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# NORTH AYRSHIRE COUNCIL

11<sup>th</sup> June 2019

## Cabinet

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**Title:** National Islands Plan and Island Communities Impact Assessment Consultation.

**Purpose:**

- 1) To seek Cabinet approval for the North Ayrshire Council response to the Scottish Government's consultation on the National Islands Plan and Island Communities Impact Assessment.
- 2) To seek Cabinet approval for the inclusion of the responsibility for islands matters in North Ayrshire within the portfolio of the Cabinet Member for Economic Growth.

**Recommendation:** That Cabinet:

- a) Approves the proposed North Ayrshire Council response to the National Islands Plan and Island Communities Impact Assessment consultation; and
- b) Approves the inclusion of the responsibility for islands matters in North Ayrshire within the portfolio of the Cabinet Member for Economic Growth.

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## 1. Executive Summary

1.1 North Ayrshire Council previously reported to Cabinet on 26<sup>th</sup> September 2017 on the proposed Islands Bill. This was enacted on 6<sup>th</sup> July 2018. The current report to Cabinet focuses on North Ayrshire Council's response to Scottish Government consultation on two elements of the Islands Act: the proposed National Islands Plan and Island Communities Impact Assessments.

1.2 North Ayrshire Council's responses to the consultation questions (Appendix 1) are based on our previous response to the Islands Bill consultation; ongoing engagement with our communities, including Scottish Government consultation events on Arran and Cumbrae; and new developments which have emerged since the previous report, notably the ongoing Local Governance Review and the Ayrshire Growth Deal.

## 2. Background

2.1 In June 2014, on conclusion of the Island Areas Ministerial Working Group's work, the Scottish Government published the *Empowering Scotland's Island Communities* prospectus,<sup>1</sup> presented as a coherent package of measures that developed a set of proposals based on three underpinning objectives:

- Promoting the voice of island communities;
- Harnessing island resources; and
- Enhancing the wellbeing of island communities

2.2 Following the *Empowering Scotland's Island Communities* prospectus, the Scottish Government consulted on provisions for a future Islands Bill. A key focus of this consultation was the aspect of 'island-proofing', consulting on its inclusion as a principle within any future Island Bills to formalise the approach in legislation.

2.3 The Islands (Scotland) Bill 2018 received Royal Assent on 6 July 2018. The first Commencement Regulations for the Island Act were laid on 20 September 2018 and came into force on 4 October 2018.

### **National Islands Plan**

2.4 According to the Islands (Scotland) Act 2018, the purpose of the Plan is "to set out the main objectives and strategy of the Scottish Ministers in relation to improving outcomes for island communities that result from, or are contributed to by, the carrying out of functions of a public nature."

2.5 Section 3(3) of the Act provides a number of areas for improving outcomes for island communities, including:

- a) Increasing population levels;
- b) Improving and promoting:

- (i) sustainable economic development;
- (ii) Environmental wellbeing;
- (iii) health and wellbeing, and
- (iv) community empowerment

- c) Improving transport services;
- d) Improving digital connectivity;
- e) Reducing fuel poverty;
- f) Ensuring effective management of the Scottish Crown Estate (that is, the property, rights and interests to which section 90B(5) of the Scotland Act 1998 applies); and
- g) Enhancing biosecurity (including protecting islands from the impact of invasive non-native species).

2.6 However, this is not an exhaustive list. Scottish Government emphasises that the National Islands Plan is not limited by Section 3(3), but rather will develop organically from the data gathered during the consultation process. Consequently, the National Islands Plan will include objectives and strategies related to those sectors linked to the

carrying out of functions of a public nature that will improve outcomes for island communities, even outcomes not included in section.

