

Dundee City Council  
Dundee Local Development Plan 2  
Main Issues Report Consultation Response Summary  
March 2016



# Contents

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1 - Introduction	2
2 - Summary	5
3 - Spatial Strategy	19
4 - Policy Framework	20
5 - Other Issues	22

# 1. Introduction

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The Main Issues Report (MIR) is the key stage for consultation and engagement in the preparation of the Local Development Plan. As well as the statutory requirements the Development Plan Team sought to go above and beyond in order to engage with a wide spectrum of stakeholders.

As required by the legislation the publication of the Main Issues Report was advertised in the local press, published on the Council website, notification was sent to Key Agencies, Neighbouring Authorities and Community Councils and copies were made available at Council Offices and public libraries.

In addition a number of activities were carried to raise awareness of the consultation which included:

- Drop in/Static displays at Dundee House and Central Library (Wellgate).
- E-mail mailshot to all on the Local Development Plan mailing list (225 contacts)
- Posters in libraries and local Council offices, Olympia, Dundee Science Centre and University of Dundee
- Leaflets available in libraries and local Council offices as well as a copy of the MIR, Strategic Environmental Assessment (SEA) and other related documents.
- Press release in local press with articles appearing in the Courier regarding the consultation
- Website was updated with details of the consultation
- Presentations were requested by and given to West End Community Council and Broughty Ferry Council
- Presentation was given to Dundee Partnership/Local Community Planning Partners
- Workshop with key agencies

The consultation also provided an opportunity to take a new approach to consultation through targeted workshops and the use of the Place Standard Tool. With this approach officers were able to directly engage with over 300 people during the consultation. 60 written responses to the consultation were received as well as 90 Place Standard Assessments (compared to 91 overall responses in 2011).

Place Standard workshops were held with the Pupil Council, Youth Council, Hot Chocolate Trust youth charity, Dundee International Women's Centre and the elderly. Each workshop was designed to meet the needs of the participants. Youth workshops were short with a choice for the young people on how they would like to engage with the material. Some participants preferred to quickly respond to questions and others opted for discussion with facilitators.

The workshop with the Dundee International Women's Centre displayed the issues visually and with the help of staff and translators was able to overcome language and cultural barriers to engagement. The elderly workshop used the Place Standard Tool in its fullness, with participants working in groups according to where they lived, allowing plenty of time for discussion and to provide comments.

The comments and feedback received through these workshops have been analysed and considered as part of the MIR consultation but participants were also encouraged to make formal representation to the Main Issues Report.

A facilitated workshop was held with housebuilders, housing associations, agents, architects and interested parties in relation to Main Issues 3, 4 and 5 to look at supply of housing, housing density in district centres and provision of housing for lifetime communities particularly housing for the elderly. The workshop was held in City Chambers with 35 participants who worked in facilitated groups to discuss and provide feedback on the issues. Participants were encouraged to submit formal representations in response to the MIR.

A drop in event was held to look at the options for Main Issue 3: Blackness General Economic Development Area. The event was held at Verdant Works in the heart of the area and attracted approx. 50 participants including local residents, local businesses and interested parties. Comments were collected on the day and participants were encouraged to submit a formal representation to the Main Issues Report.

Dundee has sought to ensure a 360 degree approach to integrating the LDP with the Community Plan. Early analysis of land use elements of the SOA and Local Community Plans led to identification of common themes that were fed into the review process of the Local Development Plan. Following the Place Standard workshops a presentation with Dundee Partnership fed back what we had done, the benefits and outcomes of not only the consultation but the use of the Place Standard Tool. In addition the comments received through the consultation have been collated in to Local Community Plan areas which have been shared with Communities Officers to feed in to the new Local Community Plans. Communities' officers subsequently used the same method of consultation to carry out the City Wide "Engage Dundee" consultation. The results of this consultation have been fed back as part of the preparation of the Proposed Plan.

All the representations received, either written or through workshops have been analysed, considered and where appropriate action has been identified by Officers. For full details of who submitted a written representation, the content, analysis, response and action points, please see the proformas that have been prepared in relation to each of the issues. These can be found on the website via

[www.dundee.gov.uk/localdevplan2](http://www.dundee.gov.uk/localdevplan2)

The following sections provide a summary of the key issues that were raised in relation to each of the main issues as well as the spatial strategy, policy framework and other general issues.

