

## DUNDEE CITY COUNCIL'S RESPONSE TO THE NATIONAL PLANNING FRAMEWORK FOR SCOTLAND 2-DISCUSSION DRAFT

The following sets out Dundee City Council's response to the discussion draft of the National Planning Framework for Scotland 2.

1. Dundee City Council welcomes the publication of the discussion draft of the second National Planning Framework (NPF2) for Scotland.
2. The Council is encouraged to see that NPF2 seeks to guide Scotland's spatial development to 2030 by setting out strategic development priorities to support the Scottish Government's central purpose of promoting sustainable economic growth.
3. It is recognised that NPF2 will provide the strategic spatial policy context for decisions by the Government and its agencies, complementing the statements of national planning policy set out in the Scottish Planning Policy (SPP) series.
4. It is noted that Planning Authorities are required to take the Framework into account in preparing development plans and that it will be a material consideration in determining planning applications.
5. The proposal by NPF2 to identify 'National Developments' in an attempt to provide an important signal of long-term infrastructure priorities that will contribute to Scotland's sustainable economic growth is welcomed.
6. The Council also welcomes NPF2's recognition that Dundee has a key role as a driver of economic activity and that it is essential it is well connected to Edinburgh and Glasgow, their wider regions and the rest of the world.
7. It is also encouraging to note that NPF2 acknowledges Dundee has made great strides in improving the quality of the city centre, enhancing cultural facilities and establishing new centres of expertise in key areas of the knowledge economy.
8. In particular it is extremely encouraging to note that NPF2 places particular importance on reducing the rail journey time to Edinburgh to under an hour in order to help attract more high value jobs to the city. A critical part of any improvement to journey times is the requirement for the major refurbishment of Dundee Station to provide a modern facility as a gateway into the City. This should be recognised within NPF2.
9. Under paragraph 300 reference is made to '*Liaison with the strategic development plan authorities for the Edinburgh and Aberdeen City Regions will be pursued with priority in moving forward the strategy. Discussions with the Strategic Development Plan Authority for the Dundee City Region will also be pursued.*' Reference is also made to the approach for the focus of engagement with Glasgow City Region. Whilst, it is understandable why the Glasgow City Region is treated differently it is unclear why Dundee City Region has been separated from Edinburgh and Aberdeen. In particular, it is of concern that while liaison with Edinburgh and Aberdeen will be pursued with priority discussions with Dundee will not. These statements need to be clarified and why Dundee City Region does not seem to be a priority. I would not be helpful if this is what is being suggested by the document.

10. It is considered that while NPF2 does recognise some of the main strategic issues facing Dundee there are other matters that require further comment.
11. It would appear that the list of National Developments is bias towards developments within the Edinburgh and Glasgow City Regions. It is considered that the list of National Developments should be wider to include other developments in the Dundee and Aberdeen City Regions that form part of a national approach to sustainable economic growth. The following developments within Dundee should be considered for inclusion as National Developments.
  - I. The Central Waterfront Project should be recognised as a National Development as it will make a significant contribution to Scotland's sustainable economic development. It is also the major development in terms underpinning the development of economy of the Dundee City Region.
  - II. The Port of Dundee is clearly strategically located within Scotland and its development should have an important role in the growth of the Scottish economy. As such the future development of the Port is significant and should be considered as of national importance.
  - III. Although at an early stage the Dundee Western by-pass needs to be identified in NPF2. This is an important project for both the future economic development of the City and to improve the connectivity on the main trunk road network serving the east of Scotland.