

The National Planning Framework 4 and Rural Planning

RTPI Scotland Thinkpiece

RTPI Scotland has produced a series of thinkpiece papers to stimulate discussion and debate on topics areas which we will feel need further exploration to support Scottish Government to develop and advance proposals to improve the planning system. We welcome comments and views either direct to scotland@rtpi.org.uk or on social media using the hashtag #rtpithinkpieces.

This thinkpiece looks at how the planning system can support rural planning across a number of key thematic areas including:

- Rural repopulation
- Housing
- Infrastructure
- Rural economic development
- Renewables
- Transport
- Landscape and land-use policies
- Local Place Plans
- Skills and resources

Introduction

Rural communities in Scotland face many challenges in the 2020s, planning plays a fundamental role in addressing these challenges and supporting the future development of rural Scotland. RTPI Scotland has produced this thinkpiece with the aim of providing workable ideas for the drafting of NPF4 regarding rural planning policy, informing and shaping wider government plans and strategies and to identify corporate priorities for RTPI Scotland moving forward. To produce this work RTPI Scotland has evaluated approaches to rural planning policy across England, Wales and Ireland whilst drawing upon a wide range of recently published research.

The National Planning Framework 4 (NPF4) is a long-term plan for Scotland to 2050. The NPF4 will hold a key role in developing and sustaining vibrant rural, coastal and island communities. Whilst RTPI Scotland believes that every policy within the NPF4 should be “rural-proofed”, we also support the need to continue the production of a suite of rural policies. Rural Scotland is very diverse in context, therefore national policy needs to allow enough flexibility to consider the differing local circumstances and needs of communities. This may also necessitate a change in the different typologies and classifications used to describe Scotland’s rural areas, with the 8-fold Scottish Government Urban Rural Classification amended to include SPAs and island communities. Research into the adoption of Scottish Planning Policy (SPP) in Local Development Plans (LDPs) has confirmed the high uptake of the SPP Subject Policy Promoting Rural Development, with the majority of planning authorities having a rural



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element. It was also highlighted as one of the policies most needing local flexibility to reflect the different priorities of rural localities¹.

The NPF4 will also have to radically address climate change and prioritise emissions reductions. This will build on the Climate Change Plan, take forward advice from the UK Climate Change Committee and take forward recommendations of the Just Transition Commission. The NPF4 Position Statement sets out intentions to plan for net-zero emissions through supporting delivery of future places that reduce the need to travel, better integrate land-use and transport planning, support nature-based solutions, increase energy efficiency of buildings, deliver infrastructure to reduce emissions and actively facilitate decarbonised heating and electricity generation and distribution². In a rural context, prioritising emissions reductions could pose specific challenges and opportunities, which will be addressed throughout this thinkpiece.

The overall success of NPF4 will rely on its relationships to and its sense of fit with other overarching strategies and policies. The NPF4 must have regard for any Land Rights and Responsibilities Statement or any strategy for land ownership or use prepared by Scottish Ministers, the Land Use Strategy, the National Marine Plan and any national strategy and action plan for housing. These plans and strategies will be especially important in a rural context and alignments with the NPF4 will need careful consideration. More widely the ongoing implementation of the Planning (Scotland) Act 2019 through drafting secondary legislation and guidance, provides further opportunities for the planning system to better support rural development.

Repopulation

Many rural areas in Scotland are facing significant demographic challenges in terms of population decline, especially that of working aged people. This demographic challenge is not evenly experienced across rural Scotland, differing between local authorities and typically more so in Sparsely Populated Areas (SPAs) than small towns and accessible rural areas³. However, the COVID-19 pandemic and the resulting move towards a greater proportion of people working from home has created new opportunities to increase the sustainability of rural populations.

