



SCOTTISH GOVERNMENT COMMUNITY BENEFITS CONSULTATION

Report by Chief Planning Officer

PURPOSE

- 1.1 The purpose of the Report is to seek homologation of a submitted response to the Scottish Government's Consultation on 'Community Benefits from Net Zero Developments'.

EXECUTIVE SUMMARY

- 2.1 A Scottish Government consultation on 'Community Benefits from Net Zero Energy Developments' closes on 11 April 2025. A draft response was considered and endorsed by the Energy Member Officer Working Group on 27 March 2025. By the time the Committee meets, the response will already have been submitted, and homologation of that response is now sought.
- 2.2 Key points raised in the Comhairle's draft consultation response relate to the definition of community and the importance of local authorities being recognised as representative of their communities. It suggests the need to differentiate between host communities, directly impacted by deployments, and the wider community across a local authority area, both of which should receive some level of community benefit from renewable deployments.
- 2.3 It argues that community benefit needs to be considered at a strategic in addition to local level, and that the Local Authority should be central to decision making and governance of strategic-level community benefit, in close consultation with community interests.
- 2.4 Given experiences with Scotwind lease revenues, the consultation response comes out strongly against any suggestion of a National Community Benefit Fund.
- 2.5 Finally, the Comhairle's response proposes that Scottish Government guidance on level of community increases to at least £7.3k per MW, be applicable to offshore and onshore wind, and to move from a voluntary to a mandatory commitment. It also suggests that community benefit expectations from Scottish Government be strengthened to encompass profit share mechanisms, and options for community shared ownership.

RECOMMENDATION

- 3.1 **It is recommended that the Comhairle homologate the response to the Scottish Government's 'Community Benefits from Net Zero Energy Developments' consultation.**

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Appendix: 1. Response to Scottish Government consultation on 'Community Benefits from Net Zero Energy Developments'.

Background Papers: None

IMPLICATIONS

4.1 The following implications are applicable in terms of the Report.

Resource Implications	Implications/None
Financial	None
Legal	None
Staffing	None
Assets and Property	None
Strategic Implications	Implications/None
Risk	Approach seeks to reduce levels of risk.
Equalities	None
Corporate Strategy	Supports the Corporate Strategy 2022-2027 ambition to strengthen the local economy.
Environmental Impact	None
Consultation	None

BACKGROUND

5.1 A Scottish Government consultation on 'Community Benefits from Net Zero Energy Developments' closes on 11 April 2025. A draft response was considered and endorsed by the Energy Member Officer Working Group on 27 March 2025. By the time the Committee meets, the response will already have been submitted, and homologation of that response is now sought. The full response is at Appendix 1.

SUMMARY OF RESPONSE

6.1 Key points raised in the Comhairle's consultation response are:

- the consultation struggles to define 'the community' with regard to Community Benefit and there is the conventional implicit assumption that Community Benefit should not go to the Local Authority;
- it should be recognised that the Local Authority is directly representative of the community and, to a large extent, is the community – unhelpful distinctions between community groups and the Local Authority should be resisted;
- State Aid and potential displacement of General Revenue Grant currently constrain the Local Authority's ability to handle Community Benefit funds – legislative solutions should be found to remove this constraint;
- the Comhairle recognises two broad geographic categories of community: a) the Host Community which is directly impacted by deployments; and, b) the Local Authority Area Community which is more indirectly impacted but directly invested in the delivery of projects;
- other, non-geographic, 'sub-communities' exist whose needs and views should be considered, for example the Fisheries Community, the Sea User Community, the Heritage Community etc;
- within the geographic extent of the wider Local Area Community, benefit should be strategic and not just local, extending to affordable electricity programmes, investment in core community services and key elements of infrastructure (through the Local Authority);
- decisions on strategic Community Benefit should ultimately be made by the Local Authority which is elected and accountable, following close engagement with key community interests;
- the Comhairle is firmly opposed to a 'National Community Benefit Fund' resourced from Offshore Wind development – Government is set to receive considerable revenues from lifetime seabed leases and voluntary Community Benefit should be left with affected communities (experience with ScotWind lease option fees is referenced);
- the minimum rate for Community Benefit should be £7,500 per MW and consideration should be given to a floating profit share Community Benefit;

- the (voluntary) Comhairle / Northland Power / West Side Estate Group Memorandum of Understanding represents good practice in Community Benefit agreement but Offshore Wind Community Benefit should be mandatory and not voluntary;
- the Comhairle / Stornoway Trust Shared Ownership Joint Venture for Onshore Wind represents good practice in the conclusion of Community Benefit arrangements;
- affordable electricity through peer-to-peer arrangements between consumers and local generators should be a feature of all Community Benefit arrangements; and,
- all Community Benefit principles should be thoroughly 'island proofed'.

