

Topic Paper 05: Vacant, Derelict Land and Buildings

Information required by the Act regarding the issue addressed in this section:

Town and Country Planning (Scotland) Act 1997 (as amended):

- Section 15(5): The physical and environmental characteristics of the district.

NPF4 requirements for LDP:

NPF4 Policy 9:

LDPs should set out opportunities for the sustainable reuse of brownfield land including vacant and derelict land and empty buildings.

Links to Evidence:

National

- [National Planning Framework 4 \(NPF4\) \(Scottish Government, 2023\)](#)
- [Scottish Biodiversity Strategy to 2045 \(Scottish Government, 2024\)](#)
- [Update to the Climate Change Plan 2018-2032: Securing a Green Recovery on a Path to Net Zero \(Scottish Government, 2020\)](#)
- [Open Mosaic Habitats High Value Guidance: When is Brownfield Land of 'High Environmental Value'? \(Wildlife and Countryside Link, 2015\)](#)
- [Homes for Scotland Briefing Paper: The Barriers to Housing Delivery](#)

Local

- [Argyll and Bute Local Development Plan 2](#)
- [Oban Urban Capacity Study 2025 \(Ironside Farrar upon publication\)](#)
- [Helensburgh Urban Capacity Study 2025 \(Stantec\)](#)
- [Community Regeneration Partnership Funding](#)

Datasets

- [Scottish Government's 6-fold Urban Rural Classification](#)
- [Buildings at Risk Register](#)
- [Scottish Vacant and Derelict Land Survey 2024](#)
- Argyll and Bute Council 2024 [Housing Land Audit \(HLA\)](#)
- NDR: Empty Properties (Internal database held by Economic Development)
- Scottish Government [Housing statistics: Second homes and empty properties](#)
- SEPA's [list of contaminated sites](#)

Summary of Evidence

Introduction

This section of the evidence report focuses on vacant and derelict land, brownfield sites, and empty buildings in Argyll and Bute (excluding the area covered by the Loch Lomond and the Trossachs National Park which has its own planning authority) and sets out the relevant issues. NPF4 Policy 9 relates directly to these issues, with the aim to encourage, promote and facilitate the reuse of brownfield, vacant and derelict land and empty buildings, and to help reduce the need for greenfield development. Furthermore, Policy 9 states that the contribution of brownfield land to nature recovery is recognised and opportunities for use as productive greenspace are realised where appropriate.

Argyll and Bute is a predominantly rural/remote rural area, as established by the [Scottish Government's 6-fold Urban Rural Classification](#) (2022), and as such, has a very small hectareage of land is classified as vacant, derelict or brownfield. Most of the settlements in Argyll and Bute do not meet the criteria of having a population greater than 2000 and are therefore not included in the national survey.

Studies, such as the [one completed on behalf of the Scottish Land Commission](#), show that living next to vacant or derelict land can have a wider impact on health and wellbeing, as well as have negative impacts in terms of local economy and the environment. Therefore, it is important to promote the redevelopment of sites where appropriate. This is particularly relevant in Argyll's main towns and key rural settlements, where redevelopment can reduce the need for private car journeys, build on existing infrastructure, reduce carbon emissions and minimise greenfield land uptake.

Due to the nature of the topic, the paper aligns with other topics within in the evidence report. Those most relevant are highlighted below:

Topic 03: Biodiversity

Topic 04: Historic Assets and Places

Topic 08: Design, Quality and Place & Local Living

Topic 09: Housing

Topic 11: Green and Blue Infrastructure

Topic 18: Green Belt

Exiting Policy Framework

LDP 2 Policy 01 – Settlement Areas and Policy 22 – Economic Development support the intent of Policy 9 of NPF4 by advocating housing and commercial developments on brownfield land, especially in settlement areas. In the case of commercial developments, proposals on windfall sites are encouraged to develop brownfield land, where possible, and avoid greenfield sites if brownfield land is in close proximity to the site location. The term brownfield land may include those classed as vacant or derelict land.

National Context

The Scottish Vacant and Derelict Land Survey 2025

The Scottish Vacant and Derelict Land Survey (SVDLS) is a register of each urban vacant and derelict site updated annually in autumn with data returns from Scottish local authorities to the Scottish Government and published the following spring. The process involves tracking the annual change in the use of brownfield land and identifying new sites that have become vacant or derelict. These sites are digitally mapped, and key details are recorded, including the site's previous use, the potential for reuse, and an approximate timeframe for redevelopment. Sites in the survey are classified into two categories:

- Vacant Land – Brownfield sites located within settlements with a population greater than 2000 that are ready for redevelopment.
- Derelict Land – Brownfield sites, either within or outside settlements, which are not currently suitable for redevelopment, for example, due to unusable buildings.

