RURAL ECONOMY AND CONNECTIVITY COMMITTEE

PROPOSED NATIONAL ISLANDS PLAN

SUBMISSION FROM ARGYLL AND BUTE COUNCIL

Whilst the council welcomes the opportunity to comment on the Proposed National Islands Plan the consultation period for comments on the Proposed Plan has been relatively short and there has been insufficient time for us to seek wider and more detailed views from our individual island communities. It is hoped that our island communities will have had sufficient time to respond directly to you on the proposed Plan.

The Council notes that the Proposed Plan has been informed through a previous engagement process with island communities and it was encouraged by the fact that consultation events took place on 10 of our 23 inhabited islands. Whilst the Plan provides general information on page 8 about the specific areas that were discussed in more depth it would be helpful if the plan was accompanied by a high level summary of the feedback from island communities (based on the individual reports from the events) and that this could then be tracked back to show how the responses informed the strategic objectives and more specifically the commitments contained in the Plan. This data and any future data/studies should be shared to assist stakeholders, including local authorities, in the development of any future plans/policy development.

In regard to the commitments it is noted that there are a total of 104 commitments and the challenge will be to ensure that these are firstly measurable and secondly deliverable within the 5yr timeframe of the Plan. The success of the Plan will obviously be measured on what change will actually be delivered to our island communities at the end of the 5yrs.

Specific Questions

Do you think the 13 Strategic Objectives in the proposed National Islands Plan are the right ones to meet the needs of island communities?

As previously advised we are pleased to see that the priorities set out in the Plan chime with those that have been highlighted by Argyll and Bute Council based on engagement with our communities. It is also noted that Education has been added as an objective. However there is still not a specific reference to training and skills as part of the Education strategic objective. This is unfortunate given our previous comments and the fact that we know that this is an issue of concern for our communities. The development of Skills and Training provision will be critical if we are to reverse the population decline and loss of young people faced by many of our islands.

Are there any issues which have been overlooked in the Strategic Objectives?

See comments above in regard to skills and training.
In addition it is disappointing not to see more reference to the third sector and to the important role that organisations such as island development trusts play in the delivery of sustainable economic growth on our island communities. Whilst there is mention in the text (primarily under objective 10) to the third sector and reference made to the excellent work being undertaken by organisations such as Mull and Iona Community Trust in delivering projects that will deliver economic regeneration, the importance of the role of these third sector community organisations and the need to provide support to them, does not come through strongly in any of the overarching strategic objectives nor does there seem to be any specific commitments relating to supporting such organisations. It is often the development trusts for the respective island community who are taking forward the delivery of the island development plan and associated action plan and projects. This can require a significant voluntary commitment and needs to be recognised and supported. Many of our island communities are very proactive and are the key drivers for change on their island – this is real community empowerment and support needs to be provided to ensure that this excellent work can continue and grow.

Sustainable Economic Growth

Argyll and Bute works with both Scottish Enterprise and HIE because the enterprise agency boundaries are not co-terminus with the local authority boundaries. This already creates challenges including the additional officer time needed for engagement with both agencies and the production/publication of information that is not representative of the whole area. The Council has asked Scottish Government ministers to simplify the arrangements in Argyll and Bute but this has not been delivered. The existing arrangements, if properly resourced would provide an efficient delivery mechanism.

In addition to the above point it is also felt that there could be more reference to the important role of the third sector in the Sustainable Economic Growth section as well as under objective 10 as per comments above.

Are there any Strategic Objectives that should be given a higher level of priority within the proposed Plan?

Transport, Digital priorities were highlighted in the consultation as being some of the highest priorities raised by island communities. It is still felt that the commitments in these area are very high level and not necessarily proportional to the strength of feeling reported through the consultation/Plan. It is however important to note that no one objective can be looked at in isolation and there needs to be links across all objectives and commitments. Across our 23 islands there are different experiences and challenges and this then influences where the focus/ issues are/should be in regard to the strategic objectives and the specific need of each island community which is unique.

Transport - There are a number of key concerns for our island communities relating to transport but ferries is the most frequently raised. It is noted that the commitments under this strategic objective makes specific reference to a new ferries plan however it does not include the existing outstanding commitments such as the freight review.
Recent studies suggest that car and commercial vehicle demand on ferry services to and from Islay (from both Scotch Whisky/Gin and the ‘Other’ sectors) are growing steadily and will need additional ferry capacity, if this growth is to be accommodated satisfactorily. Argyll and Bute Council are aware that the Scottish Ferries Plan is due to be refreshed imminently however, we would welcome discussions with Transport Scotland and key stakeholders regarding the requirement for additional vessels on this route including the potential for new freight ferry services. This is vital if we are to futureproof the ferry network to accommodate future growth in the whisky, gin and tourism markets which are essential to both the local economy and also the wider Scottish economy.

The historical evolution of ferries has resulted in some ferries being subsidised and provided by local authorities. Argyll and Bute Council have subsidised ferry services to Jura, Luing, Lismore and Easdale and the costs associated with operating these services ultimately affects the other services the Council can deliver across Argyll and Bute within budget. This is especially significant during the current financial climate where many services are subject to reduction.

