

NPF4 Consultation - Response from Rural Housing Scotland

Q 1: 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?

While we welcome the ambition that every decision will contribute to making Scotland a more sustainable place and to tackle climate change and biodiversity loss. We are concerned however that NPF4 will not be sufficiently robust to corral decision making on the ground to enable the delivery of Scotland's future net zero places.

The document lacks **a clearly articulated robust policy hierarchy**, and as such there are too many holes and exceptions. Unless a clear policy framework and hierarchy is articulated in NPF4 to inform local development plans and decisions around proposals, too many decisions will be left to local planners and officers to decide whether the climate, the economy or someone's scenic view has priority.

This is particularly important in ensuring that the NPF meets the six outcomes required by the Planning Act including increasing the population of rural areas.

Contrary to the requirement of the Planning Act this NPF proposes placing significant barriers to small scale affordable rural housing developments - more so than any hurdles to greenfield urban development. This despite small scale rural developments contributing to goals of rural repopulation and rural development and offering opportunities for climate change mitigation and biodiversity protection..

Q 2: 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?

Given that the National Planning Framework must contribute to a series of six outcomes including "increasing the population of rural areas" and in its preparation, the Framework is to have regard to the desirability of resettling rural areas that have become depopulated, it is concerning that there is no reference to this outcome or routes to repopulation in the discussion of "Liveable Places" or "Sustainable Places".

The emphasis placed on the concept of 20 minute neighbourhoods demonstrates the predominately urban context of the outlines approach. 17% of the population live in communities

of less than 3,000 and the NPF is charged with increasing this population. It would therefore be pertinent to include a narrative relating to creating liveable and sustainable rural places.

Given that the National Planning Framework will set out the context for future planning, can NPF4 do more than “hope to empower people to shape their places” Should NPF4 not set out how people will be empowered to shape their places through Local Place Plans.

Q 3: 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?

There is an opportunity here to talk about the opportunities to grow the rural population which arise through the changing nature of work and the increase in remote working and distributed workplaces.

We support the statement in Scottish Land and Estate’s response which says that:

“it should be recognised that rural areas may need some more specific targeted investment depending on the needs and characteristics of the area. Housing is also important to achieving these aims as population increases (especially in rural areas) can bolster local economies and should be referenced in this section

Q 4: 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 welcome the recognition of the distinctive nature of different places, but there is no direction as to how this approach will deliver our future places or definition as to the nature of these places.

The lack of direction and definition in the NPF4 is particularly marked in its references to rural Scotland. We agree with the Scottish Parliament’s Rural Affairs, Islands and Natural Environment Committee that “the **NPF4 needs to offer more of a vision for rural communities**. What does the plan envisage these communities to be? Will they have young people? Will they have attracted people from outside the community, and, if so, where from?”

We also agree with Scottish Rural Action that NPF4 requires **a clear approach to defining and capturing rurality in Scotland**. There seem to be several undefined categories such as fragile or pressured which have no definition and can be used locally to limit development.

Q 5: DO YOU AGREE THAT THE SPATIAL STRATEGY WILL DELIVER FUTURE PLACES THAT OVERALL ARE SUSTAINABLE, LIVEABLE, PRODUCTIVE AND DISTINCTIVE?

No. See responses to questions 1 to 4.

Q 6: DO YOU AGREE THAT THESE SPATIAL PRINCIPLES WILL ENABLE THE RIGHT CHOICES TO BE MADE ABOUT WHERE DEVELOPMENT SHOULD BE LOCATED?

The Town and Country Planning (Scotland) Act 1997 which directs the National Planning Framework has six outcomes including increasing the population of rural areas and in its preparation, the Framework is to have regard to the desirability of resettling rural areas that have become depopulated.

The six overarching principles place barriers in the way of rural development insisting on brownfield, 20 minute neighbourhoods, 'balanced development', redevelopment, and positing rural as an urban playground.

