RURAL ECONOMY AND CONNECTIVITY COMMITTEE

PROPOSED NATIONAL ISLANDS PLAN

SUBMISSION FROM ZETTRANS

**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 have merit and are comprehensive (although arguably Implementation of the plan should not be classed as a strategic objective). It is important to recognise the differences between and within the island groups and that some strategic objectives will have more relevance to some islands than others.

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

You would expect a document at this kind to be called an Islands Strategy (given that it identifies and develops strategic objectives), to be implemented through an Islands (Action) Plan, rather than calling it an Islands Plan to be delivered through an Implementation Strategy (see p.7). The Implementation Strategy will need to be fully costed and resourced – detail that is missing within the NIP.

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

Some strategic objectives underpin others and this needs to be acknowledged. Connectivity is a critical factor in meeting other strategic objectives (e.g. population levels, sustainable economic development, health, social care and wellbeing). **Both digital connectivity and transport should be prioritised.** The table on p.8 demonstrates the importance of transport to island residents, given that it is the things consultees spoke about the most times.

It is not clear what is meant by prioritising in practice but it would need to be commitment of funding and resources to the achievement of these objectives – for example full and fair funding of Shetland’s inter-island ferries.

The strategic objectives cannot all be seen in the same way. Some of the strategic objectives relate to challenges that are quite specific to island (and some rural mainland) communities – for example depopulation, and sustainable economic development - whereas some of the strategic objectives would apply more broadly across the piste in Scotland – e.g. climate change & energy or education.

Some of the issues affect some islands more than others, which also needs to be recognised. The three island groups are very different from each other, and there is also great variance between the islands within each of the groups in terms of natural, social and economic capital.

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

The strategic direction is clear but there are **some significant gaps in the narratives for several of the strategic objectives.**
The narrative text for **Environmental Wellbeing and Biosecurity** does not actually make reference to biosecurity in terms of what it is and why it is important, although addressing it holistically is given as an action.

**Another, rather more significant gap, relates to Transport.** Although a Strategic Objective in its own right, there seems to be a failure to grasp the importance of transport in underpinning many of the other objectives. For example, under **Sustainable Economic Development** it says that the Plan will build on and align with relevant plans and strategies followed by a list from which the National Transport Strategy and Strategic Transport Projects Review are conspicuous by their absence. Aquaculture is flagged up as having significant economic importance to rural and coastal communities, yet the Aquaculture industry in Shetland is being stifled by inadequate transport links to the Scottish Mainland – an issue that has been raised and evidence on multiple occasions with Transport Scotland but has still failed to influence any change in the North Isles Ferry Service provision when contracts were recently retendered.

Access to **health and social care** is highlighted as important but nowhere is transport mentioned as being a key factor in ensuring that access. Providing public transport coverage in some rural/remote areas presents serious challenges. It can simply not be affordable. Even where public transport exists, legislation does not require full accessibility for vehicles smaller than 22 seats, meaning that many feeder services are not accessible to wheelchair users or people with reduced mobility. The availability of wheelchair accessible taxis in Shetland is also very limited. The cost of providing transport is repeatedly cited as a major issue for 3rd sector organisations such as Ability Shetland, for whom it constitutes a major part of any funding application. Demand for transport for Adults and Children with Additional Support needs is increasing, as is the complexity of need. This comes at a cost and there are challenges for service provision in terms of workforce (driver and escort) availability. Active travel can have positive impacts on health and wellbeing, but the combined factors of distance between settlements, poor weather and single track roads can make it unviable for some island communities unless solutions are carefully tailored to their needs and multi modal travel is facilitated.

Transport is not mentioned at all in the narrative for **Climate Change & Energy** despite being the largest sectoral emitter of carbon.

The **Transport Section** itself highlights the importance of transport to the growth of sustainable tourism, before its importance in terms of wider sustainable economic development. It does not say much about the importance of transport in supporting ageing populations through access to healthcare, social and retail opportunities, or about the importance of transport in meeting aspirations for national growth in the food and drink industry. It does mention that transport systems on islands will have to play their role in reaching net zero emissions but does not acknowledge the huge financial cost associated with this. Nor does it address the challenge of providing public transport solutions in rural/remote areas where they have no commercial viability and so must be entirely subsidised by the public purse at Local Authority level. The advent of RET on ferries is highlighted as reducing fares for passengers and cars but it is not acknowledged that cabin costs are still a massive barrier to travel for many people – it is not reasonable to expect people to make an overnight
crossing on a lifeline service without the privacy and comfort of a cabin and a bed to sleep in. In fact, there is little on transport affordability in general, although local research has identified cost as more of a barrier to using public transport in Shetland than availability.

A lot is made of the importance of giving people a greater say but the experience of islanders in this regard has not been positive to date, with stakeholder and community input into the Northern Isles Ferry Service specification not heeded again and again by Transport Scotland resulting in a service that is far from fit for purpose. Citizens Panels run by Transport Scotland are flagged up as being positive but in reality they add an additional layer of consultation to an already overburdened landscape, and it would be far more meaningful and efficient to make use of Councils and RTPs who already have established relationships with their communities and key stakeholders as channels for community feedback. Recent workshops on the STPR2 illustrated clearly that people parachuted in from the Central Belt to undertake consultation do not gain a proper grasp of the issues, or at least are unable to articulate them clearly.

