



**TRANSPORT
SCOTLAND**
CÒMHDHAIL ALBA

Consultation on the Islands Connectivity Plan: Strategic Approach & Vessels and Ports Plan

Analysis report

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Introduction

This report presents an analysis of responses to a public consultation, along with a number of engagement events held by Transport Scotland officials, on the Islands Connectivity Plan: Strategic Approach and Vessels and Ports Plan.

The qualitative analysis and reporting of the evidence gathered have been undertaken by independent social research organisation, Craigforth (the Consultant), on behalf of Transport Scotland.

Background

The purpose of the Islands Connectivity Plan (ICP) is to set out how ferry services, supported by other transport modes, will be delivered, and strengthened, working towards a long-term vision, and supported by clear priorities and defined outcomes for people and places. The ICP is replacing the Ferries Plan 2013-2022 and is being developed within the context of the National Transport Strategy and the National Islands Plan and is being informed by the outcomes of the Strategic Transport Projects Review 2.

The [Strategic Approach paper](#) is one part of the ICP and proposes an overall Strategic Approach to island transport connectivity including ferries, aviation, fixed links and onward and connecting travel, especially addressing the strategic challenges facing Clyde and Hebrides Ferry Services (CHFS) and Northern Isles Ferry Services (NIFS). The Strategic Approach paper can be applied to all domestic ferry services, including commercial/freight services, while respecting the autonomy of local authorities to develop their own standards and their accountability to local electorates for the design and delivery of ferry services for which they are responsible.

The ICP includes a series of elements: Vessels and Ports Plan; (Refreshed) Community Needs Assessments; Ferry Fares Policy; Low Carbon; and Onwards and Connecting Travel. Alongside the draft Strategic Approach paper, Transport Scotland has published the updated draft [Vessels and Ports Plan](#) (VPP) for the CHFS and NIFS networks.

The public consultation exercise on the two documents was launched on 1 February 2024 and ran until 6 May 2024. The [consultation documents](#) are available on the Scottish Government's website and, where consent has been given to publish the response, it may be found in the [consultation responses](#).

Profile of responses

A total of 197 responses were available for analysis: Most of these (163 responses) were submitted through the Scottish Government’s Citizen Space consultation analysis platform. A further 34 responses were available that had been sent directly to Transport Scotland. Some of these followed the question structure set out in the consultation and a small number were statement style responses. The content of these latter responses has been analysed at the most appropriate consultation question.

Respondents were asked to identify whether they were responding as an individual or on behalf of a group or organisation. Group respondents were allocated to one of eleven groups by the consultant. A breakdown of the number of responses received by respondent type is set out below, and a full list of group respondents appended to this report as Annex 1.

Table 1 – Respondents by type

Type of respondent	Number
Community Council, Development Trust or Transport Forum	10
Energy related business or group	5
Ferry Board, Committee or Group	6
Local Authority, Regional Transport Partnership (RTP) or Community Planning Partnership (CPP)	10
Port or harbour authority	2
Public Body	6
Third sector or campaign group	5
Tourism organisation or business	4
Trade Union	2
Other private sector business or group	6
Organisations	56
Individuals	141
All respondents	197

The majority of the 197 responses (141 responses) were submitted by individual members of the public. The remaining 56 responses were submitted by organisations or groups. The ‘Community Council, Development Trust or Transport Forum’ and ‘Local Authority, Regional Transport Partnership (RTP) or Community Planning Partnership (CPP)’ groups had the highest number of respondents.

In addition to undertaking the online consultation, Transport Scotland held a number of engagement events. They visited 23 locations, holding a mix of discussion and drop-in events. The discussion events focused on three themes of: community voice and transparency; accessibility; and onward and connecting travel.

The events were held in Barra, Coll, Gigha, Harris, Iona, Islay (Bowmore and Port Ellen), Jura, Kerrera, Lismore, Mull (Fionnphort and Tobermory), Orkney (Kirkwall, Stromness, Eday and North Ronaldsay), Raasay, Shetland (Lerwick, Sumburgh, Brae, Whalsay and Yell) and the Small Isles (hosted on Eigg with participants from Eigg, Muck, Rum, and Canna). The numbers attending ranged from one or two up to over 30 participants.

Transport Scotland recorded both verbal and written feedback from those attending the events, analysis of which has also been included within this report.

Analysis and reporting

The report presents a question-by-question analysis of answers to the closed questions. The analysis uses variable bases i.e. includes only those who answered the closed question. Please note that percentages may not sum to 100% due to rounding. It should also be noted that, given the sample size, the results should be seen as indicative rather than statistically robust.

Feedback from the events has been analysed at the most appropriate questions (primarily at Questions 4-9), with summary analysis of views expressed at the community engagement events presented in text boxes.

The analysis of further comments made is qualitative. If a point was more frequently raised this will be indicated, but otherwise the focus is on setting out the range of issues raised. This approach reflects not only the relatively small and self-selecting sample, but also the nature of qualitative data of this type. For example, comments may vary considerably in both length, focus and precision. Some may address the question directly; others may make more general observations. Given this diversity, it is often the case that specific points have been made by only one or a small number of respondents.

It is also important to note that an analysis of this type reflects the comments made and does not seek to verify the accuracy of those comments or make any judgment on the views expressed.

Finally, and as with any public consultation exercise, it should be noted that those responding generally have a particular interest in the subject area. Therefore, the views they express cannot necessarily be seen as representative of wider public opinion.

Biographical information on respondents

The main consultation asked respondents six questions about themselves and their use of the ferry network.

Which statement best describes your living situation?

Table 2: Living situation of individual respondents

Respondent	I live on a Scottish island or peninsula the majority of the time	I live on the mainland the majority of the time	Prefer not to say	Total
Individuals	107	28	2	137
% of individuals	78%	20%	1%	99%

A majority of Individual respondents – 78% of those who answered the question – said that they live on a Scottish island or peninsula the majority of the time. Given the sample sizes for living on the mainland and an island or peninsula, there is limited scope for comparison between the two. However, taking their comments overall, there was nothing to suggest any clear differences in views depending on where people lived the majority of the time.

If you live on a Scottish island or peninsula, please state which one.

Islands and peninsulas where individual respondents live for the majority of the time, broken down into local authority area, community, and the total respondents in each area.

North Ayrshire Council = 12

- Arran = 12

Argyll and Bute Council = 40

- Bute = 3
- Coll and Tiree = 2
- Colonsay = 2
- Gigha = 2
- Islay = 9
- Jura = 1
- Lismore = 5
- Mull and Iona = 9
- Cowal Peninsula = 1
- Rosneath Peninsula = 5
- Kintyre = 1

Comhairle nan Eilean Siar = 15

- Barra = 3
- Lewis and Harris = 9
- Uists = 3

The Highland Council = 8

- Eigg = 5
- Skye and Raasay = 2
- Ardnamurchan Peninsula = 1

Orkney Islands = 18

- Orkney Mainland or unspecified = 7
- North Isles = 10
- South Isles = 1

Shetland Islands = 11

- Shetland Mainland or unspecified = 6
- Unst and Yell = 3
- Whalsay = 2

All areas = 104

Of the 107 Individual respondents who indicated that they live mainly on an island or peninsula, (Table 2) all but three provided further information about which one. The individual island/peninsula indicated most frequently was the Isle of Arran, while the largest number of respondents overall lived in Argyll and Bute.

Please select your age bracket:

Responses for individual respondents are set out in Table 3 below.

Table 3: Responses by age bracket (figures rounded to nearest whole number)

Respondent	16 to 18	19 to 21	22 to 34	35 to 44	45 to 54	55 to 59	60 & over	Prefer not to say	Total
Individuals	1	1	6	11	18	24	71	5	137
% of individuals	1%	1%	4%	8%	13%	18%	52%	4%	100%

Respondents were most likely to be within the 60 or over age group (52% of individual respondents). Overall, the proportion of respondents within each age group fell as age decreased, with only 1% of respondents in either the 16 to 18 or 19 to 21 age brackets.

Although the number of respondents in the younger age groups is low, the analysis did consider whether the perspectives of younger people (in this case the eight respondents who identified themselves as being aged 34 years or younger), was broadly in line with respondents overall. There was nothing to suggest that the views of younger people differed from those in older age groups in any substantive way. This included for the four respondents in the younger age groups who also identified themselves as living on an island.

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?

Responses for individual respondents are set out in Table 4 below.

Table 4: Responses by health or disability status

Respondent	Yes, limited a lot	Yes, limited a little	No	Prefer not to say	Total
Individuals	20	6	101	7	134
% of individuals	15%	4%	75%	5%	99%

Although the majority of individual respondents (75% of those answering the question) said their day-to-day activities were not limited because of a health problem or disability, 4% reported that they were limited a little and 15% that they were limited a lot.

What do you mainly use the ferry services for?

Responses by respondent type are set out in Table 5 below.

Table 5: What do you mainly use the ferry services for?

Respondent	For Business	For Work/ Education	For Personal/ Leisure	All of the above
Community Council, Development Trust or Transport Forum	4	0	3	5
Energy related business or group	1	0	2	2
Ferry Board, Committee or Group	1	0	1	4
Local Authority, RTP or CPP	0	0	0	0
Port or harbour authority	1	0	1	0
Public Body	0	0	0	0
Third sector or campaign group	0	0	0	0
Tourism organisation or business	0	0	1	0
Trade Union	0	0	0	0
Other private sector business or group	0	0	1	0
Total organisations	7	0	9	11
% of organisations	30%	0%	39%	48%
Individuals	21	11	93	35
% of individuals	15%	8%	68%	26%
All respondents	28	11	102	46
% of all respondents	18%	7%	64%	29%

It was possible to select more than one option at this question and percentages are given as a proportion of the number of respondents who selected at least one option

rather than the total number of options chosen (for Organisations n = 23, Individuals n = 136, and All respondents = 159). As a result, percentages do not sum to 100%.

Overall, the most frequently chosen option was using ferries for personal/leisure purposes at 64%. While individual respondents were most likely to use ferries for personal/leisure purposes (68%), organisational respondents were most likely to indicate ferry use for all purposes (48%).

How frequently do you use the ferry services?

Responses by respondent type are set out in Table 6 below.

Table 6: Frequency of use

Respondent	Weekly	Monthly	Occasion-ally	Seasonally (Summer period)	Total
Community Council, Development Trust or Transport Forum	4	2	1	0	7
Energy related business or group	2	0	1	0	3
Ferry board, committee or group	2	0	2	0	4
Local Authority, RTP or CPP	0	0	0	0	0
Port or harbour authority	0	0	1	0	1
Public Body	1	0	0	0	1
Third sector or campaign group	1	0	0	0	1
Tourism organisation or business	1	1	1	0	3
Trade Union	0	0	0	0	0
Other private sector business or group	2	1	0	0	3
Total organisations	13	4	6	0	23
% of organisations	57%	17%	26%	0%	100%
Individuals	37	58	32	8	135
% of individuals	27%	43%	24%	6%	100%
All respondents	50	62	38	8	158
% of all respondents	32%	39%	24%	5%	100%

Overall, respondents were most likely to use ferry services on a monthly basis, (39% of those answering the question) followed by weekly use (32% of those answering). Organisational respondents were most likely to use ferry services on a weekly basis, while monthly use was most frequent for Individuals.

Themes

Key themes

The consultation paper reported that Transport Scotland has gathered feedback from previous relevant engagements and consultations with island communities to identify the areas requiring improvements in relation to delivery of ferry services in Scotland. This resulted in the development of 11 themes, around which the Strategic Approach paper is structured. The themes are:

- 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.

Question 1. Do you think these key themes capture the main aspects of transport connectivity for island and peninsula communities?

Please explain your answer.

Responses to Question 1 by respondent type are set out in Table 7 below.

Table 7: Responses to Question 1 by respondent type

Respondent	Yes	No	Total
Community Council, Development Trust or Transport Forum	5	4	9
Energy related business or group	5	0	5
Ferry Board, Committee or Group	2	3	5
Local Authority, RTP or CPP	6	3	9
Port or harbour authority	2	0	2
Public Body	1	1	2
Third sector or campaign group	1	2	3
Tourism organisation or business	3	1	4
Trade Union	1	0	1
Other private sector business or group	3	2	5
Total organisations	29	16	45
% of organisations	64%	36%	100%
Individuals	100	36	136
% of individuals	74%	26%	100%
All respondents	129	52	181
% of all respondents	71%	29%	100%

A majority of all respondents – 71% of those answering the question – thought that the key themes set out do capture the main aspects of transport connectivity for island and peninsula communities. Individuals were more likely to be supportive than organisations at 74% and 64% respectively.

Around 120 respondents made a comment at Question 1. Although some respondents set out why they had agreed or disagreed at the closed question, many either made general observations about the importance of ferry services, the ICP or one or more of the 11 themes set out in the Strategic Approach paper. Others made suggestions for changes to one or more of the themes, and/or suggested additional themes. Given that the answer given at the closed question tended not to dictate much of the content of the comments, the analysis presented below is thematic, rather than according to whether respondents had agreed or disagreed that the key themes capture the main aspects of transport connectivity for island and peninsula communities.

Positive comments on the key themes

In addition to general comments of agreement with the key themes, there was reference to them being comprehensive. It was also suggested that they reflect the priorities of particular communities, including those of the Isle of Lewis and Harris and Shetland. A community council respondent commented that many of these themes have emerged as key issues through their own community consultation.

Some respondents also referred to how vital these themes and, by extension, the delivery of high-quality ferry services are to the communities and businesses that rely on them. For example, it was noted that Shetland is highly dependent on the ferry link between Lerwick, Kirkwall and Aberdeen, which serves economic and social needs.

There were also references to the importance of particular themes, including from some individual respondents. They were most likely to comment that 'reliability and resilience' and 'capacity and demand' are the main concerns and are the themes that should be prioritised. However, it was also seen as important that none of the themes are viewed in isolation. An example given was that while reliability and resilience of vessels can be enhanced, this needs to be in conjunction with appropriate upgrades to port infrastructure to enable these vessels to operate across the networks.

Issues with the key themes overall

Although sometimes broadly supportive of the key themes set out, some respondents did highlight issues. For example, an individual respondent felt that the concept of a lifeline ferry service appears to be largely absent, with an associated concern that this could be interpreted as the Scottish Government no longer being interested in protecting the viability of some communities through the provision of a ferry service.

It was also suggested that the 'connectivity' element has not been articulated clearly, for example in terms of the planned shape of the network and opportunities to create links where none currently exist. One respondent stated that there is no policy or plan within Scottish Government which currently outlines all the air and ferry routes and services across Scotland and, more crucially, the investment need going forward. Other omissions noted included that:

- The focus is on travel to and from mainland Scotland and gives little to no focus on connectivity to and from outlying islands.
- The ICP is largely ferry focused and does not take other transport services into consideration, including those for some smaller communities where the primary transport connectivity may be by air.

- There is also no mention of islands currently linked by road causeways; in relation to Orkney, the age and condition of some of the causeways was highlighted, as was the major impact on residents and businesses of weather-related closures.

In relation to the themes themselves, there were concerns that the draft Strategic Approach paper does not give a sense of relative priority between them, indicating instead that they are of somewhat equal importance. In terms of those priorities, it was also noted that these may vary from island to island, and that different communities may have different views on how the themes should be prioritised.

The issue of differing needs was also raised, although with a suggestion that it is odd that the published ICP documents (the Strategic Approach paper and Vessels and Ports Plan) have been drawn up prior to a needs assessment being carried out; it was suggested that there needs to be mapping of journeys that people are making to understand the obstacles they face and that a key failing of the draft papers is that they do not focus on the whole of the journey(s) that people need to make.

In addition to general observations, some respondents commented on one or more of the eleven themes set out. The individual themes (excepting local authority services) go on to be the focus of Questions 4 to 19 and, to avoid repetition, comments have been captured within the analysis at those questions.

Local authority services

Local authority services were the focus of a small number of extensive comments. Those commenting included local authority and public body respondents.

A local authority respondent described the omission of ferry services operated by, or on behalf of, local authorities from the Strategic Approach and Vessels and Ports Plan as very disappointing, not least because of the acknowledgement that the challenges these services face are the same as those faced by services directly funded by Scottish Government. There was a call for the ICP to outline all services which are fully revenue funded by Scottish Government and not just those under the direct control of Transport Scotland.

Other key ferry-related points raised included that:

- Replacement of ageing infrastructure on ferry services run/contracted by Argyll and Bute, Highland, Orkney and Shetland Councils is one of the most pressing transport infrastructure issues for those councils.
- The Strategic Approach paper sets out that local authorities are encouraged to adopt the Vision and Priorities but without offering financial support beyond the existing special grant, which covers those councils' direct operating costs but does not specifically provide for future investment.

- Funding and investment must be prioritised to ensure that essential core services are provided to all communities.
- Integration between local authority and CHFS and/or NIFS routes should be considered. One local authority respondent noted that their preferred position would be not to operate any ferry services.

Local ferry route specific comments included that for Knoydart, the Highland Council has a contract for passenger traffic and small freight, but transport of vehicles and larger freight is dependent on an unsubsidised local operator using a landing craft. It was reported that Knoydart is therefore unique in having no government-funded ferry provision for vehicles.

Air services were also referenced, and it was noted that Argyll and Bute Council, Orkney Islands Council, Shetland Islands Council, Comhairle nan Eilean Siar and Transport Scotland subsidise Public Service Obligation (PSO) air service routes and/or airports. It was suggested that air services should be supported by a funding programme, and also that a lack of a joined-up approach to PSO procurement limits opportunities for savings and options to offer additional routes. A respondent requested an update on the Scottish Government's commitment to undertake a Scottish Air Services Review.

It was also suggested that investment in existing fixed links is required, with the Churchill Barriers in Orkney given as an example.

Suggested changes or additions

Respondents suggested a number of additional themes that should be included in the ICP. Economic and tourism development was the most-frequently made suggestion, with further points, all made by one or a small number of respondents, including that:

- Island economies should be included as a stand-alone issue.
- Island ferry services have an important role to play in supporting islanders to access social and economic opportunities and in supporting local economic growth.
- The ICP should look at ferry transport as a catalyst for tourism development, promoting ferry routes as scenic attractions, enhancing visitor amenities, and supporting local businesses to capitalise on tourism opportunities while preserving the cultural and environmental integrity of the region. Given the relative importance of the visitor economy, the ICP should be more explicit about this sector and more specific about its requirements within the key themes.

