

# Public Consultation for Islands Connectivity Plan - Strategic Approach Paper and Vessels and Ports Plan

## Consultation Identifier Questions

**Q1. Are you completing this on behalf of yourself or an organisation?**

- ☐ Individual  
☒ Organisation

**Q2. If an organisation, please list below.**

Comhairle nan Eilean Siar

**Q3. What statement best describes your living situation?**

- ☐ I live on the mainland the majority of the time  
☐ I live on a Scottish island or peninsula the majority of the time

**Q4. If you live on a Scottish island or peninsula, please comment below which one.**

Western Isles

**Q5. What age category are you in?**

- ☐ Under 16s  
☐ 16 to 18  
☐ 19 to 21

### Transport Scotland

- ☐ 22 to 34
- ☐ 35 to 44
- ☐ 45 to 54
- ☐ 55 to 59
- ☐ 60 and over

### Q6. Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?

- ☐ Yes, limited a lot
- ☐ Yes, limited a little
- ☐ No

### Q7. What do you mainly use the ferry services for?

- ☐ For Business
- ☐ For Employment/Education
- ☐ For Personal/Leisure
- ☐ All of the above

### Q8. How frequently do you use the ferry services?

- ☐ Never
- ☐ Occasionally
- ☐ Weekly
- ☐ Monthly
- ☐ Seasonally (Summer period)

## Main Consultation Questions

### Themes, Vision and Priorities

Transport Scotland has gathered feedback from previous workshops and consultations to identify priorities for the future of Island transport connectivity: ferry networks, supported by the integration with other transport services. This information has contributed to the development of themes, which are the focus for the Islands Connectivity Plan.

The following key themes emerged:

## Transport Scotland

- Community voice and transparency
- Reliability and resilience
- Accessibility
- Timetables, unplanned and essential travel
- Integration of services
- Capacity and demand
- Freight
- Vessels and ports
- Low carbon and environmental impact
- Ferry fares
- Local authority services

The Comhairle's key concern is around RELIABILITY AND RESILIENCE and CAPACITY AND DEMAND. An ageing ferry fleet is subject to repeated breakdown. It is very common for a vessel to break down or for a breakdown elsewhere in the network to be backfilled by removing a lifeline vessel from a Western Isles route particularly Lochboisdale. The current state of affairs in terms of asset lifespan and lack of stand-in vessels is untenable and unacceptable. For the Western Isles, the six new ferries due by 2026 of which 2 will benefit the Little Minch route leaving a 35 year old vessel serving Lochboisdale / Mallaig, and a 29 year old vessel serving Castlebay / Oban.

The draft ICP seems to be focused on managing the decline of island ferry services by seeking to reduce capacity rather than supporting growth through increased capacity. Visitor numbers to the islands are growing year on year, and Renewable Energy developments over the next ten years will bring demand for thousands of additional vehicle and passenger movements. Any consideration of demand has to go beyond actual demand to look at unmet demand (potential travellers turned away) and invisible demand (the growing number of potential travellers who don't even bother trying to book because they are aware of the state of the ferry network generally). Meeting this demand would unlock considerable economic benefit in the islands and would contribute to population retention and growth, evidenced by economist, Steve Westbrooke, who forecasted back in 2019 that, by 2022, under a high growth scenario, that unmet demand would total £7.9m (Stornoway-Ullapool).



Second Ferry  
Report Final.docx



Outer Hebrides  
Ferry Services (Capa

## Transport Scotland

### Q9. Do you think these key themes capture the main aspects of transport connectivity for island and peninsula communities?

☒ Yes

☐ No

Please explain your answer.

Based on feedback and discussions with key stakeholders and drawing on Scotland's National Transport Strategy 2 and the National Islands Plan, we have developed a draft vision and associated priorities for ferry services, supported by other transport services.

## Draft Vision

Scotland's ferry services, supported by other transport services, will be safe, reliable, affordable and inclusive for residents, businesses and visitors enabling transport connectivity, sustainability and growth of island and peninsula communities and populations.

## Draft Priorities

### Priority 1: Reliable and Resilient

Reliable and resilient ferry services that meet the needs of communities and businesses and support the transition to a well-being economy which is fair, green and growing.

### Priority 2: Accessible

Ferry services that are accessible and provide easy to use and affordable transport connectivity for all users.

### Priority 3: Integrated

Ferry services that enable sustainable and active travel choices which support our health and well-being and make our Island and other ferry dependent communities great places to live, work and visit.

**Transport Scotland**

**Priority 4: Low Carbon**

Ferry services that take actions to reduce the negative environmental impact of their operations and help to achieve Scotland's net-zero targets.

**Q10. Do you believe the draft vision captures the aspirations of island and peninsula communities for their future ferry services?**

☐ Yes

☒ No

Please explain your answer.

