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NATIONAL PLANNING FRAMEWORK - CONSULTATION PAPER

The Comhairle welcomes the opportunity to comment upon draft National Planning Framework and appreciates your agreement to extend the deadline. The Comhairle considered a paper on the draft document at its meeting on 24 April and these comments are attached.

Once consideration has been taken of all the comments submitted on the consultation, the Comhairle would appreciate a written explanation of how its comments have been taken into account.

Leis gach dùrachd

Diane McPherson
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Sustainable Communities Department

DRAFT NATIONAL PLANNING FRAMEWORK 2

RESPONSE ON BEHALF OF COMHAIRLE NAN EILEAN SIAR

General Comments

- 1 The Comhairle welcomes the opportunity to comment on draft NPF2.
- 2 The draft NPF2 covers many topics and scenarios *such that it could be accused of trying to be all things to all men*. It consists broadly of a Strategy and a set of nine 'national developments'. The inclusion of national developments to deliver the national strategy strengthens the framework. However a number of issues are unclear.
- 3 It is stated in the draft document that the projects Ministers propose to designate as national developments are considered to be essential to the delivery of the spatial strategy set out in the National Planning Framework. However the rationale for the identification of these particular developments is not clearly stated. Furthermore any benefits arising from their development and how they meet the aspirations of the strategy are not clearly set out. NPF2 would benefit from a stronger link being established between the strategy and the national developments. Therefore the document needs to be more focused and concentrate on demonstrating how the national developments will deliver the NPF2 strategy. A Statement of Need is set out for each of the national developments that provides some detail on the each proposal. These could be expanded to address this.
- 4 Each Statement of Need includes a section entitled Matters to be Addressed at Consent Stage. This section identifies issues such as the existence of SPAs, SACs and the need to have regard to the Habitats Directive. Given the scale of the national developments and that inclusion in NPF2 assures agreement of the principle of such developments, it would seem unwise to leave such considerations to the consent stage. It is suggested that some detailed discussion with the relevant agencies, including the European Commission, should be carried out prior to designating them as national developments and including them in the framework.

Comments specific to Outer Hebrides

- 4 The 2004 National Planning Framework recognised the particular challenges facing the Western Isles in terms of economic performance and declining, ageing population as well as the significant contribution the islands could offer to the climate change agenda through the harvesting of renewable energy. Many of these challenges still face the islands while the opportunities they offer also remain.
- 5 While NPF2 acknowledges this, the issues facing the Outer Hebrides arising as a consequence of depopulation could have been more clearly stated in the draft Framework along with suggested strategies to address these issues.
- 6 The submission made by the Comhairle during preparation of NPF2 (Energising the Outer Hebrides) offered solutions that both assisted in addressing the challenges while taking advantage of the opportunities. The proposal set out in the paper is based on two main strands: the identification of the Outer Hebrides and surrounding waters as a 'National Energy Zone' and the specific identification of Stornoway (West Harbour) as an 'Energy Portal'.

- 7 Stornoway West Harbour Energy Portal proposal would encompass the Arnish fabrication facility which lies adjacent. Arnish offers unrivalled opportunities. It is the only facility within Scotland, and indeed the UK, that provides a deep water facility and safe harbour sufficient to allow ships up to 120m in length to berth alongside. This obviates the need to carry and transfer cargo offshore for onward despatch. Furthermore it is the sole wind tower manufacturing facility in the UK at present and in terms of the renewable energy sector has the potential to expand into production of other related components, such as blades. Development of this area is critical to the realisation of Outer Hebrides as an energy exporter. Such a facility is therefore of national importance and this should be explicitly stated in the document.
- 8 NPF2 states that targeted support will continue to be needed in areas such as Caithness and some of the islands, which are still experiencing decline. The Comhairle is of the opinion that the 'Energising the Outer Hebrides' proposals would go some way to meeting these challenges and would be happy to work with the Government to seek to reverse this decline through implementation of these proposals. The various elements that comprise the Energising the Outer Hebrides proposal would not only maximise the benefits to be realised from renewable energy development but also includes the freeing up of land for associated housing and commercial development within Stornoway.
- 9 The Comhairle welcomes the inclusion of 'Grid Reinforcements to Support Renewable Energy Development' particularly 'new subsea cables links for the Outer Hebrides and the Shetland Islands' as this meets the Comhairle's objectives in terms of exporting renewable energy. However it is suggested that rather than creating an 'arc of opportunity' it would better meet the aspirations of the draft NPF2 to consider two separate grid connections, one on each coast. This would be a step towards strengthening the links both to Europe and the Baltic States as well as to Ireland and could also provide a link for the Argyll Islands on the west coast. It is recommended that the indicative maps are amended to show optional routes and mainland connection points for the grid connections.
- 10 It is further recommended that the indicative area of Marine Energy potential shown on Map 19 is extended to cover the whole of the west coast of Outer Hebrides to the Butt of Lewis.
- 11 The Scottish Government wishes to work with key stakeholders including local authorities to identify the tasks required to deliver NPF2. In addition to the grid reinforcements set out in NPF2, the draft NPF2 recognises the Comhairle's ambition for the Stornoway West Harbour development and the benefits it would bring. The Comhairle is disappointed that NPF2 does not go as far as to identify this as a national priority and would wish to discuss implementation of its proposals with Scottish Ministers to realise the benefits that such proposals would bring for the Outer Hebrides and to the broader national agenda.