Other additional themes proposed included:

- Technology and innovation: Embracing technological advancements and innovation in ferry design, operations, and management to improve efficiency, safety, and passenger experience.
- Cultural heritage preservation: Recognising and preserving the cultural heritage, maritime traditions, and historical significance of ferry transport in island and peninsula communities.
- Biosecurity: Having robust biosecurity measures that are consistently adhered to is critical to protecting nature on our islands, particularly seabirds.

Vision and priorities

Based on feedback and discussions with key stakeholders, and drawing on the National Transport Strategy 2 and the National Islands Plan, Transport Scotland has 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.

Question 2. Do you believe the draft vision captures the aspirations of island and peninsula communities for their future ferry services?

Please explain your answer.

Responses to Question 2 by respondent type are set out in Table 8 below.

Table 8: Responses to Question 2 by respondent type

Respondent	Yes	No	Total
Community Council, Development Trust or Transport Forum	6	3	9
Energy related business or group	4	1	5
Ferry Board, Committee or Group	3	2	5
Local Authority, RTP or CPP	4	4	8
Port or harbour authority	1	1	2
Public Body	2	1	3
Third sector or campaign group	3	0	3
Tourism organisation or business	3	1	4
Trade Union	1	0	1
Other private sector business or group	4	0	4
Total organisations	31	13	44
% of organisations	70%	30%	100%
Individuals	84	50	134
% of individuals	63%	37%	100%
All respondents	115	63	178
% of all respondents	65%	35%	100%

A majority of all respondents – 65% of those answering the question – believed that the draft vision captures the aspirations of island and peninsula communities for their future ferry services. Organisations were more likely to be supportive than individuals, at 70% and 63% of those answering respectively.

Around 135 respondents made a comment at Question 2, albeit many of these comments either reflected the range of issues covered at Question 1 or referred specifically to one of more of the four priorities (the subject of Question 3 below).

General comments on the vision

General comments in support of the draft vision included that it captures the main priorities and themes for consideration in the delivery of future ferry services and sets out a suitable overarching vision. They also referred to particular aspects of the vision, including reliability or connectivity being the crucial priorities referenced.

Others commented that, while the draft vision itself is fine, the challenge will come with delivery, and that it can be hard not to feel sceptical after the service disruptions experienced over recent years. There was reference to the draft vision being

admirable, but there being a disconnect between this vision and the current experience of ferry users; it was suggested that island and peninsula communities would need to be very far-sighted to see their future having reliable and resilient, accessible, integrated and low carbon ferry services.

In order to both ensure that the vision is the right one, and help rebuild community trust in the ferry service, a local authority and a community council respondent wanted to ensure that the voice of island communities is reflected in the vision and called for a shift away from communities being consulted and towards meaningful co-design.

Suggested changes or additions

In the interests of inclusivity, a small number of respondents, including a community council and a public body respondent, suggested that the vision needs to reflect the interests of communities served not just by ferry services but also by fixed links. There was a call to recognise the potential of new fixed links, including tunnels. A specific suggestion, from a campaign group respondent, was to replace 'ferry' with 'island and peninsula transport'.

Other suggestions included that, to make the vision relatable and real, it should reflect the impacts upon islanders and their communities. It was suggested that this could be achieved by adding: *For Islanders, this means that the ferries that they use frequently will be on time, will be affordable, be accessible for everyone, will complement how they live their lives, and they will be able to get door-to-door with the upmost ease regardless of how they travel.*

Other proposed additions included explicit reference to:

- Achieving equitable access to public services for island communities where these are not provided locally.
- Sufficient capacity. It was suggested that the vision should capture the importance of sufficient capacity for island residents and businesses, including to allow island economies to grow and prosper. A slightly different perspective, however, was that the vision should refer to the sustainability of island and peninsula communities and populations rather than their growth.
- Small scale businesses and crofters, reflecting the importance that crofting has to island and peninsula communities.
- Resilience, to capture the importance of ensuring there is a ferry service in place that can meet future challenges as they emerge.
- High quality, to aspire to delivering the best possible travel experience for tourists and members of the community.
- Accessibility, to demonstrate a firm commitment to improving accessibility for disabled passengers.

- Being accountable to the communities they serve.

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.

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.

Question 3 – Do you think the four draft priorities reflect what island and peninsula communities see for their future ferry services?

Please explain your answer.

Responses to Question 3 by respondent type are set out in Table 9 below.

Table 9: Responses to Question 3 by respondent type

Respondent	Yes	No	Total
Community Council, Development Trust or Transport Forum	4	5	9
Energy related business or group	3	1	4
Ferry Board, Committee or Group	3	2	5
Local Authority, RTP or CPP	4	4	8
Port or harbour authority	1	1	2
Public Body	1	2	3
Third sector or campaign group	2	1	3
Tourism organisation or business	3	1	4
Trade Union	0	1	1
Other private sector business or group	3	0	3
Total organisations	24	18	42
% of organisations	57%	43%	100%
Individuals	79	53	132
% of individuals	60%	40%	100%
All respondents	103	71	174
% of all respondents	59%	41%	100%

A majority of respondents – 59% of those answering the question – thought the four draft priorities reflect what island and peninsula communities see for their future ferry services.

Around 130 respondents made a comment at Question 3.

General comments on the priorities overall

Comments on the priorities included that they reflect what is needed and that many people will agree with them, including those from ferry reliant communities.

The importance of each island deciding on their priorities for themselves was highlighted, and that priorities may differ across the islands, with a smaller island community council respondent sharing their view that policy is always driven by the louder voices. Other points included that:

- As each island has its own requirements, individual community needs assessments are required.

- The future economic needs of remote communities should be identified, including to ensure that any increase in fares does not impact adversely on the economy.
- There is a need for a consistent range of data on service performance to be collected and communicated clearly to ferry users on a regular basis to identify island priorities for the ferry service. This communication needs to be transparent and easily understood.
- The operator should be required to collaborate with each community to bring forward ideas to improve the service.

It was also noted that, as with the vision, delivery of the priorities will come with significant challenges which should not be under-estimated. There was reference to:

- Recognising that needs will change, meaning that retaining flexibility will be vital, especially given the essential nature of ferry services. There were also calls for the ICP to set out a clear commitment to continuous improvement.
- The need for appropriate infrastructure in order to deliver the priorities, and particularly Priorities 1 and 4. It was noted, for example, that in order for island communities to grow, there needs to be investment and potentially growth within the mainland communities serving these islands.

Priority 1: reliable and resilient

In line with many of the comments at Question 1, a number of respondents noted that they see Priority 1 as being the most important. There were references to uncertainty and disruption, both in terms of recent service levels and the delivery of new ferries and the changes to ports needed to support these vessels. A tourism organisation respondent reported that uncertainty and disruption to ferry services has resulted in the tourism and hospitality sector regularly facing cancellations. In support of fixed links, it was reported that, for example, employers on mainland Orkney Island are reluctant to employ people who live 'the other side' of the barrier, seriously affecting peoples' lives and well-being.

Respondents proposed a number of suggested changes or additions to Priority 1 including:

- Referring to transport services rather than just ferries and acknowledging the challenges for linked isles.
- Recognising that ferry connectivity, capacity and resilience need to be improved if the depopulation and decline in many island communities is to be addressed.
- Being clear that adequate capacity is required to deliver reliability and resilience.

- Adding a reference to customer experience, including how long a journey will take and that it will be a simple and comfortable experience.
- Referring to flexibility to add extra capacity.
- Adding a reference to visitors, to highlight the importance of meeting the needs of visitors and supporting the local visitor economy.
- Changing the reference to a growing economy to a circular economy.

In relation to the delivery of Priority 1, comments included that reliability must recognise performance against the community needs and not be measured against timetables or other measures which do not meet the needs of the destinations. It was also suggested that measurement should reflect all aspects impacting the services and not exclude specifics such as weather.

Priority 2: accessible

Some of the comments on Priority 2 referred to affordability being key to services being accessible. For example, it was suggested that there needs to be more focus on residents being able to afford to travel frequently. There was also specific reference to making travel accessible for young people and children, for example by providing free ferry passes, as is the case with bus passes, for those under 22-years old.

The requirements of those with mobility and/or disability needs were also highlighted, and it was suggested that accessibility for certain groups, for example wheelchair users, is long overdue. A specific example of the current situation provided was that, to date, Orkney Island Council have not found a practical and dignified accessibility solutions for their inter-island ferries. Other points raised included that:

- Accessibility for those with mobility, sensory, cognitive and neurodiverse characteristics and health issues should be considered, as well as broader equalities issues.
- There is a strong connection with Priority 3, since the disjointed timetables that can be incredibly inconvenient for the majority, can make travel uncomfortable and difficult for disabled people or those with mobility problems.

Other themes that respondents identified as affecting accessibility included available capacity and journey length, along with timetabling that supports the use of public transport for onward travel. However, also in relation to travel to and from ports, there was a perception, reported by one local authority respondent, that there is a drive to reduce vehicle numbers on ferries, being justified by environmental arguments, and that this is an “islands proofing” issue. It was suggested that Scottish

Ministers and Transport Scotland should be providing sufficient ferry capacity to ensure that no traveller is disadvantaged compared to their mainland counterpart.

Priority 3: integrated

Relatively few respondents commented specifically on Priority 3, but integration of the ferry services with other modes of transport was seen as an integral part of how a reliable and resilient ferry service is delivered. Other points raised included that:

- Integration should also make a significant consequential contribution to Priority 4: low carbon. For example, it was noted that currently, journeys are disjointed and require costly and inconvenient layovers at certain points making public transport - nominally a lower carbon choice - an unattractive option.
- There should be a focus on transport services that enable sustainable and active travel choices and that make island and other ferry-dependent communities great places to live, work and visit.

Priority 4: low carbon

A number of the comments on the low carbon priority were about its importance compared to reliable, resilient, accessible and integrated services. There was a view that Priority 4 may not be a particular priority for many islanders and most ferry users, and that they would not want a low carbon focus to delay improvements in service. It was suggested that the primary aim must be to get the ferry service running properly, with Priority 4 only applicable providing it does not have a negative impact on delivering Priorities 1 to 3. Related examples and comments included that:

- Adoption of alternative fuels and propulsion technologies must be supported with investment in the required fuel distribution and storage networks to ensure availability at a reasonable cost and frequency and avoid constraints on service delivery and service resilience.
- Recognising the probable increased costs of investment in low carbon technologies, those costs should not be a financial burden to island residents and businesses.

Additional priorities

In addition to comments on the four proposed priorities, there were also a small number of suggestions for additional priorities to be included in the ICP. These included:

- Capacity, as a standalone priority. Supporting comments included that islanders need to be able to make journeys at relatively short notice, and that sufficient capacity is also critical to the visitor economy. Capacity was also linked to frequency and length of the operating day. It was suggested that

islanders should, as a principle, have frequent options to travel when they choose.

- Community voice and transparency, with more decision making by those living on the islands.
- High performance and providing an excellent service. This was linked to improved customer satisfaction and better engagement and communication with ferry users and communities.
- Sustaining population. It was suggested that transport providers have a key role to play in addressing and reversing population trends.
- Biosecurity. There was a concern that, without incorporating biosecurity into the future Strategic Approach and the Vessels and Port Plan, Scotland's islands will remain vulnerable to the threat of invasion by non-native species that could critically endanger native wildlife.

Community voice and transparency

The consultation paper acknowledges the importance of empowering community voice and transparency in communications and notes that 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. It also notes that local authorities and Scottish Government/Transport Scotland use engagement methods such as through project reference groups, stakeholder groups and webpage updates.

Transport Scotland reports that they 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.

**Question 4 – Are there other ways of engaging with communities and stakeholders that would benefit decision making on ferry services, including vessels and ports projects?
Please explain your answer.**

Around 170 respondents answered Question 4.

Listening to the community

One of the most frequently raised points at Question 4 was that, although there have already been many surveys and consultations, those who make decisions about ferry services do not appear to be listening to the communities that use them. Some respondents referenced results of previous surveys and engagement exercises that have not been reported back to them, community requests and suggestions that have not been acted upon or letters and emails that have gone unanswered. There was an associated view that those making the decisions do not understand, or are too far removed from, the problems of living with unreliable ferry services. To rectify this, it was argued that some operator senior posts, including operator board members, should be island based, and that island communities should have their own representatives on the operator's board. The need for greater accountability was also highlighted, with suggestions including appointment of an independent commissioner.

Event participants' views and experiences

Views from engagement events in the CHFS area often reflected the themes outlined above. For example, the event on Kerrera reported a lack of transparency when approaching CalMac with requests, and no indication where these end up, while participants at the event on Gigha felt that they never see any actions after consultations.

People attending events in the Northern Isles reported that Orkney and Shetland ferry services have some different issues to those served by CHFS, and expressed a view that Scottish Government attention is largely focused on the west coast routes. As an illustration, it was noted that the draft Strategic Approach and Vessels and Ports Plan identifies reliability and resilience as key issues, when these are relatively good in the NIFS area. The importance of replacing Orkney's inter-island ferries, and capacity constraints made worse by the removal by the operator of shared cabins on NorthLink services, were often flagged up as important issues at Northern Isles events.

Future community engagement

The need for better or earlier community engagement, and greater community involvement in decision making was another frequently raised issue. Going forward it was argued that further engagement must be 'meaningful' and not what was seen as 'tick-box' exercises with 'predetermined outcomes'. Suggestions included that there should be:

- A standard, transparent process for engaging with all the communities served by the ferry infrastructure, (including those that do not have a Local Ferry Committee) and a consistent route for communities and other stakeholders to influence decisions.
- Clear lines of communication for local communities and stakeholders, for example via a dedicated operator spokesperson on each island or a specific team at Transport Scotland to whom concerns can be communicated.
- Consultation with a wide range of users, potentially targeting groups who may otherwise be unlikely to participate, including young people.
- More direct, face-to-face engagement between decision makers and members of the communities served.

It was also suggested that National Standards for Community Engagement, could provide examples of good practice for improving communication and decision

making, and that the Participation Request process set out in the Community Empowerment Act might be expanded to include and improve decision making around ferry services. These standards can be found at:

<https://www.gov.scot/publications/participation-handbook/documents/>

Event participants' views and experiences

Some participants at events on smaller, more rural, or less populated islands expressed concern that larger islands get more attention or resources. For example, residents on Jura felt overlooked, and attendees on North Ronaldsay felt that, within the Orkney Islands, the Outer Isles communities are pitted against each other, competing for limited services.

Direct engagement with individual community members

The most frequent suggestion was that there should be more direct, face-to-face communication between decision makers (both ferry operators and Transport Scotland) and members of the community. Public meetings, workshops and drop-in sessions were all proposed. Reasons for this position included that project reference and stakeholder groups are not necessarily representative of the wider community, and that not everyone engages with local ferry groups and committees, so these may not represent all local opinion. Another perspective was that, while ferry groups do a good job in representing their communities they can, unfairly, be blamed for poor ferry services.

With respect to practical arrangements for public meetings, suggestions included that they should be held at convenient times, including when they can be accessed by public transport, in the evenings and at weekends, so that those who are working or running businesses can attend. They should be held across the islands in locations that are easy to get to – for example near harbours – and should be advertised well in advance, giving participants enough time to consider proposals. Meetings should provide opportunities to ask questions and/or express concerns and minutes should be recorded.

It was also suggested that more proactive engagement, inviting different type of stakeholders could take place, for example visiting high schools and local businesses. There could also be potential for setting up focus groups with representatives of local businesses, environmental groups, tourism organisations

and local communities to discuss specific issues or concerns associated with specific projects.

Other proposals with respect to methods of community engagement included:

- Providing opportunities to participate in online meetings or webinars.
- Use of social media platforms, including via place-based approaches, to share information, gather feedback and engage with a wider audience.
- Surveys and questionnaires – both across the community as a whole and also onboard surveys for passengers, including the experience of disabled passengers.
- Ensuring inclusivity by also using non-digital communication methods such as local papers, radio, post, and posters on community noticeboards or in ferry waiting rooms. These could be both to advertise meetings or to ask for feedback.
- Providing communications in alternative formats (for example videos, British Sign Language, or Easy Read versions).

Engagement via representative groups and forums

Some users suggested that community engagement could be achieved by working through existing groups, including:

- Community Councils, that could have increased capacity to undertake their own consultative processes on transport links.
- Common Grazings Committees.
- Local Ferry Committees, expanded and resourced to cover as much of the operational ferry network as possible.
- The Ferries Community Board (FCB) on the CHFS network.

There were mixed views on the current operation of the FCB – including that it has an important function and strong track record in representing the interests of ferry users to the CalMac board and that more should be done to raise awareness of the FCB across communities. However, it was also suggested that some FCB members do not provide feedback to the communities they represent. Going forward, suggestions included:

- That how the FCB engages and communicates with local residents should be reviewed.
- That the current membership should be replaced by one chosen on a democratic basis.

- That the FCB should become independent of CalMac and operate as an equal partner with Transport Scotland, CalMac and CMAL in shaping strategic decisions.
- That a democratically elected FCB should have the power to dismiss senior CalMac managers.

Event participants' views and experiences

Some event participants also commented on the FCB, including that there are islands with no representation and that, in the view of some, the FCB is disconnected or ineffective.

Comments on representation via local ferry committees and community councils were varied – including that some bodies may not be representative of the community as a whole, may not communicate with the rest of the community, or may not be very proactive in gathering views. Others do collect and pass on community feedback but find it difficult to get things done.

In terms of engagement with businesses and other stakeholder organisations there were references to opportunities to connect via existing organisations such as:

- Local transport forums – such as the ZetTrans External Transport Forum and the Caithness Transport forum.
- Ferry Stakeholder Groups, which provide an opportunity for both route-specific and network-wide issues to be discussed.
- The Western Isles Major Projects Forum which covers topics such as future freight and supply capacity during upcoming major development periods.
- Specific Project Reference Groups.

