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RESEARCH

Dealing with island particularity: place-based governance for small North Sea islands

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Abstract

Islands are neither homogenous nor uniform. They are plural and diverse microcosms of the wider societies and relational networks within which they are situated. Small islands may be comparatively less accessible in physical terms but tend to have a strong presence in the popular imagination, often because of their perceived remoteness and status as 'places apart'. Neighbouring islands within an archipelago are often found to have distinct characters, reflecting locally-specific social, cultural and environmental dynamics. Islands are thus both ordinary and extraordinary places (see Robinson 2006). As a consequence of their distinctive island particularity, islands tend to face specific sets of governance challenges but can also become loci for innovation and transformative change. Many challenges faced by small islands related to accessibility, seasonality, infrastructure and service provision are shared by mainland rural communities but are placed in sharper focus and can have more significant and long-lasting implications within an island context. The location of islands at the boundary of the terrestrial and maritime further presents a challenge to sectorally organised governance systems. It is increasingly evident that local, place-specific solutions are required, which require a degree of flexibility within the scope of established institutional arrangements. We distinguish between two dimensions of place-based governance - place identity (fluid, contested and subject to reconfiguration) and strategic positioning, whereby governance actors try to position or frame their island within a wider geographical context as a response to governance challenges. We examine current approaches to addressing island particularity in national and regional policy, and opportunities for developing innovative place-based approaches. We draw on exploratory comparative case studies of small North Sea islands in Germany (Hallig islands, Schleswig-Holstein), the Netherlands (Schiermonnikoog) and Sweden (Koster islands), focussing specifically on the scope for place-based governance and strategic positioning within the specific contexts of each national system of public administration.

Keywords Islandness · Relationality · Governance · Place-based · Multilevel

Introduction

The North Sea is becoming an increasingly crowded space, characterised as a frontier for a new wave of marine industrialisation and ongoing unsustainable exploitation of both living and mineral resources (Halpern et al. 2008; Emeis et al. 2015; Mallin and Barbesgaard 2020). Simultaneously, we see increased awareness of, and policy attention paid to marine conservation, with ambitious calls for the designation of extensive protected areas and the active restoration of coastal and marine ecosystems (e.g. van Tatenhove et al. 2021; Hermoso et al. 2022). Low-lying coasts and nearshore islands[1] have become the focus of flood protection

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[1] We use the term 'nearshore' to refer to small islands located within territorial waters, excluding both inland islands (lakes and rivers) and

and climate adaptation measures, as the impacts of anthropogenic climate change and sea-level rise are experienced first-hand. The North Sea, furthermore, has increasingly become a planned and regulated space, characterised by a multiplicity of area-based and sectoral policies and regulations at both national and supranational spatial scales (Wright 2015; Spijkerboer et al. 2020; Walsh et al. 2024).

To date, small islands have received limited attention in the context of the above developments, particularly in the European context. Despite calls for a cohesive and coherent approach to spatial planning across the land-sea interface (e.g. Kidd et al. 2019), small islands barely feature in current scientific and policy debates on maritime spatial planning. Similarly, island communities have struggled to have their voices heard in debates on fisheries regulation (Brennan 2022). Islands, in the popular imagination, continue to be perceived as sites of stability rather than transformation, perhaps even as bulwarks of tradition and community-based resilience in the face of global societal and environmental crises. Indeed, as sites of consumption for millions of tourist visitors each year, the popular image of North Sea islands is not incidental but the product of concerted effort. Islands evidently occupy a particular place in the context of the developments described above, and one that is in some ways distinct from rural areas on the coast. It is long recognised that islands face specific sets of challenges related to reduced accessibility, small, and in some cases, declining populations, economies of scale and additional costs associated with infrastructure and service provision (e.g. ESPON 2011, Fernandes and Pinho 2017). Indeed, islands receive specific mention in the foundational treaties of the European Union, as a category of places, alongside mountains and sparsely populated rural areas, that tend to experience socio-economic disadvantages due to physical and demographic factors.

In this paper, we contend that small islands in northwest Europe continue to face specific sets of governance challenges despite the advances in connectivity brought about by the information and communication technology revolution of the past three decades. We are specifically concerned with governance responses to challenges associated with what we term island *particularity*. The particularity of islands is, in our understanding, the product of both material and discursive factors relating to both the physical characteristics of small islands, and their perception as distinct places set apart from mainland society (see also Hay 2013). We are concerned, firstly, with the question of how island particularity is, and can be, addressed in national legislative and policy frameworks and, secondly, with the prospects for place-based governance as a response to island particularity emerging from island communities themselves. Our study draws on a comparative analysis of current governance practices on small islands across the North Sea region. It is explorative in scope, setting out issues that have not received adequate attention to date and concludes with the identification of potential pathways for future research.

The particularity of Islands

Small islands are frequently considered remote and peripheral (Baldacchino 2004; Gillis 2004). They tend to be located at a distance from larger centres of population and can generally only be reached by ferry, aeroplane or helicopter. Indeed, islands with fixed connections to the mainland are often excluded from island classifications, so some degree of remoteness or reduced physical accessibility would seem to be a defining criterion. It is, however, increasingly recognised that the association of small islands with remoteness and peripherality is far from absolute or predetermined but conditional on the perspective of the observer and highly variable across both space and time. Indeed, there are many examples of small islands and archipelagos in northwestern Europe which were significantly less peripheral in past centuries than they are today (see Gange 2019; Rennie 2020; Burnett et al. 2021). Maritime networks of trade, knowledge and cultural exchange were central to a flourishing Hiberno-Scottish sea-faring culture in the early Middle Ages and the success of the Hanseatic League (twelfth to fifteenth centuries). The geographies of many North Sea islanders of the seventeenth and eighteenth centuries extended to Greenland and Canada on the back of the lucrative whale trade, whereas connections to the nearby 'mainland' were much more limited. As the relative importance of maritime trade and industry to modern European societies has receded and harbour activities have become increasingly concentrated at a small number of locations, perceptions of islands and the coast have shifted from places of production to places of consumption (Hall and Page 2014). Indeed, island peripherality may be considered from this vantage point a modern invention, the product of histories told from the perspective of the metropolitan present (Gange 2019). Similarly, contemporary associations of smallness with vulnerability and isolation may be contrasted with both historical and non-western perspectives that emphasise continuity and relational connectivity across the land-sea boundary (Oliver 2021; Foley et al. 2023).