As set out in the Planning (Scotland) Act 2019 one of the six outcomes of the NPF4 is to increase the population of rural areas of Scotland and in its preparation, the Framework is to have regard to the desirability of resettling rural areas that have become depopulated. The Scottish Government's NPF4 Position Statement sets out the clear intention to produce policies that positively encourage rural development to help repopulate and sustain rural areas through sustainable economic growth. Within the Planning (Scotland) Act 2019, LDPs are to consider the extent to which there are rural areas within the district in relation to which there has been a substantial decline in population. To achieve this RTPI Scotland wish to see clear guidance provided for planning authorities as to the most effective way of identifying fragile communities. This could, for example, be achieved through utilising Small Area Population Estimates (SAPE) produced by National Records of Scotland (NRS) to established annual population change. Furthermore, RTPI Scotland considers that it is vitally important that an appropriate policy be considered for inclusion in NPF4 relating to sustainable rural growth in a similar manner to the policy set out in the Ireland 2040 National Planning

¹ Scottish Government (2019) Adoption of Scottish planning policy in local development plans: research. October. Available here: <https://bit.ly/2VcMEr0>

² Scottish Government (2020) Fourth National Planning Framework: position statement. November. Available here: <https://bit.ly/398Pssa>

³ The James Hutton Institute (2018) Demographic change in the Sparsely Populated Areas of Scotland (1991-2046). Available here: <https://bit.ly/3ii1QM8>

Framework Policy 4.3 “Planning for the Future Growth and Development of Our Rural Fabric⁴.

Placemaking is a process of creating quality places that people want to be in. Rural placemaking therefore could have an important role in supporting rural repopulation. Research into the adoption of SPP in LDPs has recommended greater emphasis on placemaking at the forefront of development¹. It recognised a need for more direction in ensuring principles are implemented with planning policy becoming more prescriptive to ensure that placemaking principles are carried through to development management. Given this RTPI Scotland believes the NPF4 should be more prescriptive to ensure that placemaking principles are carried through to development management and that clear consideration be made to what constitutes quality rural placemaking.

Housing

The availability of affordable housing is a fundamental factor for sustaining rural communities. The planning system has a key role in supporting the delivery of affordable housing that both reflects diverse housing and accommodation needs for rural communities and supports quality placemaking. However, securing high proportions of developer contributions in terms of affordable housing is difficult in some rural areas due to higher construction costs, even with the availability of grant funding⁵. Furthermore, concentrated patterns of land ownership in rural areas can increase land prices, slow development and reduce the quality of placemaking⁶. This merits the development of housing policies tailored to rural areas where such development can be transformational in terms of economic and societal need. Planners must however balance the need for rural housing, with the need to direct the majority of housing growth to existing key settlement areas due to social sustainability, resource efficiencies and net zero carbon ambitions. Respondents to the research of adoption of SPP into LDPs found paragraphs 76 and 81 very useful in this regard¹.

There is however a range of potentially enabling planning policies that could be included in the NPF4 or set out in LDPs to account for local circumstances:

- Increased affordable housing contributions in rural housing hotspots, with an associated clause accounting for viability, amending wording to SPP policy 129.
- Influencing scale and tenure of housing to discourage second homes. Seeking a greater mix of house types and sizes, with an emphasis towards smaller homes in new developments which are better targeted at working households.

Some have argued that the planning system can be overly protective in rural areas, and a general lack of effective housing land constraining supply thereby placing upward pressure on house and land prices in hotspots⁷. However, there is no consensus on this viewpoint with a recent survey of small housing developers placing land availability low in terms of current or expected future issues⁸. An overly generous land supply can create uncertainty about where homes will be built in a community and could impact on

⁴ Government of Ireland Policy (2018) Ireland 2040 Our Plan National Planning Framework. February. Available here: <https://bit.ly/3nBvdvM>

⁵ Scottish Government (2021) Planning - the value, incidence and impact of developer contributions: research. July. Available here: <https://bit.ly/3ClqdQS>

⁶ Scottish Land Commission (2021) Legislative proposals to address the impact of Scotland’s concentration of land ownership. February. Available here: <https://bit.ly/3ys8KEg>

