

# **HITRANS** Regional Transport Strategy

'Case for Change' Island Communities Impact Assessment

On behalf of HITRANS Regional Transport Partnership



Project Ref: 330310615 | Date: November 2022



# **Document Control Sheet**

**Project Name: HITRANS Regional Transport Strategy** 

Project Ref: 330610615

Report Title: 'Case for Change' Island Communities Impact Assessment

Date: 1<sup>st</sup> November 2022

	Name	Position	Signature	Date	
Prepared by:	Naomi Bremner	Associate	NB	01/11/22	
Reviewed by:	Stephen Canning	Senior Associate Transport Planner	Stophen Caming	02/11/22	
Approved by:	Stephen Canning	Senior Associate Transport Planner	Stephen Caning	02/11/22	
For and on behalf of Stantec UK Limited					

Revision	Date	Description	Prepared	Reviewed	Approved
v2.0	20/02/23	Amendments following client comments	NB	Stophen Canning	Stophen Caning
FINAL POST CONSULT.	05/07/23	Final report post- consultation	Stophen Canning	Say (at	Stephen Canning

This report has been prepared by Stantec UK Limited ('Stantec') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which Stantec was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). Stantec accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

# Contents

1	Intro	duction	1
	1.1	Overview	1
	1.2	The ICIA Process	3
	1.3	Purpose and Objectives	4
	1.4	Document Structure	4
	1.5	Case for Change Engagement	4
2	Appr	oach to Island Communities Impact Assessment Duties	5
	2.2	Overall Approach	5
	2.3	ICIA Assessment Framework	5
	2.4	Summary of ICIA Evidence Base	6
3	Asse	essment of Island Communities Impact Issues	11
	3.1	Introduction	11
	3.2	Island issues coverage in the 'Case for Change'	11
	3.3	Assessment of RTS Objective	15
	3.4	How has the ICIA informed the Case for Change?	19
4	Next	Steps	20
		mmary of island issues	
Table	e 3.1: Re	eview of Island Issues identified in the Draft RTS Case for Change	12

# 1 Introduction

#### 1.1 Overview

## **Background**

- 1.1.1 Stantec UK Ltd, in partnership with Ecus Ltd and Eyland Skyn, has been commissioned by HITRANS, the Highlands and Islands Transport Partnership, to assist with the preparation of a new Regional Transport Strategy (RTS).
- 1.1.2 HITRANS is the statutory Regional Transport Partnership (RTP) for the Highlands and Islands area of Scotland covering Eilean Siar (Western Isles), Orkney, Highland, Moray and most of the Argyll & Bute area¹. It has a range of functions including production of an RTS, project development / delivery / funding and acting as a key agency in development planning, community planning and promoting economic development. The current HITRANS RTS was first published in 2008. In 2017, HITRANS prepared a refresh of the RTS, the HITRANS Regional Transport Strategy Update, covering a 20-year period. However, a changing policy environment meant that this document was never signed-off by Scottish Ministers, and thus the 2008 Strategy remains current. The RTS is now due for review and revision with work commencing on this process in March 2022.

#### The Island Communities Impact Assessment (ICIA) Process

- 1.1.3 This commission includes undertaking an Island Communities Impact Assessment (ICIA) of the RTS to fulfil the requirements of The Islands (Scotland) Act 2018. The Act places a duty on the Scottish Ministers and other relevant authorities, including Regional Transport Partnerships, to have regard to island communities in exercising their functions.
- 1.1.4 Section 8 of the Act states that relevant authorities must prepare an ICIA in relation to a policy, strategy or service which, in the authority's opinion, is likely to have an effect on island communities which is significantly different from its effect on other communities (including other island communities) in the region in which the authority exercises its functions. These provisions came into force on 23 December 2020.
- 1.1.5 The 2018 Act lists the following areas that are relevant considerations for islands and island communities:
  - Depopulation
  - Economic development
  - Environmental protection
  - Health and wellbeing
  - Community empowerment
  - Transport
  - Digital connectivity
  - Fuel poverty
  - Land management
  - Biodiversity
- 1.1.6 In December 2019, the Scottish Ministers published the first ever National Islands Plan. The Plan sets out 13 strategic objectives which seek to improve the quality of life for island

<sup>&</sup>lt;sup>1</sup> Helensburgh and Lomond fall within the remit of Strathclyde Partnership for Transport

communities. Fairness is a key value that underpins a commitment to equality and human rights. The plan recognises that every member of society has a right to live with dignity and to enjoy high quality public services wherever they live.

## **RTS Case for Change**

- 1.1.7 A three-stage process is being applied to develop a new Draft RTS for the Highlands and Islands:
  - Initial Appraisal: 'Case for Change' (which is the focus of this report): Development of SMART<sup>2</sup> and evidenced-based Transport Planning Objectives (TPOs) and associated proposed RTS Strategic Objectives. This will provide a robust underpinning to the subsequent development and assessment of candidate policies and options for potential inclusion within the emerging RTS. This stage of RTS preparation has involved extensive baseline analysis to identify relevant transport problems and opportunities, and development of associated TPOs.
  - Preliminary Options Appraisal Option Generation, Development and Preliminary STAG Appraisal: Generation, development and iterative appraisal of a long-list of options using integrated Strategic Environmental Assessment (SEA) and STAG criteria (Environment; Climate Change; Health, Safety and Wellbeing; Economy; and Equality and Accessibility) to establish and evaluate reasonable alternative options for potential inclusion within the Draft RTS to achieve the proposed TPOs. SEA, STAG, Equalities Duties and ICIA assessment processes will be integrated to generate a clear audit trail which identifies reasonable alternative options.
  - HITRANS RTS Preparation: The outcome of the appraisal (STAG) stage will be the
    identification of a recommended strategic framework (Vision, Outcomes and Strategic
    Objectives) and corresponding implementation options (policies and proposals) for
    inclusion in the Draft RTS. All selected components will be drawn together to create a
    visionary and engaging Draft RTS.
- 1.1.8 The 'Case for Change' provides a consolidated evidence base to identify the main transport problems experienced within the HITRANS region. In doing so, it seeks to ensure that the RTS reflects the latest understanding of transport and accessibility problems, opportunities and issues in the region, including reflecting travel behaviour changes arising from the COVID-19 pandemic, and through the ICIA approach drawing out relevant and specific islands issues.
- 1.1.9 As detailed further in **Section 3**, the 'Case for Change' includes the identification of relevant TPOs. With reference to applicable island-related issues (discussed in Section 2), this report provides a proportionate assessment of the coverage of key issues within these 'substantive components' of the emerging RTS and thus their likely ICIA impacts. This forms part of a multi-stage appraisal and strategy development process which will include a future consultation on the full Draft RTS and an accompanying Islands Communities Impact Assessment Report and Equalities Duties Report.
- 1.1.10 At this stage in development of the RTS, the 'Case for Change' does not identify individual 'options' (e.g. policies, proposals, actions, schemes and other interventions) or spatially defined schemes but rather forms the starting point for the subsequent development and appraisal of various types of options to achieve the TPOs. All options will be developed, sifted and appraised through Stage 2 Preliminary Options Appraisal of the STAG process. Details of option generation, development, appraisal and how the application of relevant ICIA considerations has informed the selection of options (including consideration of reasonable alternatives) will then be set out in the full Draft RTS and an accompanying full version of the ICIA Report in 2023.

