

**APPEAL UNDER SECTION 43A (8) OF THE TOWN AND COUNTRY PLANNING
(SCOTLAND) ACT 1997
TOWN AND COUNTRY PLANNING (SCHEMES OF DELEGATION AND LOCAL REVIEW
PROCEDURE) (SCOTLAND) REGULATIONS 2013**

Land North East Of Runningburn Farm Stichill - 22/00575/FUL and 22/00039/RREF

Comments of the Planning Officer in respect of NPF4

This pattern of development is not supported in NPF4.

NPF4

Scotland's Fourth National Planning Framework (NPF4) was approved by the Scottish Parliament on 11 January 2023 and is due to be adopted by Scottish Ministers on 13 February, at which point, it will be a component of the statutory development plan of this and every other planning authority in Scotland. The Scottish Government has advised that in the interim, NPF4 must be considered a significant material consideration within all planning decisions.

NPF4 Policies that are considered to be relevant to this decision are Policy 1, Policy 2, Policy 14, Policy 15, Policy 18, Policy 29 and Policy 30.

Policy 1 requires that when considering all development proposals, significant weight should be given to the global climate and nature crises. According to the policy intent, this is to encourage, promote and facilitate development that addresses the global climate emergency and nature crisis.

Policy 2 requires that development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible, and to adapt to current and future risks from climate change. According to the policy intent, this is to encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change.

Policy 14 seeks to encourage, promote and facilitate well designed development that makes successful places whether in urban or rural locations by taking a design-led approach and applying the Place Principle. This includes ensuring that development is well connected to reduce car dependency; is in keeping with the built and natural environment of the surrounding area; and takes account of the need to use resources efficiently and ensure climate resilience. Conversely, development proposals that are poorly designed and detrimental to the amenity of the surrounding area will not be supported.

Policy 15 requires that consideration be given to the existing settlement pattern, and the level and quality of interconnectivity of the proposed development with the surrounding area, including local access to everyday facilities. The underlying intention is to create connected and compact neighbourhoods where people can meet the majority of their daily needs within a reasonable distance using green and/or sustainable transport options.

Policy 18 seeks to encourage, promote and facilitate an infrastructure first approach to land use planning, which puts infrastructure considerations at the heart of placemaking.

Policy 29 seeks to encourage rural economic activity, innovation and diversification whilst ensuring that the distinctive character of the rural area and the service function of small towns, natural assets and cultural heritage are safeguarded and enhanced. However,

development proposals in rural areas should be suitably scaled, sited and designed to be in keeping with the character of the area; should consider how the development will contribute towards local living and take into account the transport needs of the development as appropriate for the rural location. Accordingly, while the policy recognises that circumstances may be different in a rural context to an urban one, it nonetheless does not allow, or advocate, the setting aside of considerations with respect to ensuring that development is located such as to make efficient use of land and existing infrastructure, and minimise dependency on private vehicles for accessing everyday facilities and services.

Policy 30 concerns tourism directly, and seeks to encourage, promote and facilitate sustainable tourism development which benefits local people, is consistent with the national net zero and nature commitments, and inspires people to visit Scotland. Provision b) of Policy 30 requires that proposals for tourism related development will take into account: i. the contribution made to the local economy; ii. compatibility with the surrounding area in terms of the nature and scale of the activity and impacts of increased visitors; iii. impacts on communities, for example by hindering the provision of homes and services for local people; iv. opportunities for sustainable travel and appropriate management of parking and traffic generation and scope for sustaining public transport services particularly in rural areas; v. accessibility for disabled people; vi. measures taken to minimise carbon emissions; and vii. opportunities to provide access to the natural environment. Again, the policy does not exempt tourist development from sustainability considerations, including minimising dependency on private vehicles.

It is considered that the proposed development would be contrary to NPF4 Policies 1, 2, 14, 15, 18, 29 and 30 in that it would result in an unsustainable development in an undeveloped rural landscape; and constitute a sporadic and unjustified form of development within a previously undeveloped field, while its siting and design would not respect or be compatible with the character of the surrounding area and would result in a significantly adverse impact upon the existing landscape character and rural visual amenity of the surrounding area.

It is not considered that the Appellant has demonstrated any significant benefits which would outweigh these deleterious impacts.

Conclusion

- The neighbouring development pattern is positioned in association with the local road network and/or building clusters. High amenity ponds have recently been created in Field 12 and locating this tourism development closer to the venue would ensure sustainability principles are met in both siting and layout, negating requirement for new roads.
- Excessive weight is placed in the Appeal Statement on achieving privacy and views for guests over and above sustainability principles of NPF4.
- This is a greenfield and entirely car dependent site for all interactions, especially future servicing and security, contrary to policies of NPF4.
- NPF4 places emphasises on sustainability and placemaking and this is not consider to comply with requirement for efficient use of land and resources.

The proposals remain unacceptable in siting having considered NPF4 and it is respectfully requested that the review is dismissed and the application refused.