

COMHAIRLE NAN EILEAN SIAR NATIONAL PLANNING FRAMEWORK 4

PLANNING POLICY TOPICS

The Comhairle has sought to offer a rural and islands' perspective on strategic policy. The current SPP does recognise the distinct development and socio-economic context of the Islands and the Comhairle would seek that with the enactment of the Islands Act that this is continued and furthered. The specific commitments around re-populations of rural areas in anticipated NPF outcomes is welcomed. 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.

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 and the policy aspects must also address the more immediate short and medium term impacts of Corona.

Air Quality

The current SPP does not address air quality in either placemaking or transport sections. While Paragraph 29 does address impact on air, this is with regard to considering the impact of development on air quality.

Supporting Aquaculture

The current SPP is wholly lacking on explicit guidance in relation to aquaculture. Farmed salmon is now Scotland's largest export. Open Water Marine fish farms are developments of significant scale, are typically EIA developments and can be highly controversial. However when compared to similar developments e.g., windfarms, national planning policy is seriously lacking. Indeed the 2014 SPP saw a significant reduction in the national planning policy and guidance at a time when the industry has grown dramatically with Government support to do this.

Whilst the current SPP does broadly set out what should be addressed in Local Development Plans, supplementary guidance and applications it does need more detail on some critical aspects and would benefit from clarity on where different agencies' responsibilities lie. It is currently unclear in relation to sea lice, fish health, disease management areas and interactions with wild fish populations. This is a weakness of the guidance and leads to uncertainty for local policy makers and developers. Consultees require to input more decisive advice on these matters as the absence of certainty is leaving stakeholders and policy formulation at a local level in limbo. There is a need to set out who is responsible for each aspect of the aquaculture assessment process and better define the planning role.

The Circular 1/2015 does require to be updated reflecting: changes in marine and coastal development and planning: potential changes in foreshore and seabed ownership and control; and to better acknowledge the advent of marine planning.

The NPF4 should recognise that fish farm sites are largely moving out of enclosed loch systems into open coastal waters and give clear guidance on the different issues that are involved in this change of practice. Technology in the industry is evolving and policy needs to keep up with these advances.

Supporting Business and Employment

NPF4 should take into account the Islands Deal and support businesses and employment in all settings including rural and islands. NPF4 needs to recognise the context and challenges are different in rural and island areas. The Outer Hebrides has a higher than average rate of self-employment at 10.7% and a history of working from home, policy should support work being carried out by other agencies to retain and increase working age population in areas suffering decline.

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.

The Outer Hebrides and other island areas can support centres of excellence reflecting regional specialism e.g. aquaculture technology, on and off shore renewables, community led economic development.

A new NPF should be informed by a revised national economic strategy recognising the disparity of investment and growth between the east and west coasts areas of Scotland. This should be reflected in the review of economic development infrastructure and organisations.

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.

Coronavirus The fallout, impact and mechanisms for recovery from the Corona Virus pandemic are still being played out but some of the economic 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. On a positive note however the recent investment in telecommunications infrastructure and e-schooling (e-sgoil) demonstrate the very real opportunities for high value work to be undertaken from home in the Outer Hebrides using technology to undertake high value service sector jobs e.g. finance, scientific, legal while connecting readily with clients and colleagues based in Scotland the UK and worldwide. There is also potential to build on such opportunities in a wide range of educational

sectors using technology and experience in teaching school and University level education (using UHI MODEL) from remote and island communities. The continuation of investment of 4G and 5G in rural areas will be important in supporting business and opening up the many opportunities for rural living and employment to those who will wish to exit urban areas and earn a living in a rural area.

We, as a region, will need to reimagine 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.

Climate Change – Greenhouse Gas emissions Reduction

Climate change should be integral to all parts of the NPF4. Better, earlier and more widespread use of climate risk assessment. Good governance informed by sound science is essential to the creation and maintenance of 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 climate risks that planning policy needs to address or consider. 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.

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.

The Comhairle supports the retrofitting related to energy efficiency for existing buildings as a way to reduce the high rate of fuel poverty experienced within the Outer Hebrides (36%).

