



COMHAIRLE NAN EILEAN SIAR

NATIONAL PLANNING IMPROVEMENT FRAMEWORK

Performance Assessment Template

Cohort 3

February 2025



1. Please use this document as a template for the self-assessment. If you can please state which planning authority you are and your lead officer below.

Planning Authority:	Comhairle nan Eilean Siar
Lead officer:	John Cunningham, Chief Planning Officer
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1. Please provide an introduction page, setting out a bit of background to your planning authority and the purpose of the self-assessment and improvement action plan.

Comhairle nan Eilean Siar is the Local Authority for the Outer Hebrides (Western Isles) of Scotland and the only Local Authority in Scotland to have a Gaelic-only name. Prior to Local Government reorganisation in 1975, the Outer Hebrides were governed by Ross & Cromarty Council (Lewis) and Inverness-shire (Harris, North Uist, Benbecula, South Uist, Barra and associated islands). In 1975, Western Isles Islands Council was formed as a Unitary Local Authority, renamed Western Isles Council in 1996 and Comhairle nan Eilean Siar in 1998.

Comhairle nan Eilean Siar is an independent Council comprising 29 Elected Members covering 11 multi-Member Electoral Wards and governs a 130 mile long archipelago which is home to a population of around 26,000. There are 15 inhabited islands and more than 50 substantial non-inhabited islands. Around 7,000 of the population live in the main town of Stornoway and its environs.

Traditional industries are Crofting, Fishing and Harris Tweed and there is a strong, though highly seasonal, visitor economy. The islands are rich in archaeology and built heritage and are renowned for their scenery and rich natural heritage. There is a private sector run former military Test and Evaluation presence in Benbecula and South Uist and Aquaculture is a major employer across all islands. Renewable Energy is viewed as the next socioeconomic opportunity with three Onshore Wind Farms consented, two Offshore Wind Farms in development and work underway on an emerging Green Hydrogen economy. Provision of a 1.8GW Transmission Link, currently in procurement / early development, will connect all Onshore and Offshore Wind to National Grid in 2030.

The public sector provides a significant proportion of employment. Comhairle nan Eilean Siar is the Planning Authority for the Outer Hebrides and employs two small teams – Development Management and Development Planning – with staff located in Stornoway and Balivanich (Benbecula). The service is led by the Chief Planning Officer. The Development Management Team comprises a Planning Manager, five Planning Officers (currently 4.6 FTEs) and a small

business support Group. The Development Planning Team comprises a Planning Manager, three Planning Officers (currently 2.6 FTEs) and a Research / Technical capability.

The Development Management Team enjoys a good measure of delegation in determining applications for Planning Permission with only national/major or sensitive applications reported to the Comhairle's Planning Applications Board for determination.

The Development Planning Team is currently in the Evidence Gathering stage of a new Development Plan and there are longer term aspirations for the acquisition of Marine Planning powers.

- Please use the below matrix when determining what score you are giving each attribute. We ask that if you score a 1 or 2 that you provide a good practice example, a separate template for this will be provided.

 PRIORITISE	 REVIEW	 DEVELOP	 BUILD UPON	 CONSOLIDATE
No progress	Making limited progress	Making fair progress	Making good progress	Making excellent progress
5	4	3	2	1
Prioritise fundamental review and revisit approach taken. Engage with NPI Learn from others	Review ambition Review approach taken Inform NPI Learn from others	Increase ambition in targets Review and improve implementation	Increase ambition in targets Share learning with others	Share learning with others



A high performing planning authority needs to have the right number of people to do the work expected of it with the rights skills set. It also needs to have a strategy to ensure that it retains and recruits the right staff in the future. It supports staff to upskill and to be prepared for changes in policy, legislation, and new circumstances.

ATTRIBUTE 1: THIS PLANNING AUTHORITY HAS SUFFICIENT RESOURCES AND SKILLS TO MAXIMISE PRODUCTIVITY

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have the sufficient level of staff to carry out all activities within the required timeframes?
- Does the planning authority have the ability to carry out all activities within the required timeframes with its current budget?
- Does the planning authority have the ability to carry out all activities within the required timeframes with its current income?
- Does the planning authority received responses from consultees within the prescribed timescale when assessing planning applications?
- Does the planning authority have the ability to access the appropriate advice, expertise, evidence and data it requires?

Narrative

For the Planning Service of Comhairle nan Eilean Siar, 2023 / 24 was defined by a catastrophic Ransomware attack on Comhairle servers (master and back-up) which took place on 7 November 2023. Across the Comhairle, all data and documents held on these servers became inaccessible.

In terms of **Development Planning**, File folders and mapping data up to November 2018 were recovered thanks to the diligence of Planning staff but later Development Planning folders etc, remain irrecoverable. This has significantly hampered progression of the new Outer Hebrides Local Development Plan.

In terms of **Development Management**, the servers hosting the Case Management System (Uniform) including constraints mapping (Unimap Web), the Document Management System

(Idox), the Public Access for Planning portal and all import / export connectors were impacted by the cyber attack and could not be recovered. The Development Management team had to create an interim bespoke system to maintain delivery of the Development Management function until a more formal recovery strategy was agreed and this took up an inordinate amount of staff time.

A 'Systems Re-build' Project commenced in Summer 2024 which included the procurement of new servers and other hardware and the installation, by suppliers, of all lost applications and the subsequent set up, configuration testing and re-population of these systems.

The Systems Rebuild project has proven to be onerous over the remainder of 2023 / 24 and still continues in 2025. Key staff are still being diverted away from core Planning duties with an inevitable impact on service performance.

The Ransomware attack therefore continues to severely impact delivery of all Planning functions.

Does the planning authority have the sufficient level of staff to carry out all activities within the required timeframes?

The current staff complement, particularly in Development Management, is dangerously inadequate for the approaching Renewable Energy challenge. Due to successive rounds of efficiency savings, the **Development Management** Team struggles to deliver on day to day workload. This has come about through loss to the Team of an Enforcement Officer post, loss to the Comhairle of a Biodiversity Officer post and contraction of the Comhairle's Roads and Archaeology services. The whole situation was exacerbated by a catastrophic Ransomware attack in November 2023 (details above) which resulted in loss of the Planning Service's entire data management system. Over a year later, systems are still being rebuilt and a significant level of Development Management resource is having to go into re-population of the system with historic data.

Unfunded new and additional requirements of the 2019 Planning (Scotland) Act are also impacting on the **Development Planning** Team as they progress the early stages of the new Development Plan. The Evidence Report stage of the new Plan is particularly onerous on a very small Development Planning team where the expectation is still to deliver an Evidence Report similar to that of a much larger Planning Authority. The situation is further exacerbated by the loss of all Development Plan monitoring files, all baseline and socio-economic data, contact database etc in the Ransomware incident.