- 2.7 The first draft of the National Islands Plan must come before Scottish Parliament within 12 months of Part 2 of the Act coming into force, which in this instance means a draft of the Plan must be submitted by 4 October 2019.
- 2.8 Scottish Government states that so far as possible the National Islands Plan will include means to measure whether the outcomes identified have improved for island communities. This may well require the use of indicators, which will assess the degree of success in progress towards the objectives set out in the National Islands Plan.
- 2.9 In this respect, the Scottish Ministers will report on the Plan annually to monitor its progress and to consider where outcomes may or may not have improved. In addition, the Scottish Ministers will also review the National Islands Plan before the end of the period of five years beginning with the day on which the plan was last published.
- 2.10 The Islands (Scotland) Act clarifies that “in preparing the national islands plan, the Scottish Ministers *must consult* each local authority listed in the schedule, such other persons as they consider represent the interests of island communities, and such persons (including members of island communities and other persons) as they consider likely to be affected by or have an interest in the proposals contained in the plan”.
- 2.11 Accordingly, Scottish Government has decided to undertake a wide consultation with island communities. They stress that this is not simply a procedural requirement, but an essential means to properly develop the National Islands Plan in a way that truly responds “to the distinctive geographical, natural heritage and cultural characteristics (including the linguistic heritage) of each of the areas inhabited by island communities.”
- 2.12 Developing a plan which responds to “linguistic heritage” will include asking island communities how the Plan should take into account the needs of Gaelic speakers in island communities, and how this will interact with any commitments made by authorities in any Gaelic language plan they have produced under the Gaelic Language (Scotland) Act 2005.
- 2.13 North Ayrshire Council welcomes the proposal to develop legislation through an Islands Bill. We recognise the exigencies of island life and their communities and we also value and recognise the increasing aspirations of our island communities. Our islands have a unique culture and this is central to our spectacular tourism product in North Ayrshire. We wish to support and promote the priorities of our islands communities to create a sustainable and secure future for and with them.
- 2.14 Our response to the key consultation questions (some questions are for island residents as opposed to public bodies) is summarised below and the full text is attached at Appendix 1. North Ayrshire Council has listened to the views of its island residents in order to construct the consultation response.

## 2.15 National Islands Plan

Q12. What should be the main objectives for the National Islands Plan?

*It is important that the effect of the Bill is to empower island communities. In line with the Community Empowerment Act's recommendations, the Plan should focus on inclusive economic growth, reducing inequalities and capacity building in island communities to strengthen communities in fragile areas.*

*The National Islands Plan needs to focus on:*

- *Reducing the disadvantages of living on an island;*
- *The implications and impact of the removal of EU funding;*
- *EU Exit implications for our islands; and*
- *Inclusive growth and the socio-economic duty.*

Q13. What should be the key priorities for the Scottish Government in relation to the National Islands Plan?

*Through ongoing engagement with our island communities on Arran and Cumbrae, the following key priorities, while not exhaustive, are recurring themes:*

- *Economic growth, investment and sustainability;*
- *Reliance on seasonal tourism and the need for diversification;*
- *Community capacity and empowerment;*
- *Education and skills and retention of young people;*
- *Recruitment and retention of employees;*
- *Population and depopulation;*
- *Housing;*
- *Transport;*
- *Marine planning;*
- *Health and social care;*
- *Meeting the needs of older people;*
- *Energy and energy costs;*
- *Connectivity/digital (Arran);*
- *"Island premium" costs;*
- *Resilience;*
- *Planning policy;*
- *Preservation of heritage and cultural identity; and*
- *Protection of natural environment.*

Q14. What should be taken into account in terms of the functions of relevant authorities within the National Islands Plan?

*The implications of the current Local Governance Review should be considered in relation to the Islands Plan and Impact Assessments, and vice versa.*

*The National Islands Plan and island proofing need to have regard to, and be part of a much wider, integrated strand of post-Christie public sector policy that includes the following themes:*

- *Empowered and supported communities, working with public sector organisations on shared priorities;*
- *Targeting of resources need to achieve outcomes;*
- *Subsidiarity;*
- *Inclusive growth; and*
- *Socio-economic duty.*

Q15. How can we measure outcomes in relation to the National Islands Plan?

*North Ayrshire Council believes it is imperative that the outcomes identified in the National Islands Plan articulate with the desired local outcomes and do not result in proliferation of priorities and outcome measures. In the case of North Ayrshire these are articulated with and by our communities mainly through our CPP and HSCP locality planning process (which is applied across North Ayrshire, not just in areas of deprivation) and reflect the priorities of the local area, and also in local economic plans where appropriate.*

## **2.16 Island Communities Impact Assessments**

Q21. What should be the main objectives for Island Communities Impact Assessments?

*North Ayrshire's opinion, and that of our island communities, is that in order to ensure proper consideration of the potential impact on island residents of the adoption of policy changes, there should be a statutory requirement to prepare island impact assessments to take cognisance of the potential impacts on island communities.*

*As in our previous response to the Scottish Government consultation on the Islands Bill, we suggest that the Equalities model is followed as far as possible.*

Q22. What do you think needs to be considered in the guidance and templates which will be developed to support the carrying out of Island Communities Impact Assessments by relevant authorities?

