



We're making Plans for the Outer Hebrides

Your Plan - Your Voice

Outer Hebrides Local Development Plan

MAIN ISSUES REPORT & ASSOCIATED DOCUMENTS – RESPONSE FORM

RESPONSE DETAILS

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PLAN VISION AND OBJECTIVES

Q1. Is this the right Vision and Plan Objectives?

The vision you have outlined does not suggest any particular spatial emphasis or where there may be a chief focus for activity and investment. There is no sense of the scale and degree of change anticipated in the vision.

Are there any alternatives?

POLICY ISSUES

Q2a. Do you agree with our preferred options for Issue 1 the Development Strategy? If not tell us why.

Town Centres

The Town Centre First Principle jointly developed by Scottish Government and COSLA encourages the public sector to continue to invest in town centres and help communities thrive. It asks that the health of town centres features in decision-making processes. Since the current Outer Hebrides LDP was adopted (November 2012), the new Scottish

Planning Policy (SPP) has been issued (June 2014), which extends the town centre first approach (to apply it also to offices, community and cultural facilities and uses which attract significant numbers of people) - the emerging LDP should ensure it follows the approach for town centres set out in SPP.

SPP sets out the town centres first approach, and provides particular guidance for island areas - noting that in remoter rural and island areas it may not be necessary to identify a network of centres. Notwithstanding that, we support the proposal to create a new category within the spatial development strategy for Stornoway. This recognises its particular role as the main centre and as a focal point for investment and connections, and fits with the town centres first approach.

SPP expects development plans to adopt a sequential town centre first approach when planning for uses which generate significant footfall. It notes that planning authorities should be flexible and realistic in applying the sequential approach to ensure that different uses are developed in the most appropriate locations. In light of the islands context we would accept that a flexible approach be put in place, in particular to ensure that community, education and healthcare facilities are located where they are easily accessible to the communities they are intended to serve. The MIR sets out the Comhairle view that, in the local context, a prescriptive approach to development within the settlement hierarchy is not appropriate. This position is very much consistent with the town centres first approach as it appears in SPP; a sequential approach, allowing for local flexibility and not requiring blanket presumption against development outwith town centres. As such, therefore, we would still expect the Proposed Plan to set out a town centres first policy (covering the full range of town centre uses expected by SPP), and that it would build in the flexibility envisaged by SPP.

We welcome the commitments set out in the Monitoring Statement to review policies: 17 – Retail and Service Provision and 18 - Stornoway Retail and Stornoway Town Centre Areas to reflect the new SPP.

The Scottish Government's Local Housing Strategy Guidance and SPP (paragraph 60) encourage local authorities to consider opportunities for promoting residential use within town centres where this fits with local need and demand, and consider the role town centres can play as residential communities. The Council should consider whether there are sites within central Stornoway that could be opportunities for town centre living.

Housing

HNDA and Housing Figures

Paragraph 113 of Scottish Planning Policy sets out that "*Plans should be informed by a robust housing need and demand assessment (HNDA) prepared in line with the Scottish Government's HNDA Guidance. This assessment provides part of the evidence base to inform both local housing strategies and development plans (including the main issues report)*".

We note that the MIR has been issued prior to conclusion/publication of your Housing Needs and Demands Assessment (HNDA). We would have expected the HNDA to

have been completed before the publication of the MIR in order to inform and enable debate on the Housing Supply Target (HST) and Housing Land Requirement (HLR) within the MIR. It would therefore be helpful to receive clarification why the HNDA has not been completed in time to inform the MIR and your proposed timescales for completing the HNDA prior to publication of the Proposed LDP.

In taking forward the Proposed LDP, you should ensure that the HST is based on evidence from the HNDA. Paragraph 115 of SPP applies.