The draft vision is admirable but there is a disconnect between this vision and the current experience of ferry users. Transport Scotland's drive to reduce vehicle numbers on ferries, due to lack of deck space in ageing vessels, will not enable connectivity and growth in a region where there is high reliance on the private car (due to the inevitable limitations of public transport in an area of highly dispersed population). While reducing vehicle numbers is often justified by environmental arguments, the fact is that no transport user on other networks is being forced out of their vehicle at great personal inconvenience. This is an Islands Proofing issue. The ferries are our roads / railways and, rather than seeking to reduce capacity, Scottish Ministers and Transport Scotland should be providing sufficient ferry capacity to ensure that no traveller is disadvantaged compared to their mainland counterpart. Travelling in, to and from the islands is already difficult enough due to the challenges of providing an effective public transport service to a highly dispersed population, and Transport Scotland should not be seeking to compound these difficulties by providing below-capacity ferries.

'Sustaining Population' should be introduced as a Draft Priority to align with the draft vision. The draft vision should also include resilience. Latest census data between 2018 and 2028, indicates that the population of Na h-Eileanan an Iar is projected to decrease from 26,830 to 25,181 (or 6.1%), compared to a projected increase of 1.8% for Scotland and transport providers have a key role to play in addressing and reversing this trend. Further constraining ferry capacity and introducing new challenges to personal movement will only exacerbate these negative trends, particularly in the absence of detailed work on integration of other transport options.

## Transport Scotland

### **Q11. Do you think the 4 draft priorities reflect what island and peninsula communities see for their future ferry services?**

☐ Yes

☒ No

Please explain your answer.

The Draft Priorities probably reflect what island communities would like to see but they are far, far removed from the experience of island communities with the current ferry service. Ferry connections are far from reliable and resilient, public transport connections are often sporadic and do not align with ferry times. Transport Scotland's current policy direction seeks to remove choice from travellers with regard to onward travel modes, and old and obsolete ferries are major carbon emitters.

## **Community Voice and Transparency**

We acknowledge the importance of empowering community voice and transparency in communications. The current methods of engagement that are used by operators to inform communities are through email and webpage updates, with further communications shared through relevant Ferry Committees and Transport Forums.

Local authorities and Scottish Government/Transport Scotland use engagement methods such as through project reference groups, stakeholder groups and webpage updates.

However, we have heard from communities that more can be done to take account of their views when it comes to decisions on ferry services and that there is a lack of clarity on how decisions are made.

### **Q12. Are there other ways of engaging with communities and stakeholders that would benefit decision making on ferry services, including vessels and ports projects?**

☒ Yes

## Transport Scotland

☐ No

The Comhairle has submitted a response to the Petition ‘PE1862: Introduce community representation on boards of public organisations delivering lifeline services to island communities,’ which can be viewed [here](#). This calls for enhanced islander representation on ferry/aviation boards. Furthermore, engagement should be timeous, providing explanations regarding decisions that are taken and including democratically elected representatives as consultees.

All Transport Scotland, DML / CalMac, and CMAL reviews, policies, and strategies must be subject to an Islands Community Impact Assessment (ICIA) on a community basis, rather than on a network wide CHFS basis. The Strategic Paper indicates that the ICIA, Equalities, and Business and Regulatory Impact Assessments are to be carried out on an ICP wide basis but ICIA legislation states that impact to each community needs to be assessed, and it naturally follows that the same approach be taken for both the Equality and Business and Regulatory Impact Assessments.

Please explain your answer.

## Accessibility

We propose introducing an Accessibility Standard that would be in addition to the legal requirements and could act as guidance for all ferry services. This is to ensure that our ferry services, vessels and ports are easy to use for all, while recognising that people have different needs and capabilities.

The Standard could include standards such as inclusive and disability training to be carried out frequently and an accessibility review carried out periodically on ferry services, ports and vessels.

### Q13. Do you think an Accessibility Standard is a good idea?

☒ Yes

☐ No

Please explain your answer.

The Strategic Paper states that: 'An Equalities Impact Assessment will be carried out on the overall Islands Connectivity Plan. This process aims to ensure that the impacts on people with the protected characteristics are captured and considered in the development of policies and plans detailed in the draft Islands Connectivity Plan.'

As stated above, the EQIA should be carried out on a community basis, rather than on a network basis, in order that community needs are assessed, and to facilitate appropriate mitigations to redress these specific needs.

## **Q14. What do you think should be included in this standard?**

Please explain your answer.

If travel with an attendant is required for safety reasons, personal care assistance or the patron is unable to understand safety instructions, there should be no additional fee for the attendant. The Passenger Access System at Stornoway Port has been at times out of use for long periods causing great inconvenience to foot passengers in having to board and disembark via a congested car deck. An alternative back up method of boarding should be investigated particularly to meet the needs of those that are less able. The guidance needs to take account of an ageing demographic, an increase in mental health issues, and health conditions such as autism and allow for provision of facilities on board such as quiet spaces. Making ferries and port facilities more accessible would also increase flexibility in vessel provision, increasingly necessary where there is frequent service disruption.

