RURAL ECONOMY AND CONNECTIVITY COMMITTEE

PROPOSED NATIONAL ISLANDS PLAN

SUBMISSION FROM ORKNEY ISLANDS COUNCIL

The Council welcomes the opportunity to respond to the Committee’s call for views on the National Islands Plan for improving the outcomes of island communities across Scotland. The Council’s response to each question is as follows:

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

Yes.

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

The Council considers that the National Islands Plan should also address the following issues:

- **Political Commitments**

The Council considers that the National Islands Plan should monitor the outcomes of relevant existing political commitments. This would include commitments made in the Scottish government’s Empowering Island Communities Prospectus. Examples are: the distribution of net revenue from Crown Estate marine assets out to 12 nautical miles; and the principle of fair-funding in the provision of ferries and ferry infrastructure.

- **Local Governance and Empowerment**

There is scope for relevant legislation pertaining to local governance and empowerment to be monitored within the National Islands Plan. For example, the Council responded to the Scottish government’s consultation on the Local Governance Review. The Scottish government recently published its report summarising the main themes emerging from the consultation. The report acknowledges many of the priorities put forward by Orkney Islands Council: Single Authority Model; empowerment of community councils; fiscal autonomy/greater flexibility; the principles of the European Charter of Local Self Governance are recognised in law; and that a Power of General Competence is also enacted.

In particular, the National Islands Plan should emphasise more the importance 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 Government’s Programme for Scotland 2017-18, A Nation With Ambition, makes a commitment at P109 in respect of a Single Authority Model. This is a key
commitment which the Council is endeavouring to drive forward despite Scottish government resistance and should be monitored in the National Islands Plan.

The National Islands Plan should also have an important role in tracking the progress and implementation of relevant statutory provisions in the Islands (Scotland) Act 2018 and the Scottish Crown Estate Act 2019.

- **Shared Prosperity Fund**

  The effectiveness of the Shared Prosperity Fund and how well it replaces EU funding streams should be monitored within the National Islands Plan. It is a concern that the proposed Shared Prosperity Fund may be used to fund commitments within the Plan rather than “new money”.

- **International Engagement and Opportunities**

  The Council considers that the National Islands Plan should be outward looking and acknowledge international engagement and opportunities for islands. This should be a strategic objective. For example, the Council has been actively engaged in the Scottish government’s Arctic Policy Framework for Scotland.

- **Implementation Strategy**

  The Council expected an Implementation Strategy within the Plan with deliverable outcomes, realistic time limits, measurements of success and associated funding proposals.

- **Sustainable Economic Development**

  At page 17, the Council considers it would be useful, when referring to developing the blue economy, to refer to the importance of Marine Planning Partnerships as a mechanism to drive forward sustainable growth while also demonstrating subsidiarity. Marine Planning Partnerships can play a key role in delivering this strategic objective.

- **Housing and Fuel Poverty**

  At page 31, statistics are given for fuel poverty in Shetland and Na h-Eileanan Siar. The Council considers that Orkney should also be highlighted as it has the highest level of fuel poverty in Scotland; a key component of this is the low energy efficiency of much of Orkney’s existing housing stock with additional challenges such as being out with the gas grid.

3. **Are there any Strategic Objectives that should have been given a higher level of priority within the Proposed Plan?**

   The Council considers that all the strategic objectives are of equal importance and priority as they inherently overlap with one another. For example, the provision of
long term, sustainable and affordable solutions to inter-island and Orkney-Scottish Mainland connections for business, freight, health, commuting social and education trips is one of the highest priorities for the Council. This Council priority encompasses many of the strategic objectives within the proposed Plan.

The Council considers that the National Islands Plan should have individual sections for each relevant local authority area in order to fully recognise the distinctiveness of the islands within each area. The Orkney archipelago is not linear, unlike the basic geographical structure of both Shetland and Na h-Eileanan Siar, with a cluster of islands centred around the Orkney mainland. This can result in triple insularity for some island residents. For example: any business on the island of Papa Westray wishing to trade with the Scottish mainland, must first transport goods to the island of Westray, then to the Orkney mainland, before a final onward journey to the Scottish Mainland, incurring the additional costs associated with three boat journeys. An islands authority area-based approach would help focus funding commitments for island communities having regard to the priorities espoused within the extensive consultation.