There is no vision or rural strategy and it fails the promise of the NPF4 Position Statement that sets out the clear intention to produce policies that positively encourage rural development to help repopulate and sustain rural areas through sustainable economic growth

Here the principles appear to reinforce a perspective of rural and island Scotland as a vast landscape devoid of community, industry and potential.

Far from being inherently unsustainable, rural areas offer opportunities to create housing which encompasses local food production, shared working space, renewable energy generation, community heat, and mutuality. **NPF4 can plan for net zero and, repopulate and sustain rural areas.**

Q 7: DO YOU AGREE THAT THESE SPATIAL STRATEGY ACTION AREAS PROVIDE A STRONG BASIS TO TAKE FORWARD REGIONAL PRIORITY ACTIONS?

No the areas are far too geographically diverse to be coherent and have meaningful priorities. Part of the *Central Urban Transformation*: Kintyre, Gigha and Arran which are apparently on the *urban fringe* are to pioneer low carbon urban living, and rediscover their urban coasts; whilst Balquhiddy is to accelerate urban greening, and in the *North East Transition* zone, Pitlochry is to plan a just transition from oil and gas?

Whilst the text suggests that each area can support all spatial strategies it would be useful to highlight that the priorities in the action areas are not exclusive and proscriptive.

We would also like to rural areas to receive the same attention as urban communities with perhaps a cross cutting priority of each action area to promote the growth of the rural population.

Q 8: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?

It is positive that the area is recognised for its contribution to biodiversity and renewable energy generation. It is also positive that each island's varying character is acknowledged as is the importance of the National Islands Plan as a lever for change.

Critical omissions in terms of opportunities are community land/asset ownership, the growth in remote working post pandemic, crofting, shortening supply chains with regards to food and materials, circular economies, the cultural and economic contribution of the Gaelic language and the prevalence of micro enterprise (social, community and private) which act as delivery mechanisms for all aspects of social, environmental and economic outcomes in rural and island communities.

Those listed here are interchangeable with those of the Northern Revitalisation area

The many challenges are listed but with no recognition of their intersectional nature such as the impact of lack of affordable housing on the difficulties in retaining and recruiting a local workforce.

Systemic challenges such as concentrated land ownership, poor infrastructure, poor housing conditions and cost of living and energy are omitted.

Like Community Land Scotland and Scottish Rural Action we do not see any tension between rural repopulation, biodiversity and net zero. Far from being inherently unsustainable, rural areas offer opportunities to create housing which encompasses local food production, shared working space, renewable energy generation, community heat, and mutuality. NPF4 can plan for net zero and, repopulate and sustain rural areas.

Q 9: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?

Creating carbon neutral coastal and island communities

Welcome recognition of need for affordable housing provision, emphasis on local and holistic place based solutions and housing needs of young and old.

Welcome assertion that “to reverse past depopulation, planning can help to sustain communities in more peripheral and fragile areas in a way that is compatible with our low carbon agenda” but the next sentence makes this almost impossible by qualifying that this can only take place “in line with our climate commitments and wider aspirations to create sustainable places that incorporate principles of 20 minute neighbourhoods and active travel networks”

Depopulation is an existential threat to rural communities in this area and the Northern Revitalisation area and addressing this should be a national priority. Therefore we believe there should be a housing and workplace initiative which is designated as a “national development to deliver sustainable, liveable places”. We proposed our Smart Clachan initiative as a national development and would invite their reconsideration as a national development to be piloted in priority locations.

There are no Liveable Places national developments outside of the central belt and cities. Given rural repopulation is a proposed outcome to be delivered by the NPF4 it seems extraordinary that Smart Clachan which is a project to advance this objective in a sustainable, achievable way is not designated as a national development.

Creating carbon neutral communities will also require strategic actions to build on the post pandemic distributed working practices. The example of Ireland is instructive, their National Hub Network and Connected Hubs initiatives are creating 400 community workspace/hubs in rural communities

Q 10: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?

Those listed here are interchangeable with those of the North and West Coastal Innovation area

Q 11: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?

