

## **1. What development will we need to address climate change?**

Climate change and our response through planning runs through all of the topics being considered as part of the NPF4 Call for Ideas.

Each council area is likely to have their own agenda for how they will respond to the climate emergency. In the case of Dundee this is through the Climate Action Plan 2019. There are key national issues for consideration which require further guidance and direction to guide how we can respond through planning.

### **Energy**

Planning provides an opportunity to enable the delivery of clean energy through development. However, clear national direction on the type of energy we should be promoting is required. There has been a move towards the use of Electric Vehicles (EV) within the City with charging hubs already provided in various areas and more planned. However, with growing interest in hydrogen (particularly for public transport) and recognising it as a potential option for household heating using the existing pipe network, investment in appropriate infrastructure needs to be clearly set out and prioritised to ensure we can respond to future demand.

Clarity in energy production as a nation also needs to be considered in the context of district heating. The current SPP promotes heat networks as a means to heat homes and whilst there has been some moves to seeing how this could be implemented e.g. LHEES pilots etc. delivery continues to be challenging. Significant investment and buy-in is needed (particularly in the private sector) to deliver heat networks. In addition, incentives are needed to enable households to request this type of heating for their homes in terms of demonstrating low energy costs and an easy change over to alternative, cleaner sources of energy. Planning is currently in a position to encourage and help future proof heat networks but very limited in its powers to demand this form of energy within a development without the corresponding investment and incentive.

### **Transport**

Connectivity is key in ensuring the sustainability of the places we create, providing opportunities for active travel, reducing the need for reliance on the private car and the subsequent positive impact this would have on climate change. The Waterfront regeneration project provides an exemplar approach to how this could be delivered with opportunities to live, work, visit, shop, play and access various modes of sustainable transport.

The challenge for the Scottish Government will be the balance between the need to build new road infrastructure and reducing private car travel. It is evident that moving forward the road network shall continue to play a significant part in the connectivity of the country. A holistic solution for the road network shall need to provide for the delivery of active travel and also utilise the advancement of technologies to provide cleaner ways to travel.

Dundee's Local Development Plan policies already aim to prioritise sustainable modes of transport over the private car, but further infrastructure is required to improve the existing transport network. The delivery of the Dundee Northern Relief Road, would allow the repurposing of the A90 Kingsway with a package of bus priority lanes, cycle lanes and pedestrian measures to reduce congestion and form part of a modern transportation network.

### **Waste**

Energy from waste potential has been recognised within the existing policy framework and should be continued moving forward. In particular its potential to contribute to local heat networks.

### **Resilience/Adaption**

What we build, how we build and where we build should ensure that we create places that are resilient and adaptable to climate change. Buildings should be energy efficient and optimise low and zero carbon technologies. Layouts of development should maximise on solar gain and be well connected to encourage active and sustainable forms of travel. Green spaces should be protected, created and optimised to creatively respond to issues such as flooding and drainage. They should also seek opportunities to benefit communities through community growing and leisure as well as benefiting the environment through tree planting and providing a means of carbon capture and offsetting carbon creation.

### **National developments**

(please see separate submissions for detailed information)

- Dundee Waterfront project demonstrates how developing sustainable places with live, work, play can respond to climate change, reducing the need to travel, access to facilities and services as well as access to open space for promote health and wellbeing. Dundee Port provides an accessible resource to facilitate growth and construction of renewable technologies.
- Michelin Scotland Innovation Parc provides an opportunity to explore innovation and creativity in products and services to promote energy efficiency and proactive response to climate change.
- Dundee Northern Relief Road - Development of a new northern relief road for the A90 trunk road. To separate strategic and local traffic in Dundee and improve connections between Aberdeen and the Central Belt. To introduce improvements to the existing A90 as it passes through Dundee for the benefit of walking, cycling and public transport.
- Scotland Green Network - The proposed National Development would provide an umbrella strategy extending to most of the east of Scotland linking similar networks which connect with the existing Green Networks at Dundee, Aberdeen and Central Scotland, as well as providing the basis for additional networks to be developed in a rational framework of connected and biodiverse green and blue spaces.