This Performance Assessment relates to Financial Year 2023 / 2024 and the real upsurge in Renewable Energy developments did not begin until during the second half of 2024. These

Renewable Energy developments may, therefore, be viewed to be 'out of scope' for this Assessment but the growing cloud of approaching workload inevitably impacted on the under-resourced service during 2023 / 2024 as considerable time and resource had to be committed to campaigning for an additional Major Project resource in anticipation of a rapid increase in Renewable Energy applications. Although Scoping for a 1.8GW HVDC Converter Station and a 900MW Offshore Wind Farm were received during the second half of 2024 - and will be followed shortly by scoping for a 450MW Offshore Wind Farm and three Onshore Substations plus consent applications for a 1.8GW HVDC Converter Station and 900MW Offshore Wind Farm – the Development Management Team was already involved, during 2023 / 2024 in the re-consenting of two major Onshore Wind Farms and extensive upgrade of Transmission and Distribution infrastructure.

Does the planning authority have the ability to carry out all activities within the required timeframes with its current budget?

No. The Planning Services struggled to meet its requirements during 2023 / 2024 due to erosion of the staff complement, particularly in Development Management, over recent years. During the year under consideration, a number of Onshore Wind Farms went through re-consenting and some extensive Transmission and Distribution upgrades were consented. Now, with £6.2bn worth of private Renewable Energy contracts to be delivered in the Outer Hebrides between 2025 and 2030, the service is dangerously under-resourced.

Does the planning authority have the ability to carry out all activities within the required timeframes with its current income?

During 2023 / 2024 the situation was manageable with staff resource funded through regular application fees and some fee income from Onshore Wind re-consenting / electricity distribution infrastructure consenting. However, demands on the Planning Service are set to grow exponentially during 2024 / 2025 when a £6.2bn programme of Renewable Energy investment - planned for delivery within a four year window - requires to be scoped and assessed for consenting.

Farmed Salmon is the UK's largest food export and 20% of it is farmed in the Outer Hebrides. This huge industry is currently undergoing major restructuring involving adoption of new technology to improve its environmental performance and production output. This sector also has plans for a significant number of projects in the Outer Hebrides which will require considerable input of

resource from the Planning Service over the next five years. While substantial fees will be received for major and large scale local applications for developments in the Renewable Energy and Aquaculture sectors, these fees are one-off and will not sustain posts in the long term.

Comhairle nan Eilean Siar does not currently charge for Pre-Application Advice or other discretionary fees as the throughflow of Major or National projects is not sufficiently consistent to provide a meaningful level of income. Also, the management, staffing and administrative capacity to undertake a Cost / Benefit exercise for the Planning Authority area and subsequently to set up, resource and administer discretionary charging has not been available.

The Planning Teams therefore rely entirely on application fee income. As the Planning Service has sought to prepare itself for the coming Renewable Energy workload, the Comhairle has agreed to the allocation of Crown Estate Scotland revenues to the Planning Service and this, with the addition of some Major Projects fees rolled over a number of years, will support the appointment of one Major Projects Planning Officer over a fixed period.

Although out of scope for this assessment, discussions with a partner Planning Authority, facilitated by the new Planning Hub, are showing promise for more effective resourcing from 2024 / 2025 onwards.

Does the planning authority receive responses from consultees within the prescribed timescale when assessing planning applications?

No. Response times from consultees are increasingly beyond timescale. This has likely arisen due to a corresponding contraction of workforce across our consultees and workload re-prioritisation towards larger scale projects reflecting an increase in the volume and complexity of these applications. This has been at the expense of guidance on local scale developments, many of which can be complex, where specific consultation advice has been replaced by generic standing guidance. This has moved the burden of assessment to the Planning Authority which no longer has any in-house specialist advisers, as noted above.

A discussion with the Scottish Government's Chief Planner has revealed that the new Planning Hub may be intending to recruit sectoral experts who will focus on providing expert consultation responses to Planning Authorities within the prescribed timescale. This is a welcome development and, if implemented in full, should speed up Planning Permission determination times while ensuring a level of technical assessment that will stand scrutiny under appeal, at Public Inquiry or under Judicial Review.

The timely return of technically competent consultation responses is important for timeous determination of applications. This applies generally but is very important for larger, more complex development applications where the Comhairle as Planning Authority is the Statutory Consultee. This includes applications for Major and National scale development in Renewable Energy consented by Scottish Ministers through Section 36 and 37 of the Electricity Act and the increasingly larger scale Fish Farms coming forward in Hebridean waters.

These larger development proposals can be highly controversial and resulting consents run a higher risk of scrutiny through Public Inquiry or challenge through Judicial Review. The provision of timeous, technically competent consultation responses will be an important factor in ensuring the robustness of decision taking by the Planning Authority and the reputation of the Planning system in the eyes of the public.

Does the planning authority have the ability to access the appropriate advice, expertise, evidence and data it requires?

No. Sources of advice and expertise internal to the Comhairle have eroded over the years due to efficiency savings. There is now no source of Biodiversity and Access advice in-house and the capacity of Archaeology, Roads and Environmental Health services to respond within timescale is increasingly constrained. Further, the restructuring of services under a small number of Chief Officers can compromise the ability of individual services to provide impartial consultation advice. With the Planning Team now sitting alongside the Economic Development Team in a wider Economic Development and Building Services functional area, colleagues providing Socioeconomic advice on projects may be compromised when they are otherwise actively promoting these projects for their socioeconomic benefits.

External consultation on Flooding, Natural Heritage, Built Heritage, Water and Drainage etc continues as it always has done but it is increasingly difficult to secure substantive, robust, case-specific responses to consultation requests within prescribed timelines. The Comhairle may shortly be looking to the new Planning Hub to deliver some consultation responses directly or to support the out-sourcing of consultation requests to partner Planning Authorities or private consultancy to ensure that consultation deadlines are met.

ATTRIBUTE 2: THE PLANNING AUTHORITY HAS A VALUED AND SUPPORTED WORKFORCE

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have a workforce planning strategy in place?
- Does the planning authority have the ability to support staff development and upskilling and send staff on relevant courses?
- Does the planning authority have a deliverable commitment to support staff health and wellbeing?

Narrative

Does the planning authority have a workforce planning strategy in place?

Yes, the Local Authority has a corporate Workforce Planning Strategy in place and this is populated by individual Service Workforce Plans. The Comhairle's Corporate Workforce Panel, and ultimately its Human Resources Sub-Committee, have oversight of the Workforce Planning Strategy. However, the efficacy of this strategy for the Planning service is not apparent as yet.

Does the planning authority have the ability to support staff development and upskilling and send staff on relevant courses?