## **Reliability and Resilience**

Community feedback highlighted that the reliability and resilience of ferry services needs to be seen as a priority due to the impact on communities, businesses and visitors when ferry services are disrupted.

## **Q15. Do you agree or disagree that the first priority of the Islands Connectivity Plan should be to improve reliability and increase resilience of ferry services?**

- ☒ Agree  
☐ Disagree



Please explain your answer.

The Comhairle in May 2021, after a continued period of frustration with the level of ferry services to the Western Isles, set out a blueprint of measures on the basis of a manifesto for change [here](#). Ferries are our roads / railways and the lifeline nature of these services requires that improvement in reliability and resilience is ranked as the first priority of the ICP. An agreed definition of a 'lifeline service' is also urgently needed, preferably through legislation, and this is reflected in the Comhairle's response to the CHFS3 consultation.

The unreliability of the current fleet goes beyond inconvenience to travellers. In June 2023, the MV Lord of the Isles was removed from her timetabled route resulting in a quantified £3 million loss of business trade in Uist. Over the summer of 2022, loss of the mezzanine deck on the Little Minch route resulted in 10,000 fewer vehicles being carried and translated to a loss to the local economy of £8.5 million. The Harris community also had no service during the Uig linkspan closure.

With the two new ferries for the Little Minch not scheduled to enter service until 2026, this catastrophic economic loss is set to continue and escalate to £33 million if not addressed. Replacement of the linkspan at Lochmaddy is also required.

These staggering socioeconomic impacts are simply ignored by ferry operators and Transport Scotland.

## Transport Scotland

### Timetable, Essential and Urgent Travel

We are aware that as ferry travel has become more popular, some services have become more difficult to accommodate short-notice spaces for essential vehicle travel by island residents and key workers.

The booking platform should retain capacity for emergency travel for island residents and key workers. It is important to facilitate Patient travel in terms of integration of different modes of transport as integration is not optimal, for example from Barra to Stornoway, and from Stornoway to Inverness.

A full definition of key workers is required.

The new Islander Priority Pilot that reserves a percentage of car deck space which is released for booking 72 hours before sailing time may need further refinement as the system is open to booking by anybody. Therefore, a traveller who previously might have used Advance Standby can instead buy a ticket 72 hours before sailing time. In Samso in the Baltic Sea, the 'Samso System' (an islander-priority system) allocates an ID Card to all island residents and eligible frequent-travellers, where access to a portion of the car deck space is reserved. Whenever they decide to travel, Samso residents and those eligible are guaranteed capacity for their car on the lifeline ferry service.

### Q16. Do you have any suggestions as to how the booking process could release vehicle space on services when island travel with a vehicle is essential?

Please explain your answer.

As stated above, please refer to the 'Samso model', and further refinement of the Islander Priority Pilot. A definition of key worker should also be provided so as not to exclude certain professions.

## Integration of Services

Journeys on our ferry networks are often only part of a longer journey between the traveller's ultimate origin and destination. The end-to-end journey can combine the use of several transport modes which can include public transport and/or active travel (walking, wheeling, and cycling) or a private vehicle. An integrated transport network that allows easier transition between the ferry and public transport or active travel is a key enabler to encourage the use of our ferry networks without the need for a private vehicle. This has benefits to the user such as making the transport system more accessible, making better use of capacity on ferries and contributing to net zero.

Due to a widely distributed, sparse population, it can be very challenging to provide a comprehensive public transport service in the islands. For instance, no public transport service is available to take travellers to a ferry check-in which closes at 6.15am. This forces island residents to take a private vehicle to their departure ferry port. Improving the quality and availability of bus, coach and train connections at either end of the ferry service and aligning ferry arrival / departure times to facilitate a journey dependent on public transport, would encourage sustainable travel but is not always practicable. Interventions to consider could include increasing support for rural bus services, increasing the availability of demand responsive transport services in islands, and introducing Car Clubs at ferry terminals.

The new CalMac ticketing system is not integrated with other service providers, and CalMac is not currently integrated with other transport modes. The use of public money to support a ticketing system that does not facilitate intermodal ticketing demonstrates that the operator's needs appear to have been prioritised over customer needs. Offering a reduced fares option to users of integrated public transport services should be considered as an option. Air connectivity through the lifeline air services is of vital importance in Na h-Eileanan an Iar, and ferry services timetabling should better align with the air services timetables.

Inclement weather in the Western Isles and a lack of active travel infrastructure, coupled with distance from ports, does not make active travel an option. Investment in Active Travel Facilities can improve the ability of those living nearer the main ferry terminals to travel sustainably, but even for relatively short distances the need to carry luggage may deter this as an option.

