

## **Savills NPF4 Response: Rural Development**

### **General Points**

Savills is pleased to see Scottish Government's commitment to supporting rural areas to stem depopulation and indeed achieve re-population. We are pleased to see "Re-population of rural areas" as one of the top six outcomes of NPF4.

To this end, Savills (and Inherit) undertook a Research Study on behalf of Scottish Government in 2019 which is an Evidence Base for rural planning policies <https://www.gov.scot/publications/rural-planning-policy-2050-research-inform-preparation-npf4/> and sits within the Transforming Scotland Website in the SPP background papers. Savills would encourage Scottish Government to take on board all of the recommendations of this report in order to achieve the rural repopulation required.

Savills considers that there should be an over-arching presumption in favour of sustaining rural populations in planning policy and decisions.

Savills also considers that the amalgamation of NPF and SPP creates an opportunity for Scottish Government to re-visit the rural development policies contained in Scottish Planning Policy 15. The strength and thrust of these policies have become diluted over the years since all Planning Policies were condensed into one SPP.

In this regard we endorse the consultation responses of Scottish Land and Estates and Rural Housing Scotland.

Specifically we consider that there should be:

### **Rural Housing**

Flexible and enabling policies regarding housing.

Support for the provision of rural affordable housing subsidised by consent for market housing either on the same site or in a separate location where the financial returns would be greater.

Planning should rely more on fine-grained approaches in rural areas which can identify untapped housing demand, and place less reliance in these areas on traditional measures of need and demand.

There is more scope for small-scale housing development including clusters and groups in close proximity to settlements, replacement housing, and plots on which to build individually designed houses in rural Scotland. This should be expressed in the development plans, either as part of a general settlement policy or as a separate sub-set on rural housing policy.

**Entry level exception sites** could provide entry level homes suitable for first-time buyers (or equivalent, for those looking to rent). They can be suitable:

- Be suitable for first-time buyers
- Be on land not allocated for housing
- Be adjacent to existing settlements and be no larger than 1 ha in size or exceed 5% of the size of the existing settlement and comply with local design policies and standards
- Comprise of entry-level homes that offer one or more types of affordable housing (being affordable housing for rent, starter homes, discounted market sales housing or provide other affordable routes to home ownership)

- Entry Level Exception Sites should not be reliant on a shortfall being demonstrated in a Local Authority's 5-year housing supply. Instead, they should be focussed around a lack of housing suitable for first-time buyers or renters in the area, which is an issue that is particularly acute in rural locations.

### **Succession housing for rural businesses.**

Agriculture has an ageing workforce in Scotland and the transfer of business control and ownership to the next generation is one of the most critical stages in the development of the business. We consider that national planning policy should explicitly recognise that building a new home in the countryside is justified when it will enable a farmer to retire and transfer a farm to the next generation.

Having a home on the farm for the retiring farmer to move into would enable the retired farmer to continue to provide advice and support. It would also enable a farming family to provide care for an elderly farmer. Brexit and the change it will bring to the agricultural sector may be the catalyst for many farmers to retire. Having positive policies that remove barriers to this is a sensible step to take at this time.

Supporting new entrants into farming and providing a way for older farmers to stay on the land preserves an intergenerational connection on a farm. It provides important benefits such as helping to build responsibility for the land and retaining location specific information and how to deliver effective agricultural and environmental management.

It is important to note that the intention of this proposal is not to provide every farmer with an automatic right to build an additional property on their land when they retire. The intention is to minimise exposure to existing barriers at local level where the need arises. This is highlighted in a recent CAAV report "Retirement Housing for Farmers in the United Kingdom: A review of the issues, experiences and possible answers" which notes that the issue of housing concerns can lead the occupier to remain farming long into old age, with the potential for increasing infirmity.

### **A Nuanced Rural Approach to Rural Sustainability**

Access to vehicles is the only way to ensure many of Scotland's remote rural communities are sustainable. If public transport is not viable, making these journey's carbon neutral should be a priority for Scottish Government/local authorities. We suggest planning authorities implement strategies for a rural first approach to roll-out of electric vehicle charging infrastructure.

Accessibility to public transport cannot be a binary test as to whether housing can be built in a village or town. (Thinking about sustainability in this manner would remove the restrictive policy in paragraph 81. of the current SPP which seeks to prevent "unsustainable" growth in long-distance car-based commuting).

### **Rural Place Based Approaches**

NPF4 should imbed place-based approaches specific to rural areas and Local Place Plans should be supported with appropriate resources and capacity building.

Some parts of Scotland's valued environments (natural & cultural heritage etc.) can accommodate certain types of development, where it can be demonstrated that there will be no adverse environmental impact or where it can be demonstrated that there will be net-gain in biodiversity.

Positive policies on rural design should be prepared building on themes such as landscape character, village plans and design statements.

NPF4 should offer explicit encouragement to using place sensitive approaches to settlement, which determine the development of existing and new settlements in response to the particular challenges, needs and opportunities of different areas

**Local Place Planning** and use of **Masterplan Consent Areas** to select housing sites which work best for the community, landowner and place. These should not solely focus on settlements and clustered communities but could also be used at a wider landscape scale.

**Area Capacity Evaluations** should be used by Planning Officers to assess applications for housing in the countryside (single houses and clusters) based on balancing a range of factors including landscape capacity, settlement pattern, social and economic need and a presumption in favour of sustaining populations in rural areas.

### **Green Belt Policy**

A review of Green Belt policy and its effectiveness particularly in the light of climate change. The requirement to review Green Belts on a regular basis against a series of performance targets should be written into NPF4.

### **Visitor Accommodation and Facilities**

Where local authorities recognise a need for holiday, weekend and second homes in their area, in recognition of the significant economic role that they can play, planning authorities should provide supportive policies and in some cases allocate land in their development plans to help meet demand. Policies should support small scale development on existing properties to enable local people to have the additional income that a self-catering facility could provide without taking housing out of the mainstream housing market.

Provide guidance to local authorities on supporting and managing the development of tourism facilities and infrastructure, and on balancing the need to ensure there is adequate and appropriate housing for rural populations.

Expansion of the support for hutting already set out in Scottish Planning Policy and we would like to see a stronger requirement for planning authorities to reflect this national support for hutting in their policies, guidance and decisions.

### **Rural Economy**

Planning and other policy areas impacting on land-based industries should support their viability wherever possible.

### **Developer Obligations in Rural Areas**

Local authorities should be encouraged to minimise and/or cap developer obligations based on the micro economic context of specific rural areas within their administrative boundary. This is to reflect the fact that there is 'market failure' across much of rural Scotland. In towns where there may be a need and demand for private affordable homes, housebuilders and developers are not delivering due to viability concerns and uncertainty surrounding Developer Contributions, which inevitably prohibits the supply of new homes.

Policies relating to steading conversion should consider removing any developer obligation requirements such as education and affordable housing etc. as these can damage viability of such development significantly given the considerable extra expense involved in these conversions and the limited market for them. The conversion of steadings does enable important parts of our rural cultural heritage to be preserved for future generations with a new purpose.

### **Rural Road Standards**

Road standard requirements in rural areas need to be proportionate and sensitive to the location, site and viability. They should not impose urban requirements on rural developments.