-

<sup>&</sup>lt;sup>2</sup> Specific, Measurable, Attainable, Relevant and Time-Bound

1.1.11 Throughout this report and the ICIA process and assessment, consideration is given to all island areas throughout the region and, further, this consideration is extended to consider similar issues that are as relevant for remote rural mainland areas, which are not covered by the legislation, but which are known to experience transport challenges in keeping with (and in some instances, worse than) those experienced by island communities.

#### 1.2 The ICIA Process

#### Overview

- 1.2.1 The ICIA process is intended to describe the likely significantly different effect of a policy, strategy or service on island communities. It must also assess the extent to which the authority considers that the policy, strategy or service can be developed or delivered in such a manner as to improve or mitigate, for island communities, the outcomes resulting from it.
- 1.2.2 Section 7 of the Islands (Scotland) Act 2018 states that a 'Relevant Authority' must have regard to island communities in carrying out its functions. HITRANS is a 'Relevant Authority' with regards to Section 7(2) of the Islands (Scotland) Act 2018. A related duty in Section 8 of the Act requires relevant public bodies to undertake an Island Communities Impact Assessment "in relation to a policy, strategy, or service which, in the authority's opinion, is likely to have an effect on an island community which is significantly different from its effect on other communities (including other island communities) in the area in which the authority exercises its functions".
- 1.2.3 Section 10 of the Act sets out how a 'Relevant Authority' demonstrates compliance with the duty imposed by section 7:
  - by making such arrangements as it considers appropriate to review any policy, strategy
    or service (as the case may be) which it develops or delivers in carrying out its functions,
    and
  - b. either;
    - i in the case where the authority must prepare an Island Communities Impact Assessment under section 8(1), by preparing that assessment, or
    - ii in any other case, by making such an assessment or taking such other steps as the authority considers appropriate
- 1.2.4 In terms of Section 8 of the Act, in particular: (3) An Island Communities Impact Assessment prepared under subsection (1) must (a) describe the likely significantly different effect of the policy, strategy or service (as the case may be), and (b) assess the extent to which the authority considers that the policy, strategy or service (as the case may be) can be developed or delivered in such a manner as to improve or mitigate, for island communities, the outcomes resulting from it.
- 1.2.5 In the context of the RTS for HITRANS, the ICIA should consider impacts on the islands around the region, to validate that policies and actions contained within the RTS are fit for purpose for all inhabited locations across the HITRANS region, and the ICIA should assist in shaping the RTS implementation plan to address the factors that can disadvantage island communities. The ICIA will hence be used as part of the options appraisal toolkit of the long list of possible RTS interventions, assisting with the development, sorting and refinement of these options.
- 1.2.6 The ICIA will be aligned with the development of the RTS, with a view to screening any potential impacts at an early stage of its development. The ICIA principles will be a key element of the appraisal used to assess the initial long list of RTS options.
- 1.2.7 Through this approach, relevant island duties and an understanding of island issues are being used as tools to inform and embed key island issues within the emerging RTS from the outset, and indeed throughout the development process. In parallel with the wider EqIA and SEA

being carried out for the emerging RTS, this integrated approach allows the environmental, social, and economic implications (with respect to islands in the context of the ICIA) of all strategy components to be tested at the earliest opportunity and for any uncertainties or issues identified during the impact assessment process to be addressed during RTS preparation.

# 1.3 Purpose and Objectives

- 1.3.1 This report has been prepared to help assess the extent to which the 'Case for Change'
  Report addresses relevant island considerations. This forms part of the process of discharging relevant statutory ICIA duties in the preparation of the new RTS.
- 1.3.2 The objectives of this report are to:
  - Assess the coverage of ICIA issues in the 'key issues' identified within the 'Case for Change' report. The key issues include those previously identified in the ICIA Framing Document
  - Assess the extent to which the proposed RTS Objectives address identified key island issues by testing their compatibility with the requirements of applicable ICIA duties through applying an assessment framework and associated guide questions
  - Recommend changes which should be incorporated into the emerging RTS to improve the coverage of island issues and to enhance the ability of the document, and hence subsequent HITRANS activity, to tackle such issues

#### 1.4 Document Structure

- 1.4.1 This report is structured as follows:
  - Section 2: Approach to ICIA Duties: provides an overview of how applicable ICIA duties are being addressed in the development of the emerging RTS, including the assessment framework and evidence base which has informed the work
  - Section 3: Assessment of Island Issues: reports the findings of the consideration of the coverage of island issues within the 'Case for Change' and an initial appraisal of the compatibility of the Draft RTS Objectives against the requirements of the relevant ICIA duties. This includes how the ICIA process has informed the 'Case for Change'
  - Section 4: Next Steps: explains how comments received with respect to the 'Case for Change' and this ICIA Report will be taken into account and how applicable ICIA duties will continue to be applied in future stages of the RTS development process.

## 1.5 Case for Change Engagement

- 1.5.1 As the 'case for change' provides the basis for the RTS overall, it was important to consult on its content with stakeholders and the public at large. To this end, the 'Case for Change' Report, Strategic Environmental Assessment, Equalities Duties Report and Island Communities Impact Assessment were put out to consultation between 27<sup>th</sup> March and 9<sup>th</sup> May 2023. This took the form of: an online-based consultation using ArcStory Map (with paper-based versions available at the HITRANS office) summarising the 'case for change'; publication of the four draft reports which collectively make-up the 'case for change'; and a short online survey.
- 1.5.2 In total, **202** responses to the survey were received, with **181** respondents identifying as a member of the public and **21** as an organisation. The survey results were analysed and have been used to inform the final package of documents which form the 'case for change'.
- 1.5.3 The engagement process validated the findings of the 'Case for Change' and accompanying impact assessment reports, with broad support for the RTS Strategy Objectives upon which the RTS itself will be based.