Additional suggestions included that there should be greater direct engagement with local businesses and employers including in relation to timetabling and capacity issues. CalMac's new booking system was given as an illustration of a project where taking a more collaborative approach before new systems and processes were developed and introduced could have potentially delivered a better outcome. While island Destination Management Organisations (DMOs) could be used to facilitate proactive engagement with the wider island business community, it was suggested there should be a new forum specifically for freight users, with representation from Transport Scotland, and possibly CMAL as well as CalMac to facilitate decisions that

require funding or are the responsibility of Transport Scotland rather than the operator.

Other suggestions for new bodies included:

- Re-establishing a body such as the Northern Isles Ferry Services Consultative Forum to ensure early engagement with Port and Harbour owners, including third-party ports.
- Establishing stakeholder advisory committees with representatives from various community groups, businesses, and organisations, to provide input and advice throughout the decision-making process.

It was also argued that CalMac ground staff and crew understand how communities are affected by decisions around ferry services and should be part of the engagement process.

Explaining decisions

The importance of acknowledging suggestions from consultees and of follow-up communication to explain the decisions that are made were seen as important, both providing greater transparency in relation to operational matters and allowing consultees to understand how their feedback was considered and addressed. Timetabling was suggested as an issue where this is particularly important. One suggestion was for a single public portal for publishing information on progression of key ferry issues. Another was that reports (on both individual engagement events and on consultation exercises as a whole) should be sent to consultees rather than simply being posted online.

Event participants' views and experiences

Event participants were also looking for greater transparency to allow island communities to understand how decisions are made, for example:

How infrastructure projects are prioritised.

How CalMac's route prioritisation matrix works.

The reasoning behind timetable decisions and why community requests are not being taken forward.

Why shared cabins have been removed on Northlink services.

A number of issues that seem to fall between the remits of Transport Scotland, Calmac and CMAL were highlighted, seen as providing opportunity for too much 'passing the buck', and requiring better definition of roles. For example, at the event on Lismore it was reported that it has not been possible to

resolve issues in relation to operation, tidal restrictions and the slipway. It was commented that Transport Scotland says these are matters for CalMac, but CalMac does not take any action. On Eigg, it was reported that CalMac has told the Community that they are unable to provide a forklift for moving loose freight because Transport Scotland will not fund it.

Regulatory requirements

With respect to impact assessments, a local authority respondent stated that Island Community Impact Assessments (IClAs) in respect of Transport Scotland, CalMac and CMAL reviews, policies, and strategies should assess the impacts on each community.

Accessibility

Transport Scotland proposes 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.

Question 5: Do you think an accessibility standard is a good idea?

Please explain your answer.

Responses to Question 5 by respondent type are set out in Table 10 below.

Table 10: Responses to Question 5 by respondent type

Respondent	Yes	No	Total
Community Council, Development Trust or Transport Forum	8	1	9
Energy related business or group	3	0	3
Ferry Board, Committee or Group	5	0	5
Local Authority, RTP or CPP	8	1	9
Port or harbour authority	2	0	2
Public Body	3	0	3
Third sector or campaign group	4	0	4
Tourism organisation or business	4	0	4
Trade Union	0	0	0
Other private sector business or group	2	2	4
Total organisations	39	4	43
% of organisations	91%	9%	100%
Individuals	117	16	133
% of individuals	88%	12%	100%
All respondents	156	20	176
% of all respondents	89%	11%	100%

A substantial majority of respondents – 89% of those answering the question – thought that an accessibility standard is a good idea. This rose to 91% of organisations.

Around 130 respondents made a comment at Question 5.

The need for an accessibility standard

In addition to a number of suggestions for what should be included or covered by a standard (set out at the next question), there were also comments on some of the wider benefits that a standard could bring or the overall approach that should be adopted. An accessibility standard was described as an essential service requirement that should assist in embedding a disability-inclusive approach across ferry and port operations.

Those who thought that an accessibility standard is a good idea sometimes commented that, in 2024, it should be a given that ferry services are accessible for those with particular needs. However, a number of respondents, including individuals and community council respondents, highlighted some of the problems that they or members of their community encounter when attempting to use ferry services. Some location or service-specific examples provided included that:

- There is no disabled access at Inverie Pier on Knoydart and therefore no disabled access to the Knoydart Peninsula. The open motorboat ferries, such as those for Easdale island and Luing, are also not accessible, as is the current ferry to North Ronaldsay.
- In North Ayrshire, the terminals at Largs, Cumbrae and Lochranza have slopes with substantial gradients that require assistance to negotiate at certain times.
- On a day sailing between Aberdeen and Kirkwall, accessing a cabin is an expensive option for someone who needs to be able to rest on a longer journey; it was reported that the free of charge overnight cabin that is available is of huge value but to only offer this option overnight is short sighted for people with specific needs. The shortage of available accessible cabins was also raised.

Event participants' views and experiences

A number of those attending events referred to the challenges they or members of their community had experienced when travelling by ferry. A few examples included the waiting room on Lismore, including the toilet, not being wheelchair accessible and the gangway access to the Barra ferry being very steep and potentially slippery and to no handrail being provided.

In relation to the ferries themselves, it was reported that as Tiree passengers are already on board, those boarding at Coll can find themselves a long way from the car deck lifts, with reaching those lifts very challenging. It was also reported that some people cannot travel to mainland Shetland on the local authority provided services because of accessibility issues on the ferries used.

Respondents also highlighted some general issues or barriers they had encountered. These included that:

- The CalMac ticketing system will not accept Strathclyde Partnership for Transport (SPT) concessionary passes, meaning holders cannot buy multi journey tickets online.
- The challenges of access for all passengers at ramps and slipways will also require particular attention.
- With car decks tightly packed, people with mobility issues struggle to move between boarded vehicles in order to access passenger areas.

Although most of the examples were of barriers and problems, a small number of positive examples or experiences were also given. These included of staff helping those with special requirements and that the Loch Seaforth provides good facilities for disabled people.

Event participants' views and experiences

Participants raised a very similar range of general issues relating to the accessibility of ports and ferries.

There were reports of waiting rooms being inaccessible and, in relation to boarding that, on some ferries, wheelchair access is only via the car ramp.

Problems moving around tightly packed car decks, particularly for wheelchair users, was a frequently highlighted problem, along with lifts often being out of order. It was also reported that on some ferries there is no disabled access from the car deck to the lounge or to suitable toilets, with passengers having to stay in their cars.

There were reports of staff doing their best to help and support disabled passengers and those with mobility issues. However, although generally positive, there were occasional references to staff not helping to get wheelchairs or other mobility aids onto ferries. It was also noted that staff can only do so much to compensate for inaccessible ferries or port facilities.

In addition to comments on current facilities and services, respondents also highlighted the extent of the need for accessible ferry services. Points made included that some of the areas served by ferry services, such as Argyll and Bute, have a high and increasing proportion of older residents. It was also reported that there is an increasing number of travellers with varying accessibility needs, and that these may be related to mobility, cognition and/or neurodivergence.

There was also reference to people with mental health conditions and those with learning difficulties and to people with sight and hearing impairments. It was also noted that in areas with an older population profile, people are also more likely to need to travel to access to medical support and care.

Question 6: What do you think should be included in this standard?

Please explain your answer.

Around 130 respondents made a comment at Question 6.

Engagement and learning

One of the more frequently made suggestions was that engagement and coproduction should be at the heart of producing any standard. It was also suggested that key stakeholders should be consulted in the development stage, with the Mobility and Access Committee Scotland (MACS) noting that they would welcome the opportunity to be involved. Other comments included that:

- A broad range of needs and disabilities / difference should be represented in the development process, including learning disability and neurodivergence.
- If a user group is established to develop the standard, groups that support people with non-visible disabilities should be included; Alzheimer's Scotland, National Autistic Society Scotland, RNIB Scotland, MS Society and Headway were suggested. The needs of older people travelling could be taken into consideration by working with Age Scotland.
- Specialist services that understand the complex nature of achieving accessibility in a rural context should be consulted.

It was also suggested that it would be helpful to understand what, if any, equivalent accessibility standards exist on other modes of transport and what benefits these have brought. In terms of other potential learning, it was reported that:

- CalMac piloted a scheme on the Loch Seaforth which allowed neurominority people to look around the ferry before taking a trip and book quiet spaces. It was reported that this worked well and could be adopted more widely.
- Edinburgh, Glasgow, Aberdeen, Inverness and Highlands & Islands airports have adopted the globally recognised Hidden Disabilities Sunflower scheme.

It was also noted in the Strategic Approach that an Equalities Impact Assessment (EQIA) will be carried out on the overall ICP, and it was suggested that the EQIA this should be done on a community rather than a network basis to facilitate appropriate mitigations to redress specific needs.

Core components of a standard

General suggestions included that the standard should apply across the network and should set minimum legal requirements for accessibility, enforced with penalties for non-adherence.

There were also references to design requirements to improve vessels and ports to better accommodate disabled passengers, and it was suggested that the design of

new ferries and harbour and shore infrastructure should take full account of the Disabled Persons Transport Advisory Committee (DPTAC) guidance.

Compliance monitoring, audit and review were also seen as important, and there was support for ongoing accessibility audits to support continuous improvement. Specific examples given included detailed review of key ferry terminals to consider physical integration and accessibility.

Staff awareness and training

In addition to suggestions relating to vessels and ports or accessible services, a number of respondents commented on the vital role that well trained staff have to play in delivering an accessible ferry service. For example, it was reported that good customer care and assistance by staff is often viewed as the key factor when deciding if ferry travel is possible, practicable or comfortable.

It was suggested that a standard would assist passenger-facing staff and crew by giving them a better understanding of disabled passengers needs and the ways in which they can support them and would also enable the development of comprehensive training programmes. It was also proposed that Inclusivity and Disability training should be mandatory for all service providers as well as decision makers.

Specific suggestions related to the type and coverage of training included that providers could work with local Access Panels to provide lived experience training. It was also noted that any training should also cover non-visible disabilities.

Event participants' suggestions

Staff being trained on how to help disabled and older passengers, especially around boarding and disembarkation, was seen as very important. There were also calls for training to cover non-visible disabilities. It was suggested that having a designated member of staff to help people with mobility issues would be well received.

Other suggestions relating to how staff could support passengers included providing assistance to reach upper deck facilities or to access food and drink for those who cannot reach catering facilities.

Support and assistance

Respondents often highlighted the importance of staff training because of the vital role they thought good quality support and assistance could play in making ferry services more accessible. They were looking for staff to take a proactive approach, including offering boarding assistance, navigation within the ferry, or in the event of emergency evacuation procedures being required. Specific suggestions included that:

- Crew should be on hand at lifts for passengers requiring assistance to ensure they are seated as close to the lift and other facilities as possible.
- If there was a priority seating area, a particular steward could oversee that area and be available to offer support to any passengers who may need it.

In addition to comments relating to staff providing support and assistance, it was also noted that some passengers may travel with an assistant. Associated comments included that free companion travel should be introduced on ferries as standard. It was noted that this approach is being piloted on rail services, and already applies to concessionary travel by bus.

Infrastructure and vessels

There were a number of suggestions about areas of ports and vessels that could be made more accessible, and a general suggestion that disabled access requirements should be as for public buildings.

In relation to boarding and disembarking, there were calls for:

- Pre-embarkation, a weatherproof shelter that is easily accessible to wheelchair users.
- Ferries to have accessible boarding ramps (not via the vehicle access ramp) or lifts to accommodate passengers using wheelchairs, with mobility aids, or who have difficulty with stairs. More generally, sufficient and working lifts, with alternative arrangements in place if they are out of order.

It was also proposed that, if a port or slip does not meet the accessibility standard, this should be clearly set out in the Vessels and Ports Plan, which should also detail the mitigation measures and procedures that will be included to help users to access the service.

Other specific suggestions included that an accessible standard could or should require:

- Corridors, hallways and open spaces to be free from obstacles and wide enough for wheelchair access.
- Automatic doors.
- Improved access to outdoor areas, including wheelchair access.
- Designated, priority accessible seating areas on the ferry, including spaces with ample room for wheelchair users.
- Quiet rooms and safe spaces available for ferry users when required and further rollout of National Autistic Society-developed sensory bags.
- Accessible toilets, equipped with grab bars, lowered sinks, and adequate manoeuvring space. Specifically, more Changing Places facilities on ferries.
- Accessible height customer services desks.
- Accessible spaces and tables in cafeterias, with a number of designated cafeteria tables to accommodate wheelchair users.
- Cabins built to minimum standards, plus some additional spaces built to a higher standard.
- Designated parking, close to the terminal with easy access and lifts (if required).

It was also suggested that the Accessibility Standard should include repair timescales and repair priorities for accessibility infrastructure.

Event participants' suggestions

Participants suggested a number of ways in which services and facilities could be made more accessible. These included:

Having quiet areas on ferries where people can rest.

Depending on the route, having enough accessible cabins available.

Having fixing points for wheelchairs.

Ensuring that disabled toilets are well designed for people with a range of needs.

Using non-slip flooring and ensuring there are sufficient handrails.

Facilitating travel to and from ports, including buses being accessible or carshare schemes offering accessible vehicles.

Information and booking

In addition to accessible facilities, a number of respondents commented on the importance of clear and accessible communication; an Accessible Communication Strategy was suggested as a mechanism for informing passengers of services and procedures available to support their journey and their right to access these. In terms of the types of information needed, ideas included:

- A clearly set out rating system, with indicators describing the level of accessibility.
- Early and clear communication of changes to services via multiple channels, including email, text alerts and digital channels.
- A visual guide available for boarding and embarking at each port and clearer signage for those who have requested to board early.

With regard to how information should be provided, suggestions included by:

- Ensuring that printed materials, such as schedules, maps, and safety instructions, are available in accessible formats, such as large print, Braille, or electronic formats compatible with screen readers.
- Promoting Relay UK to help people who cannot hear on the phone or have difficulties with their speech by providing a text-to-speech and speech-to-text translation service.
- Signs and signage being of sufficient size and positioning that they can be more easily read by those with impaired sight.
- Having a clear, audible announcement system, with a hearing loop, in terminals and on ferries.

Suggestions relating to the booking system included that ticketing systems need to be more accessible and should allow passengers to purchase tickets, make reservations, and request assistance through multiple channels, including online platforms, phone services, and in-person at ticket counters. There was also a call for disabled passengers with concession cards to be able to get their tickets in advance and have the option to acquire a return ticket if required. It was reported that people currently have to go into a ticket office to book every journey and that this is unnecessary and stressful.

Event participants' suggestions

Improvements to the online booking system were seen as something that would benefit all passengers, but particularly

disabled people, with a specific suggestion that the system should apply accessibility-related discounts correctly.

Other ideas put forward included having visual alarms for people with hearing impairments and additional announcements to let people with accessibility issues know that they need to get ready to board or disembark.

Boarding and emergency procedures

Finally, there were suggestions that an accessibility standard should cover:

- Priority assisted boarding and disembarkation procedures. It was reported that CalMac's early boarding option works well, but that there is not the same support to disembark before others.
- Emergency procedures, with clear emergency evacuation protocols that are accessible to disabled passengers, including designated evacuation routes, assistance protocols, and accessible life-saving equipment.

Introducing a standard

Although generally still agreeing that an accessibility standard should be introduced, some respondents did comment on what may be appropriate or realistic in the short to medium term. In particular, there were concerns that failing to meet any new accessibility standard should not lead to vessels being taken out of service.

It was suggested that most of the current fleet will be below the standards to which Scotland would aspire, and that it may not be a good use of scarce resource to spend money on old vessels that need to be replaced. Further comments or suggestions included that:

- The standard will need to be introduced gradually, and without reducing service provision by condemning older vessels before new ones are available.
- The standard should only apply to new, replacement vessels. It was assumed that the six new ferries due to be delivered over the next few years should provide a level of accessibility far superior to the vessels they are replacing.
- Temporary issues, such as lifts being out of action, should not lead to services being cancelled; early and clear communication, with support to make alternative arrangements, would at least avoid wider disruption to ferry services.

Reliability and resilience

The consultation paper noted that previous community feedback has highlighted that the reliability and resilience of ferry services needs to be seen as a high priority due to the impact on communities, businesses and visitors when ferry services are disrupted.

Question 7: 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?

Please explain your answer.

Responses to Question 7 by respondent type are set out in Table 11 below.

Table 11: Responses to Question 7 by respondent type

Respondent	Agree	Disagree	Total
Community Council, Development Trust or Transport Forum	8	1	9
Energy related business or group	4	1	5
Ferry Board, Committee or Group	2	3	5
Local Authority, RTP or CPP	7	1	8
Port or harbour authority	2	0	2
Public Body	3	0	3
Third sector or campaign group	3	0	3
Tourism organisation or business	4	0	4
Trade Union	1	0	1
Other private sector business or group	3	1	4
Total organisations	37	7	44
% of organisations	84%	16%	100%
Individuals	118	14	132
% of individuals	89%	11%	100%
All respondents	155	21	176
% of all respondents	88%	12%	100%

A substantial majority of respondents – 88% of those answering the question – agreed that the first priority of the ICP should be to improve reliability and increase resilience of ferry services.

Around 140 respondents made a comment at Question 7

As at earlier questions, a number of respondents commented on the importance of improving reliability and increasing resilience, including as the most important priority for the ICP. For example, a local authority respondent highlighted that ferry services to the Western Isles are the equivalent of roads and railways and the nature of these services requires that improvement in reliability and resilience is ranked as the first priority of the ICP.

However, there was also a view that, given its critical importance, reliability should be the minimum standard rather than the priority for a long-term plan. It was also thought important to acknowledge the extent to which it has declined over recent years.

Impact of unreliable ferry services

As context for just how significant the issue is for islanders, a public body respondent noted that Highland and Islands Enterprise (HIE) [‘My Life in the Highlands and Islands’](#) research (2022) found that 45% of islander respondents were dissatisfied with ferry reliability. This rose to 50% amongst Outer Hebrides respondents and 64% amongst respondents in Argyll and the Islands.

Returning to the current consultation, some respondents reported having difficulties in attending medical appointments, social and family events, further/higher education and business appointments. An individual respondent commented that the poor reliability and resilience of the ferry fleet is costing islanders dearly in financial, emotional and health terms.

Personal examples given included an Unst resident writing of being unable to leave the island much of the time due to lack of timetabled travel, weather issues, staffing problems on the ferry or all spaces being pre booked. Another respondent commented that the Kilcreggan-Gourock ferry gets cancelled so often in winter that it has had an impact on their attendance rate at university, and another referred to young families moving away from their island because of the unreliable service.