As stated at 9.

Q 12: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?

Q 13: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?

This action area is incoherent - it seems like it's supposed to be Grampian as the challenges and opportunities are outlined as if it were but it also includes large parts of Perthshire which do not meet a mention. It also includes the Cairngorms National Park which also receives scant attention.

Q 14: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?

Q 15: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?

Another incoherent area which includes a vast rural area but focuses its attention on the cities

Q 16: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?

Q 17: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?

As above area is too large for the number of challenges, opportunities and strategic actions to be coherent and meaningful

Q 18: WHAT ARE YOUR OVERALL VIEWS ON THIS PROPOSED NATIONAL SPATIAL STRATEGY?

It requires greater clarity on principles and priorities and further consultation to grasp the challenges and opportunities of each area, in particular for rural and island places.

Q 19: DO YOU THINK THAT ANY OF THE CLASSES OF DEVELOPMENT DESCRIBED IN THE STATEMENTS OF NEED SHOULD BE CHANGED OR ADDITIONAL CLASSES ADDED IN ORDER TO DELIVER THE NATIONAL DEVELOPMENT DESCRIBED?

Q 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?

Q 21: DO YOU THINK THERE ARE OTHER DEVELOPMENTS, NOT ALREADY CONSIDERED IN SUPPORTING DOCUMENTS, THAT SHOULD BE CONSIDERED FOR NATIONAL DEVELOPMENT STATUS?

Depopulation is an existential threat to rural communities in this area and the Northern Revitalisation area and addressing this should be a national priority. Therefore we believe there should be a housing and workplace initiative which is designated as a "national development to

deliver sustainable, liveable places". We proposed our Smart Clachan initiative as a national development and would invite their reconsideration as a national development to be piloted in priority locations.

There are no Liveable Places national developments outside of the central belt and cities. Given rural repopulation is a proposed outcome to be delivered by the NPF4 it seems extraordinary that Smart Clachan which is a project to advance this objective in a sustainable, achievable way is not designated as a national development.

We are piloting Smart Clachan in Uist and at Tomduie in Perthshire and would welcome the chance to discuss how these and other could be adapted to fit with the National Development criteria. One potential route would be to adapt the Welsh One Planet Development policy - a possible set of principles for a Scottish version would be:

- Working to positively enhancing the environment wherever possible
- Using very low carbon building techniques
- Featuring on site food and energy production and waste assimilation
- Generating incomes from the land or from remote working
- Delivering good placemaking in a rural context, based on intergenerational and socially-inclusive communities, especially working families, that cooperate in the management of shared resources and that are integrated with neighbouring communities.
- Must be sole residence of the occupants, and feature predominantly affordable housing.
- Managed and controlled by a trust, co-operative or other similar community-based mechanism.

Q 22: DO YOU AGREE THAT ADDRESSING CLIMATE CHANGE AND NATURE RECOVERY SHOULD BE THE PRIMARY GUIDING PRINCIPLES FOR ALL OUR PLANS AND PLANNING DECISIONS?

Yes

Q 23: DO YOU AGREE WITH THIS POLICY APPROACH?

Yes - however a plan led approach incorporate flexibilities to enable interaction with Local Place Plans and development needs which arise to meet outcomes of national planning policy

Q 24: DO YOU AGREE THAT THIS POLICY WILL ENSURE THE PLANNING SYSTEM TAKES ACCOUNT OF THE NEED TO ADDRESS THE CLIMATE EMERGENCY?

The policy requires stronger directive language and to define terms such as in "public interest".

Q 25: DO YOU AGREE THAT THIS POLICY WILL ENSURE THAT THE PLANNING SYSTEM TAKES ACCOUNT OF THE NEED TO ADDRESS THE NATURE CRISIS?

Agree with the aim of this policy, but greater strength and clarity of language is required.

Q 26: 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?

Q 27: DO YOU AGREE THAT PLANNING POLICY SHOULD SUPPORT COMMUNITY WEALTH BUILDING, AND DOES THIS POLICY DELIVER THIS?