*North Ayrshire Council's position, especially in relation to our Fair for All Inequalities Strategy and inclusive growth, is that it is essential that living in an island location should not be an unnecessary barrier for anyone with protected characteristics from accessing required services.*

*We also believe that proportionality is important, and propose that the approach which is developed should reflect current local authority equality impact assessments, which are based on screening processes which then inform full impact assessments where it is identified that there is a requirement.*

Q23. What should be taken into account in relation to the reviews of decisions of relevant authorities relating to Island Communities Impact Assessments?

*In making decisions relating to North Ayrshire, organisations will need to consider both the socio-economic duty and the needs of islands. These duties overlap and occasionally might need to be balanced against each other. In addition, resources are, and will continue to be,*

*an important factor in how decisions are made, and the acknowledgement of this is important in any review process.*

## **2.17 North Ayrshire Council Islands Portfolio**

2.17.1 North Ayrshire Council also wishes to reflect the priority it places on our island communities by specifically including the remit for islands within the portfolio of the Cabinet Member for Economic Growth, and this will include further work in relation to the National Islands Plan and Islands Communities Impact Assessments.

## **3. Proposals**

3.1 It is proposed that Cabinet:

- a) Approves the proposed North Ayrshire Council response to the National Islands Plan and Island Communities Impact Assessment consultation; and
- b) Approves the inclusion of the responsibility for islands matters in North Ayrshire within the portfolio of the Cabinet Member for Economic Growth.

#### 4. Implications/Socio-economic Duty

<b>Financial:</b>	There are no financial implications in the current report.
<b>Human Resources:</b>	There are no HR implications in relation to this report,
<b>Legal:</b>	There are no legal implications in relation to this report.
<b>Equality/Socio-economic Duty:</b>	The consultation response focuses on the importance of the equality and socio-economic duties of public sector bodies in the design and implementation of both the National Islands Plan and the Islands Communities Impact Assessment. The proposals explicitly express the intention of creating more equality for island communities.
<b>Children and Young People:</b>	Children and Young People are key considerations in the themes which are proposed as priorities within the National Islands Plan and the Islands Communities Impact Assessment, including education and skills and retention of young people in island communities.
<b>Environmental &amp; Sustainability:</b>	There are no environmental and sustainability implications arising directly from this report, although the proposed priorities include marine planning, sustainability, biodiversity and environmental landscape and built heritage.
<b>Key Priorities:</b>	The proposal contained within the report supports the North Ayrshire Council Plan priorities: <ul style="list-style-type: none"><li>• Active and strong communities</li><li>• Inclusive, growing and enterprising local economy</li><li>• People enjoy good life-long health and well-being.</li></ul>
<b>Community Benefits:</b>	The National Islands Plan and the Islands Communities Impact Assessment have the potential to deliver significant benefit for island communities across a range of key issues as highlighted in the consultation response.

#### 5. Consultation

- 5.1 This response has been compiled with contributions from a number of Council and community partners, including participation in the Scottish Government's community engagement events in Arran and Cumbrae on 22<sup>nd</sup> and 23<sup>rd</sup> May 2019 respectively.

Craig Hatton  
Chief Executive

For further information please contact **Audrey Sutton, Head of Service (Connected Communities)**, on **(01294) 324414**.

**Background Papers**

Appendix 1: North Ayrshire Council response to the Scottish Government National Islands Plan and Islands Communities Impact Assessment Consultation.

## **Appendix 1**

### **The Scottish Government's Consultation on the National Islands Plan and Island Communities Impact Assessment.**

#### **North Ayrshire Council**

Responses due 6<sup>th</sup> July 2019

#### **Consultation questions**

We want the National Islands Plan to be a document that builds on what works well on Scottish islands, and which addresses the challenges faced by islands and their communities. The Plan will set out how the Scottish Government, local authorities and other public agencies might work to improve outcomes for island communities. Scottish Ministers will be asked to report back to Scottish Parliament every year on progress towards the goals included in the National Islands Plan.

The Plan, therefore, is key to how we will all work together with island communities in the future. It is therefore vital that as many people as possible who live, work and interact with Scotland's islands and their communities take part in this consultation. We want to hear people's experiences and especially, their views about what we can build on and do differently in the future. The questions set out below aim to give people the chance to shape the National Islands Plan in a way that truly responds to their interests and aspirations. Please take part.

Q1. If applicable, which island(s) do you live on or do you relate to?

The Isle of Arran and the Cumbraes

#### **National Islands Plan**

Q2. If applicable, what is good about living on your island? Please state 3 things that you like about living on your island.

