

Rural and island housing

Introduction

1. The purpose of this paper is to provide information to help inform the Committee's evidence session with key stakeholders on rural and island housing.
2. The Committee is undertaking a short inquiry into the Scottish Government's Housing to 2040 strategy. The Committee has been considering whether Housing to 2040 is the right strategy to meet the increasingly significant and complex housing challenges we face in Scotland.
3. The Committee recognises that the policy solutions and housing needs of Scotland's rural and island communities are often very different from those in urban areas and accordingly agreed to undertake this session focussing solely on rural and island housing issues.
4. At this session the Committee will take evidence from—
 - Pauline Smith, Chief Executive, Development Trusts Association.
 - Mike Staples, Chief Executive, South of Scotland Community Housing
 - Stuart Black, Chief Executive, Highlands and Islands Enterprise Agency
 - Ailsa Raeburn, Chairperson, Community Land Scotland
 - Ronnie Macrae, Chief Executive Officer, Communities Housing Trust
5. Written submissions from Highlands and Islands Enterprise Agency and Community Land Scotland can be found at the Annex to this paper.

Background

6. Many rural areas have a lack of affordable housing. Several reports have highlighted the issue with housing availability and affordability in rural areas. For example:
 - A lack of affordable housing causes challenges for first-time buyers, young people, businesses and services.

- Around 25% of housing in rural Scotland is rented (this is lower than in the rest of Scotland¹). There is a lack of social housing, particularly in more remote rural areas, and a high number of second homes and holidays lets in some rural areas, which can make finding longer-term rental agreements challenging.
 - Houses tend to be bigger, which is not always suitable for e.g. younger and older people who may need single-occupancy homes. Some homes can have poor energy efficiency.
 - The lack of suitable affordable housing is also a problem for employers in rural areas² who struggle to recruit staff due to a lack of housing.
7. The 2021 Rural Lives report: Understanding financial hardship and vulnerability in rural areas³ found that a lack of affordable housing remains a problem, particularly affecting financially vulnerable people, young people, and single-person households. Social and demographic change has changed the housing market, contributing to widening wealth and income inequalities.
8. In some rural areas, a relatively small increase in appropriate housing options can be crucial to supporting the local community and economy allowing population retention and, for example, local schools to continue to stay open.
9. The Scottish Government has made commitments to improving the situation. In [Housing to 2040](#), published in March 2021, the Scottish Government stated that it will:
- “...take action so that rural and island communities have access to high-quality, affordable and market housing which has been planned alongside the economic and physical infrastructure and helps people to live, work and thrive – and we will help to stem rural depopulation.”
10. This action includes:
- funding within the affordable housing supply programme for the [rural and islands housing fund](#). Up to £30m is available for this fund this parliamentary term
 - in April 2023, the Scottish Government announced that up to £25m of the affordable housing supply programme⁴ would be made available over the next five years for housing associations and councils to help make best use of underused empty properties by making them available for key workers and others in need.
 - in August 2023, the Scottish Government announced £960,000 of funding, (jointly with the Nationwide Foundation) for Communities Housing Trust and

¹ [Poverty in Rural Scotland: a review of evidence](#)

² [Scottish Housing News: Thousands of job vacancies in Skye left unfilled due to housing shortage](#)

³ [Rural Lives report: Understanding financial hardship and vulnerability in rural areas](#)

⁴ [Scottish Government: Affordable housing initiative for key workers](#)

South of Scotland Community Housing over three years to deliver affordable housing projects

- from April 2024 councils can charge up to double the standard council tax rate for second homes
- the introduction of short-term lets licencing scheme
- in October 2023, the Scottish Government published a [Rural Islands Housing Action Plan](#). The plan recognised the link between housing and local economies and seeks to enable more housing provision through sharing of good practice and collaboration between employers and housing providers.
- the Rural and Island's Housing Action Plan also commits to supporting community led development and community led housing. It states that, "Community-led local development can be key to supporting thriving, resilient rural communities. The Community-Led Local Development network of Local Action Groups work across Scotland's rural and island areas to tackle their own, local challenges and opportunities by building knowledge and skills, supporting new ideas and encouraging co-operation. Where there is land or buildings of particular significance these can be brought together alongside community aspirations into a Local Place Plan. In turn, once registered, Local Place Plans are a means of informing the preparation of the Local Development Plan for the area."