⁷ Scottish Land Commission (2020) The Role of Land in Enabling New Housing Supply in Rural Scotland. July. Available here: <https://bit.ly/2Vopbmh>

⁸ Scottish Government (2020) Challenges facing small housing developers: survey. January. Available here: <https://bit.ly/2TS2Ltc>



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infrastructure and service delivery. In rural areas, there tends to be a greater quantity of available land, but demand for development is lower. This can result in a significant proportion of the housing delivered through windfall sites. SPP has support for non-site specific policies in rural areas, where the significant unmet local need for affordable housing has been shown, where it may be appropriate to introduce a 'rural exceptions' policy which allows planning permission to be granted for affordable housing on small sites that would not normally be used for housing, for example, because they lie outwith the adjacent built-up area and are subject to policies of restraint. Whilst no recent research on this specific policy has been undertaken in Scotland, research on a similar policy in Planning Policy Wales conducted by RTPI Cymru found it to be a useful tool for the delivery of local needs affordable housing⁹.

RTPI Scotland believes that consideration should be made to updating the rural housing exception policy in SPP 131 for its inclusion in the NPF4. This may include, for example, the acceptance of some market housing to cross-subsidise affordable housing on exception sites, if meeting certain criteria, as seen in the English National Planning Policy Framework (NPPF) policy 78. Such exemptions could be more prescriptive in terms of settlement proximity and conforming with criteria similar to what is set out in Welsh Planning Policy 4.2.34, NPPF policy 80 - excluding 80(e) - or the Cairngorms National Park Authority LDP 2021 policy 1.6. In accessible rural areas, RTPI Scotland agrees with the findings from the research on SPP adoption in LDPs that whilst SPP policies 81 & 82 are useful they may require more clarity to enable a more consistent and specified approach to accessible rural housing. RTPI Scotland believes there is scope for some specific work to be done to develop more sophisticated thinking about how rural areas can better absorb development into the landscape with more emphasis on well sited and well-designed rural development.

Housing Land Audits (HLAs) are an important means for measuring whether housing land supply satisfies the minimum five-year requirement as set out in policy. The HLA process may be adapted to suit local circumstances in rural and remote areas, where the Housing Land Requirement (HLR) and market activity may be of a more limited scale. Research into HLA consistency and compliance, the potential for standardisation and their role in development plan delivery revealed that further guidance into marketability and programming in rural areas would be advantageous¹⁰.

Infrastructure

To increase the number of affordable and the quality of rural homes, whilst meeting net zero carbon targets, the Scottish Government needs to integrate and invest in infrastructure. This will empower the public sector to provide more of an enabling role in site delivery through adopting the 'infrastructure first' approach. The Scottish Government's Infrastructure Investment Plan 2021-22 to 2025-26 has made a specific commitment to regenerating areas of working-age population decline particularly in rural areas through investing in rural housing and better local delivery of services¹¹. Planning can integrate and coordinate this activity. In Ireland, the Irish National Planning Framework 2040, Policy Objective 17b has committed to developing a programme for 'new homes in small towns and villages' with local authorities, public infrastructure agencies such as Irish Water and local communities, to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages³. Furthermore, Planning Policy Wales 11 policy 3.62 and 3.63 provide

⁹ RTPI Cymru (2019) Rural Exception Site Policy in Wales. January. Available here: <https://bit.ly/3imw5Bw>

¹⁰ Scottish Government (2019) Research Project: Housing Land Audits. January. Available here: <https://bit.ly/37iQukM>

¹¹ Scottish Government (2021) A National Mission with Local Impact: Infrastructure Investment Plan for Scotland 2021-22 to 2025-26. February. Available here: <https://bit.ly/3CcVQw7>

a policy steer for planning authorities regarding rural infrastructure encouraging collaboration between planning authorities and key infrastructure providers and locating developments that are well serviced by existing or planned infrastructure considering net zero carbon ambitions¹². RTPI Scotland advocates for a similar policy approach to rural infrastructure to be taken in the NPF4 as seen in the Irish NPF and Welsh Planning Policy.

