

Thank you for the opportunity for early engagement in respect of NPF4.

On behalf of Dundee Civic Trust I address below our views on the issues upon which you would like comments:-

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

Our open letter of 15 October 2019 to the First Minister/Chief Planning Officer sets out our views. In particular, we consider that the First Minister's declaration of a climate emergency shows that there is a pressing need to have a presumption against greenfield development in favour of developing in brownfield sites which are capable of being achieved at reasonable cost for existing services and infrastructure. Our reasons are specified in our email to the First Minister, and these include the extra transport costs and associated pollution when housing developments are placed in greenfield sites, which are typically in semi-rural areas. We note some English regions are considering this policy, and that central Government funds should be available for this very purpose, including in Scotland. There should be a Register of brownfield sites which may be available and suitable for housing.

The Chief Planner has given a helpful reply to our letter, but we believe that Dundee needs more help in bringing sites within the city into beneficial use. For example given the pressures to release greenfield sites Dundee should be given priority to access the Vacant and Derelict Land Fund

2 How can Planning best support our quality of life, health and wellbeing in the future?

The Trust believes that any policy must be central to the strengthening of existing communities, by building on existing infrastructure and insisting on high quality design that creates safe and welcoming places to live, work and play. Carefully planned and well designed mixed use development should be encouraged rather than rigid zoning where appropriate. The development of brownfield sites helps to reduce urban sprawl. Greater amounts of and higher standards of greening, with parks and trees undoubtedly improves the quality of life for those living nearby.

Key to this aim are policies such as Town Centres First which promote city centre regeneration. These policies can be achieved through the encouraging of a range of different uses to bring vibrancy to the city centre which has less reliance on purely retail uses. We also support the concept of Low Emission Zones, development of Park and Ride stems, and the reduced dependency on car travel through improved public transport.

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

This is largely covered by our other answers. Encourage mixed use development. Insist on good design. Utilise existing infrastructure. Improve public transport. Reduce car dependency. Strengthen existing centres. Improve quality of life. All of these are challenging, but achievable, aspirations.

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

As well as our opinions specified above we emphasise that there is a need to find ways to incentivise the thoughtful and realistic reuse of historic or listed buildings and buildings at risk, with uses that do not conflict with other planning policies. The concept of Master Plan Consent does concern the Trust. How will planning ensure high quality design for people living and working in these areas if there is no need for detailed planning approval? Design guidance is notoriously open to interpretation.

5. What infrastructure do we need to plan and build to realise our long term

aspirations? (1) The Trust supports public transport, and this includes plans to electrify the main east coast railway north of Edinburgh, and also the line to Perth and to Glasgow.

(2) Outdated water services infrastructure is an issue in respect of development of brownfield sites, as detailed in our letter to the First Minister.

(3) The congestion on Kingsway, Dundee, is a matter of concern both locally and also for the economy of north east Scotland. Given the surrounding residential areas it may well be that a suitable practicable solution may be a city bypass. This would need to be carefully planned to avoid damage to the rural environment in the Carse of Gowrie and below the Sidlaw Hills.

We are aware that there are directly contrary views, and the Trust's opinion is not unanimous.

A final point that Dundee Civic Trust wishes to make at this stage is the pressing need to redraw Dundee City's administrative boundaries. The city's extraordinarily tightly drawn boundaries - on opposite sides of the same street in suburbs of the city - mean that communities in Angus, Perth and Kinross and Fife look to the city for much of their services and are an integral part of the city's economy. There are many reasons for change including anomalies in school catchment areas, as highlighted by the recent proposed changes to the catchment area of Harris Academy. Of particular concern for planning is that the logical area for strategic planning of the city's development plans is administered by four local planning authorities. We believe this has over the years resulted in decisions that do not benefit the city, and nor, by extension, the neighbouring areas either. A report submitted by Dundee Civic Trust to the Local Government Boundaries Commission for Scotland in 2016 is attached. The LGBCS deferred consideration at that time until at least June 2022. We think this timescale should be brought forward.

I hope that these comments will help in you moving to the next stage of your plans and we look forward to your feedback.

Yours sincerely

Donald Gordon

Chairman, Dundee Civic Trust