From a contemporary perspective, it is, furthermore, increasingly evident that the relative importance of physical

islands located within Exclusive Economic Zones at a greater distance from shore (e.g. Helgoland (DE) or Fair Isle (UK). Note, that in some national policies (e.g. Ireland) the term 'offshore islands' is used to refer to nearshore islands as described above. For consistency we use the terms nearshore or small islands throughout.

accessibility has declined in recent decades and given way to what many commentators have proclaimed as a new age of digital connectivity. Whereas physical distance undoubtedly continues to play a significant role in both economic and social interactions, it is clear that long-established and taken-for-granted geographies of core and periphery have become radically reconfigured. These developments, however, concern not only small islands but also rural areas more generally, leading rural scholars to consider the ways in which rural areas are embedded in and contribute to the shaping of global relational geographies (McCarthy 2008; Gkartzios et al. 2022). The distinctiveness of islands, thus, does not rest on their peripherality or reduced physical accessibility. Indeed, it may be argued that small islands have occupied a comparatively prominent position in popular imaginaries, particularly in Western Europe. Perhaps paradoxically, their strong presence in the popular imagination and national and regional discourses of place is in part founded on their perceived remoteness and status as 'places apart' (Gillis 2004; Otto 2018; Ronström 2021; Prokic and Simkova 2024). Burnett et al. (2021) describe this phenomenon in terms of the 'lure' of islands and suggest that remoteness in the form of 'exotification' continues to persist, presenting economic opportunities for island communities that are unlikely to be available to similarly sized rural places on the mainland (Burnett et al. 2021, p. 5). That what makes islands distinctive is subject to ongoing creative reinterpretation and inevitably reflects the diverse perceptions of both locals and visitors and their internal contradictions. Following Stratford et al. (2011, 124) and Hay (2013) we are furthermore recognise that any consideration of island particularity cannot focus solely on how islands are viewed from the mainland but take account of a broader range of geographical relations; 'island-mainland', 'island-sea' and 'island-island'. In summary, 'islandness' is a contested social construct, political imaginary or sense of identity informed by both local and global discourses and manifested through situated practices embedded in specific place-based contexts (Randall 2021; Foley et al. 2023). Physical characteristics of smallness, boundedness and relative physical isolation do play a role, but in combination with other sociocultural discursive factors.

Governance and island particularity

As a consequence of their distinctive island particularity, islands face specific sets of governance challenges. Specific challenges include issues related to accessibility, infrastructure and service provision that pertain to both the small size of island communities and difficulties in achieving economies of scale, as well as to the comparatively higher costs associated with the transportation of goods and people to and from an island location (ESPON 2011, Haase and Maier 2021). In addition, many small islands in the European context face challenges associated with tourism management, from pronounced seasonality in the demand for both private and public services (e.g. Gonzales Perez et al. 2020) to second home ownership and housing affordability for year-round residents (e.g. Desmond & O' Sullivan 2024). At the same time, islands can become nuclei of innovation and frontrunners in societal transformation, in part due to the need to find local, place-based solutions that make sense in an island context (e.g. Watts 2019, Skjolsvold et al. 2020).

The scientific literature on island governance, has to date, focussed primarily on issues of territorial autonomy and the capacity of islands to govern themselves (e.g. Baldacchino & Milne 2006, Hepburn 2012; Alberti and Goujon 2020). While significant, this issue reflects only one dimension of island governance. There is a specific need for detailed analysis of the role of islands within complex multi-level governance contexts as found in Europe. Small European islands vary considerably in their degree of autonomy within national governance systems. Whereas some island communities form their own municipalities and/or are part of island regions, others are part of much larger municipalities. Some European countries have national island strategies, policies or legislation, while others do not explicitly recognise the particularity of islands in policy or legislative terms. The study of Haase and Maier (2021), prepared for the European Parliament makes general recommendations with regard to high-level policies that can, in their view, contribute to the challenges faced by small islands. They do not, however, consider the processes through which EU and national policies filter through governance systems to influence decision-making and resourcing at the micro-scale of individual islands.

In the following we seek to address this gap. We outline a nuanced multilevel governance perspective that emphasises the role of both formal regulations and informal processes and cross-scalar relational connections. We are specifically concerned with the potential for multilevel place-based governance to address challenges associated with island particularity. Our understanding of multilevel governance is informed by constructivist geographical perspectives on Europeanisation, which emphasise how territory and scale are articulated, projected and negotiated through complex cross-scalar institutional arenas (see Clark and Jones 2009, 2013). Rather than providing a passive backdrop or container for governance actions, space and spatiality are understood to be produced through governance relations that cross scales, often confounding a neat separation between local, regional, national and supranational governance levels. Within this context, European island policies

may be conceptualised as occurring within transnational spaces, where discursive practices, policy principles and place-based identities associated with a broad range of spatial scales interact. At the same time, we recognise and indeed are keen to highlight the constraints presented by the vertically integrated structures of modern systems of public administration to cross-scalar and cross-sectoral governance practices.