Self-build housing is a significant delivery mechanism for rural housing. In rural areas with weak demand, a range of tenure options, including self-build can spread risk and improve viability. Generally however, this has been more successfully implemented in the community sector than the private sector⁴. The provision of more serviced self-build plots could help unlock and cross-fund developments. The Planning (Scotland) Act 2019 contains two new provisions connected with self-build including the duty for planning authorities to publish a list of persons seeking land for self-build housing and a provision to include self-build within Masterplan Consent Areas (MCAs), further regulations for which still to be consulted upon. Planning Policy Wales policy 4.2.13 instructs planning authorities when allocating sites to consider providing a range of sustainable and deliverable sites, to allow all sectors and types of housebuilders including self-build. Furthermore, Planning Policy Wales policy 4.2.15 supports the promotion of self-build through Local Development Orders and site-specific design codes. RTPI Scotland recommends a similar policy approach in Scotland where there could be an opportunity to use MCAs to create master-planned, serviced and platformed opportunity sites on public land to encourage self-build rural housing and rural housing more broadly. Note that this is similar to an approach taken by Glasgow City Council in Maryhill, where the council provided serviced plots with a design code as well as a “plot passport” approach to planning to support potential applicants.

Rural economic development

The COVID-19 pandemic has demonstrated an opportunity to redistribute jobs to more remote rural areas as part of a wider strategy to support rural repopulation. The NPF4 Position Statement set out a range of policy objectives concerning the rural economy which RTPI Scotland is broadly supportive of, including:

- Improving digital connectivity
- Supporting rural investment and diversification
- Supporting food and drinks sector
- Supporting sustainable tourism development
- Building more space for people to work remotely and creating community hubs
- Providing greater flexibility for housing development that provides accommodation for rural businesses including temporary accommodation for tourism workers

To support rural economies RTPI Scotland wishes to see the continued promotion of the development of the digital fibre network, a national development in NPF3 as a national development in NPF4. RTPI Scotland also advocates for a policy similar to NPPF para 89 where the sequential town centre first approach adopted in development plans should not be applied to applications for small scale rural offices or other small scale rural developments.

Renewables

Rural Scotland has significant renewable energy resources, both onshore and offshore. At a strategic and local level, planning has a key role to play in identifying, developing

¹² Welsh Government (2021) Planning Policy Wales, Edition 11. February. Available here: <https://bit.ly/2Ve8Scd>



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and approving suitable developments, integrating and empowering key stakeholders, enabling rural communities to deliver low carbon, resilient and affordable energy networks. RTPI Scotland understands that renewable developments can pose a particular challenge balancing the need to protect Scotland's landscape quality and peatlands and the need to deploy sufficient onshore wind to meet net-zero targets. RTPI Scotland would like to highlight the crucial role that Strategic Environmental Assessments (SEAs) play in underpinning a plan-led approach to renewables as a systematic method for considering the likely environmental effects of renewables and by facilitating openness and transparency of decision-making. RTPI Scotland recommends the continued policy support for community owned energy in fragile communities.

Transport

The integration of transport and land use planning will be essential in achieving net-zero targets and supporting the social and economic sustainability of rural communities. The opportunity to reduce car use and increase walking, cycling and use of public transport is more limited than in urban areas. Therefore, beyond targeting development to existing settlements that have relatively good accessibility by active or public transport as previously discussed, more tailored policy proposals may be necessary for rural communities. Whilst SPP has a well-established policy steer in terms of promoting sustainable transport and active travel, research has shown difficulties in stakeholders meaningfully applying the policy, especially at a large scale in a rural context¹. Some have therefore called for a shift away from policies that require rural housing development to be located at sites that are accessible by public transport or expressed concern that lack of development in settlements hampers the potential viability of public transport¹³.

