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SEA Post Adoption Statement

Islands Connectivity Plan – Strategic Environmental Assessment

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This Environmental Report has been prepared by [Ramboll UK Limited \(Ramboll\)](#) on behalf of Transport Scotland.

Introduction

Background

The Islands Connectivity Plan (ICP) replaces the Ferries Plan 2013-2022 and sets 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 comprises the Strategic Approach Paper (SAP), Vessels and Ports Plan (VPP), refreshed Community Needs Assessment (CNAs) and the Monitoring and Evaluation Plan. Statutory and public consultation have been key in the development of the ICP and comprised the following:

- Public consultations and engagements were undertaken on a number of relevant plans and strategies (including the National Transport Strategy 2 ([NTS](#)), [National Islands Plan \(NIP\)](#), [Strategic Transport Projects Review 2 \(STPR2\)](#), [Project Neptune](#), etc) and Parliamentary Committee reports (Rural Economy and Connectivity Committee, Public Audit Committee, Net Zero, Energy and Transport Committee), as well as extensive stakeholder engagement carried out by Transport Scotland Ferries Directorate, all of which were used to inform the development of an internal draft SAP.
- A pre-consultation draft of the VPP was shared with key stakeholders and published on Transport Scotland's website in December 2022. Feedback received was used to inform the consultation draft of the updated VPP.
- Consultation drafts of the SAP and VPP were subject to public consultation, supported by community engagement, between February and May 2024. Feedback received was used to inform post-consultation drafts dated December 2024 (internal versions), subsequently subject to Strategic Environmental Assessment (SEA).

The post-consultation draft SAP (December 2024) comprised a long-term Vision, underpinned by four Priorities including: 'Reliable and Resilient', 'Accessible', 'Integrated' and 'Low Carbon and Environmental Impact'. Additionally, three associated Outcomes sat below each Priority, and around 60 theme-based high-level commitments were defined to support the realisation of desired Outcomes.

The post-consultation draft VPP (December 2024) comprised eight Objectives, based on the Vision and Priorities set out in the SAP, along with seven associated Outputs. It also recommended a number of projects that fell under two broad categories: fleet renewal and port upgrades.

Consultation on the SEA Environmental Report ran from 14 February to 13 March 2025. Following consultation and considering views received at that time, the ICP has now been adopted, and the final SAP and VPP have been published on the Transport Scotland website. This SEA Post Adoption Statement has been prepared considering the SAP and VPP versions dated April 2025.

SEA Requirements and Process

Under the [Environmental Assessment \(Scotland\) Act 2005](#) (the 'Environmental Assessment Act'), which transposes the European Union (EU) [SEA Directive](#), Scottish public bodies preparing plans are required to undertake a SEA if such plans, if implemented, are considered likely to have significant effects, either positive or negative.

Figure 1 - SEA process followed in relation to the ICP development illustrates the steps followed, further described below.