## 2. Summary

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### **Main Issue 1: Safeguarding Employment Land**

15 responses were received in relation to Main Issue 1.

7 of the responses supported the preferred option set out in the Main Issues Report which sought to retain the existing allocation for employment land with no new allocations.

8 of the responses supported alternative option 1 which proposed to protect land within Strategic Development Areas but reduce the level of designated employment designation within Principal and General Economic Development Area. Comments sought to remove land at South West Dunsinane, Dock Street and the Aldi Site east of Myrekirk Road from the Principal Economic Development Area. Removal of Stewart's Cream of the Barley at Mid Craigie Industrial Estate from the General Economic Development Area designation was also proposed. Proposals for redevelopment on each of these sites were proposed such as residential and commercial.

A relaxation of uses was proposed for Blackness General Economic Development Area through a masterplan. This is explored further under Main Issue 2.

Issues were also raised with regards to the amount of employment land designated and in particular the amount of derelict land. It was proposed that some of this land should be reallocated for residential use to meet housing need in the city.

There was general support for non-employment uses being allowed within General Economic Development Areas.

## **Main Issue 2: Blackness General Economic Development Area**

17 responses were received in relation to Main Issue 2.

All of the responses supported the preferred option set out within the Main Issues Report which sought to adopt a more flexible policy approach for the Blackness General Economic Development Area and to produce a masterplan to promote opportunities for development.

With the general decline highlighted within the area, representations suggested a number of uses; residential including student accommodation, leisure uses, open space, recycling, food and drink production, café/restaurants, retail for bulky goods as well as links to the creative arts, conference facilities and social space. Parking was however identified as a current issue within the area.

In terms of residential use some concern was raised that if this use was allowed within the area this would sterilise surrounding land for industrial use.

A masterplan approach was supported with one of the submissions providing an initial masterplan concept for the area.

### **Main Issue 3: Supply of Land for Housing**

38 responses were received in relation to Main Issue 3.

18 of the responses were in support of the preferred option as set out within the Main Issues Report. The preferred option sought to continue the current brownfield led approach with the allocation of greenfield land at Linlathen and Baldragon. Whilst supportive in general, several issues and comments were raised in relation to this option. It was considered that whilst a brownfield land led approach was supported a review was needed of the current brownfield land allocation to ensure that they were effective for delivery of housing land. There was a question over the 20% given for housing delivery through windfall development and a need for further justification. Support was given for additional greenfield land release to the east and west. Site specific support was given to land at Camperdown Leisure Park, Western Gateway, Land at Pitkerro, Balgarthno, North Grange Farm, Riverside Drive, Ballumbie Village and Linlathen.

5 of the responses were in support of alternative option 1 which continued the current brownfield land led approach with greenfield allocations at Linlathen and Baldragon but also would allow a managed release of greenfield land in the west of the city in the later stages of the plan. Support was given to the managed release of greenfield land with site specific support given to West of South Gray and South Auchray. Concerns were raised regarding the infrastructure costs, the existing road infrastructure, level of public transport and school provision with the delivery of greenfield development at Linlathen. A question was raised over the need for housing at Linlathen given recent approval for development on greenfield site at Monifieth.

3 responses were in favour of alternative option 2 which continued the current brownfield land led approach with greenfield allocations at Linlathen and Baldragon but also would allow a managed release of greenfield land in the east of the city in the later stages of the plan. Site specific support was given to land to east of Strathyre Avenue, North Grange and Linlathen. There was general support for land release in the east of the City.

5 responses were in favour of alternative option 3 which continued the current brownfield land led approach with greenfield allocations at Linlathen and Baldragon and no further greenfield land release in the City. There was support for no further greenfield land release with brownfield to take a priority over greenfield. Comments were received in relation to the delivery of the Western Gateway and the need to focus on the provision of infrastructure and facilities.