The SVDLS requires planning authorities to identify sites that have been removed from the survey since the previous return, for example, due to development commencing or the site becoming naturalised over time. The survey does not include vacant brownfield sites located outside settlement boundaries.

Argyll and Bute continue to report annually to the SVDLS process, with the most recent submission provided to the Scottish Government in November 2025. The 2025 SVDLS return identifies 57.02ha of vacant and derelict land, across 28 sites. The figure of 57.02ha includes a previous industrial site in Ardyne (Bute and Cowal) that accounts for just under half the total hectareage for the whole of Argyll and Bute at 27.86ha. This site is identified in LDP2 as part of a larger Potential Development Area (P1007).

A short summary of the rest of the SVDLS findings is:

- Of the 28 sites identified, 6 are classed as derelict, with 22 classed as vacant land/vacant land and buildings
- The 6 derelict sites classed as derelict account for 43.26ha of the total VDL figure (75.87%)
- Approximately 68% of the sites submitted in the SVDLS are under 1ha
- Around Half of the sites are considered to be developable in the medium term (+5 years).

There is no trend in location of vacant and derelict sites across Argyll and Bute with each of the six main towns containing vacant and/or derelict sites. Of all the administrative areas, Bute and Cowal has the highest proportion of sites, with 13 sites accounting for over 48% of the total. Bute and Cowal, and Mid Argyll and Kintyre contain four of the six main towns in Argyll and Bute which represent a higher percentage of vacant and derelict sites in comparison to the other two administrative areas. A breakdown of the percentage of SVDLS sites by administrative area can be found below in figure 1.

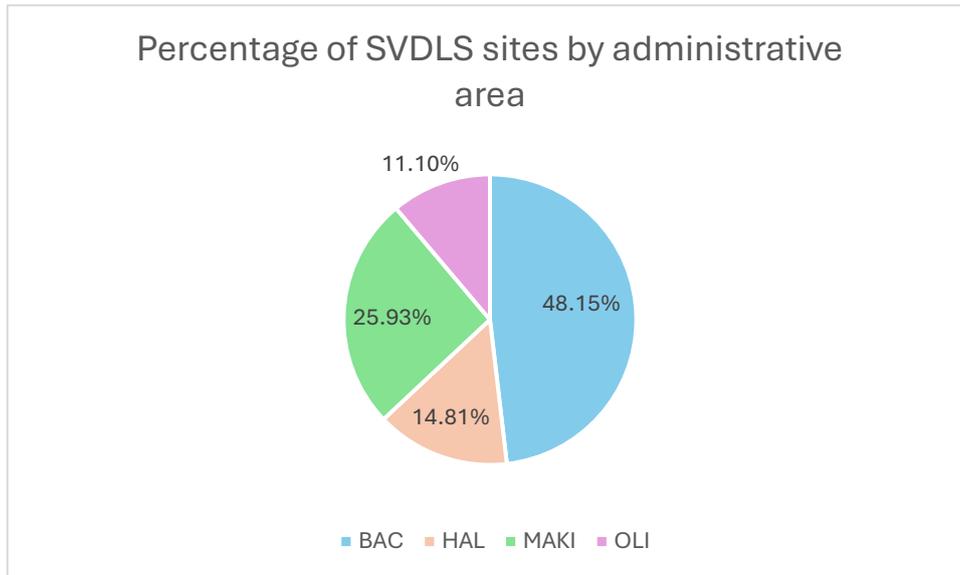


Figure 1: Percentage breakdown of vacant and derelict sites in Argyll and Bute by administration area

The most recent SVDLS returns show that Argyll and Bute’s volume of vacant and derelict land has changed very little over a five-year period (figure 2), with most of the sites remaining undeveloped over that timescale. Only four sites have deemed short-term development potential (<5 years), which is consistent with the trends in uptake of vacant and derelict land and lack of progression on these sites. An additional site has been added, a former fish farm site in Tayinloan at 9.48ha, accounting for approximately 17% of the total figure in Argyll and Bute.

Figure 2 shows the change per year of vacant and derelict land in the SVDLS returns for Argyll and Bute.