# 2 Approach to Island Communities Impact Assessment Duties

- 2.1.1 This section outlines the requirements of the Island Communities Impact Assessment duties addressed in this report and details the criteria, which have been set out in a framework, which will be used to iteratively assess all substantive components of the emerging RTS in relation to likely island impacts. This framework aims to provide comprehensive coverage of all key island issues and priorities which should inform RTS development as well as to demonstrate compliance with applicable ICIA duties.
- 2.1.2 A description of the process followed in the consideration of island issues at the 'Case for Change' stage is provided in Section 2.2 to guide understanding of the findings presented later in **Section 3**. Section 2.3 then sets out an overview of the principal requirements of the island duties considered in this report together with a series of 'framing questions' which have been developed to support the consideration of the requirements in the emerging Strategy. Finally, Section 2.4 presents a summary of the evidence base which was set out in the Island Communities Impact Assessment Framing Document, which has also informed the consideration of key island issues in the development of the RTS 'Case for Change'.

# 2.2 Overall Approach

- 2.2.1 The approach to the consideration of islands issues and the key requirements of the relevant duties has involved:
  - Liaison between the transport planning, environmental assessment and island impact assessment teams through the preparation and appraisal of the 'Case for Change'
  - Initial review of the draft 'Case for Change' document to identify the extent of coverage of island issues and to feed back findings and recommendations to the transport planning team for incorporation in the updated 'Case for Change' report. This review included the baseline documentation and analysis of transport issues and problems as well as the draft TPOs
  - Initial assessment of the substantial elements of the updated 'Case for Change' document through consideration of the compatibility of the proposed RTS Strategic Objectives with the island impact assessment framework
  - Reporting of further recommendations in relation to island issues as the RTS
    process continues through the options generation, development and appraisal phase of
    the RTS development

#### 2.3 ICIA Assessment Framework

- 2.3.1 The Islands (Scotland) Act 2018 provides the legal basis for greater decision making at a local level within Scottish island communities and seeks to increase their economic prosperity.
- 2.3.2 This is to be achieved through 'island proofing' legislation, policy and strategic decisions by taking account of the special circumstances of island communities and ensuring no disadvantage to people living and working on islands (as defined by Section 1 of the Act).
- 2.3.3 The following guide questions have been designed to allow for testing the implementation of the ICIA duty. They are intended to provide a transparent framework to assess the extent to which emerging RTS components promote equality of opportunity, including the removal of physical, cultural and informational barriers to accessing and benefiting from the transport system.
  - Will the emerging RTS and its associated delivery mechanisms:
    - o Lead to island impacts that differ from mainland impacts

- o Lead to island impacts that differ from one island to another or any other
- Will the emerging RTS and its associated actions / interventions:
  - Effectively address identified island issues the unique challenges that face island (and remote rural) communities and which vary by island / area
  - o Adequately protect and increase the economic prosperity of islands
  - Address the unique social and health and care challenges faced by island communities
  - Have a positive impact in terms of islands' infrastructure and / or natural environment and biodiversity
- How will any emerging actions / interventions or wider RTS policy:
  - Be developed to manage, mitigate or capitalise upon, for island communities, the outcomes arising from them / it
  - Be delivered to maximise and capture the benefits for island communities arising from them / it

# 2.4 Summary of ICIA Evidence Base

2.4.1 Table 2.1 sets out a summary of key evidence and findings which have been extracted to inform the consideration of island (and remote rural mainland) issues and potential impacts in the coverage of the 'Case for Change' and its preliminary assessment.

Table 2.1: Summary of island issues

Theme	Evidence
	Between 1998 and mid-2020, population has increased in each of Orkney, Moray and Highland, while the population has decreased in Argyll and Bute and in Eilean Siar. The picture over the region as a whole, and considering local authority-wide data however conceals particular issues and challenges for island communities, and notably a very mixed picture whereby some islands, or some parts of islands, have experienced significant growth and others significant decline of population over this same period.  That said, the headline figures are clear and generally consistent in revealing the situation of an <b>ageing population throughout the region</b> , and which is considered to be particularly pronounced in the islands generally and in the smaller islands particularly.
Population	Also, significantly, the real issue of this growth is in fact the corresponding reduction in the proportion of the population of working age that are available to provide the necessary support services for the additional volume of need from the older population; and further then fewer young people and children which can in turn lead to the mothballing or even closure of schools, which accelerates the negative skew in the population characteristics.
	Furthermore, in recent years (and probably accelerated as a result of COVID-19) there has been a trend towards lifestyle in-migration, with generally middle-aged to older people moving to island communities, in areas where housing and / or land is available, often bringing useful skills and application to island life, but also sometimes placing further pressure on services, and increasing house prices to the detriment of local young people for example. Islands such as Skye, Mull, Harris, and islands across Orkney have experienced this to a greater or lesser degree. This also raises and potentially accelerates a tension between desirable population growth and parallel aims to reduce carbon levels. This is an issue for islands and for Scotland more generally, including, and perhaps more so in remote and rural areas, where living is generally more carbon heavy. A consideration for the RTS, in the context of transport being a significant determinant of carbon expenditure, is reconciling these aspects of population growth and progress towards net zero, and therefore the correlation with the policy aim to achieve a 20 per cent reduction in car kilometres.