However, policy must be tested as to how it can be translated into planning practice. At present the requirement for demonstration of a % reduction in carbon through low and zero carbon technology requires specialisms not held by Development Management Planners, is inconsistent with lesser requirements in Building Standards, requires different calculations to those required for by Building Warrant and confuses the role of Building Standards and Planning. It is absolutely right that buildings be designed so as to minimise their adverse contribution to climate change but the technical detail to achieve it should be tested through Building Standards and not Planning. Planning should seek to secure solar gain, a commitment to ZLCT but it should not be the case that planning policy dictates the imposition of a suspensive planning condition on virtually every building, the condition unable to be discharged until either building warrant is assessed and granted or in many cases the building completed.

Coastal Planning

There is a need to have stronger policies that prevent development close to soft coastline, where there has been a history of Coastal Erosion and flood risk unless for operational reasons. NPF4 should support movement of settlements away from coastline and areas at risk of flooding. Climate Central

(https://coastal.climatecentral.org/map/9/353.6141/57.0762/?theme=sea_level_rise&map_type=coastal_dem_comparison&elevation_model=best_available&forecast_year=2050&pathway=rcp45&percentile=p50&return_level=return_level_1&slr_model=kopp_2014) shows 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 coastal protection. Due to the population levels, the cost per head of the population for coastal protection or remedial works will be disproportionately high and in some cases not viable. Given the landform a breach of the sand dunes due to erosion or sea levels rise in one area has the potential to cause wide spread flooding and damage to the machair system behind the sand dunes.

There is a need to update Circular 1 /2015 to reflect the more diverse ownership and activities now happening in the intertidal, coastal and offshore environments. As an island authority clear policy direction is sought and will underpin effective devolved marine planning.

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, recognising the significance of some of the National Development proposed by the Comhairle in this context.

NPF4 should maximise opportunities for the marine economy in the Islands through continued support for Regional Marine Planning 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.

Community Facilities

With regard to ensuring that the planning system makes appropriate provision for community facilities, criteria could be provided (similar to demolition of listed buildings or outdoor sports facilities) if replacing a facility or demolishing to show that the building is no longer fit for purpose or no longer needed and if replacing that the facilities provided will be equivalent or better than the existing facility and if not at the same site with a reasonable travelling distance.

Some community facilities will be provided during the lifetime of the LDP that have not been identified as a proposal site. This could be as a result of during the preparation stage of the LDP the community facility project might be at an early stage and the site may not be known/secured and therefore having it as a proposal site is not an option. Policies should be flexible to allow new facilities to be provided, even if they are not a proposal site

In terms of community led development the Outer Hebrides now has a track record of community land owning and enterprise trusts often being the main developer of a range of developments including community facilities. There is scope to share and showcase good practice.

Supporting Culture and the Arts

The likely impacts on existing uses of a new venue are already addressed in planning policy and it is considered that there is not a requirement for a standalone policy on this issue. Planning does not currently take into account the financial impact on similar businesses when determining applications. If this starts to be an issue for one type of development e.g. supporting culture and the arts it will be difficult not to apply this to other types of development.

Similar to community facilities, retention of valued and sustainable cultural facilities could be provided by the use of criteria similar to listed building consent or outdoor sports facilities if replacing a facility or demolishing to show that the building is no longer fit for purpose or no longer needed and if replacing that the facilities provided will be equivalent or better than the existing facility and if not at the same site with a reasonable travelling distance.

Again building on the established strong cultural, musical, language and heritage traditions of the Islands national and regional policy needs to recognise and underpin their significance and the development opportunities these create including several significant projects here in the islands e.g. Cnoc Soiller arts and music venue in South Uist. These projects contribute to the tourism experience and the wellbeing and sense of Place of resident populations too.

Digital Connectivity

The Comhairle supports the national roll out of the digital fibre network and the rural programme to increase 4G and successive telecom coverage in rural areas and the retention of Digital Connectivity

as a National Development. NPF4 should ensure that the roll out continues to areas that are currently not serviced by the digital fibre network to ensure that people and business in these areas are not at a disadvantage. The provision of digital connectivity will help attract people to the islands assisting in population retention and employment. There also needs to be promotion of digital services, digital skills and literacy. If this is not addressed, it would lead to a low level of awareness, demand and uptake of digital technologies, which in turn damages the business case for further investment. Ongoing improvements in Digital Connectivity can support remote learning, including the ongoing e-sgoil project which has the potential to sustain and increase population levels. The NPF should mandate the delivery of connectivity standards to rural areas, notwithstanding this it should be noted that NPF3, in conjunction with the roll out projects has been successful in greater digital connectivity and would be best supported by an updated Planning Advice Note to compliment NPF4. While there has been ongoing collaboration on several recent projects, the Comhairle would welcome a more strategic, planned approach to the delivery consenting process for digital infrastructure projects by providers and those contracted to deliver the roll out of digital communications.