*Local Authority response – not applicable*

Q3 If you've moved away from your island, please tell us why you left (for example, was it for work opportunities or for education)?

*Local Authority response – not applicable*

Q4. If you've moved away from your island, please tell us what, if anything you miss about island life.

*Local Authority response – not applicable*

Q5. If possible, please can you give us some examples of good local initiatives/projects/activities, etc?

*Local Authority response – not applicable*

Q6. The Islands (Scotland) Act lists a number of areas that are relevant for islands and island communities. Please rank these in order of priority for you:

- Depopulation
- economic development
- environmental protection
- health and wellbeing
- community empowerment
- transport
- digital connectivity
- fuel poverty
- land management
- biosecurity

*All of these issues are important to North Ayrshire Council.*

Do you feel that this list covers all aspects of island life?

- Yes
- No
- Don't know

Q7. If you answered no, is there anything else that you believe the National Islands Plan should address?

*Local Authority response – not applicable*

Q8. If applicable, are there any specific challenges about living on your island? Please state 3 challenges about living on your island.

*Local Authority response – not applicable*

Q9. If you've moved away, please tell us about any challenges that you experienced whilst you were living on your island.

*Local Authority response – not applicable*

Q10. If applicable, what could be done to make living on your island better?

*Local Authority response – not applicable*

Q11. How do you feel the National Islands Plan should address and respond to the distinctive geographical, natural heritage and cultural characteristics (including the linguistic heritage) of local island communities, including the needs of Gaelic speakers within those communities?

*Local Authority response – not applicable*

### **National Islands Plan: General Questions Section:**

So as many people and agencies as possible have an opportunity to help us shape the National Islands Plan, we would like to capture the views of relevant authorities, national, local and community groups, development trusts and other such partners with an interest in islands,

Q12. What should be the main objectives for the National Islands Plan?

*North Ayrshire Council welcomes the proposal to develop legislation through an Islands Bill. We recognise the exigencies of island life and their communities and we also value and recognise the increasing aspirations of our island communities. Our islands have a unique culture and this is central to our spectacular tourism product in North Ayrshire. We wish to support and promote the priorities of our islands communities to create a sustainable and secure future for and with them.*

*It is also important that the effect of the Bill is to empower island communities. In line with the Community Empowerment Act's recommendations, the Plan should focus on inclusive economic growth, reducing inequalities and capacity building in island communities to strengthen communities in fragile areas.*

*The national Plan needs to focus on:*

- Reducing the disadvantages of living on an island, including those of higher prices, housing shortages and competitive disadvantages.*
- The implications and impact of the removal of EU funding, which is targeted at areas furthest from the centre to reduce their competitive disadvantage. Replacing EU funding with the right type and level of domestic funding is critical. Less prosperous regions in the UK will lose access to £2.4billion a year for social and economic development – comprising EU Structural and Investment Funds (ESIF) and domestic match funding - unless successor or*

*replacement frameworks and funding programmes are put in place. At the heart of the proposed approach to a new UK Shared Prosperity Fund (UKSPF), proposed by the UK Government, should be the need to reduce regional inequality and achieve inclusive growth post-Brexit. This will require resources to be targeted at less prosperous areas. Resources allocated to this successor programme need to compensate for the loss of EU funding and provide additional resources to match the scale of national and regional objectives for achieving inclusive growth.*