All Planning staff are encouraged to participate in CPD opportunities and Managers circulate details of these opportunities as they arise. Due to the cost of travel to the mainland, and the cost of accommodation while on the mainland, against a background of sustained savings, it is seldom possible to fund attendance at mainland in-person courses. The preference is always for online courses, delivered through MS Teams or Zoom.

Occasionally in the past, the Planning Service has developed staff through the Career Grade process where a first degree graduate might join the team and then be financially supported through a Distance Learning Planning qualification. Going forward, the service is interested in replicating PARD's 'Future Planners' degree apprenticeship programme and to better understand affordable and accessible distance learning opportunities that will allow graduates to study and qualify as competent planning professionals.

Does the planning authority have a deliverable commitment to support staff health and wellbeing?

The Comhairle has an Occupational Health service which provides support to employees and a referral system to Occupational Health Physicians if required. The Occupational Health service

develops health promotion publications to support health and wellbeing and the Employee Health & Wellbeing Strategy supports this area of work.

In 2020, the Comhairle introduced the Employee Self-Appraisal Form to give employees the opportunity to reflect on progress, review objectives and identify development and wellbeing needs throughout the year. Open discussion and collaboration relating to health and wellbeing is encouraged and, where relevant, employees can complete a Wellness Action Plan (WAP), which is a tool that helps employees manage their mental health and wellbeing at work.

The Comhairle introduced the Employee Assistance Programme (EAP) in 2019 to strengthen its wellbeing provision for employee. The EAP aims to promote good mental health and wellbeing and to reduce absences related to depression, stress and anxiety. The service is provided by Health Assured and is a free 24 hour and confidential service, available to employees and immediate family members to help deal with personal and professional problems that could be affecting home life and work life, including the impact of cost of living pressures on health and general wellbeing.

The Comhairle's Organisational Development Strategy 2023 – 2030 includes a Work Well Action Plan which tracks a number of SMART wellbeing, personal resilience and health promotion objectives.

Attribute	Score (1=Making excellent progress, 5= No progress)
1. The planning authority has sufficient resources and skills to maximise productivity	4
2. The planning authority has a valued and supported workforce	3

Based on the grading above, outline any areas of improvement that are required and by whom and their level of importance (High/ Medium/ Low) and by when (short/ medium/ long term).

Improvement Action What action will you take? What will the outcome be?	Owner	Importance High Medium Low	Timescale Short term – 1 year Medium term – 3 years Long term – 3+ years	Resources
ATTRIBUTE 1: In view of the approaching Renewable Energy Major Projects challenge, work with the Planning Hub and	Chief Planning Officer	High	Short Term	Internal, Scottish Government and Developer Contribution

a peer Local Authority to ensure that sufficient Planning resource is in place through secondment, outsourcing etc				
	Planning Managers	Medium	Medium Term	Leadership Team Time



A high performing planning authority has a positive culture through ensuring it has sound governance, effective leadership and a commitment to continuous improvement. The authority has an identified chief planner, who is supported by a strong leadership group to advise on decision-making, policy and operational management.

ATTRIBUTE 3: THIS PLANNING AUTHORITY HAS EMBEDDED CONTINUOUS IMPROVEMENT.

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Has the planning authority undertaken an annual assessment of its performance and acted upon areas previously identified as in need of improvement?
- Has the planning authority achieved recognition at relevant awards or through performance accreditation frameworks?
- Has the planning authority engaged in peer review, good practice exchange or improvement activities?
- Has the planning authority addressed any complaints upheld by the Scottish Public Services Ombudsman and have evidence of this and that it has learned from valid cases?

Narrative

Has the planning authority undertaken an annual assessment of its performance and acted upon areas previously identified as in need of improvement?

Prior to the Ransomware incident of November 2023, the Planning Service monitored performance through the Uniform casework system, submitting performance data to the Scottish Government as required. However, access to the Uniform casework system and the data held was lost through the Ransomware incident. In response, alternative manual systems for the recording of data and the processing of applications were developed to maintain a functioning Planning (Development Management) service. The compilation of performance data from these temporary systems would have been an onerous, additional, task at a time when all available resource had to be wholly deployed in simply maintaining a functioning Planning system. The IT systems were rebuilt during 2024 and work is still ongoing to repopulate the casework system with case data generated over the last 17 months. The Ransomware incident had an adverse impact on both Planning performance and the ability to readily generate performance data. This

data can be extracted retrospectively once the casework system is fully functioning and the input of 2023 / 2024 and 2024 / 2025 case data completed.

In view of these challenges, a temporary exemption from reporting had to be sought from PARD and this remains in place as data systems are rebuilt.

In the wider context, the new National Planning Improvement Framework is welcomed as a system for thoughtful, considered and peer-reviewed self-assessment and the arising Performance Action Plan will form the basis for service improvement going forward.

Has the planning authority achieved recognition at relevant awards or through performance accreditation frameworks?

The Goathill Housing and Care Home Project in Stornoway was awarded the prestigious Housing and Regeneration Award from Scotland's Regeneration Forum (SURF) in December 2023. The Comhairle's Planning Service worked closely with Comhairle Partnership Services, Hebridean Housing Partnership and Scottish Government: More Homes to deliver a planned, mixed-use neighbourhood comprising 74 affordable homes, the 52 bed Taigh Shìphoirt Care Home and 50 homes-with-extra-care. SURF judges stated, *"We were impressed by the ambition of the project and the overall enthusiasm, collaboration and partnership approach to service delivery shone through at every level"*.

Has the planning authority engaged in peer review, good practice exchange or improvement activities?

Along with other services, Planning is subject to corporate benchmarking through the Local Government Benchmarking Framework. Beyond this, other work is happening informally and reactively. For example as Planning Authorities have come through the DPEA Gatecheck process for the Evidence Report stage of the new Local Development Plans, the Development Planning team have been reviewing Gatecheck outcomes, identifying good practice and learning outcomes.

Through the North of Scotland Development Planning Forum, which meets periodically, the Comhairle exchanges good practice and problems / solutions with other Development Planning teams. Whilst the Forum has only met in person once during the assessment year, the group exchanges email correspondence.

The Planning Service, through its Chief Planning Officer and Planning Managers (Development Management and Development Planning), is heavily involved with Heads of Planning (Scotland), benefitting from, and offering, good practice particularly around the areas of Aquaculture and Renewable Energy infrastructure development where the Comhairle has built considerable expertise.

Has the planning authority addressed any complaints upheld by the Scottish Public Services Ombudsman and have evidence of this and that it has learned from valid cases?

The decision making process is robust and well informed. The Comhairle has had no complaints upheld against it on Planning matters for many years now.

ATTRIBUTE 4: THE PLANNING AUTHORITY HAS SOUND GOVERNANCE

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have an effective scheme of delegation in place?
- Have all councillors who exercise a planning function undergone statutory training and is there is evidence of ongoing training for members?
- Have more than x % of officer recommendations have been overturned by councillors at committee or Local Review Body.