Windfall Sites – Contribution to Housing Land Requirement

We note from page 12 of the MIR that nearly 70% of housing in your authority area is delivered through single self builds on windfall sites. Paragraph 117 of SPP sets out that any assessment of the expected contribution to the HLR from windfall sites must be realistic and based on clear evidence of past completions and sound assumptions about likely future trends.

Our recently published [Draft Planning Delivery Advice on Housing and Infrastructure](#) provides additional information on the role of windfall sites and how they may be particularly important in rural and island authority areas due to the contribution they can make to the overall supply.

We would therefore expect assumptions for windfall developments to be based on sound evidence and explained in the Proposed LDP.

Specialist Housing Provision

It was not clear whether there are requirements for specialist housing and other specific housing needs. Paragraphs 132-134 of SPP set out how HNDAs and development plans should consider and address such needs, where applicable.

Effective Housing Land Supply

SPP requires that development plans should provide clear evidence of how the 5 year supply of effective housing land is to be met and maintained. When taking forward your Proposed LDP you may wish to consider the [Draft Planning Delivery Advice on Housing and Infrastructure](#) which provides advice on this matter. In particular paragraph 26 states that “*Planning authorities may wish to consider including a ‘flexibility policy’ in development plans to set out how individual proposals will be considered where a shortfall in the 5 year supply of effective housing land supply emerges – as evidenced by the Housing Land Audit. Such a policy can provide criteria for considering proposals for housing on land which is not allocated in the development plan. It may also include support for sites that are identified for the longer term but which could be delivered earlier and address infrastructure constraints*”.

New Category: Marine

We welcome the fact that your MIR clearly signals intent for the creation of a new section on ‘marine’ to include recognition of emerging marine planning. This will provide an opportunity to reflect National Marine Plan planning policy and consider opportunities for alignment of terrestrial and marine planning functions.

New Category: Stornoway

We support the recognition given in the MIR to Stornoway’s unique development context and NPF3’s identification of Stornoway as a key port and a focal point for investment and connections. To expand on this, paragraph 2.38 of NPF3 states that Stornoway’s harbour is well placed as a stopping point for international shipping with the opening of the North East Passage to navigation. It also has significant potential as a destination for cruise ships and leisure craft. This is reiterated in paragraph 5.37 of NPF3 which anticipates longer-term opportunities arising from the opening up of new shipping routes across the Arctic. And that several deep water assets, including at Stornoway, may present opportunities for new or expanded ports to take advantage of this and of wider opportunities, including for tourism development.

In recognition of Stornoway as a ‘new category’ it will be important to fully explore the opportunities referred to in NPF3 and to consider in the MIR what the land and infrastructure needs and planning approach might be in relation to these.

On ports generally, paragraph 283 of the SPP states that Planning Authorities and port operators should work together to address the planning and transport needs of ports. Planning authorities should ensure that there is appropriate road access to ferry terminals for cars and freight, and support the provision of bus interchange facilities. The degree to which these requirements are relevant to the port in Stornoway and elsewhere in the Western Isles should be considered in taking the Proposed Plan forward.

New Category: Offshore Islands

We would welcome clarity on your policy approach to the New Category: Offshore Islands, to ensure it is consistent with the principles of rural development contained within National Planning Framework 3 and Scottish Planning Policy.

Do you favour the stated alternatives?

Q2b. Do you agree with our preferred option for **Issue 2 Design and Placemaking?** If not tell us why.

We consider that with Placemaking now featuring as a principal policy in SPP, consideration should be given to the use of holistic placemaking tools such as the Place Standard to assist in all approaches to placemaking processes: to promote well-being and lead to overall higher quality of life <http://www.placestandard.scot/#/home>.

Your preferred approach and the proposal to bring the Supplementary Guidance for car parking and roads layout into the plan and make it a tool for placemaking and design is welcomed. This approach is supported by paragraph 280 of the SPP which states that the design of all new development should follow the placemaking approach set out in the SPP and the principles of Designing Streets. On parking standards generally, paragraph 281 of the SPP discusses national parking standards as set out in ANNEX B

of the SPP. We appreciate this level and type of development might not be applicable to the Western Isles but mention it for consideration particularly in light of your review of the existing Supplementary Guidance.