- *EU Exit implications for our islands, which include a reliance on tourism and in many cases on EU workers who may leave the UK.*
- *Inclusive growth and the socio-economic duty. Stark levels of regional inequality in the UK have been well-documented, however this is also an issue impacting the Scottish economy and our ambitions of inclusive growth. The Fraser of Allander Institute (2018) have recently highlighted this in their economic commentary: GVA per head in Edinburgh is nearly 2.5 times higher than in East and North Ayrshire. In the past 20 years this gap has widened – GVA per head in Edinburgh has nearly doubled since devolution, with growth in East and North Ayrshire around half that rate.*
- *Scottish Government's Economic Strategy (2015) states that uneven growth is evident within Scotland, with the gap in output per person between Edinburgh and East & North Ayrshire highlighted as a specific example. This 'regional gap' was also picked up in a report on Scotland's economic performance in June 2018 by Scottish Parliament's Economy, Jobs and Fair Work Committee Inquiry. The Committee made the recommendation that: 'it is vital that the gap between low-performing and high-performing regions in Scotland is reduced.'*
- *North Ayrshire Council recognise that in an increasingly challenging economic environment, we have to work in new ways in order to deliver inclusive growth. As a result, working in partnership with the Scottish Government's Office of Chief Economic Advisor, the Council piloted the 'Inclusive Growth Diagnostic'. The main purpose of the Diagnostic was to identify constraints and opportunities for driving inclusive growth in North Ayrshire in order to prioritise actions to address them at a time of constrained public sector resources. Jobs density was one of the key constraints identified by the diagnostic – indeed North Ayrshire has one of the lowest job densities in Scotland – and this highlights that the Council is unable to achieve inclusive growth without a change in national policy and investment, and as such investment should be targeted where there is most need, for example areas of market failure, and impact will be greatest. The Council is keen to share learning on the diagnostic as an important tool for targeting resources.*
- *Investment decisions by Scottish Government appear to be focussed on maximising economic growth, which has recently included investing in the central belt (the Medicines Manufacturing Innovation and Scottish Social Security Agency decisions are recent examples of decisions which prioritised connectivity and existing city labour resource over inclusive growth). The danger is that unless there is a genuine commitment to reducing the*

*competitive disadvantage of islands and prioritising this over investment which produces the highest GDP, the National Islands Plan and island proofing will not deliver its objectives for island communities.*

*In our response to the current proposals, we have consulted with representatives of our island communities in order to accurately reflect their views.*

Q13. What should be the key priorities for the Scottish Government in relation to the National Islands Plan?

*Through ongoing engagement with our island communities on Arran and Cumbrae, the following key priorities are recurring themes:*

- *Economic growth, investment and sustainability, and retention of local businesses, requiring more targeted investment by public and private sector to create small scale craft and retail opportunities which will provide employment and create resilience.*
- *Reliance on seasonal tourism and the need for diversification.*
- *Community capacity and empowerment, including more subsidiarity and control of local budgets.*
- *Education and skills and retention of young people on the islands.*
- *Recruitment and retention of employees, including proposals for an islands' allowance for key staff.*
- *Population and depopulation and the demographic imbalance.*
- *Housing, including affordable housing. older people's housing and local construction and policy.*
- *Transport, including the impact of RET on our island residents; concessionary transport; cycling infrastructure; need for more reliable ferry service (Arran); more integrated transport arrangements across providers, including online purchasing; priority for residents on ferries; better disabled facilities and a strategic approach to regulation of the number of vehicles allowed on to the islands (Cumbrae).*
- *Marine planning, including licensing, as included in the Islands Bill. This approach is consistent with the empowerment of communities and work to further devolve powers from the Crown Estate, Scotland. Currently, statutory regional marine planning for the Clyde Estuary has been devolved to the Clyde Marine Planning Partnership (CMPP), in which public authorities, including North Ayrshire Council plays a role. The CMPP provides an opportunity for island communities to promote sustainable development of their own waters, which best reflect the commercial, recreational and conservation interests of the islands. This acknowledges that one size does not fit all in relation to island communities. The opportunity to exercise development control over territorial sea around the coast lines and the granting of certain financial powers to borrow, invest and participate in business would be relevant to all Councils with island responsibilities. However, consultation with island communities is critical in these responsibilities.*
- *Health and social care, especially lack of care homes, need for improved care at home packages and better transport to hospital.*

- Meeting the needs of older people.
- Energy and energy costs.
- Connectivity/digital (Arran).
- Marine planning.
- “Island premium” costs.
- Resilience.
- Planning policy.
- Preservation of heritage and cultural identity
- Protection of natural environment.

*It is acknowledged that this list is not exhaustive and North Ayrshire Council recommends that the characteristics included within the plan should not be restricted due to the uniqueness of individual island communities across Scotland.*

*Our island communities have forged unique cultural identities and have a priceless heritage because of their geographic character. This has an intrinsic global value which connects islanders, emanating from extended periods of isolation from mainland communities during which islanders have developed independence and self-reliance. The relationship between communities and coastal waters is subtly different to coastal communities; a daily visual connection to livelihood, leisure and mainland.*

*The Gaelic language references the local geography in a completely different way to English. For example, the translation for North Ayrshire Council/ Comhairle Siorrachd Àir a Tuath is constructed as the Council for the area to North of the mouth of the River Ayr. The preservation of Gaelic language and culture has been strong in Arran communities and schools, the annual Fèis Arainn attracting sustained high numbers of children and young people to take part in and celebrate Gaelic culture and music.*

*Island communities are passionate about capturing and sharing the uniqueness of the island experience, with heritage trails, oral histories and independent museums. Similarly, there are strong feelings about preserving the built heritage and natural environment, not just for the economic value of the tourism industry but for the quality of islanders’ lives and as a legacy for generations to come.*

*The second edition of the North Ayrshire Council Gaelic Language Plan is currently open for consultation and demonstrates the Council’s nurturing and supportive approach to Gaelic; an approach which is mirrored in its support for island communities’ cultural and heritage initiatives.*

Q14. What should be taken into account in terms of the functions of relevant authorities within the National Islands Plan?