Theme	Evidence
Poverty	Islands are often seen as a rural idyll and much of the available data backs up this view, with consistently high satisfaction rates whenever island people are interviewed regarding their quality of life on the islands. The <b>lack of visible poverty</b> can make it more difficult to evaluate the true nature of problems however, and therefore the policy and practice necessary to mitigate effectively against the effects becomes less apparent. Much of the island places do not have many / any datazones in the most deprived 20 per cent in Scotland for example, but due to the recognised dispersed pattern of poverty across the islands (in comparison to a more concentrated pattern in more urban areas), there are individuals and families in all areas experiencing multiple deprivation. Limited opportunities and the impacts of poverty can lead to out migration, whereby people could be in extreme poverty if they do not leave. This presents at an island level (e.g., movement within Orkney) and island to mainland level (e.g., people from Bara moving to the Scottish Mainland).
Housing and Land Use	The availability of affordable, fit-for-purpose housing on Scottish islands presents a challenge for island communities. In particular, access to housing affects population decline and influences the decisions of young people to leave or return to island communities. In-migration, as described above, constrains the housing market, and there are particular constraints in the availability of mid-market rents, and with inflation in property prices. This can limit opportunities for existing island residents. Second home ownership across the islands is an issue also in terms of constraints on the availability of accommodation, particularly for young people and essential workers.  In the former crofting counties in the Highlands and Islands of Scotland, which includes much of the Western Isles, Argyll and Sutherland and Caithness, as well as Orkney, the crofting layout means a dispersed pattern of housing, with often single houses linked to an area of land and resulting in population that is spread over large distances, and often with no coherent centre or footpaths connecting people to each other and / or facilities. This land pattern, which is also prevalent across much of the rural HITRANS region, makes it difficult and costly to serve by public transport, which would require to be supported by the relevant local authority. Increasing traffic, from population growth and the increase in visitors to areas (including the increase in domestic tourism since COVID-19) means many routes where people safely walked, wheeled and cycled on the road can now be perceived as unsafe. It can also be often difficult to introduce speed limit reductions over what would be vast areas.  It is also very difficult for people to find new housing or land to build within these communities due to the legislation and protections in place to safeguard the crofting way of life. Furthermore, due to the nature of crofting and the predominance of self-build as a means to provide housing in rural and remote rural areas, it can be challenging for c
Jobs	Island communities can face challenges caused by their remoteness from traditional centres of government and general trade, including relatively expensive transport connectivity and barriers in developing businesses of scale. This can be coupled with physical limitations on the movement of goods, e.g. dangerous goods on ferries, weight limitation of ferries and aircraft, and on-island road network restrictions and limitations.  Island economies have a long-standing traditional reliance on <b>agriculture</b> and <b>fishing</b> . Fishing and <b>aquaculture</b> support a substantial number of businesses and jobs around the region, and especially in the islands. <b>Tourism</b> is a key sector for the region and a growth sector for the islands overall, although it is also a sector which brings its own challenges in terms of accommodating large seasonal variations in demand for getting to / from islands and in terms of on-island services.  The <b>public sector</b> is a major employer across the region, with concentrations of staff in main towns across the islands, but much lesser representation on some of the smaller islands, with main exceptions of school staff, health and care staff, and small roles around the operation of piers, harbours, air services, roads maintenance etc. The transport network therefore becomes essential to delivering key services to these islands. Furthermore, it is highlighted that the challenge remains that islands

Theme	Evidence
	necessitate comprehensive provision of key public services, including transport connections (ferry and air and other services), which are delivered for islands, but with often no personnel or authority based on the islands themselves. This has multiple impacts, firstly the islands do not benefit fully from the economic activity or jobs associated with the operation and management of these services, and secondly, those providing the operation and management of the services can be considered as lacking the lived experience of the circumstances for which they are providing those services.
	Part-time work is much more prevalent in the islands, as are lower wages and higher levels of self-employment. Island economies are also typified by higher levels of underemployment, whereby individuals are more likely to work in lower-paying or lower-skilled jobs than their skills, experience and availability would otherwise suggest. There is also a significant volume of unrecorded work in island communities where residents assist in a family business or at certain times of the year, e.g., lambing season on Lismore.
	Transport (air, road, ferry, bus and other shared transport, active travel and mainland rail services) is of great importance to island communities and is a key factor in the ability of individual residents to, for example, access services and enjoy fundamental human rights.
Infrastructure and	From an island resident perspective, <b>transport and transport services are fundamental cornerstones</b> . In the island context, internal and external air and ferry services provide essential personal, business and supply-chain connections which are simply fundamental to the overall social and economic prosperity of the communities they serve. Indeed, such connections are integral to the very sustainability of such communities.
Transport Services	Poor transport links on, from, to, and between islands, can <b>disadvantage island communities</b> relative to one another and to similar mainland communities. For example, in Orkney, Eday has fewer connections per week to Kirkwall than any of the other Outer North Isles, whilst Eday, Sanday and Stronsay share vessels during refit period, limiting capacity and extending journey times.
	Very <b>low frequency or thin transport networks</b> limit connectivity between islands and the Scottish or island mainland, which also in turn shapes and can limit the supply chain and increases costs to live and do business on islands. There is generally a lack of a guaranteed level of service, which means that communities often do not feel confident to embrace innovation of their service (both transport and other public services) for fear of losing or downgrading the existing service levels / provision.
Costs	The <b>cost of transport</b> within island communities is a significant factor and contributes to an overall higher cost of living relative to other locations. For those living in the isles of Orkney, two transport connections are required to reach the Scottish mainland, which has both cost and time implications. Consequently, and for many other areas across the region, a lack of frequency can lead to additional costs to individuals / and to the cost of doing business, for example, the inability to do a day return adds accommodation costs and lost productivity to a trip. This aspect of additional time (and cost) associated with lack of frequency has been flagged in a variety of studies, including the Skye Air Service Feasibility Study, the case for the Air Discount Scheme, and with respect to access also to healthcare secondary and tertiary services.
Public services	Since the Concordat Agreement of 2007 <sup>3</sup> , funding for, for example, local bus services, marine infrastructure maintenance and replacement etc. has reduced significantly across Scotland and continues to do so.

<sup>3</sup> This concordat set out the terms of a new relationship between the Scottish Government and local government – including rolling up and transferring into the local government settlement a considerable number of specific grants (previously ring fenced) – and updated as part of the agreement reached on the 2010 and 2011 spending reviews and subsequent.

