

Proposed Dundee Local Development Plan 2012

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Your comments will be applied to the following items:

3 National Planning Framework 2: Key Drivers for Dundee - Paragraph 3.3

It would be helpful to know what is meant by the phrase "sustainable growth". Is it meant to mean "economic growth that can be sustained for a long period into the future", or "economic growth that promotes the health of ecosystems and respects environmental limits, whilst maximising benefits to communities".

3 National Planning Framework 2: Key Drivers for Dundee - Paragraph 3.5

What is meant by "connectivity"? The changes to the Waterfront have for some years been very disruptive for those seeking to travel on foot and by bike, and those with pushchairs or with mobility difficulties or visual impairment. If the Waterfront is to be genuinely "sustainable" as the noticeboard proclaims, and of benefit to the people of the city, then connectivity into and through the Waterfront area for those walking and cycling should be given a higher priority than hitherto, both during the ongoing works and in the finished design.

5 Sustainable Economic Growth - Paragraph 5.7

Linlathen and the Western Gateway should not be prioritised as Strategic Development Areas whilst there are several large vacant sites along the Kingsway which could accommodate major industrial developments. This is contrary to the fine principles on sustainable development, minimising dependence on the private car and promoting active travel, protecting greenspace, integrating new development into existing community infrastructure, etc, minimising resource use, etc, in Figs 5 & 6. It is contrary to the principles set out in Tayplan, and is therefore in breach of the requirements for the Local Development Plan.

5 Sustainable Economic Growth - Paragraph 5.10

We support this commitment to make the most of opportunities to develop Dundee Port area for renewable energy-related developments which can contribute to significant reductions in greenhouse gas emissions, but not for the proposed biomass power station which would result in significant additional carbon emissions in the coming decades, have major impacts on environmental and social conditions in countries from which fuel is sourced, contribute to increased world food prices, add to the already-high air pollution levels in Dundee, and be highly inefficient and very poor value for money for the Scottish taxpayer.

5 Sustainable Economic Growth - Paragraph 5.15

Are these greenfield sites at Claverhouse? If so, the priority for development should be on existing large vacant brownfield sites on the Kingsway - referred to in the subsequent paragraphs.

5 Sustainable Economic Growth - Paragraph 5.18

Yes, we welcome this statement - it should mean that such sites are prioritised for development given their higher sustainability credentials.

6 Promoting High Quality Design - Paragraph 6.6

These are very worthy principles. Those relating to active travel and connections to the surrounding area could be given greater rigour by requiring all developments over £1m also to provide an Outdoor Access Plan consistent with SNH guidance. The existing housing developments north of the Abroath Road at Linlathen demonstrate how good internal path networks can be provided without linking effectively into wider networks, particularly the paths along the Dighty valley. They also show how major housing developments can gain approval despite being designed without consideration for through routes for bus services. Such bad design should not be tolerated if the principles set out in this Local Development Plan and Tayplan are to be respected in practice.

7 Quality Housing and Sustainable Communities - Paragraph 7.5

We support this statement, particularly with the focus on using brownfield land. There is no statement in the Plan about the benefits in terms of reduced environmental impacts and improved social interaction resulting from compact urban design, although it is hinted at in the reference earlier to "integrating new development into existing community infrastructure".

7 Quality Housing and Sustainable Communities - Paragraph 7.7

Despite the clear statement on land allocation for housing in para 7.5, para 7.7 indicate a weakening of this position with the only explanation being to ensure an adequate range of housing choices. This is putting housing choice ahead of the stated principles on land allocation and the fine statements of principle about sustainability both in the Local Development Plan and Tayplan. The sites identified at Baldragon Farm and Linlathen should only be brought forward for development if there is convincing evidence that people working in Dundee are choosing to live

further afield for lack of suitable housing, and commuting to Dundee by car, and that these sites will maximise opportunities to travel to work by public transport or active travel. In the case of Linlathen, rather than the site identified for release in 2020, which would create another spur road, a site situated between Strathyre Avenue and Balmossie Meadow would be better. This would enable a link to be created (by the developer) with a single-lane bridge over the Dighty for use only by buses and cyclists/pedestrians, but closed to cars. This would positively discriminate in favour of sustainable travel and enable a practical through-route to be opened up for a bus service for all these developments. The mapping also does not seem to take account of the retirement housing approved at Linlathen in July 2012.

