

## Dundee Local Development Plan 2: Main Issues Report Consultation 2016

### Main Issues Report Response Form 2016

#### Important Information: Please Read

Comments are sought via the online response form or in writing using this printable (Word) response form.

Please note that in order for comments to be considered as valid you must include your contact details. We will use these details to confirm receipt of comments and to seek clarification or request further information. Anonymous comments or comments which do not directly relate to the Main Issues Report will not be considered as part of the consultation process.

Comments made on this consultation may be made public, which may include identifying details such as your name or organisation. Should you have any concerns regarding the holding of such information please contact [localdevplan@dundeecity.gov.uk](mailto:localdevplan@dundeecity.gov.uk)

Your comments are sought on the proposed spatial strategy and each of the identified main issues. Please indicate whether you agree with the Council's preferred option or one of the alternative options. Comments are also sought on the planning policies and proposals in the Local Development Plan 2014 (LDP1) any other land use planning issues.

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Essential supporting documents such as maps or images may be submitted with this response form and sent to: [localdevplan@dundeecity.gov.uk](mailto:localdevplan@dundeecity.gov.uk). All supporting documents should be submitted in a Word or standard image format. Please do not submit response forms in a PDF format.

Please indicate whether you will be submitting supporting documents.

Yes

No

## Proposed Spatial Strategy

It is considered important that new development and investment is targeted at the areas where it will deliver most benefit to the City and the region.

Major public and private investment continues to take place in Strategic Development Areas (SDAs) including the Dundee Wider Waterfront and Dundee Western Gateway. To ensure the benefit of this is not undermined, the proposed spatial strategy will continue to focus major new development over the plan period in the identified SDAs.

To meet the growing demand for new housing in Dundee, the proposed spatial strategy will continue to prioritise the development of brownfield land throughout the City as well as the greenfield locations.

**Do you agree with the proposed spatial strategy set out in the Main Issues Report?**

Please choose **only one** of the following:

Yes

No

Make a comment on your choice here:

In refining the preferred spatial strategy we consider that the Council should identify any potential impact to the strategic road network as a result of the preferred spatial strategy. We acknowledge the Council intend to prioritise the reuse of brownfield sites with a limited amount of greenfield land release which may limit the potential impact on the trunk road network in and around Dundee. However the need for a proportionate appraisal approach is important and we consider that they should engage with Transport Scotland to discuss this further.

(\*) This is a summary of the Main Issue and options - please read the Main Issues Report (pages 8-11) for full text (available at [www.dundee.gov.uk/localdevplan2](http://www.dundee.gov.uk/localdevplan2) )

## Supporting Business and Employment

### Main Issue 1: Safeguarding Employment Land

This main issue considers whether to continue to safeguard the majority of the existing employment land allocations for future employment uses, and in particular to provide for a broader energy sector. (\*)

Please choose **only one** of the following:

**Preferred Option** - It is proposed that no new allocations for employment land be made in the Local Development Plan. The existing allocations within the Principal, Specialist and General Employment Areas will be retained and safeguarded for future employment uses and in particular to provide for a broader energy sector.

Alternative Option 1 - Protect the land within the Strategic Development Areas identified in the Proposed Strategic Development Plan for employment uses but reduce the level of allocations in other Principal and General Economic Development Areas.

Alternative Option 2 - Maintain all the existing Principal and General Economic Development Areas allocations and identify further locations that could accommodate development associated with the renewables sector and a broader energy sector.

Make a comment on your choice here:

We are supportive of the preferred approach. We recognise that the proposal for no new allocations is based on the latest Employment Land Audit which indicates that there is well in excess of the five years effective land supply. We support the reasoning behind the desire to resist pressure for other uses such as housing and retail and in particular the desire to provide for a broader energy sector.

We are content that employment land identified through NRIP is retained in the preferred option.