7 responses did not refer to any preferred option but raised various issues regarding the delivery of housing land. It was considered that a justification was needed for the allocation of an additional 20% of housing land allocations within the city. There was support for the delivery of a mix of housing and in particular affordable housing and a need for clarification on how this would be delivered through the plan. Non-effective housing sites and in particular brownfield should be removed from the plan with support for greenfield land release to the west and east of the city. The delivery of housing in the city should be accompanied with suitable amenities, shops, GP surgery, community facilities, transport links, schools and open space with the design of housing to be in keeping with the surrounding area.

## **Main Issue 4: Increasing Housing Density in the District Centres**

18 responses were received in relation to Main Issue 4.

11 responses were in support of the preferred option which proposed to apply City Centre Appendix 3 Design of New Housing Standards to applications for new build housing or a change of use within or immediately adjacent to District Centre boundaries. Whilst supportive, a number of comments were received seeking to resolve issues regarding residential parking provision, provision of family housing due to the surplus of flats as identified through TAYplan and the need to consider air quality where density is increased.

No responses were received in relation to alternative option 1.

5 responses were in support of alternative option 2 which continued with the current Appendix 3 Design of New Housing Standards and proposed to include text to encourage higher density development in and adjacent to District Centres. It was considered that this higher density should only apply where it was appropriate and should allow flexibility for the market to respond to each site according to local characteristics and constraints. Consideration of the District Centre boundaries was needed and in some cases widened (Perth Road, Hilltown and Albert Street) in order to accommodate housing development within or adjacent to the centre. Further flexibility is needed in terms of design standards in particular garden ground/amenity space where smaller house types are proposed.

2 responses had no preferred option but raised other issues for consideration. The role of green infrastructure in the urban environment was highlighted. Concern was raised that the preferred option would be potentially restrictive. Further clarification was needed on what is meant by “within or immediately adjacent to” a district centre. It was considered that District Centre boundaries were too tight and therefore questioned whether there were realistic opportunities for development.

## **Main Issue 5: Promoting Lifetime Communities – meeting the housing needs of older people**

22 responses were received in relation to Main Issue 5.

6 responses were in support of the preferred option which sought to encourage a wider range of housing to meet the needs of the elderly and adaptable for specific needs and would require an obligation for the submission of a Design and Access Statement with planning applications for housing. It was proposed that this approach should be applied to the Western Gateway to provide adaptable housing. It was raised that there was an opportunity for a pilot scheme for the provision of smaller flats with families on upper floors and elderly on lower floors providing lifetime communities.

No responses were received in relation to alternative option 1.

13 responses were received in relation to alternative option 2 which maintained the current policy requirements and relied on market demands to encourage mainstream housing developers to meet housing needs. It was considered that in order to ensure a broad range of housing type and tenure, sufficient deliverable land needed to be identified including sufficient greenfield sites. Locational issues were raised in relation to new sites for housing and potential lack of public transport provision therefore consultation was needed with elderly on location of housing. The provision for housing for varying needs was felt to be encompassed by Building Regulations. All new homes are now built with an ability to be easily adapted for older people and disabled. It was therefore considered to be the remit of Building Standards to deliver this standard rather than Planning. The requirement for a Design and Access Statement was considered an unnecessary burden on developers.

4 responses indicated no preferred option but raised some comments regarding this issue. It was considered that clarification was needed on what was meant by “specific needs”. As part of the consultation on the Main Issues Report workshops were held with the BME community and as well as elderly people who indicated their support for this approach but indicated that there was a need to provide a choice of housing for people for different needs. They also considered that it was important to provide high quality new developments in sustainable locations within the city.

## **Main Issue 6: Putting Our City Centre and District Centres First**

19 responses were received in relation to Main Issue 6.