11. At this meeting, the Committee will consider these actions and whether they are sufficient to meet the housing challenges faced by rural and island communities.

Conclusion

12. The Committee is invited to consider the above information in its evidence session on rural and island housing.

Clerks to the Committee
April 2024

Housing and the Economy

A Briefing for the LGHP Committee in advance of the Committee session on 30th April re rural housing provided by Highlands & Islands Enterprise.

Introduction to HIE's Role

Highlands and Islands Enterprise (HIE) is the economic and social development agency for the north of Scotland covering 8% of the Scottish population and 51% of its landmass. HIE is not a housing agency and for most of our existence we have not needed to concern ourselves with the operation of the region's housing system. That said, we are increasingly providing support, finance, expertise and performing a convening role to help address housing challenges, particularly in rural and island communities. To evidence that, we currently have a list of over 80 projects with over £1.5m commitment that includes, for example:

- Assynt Development Trust – site survey work
- Key worker demand assessments – Lochaber, Skye, Wester Ross, Cairngorm
- Lochboisdale masterplanning exercise
- Tomintoul & Glenlivet Development Trust – funding to support demolition costs and live-work units
- Colonsay – land purchase for community-led affordable housing matched by MOWI
- Community Land Scotland – research into second homes
- Portavadie – staff accommodation

In addition to our own staff located across all parts of the region, HIE supports 49 Local Development Officers in a wide range of communities of which 50% are focused on housing. This amounts to a total HIE funding of £476k for 2023/24.

Furthermore, HIE has a pipeline of enquiries and applications from businesses (largely in the hospitality sector) and communities of 27 projects with a potential financial ask of over £800k to support staff accommodation.

Our primary concern relates to the availability of housing for workers in particular, acknowledging that the primary focus across the current housing system in general is to address homelessness. These two approaches are not working together. Worker housing is left to market conditions which, in rural areas, are not providing the range of mid-market and affordable housing that is needed to satisfy a wide range of the working population. Our energy developers are telling us that they are concerned that the lack of available housing will be a major barrier to delivering Scotwind as they won't be able to recruit and retain the skills staff required. SSEN tell us that their number one risk in building out their £6bn transmission network is a lack of housing in rural locations. Our aquaculture companies are telling us that they spend most of their time, and a great deal of funding, trying to find or build housing solutions to support their rurally based workforce. And our tourism hospitality sector, as well as bearing the brunt of much local criticism for exacerbating housing shortages (through short term lets), are having to operate sub-optimally because they can't recruit enough staff due to a lack of accommodation.

Scale of economic opportunity

The forecast economy of the Highlands and Islands has never looked so good. The region has experienced major growth over the last decades of its traditional sectors such as tourism and hospitality, food and drink production as well as the emergence and expansion of new sectors such as renewable energy, aquaculture and marine and life sciences, and, more recently, the space sector where the region has been identified as an exemplar area to test and launch new technologies.

As we look at our near time future, **the Highlands and Islands is at the epicentre of the UK's transition to renewable energy** where the build out of the ScotWind projects allied with billions of pounds due to be spent on electricity transmission and major renewable energy projects such as pumped hydro storage, will see the north of Scotland ultimately **providing 20% of the UK's renewable power**. This economic activity is not simply unprecedented for the region but it is nationally and internationally important. And, importantly, it is not all centred on our more prosperous Inner Moray Firth areas but will be played out across all parts of our geography including our more rural and island communities.

Quite simply, the region's economy today is unrecognisable from that of the 1960s and the opportunity to springboard the region further is upon us. Right now, 1000s of jobs are being recruited to service the myriad of businesses operating across all our communities. However, we have a major problem in our midst - **there are just not enough homes for people to live in**. Indeed, even without this economic growth, existing business and communities are citing a lack of housing as their top-level barrier to expansion and sustainability.

The major point to note is that the scale of what is ahead of us in the next 10 years **far exceeds anything that has come before**. One only has to consider the SSEN Transmission contracts; Renewables/hydro projects; Offshore Wind roll out; and the Inverness & Cromarty Green Freeport and we will be looking at 1000s of jobs spread across the area. This is on top of an already stretched workforce where businesses are unable to recruit to posts now due to a lack of housing. A strategic, region-wide approach is required to look at this if the Highlands and Islands are to play its crucial role in energy transmission leading to a just transition and if the people in the region are to benefit from increased investment in housing.