Theme	Evidence
	Rural Scotland, including island areas, has borne the brunt of this decline with the heaviest reliance on subsidised local bus services, marine infrastructure to accommodate ferries etc.
	HITRANS has reported that national funding schemes for local bus services in Scotland often favour urban areas and areas operating with commercial services <sup>4</sup> . Indeed, bespoke research was carried out in relation to the Under-22 Concessionary Travel Scheme launched in January 2022, which specifically highlighted the inequalities faced by island and deep rural communities.
	For many of the islands, a ferry or an air service provides their connection to the nearest town, or local service centre, and as such is the equivalent of a local bus service in a corresponding mainland town or city. Furthermore, for many island communities, there is no connecting bus service to that ferry or air connection or, on larger islands (without the need for a ferry / air connection), no or limited geographical coverage of bus services to the nearest town or service centre. This is the same issue as for much of rural Scotland, in that bus or equivalent ferry, air, train or community transport services are operated thinly or are not available at all. Sometimes, informal arrangements for shared transport are in place, people within communities helping each other out with lifts to shops or to the ferry or air service, but the gaps in organised transport provision can cause isolation and hardship, including if expensive, for example, taxi or informal arrangements are at a cost. A further knock-on impact that is seen is households forced into car ownership in island and rural settings; and in lower income households often a poverty premium situation whereby the car is an older less reliable model that needs replaced more often and is more costly to run.
	Furthermore, there has, in many areas, especially on islands, been significant changes in the provision and availability of health and education services. Provision, or lack of, brings into question the sustainability of an island, and has major impacts on transport and whether or not people can choose to live in that community.
	Young people are vital to the future prosperity of the HITRANS region. The trend is towards an ageing population with fewer young people within island communities.
Young people	From the Highlands and Islands Enterprise (2018) research with young people in the Highlands and Islands <sup>5</sup> , it is flagged that transport underpins access to a wide range of opportunities for young people, as well as others in the region.
	The HIE report further flags the considerable scope to boost opportunities for flexible working with employers, exploiting ongoing measures to extend and improve broadband and mobile coverage, this further motivated through the experiences with the COVID-19 pandemic and the speedy transition to increased working from home practices.
	Due to the nature of islands, across the region a larger proportion of journeys are multi-modal than elsewhere. This might be two or more ferries and connecting private vehicle or public transport services.
Integration	Due to the nature of services (especially air) this might mean not travelling with a private vehicle or having to leave it at one end of the journey, and so the need to connect with onwards public transport or with a car club or all manner of other possibilities. Notwithstanding the issues in terms of thin or absent public transport networks that have been raised above, these multi-modal journeys mean that more so than elsewhere, integration of services is vital. That is frequencies, coordinated timing of services, management and operational arrangements, as well as ticketing and information and service resilience and back-up arrangements. Transport integration is a key everyday concern for the whole community in island settings.

 $<sup>^4\ \</sup>underline{\text{https://hitrans.org.uk/Documents/Rural\_Bus\_Service\_Support\_and\_Funding\_Case\_for\_Change.pdf}$ 

<sup>&</sup>lt;sup>5</sup> Young People Maximising Opportunities (hie.co.uk)

- 2.4.2 In summary, the synthesis of a wide range of issues facing island communities in the HITRANS region has highlighted issues of ageing populations, under-employment, low wages and a seasonal economy, high costs of living, fuel poverty, limited affordable housing, limited transport and digital connectivity, as well as constrained access to essential services for island residents.
- 2.4.3 There are other challenges affecting island economies brought about by geographical location the cost and / or time associated with external transport connectivity to the Central Belt and other key centres, distance to and from markets and suppliers and government centres. The issues and impacts felt at the periphery are often underestimated and poorly understood by the centre.

# 3 Assessment of Island Communities Impact Issues

#### 3.1 Introduction

3.1.1 This section sets out the findings of the initial assessment of the island implications of the RTS 'Case for Change'. The results of the consideration of the coverage of island issues in the draft 'Case for Change' document, and how these were addressed, are set out in Section 3.2. The key issues from the initial compatibility assessments of the 'Case for Change' TPOs are presented in Section 3.3. A summary of the main findings of the ICIA duties assessment at this stage and how they have informed the development of the 'Case for Change' is then presented in Section 3.4.

#### 3.2 Island issues coverage in the 'Case for Change'

## Structure of the 'Case for Change'

- 3.2.1 The draft 'Case for Change' document sets out a comprehensive collation and review of transport-related problems, issues, constraints and opportunities in the HITRANS region. It provides an analysis of the problems with respect to their travel behaviour and transport consequences and defines a series of TPOs. The 'Case for Change' is the first in a three-stage process for the RTS development.
- 3.2.2 Following an introduction, the 'Case for Change' document provides a demographic and socio-economic context (chapter 2), a review of relevant transport policy (chapter 3) and an overview of the transport network, services and their use (chapter 4). The projected future transport and land use context is presented in chapter 5.
- 3.2.3 Chapter 6 then sets out the substantial elements of the initial appraisal which comprise problems analysis from the evidence reviewed and development of TPOs. The 'Case for Change' is centred around an extensive set of 'problems' which the new RTS should respond to, grouped and analysed by transport mode. These specific transport problems were identified through desk-based research and project team analysis in the development of the 'Case for Change'. The TPOs were then derived through consideration of the transport and societal consequences of the problems.
- 3.2.4 Adequate recognition and coverage of identified key island (and remote rural mainland) issues in the suite of problems which are defined in the 'Case for Change' to underpin RTS development is therefore essential to ensure that core island etc. issues and potential impacts are appropriately considered at each stage of RTS development. It also ensures that the problems and associated TPOs respond to a broad range of island etc. issues.

# Review of Island Impacts in the 'Case for Change'

- 3.2.5 A review of the Draft 'Case for Change' Report was undertaken to ensure appropriate coverage of island issues in the development of the evidence base for the RTS. Whilst this was an iterative process (and will continue to evolve), a summary of the key issues identified from this review and how these have been accommodated in the updated report is set out in the table below, to provide a context for discussion on the coverage of island issues in the document.
- 3.2.6 The review process identified the significance of transport connectivity on all island and remote rural mainland communities with respect to wide ranging social and economic aspects and with respect to the provision and experience of the provision of public services and other facilities. The strength of the economy and quality of life in islands and remote rural mainland areas is founded on having an efficient, reliable, accessible, and affordable transport system and network.