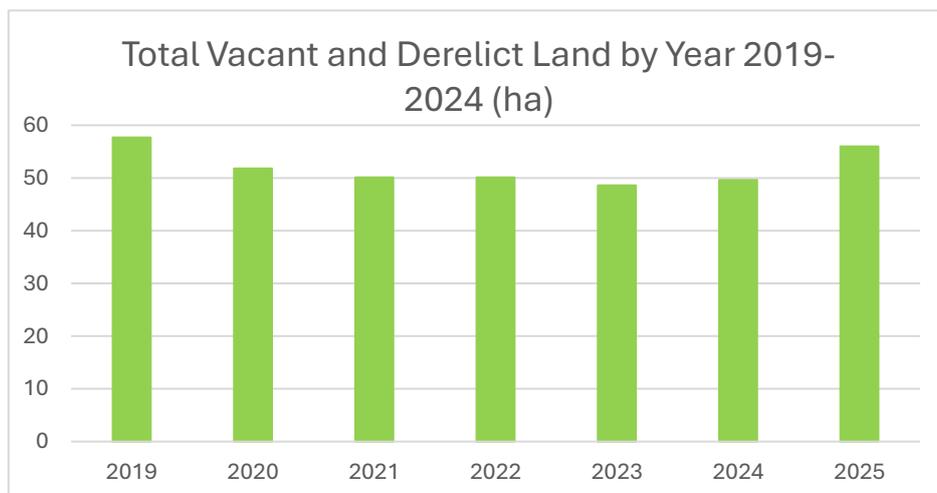


Figure 2: Total hectares of land classed as vacant and/or derelict in Argyll and Bute

A breakdown of sites included in the SVDLS returns can be found in figure 3. The table includes information on site ownership, and current planning history, if relevant.

Site Address	Administrative Area	Site Size (hectares)	Ownership	Current Planning History
27 Pilot Street, Dunoon	BAC	0.61	Private	N/A
Kilbride Road 1A, Dunoon	BAC	0.39	Unknown	N/A
3 Kilbride Road, Dunoon	BAC	0.39	Unknown	24/00604/MPLAN
90 Upper Laudervale, Dunoon	BAC	0.67	Unknown	N/A
17 Tom A Mhoid Road, Dunoon	BAC	0.46	Private	N/A
Argyll Street, Dunoon	BAC	1.03	Unknown	N/A
Meadows Road, Rothesay	BAC	0.66	Private	N/A
95 Academy Road, Rothesay	BAC	0.16	Unknown	N/A
97 St Brides Road, Rothesay	BAC	0.23	Unknown	24/00564/PP
12 Kyles Hydro, Port Bannatyne	BAC	4.77	Private	N/A
Rothesay Academy, Academy Road, Rothesay	BAC	1.56	Local Authority	N/A
Ardyne, Toward	BAC	27.86	Unknown	N/A
Polphail, Portavadie	BAC	1.3	Private	N/A
5 Craigendoran Street, Helensburgh	HAL	0.53	Private	N/A
Abercromby Street, Helensburgh	HAL	0.1	Unknown	N/A

9-20 Churchill Square, Helensburgh	HAL	0.15	Defence	N/A
Helensburgh Pier, Helensburgh	HAL	0.49	Local Authority	N/A
St Peter's Seminary, Cardross	HAL	0.23	Unknown	N/A
Low Askomil, Campbeltown	MAKI	2.03	Private	N/A
46 Milknowe Road. Campbeltown	MAKI	0.14	Private	N/A
105 Bengullion Road, Campbeltown	MAKI	0.11	Unknown	N/A
109 Tarbert Road, Campbeltown	MAKI	0.51	Unknown	N/A
Rhunahaorine, Tayinloan, Tarbert	MAKI	9.48	Unknown	N/A
The Rowans, Union Street, Lochgilphead	MAKI	0.11	Local Authority	N/A
Whitegates Road, Lochgilphead	MAKI	1.04	Local Authority	N/A
9 Glengallan Road, Oban	OLI	1.06	Unknown	N/A
Hospital, Oban	OLI	0.59	Unknown	N/A
Hospital, Oban	OLI	0.36	Unknown	N/A

Figure 3: List of sites included in Argyll and Bute SVDLS returns (2025)

Removal of sites from SVDLS

Figures from the past six years show the uptake of 11.59ha in total area that has been removed from the SVDLS in Argyll and Bute. This is spread across 21 sites. The largest site take up out of this figure is 1.96ha located in Campbeltown which has been partially converted to a flood protection scheme. Six sites that were in the 2024 statistics have been removed for 2025. These sites are:

Site Code	Administrative Area	Site Address	Site Size (hectares)	Removal reason
180	MAKI	Longrow, Campbeltown	0.28	Area used as storage and parking
2007/6b	MAKI	Kinloch Road, Campbeltown	0.28	
209	MAKI	Snipefield, Campbeltown	0.23	Area used for storage
130	BAC	Kilbride Road, Dunoon	0.52	Naturalised
130	BAC	Kilbride Road, Dunoon	0.55	Naturalised
2018/1	BAC	Watson Place	0.27	Naturalised

Figure 4: Sites removed from SVDLS returns (2025)

Upon site visits, minor amendments have been made to two sites in the existing SVDLS. Details of these can be found below.