Q2c. Do you agree with our preferred option for **Issue 3 Minerals?** If not tell us why.

SPP Paragraph 288 establishes the approach to maintaining a landbank of permitted reserves and promotes the identification of areas of search for construction aggregates. If the audit proposed identifies a sufficient landbank, a criteria-based approach to maintaining the landbank, rather than specific site identification, is promoted by SPP.

Do you favour the stated alternatives?

Proposed Alternative 2 is potentially viable in a situation where the preferred Option A audit reveals a sufficient landbank or substantial unconstrained construction aggregate deposits. The final policy approach would however need to also provide for safeguarding workable resources.

Proposed Alternative 2 could be compliant with Scottish Planning Policy, where it is matched with a resources safeguarding policy.

Q2d. Do you agree with our preferred option for **Issue 4 Newton?** If not tell us why.

In taking forward proposals for the Newton Area you should note that Paragraph 96 of the SPP states that development plans should support opportunities for integrating efficient energy and waste innovations within business environments could be considered. In addition the requirements set out in the SPP on the development of sites for business should be taken into account and that where an existing site no longer meets current needs, reallocation to enable a wider range of viable business or alternative uses should be considered. This may be relevant at Newton and potentially elsewhere within the Plan area.

We note the statement on page 13 of the MIR that increasingly, small or embryonic businesses are being established in or in proximity to individuals homes and that appropriate Plan policy will be required to manage this effectively. We recognise this statement and you should take account of SPP which states – Plans should encourage opportunities for home-working, live-work units, micro businesses and community hubs. The plan should consider the need for such provision and set a policy approach as appropriate.

Do you favour the **stated alternatives?**

Q3. Are there any other planning topics which should be considered as a **Main Issue?**

Waste

Please ensure that the following is addressed in the Proposed Plan.

We note that waste is not dealt with in the MIR as an issue. The Monitoring Statement states about policy 8: Waste that: “SEA monitoring highlighted issues of excessive landfill and unnecessary use of new materials contributing to climate change (% of municipal waste currently recycled is lower than Scottish average), and contribution to the implementation of waste strategies aimed at increasing recycling, reducing waste and reducing landfill. The need to address peat waste and the management of excavated materials as part of development was also raised”.

The monitoring statement suggests there is more that could be done to reduce landfill and use of new materials. It is not clear why waste has not been addressed in the MIR. The proposed development plan policy on waste management should therefore be updated in response to the issues highlighted in the monitoring statement.

The Scottish Government Waste Management Advice states in paragraph 15:

‘As the first statutory stage of plan-making, the MIR can consider the potential to manage all waste more effectively in the context of the plan’s proposed strategy.’

We would also draw the Council’s attention to paragraph 181 of SPP which states that planning authorities should have regard to the annual update of required capacity for source segregated and unsorted waste. The latest waste capacity tables are available on the Scottish Government’s website. <http://www.gov.scot/Topics/Environment/waste-and-pollution/Waste-1/wastestrategy/annexb/annexbDec2011>

Green Infrastructure/Open Space

We note that Green Infrastructure / open space has not been identified as a main issue. We would encourage you to ensure that the subsequent proposed plan complies with SPP.

The MIR however sets out as part of the ‘Other Key Issues’ that it will be reviewing policies 24 and 35 Recreation Assets including considering a play parks audit and looking at the allotments policy.

The current Policy 25: Open Space in the adopted LDP says that “*The provision of new open space as part of a development may be required. This will be determined by the Comhairle appropriate to the scale of the development proposed. It will be dependent on the proposed use as well as the potential and needs of the site.*” In taking forward the Proposed Plan there may be scope to set out greater clarity to applicants and developers as to what level of provision the Comhairle is likely to consider appropriate.