Delivering Electricity

NPF4 should provide a definition of repowering and provide considerations when dealing with repowering applications. This is going to become increasingly important where existing wind farms are coming to the end of their life.

NPF4 can support strategic energy infrastructure by identifying these projects as national interest. For example the interconnector to the Outer Hebrides was named as National Development in NPF3. Identifying and providing continued support for the interconnector will enable access to the currently unharnessed renewable capacity within the Outer Hebrides.

There is also the opportunity to support local energy production for local consumption. This could potentially allow development of renewable energy technologies in areas where there is not national grid capacity.

Clarity should be provided on the weight to be attached to the benefits associated with the provision of renewable energy generation, relative to other considerations, and to whether the balance of protecting the natural heritage assets extends to Wildland and NSA's only. Recognising that a high proportion of the Outer Hebrides is covered by natural heritage designations. (National Scenic Areas (36.5%) Ramsar Sites (21.8%), SSSI (11.7%), SAC (18.5%) and SPA's (22.7%)). Continued guidance should be provided on the development of peatland and the need for peat loss calculations to accompany such proposals, including the use of peat depth mapping and the carbon calculator.

NPF4 can support policies to use combined heat and power where this is possible to produce hydrogen to release additional renewable energy capacity. There is opportunity to develop local supply chains across a range of emerging and growing markets for local energy systems across all regions of Scotland – thereby, providing potential for more balanced regional development within Scotland. The proposed National Development Outer Hebrides Energy Hub would demonstrate this.

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.

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. NPF4 should provide continued support for community ownership and recognise the clear local economic benefits that can result from such arrangements, whilst providing clarity on the approach to be taken in the assessment of proposals to the separate provision of community benefit funds.

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, 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.

The proposed National Developments of the Outer Hebrides Energy Hub and retention of the High Voltage Electricity Transmission Network would facilitate and showcase the points made above.

Delivering Heat

NPF4 should promote and develop statutory minimum requirements of 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. However, there needs to be recognition that in rural and island areas heat networks are not so easily achieved, particularly where settlements have a sparse layout and new development tends to be of a smaller scale and lower density.

Fuel poverty in the Islands is prevalent and requires policy support as well as fiscal measures to address it.

Flooding

In order to take a proactive approach to avoiding and reducing flood risk, the preparation of the NPF and LDPs should take into account working being carried out within the Flood Risk Management Strategies.

There is a need to safeguard land that is required for current and future flood management taking into account climate change and rising sea levels. The current policy and guidance from SEPA is quite clear about the types of development that can happen in each type of flood risk area however, further guidance should be provided on the impacts of climate change and protecting land taking climate change into account. The lifespan of new buildings is approximately 80 years and therefore

there is a chance that some building currently being built in areas not at risk of flooding will in 20-30 years be located within areas at risk of flooding.

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).

Policy should also take into account the effects of rising sea levels and climate change on water tables and the effect of pluvial and fluvial flood risk.

While planning can encourage new developments to be resilient to increased flooding this is more of an issue to be addressed through building standards.

As discussed under climate change, it is predicted on Climate central web page that there will be increase in the areas at risk from flooding within the Outer Hebrides, in particular in the Uists and Benbecula. It will be unfeasible to provide flood defences to all of these areas. NPF4 should provide guidance on where relocation of settlements is required.

Green Belts

None

Maximising the Benefits of Green Infrastructure

There is potential for green and blue infrastructure to support wider objectives on climate change and any of these areas which provide flood risk management services should be safeguarded.

