



**PUBLIC CONSULTATION FOR ISLANDS CONNECTIVITY PLAN - STRATEGIC APPROACH PAPER AND VESSELS AND PORTS PLAN**

Report by Chief Executive

**PURPOSE**

- 1.1 This report seeks Comhairle approval for a draft response to the Public Consultation on Transport Scotland's 'Islands Connectivity Plan Strategic Approach Paper and Vessels and Ports Plan'.

**EXECUTIVE SUMMARY**

- 2.1 Transport Scotland is currently consulting on a new draft Islands Connectivity Plan (ICP), comprising a Strategic Approach Paper and a Vessels and Ports Plan which outline ferry service objectives to 2045. A draft Comhairle response to this consultation has been prepared and is appended for approval.
- 2.2 The Comhairle's draft response draws out the following points:
- the draft ICP seems to be aimed more at managing the *status quo* of ferry services than at supporting the growth of services that the islands require;
  - the ICP does not effectively island-proof transport policy;
  - priorities revolving around reliability, resilience and capacity bear little resemblance to lived island experience with the ferry service;
  - integration with other modes of transport should be better;
  - the pace of fleet decarbonisation should be accelerated rather than penalising island travellers by seeking to restrict the number of vehicles carried;
  - no account is taken of the effects of the expansion in renewable energy development coming to the islands over the second half of this decade, which will require provision of a dedicated freight ferry on the Ullapool – Stornoway route;
  - Road Equivalent Tariff should be retained with additional revenue realised, and deck space released, through higher fares for larger motorhomes; and,
  - ferry services are a public good with lifeline services to be supported by Government whatever the cost. To argue for downsizing of ferry services on account of the investment required is disingenuous when railways and roads are also subsidised.

**RECOMMENDATIONS**

- 3.1 It is recommended that the Comhairle approve the draft response to the Public Consultation for the Islands Connectivity Plan -Strategic Approach Paper and Vessels and Ports Plan, shown at Appendix 1 to this report.

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Appendix Draft Comhairle Response to Islands Connectivity Plan Public Consultation

Background Papers [Strategic Approach Paper](#), [Vessels and Ports Plan](#), [National Islands Plan Survey: Final Report](#), [National Transport Strategy 2: M&E Framework](#)

## 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	Transport connectivity does not meet the needs of our communities
Equalities	Planning and infrastructure meet the needs of our communities
Corporate Strategy	Support resilient communities and quality of life
Environmental Impact	None
Consultation	Public Consultation for Islands Connectivity Plan - Strategic Approach Paper and Vessels and Ports Plan open from 1 February to 3 May 2024

## BACKGROUND

- 5.1 The Islands Connectivity Plan (ICP) replaces the Ferries Plan but is wider in scope, taking account of ferry services, aviation and fixed links as well as onward and connecting travel. The ICP is being developed within the context of the National Transport Strategy and National Islands Plan and is informed by the outcomes of the Strategic Transport Projects Review (STPR2).
- 5.2 The ICP Strategic Approach Paper which Transport Scotland is currently consulting on proposes an overall strategic approach to island transport connectivity, including ferries, aviation (noting that most of the network is run by private operators) and fixed links. The Strategic Approach Paper seeks to address the strategic challenges facing the Clyde & Hebrides Ferry Services and Northern Isles Ferry Services.
- 5.3 The ICP Vessels and Ports Plan outlines the Scottish Government's objectives for the Clyde & Hebrides Ferry Services and Northern Isles Ferry Services which Scottish Ministers are directly responsible for. This Vessels and Ports Plan updates a draft Plan published at the end of 2022 and reflects feedback provided by stakeholders. The Vessels and Ports Plan outlines the investment required in these areas to deliver reliability and resilience.
- 5.4 This report suggests a draft Comhairle response to both the Draft Strategic Approach Paper and the Draft Vessels and Ports Plan with Comhairle comments summarised as follows.