With specific reference to patients travelling to access healthcare at mainland hospitals, it was reported that fear of missing appointments is a real concern, and patients are often travelling much earlier to ensure they are on time for appointments and treatment. It was also reported that service disruptions are particularly distressing for disabled passengers when they get stranded and need to find accessible overnight

accommodation, often at short notice. It was noted that there can be an impact on their medical and care plans, which can often involve several carers.

As well as the impact on the day-to-day life of people living on the islands, it was also noted that periods of disruption have created problems for hauliers. In relation to transporting goods onto islands, there was reference to goods taking longer to arrive, resulting in shorter shelf life, delays in work programs and extra costs for business. The impact on businesses sending goods off island was also highlighted and it was reported that those sending live shellfish and other items of a time-critical nature are among the commercial customers that have been impacted by the poor reliability and resilience on CHFS.

It was also suggested that there has been a significant impact on tourism to a number of islands, with a lack of resilience, reliability and capacity not only depriving island economies of visitor spending but also causing reputational damage to the tourism product.

Event participants' views and experiences

Participants also highlighted the impact that unreliable ferry services can have on the lives of themselves, their families, and their wider community. Examples given included islanders risking being stranded when visiting the mainland for appointments. It was also noted that, for some islands, school children can be stranded on the mainland if ferries are cancelled during the day.

Although the primary focus was on ferries, participants from islands where flying is an option also reported issues with cancellations and unreliable services more generally.

There was also a view that unreliable transport services are one of the main reasons why younger people do not want to live on islands.

Vital role of reliable, resilient ferry services

Respondents often made the wider point that reliability and resilience of ferry services has an impact on the economic, social and environmental aspects of communities. Some respondents also made a connection to supporting geographical communities to grow and thrive; for example, a local authority respondent stated that reliable and resilient ferry services will contribute to the delivery of the Isle of Cumbrae and Isle of Arran Local Island Plans. There were also references to particular groups, with a public body respondent commenting that a reliable and resilient service is crucial to the holistic success of crofting communities.

Respondents commented that ferries often serve as the primary or sole transportation link for island communities, connecting them to essential services such as healthcare, education, employment, and access to food and other goods. It was therefore seen as crucial that residents can depend on these ferry services for these needs. It was also noted that, in times of emergencies, such as natural disasters or medical emergencies, ferry services may be the only means of evacuation or access to emergency supplies for island communities.

Reflecting this critical role, there was a call from a local authority respondent for an agreed definition, preferably set out in legislation, of a 'lifeline service'. Other suggestions included that data on ferry use related to education, employment or health needs should be recorded to better understand customer needs.

Economic Impact

Improving reliability was seen as key to building greater confidence among tourists and businesses, leading to increased economic activity and investment. It was also suggested that increased confidence in the ferry service will be vital to attracting essential key workers to live on or travel to islands for work. As an example of the scale of the economic impact, a local authority respondent referenced a 2020 report on [The impact of Covid-19 on the Arran economy](#).

For farms and crofts, it was reported that a reliable and resilient ferry service is required for access to markets and to receive essential deliveries for farm businesses – for feeding, fuel or contractors coming on to the islands. More generally, it was noted that a reliable ferry service can be fundamental to whether or not island businesses can continue to compete successfully in domestic and international markets.

An energy business respondent also highlighted a number of major development projects that are planned and argued that these will require a reliable freight service; it was reported that without a reliable service, there could be delays before and during the construction phase of projects which would add significant costs. It was also noted that any delays could have a potential impact on the project benefits to local communities and the money that is injected into the local economy. Examples cited included the Stornoway Wind Farm, the projected benefits of which include an estimated £1 million community fund. It was noted there will also be ongoing maintenance of these large windfarms and associated infrastructure, with personnel based on the islands.

Other factors

A number of other ways in which reliable ferry services are vital to the communities they serve were also highlighted, along with the extent to which many of these factors are interconnected. For example, some respondents referred to increasing cost of living pressures on top of an already fragile economic climate, and to unreliable ferry services exacerbating these problems. While unreliable ferry services were seen as contributing to decisions to leaving the islands, the corollary was that reliable ferry services are essential to retaining population.

It was also suggested that reliable ferry services play a vital role in fostering social cohesion and community resilience by facilitating social interactions, family visits, cultural exchanges, and community events; enhancing reliability helps strengthen the fabric of island communities and promotes a sense of belonging among residents.

Other suggested benefits of resilient and reliable ferry services included:

- Safety and well-being, by contributing to the safety and well-being of passengers and crew by minimising the risk of accidents, delays, and service interruptions.
- Environmental sustainability, by encouraging modal shift from private vehicles to public transportation, reducing traffic congestion, air pollution, and carbon emissions.

Aspects of 'reliability' to be improved

While many respondents focused on the problems resulting from unreliable services and the benefits of reliable services, there were also some comments about what a reliable service should look like. For example, improved punctuality was seen as important.

There were also references to weather conditions and cancellations. There was a view that CalMac has a risk-averse culture and that this is to blame for declining weather reliability. However, an alternative view was that it is sometimes a perception of ferry users that sailings can be cancelled when not justified by weather conditions, and that sharing information from weather monitoring systems should help to improve public confidence in operational decisions made.

Complementary or additional priorities

While sometimes agreeing that reliability and resilience of ferry services should be the first priority, some respondents did point to other changes or improvements that could help increase transport-related resilience overall. This included that fixed links, including tunnels, can be used 24 hours a day and are more reliable than ferries as

they are less likely to break down. There were also calls to look at more opportunities for air services.

With regard to other priorities that may be as or more important than reliability and resilience, respondents were most likely to refer to capacity. Further points made tended to reflect those raised at Question 10.

Other suggestions included that the quality of the customer service, accountability, sustainable and integrated travel, or environmental sustainability are as or more important than reliability and resilience.

Timetable, essential and urgent travel

The Strategic Approach paper notes that as ferry travel has become more popular, on some services it has become more difficult to accommodate short-notice demand for essential vehicle travel by island residents and key workers.

Question 8: 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.

Around 160 respondents answered Question 8, albeit some of the comments considered the wider issues relating to vehicle space on ferries. This included a number of respondents suggesting that the focus should instead be on providing more capacity and meeting demand. It was suggested that, if ferry capacity was sufficient and provided flexibility, the operator would not have these issues in accommodating demand and emergency travel.

An associated concern was that failing to meet demand is damaging to both communities and economic growth. In terms of the local economy, it was suggested that the visitor economy is very important for the future sustainability of many island communities, and that tourists and visitors are often dependent on using vehicles, including because they have luggage.

There was also a view that addressing barriers relating to connectivity (the focus of the next question) would at least make it easier for people to travel without their cars. The issue of RET fares was also highlighted and there were calls for only islanders to be eligible for this rate. Questions 16 to 19 cover fares in more detail.

Urgent travel vehicle spaces

While respondents were most likely to comment on facilitating short-notice or urgent/emergency travel with a vehicle, others called for a more general priority for islanders, particularly during busy periods.

Most of the suggestions were focused on accessing spaces to travel under certain circumstances and generally at short notice. There was reference to emergency or urgent travel spaces being made available for:

- Islanders attending medical appointments, supporting someone attending a medical appointment, visiting family members in mainland hospitals or care homes, the bereaved and those attending a funeral.

- Disabled passengers.
- Key workers.
- People travelling with a vehicle for business-critical needs, such as crofters.
- Unplanned commercial traffic, such as that relating to urgent maintenance and repair work.

A community council respondent that existing medical protocol and advanced standby approaches have been welcome, and should be promoted more widely, but also that arrangements going forward will require careful consideration. A regional transport partnership respondent commented that defining what constitutes 'essential' vehicle travel may be challenging in the extreme, but that it would be vital to have a fair and transparent mechanism for island residents and key workers to be able to book spaces. Other comments or suggestions included that:

- The criteria and decision making must be managed locally.
- A full definition of key workers will be required.
- There should be a dedicated, urgent booking phone number or it should otherwise be made easier for port staff to prioritise ferry users with urgent needs.

Some respondents favoured reserving a proportion of spaces on each crossing for emergency or essential travel, with the space then released if not needed. Specific ideas included:

- Keeping 5% of vehicle space available until within 24 hours of departure.
- Holding back up to five vehicle spaces on larger vessels and one or two on smaller vessels, during high season on the most popular routes.
- Releasing some of the reserved spaces to general sale as the date of travel approaches.
- Implementing a dynamic allocation system that adjusts the availability of vehicle space based on real-time demand and capacity constraints. This allows ferry operators to release additional vehicle space closer to the travel date if capacity allows, while ensuring that essential travellers have priority access.

There was also a suggestion that in emergency situations with a fully booked ferry, traffic should be offered compensation to give up space, similar to airline practices.

Finally, the challenges associated with holding space and managing urgent travel on a non-bookable service were highlighted, including, for example that additional separate queuing facilities may be required at ports/slips and that any arrangements would need to be clearly and fairly communicated and administered.

Event participants' views and experiences

Participants spoke of ferries being full and being unable to book and travel, especially at short notice due to unforeseen events. There were calls for priority to be given to people who need it most, such as medical or fire crews, and people with medical appointments.

An associated point was that being able to cancel bookings without penalties means that sailing can be fully booked, with spaces only becoming available at the last minute. It was also suggested that running additional freight only services would free up space for passengers and cars.

With specific reference to transporting livestock, there was a call for extra sailings, including to tie in with market days on the mainland.

In relation to prioritising essential or urgent travel, it was suggested that the approach being used should be made clear, including through the booking system and by port staff.

Priority booking or staged release

Other comments pointed to some form of general priority reservation or booking system for island residents, essential service providers or emergency vehicles. There were also references to commercial vehicles transporting essential goods.

In terms of possible approaches, it was reported that Coll is currently part of a pilot scheme that reserves deck space up to seven days prior to travel but that, at present, it is not restricted in any way to island residents; a community council respondent suggested that the scheme should continue but must be developed to help those island communities that want to have their travel needs prioritised at all times of the year. Another community council respondent also thought the pilot scheme is a viable proposition but called for it to be tailored to each route. The example they gave was that the Islay community might favour a two-day deck space release, whilst Tiree would much prefer a seven-day release requirement.

Other respondents also favoured offering island residents an advance booking window, allowing them to reserve vehicle space in advance of their travel date. It was also suggested that priority booking should be available to haulage for island-based businesses, especially those in agriculture. In terms of the proportion of spaces to which any advance booking window should apply, specific suggestions included that:

- There should be a staggered release of space on car decks: 70% in the beginning, then 20% the month before and the last 10% in the week before the sailing.
- 30% of all tickets being reserved for ferry users who can prove island residency.
- The proportion of spaces covered under a priority booking system could vary to take account of key events, such as livestock sales.
- Keeping a certain meterage unbookable, so that it can only be booked on the day, on a 'first come, first served' basis.

Others also favoured a proportion of spaces only being available as standby, with a specific proposal to establish a standby management system for residents who are unable to secure vehicle space during the initial booking process.

There were also references to having waiting lists, including that if set aside spaces on a sailing are released for general sale as the date of sailing approaches, there needs to be a fair way of allocating these additional spaces to people that have previously tried to book the sailing. It was reported that under the old booking system, the process of waitlisting for a sailing worked well but that it is no longer possible. An energy business respondent also commented that bringing back a waitlist system (on to which they would be allowed) would help manage 'no shows' and cancellations that happen on the day. They reported that there have been numerous occasions where they have had to put their teams on as foot passengers without their vans only to discover that the ferries are sailing with half empty vehicle decks.

Other booking management suggestions

Reflecting the issue about holding a waiting list, a public body respondent thought that there is an urgent need to ensure that all remaining snagging issues with the new CalMac booking system are dealt with in order that the new system can effectively maximise utilisation of vehicle deck space on vessels.

There were also concerns about the functionality and accessibility of the electronic booking systems; for example, an individual respondent reported that the online system often says a ferry is fully booked, but spaces are available when they call the office. Others also observed that some vessels are sailing partly empty, because the booking system shows the vessel as 'full and unable to book' even when it has available space.

Another issue identified was that booking ahead is limited by the timing of the Scottish Government's approval of fares; it was suggested that it would be helpful if

the booking process was not limited to the period that fares have been approved for (which limits forward booking) and if the system had the capacity to adjust charges to users if they change subsequent to a booking having been made.

Other suggestions had a customer experience and improvement focus. They included:

- Providing clear and transparent information about the booking process, eligibility criteria, availability of vehicle space, and any changes or updates to ferry schedules.
- Establishing a feedback mechanism for ferry users to provide input and suggestions regarding the booking process, including their experiences, challenges, and recommendations for improvement. Using feedback to refine and optimise the booking system over time.
- Working closely with local authorities, other community representatives, and relevant stakeholders to tailor the booking process to the unique needs and circumstances of each island community.
- Evaluating the effectiveness of the booking process regularly through data analysis, passenger surveys, and stakeholder consultations. Identify areas for improvement and implement adjustments to enhance the efficiency, fairness, and accessibility of the system.

Event participants' views and experiences

Problems with booking systems was a frequently raised theme, particularly in areas covered by CalMac services.

In addition to general comments that the new ticketing system does not work, specific issues highlighted included that the system often says sailing are full, when there are in fact spaces, and that passengers using a senior citizen card cannot book online. The on-line booking system was also reported to be difficult for people with visual impairments, including because it does not retain information and tickets are not available in the best format (which would be 'wallet' on a phone).

There were also references to ICT skills and service issues, along with poor mobile coverage, making it difficult to book online or check for service updates.

Integration of services

The consultation paper noted that journeys on Scotland's 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 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.

Question 9: What would encourage you to use public transport or active travel as part of your overall journey when using the ferry services?

Please explain your answer.

Around 180 respondents answered Question 9.

A common theme was that some people might be willing to reduce their car use when travelling by ferry, but only if alternatives are convenient and cost effective, and that this will require co-ordination and investment. Many of the comments emphasised the importance of an integrated transport network and the vital role that reliable and well-connected public transport can play.

Barriers to public transport use

Although a small number of respondents reported that they already use public transport when viable options are available, most explained that they feel it is simply not a realistic prospect for them. It was noted that this applies particularly to the island side of a crossing, and in particular, to anyone living outside the immediate port community. It was also suggested that current infrastructure, the distances involved, the weather, and the nature of island travel does not make active travel practical or desirable in most cases.

Among the main barriers to public transport use noted were:

- Disabled passengers needing to take additional equipment such as mobility aids and medical equipment that make it necessary to travel by private car.
- Travel being business related and often to tight timescales and potentially to remote areas.

- The need to move goods or pick up supplies, including to avoid the high small freight charges on the ferries, or to take luggage.

However, the most-frequently made point was that public transport systems are simply not good enough – in terms of coverage, frequency or reliability – to enable people to leave their cars behind. Examples of location-specific problems provided included:

- No public transport services being available to take people for early morning check-in for the ferry.
- Bus services are reported as being few and far between; for example, on the Isle of Harris, with the first buses running after the first ferry departs Tarbert and the last buses stopping well before the last ferry arrives.
- If arriving into Scrabster, respondents reported needing to get a taxi to Thurso in order to make train or bus connections to Inverness.
- If arriving as a foot passenger into Oban, respondents reported potentially long waits for a bus or train with nowhere to leave luggage while waiting.

More generally, it was noted that the practicalities of travelling with luggage, children, pets and/or mobility challenges, mean that public transport options can be lacking in terms of the current overall journey experience. It was also noted that these challenges can be amplified in the event of disruption to ferry services.

Event participants' views and experiences

Those attending the events raised a very similar range of issues and problems as respondents submitting an online response to the consultation. Participants spoke of local bus services being unreliable, expensive and lacking in number and capacity. One example was buses having a 'school run first' priority, meaning that other passengers, including those with mobility issues, sometimes have long waits.

There were also a number of references to timetabling problems and bus schedules not connecting with ferry times. Examples included island buses not running early or late enough to cater for ferry passengers taking early ferries or arriving on late ferries. In terms of the impact of these types of problems, participants noted that people may have to rely on lifts or taxis, while many simply have to rely on their cars.

It was also noted that, in some places, the distances between the port and connecting bus or train services can present problems, particularly for those with mobility issues.

As well as timetabling and capacity issues travelling to and from ports, people also spoke of why they might need or want

to take their car on the ferry. In addition to needing to transport luggage or shopping, travelling with a car was also described as offering protection from inadequate or unreliable services. Examples included not having to wait if buses or trains are full, delayed or cancelled and also being protected against the impact of delayed sailing resulting in missed connections. Travelling with a car was also seen as offering some flexibility and a safety net when ferry services are cancelled.

Fit for purpose public transport

There were calls to improve the availability and frequency of bus services in many locations; there was a view that subsidised rural and islands bus services have, for the most part, been in decline in recent years, and it was suggested that this is due to reduced funding and falling patronage. It was suggested that new, targeted funding would need to be made available to ensure that there would be the necessary local bus links to deliver improved onward connectivity from ferry terminals.

The regional rail network was also seen as having a key role to play in facilitating onwards and connecting travel, and there were calls for the necessary investment to provide reliable and punctual services that offer good value for money and high levels of passenger satisfaction.

Event participants' improvement suggestions

Participants made a number of suggestions in relation to improving integration between ferry and buses or train services, as well as changes that might enable or encourage people to not take their car on the ferry. These included:

Better connectivity between ferry services, buses and trains. In addition to looking at timetables, there were references to joint responses to service delays and cancellations.

Considering not only the needs of those travelling between islands and the mainland, but also between islands. It was noted that these journeys can also form part of a longer, onward travel plans.

Exploring demand-responsive transport options, and other ways of providing fit-for-purpose public transport solutions.

Exploring Community Car Club opportunities.

Better and more cost-effective car hire options, with operators promoting their use.

Co-ordinated timetables

Along with generally improved services, co-ordinated ferry, bus and train timetables were seen as vital, with minimum wait times and sufficient capacity ensuring that switching between different modes of travel is not only viable in terms of journey times, but also reliable. Reliability was connected to service users being reassured that there is sufficient capacity as well as alignment with connecting services.

