

MIDSTEEPLE

QUARTER

**Response to Scottish
Government Draft National
Planning Framework 4
consultation**

April 2022

About Midsteeple Quarter

Midsteeple Quarter is a Community Benefit Society, established and run by the people of Dumfries. We are pleased to have the opportunity to submit our views in writing to this consultation and to highlight some of the work taking place here.

Our aim is to help shape a new future for our town centre; one that responds to the needs of our community and is run for their benefit. Our core principle is that local people have the innovative solutions for our town - and that a significant part of the answer is through community ownership.

We believe that the community having greater control over its own destiny is the best route towards sustainable prosperity that is shared fairly amongst everyone. Planning policy has a critical part to play in unlocking that potential.

Midsteeple Quarter has already bought five prominent buildings in the area from where its name is taken and is working to bring them back into use - creating new business opportunities and homes.

We expect to begin work later this year on our first significant phase of construction. It will see a building transformed and extended, creating enterprise space at ground level and part of the first floor as well as seven flats on its upper floors.

The creative enterprise area will include space for pop-up projects, one-off events, long-term units for hire, a retail unit and co-working space. The homes - which will be owned by Midsteeple Quarter Community Benefit Society - will be available to rent at an affordable-to-mid-market rate.

We have already brought another formerly empty building back into full-time use, while have two others available for "meanwhile" uses while we progress our development vision.

Contact

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Part 1 – A National Spatial Strategy for Scotland 2045

1. Sustainable places. Our future net zero places will be more resilient to the impacts of climate change and support recovery of our natural environment. Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?

Our view is that there needs to be a significant focus on low and zero-carbon design if we are to step-up our game on sustainability. There needs to be greater focus on retro-fitting, which is a major element of what Midsteeple Quarter is trying to achieve in Dumfries - taking our historic built assets and making them fit for the future. We believe policy needs to recognise the importance of the embodied energy and resources in our historic town centres and to support the retro-fitting and repurposing of these buildings for resilient futures. This, furthermore, needs consideration in taxation and planning systems - in particular a zero VAT rating on renovation works on buildings as well as on construction.

We cannot afford to overlook the need for a strong circular economy as we seek to embed sustainability and resilience in all that we do. National policy should empower communities to work with local materials and respond to local needs. This, for example, could include long-term support for the development of sharing libraries and re-use hubs close to where people live.

The integration of green corridors in urban spaces - such as vertical and rooftop gardens, rainwater recycling, community green spaces on vacant and derelict land - should also be encouraged.

So too should the ongoing development of renewable energy as part of construction projects and local development frameworks. We can see the powerful potential of creating more district energy networks for heating and supporting connection of multiple small-scale solar projects. In tandem with this, we would suggest that grid and sewer systems be updated, with the lack of sewer capacity is a challenge for our own renewable energy scheme ambitions.

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It is also increasingly acknowledged that the need to encourage maximisation of active travel and its integration with public transport through infrastructure investment is critical to make our communities more sustainable.

2. Liveable places. Our future places, homes and neighbourhoods will be better, healthier and more vibrant places to live. Do you agree that this approach will deliver our future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live? Do you agree that this approach will deliver our future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live?

Delivering on the vision for 20-minute neighbourhoods - as we are striving to do in Dumfries - is a critical part of ensuring more resilient, better, healthier and more vibrant places to live.

Public service providers should seek to relocate in centrally accessible locations. Town centres and High Streets should be the focus for the provision of services which generate significant numbers of trips. This is not just about retail, but also health, administrative, learning, enterprising and cultural uses.

Town centre living has an important part to play in the future. Where appropriate, residential use on upper floors within town centre and High Street buildings should be encouraged in order to provide efficient use of space and the creation of diverse and distinctive places, which deliver for both the economy and the environment. The gentle density of multiple storied buildings of mixed use with residential on upper floors within central locations should be encouraged.

We need to ensure support for inter-generational living, community housing trusts and community enterprises, housing co-ops and community benefit societies. This will allow us to create affordable housing with a social benefit.