CONCLUSION

- 7.1 This is an important consultation and has offered the opportunity to highlight views regarding the future expectations of developers in respect of community benefit, and the importance of the Comhairle's role in strategic decision making on community benefit funding.

Scottish Government Consultation on Community Benefits from Net Zero Energy Developments

Response from Comhairle nan Eilean Siar

Question 1: In the context of offshore wind development, what or who or where do you consider the relevant communities to be?

In its consideration of Offshore Wind developments, the Comhairle recognises two communities: a) the Host Community which is most impacted by the deployment in terms of visual impact and impacts on local infrastructure, environment and services; and, b) the Local Authority Area Community which equates to the Local Authority area – in the Comhairle's case, the entire island chain of the Outer Hebrides from Lewis to Barra.

Within these two broad geographic categorisations of community, there will be communities of interest who may be impacted by Offshore Wind development, for instance the Fisheries community, the wider Sea User community, the Heritage community and so on.

Question 2: When defining the relevant communities to receive benefits from offshore wind development, which factors should be considered, and by whom? Are there any factors which are most important, and why?

Offshore Wind is of a scale that the benefits should be strategic as well as local. The Host Community should, of course, receive benefit to mitigate the direct impact of the deployment and this could be in terms of visual impact, disruption to infrastructure and services, influx of new population and so on. However, the scale of Offshore Wind means that these deployments are being hosted not just by the directly impacted local Host Community but by the entire region or the Local Authority Area Community. The impact of a large Offshore Wind Farm is felt across the entire Local Authority area and a proportional amount of benefit should flow to the wider area in order to minimise negative impacts and maximise positive impacts. These positive impacts could, for example, include activation of supply chain elements or improved community services in other parts of the Local Authority area and Wind Farm benefit should support this.

Visual impact and disruption are clearly factors that should be considered by decision makers. Although environmental concerns will be raised in response to any development of scale, reliance should be placed on professional Environmental Impact Assessments to identify, and propose mitigations for, these concerns.

In terms of positive impact, benefits for the Host Community are a given and these could include measures to deliver affordable electricity to support for new housing, alleviation of Fuel Poverty, support for new business start up, support for local food security and so on. Benefits for the Local Authority Area Community could include a wider affordable electricity programme, support for the regional supply chain and, critically, support for core community services which, in a time of Government austerity, Local Authorities are increasingly challenged to deliver. While the Scottish Government provide a Resource Planning Assumption for affordable housing year by year, there is no corresponding support for private housing. A large proportion of the private sector housing stock in the Western Isles is of standard design, emerging through successive rounds of Crofter housing grant support. These stone built (1920's) and poured concrete built (1950's) homes defy conventional energy efficiency interventions so energy efficiency works are relatively expensive (external insulation etc). Couple this with a very aggressive climate which leads to early failure of roof, window and door components and the outcome is a stock that requires constant upgrade and refurbishment. During the 1990's, the Comhairle had a Private Housing Improvement and Repair budget of up to £4m per annum and most of these properties were improved. That budget no longer exists and a large number of private homes are now due for improvement, repair and energy efficiency work again with no funding programme to support them. Improvement of the private sector housing stock through the Local Authority should, therefore, be a key element of future Community Benefit programmes.

Question 3: Who should decide how offshore wind community benefits are used (decision-makers)? Are there any groups, organisations or bodies you feel should have a formal role in this?

Decision makers should be led by the elected and accountable Local Authority and there should be clear acceptance of the fact that the Local Authority directly represents the community and, to some extent, is the community. Over recent years, an unhelpful distinction has arisen which identifies community groups as 'the community' while regarding the Local Authority as some distant arm of Government, unrepresentative of 'the community'. The role and standing of the Local Authority in the negotiation and disbursement of Community Benefit revenues should be bolstered and celebrated as those making decisions are directly accountable to the community at the ballot box.