The Rural Housing Emergency

A complex range of issues lies behind the rural housing emergency including extremely high build costs, lack of scale to attract developers, lack of enabling capacity to drive forward projects and a market failure of the building sector in rural communities. Many people and organisations are spending time trying to work through these issues but often finding them insurmountable. The system in the H & I mostly operates in four main ways:

1. Driven by the affordable (social) housing programme which monitors a version of need and demand to fit with its prioritised focus on homelessness and delivers mostly town-centre housing of a scale of 30+ units – it is not able to prioritise worker housing.
2. Driven by developers, primarily in urban areas, where scale and market pricing are key factors to ensure high profit margins (albeit that many of these developers also include social housing at scale). This type of house provision is negligible in rural west coast and island communities. Big volume housebuilders are not interested in our rural areas and as much of housing policy relies on them, we end up with unworkable policies

3. Driven by individuals either with access to land or enough capital to buy and build, often, an executive-type house
4. (Increasingly) driven by communities, often volunteers, who are desperate to grow local housing to meet the local need that is increasingly not covered by any of the above routes.

Each of these four routes generally operate in isolation, with some exceptions, and in rural areas the result is often stagnation in new housing development due to the lack of funding and/or the difficult process involved in developing a fundable proposition that meets with the varying sets of criteria and policies that have evolved over decades. **HIE believes that disconnecting rural housing needs from employer needs or from the economy is a mistake.** The Highlands and Islands Regional Economic Partnership (HIREP) has recently set up a Housing subgroup to focus on this precise issue, however it has been difficult to progress actions in an environment where housing emergencies are being called out across a number of our cities (mostly allied with homelessness). **There is a danger that rural gets lost in these discussions.**

For reference, the HIREP Housing group comprises representatives from national and regional organisations including four local authorities, one housing association as well as the SFHA, Scottish Builders Federation, Scottish Futures Trust, Scottish National Investment Bank, BE-ST, Community Land Scotland, Scottish Land and Estates, Prosper and the Scottish Government's More Homes Division, and is chaired by HIE's CEO, Stuart Black. It is progressing a number of workstreams including the development of a Rural Housing Fund, the potential for an innovative place-based housing project in the Highlands and exploration of how small scale offsite construction and modular build based on appropriate rural design approaches could work. However, the Group agrees that major structural change to the existing system is required.

Where are the main pressure points?

When you combine major economic growth opportunities with serious concerns around depopulation in many of our communities, a number of locations come to the fore where employers and communities are desperately seeking new housing development. The key message here is that by addressing housing shortages we can also address many areas of depopulation and help to stabilise and grow the region's population. HIE is gathering vital evidence to support this position and has reported on the issue to both the Convention of Highlands & Islands and the Regional Economic Partnership. An indicator of some of the places that are causing particular concern are noted below:

- Argyll & Bute – Arran, Oban, Mull & Iona, Tiree, Coll, to name some locations. Argyll & Bute Council were the first local authority in Scotland to declare a housing emergency. Argyll's population projections are particularly worrying. It also has one of the highest percentage of second homes in Scotland.
- North West Sutherland – Altnaharra, Achiltibuie, Ardgay, Bettyhill, Borgie, Durness, Lairg, Lochinver, Kinlochberrie, Melness, Scourie, Stoer, Tongue. Small numbers of houses required in each of these places. Hospitality businesses (linked to NC500), land-based employment (linked to peatland restoration) and emerging space activity are growing demand for housing in this area.
- Wester Ross – Plockton, Kishorn, Ullapool, Applecross etc – particularly linked to tourism and second home pressures. Kishorn Port already houses over 200 workers in a workers village and Bakkafrøst, the Faroese aquaculture company, are investing £100m in its operation there.
- Outer Hebrides – locations across all the islands are struggling with housing, outwith a 15 mile radius of Stornoway. Uist, which is facing the most significant depopulation, is particularly

challenged, as is Tarbert on Harris where business growth is being seriously compromised and may need to move to the mainland

- Lochaber and Skye – additional pressures of tourism are exacerbating the problem in these places, where vital workers in health and social care are unable to find places to stay
- Shetland and Orkney – both islands are good at working collaboratively to address their own challenges and show an excellent understanding of their needs/demand but are also facing cost issues and availability of construction workforce. Key workers and therefore vital services are put under threat.