It's vital that policy prioritises people over cars in urban spaces to ensure safe and easy access on foot or by bike and that we support the development of shared cargo e-bike hubs for transport of larger items/children.

Pride is important. As is being done in Dumfries, we should engage the creative sector in regeneration in order to create a sense of place and encourage multiple use of central public spaces and buildings.

As we create town centres where people work, live and visit, there needs to be support to create a positive night-time economy in urban centres.

3. Productive places. Our future places will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing. Do you agree that this approach will deliver our future places which will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing? Do you agree that this approach will deliver our future places which will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing?

We need more targeted support for social enterprises such as Midsteeple Quarter. There also needs to be a sustained focus on evaluating the impact of businesses on community and supporting roll-out of green skills that are relevant to communities across Scotland - eg rural residents and businesses often have to import expertise from elsewhere for essential maintenance tasks like checking sprinkler systems, unusual heat pumps or even PAT testing . Every region should have training hubs for essential maintenance and retro-fitting works.

4. Distinctive places. Our future places will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient. Do you agree that this approach will deliver our future places which will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient? Do you agree that this approach will deliver our future places which will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient?

We need a stronger commitment to place-making through a design-led approach and focus on quality. This must recognise the local distinctiveness and character of the built environment, together with the embodied energy in older, historic properties. We will never build to the standard or scale as we did in the 18th-19th century. We need to ensure what remains from that period is given new life, adapted to new uses and appropriate to current needs whilst also being made more energy efficient.

Midsteeple Quarter is working to create a more efficient and equitable use of assets and have a design-led approach to improve our town centres through the reuse of vacant and derelict land and buildings. We are also enhancing our historic environment and safeguarding our shared heritage for future generations. The community is taking the lead on this through organisational structure and community engagement.

5. Distinctive places. Our future places will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient. Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive? Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?

Priorities need to be evaluated and prioritised at a local community level, with strengths and weaknesses identified by the people who live there in order to direct a strategy for a more resilient future place. We welcome the introduction of community ownership and community wealth building and the wellbeing economy into planning policy.

Indeed, it is our hope that Midsteeple Quarter will become a prime example of the benefits which can be achieved through community ownership and in building a fairer community which delivers for all.

6. Spatial principles. Do you agree that these spatial principles will enable the right choices to be made about where development should be located? Do you agree that these spatial principles will enable the right choices to be made about where development should be located?

There are a number of factors which should be taken into account when considering where developments should be located.

A . Compact growth: Support communities to increase density of use in town centres through enabling mixed-use developments that combine retail, culture, leisure and living.

B. Local living. We agree with 20-minute neighbourhoods but this needs improvement of urban infrastructure and deprioritisation of cars.

C. Balanced development: We need to support young people to stay in rural communities by enabling them to work anywhere from here (better digital infrastructure), support co-working hubs and support delivery of skills training across the country to work in new sustainable jobs.

D. Conserving and recycling assets: Support community re-use hubs and repair projects (see above re: embodied energy of historic buildings). The reuse of older buildings will also build local distinctiveness and retain vernacular character, reducing the 'clone town' and same appearance of many town centres.

E. Urban rural synergy: We need to recognise the importance of "service hub" towns to rural areas to ensure they are vibrant, thriving spaces and that those living nearby have easy (car-free) access.

F. Just transition: There is a need to support community-led organisations (such as Midsteeple Quarter) to develop plans and places. The challenge here is handling the needs of different communities when they connect and potentially conflict. Policy should consider how to bring together communities through local networks so they can work together, not apart.

7. Spatial Strategy Action Areas. Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?

Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?

No, though the key word in southern sustainability is "CONNECTED". The south is not well connected within itself and there's not much in this consultation document that looks to address that. The connections proposed mostly involved passing through the region to elsewhere, not improving internal links. Whether by car or public transport. It would take all day to get from Cairnryan to Eyemouth.

8. Southern sustainability. Do you agree with this summary of challenges and opportunities for this action area? Do you agree with this summary of challenges and opportunities for this action area?