This is an opportunity for NPF4 to make a strong and clear statement about the importance of community-led local development in ensuring an impactful planning system and in creating or safeguarding community wealth.

We support the more pro-active wording suggested by Scottish Rural Action:

- a) Development plans should address **community wealth building** priorities by reflecting a people-centred approach to local economic development supporting a community-led approach to local economic development through the production of Local Place Plans. Spatial strategies should support community wealth building; address economic disadvantage and inequality; and provide added social value.
- b) Proposals for development within the categories of national developments and major developments should **contribute to community wealth building objectives**
- (c) A presumption in favour of community-led local development should be applied.

Q 28: DO YOU AGREE THAT THIS POLICY WILL ENABLE THE PLANNING SYSTEM TO PROMOTE DESIGN, QUALITY AND PLACE?

It will help

Q 29: DO YOU AGREE THAT THIS POLICY SUFFICIENTLY ADDRESSES THE NEED TO SUPPORT LOCAL LIVING?

The focus on 20 minute neighbourhoods has the potential to limit rural housing development. The caveats within the text suggesting that "the principle can be adjusted to include varying geographical scales from cities and urban environments, to rural and island communities' or 'this

concept will apply differently in urban and rural areas” are not detailed. We are left with the headline **bold** (and bald) policy that **“local development plans should support the principle of 20 minute neighbourhoods”** and nothing to explain how these fit with rural and island communities.

An explanation is required and a specific policy statement is required for rural areas to clarify how the geography of the policy is to be adjusted to enable development in rural communities

We agree with the concern in the Savills response that:

“this requirement could be applied crudely, especially to rural areas, recognising that a strict interpretation could continue the policy of only supporting development in larger locations with services which has contributed so much to negative spirals of service decline and our rural de-population issues. Our great concern here is that the read-across to the specific policies on rural areas, is in our opinion, inconsistent and potentially contradictory”.

Q 30: DO YOU AGREE THAT THIS POLICY ENSURES THAT WE MAKE BEST USE OF EXISTING INFRASTRUCTURE AND TAKE AN INFRASTRUCTURE-FIRST APPROACH TO PLANNING?

Rural infrastructure has been neglected for decades leading to poor transport, poor housing, poor connectivity and poor healthcare services. This proposed approach compounds this neglect by suggesting the limitation of development to locations of existing infrastructure.

Rural communities require improved infrastructure to enable the increase in population, to enable their decarbonisation, to enable remote working and community hubs. The suggested approach is a recipe for allowing rural communities and islands to wither and die.

If the ambition of NPF4 really is to deliver an increase in rural population and “to produce policies that positively encourage rural development to help repopulate and sustain rural areas through sustainable economic growth” then this will require investment in rural infrastructure to deliver. It will require new infrastructure.

We agree with Scottish Land and Estate’s view that:

“...we believe that the provision of housing in rural areas should be given more weight in the focus of the planning system over infrastructure. An infrastructure-first approach to planning is

likely to negatively impact the provision of housing in rural areas, as the requirement to provide new infrastructure in remote and rural areas will likely increase development costs, further disincentivising developers. Increasing rural populations by a sustainable level in the first instance would make infrastructure projects more economically justifiable. Recognition needs to be given to the difficulty in installing new infrastructure projects in rural areas compared to urban ones.

Furthermore, an infrastructure first approach, especially the concept of upgrading and expanding existing infrastructure, could lead to more urban biased development because it is easier and cheaper to develop around existing infrastructure predominant in urban and fringe areas than it is in rural and remote areas with less existing infrastructure."

Q 31: 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 support a plan-led approach to housing needs and would support the creation of a National Land Agency to provide a land assembly function to enable the strategic development of homes where required.

The current developer led approach to housebuilding will not deliver quality homes unless Building Standards are beefed up to require energy efficient net zero homes. Similarly affordable housing investment which prioritises numbers over quality will also fail to deliver quality homes.