16 responses supported the preferred option which seeks to adopt a sequential town centre first approach to assess proposals for uses which generate significant footfall. It was considered that the continued viability and vitality of these centres was more than just the uses but the overall places and how people moved through them. It was considered there is a need to strengthen physical and visual connectivity and therefore a link between Main Issue 6 and Main Issue 10 (Maximising green infrastructure). It was raised that consumer demands and retail formats are changing with an increase in internet shopping and a desire to shop local and more frequently. It was considered that the existing distribution of district centres does not serve certain areas of the City and there is not always the availability of sites within District Centres. They are often traditional high streets with smaller units and limited opportunities for expansion therefore some flexibility should be allowed. The policy approach needs to be more explicit on what is meant by a “sequential town centre first approach” with specific reference to paragraph 68 of the SPP. There was concern that there would be an embargo on convenience and comparison expenditure being directed to commercial centres if the City or District Centres are unable to meet demand. Site specific reference was made to Kingsway West Retail Park and support for the provision of retail shortfall within the City. It was highlighted that sustainable transport options should be provided reducing dependency on the private car.

3 responses indicated support for alternative option 1 which was to maintain the current policy approach which excludes Class 4 from City Centre/District Centres via the sequential approach. It was considered that the sequential approach is a well-established approach but needs to be realistically and flexibly applied. Directing Class 4 to town centres/district centres would create uncertainty for employment land areas. A change in wording was needed to promote town centres as the “preferred” location. Site specific comments were raised in relation to the Albert Street District Centre and a desire to explore opportunities for the expansion of the district centre and retail frontage area.

## **Main Issue 7: Uses within the District Centres Retail Frontages**

13 responses were received in relation to Main Issue 7.

11 of the responses were in support for the preferred option which sought to review the extent of retail frontages and consideration of more non-retail uses within District Centres. It was considered that many shop frontages were outdated and did not meet the requirements of shoppers or attract new investment. A review of the extent of the retail frontages was supported. Permission to convert to residential was proposed. Site specific comments were received in relation to Albert Street as it was considered that there was an opportunity to expand the retail frontage and reduce the threat of out of centre retail developments.

2 responses were received in relation to alternative option 1 which was to retain District Centres as designated within LDP1 and no change to Policy 21. Comments were received specifically in relation to Broughty Ferry District Centre. It was considered that the preferred option would risk dead frontages within the area and was more appropriate for District Centres that had persistently vacant retail premises.

## **Main Issue 8: Major Out of Centre Retailing**

17 responses were received in relation to Main Issue 8.

12 responses indicated support for the preferred option which sought to maintain the current policy approach with no new sites over and above the proposed Bus Depot at Gallagher Retail Park for retail warehousing in bulky household goods. Whilst supportive of the preferred option various comments were received in relation to this option. There was conflict between responses wishing to see the removal of the expansion of Gallagher Retail Park and those in support of its expansion. Those who wished to see it removed sought to protect the City Centre and consolidate it with the extension to the Overgate shopping centre. Support for the expansion of Gallagher Park in to the Bus Depot also wished to see an expansion of the range of uses that would be allowed within the retail park. It was considered that this expansion provided an opportunity for convenience as well as bulky shopping provision.

It was also considered that in light of the findings of the retail study there was scope for small/medium food stores to be referenced within the proposed plan to provide new local shopping provision. The importance of location in relation to developments being able to be accessed by a variety of travel modes reducing dependence on the private car was also raised.

4 responses supported alternative option 1 which sought to designate new out of centre retail locations or extensions to existing retail locations for additional convenience or comparison floorspace. General comments were received regarding a lack of a retail park within the City with unrestricted open planning consent. It was considered that the plan should be more explicit about where spare capacity for retail would be accommodated reflecting the retail study. It was also felt that some rewording was needed to reflect the part that commercial centres play in the network of centres when applying the sequential approach. Site specific comments were received in relation to a number of sites which included:

- The Gas Holder Site and a suggestion for an allocation for retail;
- Kingsway East Retail Park and the need for physical improvement to the quality and appearance to attract inward investment;
- Land to rear of B&Q, Kings Cross Road, was considered as an opportunity to allocate for bulky retail; and
- Land to the east of Myrekirk Road was suggested as a Commercial Centre with the existing supermarket, planning permission for another supermarket as well as additional land within the area which could be used for food, drink and leisure.

## **Main Issue 9: Goods Range Restrictions**

16 responses were received in relation to Main Issue 9.