However, it was noted that co-ordinating timetables may not always be straightforward and it was suggested that collaboration with the relevant local authorities would be essential to taking this forward, and there were reports that Regional Transport Partnerships are arranging meetings of operators to co-ordinate timetables and promote integration.

Other suggestions for increasing timetable co-ordination, or for enabling travellers to make best use of co-ordinated services, included:

- Providing travellers with real-time information and planning tools that help them navigate their journey using a combination of ferry services and other modes of transport. This could include mobile apps, online trip planners, and signage at ferry terminals.
- Ensuring that the transition from one mode of transport to another is safe, seamless, accessible for all and well signposted to assist with wayfinding, including tactile wayfinding. Passenger assistance between modes should be available.
- Factoring in additional time that some disabled or older passengers may need to transfer between modes.
- Building in some flexibility and systems to respond to delays, for example with trains and buses that wait for ferry passengers if the service is delayed or, where this is not an option, onward travel is provided by the ferry operator.

However, it was also noted that allowing for ferry delays can have a significant knock-on impact for the wider transport network if, for example, buses wait for late-running ferries and are then not available for other services, such as school transport.

Event participants' experiences and suggestions

Event participants also spoke of the impact on ferry cancellations and, in particular, the lack of support that is available when cancellations and delays occur. There were references to lack of any or timely information and inadequate facilities at ports when waiting.

There was also a view that operators need to do more to support passengers in the event of delays or cancellations. In relation to delays, it was suggested that foot passengers could be allowed to board the vessel as soon as possible so that they can at least wait in the warm and dry. In relation to cancellations, suggestions included arranging and paying for emergency accommodation and ensuring that passengers are transported to that accommodation.

Terminals and hubs

Another focus for respondents was the potential to better support customer journeys, including their experience of using public transport, by improving integration at ferry terminals. It was noted that the [Strategic Transport Projects Review 2](#) (STPR2) recommends a detailed review of key ferry terminals to consider physical integration and accessibility improvements in timetable information, signing, ticketing and other facilities required to deliver a seamless and integrated journey between different travel modes.

In terms of the types of issues that may need to be looked at, there was reference to:

- Ensuring that ferry terminals are easily accessible by public transport and active travel modes, such as walking and cycling. It was suggested that this could involve improving pedestrian and cycling infrastructure, providing bike racks, and integrating ferry terminals with existing public transport networks.
- In particular, addressing “last mile” connectivity, by providing convenient and accessible transportation options for passengers to reach their final destinations from ferry terminals. This could include shuttle services, bike-sharing programs, carpooling initiatives, and improved pedestrian infrastructure.
- Having trained staff who understand the challenges of connections and who are able to provide advice and support to non-vehicle travellers, especially at times of sailing disruption.
- Improving waiting facilities for foot passengers, wheelers, walkers, and cyclists.

- Better car parking and facilities for electric vehicle (EV) charging.

It was also reported that HITRANS Regional Transport Partnership is taking forward a study to look at options to provide an improved transport hub in Oban town centre, focusing on the railway station and ferry marshalling area.

Event participants' suggestions

Suggestions relating to ports facilities included:

Ensuring there are adequate parking facilities at ports for those who did wish to leave their cars. It was suggested that park and ride facilities could be particularly popular with visitors to the islands.

Looking at the distances between ports and main public transport options and ways of making those journeys as accessible as possible. There was a reference to signage, but also to ensuring that connections allow passengers sufficient time to make their connections.

Event participants also highlighted the need for, and benefits of, integrated booking and ticketing. Suggestions included having a ticketing app that assists people in planning and booking multi-modal journeys. However, it was also stressed that integrated ticketing must offer the most cost-effective options. Other suggestions included an Oyster Card type payment system.

Integrated ticketing approaches

The other frequently raised issue was the potential of an improved ticketing system, and in particular a system which would allow people to book and buy a through ticket. There were concerns that the new CalMac ticketing system is not integrated with other service providers, and it was suggested that a review would be beneficial, especially since island communities have raised the disruption and stress associated with booking ferry travel.

Going forward, respondents offered a small number of suggestions as to how ferry users could be encouraged to use public transport, including:

- Learning from the Highlands and Islands, the Go-Hi app has been taken forward by HITRANS and has been live since 2021. This Mobility as a Service (MaaS) platform allows travellers in the region to plan, book and pay for their journey across multiple modes, making onward travel easier and more

accessible. It was reported that Serco NorthLink currently fully participates in the Go-Hi platform, but CalMac does not.

- Offering a reduced fares option to users of integrated public transport services. It was suggested that providing fare incentives for passengers who use multiple modes of transport can encourage uptake.

Encouraging active travel

There were calls for continued investment in infrastructure to create safe cycling and walking routes, including creating dedicated cycle routes on islands. However, there was a note of caution from one local authority respondent who commented that the challenging fiscal climate has placed considerable pressure on local authority budget, and this is making it increasingly difficult to invest in sustainable transport infrastructure projects.

Other suggested ways of encouraging active travel as part of a ferry user's overall journey included running public awareness campaigns and educational programmes, providing better facilities for bike storage on ferries, providing cycle rental facilities at ferry terminals and bus services allowing bikes to be transported.

Event participants' experiences and suggestions

Some participants highlighted reasons why active travel can be difficult or unpopular in their experience. Examples included foot passengers being last off the ferry and it was suggested that active travellers need to be able to get off safely and not be held back.

Most of the comments referred to cycling and included that safer routes would encourage more active travelling. Where an option, it was suggested that more cycle routes/lanes should be provided.

Other suggestions included expanding cycle and e-bikes hire options around the islands. However, there was a report that an attempt to promote bike usage on an island (renting for tourists etc.) proved unviable because of high insurance and maintenance costs.

There were also references to providing better facilities for passengers wanting to take their bikes on ferries and encouraging bus operators to enable people to travel with bikes or e-bikes.

Capacity and demand

The consultation paper notes 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. Transport Scotland explained that they propose to address ferry capacity issues by:

- Using refreshed Community Needs Assessments to identify different options for service frequencies and vessel size.
- Collaborating with operators and communities to identify ways of using existing and planned capacity better.
- Identifying the key 'pinch points' on the CHFS and NIFS networks and considering options for additional vehicle capacity where this is practical, beneficial, and affordable.

Question 10: Do you agree or disagree with this approach to dealing with ferry capacity due to increased demand?

Please explain your answer.

Responses to Question 10 by respondent type are set out in Table 12 below.

Table 12: Responses to Question 10 by respondent type

Respondent	Yes	No	Total
Community Council, Development Trust or Transport Forum	6	1	7
Energy related business or group	3	2	5
Ferry Board, Committee or Group	4	1	5
Local Authority, RTP or CPP	5	3	8
Port or harbour authority	1	1	2
Public Body	3	0	3
Third sector or campaign group	1	1	2
Tourism organisation or business	4	0	4
Trade Union	1	0	1
Other private sector business or group	2	2	4
Total organisations	30	11	41
% of organisations	73%	27%	100%
Individuals	88	43	131
% of individuals	67%	33%	100%
All respondents	118	54	172
% of all respondents	69%	31%	100%

A majority of respondents – 69% of those answering the question – agreed with approach set out for dealing with ferry capacity due to increased demand. Organisations were more likely to be in agreement than individuals, at 73% and 67% respectively.

Around 140 respondents made a comment at Question 10.

There were references to the planned approach looking like a good solution, and support for having a better understanding of capacity issues. However, it was also noted that extra capacity has been mooted for a number of years without apparent progress, and that it would not be acceptable to leave things unchanged.

As in comments on a number of other questions, many commented on the scale of the challenge, as well as the critical importance of tackling capacity problems. It was stated that capacity constraints impose costs on island communities, with the negative impact on local visitor economies, including harming vulnerable tourism and hospitality businesses. An energy business respondent reported always experiencing problems during busy periods, albeit they did not identify the route(s) involved.

In terms of the impact on island residents, it was reported that:

- Arran residents have reduced their ferry usage as it is perceived to be impossible to purchase tickets for the services that would facilitate movement on and off the island at suitable times.
- For passengers travelling to and from Shetland, even when booking well in advance, securing a cabin and a vehicle space on the same sailing is reported as being often difficult, and sometimes impossible.

For some respondents, the solution lay in increasing capacity, rather than seeking to manage demand, and it was suggested that any move to disincentivise cars on ferries must be subject to a rigorous Island Community Impact Assessment (ICIA) for each island community. However, there was also an alternative view that the focus should be on optimising current capacity rather than necessarily increasing it. For example, with reference to Arran it was reported that if vehicle traffic increased at the same rate as over the last 10 years, this would result in an increase of 50,000 car journeys on Arran's roads by 2032.

Community Needs Assessments

A number of respondents commented specifically on the plan to use refreshed community needs assessments to identify different options for service frequencies and vessel size, with some specifically noting that they agreed with this proposal.

With regard to the how the refreshed Community Needs Assessments should be undertaken, there was a concern that the Routes and Services Methodology used (for the 2012 Ferries Plan) has since been updated from a 'crossing times' model to a 'crewing model' but that, in practical terms, this amounts to the same thing; namely that communities at most distance from the mainland will receive a lower crossing frequency than those closer. In terms of how the Assessments should be framed, suggestions included enabling community involvement in the design and delivery as critical to success, and that they should be based on metrics and assessment criteria defined in close partnership with island communities across Scotland.

Other comments and suggestions included that:

- It is important that the methodology is fully robust and fully "island proofed".
- Assessments must be done in advance of when increased demands are expected in order to properly plan and accommodate these. Identifying bottlenecks early will be critical.
- The assessments should be led by experts who are independent of the organisations that fund ferry connections, primarily the Scottish Government and local authorities.

- They should be reviewed regularly to ensure that the social and economic needs of communities can be adequately serviced by transportation.

In relation to the focus of the Assessments, it was suggested that they should:

- Include a measure for constrained/unmet demand for each route, so as to fully reflect current and future community needs.
- Consider the economic impact and benefits brought to island communities by visitors.
- Be cognisant of how planned future developments and activity in local economies will affect demand for ferry services.

There were also a small number of specific suggestions regarding who should be involved in or consulted with as part of the Needs Assessment process. As well as the wider community, these included ferry committees and the local and national business community.

Using existing and planned capacity better

Irrespective of their views on extra capacity being required, many respondents thought there are opportunities to use existing and planned capacity better, with a number of suggestions made. These included that engagement with islanders and communities needs to be meaningful, and there were calls for:

- Regular communication between ferry operators and users to be a requirement and informed by regular transport capacity studies linked to estimates of future demand from industry and residents.
- Operators to commit to implementing the communities' suggested solutions to capacity challenges.
- Meaningful stakeholder engagement with tourism and hospitality businesses, particularly accommodation providers, to identify ways of using existing and planned capacity better.

In terms of existing activity, it was reported that CalMac has an ongoing programme of engagement with their commercial customers to track the customer experience; it was suggested that this type of engagement should be utilised as much as possible to provide detailed insights on current and future requirements.

Respondents also made their own suggestions as to how capacity could be managed better. These ideas included:

- Incentivising hauliers to travel on off-peak sailings.
- Running freight only services (covered in detail at Question 11). A particular issue raised here was that, as the Western Isles become home to more

renewable energy developments and other infrastructure projects, the volume of commercial vehicles and equipment seeking to use ferry services will also increase and this has the potential to exacerbate existing capacity challenges. It was suggested that one solution would be to provide additional freight services, particularly on busy routes.

- Introducing a campervan surcharge.
- Having Car Hire or Car Club options available at either side of ferry crossings, with costs set at road equivalent to incentivise travellers to use these options.

In relation to booking and/or capacity management systems or processes there were references to:

- As at Question 8, formalising the prioritisation of islanders travelling for medical purposes and appointments.
- Advertising the need to book in advance at peak times.
- Reintroducing waiting lists.

Other suggestions related to responses to delays or cancellations and included that there needs to be a published protocol which allows for a next day relief sailing in the event of a service being cancelled for any reason. If all else fails, the use of replacement charter flights should also be a possibility.

‘Pinch Points’ and Options for Additional capacity

As noted above in response to earlier questions, many respondents took the view that additional capacity is required. With specific reference to the proposal on identifying the key pinch points, a private sector respondent expressed a view that, on the NIFS network, these are already well known to the operator and community, but that they saw little serious action being taken by Transport Scotland to alleviate the issues experienced.

There were also queries about what is meant by being ‘practical, beneficial and affordable’ and how this relates to what is delivered to island economies and communities. It was noted, for example, that the priorities of different communities may clash; a query posed was what would happen if an additional Sunday sailing was requested by the Tiree community, but the ferry was being used on another route, thus leaving any request null and void.

A general point made a local authority respondent was that pinch points need to be identified across all ferry services which are fully revenue funded by Scottish Government, not just the CHFS and NIFS networks; it was suggested that an 'Islands Connectivity Plan' needs to consider this aspect of connectivity for all islands.

Some comments identified specific routes which the respondent(s) saw as experiencing pinch points, along with suggestions to address these pinch points. Examples included that:

- Communities in the Western Isles have previously made requests for additional sailings across both the Sounds of Barra and Harris. Specifically suggesting that there should be a two-ferry service on the Sound of Harris.
- Where Colonsay shares a service with Islay, Colonsay travellers report often being unable to utilise the services because Islay travellers are booking the capacity long in advance; it is expected to be relatively straightforward to have allocated spaces for Colonsay users and a standby system for potential ferry users on other islands if, for some reason, the Colonsay allocation is not fully utilised.
- Colonsay's winter timetable is suggested to give the impression that the island is almost unreachable, and many visitors and trades are reported to not risk being stuck for days longer than planned. Extra services could remedy this and build in resilience.
- Islay's need for more services on Fridays; current services are heavily booked well in advance by workers leaving the island at that time.

In addition to looking at current pinch points, respondents also highlighted the importance of looking to the future and, in particular, to economic developments that will require capacity and resilience to be improved. Examples given included: ScotWind; the Western Isles Interconnector; EDF onshore wind farm; the Stornoway Deep Water Port development; further growth of the whisky industry on Islay; a number of major infrastructure schemes in Shetland, including offshore and onshore wind, space, and decommissioning projects; and further growth of Orkney's aquaculture sector.

In terms of existing plans, it was reported that the currently unfunded plan to replace the freighters on the NIFS route would partially reduce the constraints on the NIFS routes, particularly if the conclusion of the business case is that replacement vessels are 'freighter plus' i.e. inclusive of additional passenger capacity. However, it was also argued that, if the solution is limited to freight only, then the benefits will be significantly fewer and passenger demands will not be met.

New opportunities

In addition to comments on existing services, respondents also identified new opportunities, including for:

- Services to open up a market for day-trip visitors to the Western Isles; the local authority respondent highlighting this issue reported that this opportunity could have been exploited already had local advice been heeded.
- The construction of more fixed links. There were references to bridges and tunnels, and there were calls to explore the merits of these alternative options, particularly where current ferry services are not meeting demand. Although relatively few respondents highlighted specific locations, those that did so were most likely to refer to inter-islands fixed links for Shetland. There were also references to links between the mainland and Mull, across the Sounds of Harris and Barra, between Islay and Jura, and to replace the Corran Ferry.

Concerns about the approach

Although the majority of respondents agreed with the proposed approach to addressing capacity issues, some respondents did think Transport Scotland's proposal is either focusing on the wrong issues, or that it, and the system more widely, will simply not be able to deliver.

There were also concerns that the intention behind the proposals does not address the underlying issues. Respondents tended to see these as being either about the way RET has been implemented (see Questions 16 to 19) or simply about the need to increase capacity in the network.

Freight

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

Question 11: In what way do you think the costs of island freight transport could be shared differently between users and public funding?

Around 145 respondents answered Question 11, albeit some noted that this is a difficult issue on which to comment, or raised more general issues relating to freight, including that a suitable and efficient freight ferry service should be the aim. Associated with this were calls for Scottish Government investment in infrastructure and technology, including improving and modernising ports, ferry terminals, roads, and vessels, to enhance efficiency and reduce operational costs for freight services. There were calls for freight only services, including overnight services.

A ferry committee respondent was of the view that reduced commercial vehicle ferry fares would not need to result in increased public funding if some importance was placed on the need to reduce ferry operating costs. However, a private sector respondent questioned the value of looking in isolation at whether the costs of sea freight transport could be shared differently and suggested that a serious and strategic review of how services are provided and supported in Scotland is overdue.

The suggestion that many of the wider benefits of ferry services cannot easily be quantified or monetised was challenged, and it was suggested that there is no reason why a Cost Benefit Analysis cannot be carried out.

Impact of freight costs

There were a number of references to freight charges ultimately translating into a cost to island residents, be that in terms of increased prices when purchasing goods from island businesses or in higher delivery charges when purchasing direct from a mainland supplier. To set this problem in context, a community council respondent stated that the cost of living in islands is already up to 40% higher than on the mainland, and that any increase in the cost of freight is likely to exacerbate this.

In terms of business responses, there were references to the wider operating environment over the past couple of years, recognising the inflationary pressures and other increased costs. Business-related respondents expressed their concern that higher freight charges, along with poor reliability of ferry services, may lead

suppliers to question whether it is viable to supply and deliver to island businesses and communities; the corresponding point was that no private business should be discouraged from providing essential freight services.

It was also noted that freight charges impact on the viability of island-based businesses that are exporting to the mainland or other islands; in the case of Shetland, it was suggested that this would be a particular risk to the seafood, aquaculture and livestock industries where suppliers closer to distribution networks already benefit from a commercial advantage through lower overall freight transport costs. The associated concern was that if island businesses become less competitive, there will be knock on risks to profitability and ultimately to jobs and the local economy.

In relation to particular types of business, a ferry committee respondent commented that the cost of ferry transport is seen to be a major factor for house building, service provision and supplies of raw material to manufacturers and farmers. Again, there was a concern that for those who rely on importing freight, such as the construction and engineering industries, there is a risk that any increased costs could get passed on to end customers.

In terms of particular locations, it was stated that end to end journey freight costs are already relatively high for Shetland, and a small business on the Small Isles reported that providing essential local services has got increasingly hard recently, with the overall import and export costs doubling in the last year, and some Small Isles-based businesses ceasing to trade.