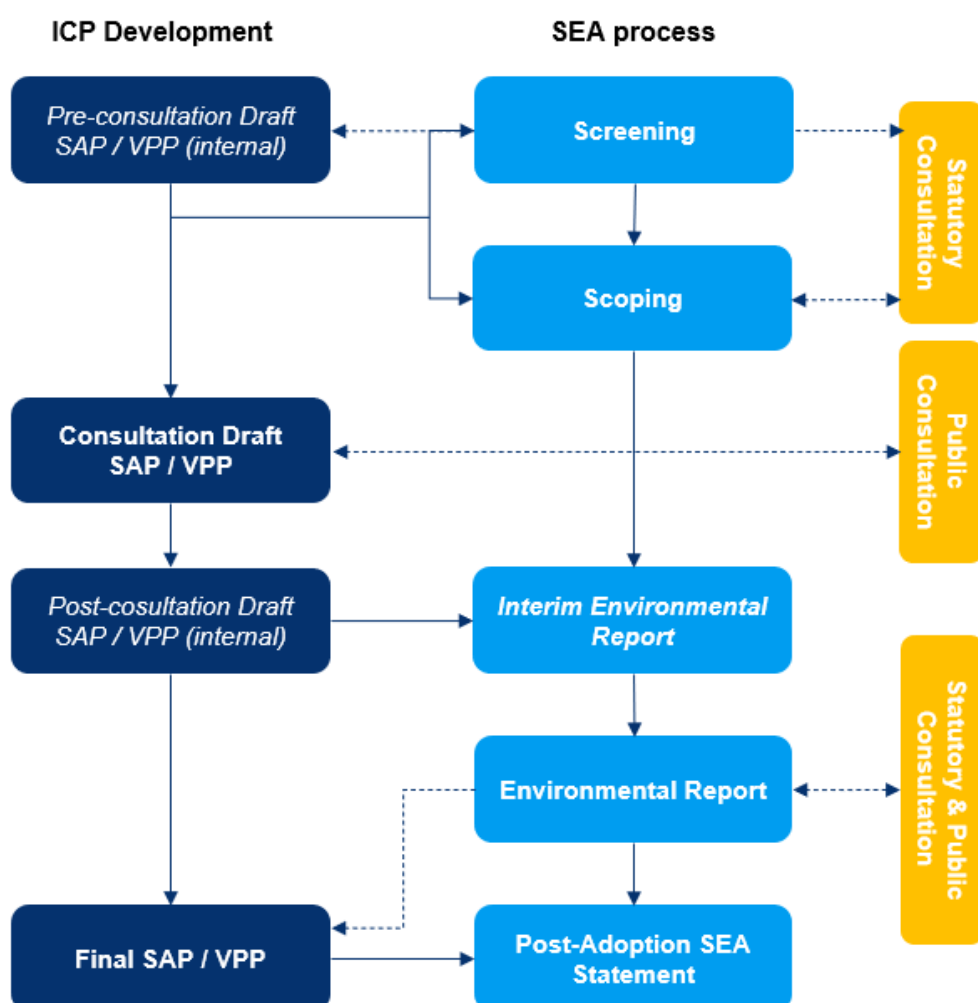


Figure 1 - SEA process followed in relation to the ICP development

The SEA process began with Transport Scotland producing a Screening Report which was issued, together with the pre-consultation draft of the SAP and VPP, to statutory consultation authorities in May 2023, concluding that the likelihood of significant effects could not be ruled out, and that on this basis an SEA would be required. Transport Scotland developed a Scoping Report was then issued in October 2023, and all statutory consultation authorities agreed with the overall approach, scope and level of detail proposed. Subsequently Ramboll developed a draft assessment framework, including some proposed amendments to the scope of the SEA, and additional detail on the assessment methodology, was subsequently developed and shared with statutory consultation authorities in December 2024. Overall, all three statutory consultation authorities agreed with the approach proposed.

Following public consultation and community engagement on the consultation draft of the SAP and VPP between February and May 2024, the SAP and VPP were revised by Transport Scotland to incorporate feedback received, and the December 2024 internal working versions of these documents were subject to initial assessment (Interim Environmental Report) intended for internal purposes, subsequently adapted into an [Environmental Report](#) (undertaken by Ramboll) for external statutory and public consultation, which ran between February and March 2025.

This Post-Adoption SEA Statement has been prepared in line with the requirements of the Environmental Assessment Act (Part 3, section 18(3)) and concludes the SEA process. It documents the following:

- how environmental considerations have been integrated into the ICP;
- how the environmental report has been taken into account;
- how the opinions expressed in response to the publication of the Environmental Report have been taken into account;
- the reasons for choosing the ICP as adopted, in the light of the other reasonable alternatives considered; and
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the ICP (if any).

Integration of Environmental Considerations into the ICP

The ICP places the interests of island communities at its core whilst anticipating a number of indirect environmental benefits, particularly in relation to improved public transport connectivity that could potentially have an indirect benefit of reducing reliability on private vehicles. The ICP also considers the impact that climate change can have on transport networks and aims to improve the technical and weather reliability and resilience of vessels and ports.