13 responses were in support of the preferred option which was to maintain the existing controls over the range of goods sold in retail parks and major food stores. Some concern was raised with regards to the findings of the retail study which indicated that there was potential for some additional retail floorspace within the City Centre and in particular concern regarding the impact an extension of the Overgate would have on the Wellgate. Further clarity is sought over the specific function of commercial centres. Site specific comments were raised in relation to good ranges restrictions at the Gas Holder Site and opportunity for retail warehouse allocation on the land to the rear of B&Q, Kings Cross Road.

3 responses were in support of alternative option 1 which sought to relax the controls on existing out of centre retail parks and a widening of the range of goods and retailers that could be accommodated. It was considered retail parks are unlikely to survive solely on “bulky goods” and sought to see other goods and uses being allowed in order to ensure vitality and viability. There is a need to embrace but appropriately control changes in retail. A general comment indicated concerns that tight controls on the range of goods sold may result in future voids, high vacancies and pressure to find alternative uses and occupiers.

## **Main Issue 10: Maximising the Benefits of Green Infrastructure**

33 responses were received in relation to Main Issue 10.

13 responses supported the preferred option which sought to re-emphasise the importance of green infrastructure and green networks and the introduction of a new policy requiring developers to provide on-site or off-site provision of new and/or enhanced green infrastructure and access to the green network. It was considered that encouragement should be given in the new policy to include reference to the qualities of successful places in terms of green infrastructure design. The new policy should provide suitable and greater recognition of blue networks within the green network. It was suggested that the current Planning Guidance on Dundee's Green Network should be adopted as Supplementary Guidance. Further consideration needs to be given on the type, form and scale of the development for which contributions are being sought to ensure reasonableness. Developer contributions should not be an onerous obstacle or a deterrent to investment and it was suggested that a detailed assessment of economic impact was required to consider contribution thresholds.

8 responses were received in support of alternative option 1 which proposed to maintain the current approach of supporting integration of green infrastructure and green networks across several policy areas. It was considered that the current approach works. Comments were raised in relation to the requirements of the current Planning Guidance on Green Networks and any new policy and concern that developers would be faced with a shopping list of requirements that would lead to a financial burden and subsequently constrain sites. Site specific concerns were raised in relation to Dundee Port and that there shouldn't be a requirement for green network pathways through the area that would prevent the continued operation of the Port.

3 responses were received that supported alternative option 2 which was the same as the preferred option but introduced a percentage contribution for green infrastructure for developments over £1m (similar to percent for public art policy). There was general support for this policy to achieve improvements and establish local links within the green network. Examples of a similar approach was cited and supported as an approach that would not be overly onerous.

9 responses indicated no preferred option. Site specific comments were raised in relation to South Auchray where it was considered there was an opportunity for a development site that would contribute to the green network through improving access to Clatto, Templeton and links to the Green Circular. There was some disparity in terms of access to green space throughout the city, with some participants at consultation workshops indicating a lack of green space in their area. General support was given to the need to improve access to assets such as the Dighty, as well as links to playparks, sports facilities and community facilities with improved quality green networks throughout the city. In order to encourage use it was raised that these networks and space needed to be well maintained, safe and well lit.

## **Main Issue 11: Supporting the Delivery of Heat Networks**

14 responses were received in relation to Main Issue 11.

6 responses were in support of the preferred option which required planning applications for significant development within opportunity areas highlighted on a 'Dundee Heat Network Opportunity Map' to consider feasibility to create or link into heat networks to include capacity for future links and submission of an Energy Statement. A link was highlighted between heat networks and green infrastructure with an opportunity to combine pipe routes with the creation of new footpaths. Concern was raised with regards to potential impact on air quality dependent on the source of the heat.

1 response was in support of alternative option 1 which required all significant development within opportunity areas to create or link into heat networks or include future capacity with evidence provided through an Energy Statement. Clarity has been sought for what is meant by "significant development". It was considered that the policy framework should require new development to be capable of connecting to the heat supply with space safeguarded for future pipework/pipe runs and energy centres. In addition it was considered that the LDP should identify sites for heat networks and district centres.