For many respondents, the overriding issue is that any approach should not increase freight costs in a way that undermines local businesses and, by extension, the local economy, or results in even higher prices for island residents; it was suggested that there needs to be a recognition that freight is not a choice for islanders. Given its critical role, it was suggested that the ferry service should not be viewed as a profit-generating enterprise but as warranting a level of public subsidy that ensures the long-term viability of freight.

Framing of any subsidy approach

While there was occasional support for the status quo, most respondents were looking for some form of increased public subsidy for freight; as earlier, this was often connected with ensuring the future of island communities. In terms of how or to whom/what that subsidy should apply, there were references to:

- Bringing essential supplies to and from the islands such as food, livestock and supplies and building materials, but also having a better distinction between essential and non-essential freight.

- The scale of some businesses or operations, for example that any approach should consider the needs of crofters.

Equivalence and RET

The most frequently made point was that RET fares should apply to freight. General comments included that with regard to freight transport, islands should have the same costs as their counterparts on the mainland, and that only when government no longer funds or subsidises rail and road building and services would it be appropriate to remove public subsidy from freight on ferries.

There were also comments about equivalence between different locations and routes, including that equivalent fares and subsidies should apply. However, it was noted that such an approach would need to accommodate a broad range of circumstances; for example, it was stated that freight costs for Knoydart are unusually high due to the need to use a landing craft, and that this has been wholly funded from the private sector until the recent provision of RET funding to Highland Council for the route.

Associated points included that RET fares for freight would bring significant economic and social benefit, including because inflated freight costs are a major driver of the high cost of living on the islands and high supply costs for business, which in turn acts as a brake on business development.

However, it was also suggested that the current approach does not work for all locations and the ferry fare itself is only one part of the cost of freight deliveries. For example, it was stated that the cost of freight to Coll is punitive, despite the application of RET, and that a new system must be found that caps the amount carriers can charge, without forcing them to withdraw their services altogether, or the operator should step in and convey freight on behalf of the community.

Challenges when considering profitability

Some respondents also addressed the consultation's reference to profitable businesses, including by suggesting that some businesses are only profitable because subsidised ferry fares enable them to compete with companies on the mainland. It was also reported that a company needs to be profitable to grow through investment, and again that jeopardising that profitability would be counterproductive.

Although some respondents did consider that public subsidy seems iniquitous when larger, profitable businesses are making considerable use of freight services, the challenges of creating a workable alternative that does not result in unintended consequences were also highlighted. It was suggested that some targeted

conversations with industry may be required, not least because defining a profitable business is complex process and imposes serious risks to the businesses and communities reliant on the service. A private sector business respondent was concerned that any such system would be complex and unworkable. The issue of equitable treatment was also raised again, including that businesses on islands without the possibility of fixed links will be disadvantaged. Given these potential issues, there were calls for any changes to the current commercial arrangements to freight to be considered very carefully.

However, others did see a case for change, with comments including that:

- If a business is inherently reasonably profitable then it should not be receiving a subsidy.
- Some of the companies involved can be multimillion worldwide operations, and that the public should not be subsidising their profits.
- Businesses that make an active choice where they produce can be expected to have made a calculation before deciding for a specific location. Hence, subsidies to transport their products from islands would not be appropriate.

Finally, there was reference to freight associated with projects of national significance, such as windfarms and the wider energy sector, where the end customers are not local communities or businesses; it was suggested that consideration could be given to how the cost of transporting the associated freight could be shared differently but, again, that this would need careful research and consideration to avoid any unintended negative impacts.

Vessels and ports

The Vessels and Ports Plan proposes that, to renew the vessel and port assets required for the long-term sustainability of current ferry networks, prioritising where to invest is required due to budget constraints in the current financial environment. The Plan proposes 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.

**Question 12: Do you agree or disagree that these are the right factors to consider when making decisions on prioritisation?
Please explain your answer.**

Responses to Question 12 by respondent type are set out in Table 13 below.

Table 13: Responses to Question 12 by respondent type

Respondent	Agree	Disagree	Total
Community Council, Development Trust or Transport Forum	7	1	8
Energy related business or group	3	2	5
Ferry Board, Committee or Group	4	1	5
Local Authority, RTP or CPP	6	1	7
Port or harbour authority	2	0	2
Public Body	1	1	2
Third sector or campaign group	2	0	2
Tourism organisation or business	4	0	4
Trade Union	1	0	1
Other private sector business or group	4	0	4
Total organisations	34	6	40
% of organisations	85%	15%	100%
Individuals	98	32	130
% of individuals	75%	25%	100%
All respondents	132	38	170
% of all respondents	78%	22%	100%

A majority of respondents – 78% of those answering the question – agreed that the factors set out are the right ones to consider when making decisions on prioritisation. Organisations were more likely to agree than individuals, at 85% and 75% respectively.

Around 130 respondents made a comment at Question 12.

A number of respondents noted their agreement with the three factors set out, including that they are all important, but that delivery will be key. In terms of the fit between the three priorities and the ICP overall, a joint response from a local authority and regional transport partnership suggested that they align with the Vision and Priorities and that, by considering these factors, decision-makers can ensure that ferry investments are directed towards projects that will have the greatest positive impact on island communities. There was also a note of caution around the difficulty of determining what each of the factors would mean in practice, as well as their potential to lead to unintended consequences for some islands. In relation to prioritisation decisions, it was noted that the community needs assessment findings on each island/route will provide vital evidence, and that decision-making must be

supported by a transparent and consultative process involving stakeholders and communities.

The issue of funding and investment was also raised, with concerns about references to budget constraints; while it was recognised that the current financial environment is challenging, it was also noted that it is not just about national budgets, but about impact on communities, including those for whom ferries are essential services. It was suggested that these services require the necessary financial support, whatever the cost, provided that the services are run efficiently. There was also reference to having an understanding of the counterfactual position in relation to investment; an example given was, if no investment was made and reliability continued to worsen, what impact would this have on the sustainability of a route? It was reported that such an assessment method is common among other transport schemes.

There was also a call for all new vessels procured to deliver the ICP Vessels and Ports Plan to be publicly owned by the Scottish Government and chartered to publicly owned service operators, ideally subsidiaries of David MacBrayne.

Equally, the risk of having to prioritise ferry services in the short term if at the expense of long-term sustainability was highlighted, with planning and investment around vessels and ports described as the most fundamental part of the ICP. In relation to the necessary investment, there were references to the public funds being invested into both the rail service and the road infrastructure and it was suggested that any cut in ferry services and capacity to suit contracting Government budgets is wrong in principle and incompatible with the principles of “island proofing”.

Another wider issue raised was that local authority-controlled routes should also be covered by the ICP, and by extension be considered when making decisions on prioritisation. It was suggested that if local authority ports, harbours and ferry services are not covered by future long-term plans (e.g. the Vessels and Ports Plan) and investment, then there is a risk that some island communities will be excluded from future transport investment programmes that would support national priorities.

Maintaining and increasing reliability and resilience

Comments relating to this factor very much reflected those at earlier questions, and at Question 7 in particular. They included that sustainability is key, not only for the routes but also for the communities served.

Ports and harbours were described as an essential part of the ferry network, and it was suggested that the need to invest in them is the same as the need to invest in

vessels. However, it was also noted that the picture is slightly more complicated due to the number of different port owners. Suggestions as to how port infrastructure could help support a more resilient and reliable ferry service included:

- Ensuring the appropriate investment is made into port infrastructure, including for privately owned ports. There were calls for a defined program of maintenance and improvement, rather than sporadic interventions.
- Giving priority to ports that have not been upgraded recently, including to avoid emergency/critical works being required.
- Port operators being liable for the impact of poor service where the facilities are found to be at fault.

There was also a call for better co-ordination of vessel procurement and port infrastructure improvements. An example given was that, in the case of Islay, the two new vessels may arrive before the planned improvement works to accommodate them at Port Ellen are fully completed. It was also suggested that the policy of building vessels to fit a particular port is fundamentally flawed and that the option of considering and nominating 'new' ports in the future should not be discounted.

In relation to vessels themselves, it was reported that resilience and reliability are increasingly impacted by external factors, most notably changes in weather patterns and that, in some instances, it was argued that larger vessels could be less reliable than smaller ones. More generally, it was suggested that the resilience of vessels and infrastructure must take account of prevailing changes to operating conditions and that changes in sea conditions and wind speeds need to be carefully monitored and used to inform the safe design of new ferries and infrastructure on the CHFS and NIFS networks, particularly given the significant differences between the routes operated on the respective contracts.

An associated point was that the costs associated with large, single vessels, combined with costs of any consequential necessary changes to port infrastructure, can impact on the overall costs of serving island communities. Other vessels related comments and suggestions included that:

- Decisions around the number and design of ferries – in terms of type and size – is a driver service flexibility, operating costs and of the level of investment needed in ports.
- Some communities have ferry services with relatively long journey times and low sailing frequency; this suggests a need for faster and/or more than one vessel operating on these routes to meet users' expectations.
- Vessels should be able to operate on different routes, with a limited number of different models of ferry to support this flexibility.

- Decisions on the design of vessels must be taken in consultation with the relevant Trade Union(s) so that their members have a direct say in their working conditions on these vessels.
- Vessel procurement should be cognisant of changes at international level to mandatory Seafarer Training, Certification and Watchkeeping (STCW) requirements for crew working on ferries powered by new green technologies.
- Financial penalties for the supplier should be built in for if new builds are not completed on time; if the vessels are all publicly funded then their replacements should have solid contracts and contract terms that best suit the taxpayer not the shipbuilder.

There was also a suggestion that there is actually over-provision of ferry services for particular islands which could be used elsewhere, including if provision is insufficient or to facilitate ferry maintenance.

Primary transport connection

Comments often addressed themes covered earlier, including those around essential services and sustaining the local economy; the central role of ferry services and, in many cases, the only viable option being a ferry service was again highlighted.

In terms of making decisions on prioritisation, points raised included that there needs to be a clear understanding on the purpose of the ferry service; it was suggested that at present there appears to be a disconnect between the requirements of providing a service and for whom the service is provided, and that this can lead to the needs of ferry-dependent communities taking second place to prioritising investment and operation. Where there are no alternative transport options, there were calls for investment decisions to consider the impact of works on the community.

It was also seen as essential that any decisions on prioritisation:

- Are understood by the community and have buy-in.
- Use an assessment process which includes a customer service metric reflecting customer experience.
- Take particular account of the needs of young people commuting for education.

As at earlier questions, it was also suggested that the concept of “lifeline” services should be retained, especially in relation to those communities identified as at a greater risk of depopulation and economic decline.

Also as at earlier questions, some respondents pointed to a need to move away from a reliance on ferry services as the primary and sometimes only transport connection

and to consider the potential of more fixed links. Further comments included that, given the likely level of investment, alternatives such as tunnels should be considered; it was suggested that although probably more expensive in the short term, they could offer a more lasting and less expensive solution in the long term and that by expending considerable resources in a short term ferry infrastructure solution Scotland runs the risk of never being able to afford what might be described as a better solution.

Risk of depopulation and economic decline

Respondents were most likely to comment on the need to consider those communities identified as at greater risk of depopulation and economic decline, with points including that poor ferry links contribute to depopulation and, conversely, that it is very important to keep communities connected to avoid depopulation and any economic decline.

When considering depopulation, it was seen as important to consider not only total population but also the demographic structure, such as loss of young people and an ageing population. Good connectivity was seen as vital to supporting population growth, including by retaining young people and attracting those of working age. In relation to particular communities and types of location, comments included that:

- The communities identified as at greater risk of depopulation and economic decline should include mainland communities that provide vital onward connectivity and products and services to the islands.
- Care will be needed to ensure that the areas not currently identified as priorities for investment do not quickly become at risk of depopulation and economic decline themselves.
- The Development Team within the Crofting Commission are working on projects within the crofting counties to specifically address the issues of depopulation and associated issues, as laid out in the National Development Plan for Crofting; it was hoped that the Crofting Commission would be involved in a strategic and meaningful way in the development of new policy to ensure that crofting and crofters are given the appropriate importance within policy planning.

Also in relation to particular communities, a public body respondent commented that young people are the future of Gaelic, and that good ferry services play a significant part in their decisions whether to continue to live on an island.

Other respondents also referred to the importance of considering tourism. For example, while recognising the rationale for prioritisation given budget constraints, another public body respondent was keen that the visitor economy and its role in

sustaining island communities is reflected; they commented that tourism sustains communities, creates jobs and attracts investment and is an economic and social powerhouse benefiting every part of Scotland.

In relation to other types of economic activity and development, it was suggested that enabling businesses to import equipment and supplies, such as those required by large energy projects, is a key driver of economic growth. It was noted that this, in turn, creates high-quality economic opportunities which allow people to continue living and working in island communities.

While most of those commenting on depopulation were looking to see it halted or reversed, there were also a small number of responses which questioned whether this is a sensible or reasonable priority. Comments included that the approach could hold back areas that are currently growing and where the economy is expanding, and that where economic decline and depopulation is already taking place, ferry services will be far from the only issue. It was also suggested that, given the climate emergency, it may not be appropriate to keep subsidising all communities at a level that keeps them viable.

Competing factors or priorities

Albeit sometimes broadly agreeing with the suggested factors, some respondents did put forward additional factors that they considered equally important. Other respondents, primarily those who had disagreed at the closed question, suggested alternatives.

Capacity in the network was the most frequent suggestion, with associated comments including that routes with the greatest capacity constraint should have the greatest priority. Necessary or greater capacity was linked not just to preventing economic decline, but to underpinning economic growth, and there were calls to recognise the needs of those communities where the economy is growing, and where the existing ferry service is becoming a limiting factor in this growth.

Another suggestion was that decisions on priorities must take account of the need for ports and vessels to be accessible for those with mobility issues or disabilities, and there were also references to: safety and compliance; asset condition and performance; operational efficiency; strategic alignment; cost-effectiveness and budget constraints; stakeholder engagement and consultation; and risk management.

Question 13: Currently the factors above are not ranked. Do you think they should be?

Please explain your answer.

Responses to Question 13 by respondent type are set out in Table 14 below.

Table 14: Responses to Question 13 by respondent type

Respondent	Yes	No	Total
Community Council, Development Trust or Transport Forum	3	6	9
Energy related business or group	2	2	4
Ferry Board, Committee or Group	2	3	5
Local Authority, RTP or CPP	3	5	8
Port or harbour authority	0	2	2
Public Body	1	3	4
Third sector or campaign group	1	0	1
Tourism organisation or business	1	3	4
Trade Union	0	1	1
Other private sector business or group	3	1	4
Total organisations	16	26	42
% of organisations	38%	62%	100%
Individuals	52	71	123
% of individuals	42%	58%	100%
All respondents	68	97	165
% of all respondents	41%	59%	100%

A majority of respondents – 59% of those answering the question – did not think that the factors set out should be ranked.

Around 125 respondents made a comment at Question 13

Reasons for not ranking the factors

Those who did not favour ranking the factors were most likely to say that they were all of equal importance, and sometimes also that they are fundamentally linked and need to be considered as a whole. It was suggested that ranking them implies that one aspect should take priority over the others, and that this is not the case.

Other reasons for not agreeing with a ranking approach tended to reflect either a basic disagreement with one or more of the factors identified, or a view that a wider

set of factors needs to be taken into account. There was a concern that, given the range of priorities and factors to be considered around any investment project, it would not be helpful to tie decision-making to ranked priorities.

There were also references to priorities needing to be assessed on a case-by-case basis, reflecting the needs of different communities, with a suggestion that if these factors are ranked, it could result in contentious or perverse outcomes. An alternative suggestion was taking a holistic approach, based on specific detail and scope, using the three factors as a guide to develop each socio-economic case as projects arise.

Other points stemmed from concerns that it is not appropriate to prioritise one community's needs at the expense of another's. It was suggested that ranking the factors risks the creation of a 'league table' and that while there might be instances where priority has to be given to certain community needs, the general concept of ranking should be avoided and each community and situation should be considered separately and on its own merits.

Possible rankings

There was a suggestion that the factors should be further refined and weighted to reflect their relative importance, and that such an approach would help ensure that the most critical factors are given the highest priority in decision-making. In terms of factors that could be considered when refining and weighting the prioritisation factors there was reference to: the specific needs and priorities of each island community; the relative importance of each factor; and the potential impact of each factor on the overall ferry network. In terms of how the factors might be refined and weighted, suggestions included engaging with stakeholders and communities, using a multi-criteria analysis framework and developing a transparent and consultative process.

Most of those who did support a ranking approach went on to suggest a range of possible ranking orders. They were most likely to suggest the order currently set out is the right one; maintaining and increasing reliability and resilience (Factor 1); providing the primary transport connection required for the sustainability of each community (Factor 2); followed by a focus on depopulation and economic decline (Factor 3). There were also references to Factor 1 being the most important. Other variations suggested included:

- Factor 2 is the most important.
- Factor 3 will flow from the other two, or that the other two are more important than Factor 3.
- Alternatively, that Factor 3 is the most important, with a suggestion that depopulation is the ultimate metric, aggregating all others.

As at Question 12, it was also suggested that any ranking order should reflect local priorities, and that the factors should be ranked according to the needs of different areas. There were also calls for any proposed ranking to be put to local communities.

Other respondents did favour a ranking of factors but, again reflecting some of the suggestions made at Question 12, identified factors other than those set out. Suggestions included that the first/most important factor should be:

- Community growth aspirations.
- Reaching net zero and planning for climate change.

Low carbon and environmental impact

A Strategic Environmental Assessment (SEA) will be carried out on the overall ICP to ensure that environmental and sustainability aspects are captured and considered in the development of policies and plans. 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. Actions that can be taken by ferry operators in the shorter term are: reviewing operations to improve fuel efficiency; designing vessels that are more fuel-efficient by optimising hull design and utilising low emission technologies where possible; using electric power supplied from the shore when in port, especially overnight; and exploring use of batteries for small ferries either on their own or alongside normal engines (as a 'hybrid').

Question 14: What environmental issues do you believe should be captured in the Strategic Environmental Assessment in relation to this plan?

Around 140 respondents answered Question 14.

The most frequently raised points were that, while environmental issues may be important, they are not currently a top priority, or that a realistic approach be adopted to ensure that achieving targets on emissions does not come at the expense of ferry service provision. Ferry board, committee or group respondents were among those who argued that any environmental impacts associated with improved ferry services should be weighed against the potential impacts of island communities becoming unsustainable in the absence of reliable services.

