

Response ID ANON-R3K1-FRB4-F

Submitted to **Proposed programme for reviewing and extending permitted development rights (PDR) in Scotland**

Submitted on 2020-01-24 11:32:36

The Scottish Government's Proposed Programme for Reviewing and Extending Permitted Development Rights (PDR) in Scotland

1 Do you have any comments on the proposed Work Programme, including the proposed phasing and groupings?

Please provide any comments. :

RTPI Scotland notes that further work regarding town centre changes of use is not anticipated to begin until Autumn 2020. Given the importance of town centres as a socio-economic issue across Scotland the Institute urges the Government to ensure that this work is taken forward as quickly as possible alongside other work streams, and particularly the preparation of National Planning Framework 4.

2 What are your views on the accuracy and scope of the information described in the Sustainability Appraisal report as regards:

a) environmental baseline?:

No comment.

b) social baseline?:

No comment.

c) economic baseline?:

No comment.

3 What are your views on the predicted effects set out in the Sustainability Appraisal report as regards:

a) environmental effects?:

Agricultural and rural – impact of isolated residential dwellings

RTPI Scotland notes that the SA largely identifies potential negative effects of applying PDRs to the conversion of farm steadings to residential use. Extensive conversions of farm steadings to homes could undermine the Government's commitment to cutting carbon emissions and a town centre first approach to development. The Institute acknowledges the importance of supporting the rural economy, and does not discount that such conversions can be appropriate. We believe however that the SA makes the case for retaining full local control over such conversions. This doesn't preclude against using policy to support provision of appropriate rural housing.

b) social effects?:

Town Centres

RTPI Scotland urges caution with regard to the possible expansion of PDRs in town centres. The SA makes clear the socio-economic challenges that Scotland's town centres are facing. With regard to the possible introduction of PDRs for converting commercial uses to residential, there are important lessons to be learned from England, where such a system has been in place since 2013. Because such conversions are exempt from the full local planning process there is no control over the type or quality of housing delivered. In addition, because the conversions are PDRs, local authorities are unable to secure a planning gain contribution through the English s.106 system towards new affordable housing. The Local Government Association has estimated that as a result around 10,000 much needed potential new affordable homes have not been secured.

3c) economic effects:

Town Centres

In addition to serious concerns about the negative social impacts of applying PDRs to commercial to residential conversions, RTPI Scotland notes that successful town centre regeneration normally depends on proactive and collaborative policy making and implementation. There are many examples throughout Scotland where local authorities, communities and businesses have worked together on long term projects to improve the economic and social viability of town centres. Conservation Area Regeneration Schemes have often played an important role in these alliances. RTPI Scotland believes that applying wider PDRs generically to town centres could undermine such efforts, and result in more ad hoc and uncoordinated changes.

The Institute suggests that instead the possibility of introducing a 'town centres use class' to the Use Classes Order could be explored instead. This could sit well alongside work on how to most effectively regulate short term lets, and would give an opportunity to look in more detail at balancing flexibility for town centre occupants with proactive efforts to improve the sustainability of Scotland's town centres and high streets.

4 What are your views on the findings and the proposals for mitigation and monitoring of effects set out in the Sustainability Appraisal report with regard to:

Please provide any comments. :

No comment.

a) environmental baseline?:

No comment.

b) social baseline?:

No comment.

c) economic baseline?:

No comment.

5 Do you have any other comments on the Sustainability Appraisal report?

Please provide any comments. :

No.

About you

What is your name?

Name:

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

RTPI Scotland

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: