

COMHAIRLE NAN EILEAN SIAR NATIONAL PLANNING FRAMEWORK 4 'CALL FOR IDEAS'

The Comhairle's submission to the NPF 'Call for Ideas' aims to provide a rural and islands' perspective and solutions on the national planning agenda, and how NPF4 might support and promote development and investment throughout Scotland. The stated outcomes for NPF much align with those of the Comhairle and other regional partners, in particular the aspiration to grow Scotland's rural population. This is a key objective for the Islands and will require mechanisms to first stabilise the population and rebalance the demographic profile, in order to then seek to grow the population.

This response has been informed by discussion with internal and external stakeholders. Some of the comments noted in the response below could be aligned to several of the five questions posed, but have not been duplicated across the submission, however the Comhairle's response to Qs 3 and 5 have been taken together. The Comhairle would support its comments being duplicated where assessed as appropriate.

These comments have been finalised in April 2020 when the full impact of the Coronavirus is still being played out, thus it is hard to fully assess the implications. However the impacts already experienced and the likely journey to recovery anticipated, along with a likely disproportionately negative impact on the population and economy of rural and islands areas advocates that serious economic, investment and diversifying interventions will be required. Whilst the objectives of NPF are for a longer term vision for Scotland, NPF 4 must also address the more immediate short and medium term impacts of Corona.

Regarding 'Island proofing' we understand that the Islands Team resource has currently been diverted away from the National Islands Plan Implementation Route Map and the Islands Communities Impact Assessment guidance to Covid related activity and that this may be the case for some time. We do seek that robust Islands Communities Impact Assessment guidance is still progressed as soon as possible to add value to this crucial stage of Planning Reform.

Q 1 What development will we need to address climate change?

- **Secure, clean and efficient energy systems and increased use of decentralised energy supply** such as Western Isles SSEN submarine inter-connector cable; Heat Smart Orkney Grid; Renewable Energy to Hydrogen/Heat and Energy Storage initiatives in the islands. Encouraging the use of decentralised energy supply reduces transition losses making the system more efficient and thereby ensuring the security of supply is increased nationally as customers don't have to share a supply or rely on a small number of large and remote power stations. The National vision needs to be a narrative of **energy transition**, focused on meeting emissions targets and adapting to the effects of climate change.
- Opportunities to adopt a **circular economy approach** by reducing unnecessary waste in local systems and the wider Scottish economy e.g. **Outer Hebrides Local Energy Hub (OHLEH)** The OHLEH project delivers renewable power, heat, and transport to the local community by integrating a variety of innovative technologies to improve the efficiency and output of the Anaerobic Digester site at Creed, and the salmon hatchery in Barvas - both on the Isle of Lewis. The project is focused on encouraging a circular economy, where fish waste from the hatchery is used to increase the biogas output of the anaerobic digester. The added value of this being: increased heat and electricity output from the Combined Heat and Power (CHP), which allows for the production of hydrogen. The use of new and existing hydrogen-generation infrastructure to release additional renewable energy generation capacity. The use of hydrogen as transport fuel for the Council's refuse collection vehicles. The

development of the local supply chains and skills required to generate, transport and use hydrogen and oxygen locally, with both gases supplied to the salmon hatchery to power their Hydrogen fuel cell. Overall, there is potential to develop local supply chains across a range of emerging and growing markets for local energy systems across all regions of Scotland – thereby, providing an opportunity for more balanced regional development within Scotland.

- Promotion and development of statutory minimum requirements **Local Heat & Energy Efficiency Strategies** and subsequent **Local Energy Plans** and opportunities for further **community-led activity in local energy production** potentially laid out in community energy plans as part of a local place plan or similar? The Outer Hebrides have a legacy of strong community engagement in local renewables generation, primarily through supporting community ownership and community generation schemes. Future opportunities could include: developing, owning and operating local energy system projects that create local solutions.
- Increased opportunities and more efficient use of **renewable and low carbon energy technologies** – New energy technologies have the potential to build resilience and help address spatial disadvantages and high fuel costs in rural areas. e.g. repowering of renewable energy developments; investment in off-shore wind and marine; smart home interconnected living (where technology automates decision on heating and comfort requirements and can facilitate energy saving through innovations such as whole house shut down).
- **Island governance models:** Our islands can be at the forefront of the transition to low carbon energy. With high levels of land ownership and environmental stewardship, and community energy initiatives island communities can lead the way in terms of adaptation through community governance models and effective management of land and biodiversity. The introduction of climate change adaptation and mitigation measures, whether increased revenue for island communities through renewable energy projects or the protection, recovery, restoration or enhancement of natural carbon stores (on land or in the sea) or the introduction of solutions to combat coastal erosion, can have a direct, positive effect on the local economy and environment.
- Better, earlier and **more widespread use of climate risk assessment.** Good governance informed by sound science is essential to the creation and maintenance of a strong communities capable of living within environmental limits. Planners need more detailed assessment of local vulnerability to climate impacts and the effects of extreme weather events; this will help them to better understand the implications for the built environment, development, infrastructure, services, biodiversity, vulnerable groups and community cohesion and identify the local or regional climate risks that planning policy needs to address or consider.
- Increasing the influence and better integration of **strategic environmental assessment** across a broader range of plans, programmes and strategies; at the same time streamlining the SEA approach so it is more integrated, responsive and up to date; also, ensuring positive contributions to sustainable development are better identified and highlighted in the process.
- Policies need to allow for the **long term implications of decisions** to be better assessed and considered, such as promoting adaptation approaches in design and building in flexibility to allow future adaptation if it is needed; assessing the potential vulnerability of a development

to climate change risk over its whole lifetime (e.g. water availability and infrastructure; extreme weather, rising sea levels, flood risk, coastal change, acidifying oceans).

- **Increased emphasis on resource efficiencies and low-carbon low-energy design** in development. Getting design right from the outset is much cheaper than to retrofit e.g. use of reduced-embodied carbon materials; energy efficient design; recycling the materials at the end of a developments' life; renewable and low carbon sources of heat and energy (no new gas connections); raised standards of energy efficiency (particularly in affordable housing); appropriate ventilation and, where applicable, timber-framed construction. A requirement for reducing overheating risks in new builds is needed, more ambitious water efficiency standards, continual appraisal of flood risk areas, and increasing requirements for greenspace, sustainable transport connections including pathways that increase walking, cycling and sustainable travel opportunities and encourage smart mobility; and innovative decarbonised transport solutions such as electric or hydrogen powered.
- Promote rural and island areas as **centres of excellence and innovation** for 'non-traditional' rural sectors that champion environmental sustainability e.g. alternative uses for aquaculture waste; alternative energy for transport/services; renewables and electricity generation; climate change and adaptation; community / nature based solutions. Also support for innovative projects that need national strategic coverage to be effective, e.g. KIMO 'Fishing for Litter' Ports.
- There is an opportunity for a centre of excellence on **green/sustainable/rural tourism**. Rural and islands areas have been inherently practitioners of eco-tourism for a sustained period already.
- **Forestry**: Seek to expand the geographical extent and range of economic, social and environmental benefits that communities derive from forestry, including islands.
- **Better integration of adaptation and mitigation approaches** e.g. no or low cost responses to climate risks that also deliver other benefits, such as green infrastructure, river restoration for natural flood management, land management measures etc. that improves adaptation, biodiversity and amenity. Restoration of peat bogs. Encourage new development away from the coast that does not have a locational need.
- **'Sustainability'**: NPF4 and LDP Spatial Strategies need to be smarter at building resilience and promoting protection and sustainable use of environmental assets, ensuring future growth and decisions on the location of services and assets is better aligned with connectivity and sustainability. NPF4 should emphasise that growth and investment in key sectors rely on the continued environmental quality of the environment, infrastructure and the sustainable use of natural resources, promoting an **ecosystems services / eco-security approach** that reflect best land-use practices (at the national level for integrated decision making and the local level for practical implementation) to ensure that the collective pressure of all development and activity is kept within levels compatible with the achievement of good environmental status; this requires better integration of the information and mapping that supports land use planning decisions and ties national and local policy frameworks together. *Ecosystem services are the many benefits that communities gain from the natural environment and properly functioning ecosystems, e.g. provisions (food and water); regulation (control of climate and disease), support (soil, nutrient and oxygen production) and cultural (heritage and recreation).* An ecosystems services approach is particularly relevant to island communities which are unique and diverse and more vulnerable to climate change and inappropriate resource use. Small islands

supporting small communities are recognised as a special case for sustainable development by the United Nations (Agenda 21) because of their relatively small populations and open and highly sensitive economies, limited natural resources, restricted usable land area, isolation from and yet dependence on external market, high cost of transportation, susceptibility to natural disasters and climate change, constrained adaptation capacity and limited development options.

- **Purpose of Planning:** The purpose of planning “to manage the development and use of land in the long term public interest’ and anything which contributes to sustainable development or achieves the national outcomes is to be considered as being in the long term public interest, however policy frameworks are not robust enough to ensure decisions have appropriately balanced long term sustainability over short term economic gain. Recent modernisation and neoliberalism in planning has made ‘economic development and delivery’ synonymous with ‘public interest’ and created a planning system shaped primarily to respond to the market. A focus on efficiency and deregulation in Planning should not undermine its commitment to democratic decision-making or create a widening discrepancy between its vision and outcomes.
- **Flood risk and Coastal Areas–** The Climate central web page https://coastal.climatecentral.org/map/8/14.4748/40.0108/?theme=sea_level_rise&map_type=coastal_dem_comparison&elevation_model=coastal_dem&forecast_year=2050&pathway=rcp45&percentile=p50&return_level=return_level_1&slr_model=kopp_2014 (view in chrome) shows the land that is projected to be below annual flood level in 2050. This shows that a large area of townships and infrastructure in the Islands being affected particularly North and South Uist and Benbecula. There needs to be a policy that addresses resettlement and movement of infrastructure rather than just coastal protection.

Q 2 How can planning best support our quality of life, health & wellbeing in the future?

- **Land availability and rural sustainability.** Increasing the population of rural areas of Scotland is one of the key outcomes for NPF4. Land availability, in the right place at the right price, is critical to securing long term renewal of remote rural populations, and community land ownership and crofting tenure are key to enabling this. NPF4 must have regard for any Land Rights and Responsibilities Statement (LRRS) or any strategy for land ownership or use prepared by Ministers and should give positive endorsement to measures that modify or change the arrangements governing the possession and use of land in Scotland in the public interest.
- **Importance of the Rural Economy:** The leading recommendation from the National Council of Rural Advisers ‘blue print for Scotland’s Rural Economy’ (2018) is that a vibrant, sustainable and inclusive rural economy can only be achieved by recognising its strategic importance – and effectively mainstreaming it within all policy and decision-making processes. This includes embedding the rural economy in the National Performance Framework and given equal importance in policy-making and investment decisions across government. This should include rural areas out with the central belt that have different issues to the rest of Scotland.
- **Empowering Scotland’s Islands.** NPF3 presented a wide appreciation of the challenges and opportunities facing rural areas, recognising the unique context of ‘coastal and island communities’, and identifying Stornoway as a ‘coastal and island hub’ and ‘key port’ and a focal point for investment and transport connections. The NPF4 needs to build on this and

give strong support to delivering the objectives of the National Islands Plan and its place based approach – this should include:

- Give a clearer statement on when **island proofing** will be expected for certain types of plans, programmes and strategies.
- **Well located, well designed and responsive affordable housing:** Access to housing affects population decline and influences the decisions of young people to leave or return to island communities. This in turn affects the sustainability of local services, especially schools. Lack of accessible and affordable housing is a barrier to attracting families to island communities. Local Development Plan/Local Housing Strategy need to be better informed and have a better understanding of the dynamics of local need/demand. When **NPF4 sets targets for housing** it should ensure there is sufficient **flexibility for island interest** based on our distinct development context and demand profile, this is also true for **transport and digital connectivity**. Accurate housing targets for rural island communities are difficult to predict and tend to be underrepresented by formal assessments such as Housing Needs and Demand Assessment, mainly due to: the difficulties in working with low numbers, the use of large and unworkable Housing Market Areas, unreliable data, and other localised factors *e.g. applicants on the housing waiting lists who like to live in a rural settlement will often not put this down as their area of preference as they know there is no present or planned affordable housing in the area, or the present stock is degraded or in long term occupation. They are more likely to opt for where there is known affordable housing development planned and in progress (e.g. Stornoway) where they are more likely to be successful in the short term as timing is often the critical factor.*
- **Resettlement.** The Planning Act (2019) states that the NPF4 must have regard to desirability of resettling rural areas that have become depopulated however this needs careful consideration in the islands where housing issues are unique and not necessarily down to constrained land capacity. In fact rural settlements in the islands tend to be under-capacity rather than over, where difficulties in accessing housing exist alongside a large number of empty homes and derelict or poor quality crofts. Limiting factors can include land ownership and affordability, crofting tenure/turnover, high incidences of second and empty homes; poor quality of available housing stock; high transport and material costs to renovate and build; high incidences of fuel poverty; poor and decreasing accessibility to public services and transport options which make them less appealing; growth in short term lets for tourism; and absentee or inactive croft tenancy. Depopulated settlements in the islands tend to be land locked with poor accessibility or services and while there are exceptions, re-establishing these settlements may not be as effective as developing a more responsive policy and legislative framework and taking forward initiatives that tackle widespread issues. As part of the preparation of the current Outer Hebrides Local Development Plan (2018) monitoring showed development issues to have arisen around proposals that were: outside or edge of settlement areas on common grazing, croft or community owned land; close to or within main settlements; on offshore islands; for recreational huts and in a small number of cases in abandoned settlements (some of which still contained crofts in tenure). Example of this can be provided.
- **Joined up services and integrated approaches** to tackle fuel poverty, social isolation, health inequality, aging demographics e.g. integrated health and social care projects such as the Integrated Joint Services Board - Goathill Care and Housing Development, proposed Barra and Vatersay Community Campus.

- Improve transport links and public transport to match evolving seasonal demand; including better **availability of transport services and reduced relative cost of transport** to and from the island; aligned timetables between service providers, increased capacity on island ferries, increase availability and decreased cost of airline travel; enhanced timetable for dualling of A9; a new Ferries Plan.
- Increased demand for **non-standard siting and design** of development. Changes in demography, land availability and socio-cultural trends have increased demands for more varied siting and design and adaptive design i.e. single person occupancy, small home living, zero carbon design, recreational huts, care at home/ageing friendly housing; on site annexes for dependants/boomerang kids; eco adaptation; alternative tourism accommodation (e.g. pod, yurt, cabin) and seasonal workers. It is important to ensure there is clear policy direction and a responsive policy framework in place to assess such applications while maintaining standards to ensure they are well designed, safe and energy efficient. Compliance with regulations/legislation, environmental impact and design will be critical factors and the Scottish Government should develop clear guidance and policy to assist consenting bodies. National legislation on the definition of a caravan needs review (1960s Act) as an increasing number of alternative development are being inappropriately assessed under this.
- **Nature based solutions to climate change.** Recognition of the importance of community environmental stewardship and traditional practices in maintaining and supporting a range of unique habitats, biodiversity and iconic landscapes in rural and island areas.
- **Self-sufficiency built into development / design that mimics natural systems.** Decentralised and closed loop energy supply and use; smart home tech; self-repairing materials, water harvesting and efficiency; allocated allotments, community growing opportunities and rooftop gardens. Recognition and support of the development of high-tech interconnected homes will be particularly useful for meeting energy efficiency targets and designing homes for the elderly.
- **Knowledge-sharing** between countries could be a key driver in the reduction of costs in the development and operation of local energy systems across Scotland.

Please Note Qs 3 & 5 have been answered together after Q4.

Q 4 How can planning improve, protect & strengthen the special character of our places?

- **Embedding the Place Principle** across disciplines to ensure that places are shaped by the way resources, services and assets are directed and used by the people who live in and invest in them. The Place Principle provides a shared understanding of place, it helps overcome organisational and sectoral boundaries, encourages better collaboration and community involvement, and improves the impact of our combined resources and investment.
- **Inclusive Growth:** Growth that combines increased prosperity with greater equality, creates opportunities for all, and distributes the benefits of increased prosperity fairly.
- **European Environmental Designation transition**
- **Empty Homes Initiative** As at 2018 figures showed there were 522 long-term empty properties in private ownership on the Outer Hebrides and that 231 of these have been

vacant for 12 months or more. It equates to 3.5% of local housing stock which is more than twice the national rate of empty properties. Some areas are more affected than others. In Stornoway 4% of homes are lying empty but that rises to 8% of homes being long-term empty in the more rural areas.

- **Regional Marine Planning and integration with terrestrial Planning** – see comments on blue economy and the marine sector below.
- **Peatland** There is a limited amount of historically damaged peat within the Outer Hebrides this has implications for restoration as a result of development e.g. wind farms. National policy provides protection of peat as a carbon sink. However, with sea level rise predictions it is likely that development will have to be moved away from the coastline and development will occur inland in areas of currently undeveloped peat, which will be unavoidable. There is opportunity to provide off setting when this development occurs. There is also scope for visitor and educational experience in a possible center of excellence for peatlands and carbon rich soils.

Qs 3 and 5 have been answered together below, with comments on National Developments in the end section.

Q 3 What does planning need to do to enable development & investment in our economy to benefit everyone?; And

Q 5 What infrastructure do we need to plan and build to realise our long term aspirations?

Coronavirus The fallout, impact and mechanisms for recovery from the Corona Virus pandemic are still being played out but some of the implications here in the Islands are already apparent: transport; tourism; our high value food, drink and manufacturing exports (fish and shellfish, Harris Tweed etc.); other activities like crofting, SME businesses, construction sector, literally cut off. Many of these sectors have already suffered from the uncertainties and fallout of Brexit.

We, as a region, will need to reimage and reform our economy, re-establishing a strong service and construction sector and building resilience into localised economies, to support any form of recovery. Planning and investment will have a crucial part to play in this and we look to Scottish Government and mechanisms such as the NPF to assist with this. The development context in the islands was already distinct and we will need tools like NPF to recognise that different policy approaches and leverage may be required to deliver on NPF's stated outcomes *and* Coronavirus recovery here in the Islands.

Brexit brings specific risks to the islands, largely due to the island benefitting from a high levels of support from a wide range of EU funding initiatives (such as ERDF, ESF, CAP, SRDP, EMFF, LEADER, ETC) and a high proportions of the island workforce being employed in Brexit sensitive industries. There are also concerns for ferry maintenance and supply chains, procurement for current and future ship building projects and impacts on costs and a reduction in the amount of investment available for ferry and harbour improvements. NPF4 should consider the findings on the interim report by the national council of rural advisors on "Potential Implications for Rural Scotland of the UK leaving the European Union (2017)". Some of the key recommendations for island areas relevant to NPF4 include:

- Promote rural areas as centres of excellence for ‘non-traditional’ rural sectors such as; advanced manufacturing, digital technologies, e-commerce as part of wider Economic Strategy (see expanded over page).
- Overcome connectivity barriers (public transport, roads, broadband, mobile internet and even mobile signal in many instances) to attract labour into (and retain young people) rural areas.
- Promote opportunities for people to work remotely and base more businesses in rural areas, for example through the use of shared space.
- *Whilst it is clear that EU funding has and continues to make a difference in many areas, some areas with challenging landscapes tend to still be found in the...Western Isles...There are two key issues in terms of accessibility remoteness (peripheral, insular, sparsely populated) and structural legacy (still needing to restructure their local economies). Such disparities suggests that regardless of the funding source there is an opportunity going forward to put in place a territorial policy and delivery framework (local and regional) that it is better targeted, better reflects the needs of rural Scotland and is better focused on outcomes. In terms of targeting resources, there is scope to learn from the application of the LEADER programme in Scotland which made funding allocations for Community Led Local Development. It is this local decision making model that has made it successful, and it is fit for replication across many programmes, and it is in the spirit of Community Empowerment.*
- Have a strong and adequately financed policy and delivery framework that supports the needs of Scotland’s rural communities, businesses and environment with appropriate levels and types of funding support. Any future support proposals should be stress tested by sector and by region to fully consider implications to businesses and communities alike.
- Ensure that any reframing of EU regulation and standards suit the Scottish context, is based on strong science and avoids unnecessary complexities and burdens for businesses and consumers.
- Scope out future policy framework for rural areas including at regional / local level, e.g. application of inclusive growth at the local level to better meet the local circumstances.

We would seek that the UK Government does undertake a consultation on the Shared Prosperity Fund, as the Scottish Government has done. The aim of the Shared Prosperity Fund is to tackle inequalities across the regions and to improve regional competitiveness, particularly those regional economies lagging behind, such as the Outer Hebrides. The Fund should be devolved and local authorities should have a key role in its delivery, as best placed to identify priorities and to address regional challenges.

Other comments on development and investment:

- **Blue Growth, Crown Estate Assets and Regional Marine Planning (RMP):** Maximise opportunities for the marine economy in the Islands through continued support for RMP to manage marine economic activities in a sustainable manner and provide increased

opportunities for island communities / opportunities arising from growth deals. Commitment to deliver the powers and duties in the Scottish Crown Estate Act 2019 and provide further opportunities for island communities to derive enhanced benefits from the assets in their area, including continued support for the Crown Estate Asset Management Pilots that encourage and support ownership and control of assets by communities.

- **Inward investment plans for rural areas must encourage sectoral diversity** and recognise the opportunities for growth in non-traditional rural industries at all levels. This is particularly relevant for sustaining communities in our remote rural villages where an increase in self-employment, community land ownership, home-working and croft diversification has led to a move towards small scale economic proposals within rural settlements. While recognising the fundamental importance of traditional crofting practices to the rural economy and the sustainability of island communities and their environments; there is potential for land holders to increase the return on their land by making better use of their crofts' physical resources and characteristics (including their own rural skills). This can help to retain people in rural communities and release potential in the rural economy. While it is important to ensure crofts remain capable of being agriculturally productive and viable, in certain circumstances there is scope to take forward diversification proposals e.g. farm shop, retail outlets, tourism accommodations (camp sites, pods etc.), venue hire, speciality or energy crops, rural skills workshops, livestock products etc. At present there is a perception that it can be difficult, costly and time consuming to navigate planning and the Crofting Commission to enable such proposals and there is sometimes inconsistent application or interpretation of policy at the national and local level. A healthy turnover of vacant croft tenancies is also a critical factor in this. Clearer policy direction is needed and initiatives aimed at removing barriers to diversifying the rural economy.
- **Overcoming the Digital Divide in Rural Areas.** Focus on ensuring digital strategies benefit remote rural communities and create the conditions for smart villages – tackling all components of the digital divide while in parallel taking into account the specific needs of each rural area and the existing landscape of policy support: e.g. broadband infrastructure; promoting the uptake of digital services; digital skills and literacy. These components reinforce each other, so if not addressed together, it would lead to a low level of awareness, demand and uptake of digital technologies, which in turn damages the business case for further investments. Therefore, they need to be addressed together in digitisation strategies. Broadband: Although there has been significant progress through Digital Scotland Superfast Broadband (DSSB) and 4G rollout, the statistics hide where connectivity is most needed and not met, particularly the most remote regions and those with economic or social challenges, for which digital access could be most transformative. A significant number of these remote rural settlements are still without superfast and the mop-up R100 project has faced numerous delays and seems unlikely to reach its target of 100% by the end of 2021. The NPF should mandate the delivery of connectivity standards to rural areas.
- Recognising **tourism's multiplier effect** and the direct and indirect benefits of this sector for island/rural communities where it creates jobs in the primary, secondary and tertiary sectors and can have a diverse and unique geographic reach from service centres to remote rural

communities through accommodation, food and drink, activity provision, craft diversification projects etc. Focus should be on recognising the enormous potential of this sector for rural areas, on ensuring tourism development strategies have sustainability at their core, encouraging and influencing investment in the sector and supporting infrastructure i.e. Rural Tourism Infrastructure Fund. The Scottish Government should ensure that the regulation of short-term lets takes account of the unique circumstances of island communities and make special provision for them where required.

- Promote rural and island areas as **centres of excellence** for ‘non-traditional’ rural sectors such as advanced manufacturing, digital technologies, and e-commerce, as part of a wider Economic Strategy; and create communities of interest (hubs, digital and/or physical) where collaborative and cooperative endeavours can be encouraged and supported by government agencies. These should be used to incubate and promote new start-ups. An example might include a centre of excellence in the Islands for ‘climate change adaptation and mitigation’ based on the islands low-impact/high-nature value practices. The centre could provide global climate change leadership through research and development of methods that address climate change through nature based solutions with multiple benefits including, for example the protection, recovery, restoration or enhancement of natural carbon stores (on land or in the sea) e.g. peatlands and salt marshes; the introduction of nature-based solutions to combat coastal erosion and flood risk; the adaptation of the aquaculture and fishing industry etc.
- Ensure **local communities benefit from investment**, for example through improved transport links in tourism development.

Specific Island developments/ solutions proposed and significant investment sites

Digital: targeted investment to implement appropriate 5G, LoraWan/IoT (Internet of Things), and gigabit fibre connectivity to demonstrate the transformational business and social impact of these next generation digital connectivity technologies in remote rural communities and allow the full benefit of the Islands Deal innovation projects to be realised. These targeted investments will be designed in coordination with the Scottish Government’s R100, wireless infill programmes and UK DCMS Local Full Fibre Network (LFFN) programme, to ensure complementarity and added value, and will also support aspirations around the development of healthy ageing technologies and digital learning and remote collaboration.

Island Primary Industries Innovation and Support Programme: Capital funding element of this theme would support the development and enhancement of infrastructure that supports the islands primary industries.

Creative Islands Partnership and Asset Development Programme: Capital funding element of this theme would support the development and enhancement of Island creative infrastructure.

Island Space Industries: specifically Spaceport 1 in North Uist

Skills, Talent Attraction and Entrepreneurial Support Programme: This is largely revenue funding but may include investment in Campus Development at LCC UHI.

Islands Growth Deal Proposals:

Comhairle nan Eilean Siar, along with Shetland and Orkney Island Councils, are currently engaging with UK and Scottish Governments to secure an Islands Growth Deal. This will identify and support investment (largely capital) opportunities in the 3 island groups. In respect of the Outer Hebrides it is anticipated these will be along the themes set out below. Decisions on the level and nature of capital investment is dependent on UK and Scottish Government. This view will be informed through further Business Case Development over coming months:

- *HVDC Sub-Sea Interconnector*
- *Energy Test Beds*
- *Primary Supply Chain Sites to support ScotWind – Arnish Offshore Fabrication Yard*
- *Stornoway Deep Water Port and Newton Marina (Cruise/Energy/Marine/Sailing)*
- *Potential Energy Storage Sites (i.e. Hydrogen storage sites to supply new generation ferries)*
- *Iolaire/St Kilda Centre (Strategic locations of significant cultural heritage sites of National Importance)*
- *Defence Test and Evaluation Sites (Hebrides Range)*
- *Space Port - North Uist*
- Ferry Plan (to support initiatives such as Islands Passport)
- Automated rural filling station rollout centred on community hubs servicing local demand and seasonal tourist influxes.

More detailed information on some of these proposals and other significant Infrastructure and investment sites / projects:

Tourism: Outer Hebrides Destination Development programme seeks investment for Slighe Hiort (Uist, Harris, Lewis), completion of the Hebridean Way, Calanais, Iolaire Centre, and investment in strategic rural roads infrastructure to underpin the Islands Deal aspirations.

Energy: An Islands Centre for Net Zero Carbon is proposed across the 3 islands (hosted by Orkney). There is a further capital investment ask for an Outer Hebrides Energy Hub. Located at Stornoway's Deep Water Port, this multi-energy hub would encompass a range of energy innovations bringing benefits to Stornoway, communities of the Western Isles and the UK as a whole, including:

- a modular Hydrogen Electrolyser powered by nearby Onshore Wind;
- a relocated Stornoway 'Statutory Independent Undertaking' (SIU), LPG network operated by Scottish Gas Networks and distributing Hydrogen through a converted 100% Hydrogen network to 1,500 consumers in Stornoway Town Centre with scope to impact on fuel poverty by extending the network into wider Stornoway area for new domestic, commercial and industrial users;
- a capability to directly fuel Hydrogen powered ships;
- a capability to scale up Hydrogen production, by modular addition to the Electrolyser and associated battery storage, to large volume containerised export

offering a UK first for mass production of hydrogen and capacity to ship to other areas in the UK;

- a relocated Oil Supply Depot, provided through a Public / Private Partnership with DCC / GB Oils / CERTAS and distributing domestic Heating Oil and Fuel Oil by road tanker to commercial and household consumers throughout the islands;
 - a dedicated Marine Fuel Depot, provided and operated by Stornoway Port Authority for the use of local and visiting vessels;
 - a High Voltage Direct Current (HVDC) Centre of Excellence, provided and operated by Scottish Hydro Electric Transmission and based around the new 600MW Converter Station at Arnish.
- **Export of Renewable Energy** Strategic electricity connection – this should remain a key national development, with more detail now worked up since the 2014 NPF. The provision of a 600MW Radial Connector by 2025 will connect up to 600MW of in-island renewable energy generation to be exported to the Grid.
 - **On-island Grid Re-enforcement** continued investment to support renewables generation and reinforcement of existing network to promote resilience.
 - **Arnish** – continues to play a significant role both regionally and nationally. It is the land fall point for the proposed interconnector and can accommodate a range of associated activities.
 - **Deep Water Port:** New strategic port development will provide facilities for a number of initiatives.
 - **Decarbonisation of Heat and Transport**
 - Large scale production of Hydrogen from community owned Renewables (Green Hydrogen) at Arnish Deep Water Port will enable the decarbonisation of Stornoway Gas Network (Hydrogen for Heat) and the Western Isles Ferry Network (Hydrogen for Transport)..
 - With Hydrogen supplying the Stornoway Gas Network, the Local Energy Economy will supply electricity for heat to all areas outwith the Stornoway Gas Network and electricity for transport to a growing Electric Vehicle sector.
 - Grid constrained community Onshore Wind generation can be routed to Electrolysers at Arnish Deep Water Port so community generators can contribute to central Hydrogen production and receive appropriate recompense.
 - Commercial Onshore and Offshore Wind generators will have access to publicly owned Electrolysers at Arnish Deep Water Port in order to export Hydrogen in bulk, either liquefied or through Ammonia Conversion.