While the Outer Hebrides has not historically had allotments there is a history of crofts. In Benbecula there are a couple of community growing areas/ poly tunnels where people have raised beds for growing fruit and vegetables, some of this produce is sold locally. Throughout the Outer Hebrides there are community polycrubs being erected (for example at local primary schools and close to housing) supported through community land ownership and community organisations.

The NPF4 should recognise that land management methods in the islands have contributed to green infrastructure and biodiversity. This is demonstrated by the number natural heritage designations.

Any national standards will need to take into account different requirements for rural and island areas.

Gypsy / Traveller Accommodation

The Comhairle's HNDA recognises the needs to provide suitable accommodation for a range of housing needs including those of the Gypsy/Traveller community, however there has been very limited/no demand previously, and no recent evidence to support the provision of permanent sites, either via homeless presentations, social housing applications, or direct requests. Travelling Show People come to the Islands infrequently. Their visits are pre-arranged and of short duration allowing appropriate ground to be designated as temporary show sites in line with local planning policy. The

Comhairle will continue to support Gypsies/Travellers on an ad hoc basis as any requests arise, being fully aware of their human rights and associated equalities issues.

Health

The local Health Boards should be a consultee during the SEA process for housing proposal sites and should be able to give advice on whether there are sufficient health care facilities in the area or if more are required as a result of the development. Where a major housing development is received which was not identified as a proposal site within the LDP then the health boards should be a consultee for the planning application so advice on health care facilities can be provided.

The current policy does not explicitly support the promotion of mental wellbeing. However, it is generally recognised that the provision of easy access to open spaces will encourage the use of these spaces which will have a benefit to both mental and physical health. Consideration to how different people use spaces must be taken into account and with provision of both active and quiet outdoor space.

While the transport hierarchy promotes active travel and use of public transport there are areas within the islands and rural areas where the public transport is poor and the use of active travel is not safe or convenient and it is difficult to access a range of jobs or health care facilities without the use of a car.

Valuing the Historic Environment

At a strategic level the existing policies are sufficient to safeguard valuable historic assets. However, it is important that other guidance which provides the detail on how these policies will be implemented is maintained (e.g. PAN 2/11). Locally important historic or archaeological interests should be addressed in LDPs.

Enabling Delivery of New Homes – Affordable

The policy does need to reflect different local circumstances. Within the Outer Hebrides Local Development Plan all the housing allocations are for affordable housing, as private houses are built on windfall sites. As a result it has been difficult to predict the requirement for non affordable housing. The scale of development of affordable housing sites in the rural parts of the islands is significantly smaller than urban areas and can vary in size from one to ten houses.

It is important that affordable housing has a high quality of design and located in the right place to encourage retention/ repopulation of the islands. This impacts the sustainability of local services, especially schools. Lack of accessible and affordable housing is a barrier to attracting families to island communities.

Furthermore, SPP needs to reflect different local circumstances in regard to what is considered affordable housing and the provision available for that. Crofter housing was historically recognised as affordable housing, in that the available grants for housing made working the land and generating a living from it an affordable prospect for many islanders, and in turn, allowed communities to be sustained and to prosper. Consideration should be given to how rural communities can be supported, how croft land – which is a finite resource – can be managed and planned for with

relevant regulatory bodies, and how tracts of land can be made available for the affordable regeneration of existing, or generation of new, rural communities.

There is very limited volume house building and only one RSL in the Outer Hebrides. The need for discretion on terms of distinct and responsive approaches to affordable housing delivery is required in NPF4 for rural and islands areas.

Enabling the Delivery of New Homes

The 5 year effective land supply method and nationally determined housing targets do not work for the Outer Hebrides for a number of reasons including; the distinct land ownership/crofting tenure set up; limited volume house building; significant single and self-build on windfall sites; a single main RSL; two dysfunctional and incomparable Housing Market Areas which do not operate like conventional HMAs; and hidden and very localised housing demand. This, along with significant build costs, all advocates for a discretionary policy and grant funding/fiscal approach for housing delivery in the Outer Hebrides.

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. 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. Furthermore, and with particular regard to low-income households, the availability of infrastructure – schools, transport, recreational facilities etc. – will often be the deciding factor in area preference. The same applies to households where additional needs are required i.e. access to healthcare/mental healthcare, specialist education support, addictions support and so on.

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, wheelchair accessibility targets; 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.