In general terms, governance may be defined to encompass all processes through which collective affairs are managed in society, typically through combinations of hierarchical, market and network forms of regulation (see Healey 2006a, b). More specifically, governance can be understood as the cumulative outcome of intentional and non-intentional interactions between governing actors (Kooiman 2003). This theorisation of governance highlights the complexity of processes of governance in society and the extent to which a multiplicity of governing actions (broadly understood as practices which seek to manage collective affairs in society) interact with each other, with the consequence that the specific outcomes of governance activity may be difficult to ascertain or predict in advance. Indeed, a fragmentation of governance tasks and activities across a wide range of public and private sector agencies is recognised as a characteristic feature of shifts in the practice of governance over the last thirty years or more (Healey et al. 2002; Elliot et al. 2022). This phenomenon of fragmentation has led governance scholars to challenge traditional notions of the state as a unitary actor (Rhodes 1997). Rather, governance occurs in multiple institutional arenas, differentiated from each other in terms of their strategies, discourses and practices. Institutional and interpretative accounts of governance furthermore shift the focus from the study of governance systems in the abstract to the context-specific analysis of governance practices (Healey 2006a, b; Wagenaar et al. 2014, Lippert et al. 2015; Walsh and Kannen 2019). We suggest that this perspective on governance, as messy, fragmented and times unpredictable, is very relevant to progressing our understanding of island governance as a complex, multi-level process. Although, the popular imaginary of islands as small self-contained communities persists, the task of joining up the dots across policy areas to create a cohesive strategy constitutes a formidable challenge.

Small islands are influenced by a wide range of both area-based and sectoral policies originating at multiple geographical scales, from the municipal to the transnational. In many respects, island communities are policy-takers rather than policy-makers, with limited scope to diverge from the regulatory frameworks and sectoral programmes established at higher scales. The location of nearshore islands at the boundary of the terrestrial and the marine further presents a challenge to sectorally organised governance systems and adds an additional layer of complexity to any consideration of island governance (O' Hagan et al. 2020, Howells and Ramirez-Monsalve 2022). Individual island governance practices and trajectories are influenced by both formal institutional arrangements as well as national governance cultures and local community dynamics. Island governance is thus the product of both island-specific and generic policies and programmes that may be area-based or follow a sectoral organisational logic.

The proliferation of cross-sectoral and area- or community-based modes of local governance notwithstanding, the dominant mode of working for municipal governments in much of northwestern Europe continues to reflect many of the features that have come to be associated with Weberian or neo-Weberian public administration (see e.g. Byrkjeflot and Engelstad 2018). These include clear organisational structures (typically vertically integrated hierarchies), clearly outlined competences and responsibilities, a reliance on established rules and procedures including standard frameworks for decision-making, and an emphasis on consistency, reliability and predictability in government operations. Significantly, the Weberian system places emphasis on ensuring uniformity in the application of policies and regulations. Weberian systems of public administration are thus well-suited to delivering many of the core tasks of local government, including the provision of necessary infrastructure and public services. The corollary of the above principles is, however, that Weberian systems are typically less flexible in their capacity to respond to particular circumstances, whether in the form of unexpected events (e.g. a financial crash or natural disaster) or the particular challenges faced by small islands due to their size and reduced physical accessibility (see Tijsma et al. 2024).

Building place-based governance capacity

It will be clear from the discussion above that the question of particularity represents both a challenge and an opportunity for the governance of small islands. In practical terms, islands face distinct sets of challenges pertaining to their material circumstances. At an ideational level, islands can and do benefit significantly from their place-based identity and sense of attachment that both residents and visitors often experience in relation to small islands. Islands provide fertile ground for governance capacity-building, based on the articulation and negotiation of a collective sense of place. Governance capacity can be understood in terms of the material, cognitive, social and normative resources required to deliver effective governance (Healey 1998; Wyborn 2015). In the following, we focus primarily on integrative governance capacity. From a planning theory perspective,

governance capacity-building is understood to be central to processes of proactive and deliberate place-making. It is concerned with the development of governance cultures or ways of working that are conducive to collaborative action (Healey 2006a, b).

The integrative dimension of governance capacity is specifically concerned with making connections across diverse sets of actors (i.e. public, private, civil society, research actors), diverse knowledge forms and systems (i.e. scientific, professional, experiential and traditional) and diverse value systems (e.g. with respect to nature, cultural heritage or socio-economic development goals) (van der Molden 2018). From this perspective, building integrative governance capacity cannot be considered solely as a rational-technical exercise but as comprising the building of relational networks and a commitment to an ethos and practice of critical pluralism. The latter implies the capacity to acknowledge, engage with, and critically reflect on multiple, diverse perspectives on a phenomenon, recognising the positionality of individual standpoints and knowledge claims (Williams 2014, 2018; Walsh and Döring 2018). Previous studies indicate that axiological (concerned with values and normative foundations), epistemological (concerned with the status of different forms of knowledge), and ontological (concerned with questions of what is real and what is perceived) pluralism are mutually constitutive (Walsh 2021a). Applied to the question of island particularity, a commitment to critical pluralism implies an acknowledgement of open dialogue on the meaning of place, both at the level of the island as a whole and with respect to more localised places on the island. This implies, for example, recognising place qualities as the product of both material and ideational aspects and the collective meanings associated with particular places as fluid, contested and potentially contradictory, rather than reflective of an authentic, fixed or insular sense of place.

We distinguish between two dimensions of place-based governance. The first is concerned with *place-based identity and place-branding*. Local sense of place can be viewed as a form of 'capital', a resource which both islanders and visitors draw on. It is integral to processes of meaning-making, both individual and collective and is informed by underlying situated spatial imaginaries, some of which may have long historical traces (Gee and Siedschlag 2019). Local, situated understandings of place, influence how external processes of change (e.g. climate change or globalisation) are interpreted and given meaning in a local context (e.g. Walsh et al 2018, Döring et al. 2022). Place identity may become instrumentalised through deliberate marketing and branding exercises with particular images and narratives of place (e.g. islands as authentic close-knit communities with a special relationship to their natural environment) being articulated for specific purposes (e.g. Oliviera 2015). Place identity must, thus be understood as constructed, contingent, and contested, subject to processes of negotiation, stabilisation and reconfiguration over time, rather than as an essential or foundational attribute of a geographical location or cultural group. We view place-based identity as multifaceted, concerned with relationships between islands and the 'mainland' (however defined), evolving relationships with the sea and relations between islands either within an archipelago or a broad transnational spatial context (Table 1).