Policy 9(c) states that in rural or island areas authorities are "encouraged to set out tailored approaches to housing which reflect locally specific market circumstances." This needs strengthened and the word 'encouraged' replaced with the word 'should'.

We support the Policy 9(i) allowing exceptions to enable the development of small affordable housing developments but would add that these developments cannot always be foreseen and reference to them in a local authority housing plan will be necessarily vague.

Q 32: DO YOU AGREE THAT THIS POLICY WILL REDUCE THE NEED TO TRAVEL UNSUSTAINABLY, DECARBONISE OUR TRANSPORT SYSTEM AND PROMOTE ACTIVE TRAVEL CHOICES?

Judgement on the sustainability of locations for future development require more subtlety than is proposed within this policy. The ability to travel in a zero emissions vehicle or not to travel due to

remote working opportunities enables a more refined approach to locational sustainability. Particularly when rural locations offer greater opportunities to reduce carbon through the generation of power through solar, heat pumps and geothermal systems and more chance to produce food locally - contributing to energy and food resilience.

Q 33: DO YOU AGREE THAT THIS POLICY WILL HELP US ACHIEVE ZERO EMISSIONS FROM HEATING AND COOLING OUR BUILDINGS AND ADAPT TO CHANGING TEMPERATURES?

Q 34: DO YOU AGREE THAT THIS POLICY WILL HELP TO MAKE OUR PLACES GREENER, HEALTHIER, AND MORE RESILIENT TO CLIMATE CHANGE BY SUPPORTING AND ENHANCING BLUE AND GREEN INFRASTRUCTURE AND PROVIDING GOOD QUALITY LOCAL OPPORTUNITIES FOR PLAY AND SPORT?

Q 35: DO YOU AGREE THAT THIS POLICY WILL HELP TO ENSURE PLACES ARE RESILIENT TO FUTURE FLOOD RISK AND MAKE EFFICIENT AND SUSTAINABLE USE OF WATER RESOURCES?

Q 36: DO YOU AGREE THAT THIS POLICY WILL ENSURE PLACES SUPPORT HEALTH, WELLBEING AND SAFETY, AND STRENGTHEN THE RESILIENCE OF COMMUNITIES.

Q 37: 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 welcome the support for "development proposals for home-working, live-work units and micro-businesses" we have some concerns regarding the clause that suggests that "the scale and nature of the proposed business will be compatible with the surrounding area". Similar clauses have been utilised in past planning policy to limit rural business development to farm and land business. In the 21st Century the rural economy is diverse with people working locally for national and international companies in a huge variety of sectors.

Q 38: DO YOU AGREE THAT THIS POLICY WILL HELP TO INSPIRE PEOPLE TO VISIT SCOTLAND, AND SUPPORT SUSTAINABLE TOURISM WHICH BENEFITS LOCAL PEOPLE AND IS CONSISTENT WITH OUR NET-ZERO AND NATURE COMMITMENTS?

Q 39: DO YOU AGREE THAT THIS POLICY SUPPORTS OUR PLACES TO REFLECT AND FACILITATE ENJOYMENT OF, AND INVESTMENT IN, OUR COLLECTIVE CULTURE AND CREATIVITY?

Q 40: 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 significant opportunity to integrate green energy production with repopulation and rural economy development and it would be good to have support for local production and consumption of energy and micro- grid development more explicitly supported.

Q 41: 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?

Q 42: DO YOU AGREE THAT THIS POLICY WILL SUPPORT INVESTMENT IN AQUACULTURE AND MINIMISE ITS POTENTIAL IMPACTS ON THE ENVIRONMENT?

Q 43: DO YOU AGREE THAT THIS POLICY WILL SUPPORT THE SUSTAINABLE MANAGEMENT OF RESOURCES AND MINIMISE THE IMPACTS OF EXTRACTION OF MINERALS ON COMMUNITIES AND THE ENVIRONMENT?