In terms of climate change, as the majority of island settlements are coastal, it is necessary for planning policy to have regard to the very real possibility that settlements within the islands will have to be moved or redeveloped at short notice in response to rising sea levels at some point.

Enabling the delivery of New Homes – Specialist Housing

The Comhairle supports the provision of specialist housing and in recent years has seen the inclusion of adaptable housing and sheltered accommodation being provided within development.

Building Standards already require houses to be built to be adaptable (i.e. plug sockets a certain distance from the floor, a bedroom or a room that can be converted to a bedroom on the ground floor, downstairs bathroom and wider corridors and a ramp to one of the external doors). The policy should not replicate provisions made through other legislation, but should reinforce, for example, the requirement for housing to, as a minimum comply with the design criteria indicated as a ‘basic’ requirement for wheelchair users, as outlined in Housing for Varying Needs (HfVN).

As with other aspects of housing planning, the HNDA and Housing Market Areas approach, process and robustness should continually be reviewed and assessed.

Infrastructure Planning and Delivery

Consideration of the impact of infrastructure first approach on island development and growth needs to be taken into account. The scale of development within the Outer Hebrides is small but there is a higher build cost due to the cost of getting materials to the islands. All of the larger housing developments are for affordable housing and private housing development is generally single houses. If an infrastructure levy was implemented it is likely that development will slow down significantly as erecting any new building will become uneconomical – some are near non-viability as is.

The scale of development in the islands can be small but still needs to be underpinned by strategic infrastructure which is costly. Because of the scale of development infrastructure providers and utilities are harder to engage with.

Promoting responsible extraction of resources

As councils are required to have a 10 year mineral land bank of permitted reserves for construction aggregates all times in all market areas it is not considered that moving to a 10 year development plan will have implications.

The Comhairle supports the use of areas of search for new quarries but considers that a criteria based approach is appropriate in certain circumstances.

In the Outer Hebrides LDP, the Comhairle has a set of issues that all have to be addressed to the satisfaction of the Comhairle when considering mineral extraction proposals these address impacts on local communities, the environment and the built and natural environment.

The Comhairle supports the current SPP which states that “Local development plans should safeguard all workable mineral resources which are of economic or conservation value...” The

Comhairle would not support a national hierarchy of minerals, which results in some minerals being safeguarded but not others.

There is sufficient policy advice on restoration procedures and biodiversity gains.

It is considered that the existing policy on borrow pits strikes the right balance between environmental and economic benefits.

Valuing the Natural Environment

The SPP provides clear guidance on when development will and will not be supported within International and National designations. This criteria should be retained. Providing strong criteria will protect the important natural environment assets against development, which will have a significant impact.

In a similar way to climate change biodiversity should be integrated though out relevant topics. Policy should be general so that the policies can be applied across different scales of development and in different locations.

Opportunity should be taken to recognise 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.

Clarity around the perceived versus actual status of wildland would be welcome – it is in effect a designation in every way other than its actual status.

Preserving Peatland

In the Outer Hebrides peat has been cut for domestic fuel and for some local businesses (for example smoking fish) historically. As there are relatively few trees on the islands, wood is not readily available as an alternative fuel to peat. There are also few areas of peat which will benefit from restoration.

There needs to be clear guidance when the policy relating to peat will be applied currently the SPP guidance to carbon rich soils is aimed at wind energy development. The definition of peat and carbon rich soils needs to be consistently defined across Government and National Organisations.

Policy needs to provide some dispensation for development on peatland within the Outer Hebrides, due to the amount of land covered in peat and in most circumstances development on peatland is unavoidable. This is going to increasingly become the case as areas on the west coast which are covered in machair have the additional constraint of flood risk.

Emissions sequestration – this is an issue that could be addressed in major development and there should also be some flexibility for local authorities to include certain types/ other sizes of development, but it should not be compulsory for all development as within the Outer Hebrides this has the potential to constrain development.

Clear guidance should be provided about other land types which could be protected due to their contribution to greenhouse gas emissions reductions, but it should be the local authorities decision

to the level of protection, this is to ensure that in areas where there is a high percentage of these land types and other carbon rich soil that development is not unreasonably constrained.

Placemaking

Embedding the Place Principle across disciplines ensures 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.