Our second dimension is concerned with *strategic positioning*. We recognise that islands are subject to processes of negotiated positioning, whereby governance actors seek to place, position, or frame their island within a wider geographical context. The concept of strategic positioning, building on spatial planning scholarship (e.g., Albrechts et al. 2003; Healey 2006b), concerns the relational and multilevel nature of contemporary governance practices. Deliberate processes of multi-actor spatial strategy-making are instrumental to both the articulation and framing of place-based identities in policy terms as well as the strategic positioning local places within wider geographical contexts. Such spatial strategies may emerge from planning processes (see e.g., Albrechts et al. 2003; Walsh 2021b) but may also be the product of other governance contexts such as protected area management, which can be interpreted as a form of place-making (Williams 2018; Walsh 2021a, 2025). Strategic positioning is primarily concerned with the embedding of islands in multi-scalar governance processes and may incorporate and reflect elements of island-mainland, island-sea and / or island-island relations. In Table 1 we illustrate the intersection of island spatialities and place-based governance dimensions by of examples. In this paper, we deliberately focus on the relational aspects of place-based identity construction and strategic positioning, which have received comparatively little attention to date.

Table 1 A conceptual framework for the analysis of Place-Based Island governance, with illustrative examples

	Place-based identity	Strategic positioning
Island-mainland relations	e.g. negotiating local and visitor perceptions of islandness	e.g. ensuring official recognition of island particularity in national policies or legislation.
Island-sea relations	e.g. shifting connections with the sea, as resource base, blue economy space of opportunities or vulnerable ecosystem	e.g. incorporation of island perspectives within processes of maritime spatial planning.
Island-Island relations	e.g. perceptions of neighbourliness, rivalry or competition	e.g. development of archipelago thinking, identification of common interests at regional and transnational levels

Island policies and governance in northern and western Europe

Islands receive particular attention in Article 174 of the Treaty on the Functioning of the European Union (European Union 2012) in the context of territorial cohesion. The EU aims to reduce 'disparities between the levels of development' at a regional level and to reduce the 'backwardness' of 'least favoured regions'. The specific circumstances of certain categories of areas that are perceived to be characterised by physical and/or long-term disadvantage is highlighted: "Particular attention shall be paid to rural areas, areas affected by industrial transition, and regions which suffer from severe and permanent natural or demographic handicaps such as the northernmost regions with very low population density and island, cross-border and mountain regions". Here, island regions are given specific mention in this list of what have become known as regions with 'specific geographical features' or 'geographical specificities' (EU [2009] 2016, Monfort 2009). This categorisation of island regions as 'backward' is, however, problematic, given the strong economic performance of many island economies (see ESPON 2019) and the limitations of statistical socioeconomic indicators such as GDP. Moreover, the EU texts make reference to island regions only, rather than islands, per se. As a consequence, many small European islands are not explicitly considered. For example, according to Monfort (2009, 4) "Island regions are usually defined as regions having a substantial part of their population living on islands or a large fraction of their territory covered by islands. For analysis purposes, island regions are defined as NUTS3 regions completely covered by islands" (see also ESPON 2011). Regional islands are members of the Islands Commission of the Conference of Peripheral Maritime Regions of Europe (CPMR), a grouping of twenty-three regional island authorities, with a population of approximately 15 million people, located in the Mediterranean and Baltic Seas, and the Atlantic, Indian and Pacific Oceans (EU overseas territories). Small islands in the European context, are typically defined as those with a population of less than 5,000 that do not have a bridge connection to the mainland (ESPON 2011, Haase and Maier 2021).

The degree of recognition of island particularity in national governance systems varies greatly across Northern and Western Europe. While some countries do not make any formal legislative or policy distinction between island and mainland communities or municipalities (e.g., Denmark, Germany, Sweden), others have introduced national legislative frameworks or mechanisms (Finland, Scotland, the Netherlands) or alternatively, non-binding strategic policies (Ireland). The Small Islands Committee of the Danish Parliament provides a political forum to address issues affecting small islands in Denmark. National associations of small islands have formed in a number of European countries. These organisations, allow island communities to address and give voice to common challenges and issues. The small island associations of Denmark and Sweden were formed in the 1970s, following reforms of local public administration, whereby small island municipalities 'lost their independence' and were amalgamated with larger, mainland communal structures (*Sammenslutningen af Danske Småøer*, n.d., interview). In these cases, the primary goal was to maintain a viable population on the islands. In 2001, six national organisations came together to form the European Small Islands Network (ESIN), a forum for exchange and cooperation among small islands in Denmark, Finland, France, Ireland, Scotland and Sweden. This network has subsequently evolved to become the European Small Islands Federation with more formalised structures. It has also increased its membership and geographic coverage substantially with the inclusion of Estonian, Italian, Greek and Croatian island associations as well as the semi-autonomous Aland islands.

Finland became in 1981, the first European state to introduce national island legislation, the outcome of a process begun in 1949 with the appointment by government of an Archipelago Committee, tasked with investigating the specific challenges faced by island communities and to make recommendations for their improvement (Kuusisto & Leppänen 2018). The 'Act on the Promotion of the Development of the Archipelago' sought to ensure that there are 'sufficient opportunities' providing for livelihoods, mobility and access to basic services for island communities, as well as securing the protection of island landscapes. Among other provisions, access to basic services is to be ensured at a reasonable cost and at a reasonable distance, and efforts are to be made to boost and secure public sector employment on the islands. The Act, followed a period of administrative reform whereby the number of municipalities nationally declined from 547 in 1955 to 464 in 1977, and many island municipalities were merged or amalgamated (Council of Europe 2009). It remains current today. More recently, both the Netherlands and Scotland have, independently of each other, introduced legislative provisions for island-proofing, a mechanism for the assessment of national and/or regional policies to ensure that the specific context of islands is taken into account. The Scottish Islands Act (2018) emerged from the efforts of island communities and their associations to ensure that the needs and status of islands were clearly recognised in (a potentially independent) Scotland (Sindico and Crook 2021). The principle of 'islands proofing' was first set out in the UK context in a policy document entitled 'A Framework for the Islands', prepared by the three Scottish island councils (municipalities) in conjunction with the

UK government and adopted by the Scottish government in 2014. Under this principle, policy and legislation must take into account the specific circumstances of the islands and should be adjusted accordingly (UK Government and the Three Island Councils 2014, Sindico and Crook 2021). Significantly, the islands proofing process is intended to be collaborative, requiring the active support of the island councils and their knowledge of local circumstances. The Scottish Islands Act (2018) subsequently provided the legislative basis for island-proofing. Specific measures include the requirement to produce a National Islands Plan, and the introduction of island communities impact assessments as a means for assessing the likely impacts of individual policies. Such assessments are conducted by the authority responsible for the policy in question.