## **2. How can planning best support our quality of life, health and wellbeing in the future?**

### **Placemaking**

Placemaking and the creation of high quality places continues to be key in delivering new development as well as regenerating existing communities. How we design places can help respond to climate change to ensure the creation of more resilient, energy efficient places and spaces. The places we create can also positively impact on the health and wellbeing of our communities through access to high quality homes, areas of open space, connections to employment, retail and leisure and creation of social space. How we design future places

should be resilient not only to a changing environment but also across generations ensuring age-friending places with mixed uses reducing the need to travel. There is an opportunity through NPF4 to encourage a place-based approach, applying the Place Principle to how and where we plan for people, place and work and the overarching response to the Climate Emergency.

### **Adaptable and Resilient Housing**

Future housing needs to be able to respond to not only climate change but the changing nature of how people work and live. A move towards low and zero carbon living should continue to be encouraged through sustainable building materials, layout orientations and the use of energy technologies to provide heat and electricity to our homes. Nationally further guidance and incentive is needed for the private sector (both owner occupied and private rent) particularly in terms of retrofitting existing homes to meet the standards required to provide more energy efficient homes. Council housing and social housing providers are leading the way in terms of both new build standards as well as implementing programmes to make their existing building stock energy efficient. More energy efficient homes that have lower costs to run can also seek to help address issues such as fuel poverty and inequality within our communities.

Homes need to be adaptable to the changing needs of their residents. Whilst this has been an aim within planning for some time, what is being delivered is not always what could be considered as lifetime homes. Alignment between the aspirations of providing homes for life and the standards set out through Building Regulations mean particularly in the private sector, what is built meets a minimum but does not consider what the likely future needs may be for those living there. This is linked also to housing choice – the ability for people to upsize or downsize as life circumstances change within the community in which they live as well as opportunities for co-housing and self-build. More flexibility and opportunity should be enabled for people to stay in their existing communities (if they choose) where there are existing social connections to maintain their health and wellbeing and to ensure that social isolation is not exuberated by where homes are located.

The type of homes built is also linked to where it is provided in terms of the needs of communities. For example with regards to particular needs housing and the provision of health and social care within the community we need to provide homes within localities where there is the support and services that are needed to provide care. Whilst community and spatial planning have made steps to align through the SPP this could be taken further in terms of locality planning and the application of the Place Principle. Where we locate new housing whether social or private should be in places where communities can thrive, residents have access to services and are well connected, in other words seeking to create healthy sustainable lifetime communities.

Two areas of research have been identified for housing where there is considered to be a knowledge gap:

- One is in relation to obtaining a clearer understanding of the housing needs of private house buyers – are the homes being provided what people actually want or is it all that is on offer in the area they want to live? Is it fit for purpose? Can it be adapted as the life of the resident changes?

Again in relation to the private sector there is currently no robust evidence in terms of wheelchair housing needs. Councils currently through their Health and Social Care Partnerships have a clear understanding of the numbers (in which demand far outstrips supply) of properties required and the sizes needed but there is no information privately what is required and

therefore whilst it would be beneficial to set a target for wheelchair housing in the private sector this should be provided on evidence of need and the corresponding strengthening of the Building Standard requirements to promote a different more adaptable approach to housing delivery and choice.

### **3. What does planning need to do to enable development & investment in our economy to benefit everyone?**

#### **Adaptable and well-connected**

The changing nature in which people work including a move towards home working, hot-desking and co-location offices etc will impact not only on the type of office accommodation that is likely to be required in the future but the adaptability of our homes to allow flexibility to access employment. Connectivity is key both in terms of travel as well as digital. Investment in digital connectivity will be key to unlocking opportunities both within City centres and employment/industrial areas and attracting and retaining investment.

