrained sites that may come forward in the plan period, but these are not included within the calculation.

9.131 The site assessment process will prompt the review of existing HLA sites, and non-contributing sites and this will provide an updated evidence-base for inclusion in Evidence Report. Figure 9.16 shows how each scenario would impact upon the allocation of additional land which might be required over the plan period.

9.132 Based on the evidence, it is put forward that a 10% increase on the MATHLR figure would give a LHLR (Local Housing Land Requirement) for Dundee that would be an ambitious yet attainable target. Achieving this increase would involve reviewing the capacity of both existing and new brownfield and greenfield sites, without the need for releasing significant additional greenfield land. Going beyond this 10% increase on the MATHLR would be unrealistic based on historical completions, and would likely necessitate significant new land allocations, potentially requiring substantial release of greenfield land, which goes against NPF4's principles concerning 20-minute neighbourhoods and urban growth.

Consideration of Additional Need

9.133 Dundee HNDA housing estimates range from 4,699 to 6,310 over the next 20 years. The high migration/growth scenario projects a 40% increase in estimated need from the principal scenario. This results in an additional net housing requirement of 81 homes per annum. As stated above, the MATHLR figure for Dundee is 4,300 units over a period of 10 years.

9.134 Homes for Scotland have commissioned a Scotland-wide study (the Diffley Report) ([DED117](#)) on housing need – the approach adopted takes a broader definition of housing need and the survey suggests that 38% of Scottish households have some form of housing need.

9.135 For Dundee, the Diffley Report estimates a form of need in 35% of households which equates to a gross current housing need of 25,400 households. However, as demonstrated in Figure 9.17 below, the net housing need is estimated significantly lower at 10,900.

HNDA Step		%	Approx. No. of Households
x	Gross Current Housing Need		25,400
y	In Situ Solutions Most Suitable		7,300
z	% and Number Able To Buy in Market	40% (x-y)	7,200
A	Net Current Housing Need (Backlog)		10,900

Figure 9.17: Estimate of Net Current Housing Need - Source: Diffley Report (2024)

9.136 The Diffley Report is not an HNDA and takes a much broader definition of housing need than the approach of the Greater Dundee HNDA, including hidden households not facing overcrowding and those struggling to afford their home. The Tayside wide HNDA underwent significant engagement and consultation with stakeholders and was deemed robust and credible by the Scottish Government's CHMA. The HNDA also informed the MATHLR calculation and is therefore the primary evidence in considering housing need.

9.137 The Council carried out a critique of the Diffley Report, and how this has been applied in other localities. After a meeting with the Scottish Government and other organisations, Homes for Scotland issued a response that addressed various planning authorities' concerns. They clarified that the study is not a Housing Need and Demand Assessment (HNDA) and does not determine net housing need; it is merely a starting point. The Council's main concerns include the potential for double counting between existing and future housing needs, inconsistent definitions of overcrowding, house

condition, and affordability, and the reliance on self-reported data. Additionally, the study did not explore issues like debt or mortgage arrears. Consequently, the Council does not accept the survey results as a basis for a definitive figure on existing housing need. Although the Diffley report states it is not meant to provide conclusive numbers, Homes for Scotland has used it to propose an excessive housing need figure. According to HNDA guidance, local authorities can estimate their own existing housing need, provided they have a strong rationale. The Council has opted for the HNDA/MATHLR methodology, which includes the HoTOC figure and is recognised as robust and credible by the CHMA.

Home Ownership

- 9.138 Dundee had the smallest increase in the volume of house sales between 2008 and 2020 at 7.4%. The median house sales value in Dundee (£145,942) was the lowest of all Tayside areas. In Dundee, 45% of households cannot afford a lower quartile market home. Households would need to spend 4.53 times the average local income to afford the average house price – a factor in excess of the typical 3.9 multiplier.
- 9.139 The average house price in Dundee was £137,000 in March 2024 (provisional), similar to the revised figure for March 2023. Across Scotland, the average house price rose by 6.7% over the same period last year. The average house price in Scotland rose by the same percentage (6.7%) to £192,000.

Affordability

- 9.140 The HNDA Survey data estimates that 17% of households in the Dundee area are spending more than 30% of their income on rent/mortgage costs. RSL rents are on average 24% higher than local authority rents with a monthly average of £420 compared to £339. 30% of households cannot afford an RSL rent without subsidy based on a 30% income to rent ratio.
- 9.141 The Covid-19 pandemic has seen housing affordability levels diminish across Dundee, with three times more people stating they are experiencing serious financial difficulties post pandemic. Housing solutions for lower income households need careful consideration as most options, even at entry level, are unaffordable.

Strategic Capacity Considerations

- 9.142 In order to present a robust LHLR, we must consider a range of factors that will impact the capacity of the City to accommodate new housing allocations and the delivery of sustainable places.

Environmental Considerations

- 9.143 In all localities, there are a range of physical constraints that exist and limit growth, as well as environmental considerations. Dundee is one of the most constrained Local Authority areas in Scotland due to its tight administrative boundary. Dundee City Council has a long-sustained history of achieving significant amounts of development on previously developed (brownfield) land. Brownfield land is generally more sustainable but does raise issues such as a need for contaminated land waste in some cases. Dundee's administrative boundaries are such that there exists relatively little quantities of greenfield land and development of such land must therefore be strictly controlled. As the quantity of land being developed increases this can give rise to other effects such as additional flood risk and pollution through increased transportation requirements.

- 9.144 Six water courses run through Dundee some of which are subject to localised flooding. The Flood Plain mainly affects residential and other property at Broughty Ferry, along the River Dighty and at the Central Waterfront. Sustainable Urban Drainage Systems are now a standard feature of new development. There are no major strategic issues with regard to water infrastructure available now or in the foreseeable future.
- 9.145 The entire Dundee City Council administrative area was designated as an Air Quality Management Area in July 2006 and redefined in October 2010. The area was designated in relation to breaches and likely breaches of the Nitrogen Dioxide annual mean Particulate Matter air quality objective in the vicinity of 24 several main junctions within the City.
- 9.146 The City's network of existing open space has been protected, developed and enhanced by targeted improvements. An updated Open Space Audit and Open Space Strategy is currently being progressed with the aim of further improving the network across the City.

Infrastructure Considerations

- 9.147 NPF4 promotes an infrastructure first approach that encourages the facilitation and early adoption of infrastructure within placemaking. This strengthens the development of infrastructure that meet the needs of a place and its communities. Infrastructure capacity in Dundee is considered comprehensively within the Infrastructure First and Local Living Schedule and this will directly inform the spatial strategy.
- 9.148 In relation to transport, sustainable and active travel methods will be supported to enable local living. From a housing perspective, it is important to reduce car dependency and build in infrastructure that eases pressure on the road network. Further information can be found in Sustainable Transport Schedule.

Economic Considerations

- 9.149 According to Scottish Government income estimates for 2018, the median income in Dundee in 2018 was £24,440. It is the lowest median income within the Tayside partner area with the highest being in Perth & Kinross (£30,160). This profile reflects the median income benchmarks which populate the HNDA Tool v4.0 (sourced from CACI Paycheck data).
- 9.150 Between 2014-18, Dundee median household incomes increased by 2% from £23,920 in 2014 to £24,440 in 2018. Analysis of data from the Scottish House Condition Survey (SHCS) 2017-19 reveals that the average income in Dundee was £23,500, which is significantly lower than both Scotland (£29,100) and all other Tayside partner areas.
- 9.151 CACI Paycheck data (2020) sets the median income in Dundee at £24,628 which is slightly higher than both Scottish Government 2018 estimates and SHCS estimates 2019. ONS Annual Survey of Hours and Earnings (2020) suggests a median weekly pay for all employees in Dundee is £460.

Access to Mortgage Finance

- 9.152 Analysis from Bank of England data detailing residential loans provided via the FCA, shows that first time buyer mortgages accounted for 21-24% of all mortgage loans between 2015-22, with a rise of almost 3% taking place between 2019 and 2020. The percentage of home-owners re-mortgaging accounted for 28% of all mortgages in Q4 2021 which is its highest rate since 2017. The Covid pandemic coupled with stricter bank lending requirements on large LTV mortgages have played a role with the figure for 2021 bouncing back to previously seen levels. In Q4 2021, the mean Loan-to-Value

(LTV) ratio on new mortgages to first-time buyers in Scotland stood at 82%, an annual increase of 4.8 percentage points. Meanwhile, the mean LTV ratio for home movers in Scotland stood at 71% in Q4 2021, up 1.4 percentage points on the previous year (Source: UK Finance). Analysis of Bank of Income data on lending multiples reveals that for buyers on a single income, the most consistent lending multiple is 4.0 or over in 2021 (the highest in the 7-year period of data). For joint income borrowers, the most consistent LTV income multiple is 3 or over, representing 43% of all loans in Q4 of 2021. As the affordability calculation in the HNDA Toolkit uses a default LTI of 3.2 this analysis suggests there is no strong case to change this with 3.00 or over LTI (joint income) being the most recurring lending multiplier between 2015 and 2021.

Private Renting

9.153 The Local Housing Allowance across Dundee (£571) averages at 30% less than the costs of market rents (£744) and as a result 6 in 10 households cannot afford to rent privately when applying a 25% income to rent ratio and 5 in 10 cannot afford to rent privately applying a 30% income rent ratio.

9.154 Private rent prices rose to an average of £800 in April 2024, an annual increase of 11.4% from £718 in April 2023. This was higher than the rise in Scotland (10.0%) over the year. According to Citylets, average private rents in Dundee have increased on average by 36.9% in the last three years to 2024 and rents average at £879 at quarter 1 of 2024.

Economic Growth

9.155 Dundee's Gross Value Added (GVA) per head is consistently the lowest of each Tayside partner and at a level of £39,050 sits well below the Scottish average of £52,549.

Employment

9.156 Across Dundee, just under 67,000 people were employed in 2019, and whilst there has been a modest growth (1.7%) since 2009, growth is one of the lowest of Tayside partners and 15% lower than the growth experienced by Perth and Kinross.

9.157 Key industries in Dundee include (i) construction (ii) professional, scientific & technical sectors, (iii) accommodation and food services and (iv) retail which collectively account for half of all employment opportunities in the area.

9.158 Average Dundee weekly pay equals £498 which is the lowest of all Tayside partners and lower than the mean for Scotland (£558). Dundee City has the highest levels of economic inactivity at 27.2% across Tayside in 2019 and also a higher claimant count rate (7.2%) than the Scottish average (6%)

9.159 In 2020, 59 of the 188 (31%) of Dundee data zones were in the top 15% most deprived areas, this was an increase of 4 from the 55 data zones in 2016. There are only three local authorities who have a higher percentage of data zones in the 15% most deprived category.

Site Assessment Methodology

Local Development Planning Guidance

9.160 The Scottish Government's Local Development Planning Guidance sets out the details of the expectations for implementing LDPs and brings together requirements from NPF4 and the Development Planning Regulations. In terms of relevance to a

development site assessment process the Local Development Planning Guidance establishes that;

- Detailed policies and site proposals should not be included in the Evidence Report. Detailed site assessment will not be appropriate at the Evidence Report stage, but the planning authority could usefully establish a site assessment methodology that will be used to appraise sites and inform allocations for the Proposed Plan. This could also be linked or ideally integrated with the approach to SEA assessment.
- Following Gate Check, planning authorities may wish to undertake an optional 'Call for Ideas' consultation to allow all stakeholder to propose ideas and submit sites for consideration. The expectation of a 'Call for Ideas' consultation is to allow stakeholders to submit suggestions for proposed ideas and is not limited to proposing development sites or proposing a specific type of development. It is expected that proposals submitted would support the preparation of the spatial strategy within the Proposed Plan.
- All sites should be assessed using the site appraisal assessment methodology that was considered at the Evidence Report and Gate Check Review. The site assessment should cover (i) sites allocated in the current local development plan; (ii) sites proposed through any call for ideas; and (iii) any other sites the planning authority considers may have potential.
- No sites should automatically roll forward from one plan to the next without being assessed. All sites proposed to be allocated for the development in plans should have been assessed for their deliverability through the site assessment process.
- The site selection process should take an infrastructure first approach.
- De-allocations should be considered where sites are no longer deliverable.
- NPF4 is a key consideration. It is expected that planning authorities will use the framework's policies to support the development of their spatial strategy.

Strategic Environmental Assessment and Strategic Flood Risk Assessment

9.161 The Local Development Plan is a qualifying plan that requires a strategic environmental assessment (SEA) under the Environmental Assessment (Scotland) Act 2005. The SEA will consider the environmental effects of the plan's spatial strategy, policies and site allocations. It will also consider how negative effects could be avoided or mitigated and how positive effects could be enhanced. The draft SEA scoping report has been submitted to the SEA Gateway Group for comment and will be finalised for submission as part of the Evidence Report.

9.162 The Strategic Flood Risk Assessment (SFRA) is to provide a high-level appraisal of the extent and nature of flood risk from all sources. The Water Environment topic paper includes the evidence and data that will inform the preparation of the SFRA. The SFRA and SEA will inform the level of current and future flooding and the suitability of these sites in terms of flood risk.

Site Assessment Methodology

9.163 The Council will take into account sites that already benefit from planning permission and identify other sites that have the potential to accommodate appropriate development for the benefit of the City.

9.164 To achieve this a Development Site Assessment survey of land and buildings will be undertaken to assess development potential and deliverability. Using the survey information and taking account of other matters, decisions will be made as to which land to allocate for development in the Proposed Plan. The extent of survey necessary will vary depending upon the characteristics of a location: A brownfield site with existing planning permission may require less detail than a location with no history but at the conclusion of the process there should be confidence that the information gathered is

sufficient to make an informed decision on whether to designate somewhere for development.

9.165 In addition to technical characteristics of a site, decisions must also consider whether designating a site would be in accordance with the policies and aims of the National Planning Framework and other plans and policies etc as well as being reviewed as part of the Strategic Environmental Assessment. Accordingly, achieving a high confidence through the Development Site Assessment process does not guarantee a site will be allocated.

9.166 In preparing the Proposed Plan, the Council propose four stages to the development site assessment.

Stage 1: Information Gathering

9.167 (In previous Local Development Plans this has included what has been referred to as a “Call for Sites”). Dundee City Council will collate together a list of all known land with development potential. This list is generated from sites already known to the Council as well as those suggested by communities and commercial interests during the “Calls for Ideas” consultation. Technical information is then collated for each site on that list.

Stage 2: First Sieve

9.168 The list is assessed to remove any sites that are unsuitable for development. Some sites may be restricted at this point for consideration only for particular uses – e.g. for industrial use if already surrounded by similar use.

Stage 3: Detailed Assessment of q (Second Sieve)

9.169 The list is assessed to check if the sites can actually be developed – this may lead to conclusions that the site:

- a) Can be fully developed
- b) Only part of the site can be developed
- c) Cannot be developed and should be removed from the list

9.170 The assessment will include consideration of both physical aspects of the site and how well the site complies with National Planning Framework 4.

Stage 4: Detailed assessment

9.171 With confidence that a site (or part of) can be physically developed this stage then includes measuring the capacity of the site and understanding the financial, environmental, infrastructure and resource demands of each site.

9.172 The high-level assessment (Stages 1 to 3) is intended to be undertaken as part of the wider Local Development Plan process to rule out unsuitable sites that are not reasonable options for development. For sites considered to be reasonable options for inclusion in the plan the below assessment will be carried out from information known and from information submitted through the Call for Sites process.

9.173 The pro forma sets out site assessment questions covering the issues the Key Agency Group wish to be addressed and link the site appraisal and SEA process. Dundee City Council will use this in devising site assessment questions appropriate for use in Dundee. It is proposed that the below scoring criteria, as set out by the SEA consultation authorities, will be used in scoring potential effects through the SEA process:

++	+	0	?	+/-	-	--
Significantly positive	positive	neutral	Unknown	positive & negative	negative	Significantly negative

Site Checklist and Site Assessment

9.174 The site checklist is included as Appendix 3.

Spatial Strategy

Current Spatial Strategy

9.175 The spatial strategy for housing set out in the Dundee LDP 2019 was established by TAYplan 2016-2036 and set a strategic housing supply target of 6340 units. The LDP 2019 encouraged the delivery of more homes across the City, including significant development within the Strategic Development Area at the Western Gateway as well as the redevelopment of housing sites in regeneration areas such as Hilltown and Whitfield.

9.176 In accordance with the TAYplan Strategic Development Plan the LDP 2019 set the delivery of the housing supply target for Dundee City at a ratio of 25% affordable homes to 75% market homes. The LDP spatial strategy and policy approach will help to meet the Local Housing Strategy outcomes through improvements to the quality, affordability and choice of housing across tenures and markets. This was through the allocation within the Local Development Plan of a range of housing sites across the City to support the delivery of a variety of affordable housing types and tenures.

9.177 Furthermore, the Local Development Plan strategy supports the delivery of affordable housing within the City through enabling the continued partnership working with the Scottish Government, affordable housing providers and developers and by guiding the managed release of surplus Council owned land through the Council's programme of land disposal.

9.178 The strategy for identifying additional land to meet the housing land requirement is to prioritise the reuse of brownfield land within the existing urban area. Greenfield land allocations at Baldragon and Linlathen were carried forward from the Dundee LDP 2014. To further support the growth of Dundee, the indicative capacity of the Linlathen allocation increased with an additional release of greenfield land in the northeast at Ballumbie and the west at the Western Gateway. The additional greenfield land release at the Western Gateway is phased over the first 5-year period (2019-2024) and the second 5-year period (2025-2029) of the Plan. The land release at the Western Gateway was to support the continued delivery of what was a Strategic Development Area and together with the other housing land allocations to provide flexibility and choice in Dundee's housing market for house builders and occupiers. To ensure the housing strategy is delivered, the development of brownfield land must be carefully managed to ensure that the benefits of new developments are fully realised.

9.179 Under the Planning (Scotland) Act 2019 Strategic Development Plans will no longer be produced but groupings of authorities will instead identify the need and proposed locations for strategic development through the preparation of Regional Spatial Strategies. An indicative Regional Spatial Strategy for the Tayside area has been produced and was submitted to the Scottish Government to inform NPF4.

NPF4 Requirements

- 9.180 NPF4 contains a national spatial strategy that guides decisions on development proposals and aims to introduce new concepts such as “just transition”, “conserving and recycling assets,” “local living,” “compact urban growth”, “rebalanced development”, and “rural revitalisation.”
- 9.181 These will be guiding principles in the adoption of our local spatial strategy and will influence how settlement options are considered. In terms of housing, local living, and compact urban growth is in line with limiting greenfield expansion where appropriate. Consideration will be given to sustainable, liveable places and higher density options will be supported where these support transport, local living and meet housing needs.

Future Spatial Strategy

- 9.182 The resulting spatial strategy will be largely developed based on existing allocations and capacities, whilst taking into account the constraints that exist in settlements across the local authority area. Whilst we appreciate that new housing offers benefits in relation to housing choice, addressing need and household growth we recognise that finding viable plots that deliver growth in the area is becoming increasingly difficult.
- 9.183 It is recognised that some of the housing need could be met through a variety of means such as addressing under-occupancy in existing homes; bringing empty homes back into use and regeneration of existing buildings. However, a significant part of meeting the net current housing need will be through the delivery of new homes.
- 9.184 There is potential for the LDP review to promote higher density housing options and ensure connection to existing communities in terms of layout, density and mix, landscape and scale. The LDP review will demonstrate a commitment to continued growth and will look to support initiatives such as town centre living, local living, and a place-based approach to development which aligns with NPF4.

Summary of Stakeholder Engagement

- 9.185 As part of the preparation of the Evidence Report for the Local Development Plan, Dundee City Council undertook targeted engagement on the Quality Homes and Site Assessment Methodology topic paper (DER009). This consultation ran from the 12th September to 24th October 2024 and focused on gathering feedback from stakeholders including key agencies, housing developers, planning agents, and community groups.
- 9.186 Feedback was received from a range of stakeholders including Homes for Scotland, Historic Environment Scotland, SEPA, NatureScot, Taylor Wimpey, and Dundee Civic Trust. The Council provided detailed responses to each submission, clarifying the evidence base, updating datasets (e.g. HLA 2024), and refining the Site Assessment Methodology to align with the Key Agencies Group (KAG) template and SEA requirements. Five formal statements of dispute were recorded during the Topic Paper engagement stage.
- 9.187 The Council engaged with all parties who submitted representations and provided a Council in response. Homes for Scotland and Dundee Civic Trust confirmed that they wished to progress their respective matters of dispute to Gate Check stage. Hallam Land (STA023), Taylor Wimpey (STA050) and Kirkwood Homes Ltd (STA016) did not respond to the Council’s response on matters that were raised as a dispute and so the Council have also progressed their comments as a formal dispute. The matters of disputes relate to the calculation of the LHLR in the absence of an updated Local Housing Strategy and the consultation process for the Site Assessment Methodology. These have been acknowledged and addressed in detail in the Evidence Report Dispute and Agreement section.

9.188 This engagement has directly informed the finalisation of the Schedule within the Evidence Report, ensuring that the approach to housing matters and site assessment is robust, transparent, and aligned with national guidance.

9.189 The following table summarises the comments received along with the Dundee City Council (DCC) response.

Respondent	Summary of Comments & DCC Response
NatureScot (STA032)	Agree broadly with the evidence presented. Invited consideration of the site assessment methodology approach, with a recommendation that we use the SEA Site Assessment Proforma to give a thorough and holistic analysis of sites. DCC Response: Comments received regarding the SAM were noted and amendments were made to more closely reflect the KAG site assessment proforma template, linking closely with the SEA also and in cognisance with HfS draft SAM.
Taylor Wimpey (STA050)	Raised issues with Dundee's Local Housing Strategy (LHS) being out of date. Requested confirmation in Topic Paper that the Housing Land Requirement will exceed the Minimum All Tenure Housing Land Requirement. DCC Response: Regulation 9 of the Local Development Plan Guidance states that Local Authorities must have regard to any local housing strategy (LHS). The Council's Evidence Report summarises the current LHS, and this has been submitted as evidence whilst the emerging LHS is in preparation under separate legislative requirements. The Planning Service have worked closely with the Housing Department in both gathering relevant and current evidence for the Schedule within the Evidence Report as well as in the drafting of the LHS. It has been clarified in the NPF4 section of the Schedule that the Local Housing Land Requirement to exceed the MATHLR. DCC is proposing a 10% uplift on the MATHLR, and the methodology is presented in Appendix 2.
Historic Environment Scotland (STA004)	Agree broadly with the evidence presented. Invited consideration of the site assessment methodology approach, with a recommendation that the Council use the SEA Site Assessment Proforma to give a thorough and holistic analysis of sites. Also highlighted the role HES will continue to play in Development Management process. DCC Response: Comments received regarding the SAM are noted, amendments have been made to more closely reflect the KAG site assessment proforma template, linking closely with the SEA also and in cognisance with HfS draft SAM. Comments noted with regards to DM processes.
Kirkwood Homes Ltd (STA016)	Raised issues with Dundee's Local Housing Strategy (LHS) being out of date. Requested confirmation in Topic Paper that the Housing Land Requirement will exceed the Minimum All Tenure Housing Land Requirement.

	Challenged the Council's approach to windfall development. DCC Response: Regulation 9 of the Local Development Plan Guidance states that Local Authorities must have regard to any local housing strategy (LHS). The Council's Evidence Report summarises the current LHS, and this has been submitted as evidence whilst the emerging LHS is in preparation under separate legislative requirements. The Planning Service have worked closely with the Housing Department in both gathering relevant and current evidence for the Schedule within the Evidence Report as well as in the drafting of the LHS. It has been clarified in the NPF4 section of the Schedule that the Local Housing Land Requirement to exceed the MATHLR. DCC is proposing a 10% uplift on the MATHLR, and the methodology is presented in Appendix 2. The approach that has been taken to windfall completions was modest in that 2191 units were delivered over a 10-year period, and we have accounted for 750 units over a 10-year period, which is over a 65% reduction on what has previously been delivered. We are satisfied that this is an appropriate level of windfall provision over the lifespan of the LDP.
Hallam Land (STA023)	Queried the lack of inclusion of Housing Land Audit 2024, and previous audits to be contained in Topic Paper. Raised issues with Dundee's Local Housing Strategy (LHS) being out of date. Stipulated that a need for affordable housing policy requires to be presented. DCC Response: Updated the Schedule to include HLA 2024 and associated data. Also included a link to the DCC HLA website showing all available audits. Regulation 9 of the Local Development Plan Guidance states that Local Authorities must have regard to any local housing strategy (LHS). The Council's Evidence Report summarises the current LHS, and this has been submitted as evidence whilst the emerging LHS is in preparation under separate legislative requirements. The Planning Service have worked closely with the Housing Department in both gathering relevant and current evidence for the Schedule within the Evidence Report as well as in the drafting of the LHS. It has been clarified in the NPF4 section of the Schedule that the Local Housing Land Requirement to exceed the MATHLR. DCC is proposing a 10% uplift on the MATHLR, and the methodology is presented in Appendix 2. The Council recognise that the supply of Council owned land to support the current approach to delivery of affordable housing is finite and therefore consideration will be required as to the most effective delivery mechanism that will support the delivery of affordable housing in future years. As part of the submission to Gate Check the Council outline in the Evidence Report the policy implications with continuing the current mechanism and the reasoning for

	the potential implementation of an affordable housing contribution policy during the preparation of Proposed Plan. This will allow for further opportunities for consultation and engagement on the Council's identified approach to affordable housing.
Dundee Civic Trust (STA017)	Requested additional data on empty homes and vacant buildings. Queried approach to windfall development and self-build. Raised issues with SAM. Stipulated need for affordable housing policy. DCC Response: Advised that the purpose of the Evidence Report is to collate, analyse and interpret available evidence from established sources, rather than to commission or generate entirely new datasets. The approach that we have taken to windfall completions was modest in that 2191 units were delivered over a 10-year period, and we have accounted for 750 units over a 10-year period, which is over a 65% reduction on what has previously been delivered. We are satisfied that this is an appropriate level of windfall provision over the lifespan of the LDP. The Evidence Report will accurately reflect the current self-build register data that exists and is maintained in accordance with the Planning (Scotland) Act 2019. While we cannot create a new system of data collection at the Evidence Report stage, we will note the potential benefits of a more accessible approach for consideration in the future. The Evidence Report reflects currently available data on housing tenures such as the Housing Needs and Demands Assessment, and student accommodation has not been categorised in this way. We will note in the Evidence Report that there is a potential gap and give consideration to this approach in future housing analysis or Call for Ideas stage of LDP process. As part of the submission to gate check the Council will outline in the Evidence Report the policy implications with continuing the current mechanism and the reasoning for the potential implementation of an affordable housing contribution policy during the preparation of Proposed Plan. Please be advised that there will be further opportunities for consultation and engagement on our identified approach to affordable housing.
SEPA (STA002)	Agree broadly with the evidence presented. Invited consideration of the site assessment methodology approach, with a recommendation that the Council use the SEA KAG Site Assessment Proforma to give a thorough and holistic analysis of sites. DCC Response: Comments received regarding the SAM were noted, amendments have been made to more closely reflect the KAG site assessment proforma template, linking closely with the SEA also and in cognisance with HfS draft SAM.
Homes for Scotland (STA047)	Raised issues with Dundee's Local Housing Strategy (LHS) being out of date. Highlighted need to justify considering an

	affordable housing approach for Dundee. Invited consideration of HfS Site Assessment Methodology. Queried approach to windfall development. DCC Response: Regulation 9 of the Local Development Plan Guidance states that Local Authorities must have regard to any local housing strategy (LHS). The Council's Evidence Report summarises the current LHS, and this has been submitted as evidence whilst the emerging LHS is in preparation under separate legislative requirements. The Planning Service have worked closely with the Housing Department in both gathering relevant and current evidence for the Schedule within the Evidence Report as well as in the drafting of the LHS. It has been clarified in the NPF4 section of the Schedule that the Local Housing Land Requirement to exceed the MATHLR. DCC is proposing a 10% uplift on the MATHLR, and the methodology is presented in Appendix 2. The Council recognise that the supply of Council owned land to support the current approach to delivery of affordable housing is finite and therefore consideration will be required as to the most effective delivery mechanism that will support the delivery of affordable housing in future years. As part of the submission to Gate Check the Council outline in the Evidence Report the policy implications with continuing the current mechanism and the reasoning for the potential implementation of an affordable housing contribution policy during the preparation of Proposed Plan. This will allow for further opportunities for consultation and engagement on the Council's identified approach to affordable housing. HfS were consulted during the initial Topic Paper stage, and the revised Site Assessment Methodology was attached to the email. Provided a detailed breakdown of approach to windfall development.
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Summary of Implications for the Proposed Plan

- 9.190 There is a national commitment to increasing house building levels and providing sufficient land to meet housing needs. The aim of LDP review is to set out where housing developments will take place in a transparent way to ensure that successful places can be created and positively impact upon Dundee.
- 9.191 Access to good quality housing is a key component of quality of life within our communities. To continue to deliver this it is important to ensure an effective and generous supply of land for housing is available at all times and to provide for a balance and choice in the type, size, tenure and location of housing within the City.
- 9.192 The Local Development Plan seeks to encourage a design-led approach to sustainable, high-quality placemaking, with the purpose of achieving quality residential environments through delivering new housing and in guiding the changes to existing homes and residential areas. The aim is to create places that complement the distinct character and identity of the different parts of the City and promote an integrated mix of

land uses, including well-designed, energy efficient homes of different types and tenures.

Summary of Population, Households and Housing Stock

- 9.193 Dundee has experienced a 2.5% increase in the number of households between 2008-2018 in Dundee, which is the smallest change in the Tayside area. Dundee is expected to have a 4% increase in the number of households between 2021 and 2043, which could stretch to 6% if there is high migration.
- 9.194 The outcomes of household projection scenarios create an estimate of new households emerging in the Dundee region over the next 20 years of between 2,449 using the principal household projections and 4,060 using the high migration/growth scenario. The HNSA Survey data estimates that 17% of households in the Dundee area are spending more than 30% of their income on rent/mortgage costs. RSL rents are on average 24% higher than local authority rents with a monthly average of £420 compared to £339. Subsequently, 30% of households cannot afford an RSL rent without subsidy based on a 30% income to rent ratio.
- 9.195 The Covid-19 pandemic has seen housing affordability levels diminish across Dundee, with three times more people stating they are experiencing serious financial difficulties post pandemic. Housing solutions for lower income households need careful consideration as most options, even at entry level, are unaffordable.

Performance of Policy Interventions in Dundee

- 9.196 Dundee has undertaken a range of large-scale regeneration projects across the city in terms of housing in Mill O'Mains, Whitfield, Lochee and Hilltown. These key regeneration areas have made significant contribution to the provision of high-quality homes in Dundee, with a desirable housing mix. The planned regeneration has guided development in these areas and proved successful as a mechanism for delivering quality environments through a masterplan approach.
- 9.197 The City Development Department prepared Site Planning Briefs to guide future development on specific development sites and Development Frameworks for Strategic Development Areas such as the Western Gateway.
- 9.198 The Council have published the Dundee City Centre Strategic Investment Plan 2050 (CCSIP) ([DED067](#)) with an ambition to double the resident population living in and around the city centre, ensuring that a diverse range of people and families choose to live in the heart of the city, supported by key services. The CCSIP encourages high-density development and design to improve and redefine our city centre to create liveable neighbourhoods. The CCSIP highlights the value of long-term planning, and integrates interventions such as reuse, repurposing and redevelopment to deliver homes and create better places.

Affordable Housing

- 9.199 The Council recognises the importance of addressing affordable housing needs, whilst maintaining development viability and economic growth. We recognise that there is a finite amount of DCC-owned land to support the current approach. Consideration is required as to whether there is an evidence-base to support the formation of an Affordable Housing Policy and the potential impacts this could have on economic growth, development viability and overall house building in the city.