Legislative provisions for island-proofing in the Netherlands originated with a motion submitted by a member of parliament from the province of Fryslan in 2008. He called for future regulations to be subject to a 'Wadden test', to assess whether these regulations could have a disproportionately negative effect on the Wadden islands. This motion was adopted in amended form by the second chamber (lower house) of the national parliament. The 'Wadden test', principle has since been incorporated in cooperation agreements between the Wadden island municipalities, the provinces of Fryslan and North Holland and the Ministry of Interior and Kingdom Relations (*Tweete Kammer* 2020). Its operation in practice, however, is dependent on the proactive initiative of the islands and their representative organisations, challenging individual regulations on a case-by-case basis. In the case of Ireland, a national policy framework 'Our Living islands' was published in 2023 and adopted by parliament (Government of Ireland 2023). It outlines strategic objectives for the revitalization of small islands. Although led by one ministry, the Department of Rural and Community Development, the document takes an explicitly 'whole of government' approach. Concrete actions are outlined in an accompanying 'Action Plan' with a three-year timeframe. To date, however, the policy framework lacks alignment with explicit budgetary commitments and the necessary legislative support to ensure implementation.

Comparative case studies

In the following, we examine three case studies to assess how island particularity is, addressed in specific national legislative and policy frameworks and, explore the prospects for place-based governance as a response to island particularity. The case studies are selected to illustrate contemporary governance challenges and practices on small nearshore islands in the North Sea (Fig. 1). The case studies take the form of exploratory vignettes, providing relevant insights and an indication of potential pathways for more in-depth comparative research. The case studies serve an exploratory purpose, informed by an inductive approach to case study research that seeks to highlight situated, contingent practices embedded in specific geographical contexts (Walsh and Allin 2012). The individual cases were selected to illustrate the diversity of governance arrangements for small islands and place-based governance strategies found in the northwest European context, while being wary of any connation of good or best practice (see Booth 2011; Tubridy et al. 2022). Consequently, cases where island and municipal boundaries converge (Schiermonnikoog, Hallig islands) and diverge (Koster islands) are included. Similarly, cases both with and without national island policies, or their equivalents, are included. The Interreg North Sea FREIIA[2] project (2022–2025) provided the overall framework within which the research was conducted. This study thus does not comprise a comprehensive assessment of island policies. Rather, as outlined below, we anticipate that this study will provide a point of departure for further cross-comparative analysis.

The research is informed by an interpretative policy analysis approach aligned with the constructivist research conceptual framing presented in Sect. 2 (see Wagenaar et al. 2014). Specifically, the empirical work comprised reviews of relevant policies and plans, a small number of interviews (five) with local governance actors, representatives of regional small island partnership associations and the European Small Islands Federation (ESIN) and, in the case of the Koster islands, governance workshops and site visits focused on specific challenges (primary education and seasonality). Documents in Swedish and Dutch were translated to English with the aid of professional translation software. In each of the three cases (Koster islands in Sweden, Schiermonnikoog in the Netherlands and the Hallig islands in Germany), protected area management designations (national parks in Koster and Schiermonnikoog, a biosphere reserve and neighbouring national park in the case of the Halligs) have played a significant role in the negotiation and shaping of place-based island identity.

The Koster islands (SE): finding a space for action between community engagement and formal structures

The Koster islands are located in the municipality of Strömstad in Västra Götaland county at the Skagerrak (North Sea) coast of Sweden. Koster has a resident population of approximately 300 and a land area of 12 km^2. This corresponds to approx. 2.3% of the total population of the municipality and

[2] Facilitating Resilience Embracing Island Innovation.