Narrative

Does the planning authority have an effective scheme of delegation in place?

Yes. The Comhairle has a Scheme of Delegation which was updated in October 2024 to reflect the latest corporate re-structuring. The Planning Service enjoys fairly wide delegated powers.

For Development Planning, delegation is granted *“to have in place such operating policies and procedures as are required to support the administration of the Conservation Area Grant Scheme, Stornoway Town Centre Painting Scheme and Thatched Building Grant – and to determine all applications to each Scheme”*.

For Development Management, delegation is granted to determine a range of applications, procedures and responses to consultation. With regard to applications for Planning Permission, delegation is as follows:

The Appointed Officer of the Council is the Officer appointed in terms of Section 17 of the Planning etc (Scotland) Act 2006 and is authorised to determine applications for planning permission specified below:

- any planning application being an application, which meets the definition of a “local development”, as specified in the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009; and
- all applications for consent, agreement or approval required by a condition imposed on a grant of planning permission for a development within the category of "local" development.

Exemptions:

The delegation shall not include applications made by an application from staff in direct employment within the Comhairle's Planning Service.

This delegated authority shall not include applications meeting the definition of National Development listed in the National Planning Framework or a major development listed in the schedule to the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009.

The Appointed Officer shall not determine an application (except where the determination is a refusal on the grounds that there is lack of information):

- to which six or more representations, which are considered by the Appointed Officer to be valid and raising material planning considerations; or
- where it is proposed to approve the application and that the application is significantly contrary to the Development Plan; or
- where it is proposed to approve the application and there is a formal objection from a statutory consultee that would trigger referral of the application to Scottish Ministers; or
- where a concurrent Listed Building Consent application is to be refused for the same proposal; or
- for the removal or amendment of conditions which were originally imposed at the specific request of Members; or
- which had been determined subject to a planning agreement (planning obligation) and which now require to be determined as a consequence of the Comhairle and the applicant and other parties to the agreement not being able to conclude the agreement within a reasonable period of time. This provision will apply in cases where the original decision was taken by Members.

Notwithstanding all of the above, in such cases where the development is considered by the Appointed Officer to be sensitive or contentious, the Appointed Officer is authorised not to determine the application and will refer the application to the relevant Committee of the Comhairle for a decision.

Development Planning and associated strategic planning matters (eg resourcing, service overviews, responses to Scottish Government consultations etc) report to the Sustainable Development Committee which also considers the Comhairle's wider Economic Development and Housing agenda. This provides a good strategic fit for forward planning and development delivery.

Following the election of a new Council in May 2017 and the reorganisation of Services Committees, a dedicated Planning Applications Board was established to remove reporting of Development Management decision making from the Environmental Services Committee. The benefits of this have been many, allowing Planning Applications Board members to convene as a Planning Authority, distinct from their other many roles, and to dedicate more Committee time to Planning decision making while reducing the likelihood of conflict of interest. It has also

allowed trained Board Members to better focus discussion on relevant Planning matters when considering applications. Members of the Planning Applications Board are offered regular Planning training. Planning Application Board meetings are open to the public and are routinely live streamed.

Have all councillors who exercise a planning function undergone statutory training and is there evidence of ongoing training for members?

Yes, members of the Planning Applications Board have undergone two training sessions during the current Comhairle term, typically an all-day workshop provided by Development Planning, Development Management and Legal Services staff. Although designed for Planning Application Board members, these workshops are open to all Elected Members as determinations for National or Major applications are handled by Full Council. Training covers Development Management, Development Planning, the new Local Development Plan process and legal consequentials.

In addition, a specific briefing event over 3 hours was held to introduce the new National Planning Framework 4 to Elected Members with subsequent events on Climate Change and Carbon delivered with the support of Planning staff.

Have more than x % of officer recommendations have been overturned by councillors at committee or Local Review Body.

Over the year under review, no officer recommendations were overturned by Members and the Local Review Body has not had to meet.

ATTRIBUTE 5: THE PLANNING AUTHORITY HAS EFFECTIVE LEADERSHIP

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have an identified Chief Planning Officer in place?
- Does the Chief Planning Officer advise on corporate decision making and policy within the broader organisation?
- Is the planning authority's Chief Planning Officer a member of the Royal Town Planning Institute?
- Does the Chief Planning Officer advise and support external bodies through engagement in organisations' committees, advisory groups or working groups?
- Does the planning authority have a strong leadership team that supports a culture of continuous improvement?

Narrative

Does the planning authority have an identified Chief Planning Officer in place?

From 2017 to 2024, the Planning Service was led by an Economic Development Head of Service and not by a qualified Planner. A Chief Planning Officer (RTPI member) was appointed in July 2024. The Chief Planning Officer retains a Strategic Renewable Energy role and arrangements have had to be put in place to avoid conflict of interest with the consenting process for Renewable Energy projects.

Does the Chief Planning Officer advise on corporate decision making and policy within the broader organisation?

Yes, the Chief Planning Officer is a member of Corporate Management Team which meets fortnightly as a corporate decision making and policy formulating forum. Advice on Planning and place issues is routinely provided to Corporate Management Team. The Chief Planning Officer also meets monthly with the Comhairle's Chief Executive for horizon scanning and to overview policy and implementation insofar as it relates to Planning and place. The relevant Committee Chair and Vice Chair might benefit from similar monthly briefings.

Is the planning authority's Chief Planning Officer a member of the Royal Town Planning Institute?

Yes.

Does the Chief Planning Officer advise and support external bodies through engagement in organisations’ committees, advisory groups or working groups?

Nationally, the Chief Planning Officer sits on Scottish Government Advisory Groups on Economic Strategy, Marine Planning, Community Benefit from renewables, Crown Estate Scotland operations and Affordable Housing. The Chief Planning Officer is also active within Heads of Planning Scotland (HoPS), contributing to the work of the Energy Sub-Group and responding to various consultations. From time to time, the Chief Planning Officer will represent the Comhairle in giving evidence on relevant matters to UK and Scottish Parliament Select Committees.

Locally, the Chief Planning Officer sits on the Management Committee of the local Housing Association and often attends Community Council meetings to advise on Planning and place. The Chief Planning Officer also chairs the Strategic Local Development Programme group for Housing, engaging with the Registered Social Landlord, the local Housing Association and Scottish Government: More Homes Division.

Does the planning authority have a strong leadership team that supports a culture of continuous improvement?