7 Quality Housing and Sustainable Communities - Paragraph 7.9

The reference to energy efficiency is welcome, but vague. What level of efficiency is sought? Building Standards set a minimum requirement, and we would urge Dundee City Council to explicitly set higher standards as the statement implies. We would also urge the City Council to adopt the Merton Rule or something similar, requiring micro-renewables to be incorporated wherever possible into building design, where this can be achieved more cost-effectively than by retrofitting. At the very least, houses should be positioned to maximise the south-facing aspect for solar energy. Ground source heat pumps would also be much easier to incorporate at the design stage, just as with other modern infrastructure. Opportunities for district heating or community CHP should also be promoted. This is an area where the fine words on sustainability set out in the statements and conceptual diagrams should be given some substance, where Dundee should show some ambition to live up to its "Solar City" status and make the most of the expertise available at its universities. Housing projects (including restorations of old buildings such as Halley's Mill) will be designed to last to 2050 and beyond, when we aim to have our greenhouse gas emissions reduced by 80% from 1990 levels (even with lower efficiency legacy housing). There are demanding targets for energy efficiency for 2030. That's why the sustainability principles need to be taken seriously - but there is little evidence in the document of how the City Council intends to put these into practice in a tangible sense. Appendix 3 on Housing Design makes no mention of energy efficiency or incorporation of renewables - these should be included in a new Sustainable Construction Guide which developers are required to utilise both for new build and restoration/conversion of existing stock. Yet there is a requirement for storage provision for cycles, which is welcome. [Now I see coverage of this in Chapter 9 - but this is hardly a cross-cutting approach - there should at least be cross-references in this chapter to the relevant paragraphs in Chapter 9, and ideally the details would be better incorporated in Chapter 7 so they are not overlooked]

7 Quality Housing and Sustainable Communities - Paragraph 7.11

Changes to existing housing should also provide an opportunity to incorporate improvements to energy efficiency and the possibility of micro-renewables.

8 Town Centres and Shopping - Paragraph 8.20

The three commercial centres are all heavily dependent on car-borne visitors, so they make a significant contribution to the city's Greenhouse Gas Emissions. There is no recognition of this in this paragraph. There could be an active policy to encourage increased use of buses through a better range and frequency of services, and promotion of facilities for shoppers to encourage them

to use buses, such as prominent bus stops and safe storage lockers for their shopping whilst they are waiting or visiting other shops.

9 Sustainable Natural and Built Environment - Paragraph 9.20

There continue to be periodic flood incidents in Dundee. There is also the expectation of gradual sea level rise and more frequent and severe storms due to climate change. Flood risk would seem to merit more discussion, particularly in the light of the references earlier in the document to the important of adaptation to the impacts of climate change. What is the current assessment of risks from the different types of flooding and storm damage? What measures are being taken to anticipate and manage the threat of flooding along the length of the waterfront? What measures are being taken to protect the beach areas from erosion, flooding and storm damage? How is climate resilience being incorporated into construction requirements (another topic for a sustainable construction guide)?

9 Sustainable Natural and Built Environment - Paragraph 9.3

It's good to see this small but important requirement, but why isn't there a cross-reference to this in Chapter 7 and some coverage of this in Appendix 3? Also, this could be encouraged in, for example, conversion of buildings, as being a positive enhancement to premises which might be more likely to secure planning consent.

9 Sustainable Natural and Built Environment - Paragraph 9.5

We welcome the statement: "All major biomass plant will be expected to mitigate emissions by installation of appropriate abatement technology" and trust that this would apply to the abatement of CO2 emissions if the proposed Forth Energy biomass power station secures consent from the Scottish Government.

9 Sustainable Natural and Built Environment - Paragraph 9.13

There is reference early in the document to Dundee's environmental assets, and as well as the Open Space Strategy it would be beneficial if a database or register of these assets was to be drawn up and made publicly available online. It could indicate the categories of assets, provide some summary information on the scale and significance and current use of each one, and indicate any assets that are under threat, together with the owner or Council Department responsible for maintaining the asset. The Open Spaces, and woodlands, would be important components of this. Members of the public would be able to refer to the register and also to notify the Council if any assets are damaged. This would help the Council to get an overview of the situation and changes over a period of time, and enable the public to scrutinise this and raise questions. An index of the health of Dundee's environmental assets could be produced annually, showing the cumulative level of improvement or deterioration, providing a useful barometer of the status of these important assets.

10 Sustainable and Accessible Transport - Paragraph 10.4

We welcome this Policy statement.