*The implications of the current Local Governance Review should be considered in relation to the Islands Plan and Impact Assessments, and vice versa.*

*The National Islands Plan and island proofing need to have regard to, and be part of a much wider, integrated strand of post-Christie public sector policy that includes the following themes:*

- *Empowered and supported communities, working with public sector organisations on shared priorities*
- *Targeting of resources need to achieve outcomes*
- *Subsidiarity*
- *Inclusive growth*
- *Socio-economic duty.*

*Many of these issues are currently being explored through the Local Governance Review. A comprehensive approach to locality planning, as developed in North Ayrshire, has demonstrated the need for a comprehensive fact-based area profile to inform the agreement by communities and CPP of shared priorities, sufficient resource (both staffing and through PB and our Community Investment Fund) to support communities and integrated public sector working.*

*North Ayrshire Council welcomes the proposal to develop legislation through an Islands Bill, with the proviso that the local authority and island communities are involved in the development of the legislation. North Ayrshire believes it is important to ensure that the Islands Bill is taken forward in the context of (a) Locality Planning as recently provided for in the Community Empowerment (Scotland) Act 2015, and (b) subsidiarity, that power should be delegated as close as possible to people. North Ayrshire Council is already recognising the special role of our islands and is addressing the concept of island specific plans through our Locality Planning arrangements and the Arran and Cumbrae Economic Plans, currently being reviewed to reflect the significant focus on the islands of the Ayrshire Growth Deal investment.*

*The commitment of public sector partners to invest between £3m and £4m in marine tourism to stimulate private sector and community-led activity will have a significant impact on the economic development of the islands. Further investment at Hunterston in relation to the circular economy, at Ardrossan in relation to marine infrastructure and public realm and at Irvine and Ardeer in relation to leisure and residential investment will also impact positively on the relationship between the islands and the mainland, delivering opportunities for employment and retention of residents.*

*The process of producing the economic plans has required significant engagement and consultation with island stakeholders and local business communities and this has ensured that we have the support and buy-in of local island people.*

*The development of a National Islands Plan would provide a consistent and transparent means of planning for and reporting on a range of commitments across all policy areas and would ensure that the empowerment and equality of island communities would be kept on the national local agenda. North Ayrshire Council believes that this approach would fit well with our developing Locality Approach and that the priorities and equality issues which currently emerge from our island specific work will have the opportunity to be reflected through a National Islands Plan. It makes sense to ensure that any new planning and reporting requirements and mechanisms fit with the existing landscape, to ensure coherence and*

*relevance to local needs.*

*It is important that island proofing supports Locality Planning and subsidiarity rather than being taken forward in isolation. A one size fits all should be avoided and the increasing acknowledgement of asymmetry is very welcome. Legislation and guidance needs to allow scope to tailor outcomes towards the needs of the specific island but additional layers of planning should be avoided where possible.*

*It is also important to recognise the difference between Island Authorities and Local Authorities with islands, ensuring that decision making and resultant impact takes this into account.*

*The principle of consulting and negotiating specifically with islanders on the impact of policies that affect them is generally welcome. A key theme which emerged in our engagement was the importance of the islands, and local authorities with islands, having a formal voice in the process of developing a national plan, and how local views and particularities could be reflected in a national plan as well as in local islands plans. It will therefore be important to consider how the relationship between the plan and the local policies will develop, and how the process of engagement and consultation will be carried out, including recognising a range of local organisations in this process.*

*North Ayrshire Council also proposes that all relevant local authorities and community planning partners should be statutory consultees in the process of drafting the national islands plan, to ensure that all aspects of issues affecting island communities are included and considered and to ensure a focus on improving outcomes for island communities.*

Q15. How can we measure outcomes in relation to the National Islands Plan?