9.200 Consideration for Implementation: The following provides a broad summary of information gathered around affordability of housing in Dundee:

- The highest level of new affordable homes since 2006 has been recorded in Dundee in 2024, with completions over the past year outnumbering private homes in the city, according to the latest figures.
- The annual Dundee Housing Land Audit for 2024 revealed that 483 homes were completed, comprising 282 units (58%) for social rent and 201 (42%) private housing
- Around 83% of the completions in 2023/24 were on brownfield land and 17% were greenfield completions.
- Dundee's average house price is £135,000 (January 2025) and is lowest of all city authorities in Scotland, as well as the lowest in Tayside. The national average house price was £187,000. (Source, ONS).
- The 5-year average (%) for affordable housing delivery in Dundee is 26.9% but this includes two audit years when 0 affordable completions were recorded (2020 and 2021). An analysis of 10-year completions (2015-2024) revealed that Dundee has delivered 31% affordable units without an affordable housing policy in place.
- Audit of other localities revealed that Dundee is delivering higher than Angus with a policy intervention in place, and at a similar level to Perth & Kinross and Edinburgh
- Dundee has delivered 1129 affordable housing units since 2015
- The HLA data reveals that the city has a pipeline of 625 affordable homes (DCC + HA) with planning permission or under construction
- The Council's annual Strategic Housing Investment Programme (SHIP) identifies additional pipeline sites at the initial stages that are not yet part of the statutory planning process. These sites are anticipated to be brought forward in the future and will contribute to maintaining a pipeline of grant funded affordable homes.
- The cost-of-living crisis (including an increase in mortgage costs and rents), is driving an increased need for affordable housing.
- The Scottish Government announced a national housing emergency in May 2024
- Scottish Government funding for affordable housing was cut by 25% for 2023/24

9.201 In addition to the data above, the Council will undertake research to ascertain if an affordable housing policy requiring the delivery of affordable homes is appropriate across the city and would consider;

1. Housing Need Assessment
 - Detailed analysis of current housing waiting lists
 - Demographic breakdown of housing need
 - Evidence on the specific types of affordable housing in demand
2. Economic Viability
 - Assessment of feasibility across different sites (i.e. brownfield/greenfield), locations (i.e. city centre, Dundee Waterfront) and scales (i.e. minimum site size or units)
 - Impact on land values, development costs and housing supply
 - Comparison with other Scottish cities
 - Exploration of the impact of reduced funding from Scottish Government
3. Financial Considerations
 - Cost/benefit analysis of implementation of policy
 - Resource implications for the Council of applying a developer contributions approach
4. Engagement

- Continued partnership with local housing associations and private developers
- Alignment with NPF4, LDP as well as Local Housing Strategy and Strategic Housing Investment Plan

9.202 Potential Approaches: The introduction of an affordable housing policy would need extensive consideration based on the assumption that a need was identified at Proposed Plan stage. If progressing, a delivery mechanism would also need to be considered and established and there is a range of policy approaches and options that may be considered, such as:

9.203 Exemptions Framework: Develop a comprehensive implementation strategy to comply with NPF4 Policy 16. This could act as a blanket policy across all private residential development proposals, but policy could provide a list of exemptions that would need to be demonstrated through the application process. This approach would rely on a clear policy approach being developed for qualifying sites and exemptions.

9.204 Potential exemptions could include locations (i.e. Dundee Waterfront), small-scale developments or specific housing types (self-build, PBSA etc.), or projects with viability challenges.

9.205 Developer Contribution Model: This approach can be implemented on a site-by-site basis and negotiated through pre-application discussion to consider local housing need or site characteristics. Alternatively, this approach could implement a mandatory percentage of affordable housing in new residential developments. The assessment criteria would need to provide some flexibility in relation to contributions and could be a mechanism to incentivise affordable housing provision (e.g. Residential developments comprising wholly social rented properties are exempt from most developer contributions to support their viability).

9.206 Land Release Strategy: The assessment criteria would be set out in the Local Development Plan and be negotiated on a site-by-site basis. Could be an opportunity to explore a diversified land acquisition strategy to expand beyond council-owned land for affordable housing delivery (e.g. partnering with private landowners, compulsory purchase options on strategic sites).

9.207 Strategic Site Allocation: Could explore the viability of designating sites in the LDP specifically for affordable housing and/or create policies which incentivise affordable housing provision. At Proposed Plan stage consideration will be required to give regard to the resource implications of administering an affordable housing policy and evaluate this against the benefits the policy would bring. Existing practice across planning authorities indicates that there is a significant resource requirement for administering a developer contribution based affordable housing policy. For the Council this would likely require a dedicated team across a range of services. The Council would need to consider flexible policy wording that is appropriate to meet the needs of the local people, whilst ensuring this does not negatively impact upon site density and viability.

9.208 Next Steps: Through the emerging Local Housing Strategy and to inform the Proposed Plan the Council will seek to commission an independent review during 2026 to consider the feasibility of introducing a Dundee specific Affordable Housing Policy. This review will evaluate affordable housing policies implemented across Scotland, identify best practice models, and assess current practices within Dundee. It will explore the feasibility of introducing a Dundee-specific Affordable Housing Policy, considering the benefits and limitations of various approaches. The findings will directly inform the development of the Local Housing Strategy (LHS), Strategic Housing Investment Plan (SHIP), and the review of the Local Development Plan (LDP). This integrated evidence base will support a future delivery model that responds effectively to Dundee's affordability challenges, land supply constraints, and growing housing need. At Proposed Plan stage a draft policy framework will be prepared and engagement with key stakeholders will provide opportunity for consideration and comment. The approach

will be strategic and formed upon evidence-based decision making, economic viability and the diverse housing needs of Dundee.

Student Accommodation

9.209 A current analysis of Purpose Built Student Accommodation (PBSA) in Dundee has revealed that a significant development pipeline has been established, with a number of units under construction, approved or pending decision. To ensure that there is not an oversupply of this type of accommodation future proposals will need to demonstrate that there is a need in the area for the accommodation proposed. It is likely that we will continue to need a policy approach to manage PBSA in Dundee and have the flexibility to promote in suitable locations i.e. brownfield, or re-use of existing building to promote regeneration objectives.

HMO / Co-Living

9.210 The NPF4 policy suite does not reflect the HMO market in Dundee, HMOs provide an important supply of housing within Dundee for a range of different people. Whilst many of the concerns relating to HMOs can be more appropriately managed through the licensing regime, there are a number of land use issues that HMOs proposals can raise due to increased number of residents such as increased pressures on parking, amenity space and refuse facilities. In order to avoid an excessive concentration of HMOs within a particular area thresholds have been applied to HMO unit numbers within the census output areas and there is an existing policy approach in the LDP 2019. A Proposed Plan implication will be consideration of the need for continuing this policy approach into the LDP Review. In terms of co-living there is no specific policy within NPF4 and so consideration will be given to a Dundee approach to ensure the delivery of high quality development proposals with suitable levels of amenity are brought forward.

Housing for Older People

9.211 Dundee has a proportionately higher level of housing for older people than many other Scottish Local Authorities. Though there have been programmes to decommission sheltered housing, there is still evidence of low demand for some types. The increased provision of alarm services and other community care services have diminished the demand for traditional sheltered housing. The Council and its partners will continue to rationalise specialist housing for older people. As a result of this, it is not envisaged that there is a requirement for significant new development of specialist housing for older people. However, there may be need for higher dependency housing, as well as the flexibility for housing to be adapted to meet the needs of older people based on assessments with the Dundee Health and Social Care Partnership.

9.212 The current LHS sets out an ambition to improve housing quality of private rented sector tenants, especially the elderly and those vulnerable to adverse living conditions. This will remain a priority in the upcoming Local Housing Strategy, as will the consideration and needs of this demographic.

Housing for Disabled People

- 9.213 As set out in the Dundee Local Housing Strategy (2019), the Dundee Health & Social Care Partnership identifies housing service development targets for individuals who require care and support or physically adapted housing, such as a wheelchair adapted house, to live independently in their respective communities. This includes physical disabilities, mental health and well-being and learning disability and autism. Within the LHS, the Community Care Action Plan provides a baseline, target and timescale for the delivery of suitable accommodation to meet the specific needs of residents.
- 9.214 Within Dundee City there is a large demand for wheelchair adapted housing, the requirements are considered in every new build social rented development. Since 2015 there has been 45 new build social rented wheelchair units either completed or currently under construction in the City, there are also a further 137 proposed wheelchair units for future developments identified in the Strategic Housing Investment Plan (SHIP) 2019 – 24.

Housing for Gypsies and Travellers

- 9.215 Dundee is projected to have a substantial surplus in site provision, at around 55 to 60 pitches over the next 5 years (an average of 11 – 13 pitches per annum). This surplus is in part a reflection of the relatively limited need for accommodation within the City. The LHS will make a commitment to engaging with this community to ensure that their needs are met in the locality, and provision can be reviewed as required.

Self-build

- 9.216 The Dundee City Council Self-build Register ([DED396](#)) that is hosted online has so far seen limited interest from parties seeking to register with only 3 people so far on the register. It is relatively early for that register to take into account actual levels of interest. The Council's LHS seeks to explore self-build as an alternative delivery model and will assess whether demand in the city would prompt a policy to encourage the supply of self-build homes. The Council will also explore the potential to consider self-build and Masterplan Consent Areas. Other factors such as access to self-build finance, land and building materials are other factors that may currently be influencing a lower interest in self-build housing within the city at the current time.

Short Term Lets

- 9.217 The proposed plan should consider the spatial distribution of short-term lets and determine whether there is a need to designate a Control Area in Dundee. As a minimum, the planning authority should consider amenity implication at proposed plan stage. At the time of drafting, there were 224 STL applications for licencing and 31 applications for planning permission. Whilst the number of applications for planning permission are low, we anticipate an increasing as applicants become aware of the requirement for planning permission.

Windfall sites

- 9.218 The urban nature and the ongoing regeneration within the city has resulted in windfall sites making a sizeable contribution to the supply of land for new housing in

Dundee. As such, it may be appropriate to state that the Council are supportive of windfall sites coming forward on brownfield sites, where appropriate.

Development Site Assessment

9.219 The Council intends to use a development site assessment checklist as part of the site assessment process. The site assessment methodology provides a high level overview of the process, and the development site information checklist will be further customised to reflect the evidence required to prepare the new LDP and to ensure that it is fit for purpose. As part of the preparation of the Proposed Plan the draft site assessments will be circulated to statutory and internal consultees to add knowledge from their specialist remits. This information alongside the SEA will allow for the determination on the suitability of sites for inclusion in the LDP. All sites that may be deemed suitable for inclusion in the LDP review will be subject to further assessment to ensure that they are deliverable and effective. Landowners and developers will be required to complete an effectiveness and delivery checklist as part of the development site assessment process.

Summary

9.220 The implications of the evidence for the Proposed Plan can be summarised as follows:

- Dundee has experienced minimal population growth at 2% between 2000-2019. In terms of population projections, the population in Dundee is set to change by less than 1% across the period 2018-43. Despite the population of Dundee remaining flat overall there will still be changes to demographics with a 12% increase of people of pensionable age and an 8% decrease in children. Over a 25 year period, a 5% increase in the number of households is projected and this is consistent with Scotland average, where households are increasingly fragmented and made up of fewer people. The review of the LDP will need to address these demographic changes through its spatial strategy.
- The indicative LHLR has been set at 4730, a 10% uplift on the MATHLR, reflecting an ambitious but achievable approach to growth based on the aspirations of the area, whilst recognising the significant environmental and infrastructure constraints that exist locally. The LDP review will have to undertake robust Site Assessment Methodology to ensure that sufficient land and site allocations are deliverable over the plan period to meet the LHLR.
- The current HLA indicates that there is a substantial existing supply of housing land (3888 units of which 3607 are programmed as deliverable). There is an expectation that a significant proportion of this supply can be carried forward to the LDP review; however, the deliverability of these sites will be reassessed as part of the site assessment process. This will inform the evidence base to determine the scale of new housing allocations required.
- The 2021 HNSA calculation shows that between 48%-58% of households in Dundee City will require social housing to meet future housing need (in the region of 2700 – 3000 new homes). A further 11-14% would benefit from below market housing solutions. The LDP review will have to take this into account in addressing the need for an affordable housing policy, and if required setting the percentage of affordable housing required.
- Due to the current availability of land, the future housing strategy of the LDP review will build upon the existing approach. Various potential methods for managing additional growth have been identified, including a focus on brownfield sites,

gradual expansion into greenfield areas, or large-scale strategic redevelopment. These choices will be guided by the principles of NPF4, which include compact growth, local living, and prioritising infrastructure, along with a variety of local considerations and constraints.

- The site assessment methodology will directly inform the content of the Delivery Programme through identifying deliverable sites and consideration of infrastructure requirements. Monitoring of future completions and land availability will also be aligned with the Housing Land Audit and the Strategic Housing Investment Plan.

Statements of Agreement / Dispute

Statements of Agreement

9.221 As outlined within the Summary of Stakeholder Engagement, a significant level of engagement was carried out with multiple stakeholders during the consultation and post consultation on the topic paper. The following organisations agree with the evidence base presented:

- NatureScot (STA032)
- Historic Environment Scotland (STA004)

Statements of Dispute

9.222 The Topic Paper consultation has highlighted the following areas of dispute. The Council provided an opportunity to comment on the Quality Homes and Site Assessment Methodology Topic Paper. Thereafter all comments received were considered and correspondence was issued to stakeholders to confirm where amendments had been made and clarify key points. This was constructive in reaching agreement on the vast majority of disputes. The remainder of this section will discuss the formal disputes that are to be progressed to Gate Check.

9.223 The Council engaged with all parties who submitted representations and provided a Council response. Homes for Scotland and Dundee Civic Trust confirmed that they wished to progress their respective matters of dispute to Gate Check stage. Hallam Land (STA023), Taylor Wimpey (STA050) and Kirkwood Homes Ltd (STA016) did not respond to the Council's response on matters that were raised as a dispute and so the Council have also progressed their comments as formal disputes.

9.224 The nature of the disputes from the following parties raised similar matters and have therefore been grouped together to avoid repetition and for a consistent response to the matters raised.

Summary of Disputes from Homes for Scotland (STA047), Hallam Land (STA043), Kirkwood Homes Ltd (STA016), Taylor Wimpey (STA050)

- Dispute any approach to proceed to gate check stage and formulate an indicative LHLR without an up-to-date Local Housing Strategy in place
- Need for Affordable Housing Policy should be fully justified at Evidence Report stage
- Dispute any attempt to form a Site Assessment Methodology without robustly engaging with HFS and members
- Require confirmation that the Local Housing Land Requirement (LHLR) will exceed the Minimum all Tenure Housing Land Requirement (MATHLR)

- Query approach to inclusion of windfall development
- Housing Land Audit 2024 data should be included

DCC Response

- 9.225 The Evidence Report summarises the current LHS and Regulation 9 of the Local Development Plan Guidance requires that Evidence Report's to "have regard to" the LHS, rather than making the Evidence Report contingent upon its completion. The approach taken satisfies this requirement and acknowledges the importance of the LHS to housing delivery. The Proposed Plan stage will be fully informed by the finalised updated LHS, and through the drafting of the Evidence Report it has been ensured there is alignment between the two documents.
- 9.226 The Council have provided an evidence-based approach on how the indicative LHLR has been calculated, including how the target is to achieve this over the plan period. Further clarification is given in Appendix 2 with a breakdown of the calculation presented. The Schedule clarifies that the indicative LHLR will exceed the MATHLR as the Council are proposing a 10% uplift on the MATHLR as described in Appendix 2.
- 9.227 With regards to windfall evidence as described in the Schedule the historic delivery was 2,191 units on windfall sites over 10 years. The current assumption that has been factored into the calculation is 750 units over 10 years (a 65% reduction), which is considered a modest and appropriate allowance for the LDP period and presents a plan led system that promotes allocated housing sites but at the same time recognises that windfall sites will continue to make a contribution to the housing supply and delivery within the city.
- 9.228 In terms of the need for an affordable housing policy being considered – the Schedule sets out that the Council recognises the finite supply of Council-owned land and the ability to provide this for affordable housing will be more limited over the Plan period as this supply is finite. The Evidence Report outlines Proposed Plan implications of continuing the current approach and the rationale for potentially introducing an affordable housing contribution policy at Proposed Plan stage. This will allow further consultation and engagement and working in partnership through the Local Housing Strategy process.
- 9.229 The Council note that Homes for Scotland and members comments that there has not been the opportunity to comment on the revised Site Assessment Methodology. Homes for Scotland were consulted during the initial Topic Paper stage, and the revised Site Assessment Methodology was attached to the email on 26th March titled "DCC Response – Quality Homes and Site Assessment Methodology Topic Paper" and no further comments regarding the SAM were received. The Council are proceeding to Gate Check with the revised SAM which closely reflects the KAG site assessment proforma and links closely with the SEA and also informed by the draft Homes for Scotland SAM.

Dundee Civic Trust

1. Request for data relating to vacant properties as part of the Dundee Housing Land Audit
2. Request for data concerning empty non-domestic buildings and in particular, the upper vacant floors above existing ground floor premises in the city centre
3. Request to develop an ongoing continuous register of self-build sites
4. Need for updated flood risk data to inform SAM
5. Consideration of student accommodation to be a form of housing tenure in relation to affordable housing

6. Request for a full list of final datasets to be provided in Evidence Report

DCC Response

9.230 The Evidence Report is the primary key starting point in the LDP process, drawing together existing data, research and information to establish baseline information on the local authority area. Local authorities are being advised to be proportionate, and it should be emphasised that the purpose of the Evidence Report is to collate, analyse and interpret available evidence from established sources, rather than to commission or generate entirely new datasets. With this clarification in mind, the Council address the specific concerns as follows:

Vacant Property Evidence

9.231 The Empty Homes Strategy ([DED312](#)) represents the most current and comprehensive data available on this topic. Creation of new datasets concerning “empty non-domestic buildings and in particular, the upper vacant floors above existing ground floor premises in the city centre”, would be out with the scope of the current Evidence Report stage.

9.232 This matter of dispute was also submitted by Dundee Civic Trust to the Schedule covering the Issue - Town Centre First and Economy (011). The Council’s consideration of practicalities and feasibility of collecting vacant property data is outlined in full within the Statements of Agreement / Dispute section of that Schedule.

Self-Build Register

9.233 The Evidence Report will accurately reflect the current self-build register data that exists and is maintained in accordance with the Planning (Scotland) Act 2019. While the Council cannot create a new system of data collection at the Evidence Report stage, it is noted the potential benefits of a more accessible approach for consideration in the future.

Flood Risk Assessment

9.234 The concern about updated flood risk data is noted. The Evidence Report uses the most current SEPA data available at the time of submission. The Council have worked closely in consultation with SEPA as part of the plan preparation process and in agreeing a Stage 1 Strategic Flood Risk Assessment that has been prepared as part of the Evidence Report submission. The Council note in the Evidence Report that SEPA is planning an update for 2025 and acknowledge that this may need to be considered during later stages of LDP process and site selection when available.

Student Accommodation as Housing Tenure

9.235 The Evidence Report reflects currently available data on housing tenures such as the Housing Needs and Demands Assessment, and student accommodation has not been categorised in this way and also is not within the Scottish Government’s updated guidance for undertaking Housing Land Audits. The Council note that there is a potential gap and give consideration to this approach in future housing analysis or Call for Ideas stage of the LDP process.

Evidence Datasets

9.236 The Evidence Report provides a comprehensive list of all datasets used and sources indicated. This provides clarity on the evidence that has informed the conclusions and summary of implications for the Proposed Plan.

Business and Industry, Brownfield, Vacant and Derelict Land and Buildings (010)

Issue: Topic / Place	Business and Industry, Brownfield, Vacant and Derelict Land and Buildings (DER010)
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended, Section 15(5) • The principal physical and environmental characteristics of the district. • the principal economic characteristics of the district; and • the principal purposes for which the land is used.
Links to Evidence	Policy 9 Brownfield, Vacant and Derelict Land and Empty Buildings • National Planning Framework 4 (DED201) • Dundee Local Development Plan 2019 (DED088) • Scottish Vacant and Derelict Land Survey (DED338) • Scottish Vacant and Derelict Land Survey 2023 (DED382) • Scottish Vacant and Derelict Land Survey – Site Register (DED337) • Dundee Open Data Portal: Scottish Vacant and Derelict Land Survey (DED365) • Dundee Business Land Audit 2024 (DED066) • Dundee Employment Land Survey 2024 – GIS Map (DED390) • Dundee Housing Land Audit 2024 (DED085) • Dundee Housing Land Audit 2024 – GIS Map (DED391) • Buildings at Risk Register (DED024) • Scottish City Centres: Reduce Vacant/Derelict Land and Property (Dundee) (DED319) • LDP2 Development Site Assessments 2018 (DED175) • Blackness Business Place Plan (DED022) • Dundee City Centre Strategic Investment Plan 2050 (DED067) Policy 26 Business and Industry • National Planning Framework 4 (DED201) • Dundee Local Development Plan 2019 (DED088) • Scotland's National Strategy for Economic Transformation (DED263) • Tay Cities Region Economic Strategy 2019-2039 (DED283) • Tay Cities Region Deal: Deal Document 2020 (DED284) • Tay Cities Region Deal: Annual Performance Report 2022-2023 (DED353) • Scotland's National Innovation Strategy (DED322) • City Plan for Dundee 2022-2032 (DED026) • Discover Work: Strategy 2022-2027 (DED057) • Scottish Vacant and Derelict Land Survey (DED338) • Scottish Vacant and Derelict Land Survey 2023 (DED382) • Scottish Vacant and Derelict Land Survey – Site Register (DED337) • Dundee Open Data Portal: Scottish Vacant and Derelict Land Survey (DED365) • Dundee Business Land Audit 2024 (DED066) • Dundee Employment Land Survey 2024 – GIS Map (DED390) • Dundee City Centre Strategic Investment Plan 2050 (DED067)

Summary of Evidence	
<u>Policy 9 Brownfield, Vacant and Derelict Land and Empty Buildings</u> Policy Context National Planning Framework 4 (DED201) 10.1 NPF4 recognises that creating more liveable urban areas requires the reuse and repurposing of our brownfield, vacant and derelict land and empty buildings. Development of such opportunities can often take advantage of existing infrastructure and sustainable modes of transportation, while helping to improve the health and wellbeing of local communities by reducing or removing the negative effects associated with vacant and derelict sites. 10.2 Redevelopment of vacant and derelict sites also helps to reduce the demands on greenfield land and counteracts the trend of urban sprawl, which helps tackle the biodiversity crisis and supports nature recovery. Long-term vacant sites can also contain significant natural features which support biodiversity, the value of this biodiversity must be considered in determining whether reuse is sustainable. 10.3 Policy 9 intends to encourage, promote and facilitate the reuse of brownfield, vacant and derelict land and empty buildings, and to help reduce the need for greenfield development. 10.4 Successful outcomes through policy delivery would result in development that is directed to the right locations, maximising the use of existing assets and minimising additional land take. The contribution of brownfield land to nature recovery is recognised and opportunities for use as productive greenspace are realised where appropriate. Derelict buildings and spaces are regenerated to improve wellbeing and transform our places. 10.5 The policy sets out the following specific requirements of Local Development Plans: • LDPs should set out opportunities for the sustainable reuse of brownfield land including vacant and derelict land and empty buildings. 10.6 Implications for planning's Development Management are that development proposals which result in the sustainable reuse of brownfield land including vacant and derelict land and buildings, whether permanent or temporary, will be supported. In determining whether the reuse is sustainable, the biodiversity value of brownfield land which has naturalised should be taken into account. 10.7 Proposals on greenfield sites will not be supported unless the site has been allocated for development or the proposal is explicitly supported by policies in the LDP. 10.8 Where land is known or suspected to be unstable or contaminated, development proposals will demonstrate that the land is, or can be made, safe and suitable for the proposed new use. 10.9 Development proposals for the reuse of existing buildings will be supported, taking into account their suitability for conversion to other uses. Given the need to conserve embodied energy, demolition will be regarded as the least preferred option.	

Dundee Local Development Plan 2019 ([DED088](#))

10.10 Dundee City Council's current Local Development Plan 2019 (LDP 2019) includes several policies which influence development of brownfield sites, vacant and derelict land and empty buildings. The policies have been identified below, including a note on their relevance.

LDP 2019 Policy	Relevance to NPF4 Policy 9
Policy 21 Town Centre First Principle	The TCF principle directs specific kinds of development towards urban centres, where there is a considerable proportion of land, sites and buildings that are a development priority.
Proposal 1 Blackness Regeneration	This proposal led to the creation and adoption of the Blackness Business Place Plan (DED022), which has broadened the use class range within this designated General Economic Development Area (GEDA) to encourage the reuse and redevelopment of land and buildings. Crucially, this GEDA sits on the edge of the city centre area.

Figure 10.1: Local Development Plan 2019 policy links to NPF4 Policy 9.

Evidence Review

Scottish Vacant and Derelict Land Survey [DED338](#)

10.11 The Scottish Vacant and Derelict Land Survey (SVDLS) is compiled from Local Authority planning data by the Scottish Government and is undertaken to establish the extent and state of vacant and derelict land in Scotland. The data collected provides an invaluable source of information relating to vacant and derelict sites and assists in reinforcing and justifying national policy established to bring about the re-use and regeneration of these land resources. The compiled survey data and analysis from 2023 is available on the Scottish Government's SVDLS Site Register ([DED337](#)).

10.12 The [Scottish Government's Scottish Vacant And Derelict Land Survey 2020 Guidance Notes](#) set out in detail how the vacant and derelict land process is conducted, and provides detail on how land is classified. The broad definitions of vacant and derelict land are as follows:

- Vacant land is previously developed land, without physical constraint, which the Planning Authority has indicated is currently available for redevelopment.
- Derelict land is previously developed land which has a physical constraint caused by its previous use which hampers its redevelopment or naturalisation.

10.13 Some key statistics on Dundee's vacant and derelict land are listed below. The data is extracted from the data tables within the 'Scottish Vacant and Derelict Land Survey 2023' ([DED382](#)).

- Total area of derelict land: 11 hectares (13 sites).
- Total area of urban vacant land: 130 hectares (115 sites).
- Total area of derelict and urban vacant land: 141 hectares (128 sites).

- The total area of derelict and urban vacant land has reduced by 23% from 2017 to 2023 (from 182 to 141 hectares).
- 59 of the 128 derelict and urban vacant land sites are located within the city's 15% most deprived datazones.
- 27% of the city's local population live within less than 500m of derelict land.
- 40% of the city's local population live within 500m to 1000m of derelict land.
- 32% of the city's local population live within 1000m or further from derelict land.

Dundee Open Data Portal: Scottish Vacant and Derelict Land Survey ([DED365](#))

10.14 Location data on the 2023 Scottish Vacant and Derelict Land Survey is available through the City Council's Open Data Portal website, which spatially maps all of the city's vacant and derelict land.

Dundee Business Land Audit 2024 ([DED066](#))

10.15 Dundee's 2024 Business Land Audit provides an annual audit to monitor the supply, take up and status of business land within the Dundee City Council area. The audit identifies the availability and constraints of employment land and assesses the range and choice of marketable sites and locations for businesses within a variety of size and quality requirements. Business land identified within the audit only concerns land located within an area allocated within the Dundee Local Development Plan 2019 as a Principal, Specialist, or General Economic Development Area. A breakdown of the effective and constrained land is provided within the document's tables with approximately 120 hectares of marketable land available within the City. All of the sites can be located on the map provided through the Dundee Employment Land Survey 2024 – GIS Map ([DED390](#)).

Dundee Housing Land Audit 2024 [DED085](#)

10.16 Dundee's 2024 Housing Land Audit provides a factual statement of land supply within Dundee's administrative boundary, which identifies that there is an effective supply of land for housing across the City. A breakdown of the effective and constrained greenfield and brownfield land is provided within the document's tables, and all of the sites can be located on our GIS mapping application ([DED391](#)).

Buildings at Risk Register [DED024](#)

10.17 The online Buildings at Risk Register is a national database providing information on heritage buildings which are at risk due to their need for repair, re-use, and/or re-purposing. There are currently 33 buildings classified as 'at-risk' in Dundee. There are also a further 6 buildings on the list which are classified as 'restoration in progress'. The current occupancy status of these buildings is 28 vacant, 10 part-occupied, and 1 unknown.

10.18 Historic Environment Scotland's LDP evidence response to Dundee City Council is covered in detail within the 'Design Quality and Place' section of the evidence report, this included commentary on Dundee's Buildings at Risk Register. Specific comments on Dundee's Buildings at risk are highlighted below.

- A third (11) represent the city's industrial heritage, most (6) relating to textile production. A quarter (9) are classified as residential buildings. These are empty homes ranging in size from cottages to middle size houses and country houses. The remainder of the Register include buildings such as theatres, churches, cemeteries and offices.

- Nearly 60% (20) are in 7 of Dundee's conservation areas. Dundee Central has the most (7) followed by Blackness (4) Lochee (3) West End Lanes (3) Maryfield (1) Trottick (1) and West End Suburbs (1)
- Across BARR urban buildings are mostly assessed at Poor condition. In Dundee, most (15) have been assessed at Fair.
- Across BARR the percentage of buildings in areas of comparatively more deprivation (SIMD Deciles 1-3) is around 17%. In Dundee it is 29% (10) including buildings such as the Camperdown Warehouses, Eagle Mill and King's Theatre.
- There are multi-building At-Risk sites in Camperdown Park (3) and East Mill (3). There is a cluster (6) located in SIMD datazone (S01007691) Perth Road – 03 consisting of the Roseangle villas, and the two industrial complexes of East Mill and Queen Victoria Works.
- A number also appear on the Vacant and Derelict Land Register, including Forebank House, East Mill, Queen Victoria Works and Van Leer Factory.
- Fundraising towards the regeneration of Maryfield Transport Depot as the Dundee Transport Museum, is understood to be ongoing. Dock Street's Custom House is under marketing for sale. Demolition of the remaining Van Leer Factory has been approved.
- Around 80% of buildings are now long-term At-Risk and have featured on the Register for 10 years or more.

Vacancy Monitoring

10.19 To better monitor commercial vacancies across the city, we are in the process of building a Geographic Information Systems (GIS) mapping tool which uses the City Council's non-domestic rates data to plot vacant properties. An early prototype of the tool's dashboard is in production, further information on the tool is evidenced under policy 27 City, Town, Local and Commercial Centres (para. 11.11 to 11.12).

Scottish City Centres: Reduce Vacant/Derelict Land and Property (Dundee) [DED319](#)

10.20 Savills were commissioned by the Scottish Cities Alliance to undertake research and provide recommendations on the issue of reducing the amount of vacant and derelict land and property in Scotland's city centres. The key barriers to development identified within Dundee are set out below.

10.21 Demand for Vacant & Derelict Land

- There is a clear lack of demand for development sites in Dundee, partly due to the fact that some major redevelopment sites will require large amounts of upfront investment.
- Perceived market risk and economic uncertainty play a factor in the demand for land. Developers will look to develop land already under their ownership or look to robust, mature markets where historical sales rates have been strong.
- Dundee's weak rental market means the likelihood of Build-to-Rent or large-scale flatted developments out with the established areas, such as the Waterfront and West End, are unlikely. However, there are a number of sites within the Waterfront which remain undeveloped due to perceived market risk.

10.22 Note: The report states that "Many sites within Dundee are under fragmented ownership and therefore being able to acquire a whole site is somewhat difficult". However, following review of the data provided in the vacant and derelict land online site register ([DED337](#)), this statement is incorrect as there are very few vacant and derelict land sites within multiple ownership. With reference to the register data,

there are only 5 sites identified as having more than 1 owner, 11 sites are 'ownership unknown', and the other 112 sites are defined as 'only one owner'.

10.23 Development Constraints

- Almost all of the sites within the city centre boundary are brownfield sites with existing buildings. Therefore, there are considerable works required, and upfront costs before any development can take place. As interest rates are rising, and the cost of borrowing becomes more expensive, developers will look to sites which they can develop more easily and in turn produce income more quickly.
- Redevelopment of upper floors for residential use may be compromised due to inefficient floor plates, lack of natural light or access issues. Assessing each property on an individual basis for the purposes of redevelopment can become costly and time consuming.

LDP2 Development Site Assessments 2018 [DED175](#)

10.24 Site assessments were carried out to identify the development sites for inclusion in the current Dundee Local Development Plan 2. The detailed assessment process determined which sites were allocated for specific purposes and those which were not to be taken forward as an allocation. Each site assessment identifies the physical, environmental and infrastructure attributes of each site, including whether it is designated as greenfield or brownfield land, and highlighting if it is on Vacant & Derelict Land Register.