We have concerns over what appears to be a lack of ambition regarding the south, an area which, in our view, continues to be forgotten and neglected. Does the "sustain" element of this point essentially mean more of the same? Other regions get titles that imply investment and some form of change. The south's designation appears to merely mean to continue existing.

A lot of towns are missing from their low-carbon network, including Dumfries - the largest town in southern Scotland. It is really noticeable that the Stranraer Gateway project doesn't mention the connection to the wider area. Where do people come/go from to Cairnryan? The Borders Railway gets a mention, but there is nothing on western rail links. High-Speed rail passes through the region and doesn't stop or connect.

We absolutely agree that high-quality and green jobs are needed - and should be further developed - supporting wider community wealth building.

17. Southern sustainability. What are your views on these strategic actions for this action area? What are your views on these strategic actions for this action area?

We are concerned that the consultation appears to include very little on infrastructure - especially the lack of good bus, rail and active travel routes, which all contribute towards connecting communities. There are longstanding issues surrounding rural connectivity which need to be addressed. We need to have a network that encourages outdoor recreation and green tourism by helping people to get around.

Access to employment locally is a challenge without investment in public transport, so emphasis on remote working makes sense. We know through our own networks that public transport as it stands is a real struggle for younger people and a barrier to them living more of their lives locally, often leading to them moving away permanently.

In education, we need to increase not "continue" support for local skills development, including FE and HE. The Crichton Campus in Dumfries has massive untapped potential for green skills training and medical training (which would have knock-on effects for the sustainability of our town centre and Midsteeple Quarter's work).

More widely, we need to look at the decarbonisation of existing buildings, not just homes. EV charging is another issue. We need to consider e-bikes as well as cars and especially secure and weather-protected storage of the same.

We are not sure why there is work needed to "build the case" for public transport routes given absolutely everything above will rely on better public transport. 40% of footfall in Dumfries comes from people who got there by public transport or active travel.

Digital connectivity is another issue in need of being addressed in policy to ensure people have the opportunity to plug into co-working hubs.

18. National Spatial Strategy. What are your overall views on this proposed national spatial strategy? What are your overall views on this proposed national spatial strategy?

Frankly, we feel it's disappointing for the south. It does not join up the dots between different areas.

Part 2 - National developments

20. Is the level of information in the statements of need enough for communities, applicants and planning authorities to clearly decide when a proposal should be handled as a national development?

Again, pickings seem thin for the south here. Chapelcross as a site for green skills development is a fine idea, but how will it engage with existing FE and HE sites eg SRUC at Barony and Crichton (with the success of all of these places important to a regional centre such as Dumfries and the work we are doing in Midsteeple Quarter? How will it meaningfully link with Stranraer given the distance and lack of public transport infrastructure? Where is the low carbon heat ambition for Dumfries? Strong local power connections are vital in all of this.

The HS2 railway line is shown as a benefit for the south but it is only likely to pass through Dumfries and Galloway. It's a benefit for the central belt - not South. Cost competition and betterlinks are the priority for communities here. For example, it is ludicrous that it takes twice as long to travel from Dumfries to Glasgow by train than it does by road.

Part 3 – National Planning Policy

23. Policy 1: Plan-led approach to sustainable development. Do you agree with this policy approach? Do you agree with this policy approach?

Yes. The plan-led approach is fundamental to good planning. Community-led regeneration schemes should be actively involved in the process of influencing their local development plans and local place plans. Midsteeple Quarter and Dumfries Partnership Action Group are good examples of this in practice.

24. Policy 2: Climate emergency. Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency? Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?

This policy and the nature one need to be considered in parallel, not separately.

25. Policy 3: Nature crisis. Do you agree that this policy will ensure that the planning system takes account of the need to address the nature crisis? Do you agree that this policy will ensure that the planning system takes account of the need to address the nature crisis?

This policy and the climate one need to be considered in parallel, not separately. It is not stated whether they are measuring biodiversity, or what an impact assessment would look like, and who would oversee and assess that.