(\*) This is a summary of the Main Issue and options - please read the Main Issues Report (pages 16-18) for full text (available at [www.dundee.gov.uk/localdevplan2](http://www.dundee.gov.uk/localdevplan2) )

## Main Issue 2: Blackness General Economic Development Area

This main issue considers what policy approach can regenerate the Blackness General Economic Development Area and bring vacant and derelict land and buildings back into productive use. (\*)

Please choose **only one** of the following:

**Preferred Option** - To adopt a more flexible policy designation and prepare a physical and economic regeneration masterplan that promotes the opportunities to develop Blackness as a location for new employment and other complementary uses that would improve the vibrancy and attractiveness of the area.

Alternative Option 1 - To maintain the current policy designation, restricting uses to Class 4 (business), 5 (general industry) and 6 (storage or distribution) only.

Alternative Option 2 - Remove the policy designation entirely and allow any uses to locate here, subject to usual controls over 'bad neighbour' developments.

Make a comment on your choice here:

We are supportive of the preferred approach. The approach accords with paragraph 103 of Scottish Planning Policy (SPP) which states that where business sites are underused reallocation to enable a wider range of viable business or alternative uses should be considered. In applying this approach paragraph 103 also states that careful account of potential impacts on existing businesses on the site should be taken. We would urge this approach at Blackness. In taking this issue forward it would be useful to provide clarity on the sort of additional uses considered appropriate for the site. We note the reference to complimentary uses and seek clarity in relation to these.

We note the reference on page 14 of the MIR to the requirements of SPP to encourage opportunities for home-working, live-work units, micro-businesses and community hubs; and for the Plan to be informed by the Tourism Development Framework for Scotland in order to maximise the sustainable growth of regional and local visitor economies.

We are supportive of this recognition but are not clear what the Council's intended approach to homeworking units will be. No existing development plan policy exists promoting homeworking which suggests the need for new policy in the proposed plan. We would be supportive of this and the provision of clarity on the approach the Council wish to take.

In terms of the tourism development framework, paragraph 100 of SPP states that strategic development plans should identify and safeguard any nationally or regionally important locations for tourism or recreation development. While SPP refers to strategic development plans, it would be useful to understand if there was anything identified in TAYPlan that would benefit from designation or policy in the local development plan – i.e. are there any nationally or regionally important locations for tourism or recreation development that should be identified and safeguarded? Provision in the local development plan is supported by paragraph

105 of SPP which states that planning authorities should consider the potential to promote opportunities for tourism and recreation facilities in their development plans. We note the existing development plan policy on tourism which relates to support for proposals coming forward. We are supportive of this but consider additional policy may be needed to identify, protect and promote important tourism development sites.

Paragraph 96 of SPP states that development plans should support opportunities for integrating efficient energy and waste innovations within business environments. There does not appear to be existing development plan policy on this and it is not covered in the MIR. Consideration of such provision should be given in taking the plan forward.

We also suggest that greater consideration of Dundee Port Enterprise Area is needed in the plan. As stated Dundee port is a low carbon/renewables enterprise area with aspirations as a European hub for offshore renewables as a major turbine and tower manufacturing facility. It would be useful to know how the enterprise area is progressing in this regard and whether there is anything specific needed in the development plan to support the enterprise area in meeting these aspirations, e.g. additional infrastructure (please see comments below in relation to transport infrastructure).

(\* This is a summary of the Main Issue and options - please read the Main Issues Report (pages 19-21) for full text (available at [www.dundee.gov.uk/localdevplan2](http://www.dundee.gov.uk/localdevplan2) ).

## Enabling Delivery of New Homes

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

This main issue considers how to deliver the land necessary to meet the housing needs required by the Strategic Development Plan and encourage a range and choice of housing development across the City. (\*)

Please choose **only one** of the following: **No preferred option**

Preferred Option - Continue with the current brownfield led approach and allocate the greenfield land at Linlathen and Baldragon that is currently allocated for release in 2020. In the second five year period of the Plan allow a managed release of greenfield land to the east and west of the City to support the growth of Dundee and to provide flexibility and choice.