Blackness Business Place Plan [DED022](#)

10.25 The Blackness Business Place Plan (BBPP) essentially introduces a broader range of development opportunities to the Blackness General Economic Development Area (GEDA), which sits on the western edge of the city centre and contains a significant amount of vacant land and buildings. There are multiple GEDAs located throughout Dundee (established and enforced through the current Local Development Plan), which reserve land for use classes 4 Business, 5 General Industrial, and 6 Storage and Distribution. To help encourage development within the area and to embrace positive diversification that has already occurred, further use classes were introduced. Significant development interest, planning applications, and physical development has resulted from the change this plan has introduced.

Dundee City Centre Strategic Investment Plan 2050 ([DED067](#))

10.26 In response to the challenges facing Dundee's city centre, a long-term strategic investment plan was approved at Committee during the summer of 2023. The plan aims to create a more thriving, liveable, city centre and to increase the opportunities for employment, leisure, tourism, and residential uses. Various vacant, underused, and strategic sites and buildings have been identified as opportunities for redevelopment. Most of the sites provide significant opportunities to increase the city centre's residential population, services, leisure and tourism offer, and employment opportunities. The plan has helped to stimulate significant interest and ongoing dialogue regarding some of the city centre's most challenging sites and existing buildings.

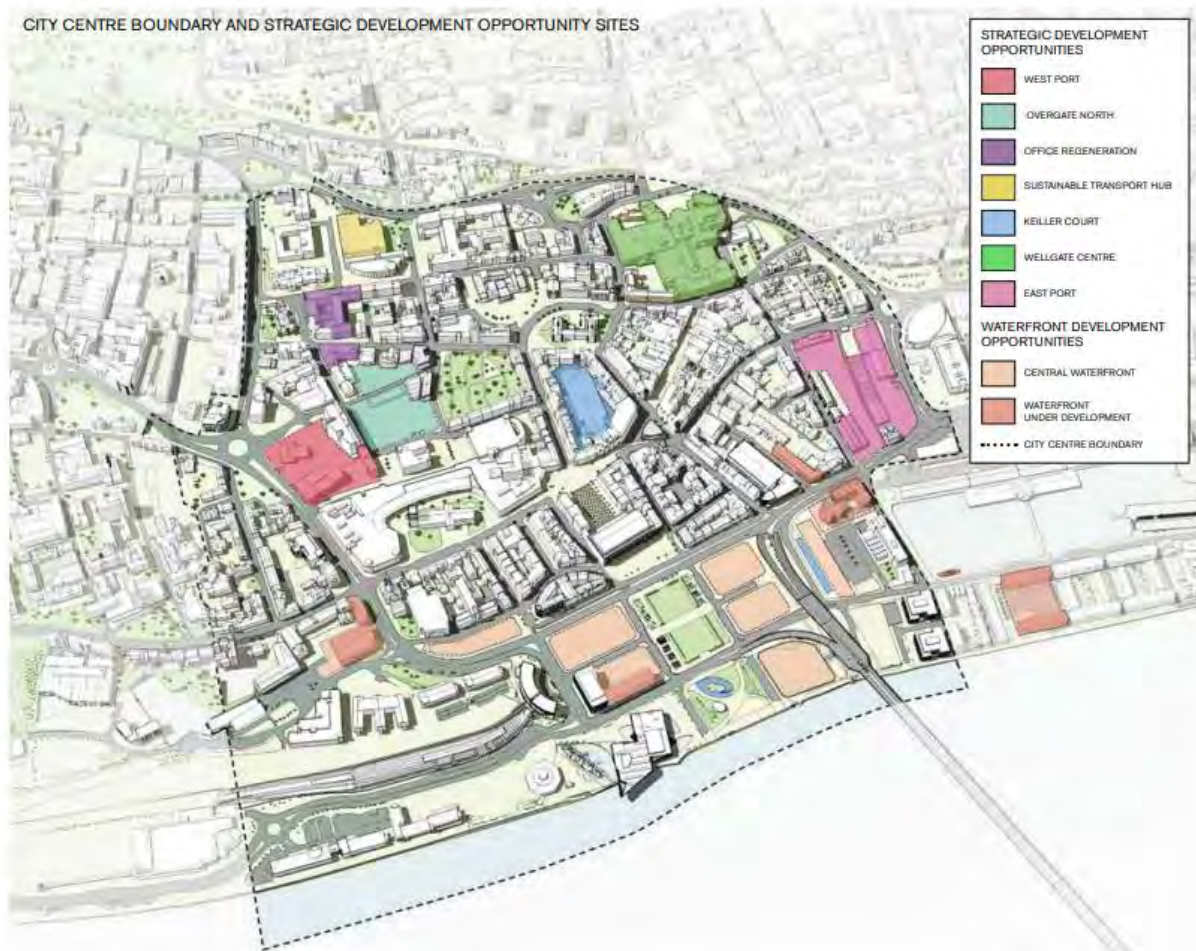


Figure 10.2: Strategic Development Opportunities - Dundee City Centre Strategic Investment Plan 2050

Policy 26 – Business and Industry

Policy Context

National Planning Framework 4 ([DED201](#))

- 10.27 NPF4 recognises that having an appropriate level of business and industry land is essential to creating productive places. Having a positive mix of business and industry opportunities helps to attract new investment, build business confidence, stimulate GDP, export growth and entrepreneurship, and facilitate future ways of working. Planning for this allows us to build a globally competitive, entrepreneurial, inclusive and sustainable economy, with thriving and innovative businesses, quality jobs and fair work for everyone.
- 10.28 Policy 26 intends to encourage, promote and facilitate business and industry uses and to enable alternative ways of working such as home working, live-work units and micro-businesses.
- 10.29 Successful outcomes through policy delivery would result in development that supports sustainable and inclusive recovery within the business and industry sector and creates investment in business and industry which contributes to community wealth building.
- 10.30 The policy sets out the following specific requirements of Local Development Plans:

- LDPs should allocate sufficient land for business and industry, taking into account business and industry land audits, in particular ensuring that there is a suitable range of sites that meet current market demand, location, size and quality in terms of accessibility and services. This allocation should take account of local economic strategies and support broader objectives of delivering a low carbon and net zero economic recovery, and a fairer and more inclusive wellbeing economy.

10.31 Implications for planning's Development Management are that development proposals for business and industry uses on sites allocated for those uses in the LDP will be supported.

10.32 Development proposals for home working, live-work units and micro-businesses will be supported where it is demonstrated that the scale and nature of the proposed business and building will be compatible with the surrounding area and there will be no unacceptable impacts on amenity or neighbouring uses.

10.33 Development proposals for business and industry uses will be supported where they are compatible with the primary business function of the area. Other employment uses will be supported where they will not prejudice the primary function of the area and are compatible with the business/industrial character of the area.

10.34 Development proposals for business, general industrial and storage and distribution uses outwith areas identified for those uses in the LDP will only be supported where it is demonstrated that there are no suitable alternatives allocated in the LDP or identified in the employment land audit; and the nature and scale of the activity will be compatible with the surrounding area.

10.35 Development proposals for business and industry will take into account the impact on surrounding residential amenity, sensitive uses and the natural and historic environment; and the need for appropriate site restoration at the end of a period of commercial use.

10.36 Major developments for manufacturing or industry will be accompanied by a decarbonisation strategy to demonstrate how greenhouse gas emissions from the process are appropriately abated. The strategy may include carbon capture and storage.

Dundee Local Development Plan 2019 ([DED088](#))

10.37 Dundee City Council's current Local Development Plan 2019 (LDP 2019) includes several policies which safeguard allocated land and influence development proposals for business and industry uses. The policies have been identified below, including a note on their relevance.

LDP 2019 Policy	Relevance to NPF4 Policy 26
Policy 3 Principal Economic Development Areas	Safeguarding of land allocated for principal business and industry uses, including Class 4 "Business", Class 5 "General Industry" and Class 6 "Storage and Distribution".
Policy 4 Specialist Economic Development Areas	Safeguarding of land allocated for specialist business and industry uses, specifically for Class 4 "Business" uses which align with the distinctive nature of the area, e.g. technology, creativity, and biomedicine.
Policy 5 General Economic Development Areas	Safeguarding of land allocated for general business and industry uses, including Class 4 "Business", Class 5 "General Industry", Class

	6 “Storage and Distribution”, and broader uses such as car showrooms, wholesaling and scrap yards.
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Figure 10.3: Local Development Plan 2019 policy links to NPF4 Policy 26.

Evidence Review

Scotland's National Strategy for Economic Transformation ([DED263](#))

10.38 This national strategy sets a vision for Scotland to become a wellbeing economy by 2032, one that thrives across economic, social and environmental dimensions, and delivers economic prosperity for all Scotland’s people and places. Achieving this would result in Scotland being recognised globally as:

- An international benchmark for how an economy can de-carbonise.
- The best place to start and grow a business or social enterprise.
- A magnet for inward investment.
- A great place to live and work with high living standards.
- A nation where people and businesses can continually upgrade their skills.
- A leader in research and development.
- A country where economic power and opportunity is distributed fairly.
- An outward looking nation exerting a meaningful influence.

10.39 To make this vision a reality and drive forward the necessary improvements in Scotland’s economy, the strategy contains 6 programmes, 18 projects and 77 actions. Partnership working across the public, private and third sector will be critical to delivering the actions. The 6 programmes and their intensions are identified below.

1. Entrepreneurial People and Culture

- Embed first rate entrepreneurial learning across the education and skills systems.
- Create a world class entrepreneurial infrastructure of institutions and programmes providing a high intensity pathway for high growth companies.
- Attract and retain the very best entrepreneurial talent from at home and abroad.
- Build an entrepreneurial mindset in every sector of our economy.

2. New Market Opportunities

- Build on Scotland’s strengths to win an ever greater share of domestic and international market opportunities.
- Support the development of Scottish supply chains, laying the foundations of a net zero industrial strategy.
- Attract and deploy significant domestic and international private investment in Scotland.

3. Productive Businesses and Regions

- To create and sustain a resilient national infrastructure that can support a high productivity economy. (The provision of sufficient home building plays an important role in securing economic growth outcomes).
- Improve connectivity infrastructure and digital adoption across the economy.
- Upskill business and public sector leaders, pioneering new approaches to driving productivity improvements.
- Realise the potential of the different economic and community assets and strengths of Scotland’s regions.

4. Skilled Workforce

- Adapt the education and skills system to make it more agile and responsive to our economic needs and ambitions.
- Support and incentivise people, and their employers, to invest in skills and training throughout their working lives.
- Expand Scotland's available talent pool, at all skills levels, to give employers the skills pipeline they need to take advantage of opportunities.

5. A Fairer and More Equal Society

- Tackle poverty through fairer pay and conditions.
- Eradicate structural barriers to participating in the labour market.

6. A Culture of Delivery

- Strengthen accountability and transparency.
- Transform the way support is delivered to people and businesses across Scotland.
- Measure success.

Scotland's National Innovation Strategy ([DED322](#))

10.40 The Scottish Government's National Innovation Strategy outlines an ambition to bring Scotland in line with European countries of a similar size such as Denmark, Norway and Finland. The strategy intends to capitalise on existing economic and business resources such as Health and Life Sciences, Data and Technologies and Advanced Manufacturing. It also highlights Scotland's opportunity to thrive through a green energy transition, through capitalising on existing expertise, international leading energy research and sustainable natural resources.

Tay Cities Region Economic strategy 2019-2039 ([DED283](#))

10.41 The Tay Cities Region Economic Strategy (TCRES) covers the area of East Central Scotland covered by the local authorities of Angus, Dundee, Perth & Kinross and the north-east part of Fife.

10.42 The TCRES supports the adoption of a place-based approach to improve social connectivity, residential development, leisure activities, heritage, tourism and cultural offerings, and the night-time economy. The principle of a place-based approach addresses the needs of those who live and work in a specific area. The approach becomes a more holistic and collaborative process, utilising existing land and buildings more effectively, providing better outcomes for those who live and work in those areas.

10.43 The strategy details that the Tay Cities Regions have ageing industrial estates and business properties, which is restricting inward investment as well as the growth of existing businesses, and there is also limited amounts of appropriate employment land for future business and economic uses. City centre and urban development is highlighted as a key focus within the strategic plan.

Tay Cities Region Deal: Deal Document 2020 ([DED284](#))

10.44 The aim of the Tay Cities Region Deal (TCRD) is to enhance the lives of the region's residents by delivering inclusive growth. The TCRD will support business growth, develop innovative technologies, enhance productivity, develop skills, create jobs, and be delivered in the context of the Tay Cities Region Economic Strategy 2019-2039 ([DED283](#)), as described above. The Strategy has a vision to grow the region's strong and up-and-coming business sectors by building on existing regional skills, innovation and experience. The TCRD investment will help to address the region's challenges and deliver the strategy vision. Specific projects are identified for Dundee, including the completed Cyber Quarter at Abertay University, the completed transformation of the Discovery Point museum, and the Life Sciences Innovation Hub, currently under construction at the Technopole site to the north of University of Dundee

campus. Further detail on the full range of projects can be found in the latest report: Tay Cities Region Deal: Annual Performance Report 2022-2023 ([DED353](#)).

City Plan for Dundee 2022-2032 ([DED026](#))

- 10.45 Dundee's City Plan 2022 – 2032 seeks to improve the wellbeing and quality of life of the residents of Dundee, with a particular focus on reducing inequality and poverty, while developing the city's economy and tackling climate change. The plan recognises that Dundee has enduring inequalities which have continued to persist and expand, with a lack of employment opportunities perpetuating the issue of inequality.
- 10.46 The plan details that the economic picture across Dundee is mixed. Although Dundee has improved traditional measures of economic performances, it still sits below the Scottish average in relation to economic activity and employment growth. The unemployment rate in Dundee at 4.9% remains higher than the Scottish average of 3.9% (January 2021-December 2021). Dundee also has a higher proportion of groups identified as being at particular risk from ongoing COVID-19 disruption.
- 10.47 A specific concern that has been outlined by the Dundee City Plan is city centre regeneration. As we transition to digital ways of working and living, we are seeing less people shopping and working within our city centre. This has resulted in lower footfall, further compounding existing challenges that our city centre businesses face.

Discover Work: Strategy 2022-2027 [DED057](#)

- 10.48 This local strategy sets an ambition to decrease unemployment in Dundee in line with the Scottish national average, bringing 1600 people back into employment. Discover Work have estimated that there could be up to 11,300 individuals who are currently outside of the labour market.
- 10.49 Discover Work have detailed that by increasing employment for those who are currently outside of work can significantly reduce the level of benefit claimants, reduce the demand on mental health services and reduce the number of calls to other emergency and frontline services.

Scottish Vacant and Derelict Land Survey [DED338](#)

- 10.50 Please see paragraph 10.11 to 10.13 of policy 9 Brownfield, Vacant and Derelict Land and Empty Buildings.

Dundee Open Data Portal: Scottish Vacant and Derelict Land Survey ([DED365](#))

- 10.51 Please see paragraph 10.14 of policy 9 Brownfield, Vacant and Derelict Land and Empty Buildings.

Dundee Business Land Audit 2024 ([DED066](#))

- 10.52 Please see paragraph 10.15 of policy 9 Brownfield, Vacant and Derelict Land and Empty Buildings.

Dundee City Centre Strategic Investment Plan 2050 ([DED067](#))

10.53 Please see paragraph 10.26 of policy 9 Brownfield, Vacant and Derelict Land and Empty Buildings.

Summary of Stakeholder Engagement

Pre Topic Paper Consultation

10.54 The initial stakeholder working group listed below was developed through internal and external individuals with responsibilities and interests in business and industry. As set out in the list below, the group consisted of internal Dundee City Council representatives and key agency representatives. These topic experts assisted in developing a robust evidence base for the topic paper.

Internal

- DCC Economic Development
- Dundee Tay Cities Deal Team

External

- Scottish Enterprise

Topic Paper Consultation

10.55 The Business and Industry, Brownfield, Vacant and Derelict Land and Buildings Topic Paper (DER010) was published for consultation between 21st August 2024 and 2nd October 2024 and forms the basis for the 'Summary of Evidence'. All stakeholders involved in the preparation of the topic paper were also formally consulted on the published topic paper.

Post Topic Paper Consultation

10.56 Formal responses to the topic paper consultation were assessed and appropriate changes have been incorporated into the Summary of Evidence. Where consultees disputed any of the submitted evidence, resolution email correspondence was conducted to justify our methodology/ position, or to confirm amendments/ additions in alignment with comments.

Engagement Summary Table

10.57 The following table identifies engagement with stakeholders, from the topic paper consultation period onwards, including summary comments and Dundee City Council's responses. Comments are only provided where contributions from stakeholders led to amendments or additions to the evidence base. Where formal disputes could not be resolved through further engagement they are identified in the table and then further detail is provided within the 'Statements of Agreement / Dispute' section.

Stakeholder	Summary Comments and DCC Response
Scottish Enterprise – (STA056)	In agreement with the evidence. Raised awareness of the most up-to-date version of the vacant and derelict land register. Highlighted the relevance of the Dundee City Centre Strategic Investment Plan (DED067) to the Business and Industry policy. Recommended further analysis of evidence at regional strategy level, e.g. Tay Cities Deal.

		DCC Response: Comments incorporated into Schedule 3.
Historic Environment Scotland – (STA004)	In agreement with the evidence. Detailed data and statistics on the Buildings at Risk Register provided and confirmation on the number of at-risk buildings. DCC Response: Comments incorporated into Schedule 3.	
Homes for Scotland – (STA047)	Dispute the evidence. DCC Response: Comprehensive email response submitted to Homes for Scotland, resulting in the resolution of all but one disputed aspect, which is the request for the proposed Brownfield Urban Capacity Study to be carried out as part of the Evidence Report. Please see the ‘Statements of Agreement/ Dispute’ section below for further information. Comments made by Homes for Scotland resulted DCC’s GIS presentation of the Vacant and Derelict Land Survey being incorporated into the Schedule 3.	
Private Individual – (STA033)	In agreement with the evidence. DCC Response: Comments noted.	
Private Individual – (STA041)	In agreement with the evidence. DCC Response: Comments noted.	
Private Individual – (STA042)	Disagrees with the evidence but does not formally dispute the evidence. Concerns raised regarding current LDP policy interpretation, particularly the focus on ‘town centre first principle’, which is said to be driving business development towards the city centre to the detriment of opportunities for brownfield land and vacant sites on the edge of the centre or within district centres. DCC Response: Email response provided, acknowledging that the concerns raised relate to interpretation of current LDP 2019 policy. The current focus is on published evidence and data sets, which we are open to receiving. The nature of the comments provided are more aligned to the future ‘Call for Ideas’ and ‘Proposed Plan’ stages and we welcome comments to be submitted during the ‘Call for Ideas’ stage.	
Summary of Implications for the Proposed Plan		

Policy 9 - Brownfield, Vacant and Derelict Land and Empty Buildings

- 10.58 An understanding of Dundee's brownfield, vacant and derelict land and empty buildings will have to be built up by bringing together all of the data sources identified. Combining this information should help to produce a reasonably comprehensive brownfield urban capacity study.
- 10.59 The data and statistics provided through the Scottish Vacant and Derelict Land Survey ([DED338](#)), and the Business land Audit ([DED066](#)) and Housing Land Audit ([DED085](#)) will help to inform the plan preparation and spatial strategy, particularly regarding the identification of redevelopment priorities.
- 10.60 The LDP2 Development Site Assessments 2018 ([DED175](#)) provide a good starting point for identifying brownfield sites and assessing their viability. The next Call for Ideas/Call for Sites will help to identify and assess further sites.
- 10.61 The Savills report ([DED319](#)) highlights the significant challenges Dundee faces in trying to develop its brownfield, vacant and derelict land and empty buildings. Plans, like the Blackness Business Place Plan ([DED022](#)), and the Dundee City Centre Strategic Investment Plan 2050 ([DED067](#)), make a significant contribution to building investor/developer confidence and establishing a vision to buy into. Both plans will be carried forward into the Proposed Plan.

Policy 26 – Business and Industry

- 10.62 The national, regional and local plans and strategies identified provide context for why it is essential to maintain and allocate a sufficient supply of land for business and industry. The next LDP will support the business and industry priorities set out within these plans and strategies.
- 10.63 The data and statistics provided through the Scottish Vacant and Derelict Land Survey ([DED338](#)) and the Dundee Business Land Audit ([DED066](#)) will help to inform the plan preparation and spatial strategy, particularly regarding the identification of redevelopment priorities.
- 10.64 The most recent Business Land Audit ([DED066](#)) indicates a reduction of marketable employment land from 134 ha. to 120 ha., leaving an equivalent of a 9-year supply of land. Since that audit was undertaken, development has commenced on at least a further 18 ha of land thus reducing the land supply to between 6.5 years and 7.5 years. It is difficult to identify any trends due to the impact of the Pandemic which influenced take up rates between 2020 and 2022 but the further loss of employment land to non-employment uses would be difficult to support and a policy of protecting existing land supply is appropriate.
- 10.65 As plan preparation proceeds further, future Business Land Audit information will become available which will help inform whether additional business land allocations are appropriate.
- 10.66 Although Dundee's city centre area is not allocated within the current Local Development Plan as an Economic Development Area with prescriptive use class parameters, there is a focus on growing business and employment within the city centre for multiple benefits, as set out in the Dundee City Centre Strategic Investment Plan 2050 (CCSIP) ([DED067](#)). The CCSIP will be carried forward as a material consideration into the next LDP and will provide support for appropriate businesses which choose to locate within the city centre.

Statements of Agreement / Dispute

Statements of Agreement

10.67 As outlined within the Summary of Stakeholder Engagement, a significant level of engagement was carried out with multiple stakeholders during pre-consultation, consultation, and post-consultation of the topic paper. The following organisations agree with the evidence base presented:

- Dundee Tay Cities Deal Team
- Historic Environment Scotland (STA004)
- Scottish Enterprise (STA056)

Statements of Dispute

10.68 Throughout the course of the consultation on the Business and Industry topic paper one formal dispute was submitted by Homes for Scotland. The Council have carefully considered all issues raised and submitted comments back to Homes for Scotland to clarify the position. As a result of the response, Homes for Scotland have chosen to take one aspect of their dispute to Gate Check, which is the requirement for the proposed Brownfield Urban Capacity Study to be carried out and made available for review prior to the Evidence Report submission to Gate Check. The nature of their full dispute and the Council's final position is set out below.

Homes for Scotland (STA047)

10.69 Homes for Scotland's dispute applies to two aspects of the evidence base:

- Evidence/Dataset Sufficiency
- Agreement on Proposed Plan Implications

10.70 A summary of the 'Formally Disputed Points' (point 3 below) was provided by Homes for Scotland, and this is addressed at the end of this section. Each aspect is addressed individually as follows:

1. Evidence/Dataset Sufficiency

Dispute

- The topic paper lacks evidence, such as a breakdown by ownership and visual representations of the scale of brownfield, and vacant and derelict Land.
- The weblink for the Savills report "Scottish City Centres: Reduce Vacant/Derelict Land and Property (Dundee)" ([DED319](#)) was not functional and therefore unavailable for review.

DCC Response

10.71 The Council acknowledged the criticism over the level of information presented and subsequently hosted the vacant and derelict land data in GIS format on the City Council's Open Data Portal and have included it within the Evidence Report. At the time of publishing the topic paper, the information requested could be attained by cross referencing the site codes provided through the Improvement Service Mapping Tool and the online Scottish Vacant and Derelict Land Survey - site register. Both information sources were included in the original topic paper.

10.72 It is unclear why the weblink for the Savills report was broken, however, as soon as we became aware of the issue the link was reinstated. The topic paper does provide a comprehensive overview of the key barriers to development identified within Dundee by the Savills report. The report is incorporated into the evidence report and taken to Gate Check.

2. Agreement on Proposed Plan Implications

Dispute

10.73 The Savills report highlights that market demand to develop vacant and derelict land is restricted in Dundee due to a variety of factors, including the large amounts of upfront investment required, the perceived market risk and economic uncertainty, and that many of the identified sites are under fragmented ownership. As such, the sum deliverability of these sites is, at best, uncertain. Limited confidence can be placed in these sites delivering a notable proportion of the new homes required to exceed the Minimum All-Tenure Housing Land Requirement.

10.74 Homes for Scotland supports the sustainable reuse of brownfield land including Vacant and Derelict land and empty buildings. However, viability requires to be more fully understood and considered in the context of NPF4 Quality Homes. If it cannot be demonstrated that a site can viably be delivered, it should not be allocated regardless of whether it is a brownfield or greenfield site. Consequently, the City Council's proposed Brownfield Urban Capacity Study should be carried out and made available for review prior to the Evidence Report being submitted to the Gate Check.

DCC Response

10.75 Regarding the need for viability and marketability factors to play a role in housing site allocation for vacant and derelict land, comprehensive site assessments will be carried out on all potential housing sites during the call for sites period. Assessments will be carried out under the revised site assessment methodology, and undeveloped sites allocated within the current Local Development Plan 2019 will be included within the assessment.

10.76 The request for the proposed brownfield urban capacity study to be carried out and published for review, prior to gate check submission, would not deliver the comprehensive outcome required. The information provided through the Call for Ideas stage and the necessary site assessments needs to be included in the study to help produce a comprehensive outcome. This will also include analysis of information held on Dundee's brownfield land, vacant and derelict Land, and the Housing Land Audit.

10.77 Regarding the Savills report comment that many vacant and derelict sites within Dundee are under fragmented ownership. It is worth highlighting that following review of the data provided in the vacant and derelict land online site register this statement is incorrect as there are very few vacant and derelict land sites within multiple ownership. With reference to the register, there are only 5 sites identified as having more than 1 owner, 11 sites are 'ownership unknown', and the other 112 sites are defined as 'only one owner'.

3. Formally Disputed Points

10.78 A robust consultation cannot be carried out at this stage as key evidence that requires to be known is not available, including:

- Site ownership details for vacant and derelict land

- Findings of the Brownfield Urban Capacity Study
- 'Scottish City Centres: Reduce Vacant/Derelict Land and Property (Dundee)' report

DCC Response

10.79 As outlined in the responses above, the proposed brownfield urban capacity study will not be carried out prior to gate check as the information provided through the Call for Ideas stage and the necessary site assessments need to be included in the study to help produce a comprehensive outcome.

10.80 The vacant and derelict land data is now hosted on the City Council's open data portal in GIS format and is included within the evidence report.

10.81 The online link to the Savills report was reinstated as soon as we became aware of the issue and is incorporated into the evidence report. A comprehensive overview of the key barriers to development identified within Dundee are provided in the original topic paper.

Town Centre First and Economy (011)

Issue: Topic / Place	Town Centre First and Economy (DER011)
Information required by the Act regarding the issue addressed in this section	Town and Country Planning (Scotland) (Act) 1997, as amended, Section 15(5) - the principal physical, cultural, economic, social, built heritage and environmental characteristics of the district; - the principal purposes for which the land is used; - the principal economic characteristics of the district; - the principal cultural, social and built heritage characteristics of the district; and - the desirability of maintaining an appropriate number and range of cultural venues and facilities (including in particular, but not limited to, live music venues) in the district.
Links to Evidence	Policy 27 City, Town, Local and Commercial Centres - National Planning Framework 4 (DED201) - Dundee Local Development Plan 2019 (DED088) - Dundee City Centre Strategic Investment Plan 2050 (DED067) - Review of Retailing in Dundee 2023 (DED247) - Scottish City Centres: Increasing Residential Capacity (Dundee) (DED318) Policy 28 Retail - National Planning Framework 4 (DED201) - Dundee Local Development Plan 2019 (DED088) - Review of Retailing in Dundee 2023 (DED247) - Dundee City Centre Strategic Investment Plan 2050 (DED067) - The Town and Country Planning (General Permitted Development and Use Classes) (Scotland) Miscellaneous Amendment Order 2023 (DED290) Policy 30 Tourism - National Planning Framework 4 (DED201) - Dundee Local Development Plan 2019 (DED088) - Dundee City Centre Strategic Investment Plan 2050 (DED067) - Tay Cities Region: Tourism Strategy 2019-2024 (DED351) - Dundee's 5-Year Tourism Strategy 2025-2030 (DED392) - STEAM Report for 2011-2022 (DED268) - Dundee Climate Action Plan (2019) (DED073) - Dundee Climate Change Risk and Vulnerability Assessment (2024) (DED074) Policy 31 Culture and Creativity

- National Planning Framework 4 ([DED201](#))
- Dundee Local Development Plan 2019 ([DED088](#))
- A Culture Strategy for Scotland ([DED366](#))
- A Culture Strategy for Scotland: Action Plan ([DED004](#))
- Dundee: A Creative City 2024 - 2034 ([DED077](#))
- Economic and Social Impact of Dundee's Cultural Strategy and Action Plan ([DED109](#))
- Music to Our Ears: Dundee Music Strategy 2017 - 2020 ([DED197](#))
- Extraordinary Moments Shared: Events Strategy 2024-29 ([DED119](#))
- Tomorrow's Audience Report 2024 ([DED292](#))
- Dundee's Creative Industries Strategy 2017 - 2021 ([DED106](#))
- Dundee Cultural Recovery: A Policy Report 2021 ([DED076](#))
- Dundee Creative Space Survey 2023 ([DED075](#))
- Hapworks ([DED143](#))

Summary of Evidence

Policy 27 City, Town, Local and Commercial Centres

Policy Context

National Planning Framework 4 ([DED201](#))

11.2 NPF4 recognises that our urban centres are socially and culturally important, supporting our productivity and stimulating innovation and investment. They also have a significant opportunity to contribute to Scotland's economic recovery and to achieve a wellbeing economy. However, they are experiencing significant challenges, caused, or accelerated by the pandemic, and require strategic planning to diversify their offer so that they can thrive and become more resilient. Therefore, the Town Centre First principle forms a key component of policy 27, which requires government, local authorities, wider public sector, businesses, and communities to put the health of town centres at the heart of decision making. It seeks to deliver the best local outcomes, align policies, and target available resources to prioritise town centre sites, encouraging vibrancy, equality, and diversity.

11.3 Policy 27 intends to encourage, promote, and facilitate development in our city and town centres, recognising they are a national asset. This will be achieved by applying the Town Centre First approach to help centres adapt positively to long-term economic, environmental, and societal changes, and by encouraging town centre living.

11.4 Successful outcomes through policy delivery would result in centres that are more vibrant, healthy, creative, enterprising, accessible, and resilient places for people to live, learn, work, enjoy and visit. Development is directed to the most sustainable locations that are accessible by a range of sustainable transport modes and provide communities with easy access to the goods, services and recreational opportunities they need.

11.5 The policy sets out the following specific requirements of Local Development Plans:

- LDPs should support sustainable futures for city, town and local centres, in particular opportunities to enhance city and town centres. They should, where relevant, also support proposals for improving the sustainability of existing commercial centres where appropriate.

- LDPs should identify a network of centres that reflect the principles of 20-minute neighbourhoods and the town centre vision.
- LDPs should be informed by evidence on where clustering of non-retail uses may be adversely impacting on the wellbeing of communities. They should also consider, and if appropriate, identify any areas where drive-through facilities may be acceptable where they would not negatively impact on the principles of local living or sustainable travel.
- LDPs should provide a proportion of their Local Housing Land Requirements in city and town centres and be proactive in identifying opportunities to support residential development.

11.6 Implications for planning's Development Management are that development proposals which align with the town centre first approach and enhance and improve the vitality and viability of city, town and local centres will be supported. Such developments which generate significant footfall and are proposed out with these centres will only be supported where a town centre first assessment can justify the departure. The specific requirements of a town centre first assessment are set out on pages 81-82 of NPF4.

11.7 Development proposals for non-retail uses, such as hot food takeaways, betting offices, and high-interest money lenders, will not be supported if further provision of these services will undermine the character and amenity of the area or the health and wellbeing of communities, particularly in disadvantaged areas. Similarly, drive-through developments will only be supported where they are specifically supported in the LDP.