Consideration of the Environmental Report

Assessment Process

The assessment of the SAP and VPP was undertaken using a bespoke assessment framework, developed by Ramboll in consultation with statutory consultees, that interrogated the SAP and VPP components to target potential effects on agreed SEA objectives, assessed in a qualitative manner. The objectives comprised the following:

- SEA Objective 1 – Air Quality
- SEA Objective 2 – Noise
- SEA Objective 3 – Soil/Sediment
- SEA Objective 4 – Water environment
- SEA Objective 5 – Biodiversity
- SEA Objective 6 – Cultural Heritage
- SEA Objective 7 – Landscape
- SEA Objective 8 – Material assets
- SEA Objective 9 – Population and Human Health

The assessment process also included the assessment of cumulative effects, evaluating the significance of potentially overlapping effects on each SEA objective. The assessment also identified mitigation and enhancement measures aimed at avoiding/minimising negative environmental effects and/or enhancing positive effects.

Findings of the Assessment and Consideration

SAP – ICP Vision

Regarding the ICP Vision, the SEA findings concluded that whilst the primary drivers of the ICP directly/indirectly contributed to long-term benefits associated with SEA objectives 8 (material assets) and 9 (population and human health), it was not clear whether the ICP Vision would lead, in practice, to positive or negative effects on the natural and/ or historic environment (SEA objectives 1 – 7), and accordingly these were rated as unknown. Although no mitigation was considered necessary, proposed enhancement included to consider rewording the overall Vision and/or accompanying text, or adding new text elsewhere in the document, to include specific reference to the protection and enhancement of Scotland's unique natural and historic environment when designing and implementing policies and actions that support the Vision, and to clarify how the term 'sustainability' applied explicitly to the ICP Vision.

Although the wording of the ICP vision has remained unchanged, accompanying text in the SAP does now highlight environmental benefits that the ICP supports, particularly in relation to improved public transport connectivity that could reduce reliability on private vehicles. There is also further clarity on how the term 'sustainability' applies, i.e. through the support of greener travel, and specific reference to the protection of the natural and historic environment is now made under the fourth priority 'Low Carbon and Environmental Impact' described in the SAP.

SAP Outcomes

Individually, the Outcomes were identified to potentially have positive, neutral and unknown effects on SEA objectives 1 – 7, as the number of services and associated vessel/vehicle/people movements could increase or decrease as a result of the ICP, in combination, a clear intent to reduce the overall dependency on private vehicles to access ferry services by facilitating a better integration with public transport and encouraging active travel was perceived; and, for any new vessels/services to be more efficient and less polluting.

The SAP Outcomes were considered to have overall positive effects on SEA objectives 1 (air quality) and 8 (material assets), and positive significant effects on SEA objective 9 (population and human health), as multiple and complementary

benefits to ferry-dependent communities were identified. Potential cumulative effects on other SEA objectives were rated as unknown.

The following mitigation and enhancement measures were proposed, noting to what extent these have been considered in the adopted SAP:

- The Priorities/Outcomes mainly cover ferry services, active travel and public transportation, and although aviation and potential new fixed links of bridges, tunnels and causeways, are described in the SAP, these modes of transport/infrastructure elements are not specifically referred to in any of the four Priorities and associated Outcomes, the assessment stated that it is unclear how the ICP supports these – Priorities and associated Outcomes continue to exclude specific reference to how the ICP will support these transport modes, which shows that integration of ferry services with these transport modes remains the focus of the ICP. At the same time, the SAP notes that CNAs will further consider specific proposals associated with these transport modes where relevant.
- A recommendation was made to consider rewording the description of Outcomes to ensure these are Specific, Measurable, Achievable, Relevant, and Time-Bound (SMART) or to set out how progress towards the Outcomes will be monitored in a SMART way – the description of Outcomes has remained largely unchanged, the Monitoring and Evaluation Plan will set SMART targets that will help understanding and evaluating progress of the SAP over the short, medium and long-term, which is considered to have similar benefits.
- A recommendation was made to consider rewording the Outcomes (or their description in the SAP) to include/emphasise the benefits anticipated on the natural and historic environment, protection requirements and/or enhancement opportunities, which are relevant to ferry services, port developments, as well as other interventions associated with transport modes that are intended to support these – the adopted SAP further highlights the sustainable character of travel choices promoted across its four Priorities and associated Outcomes; extends the scope of outcome 4.2 to support the adaptation of infrastructure to climate change; and clearly commits to support the achievement of net zero targets. In addition, environmental criteria are now noted to be considered in the future Monitoring and Evaluation Plan. It should be noted that although Outcome 4.1 makes specific reference to the design and implementation of policies and actions that support the protection of the natural and historic environment, the only reference to these appears in the Commitments made under the theme “Environmental impact and low carbon”, which now includes an overall intention to “minimise the environmental impact of the next generation of vessels, harbours and ports