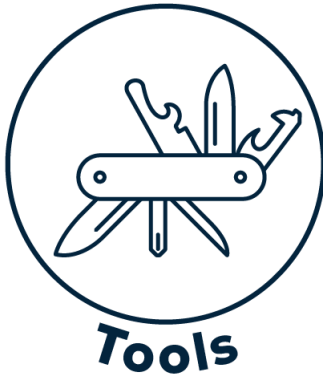
A Corporate Strategy is in place for the Comhairle and this cascades down to individual Service Plans for each service area. Planning sits within the Chief Executive’s service area alongside Building Standards, Housing, Economic & Community Regeneration and Gaelic Language, Heritage & Culture. Within a rigorous Service Plan reporting regime, the Planning service reports against key performance indicators and is responsible for Business Plan actions around Local Development Plan and Supplementary Guidance development and Regional Marine Planning progress.

The Comhairle’s Corporate Management Team is currently pursuing a Transformation Plan to be delivered across three themes: Digital Innovation; Driving Performance; and, Future Proofing. The Chief Planning Officer will be contributing to this process through direct engagement with the Corporate Management Team.

Attribute	Score (1=Making excellent progress, 5= No progress)
3. This Planning Authority has embedded continuous improvement	3
4. This Planning Authority has sound governance	2
5. This Planning Authority has effective leadership	2

Based on the grading above, outline any areas of improvement that are required and by whom and their level of importance (High/ Medium/ Low) and by when (short/ medium/ long term).

Improvement Action What action will you take? What will the outcome be?	Owner	Importance High Medium Low	Timescale Short term – 1 year Medium term – 3 years Long term – 3+ years	Resources
ATTRIBUTE 3: Raise awareness of NPIF outcomes and actions across the Comhairle and embed NPIF-led improvement culture within the Planning Service	Chief Planning Officer	Medium	Medium Term	Chief Planning Officer Time
ATTRIBUTE 4: Offer Planning training to all Elected Members given their decision making role at Full Council	Planning Managers	Medium	Medium Term	Leadership Team Time
ATTRIBUTE 5: Introduce monthly Chief Planning Officer briefings for Sustainable Development Committee Chair and Vice Chair	Chief Planning Officer	High	Short Term	Chief Officer Time



A high performing planning authority needs to have an effective local development plan and other strategies in place to provide a vision for the future of the area. It needs to be able to set and deliver on policy ambitions and priorities by clearly informing decision making and providing certainty and predictability for communities, developers and investment. The authority's development management systems need to be effective in making the right decisions about development and be efficient as possible in doing this. The planning authority makes best use of digital technology and how it manages and uses data.

ATTRIBUTE 6: THE PLANNING AUTHORITY HAS A ROBUST POLICY AND EVIDENCE BASE

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have an up to date Local Development Plan in place and/ or is on track to adoption?
- Does the planning authority have an up to date Regional Spatial Strategy in place/ or on track to adoption?
- Has the planning authority's Local Development Plan Evidence Report been approved by the Department of Planning and Environmental Appeals and/ or on track for approval?
- Have the application of the Local Development Plan's policies been found to be deficient at appeal or judicial review?

Narrative

Does the planning authority have an up to date Local Development Plan in place and/ or is on track to adoption?

The current Outer Hebrides Local Development Plan was adopted by the Comhairle on 19 November 2018. Work was well underway on its replacement when the Comhairle was hit by a catastrophic Ransomware attack in November 2023. Loss of data and a complete loss of access to data management systems effectively stopped work on the new Local Development Plan for a considerable period of time as staff effort was diverted into the recovery of data and systems. Work has now restarted and the new Outer Hebrides Local Development Plan is at Evidence Gathering stage with presentation of the Evidence Report to the Comhairle scheduled for later in 2025. The process will then move to Gate Check and full Plan Preparation.

Does the planning authority have an up to date Regional Spatial Strategy in place/ or on track to adoption?

As part of the preparatory work for the National Planning Framework (NPF), the Development Planning team prepared an Indicative Regional Spatial Strategy (iRSS), which informed the National Spatial Strategy and National Developments in NPF. This IRSS will be revisited as part of the new Outer Hebrides Local Development Plan.

Has the planning authority's Local Development Plan Evidence Report been approved by the Department of Planning and Environmental Appeals and / or on track for approval?

No. Delays caused by the November 2023 Ransomware attack on Comhairle servers effectively stopped Local Development Plan preparation for a considerable period of time. Following partial reinstatement of data management systems, Evidence Gathering has now re-started and the Evidence Report is scheduled for presentation to the Comhairle later in 2025, with submission to the Department of Planning and Environmental Appeals subsequently.

Have the application of the Local Development Plan's policies been found to be deficient at appeal or judicial review?

No.

ATTRIBUTE 7: THE PLANNING AUTHORITY MAKES BEST USE OF DATA AND DIGITAL TECHNOLOGY

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Has the planning authority encouraged and promoted planning applications to be submitted through the e-development portal?
- Does the planning authority have a data governance strategy in place for the management of planning data?
- Does the planning authority have the ability to use interactive web-mapping, GIS and spatial data?
- Does the planning authority have the ability to use digital approaches to engagement, including website, social media and other platforms?

Narrative

Has the planning authority encouraged and promoted planning applications to be submitted through the e-development portal?

Yes, The submission of Planning applications through the Scottish Government E-development Platform is promoted via the Comhairle website.

Fortunately, this national Platform is independent of the Comhairle servers which were impacted by the Ransomware incident. Despite the Ransomware incident, developers and agents were able to continue submitting application through the E-development Platform with the only change being the new internal procedures required to effect manual download of all submitted documents.

Does the planning authority have a data governance strategy in place for the management of planning data?

There is a generic Data Governance Strategy in place for the Comhairle which the Planning Service complies with but the Strategy, and its constrained supporting digital infrastructure (eg lack of dedicated mapping server), is not well suited to the requirements of the Planning Service. Requests to refine this Data Governance Strategy to make it more helpful for Planning have not been actioned by the corporate centre. Lack of oversight of Data Governance remains a real risk for the Authority.

Does the planning authority have the ability to use interactive web-mapping, GIS and spatial data?

The Planning Service employs a GIS Planning Technician. With an absence of GIS resource elsewhere in the Comhairle, the GIS Planning Technician is sometimes regarded as a corporate resource and can be drawn into time-consuming corporate tasks with no benefit for the Planning Service. This risk is currently being monitored and managed. The Comhairle does not have a standalone GIS system but uses a version of Precisely's desktop MapInfo system for mapping application data. The GIS Planning Technician maintains all spatial data relating to the Local Development Plan.

The GIS Planning Technician has a strong background in development data and has identified opportunities to widen the use of GIS going forward. At present, these opportunities are constrained by the consequences of the Ransomware incident but, as systems recover, the use of GIS in Planning and other building services will expand.

Does the planning authority have the ability to use digital approaches to engagement, including website, social media and other platforms?