26. Policy 4: Human rights and equality. Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality? Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality?

This is very woolly. More support needs to be provided for communities and individuals to navigate the planning process - especially community councils and development trusts. It is not stated how community right to buy - in which Midsteeple Quarter has an interest - would fit with all this.

27. Policy 5: Community wealth building Do you agree that planning policy should support community wealth building, and does this policy deliver this?

Do you agree that planning policy should support community wealth building, and does this policy deliver this?

We welcome the introduction of community wealth building into planning policy, but, as above, it is not clear how communities will be supported to understand and comment on planning applications that relate to this? Planning applications which demonstrate clear benefits to community wealth building should have that benefit included as a material consideration in favour of granting permission. Applications made by communities for development which is to the benefit of the community should not be required to make commuted payments to (for example) affordable housing, greenspace, infrastructure, etc.

28. Policy 6: Design, quality and place. Do you agree that this policy will enable the planning system to promote design, quality and place? Do you agree that this policy will enable the planning system to promote design, quality and place?

It is not clear how “detrimental to character” is defined and by whom. The community know best what is best for their place (as we are working to demonstrate in Midsteeple Quarter), but it is very difficult to define this in design terms. It is also very difficult for the community to communicate this and facilitate consensus. Forums for this type of conversation are required.

29. Policy 7: Local living. Do you agree that this policy sufficiently addresses the need to support local living? Do you agree that this policy sufficiently addresses the need to support local living?

We believe that Midsteeple Quarter is a good fit for “Six Qualities of Successful Places” and 20-minute neighbourhoods concept.

MSQ is a keen proponent of the 20 minute neighbourhood concept and has provided evidence to the Economy and Fair Work Committee on this subject. However, within NPF4 it is not clear how to integrate those from outside the 20-minute neighbourhood with its services, especially where urban hubs service wider rural communities.

It is generally mentioned in passing, with little to say on measurement or delivery. We need to create new employment opportunities in places where people live, within easy

access for communities and a choice of transport modes. Higher density to deliver is key to delivering 20-minute neighbourhoods and it must be part of an urban focused policy. However, the applicability of the 20-minute neighbourhood idea to rural places requires clarification.

30. Policy 8: Infrastructure First. Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure-first approach to planning? Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure-first approach to planning?

Yes, this is supported. In practice, infrastructure and regeneration plans are currently not well aligned. Improved cross-sector connectivity between national, regional and local agencies and actions is needed to link regeneration activity within the decision making on infrastructure. Greater public sector project investment is needed to address this. Transport infrastructure investment outside of cities and large towns is lacking.

The decline of rural bus services is a problem, particularly for households without access to a car, which increases the reliance on car transport in rural areas.

31. Policy 9: Quality homes. Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives? Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives?

We are supportive of the focus on affordable housing, local demand and the incorporation of the six qualities of successful places along with alignment with place-making.

However, there should also be support for intergenerational housing, higher density and mixed use development, including housing in town centres, a key strand of our work on Dumfries High Street. We are concerned about 'statements of community benefit' and how they would be monitored and enforced.

We would like to see the growth of community led housing in Scotland, particularly in rural areas where commercial housing activity is less economical and building costs

generally significantly higher. This can be linked to the promotion of productive reuse of derelict and vacant buildings and land.

32. Policy 10: Sustainable transport. Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices? Do you agree that this policy will reduce the need to travel unsustainably, decarbonise our transport system and promote active travel choices?

Only to a limited extent. As stated already, the decline of rural bus services is a problem, particularly for households without access to a car, which increases the reliance on car transport in rural areas. The lack of efficient rail links from Dumfries to the central belt - and to the west of Dumfries and Galloway - is a major factor holding back regeneration of our towns and region.

33. Policy 11: heat and cooling. Do you agree that this policy will help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures? Do you agree that this policy will help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures?

We would like to see more clarity and proposals on how community-led renewables and district heat networks can be embraced, enhanced and extended. Much in here on community-led renewables and district heat networks.

36. Policies 14 and 15 – Health, wellbeing and safety. Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities? Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities?