There have been significant increases in cycle tourism recently, which is to be encouraged.

**Transport Scotland**

**Q17. What would encourage you to use public transport or active travel as part of your overall journey when using the ferry services?**

**Capacity and Demand**

We have heard that the space for vehicles on busy ferry routes fills up quickly at popular times, especially in summer. This makes it difficult for residents of those islands, and visiting key workers, to travel with a vehicle at short notice.

We propose to address ferry capacity issues by:

- Using refreshed community needs assessments to identify different options for service frequencies and vessel size
- Collaborate with operators and communities to identify ways of using existing and planned capacity better
- Identify the key “pinch points” on the Clyde and Hebrides Ferry Service and Northern Isles Ferry Service networks and consider options for additional vehicle capacity where this is practical, beneficial, and affordable.

**Q18. Do you agree or disagree with this approach to dealing with ferry capacity due to increased demand?**

☐ Agree

☒ Disagree

Please explain your answer.

## Transport Scotland

The Routes and Services Methodology applied to the Community Needs Assessments has been updated from a 'crossing times' model to a 'crewing model'. These are two ways of saying the same thing; that communities at most distance from the mainland will receive a poorer service with lower crossing frequency. The Comhairle contends that a new market of Day Trippers to the Western Isles could have been opened up had local advice been heeded with two, separately crewed, smaller vessels serving communities at most distance. The two vessels could run in staggered rotation, staffed by two crew shifts, each working a regular day's hours. Off duty crew could live in shoreside accommodation, removing the cost and space required to provide living accommodation on board ship. It is not clear whether the updated methodology will fulfil these aspirations. Currently the timetable operates to time rather than to capacity, which detrimentally impacts the island economy. It is important that the methodology is fully robust, fully island proofed, and includes a measure for constrained demand for each of the Western Isles routes, so as to fully reflect current and future community needs.

Regarding ways of using existing and planned capacity better a Car Hire or Car Club option should be available either side of ferry crossings, but the cost should be road-equivalent to incentivise travellers to use the service, otherwise they will simply use their own car. Many ferry trips involve the movement of bulky items, for example a shopping trip to the mainland for household fixtures and fittings, and it would be unreasonable to expect travellers to empty these bulky items from a Hire/Club Car near the mainland port, transport them unaided to the ferry berth, haul them up a passenger access system, then haul them back down the passenger access system and into their own cars at the home port. The decision whether or not to travel with a car should be entirely discretionary for the traveller and should not be forced by the ferry operator – elsewhere in Scotland's travel network, travellers are able to get from point A to point B in a single mode of transport (car, train, bus, 'plane etc) without disruption. Islanders should not be disadvantaged by having to disrupt their journey with different modes of transport (car, foot passenger on ferry, rental vehicle, bus, train etc) against their will. Again, the ferries are our roads / trains and travellers should be treated no differently to road or train users on the mainland. For anyone travelling by foot it would be necessary for bus and train connections to work better than they do at the moment. We also have the problem of constantly changing ferry timetables, which is making integrated travel almost impossible.

Any move by Transport Scotland to disincentivise cars on ferries must be subject to a rigorous Islands Community Impact Assessment for each island community. The [National Transport Strategy](#): *'will ensure those living in rural, remote or island communities will be well connected and have as equitable access to services as those living in the rest of the country, therefore making a positive contribution to maintaining and growing the populations in these areas.'* As the Islands Connectivity Plan supports the NTS2, and the National Islands Plan, this theme amongst the others requires to be met. Overall ICP progress will be measured through Transport Scotland's Monitoring and Evaluation of the NTS2 Indicators.

## Transport Scotland

The headline indicators do not include performance measurements such as reliability and resilience, though performance is alluded to in the secondary measures. Also impact on business is not clearly included in the headline indicators where only spend on transport for households and individuals is indicated.

The National Islands Plan Survey conducted in 2020 included transport as a theme. Residents expressed least satisfaction with fares for both residents and visitors.

Different patterns of transport use are notable between different age groups, with older people making greater use of local buses and mainland ferries, younger people flying to and from the mainland more often, and middle-aged residents (aged 36 to 50) making more use of inter-island ferries. Older people were more likely to express dissatisfaction with roads, paths and pavements.