Site Code	Administrative Area	Site Address	Site Size (hectares)	Reason for change
2023/2	HAL	Helensburgh Pier, Helensburgh	0.49	Recalculated area due to partial completion of works on site
2024/1	BAC	Rothesay Academy, Rothesay	1.56	Recalculated area due to partial completion of works on site

Figure 5: Sites with a potential change in site hectarage (2025)

The addition of one larger site in the 2025 calculations shows an increased figure in comparison to the 2024 data, though the implications are largely the same. There are still few sites to develop at significant scale, with much of the site more suited to small windfall developments for housing or business/industry use. The sites identified may also have additional constraints beyond those typically found on VDL. These may include access, flooding, or contaminated land requiring extensive remediation.

It is not anticipated that these sites will not make a significant contribution towards the local housing requirements. The two largest sites identified in the SVDLS returns would not be viable for housing developments, with both sites being situated outwith settlements and having known constraints limiting development potential.

Mapping of SVDLS in Argyll and Bute

Mapping of the SVDLS sites is provided to the Scottish Government during annual returns. These are not published online by the Planning Authority; however, these can be identified through the [Improvement Service's interactive map](#) of SVDLS across Scotland.

Buildings at Risk Register

Historic Environment Scotland publishes the Buildings at Risk Register; a list of buildings deemed at risk across Scotland. The buildings within the list are typically those located in conservation areas, are of listed status, or are of cultural or historical importance.

There are 187 buildings identified as being at risk across Argyll and Bute. 14 of the properties at risk are categorised as A-listed. A breakdown summary of the buildings at risk can be found below.

Category of Risk	Total number of buildings	Percentage
Low	51	27.27%
Moderate	56	29.95%
High	55	29.41%
Critical	24	12.83%
Minimal	1	0.53%

Figure 6: Category of Risk of buildings in Argyll and Bute

Condition of building	Total number of buildings	Percentage
Ruinous	56	29.45%
Very Poor	28	14.97%
Poor	59	31.55%
Fair	41	21.93%
Good	3	1.60%

Figure 7: Condition of buildings at risk in Argyll and Bute

Location of building at risk	Total number of buildings	Percentage
Helensburgh & Lomond	14	7.49%
Bute & Cowal	49	26.20%
Mid Argyll & Kintyre	86	45.99%
Oban, Lorn & the Isles	14	7.49%

Figure 8: Location of buildings at risk in Argyll and Bute by administrative area

Category of Listing	Total number of buildings	Percentage
Unlisted	74	39.57%
C	32	17.11%
B	67	35.83%
A	14	7.49%

Figure 9: Category of Listing of buildings at risk in Argyll and Bute

Six of the identified buildings at risk have “Restoration in Progress” status, highlighting the work being done to bring these buildings back up to an adequate standard, and where possible, into a functioning use. As of November 2025, these are:

- Stuart Town House, Rothesay
- Bakery, East Princes Street, Rothesay
- Dunans Bridge, Glendaruel
- House at rear of Rothesay Pavilion, Rothesay
- Keil Hotel, Southend
- Rothesay Pavilion, Rothesay

Work is particularly focused on Rothesay, through partnership working in both the [Bute BID](#) and [Rural Growth Deal \(RGD\)](#). One of the key projects in the RGD is the revitalisation of Rothesay Pavilion to create a top, cultural, tourist destination and modern community resource for residents and visitors to Bute. More details on this can be found in Topic Paper 15: Town Centres & Retail.

Scottish Biodiversity Strategy to 2045: Tackling the Nature Emergency in Scotland

The Scottish Government published the national biodiversity strategy to tackle the global climate emergency and nature emergency. The strategy recognises the threat these crises have on biodiversity in Scotland and sets out a clear ambition: for Scotland to be Nature Positive by 2030, and to have restored and regenerated biodiversity across the country by 2045.

There is no specific reference to the role vacant, derelict and brownfield land can play in achieving the Government's ambitions, however, the strategy emphasises the importance of restoration and regeneration of sites, including those classed as degraded. The strategy also aims to create nature networks, particularly in urban area, to reconnect fragmented habitats, avoiding insensitive re-developments and promoting restoration methods on vacant and derelict sites.

Overall, the strategy indirectly recognises the importance brownfield land can play in helping achieve the Scottish Government's ambitions to tackle the nature and climate crisis, through a number of different measures.

Update to the Climate Change Plan 2018-2032: Securing a Green Recovery on a Path to Net Zero

The document updates the 2018 Climate Change Plan that align with the ambitious targets to end the country's contribution to climate change by 2045. In the update, the Scottish Government commits to establishing a £50m vacant and derelict land investment programme. The Government understands that sustained investment is required to unlock vacant and derelict land for appropriate re-use with a focus on opportunities that support the built environment and tackle climate change. This investment is likely to be focused in deprived area across Scotland, where the blight of vacant and derelict land is most prevalent.