11.8 Residential development proposals which increase town centre living through new build and the re-use or conversion of vacant buildings will be supported. Proposals for re-use and conversion must consider the viability of existing uses and the need to maintain positive ground floor uses and frontages. All proposed residential development must ensure that residential amenity is not detrimentally affected by existing adjacent uses.

Dundee Local Development Plan 2019 ([DED088](#))

11.9 Dundee City Council's current Local Development Plan 2019 (LDP 2019) fully adopts the Town Centre First approach through a group of policies which control and support the city's network of centres. The policies have been identified below, including a note on their relevance.

LDP 2019 Policy	Relevance to NPF4 Policy 27
Policy 7: Tourism and Leisure Developments	Significant visitor attractions and facilities directed to the City Centre unless valid circumstances determine otherwise. Major leisure uses directed towards the City Centre, District Centres and existing leisure parks.
Policy 8: Visitor Accommodation	Visitor accommodation directed towards the City Centre and Central Broughty Ferry area.
Policy 21: Town Centre First Principle	All new or expanded uses that generate significant footfall are directed to the City Centre or a District Centre unless valid circumstances determine otherwise.
Policy 22: City Centre Retail Frontages	Control of use class change and expansion within the City Centre. This policy will be subject to review following amendments to national planning legislation: Use Class Order, and the General Permitted Development Order. Please see paragraph 11.40 for more detail.
Policy 23: District Centres Retail Frontage	Control of use class change and expansion within District Centres. This policy will be subject to review following amendments to national planning legislation: Use Class Order, and the General Permitted Development Order. Please see paragraph 11.40 for more detail.
Policy 24: Goods Range and Unit Size Restrictions	Restriction of goods range and sales areas size at commercial centres and food stores to protect the City Centre and District Centres.
Policy 25: Gallagher Retail Park Extension	Potential for retail park extension at edge of City Centre location.
Policy 26: Local Shopping Provision	Allowance for the upgrading and expansion of local shopping centres and shopping parades.
Policy 27: Public Houses, Restaurants and Hot Food Takeaways	Measures to control the location and function of public houses, restaurants and hot food takeaways within the City Centre and District Centres.

Figure 11.1: Local Development Plan (2019) policy links to NPF4 Policy 27.

Existing Network of Centres

11.10 With reference to Dundee's current LDP 2019, the city, town, local and commercial centres are established within a 'network of centres', which covers the full range of commercial offerings, from the shops and services on high-streets and local community shopping parades, to freestanding supermarket food stores and retail warehouses. The city, district and commercial centres are shown in the map below.

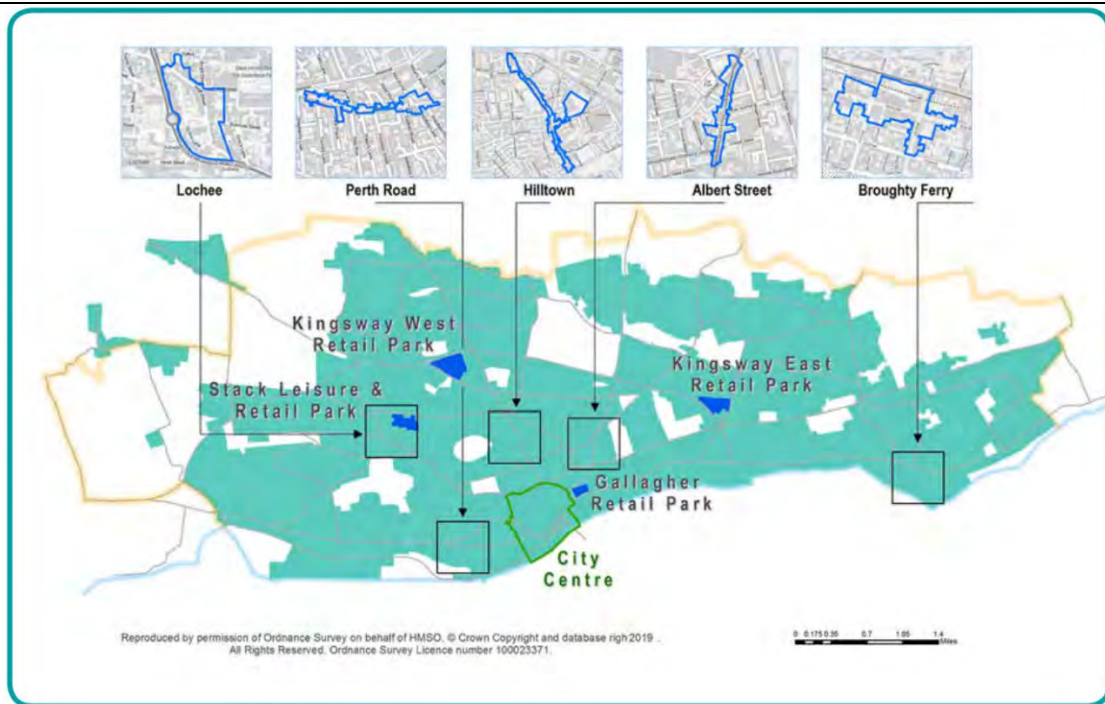


Figure 11.2: Dundee's Network of Centres, Dundee Local Development Plan 2019

Evidence Review

Vacancy Monitoring

- 11.11 Significant economic, environmental and societal changes continue to re-define the city's network of centres. Since the initial shock of the 2007 economic downturn, increasing online sales, the intensifying effects of the Covid19 pandemic, and the ongoing energy, cost of living, and economic crises, the retail and leisure sector continues to contract in traditional shopping areas.
- 11.12 To better monitor commercial vacancies across the city, we are in the process of building a Geographic Information System (GIS) mapping tool which uses the City Council's non-domestic rates data to plot vacant properties. An early prototype of the tool's dashboard is shown below. The tool includes various commercial land-use areas designated by the LDP, including the city, district and commercial centres. This should allow the City Council to monitor vacancy rate trends more readily within our network of centres and across the city.



Figure 11.3: Vacant Property Monitoring Tool (Prototype), Dundee City Council Geographic Information System.

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Review of Retailing in Dundee 2023 (DED247)

11.13 During the first half of 2023 a retail review was commissioned to assess our current policy approach to retail and the actual physical offer, capacity, and success of retail within the city's 'network of centres', with a particular focus on our city, district, and commercial Centres. In response to the requirements of NPF4 Policy 27, the review was also asked to identify any clustering of non-retail uses that may be adversely impacting on the wellbeing of communities. The table below identifies the fast-food takeaways and betting shops located within the city's five District Centre areas.

Dundee District Centres	No. of Fast Food Takeaways	No. of Betting Shops
Albert Street	6	1
Broughty Ferry	7	1
Hilltown	13	2
Lochee	5	3
Perth Road	6	0

Figure 11.4: Number of Fast Food Takeaways and Betting Shops within Dundee's District Centres, Review of Retailing in Dundee 2023

11.14 Around 6 hot food take-away units per district centre is the most common, with the exception of 13 units in the Hilltown, which is twice the average among the other District Centres. Therefore, the Hilltown could be a target if the Council is minded to discourage more take-aways. The city centre area does have multiple fast-food take-aways and betting shops, however, this is a result of the historic nature and function of city centres in general. It is important to highlight that a more comprehensive review of Dundee's food environment, including the fast-food take-away situation, is provided in the Health and Safety schedule (para. 5.56 to 5.74).

11.15 The representation of betting shops across the five district centres is low, with an average of 1.4 units. Lochee is the standout with 3 units.

11.16 The review acknowledges that attempts to limit the number of non-retail uses could prove difficult, and if refused in the district centres, they may spring up elsewhere in the suburbs, such as in corner shops within

residential areas. These uses are also generating customer draw and supporting the local economy of district centres.

11.17 At the time of the retail review, there were no high-interest money lending premises identified within the district centres or city centre. Subsequently, money lending premises have opened in some district centres (one on the Perth Road, one in Lochee High-Street, and one on Reform Street in the city centre), however these numbers do not appear to be on a level that could be defined as clustering.

11.18 The majority of existing drive-thru's in Dundee are sited at established locations such as superstores or commercial centres which already attract customer expenditure and private car traffic. The distribution of drive-thru's forms a ring around the city, so there is no obvious gap in provision geographically. We therefore consider that Dundee is well provided-for in terms of the number of drive-thru restaurants and their distribution, and doubt there is a need to allocate new sites in the proposed plan.

Dundee Liveable Neighbourhoods

11.19 As part of the preparation for the next Local Development Plan, the Planning team is developing a GIS Liveable Neighbourhoods Tool. The tool will inform the incorporation of 20-minute neighbourhood and local living concepts into policy to enhance service delivery and to improve the quality of life for local residents. Further detail on the Liveable Neighbourhoods project can be found in Schedule 7 Infrastructure First and Local Living, (para. 7.29 to 7.35). The Liveable Neighbourhoods Tool will be particularly useful for assessing and supporting the city's network of centres.

Dundee City Centre Strategic Investment Plan 2050 ([DED067](#))

11.20 In response to the challenges facing Dundee's city centre, a long-term strategic investment plan was approved at Committee during the summer of 2023. The plan involved significant periods of research, development, external consultant collaboration, and stakeholder consultation over a number of years. The plan aims to create a more thriving, liveable, city centre and to increase the opportunities for employment, leisure, tourism, and residential uses. There are significant opportunities for mixed-use development in and around Dundee's city centre. Various vacant, underused, and strategic sites and buildings have been identified as opportunities for mixed-use development. Most of the sites provide significant opportunities to increase the city centre's residential population, services, leisure and tourism offer, and employment opportunities.

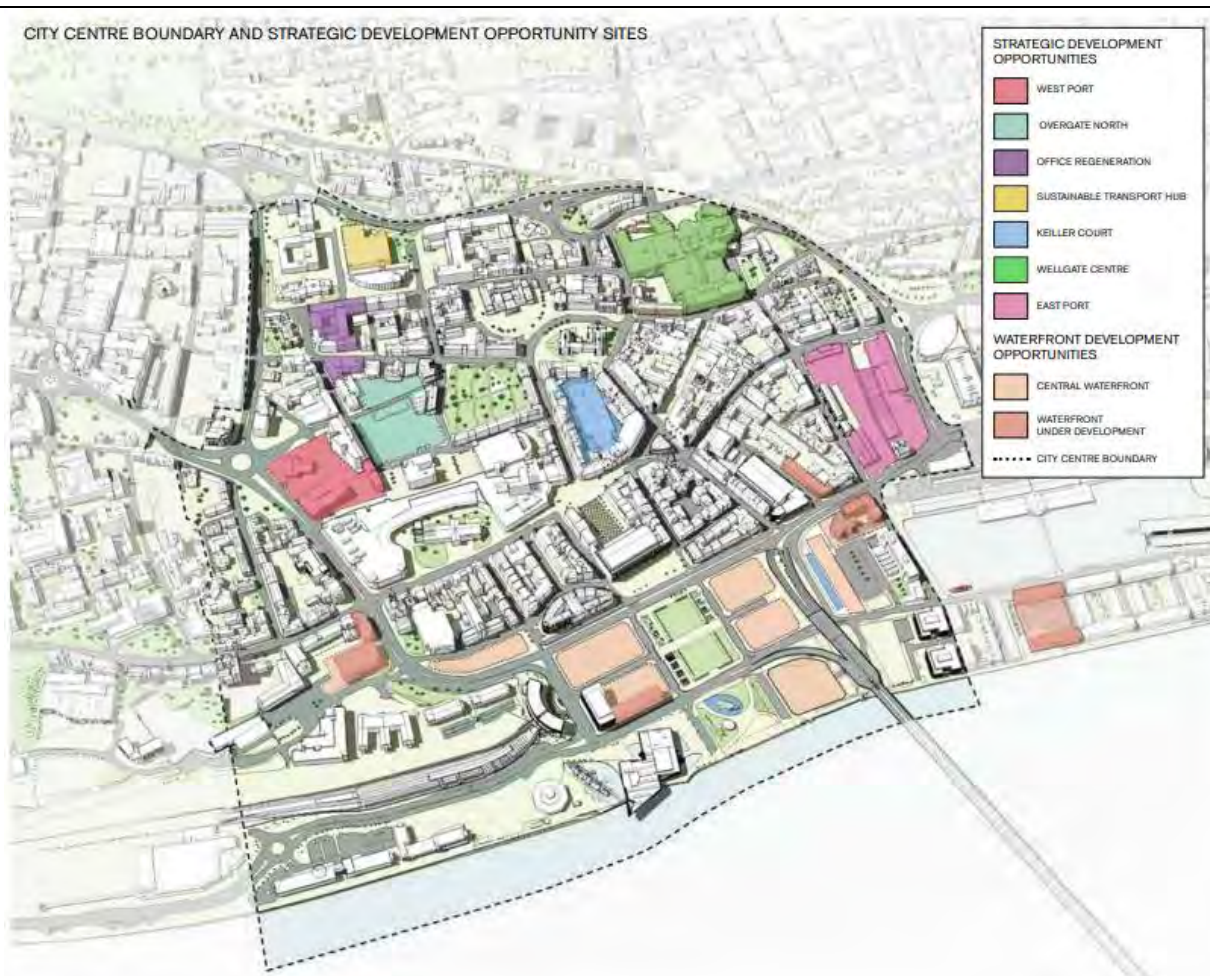


Figure 11.5: Dundee City Centre Strategic Development Opportunities, Dundee City Centre Strategic Investment Plan 2050

11.21 Importantly, the plan is a City Council backed plan which influences many of its service areas. As an example, this has resulted in the Strategic Housing Investment Plan 2023 referencing the plan and committing to prioritise development opportunities within the city centre in future years.

11.22 The plan also fulfils its role as a promotional tool to raise awareness of the Council's ambition for the city centre with a wide range of investors and developers. This has led to multiple in-person presentations, discussions and site visits. This increases investor confidence in the city centre as there is an established vision and plan for the future, and it is notable that progress is being made on some of the strategic sites identified. Further information on the plan and supporting information can be found by following this [weblink](#).

Scottish City Centres: Increasing Residential Capacity (Dundee) ([DED318](#))

11.23 The property consultant Savills were commissioned during 2023 by the Scottish Cities Alliance to review Scotland's cities with the intention of increasing residential development across a wide demographic, including student accommodation. The review concluded that Dundee's city centre residential landscape consists of relatively low-value flats, dominated by rental accommodation that serves a young student population. The following diagram breaks down the household proportions for the city centre during 2023.

Tenure	Total Households	Proportion of households
Private rented	1,227	67%
Council/Housing Association (HA)	395	22%
Owner Occupied	206	11%
Total	1,828	100%

Figure 11.6: Number and Proportion of Households in Dundee City Centre

11.24 Housing Association developments have positively increased in recent years, however, private residential development has not. Owner occupation levels continue to be low, with under 50 (new and second-hand) private sales per annum since 2015. Low rental values in the city centre disincentivise private sector investment in residential accommodation, particularly given the recent rise in inflation having a significant impact on construction costs. However, rent levels are increasing since the low point around 2020 and have surpassed previous growth rates since 2012, as demonstrated in the graph below. Consequently, we are experiencing increased interest from investors and developers interested in city centre housing.

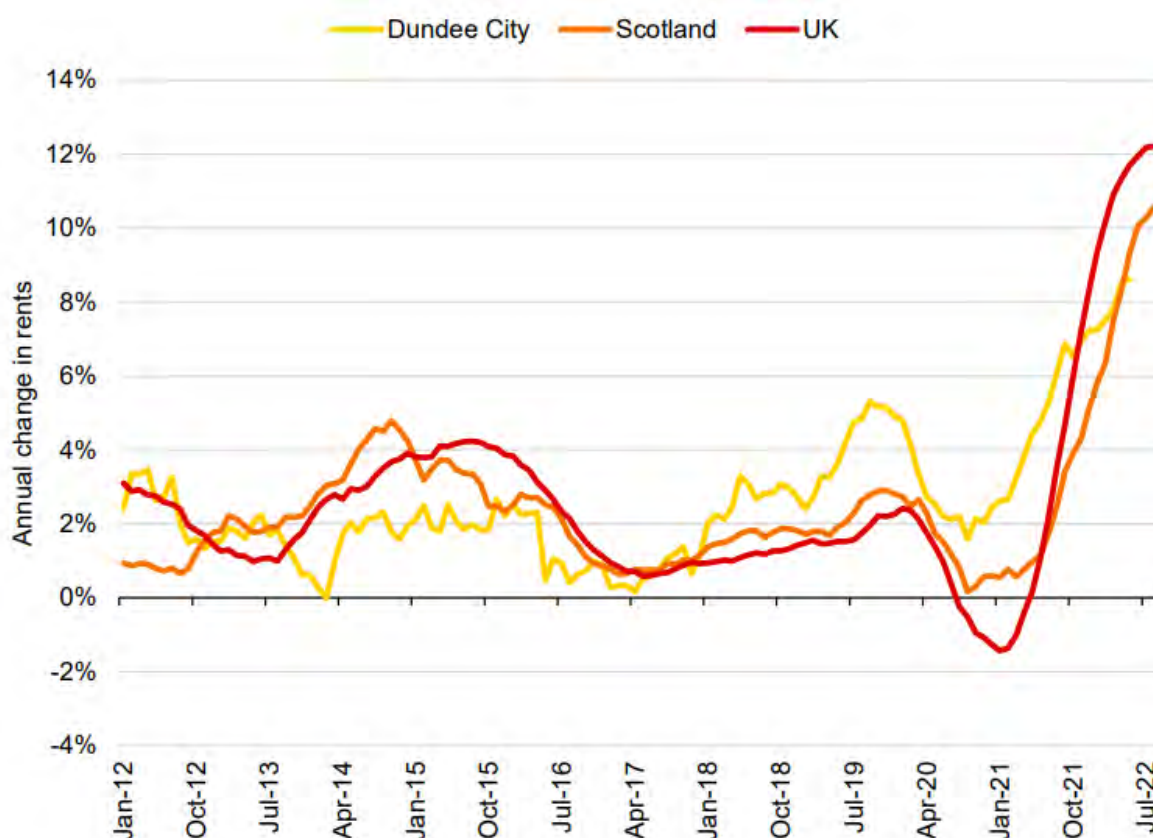


Figure 11.7: Residential Rental Growth in Dundee, Scotland and UK since 2012

11.25 Given the cost issues associated with private residential developments and the slower returns on investment, purpose-built student accommodation has been the preferred residential investment option over recent years. From April 2021 to March 2025, two purpose-built student accommodation (PBSA) projects have been completed, providing 202 student beds of accommodation. Two approved permissions are currently being constructed on the north-eastern edge of the city centre, providing a further 459 beds. During

the same period, eight PBSA planning applications have been approved, creating a live pipeline of 1,931 student beds with planning approval. There are two other live planning applications for up to 60 student beds and the Council has received Proposal of Application Notices for 800 further student beds across three other sites, and pre-application enquiry for 894 student beds across two other sites. This creates a potential pipeline of circa 3,600 student beds.

11.26 To stimulate private sector residential development, Savills recommend various public sector actions. The following list identifies recommendations which relate to the next LDP:

1. Production of a series of masterplans and development frameworks to guide the development and provide reassurance to developers.
2. Prepare an infrastructure delivery plan.
3. Annual inner city centre housing targets developed via the next LDP.

Policy 28 Retail

Policy Context

National Planning Framework 4 ([DED201](#))

11.27 NPF4 recognises that retail plays a vital role in creating productive spaces and supporting 20-minute neighbourhoods. Retail is a key element of the Town Centre First approach and is required to create successful urban centres, the importance of which is set out in the previous evidence base for NPF4 Policy 27 City, Town, Local and Commercial Centres. Consequently, there is a need for strategic planning of retail to support the Town Centre First approach and to deliver the intentions and outcomes of NPF4 policies 27 and 28.

11.28 Policy 28 intends to encourage, promote and facilitate retail investment to the most sustainable locations that are most accessible by a range of sustainable transport modes.

11.29 Successful outcomes through policy delivery would result in retail development and the location of shops supporting vibrant city, town and local centres. Communities can access the shops and goods they need by a range of sustainable transport modes including on foot, by bike, and by public transport, as part of local living.

11.30 The policy sets out the following specific requirements of Local Development Plans:

- LDPs should consider where there may be a need for further retail provision, this may be:
 - o where a retail study identifies deficiencies in retail provision in terms of quality and quantity in an area; or
 - o when allocating sites for housing or the creation of new communities, in terms of the need for neighbourhood shopping, and supporting local living.
- LDPs should identify areas where proposals for healthy food and drink outlets can be supported.

11.31 The implications for Development Management are that development proposals must align with the Town Centre First principle. This means that new retail proposals will be supported in existing city, town and local centres; and in edge-of-centre areas or in commercial centres if they are allocated as sites suitable for new retail development in the LDP. New retail proposals will not be supported in out of centre locations other than small scale neighbourhood development which contributes to local living and 20-minute neighbourhoods, or where it can demonstrate a contribution to the health and wellbeing of the local community.

11.32 Development proposals that are consistent with the above sequential approach will be supported where the proposed development is of an appropriate scale for the location; will have an acceptable impact on the

character and amenity of the area; and is located to best channel footfall and activity, to benefit the place as a whole. As per NPF4 Policy 27, retail proposals which are out of city/town centre, and which will generate significant footfall will also require a Town Centre First Assessment.

Dundee Local Development Plan 2019 ([DED088](#))

11.33 Dundee City Council's current Local Development Plan 2019 (LDP 2019) contains various policies which control and support retail development proposals. The policies have been identified below, including a note on their relevance.

LDP 2019 Policy	Relevance to NPF4 Policy 28
Policy 21: Town Centre First Principle	All new or expanded uses (including retail) that generate significant footfall are directed to the City Centre or a District Centre unless valid circumstances determine otherwise.
Policy 22: City Centre Retail Frontages	Control of use class change and expansion within the City Centre. This policy will be subject to review following amendments to national planning legislation: Use Class Order, and the General Permitted Development Order.
Policy 23: District Centres Retail Frontage	Control of use class change and expansion within District Centres. This policy will be subject to review following amendments to national planning legislation: Use Class Order, and the General Permitted Development Order.
Policy 24: Goods Range and Unit Size Restrictions	Restriction of goods range and sales areas size at commercial centres and foods stores to protect the City Centre and District Centres.
Policy 25: Gallagher Retail Park Extension	Potential for retail park extension at edge of City Centre location.
Policy 26: Local Shopping Provision	Allowance for the upgrading and expansion of local shopping centres and shopping parades.

Figure 11.8: Local Development Plan (2019) policy links to NPF4 policy 28.

Evidence Review

Review of Retailing in Dundee 2023 ([DED247](#))

11.34 The 2023 retail review was specifically commissioned to support the Local Development Plan process. The key requirements of the commission were to review both our current policy approach to retail and the actual physical offer, capacity, and success of retail within the city's 'network of centres', as defined by Dundee's current Local Development Plan 2019, which covers the entire hierarchy of retail offerings, including commercial centres, freestanding food stores, retail warehouses, and the small shopping parades that serve local communities. The review has a particular focus on our City Centre, District Centres and Commercial Centres, and its data and outcomes provide the key source of information for the evidence base. The city, district and commercial centres are shown in the map below.

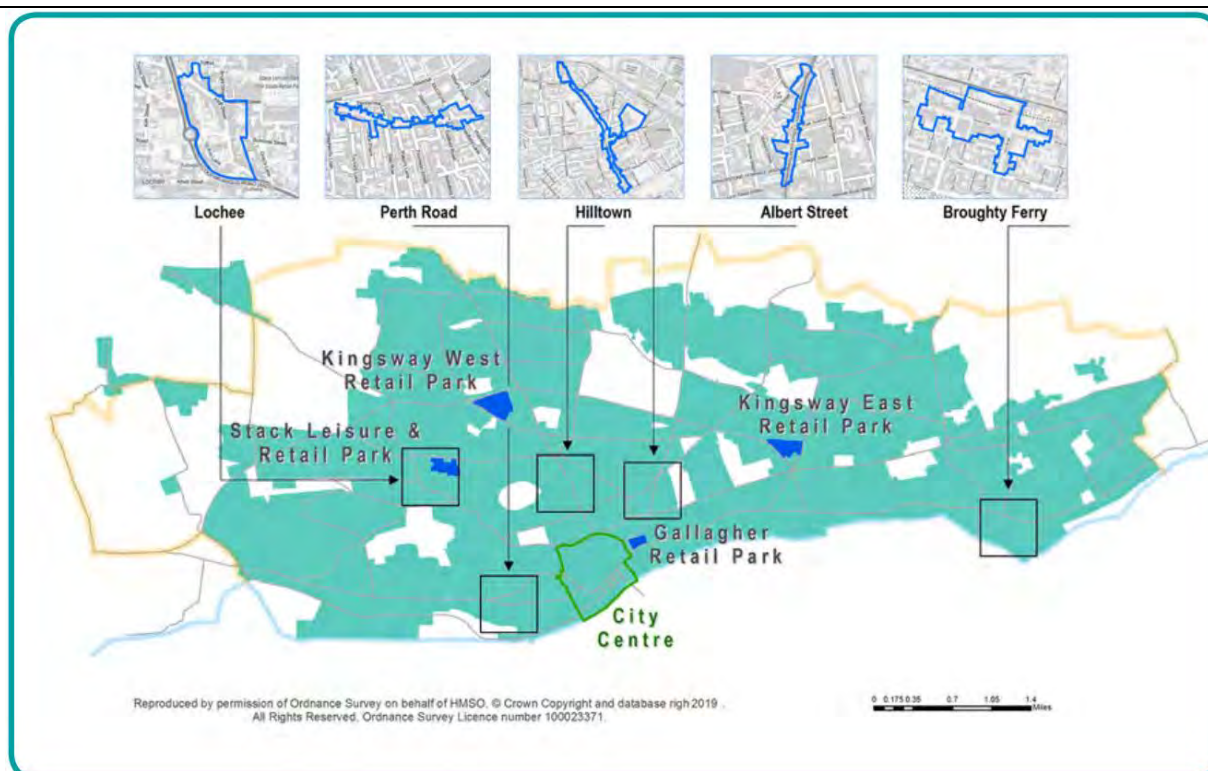


Figure 11.9: Dundee's 'Network of Centres', Dundee Local Development Plan 2019.

Quantitative Forecasts of Convenience and Comparison Retail Floorspace

- 11.35 For clarification, convenience and comparison retail are both associated with products and services which are being sought. However, comparison retail generally relates to products which are of higher value and purchased infrequently, such as vehicles, household goods or clothing. Consumers tend to compare these products before purchasing to maximise value and quality. Conversely, convenience retail is associated with products that are purchased frequently, with minimal effort, and usually of lower value, primarily food products.
- 11.36 Based on expenditure forecasts, the research indicates very low requirements for additional convenience floorspace over the next ten years. The existing provision is greater than the forecast convenience expenditure to support it, so there is current under-trading below average company levels. Therefore, it would be appropriate for the next LDP to support quality upgrades and refurbishment of some convenience floorspace in the City Centre and District Centres, together with support for some additional new neighbourhood shops in 20-minute catchment areas where need is identified.
- 11.37 Based on expenditure forecasts, the research indicates rather limited requirements for additional comparison floorspace over the next ten years. The main reason is the high proportion of existing internet spending on comparison goods generally and in Dundee, with further increases in the proportion up to 2033. Accompanying the forecast is greater uncertainty over the link between projected expenditure growth and equivalent retail floorspace, compared to the past. Market trends in demand for comparison retail floorspace have been downward, fuelled by changes in the way customers are shopping and advances in retail technology. Therefore, it is reasonable for the next LDP to provide for a limited level of new comparison floorspace, mostly associated with mixed-use re-development areas in the city centre over the next ten years.

Retail Provision

11.38 Both NPF4 Policy 27 City, Town, Local and Commercial Centres, and Policy 28 Retail strongly uphold and reinforce the 'Town Centre First' principle. New retail proposals will be supported in existing city, town and local centres. With the exception of small neighbourhood retail provision, retail proposals in out-of-centre locations will be contrary to policy, unless they are proposed in edge-of-centre areas or commercial centres allocated as sites suitable for new retail development in the LDP. This places more onus on LDPs to identify suitable sites. However, based on analysis the retail review does not consider that there is a need to identify additional edge of city centre, district centre, or commercial centre sites for new retail development. Nor is there an advantage in retaining the Gallagher Retail Park extension site in the current LDP (LDP Policy 25 Gallagher Retail Park Extension). There has been no material market interest in developing the site for retail development and the limited forecast retail expenditure capacity would be best directed at fortifying the city centre.

11.39 Mixed-use project areas in the Dundee City Centre Strategic Investment Plan 2050 ([DED067](#)) are a source of guidance on where most new retail development opportunities may best support the vitality and viability of the city centre. The document represents the current vision for the city centre, including the Waterfront area, which is also identified in NPF4 as a national development.

National Planning Legislation Reform

11.40 Dundee City Council's current LDP 'Policy 22 City Centre Retail Frontages' and 'Policy 23 District Centre Retail Frontages' regulate which uses are acceptable in these areas, particularly around 'Class 1 Shops', 'Class 2 Financial and Professional Services' and 'Class 3 Food and Drink'. However, these policies will need to be reviewed following the April 2023 changes to the Use Classes Order (UCO) and the General Permitted Development Order (GPDO). Through amendments to the UCO, former use Class 1 and Class 2 are now combined into a single 'Class 1A Shops, Financial, Professional and Other Services'. To help diversify town centre uses and to allow more freedom to change uses, provided that specific conditions are met, GPDO amendments now provide more permitted development rights to change between Class 1A, Class 3, and Class 4 Business uses.

Restrictions on the range of goods and unit sizes in commercial centres and food stores

11.41 Dundee City Council's current LDP 'Policy 24: Goods Range and Unit Size Restrictions' place restrictions on the city's commercial centres and convenience food stores. Findings from consultations with other local authorities showed a majority in favour of retaining restrictions on the range of goods in commercial centres to protect town and city centres. The review concludes that it is safer to retain restrictions on the range of goods under LDP Policy 24, while remaining open to some adaptation, rather than risk losing control and attracting unwanted trade diversion from the city centre and district centres if restrictions are removed. Similarly, there is merit in retaining restrictions on unit sizes in the commercial centres to reduce the risk of retailer relocations from the city centre and district centres.

Policy 30 Tourism

Policy Context

National Planning Framework 4 ([DED201](#))

11.42 NPF4 recognises that tourism plays a vital role in creating productive spaces and supporting local economies. Tourism is another key element of the Town Centre First approach and helps to create successful urban centres, the importance of which is set out in the previous evidence base for NPF4 Policy 27 City, Town, Local and Commercial Centres. Consequently, there is a need for strategic planning of tourism to

support the Town Centre First approach and to deliver the intentions and outcomes of NPF4 policies 27 and 30.

11.43 Policy 30 intends to encourage, promote and facilitate sustainable tourism development which benefits local people, is consistent with our net zero and nature commitments, and inspires people to visit Scotland.

11.44 Successful outcomes through policy delivery would result in communities and places enjoying economic, social and cultural benefits from tourism, supporting resilience and stimulating job creation.

11.45 The policy sets out the following specific requirements of Local Development Plans:

- LDPs should support the recovery, growth and long-term resilience of the tourism sector. The spatial strategy should identify suitable locations which reflect opportunities for tourism development by taking full account of the needs of communities, visitors, the industry and the environment. Relevant national and local sector driven tourism strategies should also be taken into account.
- The spatial strategy should also identify areas of pressure where existing tourism provision is having adverse impacts on the environment or the quality of life and health and wellbeing of local communities, and where further development is not appropriate.

11.46 The implications for planning's Development Management are that development proposals for new or extended tourist facilities or accommodation will be supported in locations identified within the LDP. Tourism related development should take into account the following points:

- Contribution made to the local economy;
- Compatibility with the surrounding area in terms of the nature and scale of the activity and impacts of increased visitors;
- Impacts on communities, for example by hindering the provision of homes and services for local people;
- Opportunities for sustainable travel and appropriate management of parking and traffic generation and scope for sustaining public transport services particularly in rural areas;
- Accessibility for disabled people;
- Measures taken to minimise carbon emissions; and
- Opportunities to provide access to the natural environment.