Scottish Planning Policy (paragraph 225) states “*Local development plans should seek to enhance existing and promote the creation of new green infrastructure, which may include retrofitting. They should do this through a design-led approach, applying standards which facilitate appropriate provision, addressing deficits or surpluses within the local context. The standards delivered through a design-led approach should result in a proposal that is appropriate to place, including connections to other green*

infrastructure assets. *Supplementary guidance or master plans may be used to achieve this.* We expect the Proposed Plan to, or include an appropriate connection for Supplementary guidance or masterplans to, set out an approach to the provision and enhancement of green infrastructure which complies with that set out in SPP.

Allotments

The MIR indicates that the policy on existing allotments will be reviewed, we would also encourage the Comhairle to think about potential new allotment sites if there is a demand in the area. SPP also states that *“Plans should also encourage opportunities for a range of community growing spaces”* as such we would look for the Proposed Plan to encourage such opportunities to comply with national policy.

PROPOSAL SITES

Q4a. Do you agree with our Proposal Sites? If not tell us why.

Paragraph 2.38 of NPF3 states that Arnish is part of the low carbon/renewables north enterprise area. NPF3 also identifies Arnish as an existing NRIP site. It is not clear how successful the site has been to date and whether action is needed to progress the site further. Given the national status of the site it is considered that the MIR presents an opportunity to review the approach to the site and examine whether any action is required that can be delivered through the development plan.

Q4b. Are there others sites which may be suitable to allocate as **Proposal Sites**?

OTHER KEY ISSUES

Q5a. Do you feel that a significant new Development Plan Approach is required with regard to other key policy issues listed? If so please explain.

Low Carbon Travel

We note the reference in the MIR to assessment of the need for policy on low carbon travel and alternative fuel outlets and would support policy to this effect. NPF3, in the section on Stornoway on page 27, states that infrastructure for electric and hydrogen fuelled vehicles is being explored. This is supported by paragraph 5.30 of NPF3 which supports providing infrastructure to support greater use of low carbon fuel options, referring to electric vehicle charging points. Paragraph 289 of the SPP supports this approach stating electric vehicle charging points should always be considered as part of any new development. In addition paragraph 5.38 of NPF3 states that ferry terminals provide a useful focal point for charging infrastructure, and electric vehicle rapid charging points are already available or planned at ferry terminals in the

Western Isles. Given this position it would be useful to include policy in the proposed plan supportive of such provision and perhaps indicating where current provision exists.

It will be important to integrate provision for low fuel parking into the revision of the SG on parking standards.

Additionally on low carbon travel, paragraph 5.33 of NPF3 states that to achieve a step change in active travel, walking and cycling networks will continue to develop through core path plans and local community networks, connecting where possible with the national long distance network. The Hebridean Way is one of the routes identified in National Development 8 of NPF3. While we appreciate that there may be limited opportunities to connect local routes with the Hebridean Way it is not clear whether this has been assessed or to what degree this can be promoted. In preparation of your proposed plan you could usefully set out if there are any particular aspects of the Hebridean Way (e.g. new route development or upgrade) that might be able to be delivered as part of the plan.

On the Hebridean Way we note the intention under Other Key Issues to review the need to identify and give policy protection to wider tourism recreational assets in the Plan, including the Hebridean Way. We would support such a review and refer to National Development 8 – Long Distance Cycling and Walking Network and the particular purpose envisaged for such routes to be integral to any review and subsequent policy approach developed. Cognisance should also be given to the project plan being led by SNH and how this might relate to any review of the Hebridean Way and provision that might be made in the development plan <http://npfactionprogramme.com/national-developments/08-national-long-distance-cycling-and-walking-network/>.

Paragraph 273 of the SPP states that plans should promote active travel networks and promote opportunities for travel by more sustainable modes in the following order of priority – walking, cycling, public transport, car. We appreciate that there may be limited scope to apply this hierarchy in the Western Isles but wonder if there are any opportunities to identify and safeguard key active travel routes and in particular promote the movement hierarchy in Stornoway.