Open Mosaic Habitats High Value Guidance: When is Brownfield Land of 'High Environmental Value'

Policy 9 of NPF4 recognises the importance of the biodiversity value of brownfield sites. Brownfield sites have opportunities for nature recovery due to the natural progression to naturalised site status, and therefore, opportunities for productive greenspace are encouraged through national policy. For all development on brownfield land, the biodiversity value of the site should be considered.

A report by Wildlife and Countryside Link titled "Open Mosaic Habitats High Value Guidance: When is Brownfield Land of 'High Environmental Value'?" offers practical guidance on identifying brownfield sites with significant environmental and biodiversity importance. It explores the balance of redeveloping brownfield land for economic gain with conserving sites that serve as habitats for wildlife, as set out in NPF4.

Whilst the report sets out how redeveloping brownfield land can release pressure on greenfield sites and provide sustainable development opportunities; it is noted that some brownfield sites support vulnerable species and habitats.

The guidance outlines criteria for identifying brownfield land of high environmental value. A site may qualify if it:

- Contains priority habitats listed under the Natural Environment and Rural Communities Act 2006.
- Has nature conservation designations, such as Sites of Special Scientific Interest (SSSIs) or Local Wildlife Sites.
- Supports biodiversity, especially open mosaic habitats on previously developed land (OMHPDL), which are essential for species like rare invertebrates, plants, and reptiles.

Although only 6–8% of brownfield sites nationwide meet these criteria, protecting them is vital for biodiversity. The report argues that safeguarding these areas would not limit overall brownfield development but would prevent inappropriate development on ecologically important land.

Local Context

Housing Developments on Brownfield Land

Argyll and Bute Council hold a record of all houses developed on brownfield land above five units which is recorded in the annual [Housing Land Audit \(HLA\)](#) published by the planning authority. In the past 10 years (April 2015 – April 2025), there have been 12 developments on brownfield land, with 378 residential units created. Most of the sites identified in the HLA as brownfield land fall under windfall status. The majority of housing developments, and proposed housing developments within Argyll and Bute are developed on greenfield sites. Typically, greenfield sites have less constraints and are at a scale to accommodate strategic housing stock growth.

The Barriers to Housing Delivery

The briefing paper sets out how the Scottish Government’s housing policy, planning and strategy have failed to deliver the homes of all tenures needed to house the nation’s population. It states outcomes not achievable until the current Scottish housing crisis has been addressed. The document, published by Homes for Scotland, looks at several challenges that directly impact the delivery of new homes and sets out a number of opportunities that would arise from building 25,000 new homes across tenures each year. The document specifically references that around 4,500 homes can be delivered on vacant, derelict and brownfield land nationwide. The document provides further context with regards to barriers for housing delivery and the potential of the redevelopment of vacant and derelict land.

Empty Commercial Space

Since financial quarter 1 of 2025/2026 the Local Authority has started to track the number of vacant business properties across each administration area and the wider local authority area. As this is a new process, no comparative data exists. Over time the planning authority aims to work co-operatively with the council’s Empty Properties Officer to note the key trends and changes in the empty commercial space figure. However, due to externalities and macro-economic conditions, this is difficult to predict. In quarter 1 of 2025/2026, 276 vacant properties were identified across Argyll and Bute Council area (figure 10). This accounts for 3.37% of the total commercial properties in the council area.

This indicator is reported quarterly. The performance presented is at area level and Council-wide.						
Period	Area	Baseline	Actual	Variance	Status	FQ1 Commentary
2025/26 FQ1	A&B	277	276	-1	Green - Actual below Baseline	A&Bs 'empty' vacancy rate is 3.37% which represents an increase of 0.5%. Empty business property policy changes implemented by the council are positive and the market is responding to extended property relief and grant scheme. The role of town centres is multi-faceted so are impacted by many externalities. This is acute in rural economies facing challenges with depopulation, declining workforce, accessibility and macro-economic matters. Ongoing work is required to diagnose the issues currently affecting each of our town centres, and provide a framework of approaches/interventions to support their revival.
This indicator for FQ1 shows the cumulative number of empty properties is lower than the baseline.						
Actual trend line		Period	Actual	FQ4 Commentary		
		2024/25 FQ1	-			
		2024/25 FQ2	-			
		2024/25 FQ3	-			
		2024/25 FQ4	-			
		2025/26 FQ1	276			

Figure 10: Empty property indicator for Argyll and Bute in Quarter 1 2025/2026

In order to tackle the number of empty business properties, the Council has appointed an Empty Business Officer. As part of their role, they work with a number of stakeholders to deliver a framework to reduce the number of empty properties in rural towns, which are facing acute challenges with depopulation, declining workforce, accessibility, and macro-economic factors.