11.47 Development proposals that involve the change of use of a tourism-related facility will only be supported where it is demonstrated that the existing use is no longer viable and that there is no requirement for alternative tourism-related facilities in the area. Development proposals for the reuse of existing buildings for short term holiday letting will not be supported where the proposal will result in an unacceptable impact on local amenity or area character; or where the loss of residential accommodation is not outweighed by demonstrable local economic benefits.

Dundee Local Development Plan 2019 ([DED088](#))

11.48 Dundee City Council's current Local Development Plan 2019 (LDP 2019) contains several policies which control and support tourism development proposals. The policies have been identified below, including a note on their relevance.

LDP 2019 Policy	Relevance to NPF4 Policy 30
Policy 7: Tourism and Leisure Developments	Significant visitor attractions and facilities directed to the City Centre unless valid circumstances determine otherwise.

	Major leisure uses directed towards the City Centre, District Centres and existing leisure parks.
Policy 8: Visitor Accommodation	Visitor accommodation directed towards the City Centre and Central Broughty Ferry area.
Policy 21: Town Centre First Principle	All new or expanded uses (including tourism) that generate significant footfall are directed to the City Centre or a District Centre unless valid circumstances determine otherwise.

Figure 11.10: Local Development Plan 2019 policy links to NPF4 Policy 30.

Evidence Review

Tourism Performance Data

11.49 In June 2023 Dundee City Council received its annual STEAM Report for 2011-2022 ([DED268](#)). The STEAM report, by Global Tourism Solutions (UK) Ltd, provides detailed modelling of the economic impact of tourism on the city. Further detail on the modelling method can be found on the company's [webpage](#). The following infographics provide a summary of the key changes for 2022 compared against data from 2021, and 2019 for a pre-COVID comparison. The 2019 comparison provides a more realistic view of the changes; however, it is also positive to see the significant bounce-back from the negative impacts experienced under the COVID pandemic in the 2021 comparison. Positively, the key statistics are heading in the right direction for the city, even the downturn in day visitors and day spend is offset by the overall increase in visitors and spend generated through increased overnight stays.

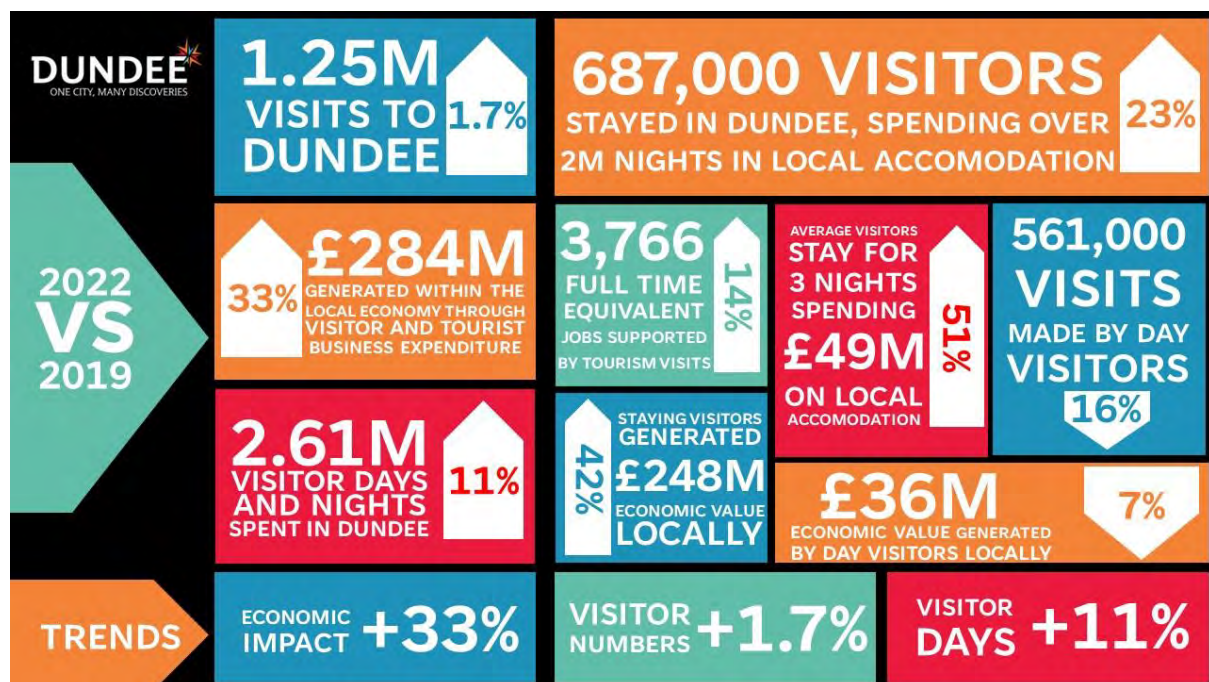


Figure 11.11: Summary of Tourism's Economic Impact on Dundee 2019 vs 2022, Dundee STEAM Report 2011-2022

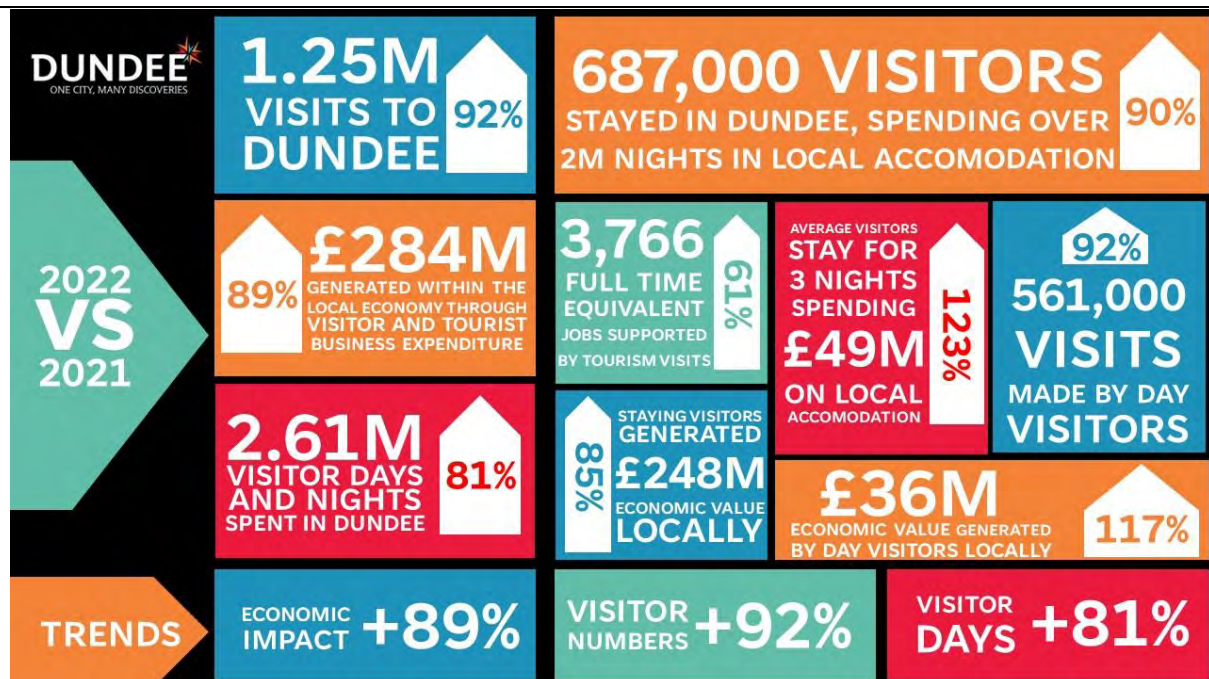


Figure 11.12: Summary of Tourism's Economic Impact on Dundee 2021 vs 2022, Dundee STEAM Report 2011-2022

11.50 Since publication of the initial evidence, Dundee City Council has received another annual STEAM Report for 2011-2023. Positively, this latest data reveals that tourism contributed more than £290million to the Dundee economy and more people visited the city and spent more money than in the previous year. The economic impact of the sector in 2023 is also up by 36% on 2019, the last full year before Covid and its devastating disruption to the economy. Total annual visitors to Dundee have increased by 10% over the same period to 1.35million, including a 27% rise in people staying overnight. Around half of the economic impact was in the accommodation and food and drink sectors, with retail, recreation and transport also benefiting. Direct employment in the tourism sector increased by 6.3%, from 2502 posts in 2019 to 2659 last year.

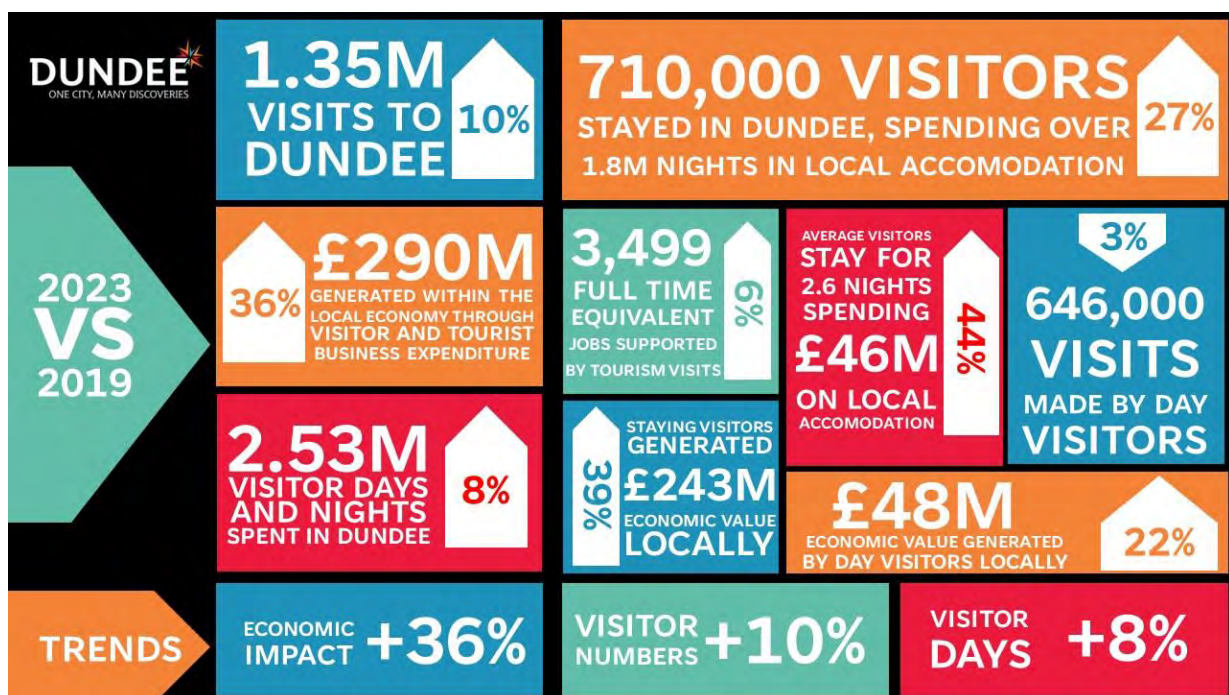


Figure 11.13: Summary of Tourism's Economic Impact on Dundee 2019 vs 2023, Dundee STEAM Report 2011-2023

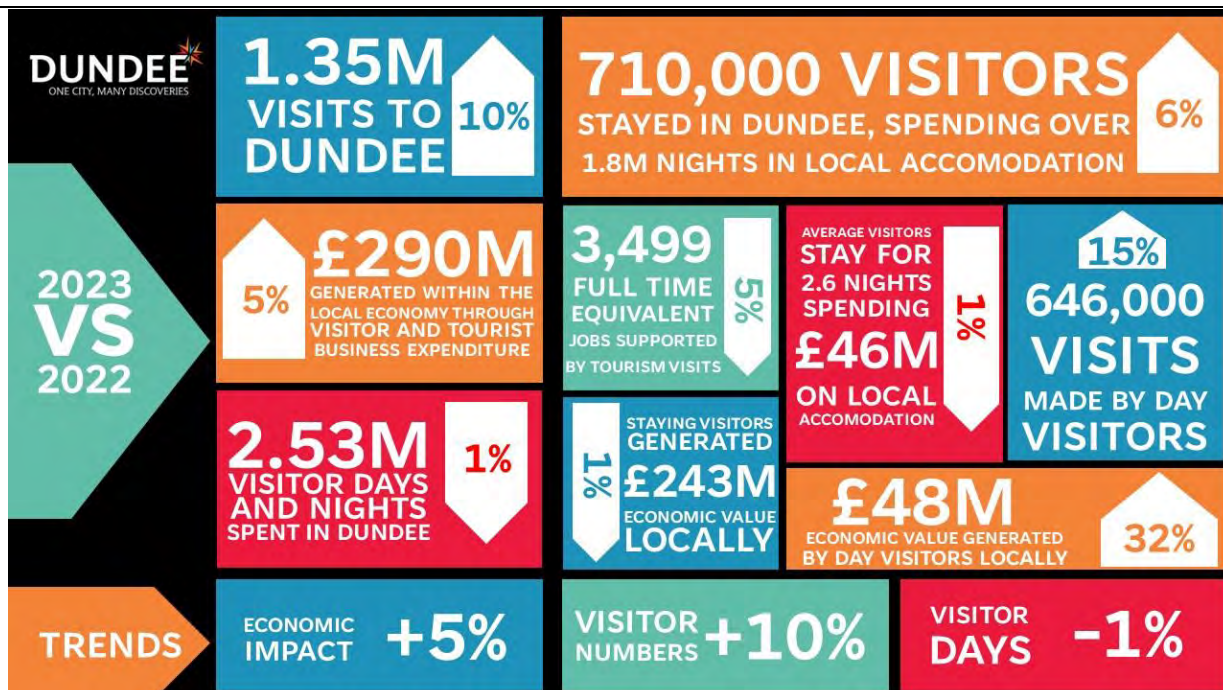


Figure 11.14: Summary of Tourism's Economic Impact on Dundee 2022 vs 2023, Dundee STEAM Report 2011-2023

Tourism Strategies

11.51 The following regional and local strategies play a significant role in the future development of Dundee's tourism sector.

Tay Cities Region: Tourism Strategy 2019-2024 ([DED351](#))

11.52 This strategy focuses on collectively growing the volume and value of the tourism sector across the four distinct areas that line the River Tay (Angus, Dundee, North East Fife, and Perth and Kinross) to support the business, employment and place-based themes established in the Tay Cities Region Economic Strategy ([DED283](#)).

11.53 Playing to the area's competitive strengths, identified as 'Connectors', is the key to success in the Tay Cities Region. These strengths include the variety and density of attractions, its natural environment, the River Tay connection and activities, a growing network of major attractions, and an environmental climate which favours visitors and food production.

11.54 The three Connector themes are listed below. Please refer to the document for further detail and the list of priority actions assigned to each Connector.

- Connector 1 Culture and the Creative Industries
- Connector 2 Food and Drink
- Connector 3 Outdoor Adventures

11.55 The importance of strengthening the tourism sector across the Tay Cities Region is highlighted through four key aspects:

1. Building our Capabilities
2. Improving the Customer Journey
3. Supporting Leadership and Collaboration
4. Leadership, Governance and Delivery

11.56 Following review of the associated priority actions for the above aspects, 'Improving the Customer Journey' is more applicable from a Planning and LDP perspective. The priority actions are set out below.

11.57 Improving the Customer Journey

1. Work with partners to take advantage of the region's SMART Transport Hub investment to pilot innovative transport solutions including CAVs (Connected Autonomous Vehicles).
2. Investigate collaborative solutions to ensure seamless visitor experience across the region and the 'final mile' from public transport to the front door.
3. Maximise government investment into World Class digital infrastructure across the region, ensuring businesses have skills and capabilities to use it.
4. Clearly articulate gaps in regional tourism infrastructure and collaborate with national agencies to encourage appropriate investment (such as hotels, attractions etc).
5. Support businesses across the region to benefit from Tay Cities Deal infrastructure investment to help futureproof services and products.

Dundee's 5-Year Tourism Strategy 2025-2030 ([DED392](#))

11.58 Tourism strategy sub-groups, involving key local businesses and organisations across the tourism sector, were formed to shape and deliver the latest tourism strategy. This partnership working is vital to ensure that the needs of tourists and the industry are being addressed. The strategy's agreed Vision, Ambition and Strategic Priorities are set out below.

Vision

11.59 Tourism makes a significant contribution to making Dundee a thriving, prosperous place that provides a high standard of living to local residents, supports a buzzing cultural scene and vibrant tourism businesses across hospitality, accommodation, events, attractions and unique experience providers. This helps to cement Dundee's international reputation as an inclusive, forward-thinking city with a rich history of innovation and access to spectacular natural assets.

Ambition

11.60 Dundee will be acclaimed as Europe's Best Emerging City Break Destination by 2030, offering a high-quality, compelling range of activities and experiences that will attract visitors, all year round.

Key Tourism Objectives

11.61

- Contribute to a thriving economy by growing and supporting good quality, sustainable jobs and driving visitor spending year-round.
- Increase dwell time in the city to additional half days, days and overnight stays, according to visitor profile.
- Increase bed nights all year round with Dundee offering a compelling range of year-round activities and experiences that convince visitors to stay for a short break.
- Continue to enhance the overall reputation of the city and change perceptions by offering a unique, consistently high quality, engaging experience for visitors and marketing the city's diverse experiences with pride.
- Take an inclusive approach by continually involving and engaging residents of all backgrounds in the growing range of cultural attractions and sector development, expanding their role as the city's best ambassadors.
- Grow sustainability as a strength by supporting visitors and businesses to act in responsible ways that have a positive impact on the city's environment, communities and economy.

Strategic Priorities

11.62

1. Help Dundee's people to prosper from a thriving visitor economy.
(‘Our Passionate People’)
2. Create and develop a thriving city together.
(Our Thriving Places’)
3. Engage visitors with high quality experiences that play to our strengths as a city.
(‘Our Memorable Experiences’)
4. Build business resilience, sustainability and profitability in Dundee's visitor economy.
(‘Our Diverse Business’)

Dundee City Centre Strategic Investment Plan 2050 ([DED067](#))

11.63 Visiting (tourism) is one of the plan's five interconnected themes, alongside Living, Working, Connectivity, and Public Realm. These five themes form the core of the plan for the future of the city centre. Each theme is comprised of an ambition statement, strategic outcomes, and multiple actions. The vision and strategic outcomes are set out below. Please refer to the plan for further information and a list of the theme's actions.

Ambition: Develop Dundee city centre into a world class destination loved by locals and visitors alike and double the number of visitors and visitor spend in the next 10 years.

Strategic Outcome 1: Develop a wider range of activities for locals and visitors of all ages including leisure, entertainment, cultural, live music, and evening economy initiatives.

Strategic Outcome 2: Big attractions like V&A Dundee, and potentially Eden Scotland, bring significant numbers of people into the city, which benefits the tourism and hospitality sector overall. Support the development of new and existing visitor attractions, to extend the city centre's reach at national and international level and increase overnight stays.

Strategic Outcome 3: Develop our visitor offer in a sustainable way, recognising and balancing the needs of locals, visitors and the environment. We want sustainable growth which brings in more visitors but not at the expense of local amenity.

Business Events

- 11.64 Business events are delivered by the [Dundee City Region Convention Bureau](#) (DCRCB) through their [Pathfinders Programme](#). In partnership, the Pathfinder Community (academic and research institutes across the region) and Partners (venues, accommodation providers and services across the region) bid for and deliver national and international conferences, meetings and congresses, which generate significant investment into the local economy and actively support 4 key [impact pillars](#): Incredible Impacts (for host destination and community), Sustainability, Health & Wellbeing, and Inclusion. The DCRCB is very successful at delivering major events in the city/region, with many events scheduled throughout 2026 and beyond. However, through further discussion with the DCRCB's business events manager, there are infrastructure challenges associated with large scale events. Dundee lacks a large-scale, dedicated, conference centre to facilitate international events, which could bring significant financial benefits to the city. Currently in Dundee, large-scale events with more than 375 delegates require a multi-venue approach, which is generally unattractive to national and international academic and research conferences as they prefer a single venue approach.
- 11.65 There are also hotel capacity issues associated with large scale events, e.g. during the 2023 Karate World Championships all attendees could not be accommodated in Dundee. Hotels in St Andrews and Perth were used to accommodate attendees. This also results in a financial loss to the city. The last hotel demand study was carried out in 2017, therefore a more up-to-date study would be useful to review the current situation and to forecast demand, particularly considering the potential Eden Project and associated increase in visitor numbers.

Dundee Climate Action Plan (2019) ([DED073](#))

- 11.66 This plan makes reference to the Risk and Vulnerability Assessments carried out for ten policy sectors, including tourism, to determine the nature and extent of climate related risks. Within the most recent Climate Change Risk and Vulnerability Assessment (2024) ([DED074](#)), tourism is covered within the Business and Industry section, with the potential for risk assessed against both 2°C and 4°C scenarios of temperature increase. The key findings related to impacts on tourism include increased flooding, storm damage and business closure, and the knock-on effects of the general decline in winter tourism through reduced snowfall and higher winter temperatures.

Health and Wellbeing of Local Communities: Short Stay Accommodation

- 11.67 In recent years, short stay accommodation (short-term lets) has become a sensitive issue for specific locations in Scotland due to the potential negative impacts on housing availability, local communities, safety, and private amenity spaces. NPF4's policy on short-stay accommodation aims to protect local communities and their assets.
- 11.68 Dundee has not introduced a short term let control area as the level of short stay accommodation is relatively low. Data on applications for short stay accommodation is held by the City Council's licencing department.
- 11.69 With the exception of small-scale B&B and guesthouse style accommodation, Dundee's current LDP2019 Policy 8: Visitor Accommodation does not support additional accommodation outside the city centre and central Broughty Ferry areas, in order to preserve established tourism accommodation. To date, Dundee has only had one short term let planning application refused. This related to an application in a block of flats in

the City Quay area on the edge of the city centre. The application was refused at Committee, and this decision was then upheld at appeal by the Division of Planning and Environmental Appeals.

Policy 31 Culture and Creativity

Policy Context

National Planning Framework 4 ([DED201](#))

- 11.70 NPF4 recognises that culture and creativity play a vital role in creating productive spaces and supporting local identity, character, communities, and economies. Culture and creativity also contribute to the Town Centre First approach and helps to create successful urban centres, the importance of which is set out in the previous evidence base for NPF4 Policy 27 City, Town, Local and Commercial Centres. Consequently, there is a need for strategic planning of culture and creativity to support the Town Centre First approach and to deliver the intentions and outcomes of NPF4 policies 27 and 31.
- 11.71 Policy 31 intends to encourage, promote and facilitate development which reflects our diverse culture and creativity, and to support our cultural and creative industries.
- 11.72 Successful outcomes through policy delivery would result in locally distinctive places which reflect the diversity of communities and support regeneration and town centre vibrancy; cultural and creative industries expanding, providing jobs and investment; communities having access to cultural and creative activities.
- 11.73 The policy specifically requires that Local Development Plans should recognise and support opportunities for jobs and investment in the creative sector, culture, heritage and the arts.
- 11.74 The implications for planning's Development Management are that development proposals which involve a significant change to existing, or the creation of new, public open spaces will make provision for public art, which reflects diversity, culture and creativity.
- 11.75 Development proposals for creative workspaces or other cultural uses that involve the temporary use of vacant spaces or property will be supported. Development proposals that would result in the loss of an arts or cultural venue will only be supported where:
- there is no longer a sustainable demand, or
 - the venue no longer meets the needs of users and cannot be adapted, or
 - alternative provision of equal or greater standard is made available at a suitable location within the local area, and
 - the loss of the venue does not result in loss or damage to assets or objects of significant cultural value.
- 11.76 Development proposals within the vicinity of existing arts venues will fully reflect the agent of change principle and will only be supported where they can demonstrate that measures can be put in place to ensure that existing noise and disturbance impacts on the proposed development would be acceptable and that existing venues and facilities can continue without additional restrictions being placed on them as a result of the proposed new development.

Dundee Local Development Plan 2019 ([DED088](#))

11.77 Dundee City Council’s current Local Development Plan 2019 (LDP 2019) contains several policies which control and support cultural and creative development proposals. The policies have been identified below, including a note on their relevance.

LDP 2019 Policy	Relevance to NPF4 Policy 31
Policy 2: Public Art Contribution	Developments with construction costs of £1 million or over are required to allocate at least 1% of construction costs for the inclusion of public art.
Policy 7: Tourism and Leisure Developments	Significant visitor attractions and facilities directed to the City Centre unless valid circumstances determine otherwise. Major leisure uses directed towards the City Centre, District Centres and existing leisure parks.
Policy 21: Town Centre First Principle	All new or expanded uses that generate significant footfall are directed to the City Centre or a District Centre unless valid circumstances determine otherwise.

Figure 11.15: Local Development Plan 2019 Policy Links to NPF4 Policy 31

Evidence Review

Dundee Creative Industries General Statistics

11.78 Based on statistical data presented through the Scottish Government’s [Industry Statistics](#), during 2023 there were 240 creative industry businesses registered in the Dundee Local Authority area, and during 2022 there were 3,535 people employed throughout the creative industries. When comparing the 2021 total turnover figures for the key growth sectors, notwithstanding the ‘disclosive data’ for Life Sciences, Dundee’s creative industries came out on top at £291.9m, as shown in the table below. This data highlights the importance of the creative industries to Dundee’s employment and local economy.

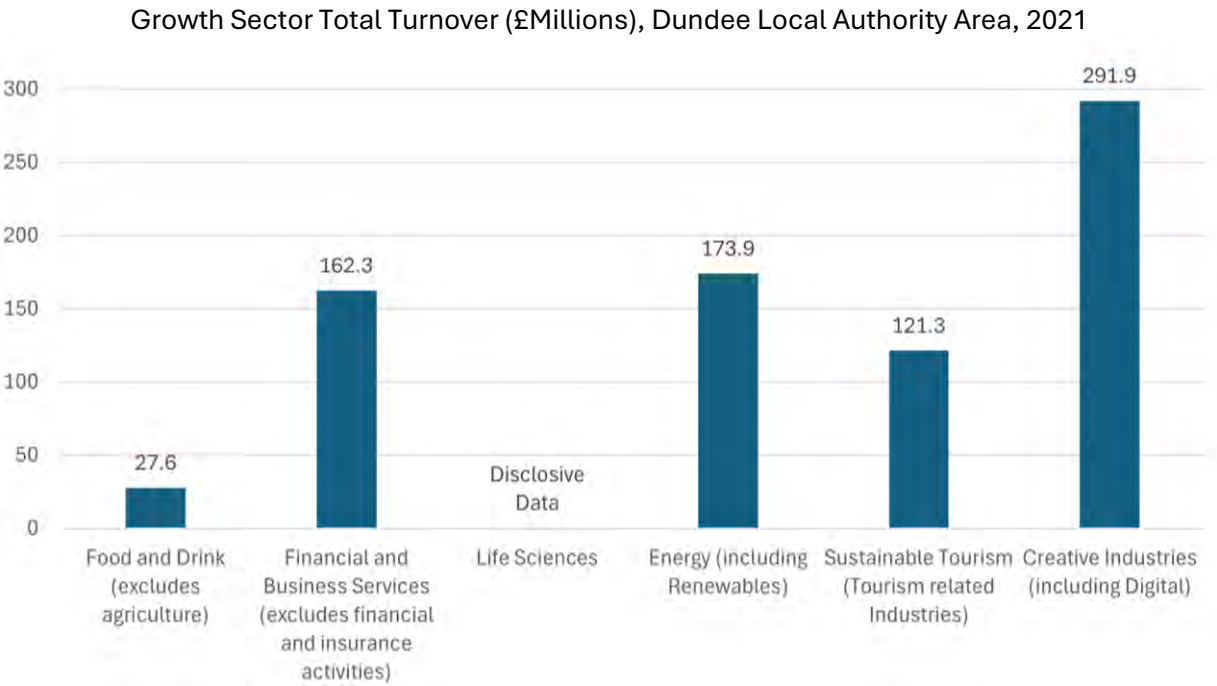


Figure 11.16: Scottish Government, Industry Statistics, Local Authority Area Statistics Database

Note: When considering the lack of data on Dundee's Life Sciences turnover, it is worth noting that the available Life Sciences turnover figures for the city areas of Aberdeen, Glasgow and Edinburgh were all significantly lower than their Creative Industries total turnover.

A Culture Strategy for Scotland ([DED366](#))

11.79 This national strategy from 2020 acknowledges the role that culture must have at the centre of society and government, with a focus on harnessing the power of culture to strengthen communities and transform lives; to improve health and wellbeing; to contribute to growing the economy with products, services, jobs and investment; and to bring creative approaches to design better communities.

11.80 The strategy includes three key ambitions with associated aims and actions:

1. Strengthening Culture

Sustaining and nurturing culture to flourish and to evolve as a diverse, positive force in society, across all of Scotland.

2. Transforming Through Culture

Demonstrating that culture is central to Scotland's wellbeing and cultural, social, economic and environmental prosperity.

3. Empowering Through Culture

Celebrating culture as part of every community; essential to our lives and wellbeing.

11.81 The strategy's ambitions identify the strong role that culture can play in delivering lasting improvements for communities, particularly through place-based, community-led, cultural activities. Culture can contribute to many of the often deep-rooted and complex themes that Local Community Planning Partnerships typically prioritise in their Local Outcomes Improvement Plans, such as inclusive growth, improving employment prospects, positive physical and mental health, children's wellbeing and sustaining fragile communities.

A Culture Strategy for Scotland: Action Plan ([DED004](#))

11.82 Building on the vision set out in the cultural strategy, an action plan has since been published to provide a roadmap to delivering a strong, resilient culture sector, and to support a cultural landscape where everyone benefits and gets to take part. The action plan is centred around the original three key themes of strengthening, transforming and empowering, with the addition of the overview theme of resilience. Multiple actions are set out against the four themes, including maximising the impact of existing public sector support; championing the economic impact of culture, particularly within the context of community wealth building and creative placemaking; embedding culture at the centre of policy-making; and amplifying the important role community-based cultural assets such as libraries, museums and galleries can play in strengthening and empowering communities.

Dundee: A Creative City 2024 - 2034 ([DED077](#))

11.83 The strategy's vision and mission positions Dundee as a creative hub that celebrates diversity, embraces innovation, and inspires collaboration. It envisions culture as central to shaping city plans, policy and placemaking, with the transformative power of creativity driving Dundee's ambition, reputation, economy and potential as an internationally recognised yet locally rooted centre of excellence.

11.84 The strategy's four strategic outcomes are summarised below. Multiple actions to deliver the outcomes are included in the strategy.

Outcome 1: Inspire Future Possibilities Positions culture as central to Dundee's success, weaving creativity through city policies to address priorities like tackling poverty, economic growth, and climate action. Culture drives tourism, attracts investment, and delivers health and wellbeing outcomes while maintaining the city's international reputation.

Outcome 2: Implement Equity of Opportunity Ensures everyone can participate in cultural life through inclusive programming, community engagement, and accessible activities. The strategy emphasises reaching all city wards, supporting young people, addressing social justice issues, and celebrating diverse cultural expressions including ongoing decolonisation work.

Outcome 3: Ignite Ambition and Creativity Supports artists and creative practitioners through career development, fair work practices, and accessible spaces for creation and performance. Despite a 50% increase in commissions (96 to 144), employment opportunities for artists declined by 27% (276 to 201 posts), highlighting the need for workspace solutions and sustainable creative careers.

Outcome 4: Innovate to Strengthen, Sustain and Prosper Focuses on organisational sustainability, with the sector generating combined income of approximately £18.5 million (46% earned/private donated, 13% from local authority investment). Emphasises climate action, circular economy practices, and maintaining building infrastructure while advocating for continued public investment.

Economic and Social Impact of Dundee's Cultural Strategy and Action Plan ([DED109](#))

11.85 During 2018 an external audit of the economic and social impact of the Dundee's previous [Cultural Strategy 2015-2025](#) was carried out by the consultancy firm Ekosgen (now Growth Company Group).

11.86 Importantly, the report demonstrates the considerable economic impacts and benefits generated by organisations engaged in cultural delivery in Dundee. For financial year 2016/17 this is estimated to have contributed £30.5m gross value added and supporting 1,011 full-time equivalent jobs.

