

Submission by Community Land Scotland on behalf of their community land owning members in the Western Isles to Comhairle nan Eilean Siar on their local development Plan Main Issues Report consultation 2016.

### Introduction

As the Main Issues report alludes to the majority of the Western Isles now being in community ownership, and all community owners in the Islands are members of Community Land Scotland.

Community Land Scotland welcomes the opportunity to make a contribution to the developing thinking within the Main Issues Report and which will inform the development of the Local Development Plan planned for the Islands later this year.

Community Land Scotland understands the very real significance of the Local Development Plan to the future economic success and in preparing the way for the social and environmental well-being of the Islands.

### Discussion of issues

The Main Issues Report consultation document demonstrates a welcome critical analysis of the limitations of existing policy approaches set out within the current Local Development Plan.

Arising from this analysis the proposals in the consultation document represent a welcome move to **additional flexibility** in approach to a number of key fronts. In part the report recognises that the need for greater flexibility arises from proposals emanating from community land owners who are also recognised as significant new players in meeting the development needs of the Islands.

In this latter regard, Community Land Scotland would like to suggest that more explicit recognition is given to the new forces for development represented by community land owners as local agents for social and economic growth by **offering community owners a status as development partners** in the development plan process and into the future development planning and delivery more generally.

Such a strategic approach would offer an ever greater local focus and the capacity for development planning and delivery across the Islands, in suitable and stronger partnership arrangements with the Comhairle.

It is also the case, however, that community owners are at different stages of their development with some being entirely new, and others long established or well into their development. This has a number of implications that support the need for greater flexibility moving forward, for example:

- A number of community owners will have yet to develop their own local development plans but as and when these emerge, they require the flexibility to introduce their proposals to the land use planning and development system.
- Their plans may be for different time horizons than the formal Local Development Plan.

Beyond this, while community owners will have clear aspirations and in an increasing number of cases well developed short and medium term development plans, these will not necessarily be land use plans for the longer term. There are important issues that require to be addressed as to how community owners can be increasingly **skilled-up** to make their full contribution to the land use

planning system, in the most informed way into the Comhairle's land use issues planning, and to prepare the way most effectively for local development.

It is suggested that by working in closer partnership, **the Comhairle can secure a strategic land use benefit through supporting community owners to gain the necessary insights and skills to play an ever fuller role in development planning and place making**, with the Comhairle either directly or indirectly supporting this.

Community Land Scotland will be willing to facilitate discussion between its Island members and the Comhairle in working through how best the local development effort can be enhanced within the coming Development Plan period.

### **Specific issues for consideration or comment**

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The National Planning Framework (NPF 3) highlights Stornoway as a key port for national planning purposes. However, within the Islands, and over time potentially nationally, is this the only port that should be afforded this status? Community Land Scotland would like to see consideration given to other ports in the Islands and their development status and potential within the Local Development Plan and potentially nationally in time.

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Objectives. The objectives highlighted are appropriate. However, there is a dimension that might be usefully added to further exploit the fact of community ownership has a focus on development potential in a way the previous ownership structure simply did not, by having a further objective to a more decentralised focus for development planning and potential through working in formal partnership with community land owners on land use and development issues.

Guiding development to the right places is a stated objective of the plan. This approach is common to development planning and of course has relevance for more strategic proposals in particular. However, it also implies a quite centralised approach at the whole Island's level, as opposed to a complementary and more localised development plan vision that may now be possible through the greater community ownership of land. In other words, the policy proposal as it stands begs the question who will do the 'guiding' of development to appropriate places and whether that can have a more local dimension in addition to the Comhairle's legitimate all Island overview.

Pages 6 and 7

This section of the consultation paper provides a welcome and open analysis of the limitations of current policy, and explains well what the Comhairle's views are on key matters and the preferred way forward, as set out in A. B. C. etc

At E. there is reference to having a marine dimension to overall land use planning and this would appear to be a sensible innovation in line with wider marine planning initiatives and the importance of the marine environment and assets to the Islands. That said, this also raises questions about who the key stakeholders in the processes of marine planning will be regarded to be. The approach needs to be an inclusive one and which takes the interests of the various land based key infrastructure owners and operators fully into account with in any marine components of the plan to be developed.

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The honest analysis here is also welcome, as is the central approach of 'place making' within forward planning. In this regard, community owners need to be seen as the key drivers of 'making their place' and involved in all relevant processes as key development partners.

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The exemption from past restrictions for affordable housing development is very welcome.

General comment

The settlement and re-settlement of land. The extra flexibility of approach to housing is very welcome and while it forms part of 'regeneration' effort within the strategy envisaged by the main issue report consultation, it may be appropriate to go further and **make explicit policies and provision for the settlement or re-settlement of land**. This will to some extent raise questions about and potentially engage the question of the Wild Land map and policies, but this is an issue that ultimately requires to be addressed as at least some of the land included in so called 'wild land' was settled by people within living memory or within clearly recorded history. In short, future planning policies should explicitly provide for the settlement or re-settlement of land as activity to be positively encouraged, in addition to having the more flexible policies toward individual housing proposals.

## Conclusion

There is much to welcome in the main Issues report consultation, in particular the additional flexibility of approach to development in future.

It is further welcomed that there is reference in the report to the change that community ownership is bringing to a more locally based drive for development that was not present before. However, the approach could be strengthened by more explicit recognition of community owners as having some sort of formal status as development partners, and a commitment by the Comhairle to assist owners become ever more effective in the development activity space and in their development planning skills.

Community Land Scotland will be happy to assist facilitate further dialogue about the development of the Local Development Plan with the Comhairle, as appropriate.

Community Land Scotland  
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