Alternative Option 1 - Continue with the current brownfield led approach and allocate the greenfield land at Linlathen and Baldragon that is currently allocated for release in 2020. In the second five year period of the Plan allow a managed release of greenfield land to the west of the City only to support the growth of Dundee and to provide flexibility and choice.

Alternative Option 2 - Continue with the current brownfield led approach and allocate the greenfield land at Linlathen and Baldragon that is currently allocated for release in 2020. In the second five year period of the Plan allow a managed release of greenfield land to the east of the City only to support the growth of Dundee and to provide flexibility and choice.

Alternative Option 3 - Continue with the current brownfield led approach and allocate the greenfield land at Linlathen and Baldragon that is currently allocated for release in 2020 without further release of greenfield land across the City.

Make a comment on your choice here: **No preferred option**

#### Housing Land Requirement & Proposed SDP2

We note that Main Issue 3 refers to the Dundee City housing supply target and housing land requirement set out in the in the Proposed Strategic Development Plan (SDP2). To address the requirements of Policy 4 (E) of the Proposed SDP2 you intend to include an additional 20% to the SDP housing supply target (528 units). This results in a housing land requirement of 576 units per annum (5,760 units for the 10 year period of 2018-2028).

It would be helpful if the Proposed LDP provided background information and justification of why this figure (576 units per annum) has been chosen.

With regards to using figures from the Proposed SDP2, you will be aware that LDPs are required by legislation to be consistent with the SDP that is in place at the time which the LDP is adopted. We note that your LDP is scheduled to be adopted after SDP2 is approved.

When considering how to present housing figures in your Proposed LDP you may wish to refer to the recently published [Draft Planning Delivery Advice on Housing](#)

[and Infrastructure](#) which includes advice on this matter.

### Affordable Housing

The Main Issues Report lacked detail of how much affordable housing will be required in the Proposed LDP. We note that Policy 4 of the Proposed SDP2 highlights that LDPs should include provision of an appropriate level of affordable housing defined on local needs. This is set at 25% for the whole Tayplan area in the Proposed SDP2, which notes that this may vary between housing market areas and local authorities.

The Proposed LDP should therefore clearly set out the amount of affordable housing that is programmed to be delivered in the period 2018-2028. For example, the annual and total Housing Land Requirement should be separated into market housing and affordable housing. A clear explanation should be provided to explain the background for the chosen figures.

### 5 Year Effective Land Supply

The Proposed SDP2 requires that a minimum of 5 years effective land supply should be ensured at all times. We note the MIR highlights that Policy 8 'Housing Land Release' of your adopted LDP, may require to be replaced or significantly updated. When updating this policy you may wish to consider the [Draft Planning Delivery Advice on Housing and Infrastructure](#) which provides advice on this matter. In particular paragraph 26 states that "*Planning authorities may wish to consider including a 'flexibility policy' in development plans to set out how individual proposals will be considered where a shortfall in the 5 year supply of effective housing land supply emerges – as evidenced by the Housing Land Audit. Such a policy can provide criteria for considering proposals for housing on land which is not allocated in the development plan. It may also include support for sites that are identified for the longer term but which could be delivered earlier and address infrastructure constraints*".

### Transport Scotland – Site Specific Comments

With regard to LDP2 MIR site assessment information, the Scottish Government can offer the following site specific comments around transport issues, which have been provided by Transport Scotland:

In relation to the sites identified as MIR 75, 76, 77, 86, 90 and 99 – we consider that the cumulative impact of development on the A90(T) Swallow roundabout requires to be determined. Although we note that the Council has agreed mitigation measures at Swallow roundabout based on 800 residential units at the Western Gateway. Further development at this location which exceeds the agreed figure will require an appraisal of the potential impact on the trunk road network and, if required, the identification of further suitable mitigation. You should discuss the potential access strategy for site MIR 99 with Transport Scotland.

With regard to site MIR 83, it is considered a Transport Appraisal will be required

which examines any potential impact to the A90(T)/A923 (Coupar Angus Road) grade separated junction.