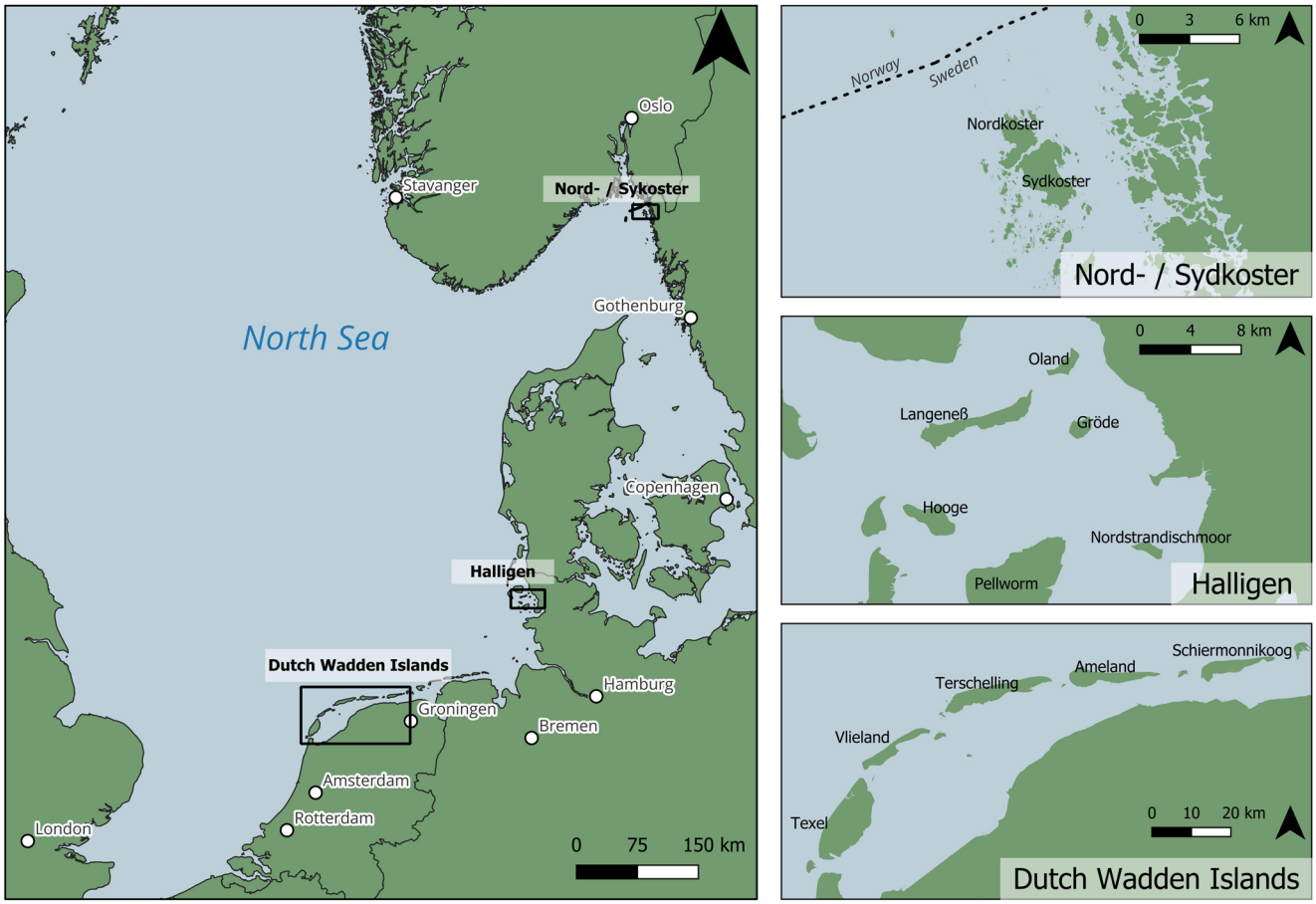

Fig. 1 The location of case studies in the context of the North Sea (map produced by S. Thomsen)

2.6% of the land area. The current municipal boundaries date from the 1960s. As such, there is no recent experience with self-government or smaller municipal structures on the islands. Koster has a significance beyond its size due to its status as a primary tourist destination within the municipality, and west Sweden. The Koster National Park established in 2009 plays an important role in the branding of Koster as an attractive place for tourists to visit. Despite its small size of around 300 permanent residents, the island community has had a high degree of active civil society engagement, with a large number of local organisations. It is nevertheless the case, that the island community is heterogenous, including older families with a long history on the island, a younger generation of newcomers and summer residents (roughly 300 permanent residents, 3000 seasonal residents and 30000 tourists annually). Approximately 75% of the permanent residents are over the age of 75, a significant concern for the future viability of the island population.

Since 2000, a democratically-elected community council (*Kosternämnden*) has been in place on Koster (Morf 2006). The community council is tasked with providing a conduit for dialogue between the municipality and the island community (Kosternämnden online). This arrangement is rare in the Swedish context and has its origins in a legacy of conflictual relations between different interest groups on the island and the desire of the municipality that the island community can speak with one voice on significant issues. The municipality adopted an in-depth comprehensive plan (*Fördjupad Översiktsplan*, hereafter Koster Plan) (Strömstads Kommun 2009) for Koster in 2009, following a three-year consultation and preparation process. In June 2018, Strömstad council officially affirmed the current status of the plan. The plan was produced in parallel to the process of establishing the Koster National Park. This is significant as it means that the policy objectives for the island's sustainable development were aligned with the objectives of the National Park. The Koster Plan is framed in terms of sustainable development. *Kosternämnden* and the County Administrative Board set out an agreed definition of sustainable development in a 2004 document: *"A development that takes into account the islands' great national natural and cultural environmental values and the values for recreation and outdoor life. This means development that respects and supports economic, social and ecological sustainability*

(in Strömstadts Kommun 2009, 11). More specifically, the Koster Plan states that sustainable development on Koster can be supported by practical measures including job creation, housing for year-round residents and protection and sustainable management of the natural and cultural landscapes of the islands (Strömstadts Kommun 2009).

One critical issue currently facing the Koster islands is the closure of the primary school in 2022, as the number of children of school-going age is considered too low to justify the costs of operating the school. The risk of the school on the island facing closure due to declining numbers of children of school-going age was recognised in the 2009 Plan. From the municipality's perspective: "The surest way to maintain basic services such as schools, pre-schools and elderly care is to strengthen the base by having more people living on Koster all year round" (Strömstadts Kommun 2009, 71). Those living in the islands, however, maintain that the reopening of the school is necessary for the islands to be attractive to families who might consider living there and for young people to stay long-term. In 2024, a cooperative pre-school was started by a parents' association. They hope to expand to primary school as the preschool children reach school-going age. This example illustrates the need for island-specific solutions and flexible adaptation in policy implementation to ensure the viability of the islands as a place to live for current and future generations.

Schiermonnikoog and the Dutch Wadden islands (NL): governance capacity and strategic positioning

The Dutch island of Schiermonnikoog is the smallest and most easterly of the five inhabited Dutch Wadden islands. In 1989, the greater part of the island (the main exceptions are the built-up area of the village of Schiermonnikoog and the ferry harbour) was designated a national park. Since 2009, it is located within the transboundary Wadden Sea World Heritage site. The current strategic plan for the national park emphasises an ethos of partnership between the island community and the management of nature. This is reflected in a clear statement that 'the National Park should belong to everyone on the island' and a commitment to strengthen 'the connections between nature and ecology on the one hand and the local economy, cultural history, recreation and tourism and community on Schiermonnikoog' on the other (National Park Schiermonnikoog 2024, 7). The practical relevance of this inclusive framing is evident in the incorporation of specific objectives for sustainable agriculture and self-sufficiency within the national park plan. Whereas previous national park plans focused more narrowly on nature management within a ten-year planning framework, the current plan deliberately broadens the horizon of policy ambitions to incorporate a socio-ecological transformation perspective as well as nature conservation concerns within a vision for 2050. Wider environmental issues facing the island, include the need to reduce nitrogen pollution from cattle farming and the need to carefully manage water consumption, by domestic (including tourists) and commercial users). At the same time, a planned new gas extraction project (Gateway to the Ems- GEMS), located approximately 20 km to the northeast of the island poses new risks in the form of higher nitrate concentrations and potential disturbance to the island dune ecology. These issues require dialogue and agreement among multiple stakeholders and are fundamentally interlinked with the nature conservation objectives of the national park. As partners to the plan, both the municipality of Schiermonnikoog and the province of Fryslan are publicly committed to its objectives, but in the case of some issues, such as gas extraction, decisions are made elsewhere.