3 responses were in support of alternative option 2 which maintained the existing policy approach for locally generated energy. It was raised that householders could not be compelled to buy energy from any particular source and likewise there is no compulsion on developers to connect their development to a particular infrastructure. Concerns were raised with regards to an understanding of district heating and its viability. The request for an Energy Statement was considered an unnecessary burden on developers. It was considered that ongoing improved energy efficiency of homes was being achieved through building regulations. In terms of suitability it was proposed that a network would be more appropriate in urban areas, with suburban and rural areas efficiencies being met on an individual home basis.

3 responses indicated no preferred option. Scottish Water highlighted work currently being done on 'Heat from Sewage' and would welcome engagement on opportunities within Dundee. General comments were raised in relation to the use of district heating and its suitability to private sector housing and were considered more appropriate for RSL and Council stock. In contrast comments were received which didn't feel the policy went far enough and needed to promote retrofitting on to existing housing stock and look at how the heat would be generated e.g. anaerobic digestion plant.

## **Main Issue 12: Safeguarding of Waste Management Installations**

10 responses were received in relation to Main Issue 12.

6 responses supported the preferred option as set out in the Main issues Report which sought to safeguard existing waste management installations from redevelopment and ensure allocation of land on adjacent sites does not compromise waste handling operations. There was general support for the proposed option with some proposed changes to ensure the facilitation of growth in sustainable resource management including reference to site management plans.

2 responses supported alternative option 1 which was as per the preferred option plus the allocation of sites for new or expanded waste management installations. It was considered that the preferred option did not allow for the identification and allocation of sites for new or expanded waste management facilities and therefore to meet SPP and TAYplan 2 alternative option 1 was more appropriate. In addition it was raised that LDP2 provided an opportunity to identify waste as a resource and facilitate the reuse of materials/recycling.

1 response supported alternative option 2 which sought to maintain the existing policy approach. Site specific comments were received in relation to the Port of Dundee and the waste management activities specific to the area.

## 3. Spatial Strategy

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36 responses were received in relation to the spatial strategy.

12 responses were received in support of the spatial strategy with some comments relating to the need to demonstrate more clearly the strong cross-cutting relationship between all of the themes within the strategy.

24 responses were received that either disagreed with the spatial strategy or proposed amendments to it. Various comments were received in relation to the prioritisation of brownfield land for development and questions over effectiveness and deliverability of sites. It was considered that in order to provide a choice of sites and in particular effective land supply, a choice of sites was needed throughout the city and the release and allocation of greenfield land should be identified within the plan. It was raised that the spatial strategy should identify any potential impact on the strategic road network with a proportional appraisal approach. Site specific comments were received in relation to the Gas Holder Site and its allocation within the Wider Waterfront and an objection to the allocation of an inter-modal regional rail freight facility at Dundee Port.

## 4. Policy Framework

16 responses were received in relation to the existing LDP1 Policy Framework providing comments on current policies and in some instances proposed amendments or new policies.

The following provides a summary of these comments against the relevant policy:

**Policy 1:** Principal Economic Development Area – Support for the designation of Dundee Port as a Principal Economic Development Area but wish to see an amendment to the policy with regards to impact on the Natura site.

**Policy 7:** High Quality Design – It is considered that design should be appropriate to location and that the policy should be amended to reference the 6 qualities of a successful place.

**Policy 9, Appendix 3:** Design of New Housing – Flexibility is needed to allow for smaller house types e.g. 1 bedroom dwellings to provide affordable accommodation. Current wording with regards to number of bedrooms and internal floor area needs to be clarified. Need a more flexible approach within the District Centres. Considers there to be a need for discussion with regards to space standards in particular garden ground sizes, considers them to be too big particularly brownfield sites, quotes Fife standards as appropriate and that it should be based on type and size of house.

**Policy 12:** Development of Garden Ground for Housing – Clarity is needed regarding reference in policy to 'prevailing density' to ensure overcrowding does not take place in areas of low density.

**Policy 20:** City Centre Retail Frontage – Encouragement should be given to the retention and restoration of traditional shop frontage to maintain local character.

**Policy 25:** Gallagher Retail Park Extension – Amendments needed in light of development at the Stack. New policy should be adopted in relation to the redevelopment of The Gas Holder site for retail purposes.