For the following sites, MIR 74, 79, 80, 81, 82, 87, 91 and 98, a Transport Appraisal considering the cumulative impact on the A972(T)/A92 Greendykes roundabout will be required. There is the potential for the circa 1,500 units and employment uses identified to adversely impact the safe and efficient operation of the trunk road network depending on traffic routing and dispersal. The potential access strategy for MIR sites 80 and 91 should be discussed with Transport Scotland.

(\*) This is a summary of the Main Issue and options - please read the Main Issues Report (pages 25-29) for full text (available at [www.dundee.gov.uk/localdevplan2](http://www.dundee.gov.uk/localdevplan2) ).



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

This main issue considers what policy approach can successfully increase housing density within Dundee's District Centres. (\*)

Please choose **only one** of the following:

**Preferred Option** - To apply the City Centre Appendix 3 Design of New Housing Standards to planning applications for new build housing and change of use to housing at sites that are within or immediately adjacent to District Centre boundaries, and allow some flexibility to enable innovative approaches to the type and form of housing development.

Alternative Option 1 - To apply the City Centre Appendix 3 Design of New Housing Standards to planning applications for the change of use to housing at sites that are within or immediately adjacent to District Centre boundaries.

Alternative Option 2 - Continue with the current Appendix 3 Design of New Housing Standards based on the existing area based approach and include text in the LDP to encourage higher density developments in and adjacent to the District Centres.

Make a comment on your choice here:

The National Review of Town Centres External Advisory Group Report (the Town Centres Review) identified town centre living as one its themes. It highlights: *“Footfall is key to achieving thriving, successful town centres. The best footfall is the residential kind, for people who live in a town centre will not only use its shops and institutions but will care for its safety and security in the evenings and at night.”*

The Scottish Government's Town Centre Action Plan includes Town Centre Living as a key strand which states the Scottish Government endorses the idea of encouraging more people to live in town centres. As set out in the Town Centre Toolkit *“More housing in town centres supports local businesses and makes town centres more vibrant.”* SPP sets out national policy direction that the planning system should consider opportunities for promoting residential use within town centres where this fits with local need and demand. And similarly through the Scottish Government's Local Housing Strategy Guidance, we are seeking to encourage local authorities to fully consider the role that town centres can play as residential communities.

We therefore welcome the attention that the Council has paid to town centre living and treating it as a main issue. It is clear that the Council is taking the drive for promoting town centre living opportunities seriously and looking at different options to maximise the potential for this and support thriving, district centres.

The Scottish Government would support the Council with its preferred option, in terms of increasing density to support and increase footfall within the district centres.

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

This main issue considers what policy approach can be adopted that will meet the housing needs of our growing older population. (\*)

Please choose **only one** of the following: **No preferred option**

Preferred Option - Amend Policy 9 to positively encourage a wider range of housing types and configurations within mainstream housing, which meet the needs of the elderly and are adaptable for specific needs. Include the obligation for a Design and Access Statement within Policy 9, which requires developers to justify their approach to the provision of homes for the elderly and adaptability for specific needs. Provide Supplementary Guidance which demonstrates positive examples of alternative housing types. Maintain Policy 13 to deal with sheltered accommodation housing proposals.

Alternative Option 1 - Amend Policy 9 to positively encourage a wider range of housing types and configurations within mainstream housing, which meet the needs of the elderly and are adaptable for specific needs. Expand the Appendix 3 Design of New Housing standards to require a prescribed number of units for the elderly and specific needs within developments. Maintain Policy 13 to deal with sheltered accommodation housing proposals.

Alternative Option 2 - Maintain Policy 9 and 13 while relying on market demands to encourage mainstream housing developers to meet the housing needs of the elderly and those with specific needs.

Make a comment on your choice here: **No preferred option**

We welcome the consideration given in Main Issue 5 of the Main Issues Report to meeting the housing needs of older people. It was not clear, however, what the additional "specific needs" referred to in this section covers. This should be clarified and addressed in the Proposed LDP.

Paragraphs 132-134 of SPP provide information on such needs and this includes Gypsy/Travellers and Travelling Showpeople. If there is a need identified, SPP sets out how this should be addressed in development plans.