Prior to the Ransomware incident of November 2023, the Planning Service used the Comhairle's website to share information with industry and the community. The cyber incident disabled the website and a temporary, limited website was launched within days, running until launch of a new Comhairle website early in 2025. Staff time is now being taken up in populating the new website with corporate and strategy information, service information and performance data. This is an ongoing task and it will take time to develop the new website with all the information that we would like to have available for the public.

The service routinely uses the Comhairle's social media pages to publicise ongoing work, advertise events and, generally, engage with the community.

ATTRIBUTE 8: THE PLANNING AUTHORITY HAS EFFECTIVE AND EFFICIENT DECISION MAKING PROCESSES

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority planning have the ability to make decisions on planning applications within the required timeframes?
- Are less than x% of planning decisions overturned at appeal or judicial review?
- Does the planning authority have an up to date Enforcement Charter in place?
- Does the planning authority have the ability to resolve enforcement cases?

Narrative

Does the planning authority planning have the ability to make decisions on planning applications within the required timeframes?

Yes. Historically, performance of the Comhairle's Planning Service had been good but the Ransomware incident severely impacted performance on account of the loss of the Uniform case management system, its data and templates, the Idox document management system (where all application documents were held) and the Public Access for Planning portal which allowed the public and consultation bodies to view information on an applications and related documents and plans.

This necessitated the development of a new temporary system using Sharepoint, MS Teams and the interim website of the Comhairle and the creation of new template documents and new processes across the team. Most of these documents and processes required considerably greater work due to the lack of automation normally afforded by the disabled regular systems.

There was a period of five weeks in November and early December 2023 where new applications could not be processed beyond receipt but, during this period, it was still possible to determine existing open cases.

It will take a period of time, post-rebuild of the Uniform / Idox / Public Access systems, to repopulate the data held on interim systems and to create new Uniform Document templates and therefore the Ransomware incident will continue to impact on performance well into 2025 / 2026.

Furthermore, as the Outer Hebrides move into a phase of intense Renewable Energy development (£6.2bn of private project value investment between 2025 and 2030), maintaining performance with existing resources will be very challenging, if not impossible.

The Comhairle's Planning Service is significantly under-resourced in comparison to many other Local Authorities:

DEVELOPMENT MANAGEMENT (Manager and 4.6 FTE Planning Officers)

Planning Manager (FTE)

5 x Planning Officers (4.6 FTE)

DEVELOPMENT PLANNING (Manager and 2.4 FTE Planning Officers)

Planning Manager (FTE)

Planning Officer (FTE)

Planning Officer (0.8 FTE)

Planning Officer (0.6 FTE)

GIS Planning Technician (FTE)

PLANNING ADMINISTRATION (4.8 FTE)

Six posts in a variety of support roles

Due to the effects of the Ransomware incident, performance data on decision making timescales is not currently available.

Are less than x% of planning decisions overturned at appeal or judicial review?

No Planning decisions have been overturned at Appeal or Judicial Review for many years.

Does the planning authority have an up to date Enforcement Charter in place?

Yes, the Planning Service's Enforcement Charter was reviewed in February 2024.

Does the planning authority have the ability to resolve enforcement cases?

The Development Management Team's capacity to deal with enforcement matters is severely curtailed. The post of dedicated Enforcement Officer was lost a number of years ago due to the need for corporate savings. This has led to the Enforcement burden falling on the Development Management Planning Manager and Planning Case Officers.

The current position is not sustainable and there is clearly no internal funding source for the recruitment of a new Enforcement Officer. However, Renewable Energy developers who are now seeking consent for multiple major projects seem willing to collectively contribute the entire cost of a post-consent Conditions Discharge Officer over a three or five year contract. This post could be designed with a compliance / enforcement element and could partly compensate for the loss of the dedicated Enforcement Officer post.

Attribute	Score (1=Making excellent progress, 5= No progress)
6. The planning authority has a robust policy and evidence base	3
7. The planning authority makes best use of data and digital technology	3
8. The planning authority has effective and efficient decision-making processes	3

Based on the grading above, outline any areas of improvement that are required and by whom and their level of importance (High/ Medium/ Low) and by when (short/ medium/ long term).

Improvement Action What action will you take? What will the outcome be?	Owner	Importance High Medium Low	Timescale Short term – 1 year Medium term – 3 years Long term – 3+ years	Resources
ATTRIBUTE 6: Monitor impact of NPF4 on island communities and identify areas for 'island proofing' and refinement for action by Scottish Government	Leadership Team	Medium	Medium Term	Leadership Team Time
ATTRIBUTE 7: Develop the use of GIS in spatial analysis	Planning Manager: Development Planning	Medium	Medium Term	Planning Manager / GIS Technician Time
ATTRIBUTE 8: Review the Committee reporting process to reduce report length and rationalise the number of conditions attached	Planning Managers	High	Short Term	Planning Manager Time

ATTRIBUTE 8: Explore the potential for Major Projects developers to jointly fund a post-consent Conditions Discharge / Enforcement post	Chief Planning Officer	High	Short Term	Developer Resources
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A high performing planning authority should ensure a wide range of people are involved in shaping their future places. Engagement should be fair and inclusive, early, collaborative, meaningful and proportionate and should include difficult to reach groups. The authority should engage with a wide range of partners at a national, regional and local level to ensure a joined-up approach and that links are made across policies and programmes. The planning authority should demonstrate good customer care, transparency and effective communication.

ATTRIBUTE 9: THE PLANNING AUTHORITY HAS GOOD CUSTOMER CARE

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have the ability to offer pre-application advice where it is requested?
- Has the planning authority held regular engagement events with developers and communities?
- Do the results from the customer and stakeholder survey show that customers are satisfied with the service offer by the planning authority?

Narrative

Does the planning authority have the ability to offer pre-application advice where it is requested?

The Planning Service encourages, and routinely offers, pre-application advice. The service is not chargeable and no differentiation is made between Local and Major Development proposals. Pre-application advice is often offered in respect of Householder proposals. Advice will normally

focus on Planning policy (local and national), site history and known constraints, siting and design, amenity issues and any need for specialist input (eg. archaeology, flooding assessment, biodiversity etc). In more complex cases, a site visit may be offered.

Consideration has been given to introducing a charge for Major Development proposals but the throughflow of Major Project applications is insufficiently consistent to underpin new staff resource, which would be the object of such charging. Also, the development of a pre-application advice charging scheme and its administration (including VAT liability implications) is not considered possible due to the absence of a Business Support manager who would ensure full cost recovery by overseeing billing, monitoring payments and recovering debt.

Has the planning authority held regular engagement events with developers and communities?

Engagement is held on demand and often with Local Authority colleagues. Housing is a key area where the Planning Service and Registered Social Landlord / Housing Association will collaborate and closer engagement with the construction sector on capacity for developer housing is planned.