Very shortly, the Local Authority will have insufficient central financing available to deliver core services to the community. At the same time, community groups may not be equipped to deliver these services to the required standards. It should be recognised that the Local Authority contains all the expertise required to guide Community Benefit towards the best outcomes (governance, legal, financial, procurement, project design and management, audit, community empowerment, service delivery etc). There should be no presumption against Community Benefit going to the Local Authority to support the common good – indeed, this should be encouraged and legislated for so that remote areas with poor economic prospects are able to maximise the Offshore Wind bonanza through new and improved community services.

In the Comhairle's experience, particular community areas, driven by talented residents, have the ability and capacity to access significant funding for projects in that community area. Meanwhile, the neighbouring community area has no such resource and is unable to access funding. Community development therefore becomes unevenly distributed with some areas moving forward rapidly while other communities stand still or go backwards. Offering large volumes of Community Benefit to the community on a competitive, 'survival of the fittest', basis will simply deepen this inequality. The Comhairle's Community Regeneration service was purposefully set up to equalise the development opportunity across all community areas so Community Benefit should be channelled through the strategic lens of the Comhairle's Community Regeneration service in order to ensure that all community areas develop at the same pace.

Naturally, community groups should be encouraged to seek maximum Community Benefit and should work with Local Authorities in pursuance of an agreed development strategy for the region. The newly introduced Local Place Plans could be an appropriate conduit for this joint working between the Local Authority and community interests.

Question 4: What are the best ways to ensure that decision-makers truly reflect and take into account the needs and wishes of communities when determining how community benefits are used?

For ScotWind Offshore Wind around the Outer Hebrides, the Comhairle engaged directly with the community land-owning estates most impacted by planned deployments. The Development Plans of these estates were reviewed and re-presented in tripartite Memoranda of Understanding between the Local Authority, Offshore Wind developers and these community land-owning estates. In this way, the heft and credibility of the Local Authority can be levered for the benefit of the community in the pursuance of agreed outcomes.

For wider, Local Authority Area, support, the Local Authority's Corporate Strategy (which has been subject to exhaustive community consultation) should be used to guide the investment of Community Benefit for the wider good.

Question 5: What could be done to help maximise the impact of community benefits from offshore wind? What does good look like?

In addition to specific support for directly impacted Host Communities, a proportion of Community Benefit should go to the Local Authority Area Community, facilitated by the Local Authority as the elected and accountable representative of the local community. An arms length, not-for-profit Development Trust, with direction from the Local Authority and utilising Local Authority experience in community empowerment, financial management, legal analysis, procurement, engineering and design etc, could then leverage this funding and deliver projects of scale which would otherwise be out of the reach of individual community groups.

Question 6: How do you think directing community benefits towards larger scale, longer term, or more complex projects would affect the potential impact of community benefits from offshore wind?

Onshore Wind Community Benefit Guidance suggests a rate of £5K per MW but this Guidance has been in place for over ten years with no allowance for inflation. The current equivalent would be at least £7.5K per MW with some Local Authorities arguing for a baseline of £12K per MW. Even at £7.5MW, Community Benefit from a typical 1GW Offshore Wind Farm would be £7.5m per annum. First priority should be given to supporting large scale, long term projects which are transformational for the local economy and bring unprecedented multiplier benefits of their own. This is an area where the Local Authority, as representative of the community, could play a critical role for the wider good, leveraging this Community Benefit to transform community services and improve transport links for the use of all which could never, otherwise, be funded.

Question 7: The development of offshore wind is often geographically dispersed with multiple communities who could potentially benefit. To what extent do you agree or disagree that a regional and/or national approach to delivering community benefits would be an appropriate way to address geographical dispersal of development and multiple communities? Please explain your answer.

The Comhairle is absolutely opposed to a 'National Fund' for the revenues from Offshore Wind. By fortunate happenstance, the location of the UK's best Offshore Wind resource coincides with fragile communities which have suffered from chronic underinvestment for decades. Ignored by successive Governments, these communities have seen traditional industries decline, transport links eroded, disproportionate cuts in Local Authority funding and crisis levels of depopulation. Now, for the first time in history, these fragile communities are to host the development of a national interest industry – Offshore Wind – which has the potential to turn regional economics on its head. Billions of pounds worth of private contracts, with all the associated supply chain and societal benefits, are to pour into these neglected communities and any resulting Community Benefit which is, after all, a very small percentage of overall profit, should be left in these communities. This is particularly the case when it is clear that these remote communities are having to suffer considerable visual and disruption impact in the interests of national energy security and UK carbon reduction targets. The question then is, why shouldn't these fragile communities be compensated adequately for 'taking one for the nation'.