and ensure they are resilient to the impacts of climate change” and lists an increased number of Commitments (or actions), but not policies.

VPP Objectives

The VPP Objectives were individually considered likely to have both negative and positive effects on SEA objectives 1 - 7 for various reasons. In combination, these were rated positive for SEA objectives 1 (air quality) and 2 (noise), as the long-term benefits from the gradual decarbonisation of the vessel fleet and port infrastructure were considered to outweigh the potential short-term (not significant) negative effects that could arise during port construction, or the small-scale (not significant) negative effects that could arise in relation to potential vessel fleet growth. None of the negative effects identified were considered significant. Significant positive cumulative effects were identified on SEA objectives 8 (material assets) and 9 (population and human health), as individual positive effects were considered complementary and beneficial to strengthen port infrastructure and connectivity.

The following mitigation and enhancement measures were proposed, noting to what extent these have been considered in the adopted VPP:

- It was recommended to consider rewording the description of Objectives to ensure these are SMART or to set out how progress towards the Objectives will be monitored in a SMART way – this recommendation has not been taken forward, but as noted above, the Monitoring and Evaluation Plan for the wider ICP will set SMART targets that will help understanding and evaluating progress.
- It was recommended to consider rewording the Objectives or developing a separate set of principles or policies underpinning these to include reference to natural and historic environmental protection requirements and/or enhancement opportunities – the adopted VPP includes reworded Objectives 1 and 8 that now make specific reference to natural and historic environmental protection.

In addition, the section “Decarbonisation” has been replaced by the section “Environmental Impact and Low Carbon”, which places environmental protection requirements and opportunities for environmental mitigation / enhancement at the core of the business case process that informs decision-making.

VPP Project Categories

Similarly, the assessment of VPP Project Categories found that the long-term benefits achieved through the increased adoption of modern and less polluting vessels and overall decarbonisation of the vessel fleet and port operations, would

overall have positive effects on SEA objectives 1 (air quality) and 2 (noise), and significant positive cumulative effects on SEA objectives 8 (material assets) and 9 (population and human health). Cumulative effects on SEA objectives 3 – 7 were overall rated as unknown for both VPP Objectives and Project Categories.

The following mitigation and enhancement measures were proposed, noting to what extent these have been considered in the adopted VPP:

- It was recommended that consideration be given to including reference in the VPP to the principles by which new vessels should be designed and built and how environmental/heritage protection requirements are to be considered through existing project appraisal, development and business case approval processes – although design/building principles have not specifically been listed, as noted above, the VPP makes reference to environmental protection and opportunities for enhancement/mitigation to be integrated into business case processes.
- It was recommended that consideration be given to considering the development of policies/principles to follow during the planning of port upgrades, so environmental protection can be considered from the outset, and increase opportunities for enhancement measures to be considered at an early stage - although port upgrade planning principles/policies have not specifically been listed, as noted above, the VPP Objectives now include specific reference to natural and historic environmental protection.
- It was recommended that consideration be given to considering the addition of a specific reference to the requirement to adhere to circular economy/waste hierarchy principles as part of “principles for fleet renewal” or similar to further strengthen benefits to SEA objective 8 – this recommendation has not been taken forward.

Consideration of Consultation Feedback

Appendix 2 of the [Environmental Report](#) outlines public consultation feedback, on the draft SAP and VPP undertaken between February and May 2024, of relevance to the scope of the SEA, and indicates how this was considered in the development of the assessment framework. Feedback received was related to a number of topics that have also been covered in the adopted SAP and VPP, such as reduction of carbon emissions, uptake of renewable energy sources, consideration of environmental impacts, consideration of vulnerability of port infrastructure to climate change impacts, etc.