Just over a third of island residents say that it is easy to connect between different forms of transport when making journeys to or from their home. Arran, Bute and the Cumbraes had higher levels of agreement with this statement (60%), and Uist and Barra significantly lower levels (9%). Overall, ferries to and from the mainland are the most frequently used form of transport for islanders. Two thirds of island residents agree that the mainland ferry service runs when they need it, 58% that it is reliable and 64% that there is usually space when they need it. Less than half agree that fares are good value for locals and visitors. Less than one in five residents feel the flight fares to and from the mainland are good value

### NTS2 [Relevant Policies](#):

- minimise the connectivity and cost disadvantages faced by island communities and those in remote rural and rural areas, including safeguarding of lifeline services
- ensure transport in Scotland is accessible for all by supporting the implementation and development of Scotland's Accessible Travel Framework
- remove barriers to public transport connectivity and accessibility within Scotland
- improve sustainable access to healthcare facilities for staff, patients and visitors
- ensure sustainable, public and active travel access to employment, education and training locations
- implement measures that will improve perceived and actual security of Scotland's transport system

NTS2 [Equalities Assessment Framework](#) **Island Communities**: Increase the economic prosperity of and address the unique challenges faced by island communities:

- Protect and increase the economic prosperity of island communities
- Effectively address the unique transport challenges faced by island communities
- Effectively address the unique economic challenges faced by island communities
- Effectively address the unique social challenges faced by island communities
- Protect and enhance quality of life for island residents

The NTS2 states: *'In addition, in line with the Islands (Scotland) Act 2018, we will continue to ensure that the transport system works for our island communities and delivers what they need from island connectivity, recognising the importance of ferry and air services to overall journeys. Whilst alternative modes of transport to car use must be encouraged, we also need to accept that car ownership is not a luxury but a necessity for many living and working in rural areas. For this reason, this Strategy will take a realistic and staged approach to the use of vehicles in rural areas that recognises the practical realities of travel in many rural areas.'*



## Transport Scotland

The Comhairle has previously highlighted key ‘pinch points’ regarding the services for the Sounds of Barra and Harris, and also by requesting advancement of both the replacement vessels to Phase1 of Transport Scotland’s SVRP. A request has been made to station MV Loch Bhrosda in Lochboisdale as a back-up resilience vessel.

During biannual consultations on the ferry timetables for the following summer and winter season, communities in the Western Isles have made requests for additional sailings across both the Sounds of Barra and Harris. Subsequently, the undernoted studies were commissioned in 2022 by HITRANS, HIE and the Comhairle, and the final publications shared with Transport Scotland.

### Sound of Harris Ferry Service: Socio-Economic Case for Timetable

**Enhancements: Final Report** - *The case for the timetable enhancements is evident in, first, the traffic forecasts indicating **potential for significant increase in demand** for use of the Sound of Harris service. In addition, some existing trips could now be made at more suitable times, saving both time and costs. Second, the strategic case is strong. The options considered help to address the main issues for improving the economy and quality of life for residents. That is by more fully meeting household, business and visitor travel needs. That would be through providing sufficient capacity, greater day trip opportunities, ability to travel at short notice, and access to a number of mainland and inter-island transport services. An issue raised by consultees and in our surveys was greater integration of the timings of the two Sounds services. However, an increased number of sailings-and ones at new times of the day-will still offer greater opportunities for more efficient journeys between the Southern Isles and Lewis/Harris.*

**QUANTIFIED IMPACTS:** *It shows a total of around £630,000 of output, £300,000 of GVA and £30,000 of household benefit (i.e. cost savings). Option A accounts for the vast majority of the impacts. We reiterate that these results reflect only the impacts that can be quantified. They do not include other significant benefits-e.g. increased sales by non-tourism businesses.*

### Sound of Barra Ferry Service: Socio-Economic Case for Timetable

**Enhancements: Final Report** - *The case for the timetable enhancements is evident in the traffic forecasts indicating **potential for significant increase in demand** for use of the Sound of Barra service. In addition, some existing trips could now be made at more suitable times, saving both time and costs for personal and business travel. Second, the strategic case is strong. The options collectively address the main issues for improving the economy and quality of life for residents-including access to health appointments. That is by more fully meeting household, business and visitor travel needs. That would be through providing increased capacity, greater day trip opportunities, enhanced ability to travel at short notice, and improved access to mainland and inter-island transport services. As above, in itself an increased*

## Transport Scotland

*number of sailings-including ones at new times of the day will still offer greater opportunities for more efficient journeys between Barra and Lewis/Harris*

**QUANTIFIED IMPACTS: It shows a total of around £540,000 of output, £320,000 of GVA and £90,000 of household benefit (i.e. cost savings). Option A accounts for most of the impacts. We reiterate that these results reflect only the impacts that can be quantified. They do not include other significant benefits-e.g. increased sales by non-tourism businesses.**



Item\_15\_Appendix\_ Item\_15\_Appendix\_  
A\_-\_Sound\_of\_Barra B\_-\_Sound\_of\_Harris



The STAG Outer Hebrides Appraisal in 2019 identified two Sound of Harris service options: Extend the length of the operating day in summer; and, Introduce a second year-round vessel onto the route. The second option provides a major capacity benefit. It would also provide a major connectivity benefit by doubling the frequency of the service, a particularly key issue in the core winter timetable when the service is reduced to two return sailings per day. For the Sound of Barra options identified were: Introduce a second summer vessel onto the Sound of Barra route; Extend the length of the operating day on the Sound of Barra. Notably, the appraisal stated that the route profiles systematically also underestimate capacity utilisation in the Outer Hebrides fleet as estimates of PCU equivalents are far longer and wider than cars.