Do the results from the customer and stakeholder survey show that customers are satisfied with the service offer by the planning authority?

The most recent NPI Customer and Stakeholder Survey was issued between 18 November and 9 December 2024. There were four responses, all from respondents who had discussed, or submitted, a Planning application. The most common type of respondent was the consultant / architect.

Consultation Snapshot:

Satisfaction with time taken – 100% ‘Very Satisfied’ or ‘Satisfied’

Standard of communication – 100% ‘Very Good’ or ‘Good’

Quality of information – 75% ‘Very Good’ or ‘Good’

Service offered by staff – 100% ‘Very Good’ or ‘Good’

Time taken to respond – 100% ‘Very Good’ or ‘Good’

Treated fairly – 100% ‘Strongly Agree’ or ‘Agree’

Overall satisfaction – 100% ‘Very Satisfied’ or ‘Satisfied’

ATTRIBUTE 10: THE PLANNING AUTHORITY HAS EFFECTIVE ENGAGEMENT AND COLLABORATION WITH STAKEHOLDERS AND COMMUNITIES

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Does the planning authority have a community engagement strategy and infrastructure in place to ensure engagement is early, collaborative, meaningful and proportionate?
- Has the planning authority undertaken community engagement, for example consistent and effective use of the Place Standard Tool, to inform decision-making processes? Has the planning authority encouraged and promoted planning applications to be submitted through the e-development portal?
- Has the planning authority engaged with a good representation of the community including young people, gypsies and travellers, people with protected characteristics, including disability, race, age, sex and sexual orientation, and including people from a range of socio-economic backgrounds?
- Has the planning authority supported the production of Local Place Plans when requested?
- Do the results from the customer and stakeholder survey show that stakeholders are satisfied with their collaboration with the planning authority?

Narrative

Does the planning authority have a community engagement strategy and infrastructure in place to ensure engagement is early, collaborative, meaningful and proportionate?

The Comhairle's Development Planning function takes an organised approach to community engagement with regard to Local Development Plan formation. The Local Development Plan process has been severely disrupted by the Ransomware incident of November 2023 but work is currently being taken forward on the Evidence Report which will be presented to the Comhairle for approval later in 2025 / 2026.

In addition to statutory identified groups that the Development Planning process is required to engage with (eg young people, disabled groups, the traveller community etc), the Development Planning team have met with various community groups including Community Landowning Trusts, Community Councils, specialist interest groups and so on. There has also been a direct mailing campaign to the retrieved contact database on the Local Development Plan process, the Development Plan Scheme, notification of Local Place Plans etc during the 2023 / 2024 reporting period.

There is a dedicated 'Working towards a New Development Plan' webpage with a number of tools, resources and means of engagement.

Has the planning authority undertaken community engagement, for example consistent and effective use of the Place Standard Tool, to inform decision-making processes? Has the planning authority encouraged and promoted planning applications to be submitted through the e-development portal?

As part of the new Local Development Plan engagement works we have set up the original Place Standard tool survey on our new Plan [webpage](#), along with the Disabled People and Children and Young Persons Place Standard survey lens.

Further, through collaborative work with colleagues in Community Learning and Development (CLD), we have secured access to Young Person Place Standards survey work which was undertaken in all schools in the islands. This data has yet to be analysed.

Has the planning authority engaged with a good representation of the community including young people, gypsies and travellers, people with protected characteristics, including disability, race, age, sex and sexual orientation, and including people from a range of socio-economic backgrounds?

As set out above, the Planning Service has sought to engage with groups of people with protected characteristics as part of the engagement and evidence gathering work for the new Local Development Plan. However, due to low populations and a lack of representatives, groups or actual individuals (eg travellers) in the Outer Hebrides, this work has had variable outcomes. Engagement with young people has been comprehensive and inclusive. Through different community and area / island groups we have sought to engage with people from a range of socio-economic backgrounds. Collaborative work with Public Health Scotland and NHS-Western Isles has helped with this, particularly through Community Planning Partnership Locality Plan (scaled at intermediate zone level) work.

Has the planning authority supported the production of Local Place Plans when requested?

We have established a dedicated [Local Place Plan](#) webpage, with a number of resources, guides and signposting. Advice and signposting has been offered to specific community groups and Community Councils who have requested it. Specific training was provided to Community Councils over three separate sessions covering all areas. In addition, we have briefed Community Development colleagues and Elected Members who are, or may be, engaging with groups preparing Local Place Plans.

However, as a very small team, we do not have the capacity to provide dedicated, resource-based support for the actual production of Local Place Plans beyond help with specific technical points, mapping etc. To date, two specific mailings / newsletter have been issued regarding Local Place Plans.

Do the results from the customer and stakeholder survey show that stakeholders are satisfied with their collaboration with the planning authority?

Results from the most recent NPI Customer and Stakeholder Survey, summarized under Attribute 9 above, indicate that stakeholders are 'Very Satisfied' or 'Satisfied' with the Planning Service.

Attribute	Score (1=Making excellent progress, 5= No progress)
9. This planning authority has good customer care	2
10. The planning authority has effective engagement and collaboration with stakeholders and communities.	2

Based on the grading above, outline any areas of improvement that are required and by whom and their level of importance (High/ Medium/ Low) and by when (short/ medium/ long term).

Improvement Action <small>What action will you take? What will the outcome be?</small>	Owner	Importance <small>High Medium Low</small>	Timescale <small>Short term – 1 year Medium term – 3 years Long term – 3+ years</small>	Resources
ATTRIBUTE 9: Work with IT colleagues to develop the Comhairle website's Planning area, including guidance on submitting a valid Planning application	Planning Managers	Medium	Medium Term	Planning Manager / IT Service Time
ATTRIBUTE 10: Introduce a Consultees Forum for statutory Planning consultees, internal and external, to share information on pipeline projects, provide support at particular pressure	Leadership Team	High	Short Term	Leadership Team Time

points and maintain good response times				
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A high performing planning authority should demonstrate place leadership by taking a collaborative place-based approach in line with the Place Principle. It should use the Place and Wellbeing Outcomes in decision-making processes, to achieve the three spatial principles outlined in NPF4: Sustainable places, where we reduce emissions, restore and better connect biodiversity; Liveable places, where we can all live better, healthier lives; and Productive places, where we have a greener, fairer and more inclusive wellbeing economy. The planning authority should seek to ensure that there are no impediments to delivering agreed development.

ATTRIBUTE 11: THE PLANNING AUTHORITY SUPPORTS THE DELIVERY OF SUSTAINABLE, LIVEABLE AND PRODUCTIVE PLACES

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Is the planning authority aware of the [Place and Wellbeing Outcomes](#), the evidence that sits behind them and is it using them in decision-making processes?
- Has the planning authority identified tools and approaches to delivering sustainable, liveable and productive places and is implementing them?