Consultee	Date received	Theme	Consultation Feedback	Consideration in the ICP
NatureScot	25 February 2025	General	I have reviewed the documents on behalf of NatureScot in relation to our natural heritage remit. We had the opportunity to make comment on the Draft Bespoke Assessment Framework in December 2024 and I am pleased to note that the comments we made within our response to the SEA Draft Bespoke Assessment Framework have been taken on board. I have no further comments to make on the SEA Environmental Report.	Noted.
SEPA	10 Mar 2025	General	In line with the procedures previously agreed between SEPA and SG we will not be submitting comments on this ER.	Noted.

Consultee	Date received	Theme	Consultation Feedback	Consideration in the ICP
CalMac	10 Mar 2025	Electric Ferries	Low Carbon & Env. Impact – Although electricity is being promoted as the low carbon alternative, there seems to be no mention of the lifecycle of these batteries and the impact of recycling - Strategic Approach Paper page 30	The Environmental Report recommends including, in the VPP, specific reference to adherence to circular economy / waste hierarchy principles as part of “principles for fleet renewal”, and to include the principles by which new vessels, engaged in the provision of lifeline services, should be designed and built. Although this recommendation has not been taken forward in the adopted VPP, the section “Environmental Impact and Low Carbon” requires investment planning to consider the frequency and cost of replacement batteries, and the recycling of these.
CalMac	10 Mar 2025	Shore Power Infrastructure	There is no mention of supporting infrastructure for the all-electric vessels. A lot of the shore power and infrastructure works will be captured under the SVRP programme umbrella and assumed to be part of the new vessels. Currently, the final business case for the SVRP sets out what shore power and infrastructure works will	Noted. Appendix 3 (Baseline) of the Environmental Report, section 'Material Assets' describes some of the existing and planned shore power infrastructure available in Scotland. The section “Small Vessel Replacement Programme (SVRP)” in the adopted VPP

Consultee	Date received	Theme	Consultation Feedback	Consideration in the ICP
			be required to accept the new vessels and how much it is likely to cost (An infrastructure review carried out by Mott McDonald). There is currently detailed design work being carried out for CMAL owned ports, which will go out to tender once funding is approved. 3 rd party ports are responsible for their own upgrades. There is also a CMAL led, tripartite shore power group that looks at the shore power for not only SVRP but other new vessel projects such as New Islay Vessels. The shore power will be the same for all new vessels - Strategic Approach Paper	indicates that port works, including shore power requirements are developed and shared through this programme.
Historic Environment Scotland	11 March 2025	General	SEA Requirements and Process: We understand that the consultation on this environmental report is accompanied by the consultation draft Strategic Approach Paper and Vessels and Ports Plan. In light of this the post-adoption statement will need to make clear how consultation responses on both the ER and its relevant documents have been taken into account from this consultation.	This Post-Adoption SEA Statement documents how environmental considerations and SEA findings have been incorporated into the ICP, including feedback during the consultation of the draft SAP and VPP in 2024 (further detailed in the Environmental Report) and of the Environmental Report in February and March 2025.

Consultee	Date received	Theme	Consultation Feedback	Consideration in the ICP
Historic Environment Scotland	11 March 2025	General	What are your views on the accuracy of the information used to describe the SEA environmental baseline? We are content with the high-level summary presented for the historic environment. However, the report would have benefited from setting out more specific commentary on the elements of the historic environment most likely to interact with the proposals of the plan.	Noted.
Historic Environment Scotland	11 March 2025	General	What are your views on the predicted environmental effects and mitigation measures? We note that a number of negative effects on cultural heritage have been identified through the assessment. We are generally content to agree with these findings and in particular note the potential interactions between the plan options and the historic environment through physical works associated with port upgrades.	Noted.
Historic Environment Scotland	11 March 2025	General	Statutory Consultation Feedback on Draft Assessment Framework (Dec 2024): This section states that no feedback was received from Historic Environment	Noted. We have indicated in this document that all three statutory consultation authorities provided feedback to the Draft Assessment