Table 3.1: Review of Island Issues identified in the Draft RTS Case for Change

Section of Draft Case for Change	ICIA Recommendation / Comment		How the ICIA Influenced the Case for Change
Section 2 The HITRANS region – Background and Context	Suggest mention and differentiation of different island types, from larger islands with own service centres, to smaller islands the often require travel to a service centre on a neighbouring island or the Scottish mainland.		Incorporated suggestion to include differentiation between island types. Defined the number of islands as "several dozen" as there could be a debate as to whether
	Consider detailing the number of islands in the HITRANS region for context.  Consider also mentioning importance of inbound tourism to islands (and region) in the		it should be all inhabited islands or just those served by a publicly funded ferry or air service. Importance of tourism and the seasonal impacts
Section 2 Population Age Profile and subsequent sections	introductory section.  Would be useful to mention at the start of the TTWA section that for (particularly) the most rural / dispersed TTWA there will be significant averaging affects with the data e.g. on some of the islands in Orkney the 65+ population is over 30% whereas the whole Orkney figure is just 23%.  And similar point subsequently where LA data is used to describe context.  And similarly concerns that are well versed in respect to the IOMD – and consideration that this does not do a very good job at describing deprivation particularly in the islands, where it is understood that deprivation is a far more dispersed issue – worth referencing the various poverty and child poverty action plans across the HITRANS region,	-	now highlighted in the introductory section.  The report now includes a statement about the averaging effects associated with local authority data. Moreover, the point about variations across what is a vast geographic area (and even within smaller authorities) is now brought our more fully.  Issues around the application of SIMD in the HITRANS region are now explained in more detail in a footnote.
Section 2 Healthcare	particularly for the isle authorities where these issue with data are known to exist.  Added more detail in respect to arrangements around primary, secondary and tertiary health care and treatment.	-	A new section on access to healthcare, together with cited and some other examples, now included.
	Suggest some further commentary in respect to challenges around transport access and treatment pathways – some suggestions and examples supplied in comments.  Also issues around matching service design and change with transport constrains and challenges, e.g., service change on Skye and implications in terms of transport to Inverness etc.	-	The issue of matching health service design with transport constraints is also more fully explained, with examples provided.
Section 3 Policy Context	Flag here that the Sustainable Travel Hierarchy does not mention ferry services and air services, which are key elements, and lifeline services (i.e., essential but non-commercial services to communities to support their socio-economic sustainability), for much of the region, in the same way AT and public transport (as shown in the image) are elsewhere in Scotland?  Rework the hierarchy to be suitable for HITRANS region?	•	The omission of air and ferry services from the Sustainable Travel Hierarchy has been described in the text. The Hierarchy has not though been reworked, but the RTS will continue to highlight this inconsistency through option generation, development, appraisal and Strategy drafting.
Section 3 STPR2 lists targeted investment list	Reference to "redesign travel to isolate communities" Suggest this is mostly not 'isolated' islands in the above recommendations, certainly a range from accessible islands to those that are more remote. Need to pick up these	•	Accepted the suggested change - the specific reference here related to Mull, Barra and Harris / North Uist in terms of the proposed fixed links.

Section of Draft Case for Change	ICIA Recommendation / Comment	ı	How the ICIA Influenced the Case for Change
	differential impacts and opportunities in respect to what is referred to in the above, and critically also what is (across HITRANS) excluded from this recommendation.		
Section 3: A Fairer, Greener Scotland: Programme for Government 2022-23	In terms of implications, worth mentioning the flip side of some of this here. For example, the aspect that HITRANS has pushed strongly (and partners) around the U22 scheme being bus only, and for (mainly) islands ferry or air services (or indeed community transport and rail) are the equivalent of bus services in more built-up urban areas, and so omission of these services in the national scheme can be considered unequitable from the perspective of some of that factors that we consider in terms of ICIA.	-	A footnote has been added specifically citing the Under-22 Concessionary Travel Scheme and the issues with it from a HITRANS perspective, referring back to work earlier in 2022. This and similar changes are now incorporated throughout the 'Case for Change'.
Section 4: recent trends	Worth mentioning some variation in this? For e.g., bus travel in Orkney experienced slight increase over this period, rather than the decline experienced most other places. Other variations across the network that the Advisors will be able to describe, particularly from ICIA perspective be useful to pick this up. Various comments through this section asking for evidence or messaging around the variation across the region, especially in respect to any noticeable differences in respect to the islands, and indeed differences between islands / types of islands.	-	Variations within the HITRANS region and at local authority level now highlighted throughout the 'Case for Change'. All further suggested comments have been incorporated, although again trying to achieve a balance between providing the evidence and the requirement for proportionality and brevity.
Section 4.9 Road Network	Focus here on roads that are trunk or trunk equivalent, which therefore places emphasis on particularly mainland areas, and limited consideration of road-based issues of pertinence to the many islands around the region. What about accidents that happen beyond these core routes that have been flagged. Need to mention incidents on the rest of the network, of which there are some notable problem areas. Most of the roads in the region (by length) are beyond these 'trunk' routes.	•	Several new sections of text added to cover this comment, although retaining the strategic focus of the 'Case for Change' overall.
SO 2	Consider explicit mention of islands here, particularly smaller islands that require local, regular access to service centres.	•	As this Strategy Objective is about over-land active travel connections, this is implicit within the towns and villages reference, e.g., Finstown to Kirkwall.
SO 5	Consider emphasis of "from" islands firstly in description to describe the priority of islanders needs in the first instance at the strategic level  Also consider mention in description of close and essential connection with prior objective around public / shared transport. As the priority is about from and to, but also linking that up with around and also connection beyond the islands on the mainland and neighbouring islands.	•	Strategy Objective now references "from" ahead of "to" island. A cross-reference has been added to Strategy Objective 4 to highlight the synergies between SO4 and SO5.