The five Dutch island municipalities at the Wadden Sea have entered formal agreements to cooperate on shared interests and share selected administrative functions[3]. This formal cooperation was initiated in 2009, with the signing of a covenant on cooperation between the four Wadden islands in the province of Fryslan (Ameland, Schiermonnikoog, Terschelling and Vlieland). The population of the islands varies between just over 900 on Schiermonnikoog and almost 5,000 on Terschelling. The Wadden test, described above, provided the impetus for this agreement. From the perspective of the national Ministry of the Interior, cooperation between the islands was essential for the islands to receive particular attention, analogous to the Wadden test, at the national level. Subsequently, in 2015, the covenant was expanded to include the larger island of Texel (23,000), located in the province of North Holland. The 2015 Covenant provides a strong framework for coordination and cooperation not only between the five island municipalities but also vertically between the national government, the provinces and the islands, with the aim of achieving better alignment of policy and legislation with respect to the specific situation of the islands. In operational terms, the cooperation between the islands is supported by a partnership of the Wadden islands established in 2005 (*Samenwerkingsverband De Waddeneilanden*). This partnership receives annual funding and is delegated tasks by the island municipalities. Its primary role is to support and promote the shared interests of the islands. The secretariat of the partnership with a current staff of 10 (full-time-equivalent), has the capacity to address strategic issues of shared concern and to engage in strategic policy discussions with other governance actors

[3] In total, there are eight Dutch island municipalities. The other three are islands of the Kingdom of the Netherlands with the status of special municipalities in the Caribbean and are not given further attention in this paper.

and stakeholders at regional (province, Wadden region) national and international levels. This allows the individual island municipalities to focus on their core tasks (e.g. day-to-day running of services on the islands). The island partnership was one of the key partners (alongside national government ministries, the provinces, coastal municipalities and sectoral stakeholders) in the preparation of a policy agenda for the Wadden region in 2050 (*Agenda vor het Waddengebied 2050*, 2020). This strategic policy document is significant for bringing together Wadden Sea conservation objectives with local and regional development objectives of islands and coastal municipalities, recognizing the legitimacy of distinct local, regional, national and international perspectives on the Wadden Sea. An investment programme for the islands, administered by the Wadden islands partnership and funded by national government is closely aligned to the objectives of the 2050 Agenda.

The Hallig islands (DE): negotiating a path between tradition and future transformation

The five inhabited Hallig islands, located at the Wadden Sea coast of Northern Friesland in Schleswig-Holstein have a total population of approximately 230. In contrast to the majority of islands at the Wadden Sea coast, the Halligs are low-lying marsh islands. They are not protected by dikes and are thus subject to regular flooding. Houses and other buildings are built on large artificial dwelling mounds (*warfts*) to provide protection from the flood waters (Meyer et al. 2018). The Hallig islands and traditional Hallig culture are recognised as worthy of protection by the federal state government in Schleswig-Holstein, and receive substantial supports in the form of subsidies. Geographically, the Halligs are enclaves within the Wadden Sea National Park of Schleswig-Holstein. Since 2004, the Halligs have come together to form the development zone of a UNESCO Biosphere Reserve. The Biosphere Reserve covers the same area as the national park. The inclusion of the Hallig islands, and more recently the neighbouring island of Pellworm, within the Biosphere Reserve, reflects the particular relationship of the Halligs with the marine environment and provides a common framework for a range of project-based initiatives. A sustainability strategy for the Halligs published in 2008 following a series of consultation workshops, sets out a future perspective for the Halligs based on the overarching objective to secure and protect the Halligs as both a natural and living environment for future generations (Institut für Raum und Energie 2008). A climate adaptation strategy for the Wadden Sea adopted in 2015 makes more explicit reference to the Halligs as part of the cultural heritage and regional identity of Schleswig-Holstein. Here, the Wadden Sea is considered a natural landscape, with the coastal hinterland and islands forming a cultural landscape. Against the background of this binary framework, the Halligs are perceived as occupying a space in between, characterised by a unique and special relationship between the Hallig communities and their natural environment (Walsh 2018).

Recognition of the need for attention to the particular situation of the Halligs is evident, for example, in provisions that allow for primary school education without children needing to travel to the mainland, as well as in specific provisions and funding for the modernisation of the dwelling mounds and houses to ensure the continued safety of the Hallig islanders as sea levels rise. The Halligs, nevertheless, continue to face particular challenges and additional costs due to their location, small size and reduced accessibility, particularly in winter. The Halligs continue to constitute individual municipalities, each with their own mayor (an unpaid position). Administratively, the functions of the municipalities are bundled and subsumed within the administration of the larger neighbouring island of Pellworm. The shared interests of the Wadden Sea islands of Northern Friesland and the Halligs are represented by a formal association structure known as the Island and Hallig Conference (IHC). On the initiative of the IHC, the German island municipalities came together to prepare an islands resolution, published in 2022. This resolution called for the creation of a regulatory framework that recognises the comparative advantage of the islands and Halligs, simplifies bureaucratic procedures and reduces transaction costs for small and medium-sized investments (*Deutsche Inselresolution* 2022). The details of what such a regulatory framework might entail have not been further specified, although the creation of a position of a commissioner for the islands at the federal government level was considered as a potential option. With the islands resolution, the island communities sought, in particular, to have more favourable conditions for the islands to contribute to climate change mitigation rather than being primarily the focus of climate adaptation measures. This could potentially include the construction and operation of small-scale wind turbines on the Halligs and other islands (Interview). Here, however, a clear conflict is evident between the dominant popular and tourist imaginary of the Halligs (and to a lesser extent other islands) as places of tradition based on a close relationship between people and nature, where there is no place for modern infrastructure such as wind turbines and telephone masts, and the desire of the island communities to contribute to a sustainable transformation of society at large.

