RURAL ECONOMY AND CONNECTIVITY COMMITTEE

PROPOSED NATIONAL ISLANDS PLAN

SUBMISSION FROM COMHAIRLE NAN EILEAN SIAR

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

- The strategic objectives are generally correct, clear and expressed concisely.
- However, not all of the strategic objectives are of equal value in respect of ensuring a sustainable future for island communities and it is important that this is reflected in future implementation approaches.
- It might be useful to bring together Strategic Objectives 8 & 9, noting the crossover between environmental wellbeing and climate change.
- The strategic objectives under the Arts, Culture and Language and Education themes could be refined so that they are more specific to the island context.
- The Plan would benefit at the outset from a vision statement or similar that sets out what it intends to achieve in terms of the impact and outcomes for Island communities.

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

- It is clear that there has been significant consultation undertaken during the formulation of the Plan, and that this has been reflected in the document. The strategic objectives are comprehensive and no issues appear to have been overlooked.
- The inclusion of additional objectives, beyond those required by the Act, but highlighted in the consultation, such as arts & culture, is welcome.

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

- Not all of the Strategic Objectives are of equal value although the balance of this depends on setting out the outcomes that the Islands Plan wishes to achieve.
- Population levels and sustainable economic development are the key objectives, with the others contributing towards achieving these. It would be beneficial to show these interdependencies.

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

- There are no overarching targets as to what the Plan intends to achieve
- We recognise the acknowledgement that quantitative and qualitative measures are yet to be developed and will be in the form of an Implementation Strategy.
- The commitments in the Plan will need dedicated funding and delivery support.
- There is no detail on the practical delivery of the commitments of the Plan or the respective roles and responsibilities envisaged for this, including the
involvement of island stakeholders in shaping this process and being involved in direct delivery.

Do you have any comments on the actions outlined to support effective implementation of the proposed Plan?

- There are over 100 ‘commitments’ in the Plan and a lot of work will be required to turn these into tangible, measurable actions.
- Many of the ‘commitments’ are business as usual or are too high level. While we welcome an increased focus on island issues within this context, it must be recognised that drastic action is required in some of our communities. P16 makes reference, for example, to small scale pilots around population. It is hoped that in the Implementation Plan there will be clarity on what this means, and the allocation of additional resources to innovative approaches / packages / measures on population attraction and retention.

In relation to specific objectives, we would wish to make the following comments:

- **Strategic Objective 1: Population**
  There is scope to considerably strengthen and increase the detail of the commitments being made here. A number of the commitments point towards more research and consultation rather than action, but presumably there is a plethora of useful action points that have been gained through the Islands Plan consultation and other work done in this area. For example, HIE have already done significant work around talent attraction and attitudes of young people in rural areas.

- **Strategic Objective 2: Sustainable Economic Development**
  Local authorities have a key role in delivery of Economic Development but this is not reflected in the commitments, which largely references the role of HIE and SDS. In respect of Regional Economic Partnerships there should be flexibility to ensure that local governance and service delivery models best suit island circumstances. There is arguably too much of a focus in the commitments on growth of existing sectors, such as food and drink, agriculture and tourism, with little mention on opportunities around energy, innovation and other sectors in order to have a variety of opportunities and increased value / diversification within the employment market. As referenced in the work on an Islands Growth Deal, with the right digital enablement, islands can offer ‘living-labs’ and test beds for development and trialling of new products and services to address a range of challenges in society. The Plan makes no reference to future regional policy post-Brexit. Islands have benefited significantly from EU funding in the past. It is critical that future regional policy reflects and impacts on island challenges and priorities, and is adequately resourced to do so.

- **Strategic Objective 3: Transport**
  The direction of the narrative is not reflected in the commitments, where the focus appears to be primarily on ferries. There is nothing in the commitments on connectivity within islands, for example around roads infrastructure or the promotion of low carbon travel in island communities and the benefits possible as a result of access to renewable sources of fuel. These are perhaps implicit in the reference to the NTS Delivery Plan. No commitment evident around air
travel, which is critical to the islands, although ADS and lifeline services referenced in the body of the text. Importance of transport links as an integrated strategy for population attraction /filling vacancies.

- **Strategic Objectives 4 & 5: Housing & Fuel Poverty**
  The Plan recognises that Scottish Government approaches to assessing housing need and demand don’t always reflect on the ground reality in island communities and the challenges of construction in an island context (cost, etc). For these reasons, flexibility in Scottish Government housing funding to respond to local circumstances and opportunities is critical. Integration of fuel poverty with housing is welcomed. However, in doing so the multi-faceted nature of causes of fuel poverty are overlooked in the strategic objectives and it would be helpful to have a commitment in relation to energy costs. At present the focus is solely on energy efficiency while high energy costs are a significant contributory factor in fuel poverty for island residents and businesses. In relation to the operation of the Croft House Grant Scheme, it would be beneficial to have a stronger commitment here than simply a continuation of the existing scheme, and greater acknowledgement of the importance of finding mechanisms to support housing within crofting tenure. This should include an examination of whether the impact of the scheme could be enhanced, for example through increased levels of financial intervention.

- **Strategic Outcome 6 – Digital Connectivity**
  The Islands Plan usefully recognises the centrality of digital and mobile connectivity to achieving other aspirations within the Islands Plan and addressing distinct island challenges around service delivery, etc. We also agree that it is important that access to digital is fair and inclusive. In this context, infrastructure is of primary importance and should be the focus of the commitments in the Islands Plan rather than digital skills, for which there are already a range of national programmes in place.