Inter-island connectivity is also vitally important providing resilience in terms of facilitating travel to an alternative port when a service is cancelled or disrupted.

Feedback from the Barra community indicates that crew transfers from the Sound of Barra service to cover some Major Vessels cancellations/disruptions elsewhere are negatively impacting on the Sound of Barra connection e.g. five cancellations over the past month. An urgent need has been highlighted for double crewing that would sustain the service, eliminate the cancellations, and provide an improved service to these communities. Furthermore, there is community frustration that this situation is going to continue for months and years, further negatively impacting already fragile communities. There was also concern in the local community regarding the likelihood of the MV Isle of Arran providing the service to Castlebay. That would undoubtedly have affected the service and economic needs of Barra and added further pressure on the Sound of Barra services.

Despite the publication of the above referenced Socio-Economic reports these enhancements have not been realised through Transport Scotland.



## **Transport Scotland**

Transport Scotland indicated that any changes to the current timetables which are not cost neutral would require in the first instance a strong business case to support any increase in the frequency of services and/or the operating day that would come at additional cost to the contract.

These studies help to provide a robust methodology for fully understanding the socio-economic case that ferry services provide, alongside the quantified impacts. They involved detailed consultation with both Transport Scotland and Cal Mac to help fully understand the operational constraints and opportunities for the timetable including crewing, and any knock-on impacts of potential changes. It also involved detailed analysis of existing carryings and the types of trip being made.

## **Freight**

The Scottish Parliament's Net Zero Emission Transport (NZET) Committee recommended reconsideration of wider policy on the provision of freight capacity on our ferry routes; and the point at which profitable businesses should no longer be reliant on public subsidy of their freight costs.

**Q19. In what way do you think the costs of island freight transport could be shared differently between users and public funding?**

## Transport Scotland

Campervans/Motorhomes are booked by length, but often spill over into an adjacent ferry lane on account of their width. This has a major impact on vessel carrying capacity. A raised tariff for the motorhomes of non-residents should be considered on account of width and weight, and as the scope of the proposed Visitor Levy includes only motorhomes booked at a campsite.

Subsidising independent motorhome travel to the islands via RET while excluding all commercial traffic from RET is incongruous. Following the 2022 price rise for motorhomes, a 10-metre artic truck delivering food, building materials etc to the islands cost more than three times the same length of motorhome. This is contributing to the high cost of living in the islands. Tagasa Uibhist, in partnership with Nourish Scotland, [conducted a study in 2023](#) to look at the affordability and accessibility of basic fruit and vegetable items in Uist and Barra, comparing these findings with mainland data. The research findings evidenced that people living in Uist and Barra are disproportionately more disadvantaged in terms of affording and gaining access to basic fruit and vegetable items. Less than half of the shopping list items were easily accessible and furthermore the total basket cost was 28% more expensive than a Tesco Online shop.

[The Cost of Remoteness](#) indicates that weekly travel costs in different MIS budgets (2021), vary from 28% to 132% for islanders more than urban UK, depending on household composition with single pensioners worst affected, followed by pensioner couple households. As stated the Business and Regulatory Impact Assessment, rather than being carried out on the overall Islands Connectivity Plan, requires to be by community. To explore freight issues in more detail the Freight Fares Review needs to be brought to a conclusion in the short term, as this is long overdue, rather than in the medium to long term as advocated in the Strategic Paper.

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.

Furthermore, regarding the Ullapool - Stornoway route, the expectation of compliance with the ban on biodegradable municipal waste is a need to provide capacity for an average of approximately 8 - 10 full artic loads of waste per week.

As peak waste arisings will coincide with peak seasonal demand for ferry capacity, the need could be as high as 12- 14 loads per week in the summer months.

## Vessels and Ports

To renew the vessel and port assets, required for the long-term sustainability of our current networks, prioritising where to invest is required due to budget constraints in the current financial environment. We are proposing that the following factors are taken into consideration when making decisions on prioritisation:

- The sustainability of ferry services by maintaining and increasing reliability and resilience.
- Ferry routes and services providing the primary transport connection for people, goods and services required for the sustainability of each community.
- Those communities identified as at greater risk of depopulation and economic decline.

**Transport Scotland**

## **Q20. Do you agree or disagree that these are the right factors to consider when making decisions on prioritisation?**

☒ Agree

Ominously, Transport Scotland state in their ICP: Strategic Approach Consultation Draft 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 our 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.