The current policy seems more suited to cities and towns or large scale development. It is currently difficult to apply all of the six principles of a successful place in a rural context where the majority of new development is small scale (single houses) on windfall sites. While supporting that high quality design and placemaking is required there needs to be some flexibility for rural islands on how this will be achieved without watering the policy down for urban areas.

Rural Development

While repopulating rural areas is supported. 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. 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.

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 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; and growth in short term lets for tourism.

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).

The policy could be framed by having different criteria for different types of rural areas. Similar to the way the development strategies are set out in Local Development Plans taking into account the

unique characteristics of the areas. The Comhairle would support the retention of a differentiated policy approach for different categories of rural areas.

And, yes as demonstrated in the Development Strategy of the Outer Hebrides Local Plan, (subject to broader Plan policies) a more permissive policy approach is required for our settled rural areas in order to support and facilitate development, balanced with more management in the remoter areas, out-with settlement and offshore unhabituated islands.

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. 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.

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 there is an opportunity going forward to put in place a territorial policy and delivery framework (local and regional) that is better targeted, better reflects the needs of rural Scotland and is better focused on outcomes.

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.

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.

National policy should not be introduced to promote leisure accommodation, such as hutting and other recreational accommodation in rural areas. This should be left to the discretion of the Local Authority.

Sustainability

Yes the presumption in favour of sustainable development should remain a component of the NPF. Sustainability of development will contribute to the climate change agenda. The issue of sustainability should be addressed the same way as climate change. If climate change is going to be integral throughout the NPF then sustainability should be the same. However, if climate change is going to be an overarching policy then so should sustainability.

The NPF should encourage an increase in opportunities for community engagement but should not be too specific in how this happens as different sizes of communities will engage in different ways and flexibility on how this is achieved should be given to the local authority.

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.

Tourism

Recognising the tourism's multiplier effect and 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 geographic reach from service centres to remote rural communities through accommodation, food and drink, activity provision, croft diversification projects etc. This has been sharply demonstrated by the current Coronavirus crisis. 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.

While it is supported that housing for residents needs to be protected, policy wording needs to be careful to balance the needs for residents and short term let and some flexibility to the local authority needs to be provided to ensure local needs are met. 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. An example of how the balance can be achieved outside the planning system is in Harris where a community land lord has sold land for housing but it is in the title deed that the house will only be used as a primary residence, to prevent them being used as holiday homes in the future.

Promoting Town Centres

While town centres are generally suffering from decline as a result a number of issues including out of town shopping centres and online shopping, recognition should be provided to the town centres in rural and island communities that contain independent shops and have not suffered as much decline. The dynamic of town centres in rural and island areas are different: often having a higher functionality than their immediate resident population as they provide for a wider hinterland; and have no or limited competing centres in proximity. This will require a different policy tact.

Promoting Sustainable Transport and Active Travel

While the transport hierarchy promotes active travel and use of public transport there are areas within the islands and rural areas where the public transport is poor and the use of active travel is not safe or convenient and it is difficult to access a range of jobs or health care facilities without the use of a car or good public transport. It is also important that work is concurrently carried out on changing people's attitude to active travel.

Any provision requiring the provision of shared transport such as car clubs and revised parking standards and limiting access for private cars and car free developments should take into account rural areas and islands where for the reasons set out above the use of a private car is required. As a result a level of flexibility should be provided to local authorities to reflect local situations.

The Comhairle supports public transport connectivity for longer journeys particularly with regards to public transport from ferry ports on the mainland to allow residents on the islands to make onward journeys. While from some ferry ports there is a bus service which meets the ferry in other ports there is a delay of over an hour between the ferry arriving and the onward connection using public transport.

The capital on-cost, maintenance and dependency of vital transport infrastructure in island communities, tempers investment and limits development to minimal requirements with limited scope of capacity for innovation.

Vacant and Derelict Land

The Comhairle in its LDP Development Strategy does within Stornoway Development Area seek evidence that use of brownfield sites have been assessed before greenfield sites.

Waste

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.

NPF 4 should continue to support the zero waste plan, the waste hierarchy and the working with SEPA to reduce waste. At the same time work needs to be done to reduce the levels of consumerism to reduce levels of waste.