10 Sustainable and Accessible Transport - Paragraph 10.6

It would be good to add to the end of this paragraph something to say that "whilst motorised vehicles remain the principal mode of transporting goods and people in use today, the Council will energetically promote measures which make it easier for people to reduce their car use in favour of active travel (particularly for shorter journeys) and use of public transport," It would be good to see a clear commitment to seek a reduction in use of motor vehicles year-on-year, resulting in a range of environmental benefits in line with the statement of principles in this Development Plan and Tayplan. It would also be good to see a commitment to extend the coverage of the 20mph limit to many other residential streets across the City, in line with Scottish Government policy. It should become the default, rather than the exception.

10 Sustainable and Accessible Transport - Paragraph 10.12

What is the "sustainability" element of the parking strategy?

10 Sustainable and Accessible Transport - Paragraph 10.17

We welcome the steps being taken to set up Park and Ride facilities on the main routes into Dundee, but these situations are seldom clear-cut. It is unclear why the western Park and Ride has been proposed at a site which significantly intrudes into the new Riverside Nature Park, recently restored after many years at great expense, rather than using one of the possible sites to the west of the Swallow Roundabout where the benefits would be much greater in terms of reducing the traffic pressure on the roundabout and improving air quality in the west of Dundee. It would not be a welcome addition to the rural landscape either, but it could be carefully screened and the greenspace lost might be of less strategic value. Is it just to simplify the process by locating it within the Dundee City boundary? Or is it to complement the proposed Rail interchange? In any event, the impact on air quality, local amenity and greenspace should be carefully considered against the alternative benefits of a site to the west of the Swallow Roundabout. This proposal also seems to give no regard to the convenience of the people of Invergowrie, who would lose their rail services. We support the development of rail services in principle, and the introduction of commuter services around the Tay Estuary as soon as possible, but the closure of Invergowrie station does not seem to be a positive move.

4 From Vision To Strategy - Paragraph 4.4

There is nothing in Chapter 9 about the A90, even though the Strategic Map refers to the possible upgrade of the A90 through or round Dundee. Perhaps this omission is not surprising, as it would be contrary to the principles of sustainability, climate change mitigation, and encouragement of sustainable transport. Any rerouting round Dundee would have a massive impact on greenspace as well. We need to be working towards lower road traffic volumes over the next 20 years and this possibility should be dropped from the map.

5 Sustainable Economic Growth - Paragraph 5.29

Where existing industrial areas are close to residential areas and have experienced closures, if there is a persistent lack of demand for new industrial use, should there not be active

consideration given to shrinking the industrial area to allow new housing?

7 Quality Housing and Sustainable Communities - Paragraph 7.28

These points about developer contributions are supported. In relation to green infrastructure, the restoration of the Linlathen Bridge is a good example of this. If further development does take place in this location, the City Council should seek to ensure that developers contribute towards the cost of completing the missing section of core path 22 which runs alongside the Dighty, and which would enable the public to get full enjoyment from one of the few remaining stretches of rural landscape in Dundee (and see Linlathen Bridge along the way).

Equal Opportunities Monitoring Form

The questions on this page are OPTIONAL. You can submit your comments by pressing the Submit Comment button at the bottom of the page.

This is sensitive personal data and will be treated with the utmost confidentiality in line with the requirements of the Data Protection legislation. The data will only be used for general statistical and monitoring purposes.

Gender:

Male

Ethnic Origin

Ethnic origin is not about nationality, place of birth or citizenship. It is about colour and broad ethnic groups. UK citizens can belong to any of the groups indicated.

How would you describe your ethnic origin?

British

Age:

45-64

Do you have a health condition or disability as defined by the Equality Act 2010?

No

The Equality Act 2010 states that a person has a disability if they have a physical or mental impairment and the impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. A 'substantial disadvantage' is a disadvantage which is more than minor or trivial. 'Long-term' means that the effect of the impairment has lasted or is likely to last for at least twelve months (there are special rules covering recurring conditions). Further guidance in relation to the meaning of disability is accessible on the Equality and Human Rights Commission website <http://www.equalityhumanrights.com>

Do you consider any sections in the Proposed Dundee Local Development Plan 2012 plan to be discriminatory in terms of age, disability, race, religion or belief, gender or sexual orientation?

No

If YES, please detail which sections.

If you have made a formal objection, did you do so on the grounds of discrimination in terms of age, disability, race, religion or belief, gender or sexual orientation?

No

If YES, please detail which sections.