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

Some of the actions are vague and would need to be more focussed. Work is needed to drill down and express exactly what is needed – in many cases it is a practical element relating to transport/connectivity e.g. ‘promote a thriving business environment that allows individuals to pursue a wide range of economic opportunities’ would be better stated as ‘address transport and digital connectivity challenges (or invest in transport and digital connectivity solutions) to support a thriving business environment that allows individuals to pursue a wide range of economic opportunities’

‘Build on Scotland’s National Marine Plan to ensure that fishing and other economic activities stemming from the sea provide increased opportunities for island communities but at the same time are pursued in a sustainable manner’ would be better stated as ‘Build on Scotland’s National Marine Plan and ensure robust supply chains (or invest in transport solutions) to ensure that fishing and other economic activities stemming from the sea provide increased opportunities for island communities but at the same time are pursued in a sustainable manner’

Conversely, some actions are too focussed and need to be widened. ‘Ensure that legislation and policy relating to childcare is appropriately island-proofed’ should be ‘Ensure that all legislation and policy at national level is appropriately island-proofed as required by the Islands Act’.

A transport element is also needed in respect of the food & drink and tourist industries.

Actions relating to public bus transport and active travel are lacking, despite the principle that the strategy be green.

The cost of implementing the actions is entirely missing. ‘Work with transport-related stakeholders to have the most energy-efficient and climate-friendly transport services possible across the islands’ is a prime example. There are plenty of energy efficient solutions to be had, and implementing them is do-able but the missing element is funding to do it. The action might better be stated as ‘Work with transport-related stakeholders to identify the highest impact energy-efficient and climate-friendly
transport measures possible and identify funding to implement them across the islands'.

It is important to ensure that the burden of action does not fall on volunteers within local communities. ‘Community-run businesses’ must not in reality be ‘volunteer-run businesses’. Long term funding for local development workers is essential if this is to be avoided. Short term and part time contracts do not attract the calibre of staff or commitment required for such roles.

Caution should also be exercised in the use of participatory budgeting, to ensure that funds do not simply go to groups with the most popularity or who shout loudest, exacerbating inequalities still further.

The Action ‘showcase leadership in the public sector demonstrating that jobs and careers can be successful on islands’ is just incredibly patronising.

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 principles of fairness, integration, greenness and inclusivity are strongly evident within the plan but there are weaknesses.

Not enough is made of the link between fairness/inclusivity and affordability. Affordability of public transport, and affordability of lifeline transport (particularly cabin accommodation) are major barriers to fairness and inclusivity in Shetland but there is no sense of how this might be addressed. In terms of greenness, transport is the largest sectoral emitter of carbon, but there is no concrete sense of how development and implementation of greener transport solutions is actually to be effected and, more critically, funded.

As already stated there seems to be a fundamental lack of understanding in terms of the importance of transport to meeting several of the strategic objectives. Integration would require that this be addressed so that issues can be considered from all relevant angles. Integration must also involve recognition of and integration with existing local Community Plans, strategies and organisations – particularly Community Planning Partnerships, Regional Transport Partnerships and Health and Social Care Partnerships who provide an important interface between national bodies and local communities.

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?

Strategic Objective 13 deals with the issue of effective implementation and performance monitoring. At this stage detail on targets and indicators is understandably lacking. The next step must be developing realistic targets in terms of outcomes and appropriate indicators. It is vital that this is done with reference to, and in line with existing Community Plans (i.e. Local Outcome Improvement Plans) and other high level local strategies to make sure that public bodies at all levels are working towards the same clearly defined outcomes and to avoid duplication of activity / ensure efficiency in terms of monitoring activity. Community Planning Partnerships, Regional Transport Partnerships and Health and Social Care Partnerships are all important intermediaries between national bodies and local
communities. Community engagement in terms of consultation and data gathering should be channelled through these bodies, making use of existing relationships rather than creating another tier of engagement which could prove confusing and frustrating for communities and reduce accountability.

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

It is good to see that climate change is being placed at the heart of strategic documents at national level including the NIP and the NTS. It is important to recognise the particular challenges the islands can face in regards to carbon reduction and tailor approaches accordingly.


Active travel opportunities are limited in rural/remote/island areas so investment in greener motor transport is essential - ferries, planes, buses and taxis - if such areas are really to contribute to climate change targets whilst maintaining adequate connectivity to support necessary economic and social outcomes. How this is realistically to be achieved in areas where public transport systems are not commercially viable and require significant subsidy to begin with presents a serious challenge that must be acknowledged and addressed.

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

As previously stated, Strategic Objective 13 deals with the issue of effective implementation and performance monitoring. It is not possible to assess how the plan delivers against the NPF and SDGs until implementation and monitoring are underway. However, it is important that implementation and monitoring is done in close collaboration with Community Planning Partnerships, Regional Transport Partnerships and other key stakeholders, and that it aligns with local Community Plans and strategies in terms of activity, the outcomes it is trying to achieve and the indicators used to assess impact.