

**INTERNATIONAL TERRITORIAL LEVELS: CONSULTATION RESPONSE**

Report by Chief Officer, Economic and Community Regeneration

PURPOSE

- 1.1 To seek approval of the Comhairle's response to a Scottish Government consultation on the International Territorial Levels used to produce regional statistics in the UK, and the proposed approach to a concurrent consultation on Small Area Statistics Geographies.

EXECUTIVE SUMMARY

- 2.1 International Territorial Level (ITL) boundaries are geographic boundaries used in the production of statistics in the UK and were created following the UK's withdrawal from the EU in 2020. They currently align with the previous Nomenclature des Unités territoriales statistiques (NUTS) boundaries. ITLs are designed to "balance current administrative boundaries with sensible community geographies so that statisticians can provide evidence that informs public policy and serves the public good".
- 2.2 ITLs are used for a range of statistics including mid-year population estimates and some agricultural statistics. ONS also uses ITL geography when producing UK wide statistics on policy areas reserved to the UK Government. This facilitates comparisons between regions within the UK. The Office for National Statistics has been reviewing these boundaries and the Scottish Government is [consulting on proposed changes](#) with a closing date for responses of 1st October. The proposed changes could have implications for the Outer Hebrides and therefore a Comhairle response is proposed and detailed at Appendix 1.
- 2.3 A parallel consultation is taking place on the [revision of small area statistics geographies: data zones and intermediate zones](#). Data Zones and Intermediate Zones are small area geographies used in the production of official statistics in Scotland and are based on population within a certain area. These were last revised in 2014 and are to be refreshed in light of new population data from the 2022 Census. The potential implications of this require to be spatially examined and are currently being reviewed by the Comhairle's Development Plan team. It is proposed that officers will provide feedback should any of the proposals, once mapped, be significantly incompatible with existing community geographies.

RECOMMENDATIONS

- 3.1 **It is recommended that the Comhairle:**
 - a) **agrees the response to the Scottish Government consultation on International Territorial Levels at Appendix 1; and**
 - b) **agrees the approach to providing feedback to the Scottish Government consultation on small area statistics geographies.**

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Appendix: 1. International Territorial Levels: Proposed Consultation Response
2. Map: ITL3 Regions Existing and Proposed
Background Papers: None

IMPLICATIONS

4.1 The following implications are applicable in terms of the Report.

Resource Implications	Implications/None
Financial	None
Legal	None
Staffing	None
Assets and Property	None
Strategic Implications	Implications/None
Risk	Potential risk to availability / accuracy of data used to inform policy and funding decisions in respect of the Outer Hebrides.
Equalities	None
Corporate Strategy	None
Environmental Impact	None
Consultation	None

BACKGROUND

- 5.1 International Territorial Level (ITL) boundaries are geographic boundaries used in the production of statistics in the UK and were created following the UK's withdrawal from the EU in 2020. The Office for National Statistics has been reviewing these boundaries and Scottish Government is consulting on proposed changes with a closing date for responses of 1st October.
- 5.2 A parallel consultation is taking place on the revision of small area statistics geographies: data zones and intermediate zones. Data Zones and Intermediate Zones are small area geographies used in the production of official statistics in Scotland, and are based on population within a certain area. These were last revised in 2014 and are to be refreshed in light of new population data from the 2022 Census.

DETAIL

Consultation on International Territorial Level Boundaries

- 6.1 The proposed amendments to ITL boundaries contain three changes of relevance to the Outer Hebrides:
1. Alignment of ITL boundaries with those of local authorities.
 2. At ITL2 boundary level, continuation of the 'Highlands and Islands' region but expanded to include all parts of Argyll and Bute. This does not impact on the Outer Hebrides, which already sits within the Highlands and Islands at ITL2 level.
 3. At ITL3 boundary level, the removal of the current sub-regional geographies, of which there are 6 within the Highlands and Islands, including a distinct ITL3 geography for the Outer Hebrides, and the introduction of one Highlands and Islands geography at ITL3 level.
- 6.2 In terms of impact, the first two amendments do not impact on the current position of the Outer Hebrides within the geographic boundaries that are already in place.
- 6.3 The third proposed change is more substantive and has implications for the Outer Hebrides along with other rural and island areas of the Highlands and Islands. The rationale for creating a new Highlands and Islands region at ITL3 level is to rebalance ITL population sizes to allow for national and international comparison. The recommended population size at ITL3 level is between 150,000 to 800,000. for ITL3 150,000 to 800,000. A map showing existing and proposed ITL3 level boundaries in Scotland is at Appendix 2.