Other general comments included that the Strategic Environmental Assessment (SEA) should capture a wide range of environmental issues in relation to ICP policies and proposals, and their reasonable alternatives, and that Scope 3 emissions should be captured to allow planning for their reduction.

Climate change and greenhouse gas emissions

The importance of reducing carbon emissions and moving to renewable energy sources were the most frequently identified issues for inclusion in the SEA. Although most comments focused on impacts in relation to travel by sea, emissions from aviation and construction activities associated with any fixed links were also highlighted. Some respondents noted opportunities to support sustainable travel choices, considered in more detail at Question 15.

A small number of respondents observed that the Scottish Government has recently abandoned its target of a 75% reduction in emissions by 2030 and that new plans and targets will need to be set.

Carbon emissions associated with vessel operation

It was noted that ferry operations contribute to greenhouse gas emissions, which contribute to climate change, and that this applies to both vessels while in operation and in port overnight.

With respect to decarbonisation of vessel operation, there were references to potential for use of renewable energy – both electricity and green hydrogen – as power sources, with scope to use locally-generated energy highlighted. However, issues were also raised with respect to whether ports have sufficient network capacity to facilitate the introduction of electrical vessels and constraints on grid capacity on some islands that could be further exacerbated by ferries using shore-based power. It was argued that if the electricity used to power ferries is generated using fossil fuels, the carbon footprint will be greater than that from continuing to use diesel.

Some respondents commented on proposed use of Liquid Natural Gas (LNG) as a more environmentally friendly alternative to diesel, including the need to consider the impact of methane emissions, and that any reduction in carbon emissions during operation seem likely to be offset by the current necessity for fuel to be transported by road tanker from southern England.

It was also argued that there should be consideration of the environmental impacts associated with the whole life of a ferry, including emissions during construction, operation and decommissioning.

Suggestions with respect to improving operational efficiency to reduce fuel use and hence carbon emissions are covered at Question 15.

Carbon emissions associated with port operations

Port operations were also identified as a potential source of carbon emissions that should be considered, for example in relation to any additional recharging or refuelling infrastructure that may be required, as well as in normal operation.

Carbon emissions associated with the whole journey of service users

A small number of respondents proposed that carbon emissions should be considered in terms of the full journey of passengers, rather than solely the ferry component. With respect to reducing emissions from road traffic, it was argued that active travel and use of public transport should be encouraged, and it was noted that moving freight from roads onto ferries would reduce overall carbon footprint.

Flood risk and coastal erosion

Impacts of climate change such as severe weather, sea-level rise, flooding and coastal erosion on transport infrastructure were highlighted, particularly with respect to the vulnerability of port infrastructure. It was noted that measures to enhance the resilience of ferry terminals and also airports and fixed links will be required.

Air quality

Local authority and regional transport partnership respondents were among those who suggested that the SEA should consider the ICP's impacts on air quality, including with respect to ferry emissions, aviation exhaust and road traffic. In particular, it was noted that emissions from ferries can contribute to air pollution, with potentially negative impacts on both human health and the environment and that such impacts could be mitigated by measures including reducing the idling of engines in harbours use of cleaner fuels, and improved public transportation options.

Water quality

Local authority and regional transport partnership respondents also commented on issues related to water quality, including potential impacts on marine/coastal and freshwater environments. Ferries discharging wastewater, sewage, and other pollutants were cited as causing potential harm to marine ecosystems as were port infrastructure and fixed links with measures to minimise disturbance in sensitive marine environments, protect marine species, and mitigate risks of pollution or habitat destruction required. Ferry operations, port operations and fixed links were also seen as having potential to impact water resources and damage freshwater ecosystems, requiring measures to prevent water pollution, manage stormwater runoff, and protect aquatic habitats from contamination or degradation.

Noise

Impacts of nuisance noise from ferry engines and other port equipment on people who live near ferry terminals and ports were highlighted, as were noise and vibration arising from aviation activities and from road traffic. Measures to mitigate noise pollution could include sound barriers, acoustic insulation, and flight path optimisation.

Biodiversity

It was noted that ferry operations can impact marine biodiversity, both as a result of pollution and also by disturbing marine habitats. Impacts associated with port works should also be assessed – for example if they impact seagrass meadows. Measures to minimise disturbance to sensitive marine environments, protect marine species, and mitigate risks of pollution or habitat destruction should all be identified.

Waste management

Generation and disposal of waste and debris associated with ferry operations, aviation activities, and construction projects were suggested for inclusion in the SEA, requiring measures to promote waste reduction, recycling, and support for the circular economy as well as pollution prevention. Specific suggestions with respect to onboard catering included assessment of single use plastics and reduction of packaging.

Landscape and cultural heritage impacts

New infrastructure developments should also be assessed in terms of potential impacts on land use patterns and on natural landscapes, with consideration of measures to minimise visual impacts and preserve scenic vistas. Consideration should also be given to potential effects on cultural heritage and the historic environment.

Cumulative impacts

Potential cumulative impacts were highlighted – both the impacts of current and future ferry operations in a given area, and the broader cumulative effects of multiple projects and activities on the environment. How individual projects interact with each other and with other developments should be assessed to understand their combined environmental impact.

Other suggestions

Other subjects that respondents suggested should be captured in the SEA included:

- Impacts of increased connectivity on tourism.
- The needs of disabled people, to avoid inadvertently disadvantaging disabled people who rely on private car travel.

Question 15: Do you have any other suggestions in how ferry services can contribute to the reduction of carbon emissions?

Around 115 respondents answered Question 15, with a small number stating that they had no suggestions, or felt existing actions are sufficient.

A public body respondent suggested that how providers calculate and report their carbon emissions could be considered, as transparency will help to inform consumer behaviour and drive providers to act in meeting consumer demand. Imposing emissions standards could also provide incentives for ferry operators to adopt cleaner technologies and practices.

Improved operational efficiency

A local authority respondent commented on the consultation paper's reference to reviewing operations to improve fuel efficiency, noting that optimising vessel speed was one of the measures operators could take to minimise fuel consumption and reduce emissions, and that both NorthLink and CalMac ferries could make significant fuel savings by running more slowly. However, other local authority respondents emphasised that reducing vessel speed to cut emissions would not be welcomed by ferry users who generally seek as fast a journey as possible, or that efforts to reduce emissions should not impact either the reliability of services, or the timetable for introduction of replacement vessels.

Other respondents suggested that replacing an ageing fleet with newer vessels that use cleaner fuels or are more energy efficient by design would deliver reduced carbon emissions. However, it was also argued that, since a reliable service is critical to island communities, there should be an initial focus on proven technologies.

Further suggestions in terms of improving operational efficiency included:

- Making best use of fuel by optimising available capacity including by use of flexible fare structures, and improved planning of timetables to minimise empty runs.

- Reviewing suitability of vessels for routes, so that new vessels are not over-specified.
- Where possible, basing vessel crews on shore, providing scope to reduce both vessel carbon emissions and the size of vessel needed.
- Completion of various port infrastructure projects, for example at Ardrossan Harbour.
- Operating services over the shortest possible route – for example Ardrossan to Brodick rather than Troon to Brodick. It was argued that transporting a vehicle on a sea-going vehicle ferry produces several times more CO₂ than a vehicle travelling under its own power by road, so reducing the length of a ferry passage reduces CO₂ emissions.

Offsetting carbon emissions was also suggested – for example by supporting community tree planting initiatives, thereby also contributing to Scottish Government tree planting targets.

Cleaner fuels

In terms of cleaner fuels, the most frequent reference was to electric or battery power for vessels with some respondents adding that this would be suitable for smaller vessels or for shorter routes. Provision of additional, back-up generators was also proposed and that, while these would need to run on diesel at present, they should have the capacity to use e-fuels in the future. It was also suggested that there should be investment in shore power infrastructure to allow vessels to plug in and use electricity while berthed, and that port power supplies, including for terminal buildings should come from renewable sources.

Investment in local energy generation was suggested and also that a ferry operator could accelerate plans for renewable energy across islands by being a customer, or that there could be potential for co-location of renewable energy generation and ferry services. With respect to how electricity could be generated, there were references to wind, wave and tidal power.

In terms of other potential fuels, hydrogen and hydrogen fuel cells were the most frequently referenced, although LNG, biofuels and hybrid systems were also mentioned. It was noted that Orkney Ferries' MV Shapinsay has already been retrofitted to allow injection of small quantities of hydrogen into the marine diesel on which it runs, but that existing regulations do not allow hydrogen to be used during operation as a passenger vessel.

Vessel design and size

Suggestions in relation to vessel design included that more efficient engines, lighter materials, alternative hull designs (including catamarans and e-foilers as technology develops) and, potentially, wind power devices such as rotor sails and other modern sail power could reduce carbon emissions. Maintenance requirements for components could also be considered.

With respect to size, it was argued both that there could be larger vessels that need to make fewer crossings and smaller vessels operating more frequent services. A local authority respondent suggested that smaller, electric vessels could open up accessibility in coastal communities and provide opportunities for regional boat builders.

It was also noted that the Scottish Government's target of 30% of the ferry fleet being low emission by 2032 does not take account of vessel size and will not equate to a proportionate reduction in emissions across the fleet if achieved entirely by replacing small vessels.

Freight

With respect to carbon emissions associated with freight, it was suggested that there are opportunities to reduce road haulage miles by transferring road freight to sea – for example by providing direct sea-freight services between islands and mainland ports that are closer to large population/business centres, such as Islay to Troon. It was argued that transferring more road freight to sea could not only reduce the carbon footprint, but also bring added revenue and reduce subsidy levels.

A small number of respondents cited knock-on benefits of improved freight transport or lower transport costs in overall reduction in carbon emissions – for example, the ability of renewables developers to transport their equipment to island communities or transport of building materials to islands to support the transition to more energy efficient housing and heating.

Electric vehicles

Respondents raised a number of actions that should be taken in relation to EVs including:

- Addressing concerns around the risk of EV fires on car decks.
- Providing EV charging points on board vessels and expanding charging facilities at terminals.
- Reducing fares for EVs.

Encouraging use of public transport and active travel

Better connectivity with other forms of public transport so that ferry passengers may choose not to travel with their own cars was the most frequent suggestion at Question 15, although it was also noted that effective, accessible public and active travel options on either side of the ferry journey would be required. The impact of low RET fares was also highlighted, with one Ferry Board, committee or group respondent reporting that, for Cumbrae, a combination of low RET fares and lack of mainland parking encourages too many visitors to bring their cars onto the island. RET fares are covered in detail at Question 16.

Respondents suggested:

- Incentives to encourage use of public transport without discouraging visitors to islands that rely on tourism.
- Improved active travel infrastructure on islands, including ferry terminal cycling infrastructure.
- Developing a regional/national MaaS system that co-ordinates all forms of transport.
- Scope for integrated ticketing.
- A discounted ticket for a combined public transport and ferry travel to incentivise sustainable travel journeys and seasonal or discounted tickets for foot passengers.
- Easier booking for bicycles, including priority over cars.
- Potential for passenger ferries in some locations.

Building fixed links

Finally, a number of respondents referenced fixed links, suggesting that these could or should replace ferry services and so reduce emissions in the longer term.

Ferry fares

The RET system of fares is in place across the 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.

Introducing different levels of fares such as ‘islander fares’ on CHFS 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.

Question 16: Do you agree or disagree with retaining the current RET principles set out above, as the basis of a ferry fares structure?

Please explain your answer.

Responses to Question 16 by respondent type are set out in Table 16 below.

Table 16: Responses to Question 16 by respondent type

Respondent	Agree	Disagree	Total
Community Council, Development Trust or Transport Forum	6	3	9
Energy related business or group	2	0	2
Ferry Board, Committee or Group	1	4	5
Local Authority, RTP or CPP	3	4	7
Port or harbour authority	1	0	1
Public Body	3	0	3
Third sector or campaign group	1	1	2
Tourism organisation or business	3	1	4
Trade Union	1	0	1
Other private sector business or group	2	1	3
Total organisations	23	14	37
% of organisations	62%	38%	100%
Individuals	83	41	124
% of individuals	67%	33%	100%
All respondents	106	55	161
% of all respondents	66%	34%	100%

A majority of respondents – 66% of those answering the question – agreed with retaining the current RET principles set out as the basis of a ferry fares structure.

Around 125 respondents made a comment at Question 16. It should be noted that some respondents who disagreed at the closed question went on to reference the potential to introduce different levels of fares, for example calling for RET fares to be available only for island residents. The analysis at this question focuses on the RET principles set out in the consultation paper: points on creation of different levels of fares for different types of user or using fares to tackle congestion are considered in the analysis at Questions 17 and 19.

Overall views on RET

The most frequently made comment at this question – largely by respondents who agreed at the closed question, but also some who disagreed – was that RET fares should be retained. The importance of affordable fares for island residents was often highlighted, with reasons that low fares are so important including low incomes and limited opportunities to increase earnings on islands and centralisation of services

that require travel to the mainland. Some respondents suggested that fares for island residents could be reduced further.

Problems seen as arising from RET fares were also referenced – with cheaper fares creating higher demand for transport of private vehicles. Issues resulting from increased demand included capacity constraints on some routes leading to a poorer service for residents who need to travel at short notice, and delays to island supply chains as well as potential loss of business for island shops if it is cheaper for residents to go to the mainland to shop. Busier roads on islands were also reported, with one consequence being pressure on local authority budgets for road maintenance and parking infrastructure.

However, a small number of respondents cited the ‘Evaluation of Road Equivalent Tariff on the Clyde and Hebridean Network’ carried out for Transport Scotland as having found that RET fares had increased visitor spending and extended the tourist season on most islands, and argued that any negative impacts of RET fares are not the result of the policy *per se* but of the failure to renew the ferry fleet to respond to increased demand. A Tourism organisation or business respondent suggested that the economic benefit of RET to island economies cannot be underestimated. The ‘Evaluation of Road Equivalent Tariff on the Clyde and Hebridean Network’ can be found at <https://www.transport.gov.scot/publication/evaluation-of-road-equivalent-tariff-on-the-clyde-and-hebridean-network/>

Three local authority respondents argued that, as pressures will vary between routes, there should be a flexible approach to fares, rather than any one-size-fits-all solution.

The current RET principles

In terms of the three current principles, there was broad support from some respondents, albeit in some cases also with suggestions for additions or modifications to the scheme as currently operated. There were also general comments that fares for islanders should not increase as a result of any changes made and that any potential changes should be considered carefully and subject to wide consultation to ensure they do not have negative impacts on island communities.

A very few respondents objected to RET fares in principle, because they encourage travel with private vehicles.

Simplicity and transparency

Few respondents commented specifically on the principle regarding simplicity and transparency although it was suggested that initiatives to standardise and simplify

fare structures would be welcome, and that opportunities to make the pricing formula more transparent could help to ensure that island communities are treated fairly.

Comparability and consistency

With respect to comparability and consistency, there were views that RET fares should be applied to all routes, notably with respect to the Northern Isles where both residents and visitors currently face higher travel costs. A private sector business or group respondent expressed concern that there is nothing in the Strategic Assessment Paper referencing extension of RET to the Northern Isles, while a local authority respondent argued that the current application of RET fares only to west coast routes is divisive.

Comments specific to Orkney included that the Scottish Government should continue relevant discussions with the UK Government under the Subsidy Control Act 2022 and that, if RET is not extended, residents should be provided with alternatives such as vouchers. It was suggested that there is a risk that, rather than making a long ferry crossing from Aberdeen, passengers could be encouraged to drive to Scrabster to use the shorter crossing, undermining targets for reduction of road miles.

Event participants' experiences

At an event in Stromness, there was a report that Northlink fares are much higher than similar length of trips on CalMac – for example that the Scrabster - Stromness fare for a family of four more than twice that for Uig - Lochmaddy or Tarbert.

With respect to Shetland, a joint local authority and regional transport partnership response referenced a modified RET structure that is in place but argued that, because of the very long distances involved, travellers to Shetland still face the highest fares in Scotland and a requirement for onboard overnight accommodation that is not helped by RET principles. Reviewing and updating the RET formula to reflect the specific circumstances of the Shetland Islands was requested.

Other suggestions for extension of RET fares included that they should be applied to:

- Council-run ferries.
- Ferries to Dunoon and Kilcreggan and more broadly to peninsula access, in view of the lifeline nature of ferry services to these areas.

Support from the Ferries Special Grant for introduction of a form of RET to reduce fares on the Knoydart route was noted as a good example of Government/ Council/ community co-operation that might provide a model to apply elsewhere.

A small number of respondents highlighted specific routes where RET fares do apply but where current RET pricing is felt to have delivered fewer benefits for residents than elsewhere, including on routes to Coll, Colonsay and Jura. There was also a view that, in some places, RET fares have provided only minimal reductions for residents when compared to the books of discounted tickets or discounted season tickets that have been discontinued.

Public sector affordability versus community sustainability

Most respondents who commented on the third principle emphasised the importance of community sustainability or argued that affordability for residents – and hence community sustainability – should be of greater importance than public sector affordability. It was also suggested that CalMac’s operating costs should be reduced before any increases to RET fares are considered.

Extending RET fares to freight traffic

There were calls to extend RET fares to freight and other commercial traffic since hauliers pass higher fare costs on to islanders adding to the cost of living. For example it was reported that freight costs to Colonsay are such that it is cheaper to take a vehicle to the mainland every few weeks to collect goods than to have them shipped by a third party carrier, and that freight costs greatly add to the cost of development on the island. One respondent commented on the current situation whereby commercial vehicles are not eligible for RET fares, but visitors’ motorhomes of comparable size are.

Question 17: 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?

Please explain your answer.

Responses to Question 17 by respondent type are set out in Table 17 below.

Table 17: Responses to Question 17 by respondent type

Respondent	Agree	Disagree	Total
Community Council, Development Trust or Transport Forum	7	0	7
Energy related business or group	3	1	4
Ferry Board, Committee or Group	0	5	5
Local Authority, RTP or CPP	3	3	6
Port or harbour authority	1	0	1
Public Body	2	0	2
Third sector or campaign group	2	1	3
Tourism organisation or business	1	3	4
Trade Union	0	1	1
Other private sector business or group	2	1	3
Total organisations	21	15	36
% of organisations	58%	42%	100%
Individuals	101	27	128
% of individuals	79%	21%	100%
All respondents	122	42	164
% of all respondents	74%	26%	100%

A majority of respondents – 74% of those answering the question – agreed with the option to create different levels of fares for different types of users, such as island and non-island residents. Individuals were more likely to agree than organisations, at 79% and 58% respectively.