Q 44: DO YOU AGREE THAT THIS POLICY ENSURES ALL OF OUR PLACES WILL BE DIGITALLY CONNECTED?

We welcome the enabling language around ensuring all available technologies and approaches are supported to improve digital connectivity and futureproof infrastructure.

Q 45: DO YOU AGREE THAT THESE POLICIES WILL ENSURE SCOTLAND'S PLACES WILL SUPPORT LOW CARBON URBAN LIVING?

e) *"The lack of public transport in some rural areas should not preclude small scale retail or service developments, where this would serve local needs. In assessing such proposals planning authorities should take account of the potential impact on nearby town and commercial centres or village/local shops; desirability of providing a service throughout the year; and likely impact of traffic generated and access and parking arrangements"*

The qualification that the development of small scale retail/service developments should take account of the potential impact on nearby towns appears to run counter to the policy of 20 minutes neighbourhoods. Where such development would help reduce the requirement to travel and enhance the creation of a 20 minute neighbourhood should this not be encouraged.

Q 46: DO YOU AGREE THAT THIS POLICY WILL PROTECT AND ENHANCE OUR HISTORIC ENVIRONMENT, AND SUPPORT THE RE-USE OF REDUNDANT OR NEGLECTED HISTORIC BUILDINGS?

No comment

Q 47: DO YOU AGREE THAT THIS POLICY WILL INCREASE THE DENSITY OF OUR SETTLEMENTS, RESTORE NATURE AND PROMOTE LOCAL LIVING BY LIMITING URBAN EXPANSION AND USING THE LAND AROUND OUR TOWNS AND CITIES WISELY?

Policy 29 a) The need of local people for affordable housing in a pressured rural area cannot be met by the development of housing in the greenbelt. This policy seems to suggest that all housing development in pressured rural areas is being created by those moving from urban locations so this pressure can be met by building in the green belt.

We would suggest that the text is modified to be clear that development within pressured rural areas to meet indigenous housing need is to be permitted and cannot be off set to the green belt.

Q 48: DO YOU AGREE THAT THIS POLICY WILL HELP TO PROACTIVELY ENABLE THE REUSE OF VACANT AND DERELICT LAND AND BUILDINGS?

Yes

Q 49: DO YOU AGREE THAT THIS POLICY WILL ENSURE THAT RURAL PLACES CAN BE VIBRANT AND SUSTAINABLE?

No, it is a requirement that NPF4 provides a road map for the delivery of the rural repopulation outcome. However Policy 31 places significant barriers to the achievement of this outcome.

We recognise that there are tensions between the repopulation/repeopling outcome and the environmental/local living outcomes. However the role of NPF4 should be to address these tensions, highlight innovation and provide planners with meaningful guidance on how to make decisions.

We support the Scottish Rural Action proposal that each action area of the Spatial Strategy includes action to **Create a Balanced and Sustainable Rural Population.**

We commend the potential of Smart Clachan to provide a route for the sustainable development of rural housing and to grow the rural population. We would like to see it adopted as a National Development.

We are pleased to see Savills suggest that “the Smart Clachan concept needs to be mainstreamed within NPF4 as a form of development suited to rural areas.” and Scottish Rural Action suggest propose Smart Clachan as the type of small- scale rural settlement patterns which should be supported.

Policy 31(a) requests of planners to identify, in local development plans, “accessible, intermediate and remote areas across the mainland and islands.” What these categories mean is not defined and they are not aligned with the Scottish Government’s Urban Rural Classification System. We would like to see clear definitions provided and clear direction given to local authorities regarding the requirement of NPF4 to grow the rural population.

We support the Scottish Rural Action view that NPF4 should “**emphasise the place principle and incentivise community-led approaches**, so that communities can work with planning authorities to create locally appropriate development proposals”

Policy 31(b) suggests that “Development proposals that support the resettlement of previously inhabited areas should be supported where the proposal is consistent with climate change mitigation targets”.