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			Scotland. Our response to the request for feedback on the SEA draft assessment methodology was issued to the SG SEA Gateway on 20 December 2024. However, it would appear from this section that this response did not reach you. We have therefore included it with this response for information.	Framework. We note that HES only had a minor comment on one of the assessment framework questions and request to extend SEA consultation period to 6 weeks, so it is not considered to have implications to the SEA findings.
Historic Environment Scotland	11 March 2025	General	Baseline Evolution and Trends: We note the reference here to Climate Ready HES. This document relates solely to HES as an organisation and the steps it is taking in managing and adapting the sites in its care. While the approaches taken will be of interest to others with stewardship responsibilities for historic environment assets it will not reflect the baseline relevant to the Islands Connectivity Plan.	Appendix 3 (Baseline) of the Environmental Report, section 'Cultural Heritage' includes a description of climate change and trends relevant to cultural heritage, which are noted in the Climate Ready HES and are considered relevant to Scotland's cultural heritage assets.
Mobility and Access Committee	12 March 2025	Impact Assessment - SAP outcomes	"Unknown Impact" on Marginalised Groups (Page 34, Outcome 2.1): The environmental assessment marks the impact of fair and safe access as 'unknown', which is unacceptable given the legal obligations under the Equality Act 2010. Why has this been marked as	The assessment of SAP outcome 2.1 is rated as positive for SEA objective 9 (population and human health). As further described in Appendix 4 of the Environmental Report, potential effects on SEA objectives 1 - 7 are rated as

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			unknown? Has feedback from disabled individuals been actively sought and incorporated into the planning process? If data is lacking, the consultation should extend its outreach to disability advocacy groups.	uncertain due to the uncertainty on whether this outcome would result in an increased number of vessel and vehicle movements across services / routes.
Mobility and Access Committee	12 March 2025	Impact Assessment - SAP outcomes	Potentially Ableist Assumptions (Page 80, Outcome 1.2): There is no explicit mention of disabled passengers or the specific accommodations required for them, which raises concerns that the assessment assumes an able-bodied perspective. Outcome 1.2 discusses people getting to where they need to go but does not explicitly consider disabled passengers who may need additional support, step-free access, or mobility accommodations. Does Outcome 1.2 assume an able-bodied perspective? How has the assessment ensured that disabled passengers' unique needs are considered?	As described in the SAP and Appendix 4 of the Environmental Report, outcome 1.2 focuses on the effective integration between ferry services and other transport modes, which would benefit all ferry users. SAP outcome 2.2 "will be easy to use for all" focuses on ensuring accessibility for all, reducing barriers where possible. Equality and accessibility are beyond the scope of the SEA and are considered separately in the Equality Impact Assessment of the ICP.

Table 1 - Environmental Report Consultation feedback outlines consultation feedback received on the Environmental Report published for public consultation between February and March 2025, and how this has been considered in the adopted version of

the ICP. In summary, feedback from five organisations was received, mostly including general comments, as well as specific points that have been considered in the adopted versions of the SAP and VPP.

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NatureScot	25 February 2025	General	I have reviewed the documents on behalf of NatureScot in relation to our natural heritage remit. We had the opportunity to make comment on the Draft Bespoke Assessment Framework in December 2024 and I am pleased to note that the comments we made within our response to the SEA Draft Bespoke Assessment Framework have been taken on board. I have no further comments to make on the SEA Environmental Report.	Noted.
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Historic Environment Scotland	11 March 2025	General	SEA Requirements and Process: We understand that the consultation on this environmental report is accompanied by the consultation draft Strategic Approach Paper and Vessels and Ports Plan. In light of this the post-adoption statement will need to make clear how consultation responses on both the ER and its relevant documents have been taken into account from this consultation.	This Post-Adoption SEA Statement documents how environmental considerations and SEA findings have been incorporated into the ICP, including feedback during the consultation of the draft SAP and VPP in 2024 (further detailed in the Environmental Report) and of the Environmental Report in February and March 2025.
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Consultee	Date received	Theme	Consultation Feedback	Consideration in the ICP
			likely to interact with the proposals of the plan.	
Historic Environment Scotland	11 March 2025	General	What are your views on the predicted environmental effects and mitigation measures? We note that a number of negative effects on cultural heritage have been identified through the assessment. We are generally content to agree with these findings and in particular note the potential interactions between the plan options and the historic environment through physical works associated with port upgrades.	Noted.
Historic Environment Scotland	11 March 2025	General	Statutory Consultation Feedback on Draft Assessment Framework (Dec 2024): This section states that no feedback was received from Historic Environment Scotland. Our response to the request for feedback on the SEA draft assessment methodology was issued to the SG SEA Gateway on 20 December 2024. However, it would appear from this section that this response did not reach you. We have therefore included it with this response for information.	Noted. We have indicated in this document that all three statutory consultation authorities provided feedback to the Draft Assessment Framework. We note that HES only had a minor comment on one of the assessment framework questions and request to extend SEA consultation period to 6 weeks, so it is not considered to have implications to the SEA findings.