## DRAFT STRATEGIC APPROACH PAPER

- 6.1 **Themes, Vision and Priorities.** A number of **Themes** are proposed but the response recommends a focus on Reliability, Resilience, Capacity and Demand Management. The asset life of the current fleet is considered excessive leading to repeated breakdown and service disruption. The response makes the key point that this Draft Strategic Approach Paper seems to be focusing on managing the *status quo* of island ferry services through reducing capacity rather than supporting growth. While the **Vision** presented is admirable, it bears little resemblance to the lived experience of islanders who have to face disruption of lifeline services on a daily basis. The relentless policy drive to reduce vehicle numbers on ferries in an area of highly dispersed population almost wholly dependent on private transport will do little to address depopulation, particularly in the absence of detailed work on

integration of other transport options. The **Priorities** presented, while admirable, are far removed from island experience with no clear roadmap to achievement of these priorities.

- 6.2 **Community Voice and Transparency.** The response references the robust response offered by the Comhairle to 'Petition PE1862: Introduce community representation on boards of public organisations delivering lifeline services to island communities. The point is made that there is a lack of 'Island Proofing' (through an Island Communities Impact Assessment under the Islands [Scotland] Act 2018) of Transport Scotland policy with island communities being asked to accept compromises and inconveniences not being required of any other transport user in mainland Scotland.
- 6.3 **Accessibility.** The response recommends that accessibility should be assessed port by port and vessel by vessel rather than network-wide. An ageing demographic and growing issues with patient travel, mental health and debilitating health conditions mean that service operators should do more to make ferries and port facilities accessible and safe places in which to travel. To do so would also increase flexibility in vessel provision, increasingly necessary where there is frequent service disruption.
- 6.4 **Reliability and Resilience.** The point is made that the ferries are our roads / railways and the 'lifeline' nature of these services requires that improvements to reliability and resilience is the first priority of the ICP. The catastrophic financial loss suffered by businesses in Harris and Uist particularly through the withdrawal of services and vessels is referenced.
- 6.5 **Timetable, Essential and Urgent Travel.** Using the 'Samsø System' from Samsø Island in the Baltic Sea as an example, the response makes the case for an islander priority system, reserving a portion of the vehicle deck for those carrying Islander Priority ID Cards. This guarantees deck space for island travellers, whenever they decide to travel.
- 6.6 **Integration of Services.** Providing a comprehensive public transport system in an area of highly dispersed population is extremely challenging and this results in a high level of reliance on the private vehicle in island communities. The ICP seeks to reduce vehicle numbers on board and move people towards public transport while failing to recognise these challenges. To limit ferry capacity, the ICP heavily promotes changes in travel mode mid-journey, regardless of a constrained public transport system, accessibility challenges in ports and the fact that many travellers will be transporting bulky luggage and goods. Nowhere else in Scotland are motorists required to switch from one mode of transport to another and back again to get to their destination and this is a clear 'Island Proofing' issue. It is also noted that CalMac's new ticketing system is not integrated with other transport modes.
- 6.7 **Capacity and Demand.** In the face of an ageing fleet and a growing visitor economy, the ICP seeks a stand still of ferry services by limiting capacity on board. Timetables operate to time rather than to capacity with more distant islands penalised – an example of this was the recent withdrawal of the mezzanine deck on the Little Minch because delays caused by filling the mezzanine were interfering with crewing models. In one year, this measure cost the Harris economy £8.5m (Harris Development Ltd). Despite the Comhairle, HITRANS and HIE: Innse Gall commissioning a socioeconomic report on inter-island connectivity with the final report transmitted to Transport Scotland, inter-island capacity remains constrained. Similarly, inter-island connectivity is constrained despite the commissioning of Socio-Economic Reports to enhance timetables indicating capacity constraints. Again, the inequity of requiring travellers to change mode of transport mid-journey due to the inadequacies of a failing ferry fleet is noted. No other motorist in Scotland is required to empty their vehicle of bulky goods, change transport mode, then re-load their bulky goods to another vehicle before reaching their destination. This is a key 'Island Proofing' issue not yet addressed by Transport Scotland.
- 6.8 **Freight.** It is possible that a separate review of Road Equivalent Tariff (RET) could see its removal in favour of an 'Islander Fare' and more expensive fares for non-islanders. It is not clear that this 'Islander Fare' will be any more affordable than the current fare while it is considered that a blanket fare increase for all non-island residents could unfairly impact on islanders working away from home,