- **Strategic Outcome 7 – Health and Social Care and Wellbeing**
  This section would benefit from more of a recognition of the challenges of delivering health and social care services in the islands, particularly in the context of an ageing population and the drive to support people to stay in their own homes for longer. The financial pressures on delivering health and social care services in rural areas, and the challenges in recruiting and retaining staff need to be recognised. There is scope for crossover here in regard to commitments around population. The commitments vary from being very vague and all-encompassing to being far too specific (e.g. a specific commitment around the Orkney Island Games).

- **Strategic Outcome 8 – Climate Change & Energy**
  The waste management and circular economy considerations unique to islands are worthy of greater reference and a specific commitment. Waste management in Scotland’s islands is more complex than mainland communities. The sparsity of population and the road (and ferry) miles between different areas are just some of the factors that mean that collection costs are higher. Island communities have historically needed to develop unique and innovative solutions to deal with waste. It is important that this flexibility
continues and it is hoped this can be facilitated and enhanced through the island-proofing process and support for circular economy projects in the islands. The current work being undertaken by Zero Waste Scotland in respect of island-proofing the design of Scotland’s Deposit Return Scheme has to date provided an exemplar approach to Island Proofing.

- **Strategic Outcome 9 – Environmental Wellbeing and Biosecurity**
  Climate change and energy are worthy of a higher profile within the Plan. Balance is critical in respect to environmental designations in order to ensure that they do not act as an impediment to economic development.

- **Strategic Outcome 10 – Empowered Local Communities and Strong Local Partnerships**
  The National Islands Plan could more strongly emphasise the centrality of the Review of Local Governance as a mechanism by which new models for public service delivery and local governance in islands will be explored and implemented. The potential role of Single Island Partnerships / Single Island Authority models are not referenced and should be part of devolution of decision making and greater control of local resources to island level. Comhairle nan Eilean Siar is prioritising the development of these new governance models that will seek to increase community influence within the decision-making processes of all public bodies and governments, and see increased devolution of powers and functions to local communities, where desired. Transient Visitor Levy Bill is still being consulted on, so it should not be assumed that all island areas will be supportive of this or what the eventual form would be, which is what is suggested within the commitment.

- **Strategic Outcome 11 – Arts, Culture and Language**
  The recognition of Gaelic in the narrative and the commitments are welcomed, however the Plan could be more robust in its support for Gaelic language and culture. It is notable that there is no reference to Bòrd na Gàidhlig in the plan despite its role as the key statutory body leading on Gaelic language development. A specific commitment seeking to strengthen Bord na Gàidhlig’s presence in island communities would be welcomed here. Reference to food tourism does not fit particularly well in this section, while broader reference to our archaeological and heritage assets in relation to tourism would seem to fit better. Food Tourism would be better referenced under strategic objective 2.

- **Strategic Objective 12 – Education**
  Reference to the opportunities that digital can bring in respect of meeting the commitments in the National Islands Plan would be beneficial here. The role of digital in widening choice and increasing access to a range of subject choices on island communities should be referenced. An excellent example of this is Comhairle nan Eilean Siar’s eSgoil initiative which would be a useful case study. The Plan should reference that higher education establishments other than UHI are working in Scotland’s islands, and that this breadth of academic involvement in our islands is something to be encouraged and developed further.
• Strategic Objective 13 – Implementation and Measurement of the National Islands Plan

Implementation does not sit well as a strategic objective in its own right but underpins the success of the plan as a whole.

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?

• These principles do come out in reading through the Islands Plan. To achieve this in practice, these principles will need to underpin the actions within the Implementation Plan. The Plan is strong on the need for fair access to services by island residents and hopefully the Island Impact Assessment process offers an opportunity for these principles to be embedded in policy and service delivery.

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?

• As detailed on P59, the Plan at present does not contain any targets or indicators and this work is ongoing. Given that the Plan as it stands has 104 commitments within the 13 strategic objectives, there will need to be a level of prioritisation in consultation with key stakeholders, otherwise there is a danger of dilution of resources and focus. There is scope to refine and strengthen some of the commitments in the Plan as presented.
• More about the role of local partners, including local authorities, in delivering the plan will be required at the next stage. It will be critical for other delivery partners, for example, HIE to respond to the specific needs of island communities.
• The proposed National Islands Governance Group should have significant islands representation at political and officer level.

Does the proposed Plan align with the Scottish Government’s renewed focus on climate change issues, following its announcement of a climate change emergency?

• The Islands Plan highlights how Scotland’s islands are already leading the way in supporting Scotland and UK Government to tackle climate change. Harnessing of our renewable resources, and export of these to UK mainland grid is a central part of this and will support our islands to achieve a number of other objectives around economy and depopulation. Unleashing the potential of our renewable energy resources as outlined in the commitment on P.46 is not given the prominence that it should.

Does the proposed Plan deliver against the Scottish Government’s own National Performance Framework, and the underpinning Sustainable Development Goals?
It will not be possible to comment on this until there is an Implementation Plan in place. However, it is important to realise that a tailored set of indicators may be required, including local data gathering, in order to address limitations in national statistics when being applied and analysed for Scotland’s islands of communities of place / interest within the islands. For example, the indicators in the National Performance Framework are based on sources such as the Scottish Household Survey (SHS), which may not allow the level of detail to see impact and change at a local level. It will be important therefore that this is supplemented by other means of assessing quantitative and qualitative change and the costs / implications of doing this properly should be understood at an early stage in the development of the Implementation Plan.