- 6.4 While the desire to ensure ITL3 level population levels in Scotland are broadly comparable with other parts of the UK and Europe is valid, there is a risk that removal of a distinct Outer Hebrides ITL3 geography will impact on availability of Outer Hebrides specific data. This in turn may impact on the relevance and value of policy direction and funding decisions for the islands. Other pieces of work, including that around the National Islands Plan, has highlighted that it is already challenging to get meaningful data relating to Scotland's islands. In addition, by being subsumed into a wider Highlands and Islands region for some data purposes, there is a risk that specific issues affecting the Outer Hebrides in terms of economy, transport, fuel poverty, etc., may become lost within a wider Highlands and Islands picture. The consultation response at Appendix 1 therefore proposes that it is the view of the Comhairle that the Outer Hebrides should remain as a distinct geography at ITL3.
- 6.5 These proposals have been discussed recently at the Highlands and Islands Regional Economic Partnership (HIREP) where similar concerns were noted from across the region, and a number of local authorities indicated their intention to respond to the consultation. A HIREP response will also be submitted.

Consultation on Small Area Statistics Geographies

- 6.7 Data Zones and Intermediate Zones are small area geographies used in the production of official statistics in Scotland.
- 6.8 Data Zones serve two main functions in the production of official statistics. Firstly, they provide a standard, stable geography for the production and publication of statistics at a local area on a wide range of topics. Secondly, aggregations of Data Zones can be used to provide estimates for higher level geographies where official statistics might not otherwise be available. Data Zones are produced by aggregating Census Output Areas. Output Areas in turn are produced by aggregating 'frozen' Census postcodes. Data Zones are designed so that they are roughly comparable in population size, with around 500 to 1,000 people.
- 6.9 Intermediate Zones are similar to Data Zones but cover a larger area and population. They are intended to be used to produce local area statistics where statistics cannot be published at Data Zone level due to risk of disclosing sensitive information.
- 6.10 There is a requirement to revise Data Zones and Intermediate Zones because of changes to population and other geographical boundaries since they were last revised in 2014. In particular, the proposed changes have been produced to align with new population data from the 2022 Census.
- 6.11 Currently there are 6,796 Data Zones and 1,279 Intermediate Zones in Scotland. The proposals within the consultation would increase the number of Data Zones to 7,385, and the number of Intermediates Zones to 1,328. There are currently 36 data zones in the Outer Hebrides and 37 are now proposed. There will also be boundary changes to Outer Hebrides data zones as a result of population change and drift. The potential implications of this require to be spatially examined and are currently being reviewed by the Comhairle's Development Plan team. Officers will provide feedback should any of the proposals, once mapped, be significantly incompatible with existing community geographies.

CONCLUSION

- 7.1 The removal of an Outer Hebrides sub-regional geography at ITL3 level could impact on access to, and the usefulness of, some island-specific data. There is a risk that specific issues affecting the Outer Hebrides may become lost within a wider Highlands and Islands picture and reduce the relevance and value of policy direction and funding decisions for the islands.

International Territorial Levels: Proposed Consultation Response.**1. Do you support the principle of changing the ITL2 and ITL3 geographies so that each region is an exact grouping of Local Authorities?**

Yes, agree with the principle that these boundaries should align with local authority geographies. This change does not impact on the Outer Hebrides.

2. Do you support the proposed groupings at the ITL2 level?

Yes, from the Outer Hebrides perspective, this would continue existing arrangements.

3. Do you support the proposed groupings at the ITL3 level?

No, we do not support the proposal to create a new 'Highlands and Islands' region at this level. proposed that it is the view of the Comhairle that the Outer Hebrides should remain as a distinct geography at ITL3.

The desire to ensure ITL3 level population levels in Scotland are broadly comparable with other parts of the UK and Europe is appreciated

However, here is a risk that this will impact on access to Outer Hebrides specific data, which in turn may impact on the relevance and value of policy direction and funding decisions for the islands. Other pieces of work, including that around the National Islands Plan, has highlighted that it is already challenging to get meaningful data relating to Scotland's islands. This approach would appear to further reduce scope for access to certain data at an Outer Hebrides-specific level. In addition, by being subsumed into the wider Highlands and Islands region, there is a risk that specific issues affecting the Outer Hebrides in terms of economy, transport, fuel poverty, etc., may become lost within a wider Highlands and Islands picture.

The proposals also represent duplication at ITL levels 2 and 3, with Highlands & Islands sitting at both levels. This removes distinctiveness between these levels.