visiting friends and family and low-impact tourists who provide the market for the local accommodation industry. The response refers to the impact on ferry capacity and island infrastructure caused by high-impact tourists travelling with larger motorhomes. The response suggests that retention of RET should be considered alongside a fare increase for larger motorhomes. The islands are entering into an intensive period of Renewable Energy development with a Converter Station, three Onshore Wind Farms and two Offshore Wind Farms to be built over the period 2026 to 2030. The combined contract value of these developments is £6.2 billion and millions of tonnes of freight and thousands of workers will have to be transported to and from the islands. In Shetland, Renewable Energy developments recently required 300 articulated lorry crossings per month on average and 500 articulated lorry crossings at peak. This equated to 10 articulated lorry crossing per day average and 17 per day peak. The MV Loch Seaforth only has capacity for 20 articulated lorries and the Western Isles demand comes at a time when food and goods imports to service a workforce of thousands will also be required. The scale of the Western Isles development will be four times that of Shetland and yet this forward plan for ferries makes no mention of increased freight and passenger capacity over the development period. It is clear that the Ullapool – Stornoway route is going to require, at the very least, a dedicated Freight Ferry, running alongside the MV Loch Seaforth, from 2026.

## **DRAFT VESSELS AND PORTS PLAN**

- 7.1 **Prioritisation.** It is concerning that Transport Scotland state in their draft ICP that, *“The costs of providing ferry services are high and rising – this is creating an affordability challenge for both the Scottish Government and local authorities. We are in a period of sustained financial challenge, and it will be unsustainable to continue to increase funding of ferry services at the same rate as has been done in recent years”,* and, *“The annual deficit between CHFS and NIFS operational costs and income from ferry fares has increased by almost 100% over the last 10 years. Meaning that for every £1 paid by users towards covering the annual operating cost, another £2 of public funds are required”.* This sort of messaging is unacceptable when dealing with a lifeline service for which public support is required. Lifeline services are as described and require the necessary support, whatever the cost, provided that the services are run efficiently. The revenue versus public funds ratio for Scotland’s Rail Service is exactly the same at £1: £2 yet a diminution and contraction of rail services is not suggested. The level of investment in Scotland’s road infrastructure with minimal return through taxation is even higher yet there is no proposal to restrict capacity on Scotland’s roads. The ferries are the islands’ roads and railways, and a cut in service and capacity to suit contracting Government budgets is wrong in principle and incompatible with the principles of Island Proofing. Resilience, Reliability, Affordability, Capacity (cars and commercial) and Addressing Depopulation in a context of market failure should be prioritised.
- 7.2 **Low Carbon and Environmental Impact.** While the planned Small Vessel Replacement Programme seeks to provide low carbon ferries, none of the Phase 1 vessels will be deployed in the Western Isles and there is no certainty over funding for Phase 2. And while the four new Islay Class vessels will be hybrid-powered, only two of these will be deployed in the Western Isles (one in winter). The pace of decarbonisation across the Major Vessel fleet, on which the islands so heavily depend, is unacceptably slow and, with island travellers now facing the prospect of travel option curtailment on carbon grounds, this represents another hidden discrimination against the islands. Transport Scotland must accelerate decarbonisation of their Major Vessel fleet and should not seek to constrain deck space on large, heavily polluting vessels when the answer is to invest more in low carbon replacements.
- 7.3 **Ferry Fares.** The response states that the term ‘Road Equivalent Tariff’ (RET) is misleading because the fares charged are twice the actual cost of covering the same distance by road taking account of vehicle depreciation, road tax, insurance, maintenance and fuel. CalMac’s RET includes a hidden ‘Infrastructure Element’ which is not transparent and set by CalMac with little reasoned justification. Having said that, RET is a valuable, although still too expensive, benefit for the island economy. It should be retained as is, with additional revenue being realised, and deck space released by a higher fare for high-impact tourists travelling with larger motorhomes. Transport Scotland propose an