Table 2 A summary of Island governance practices, drawn from the case study examples

	Place-based identity	Strategic positioning
Island-mainland relations	Challenges of finding a common voice (Koster islands), negotiating between local and visitor perceptions of islandness (Hallig islands, Koster islands)	Seeking recognition for island particularity, negotiation of Wadden Test (Dutch Wadden Sea islands, German island resolution), negotiation between Koster islands and Stromstad municipality
Island-sea relations	Shifting island-sea relations through designation of surrounding sea area as protected nature, influencing perception of society-environment relations on the islands (all case studies)	Potential for greater engagement with marine policies and strategies (Wadden Sea 2050, Dutch Wadden Sea islands)
Island-Island relations	Recognition of common challenges among neighouring islands, archipelago thinking (all case studies)	Building of strategic partnerships among neighbouring islands (Dutch Wadden Sea islands, Hallig islands)

Discussion

The above case studies provide insights into the governance challenges facing small islands in northern and western Europe and how island communities and municipalities seek to respond to such challenges through the development of governance capacity and strategic relations at higher spatial scales. The case of Koster illustrates how policy commitments to sustainable future development and place-based governance can be undermined by a lack of flexibility and attention to island particularity in sectoral (in this case educational and housing) policies. For the municipality, education and affordable housing are separate issues, but from a community and place-based perspective, both issues must be seen as mutually interdependent. Although the island community also faces other challenges, satisfactory resolution of this issue would appear to be key to the restoration of trust between the island community and the municipality. In the case of Schiermonnikoog, the national park provides a focal point for discussion and negotiation of a shared future vision for the island and deliberate efforts are made to integrate nature conservation with broader sustainability issues on the island within a common place-based framework. Nevertheless, the national park continues to face some degree of opposition and unresolved tensions and contradictions, perhaps inevitably, remain. The active cooperation among the Dutch Wadden island municipalities, illustrates the potential for island communities to work together on common issues of strategic importance, providing a platform for articulation and negotiation at higher levels of governance. The island proofing mechanisms, introduced in both the Netherlands and Scotland indicate pathways for embedding island particularity in legislative procedures. Further research is required, however, to assess their effectiveness in practice.

In the case of the Hallig islands, the distinctiveness of the Halligs as a unique living place of cultural significance is recognised and financial support is provided to ensure people can continue to live there into the future. Yet, tensions are evident between the popular and policy imaginaries of what the Halligs are and should be and the situated realities of life on very small islands where place-based, island-specific solutions needs to be found to a myriad of social, environmental and infrastructural challenges. The work of the island and Hallig Conference and the preparation of the German islands resolution, both indicate a recognition of common challenges experienced across a very diverse spectrum of islands within the German governance system and a need for structural reforms to address these challenges at a strategic level. In Table 2 below, we summarise key insights from the case studies with respect to the framework presented in Sect. 4 and Table 1. Through each of the case studies above, it has been possible to identify recent and ongoing processes of place-based governance whereby island identities are subject to (re)negotiation and the islands in question are placed within wider strategic policy contexts in different ways. The typology of underlying spatial dimensions inspired by Stratford et al. (2011) provides a useful heuristic device to better understand the multi-dimensional character of these practices.

Conclusions

There is an evident need for specific attention to small islands and their governance in the context of contemporary societal and environmental challenges. Small islands, in the northwest European context, as elsewhere, face a myriad of specific socio-environmental challenges that cannot be reduced to climate change adaptation and the impacts of sea-level rise. The concept of island particularity provides a framing for addressing the specificity of islands and thinking through the implications of this 'particularity' for policy and practice. In this paper, we have deliberately highlighted both the physical-material and discursive-immaterial aspects of island particularity. In policy terms, islands must be recognised as lively places rather than simply as locations or areas on a map. This paper has set out the case for a nuanced geographical perspective, recognising multiscalar processes and relational connections. Place-based island identities play an important role in shaping the scope for governance strategies but may also become reconfigured

through processes of strategic visioning that recognise the potential for place-based practices. At the same time, it must be recognised that island identities and place meanings are not fixed or static but plural, diverse and subject to ongoing renegotiation (see also Walsh and Döring 2018). The island futures of envisaged by a younger generation of island residents may differ significantly from the perceptions of tourist visitors or, indeed, the island imaginaries of policymakers located at a distance from the islands themselves.

Legislative and policy frameworks at higher levels of governance can provide enabling frameworks that serve to ensure that resources are allocated in a flexible and accessible manner to address the particular needs of island communities. Further, dedicated research efforts are required to empirically assess the effectiveness of the legislative measures in operation in Finland, Scotland and the Netherlands and the potential for transfer of good practice to other national contexts. The case studies explored in this paper show how island governance actors engage in strategic positioning, developing relational networks based on commonalities among islands and identifying points of leverage at higher levels of governance. It is evident that our understanding of place-based governance capacities must encompass both the internal dimensions of place-making and place-quality specific to individual islands, and the external dimension of strategic positioning, concerned with the articulation and perception of island futures and identities within wider governance contexts. The case studies demonstrate the need for theoretically-informed empirical studies that go beyond a narrow conceptualisation of policy implementation to engage with the nuances and contextuality of multi-scalar and relational island governance practices.

This paper is intended to serve as a point of departure for further research, both conceptual and empirical, concerning the relationships between island particularity and island governance. We call on island studies researchers to pay more attention to questions of governance and governance scholars to take questions of local specificity and the situated nature of governance practice more seriously. In our view, island governance research should take explicit account of both the material and discursive dimensions of island particularity and take a multi-scalar approach, recognising the embeddedness of islands within both multilevel and multisectoral governance systems.

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