In a further example - across three island-based development trusts – Arran, Mull & Iona and Harris – 100 key worker houses are being proposed to address the very specific needs in their communities.

Mull & Iona Community Trust – ‘Worker Accommodation Economic Impact Assessment: The overall impact of this could be transformational. If unmet demand for worker accommodation is fully addressed, then it is estimated that in 20 years the economy of the islands could be generating £20.1 million GVA/year more for the Scottish economy than it would if no action were taken and supporting nearly 400 more jobs’.

Harris Development Trust: This (housing) initiative started 8 years ago and the rationale for the need for worker housing in Harris has been fully evidenced through a local study that confirmed 210 more workers (mixed organisations) were needed to be accommodated but there was nowhere for them live.

Arran Development Trust: Arran has a proven need of at least 200 new affordable homes and a current Demand Assessment taken from the Common Housing Register shows 366 registered, many of whom have been on the CHR for in excess of 3 years, some for up to 10 years. Many vacancies across the island in the Health & Social Care, Education and Hospitality sectors remain unfilled due to the lack of suitable and affordable accommodation.

These trusts are struggling to make the housing system work for them and are spending valuable time engaging with Scottish Government and other bodies to finalise funding packages. HIE believes this should be made much more straightforward.

The role of employers and businesses

It has been suggested that employers need to step up and address these problems for themselves. Whilst this can definitely be directed at the bigger businesses such as SSEN Transmission, for most businesses they are small and unable to respond to the housing crisis. A question to ask is why should we expect employers in rural areas to pay for housing when this would not be expected in urban Scotland? Many of these businesses are marginal with limited profit to invest in staff accommodation. We hear from many employers that are paying for staff accommodation, particularly in hospitality businesses. One example on Arran, the Auchrannie Resort has spent more than £3.5m on staff accommodation to address their needs. The aquaculture sector is building houses in places like Rum and Colonsay or renting properties or buying up hotels – desperate measures being applied. However, this is only proving to add more pressure into the system, pushing up house prices and reducing the stock of housing available for the wider local population.

Core public services in education, health and police are also permanently struggling to find accommodation for their workers. In Orkney the council has had to find circa 200 housing solutions for vital incoming/agency healthcare workers, thus reducing the housing availability for local people and pushing housing prices up even further – The average house price in Orkney Islands was £209,000

in February 2024 (provisional), up 8.2% from February 2023. This was higher than the rise in Scotland (5.6%) over the same period (Office for National Statistics). For context, there are 1,480 businesses in Orkney Islands. 90.2% are micro businesses. 9.0% are small businesses. 0.7% are medium businesses. 0.1% are large businesses and the average wage is £32k.

HIE believes that certain employers and businesses can contribute to addressing the rural housing emergency but cannot and should not be expected to do so in isolation. Incentives need to be found to make housing propositions attractive and easy to progress and, importantly, need to be collaborative with other parts of the public and private sector. However, employers will not provide the total solution for housing especially in rural areas and other steps need to be taken.

What needs to be done?

HIE believes the rural housing emergency is a serious threat to our economic future and wishes to see a clear focus on **an economy-led housing policy**. We believe that this new approach would not only deliver economic benefit to the Highlands and Islands but would also address many other Scottish Government priorities – addressing depopulation; delivering a just transition to Net Zero; supporting community wealth building; and tackling child poverty (through improving the quality and range of housing provision). The existing system, which has evolved over a number of decades, is weighted towards a policy of homelessness and does not reflect the wider housing needs across the region. Some suggested areas for consideration are:

1. **A strategic planning exercise** needs to take place that captures the wide range of economic and infrastructural projects in the rural parts of the Highlands and Islands through the lens of housing and planning. This exercise needs to combine the different parts of Scottish Government that would be required to work together, with stakeholders. This would include ministers or officials from the Economy, Planning, Business Support, Rural and Homes divisions, all in the same room at the same time to consider a joined up strategic response to both the economic boom and the rural housing crisis that we face.
2. **Key Worker Fund** – In April 2023, the Scottish Government committed £25 million through the Rural Affordable Homes for Key Workers Fund – a five-year initiative to help fund Local Authorities to identify affordable homes for Key Workers in rural communities. However, we understand that this has not yet been applied and its mechanism for dispersal is linked to the existing system which is driven by the affordable housing programme. It is also aimed at empty homes which makes its focus too narrow. We believe that this could be re-purposed and made more flexible to address identified place-based worker housing needs, be they identified or led by communities, local authorities or a business collaboration. The current approach is too restrictive.
3. **The Rural & Island Housing Fund** has been hugely helpful in supporting some of the more difficult and expensive rural housing developments, and the support from More Homes staff has been widely complemented in their effort to help. The Fund needs to be increased and made more flexible to respond to community led worker housing requirements. It also needs to support feasibility work, infrastructure and be used to incentivise employer collaboration.
4. **A Community-led Housing Fund** - The growth of community trusts across rural Highlands and Islands, and their focus on worker housing requirements, needs to be recognised either through the flexing of the above two funds or through the establishment of a special fund for community-led housing. Access to this, or the above funding, needs to be made easier for communities who are spending years (often 5+) working their way through the complex funding mechanisms and regulations associated with housing development. In HIE's view, the

support for Community Groups needs to be made less complex and be delivered much more quickly.

5. **Consideration of a Rural Housing Agency** – HIE believes that the situation is serious enough that consideration must be given to major system change. This system change may require the establishment of a Rural Housing Agency, comprising many of the current housing stakeholders, but with a sharp focus on delivering houses in rural areas. HIE believes this focus is currently lost amongst many other competing challenges in Scotland. The HIREP Housing Group would be happy to convene a special meeting to discuss this.
6. **Enabling Capacity** – HIE works closely with the Communities Housing Trust. CHT are ideally placed, experienced and passionate to be central to addressing the issues that are referred to in this paper. Indeed, they have been behind many of the excellent community-led housing developments over the past 10+ years. It is our view, however, that they are grossly under resourced which is impacting on their ability to deliver the number (and pace) of housing developments that are required. Releasing them from their commercial role, doubling them in size and providing additional expertise in legal and financial matters would significantly improve our region’s ability (and that of our community trusts and employers) to develop and deliver the employment-related housing that is desperately needed.

In conclusion, Housing to 2040 was a national approach which could not be expected to reflect the nuance of development in both central Edinburgh and rural communities like Mull or Lochinver. The Rural and Island Housing Action Plan does not offer enough to address some of the economy led housing issues and we think it is critical that now happens. We would be pleased to work with Scottish Government to help progress concrete solutions to address, what we believe to be, our greatest economic challenge facing us today and for the foreseeable future.

Highlands & Islands Enterprise
April 2024

COMMUNITY* LAND SCOTLAND

Community Land Scotland evidence to the Local Government, Housing and Planning Committee

30 April 2024

There is a rural housing crisis, with some Councils declaring a housing emergency. The private market in housing development in rural areas has failed. Values have risen significantly pricing out both local buyers and renters. Development costs have also risen significantly. This makes profit led development impossible in remote rural areas, especially on islands.

RSLs are active on some of the larger areas (Mull and Western Isles) but these are limited in number and scope. They focus on main settlements, with again scheme affordability outwith their usual models.

Meanwhile housing demand continues to increase. The introduction of the STL Licensing scheme has been helpful in starting to readdress the loss of so many permanent homes to the tourism sector, but this will take many years to significantly impact availability, if it ever can. The tourism sector continues to ignore the impact their industry has on sustaining the local communities and places which their visitors value. Industry pressure is immense and it is being left to **individual communities** to press for the regulation necessary to protect their own places, through the Short Term Let Control Area Order approach.

Communities continue to be the main developer of affordable housing in many remote and rural locations. It must be put on record that communities are having to step in and deliver housing solutions where both the private **and public** sectors have failed. This work is at the cost of other work that community development trusts would be doing to help sustain and grow their communities. However, they see at first hand the impact a lack of available and affordable housing is having on their local place – the loss of young, working age families leading to depopulation and loss of key services. Those communities that have managed to navigate the complex funding and development landscape should be congratulated for their years of hard work and effort.

This has been the situation for some time now and there appears to be little action to actively address these issues. Different agencies are coming together through the Regional Economic Partnerships to try and find solutions, but the issues are complex and long standing. Many of the issues need also addressing in other areas of Government policy and funding. This can only be addressed by a joined up cross Government approach to tackling the systemic issues.

The renewables and natural capital based economic opportunities in front of communities, especially in the Highlands and Islands, are also immense. If the much

forecast thousands of jobs can be secured for rural Scotland, where the economic and social benefit, will be greatest, then this will secure the future of many communities for generations to come. There is an urgent need to provide the strategic and policy support to ensure the housing required to service these new well paid long term jobs is delivered. As a result of narrow SG housing policies, it is clear this is not happening. The many promised outcomes of the Rural and Islands Housing Action Plan, the Islands Plan, the Depopulation Action Plan and the forthcoming Rural Delivery Plan will **not** be delivered without this change.

This failure to link economy and housing is also destroying current businesses in rural communities, where traditional sectors cannot recruit or retain staff due to a lack of housing. Essential services, such as health and education, are also unable to recruit or retain staff. There have been small limited interventions, such as the Key Worker Fund, but its remit and eligibility criteria are unnecessarily very restrictive. As a result no successful applications have been made to this Fund. All this in a time of housing and economic crisis for many rural communities.

Local businesses are trying to help with they can with aquaculture businesses working in partnership with communities to deliver housing, and tourism providers either buying up scarce housing stock (further exacerbating issues in some areas) or working with HIE to build worker accommodation. The proposal by Harris, Mull and Arran communities to build 100 units for worker accommodation has however been refused by the More Homes Team in SG. It is difficult to understand the reasoning for this.

What needs to happen

1. Funding streams in SG need to focus on **impact** – what could be achieved by the delivery of new homes (addressing depopulation, demographic challenge, local economic stability, community wealth building, child poverty, the Just Transition to Net Zero etc etc.) rather than focussing on a single policy strand of homelessness and number of housing units delivered. The Government's stated Place Based agenda is not delivered by the current approach to housing funding.
2. Eligibility criteria for funds needs to be relaxed, ensuring that partnerships between the private, public and community sectors can proceed. Again inflexible funding rules prevent this from happening. This is all within SG scope and would not impact on budgets, which continue to be underspent. Thriving communities depend on good local jobs and services being available, in the private and public sector. Supporting employer led housing, through relaxing funding criteria is an obvious solution and there are examples of where this has been very successful.
3. There must be a recognition of the immense risk SG funding rules places on community organisations, led by volunteers – who are delivering what **should be public services and infrastructure**. All recognise the budget constraints on SG, but offers to help address the impact of some of these constraints by communities should not then be further hindered by inflexible and

unreasonable policy and funding approaches. The latest move by the More Homes team to place all of the pre build risk and cost onto communities (which can be in the order of £150,000 +) is completely counter intuitive and unreasonable. The partnerships that communities are able to build with the private and RSL sectors seem impossible to achieve with the SG. With significant capital costs attributable to all rural housing projects (now in the order of £300k + per unit), funding usually requires to be secured from multiple sources of grant and/or borrowing – or the raising of community investment via bond or share. All of these elements will be contingent upon acting as match against secured Rural Housing Fund grant. This will not be possible if the awarding of RHF becomes the final piece of the jigsaw.

4. Construction tenders are time limited. It is extremely unlikely that an RHF full grant application will be considered and approved within these timeframes without the “actual costs” subsequently increasing.
5. Community led development is development that is led by communities – an obvious statement but it is **not** led by housing experts. Groups of local people, needing to step in and step up to address housing market failure, are not housing experts. They need the professional and technical support that RSLs and private developers have in house. The housing enablers are absolutely essential to this process, and have proved to be very successful at what they do. They need long term funding over a number of years, especially because the process of developing housing is long and complicated, often due to SG funding, policy or planning rules. An end to end review of the whole process, from inception to first occupancy, would be a useful exercise to understand where the delays and barriers to progress are, and how these can be overcome. CLS understand that private landowners would also be more minded to release land for housing if they had access to similar advice. Again, not to do so is counterintuitive and cuts directly across so many other SG policy agendas.
6. It has been heartening to see NPF4 recognising the role of rural housing and community led development. However, we continue to see examples of poorly applied planning policy and local divergence which makes development more complex and expensive. There appears to be no recognition of the intense consultation that will have already happened in community led projects and the positive impact such developments will have on a wide range of apparent planning outcomes. Again, a detailed review of how the new NPF4 is helping or hindering rural housing development would be incredibly valuable.