Narrative

Is the planning authority aware of the [Place and Wellbeing Outcomes](#), the evidence that sits behind them and is it using them in decision-making processes?

The authority is aware of Place and Wellbeing Outcomes, and these are being incorporated into Masterplanning, Development Briefs etc, and the emerging new Development Plan as they are progressed.

Has the planning authority identified tools and approaches to delivering sustainable, liveable and productive places and is implementing them?

This will be evidenced and informed as part of the Evidence Report and new LDP process, which is ongoing, and is structured around the 3 pillars of sustainable, liveable and productive places.

ATTRIBUTE 12: THE PLANNING AUTHORITY SUPPORTS THE DELIVERY OF CONSENTED DEVELOPMENT

Please consider the following when thinking about this attribute and how you have performed over the last year:

- Has the planning authority provided clear and proportionate expectations of Section 75 agreements and set these out in the LDP and pre-application discussions and they are concluded within 6 months of resolution to grant?
- Does the planning authority take a proportionate approach to imposing conditions?
- Does the planning authority have an ambitious local housing land requirement that exceeds the Minimum All Tenure Housing land requirements in NPF4 and is it on track to support delivery?
- Are the number of processing agreements the planning authority has agreed with applicants increasing?
- Does the planning authority have an effective delivery programme in place that supports the delivery of development on the ground?

Narrative

Has the planning authority provided clear and proportionate expectations of Section 75 agreements and set these out in the LDP and pre-application discussions and they are concluded within 6 months of resolution to grant?

The Planning Authority has only sought a very limited number of Section 75 agreements in recent years and these primarily related to wind energy development. The Supplementary Guidance for Wind Energy Development sets out expectations and Development Management officers seek to provide early warning of the need for such an agreement and seek to agree draft Heads of Terms in advance of approval of the related planning application. The Wind Energy SG sets out the requirements for Section 75s for defined wind farm developments, covering land restoration (including restoration bonds), off-site works, and safeguarding and remediation works.

Our experience post Covid was of lengthy delays by legal teams acting for the various interested parties with conclusions well beyond 6 months of resolution to grant.

Does the planning authority take a proportionate approach to imposing conditions?

Yes – conditions are imposed in accordance with the established tests

Does the planning authority have an ambitious local housing land requirement that exceeds the Minimum All Tenure Housing land requirements in NPF4 and is it on track to support delivery?

The Planning Authority works with Scottish Government: More Homes in the delivery of housing. The Comhairle's Resource Planning Assumption (it's annual allocation for housing) is between £6m and £9m per annum. In terms of delivery, the Comhairle is a 'Stock Transfer Council' and the affordable stock is managed by the Hebridean Housing Partnership (HHP), the single Registered Social Landlord for the Outer Hebrides.

The Comhairle also works with local Housing Association, Tighean Innse Gall in the delivery of non-affordable tenure housing such as Mid-Market Rent, Rent-to-Buy etc. Non-affordable housing provision is largely funded through the Rural and Islands Housing Fund, the Rural and Key Workers Housing Fund.

The Comhairle and its partners are moving into an intensive period of housing development, driven by Renewable Energy developers who will have to accommodate Wind Farm construction workers in Lewis between 2025 and 2030, up to 1,500 workers at peak. Securing 'Legacy Housing' for the local community is a key part of that discussion – newbuild housing or accommodation property refurbishment that will pass back to the local Registered Social Landlord or Housing Association on departure of the workers in 2030.

The Comhairle sets the five year Housing Strategy and manages delivery with its partners through the Strategic Housing Investment Programme or SHIP. The SHIP will identify sites for development and attach timeline and budget to these developments. The landowning situation in the Outer Hebrides (and the other Crofting Counties) is unique in that almost all land is under Crofting tenure. The provision of multiple unit housing sites will require development on 'Common Grazings' or land held in common by a group of township Crofters. Access to this land requires unanimous agreement between all the Crofters concerned and objections can lead to long, drawn out legal processes involving the Scottish Land Court.

The supply of good quality housing land is further constrained by topographic conditions in the islands. In many cases, deep peat or rock will prevent development of identified sites. Good quality farmland is available around the main town of Stornoway but the Comhairle has imposed a 45% / 55% split between new housing provision in Stornoway (45%) and in rural areas (55%).

In recent years, the Planning Service has encouraged a Planning Brief / Masterplan approach for major housing developments and this is working very well (reference the December 2023 SURF Housing and Regeneration Award presented to Goathill Housing and Care Home, a mixed-use development taken forward by the Comhairle and HHP). Despite the constraints outlined above, the Comhairle is on track to support delivery of the housing allocation set out in the current SHIP. If anything, there is likely to be over-provision of housing going forward as the wave of developer housing is delivered and this will be a challenge for a small Planning Service. It is important to

note that the Comhairle's regular affordable housing allocation will be delivered irrespective of developer intentions – any housing provided by developers will be additional to core affordable housing.

The MATHLR figure of 192 set in NPF for the Comhailre area is extremely conservative and will easily be met and exceeded in terms of delivery of housing over 10 for all tenures. This figure stayed low due to population projections, but doesn't not reflect the consequential and additional housing resulting from the major energy and infrastructure projects planned.

Are the number of processing agreements the planning authority has agreed with applicants increasing?

No. While the Comhairle does offer Processing Agreements, there is not wide uptake of these as a Project Management tool. Committing to achieving milestones is a challenge when the Development Management team is under resourced.

Does the planning authority have an effective delivery programme in place that supports the delivery of development on the ground?

Under the current LDP the authority has an approved Action Programme. This will be updated as a Delivery Programme when it is next reviewed, which has been delayed due to the cyber attack, and loss of original documents, data and specific stakeholder contacts.

Attribute	Score (1=Making excellent progress, 5= No progress)
11. The planning authority supports the delivery of sustainable, liveable and productive places	2
12. This planning authority supports the delivery of appropriate development	3

Based on the grading above, outline any areas of improvement that are required and by whom and their level of importance (High/ Medium/ Low) and by when (short/ medium/ long term).

Improvement Action	Owner	Importance	Timescale	Resources
What action will you take? What will the outcome be?		High Medium Low	Short term – 1 year Medium term – 3 years Long term – 3+ years	

ATTRIBUTE 11: Chief Planning Officer to chair Strategic Local Partnership for Housing Group, aligning Government Housing allocation with local delivery on a place-based basis	Chief Planning Officer	High	Short Term	Chief Planning Officer Time
ATTRIBUTE 12: Introduce regular meetings between the Chief Planning Officer and construction sector representatives	Chief Planning Officer	High	Short Term	Chief Planning Officer