11.87 The cultural activity delivered by organisations in Dundee has secured wide-ranging engagement from residents, community groups, schools and pupils, and groups with protected characteristics. This has generated a variety of social and wider community impacts, which in headline terms includes the following:

- Engagement of volunteers generating a total economic contribution of almost £736,000;
- Potential for the volunteers to have experienced health and wellbeing benefits worth up to almost £2.3 million; and
- Wellbeing and educational benefits of up to £16.3 million per annum realised as result of audiences and participants engaging with culture and the arts.

Music to Our Ears: Dundee Music Strategy 2017 – 2020 ([DED197](#))

11.88 This is Dundee's first ever music strategy, which was led by Leisure & Culture Dundee and prepared by the Dundee Place Partnership in collaboration with the city's musicians, venue owners, management companies, producers, record labels, promoters, community groups, technicians, teachers, tutors, record stores, and cultural organisations. The strategy fulfils an action plan requirement of Dundee's previous

[Cultural Strategy 2015 – 2025](#), and its overarching aim is to make Dundee a better place to hear, perform and learn music.

11.89 The strategy made three commitments to be taken forward in 2017 – 2020, as set out below, which were supported by an action plan.

1. GROWING OPPORTUNITIES: We are committed to making the music sector in Dundee strong, sustainable and ambitious for its musicians and its venues.
2. DEVELOPING AUDIENCES: We are committed to growing the number of people attending live music in Dundee as we build Dundee's reputation as a place to experience live music.
3. IMPROVING PROMOTION: We are committed to making sure that audiences are able to quickly, easily and effectively access information about live music.

11.90 Up until 2019 the strategy was being progressed and monitored; however, progress has faltered following the conclusion of the Dundee Place Partnership and the events and aftermath of the COVID-19 pandemic.

Extraordinary Moments Shared: Events Strategy 2024-29 ([DED119](#))

11.91 During March 2024, Dundee City Council launched its new events strategy. The Strategy recognises the importance of events for the wellbeing and cultural identity of its citizens, for creating a thriving, attractive and welcoming city, and for providing vital support for the local economy, and creative and tourism sectors.

Vision: Support the development of a diverse programme of events, attracting events to Dundee and enabling events led by partners, throughout the year contributing to local pride and a city that is a thriving, vibrant, contemporary place to live, work, study and invest.

Mission: Use events to further enhance Dundee's positive reputation and foster opportunities for all, through a varied calendar of events across all seasons, contributing to economic, community and social prosperity.

11.92 Recent success stories covered through four case studies positively highlight the post-pandemic recovery that is taking place in the city. The case studies include BBC Radio 1's Big Weekend in Dundee, Dundee Summer (Bash) Streets Festival, WestFest, and the 11th WUKF World Karate Championships.

11.93 The strategy highlights how important the city's external places and spaces are to delivering outdoor events and events of scale. These parklands, green spaces and sports fields provide opportunities for activities within communities, sparking social interaction and building a sense of place. The city centre is also identified as a key location due to its concentration of hospitality services, pubs, small-scale music venues and clubs, theatre spaces, and the large performance space within the Caird Hall. The key spaces are mapped below.



Figure 11.17: Dundee Event Spaces Map, Extraordinary Moments Shared: Events Strategy 2024-29

Tomorrow's Audience Report 2024 ([DED292](#))

11.94 A recent report on UK wide cultural venues has found that, as well as funding pressures, there are significant practical considerations that are discouraging audiences from attending events, including issues around transportation, travel distances, parking, toilets, and the difficulty of getting home after late performances. It is reasonable to assume that these practical issues are impacting upon other cultural and creative events and activities within towns and cities.



Figure 11.18: Practical Challenges to UK Music Venue Attendance, Tomorrow's Audience Report 2024.

Dundee's Creative Industries Strategy 2017 - 2021 ([DED106](#))

11.95 Dundee's Creative Industries Strategy was initiated and produced by [Creative Dundee](#) on behalf of the Dundee Partnership. It was co-designed with those working/studying in the city's creative industries sector and the local and national agencies who support the creative industries. The Strategy holds the collective vision and actions for harnessing culture to support the engagement, ambition, achievement, and wellbeing of Dundee's citizens, and has been collaboratively designed to support those in the diverse creative industries who underpin the city's vibrant cultural sector.

11.96 The process generated three key recommendations for the direction of the city's creative sector. The recommendations and a brief description of specific challenges/opportunities are set out below.

- 1. Making Creativity Sustainable:** Grow the opportunities and pathways for creative practitioners and businesses to base themselves in Dundee.

With a large creative student population in the city, a significant challenge for Dundee is encouraging its students from the local schools, universities and college to have the confidence to base their professional practice in Dundee upon completing their studies. Students feel the city lacks sustainable local opportunities of meaningful scale which were attractive enough to encourage them to stay and be rooted in Dundee beyond graduation. Students often want to stay but feel forced into leaving to find opportunities elsewhere.

- 2. Creating Big Collaborations in a Small City:** Build on the city's strengths and expertise to develop innovative new approaches to supporting the local economy and society.

Identifying sectors which could benefit from collaborations and partnerships with the creative sector will be valuable for exploring new and emerging practice. Within Dundee there are vibrant life sciences, healthcare, and creative technology sectors, a rapidly growing service sector, a growing tourism sector, and a large number of public, charitable and third sectors who could benefit from collaborative opportunities with the creative sector.

- 3. Developing Innovative Ways to Share Space and Resources:** Access space and resources to develop innovative ways to open and share.

Dundee's creative sector has limited access to available spaces to make, perform, show and sell work. There is a need for both temporary spaces (for making, performing, exhibiting and selling work) and mixed-purpose, alternative spaces (for experimentation and the development of new collaborations). Great progress has been made in bringing to life redundant spaces in the city, but there is a need for real effective partnerships with the public and private sector to continue this work.

Dundee Cultural Recovery: A Policy Report 2021 ([DED076](#))

11.97 Based on key findings from the 'Dundee Cultural Recovery Project' this research provides insights and understanding of the impact of the pandemic on the organisations and workforce who make up Dundee's cultural economy and the role of policy in supporting the city's cultural recovery. Both the cultural workforce and cultural economy were significantly impacted by the pandemic, which resulted in significant change and uncertainty around business models, funding streams, operating structures, staffing, skills, and finance. Space issues are a particular concern for the cultural sector, with some organisations raising concerns over their continued access to space, particularly in areas marked for (re)development in the city.

11.98 It is imperative that action is taken to address the precarity of creative employment and that the contribution of creative and cultural workers and organisations are recognised, valued and resourced

appropriately at local, regional and national levels. Rather than seeing cultural planning as a standalone practice, stakeholders highlighted the potential for strategic linkages between different policies and areas of the local plan – including hospitality, night-time economy and tourism as well as health and wellbeing and education agendas – in which the contribution of culture and cultural organisations could be recognised further.

11.99 The key recommendations for cultural organisations and policy makers in Dundee are to:

- **Adopt an ecological response to recovery** including all parts of the Dundee creative ecosystem (policy, organisations, workers, communities/audiences) and considering connections beyond sector and city boundaries, including with wider local plan priorities.
- **Support creative workers as crucial members of the cultural economy and its supply chain** by addressing existing issues around precarious work and talent retention and development in the city, including addressing gaps in career development pathways (work placements, internships and apprenticeships) and providing more equitable access to financial support for freelancers.
- **Capitalise on the city's potential to innovate through collective action** and implement care-orientated practices and policies to support the cultural economy and its workforce.
- **Establish consistent coordination and reporting systems** for the Cultural Development Group to sustain capacity for collective action.
- **Secure communication channels** between Cultural Development Group members and policy makers to ensure the voice of the sector is heard.

Dundee Creative Space Survey 2023 ([DED075](#))

11.100 To better advocate and negotiate for creative space, [Creative Dundee](#) and [Hapworks](#) carried out a survey aimed at creative practitioners, businesses and organisations based in Dundee to establish their needs. The survey received 106 responses between 31 October and 10 December 2023. Some of the key data and findings is highlighted below. For further detail on the feedback, please refer to the survey.

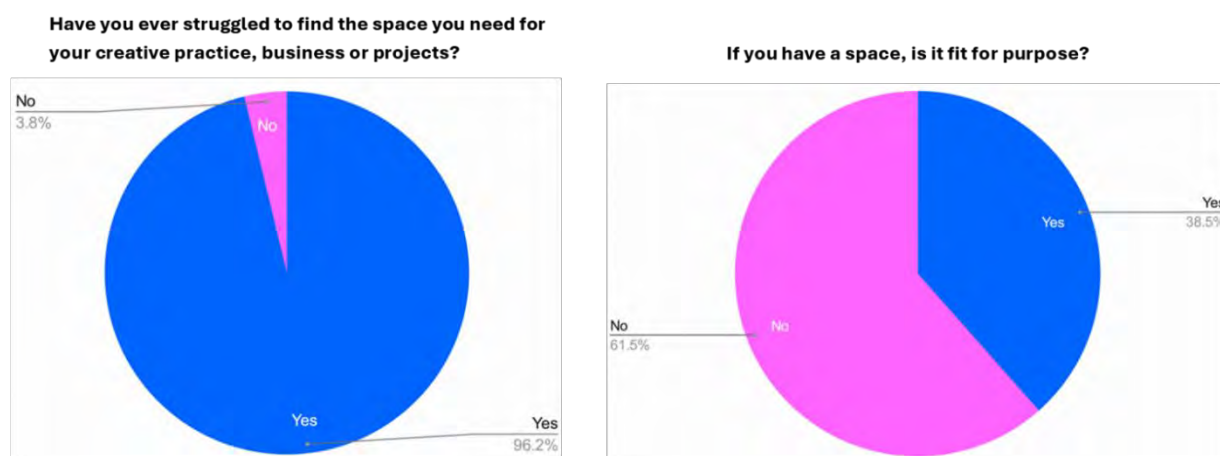


Figure 11.19: Access to Space and Effectiveness, Dundee Creative Space Survey 2023

Where do you currently do your creative work?
Respondents could choose more than one answer.

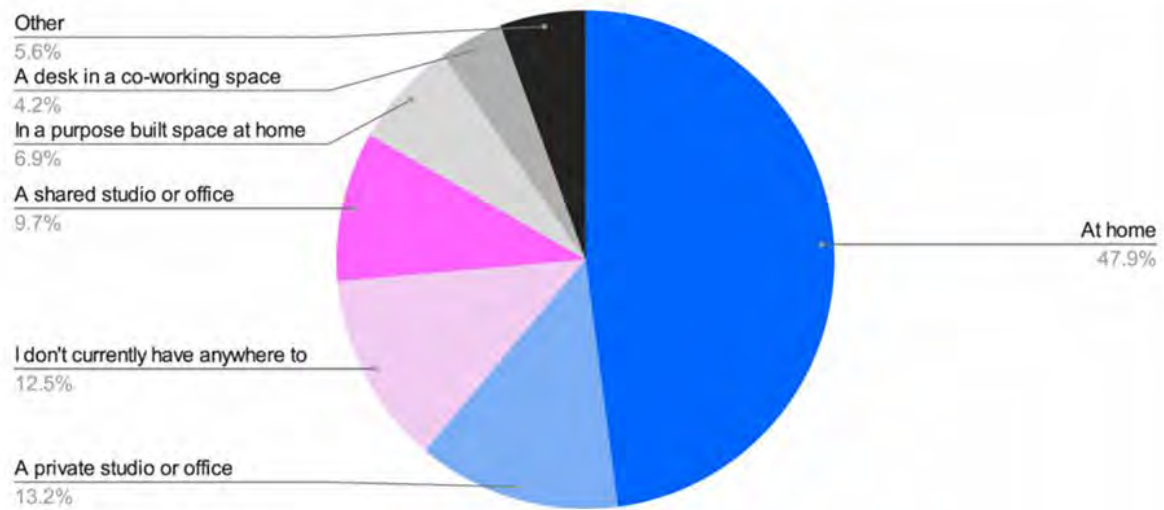


Figure 11.20: Existing Creative Space Locations, Dundee Creative Space Survey 2023

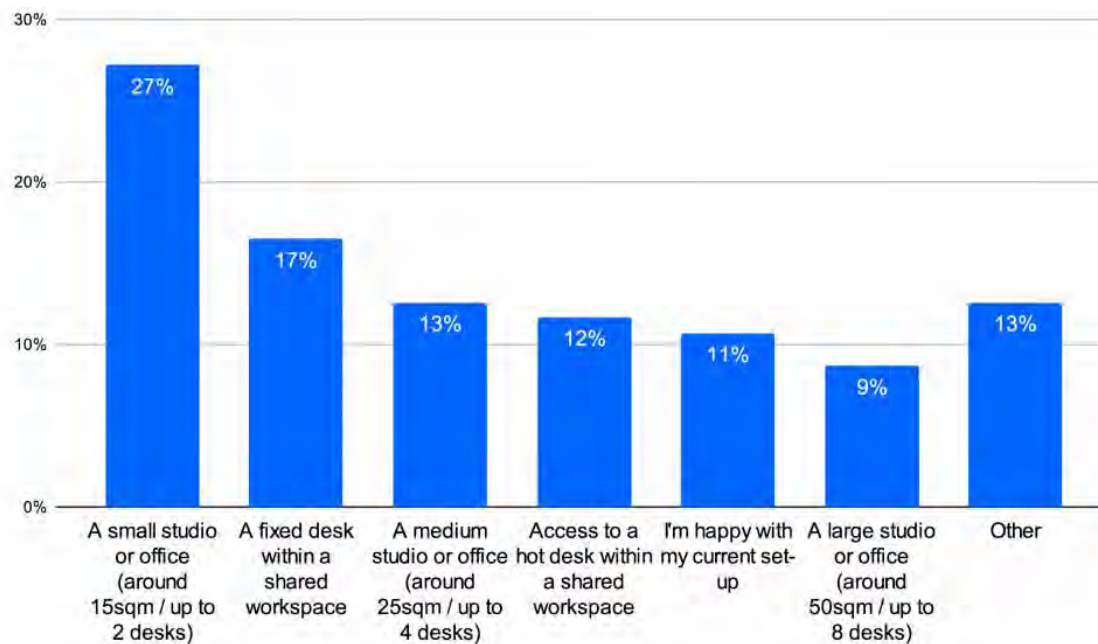


Figure 11.21: Primary Workspace Needs, Dundee Creative Space Survey 2023.

Note: Other spaces needed included a maker space with access to equipment (34), recording studio (14), space to hold workshops (2), photography studio and/or dark room (5), performance or rehearsal space (4).

What opportunities could this type of space enable for your practice or business?

Respondents could choose more than one answer.

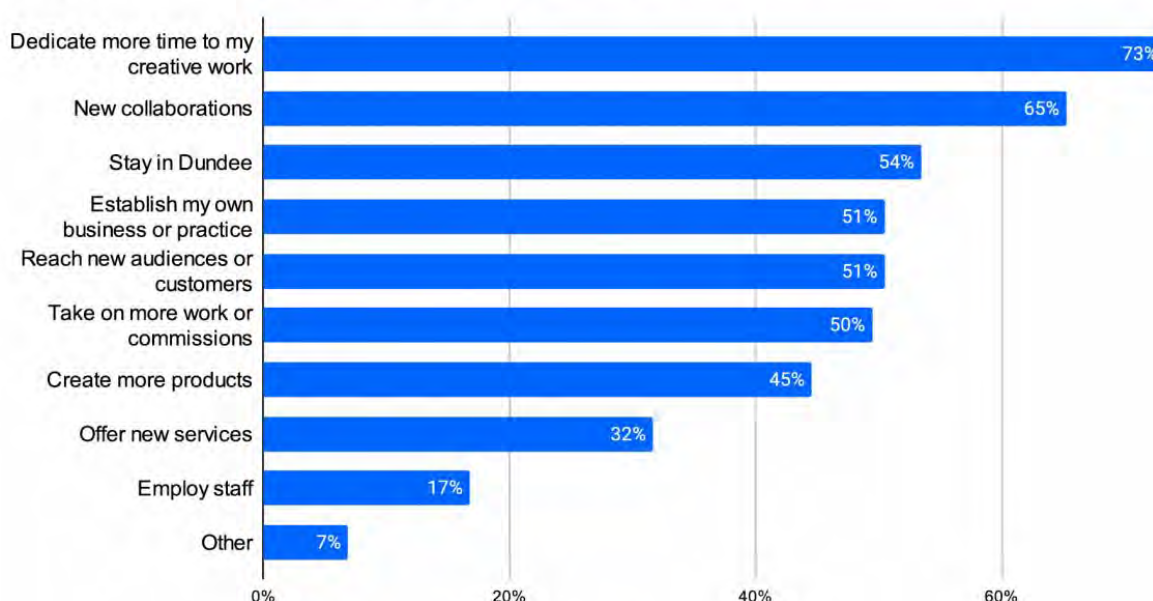


Figure 11.22: Space Access Potential, Dundee Creative Space Survey 2023.

Hapworks ([DED143](#))

11.101 Hapwoks is enabled by Creative Dundee and formed by creative practitioners, businesses and organisations based in the city who are working collaboratively to advocate and negotiate for better access to space for creativity. Their goal is to secure long-term space driven by the needs of the creative community, which facilitates collaboration, makes the sector visible and valued, and demonstrates its potential. This responds directly to the third recommendation set out above in Dundee's Creative Industries Strategy 2017 – 2021.

11.102 Working in partnership with Dundee City Council, Hapworks occupied and animating a vacant unit at 7 Castle Street in Dundee City Centre from February to May 2024 to June 2025. The project piloted an adaptable creative space, offering creative coworking alongside an events programme, while testing new ways of working and sharing the long-term ambition for permanent creative space. The key outcomes and impacts of the pilot are set out in the webpage [Hapworks 00](#). Following completion of the Hapworks pilot, 7 Castle Street is currently transformed by the award-winning artist Lindsey Mendick, commissioned by the arts organisation Jupiter Artland.

Spatial Mapping the City's Cultural Offering

11.103 Currently, there is no comprehensive, live, mapping of cultural spaces within Dundee. Organisations, such as Creative Dundee do provide information which promotes creative and cultural places and spaces: [99 Things to See and Do in Dundee and Spaces of Dundee](#).

11.104 As part of the overall evidence base being generated for the proposed plan, our planning team is currently producing a GIS Liveable Neighbourhoods Tool (see para. 7.29 to 7.35), based on the principles of [20-Minute Neighbourhoods](#). The intention is to make this a public asset with a broad range of mapped services and

amenities. Where spatial data is available, we will include the city’s cultural offering, including museums, galleries, theatres, cinemas, music venues, studios, recording and creative spaces.

Summary of Stakeholder Engagement

Pre Topic Paper Consultation

11.105 The initial stakeholder working group listed below was developed through internal and external individuals with responsibilities and interests in the city’s network of centres, tourism, retail, culture and creativity. As set out in the list below, the group consisted of internal Dundee City Council representatives and external organisations. These topic experts assisted in developing a robust evidence base for the topic paper.

Internal

- DCC Economic Development

External

- Leisure and Culture Dundee
- Creative Dundee

Topic Paper Consultation

11.106 The Town Centre First and Economy Topic Paper (DER011) was published for consultation between 24th April 2024 and 31st May 2024 and forms the basis for the ‘Summary of Evidence’. All stakeholders involved in the preparation of the topic paper were also formally consulted on the published topic paper.

Post Topic Paper Consultation

11.107 Formal responses to the topic paper consultation were assessed and appropriate changes have been incorporated into the Summary of Evidence. Where consultees disputed any of the submitted evidence, resolution email correspondence was conducted to justify our methodology/ position, or to confirm amendments/ additions in alignment with comments.

Engagement Summary Table

11.108 The following table identifies engagement with stakeholders, from the topic paper consultation period onwards, including summary comments and Dundee City Council’s responses. Comments are only provided where contributions from stakeholders led to amendments or additions to the evidence base. Where formal disputes could not be resolved through further engagement they are identified in the table and then further detail is provided within the ‘Statements of Agreement/ Dispute’ section.

Respondent	Summary of Comments & DCC Response
Creative Dundee (STA020)	In agreement with the evidence. DCC Response: Comments noted.
Leisure and Culture Dundee (STA009)	In agreement with the evidence. DCC Response: Comments noted.

Historic Environment Scotland – (STA004)	In agreement with the evidence. DCC Response: Comments noted.
DCC Economic Development – (STA028)	In agreement with the evidence. Evidence updated provided through notification of new tourism strategy and updated STEAM data for 2023. DCC Response: New documents and data incorporated into Schedule 3.
Homes for Scotland – (STA047)	Disagree with the evidence, but do not dispute the evidence. Homes for Scotland state that larger-scale housing developments, by way of the integration of mixed uses, may be able to create new 20-minute neighbourhoods which would be compliant with NPF4 aspirations. The 20-minute neighbourhood principle must be capable of being applied flexibly considering local context and with discretionary decision-making powers depending on wider social, economic and environmental benefits. Various comments were also submitted in relation to the Liveable Neighbourhoods Tool and the Local Housing Land Requirement. DCC Response: Regarding the stated potential of large-scale housing developments to create new 20-minute neighbourhoods, and views on the applicability of the principle, rather than evidence-based information, we view these comments as being more aligned with the future Call for Ideas and Proposed Plan stages. They are also more aligned with NPF4's Policy 15 Local Living and 20-minute neighbourhoods, which is covered in the Infrastructure First and Local Living schedule. Considering 20-minute neighbourhoods (liveable neighbourhoods) within the context of this schedule, specifically 'Policy 27 City, town, local and commercial centres', it is primarily focused on the future prosperity of existing urban centres, rather than new-build housing developments. We note that comments were also submitted regarding the Liveable Neighbourhoods Tool and the Local Housing Land Requirement to the relevant topic papers, namely 'Infrastructure First and Local Living' and 'Quality Homes and Site Assessment Methodology', and these comments are addressed in correspondence relating to those evidence report schedules. No change to evidence and email confirmation sent.
Private Individual – (STA037)	In agreement with the evidence. DCC Response: Comments noted.

Private Individual – (STA011)	In agreement with the evidence. DCC Response: Comments noted.
Private Individual – (STA035)	In agreement with the evidence. DCC Response: Comments noted.
Dundee Civic Trust – (STA017)	Dispute the evidence. Please see the ‘Statements of Agreement/Dispute’ section below for further information.

Summary of Implications for the Proposed Plan

Policy 27 City, Town, Local and Commercial Centres

- 11.109 The Town Centre First approach is a significant feature of Dundee’s current LDP2019 and is strengthened further through NPF4. The proposed plan, spatial strategy and master planning will be led by a Town Centre First approach.
- 11.110 As it progresses, our Liveable Neighbourhoods Tool will help shape the plan preparation, spatial strategy and master planning by providing a better understanding of community needs and informing where sustainable development should be directed. The data will also assist with the assessment of the city’s network of centres.
- 11.111 If the vacant property GIS dashboard can be further developed, the Council may be able to monitor and better understand city-wide commercial vacancies. This would allow the identification of specific problem areas or trends that could inform the proposed plan. Nonetheless, initial analysis of data outputs from the dashboard are showing that multiple vacant properties are unregistered by owners, which is having an impact on the completeness and reliability of the data.
- 11.112 The vision, strategic outcomes and actions established within the Dundee City Centre Strategic Investment Plan 2050 (CCSIP) ([DED067](#)) fully align with the intentions of NPF4’s Policy 27 City, town, local and commercial Centres. The CCSIP is a material consideration in the determination of planning applications, and it will be formally integrated into the proposed plan. Following Committee approval in January 2024, a more detailed masterplan is being developed for the Eastern Quarter of the city centre. This will provide a more in-depth analysis of future development and improvement opportunities, which will be considered for integration into the proposed plan.
- 11.113 From the Savills recommendations in their report on Increasing Residential Capacity in the city centre ([DED318](#)), we have already commissioned a more detailed masterplan of the Eastern Quarter of the city centre. To some extent infrastructure requirements and priorities have already been identified through the CCSIP, and any further requirements will be considered through development of the Eastern Quarter masterplan and the Infrastructure First and Local Living schedule. City wide housing figures will be considered in the Quality Homes schedule and the Local Housing Land Requirement calculation. Thereafter, the Call for Ideas/Sites and Proposed Plan stages will help to determine the proportion of local housing land requirements within the city centre.
- 11.114 The implications of the evidence from the Review of Retailing in Dundee 2023 ([DED247](#)) mean that it is unlikely that the proposed plan will allocate any new sites for drive-thru restaurants. The potential clustering of hot food takeaways and betting shops will need to be investigated further to determine if action is to be taken within the proposed plan.

NPF4 Policy 28 Retail

- 11.115 It is likely that the allocation of any new, significant, convenience floorspace will be limited across the Dundee area. The focus is likely to be on the upgrading and refurbishment of convenience floorspace in the City Centre and District Centres, together with support for some additional new neighbourhood shops in 20-minute catchment areas where need is identified.
- 11.116 It is likely that the allocation of new comparison floorspace will be limited across the Dundee area. The focus is likely to be associated primarily with mixed-use re-development areas in the city centre.
- 11.117 There is likely to be no need to identify any additional edge of city centre, district centre, or commercial centre sites for new retail development. The Gallagher Retail Park extension identified in the current LDP 2019 (Policy 25 Gallagher Retail Park Extension) is likely to be omitted from the proposed plan as this land has the potential to contribute to alternative city centre needs. The proposed plan is likely to prioritise support for new retail development opportunities within the city centre area through the redevelopment of existing properties and development of key sites.
- 11.118 If the current LDP 2019 'Policy 22 City Centre Retail Frontages', and 'Policy 23 District Centre Retail Frontages' are to be carried forward into the proposed plan, they will need to be amended in line with recent amendments to the Use Class Order, and the General Permitted Development Order.
- 11.119 The current LDP 2019 'Policy 24: Goods Range and Unit Size Restrictions' which places restrictions on the range of goods and unit sizes in commercial centres and food stores is likely to be carried forward into the proposed plan.

NPF4 Policy 30 Tourism

- 11.120 Dundee's spatial strategy will support opportunities for tourism development by taking full account of the various regional and local tourism strategies, and by strengthening its adherence to the Town Centre First principle. Support will be provided for the broadest variety of visitor and tourism attractions to grow the tourism sector and to strengthen the quality and attractiveness of the city. Support for the necessary digital, transportation, accommodation and venue infrastructure will also be provided.
- 11.121 Dundee's current LDP 2019 Policy 8: Visitor Accommodation will be reviewed in light of policy 30's short-term let requirements to ensure that the assets and amenities of the city, communities and individuals are safeguarded.

NPF4 Policy 31 Culture and Creativity

- 11.122 The strong role that culture, creativity and local people play in delivering lasting improvements for people and communities should be reflected in the proposed plan development. Policy and spatial strategy considerations around the important value of spaces, places and assets (internal and external) should support the city's broad range of cultural, creative, event and community-orientated needs. Adopting an ecosystems approach is required to understand the extent to which culture and creativity can contribute to different policies and areas, including hospitality, night-time economy, tourism, health and wellbeing and education.
- 11.123 Dundee's broad range of cultural and creative events, venues, businesses, start-ups and individuals contribute a significant amount to local employment and the economy. Dundee's creative industries are a

top contributor in the key growth sectors. The importance of this will be taken into account within the policy and spatial strategy of the proposed plan.

11.124 The recommendations and evidence from Dundee's Creative Industries Strategy 2017 – 2021 ([DED106](#)) have a direct correlation with the City Council's vision for future growth and development of the city, particularly reflected in the key themes of the recent Dundee City Centre Strategic Investment Plan 2050 (CCSIP) ([DED067](#)), which will be integrated into the proposed plan. The proposed plan should further support and grow local and emerging sectors, industries, businesses, tourism, and digital connectivity infrastructure; creating further opportunities for creative sector collaboration. Additionally, the proposed plan should support the CCSIP's vision to create a more vibrant, attractive, dense, accessible and efficient city centre, which will support graduate retention, city centre living, visitors, tourists, the evening economy, and in turn provide support for a broad range of startups, creatives, businesses, venues, and events.

11.125 Access to space is a significant concern for the cultural and creative sectors. The value of existing venues and assets, and the potential for growth and development associated with access to the right spaces must be considered in the development of the proposed plan.

Statements of Agreement / Dispute

Statements of Agreement

11.126 As outlined within the Summary of Stakeholder Engagement, a significant level of engagement was carried out with multiple stakeholders during pre-consultation, consultation, and post-consultation of the topic paper. The following organisations agree with the evidence base presented:

- DCC Planning and Economic Development (STA028)
- Leisure and Culture Dundee (STA009)
- Creative Dundee (STA020)
- Historic Environment Scotland (STA004)

Statements of Dispute

11.127 Throughout the course of the consultation on the Town Centre First and Economy topic paper one formal dispute was submitted by the Dundee Civic Trust. The Council have carefully considered all issues raised and submitted comments back to the Dundee Civic Trust to clarify the position. Notwithstanding the Council's response, Dundee Civic Trust have decided to progress their dispute to Gate Check. The nature of their dispute and our final position is set out below.

Dundee Civic Trust

Dispute

11.128 The current data set on empty commercial properties in the city centre does not capture the 'fine grain' data associated with empty accommodation above occupied ground floor commercial premises, which is being kept empty intentionally by the owner. This data can be obtained through a simple drone survey, or through observations from street level, to quickly ascertain which properties are empty or not.

DCC Response

- 11.129 Whilst it is recognised that ‘fine grain’ data on unused upper floors would be useful in understanding the true amount of empty space in our city centre, a regular and reliable system for recording such data does not exist. If floors above functioning businesses, within the same address, are kept empty then there is no formal record of vacancy. Even wholly vacant properties are often not declared by owners, which has an impact on the data we can gather on vacant properties through non-domestic rates. Like any data based system, the quality of the data is key to the quality of the output, and unfortunately many landlords for various reasons do not register vacant properties or continue to operate property in a partially occupied state. Carrying out regular manual surveys to ascertain a ‘fine grain’ dataset is impracticable as the process is time/labour prohibitive, and it does not guarantee a definitive outcome, particularly regarding empty/vacant upper floors which are more difficult to access/view. It also relies upon the cooperation of landlords to understand the nature of properties where occupation is uncertain.
- 11.130 The suggestion of upper floor inspections of occupation by drone survey and or street level observations would not constitute robust evidence to substantiate policy formation. There are also considerable privacy and licencing requirements associated with flying a drone through city centre streets and viewing the above ground level windows of buildings.
- 11.131 As a result of the above issues, it is unfeasible for the City Council to obtain the ‘fine grain’ detail associated with empty properties as part of the evidence report. Ultimately, the City Council are keen to see empty upper floors, and all other forms of vacant properties and sites, brought back into productive use. As outlined in the topic paper, we are piloting the use of non-domestic rates data to try and better understand vacancies across the whole city, and work continues with agents, investors, and landowners to implement the redevelopment ambitions of the Dundee City Centre Strategic Investment Plan 2050 ([DED067](#)). In addition, as part of the proposed plan preparation, consideration will be given to a supportive policy framework to help repurpose upper floor vacant spaces, and comments on this will be welcome at the Call for Ideas stage.

Appendix 1.

Dundee Local Development Plan 2019 - Evaluation of Outcomes and Performance

Contents

1. Background
2. Cross Cutting Themes in Dundee Local Development Plan 2019
3. Appropriateness of the Dundee Local Development Plan 2019 Spatial Strategy
4. Main issues in the Dundee Local Development Plan 2019
5. Lessons learnt in the preparation of the new plan

1. Background

Dundee City Council's first Local Development Plan was adopted on the 15 February 2019. This Local Development and previous Local Plans have been successful in delivering much needed new private and affordable homes, new infrastructure, investment, new Primary schools, leisure opportunities, improvements to Dundee's natural environment and high quality development. We will seek to continue this momentum through the new Local Development Plan.

Paragraph 93 of the Local development planning guidance (May 2023) sets out that:

'As part of the preparation of the Evidence Report, the planning authority should evaluate whether the previous plan has delivered on its outcomes, and allocations, identify any lessons learnt for the preparation of the new plan and consider the appropriateness of the previous spatial strategy. However, new proposals or site specific detail should not be included at this stage.'