The Comhairle's experience of a national fund from Offshore Wind has not been positive. When ScotWind lease options were sold off, £760m was realised. In the spirit of the Smith Commission and later First Minister promises, we believed that these funds would be returned to the Local Authority areas hosting ScotWind deployments to enable these Local Authorities to carry out infrastructure, port and supply chain improvements in preparation for Offshore Wind delivery. Of the £760m, £31m was taken from the three ScotWind sites in Hebridean waters: N2, N3 and N4. In the event, the Scottish Government decided to divert all ScotWind lease option revenue into its own budget and none of it was returned to ScotWind hosting areas. This has left the Outer Hebrides with ill-equipped ports, a roads infrastructure inadequate for the transit of Offshore Wind components and a poorly prepared supply chain. From this experience, it is clear to the Comhairle that all Offshore Wind Community Benefit should go to the Host Community or the Local Authority Area Community. There should be no wider-region or national Community Benefit fund.

Question 8: Are you aware of any likely positive or negative impacts of the Good Practice Principles on any protected characteristics or on any other specific groups in Scotland, particularly: businesses; rural and island communities; or people on low-incomes or living in deprived areas. The Scottish Government is required to consider the impacts of proposed policies and strategic decisions in relation to equalities and particular societal groups and sectors. Please explain your answer and provide supporting evidence if available.

Good Practice Principles should deliver on their promise that "composition, delivery and structure of Community Benefits packages should be designed through dialogue with the local community" [principally with the Local Authority as the elected and accountable representative of the local community]. Offshore Wind Community Benefit is an opportunity for the fortunes of fragile island economies to be reversed and for these communities to become the powerhouse of a new, low carbon Scotland and UK. Too often, the legal requirement for Island Impact Assessment is given lip service and it will be vitally important that any emerging Community Benefit policy is subjected to a thorough, inclusive and transparent Island Community Impact Assessment as required by the Islands (Scotland) Act 2018.

Question 9: In your view, what would just and proportionate community benefits from offshore wind developments look like in practice?

'Just' implies nobody left behind and 'proportionate' means balanced with the disbenefit suffered by the host community. Just and proportionate Community Benefit means a volume of funding which truly reflects the disbenefit and disruption being suffered by host communities in delivering the UK's decarbonisation agenda with this funding delivered in a way that benefits the entire impacted community – Host Community and Local Authority Area Community. There is no place for a wider 'regional' or 'national' Community Benefit fund given what will be required to recover decades of under investment in fragile communities and the unprecedented levels of seabed rent that will return to Government over wind farm lifetimes.

Question 10: What processes and guidance would assist communities and offshore wind developers in agreeing appropriate community benefits packages?

The per MW is a crude indicator and requires updating from its ten year old (Onshore Wind) benchmark. A floating profit share, set at a realistic level, may be more appropriate. Identification of projects for assistance should be a community exercise, led by the Local Authority who will be equipped to deliver true and enduring community empowerment. It should not be left to Offshore Wind developers to dictate where and how their Community Benefit contribution is to be spent.

Question 11: What do you see as the potential of shared ownership opportunities for communities from offshore wind developments? Please explain your answer.

The Comhairle is a national leader in Onshore Wind Shared Ownership with 20% Shared Ownership Agreements concluded in respect of two 200MW Wind Farms in Lewis. This Shared Ownership will place 80MW+ in the hands of the local community and the Local Authority has played a central role in developing this opportunity.

There is clearly potential in extending these arrangements to the Offshore Wind environment subject to the following provisos: the developer should bear the entire development risk through consenting, public engagement etc; the community interest should be permitted to buy into its share at capex cost and not at market value; the developer should be prepared to loan the community interest the funds required for purchase; and, the community interest should inherit the parent Wind Farm Contract for Difference to insulate itself from market shocks.

Consideration should be given to a Peer-to-Peer electricity trading arrangement between Wind Farm developer and community so that discounted electricity can be offered to a community offtaker for distribution to consumers within the Local Authority area. This may require regulatory changes from Ofgem but will go some way to combatting rampant Fuel Poverty levels in island and remote areas which are set to become the largest contributors to security of UK energy supply and UK decarbonisation targets.

Question 12: Thinking about the potential barriers to shared ownership of offshore wind projects, what support could be offered to communities and developers to create opportunities and potential models, and for communities to take up those opportunities? Potential barriers include high costs of offshore wind development, community access to finance and community capacity.

