

# APPLICATION FOR REVIEW OF DECISION RELATING TO ISLAND COMMUNITY IMPACT ASSESSMENT

## REGULATION 5 OF THE ISLAND COMMUNITIES IMPACT ASSESSMENTS (PUBLICATION AND REVIEW OF DECISIONS) (SCOTLAND) REGULATIONS 2020

### Notes:

1. This form is to be used by an applicant applying for a review of a decision relating to an island community impact assessment (“ICIA”) under regulation 5 of the Island Communities Impact Assessments (Publication and Review of Decisions) (Scotland) Regulations 2020.
2. You may download this form and complete it manually or electronically.
3. If you complete the form manually, please do so using black or blue ink and capital letters.
4. Whether you complete the form manually or electronically, you may continue any answer on a separate sheet of paper. If you do this, please—
  - indicate on the form where any answer is given or continued on a separate sheet,
  - indicate on each separate sheet the question number(s) to which it relates.
5. This form must be submitted directly to the relevant authority identified in Section 3. For details of where to send this form and attached documents, please visit [www.gov.scot](http://www.gov.scot) and search for “empowering our island communities”.
6. Failure to supply all relevant information could invalidate your application.

### SECTION 1 - WHO IS APPLYING

1.1 Please put an “X” in the relevant box:—

Applicant is an individual

Applicant is a community controlled body

Applicant is a relevant local authority

1.2 Please state who is applying for the review:

Alex Harvie, Chair of Cumbrae Community Council

## SECTION 2 – DETAILS OF WHO IS APPLYING

2.1 Please supply the contact details of the applicant:

Postal Address: [INFORMATION REDACTED IN ACCORDANCE WITH REGULATION 9(2)]

Postcode: [INFORMATION REDACTED IN ACCORDANCE WITH REGULATION 9(2)]

E-mail: [INFORMATION REDACTED IN ACCORDANCE WITH REGULATION 9(2)]

Yes  No

2.2 Please confirm if you agree to all correspondence regarding your application being sent by e-mail (put an X in the box)?

## SECTION 3 – DETAILS OF RELEVANT AUTHORITY

3.1 Please provide the name of the relevant authority who made the decision which you are applying to have reviewed:

David MacBrayne Limited (company number SC015304)

## SECTION 4 – GROUNDS FOR REVIEW

4.1 Please mark an “X” in the relevant box to confirm which ground applies to this application (tick one box only, unless both grounds (ii) and (iii) apply):

- (i) the applicant disagrees with the published explanation of the relevant authority for not preparing an island communities impact assessment,
- (ii) the applicant considers that the relevant authority, in making its decision, has failed to describe the likely significantly different effect of the policy, strategy or service (as the case may be),
- (iii) the applicant considers that the relevant authority, in making its decision, has failed to assess the extent to which the relevant authority considers that the policy, strategy or service (as the case may be) can be developed or delivered in such a manner as to improve or mitigate, for island communities, the outcomes resulting from it, or
- (iv) the relevant authority has reviewed a policy, strategy or service and has decided not to prepare an island communities impact assessment for that policy, strategy or service and has not published an explanation for not preparing an island communities impact assessment and the applicant considers that policy, strategy or service has an effect on an island community which is significantly different from its effect on other communities (including other island communities) in the area in which the relevant authority exercises its functions.

## SECTION 5 – DETAILS OF DECISION TO WHICH THE APPLICATION RELATES

5.1 Please supply the following details about the decision:

Has an ICIA been prepared? (put an X in the box)?      Yes       No

If Yes, date of publication of ICIA:

If No, has the relevant authority published reasons for not preparing an ICIA? (put an X in the box)      Yes       No

If Yes, date of publication of reasons: 27/02/2026 - Email from Victoria Shaw, Area Manager – Clyde North, CalMac Ferries Limited, to Cumbrae Ferry Committee, Cumbrae Community Council, Elected Members and others.

If No, please provide details of the policy, strategy or service to which this application relates:

## SECTION 6 - STATEMENT OF REASONS

6.1 You MUST state, in full, why you are applying for a review of the relevant authority's decision. Your statement must set out all matters you consider require to be taken into account in determining the review.

Note: you might not have a further opportunity to add to your statement of reasons at a later date, so it is essential that you produce all of the information you want the decision-maker to take into account. You will though be entitled to comment on (i) any additional matter which may be raised by the relevant authority in its response to your application, or (ii) any representations the relevant authority might receive from any other person or body.