For the foreseeable future car use is likely to be the primary form of transport in rural Scotland, therefore in order to meet net-zero target ambitions, electric vehicle charging infrastructure will need considerable investment. This could prove challenging in a rural context where the provision of charging points may be disadvantaged by a market-driven charging system. In the NPF4 Position Statement, the intention was set out to remove the need for planning permission for active travel and electric vehicle charging points to ensure the faster roll-out of the new infrastructure. Beyond removing the need for planning permission, stronger policy support for charging points in new developments similar to Welsh Planning Policy 4.4.41 could be helpful to further encourage or mandate EV infrastructure deployment.

There is still considerable opportunity to deploy active travel infrastructure in rural locations, rural authorities can struggle to produce competitive bids for funding lengthy active travel network extension proposals which serve relatively small populations. RTPI Scotland has promoted large scale improvements to active and sustainable transport networks across Scotland as a national development in NPF4¹⁴. We believe the delivery of a national network of walking and cycling will support the sustainable development of rural communities and job creation in the rural economy through tourism opportunities. RTPI Scotland believes there is still the opportunity to encourage active travel within key rural settlements, through principles of the 20-minute neighbourhood concept¹⁵. Rural communities can also benefit from mobility hubs which are transport centres that offer different and connected sustainable and active transport modes supplemented with enhanced facilities, such as embracing multi-functional parcel collection centres, wi-fi

¹³ Scottish Government (2021) Research Project: Scotland's Fourth National Planning Framework Position Statement – Analysis of responses to the consultation. June.

Available here: <https://bit.ly/37z4ozr>

¹⁴ RTPI Scotland (2020) 10 Big Ideas for National Planning Framework 4. June.

Available here: <https://bit.ly/3jo8qbH>

¹⁵ RTPI Scotland (2021) Implementing 20 Minute Neighbourhoods in Planning Policy and Practice. March. Available here: <https://bit.ly/2VqXBVL>

enabled hotspots and information features. RTPI Scotland believes that the NPF4 should provide policy support for mobility hubs in rural areas.

Landscape and land use policies

For many rural planners, there is a close interaction between landscape management and the planning system, with collective decisions on infrastructure and development greatly impacting upon wider landscapes over time. However, from a policy perspective 'rural land use' has often been approached separately from spatial planning and regional economic planning. A review of international land use plans has shown better alignment and integration of these sectors may lead to greater efficiencies and better outcomes¹⁶. The Planning (Scotland) Act 2019 supports the notion of the planning system as a key player in integrating land use stating that: "The purpose of planning is to manage the development and use of land in the long-term public interest". Moving forward the NPF4 will need to align with a wide range of policies relating to rural development with the NPF4 Position Statement setting out the need to closely align planning with the Land Use Strategy, Regional Land Use Partnerships, the National Islands Plan, the Forestry Strategy, the Rural Economy Action Plan and the Land Rights and Responsibilities Statement. The NPF4 Position Statement also sets out intentions to strengthen policies designed to protect and restore Scotland's biodiversity and natural assets and support Nature Based Solutions to sustain and grow rural communities. It also states that consideration will be made to whether area-based environmental transformation projects and/or green and nature networks should be promoted as national developments.

In agreement with the Scottish Land Commission's advice to the Scottish Government, RTPI Scotland believes that it is necessary to make a clear link between Regional Spatial Strategies (RSSs) and Regional Land Use Partnerships¹³. This could help integrate spatial planning with natural capital/ecosystems approaches to identifying potential landscape scale land use changes. Such approaches may allow, for example, better regional understanding and coordinated action on issues such as flood storage and coastal flooding. Regarding the coastal interface, which is a key consideration for much of rural Scotland, RTPI Scotland would like to highlight the opportunity to provide better alignment between the NPF4, RSSs, the National Marine Plan and Marine Planning Partnerships (MPPs).