(\*) This is a summary of the Main Issue and options - please read the Main Issues Report (pages 32-34) for full text (available at [www.dundee.gov.uk/localdevplan2](http://www.dundee.gov.uk/localdevplan2) ).

## Supporting our City Centre and District Centres

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

This main issue considers the policy approach capable of delivering the Scottish Government's objective for the town centre first principle. (\*)

Please choose **only one** of the following:

**Preferred Option** - Adopt a sequential town centre first approach to assess proposals for uses which generate significant footfall, including retail and commercial leisure uses, offices, community and cultural facilities and, where appropriate, other public buildings such as libraries, and education and healthcare facilities.

Alternative Option 1 - Maintain the current policy approach which directs new and expanded tourism, leisure, retail and Class 2 (Financial, Professional and other services) – but not Class 4 (Business) – developments to the City Centre or District Centre via a sequential approach.

Make a comment on your choice here:

The Town Centre First Principle jointly developed by Scottish Government and COSLA encourages the public sector to continue to invest in town centres and help communities thrive. The principle is about adopting an approach to decisions that considers the vibrancy of town centres as a starting point. It asks that the health of town centres features in decision making processes.

Paragraph 60 of SPP's Policy Principles is that "*the planning system should apply a town centre first policy when planning for uses which attract significant numbers of people, including retail and commercial leisure, offices, community and cultural facilities*". The SPP widens out the previous sequential approach for town centres first to apply it not just to retail and commercial leisure but also to offices, community and cultural facilities and uses which attract significant numbers of people.

We support the Preferred Option to expand the sequential town centre first approach to the full set of uses set out in SPP.

(\*) This is a summary of the Main Issue and options - please read the Main Issues Report (pages 37-39) for full text (available at [www.dundee.gov.uk/localdevplan2](http://www.dundee.gov.uk/localdevplan2) ).

## Main Issue 7: Uses within the District Centre Retail Frontages

This main issue considers whether there should be a relaxation of the use classes permitted across all the District Centres, to consider allowing more non-retail uses to occupy former retail premises within the retail frontages or reducing the extent of retail frontages. (\*)

Please choose **only one** of the following:

**Preferred Option** - Review the extent of the retail frontages within the District Centres to consider allowing more non-retail uses and update Policy 21 accordingly.

Alternative Option 1 - To leave the retail frontages within the District Centres as they are designated in the LDP1 and make no change to LDP 1 Policy 21.

Make a comment on your choice here:

SPP's approach is that planning for town centres should be flexible and proactive, enabling a wide range of uses which bring people into town centres, including town centre living. One of SPP's Policy Principles (paragraph 60) is that the planning system should encourage a mix of uses in town centres to support their vibrancy, vitality and viability throughout the day and into the evening.

We support the Preferred Option to support a mix of uses within the district centres' frontages to support vibrancy, vitality and viability.

(\*) This is a summary of the Main Issue and options - please read the Main Issues Report (pages 40-43) for full text (available at [www.dundee.gov.uk/localdevplan2](http://www.dundee.gov.uk/localdevplan2) ).

## Main Issue 8: Major Out of Centre Retailing

This main issue considers what locations should be considered for new convenience or comparison retail development. (\*)

Please choose **only one** of the following:

**Preferred Option** - To maintain the current policy approach to out of centre retail floorspace with no new sites identified for either convenience or comparison floorspace over and above that proposed at the Bus Depot as an extension to Gallagher Retail Park for retail warehousing in bulky household goods.

Alternative Option 1 - Designate new out of centre retail locations, or extensions to existing retail locations for additional convenience or comparison goods floorspace.

Make a comment on your choice here:

We support the Preferred Option, which supports the Town Centres First approach, rather than designating new out-of-centre retail locations.

(\*) This is a summary of the Main Issue and options - please read the Main Issues Report (pages 44-47) for full text (available at [www.dundee.gov.uk/localdevplan2](http://www.dundee.gov.uk/localdevplan2) ).