- 3.2.7 Island (and remote rural mainland) issues are well integrated into the Draft 'Case for Change' Report, and the review process has sought to identify opportunities to strengthen the stated understanding and significance of island issues and transport drivers associated with these issues.
- 3.2.8 The findings of the islands' impacts review of the Draft 'Case for Change' Report were incorporated within the document and commentary on the islands' impacts content of the settled version is set out in the following paragraphs.
- 3.2.9 The early chapters of the 'Case for Change' set out the socio-economic and transport baseline, with the focus on identifying key themes, problems, opportunities and issues to underpin the development of RTS objectives, and to guide and frame the subsequent Strategy direction.
- 3.2.10 The sole focus therefore is not merely on islands' issues however a number of themes are evident from the document which have clear implications for both island communities and for remote rural mainland locations. These include:
  - High levels of car ownership across the region (compared with the Scottish average) reflect the predominantly rural character of the region and the dependence of many people on private road transport. The 16% of people without access to a car or van in the region, as well as those in single car / van households (when the single vehicle is tied up with a journey to work for example) are likely to experience greater difficulties (including for other household members) in accessing jobs, training, learning and services. Non-car ownership is typically concurrent with higher levels of deprivation, and levels of deprivation are typically far more dispersed across rural and island areas, than is typically the case in denser more urban areas.
  - Forecast demographic change with fewer people of working age in future which might disadvantage the HITRANS region and its communities through constraints in its labour supply and economic productivity, including in terms of the availability of working age people to provide the care and support that is required by the increase in the old age population across island and rural mainland areas.
  - Access to healthcare is often dependent on car travel or requires very long journeys (distance and time) by public transport (where this is possible) particularly for people living in the islands and especially those living on the smaller islands that require a multileg (and sometimes multi-day) journeys to secondary and tertiary health care provision.
  - The significance of ferry services for island communities across the region is highlighted in chapter 4, including emphasising the mixed function of most services, comprising day-to-day travel and movement of goods focussed on island residents and businesses, and seasonal tourist travel, both by island residents themselves travelling more in the summer and visitors to the islands. Furthermore, the issues of summer demand causing capacity problems on many routes is highlighted, with summer carryings up to five to seven times that of winter. Additionally, many routes suffer as a result of poor service reliability, with aging assets especially, which in turn disrupts the connectivity for island communities, leading to adverse economic and social impacts for island residents and businesses.
  - Chapter 4 also flags the importance of aviation across the region and for island communities, with a mix of commercial and Public Service Obligation (PSO) tendered services, all of which are considered 'lifeline' in nature. The Argyll & Bute and Orkney services are locally contracted PSOs and fulfil the role of a bus service for small islands, meeting a wide range of needs from travel-to-work and education to local authority service delivery on each island.
  - In the discussion on the future transport context, Chapter 5 recognises the challenges of developing public transport solutions to support island and remote and rural places with dispersed and small populations, and flags opportunities for developing the concept of shared mobility, especially in the context of rising costs associated with owning and running a car, and for the islands, the cost of ferry and / or air fares.

- Future transport, land-use planning and economic development including the rapidly changing role of technology offers beneficial opportunities to island (and remote rural mainland) communities, with potentially improved access to services through increased use of technology and the provision of more services closer or at home / within local communities / on islands.
- 3.2.11 These themes are developed in Chapter 6 which sets out a framework of transport problems, characterising them by mode and travel aspects, and supported by data from relevant parts of the evidence base to inform identification of their causes. The transport and societal consequences associated with each problem are then interrogated with reference to transport supply-side causes for each key transport mode, especially relevant in terms of island impacts is the ferry and air services examination.
- 3.2.12 The analysis has taken into account a range of impacts on island issues with respect to ferry and air services, and also wider public transport, active travel and road-based travel problems. These have considered consequences and impacts on people and freight travelling from and to islands in three different outcome scenarios as follows:
  - Negatively affects a journey which is still made by this mode (people and freight)
  - Stops people or goods travelling by more sustainable modes, or their preferred mode
  - Stops people making the trips they'd like to make, or goods being moved
- 3.2.13 Integration of island issues within the problems analysis has informed the development of a set TPOs which articulate the desired outcomes for future transport in the HITRANS region. These objectives reflect key island issues and themes. The narrative underpinning each objective makes clear the reference to island issues.
- 3.2.14 Island issues have been shown to be grounded within the identification of problems and issues considered within the Draft 'Case for Change' Report, and in the subsequent derivation of TPOs. The importance of islands to the nature of the region, and the significance of transport to the social and economic wellbeing of island (and remote rural mainland) communities is evident from the baseline data and analysis prepared, and island issues have been addressed consistently across the transport problems considered.
- 3.2.15 It will be important that the development and testing of options and policies in the next stage of RTS development continues to adopt this integrated and iterative approach to the consideration of island issues, and the assessment and feedback from consultation with island representatives is taken into account.

#### 3.3 Assessment of RTS Objective

#### **Strategy Objectives**

- 3.3.1 Section 6 of the Draft 'Case for Change' Report brings together the transport problems and their associated TPOs. Following input from the islands impacts review (together with other associated review) of the draft document, the proposed objectives are:
  - To make a just transition to a post-carbon and more environmentally sustainable transport network.
  - To transform and provide safe and accessible connections between and within our city, towns and villages, to enable walking, wheeling and cycling for all.
  - To widen access to public and shared transport and improve connectivity within and from / to the region.
  - To improve the quality and integration of public and shared transport within and from / to the region.

- To ensure reliable, resilient, affordable and sustainable connectivity for all from / to our island, peninsular and remote communities.
- To improve the efficiency, safety and resilience of our transport networks for people and freight, and adapt to the impacts of climate change.
- 3.3.2 Subject to feedback from consultation on the 'Case for Change', these Strategy Objectives will be taken forward to underpin the generation of a long list of options and a subsequent appraisal of these options at the next stage of RTS development (see **Section 4**).

# **Islands Impacts Compatibility Assessment Findings**

3.3.3 A summary of the appraisal of the compatibility of the proposed RTS Objectives with the islands impact assessment framework has been undertaken as part of this 'Case for Change' islands impact assessment. This was completed through application at a strategic level of the question set and criteria in the islands impact framework presented in **Section 2** of this report to the emerging RTS Strategy Objectives to ensure the proposed objectives appropriately incorporate islands impacts considerations, and to identify any potential gaps or issues for further consideration in the next stage of the RTS.

Table 3.2: Compatibility of Proposed RTS Objectives with Islands Impact Assessment Framework

