

19 April 2004

Ms Kerryn Hurley  
Scottish Executive Development Department  
Planning Division 1-2  
Area 2-H (B)  
Victoria Quay  
Edinburgh EH6 6QQ

Dear Ms Hurley

**Consultation on Draft Scottish Planning Policy (SPP) Planning for Rural Development**

Further to Mr Ian Duncan's letter of 28 January 2004, Homes for Scotland is grateful for the opportunity to comment on the consultative draft of SPP Planning for Rural Development.

Homes for Scotland is the representative membership body for the home building and residential development industry in Scotland. Our member companies build over 80% of all new homes in Scotland and the industry is the largest user of the planning system in Scotland. Accordingly, I am pleased to present our general observations as follows:

Homes for Scotland finds the SPP Planning for Rural Development generally favourable. However, although this draft refers to SPP3 re Affordable Housing, it does not acknowledge the need to prepare Long-term Settlement Strategies for rural communities.

The problem of infrastructure constraints is currently one of the major impediments to any form of development in rural Scotland. There is therefore as much a requirement to address this issue as elsewhere in Scotland. We have a plan led system which will require Long-term Settlement Strategies to be developed in order that the necessary investment can be planned both by the public and private sector.

Drainage in particular requires to be planned and innovative solutions delivered. Unfortunately, there will seldom be sufficient scale in rural areas to justify certain of the solutions being developed in the urban areas. SEPA will require to be involved with Scottish Water to accept different solutions involving small sewage treatment works that are acceptable in other rural areas in other countries. The current approach by SEPA will require to be reviewed if rural development is to take place in many parts of Scotland. The Q&S 2 review has identified many areas of constraint in rural areas. Q&S3 will not identify any investment being available to address development constraints up to 2013.

Practical solutions require to be found in the meantime to permit development to occur in rural areas.

Homes for Scotland welcomes the initiative to encourage a range of housing opportunities in rural areas. The reuse of derelict structures should also be encouraged. Lifestyle linked to the need to improve the work life balance will continue to generate a demand for a range of housing opportunities in rural areas. The demand for holiday homes and second homes reflects the growing affluence of certain sections of society. The provision of such accommodation should be welcomed providing there is a balance and a range of housing is encouraged.

Regarding Affordable Housing the recognition that land should be allocated for this use is welcomed. Consideration should be given to a separate land use category to safeguard such requirements. It would be possible to identify such uses in a Long – term Settlement Strategy. The provision of Affordable Housing requires to be separately addressed in detail in separate guidance and not as stated in paragraph 19.

The recognition that all forms of residential development generates considerable investment and employment is welcomed. The recent Barker Report confirmed this point and provides considerable evidence of the level of such benefit. Conversely one of the most damning outcomes of this body of work is the clear statement that the undersupply of housing constrains economic growth. This applies as much in rural areas as elsewhere in Scotland.

I trust that the above comments are helpful and would be happy to provide additional comment on any matter dealt with in this letter if this would be of further assistance.

A completed responsee information form is also enclosed and I confirm that we have no objection to our comments being made publicly available.

Yours sincerely

Allan Lundmark  
Director of Planning & Communications