Local Place Plans

Local Place Plans (LPPs) were introduced as a provision in the 2019 Planning (Scotland) Act. They are a new type of plan providing opportunities for communities to develop proposals and ideas for the development of where they live. Linked to the NPF4 and LDPs, LPPs can help community planning and land-use planning achieve better outcomes for communities. If combined with a rigorous site assessment process to make sure the land is suitable for development, LPPs have the advantage of being developed at a more granular level with local community buy-in about the types of development that are needed and the best locations for the proposals.

Developing from the community empowerment agenda rural Scotland has a rich and successful history of community-led planning and placemaking through, for example, the establishment of development trusts and community-led housing initiatives¹⁷. In England, research has shown the equivalent form of community-led plans known as Neighbourhood Plans have had a significantly higher uptake in rural areas¹⁸. Therefore, the effective establishment of LPPs could potentially have a significant positive impact on

¹⁶ Scottish Land Commission (2020) Advice to Scottish Government on the establishment of Regional Land Use Partnerships. November. Available here: <https://bit.ly/2TWkxM1>

¹⁷ Community Land Scotland (2020) Home Delivery Community Led Housing in rural Scotland. November. Available here: <https://bit.ly/3AgsBHO>

¹⁸ Parker, G and Salter, K. (2017) Taking stock of neighbourhood planning in England 2011– 2016, Planning Practice & Research, 32(4): 478-490.



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rural communities. In response to the ongoing development of LPP regulations and guidance RTPI Scotland has called upon the Scottish Government to provide dedicated resources for planning authorities to support LPPs, ideally through creating dedicated planning officer roles or through support provided by a national body that can facilitate local links. To support communities to produce LPPs, RTPI Scotland has called upon the Scottish Government to establish a national grant scheme for communities as has been established in England to support Neighbourhood Plans.

Skills and resources

Research commissioned by the Scottish Land Commission into the role of land in enabling new housing supply in rural Scotland has highlighted the need to increase the resource and capacity available to facilitate more rural housing development across all sectors⁶. Planning services have been severely impacted due to budget cuts in recent years. This lack of resourcing has been recognised by a range of stakeholders including business organisations such as CBI Scotland, Scottish Chambers of Commerce and Scottish Renewables¹⁹. Planning also has demographic and succession challenges with a limited pipeline of planners. Data gathered from planning authorities' Planning Performance Frameworks indicate that only around 9% of staff in planning authorities are under 30 whilst over 35% are over 50 years old. Research commissioned by Skills Development Scotland for Partners in Planning outlined increased future demand and highlighted that the majority of planners needing to be replaced will be senior and more experienced planners, potentially creating a knowledge gap within the profession as this expertise and experience is lost. Over the next 10 to 15 years the planning sector will have demand for an additional 680 - 730 entrants into the sector (comprised of 550 - 600 replacement demand and 130 expansion demand). The research identified the public sector as likely to be most severely affected and it is anticipated that there will be some regional variances with rural areas and those with no/limited connections to the planning schools as likely to face greater challenges²⁰.

Resultingly, RTPI Scotland calls for greater investment in initiatives to promote planning as a career and the creation of a planning apprenticeship programme. The potential establishment of a planning apprenticeship programme could be particularly beneficial for rural employers where a 'grow your own' approach could be made to improving the pipeline of planners with the option of day release to distance learning planning courses. The previously mentioned commissioned research by the Scottish Land Commission has further called for the development and roll-out of a rural training package to local planning authorities, an option RTPI Scotland can help explore, alongside encouraging rural based universities to adapt current courses to include spatial planning modules, with future ambitions of potential accreditation.

¹⁹ RTPI Scotland (2021) Resourcing the Planning Service: Key Trends and Findings 2021. June. Available here: <https://bit.ly/3s5h4Yc>

²⁰ Skills Development Scotland (SDS), Partners in Planning & EKOS (2021) Skills in Planning Publication. February. Available here: <https://bit.ly/3pe8LrA>