

Consultation Title	National Islands Plan and Islands Communities Impact Assessment
Date	26 July 19
From	Scottish Land & Estates Stuart House Eskmills Business Park, EH21 7PB
Telephone	0131 653 5400
Email	gavin.mowat@scottishlandandestates.co.uk

Scottish Land & Estates (SLE) is the voice of rural businesses throughout Scotland. We are a membership-based organisation representing a wide range of rural businesses, including farmers, foresters, tourism operators, housing providers, leisure companies, and renewable energy providers.

Our members provide a wide range of economic, environmental and social benefits which are vital to the success and survival of communities throughout rural Scotland including the islands. They play a critical role in ensuring sustainable, healthy and empowered rural communities, providing housing, employment and a wide range of economic, environmental and social benefits.

As an organisation SLE has responded to some of the questions relating to the practical implementation of the National Islands Plan and the Island Communities Impact Assessments. We have left the majority of questions relating to experience to be answered by our members with direct experience of life on the Islands.

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

Any objectives should set out to improve outcomes for island communities. We consider that delivering prosperous, well-connected communities where opportunities and services are available to all should be prioritised. It is SLE's view that supporting a sustainable rural economy and addressing connectivity issues (particularly ferries to the mainland) will be the key to unlocking other positive outcomes for rural communities and that they should therefore be considered among the main objectives of the National Islands Plan.

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

Scottish Government should focus on 'island-proofing' policy in order to achieve National Islands Plan outcomes. As a particular priority, we consider that Scottish Government should focus efforts on supporting island businesses develop capacity, competitiveness and value-added productivity in order to help improve outcomes such as; increasing population levels and improving sustainable economic development.

Connectivity is an essential priority for the Scottish Government to address if it is to improve outcomes for island communities. Improving transport services such as ferry connections to the mainland (and/or other islands) and digital connectivity are essential if island communities are to be mobile and that people living there can access services and employment opportunities easily.

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

SLE considers that the statutory functions of relevant authorities should be taken into account within the National Islands Plan. For example, SNH and Historic Environment Scotland are statutory consultees in the planning system, and we are of the view that these powers will have an impact on the outcomes of the National Islands Plan and should therefore be considered in this context. Given the wide variety of functions of relevant authorities, it is SLEs view that only their core functions should be taken into account in addition to any other statutory functions.

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

Where possible, SLE considers it appropriate for island specific statistics to be gathered in the context of the National Performance Framework. In doing so, these statistics could be used to measure against outcomes in relation to the National Islands Plan. While the National Performance Framework looks across 81 national indicators, we consider they are all relevant to Scotland's islands. It should be within the remit of most relevant authorities to compile required information to contribute to gathering of appropriate statistics for monitoring within the National Framework.

If it is not possible to incorporate island statistics for the National Performance Framework, then a similar model should be adopted in the form of an 'Islands Performance Framework'.

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)

It should be a mixture of all these types of engagement tailored to meet specific circumstances. Not all people have access to internet for online surveys and not all people are able to travel to meetings.

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

SLE considers the main objectives for the Impact Assessments should be to assess the impact of policy which may not be specifically intended for island communities, but which will still impact those communities. By creating an Island Communities Impact Assessment for transport, for example, Scottish Government, local authorities and relevant authorities will be in a better position to "island proof" legislation, policy, strategies and services.

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?

SLE considers the UK Government's [Regulatory impact assessment \(RIA\) template](#) to include some useful parameters to follow. Key areas to be considered in the guidance and templates could include:

- the problem/issue under consideration;
- rationale for intervention;
- policy objective;
- description of options considered;
- monetised and non-monetised costs and benefits of each option (including administrative burden);

- risks and assumptions;
- direct costs and benefits to business;
- wider impact (including any relevant specific impact analysis); and
- summary and preferred option with description of implementation plan.

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

In reviewing decisions relating to relevant authorities the Island Communities Impact Assessment should take particular account of how the decision was made. This could include reporting on the decision-making process in writing, following the parameters as set out in our answer to question 22.