**Policy 26:** Local Shopping Provision – Considers there to be a role for new local shopping provision and that the policy should be amended to allow slightly larger units than currently defined.

**Policy 29:** Low and Zero Carbon Technology in New Development – Policy needs a statement to encourage all forms of renewable energy generation/storage using low carbon sources.

**Policy 30:** Biomass Energy Generating Plant – Suggested policy amendments including; encouraging district heating schemes in all areas, reference to anaerobic energy generation and inclusion of a requirement for biomass energy applications to be accompanied by a sustainability statement.

**Policy 31:** Wind Turbines – Policy should include reference to biodiversity impacts.

**Policy 36:** Open Space – Recommendation that the modal policy wording of SPP should be used. Change terminology to “outdoor sports facilities”. Policy to be updated to be in line with TAYplan 2 to ensure adaptability and resilience to climate change.

**Policy 38:** Trees and Woodland – Support for the approach to safeguard/extend/enhance resources including community growing, allotments and core paths.

**Policy 39:** Major Waste Management Facilities – Support provision for new waste management facilities but seek modifications to refer to strategic policy principles of SPP in order to include encouragement for waste minimisation and establish waste hierarchy principles to support waste prevention, reuse, recycling, recovery and disposal.

**Policy 40:** Waste Management Requirements for Development – Propose amendments to policy to include opportunities for waste reduction and separation at source and the requirement for site waste management plans with major applications.

**Policy 41:** Flood Risk Management – Recommend policy amendment to include reference to the Flood Risk Management (Scotland) Act and Water Environment Water Services Act with a requirement for sustainable flood risk management as well as proposed amendments to the criteria in the current LDP policy.

**Policy 42:** Sustainable Drainage Systems – Policy to include a requirement for maintenance access buffer strips.

**Appendix 2:** Housing Sites – SEPA proposed amendments in relation to the requirement for Flood Risk Assessments and impact on site layout. Renewable Heat and Energy (Heat Networks and District Heating) - propose new policy to enable delivery of adequate heat networks and district heating opportunities.

Unnecessary Engineering Works – propose new policy to promote presumption against unnecessary engineering works.

## 5. Other Issues

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24 responses either through written representation or through one of the workshops raised issues which were not specific to any of the issues identified within the Main Issues Report or the Local Development Plan Policies. In some instances the issues were area or site specific and were shared with Community Planning Partners to be considered as part of the Local Community Plan Review process. The relevant proformas set out all the issues raised and provides a response to these issues in full.

The following provides a general summary of issues raised through written submissions:

- Sewage capacity and drainage in Broughty Ferry
- Forward investment in infrastructure needed for future development in East – reflecting work done for Western Gateway
- New policy to protect and support community and cultural facilities
- Community growing, allotments and core paths to be promoted through green networks
- SEPA identified sites with potential to protect/improve the water environment
- Policies not to be over prescriptive
- Multiple developer requirements may affect viability
- Planning guidance to consider infrastructure requirements, timescales etc.
- Planning Agreements should be set out in policy
- Policy requirements should be flexible and less rigid
- CO2 reductions can be achieved more effectively through materials and construction than low and zero carbon infrastructure
- Concern regarding sustainable travel and air quality
- Reference to Regional Transport Strategy

The following issues were raised by residents and through workshops using the Place Standard Tool:

- Access to public transport – bus schedules/prices
- Maintenance – roads, open space, communal areas
- Affordable housing
- Safety – pedestrian experience, street lighting
- Employment – job opportunities and work experience
- Socialisation – places to meet, community facilities
- ‘Gap’ sites being developed for housing
- Vacant shop units – need incentives
- Waste management – bins on streets
- Parking issues
- Social issues can affect physical environment
- Need to improve cycling experience
- Unattractive public realm
- Need to improve entrance to the City/City Gateway.

### Contact Details

Dundee City Council Planning Division  
For general advice and information, telephone 01382 433105 or  
email [development.management@dundeecity.gov.uk](mailto:development.management@dundeecity.gov.uk)

Website: <http://www.dundeecity.gov.uk/citydevelopment/planningdivision/>

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