

Local Government and Regeneration Committee
Scrutiny of the Draft Third National Planning Framework



Comhairle nan Eilean Siar

Proposed National Planning Framework 3

The Comhairle welcomes the opportunity to review the proposed NPF3 and provide feedback to the committees of the Scottish Parliament. The key positive outcomes and unresolved issues of concern to the Comhairle are noted below:

The Comhairle would question and seek further clarification on the following points:

- The Areas for Co-ordinated Action (AOCA) proposed by the Comhairle (Western Seaboard and Outer Hebrides) have not been included. Although many of the assets identified in the proposed bids have been integrated into the document, the Comhairle still feels that the significant potential of Scotland's West Coast has been overlooked and merit acknowledgement as a distinct AOCA (pg 26) for co-ordinated action and master planning. We would re-iterate the Comhairle's proposal for the inclusion of a *Western Seaboard AOCA* as submitted in its formal response (see summary below).
- While the Comhairle welcomes the inclusion of the 'Lewis and Harris' section of the *Hebridean Way* in the National Long Distance Walking and Cycling Route National Development, clarification is sought on why the route is not listed under the national development description on Page 53, and why the 'Uists and Barra' section of the Hebridean Way has not been included.
- While *Arnish* is identified as an NRIP site, the *Coastal and Islands* sub-section of *A Low Carbon Place* fails to acknowledge its importance in supporting the renewables industry and its significant potential for growth and investment.
- There is reference to support for the renewed interest in *hutting* (recreational huts in the countryside) but there is still no clarification or definition on this; the practicalities need to be well thought through prior to inclusion. The Comhairle would reiterate the points made on this issue in its formal response, particularly on: provision of infrastructure, visual/cumulative impact in open landscapes, and use-class definition.
- There is clear direction that 'wind farms' in National Scenic Areas will not be supported, but there is still no clarification as to the threshold classification of a 'wind farm'.
- There were questions on safeguarding Core Areas of Wild Land in the NPF3 MIR consultation paper but there is no reference to Wild Land within the proposed NPF3 – has the Scottish Government's position on mapping Wild Land changed?
- The national importance of *Machair* environments and the *Hebrides Range* are not acknowledged as proposed by the Comhairle.

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- Interchanging references to 'Outer Hebrides' and 'Western Isles' throughout the document provides discrepancy in identifying our islands.
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PROPOSED AREA OF COORDINATED ACTION: Western Seaboard Renewables

This proposal anticipates synergy between the Outer Hebrides Renewable Offer and West Coast Cluster sites. Scotland's Western seaboard is home to one of the richest renewable energy resources in Europe and one of the strongest and most consistent wave regimes on the continent. The National Renewables Infrastructure Plan (N-RIP) positions Arnish, Kishorn and Machrihanish as key locations that can play an important role in supporting the development of a globally competitive offshore renewables industry based in Scotland. Together they form part of a West Coast Cluster and provide locations attractive to the supply chain for offshore renewables infrastructure. Enhancing the infrastructure on the West coast would enable Scotland to capitalise on its unrivalled potential in these technologies and support its aspiration to become a Low Carbon Place. The carbon reduction, security of supply, socio-economic benefit and supply chain opportunities detailed in the Comhairle's formal consultation response provide background to the proposal for the 'Western Seaboard Renewables' AOCA.

The Comhairle welcomes the following 'Positive Outcomes' of the Proposed NPF3:

- A wider appreciation of the challenges and opportunities facing rural areas, particular the distinct sub-sections which recognise the unique context of *coastal and island communities*.
- A new *Digital Fibre Network* National Development which includes link to and within the Outer Hebrides, where the Highlands and Islands are noted as a focus area.
- Updated National Development which focuses on enhancing the *High Voltage Transmission Network* to increase renewable electricity generation.
- A National Long Distance Walking and Cycling Route identified as a new National Development, which includes part of the *Hebridean Way*.
- Stornoway is identified as a *coastal and island hub* and focal point for investment and transport connections, with specific reference to its strategic location, economic potential and role as a service and transport centre. Improved grid connections, digital connectivity and new energy technologies are noted as resources which would help realise the areas potential. Arnish highlighted as part of the Low Carbon/ Renewable North Enterprise Area.
- Stornoway identified as one of five *key ports* in the 'A Connected Place' and its deep water assets identified as presenting significant opportunities for taking advantage of new shipping routes across the Arctic and for tourism development (cruise).
- Specific reference to the importance of: *wave energy* in the Outer Hebrides; the role of *crofting* in supporting natural and cultural environments, *St Kilda* World Heritage Site; *land reform and community ownership* of rural assets; *low carbon fuel* options in the Outer Hebrides; and the need to address the impacts of *climate change and long term resilience* in island and coastal communities.

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- Roll out of next generation broadband to all parts of rural Scotland scheduled within the next 5 years; dualling of A9 programmed for 2025; importance of improvements to A82, and; trunking of the A83 to the rural North West.
- Better reference throughout to the integration of Marine and Terrestrial planning and the further 'key action' of *"...seeing planning authorities anticipating the likely need for new housing, infrastructure and services resulting from offshore renewables investment in coastal and rural areas through a joined up approach to marine and terrestrial planning."*