As above. The developer should bear all development risk; Shared Ownership should be offered to the community six months after successful commissioning; ownership should be of a share of generation and not of individual turbines; the community should inherit the parent Wind Farm CfD; the developer should become lender to the community interest; and, the Local Authority should lead on arrangements to ensure capacity, credibility and accountability.

ONSHORE CONSULTATION QUESTIONS

Question 1a): Which of the following onshore technologies should be in scope for the Good Practice Principles? Select all that apply.

- Wind ✓
- Solar ✓

- **Hydro power (including pumped hydro storage) ✓**
- **Hydrogen** (technology too embryonic at present)
- **Battery storage ✓**
- **Heat networks ✓**
- **Bioenergy ✓**
- **Carbon Capture, Utilisation and Storage (CCUS)** (technology too embryonic at present)
- **Negative Emissions Technologies (NETs) ✓**
- **Electricity transmission ✓** (current UK Government proposals fall woefully short given the impact of Transmission infrastructure)
- **Other – please specify in question 1b**
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Question 1b): Please explain your reasons for the technologies you have selected or not selected and provide evidence where available.

Noted above. In short, all established, revenue generating technologies should come into scope for Community Benefit. And Shared Ownership by the community should be a default position.

Question 2: Should the same Good Practice Principles apply in a standard way across all the technologies selected, or should the Good Practice Principles be different for different technologies? Please explain the reasons for your answer and provide evidence where available.

Principles should be different for different technologies. Older established technologies should contribute most while marginal returns and high development risk with newer technologies should be factored in. Community Benefit should be commensurate with revenue levels, possibly on a variable profit share basis.

3.3.2 Improving the Good Practice Principles

Question 3: Do improvements need to be made to how eligible communities are identified? For example, changes to how communities are defined at a local level, and whether communities at a regional and/or national level could be eligible. Please explain your answer and provide supporting evidence if available.

As with Offshore Wind, benefitting communities should be: a) the Host Community most impacted by deployment; and, b) the Local Authority Area Community. Within these two broad categorisations, there will be relevant communities of interest.

Question 4: Should more direction be provided on how and when to engage communities in community benefit opportunities, and when arrangements should take effect? Please explain your answer and provide evidence/examples of good practice where available.

The ScotWind process provides an example of good practice which has worked its way through to a £4.5m per annum, index linked over 35 years, contribution to a relatively small Host Community in the Outer Hebrides. In the beginning, the developer engaged with the Local Authority who, in turn, engaged with the local community on the type of Community Benefit being sought. A joint Local Authority / Community / Developer Memorandum of Understanding set out the development ambitions of the community in detail and invited the developer to support listed projects. Within an entirely voluntary environment that has now worked through to a developer contribution of £4.5m per annum, index linked over 35 years. This level of funding is transformational to the communities in question and ensures the survival and growth of new community land ownership ventures. The key point here is the Local Authority's role in leading the process in close consultation with the community.

Question 5: How could the Good Practice Principles help ensure that community benefits schemes are governed well? For example, what is important for effective decision-making, management and delivery of community benefit arrangements? Please explain your answer and provide evidence/examples of good practice where available.

Again, involvement of the Local Authority ensures capacity, integrity, credibility, openness and accountability. A properly resourced Local Authority will contain all the skills and expertise required to deliver the largest Community Benefit or Shared Ownership scheme with strong involvement from the community. In return,

Community Benefit Principles must provide for a portion of benefit to return to the Local Authority for the continued provision of lifeline community services.

Question 6: How could the Good Practice Principles better ensure that community benefits are used in ways that meet the needs and wishes of the community? For example, more direction on how community benefits should or should not be used, including supporting local, regional or national priorities and development plans. Please explain your answer and provide evidence/examples of good practice where available.

The Local Authority is best placed to dispassionately advise on key areas for investment. Future Local Development Plans and the new provision for Local Place Plans provide a good platform for guided investment decisions, democratically concluded, which will benefit the wider community and not be restricted to the interests of one small group. No Community Benefit from island areas should be applied to national or sub-national priorities – the need for investment, regeneration and transformation in long-neglected communities is so pressing.

Question 7: What should the Good Practice Principles include on community benefit arrangements when the status of a new or operational energy project changes? For example, reviewing arrangements when a site is repowered or an extension is planned, or when a new project is developed or sold.