Investment in Western Isles services must be maintained and increased. The ICP’s Investment Prioritisation methodology proposes three elements for prioritisation “where affordability requires difficult decisions to be taken”. It should be noted that the Western Isles clearly meets all three elements: a) the sustainability of ferry services by maintaining and increasing reliability and resilience (of all services, the Western Isles network requires the most investment simply to stand still); b) ferry routes and services provide the primary transport connection for people, goods and services required for the sustainability of each community (as distant islands, the Western Isles’ only option for import of goods and services is the ferry network while air travel for people can be prohibitively expensive); and, c) those communities identified as at greatest risk of depopulation and economic decline, as identified by Government (the Scottish Government’s Depopulation Action Plan identifies Western Isles and Inverclyde as the only Council areas with more people leaving than arriving.

☐ Disagree

Resilience, reliability, affordability and sufficient capacity for private travellers and freight should be the primary considerations, while including the prioritisation of the islands facing depopulation and economic decline as stated above (includes Na h-Eileanan an Iar). By definition, these will be the more distant islands with the most difficult connectivity challenges and Transport Scotland should ensure that the needs of the community come before the needs of the operator. Sustrans [research](#) has evidenced that Transport Poverty in Na h-Eileanan an Iar is the highest in Scotland. Island residents have the right to reliable and affordable transport connectivity as a public good provided by Government whatever the cost. It is regrettable to hear Transport Scotland talk about the cost of ferry subsidy being unsustainable. The logical conclusion of this train of thought is that islands should not be supported since the transport system to and from them is a market failure. These are precisely the circumstances under which Governments should be investing to sustain population.

Please explain your answer.

## **Q21. Currently the factors above are not ranked. Do you think they should be?**

☐ Yes

☒ No

Please explain your answer.

The three factors are equally important and place an obligation on Transport Scotland to provide a reliable ferry service on all lifeline routes, while prioritising those islands in economic decline or facing depopulation. The latest census data between 2018 and 2028, indicates the population of Na h-Eileanan an Iar is projected to decrease from 26,830 to 25,181 (or 6.1%), compared to a projected increase of 1.8% for Scotland. Transport Scotland therefore have a duty to prioritise the Western Isles for investment so that lifeline transport links are reliable and resilient and so that primary routes for people, goods and services (where there is no alternative) are maintained and developed to cope with new demands.

## **Low Carbon and Environmental Impact**

A Strategic Environmental Assessment will be carried out on the Islands Connectivity Plan. This process aims to ensure environmental and sustainability aspects of the Plan are captured and considered in the development of policies and plans detailed in the draft Islands Connectivity Plan.

### **Q22. What environmental issues do you believe should be captured in the Strategic Environmental Assessment in relation to this plan?**

Please explain your answer.

Existing ferries are grossly polluting. In one year, the MV Loch Seaforth consumes almost 8 million litres of Marine Gas Oil (Scottish Parliament Written Question, 2019). The pace of decarbonisation across the CMAL fleet must accelerate rapidly.

The Scottish Government committed in the Climate Change Plan to 30% of the ferry fleet, owned by Scottish Government, to be low emission by 2032. The Scottish Government is committed to looking at how we can use hybrid and low carbon energy resources for the fleet, which is currently taking place through the small vessels replacement programme.

## Transport Scotland

### Q23. Do you have any other suggestions in how ferry services can contribute to the reduction of carbon emissions?

Please share your views.

A rapid transition to low carbon power systems and decarbonisation of port operations. At present, there is a perception that electric vehicles are more susceptible to fire, that an uncontrollable EV fire on a closed deck ferry could be catastrophic and that ferry crews are not adequately trained for dealing with EV fire. Transport Scotland should lead on an awareness campaign around EV's on ferries, ensuring that risks are demonstrably minimised and crews fully trained.

## Ferry Fares

The Road Equivalent Tariff (RET) system of fares is in place across the Clyde and Hebrides Ferry Service (CHFS) network for passengers, cars, coaches and small (under 6 metres long) commercial vehicles. A different fares structure remains in place for the Northern Isles.

A key aim of RET was to allow ferry users to pay a fixed element plus a rate per mile travelled, which is linked to the cost of the equivalent journey length by road in a private vehicle. RET also resolved many previous issues of complexity in the fares offering and fare-inconsistency across routes, within the CHFS network.

The 3 key principles of RET are:

- **Simplicity and Transparency** - the basis for fares must have an established rationale and simple for a user to understand.
- **Comparability and Consistency** - the basis for fares should be the same for each community.
- **Public Sector Affordability versus Community Sustainability** - fare-setting needs to balance the different requirements of public sector affordability with sustaining communities.

**Transport Scotland**

**Q24. Do you agree or disagree with retaining the current RET principles set out above, as the basis of a ferry fares structure?**

- ☒ Agree  
☐ Disagree

Please explain your answer.