This is welcome however it requires clarification regarding what a *previously inhabited area* is and what ‘*consistent with climate change mitigation*’ consists of. Would the resettlement of a cleared village in Sutherland (a brownfield site!) be supported and would that support be dependent on the using very low carbon building techniques and on site food and energy production and waste assimilation?

Policy 31(c) - we agree with Scottish Land & Estates that “*Rather than conditions for development, we would like to see a presumption in favour of rural development, or at least some types of vital rural development. It feels counterintuitive to want to repopulate rural areas and bolster their economies when policies feel so strict and conditional. Again, this feels too conditional to make a significant impact on rural populations, especially in areas with housing pressures. We understand the need to carefully consider development in areas of pressure and the desire to avoid suburbanization of the countryside, but these policies feel contradictory to statements earlier in the draft that state NPF4 must help alleviate housing pressures in rural areas where young people and an ageing population are being shut out due to high house prices and second homes etc.*”

Policy 31(d) we agree with Savills that the restriction of development proposals to the diversification of existing business *“only allows scope for the diversification of “existing” businesses” and not for the introduction of new businesses to rural areas. The underlying assumption is that businesses should be directed to urban areas, and yet again this policy bias continues to jeopardise the growth of rural economies and their services”* The population of rural Scotland cannot grow unless new people, new homes and new business is permitted to locate in rural areas.

The welcome proposal to permit *“small scale developments that support new ways of working such as remote working, homeworking and community hubs”* will not be possible if diversification and development is only permitted for existing business.

Policy 31(e) we agree with Savills *“This section is lacking in ambition or innovation and does not absorb the new and exciting concepts which are being developed in rural areas such as Smart Clachan”*

There is no need to put a specific rural qualification regarding redevelopment of derelict land or brownfield.

Policy 31(f) we agree with Savills that this approach to rural planning is outdated

We need a bigger vision for rural Scotland which recognises its ability to contribute significantly to meeting climate change objectives but in a very different way to that of urban areas. And we need our planning policies to actively promote that alternative approach.

In relation to this specific subject of sustainable transport, significant trends in travel and working styles such as electric cars, improvements in rural IT infrastructure and home working are already creating new opportunities to increase the sustainability of rural living.

These trends combined with The Scottish Government and Scottish Futures Trust work to provide superfast broadband which prioritises rural areas, tackling “not-spots” and the roll out of 4 and 5G. will support the growing trend of working from home and the growth of micro and other business opportunities in rural parts of Scotland reducing the need to travel for work.

If NPF4 is to realise its stated objectives to deliver the outcomes in the planning act it needs a vision on how rural depopulation can be reversed and the population increased.

The pandemic offers the opportunity to develop new ways of living and working post COVID19. There is a clear desire amongst people to refocus on community, place, wellbeing, smaller scale and climate-friendly development. The development of housing which offers models for mutual

support - such as co-housing, collective self build and mutual home ownership cooperatives - can create frameworks for these more mind-ful and cooperative forms of living.

Rural areas, in particular, offer opportunities to create housing which encompasses opportunities for local food production, shared working space, renewable energy generation, community heat, mutuality and intergenerational living.

Many people, particularly young people, are looking for a connection with the land, they are looking for somewhere where they can grow their own or buy local food and they want to support local jobs and the environment. Proposals like Smart Cachan offer an opportunity for this

Q 50: DO YOU AGREE THAT THIS POLICY WILL PROTECT AND RESTORE NATURAL PLACES?

We support the submission of Community Land Scotland below:

Policy 32 does not reflect contemporary nature conservation best practice and its implementation has the potential to have significant negative impacts on rural dwellers, including for the individual and community rights for access to housing and for the sustainable development of their local areas.

Contemporary best practice thinking in nature conservation understands conservation as a cooperative balance of natural and human use, not an imposed artificial concept of wildness. There is emerging good practice on this work, such as in Loch Lomond National Park, and a robust system of other nature conservation designations. There is no need for additional planning weight to be given to wild land areas in the NPF4.

32 (i) in its entirety should be deleted.