Connectivity in terms of transport is a means by which we can enable economic growth and mobility within areas of deprivation. Whilst we may not be able to provide job opportunities **within** every community we should ensure that there is **access to** job opportunities within the wider area through a well-connected public transport and active travel network in addition to the digital connectivity to allow flexibility in how people work and access employment.

Our town/city centres provide a key opportunity to unlock potential to provide attractive working spaces for small and emerging business with access to transport and facilities that are well connected and enable business growth. Further national incentives are needed to unlock our city centres and enable flexibility in terms of how our city centres are used to respond to the changing retail and working habits of the population.

Consideration should be given to updating the Use Classes Order to bring it more up to date with modern business practices and the changing nature of City/Town Centres and business parks parks/technology parks/economic growth areas. This would allow more flexibility for the types of uses that are suitable and acceptable within these locations and ensure more control over what is now considered appropriate.

Much of the focus to date has been in relation to larger business and industry but in Cities such as Dundee a large proportion of business is small and medium sized companies. Many of these businesses cannot afford to build their own premises and rely on adequate provision in accessible locations. This provision should be considered as part of the Business Land Audit through monitoring building availability rather than just land availability. One of key issues for small businesses is in relation to rates, therefore consideration should be given to the provision of “affordable” business premises (similar to affordable housing) to encourage start-ups and business growth with power given to Council’s to promote and deliver this.

In addition to digital connection where business growth is promoted, social connection should be enabled through how we create spaces to promote collaboration and socialisation to the benefit of the health and wellbeing of the workforce. This approach will be a key element in the delivery of the Waterfront regeneration project.

Future investment opportunities in the context of Dundee are likely to be in relation to energy creation through renewables and decommissioning (Dundee Port) as well as emerging new

business models through the Michelin-Scotland Innovation Parc. Untapped potential such as energy drawn from the River Tay or through the creation of energy from solar (given south facing orientation) should be explored and enabled.

Continued investment and delivery of the Waterfront regeneration project should continue to be of national importance given the success of the V&A and the various tourism and visitor accolades accredited to Dundee as a result of the changing landscape of the City.

#### **4. How can planning improve, protect and strengthen the special character of our places?**

Vacant and derelict land provides an opportunity to not only unlock development potential in sustainable locations but to respond to climate change through the introduction of green infrastructure and potential energy generation. Building on the work by Scottish Land Commission there is an opportunity to categorise vacant and derelict land and therefore identify appropriate new uses.

The Scottish Government has previously recognised the importance of utilising brownfield redevelopment as a sustainable delivery mechanism. To emphasise the importance of the reuse of brownfield land this needs to be supported by a national direction and obligation on owners to re-use and re-purpose land for a suitable use and recognise the impact this land has on surrounding communities' health and wellbeing. This clear direction from the Scottish Government will allow Local Authorities to establish clear and robust policy to support the Government's regeneration objectives and feed into the delivery of sustainable developments.

The sustainable reuse of brownfield land is a key factor in the current economic climate as it can help to alleviate pressures on increased release of greenfield sites that at present have significant issues with the delivery and connectivity of infrastructure in terms of services and transportation.

How we use town centres continues to change and we need a robust framework to promote the re-use and repurposing of vacant units on both ground and upper floors within our town centres. To enhance economic activity the physical environment plays a key part in attracting people to live, work, shop and visit our city centres.

A key issue for the delivery of new green space and environmental enhancements is that there tends to be the capital available through various grants and funding streams but not the revenue to ensure their continued management and maintenance. With a push nationally for green infrastructure within the climate change agenda there needs to be the flexibility as well as the prioritisation of money available to ensure our existing green spaces as well as new spaces can continue to deliver high quality well managed and maintained spaces. With continuing pressure for Council budget cuts, maintenance of green space tends to be under increasing pressure to reduce expenditure which will continue to be a challenge if planning is encouraging and promoting more green space.