Paragraph 275 of the SPP states that development plans should identify any new transport infrastructure. We note that this has been considered as part of the background report on Infrastructure and Environment and that transport infrastructure has been identified. The SPP continues that plans should indicate how infrastructure is to be delivered. It will be important for the proposed plan to address this.

Paragraph 276 of the SPP states that in rural areas the development plan should be realistic about the likely viability of the public transport services and innovative solutions such as demand responsive public transport and small scale park and ride facilities at nodes on rural bus corridors should be considered. It is not clear to what degree these have been considered as part of the MIR.

Paragraphs 279 and 287 of the SPP refer to significant travel generating uses. If any such uses are proposed or anticipated, development should proceed in accordance with the requirements of these paragraphs.

You should note that some of the content of paragraph 284 of the SPP on airports may be relevant to any plans that may exist for Stornoway airport and should be considered as part of the MIR.

Climate Change

Although the vision does include sustainable use of resources there isn't a strong sense of the need for significant action on emissions reduction. This should be considered alongside our national targets for an 80% reduction in greenhouse gas emissions by 2050. In doing so it may be that further, more significant action, is required on emissions reduction than is set out in the Climate Change, Energy and Infrastructure key issue on page 16.

We note that the Western Isles have acknowledged in the Monitoring report that Policy 19 may need to be revised in light of the revision of SPP in 2014 and specifically with regards to heat. The main issues report highlights that a new approach is required with regards to climate change energy and infrastructure. The new planning advice on planning and heat (2015) is useful in considering what is required within the local plan with regard to SPP. <http://www.gov.scot/Resource/0048/00488003.pdf>. Without further detail on what is proposed at this time it is difficult to comment further at this stage.

The energy and emissions challenges facing the country and the aspiration for change are set out on pages 30 to 38 of National Planning Framework 3.

Under the broader climate change and infrastructure theme - the plan should be acknowledging the increasing risks of extreme weather events, the implications this could have on flooding in coastal and inland areas and the need to plan for further resilience in the island communities. The introduction of Flood Risk Management Strategies across Scotland will have some impact on addressing major flooding issues and the plan should take account of any land use implications or land take requirements for new flooding infrastructure within the area. We would recommend reference to <http://apps.sepa.org.uk/FRMStrategies/outer-hebrides.html>

Q5b. Are there other planning topics which may require minor review or updating?

Current Policy 3 of the adopted plan does not include a 'specified and rising' proportion of greenhouse gas emissions to be saved, as required by Section 3F of the Town and Country Planning (Scotland) Act 1997.

The current approach does not accord with Section 3F of the Town and Country Planning (Scotland) Act 1997.

SUPPLEMENTARY GUIDANCE

Q6. Do you have any views on our proposals for Supplementary Guidance at this stage?

STRATEGIC ENVIRONMENTAL ASSESSMENT

Q7. Do you have any comments to make on the accompanying Strategic Environmental Assessment 'Environmental Report'?

GIVING YOUR VIEWS

We would like to hear your views on each of the issues covered but we appreciate you may only wish to respond to some. Please note that your views cannot be treated confidentially. Your comments need to be received by 5.00pm Friday 26 February 2016. Please email your completed form to:

localdevplan@cne-siar.gov.uk

or post to:

Development Department,
Comhairle nan Eilean Siar,
Sandwick Road,
Stornoway,

For further information on the Outer Hebrides Local Development Plan please visit:

www.cne-siar.gov.uk/planningservice/localdevplan.asp

If you want to get in touch to discuss any aspect of the **Plan**, please contact:

Development Plan and Marine Planning Team

Comhairle nan Eilean Siar

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*Thank you for getting involved in the
Outer Hebrides Local Development Plan
Process.*

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