*As highlighted elsewhere in this response, it is imperative that the outcomes identified in the National Islands Plan articulate with the desired local outcomes and do not result in proliferation of priorities and outcome measures. In the case of North Ayrshire these are articulated with and by our communities mainly through our CPP and HSCP locality planning process (which is applied across North Ayrshire, not just in areas of deprivation) and reflect the priorities of the local area, and also in local economic plans where appropriate.*

*These priorities are identified and measured through a variety of approaches:*

- *The Local Outcomes Improvement Plan*
- *The Fair for All Inequalities Strategy, with a strong focus on child poverty*
- *Locality Plans and HSCP Locality Partnership Forum plans (on Arran, for example, these are one and the same thing, exemplifying an attempt to reduce rather than increase duplication)*
- *The North Ayrshire Council Plan*
- *HSCP Strategy*
- *Partnership strategies, e.g. the Children's Services Strategic Plan, Safer North Ayrshire*

- *Clyde Marine Planning Partnership*
- *Local economic plans*
- *Best Value processes*
- *Statutory inspections.*

*It is important, therefore, that the National Islands Plan is designed in such a way as to support local priorities and to provide guidance and support in reinforcing the ways in which we can support our island communities rather than adding another layer of bureaucracy to the landscape. We have confidence that the practical support which will be provided to public sector partners and communities by the Plan will enhance the existing landscape.*

Q16. If you have any further comments or points that you think should be taken into account in the development of the National Islands Plan, please state these below.

*North Ayrshire Council and its island communities is generally in favour of the scope of the Plan and its aspirations and would be happy to assist in the further development of any of the constituent proposals.*

*However, the amount and type of resources required to implement the various aspects of the Plan need to be considered, especially since the basis for the proposals is an island authority, where it may be expected that existing resources may be better and more proportionately geared towards “islands” issues.*

*North Ayrshire Council believes that further exploration is required in relation to the differences between the 6 local authorities covered by the proposed Plan.*

*In discussions with islands representatives in North Ayrshire it is also a very strongly view any future Islands Plan should properly reflect the position of islands that lie within mixed mainland/island local authorities.*

*Moreover, in some aspects of the proposed Islands Plan there is not currently enough information available to provide a definitive opinion, and future engagement on these components would be welcome.*

## **Island Communities Impact Assessment**

Island Communities Impact Assessments will be one way in which relevant authorities can consider the impact of new laws, policies, strategies or services on islands. Guidance will be developed on how these impact assessments will operate and we believe that your input to this consultation can help us with this:

Q17. Can you name any policies, strategies or services that don't work very well for your island? Why do you feel they don't work well?

*Local Authority response – not applicable*

Q18. On the other hand, can you name any policies, strategies or services that **DO** work well for your island? Please tell us what it is about these that works so well.

*Local Authority response – not applicable*

Q19. How can Scottish Ministers and other relevant authorities involve island communities in assessments?

online surveys

focus groups

public meetings

paper documents

other (please comment)

*Local Authority response – not applicable*

Q20. Is there anything else you would like to tell us?

*Local Authority response – not applicable*

### **Island Communities Impact Assessments – General Questions Section:**

Guidance on how an Island Communities Impact Assessment should be carried out is not present in the Islands (Scotland) Act. Rather, the Act enables Ministers to develop guidance about the duty to have regard to island communities, of which the Island Communities Impact Assessment forms part.<sup>[16]</sup> The Scottish Ministers are also required to develop regulations “about reviews of decisions of relevant authorities relating to island communities impact assessments”.

So as many people and agencies as possible have an opportunity to help us shape guidance and templates for Island Communities Impact Assessments, we would like to capture the views of relevant authorities, national, local and community groups, development trusts and other such partners with an interest in islands.

Q21. What should be the main objectives for Island Communities Impact Assessments?

*North Ayrshire’s opinion, and that of our island communities, is that in order to ensure proper consideration of the potential impact on island residents of the adoption of policy changes, there should be a statutory requirement to prepare island impact assessments to take cognisance of the potential impacts on island communities. This should be confirmed as a requirement to have “due regard” rather than “regard” as proposed currently, in order to strengthen the requirement on the public authorities listed in the proposals. We note that this aligns with the Community Empowerment (Scotland) Act 2015 which imposes a duty to act with a view to*

*reducing inequalities and socio-economic disadvantage.*

*As in our previous response to the Scottish Government consultation on the Islands Bill, we suggest that the Equalities model is followed as far as possible. There is already established jurisprudence and remedies for failure to assess.*