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

There is a lack of clarity in the strategic direction of the Plan as there are no defined outcomes, targets, timescales or measurements of success. The Council acknowledges that the intention is that the proposed Implementation Strategy should address this.

More detail is required on the practical delivery of the commitments in the Plan and the respective roles and responsibilities envisaged, including the involvement of island stakeholders in shaping the process and being involved in direct delivery. The Council considers that the Islands Strategic Group will provide a useful sounding board in the delivery approach.

As indicated in the response to question 5, there are many problems with the definition etc of commitments. If a commitment is not clear, then it serves no useful purpose. Commitments require to be SMART.

5. **Do you have any comments on the actions outlined to support effective implementation of the proposed plan?**

The commitments in the Plan are extensive but with no clear definition of how they will be achieved, whether through resources or funding. It is not obvious whether certain commitments are island wide or specific to certain islands. Some commitments relate to what will be a statutory duty anyway. For example: *ensure that existing and future transport related policies, strategies and services are fully island proofed...*”. While reassuring, does it really need said? Many commitments are “woolly” and not SMART, which will make it difficult to determine whether an outcome has been achieved. For example: “work with HIE and UHI and other internal and external stakeholders to ensure the needs of islands are met...” It can also be said that this is happening anyway. There requires to be further thought
given to strengthening some of the commitments and, indeed, whether some are necessary at all.

For the Implementation Strategy to have credibility, concerted action plans are necessary for each local authority area. The action plans will require equitable funding to support planned outcomes developed by Scottish government, Community Planning Partnerships, islands authorities and communities. In particular, there requires to be “quick wins” in order to instil immediate confidence in the process. Further detail is required on the role of local partners, including islands authorities, in delivering the Implementation Strategy.

In conclusion, there is a lack of focus in the commitments and it is not clear how they have been informed through the consultation. In particular, there is no substantive definition of what the priorities are for each island authority area and how to specifically address these in the short, medium or long term. It is suggested that the stated aim for publication of the Implementation Strategy in Spring 2020 may be ambitious.

6. 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?

Yes. However, there are no clear performance measurements specified to monitor adherence to the principles.
The Council has promoted, through the Our Islands Our Future campaign, the principle that Insularity and Remoteness should be considered an Equality Issue. The government’s proposal to develop a new statutory human rights framework within the plan is to be commended. However, there is a lack of detail as to how and when this will be done. In the absence of the human rights statutory framework, there will require to be a tangible means to measure fairness. In particular, the level of funding for commitments in each island authority area will require to be considered. There is no explanation of how this will be achieved. The absence of clarity will inherently undermine confidence in the Plan. The Council notes the commitment in the National Performance Framework that “every member of society has a right to live with dignity and to enjoy high quality public services wherever they live”. How will this be measured?

7. 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 indicated, the proposed Plan does not contain any targets or measurable indicators. Much work will be required to address this. Prioritisation will be required in respect of the 104 commitments within the strategic objectives. There will need to be a level of prioritisation in consultation with key stakeholders to develop action plans for each island authority area.
8. **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 Council has joined organizations around the world in declaring a climate emergency. The Council seeks to continue to support the pioneering renewables scene in Orkney – whether that is tidal, wave, wind, hydrogen or biofuels. This includes pushing for an improved electricity grid connection from Orkney to mainland Scotland. Unleashing the potential of renewable energy resources as outlined in the commitment on P.46 should have greater prominence and definition.

9. **Does the proposed Plan deliver against the Scottish government’s own National Performance Framework, and the underpinning sustainable Development Goals?**

It is impossible to comment on this until an Implementation Strategy (with local authority area action plans) is in place. Further indicators may be required in order to address limitations in national statistics when being applied and analysed for specific islands communities within the Orkney archipelago. For example, the indicators in the National Performance Framework are based on sources such as the Scottish Household Survey (SHS), which may not be sufficient to determine the level of impact and change at a specific local level. It will be important therefore that existing indicators are supplemented in order to assess quantitative and qualitative change. The potential costs and implications of supplementing existing indicators must be recognised in the development of the Implementation Strategy.

Where new data is considered necessary for better indicators, it will be important to avoid burdening local authorities or others with new requirements for data gathering or reporting.