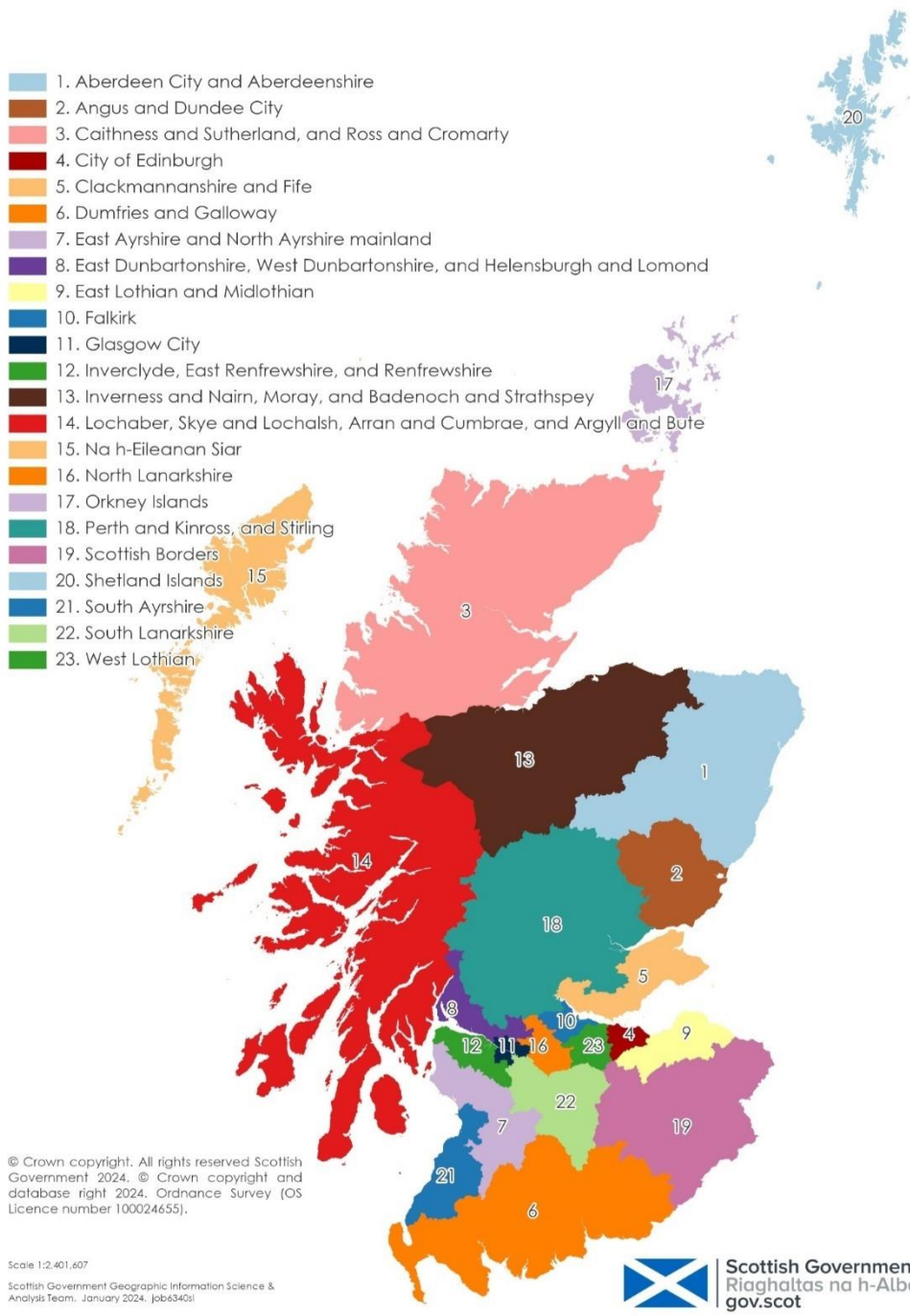
4. Are there specific statistical products that you currently use that would be negatively affected by these proposals?

None have been highlighted to date

5. Do you have any other comments, suggestions, or alternative proposals for the ITL geographies?

An Islands Community Impact Assessment has not been published alongside these proposals and would have picked up some of the issues identified through this consultation response. The Scottish Government's National Islands Plan has identified the need for good data and measurable indicators that can assess the extent to which outcomes for island communities are improved. These proposals would seem to detract from availability of good, island-specific, data. The proposals potentially undermine movement towards place-based policies and legislation, which require a good underlying evidence base to demonstrate need and impact.

Existing ITL3 Regions and Proposed Amendments



- 1. Aberdeen City and Aberdeenshire
- 2. Angus and Dundee City
- 3. City of Edinburgh
- 4. Clackmannanshire and Fife
- 5. Dumfries and Galloway
- 6. East and West Dunbartonshire
- 7. East Lothian and Midlothian
- 8. Falkirk
- 9. Glasgow City
- 10. Highlands and Islands
- 11. Inverclyde, East Renfrewshire, and Renfrewshire
- 12. North and East Ayrshire
- 13. North Lanarkshire
- 14. Perth and Kinross, and Stirling
- 15. Scottish Borders
- 16. South Ayrshire
- 17. South Lanarkshire
- 18. West Lothian