Argyll and Bute Council has previously stated to the Scottish Government that given the importance of lifeline services to our communities and the associated costs of providing this non-core service, it is inappropriate for the Council to have the responsibility for the provision of any ferry services which operate to island/peninsular communities located within the Argyll and Bute. It is therefore the preferred position of Argyll and Bute Council not to operate any ferry services. The Scottish Government is best placed to provide a consistent delivery to ferry provision. This approach would allow an overarching service standard and offer economies of scale.

The suitability of islands roads is also an area of focus for island communities. Current local authority funding allocations for roads maintenance reflect the number of vehicles licenced as well as road length. The allocation to areas within Argyll and Bute follows a similar methodology. Considering the low numbers of vehicles on islands any significant change required as a result of island proofing or service equality is likely to require a fundamental review of local government funding which has not proven straightforward to deliver in the past.

Haulage demands can place pressure on fragile local transport networks and, as such, Argyll and Bute Council have been working with key stakeholders to promote innovative solutions. For example timber in certain rural areas is now shipped directly from floating pontoons or using landing craft to avoid high frequency haulage operations on fragile local road networks and in addition the Scottish Government continue to support the Timberlink project where timber is shipped from Ardrishaig, Campbeltown and Sandbank resulting in approximately 8,000 less lorry journeys (roughly 1,000,000 less miles) on busy local roads on the west coast of Scotland. The Council supported by ERDF funding have also invested £12m upgrading road access, berthing and quay facilities in Campbeltown to support Kintyre’s renewables industry. These projects are an example of where public sector funding can be used to enable freight to be transported sustainably helping to
support local industry and jobs whilst limiting negative impacts of commercial transport on fragile island infrastructure which is essential to local communities.

The Council had significant transport asks, initially contained in Rural Growth Deal (RGD) proposition document totalling £64m. Scottish Government officials have advised that these asks should be progressed via the Strategic Transport Projects Review (STPR) 2 process which is currently being progressed by Transport Scotland. A number of the RGD transport asks related to local trunk road upgrades and investment in local air services, all of which will benefit our island communities by improving direct access to islands and access to local ferry terminals and transport hubs. As such, it is essential that the next STPR recognises our rural transport challenges both on our islands and those that are on our mainland and link to the key service centres for our islands. Significant funding for transport infrastructure requires to be committed to the region in light of this.

The reduction in local authority transport budgets is constraining our ability as a local authority to provide lifeline transport services to our island communities, e.g. recent reduction in our air services. Services funded by Transport Scotland have not been subject to the same level of cuts and this creates inequalities between services to certain islands / rural communities. RET and the growth in tourism has resulted in capacity issues on certain ferry services and impacts fragile local infrastructure on some of our islands. Additional funding is required from the Scottish Government to futureproof local infrastructure and accommodate the predicted growth in tourism.

Support needs to be provided to deliver on a more sustainable approach to the movement of freight particularly in light of the climate emergency and sustainable travel hierarchy set out in the draft NTS2.

In addition to the Scottish Ferries Review a similar exercise should be undertaken in regard to lifeline air services to and from our islands in the form of a Scottish Air Services Review. This should be a commitment in the proposed island Plan. Air services across rural Scotland to and from our islands are all continually being operated in small pockets in isolations from each other. Argyll and Bute Council, Orkney Council, Shetland Council, Comhairle nan Eilean Siar and Transport Scotland all have responsibility for subsidising air services and airports. A more joined up approach could offer many savings with better opportunities to stimulate competition and offer linkages not currently being met and ensure no islands are left behind.

Oban airport can easily accommodate the Scottish Governments newly purchased Twin Otter aircraft that are utilised on the Scottish Governments routes from Barra/Tiree connecting to Glasgow. These flights all fly over Oban at present without connecting and this is seen as a missed opportunity.

This approach seems to be at odds with the current NTS vision. As these routes are at capacity this demonstrated the significant demand that exists to develop and support further new routes. This is a further reason why there needs to be a national Scottish Air Services Review, similar to the Scottish Ferries Review and likewise with the Scottish Ferries Review when additional ferries are procured, additional aircraft
should also be procured when capacity constraints are identified on the national network. This would be at a competitive price when comparing investment in new aircraft to the investment in a new ferry.

Digital

The commitment in relation to digital connectivity asks only that island communities are “considered” in the development of telecoms regulations. Given the importance of this issue we would seek a more positive and delivery focussed commitment. Given the emerging findings of the Infrastructure Commission in relation to this issues, the failures to date and the role this issue has in tackling depopulation we feel that there should be an explicit link to the work being undertaken by the Commission and a firmer commitment.

Do you think the proposed Plan sets out both a clear strategic direction and practical approaches to delivery of the Strategic Objectives?