## Main Issue 9: Goods Range Restrictions

This main issue considers whether the current range of goods restrictions should be maintained.

Please choose **only one** of the following:

**Preferred Option** - Maintain the existing controls over the range of goods sold from the Retail Parks and major foodstores.

Alternative Option 1 - Relax the controls on the existing out of centre retail parks to allow them to widen the range of goods and retailers that could be accommodated.

Make a comment on your choice here:

Paragraph 63 of SPP sets out that where necessary to protect the role of town centres, plans should specify the function of commercial centres, for example where retail activity may be restricted to the sale of bulky goods.

The Council has set out that it has a recent Retail Study which recommends applying restrictions on out of centre developments to maintain the strength and viability of the established centres. This provides an evidence base for the Preferred Option, of maintaining the existing controls over the range of goods sold from retail parks and major foodstores, as being necessary to protect the role of town centres - as such we support the preferred option.

(\*) This is a summary of the Main Issue and options - please read the Main Issues Report (pages 44-48) for full text (available at [www.dundee.gov.uk/localdevplan2](http://www.dundee.gov.uk/localdevplan2) ).

## Enhancing the Natural and Built Environment

### Main Issue 10 – Maximising the benefits of Green Infrastructure

This main issue considers introducing a requirement for developments to contribute towards the enhancement of the Dundee Green Network. (\*)

Please choose **only one** of the following:

**Preferred Option** - To re-emphasise the importance of green infrastructure and green networks across LDP2 policies and introduce 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 as identified in the non-statutory planning guidance on the Dundee Green Network and the LDP2 Action Programme.

Alternative Option 1 - To maintain the current approach of supporting the integration of green infrastructure and green networks across several Local Development Plan policy areas.

Alternative Option 2 - As per the preferred option but also introduce a percentage for green network enhancement for developments where construction costs are over £1M (as per LDP1 Policy 7 requirement for a percent for art). Developers must then use this funding to support key enhancement projects identified in Supplementary Guidance on Developer Contributions, non-statutory planning guidance on the Dundee Green Network and the LDP2 Action Programme.

Make a comment on your choice here:

The Scottish Government welcomes that green infrastructure has been identified as a main issue for this LDP, and that the Council is looking at policy changes to reflect this shift to enhancing green infrastructure. The MIR sets out a preferred approach to secure delivery of enhancements to the Dundee Green Network. We also welcome the intention to re-emphasise the importance of green infrastructure and green networks across the Proposed Plan's policies.

SPP sets out that development plans should seek to enhance existing and promote the creation on new green infrastructure, which may include retrofitting. The proposal to seek developer contributions to provide on, or off-site provision of new and/ or enhanced green infrastructure and access to the green network, in allowing the taking account of where off-site enhancements may offer best value and benefits to the green network fits with the approach set out in SPP in terms of design-led, context driven approaches.

The proposed link within the development plan to the Dundee Green Network planning guidance with its locational specific priorities and aspirational links should ensure that its placemaking approach to the delivery of green infrastructure can be realised and delivered. Through spatially showing the four identified green networks and for each of those parts of the city the new planned developments– it provides a good basis for seeking developer contributions towards the green network. This approach should help developers see their proposal's relationship to the green network and how a contribution whether on or off-site to enhancing the green

network would connect with and benefit their development.

We would encourage the Proposed Plan's green infrastructure policy to include reference to the qualities of successful places in terms of green infrastructure design. We therefore agree with the preferred approach as set out above and below and the support it will provide for the implementation of paragraph 273 of SPP. Paragraph 273 promotes a movement hierarchy which puts walking and cycling as the priority. The green network will help provide for this especially where it provides for links to locations that people want to walk and cycle to.

Related to this issue, paragraph 277 of SPP states that disused railway lines with a reasonable prospect of being reused as rail, tram, bus, rapid transit or active travel routes should be safeguarded in development plans. It is not clear if any such routes exist in Dundee but if they do the SPP policy approach should be applied as appropriate.