The term 'Road Equivalent Tariff' is misleading and confusing as RET, including its fixed element, does not reflect the cost to the motorist of driving the same distance. According to the RAC Foundation, the cost per mile for the average family car in tax / insurance, maintenance, vehicle financing and fuel / oil is £0.63. Travelling the 50 mile distance of the Loch Seaforth's Stornoway to Ullapool route on a true 'Road Equivalent Tariff' would therefore cost the motorist £31.50 when the RET ferry fare, one way, is £66.00 (car and driver).

Having said that, RET is a valuable benefit for the island economy and should be retained although the general view seems to be that RET fares are still too high. The Fares Review suggests that RET may be removed for 'non-island residents' but this could penalise islanders living on the mainland, students and friends, families of island residents, and have a considerable impact on the Visitor Economy where there has been much local investment, and will be also difficult to administer and enforce.

Introducing different levels of fares such as "islander fares" on Clyde and Hebrides Ferry Service routes, could increase overall fare revenue and keep services more affordable for islanders. It could also allow use of different fare types to tackle overcrowding of vehicle-deck capacity, on busier sailings through the year.

**Q25. Do you agree or disagree with the option to create different levels of fares for different types of users, e.g. islander and non-island residents.**

- ☐ Yes  
☒ No

Please explain your answer.



The fundamental problem here is lack of ferry capacity. Transport Scotland should be addressing that with more vigour rather than penalising certain classes of traveller to restrict capacity. Had the Comhairle's strong recommendation for two smaller ferries, running back-to-back on the Stornoway route, been listened to by Scottish Government in 2012 – 2014 ferry capacity would not be an issue. Instead, the single large Loch Seaforth ferry was introduced by the Scottish Government in 2015, and was full to capacity by July and August 2017 with demand growing strongly year on year. The 2016 Ferry Availability Review showed that, on the Little Minch route, between one half and one third of sailing days between June and August were full and the situation has worsened since then.

Clarification is required on this consultation question. A revised fare structure implies the removal of global RET and the introduction of fares differentiated by traveller type. Will the proposed 'Islander Fare' be discounted from the existing RET fare or will the existing RET fare be retained for islanders while other categories of traveller are charged more? While RET has been a welcome innovation, it is still widely considered to be too expensive.

Penalising 'non-island residents' would not be an acceptable way of proceeding since many 'non-island residents' have strong island connections. They may be family or friends of island residents, may have a residence in the islands and work on the mainland, may be island students and so on. Many second home owners are from the island and retain the family home while living and working on the mainland. There should be no fare differentiation between residents and non-residents. A far more equitable and simpler way to manage capacity downwards while safeguarding the right to affordable travel for those with island connections is to retain the current RET fare structure while adding a surcharge to non-resident motorhomes in peak periods as explained above in Q.19.

Scotland's Railway receives some of the highest public subsidy anywhere in the UK where two thirds of the costs come from the Scottish Government; this is not referenced in the Strategic Approach Paper. This is the same subsidy ratio as the ferry services.

## **Q26. Which of these groups do you believe should be eligible for islander fares?**

☐ Permanent residents

### Transport Scotland

- ☐ Second homeowners
- ☐ People who work, but do not live, on islands
- ☐ Island residents who are currently students and living at mainland addresses during term-time
- ☐ Service providers
- ☐ Nominated friends & family
- ☒ **None - Retention of RET for all**

## Q27. Do you agree or disagree with a fares structure that both encourages passengers to travel without a private vehicle and incentivises travel at quieter periods?

- ☐ Agree
- ☒ **Disagree**

Please explain your answer. If other, please add further information.

No. In the islands, the private car is a necessity. Public transport cannot effectively serve the entire community when the sparse population is widely dispersed over a huge geographic area. Many people will travel to the mainland to visit relatives, attend to business or purchase and collect bulky household items not available in the islands. These travellers cannot be expected to switch from one mode of transport to another to get to their final destination, particularly when they have no experience or knowledge of the complex travel systems within Scottish cities. For those travellers transporting bulky household items, they cannot be expected to decant these items from a hire car or bus at some distance from the vessel, wrestle them up the passenger access system (which may be out of use), find stowage for them on board, wrestle them back down the passenger access system and carry them some distance to the destination port car park.

By all means, provide enabling systems that might encourage people to travel without a car, for instance a seamless port to destination luggage / bulky goods carrier service, but travellers should not be penalised by the fare structure for travelling with a private vehicle. The fact that a ferry may not be able to accommodate that vehicle in peak periods is the fault of ferry planners and not the travelling individual. And carbon concerns around larger vessels can be addressed by fleet decarbonisation. Nowhere else in the UK are travellers forced to change travel modes mid-journey by a financial disincentive so this area is another that should be rigorously island-proofed through an ICIA.