The green network is a vital contributor to address issues of climate change, flooding and drainage, physical regeneration, promoting active travel, health and wellbeing and social interaction. The national framework in addition to local open space strategies should set out the expectation to protect, promote and enhance our green networks. Again the issue of continued maintenance is an issue faced by many Local Authorities and more needs to be done to ensure these spaces deliver on their objective. Building on the success of the Central Scotland Green

Network this project should be rolled out at a national development (Scotland Green Network) to enable green networks, promoting reuse of vacant and derelict land, tree planting, flood defences as well as active travel routes.

The re-use and repurposing of our historic buildings where appropriate should be encouraged and utilised to deliver sustainable development which could help to address housing need and employment need. NPF provides an opportunity to set out national policy (building on HEPS) on the historic environment. Local policy would only then be required where there are significant local circumstances that require detailed direction.

## **5. What infrastructure do we need to plan and build to realise our long term aspirations?**

### **Transport**

A key element of ensuring we are able to promote and deliver sustainable and active travel options for communities is to ensure that adequate infrastructure is in place which makes this form of transport attractive, affordable and an easy alternative to the private car. Adequate investment in sustainable transport will ensure better air quality, carbon reduction as well as a positive contribution to the health and wellbeing of communities. As indicated previously clear direction and prioritisation of sustainable travel options should be set nationally.

To further promote active travel, cycling infrastructure should be promoted including cycle paths, secure storage and showers as well as adequate access to maintenance facilities. Nationally this could be promoted rolling out the Central Scotland Green Network across Scotland linking to and building on the successful implementation of the Central Green Network projects and therefore further elevating the importance of active travel as a viable and sustainable transport option.

Dundee has made some bold and exemplary moves in not only enabling but delivering EV infrastructure for public and private transport options. Investment in other renewable energy technologies such as hydrogen is being sought however clear direction is needed nationally on whether investment should be continued in EV or if there should be a move to hydrogen to ensure the appropriate infrastructure is in place for the future.

### **Energy**

In order to deliver on the government agenda for reliance on renewable energy and to enable carbon reduction, significant investment in infrastructure for energy is required. Whilst wind farms onshore and off shore continue to be delivered other forms of energy such as heat networks, energy from waste, hydrogen production have been slower in their delivery. There has been continued concern from developers (both social and private) and consumer confidence in terms of affordability and lack of significant investment in the delivery of appropriate infrastructure. Much of the approach in planning to date has been about future proofing and enabling but the challenge continues to be around ensuring delivery and this can only be achieved through establishing at a national level appropriate levels of investment, incentive and regulation.

### **Drainage**

In response to climate change it is recognised that SUDs provides a sustainable form of drainage as well as providing opportunities for green space and biodiversity within the development and

in most instances that can be achieved successfully on site. However with the promotion of brownfield sites first and within a city such as Dundee which is seeking to deliver a sustainable approach to land release and delivery on brownfield sites drainage and the existing drainage network and stance by Scottish Water continues to create significant obstacles which prevents and delays in the delivery of key vacant and derelict brownfield sites and in particular housing in the City. Significant investment in drainage infrastructure well beyond that which viable developments can contribute to is required to release the effectiveness of sites and help authorities deliver sustainable development.

### **Digital**

Access to digital infrastructure is a key driver of economic activity, allowing a more sustainable, innovative and adaptable workforce and business. Investment is needed to ensure widespread high speed infrastructure to overcome constraints in terms of delivery of modern connectivity particularly in business parks/economic development areas and ensuring the delivery and access to this infrastructure at an affordable cost to the end user to ensure that it is inclusive and promotes equality.

### **Green space**

The value of green space and green infrastructure in terms of its positive contribution to climate change, health and wellbeing and a sense of place has been recognised in the previous sections. This value needs to be raised further as something that is not an “add on” to development but integral in the design and scope of a project. Nationally the status of providing green space and maintaining green space needs to be recognised with investment in its creation as well as its maintenance demonstrating its importance in helping to address issues of flooding, drainage, air quality and ultimately how it can be used to respond to climate change. This may include an opportunity to extend the biodiversity duty on developers and applicants in a way that contributes to carbon reduction (some authorities there is a requirement for tree planting schemes to offset impacts of development).