Paragraph 282 of SPP states that when preparing development plans, Planning Authorities should consider the need for improved and additional freight transfer facilities. Strategic freight sites should be safeguarded in development plans. In this respect we note from page 8 of the MIR the proposal for inter-modal regional rail freight facilities at Dundee Port. Paragraph 283 of SPP states that planning authorities and port operators should work together to address the planning and transport needs of ports and opportunities for rail access should be safeguarded in development plans. We would expect rail facilities at Dundee port to be safeguarded accordingly in the emerging development plan.

In addition, paragraph 5.38 of NPF3 states that ferry terminals provide a useful focal point for charging infrastructure. This is supported by paragraph 5.30 of NPF3 which supports provision of infrastructure to support greater use of low carbon fuel options, referring to electric vehicle charging points. Paragraph 289 of SPP supports this approach stating electric vehicle charging points should always be considered as part of any new development. In taking the plan forward provision should be made for electric vehicle infrastructure, at Dundee port and as appropriate across the development plan area. This may require a review of the current parking standards to include provision for electric vehicle parking.

Page 8 of the MIR also refers to proposed expanded services at Dundee airport. Paragraph 284 of SPP is relevant here stating planning authorities, airport operators and other stakeholders should work together to prepare airport masterplans and address other planning and transport issues relating to airports. Such an approach may be relevant to proposals for Dundee airport and any approach to masterplanning reflected in the development plan.

Paragraph 275 of SPP states that development plans should identify any required new transport infrastructure. The MIR and the existing LDP refer to a range of transport infrastructure that is to be developed. Plans should indicate how new infrastructure is to be delivered and phased, and how and by whom any developer contributions will be made. It will be important for this to be set out in the proposed



plan.

Paragraphs 279 and 287 of SPP refer to significant travel generating uses. If any such uses are proposed or anticipated in Dundee, development should proceed in accordance with the requirements of these paragraphs.

Paragraph 2.23 page 17 of the NPF3 sets out the key development issues for Dundee. One of these refers to the best approach to upgrading the A 90 through Dundee – this may require greater attention in the proposed plan.

(\* This is a summary of the Main Issue and options - please read the Main Issues Report (pages 53-54) for full text (available at [www.dundee.gov.uk/localdevplan2](http://www.dundee.gov.uk/localdevplan2) ).

## Main Issue 11 – Supporting the Delivery of Heat Networks

This main issue considers what policy approach will support the delivery of heat networks in Dundee. (\*)

Please choose **only one** of the following:

**Preferred Option** - To require planning applications for significant development within the opportunity areas highlighted on a 'Dundee Heat Network Opportunity Map' to consider the feasibility to create or link into heat networks or include capability to progress towards this at a future date, and to evidence this in an Energy Statement.

Alternative Option 1 - To require all significant development within the opportunity areas to create or link into heat networks or include capability to progress towards this at a future date, and to evidence this in an Energy Statement.

Alternative Option 2 - Maintain the existing LDP1 approach which supports proposals for locally generated energy including biomass, wind turbines and district heating schemes.

Make a comment on your choice here:

We are content that the preferred option complies with SPP. We note that further supplementary guidance may be produced.

We also note that Annex A identifies that a number of policies will be updated to take account of SPP and NPF3.

(\*) This is a summary of the Main Issue and options - please read the Main Issues Report (pages 55-57) for full text (available at [www.dundee.gov.uk/localdevplan2](http://www.dundee.gov.uk/localdevplan2) ).

## Main Issue 12: Safeguarding of Waste Management Installations

**This main issue considers measures to safeguard the existing waste management installations across the City and the provision of new or expanded installations. (\*)**

Please choose **only one** of the following:

**Preferred Option** - To safeguard existing waste management installations from redevelopment and ensure that the allocation of land on adjacent sites does not compromise waste handling operations.

Alternative Option 1 - As per the preferred option and allocate sites for new or expanded waste management installations.

Alternative Option 2 - Maintain the existing LDP1 approach and do not safeguard existing waste management installations.