Objective	Islands Impacts	Commentary
Strategy Objective 1: To make a just transition to a post-carbon and more environmentally sustainable transport network.	<b>√</b>	This objective has implicit compatibility with the islands impacts assessment framework as actions / interventions associated with this objective will in parallel help to protect the sustainability and prosperity of island places; as well as having a positive impact on islands' infrastructure and the natural environment. Island places can be particularly prone to the consequences of climate change, and so region-wide support for transition to a post-carbon sustainable transport network will help to retain and secure island communities in the longer term. It also presents opportunities for island communities, which have significant renewable energy potential.
Strategy Objective 2: To transform and provide safe and accessible connections between and within our city, towns and villages, to enable walking, wheeling and cycling for all.	√	Safe and accessible connections between and within places is as relevant to island places as it is to mainland locations across the region. It is important to recognise that, for some of our smaller island communities, connections might also include a ferry and / or an air connection, and hence integration with such connections is vital. A tailored and commensurate approach is required for this objective, to ensure that its realisation is meaningfully delivered right across the region, and including from very small (island) communities all the way through to larger communities (either island- or mainland-based). As such, and on this basis, this objective performs well against the island impacts assessment framework.
Strategy Objective 3: To widen access to public and shared transport and improve connectivity within and from / to the region.	✓	This objective performs well with respect to the islands impacts assessment framework – island places often have more limited / no access to public and shared transport, and hence poorer levels of connectivity compared to mainland places – hence a focus on widening access to these (island areas) will ensure the RTS addresses island issues, increases prosperity and supports equitable access to services such as health care.
Strategy Objective 4: To improve the quality and integration of public and shared transport within and from / to the region.	<b>√</b>	This objective performs well with respect to the islands impacts assessment framework – island places (and other remote rural mainland areas) often see poorer quality, older etc. public and shared transport assets, and any moves to improve quality will undoubtedly lead to positive island impacts. Furthermore, islands more often than not rely upon multiple transport services – and so integration is key – and hence any improvement in integration will have positive island impacts. Given the complexity of island transport, the development of interventions will need to be mindful here that benefits for one island are not at the <i>cost</i> of another island(s).
Strategy Objective 5: To ensure reliable, resilient, affordable and sustainable connectivity for all from / to our island, peninsular and remote communities.	<b>√</b> √	This objective is fully congruent with the islands impacts assessment framework, explicitly referencing the need to ensure reliable, resilient, affordable and sustainable connectivity, which matches the issues that have been identified through the evidence gathering phase of the RTS in the 'Case for Change'. Ensuring this connectivity for all from / to our island (and remoter) communities will lead to positive island impacts and will help to address some of the unique challenges that face island communities, and which vary by island / area.
Strategy Objective 6: To improve the efficiency, safety and resilience of our transport networks for people and freight, and adapt to the impacts of climate change.	✓	Efficiency and resilience of transport are issues that have been particularly referenced with respect to connections from / to islands around the region as part of the 'Case for Change' development. This objective therefore offers compatibility with these factors for island connections, supporting these aspects with respect to the island impact assessment framework, and specifically with respect to the unique challenges that face island (and remote rural) communities in pursuit of adequately protecting and increasing economic prosperity, and with respect to addressing the unique social and health and care challenges that are faced.

Objective	Islands Impacts			Commentary
Key				
Clear reference / compatibility	<b>/</b> /	Incompatible	X	
Implicit compatibility	✓	No clear relationship	~	

#### 3.4 How has the ICIA informed the Case for Change?

- 3.4.1 Island issues have been considered throughout and iteratively through the 'Case for Change' to ensure a solid foundation of island consideration issues within the draft report, and which has then been shown to feed through into the formation of the proposed RTS Objectives. The proposed RTS Objectives are congruous in breadth and strength of the representation of island issues as part of the mix with all other issues that have been identified.
- 3.4.2 Preparing this report and the 'Case for Change' concurrently has allowed emerging island issues to inform the final 'Case for Change' Report as published for consultation. In summary, the following aspects are recognised:
  - Comprehensive islands issues evidence base. This report presents a summary of key findings from the island issues evidence base, including the complexity of the data that is available and the identification of averaging affects that often hide the extreme variability of aspects across island areas.
  - Developing the context and evidence base for roads beyond the trunk road network. Recognising that the majority of roads around the region (and particularly on the islands) are local authority roads; understanding that these are required for local access (across all modes, including active travel) and for access to island connections (ferries and air services).
  - Strengthening the understanding around notable island issues the unique challenges that face island (and remote rural mainland) communities, particularly aspects such as access and travel to primary, secondary and tertiary health care, the importance of tourism, and the disconnect between policy such as concessionary travel (e.g. Under 22 Concessionary Travel Scheme) and the availability of connections on which to utilise the concession for islands which in the case of islands (and remote rural mainland areas) is often via a ferry or air (or train) service rather than a bus service.
  - Island issues identified in RTS Strategic Objectives: All six of the proposed RTS Strategic Objectives defined within the 'Case for Change' are of particular relevance to island (and remote rural mainland) places, which will help to ensure that island issues and island differential impacts are considered throughout. Further, TPO5 focusses on key determinants of 'good' transport and connectivity for island communities that is reliable, resilient, affordable and sustainable connectivity, which will ensure that the differential needs of various islands is properly considered through future options generation and appraisal and the RTS development process.
- 3.4.3 This demonstrates that through identifying gaps in the draft document and recommending developments, the ICIA process has positively influenced the preparation of the 'Case for Change'.
- 3.4.4 Following incorporation of the ICIA recommendations summarised above, a formal assessment of the RTS Strategic Objectives in the settled version of the 'Case for Change' was undertaken. The objectives perform well against the islands impacts assessment framework as they incorporate island-focussed aspects throughout, as well as including an island-focussed objective at TPO5.
- 3.4.5 Hence, the 'Case for Change' and RTS Strategic Objectives are considered to be compatible with the ICIA duties and provide an appropriate high-level platform to develop the RTS, including the subsequent steps of generation and appraisal of transport options which will take full account of relevant island issues.

# 4 Next Steps

- 4.1.1 This report is being published for consultation alongside the Case for Change Report to evidence the role of the ICIA as part of the preparation of the new RTS for the HITRANS region.
- 4.1.2 Island issues, and therefore duties associated with The Islands (Scotland) Act 2018, have been considered from the outset of the RTS process, and in parallel with the development of the emerging RTS to ensure key island issues inform the makeup of the new RTS.
- 4.1.3 All consultation received with respect to the 'Case for Change' Report and this ICIA Report will be reviewed and used to inform and (as required) refine the proposed RTS Strategy Objectives and the process of RTS development.
- 4.1.4 The next stage will involve the generation, development and appraisal of individual and packages of options to implement the proposed RTS Strategic Objectives (and thereby address all identified TPOs) through Stage 2 Preliminary Options Appraisal of the STAG process. This will be undertaken in parallel with the application of the Islands Impacts Assessment Framework (as well as the SEA Framework and Equalities Framework) to test and refine all emerging options for potential inclusion within the Draft RTS.
- 4.1.5 Outcomes of the appraisal process will inform the preparation of a full Draft RTS, which will be accompanied by a detailed ICIA Report for consultation.