*In North Ayrshire, our islands have a different profile from much of the mainland. Much of our mainland has high levels of deprivation and unemployment. Arran and Cumbrae has different challenges, as highlighted earlier, such as housing, provision of care for older people, outward migration of young people and transport.*

*In making decisions relating to North Ayrshire therefore, organisations will need to consider both the socio-economic duty and the needs of islands. These duties overlap and occasionally might need to be balanced against each other in the light of continuing pressures on local government resources. It is therefore important that they are considered together, along with equalities. For that reason we would reiterate that island proofing should form part of the same process as assessing equalities and socio-economic duty impact. It is recommended therefore that existing screening and EIA processes are expanded to include island proofing.*

Q22. What do you think needs to be considered in the guidance and templates which will be developed to support the carrying out of Island Communities Impact Assessments by relevant authorities?

*North Ayrshire Council's position, especially in relation to our Fair for All Inequalities Strategy, is that it is essential that living in an island location should not be an unnecessary barrier for anyone with protected characteristics from accessing required services.*

*North Ayrshire is also the Carnegie UK test site for Kindness and we have been examining how individual, community, and crucially, organisational intentions and actions can be designed to deliver the best outcomes for communities. This approach underlines our approach to the socio-economic duty and to co-designing outcomes and outputs with those we serve.*

*We also believe that proportionality is important, and propose that the approach which is developed should reflect current local authority equality impact assessments, which are based on screening processes which then inform full impact assessments where it is identified that there is a requirement.*

*Our view is that it is important for relevant local authorities to be statutory partners in the consultation in relation to impact assessments and North Ayrshire would be willing to be involved in the development of this process.*

*North Ayrshire Council also proposes that the new Social Security Agency and Skills Development Scotland should be included as relevant authorities.*

*Consideration of the role of Lottery funded agencies may be worthwhile.*

*North Ayrshire Council agrees that this should apply to proposed legislation which is both primary and secondary in nature which it is anticipated will have a significantly*

*different effect on an island community from its effect on other communities in Scotland.*

*The Islands Community Impact Assessment guidance should highlight the potential impacts, risks and benefits of the proposed policy, service or project in relation to islands communities.*

*We propose that Island Community Impact Assessments should consider the following:*

- *Changes to strategies, policies, working practices and how we deliver services: are these likely to have a positive or negative impact on the people we serve?*
- *How can we plan to reduce or remove negative impact by making reasonable changes to how a particular group receives a service?*
- *Ensure that no one is unintentionally excluded because of specific characteristics, including being resident on an island.*

*The assessments should be carried out during the early stages of any strategy or policy review, a new project or a major change to a service.*

*Engagement and/or consultation should take place with appropriate and representative groups of island communities that are most likely to be affected. This must then be used to help shape the design/outcomes of the project.*

*Issues identified by the islands communities themselves must feature in the impact assessments. As stated in Q13 above, these have been identified (though not exclusively) as follows:*

- *Economic growth and investment*
- *Education and skills*
- *Retention of young people*
- *Population*
- *Housing*
- *Transport, including concessionary transport*
- *Energy*
- *Connectivity/digital*
- *Marine planning*
- *“Island premium” costs*
- *Health and social care*
- *Older people*
- *Community capacity*
- *Resilience*
- *Planning policy*
- *Preservation of heritage and cultural identity*
- *Protection of natural environment.*

*North Ayrshire has also been at the forefront of developing inclusive growth approaches, including the application locally of theory into practice. The inequalities identified within this work (health, disability, caring responsibilities, transport) may in*

*some cases be amplified within our island communities and this should be considered within the Island Community Impact Assessments.*

Q23. What should be taken into account in relation to the reviews of decisions of relevant authorities relating to Island Communities Impact Assessments?

*It would be useful to consider any enforcement mechanism. Will this be progressed via the courts or the Ombudsman; will there be a new mechanism for these reviews; and will subsequent guidance address this?*

*As highlighted in Q21, in making decisions relating to North Ayrshire, organisations will need to consider both the socio-economic duty and the needs of islands. These duties overlap and occasionally might need to be balanced against each other. It is therefore important that they are considered together, along with equalities. This will require to be an important consideration when reviewing the rationale for decisions taken.*

*In addition, resources are, and will continue to be, an important factor in how decisions are made, and the acknowledgement of this is important in any review process.*

Q24. If you have any further comments or points that you think should be taken into account in the development of Island Communities Impact Assessments, please state these below.

*North Ayrshire would be happy to assist in further development of the National Islands Plan and Island Community Impact Assessments.*

[About you](#)  
[Consultation](#)

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