Around 125 respondents made a comment at Question 17, although the analysis below also covers some points raised at Question 16. One general point was a request for clarification whether the proposed ‘Islander Fare’ would be discounted from the existing RET fare or whether the existing RET fare would be retained for islanders while other categories of traveller are charged more? It was also argued that introduction of different levels of fares for different types of users would require significant consultation before developing proposals or implementation. Agreement on the conditions, operation and management of the system would have to be agreed with all stakeholders and be consistent across the ferry services.

Benefits associated with Islander fares

Among respondents who supported different levels of fares for different types of user, the most frequent comments related to the possibility of an island resident fare, with reasons for supporting this option including the low wages and high cost of living on islands, and the lifeline nature of the service for local residents who have no choice but to use ferries, often making multiple journeys throughout the year. It was also seen as supporting Scottish Government policy to encourage people to live and work on the islands and a joint local authority and transport partnership response suggested that a flat rate fare for island residents – regardless of the location or length of the crossing – should be considered.

In contrast it was argued that using the ferry service is a choice for visitors who will generally make only one return journey and can probably afford to pay more. However, there were suggestions that fares for visitors must remain affordable to ensure the tourism economy is not damaged.

As well as a financial benefit to islanders, it was suggested that different fare types could make it easier to review capacity and demand data for different user groups.

Eligibility

With respect to who should be entitled to islander fares, small numbers of respondents in each case suggested:

- Permanent residents.
- Local businesses and local couriers.
- All island freight.
- All foot passengers.
- Visitor EV or hybrid vehicles, for an initial period.

Problems associated with differential fares

Among respondents who did not support different levels of fares for different types of user, the most frequent comments were that such an approach would:

- Be unfair or divisive, and that public transport should be equally accessible for everyone.
- Be difficult to define, complicated to enforce or open to abuse.
- Risk deterring visitors and causing harm to the local economy, including a risk of increased costs for services and deliveries.

Approximately equal numbers of respondents made each of these points.

It was also argued that, rather than looking to modify fare structures to reduce demand, there should be greater work to address lack of capacity.

Definitions

Determining who should be eligible for islander fares was seen as problematic. It was noted that some visitors will have strong island connections – for example coming home to see family who are island residents, or being second homeowners who are from the island and retain the family home while working on the mainland. There was concern that it will be difficult to define eligibility without being discriminatory.

Value of tourism and business travel to island economies

With respect to the potential for increased fares for non-island residents, the importance of tourism to island economies was noted, with references to negative impacts on the sector arising from the Covid pandemic, rising energy prices, difficulties in recruiting staff, disruption to ferry services and the prospect of a Visitor Levy being charged in the near future. Illustrating the impacts of such pressures, a public body respondent reported that their latest Business Panel Survey had found that 51% of tourism businesses have seen their profits margins decrease, while 46% indicated that ‘surviving current financial challenges’ was their top priority in the short term.

Positive impacts that RET fares have been found to have on business travel, business-to-business interaction, business formation and competition were also noted and it was argued that any steps which would add to cost pressures on island businesses should be avoided.

Potential alternative approaches

Some respondents highlighted potential alternatives to different fares for different types of user, with a frequent user scheme the most frequent suggestion, either as a season ticket or books of discounted tickets. It was noted that this could benefit both residents and tradespeople making regular journeys and could avoid any discrimination based on where someone lives.

Other suggestions included applying a surcharge to non-resident motorhomes during peak periods, and that different solutions may be appropriate for different routes.

It was also suggested that further research is needed to understand the impacts of potential fare increases for non-islanders and that this could include revisiting the findings of previous RET evaluations as well as additional data gathering and fare

modelling exercises. More detailed information on the split between islanders and visitors using each route, and a breakdown of various categories of vehicles including LGVs and motorhomes could help to improve understanding of the extent of current capacity constraints.

Under 22s

The draft ICP suggests that foot passenger travel should become free for residents who are under 22 within the Outer Hebrides, Orkney, and Shetland Island groups. There was support for this position but also calls for such a concession to be extended to cover travel between all islands and the mainland and for ferries to provide the same access to free travel for those aged under 22 as is currently available on bus services.

A local authority respondent calling for parity with bus travel noted that, for residents of islands and peninsulas, ferries are effectively bus routes, and that benefits of equivalence with bus travel would be particularly significant where the ferry provides the link to the local town, as is the case for islands such as Raasay and the Small Isles and for Knoydart.

Event participants' views

Young islanders attending an event in Stromness suggested that, as the Young Scot card covers people up to 25, ferry concessions should also be up to 25 rather than 22.

From an economic perspective, it was suggested that free U22 ferry travel would encourage more young people to stay and work in island communities, potentially in the tourism and hospitality sector. It could also allow islanders studying at mainland colleges and universities to return to the islands to work at weekends. Making it easier for young people from the islands to make more visits home could also help to maintain their island connection, such that they are more likely to return to live and work there after finishing their studies.

There was a further request for free U22 air travel when the air service is part of the lifeline service to an island's nearest local centre – for example within the Orkney Islands.

Question 18: Which of these groups do you believe should be eligible for islander fares?

Responses to Question 18 for all respondents are set out in the chart below, with a full breakdown by respondent type in Annex 2.

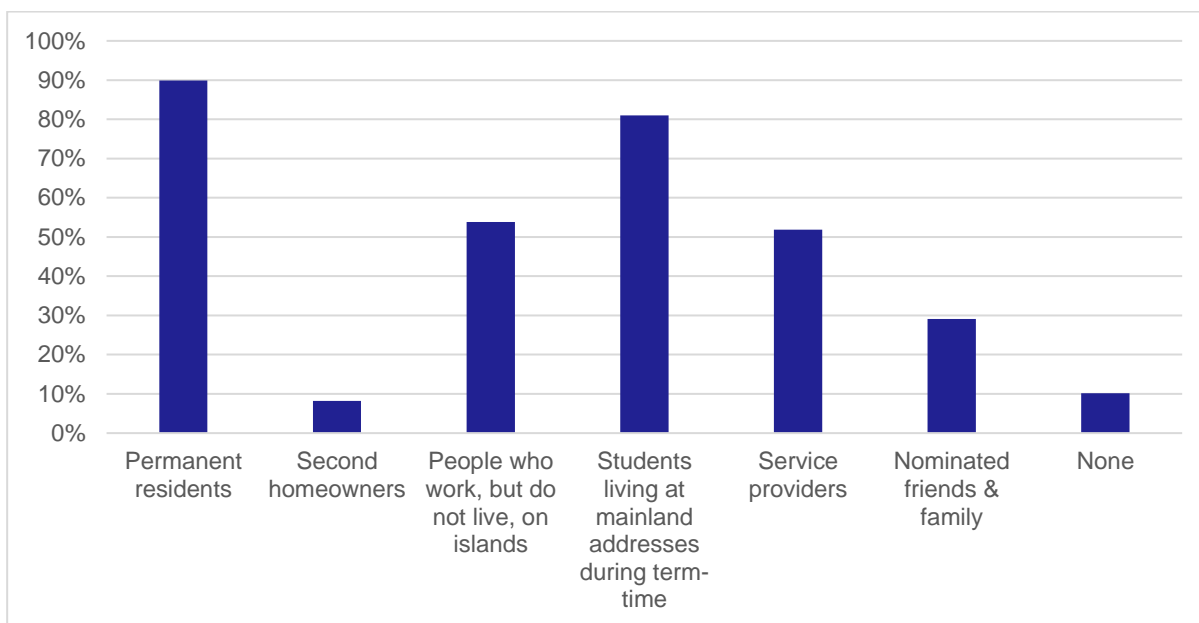


Figure 1 - showing who respondents feel should be eligible for islander fares.

Respondents were free to choose as many options as they wished at Question 18, so percentages are given in relation to the number of respondents who chose at least one of the seven options given.

Overall, 90% of respondents chose ‘Permanent residents’ (almost all of those who made a choice other than ‘None’), with 81% supporting eligibility for ‘Island residents who are currently students and living at mainland addresses during term-time’. There were lower levels of support for ‘People who work but do not live on islands’ and ‘Service providers’ at 54% and 52% respectively, followed by 29% support for ‘nominated friends and family’ and only 8% in favour of islander fares being available to second homeowners.

All those respondents who selected ‘None’ at Question 18 had disagreed with the concept of different levels of fares set out at Question 17. A small number of others who disagreed at Question 17, selected all the possible options at Question 18.

Question 19: 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?

Please explain your answer.

Responses to Question 19 by respondent type are set out in Table 18 below.

Table 18: Responses to Question 19 by respondent type

Respondent	Agree	Disagree	Total
Community Council, Development Trust or Transport Forum	4	3	7
Energy related business or group	3	0	3
Ferry Board, Committee or Group	0	5	5
Local Authority, RTP or CPP	6	2	8
Port or harbour authority	0	1	1
Public Body	1	1	2
Third sector or campaign group	2	1	3
Tourism organisation or business	3	1	4
Trade Union	0	0	0
Other private sector business or group	1	2	3
Total organisations	20	16	36
% of organisations	56%	44%	100%
Individuals	78	52	130
% of individuals	60%	40%	100%
All respondents	98	68	166
% of all respondents	59%	41%	100%

A majority of respondents – 59% of those answering the question – agreed with a fares structure that both encourages passengers to travel without a private vehicle and incentivises travel at quieter periods.

Around 115 respondents made a comment at Question 19.

Among the general points made, a small number of respondents commented on a lack of detail on proposed fare structures or their potential impacts within the Strategic Approach document, adding that they would require further details on what is proposed before coming to a clear view. Others expressed broad support or noted that measures to manage and spread demand are common to fare structures used in other modes of transport. In contrast, a small number of predominantly Individual respondents saw such measures as interfering with the right to choose how to organise their lives or as demonstrating a lack of understanding of life in island communities. Rather than seeking to manage demand, there were again calls to invest in greater capacity. It was also suggested that:

- The proposed fare structures should only apply for non-residents.

- Any increase in fares on lifeline ferry services must not have adverse impacts on what are already fragile island and peninsula economies.
- Care must be taken to avoid cost increases for disabled people who may use a car as a mobility aid.
- Any revised fare structure would require engagement with communities and stakeholders to ensure a 'fit for purpose' approach is adopted.

Although the question covers both travel without a private vehicle and travel at quieter periods, more respondents addressed travel without a private vehicle than commented on travel at quieter periods.

Encouraging travel without a private vehicle

Although there was support in principle for encouraging travel without a private vehicle, the most frequent comments at Question 19 concerned availability of public transport or connectivity between ferry services and other modes of transport. For some the absence of adequate public transport in rural areas or lack of integration between different forms of public transport were seen as making travel without private cars impractical for most people, and as a reason for disagreeing with the proposed fares structure. The extent to which island residents depend on private cars was emphasised, including because of the need to transport children, pets, luggage, medical or mobility equipment, or transporting the supplies that necessitated the trip to the mainland. Tourists and other visitors were also thought likely to be dependent on a vehicle, again because of limited public transport options and their need to travel with luggage.

Other respondents, taking a more positive view, argued that better availability, reliability and connectivity of public transport options will be essential if passengers are to be encouraged to travel without their own vehicles. For example, poor weekend bus services to the Scrabster Ferry were highlighted as a reason that passengers might currently be reluctant to travel without their cars.

An RTP respondent argued that a number of complementary measures will be required to incentivise travel without a private car, for example by freezing or reducing passenger fares, potentially in combination with increases for cars and drivers. There was also a view that many people would be willing to travel without a car if the alternatives can be made both cost effective and more convenient. Specific suggestions included:

- Passenger-only ferries offering lower cost travel.
- Integrated ticketing with other public transport, such as 'rail & sail'.

- Improving support services for travellers without their own vehicles for example an onboard 'left luggage' facility, carrying bags on and off the vessel or a port to destination luggage / bulky goods carrier service.
- Making the operator responsible for providing onward travel for foot passengers if there are delays.
- Better assistance with boarding for disabled passengers, particularly when the linkspan is out of use.
- Developing a regional/national MaaS system that co-ordinates all forms of transport.
- Investment in improved parking facilities at ports and connecting train stations. A port or harbour authority respondent noted that vehicles left by foot passengers for Knoydart and the Small Isles can leave limited parking for day visitors.

With respect to encouraging people to choose active travel options, a Local Authority respondent expressed a view that this would require infrastructure investment designed to suit local circumstances and available budgets. They also noted that pressures on their own budgets mean such projects are likely to require grant funding, but that conditions set by third party funders can make delivery difficult. It was also argued that there must be consideration for older people, disabled people and families with young children who may not find active travel possible.

Incentivising travel at quieter periods

Points in support of incentivising travel at quieter periods included that variable pricing is an appropriate or sensible way to try to encourage better use of quieter services, that this is a fare structure used by other transport operators including train companies and airlines, and that capacity constraints impose other costs on island communities. However, there was also an argument that encouraging travel at quieter times should not be achieved by increasing fares on busier sailings as this would add to living costs for those who have no choice about when to travel and that variable fares risk a situation where better-off travellers are less financially impacted by any peak fare increase.

Quieter times of day

Individual respondents were among those who observed that, some routes have a very limited timetable with too few services for it to be possible to identify quieter times. It was also suggested that it would be unfair to penalise those who need to travel at a particular time – for example for work – or who need to complete a return journey in a single day.

A joint response from a local authority and regional transport partnership suggested that there may be scope to increase current fares for non-islanders during the summer timetable but recommended that application of a peak tariff should not apply:

- On routes where there are only one or two return sailings per day, because of the lack of reasonably close substitute sailings for users to switch to.
- To more than one return crossing each day on routes where there are fewer than five daily return services.

Quieter times of week or year

There was support for using lower fares to incentivise travel at quieter times including because it could help accommodation providers to manage demand and extend the visitor season. One suggestion was that, while visitors might pay more for some summer services, islanders and non-islanders should pay the same fare during the winter timetable.

Some respondents argued that lower fares during the winter months should not be offset by higher fares during peak periods, both because this is inappropriate on an essential service and that islanders who are tied to school holidays will need to travel during periods of highest demand. There was a call for existing peak fares on services to the Northern Isles to be removed.

Annex 1: Organisations responding to the consultation

Community Council, Development Trust or Transport Forum (n=10)

Ardgour Community Council

Coll Community Council

Colonsay Community Council

Harris Transport Forum

Scottish Islands Federation

South Knoydart Community Council

South Ronaldsay and Burray Community Council (representing the two linked island communities)

The Arran Development Trust

Tiree Community Council and Tiree Transport Forum

Scottish Rural and Islands Transport Community

Energy-related business or group (n=5)

Enercon Services UK Ltd

Eurowind Energy Ltd/Uisenis Power Ltd

Lewis Wind Power

Northland Power

Orkney Renewable Energy Forum

Ferry Board, Committee, or Group (n=6)

Arran Ferry Committee

Bute Ferry Committee

Cumbræ Ferry Committee

Cumbræ Ferry Users Group

Ferries Community Board

Mull and Iona Ferry Committee

Local Authority, RTP, or CPP (n=10)

Argyll and Bute Council

Comhairle nan Eilean Siar

HITRANS

Nestrans (North East of Scotland Regional Transport Partnership)

North Ayrshire Council

Orkney Islands Council

SPT (Strathclyde Partnership for Transport)

The Highland Council

The Orkney Partnership, our community planning partnership

ZetTrans – Shetland Regional Transport Partnership & Shetland Islands Council (SIC)

Other Private sector or business group (n=6)

Caithness Chamber of Commerce and Caithness Transport Forum

Coastal Workboats Scotland, Ltd

Pederson Consulting

Scottish Whisky Association

South Uist Business Impact Group

Stewart Group/Seafood Shetland, Lerwick, Shetland

Port or Harbour Authority (n=2)

Mallaig Harbour Authority

Stornoway Port Authority

Public Body (n=6)

Bòrd na Gàidhlig

Crofting Commission

Highlands and Islands Enterprise Submission

Historic Environment Scotland

Mobility and Access Committee Scotland (MACS)

Visit Scotland

Third sector or campaign group (n=5)

Lismore community Transport

Paths for All

The National Trust for Scotland

The Scottish Women's Convention

Unst, Yell and Whalsay Tunnel Action Groups

Tourism organisation or business (n=4)

Auchrannie Resort

Outer Hebrides Tourism

The Scottish Tourism Alliance (STA)

Visit Arran

Trade Union (n=2)

NFU Scotland

RMT

Annex 2: Full analysis for Question 18 (Island fares)

Question 18: Which of these groups do you believe should be eligible for islander fares?

Respondent	Permanent residents	Second homeowners	People who work, but do not live, on islands	Island students living at mainland addresses during term-time	Service providers	Nominated friends & family	None
Community Council, Development Trust or Transport Forum	7	Not applicable	3	7	3	2	Not applicable
Energy related business or group	4	Not applicable	3	3	2	1	Not applicable
Ferry Board, Committee or Group	1	1	1	1	1		2
Local Authority, RTP or CPP	4	Not applicable	2	4	1	1	1
Port or harbour authority	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Public Body	1	Not applicable	1	1	1	1	Not applicable
Third sector or campaign group	2	Not applicable	1	2	1	Not applicable	Not applicable
Tourism organisation or business	1	1	1	1	1		2
Trade Union	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Other private sector business or group	2	Not applicable	Not applicable	1	Not applicable	Not applicable	Not applicable
Total organisations	22	2	12	19	10	5	5
% of organisations	79%	7%	43%	68%	36%	18%	18%

Respondent	Permanent residents	Second homeowners	People who work, but do not live, on islands	Island students living at mainland addresses during term-time	Service providers	Nominated friends & family	None
Individuals	120	11	73	108	72	41	11
% of individuals	92%	8%	56%	83%	55%	32%	8%
All respondents	142	13	85	128	82	46	16
% of all respondents	90%	8%	54%	81%	52%	29%	10%



**TRANSPORT
SCOTLAND**

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