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Mobility and Access Committee	12 March 2025	Impact Assessment - SAP outcomes	Potentially Ableist Assumptions (Page 80, Outcome 1.2): There is no explicit mention of disabled passengers or the specific accommodations required for them, which raises concerns that the assessment assumes an able-bodied perspective. Outcome 1.2 discusses people getting to where they need to go but does not explicitly consider disabled passengers who may need additional support, step-free access, or mobility accommodations. Does Outcome 1.2 assume an able-bodied perspective? How has the assessment ensured that disabled passengers' unique needs are considered?	As described in the SAP and Appendix 4 of the Environmental Report, outcome 1.2 focuses on the effective integration between ferry services and other transport modes, which would benefit all ferry users. SAP outcome 2.2 "will be easy to use for all" focuses on ensuring accessibility for all, reducing barriers where possible. Equality and accessibility are beyond the scope of the SEA and are considered separately in the Equality Impact Assessment of the ICP.

Table 1 - Environmental Report Consultation feedback

Reasons for choosing the ICP as adopted

The following reasonable alternatives were identified and assessed in the Environmental Report:

- **Maintaining the Ferries Plan.** Given that there is no legal requirement to have/implement a Ferries Plan, maintaining the existing one was considered a reasonable alternative, in which the Ferries Plan (2013 – 2022) would remain the default policy framework for decisions associated with transport for ferry dependent communities in Scotland.

The Environmental Report concluded that the expanded scope of the ICP in relation to the Ferries Plan could be considered to overall decrease the potential negative effects that implementing this alternative would have, and to overall increase the opportunities for environmental enhancement. In addition, maintaining an out-of-date plan would mean that existing issues that have been identified by island communities through consultation would not be addressed, and all decisions associated with transport for ferry dependent communities in Scotland would be made based on an assessment that was carried out back in 2009, contradicting higher-level policies, and potentially resulting in negative environmental effects.

- **No replacement Plan.** Given that there is no legal requirement to have / implement a Ferries Plan, concluding the existing one and having no replacement plan was considered a reasonable alternative, in which any decisions associated with transport for ferry dependent communities in Scotland would be made based on more generic and higher-level policies.

The Environmental Report concluded that making decisions based on more generic and higher-level policies would fail to address existing issues that have specifically been identified by island communities through consultation, hindering the management and delivery of ferry services by the Scottish government.

Overall, without a strategic vision, desired Outcomes, or sector-specific Objectives that guide the delivery of ferry services and associated infrastructure, there would be potential for negative environmental effects and lost opportunities for environmental enhancements that are achieved through the ICP.

Monitoring

Section 19 of the 2005 Environmental Act requires monitoring significant environmental impacts arising as a result of the implementation of a plan, programme or strategy. The purpose of the monitoring is to identify any unforeseen adverse effects at an early stage and to enable appropriate remedial action to be taken.

The Environmental Report did not identify significant negative effects which would require monitoring.

The adopted SAP further describes the Monitoring and Evaluation Plan that will be developed to monitor progress on the wider ICP, which will consider the inclusion of environmental criteria, as recommended by the Environmental Report.



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