'Islander Fare' should RET be withdrawn but it is not clear that this fare will be any more affordable than current RET fares. The Island Residents Card introduced on the Barra – Glasgow PSO has not proved popular for mainland residents with island connections.

## CONCLUSIONS

- 8.1 The draft ICP seems to be aimed more at sustaining an unsatisfactory *status quo* than at supporting the growth of services that the islands require and there is no clear roadmap for how ICP objectives will be achieved. Even with the introduction of two new vessels to the Little Minch, South Uist and Barra will continue to be served by a 29-year-old and 35 year old vessel with no funds identified for their replacement under Phase 1 of the Major Vessel Replacement Programme.
- 8.2 The ICP does not show any serious attempt at island-proofing of transport policy. Measures are proposed which will disadvantage island travellers when compared to fellow transport users on the mainland. Any implied disadvantage is contrary in spirit and intention to the ethos of the Islands (Scotland) Act 2018 and the requirement for Island Proofing of all policies, services and strategies.
- 8.3 Priorities revolving around reliability, resilience and capacity bear little resemblance to lived island experience with the ferry service. The lack of a roadmap to improvement is concerning and the ICP seems to settle on a strategy of maintaining the *status quo* driven by variable levels of investment.
- 8.4 Integration with other modes of transport could be much better. The ICP is heavily geared towards ferry services, largely because, with the exception of the two Public Service Obligations, island aviation services are run by private operators and regulated by the market rather than by Government. However, there is little evidence of inter-modal integration in the ICP, either with aviation services or with onward public transport services. Without such integration, changes to patterns of travel cannot reasonably be expected.
- 8.5 The pace of decarbonisation across the ferry services is unacceptably slow and the ICP makes little commitment to its improvement. Instead, the ICP focuses on consumer-side carbon reductions, disadvantaging island travellers by seeking to restrict the number of private cars carried. In an area of high population dispersal, heavily reliant on the private car, this approach is not practical and disproportionately detrimental. More should be done on supply-side carbon reductions by accelerating the pace of fleet decarbonisation.
- 8.6 No account is taken in the ICP, which sets out ferry services to 2045, of the huge expansion in renewable energy development coming to the islands from 2026. Experience in Shetland suggests that the articulated lorry crossings required there could almost fill the MV Loch Seaforth daily and the scale of Western Isles development is some four times that of Shetland. Planning must be initiated for provision of a dedicated Freight Ferry on the Ullapool – Stornoway route from 2026.
- 8.7 Road Equivalent Tariff (RET) is not a transparent measure as it hides a notional 'Infrastructure Element' calculated by CalMac. While flawed in definition and still regarded to be over-priced for the customer, RET should be retained with additional revenue realised, and deck space released, through higher fares for larger motorhomes. There is no evidence that introduction of the proposed 'Islander Fare', while increasing fares for non-islanders, will result in a fare any cheaper than the existing RET fare for those who use the ferries most often.
- 8.8 Ferry services are intrinsic to a fairer Scotland and represent a public good with efficiently-run lifeline services to be supported by Government whatever the cost. Arguments which suggest downsizing of ferry services on account of the investment required when mainland railways and roads are similarly subsidised with no question of restricting capacity are inconsistent with the provision of lifeline services and island-proofing. The ferries are islands' roads / railways and should be supported to the same extent.