In accordance with this, Dundee City Council have set out below:

- Reviewed themes set out within the DCC LDP 2019 and assessed how these have been delivered;
- Reviewed the housing and business land allocations set out within the DCC LDP 2019 and assessed the completions/build status of these;
- Reviewed the appropriateness of the DCC LDP 2019 spatial strategy; and,
- Identified lessons learnt in the preparation of the new plan;

2. Cross Cutting Themes in Dundee Local Development Plan 2019

Several cross cutting themes were identified within the Local Development Plan 2019, influencing and underpinning the choices and direction of the policies, proposals and development sites. They have also been woven through the Environmental Report, Habitats Regulations Appraisal Record and various background papers that accompany the plan.

These themes have been set out below, including an analysis of how these have been met in the delivery of the Approved Plan. The themes cut across Climate Change, Creating Better Places and Developing Infrastructure.

Local Development Plan 2019 Themes - Shaping the Future of our Places	
Theme objectives	Commentary
Build climate change resilience into the natural and built environment.	The review of the natural and built environment policies has concluded that the policy frameworks was generally considered to be effective in building in climate change resilience. No sites with designations have been compromised by any recent proposals. The LDP will continue to play an important role in protecting and enhancing built and natural landscape character and climate change resilience. The LDP has a pivotal role to play in tackling climate change and associated risks. This will require to be developed in DCC LDP Review in light of the requirements of NPF4 and policy and guidance reviewed within the relevant Evidence Report Topic Papers.
Ensure high resource efficiency and low/zero carbon energy generation technologies are incorporated within development.	This has been required in planning decisions through applying the DCC LDP 2019 policies. This will be required to continue and develop further as work progresses on DCC LDP Review.
Safeguard promote and expand green networks and habitats.	Achieved through application of the plan's policies, and close working with a number of other departments within the Council. This will be required to continue and develop further as work progresses on DCC LDP Review.
Integrate new development into existing community infrastructure.	This has been required in planning decisions through applying the plan's policies.
Promote high quality, innovative and sustainable design and construction in new development.	This has been required in planning decisions through applying the DCC LDP 2019 policies. This will be required to continue and develop further as work progresses on DCC LDP Review.
Avoid, mitigate or adapt to the causes of climate change.	The Climate Emergency declared by Dundee City Council in June 2019 and the Council's Dundee Climate Action Plan to respond to this challenge requires the Council to take urgent action to address the risks of climate change to meet key targets for reduction in carbon emissions. DCC LDP 2019 has addressed this utilising the information, data and guidance available at that time. However, DCC LDP Review will have a pivotal role in taking this further.
Promote high quality new development through a design process that incorporates the six qualities of place.	This has been required in planning decisions through applying the DCC LDP 2019 policies. This will be required to continue and develop further as work progresses on DCC LDP Review.
Protect and enhance the natural environment along with species of international, national and local importance.	The policy framework was generally considered to be effective in achieving the objectives of the Plan and protecting and enhancing the natural environment. This will be required to continue and develop further as work progresses on DCC LDP Review.
Protect important cultural, historic and landscape features.	This has been required in planning decisions through applying the DCC LDP 2019 policies. This will be required to continue and develop further as work progresses on DCC LDP Review.
Match infrastructure to	Through a review of DCC LDP 2019 policies, proposals

Local Development Plan 2019 Themes - Shaping the Future of our Places	
Theme objectives	Commentary
sustainable development and economic growth needs.	and planning decisions it can be concluded that development during the Plan period has, where possible, been concentrated in the urban areas and brownfield sites. This has allowed for reducing the need to travel, encouraging energy efficiency, use of sustainable/public transport options and existing infrastructure and services. However, some development has also been directed towards outlying areas of Dundee, particularly housing development. The balance of sustainable development and economic growth requirements will continue through considerations of DCC LDP Review. DCC LDP Review will also have an important role in enabling the infrastructure required for new development, ensuring that this is done sustainably.
Consider creative funding options with developers to deliver sustainable development.	The principle of Sustainable Development is central to DCC LDP 2019 and following assessment is considered to have successfully integrated this theme objective. Further information on developer contributions can be viewed in the Infrastructure First and Local Living Topic Paper. Developer obligations should be considered through DCC LDP Review and where appropriate creative funding through mechanisms such as Community Wealth Building. The council's existing Developer Contribution Supplementary Guidance will be reviewed and integrated where appropriate.
Encourage coordination between key agencies and other stakeholders in making best use of limited resources.	This was successfully undertaken in the preparation of DCC LDP 2019. DCC continue to work closely with Key Agencies and other Stakeholders and it is proposed that this will continue through DCC LDP Review through maintaining a Key Stakeholder Group.

An analysis of Planning Application decisions since the DCC LDP was adopted on the 15 February 2019 (10,746 decisions) until 31st December 2024 reveals that the twelve LDP policies most used in decision making include:

- Policy 11 – Householder Development (1,548 decisions)
- Policy 51 – Development in Conservation Areas (1,426 decisions)
- Policy 1 – High Quality Design/ Placemaking (1,209 decisions)
- Policy 49 – Listed Buildings (1,165 decisions)
- Policy 39 – Environmental Protection (644 decisions)
- Policy 54 – Safe Sustainable Travel (438 decisions)
- Policy 10 – Design of New Housing (329 decisions)
- Policy 41 – Land Contamination (302 decisions)
- Policy 37 – Sustainable Drainage Systems (288 decisions)
- Policy 48 – Low Zero Carbon Technology (247 decisions)
- Policy 21 – Town Centre First Principle (174 decisions)

- Policy 35 – Trees and Urban Woodland (157 decisions)

Below also outlines the twelve LDP policies used least in Planning Application decisions during the same time period:

- Policy 43 – Waste Management Installation (1 decision)
- Policy 57 – Transportation Interchanges (1 decision)
- Policy 47 – Wind Turbines (2 decisions)
- Policy 32 – National and International Nature Conservation Designations (2 decisions)
- Policy 53 – Gardens and Designed Landscapes (4 decisions)
- Policy 55 – Dundee Airport (4 decisions)
- Policy 38 – Protecting Improving the Water Environment (6 decisions)
- Policy 29 – Outdoor Access the Dundee Green Network (8 decisions)
- Policy 15 – Student Accommodation (8 decisions)
- Policy 19 – Private Day Nurseries (9 decisions)
- Policy 26 – Local Shopping Provision (9 decisions)
- Policy 45 – Energy Generating Facilities (9 decisions)

Some of the data on policy usage above could be anticipated. However, this is helpful data to allow an analysis of policies that may not be required or could be merged, simplified or enhance for the Local Development Plan review.

Appendix 1 references a review of DCC LDP Policies and Actions.

3. Appropriateness of the Dundee Local Development Plan 2019 Spatial strategy

The DCC LDP 2019 Spatial Strategy set out 6 criteria:

1. A City recognised for Leisure, Culture and Design
2. Sustainable Economic Growth
3. Quality Housing and Sustainable Communities
4. Town Centres and Retailing
5. Sustainable Natural and Built Environment
6. Sustainable and Accessible Transport

The Spatial Strategy set out within the DCC LDP 2019 was considered to be appropriate at the time of publishing, and inline with the National Planning Framework 3.

- The Spatial Strategy recognised the important role of Dundee Port and Dundee Waterfront as national development within the National Planning Framework 3.
- The strategy and policies of the Local Development Plan promoted sustainable economic growth and the development of a low carbon city with sustainable connections.
- The Spatial Strategy reflected the vision and strategy of TAYplan Strategic Development Plan.
- The Spatial Strategy and policies recognised the importance of green space throughout the City, the historic environment and the contribution that leisure and culture make to creating places which can be explored and enjoyed by residents and visitors alike.
- It emphasises the importance of high quality design in the creation of sustainable communities and promotes the opportunity to be innovative, creative and lead by example as a UNESCO City of Design.

4. Main issues in the Dundee Local Development Plan 2019

A summary of how Dundee City Council is addressing the six main issues identified within the Local Development Plan 2019 is set out below. Where relevant a review of the spatial strategy, policies and designations of the LDP2019 has been set out below also. The DCC Action Programme 2019, the DCC Action Programme 2022 (Local Development Plan Action Programme) and the DCC Delivery Programme 2025 should also be cross-referenced as outline how monitoring has been undertaken for specific themes and proposals.

1. A City recognised for Leisure, Culture and Design

Dundee's growing position as a City recognised for design, leisure and cultural activity will be promoted. We will seek opportunities to promote high quality, innovative and sustainable design solutions. We will seek to deliver an increased number and range of leisure related facilities by directing growth to the highly accessible central area.

Dundee has and continues to be a location recognised for high quality design, leisure and cultural activity. Since the adoption of DCC LDP 2019 Dundee has strived to ensure that new development safeguards and enhances environmental quality, creating quality places and mitigating potential negative impacts. This can be exemplified through the adoption of supplementary guidance in support of policy.

2. Sustainable Economic Growth

A focus on providing a land use context that facilitates the delivery of jobs to support Dundee's population and wider economy. Increased employment land will be available through Strategic Development and Enterprise Areas with existing land protected from inappropriate development. Policies will encourage existing and new businesses to invest with confidence in the City. Dundee will be increasingly recognised for tourism and cultural activity focused on the City Centre, Waterfront and Broughty Ferry.

The Dundee Business Land Audit (BLA) is an annual audit to monitor supply, take up and status of business land within the Dundee City Council (DCC) area. The audit assesses the range and choice of marketable sites and locations for businesses with a variety of size and quality requirements, as well as identifying the availability and constraints of employment land sites within DCC boundary.

The audit is prepared from sites designated for employment uses in the LDP 2019. These sites have been through the formal plan adoption process and therefore have been identified as effective. Below outlines a summary table of the available business land in Dundee since and immediately prior to the adoption of the LDP 2019.

	2018	2019	2020 & 2021	2022	2023	2024
Total Supply of available land	163.29	163.54	No data	160.74	159.81	143.04
Available land that is immediately available and therefore marketable (IA)	127.43	127.20	No data	125.22	122.86	109.15
Available land that has minor constraints but still considered marketable (MIN)	11.63	12.10	No data	11.3	No data	10.93

Available land that has major constraints and not considered marketable at this time (MAJ)	24.24	24.24	No data	24.24	No data	22.96
Total employment land that is marketable (IA + MIN)	139.06	139.30	No data	136.5	134.96	120.08
Total employment land that has constraints (MIN +MAJ)	35.81	36.34	No data	35.54	No data	33.89

Figure 1. Available Business Land Summary

Previous years audits primarily made use of information from planning applications and building warrant approvals. There was some variation in the quality of data obtained during the Covid pandemic making year-on-year comparisons difficult. In addition, no audits were published during the Covid-19 pandemic period. The 2022 audit sought to address that shortfall of information but retained the desktop-only nature of the audit process. A full audit was not undertaken in 2023 with data taken from building warrant completion certificates only.

The 2024 audit now seeks to make an assessment of sites as of 1st April 2024 and includes physical surveys of sites taken at that time. The survey included a reassessment of a site's capacity to be developed, and this has resulted in some minor boundary alterations (involving both expansion and reductions in site areas). Each site must be a parcel of land at least 0.1 hectares in size to be included in the audit and be completely vacant at the time of survey. Some sites did have minor evidence of activity such as parked HGV's or trailers but if a site had no signage, fencing or other indicators suggesting that this was a permanent active use then these would still be considered to be vacant and available for development.

3. Quality Housing and Sustainable Communities

The quality of housing in Dundee will be improved with access to a range of housing options. Choice will be encouraged through design that ensures that new development is appropriate to the character of the area in which it is built. This will be done in a sustainable manner and will promote the principles of lifetime communities. Brownfield development will be a priority.

Planning decisions and completions have largely been inline with spatial strategy and ambitions of DCC LDP 2019. The annual HLA monitors the delivery of housing land and will inform the LDP Delivery Programme in order to proactively support the delivery of housing provision within the City.

The chart below separates the completions stated above into brownfield and greenfield land completions, evidencing a rise in the uptake of brownfield land in housing development across the city.

Over the financial year 2022/23 76% of all completions were on brownfield land and 24% were greenfield completions.

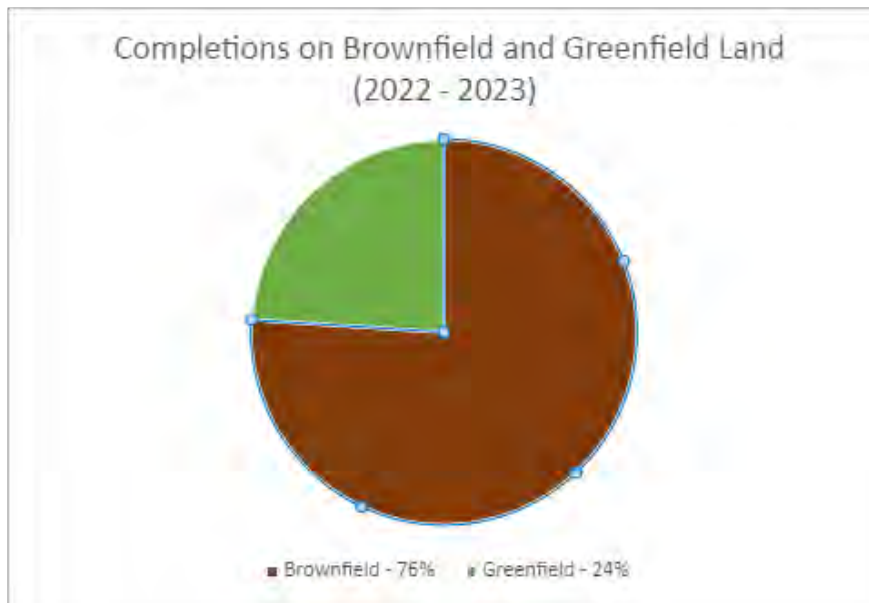


Figure 2. Completions on Brownfield and Greenfield Land (2022 – 2023)

Over the financial year 2023/24 89% of all completions were on brownfield land and 11% were greenfield completions.

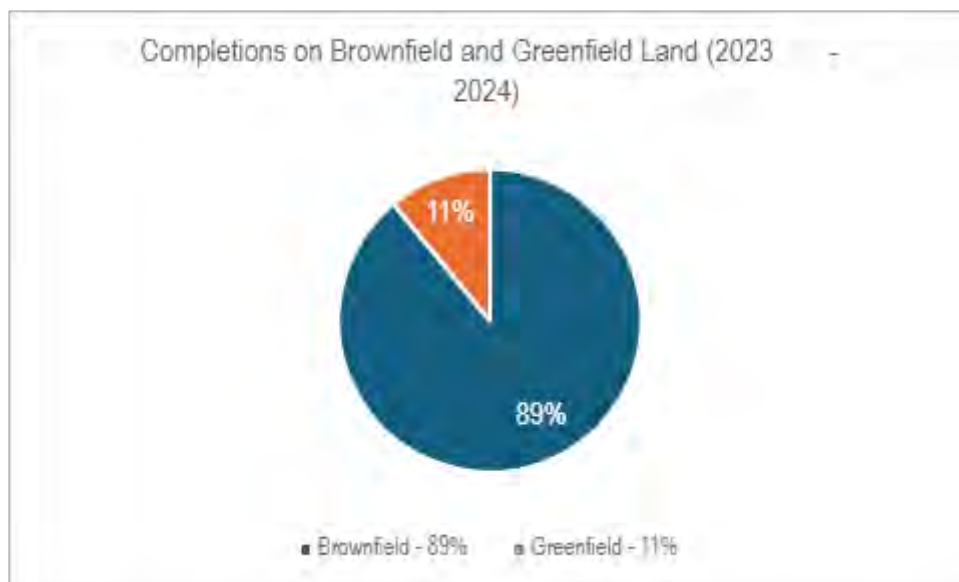


Figure 3. Completions on Brownfield and Greenfield Land (2023 – 2024)

4. Town Centres and Retailing

Dundee will have a vibrant and thriving City Centre, ensuring its position as a regional shopping destination is maintained. High quality shops will be encouraged in accessible locations to support the vitality and viability of the existing network of retail locations throughout the City. We will put our City Centre and District Centres first to protect and promote them as places to work, shop and visit.

Support continues for the city's town centres by ensuring new footfall generating uses locate in the city centre and district centres. The city's town centres are supported by controlling

the range of goods and units sizes within the Commercial Centres and major foodstores. Where possible the development of local shops and services is promoted and balancing this with the protection of local amenity.

5. Sustainable Natural and Built Environment

The quality of Dundee's environment is a vital ingredient in the quality of life for people living and working in the City. The impact of climate change challenges our duty to protect and enhance the environment for this and succeeding generations. The Local Development Plan encourages a lower carbon, sustainable City where development avoids, mitigates or adapts to the effects of climate change while protecting and enhancing the City's environmental assets.

Pre-application discussions are encouraged where-ever possible and appropriate studies are required to support planning applications, ensuring sustainable natural and built environment remains a top priority.

The Council continues to support the establishment and enhancement of green networks, woodland, tree belts and corridors and protect healthy mature trees and ensure sensitive land uses are protected from inappropriate development.

Although the current Local Development Plan provides a robust framework in developing place-based solutions to a zero-carbon future and contains strong policy references on climate change adaptation and mitigation, this will be developed further through the DCC LDP Review.

Ensuring development is not at risk from flooding or exacerbating flooding elsewhere and that new development is managed correctly and protects and where possible improves the water environment remains a critical issue arising from the current LDP.

The requirement for a Local Heat and Energy Efficiency Strategy was introduced by the Scottish Government to drive forward heat decarbonisation and better energy efficiency in buildings.

[Dundee's Local Heat and Energy Efficiency Strategy \(LHEES\)](#) is an important strategic plan for the city. It highlights key steps for reducing heating related carbon emissions, enhancing building energy efficiency, and addressing fuel poverty. It will help to tackle the city's climate emergency and meet its net zero target whilst also improving the thermal comfort and health and wellbeing of residents and offering the potential for new economic opportunities in the city.

The Delivery Plan is to be published separately and will detail how the Council plans to implement the key actions in the Strategy.

LHEES has two core functions and six scopes, referred to as considerations in the guidance.

6. Sustainable and Accessible Transport

Dundee will be better connected to its region, the rest of Scotland and beyond. It will be a City that encourages sustainable movements through careful consideration of land use, planning and the promotion of active and sustainable travel.

As set out in the DCC Action Programme 2022 this main issue of Sustainable and Accessible Transport is undertaken through the below:

- Ensure new development safely integrates with transport networks and encourages active travel.
- Support expansion and safe operation of Dundee Airport.
- Ensure compliance with Dundee City Council's road standards.
- Encourage and support the development of transport interchanges.
- Encourage and support the development of digital infrastructure including communication masts.

This has been achieved through:

- Undertaking studies, where required, to support planning applications.
- Provide planning advice to support the growth of the airport.
- Ensure road standards are up to date and maintain a close working relationship with the DCC roads department.
- Provide planning advice to Tactran to support plans for new and enhanced transport interchanges.
- Supporting the delivery of broadband through the Scottish Government's Infrastructure Action Plan. Encourage pre-application discussions to minimise environmental impact.

Much of the above achievements are ongoing and will continue through the development of DCC LDP Review.

5. Lessons learnt to inform the preparation of the LDP Review

Below provides a summary of lessons learnt in progressing the LDP Review. A continued appraisal of DCC LDP 2019 spatial strategy and policy framework will continue throughout the process in the preparation of the LDP.

- The need to undertake an analysis of NPF4 and DCC LDP 2019 compatibility to inform thinking about which policies will be required for DCC LDP Review.
- Understanding NPF4 policy requiring and developing a spatial strategy and vision that successfully adheres to these but also that meet development requirements within Dundee.
- Ensure that the Dundee Climate Emergency is a central theme in DCC LDP Review. This was announced following the adoption of DCC LDP 2019 therefore the focus on this could be stronger.
- Maintain a close working relationship with housing developers to ensure all effective housing sites are up to date and continue to build out the predicted numbers to meet housing targets.
- Consider acceptable uses through employment allocations and how these could be refined further from DCC LDP 2019.
- Consider how and what policy framework might help increase the mix of housing size, type, tenure and accessibility/flexibility delivered through DCC LDP 2019 and how this will inform the LDP Review.
- Consider how affordable housing can be delivered through DCC LDP Review.
- Consider tourism demands in Dundee and how this plays out in terms of tourist accommodation requirements.
- These lessons will also inform the Delivery Programme to be published as part of the LDP Review, ensuring realistic phasing of delivery and stronger alignment with infrastructure investment.

6. Appendix 1 – Delivery Programme review of DCC LDP Policies and Actions

Policy/ Proposal	Title	Description & Purpose	Action	Responsible Parties	Timescales
City of Design					
Policy 1	City of Design - Promoting High Quality Design and Placemaking	Ensure that new development safeguards and enhances environmental quality, creating quality places and mitigating potential negative impacts	Adopt supplementary guidance in support of policy: Householder Development Advice and Best Practice	Dundee City Council (City Development)	Supplementary guidance adopted in parallel to LDP 2019
Policy 2	Public Art Contribution	All developments in Dundee with construction costs of £1 million or over will be required to allocate at least 1% of construction costs for the inclusion of art projects in a publicly accessible/visible place or places within the development.	Controlled via DM officers, support and engage with developers to deliver public art	Dundee City Council (City Development)	Ongoing as proposals emerge
Sustainable Economic Growth					
Policies 3, 4 & 5	Economic Development Areas	Ensure there is a minimum 5-year supply of effective land for business uses for inward investment and growth of established companies	Undertake annual BLA. Liaise with City Development Property Team regarding City Council owned employment land.	Dundee City Council (City Development)	Business Land Audit, undertaken annually.
Policy 6	Ancillary Services within Economic Development Areas	Enable establishment of ancillary services that support economic development areas	Undertake annual BLA. Liaise with City Development Property Team regarding City Council owned employment land.	Dundee City Council (City Development)	Business Land Audit, undertaken annually.
Proposal 1	Blackness Regeneration	Requires the preparation of a design framework that will support the re-use of vacant land and buildings and other physical improvements within Blackness	Prepare design framework	Dundee City Council (City Development)	Blackness Business Place Plan published 2019
Policy 7	Tourism and Leisure Development	Support inward investment and the growth of existing tourism and leisure uses in the right location	Encourage pre-application discussion for tourism and leisure development	Dundee City Council (City Development)	Ongoing as proposals emerge
Policy 8	Visitor Accommodation	Support inward investment and the growth of existing visitor accommodation uses in the right location	Support the delivery of the Dundee Waterfront Masterplan	Dundee City Council (City Development)	Ongoing as proposals emerge
Quality Housing & Sustainable Communities					

Policy 9	Housing Land Release	Ensure there is a minimum 5-year supply of effective land for housing development	Housing land will be monitored through the Delivery Programme and the annual Housing Land Audit	Dundee City Council (City Development)	Undertake annual HLA
Policies 10, 11, 12 & 13	Design of New Housing	Ensure that new development safeguards and enhances environmental quality, creating quality places and mitigating potential negative impacts Supplementary Guidance on 'Householder Development - Advice and Best Practice' will promote high-quality design in householder development. This specific householder guidance takes into consideration the six qualities of successful place.	Adopt the supplementary guidance. Promote the use of the supplementary guidance. Encourage pre-application discussions for all scales of development	Dundee City Council (City Development)	Adopted the supplementary guidance in parallel to LDP 2019. Ongoing promotion of supplementary guidance. Regular engagement with Neighbourhood Services and Housing Associations
Policies 14, 15 & 16	Different types of residential accommodation	Support the development of different types of residential accommodation to meet different housing needs.	Liaise with Neighbourhood Services to understand the need and demand for non-mainstream housing. Support the preparation and delivery of the Local Housing Strategy and Strategic Housing Investment Plan.	Dundee City Council (City Development and Neighbourhood Services)	Ongoing as proposals emerge
Policies 17, 18 & 19	Commercial Uses, Community Facilities & Private Day Nurseries	Support the development of facilities to support our housing areas	Encourage pre-application discussions for all scales of development	Dundee City Council (City Development)	Ongoing as proposals emerge
Policy 20	Funding of On and Off Site Infrastructure Provision	Meet deficiencies in infrastructure arising from new development Supplementary guidance on Developer Contributions will ensure that landowners, developers and DCC have certainty about the likely level of developer contributions and the nature of requirements for sites from the outset	Adopt Supplementary Guidance Promote the use of Supplementary Guidance. Encourage pre-application discussions & engage with Children & Families Service to monitor school capacity	Dundee City Council (City Development)	Supplementary Guidance published 2019

Town Centres First

Policy 21 & 22	Town Centre First Principle	Support the city's town centres by ensuring new footfall generating uses locate in the city centre and district centres	Develop a retail study, including health check and liaison with key stakeholders and adopt a strategy	Dundee City Council (City Development)	Published the Review of Retailing in Dundee 2023. Publication of Dundee City Centre Strategic Investment Plan 2050 (CCSIP) 2023
Policy 21 & 22	City Centre Retail Frontages	Support the retail core within the city centre	Managed through DM Officers	Dundee City Council (City Development)	Ongoing as proposals emerge
Policy 23	District Centres Retail Frontage	Support the retail core within District Centres	Managed through DM Officers	Dundee City Council (City Development)	Ongoing as proposals emerge
Policy 24	Goods Range and Unit Size Restrictions	Support the city's town centres by controlling the range of goods and unit sizes within Commercial Centres and major food stores	Managed through DM Officers	Dundee City Council (City Development)	Ongoing as proposals emerge
Policy 25	Gallacher Retail Park Extension	Enable the extension of the retail park	Monitor the status of the bus depot	Dundee City Council (City Development)	Regular monitoring
Policy 26 & 27	Local Shopping Provision & Public Houses, Restaurants and Hot Food Takeaways	Support the development of local shops and services and balance this with the protection of local amenity	Encourage pre-application discussion	Dundee City Council (City Development)	Ongoing as proposals emerge
Sustainable Natural & Built Environment					
Policy 28 & 29	Protecting and enhancing the Dundee Green Network and access to it	Protect and enhance the Dundee Green Network and improve and extend the network of outdoor access routes	Ensure Green Network Guidance is up to date. Use Green Network Guidance to identify opportunities to improve network.	Dundee City Council (City Development)	DCC working with NatureScot and Aecom to deliver a data tool
Policy 30	Green Infrastructure Maintenance	Ensure that arrangements are in place to maintain new elements of green infrastructure	Encourage pre-application discussions	Dundee City Council (City Development)	Ongoing as proposals emerge
Policy 31	Development within the Open Countryside	Restrict new development in areas of Open Countryside	Encourage pre-application discussions	Dundee City Council (City Development)	Ongoing as proposals emerge
Policy 32 & 33	National, International and Local Nature Conservation Designations	Protect designated areas from the negative impacts of development	Encourage appropriate studies to be undertaken to support planning applications	Dundee City Council (City Development) with support from NatureScot	Ongoing as proposals emerge
Policy 33	Local Nature Conservation Designations	Protect designated areas from the negative impacts of development	Encourage appropriate studies to be undertaken to support planning applications	Dundee City Council (City Development) with support from NatureScot	Ongoing as proposals emerge

Policy 34	Protected Species	Protect European protected species from the negative impacts of development	Encourage appropriate studies to be undertaken to support planning applications	Dundee City Council (City Development) with support from NatureScot	Ongoing as proposals emerge
Policy 35	Trees & Urban Woodland	Support the establishment and enhancement of woodland, tree belts and corridors and protect healthy mature trees	Encourage appropriate studies to be undertaken to support planning applications	Dundee City Council (City Development) with support from NatureScot	Ongoing as proposals emerge
Policy 36	Flood Risk Management	Ensure development is not at risk from flooding or exacerbating flooding elsewhere	Ensure appropriate studies are undertaken to support planning applications	Dundee City Council (City Development) with support from SEPA	Ongoing as proposals emerge
Policy 37	Sustainable Drainage Systems	Ensure surface water from new development is managed correctly	Ensure appropriate studies are undertaken to support planning applications	Dundee City Council (City Development) with support from SEPA and Scottish Water	Ongoing as proposals emerge
Policy 38	Protecting and Improving the Water Environment	Ensure new development protects and where possible improves the water environment	Ensure appropriate studies are undertaken to support planning applications	Dundee City Council (City Development) with support from SEPA and Scottish Water	Ongoing as proposals emerge. Work collaboratively with City Engineers to prepare Strategic Flood Risk Assessment
Policy 39	Environmental Protection	Ensure sensitive land uses are protected from inappropriate development	Ensure appropriate studies are undertaken to support planning applications	Dundee City Council (City Development) with support from SEPA	Ongoing as proposals emerge.
Policy 40	Air Quality	Ensure new development does not increase air pollution or introduce receptors into area of elevated concentrations.	Adopt supplementary guidance Encourage pre-application discussions	Dundee City Council (City Development) with support from Neighbourhood Services	Ongoing promotion of supplementary guidance
Policy 41 & 42	Land Contamination & Major Hazard Sites	Adequately control development on contaminated land and next to major hazard sites	Liaise with HSE and update records as requested	Dundee City Council (City Development) with support from HSE	Action required when HSE updates are issued
Policy 43 & 44	Waste	Ensure the city has sufficient capacity to manage its waste	Monitor the city's waste capacity using the SEPA waste capacity tool	Dundee City Council (City Development)	Check capacity using tool
Policy 45	Energy Generating Facilities	Support the development of new energy generating facilities in the right location	Ensure appropriate studies are undertaken to support planning applications	Dundee City Council (City Development) with support from SEPA	Ongoing as proposals emerge

Policy 46	Heat Networks	Support the development of heat networks	Support the preparation of the city's Sustainable Energy and Climate Action Plan and corresponding District Heating Strategy	Dundee City Council (City Development)	Support Climate and Sustainability Team
Policy 47	Wind Turbines	Support the development of wind turbines	Encourage pre-application discussions	Dundee City Council (City Development)	Ongoing as proposals emerge
Policy 48	Low and Zero Carbon Technology in New Development	Reduce the carbon emissions resulting to the use of a development	Encourage innovative solutions to reduce carbon emissions	Dundee City Council (City Development)	Supplementary Guidance published 2019
Policy 49, 50, 51 & 52	Natural and Built Environment	Protect the City's built heritage	Encourage pre-application discussions	Dundee City Council (City Development)	Ongoing as proposals emerge
Policy 53	Gardens and Designed Landscapes	Protect the City's gardens and designed landscapes	Encourage pre-application discussions	Dundee City Council (City Development)	Ongoing as proposals emerge
Policy 54	Safe and Sustainable Transport	Ensure new development safely integrates with transport networks and encourages active travel	Ensure appropriate studies are undertaken to support planning applications	Dundee City Council (City Development) with support from Tactran	Ongoing as proposals emerge
Policy 55	Dundee Airport	Support expansion and safe operation of Dundee Airport	Provide planning advice to support the growth of the airport	Dundee City Council (City Development) with support of HIAL	Ongoing as proposals emerge
Policy 56	Parking	Ensure compliance with DCC road standards	Ensure road standards are up to date	Dundee City Council (City Development)	New guidance to be published 2025
Policy 57	Transportation Interchanges	Encourage and support the development of transport interchanges	Provide planning advice to Tactran to support plans for new and enhanced transport interchanges	Dundee City Council (City Development) with support of Tactran	Timescales led by Tactran
Policy 58	Digital Connectivity	Encourage and support the development of digital infrastructure including communication masts	Support the delivery of broadband through the SG Infrastructure Action Plan	Dundee City Council (City Development)	Ongoing as proposals emerge

Appendix 2: Existing and Effective Land Calculation

The effective land supply is derived from the established land supply (a) – constrained sites (b), a 6-year average has then been applied to reflect the time period since the Dundee LDP 2019 was adopted.

HLA Audit	Established Land Supply (a)	Constrained Sites (b)	Effective Land Supply (a – b)	6 year average (ELS)
2019	4624	235	4398	4263
2020	4747	200	4547	
2021	4672	281	4391	
2022	5004	364	4640	
2023	4408	410	3998	
2024	3888	281	3607	

The 6-year average is then compared to the DCC HLA 2024 Audit Effective Land Supply figure of 3607, and the % decrease over the time period equates to a 15% decrease in the effective land supply covering 6 audit years.