Empty Homes

The Scottish Government publishes [a record](#) of the number of empty properties in the country. This is broken down into each Local Authority Area for properties that are liable to pay council tax. The number of long-term properties in Argyll and Bute has significantly increased over the past year from 1329 in 2023 to 1888 in 2024. The number of long-term empty homes has also increased in this time period from 915 to 1236. Figure 11 provides the figures for both categories over a 10-year period. A decline immediately after covid has seen figures gradually increasing over time, with the trend of an increase both prevalent in medium and long-term empty homes.

Due to the inconsistencies of self-reporting properties, and that the data does not capture homes that are exempt from paying Council Tax, for example, short-term rental accommodation, some properties may have been missed from the reported figures.

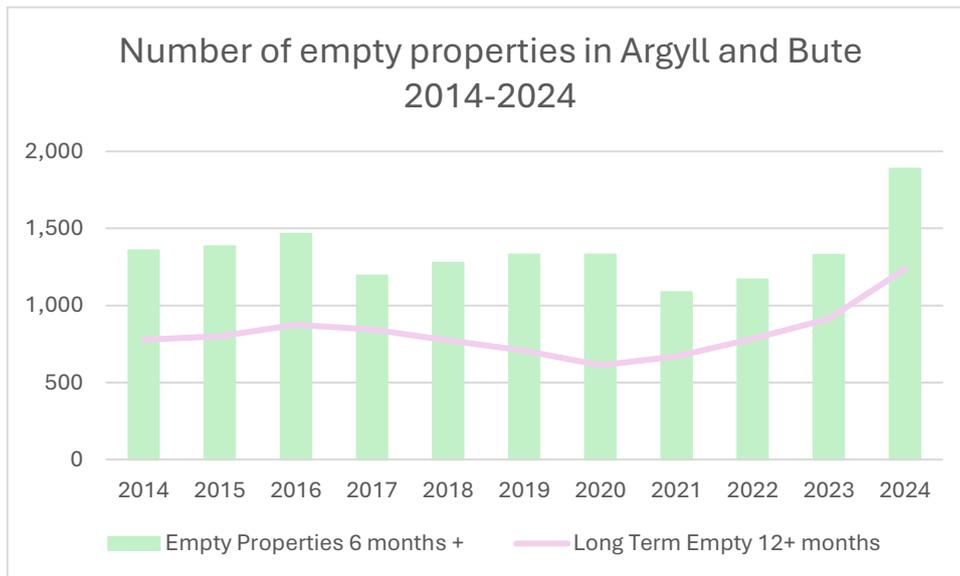


Figure 11: Number of empty residential properties in Argyll and Bute from 2014-2024

Urban Capacity Study (UCS)

The Scottish Government's Local Development Plan guidance states that authorities may wish to prepare a brownfield urban capacity study. As part of the work towards the Helensburgh and Oban Strategic Development Frameworks, Urban Capacity Studies have been completed.

Oban UCS

Ironside Farrar were appointed on behalf of Argyll and Bute Council to carry out the UCS for Oban which seeks to address the need for significant, sustainable growth in the area over a long-term period of up to 40 years. The study initially identified 82 sites for review within the following categories:

1. Vacant or undeveloped sites
2. Land repurposing/building conversions
3. Upper-level conversions/extensions

Each site was triaged on the physical attributes and delivery potential, with those not deemed suitable removed from the assessment. In total, 55 sites have been taken forward for further analysis. The report considers three potential scenarios, ranging from a conservative estimate of 65 residential units in scenario 1, to 1128 units in scenario 3: Ambitious. In order to deliver homes above the conservative assumption, this would require significant repurposing of industrial land and car parking. In addition, significant urban renewal and rationalisation of assets and infrastructure would be necessary to build at a capacity of the established minimum units (65).

Helensburgh UCS

Stantec were appointed on behalf of Argyll and Bute Council in 2025 to undertake an urban capacity study for Helensburgh and the surrounding areas as part of the wider Helensburgh Strategic Development Framework. The UCS considers the deliverability and potential development capacity of housing and employment land allocations, as well as vacant and derelict land within the settlements of Helensburgh and Cardross.

The UCS looked at the deliverability of six sites in Helensburgh and the surrounding area (two housing sites, one employment site, and three VDL sites). The UCS also considered one housing site and St Peter’s Seminary in Cardross. Figure 12 provides an overview of each site considered in the UCS, detailing their allocation status, indicative capacity and deliverability.