Make a comment on your choice here:

Preferred Option is favoured, but with amendments - The preferred option safeguards existing waste management installations and this is supported by paragraph 184 of SPP. However, we note that the targets are not a cap and Local Authorities should generally facilitate growth in sustainable resource management, paragraph 181 of SPP refers, and the preferred option does not allow for this.

If new sites are to be allocated, we would point out that the waste management guidance recommends that potential sites and alternative are set out in the MIR itself to alert communities and the waste management industry ahead of the proposed plan.

We would not agree with alternative option 2, as it is contrary to paragraph 184 of SPP which states that Local Authorities should safeguard existing waste management installations.

We would support the proposed change to policy 40 to include reference to site management plans (appendix 1). This is encouraged by paragraph 187 of SPP.

The map-based approach taken in the MIR is positive and encouraged by the Scottish Government.

(\*) This is a summary of the Main Issue and options - please read the Main Issues Report (pages 58-60) for full text (available at [www.dundee.gov.uk/localdevplan2](http://www.dundee.gov.uk/localdevplan2) ).

## Other Comments

Comments are also sought on the planning policies and proposals in the Local Development Plan 2014 and any other land use planning issues

Please enter your comments here:

### Access and Core Paths

The Scottish Government supports the preferred approach which should ensure compliance with SPP in terms of its requirements in paragraph 228 on safeguarding access rights and core paths and encouraging improvements to the networks with investments in footpaths and cycle ways.

### Allotments and Community Growing Spaces

The Scottish Government supports the preferred approach which should ensure compliance with SPP in terms of its requirements in paragraph 227 on safeguarding existing allotment sites and supporting opportunities for community growing.

### Flooding

We agree with the approach advocated by SEPA that Dundee City Council operates a presumption against unnecessary engineering works and that this is covered either by policy wording or within Supplementary Guidance.

At present there is no specific reference to climate change within the flooding and drainage section of the local development plan. The Council should note also that Para 254 in SPP outlines that Climate Change will increase the risk of flooding in some parts of the country. Given the extensive coastline in the city and the potential risk of flooding it would be prudent for the council to explore any potential implications climate change could have on the city and to start factoring in climate change mitigation to those areas at highest risk of flooding.

Para 264 of SPP states that it is not possible to plan for development solely according to the calculated probability of flooding. However in applying the risk framework the effects of climate change including an allowance for "freeboard" should also be taken into account. The glossary defines freeboard as - a height added to the predicted level of a flood to take account of the height of waves or turbulence and uncertainty in estimating the probability of flooding.

Whilst SPP doesn't stipulate the 20% recommended by SEPA for Freeboard allowance, it does seem to indicate that provision for climate change would be additional to the 1 in 200 scenario. It will be for the council to consider what might be appropriate for the city area to address this.

Additionally we agree that the Council should consider any land use implications from the Strategic Flood Risk Management Strategy and any subsequent local flood strategies relevant to the area. <http://apps.sepa.org.uk/FRMStrategies/tay-estuary-montrose-basin.html>

### Minerals

SPP paragraph 237 sets out that Local Development Plans should safeguard all

workable mineral resources which are of economic or conservation value and ensure that these are not sterilised by other development. Paragraph 238 seeks the maintenance of a landbank of permitted reserves for construction aggregates of at least 10 years at all times in all market areas through the identification of areas of search.

The Proposed Plan should therefore set out the circumstances that apply to Dundee in this context, having regard to Policy 9 of the Proposed SDP.

## Other information

Information on this page is extremely helpful to us in monitoring the effectiveness of our publicity, these questions are optional

**Where did you hear about this consultation - please tick all that apply**

Dundee Courier

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**Other: Consulted by Council on 16 December 2016**

**Are you resident in Dundee?**

Please choose **only one** of the following:

Yes

**No**

**Do you work in Dundee?**

Please choose **only one** of the following:

Yes

**No**

**Please email your completed response form in a 'Word Document' format and any essential supporting documents to [localdevplan@dundeecity.gov.uk](mailto:localdevplan@dundeecity.gov.uk). Please do not submit response forms in a PDF format.**