There are a total of 13 Strategic Objectives and 104 commitments contained in the Plan. The delivery of any of these seem predicated on the successful delivery of separate Plans, policies and initiatives and wider investment programmes some of which relate to matters that are not devolved and rely on agreement from UK Govt and bodies such as Ofcom. There is also a mix match between the level at which different decisions/plans/policies will be made and how influential island communities can be in these policy making processes. This will make the Implementation of the Plan very challenging and especially difficult to deliver. The successful Plan delivery would appear to be reliant on the Implementation Strategy which has not yet been developed or approved. Reference is made in the text to the fact that local authorities will have a key role to play in this. It is understood that local authorities with a responsibility for islands will be requested to engage in the development of the implementation plan. There is no clarity on the resource implication of this to the respective local authorities. Without the necessary resources being made available it will not be deliverable.

We would agree that Scottish Government is not able to deliver the commitments alone. It is surprising however that local authorities receive particular focus in terms of the development of the implementation plan. While local authorities undoubtedly have a role to play, many of the commitments are led by other agencies. For example economic development is the primary role of Highlands and Islands Enterprise (HIE) but only a non-statutory power for councils. The reference to “other stakeholders” does not accurately describe bodies such as HIE, they and others are agencies of Scottish Government and key to the delivery of the Plan.

This approach of developing strategic objectives and then commitments which will be supported by an implementation plan, carries with it the danger that this multi-layered plan approach may become confusing when referring to these various documents but the more important issue is the high expectations that the strategic and broad commitments will create in the eyes of our communities. This is of particular concern during the period in which the Implementation Plan is developed when clarity on the actions, the timeframes and resourcing is unclear. We would suggest that future iterations incorporate SMART actions and implementation details within a single Plan.
The delivery of the 104 commitments over a 5 year period will clearly bring with it an increased expectation and it is critical that the Scottish Government identify the appropriate resources, both people and funding, to support the delivery if it is to deliver real positive change to our island communities. It is unclear if any budget has been allocated to the delivery of the Plan or the Implementation Strategy.

Do you think the proposed Plan adheres effectively to its stated principles that it is “fair, integrated, green and inclusive”? If not, how might its adherence to any or all of these principles be improved?

The Plan refers to equality of service as well as opportunity and we feel that clarity on what is meant by this is needed. Equality of service implies that services should be available on the islands themselves. This issues links back to the need to ensure that the focus is clearly and transparently on all our Scottish islands not just the island authorities. Our 23 islands vary dramatically in size and population and the implications of delivering equal services to the 11 residents on Ulva and the 3,000 residents on Islay when compared to our mainland residents could have significant cost implications for Scottish Government, NHS and affected public bodies. If the inference is to provide this level of services on all of the islands then there would clearly need to be the necessary funding allocated to deliver this.

A number of the commitments use language such as “promote” and “support”. Our view is that this use of language needs careful consideration when read in conjunction with the consultation reports. For example the health and wellbeing section includes a commitment to “Support relevant local authorities to plan and develop sports facilities on the island that respond to the needs of the communities, This would appear to be a commitment to provide sports facilities yet the word support does not confirm if this would be in the form of funding and also how is the “needs of the community” would be defined.

The Islands (Scotland) Act 2018 sets out longer term timescales for Scottish Ministers to report on and review the Plan. Does the proposed Plan have sufficiently clear targets and measurable indicators by which to measure its performance?

There is a mixture of language used within the commitments laid out in the Plan including “support, promote, mandate, build on, look to, work with”. These imply varying levels of commitment and actions and some are clearer than others in terms of what the expected outcome would be. There is a strong possibility that there will be confusion caused as a result of the language used and that it will therefore be difficult to measure success, or what individuals would interpret as success, given the potential for confusion. In the implementation strategy it is really important that any confusion is removed and there is clarity on the actions and resourcing is clear. We would suggest that future iterations incorporate SMART actions and implementation details within a single Plan.

It is understood that local authorities with a responsibility for islands will be requested to engage in the development of the implementation plan (ref to Partnership group). It is hoped that any representation is reflective of all island authorities. There is no clarity on the resource implication of this to the respective local authorities and this would need to be addressed.
Does the proposed Plan align with the Scottish Government’s renewed focus on climate change issues, following its announcement of a climate change emergency? There is the need to ensure that climate change is a thread that runs through each of the objectives and is reflected strongly through the commitments and that the necessary resources are attached to it. Issues around sustainable transport including movement of freight need to be addressed. Fuel poverty is a real issue and whilst greener energy could provide opportunities for more affordable energy and could assist in delivering reduced heating bills this is only achievable if there is the necessary funding support provided to allow the switch to be made. Grid capacity is a real issue for many of our islands and this can really constrain their ability to develop and deliver renewable energy projects and secure cheaper and greener energy and generate income. Innovative approaches are key to successful delivery however this will often involve issues that are not devolved such as Grid and there is also the need for the necessary funding to be provided. Cost of delivering innovative solutions are often more expensive on our islands.

Does the proposed Plan deliver against the Scottish Government’s own National Performance Framework, and the underpinning Sustainable Development Goals?

It is assumed that as the Plan has been developed by the Scottish Government that it has been sensed checked against the NPF and SD goals however from the council’s perspective all the issues identified by the council in their response would need to be addressed if the Plan is to deliver on the National Performance Framework, and the underpinning Sustainable Development Goals.