As the target aim will be to adopt the next LDP in 2028, the Council have applied half of the percentage decrease to cover the remaining 3 audit years (2025, 2026 and 2027) at -7.5%. This is applied to the HLA 2024 Audit figure to account for the projected 3 year period, based on evidenced average of delivery in the previous 6 years.

3607 minus 7.5% = 3336*

***Please note that the figure has been rounded to 3300 for ease of interpretation in the Local Housing Land Requirement calculations**

Appendix 3: Site Checklist and Site Assessment

Site Name:	Source of site suggestion: All landowners/interested parties identified/aware?	Current site reference	Planning History: site history, previous planning applications, allocation in the Adopted LDP?
Site Address:	GIS Site Ref:	Outside settlement boundary?	
	Any previous ref:		
OS Grid Ref:	Site Size (ha):	Is the site an allocation in the adopted LDP; sites proposed through call for ideas or any other sites with potential? No Yes ref. Yes but different boundary	Summary Description (topography, features, boundaries, neighbouring issues, access, exposure, aspect etc. Site visit/GIS observations:
Ownership Details:	Projected delivery timescales:		
Current Use e.g. is the site brownfield, vacant and derelict land, greenfield, agricultural?	Proposed Use:	Relevant policies/ proposals from LDP or NPF4:	
Insert Location Plan:		Insert Photographs if available:	

Site Assessment Topic – water Related SEA topics – population and human health, material assets, climatic factors	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/ conclusions
Could the proposal affect the condition of the water environment (water quality, physical condition, water resources, and the migration of wild fish)? See RBMPs for further detail on water condition.	Flood risk and water management Coastal development Blue and green infrastructure					
Could the proposal have a direct impact on the water environment (for example, result in the need for watercourse crossings or a large-scale abstraction or allow the de-culverting of a watercourse)?	Flood risk and water management Coastal development Blue and green infrastructure					
Can the proposal connect to the public foul sewer?	Infrastructure first					
Can the proposal connect to the public water mains? If not, is there a sustainable water source that is resilient to the periods of water scarcity?	Flood risk and water management Infrastructure first					
Are there wetlands or boggy areas on the site?	Flood risk and water management					
For large scale developments, are there any private or public water supplies within 250m of the site which may be affected?	Infrastructure first					
Flood Risk Relative to the floodplain, as defined in NPF4 could the proposal be at risk of flooding (from any source) or result in additional flood risk elsewhere? If flood risk is not fully understood, a Flood Risk Assessment (FRA) should be undertaken. Specify which of the following flood sources are applicable: fluvial, pluvial, sewer, groundwater or coastal.	Flood Risk and Water Management Coastal development					
Could the development of the site help alleviate any existing flooding problems in the area?	Flood risk and Water management					

Topic – Biodiversity, Flora and Fauna Related SEA topics – soils, water, climatic factors...	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/ conclusions
To what extent will the proposal conserve, restore and enhance biodiversity?	Biodiversity Natural Places					
To what extent will the proposal facilitate the creation of nature networks and improve ecological connectivity?	Natural places Biodiversity					
International Designations - SAC/SPA, Ramsar, World Heritage Sites. To what extent will the proposal affect these sites including via connectivity?	Natural places Biodiversity					
National Designations To what extent will the proposal affect national designations – e.g. SSSI, NNR	Natural places biodiversity					
To what extent will the proposal affect other designations - and locally important designations such as LNRs.	Natural places Biodiversity					
To what extent will the proposal affect Non designated – e.g. trees, TPOs, hedges, woodland, (including woodlands in the Ancient , Semi Natural and Long Established Plantation Woodlands), species rich grasslands	Natural places Biodiversity					
Protected Species—e.g. bats, otters, etc - can it be ascertained if protected species will be affected and will a site survey be required?	Natural places Biodiversity					
To what extent will local geodiversity sites or wider geodiversity interests that could be affected by the proposal?	Soils Natural place Biodiversity					
How will habitat connectivity or wildlife corridors be affected by the proposal – will it result in habitat fragmentation or greater connectivity?	Biodiversity Tackling the climate and nature crisis Forestry, trees and woodland.					

Topic – Climatic Factors Related SEA topics – population, human health, water, biodiversity, material assets, soils, air, cultural heritage, landscape	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/ conclusions
To what extent will the proposal involve sediment extraction/reclamation or changes in coastal processes that could result in coastal flooding?	Climate mitigation and adaptation Coastal development					
To what extent will the proposal promote and enable adaptation to climate change?	Climate mitigation and adaptation					
To what extent does the proposal use nature based solutions for climate change mitigation and adaptation?	Climate mitigation and adaptation Infrastructure First Blue and Green infrastructure					
To what extent does the proposal maintain and enhance resilience of existing and planned grey and green infrastructure?	Climate mitigation and adaptation Infrastructure first Blue and Green infrastructure					
To what extent does the proposal have good proximity to services and good access to existing or proposed public transport and active travel network?	Climate mitigation and adaptation Infrastructure First.					

Topic – Air Quality Related SEA topics – climatic factors, soils, population and human health	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments /conclusions
Could the proposal lead to Local Air Quality Management thresholds being breached in an existing Air Quality Management Area?	Climate mitigation and adaptation Health and Safety					
Could the proposal lead to the designation of a new Air Quality Management Area (AQMA)	Health and safety					
Does the proposal introduce a new potentially significant air emission to the area (e.g. combined heat and power, an industrial process, large scale quarry etc.)?	Health and safety					
Will the proposal lead to a sensitive use being located close to a site with noise/odour issues or a site regulated for emissions to air by SEPA (e.g. new housing adjacent to a large manufacturing factory)	Health and safety					

Topic – population and human health Related SEA topics – climatic factors, air, water, soils, material assets	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/ conclusions
Is the proposal within the vicinity of a major accident hazard site or major accident hazard pipeline?	Health and safety					
Will the proposal affect service infrastructure: Education capacity - Secondary School Catchment Area/ Primary school catchment area Health provision/GP capacity						
To what extent will the proposal affect the quality and quantity of open space and connectivity and accessibility to open space or result in a loss of open space?	Design, Quality and place local living and 20 min neighbourhoods Blue and green infrastructure Play, recreation and sport					
To what extent will the proposal affect core path links or other key access networks such as cycle paths, coastal paths and rights of way?	Sustainable Transport Design, quality and place Local living and 20 minute neighbourhoods Infrastructure first					
Will the proposal have the opportunity to incorporate new or enhance existing blue and/or green infrastructure providing multiple benefits such as enhanced biodiversity, management of surface water?	Blue and Green infrastructure Infrastructure First					

Topic – Soils Related SEA topics – landscape, cultural heritage, water, biodiversity, flora and fauna, material assets.	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/ conclusions
Does the proposal make use of a brownfield site or contaminated and vacant and derelict land? If on brownfield, is the site naturalised?	Soils Brownfield, vacant and derelict land					
Are there any contaminated soils issues on the site and if so, will the option employ remedial actions to ensure the site is suitable for use (as defined in PAN 33)?	Soils					
Is the proposal on peat or carbon rich soils and could the development of the site lead to a loss of peat or carbon rich soils?	Soils Climate mitigation and adaptation					
Does the proposal result in the loss of prime agricultural land or land that is culturally or locally important for primary use as identified by the LDP?	Soils					

Topic – Landscape Related SEA topics – climatic factors, air, water, soils, material assets, biodiversity, population and human health	NPF4 Policy Topic	Scoring pre-mitigation	Mitigation	Enhancement	Scoring post-mitigation	Comments/ conclusions
National landscape designated sites To what extent will any designated sites be affected – including NSAs, Regional Scenic Areas, and local landscape designations?	Natural Places					
Regional and local landscape designated sites To what extent will any designated sites be affected – Regional Scenic Areas, and local landscape designations?	Natural Places					
Non designated landscape features and key landscape interests Does the proposal ensure that development does not exceed the capacity of the landscape to accommodate it? Such as current settlement boundaries, existing townscape and character of surrounding area and its visual qualities?	Natural Places					
To what extent will the proposal affect features of landscape interest, including the distinctive character of the landscape and the qualities of wild land?	Natural places					

Topic – Cultural Heritage Related SEA topics – Climatic factors, air, water, soils, material assets, biodiversity, landscape	NPF4 Policy Topic	Scoring pre- mitigation	Mitigation	Enhancement	Scoring post- mitigation	Comments/ conclusions
Does the proposal protect or enhance the site or setting of: • World Heritage Sites* • Scheduled Monuments • Listed buildings • Inventory battlefields • Inventory gardens and designed landscapes • Conservation Areas • Undesignated historic environment assets • Streetscapes and settlement patterns monuments	Historic assets and places Natural Places					
Does the proposal promote or enable the retention, maintenance and sustainable use or re-use of historic buildings and infrastructure?	Historic assets and places Zero waste Infrastructure first Brownfield, vacant and derelict land and empty buildings City, town, local and commercial centres Rural development					
Topic – Material Assets – Deliverability/ sustainability constraints Related SEA topics – climatic factors, air, water, soils, population and human health.	NPF4 Policy Topic	Scoring pre- mitigation	Mitigation	Enhancement	Scoring post- mitigation	Comments/ conclusions

Will the site be delivered within the LDP timeframe? Other site servicing constraints, e.g. electricity pylons, underground gas pipelines etc.						
Site aspect – does the site make best use of solar gain? Is the site protected from prevailing winds?	Design Quality and place Climate Mitigation and Adaptation Heat and Cooling					
Is the site in an area of heat network potential or a designated Heat Network Zone (HNZ)?	Climate Mitigation and adaptation Heat and cooling					
Vehicular Access constraints or opportunities - Is the network capable of accommodating active travel, public transport, other shared modes, and private vehicle traffic generated?	local living and 20 min neighbourhoods Sustainable transport					
Is the site close to a range of facilities? Can these be accessed by public transport or active travel?	local living and 20 min neighbourhoods Sustainable transport City, town, local and commercial centres					
Does the proposal minimise demand for primary resources by reusing an existing building?	Zero waste					
For waste infrastructure and facilities (except landfill and EFW) does the proposal comply with the criteria listed in NPF4 policy 12 d)?	Zero waste					

Appendix 4: Review of Previous Engagement, Lived Experience Data

Consultation exercise	Geographical Area covered	Key Priorities/Issues Identified (which LDP has capacity to address)
Locality Community Plans 22-27	Strathmartine	Develop a network of community growing spaces and community gardens.
		Establish a network of community support hubs in Ardler, St Marys and Kirkton.
	Lochee	Improve green spaces in the central Lochee area focused on: • Play improvements, • Improve green spaces, and • Develop green trails for walking and cycling.
		Establish a “campus” of agencies and stakeholders who will plan celebratory events, street art improvements, heritage projects, environmental and physical improvements.
	West End	Develop structures which allow for community involvement in identifying, developing and taking part in greenspace enhancements.
	Coldside	Increase and develop the number of growing spaces.
	Maryfield	Establish a group to produce an Albert Street area plan.
		Explicitly link the work of groups, walkabouts, Community Choices and the Regeneration Forum to improve local spaces.
	North East	Take collective action to develop green spaces and playparks identified as most in need of improvement.
Engage Dundee 2023: Exploring Citizens’ experiences of the cost of living crisis.	East End	Take collective action to develop and increase usage of public and green spaces Increase local opportunities for community growing.
	The Ferry	Develop structures which allow for community involvement in identifying, developing and taking part in greenspace enhancements.
Engage Dundee 2021	City-wide	Affordability of public transport, social isolation, declining physical and mental health, usage of support services.
	Coldside	Substance misuse, poor public transport links, lack of quality greenspace, community food growing, access to public space for people with disabilities, cycle paths, pavement parking

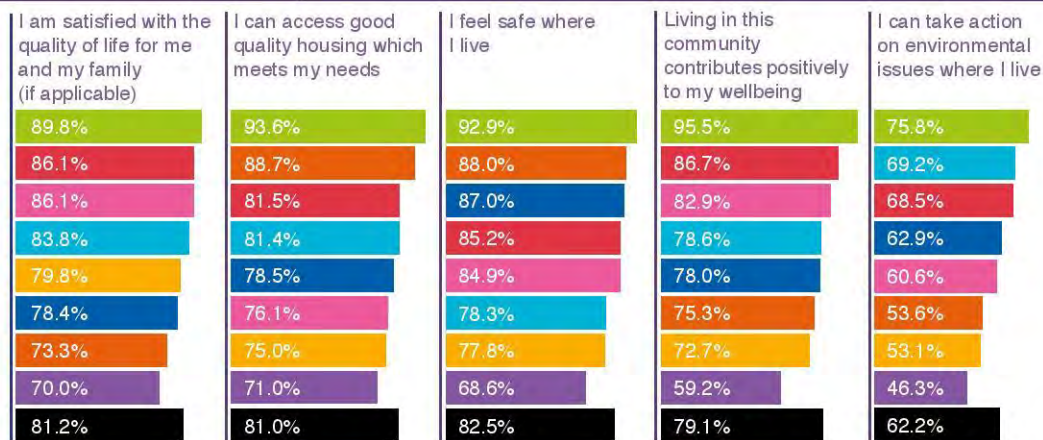
	East End	Lack of access to pharmacy and GP, better community spaces, not enough play spaces, poor public transport links, cycle safety and infrastructure, blue and green infrastructure
	Lochee	Affordable housing, substance misuse, poor lighting of public space, poor public transport links, lack of parking, improved cycle path and road surfaces.
	Maryfield	Old and poor quality tenement housing, accessibility of play parks, blue and green infrastructure, litter, community facilities, cycle path improvements, used as through route.
	North East	Lack of community/sports facilities and local shops with healthy food provision, poor quality play spaces, road safety, ageing population, walkability, unreliable public transport
	The Ferry	Lack of access to GP, speeding, not enough street lighting, less cars, more natural habitats/biodiversity, bus stops closer to home, cycling and walking infrastructure
	Strathmartine	Anti social behaviour, poor quality and deteriorating housing, poor traffic management, poor quality greenspace, more outdoor seating, frequency of buses, road safety
	West End	Play opportunities for older kids, anti social behaviour, speeding, lack of parking, lack of community facilities, poor road/pavement surfaces, expensive public transport.
Hello Dundee	City-wide	Greenspace use, shopping locally, food growing, active travel, ward/climate justice.
Regeneration and Area Masterplans- Consultation with communities	Mill O Mains	Lack of community facilities, fear of crime, unsafe play areas, dark pedestrian routes, lack of access to greenspace, antisocial behaviour.
	Lochee	Housing quality and design, unsatisfactory pedestrian links with High Street, unattractive vacant sites, limited retail choice, need for additional play spaces and seating areas.
	Whitfield	Tenure mix, active travel, quality of greenspace, flooding, vacant and derelict land.
	Hilltown	Housing types, greenspace, public art, active travel, public transport, lack of community building, better links to sports and recreation facilities.
	Western Gateway	Pedestrian safety, path quality, lack of public transport, education provision, accessible housing, anti-social behaviour.
LDP 2019- Main Issues Report, Place Standard Tool workshops	City-wide	To ensure effective integration of land use planning and community planning, Planning Officers worked alongside Communities Officers to identify the key land use issues within the eight Local Community Plans. Land use issues such as open space,

		housing and community facilities were identified across the City and these were then used to help inform the Main Issues Report and the subsequent Proposed Plan. The innovative use of the Place Standard Tool to facilitate consultation on both the Local Development Plan and Local Community Plans ensured shared practice and a consistent approach to the gathering of community concerns and issues which have fed into the content of the City's land use and community plans.
City Centre Strategic Investment Plan: Consultation Outcomes Report 2023	City Centre	Diversity of housing types, lack of vital facilities like GPs and schools, vacant and derelict land, affordable housing, flexible office accommodation, digital connectivity, public transport, air pollution, biodiversity, blue and green infrastructure.

Appendix 5: Engage Dundee 2021 Ward Comparison

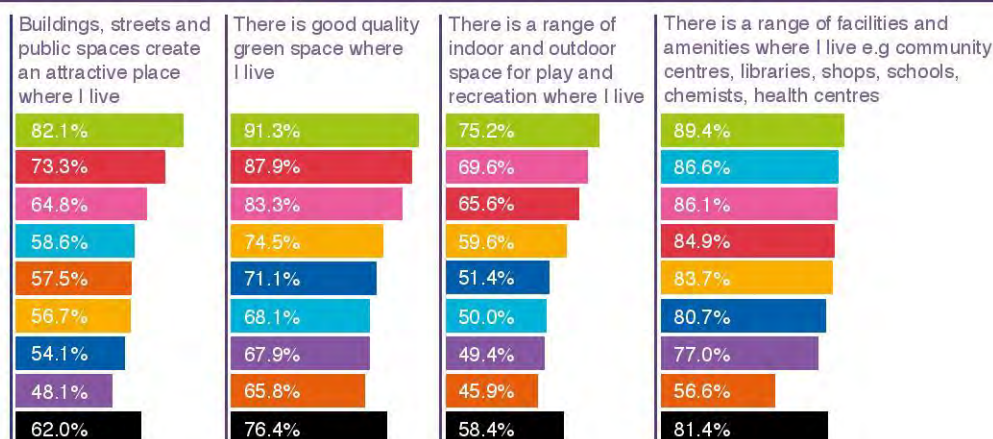
Community Living

Coldside • Dundee • East End • Lochee • Maryfield • North East • Strathmartine • The Ferry • West End



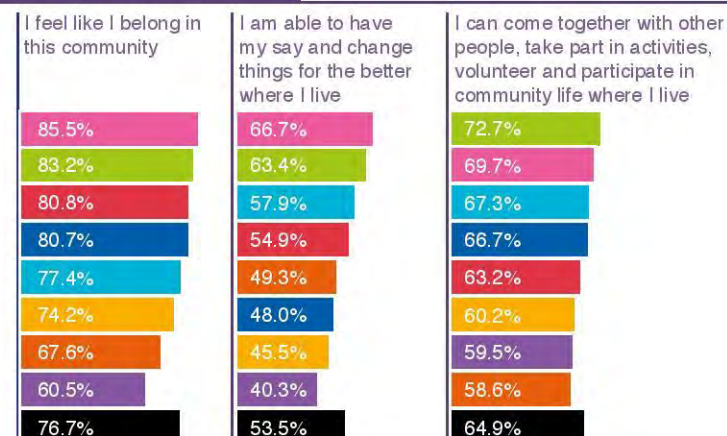
Community Spaces

Coldside • Dundee • East End • Lochee • Maryfield • North East • Strathmartine • The Ferry • West End



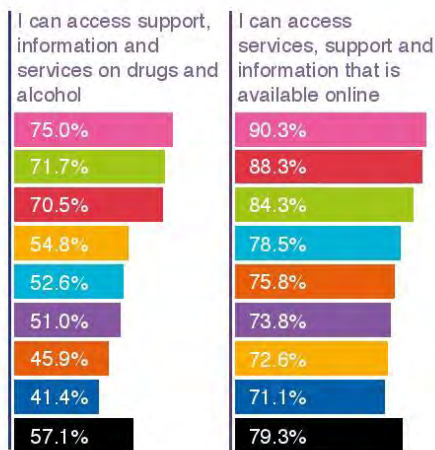
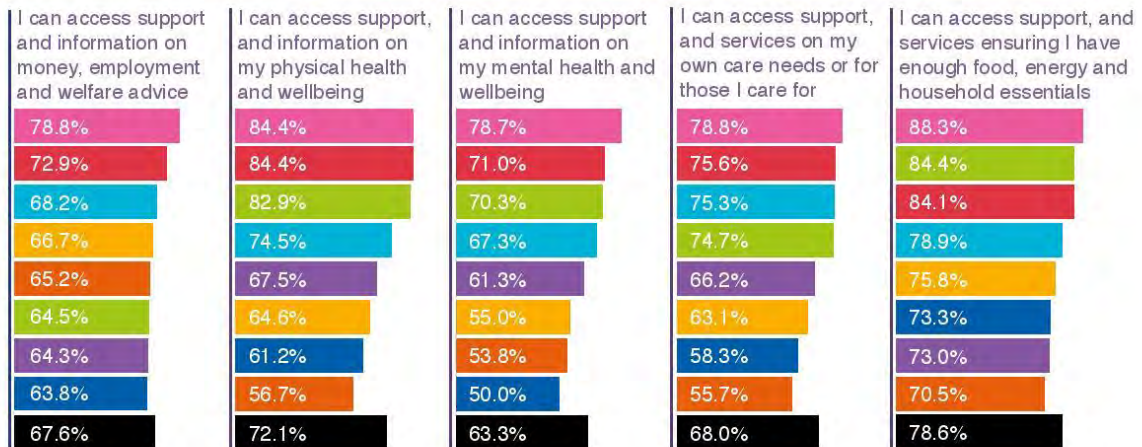
Community Spirit

Coldside • Dundee • East End • Lochee • Maryfield • North East • Strathmartine • The Ferry • West End



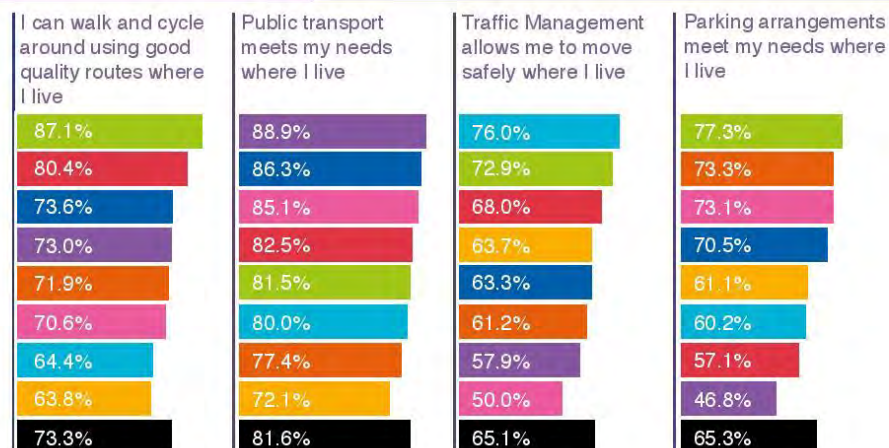
Community Support

Coldside • Dundee • East End • Lochee • Maryfield • North East • Strathmartine • The Ferry • West End



Community Travel

Coldside • Dundee • East End • Lochee • Maryfield • North East • Strathmartine • The Ferry • West End



Appendix 6: Evidence Report Consultation

Introduction

This report summarises the consultation and engagement activity that has been undertaken to assist in the gathering of information for the Evidence Report. The engagement has taken many forms including online surveys, events, meetings with key stakeholders, and consultation of technical reports covering a range of topics.

Section 16(B) of the Planning (Scotland) Act 2019 sets out requirements for engagement in preparing the Evidence Report. The Evidence Report must also include a statement on how the planning authority has sought, and taken into account, the views of the public at large, children and young people, disabled people, gypsies and travellers, key agencies and community groups. There is also a requirement to set out how the authority has invited local communities to prepare Local Place Plans, and what assistance they have provided. This consultation summary along with information detailed within the Schedules is intended to fulfil these statutory provisions.

Topic Paper Consultation

As part of the Evidence Gathering stage, the Council undertook consultation on ten thematic topic papers aligning with National Planning Framework 4. These papers were published and consulted on through a phased approach between April and October 2024, with further correspondence following with consultees.

Stakeholder working groups were established to inform the drafting of each topic paper. These groups included internal Dundee City Council representatives and external experts from the Key Agencies Group, as well as other relevant stakeholders. Their input helped develop a robust evidence base for each theme.

Stakeholders were then invited to review the topic papers, identify gaps, and highlight areas of agreement or dispute. Feedback from this process has informed the Evidence Report and will help shape the Proposed Local Development Plan. Details of the stakeholder working groups for each topic paper are provided in the relevant Schedules of the Evidence Report.

The topic papers covered the following themes:

- Biodiversity, Natural Places, Trees, and Soils;
- Town Centre First and Economy;
- Health & Safety;
- Sustainable Transport;
- Design, quality and place;
- Climate change, mitigation and adaptation, environmental responsibility;
- Business and Industry, Brownfield, Vacant and Derelict Land, and Buildings;
- Water Environment, Open Space, Play and Sport;
- Quality Homes and Site Assessment Methodology;
- Infrastructure First and Local Living

Key Agency Group Collaborative Local Development Plan Pilot

Dundee City Council was selected to receive support from the Key Agencies Group as part of a national pilot involving six local authorities across Scotland. This initiative introduced a new style of collaborative working to strengthen evidence gathering for LDP reviews.

A series of workshops were held with internal Council services, key agencies, and community representatives to establish a place-based approach. These sessions explored strategic and local issues affecting Dundee, including the Maryfield Ward, and examined key strengths, challenges, drivers for change, and opportunities. Outcomes were documented in the Key Agency Group – Corporate Workshop Report [DED170](#) and the Maryfield Area Level Workshop Report. This collaborative process is expected to lay the foundations for future joint work on spatial strategies, place briefs, and masterplans at the Proposed Plan stage.

Place Standard Survey

To inform the evidence base for the next LDP, Dundee City Council launched an interactive GIS-based Place Standard Survey from April to August 2024, receiving 216 responses. The survey invited residents, community groups, businesses, and other stakeholders to assess neighbourhood quality using the Place Standard Tool.

Engagement included tailored sessions for children and young people, such as a workshop at Blackness Primary School with 23 pupils using child-friendly maps. In June 2024, two planning officers led a Place Standard session tailored for children and young people at Blackness Primary School, guiding a class of Primary 4 pupils through the process using child friendly maps of the local area. The pupils were asked to place a point on a map and the feedback gathered from the survey provided valuable insights into the quality of public spaces and opportunities for play and recreation across the city.

Play Sufficiency Survey

As part of statutory requirements, the Council undertook a Play Sufficiency Assessment to evaluate the quality, quantity, and accessibility of play spaces across Dundee. This included physical audits, GIS-based analysis, and public consultation.

Between May and August 2024, an online survey gathered feedback from children, young people, parents, carers, and professionals. Due to low initial participation from young people, the survey was reopened in January 2025 for eight weeks. To encourage engagement, education officers asked Headteachers to share the survey with teachers and incorporate it into class activities for students to complete online. With the targeted outreach in schools this provided a total of 319 responses were received, including 302 individual submissions and 17 group responses (representing an additional 260 children and young people).

Despite strong engagement with primary school pupils, participation from secondary school age young people was limited, suggesting that language and framing around “play” may not resonate with older age groups. Lessons learned will inform future engagement during further consultation stages of the LDP review.

Local Place Plan

The Planning Team worked collaboratively with the Communities Team to agree the type of support and guidance to be provided to communities preparing Local Place Plans. In May 2023, the Council issued a formal invitation to communities to prepare Local Place Plans in accordance with legislative requirements, supported by guidance and engagement. Several community groups expressed interest and during 2025 submissions of two Local Place Plans had been received and validated.

Engagement with Specified Groups

Public at Large and Community Groups

The Place Standard Survey, Topic Paper Engagement and Play Sufficiency Survey described above, were the primary methods used to engage the public at large. The large number of individual comments across each of the Place Standard Survey and Play Sufficiency themes were collated and summarised. The use of interactive GIS surveys allowed and engagement from the public across the City has allowed for the Evidence Report to include within the Design Quality and Place Schedule an analysis of key points which emerged and a breakdown of key responses across the wards within the city.

The Evidence Report surveys were designed to be accessible to people of all ages. Council Communities officers, the Community Empowerment Team and Education officers were briefed on these surveys and asked to assist anyone facing challenges in completing the survey, for example due to lack of internet access or language barriers.

Significant publicity and advertisement of the surveys were issued to raise awareness. The Dundee City Council website was the primary mechanism for advertising the consultation supported by press releases including use of social media at key phases of consultation. In addition, the Planning Team issued direct email mailshots to the LDP mailing list with reach to over 250 individuals and organisations including key agencies, community groups, developer stakeholders and members of the public. In addition, posters were displayed in community centres to encourage participation, surveys were also shared directly to community groups such as Tenants and Residents Groups, 'Friends Of' groups, Primary and Secondary Schools, Community Councils, and Community Partnerships/Forums. There was positive take up and engagement from community groups across Topic Paper engagement, Place Standard Survey and Play Sufficiency Survey as well as two Local Place Plans submitted.

Accessibility was also considered with paper surveys made available in libraries, and support was provided by Communities officers and the Community Empowerment Team to assist those facing barriers such as lack of internet access, disability or language challenges.

Children and Young People

The preparation of the Play Sufficiency Assessment Survey and Place Standard Surveys, as detailed above, were the primary methods that sought responses via a consultation survey with children and young people which sought their views on open spaces and play opportunities in the area. As with the public at large, the comments received from children and young people in response to the Play Sufficiency and Place Standard surveys were summarised and the key points included within the Evidence Report.

Disabled Persons

As part of the publicity of the Topic Paper, Play Sufficiency Assessment and Place Standard Survey consultation organisations were contacted through the LDP mailing list and press release which contained information on how to get involved in the process. Across all the consultation surveys an optional question requested whether respondents noted if they considered that they had a disability and 91 people completed that section stating they have a disability. Comments by disabled members of the public were collated as part of the evidence and summary points included in the Evidence Report.

Gypsies and Travellers

As detailed in the Evidence Report, the Greater Dundee Housing Need and Demand Assessment 2023 ([DED134](#)) and the accompanying study on 'Accommodation Needs of Gypsy/Travellers and Travelling Showpeople in the TAYplan Area' provides the most up-to-date evidence on accommodation requirements for Gypsy/Travellers in Dundee. This includes information on existing site provision, occupancy trends, turnover rates, and projected capacity.

This recent existing engagement with the Gypsy/Traveller community and engagement with the Council's Gypsy Traveller Engagement Officer was therefore used as the basis and

informed the content of the Evidence Report. As the review of the LDP progresses and in tandem with the Local Housing Strategy Actions engagement will focus on understanding site quality and accessibility and identifying priorities for improvement. Insights gathered will ensure that the Proposed Plan responds to statutory requirements and reflects the needs of Gypsy/Traveller communities.

Key Agencies

As part of preparing the Evidence Report, the Council has engaged extensively with the Key Agencies to gather relevant information and seek agreement on the evidence presented.

As detailed above, this engagement began early through participation in the Key Agency Group Collaborative LDP Pilot workshops and continued through the Topic Paper Consultation process.

In addition, targeted meetings and correspondence with individual key agency organisations on specific topic matters took place to strengthen and corroborate the evidence base. Full details of engagement with the Key Agencies are outlined within the respective Schedules of the Evidence Report.

Regional Working and Collaboration

The Council recognises the importance of regional collaboration in delivering effective spatial planning and addressing cross-boundary issues. In line with the expectations of the Planning (Scotland) Act 2019 and the Local Development Planning Guidance, the Council are actively working with neighbouring authorities and regional partners on a range of strategic matters such as;

Housing Need and Demand Assessment (HNDA)

A key area of evidence and collaborative working at regional level is the Tayside wide Housing Need and Demand Assessment (HNDA) for the Tayside region. This work undertaken in partnership with Angus and Perth & Kinross Councils ensures a consistent and robust evidence base for housing across the region, reflecting shared housing market areas, migration patterns, and economic linkages.

Infrastructure and Transport

The Council continues to engage with the Tayside and Central Scotland Transport Partnership (Tactran) and neighbouring authorities, to align land use planning with regional transport strategies. This includes coordination on active travel networks, public transport corridors, and strategic infrastructure investment, ensuring that development proposals support sustainable and integrated transport solutions across the region.

Climate Change and Natural Environment

Dundee is also working with regional partners on climate adaptation and environmental resilience through groups such as Climate Ready Tayside. This collaboration supports shared responses to flood risk, biodiversity enhancement, and nature network connectivity, particularly along the Tay Estuary and Dighty Burn catchment, which cross administrative boundaries.

Economic Development and Spatial Strategy

The Council contributes to regional economic planning through the Tay Cities Deal and associated spatial strategies. This includes joint working on employment land supply, digital infrastructure, and regeneration priorities that have regional significance.

Next Steps

The Council will continue to engage with neighbouring authorities, key agencies and regional partners to ensure that regional issues are fully addressed in the Proposed Plan. This includes exploring opportunities for joint policy development, and alignment with any emerging Regional Spatial Strategy.

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