- **Outer Hebrides Marine Region & Blue Growth**
 - Publication of Marine Scotland’s Sectoral Plan for Offshore Wind 2020 with identification of ‘Areas of Deployment’ N2, N3 and N4, all of which offer supply chain benefits to the Outer Hebrides.
 - Promotion of island-based Hydrogen production for export from Offshore Wind as an alternative to expensive Grid connection arrangements
 - Promotion of **Arnish Deep Water Port** as a principal Supply Base for Offshore Wind West of Hebrides and the development of West Coast Harbours as fast access sites for marine deployments
 - Embedding of Community Benefit principles in Seabed Leasing (Crown Estate Pilot) and in Regional Marine Planning
 - Strengthening of community input into Seabed Leasing and Regional Marine Planning decision making

- **Space Port 1, North Uist** - involving major players in the UK and international space sector and led by Comhairle nan Eilean Siar (Western Isles Council), proposal to build a new Spaceport at Scolpaig on the north-west coast of North Uist. From this base, rockets will be launched vertically, offering low-cost, safe and efficient access to sun synchronous and polar orbits. In a unique partnership with QinetiQ, who operate the nearby MOD Hebrides Range, the project will benefit from proven launch vehicle technology, existing intelligent systems and access to the largest area of segregated airspace in Europe.

- **Strategic port investment and improvements** at Tarbert (Harris), Lochboisdale (South Uist) and Lochmaddy (North Uist) ports are either required, planned or part in progress to support our crucial lifeline ferry services, support and diversify marine activity, and commercial, tourism and leisure activities.

- **Spinal Route Road investment programme** – investment and maintenance of the main roads networks, causeways and bridges that link the islands chain, with be require particularly in the absence of EU derived funding. A further 90km of A and B class roads, part of the spinal route remain to be double tracked yet. Provision of a fixed link across the Sound of Harris with possible associated marine renewables.

- **Primary Supply Chain:** Strategies and commitments to keep primary supply chain content for Scottish Offshore Wind developments within Scotland (Arnish).

- **Islands as Hubs/Gateways** Recognising the important international role that islands can play in for future transport routes and supply chains e.g. Stornoway Deep Water Port; Stornoway and Balivanich Airport Facilities; Radar and Defence Assets.

- **Island Group Shipping Route** (Cruise).

- **Housing** – recognising the Strategic Housing Investment Plan (SHIP) and the significant degree of windfall (around 61% of house builds) and own build development that occurs in the Islands.

- Draft **Sectoral Marine Plan for Offshore Wind** – potential developments and licensing within Hebrides sector.
- **Barra and Vatersay Community Campus**– multiagency education, health community hub, centralising services and shared facilities on site of existing school provision.
- **Newton Gateway**, large scale development of a register Vacant & Derelict Land (VDLS) brownfield site partly funded by Regeneration Capital Grant Funding (RCGF) support to provide new industrial and commercial serviced sites, and facilitate regeneration of adjacent industrial zone.
- The **Strategic Housing Investment Programme** (SHIP) which aims to deliver affordable housing throughout the islands. Scope for innovation and distinct approaches to housing delivery in rural and island areas where conventional housing markets areas do not function.

NATIONAL DEVELOPMENTS

The Comhairle would propose the following projects for consideration as new or retained National Developments based on their regional and national impact, and their alignment with the 4 criteria.

Existing NPF National Developments:

- No. 4. **High Voltage Electricity Transmission Network** – as stated in this response and accompanying National Developments Response Form the ability to export our renewable energy generation capacity is vital to the national agenda on reduced emissions, a balanced energy system and underpinning the economy of some of our most rural and peripheral places.
- No. 14. **National Digital Fibre Network** – to enable all of Scotland regions to perform and address inequality this still a crucial project in the national interest. Its’ positive impacts will again be most transformative and best deliver on the stated outcome of NPF in our most remote and rural communities.

New proposed National Developments:

- **Arnish Renewables Base** and **Deep Water Port** to incorporate a number of projects including; as part of an Islands Centre for Net Zero Carbon proposed across the 3 islands groups (Orkney, Shetland, Outer Hebrides) a renewables centre in the form of the **Outer Hebrides Energy Hub**; landfall for **interconnector**; and a new **deep water port** which will facilitate regional and national development and innovation. These projects underpin stated outcomes the NPF, existing National Development 4, and align with a number of the national development criteria.
- Development of a **Space Industry** is a project which will diversify the regional economy, and serve an international market whilst building on Place in term of its unique geography offering unhindered airspace and ready established skills and infrastructure basis from Range Hebrides, in the Uists.

- It remains an objective of the Comhairle to extend the transformational provision of fixed links between our islands and from our islands to the mainland. A **fixed link** in the form of a **Minch Tunnel** connecting the islands to the Scottish Mainland is proposed as a National Development. Whilst this is an early stage concept and much feasibility and political oversight has yet to be undertaken, the 2050 vision of NPF, advocates its inclusion at this stage.
- A scheme of **Strategic Port and Trunk Road Improvements**, both sides of the Minch, to support life line ferry traffic to the Islands, partnered with Highland Council and Argyll and Bute Council as appropriate.