There is a lot more which could be made of this subject. We should be building neighbourhoods and communities that feel safer, especially for women, and considering their safety through urban design and planning.

37. Policy 16 – land and premises for business and employment. Do you agree that this policy ensures places support new and expanded businesses and investment, stimulate entrepreneurship and promote alternative ways of working in order to

achieve a green recovery and build a wellbeing economy? Do you agree that this policy ensures places support new and expanded businesses and investment, stimulate entrepreneurship and promote alternative ways of working in order to achieve a green recovery and build a wellbeing economy?

We need to create new employment opportunities in places where people live, within easy access for communities and a choice of transport modes. Higher density and mixed use development are key to delivering 20-minute neighbourhoods. Appropriate employment and business uses should be supported in town centre locations and seen as part of the community, not just allocated on peripheral locations. This could assist in the regeneration of our town centres and high streets in the light of the contraction of retail. This is key to the work our organisation is doing.

39. Policy 18: Culture and creativity. Do you agree that this policy supports our places to reflect and facilitate enjoyment of, and investment in, our collective culture and creativity? Do you agree that this policy supports our places to reflect and facilitate enjoyment of, and investment in, our collective culture and creativity?

The policy needs to make more of the concept of creative place-making and regeneration through culture, which can support regeneration and local wealth building, but also enhance local distinctiveness and character. We have seen that in Dumfries through our work with colleagues at The Stove Network, Upland and DG Arts, Big Burns Supper and other arts and creative organisations.

40. Policy 19: Green energy Do you agree that this policy will ensure our places support continued expansion of low carbon and net-zero energy technologies as a key contributor to net-zero emissions by 2045? Do you agree that this policy will ensure our places support continued expansion of low carbon and net-zero energy technologies as a key contributor to net-zero emissions by 2045?

There is a need for more on community-owned renewables.

41. Policy 20: Zero waste. Do you agree that this policy will help our places to be more resource efficient, and to be supported by services and facilities that help to achieve a circular economy? Do you agree that this policy will help our places to

be more resource efficient, and to be supported by services and facilities that help to achieve a circular economy?

Our view is that support is needed for sharing libraries and repair cafes, plus minimising waste in transport of goods - focus on local procurement.

44. Policy 23: Digital infrastructure. Do you agree that this policy ensures all of our places will be digitally connected? Do you agree that this policy ensures all of our places will be digitally connected?

Given changes to many people's working patterns and locations as a result of the Covid pandemic - along with the development of new technologies - there is a greater demand for co-working space for short term use. The creation of co-working hubs in centrally located accessible locations such as in high streets, would assist in regeneration of these locations bringing footfall into the town centre throughout the week. This would provide opportunities for some vacant buildings.

45. Policies 24 to 27 - Distinctive places. Do you agree that these policies will ensure Scotland's places will support low carbon urban living? Do you agree that these policies will ensure Scotland's places will support low carbon urban living?

We agree with all the suggestions set out in relation to centres and uses, which the Midsteeple Quarter embodies. However, we do not support the idea of residential use at ground floor level within town centres, either through change of use or new development.

Where retail units are vacant, alternative uses other than residential should be encouraged in order to create activity and footfall and enhance the place by providing a wider variety of uses to give reasons for trips to the town centre.

46. Policy 28: Historic assets and places Do you agree that this policy will protect and enhance our historic environment, and support the re-use of redundant or neglected historic buildings? Do you agree that this policy will protect and enhance our historic environment, and support the re-use of redundant or neglected historic buildings?

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This policy is essentially the same as the current regime with respect to the historic environment, which is not working. From our experience in Dumfries, the conservation area and listed building status has not enhanced the built environment and has proven an obstacle to economic growth.

A radical rethink is required to better balance the need to protect and enhance heritage assets, which are important to placemaking and the distinctive character of a place, and opportunities to create new uses and activities which enhance local wealth creation and activity.

We also need to consider carefully balancing conservation and heritage needs with the need to create more energy efficient buildings.