Settlement	Site	LDP2 Ref	Status (Allocated/ VDL)	LDP2 indicative capacity	Deliverability
Helensburgh	Helensburgh Golf Club	H2004	Allocated (Housing)	300 units (Housing)	Constrained

Helensburgh	Craigendoran	B2001	Allocated (Employment)	3.8ha (Employment)	Constrained
Helensburgh	Craigendoran Pier	N/A	VDL	0.5ha (Employment)	Constrained
Helensburgh	West Abercromby Street	N/A	VDL	1 unit (Housing)	Deliverable
Helensburgh	Churchill Square	N/A	VDL	10 units (Housing)	Deliverable
Blairvadach	Blairvadach	H2013	Allocated (Housing)	64 units (Housing)	Deliverable
Cardross	Kirkton Farm	H2002	Allocated (Housing)	118 units (Housing)	Deliverable
St Peter's Seminary	N/A	N/A	VDL	N/A	Constrained

Figure 12: Helensburgh UCS site summary table

The study shows that the larger scale sites within the Helensburgh settlement boundary are constrained to some degree, with the sites in Cardross and Blairvadach likely more deliverable in the short to medium term.

The report concluded by recommending that a proportion of greenbelt land should be considered for release to promote the anticipated housing growth in the area.

Community Regeneration Partnership

In Autumn 2024, the UK Government committed to delivering a package of support to Argyll and Bute Council to improve outcomes across the region in line with the Government's core mission and priorities. The Community Regeneration Partnership (CRP) will be a joint partnership between Argyll and Bute Council and the Ministry of Housing, Communities and Local Government, delivering up to £20m capital funding and £250k revenue. The package has yet to be finalised. However, if approved, the funding has identified opportunities to bring vacant and derelict land back into use in two key towns:

- Redevelopment of former Royal Hotel in Rothesay – the project will seek to address the dereliction of this grade B listed building in the town centre. Undertaken in a phase approach, Phase 1 will focus on external fabric repairs, internal structural works and fit out of the commercial space on the ground floor. Phase 2 will focus on a conversion of the upper floors for residential use.

- Dunoon public realm – funding to undertake public realm enhancements in Dunoon Town Centre. At present, there is a focus on 2 priority sites – Argyll Gardens and the fire damaged gap site on Argyll Street. This may result in the fire damaged site being redeveloped into a public square. There will also be funding to support local businesses with a focus on returning vacant units back into productive use and address high levels of vacant town centre properties.

Further information on other projects that the CRP will fund can be found in *Topic Paper 15: Town Centres & Retail* and *Topic Paper 17: Economy, Business and Industry*.

Contaminated Land

SEPA and Argyll and Bute Council keep a joint record of sites that may be affected by contaminated land due to previous uses in the planning authority area. No sites have been formally identified within Argyll and Bute.

Radon Gas

The UK Health Security Agency publishes a [national radon map](#) identifying areas where indoor radon concentrations may reach or exceed the UK Action Level. In these designated zones, compliance with relevant building regulations is required to mitigate potential health risks. Additionally, guidance recommends that the same protective measures be applied within a 50-metre buffer surrounding these zones, to account for uncertainties in geological boundaries.

Local Place Plans

Luining

Luining LPP references making contact with owners of vacant properties on developing these potential alternative uses. This is particularly important for housing on the island. The Luining LPP also recognises the importance of this dialogue from a historic asset's perspective, in order to maintain the condition of vacant properties, and upgrade to more environmentally sustainable standards.

Cove and Kilcreggan

No specific reference to vacant, derelict or brownfield land in the proposed LPP.

Ford (not yet validated)

No specific reference to vacant, derelict or brownfield land in the proposed LPP.

Gigha (not yet validated)

The LPP refers to four empty residential properties on the island, which is considered a higher percentage than a typical settlement of a similar size and population. This information is contained within the demographics section of the LPP and does not relate to any proposals for the island.

Helensburgh (not yet validated)

The draft local place plan identifies sites of opportunity around the town which includes underused and derelict sites. The Community Action Plan recommends that a project group could be formed to determine who owns underused sites or buildings; why they are in their current state; what, if any plans are there for development or redevelopment; and what legal or planning impediments may be in place

Helensburgh's draft LPP references two proposals on brownfield sites, the redevelopment of the waterfront area on the old leisure centre site and establishing a community sports centre and educational outdoor learning base at the old Hermitage Primary Annex. The proposals for the Helensburgh Pier site includes improving public realm, creating a permanent multi use skatepark, an open event space and a mixture of permanent and pop-up retail space.

The LPP also makes reference to derelict and empty buildings, including the establishment of a youth centre which could potentially be located in a redeveloped, existing, redundant building. The LPP makes specific reference to two properties which could host the youth centre. Empty properties in the town centre are not identified, however, the LPP addresses the need to maintain and enhance the town centre.

The wider aims of the LPP focus on the development of brownfield sites over greenfield development, prioritising affordable housing and smaller housing units on these sites.