Yes, where there is any potential change in the economic standing of a project, the Community Benefit offer should be reviewed.

Question 8: Should the Good Practice Principles provide direction on coordinating community benefit arrangements from multiple developments in the same or overlapping geographic area? If so, what could this include? Please explain your answer and provide evidence/examples of good practice where available.

Yes. Host Community benefits should be handled by the communities most impacted by development. Wider Local Authority Area Community benefit should be handled by a single Development Trust, guided by the Local Authority. This arrangement will ensure investment in accordance with a single development plan or agreed development principles and will foster consistency in funding strategy. Also, large infrastructure projects can be delivered by this single Trust coordinating the interests of a range of affected areas. Without this coordination, funding would lapse towards a multitude of small parochial projects and transformational impact will be lost. Where required, changes in legislation should be considered to allow Local Authorities to hold and disburse Community Benefit without penalty.

Question 9: What improvements could be made to how the delivery and outcomes of community benefit arrangements are measured and reported? For example, the Good Practice Principles encourage developers to record and report on their community benefit schemes in Scotland's Community Benefits and Shared Ownership Register. The register showcases community benefits provision across Scotland using a searchable map.

Local Authority performance management systems could be extended to cover Community Benefit delivery with a Development Plan in place and delivery measured through performance indicators. This is not unlike the established performance management system already in place across all Scottish Councils and outcomes from these systems could feed into a central register.

Question 10: In addition to the Good Practice Principles, what further support could be provided to communities and onshore developers to get the most from community benefits? For example, what challenges do communities and onshore developers face when designing and implementing community benefits and how could these challenges be overcome? Please explain your answer and provide evidence/examples of good practice where available.

Additionality is a key consideration. Individual communities will pursue individual projects but, with an overarching Development Trust in place, opportunities for additionality can be maximised. Large infrastructure projects can be brought forward with the agreement of affected communities and area funds can be aggregated to lever considerable additional (external) funding. Again, the capacity and expertise of the Local Authority will be key in this regard.

3.3.3 Setting a funding benchmark

Question 11: Do you think that the Good Practice Principles should continue to recommend a benchmark value for community benefit funding? The current guidance recommends £5,000 per installed megawatt per year, index-linked (Consumer Price Index) for the operational lifetime of the energy project.

Yes ✓ *If a benchmark figure is to be used, it must be uplifted to take account of inflation and modern Wind Farm economics. £7.5K per MW would be an absolute minimum but £10K per MW might be found to be more realistic. Serious consideration should also be given to a floating and transparent profit share dividend for the community. And more emphasis should be placed on alternative, empowering, Community Benefit measures like Shared Ownership, Electricity Trading and Donation of Electrons for (Community) Hydrogen Production. Although challenging, these arrangements can be more empowering for participating communities and can build skills and expertise in rural communities. When electricity is simply exported out of a rural community, the value is added to that community at its destination. Why not maximise local added value by supporting, as a Community Benefit option, electrons into Hydrogen and synthetic fuel production which will add value, attract back skilled jobs and generally raise skill levels in rural communities?*

No

Don't know

Question 12a): Should the benchmark value be the same or different for different onshore technologies? Please explain your answer.

Yes. The economics of every technology are different. Rates of return would have to be scrutinised technology by technology to ensure best value for the community.

Question 12b): How could we ensure a benchmark value was fair and proportionate for different technologies? For example, the current benchmark for onshore is based on installed generation capacity but are there other measures that could be used? Please provide any evidence or data to support your preferred approach.

An investigation of developer accounts should indicate a fair per MW rate for installed technology but a floating profit share arrangement may be more fair and appropriate as this could generously recompense the community in a strong market but not unfairly disadvantage the developer in a weak market.

3.3.4 Assessing impacts of the Good Practice Principles

Question 13: Are you aware of any likely positive or negative impacts of the Good Practice Principles on any protected characteristics or on any specific groups in Scotland, particularly: businesses; rural and island communities; or people on low-incomes or living in deprived areas? The Scottish Government is required to consider the impacts of proposed policies and strategic decisions in relation to equalities and particular societal groups and sectors. Please explain your answer and provide supporting evidence if available.

The application of Good Practice Principles should be rigorously 'island proofed' to ensure no disadvantage to island communities. This will require thorough, inclusive and transparent Island Community Impact Assessment as legally required by the Islands (Scotland) Act 2018.