APPENDICES

Appendix A: Oban Urban Capacity Study (to be attached once publicised)

Summary of Engagement

A working draft version of this template was shared with NatureScot and Homes for Scotland. Representations submitted at the working draft stage are summarised below:

NatureScot

General feedback provided on each section of the paper. Welcomed the links to other topics and suggested the inclusion of three documents into the paper. These are:

- Scottish Biodiversity Strategy
- Scottish Government Climate Change Plan Update
- Developing with Nature Guidance

NatureScot commented on the conclusion within the Helensburgh Urban Capacity Study that a proportion of greenbelt land should be considered for release to promote anticipated housing growth. NatureScot stressed that any releases must be informed by a green belt review, in line with LDP guidance.

Comment:

This paper has been updated to reflect the information set out in the above guidance and strategies, including the addition of the Scottish Biodiversity Strategy and Scottish Government Climate Change Plan Update as core documents. The planning authority remains committed to undertaking a green belt review in line with NatureScot's comments. Further information on this has been provided to NatureScot through Topic Paper 18: Green Belt. The Green Belt paper has also been added to the list of cross-cutting papers that the Council are preparing.

Homes For Scotland

Provided feedback stating that there was a lack of information to provide a robust consultation response. Comments received detailed that there was a lack of site information, ranging from site ownership, planning history, known constraints and funding mechanisms.

Recommended further links to evidence including:

- Homes for Scotland Briefing Paper: The Barriers to Housing Delivery
- Scottish Government Housing Land Audit Guidance
- Homes for Scotland Site Deliverability Checklist

Comment:

The Council welcomes feedback from Homes for Scotland. Reference to both the briefing paper and deliverability checklist have been added within the paper. The paper has also been amended to provide further site information on the SVDLS returns, though information around ownership is limited. It is acknowledged that the HLA guidance has been provided, though this has not been included within this particular topic. This sits within *Topic Paper 09 – Housing* along with the further detail on the LHLR and the HLA. The Helensburgh UCS has been provided as a key document to provide more context on this section. The Oban UCS is still in draft form, though is intended to be provided prior to the formal submission of the Evidence Report.

Summary of Implications for the Proposed Plan

Argyll and Bute has very limited vacant, derelict and brownfield site availability. Two of the sites identified in the SVDLS returns contribute to more than half the percentage of identified vacant, derelict or brownfield land but are not viable for large scale development. Many of the sites are small in site hectarage and will contribute to windfall figures where they are developed. Any sites that are brownfield and are identified for allocation will be subject to a deliverability assessment. Homes For Scotland's Site Deliverability Checklist can assist with site selection in this process. Whilst viable, brownfield development is encouraged, these developments are likely to have a limited effect on the planning authority's housing land requirements.

The proposed LDP3 should continue to support the re-development of brownfield sites, including those identified in the annual SVDLS. Sites identified within town centres can be used as an opportunity to support local living and the regeneration of existing settlements. The development of land in these areas would minimise carbon footprint, build on existing infrastructure and promote the sustainable use of infrastructure.

Policy 1 of LDP2 supports development proposals on brownfield land in settlement areas. Given the importance of minimising environmental impacts and conforming with the principles of local living and 20-minute neighbourhoods, the planning authority will review this alongside Policy 9 of NPF4 to ensure this importance is recognised in LDP3.

The Housing Land Audit shows that whilst there has been uptake of housing developments on brownfield sites, the anticipated scale of housing growth means that many of the sites will not be able to contribute a high number of housing units. Argyll and Bute recognises that there are limited sites which fall under the category of vacant or derelict that can support significant development. Many of the sites identified may be more appropriate for small scale housing or commercial developments.

LDP2 Policy 73 – Development Impact on Habitats, Species and Biodiversity provides the requirements for considering development proposals in locations that could potentially impact on sites with high ecological value. Further guidance on the protection of biodiversity could be given in LDP3 with regards to brownfield sites deemed as having high environmental value. If any are identified during the proposed plan process, then consideration could be given to protection as an Open Space Protection Area (OSPA). The proposal needs to be sustainable and consider the benefits of nature recovery over any potential redevelopment. The classification of high environmental value should be considered in the production of LDP3.

LDP3 will need to consider development density on all sites, including brownfield sites, relative to their location to support the principles of local living and minimise impact on biodiversity. Sites located in or around town centres will likely require a higher density, for example, a flatted development, to match the existing character and urban form of the surrounding area.

The planning authority will continue to identify brownfield land in settlement zones and assess their development potential for inclusion in LDP3.

LDP3 will support, where possible, the retrofitting of buildings in line with NatureScot guidance.

It is important through LDP3 that the council promotes the redevelopment of these sites and how these sites can be supported to make them more attractive for investment and redevelopment. It is accepted that brownfield sites tend to have more development constraints which increase the cost of a proposal.