State the reasons for your application and all matters you wish to raise here. (If necessary, this can be continued or provided in full on a separate document.)

The ferry service between the Isle of Cumbrae and Largs is a lifeline service – meaning it is considered critical infrastructure for daily life. It is the only public transport service between Cumbrae and the mainland, and it is one of the busiest ferry services in Scotland, with 725,000 passenger journeys and 198,000 cars in 2025. The service has been operating on the basis of a 15 minute turnaround for many years without incident and without CalMac Ferries Limited raising any concerns about its safety. Even at this frequency however, queues are common at peak periods, often resulting in waits of 1.5 hours and sometimes up to 4 hours.

Despite this, David MacBrayne Limited (the parent holding company of CalMac Ferries Limited who operate the service) proposes increasing the time for the turnaround of sailings from 15 minutes to 20 minutes. This represents a 25% reduction in the number of ferry crossings and is the result of a 'one size fits all' policy across all CalMac services, changing the way that passengers embark and disembark.

The Islands (Scotland) Act 2018 was introduced to improve outcomes for island communities by recognising their distinct circumstances, even when comparing one island to another. It is a response to the fact that Scotland's islands are suffering population decline and have fragile economies that are heavily reliant on tourism and are particularly vulnerable to external shocks. It requires that an

Island Communities Impact Assessment (ICIA) is prepared by relevant authorities such as David MacBrayne Limited where a policy, strategy or service change is: “likely to have an effect on an island community which is significantly different from its effect on other communities (including other island communities).” However, CalMac have decided not to prepare an ICIA in relation to the change in the frequency of the ferry service between Cumbrae and Largs.

The published explanation for this (email from Victoria Shaw, Area Manager - Clyde North, CalMac Ferries Limited, dated 27/2/2026) states that the change does not meet the required threshold for an ICIA, but it does not provide sufficient evidence to justify this.

This represents a failure on the part of CalMac to properly understand and comply with the requirements of the Islands Act. The explanation focuses on operational and safety considerations, largely in relation to their impact on CalMac itself. It does not assess the ways the reduction in frequency affects the community on Cumbrae, or how this is different to its impact on other communities – as the Act requires.

Missing considerations include:

### **Economic impacts**

The published explanation does not consider:

- Impacts on tourism, visitor numbers, and local business turnover.
- Effects on workers commuting to or from the mainland.
- Challenges in attracting or retaining workers.
- Frequency and costs of accessing markets and supply chains.
- Long-term business sustainability.

These are recognised ICIA considerations and are uniquely significant for a small island economy.

### **Access to essential services and impact on wellbeing**

The decision does not assess:

- Access to healthcare, social care, education and essential appointments.
- Impacts on vulnerable groups, including elderly and disabled people.
- Effects of longer waits on time-sensitive travel.
- Ability of care workers and support staff to travel to the island.
- Effects on isolation, mental health and social participation.
- Young people’s ability to access mainland activities

These are mandatory considerations under ICIA guidance.

### **Demographic / population-sustainability**

The authority has not considered whether reduced service frequency affects:

- The attractiveness of island living.
- Depopulation pressures.
- Young people’s access to opportunities.
- Local employment opportunities.
- The ability to attract and retain working families.
- Seasonal population fluctuations.
- The cumulative effect on island life and the viability of island living.

These are central to the Islands Act's purpose.

### **Community consultation**

The authority summarises concerns raised at drop-in sessions but does not:

- Assess whether those concerns indicate differential impact.
- Consider whether they trigger the threshold for an ICIA.
- Demonstrate how community evidence was weighed and mitigated.

The Islands Act requires meaningful consideration of community concerns, not mere recording.

### **Conclusion**

An ICIA would quantify, analyse and consider mitigation for each of these issues, not simply note them.

A relevant authority cannot avoid an ICIA simply by:

- Calling the change “operational”.
- Stating that safety is the primary driver.
- Claiming impacts are “not significant” without evidence.
- Saying the ICIA “would not change the decision”.

The Islands Act requires an ICIA if there is a likelihood that the impact of the change could be “significantly different”, whether the decision-maker believes the outcome is predetermined or not is irrelevant:

- The threshold test concerns impact, not decision outcome.
- The Act does not permit avoiding an ICIA because the authority believes their decision is justified.
- An ICIA is required even where the authority believes the policy cannot be altered.
- If the authority believes that impacts are not “significantly different” it must provide a comparative analysis to support that assertion.

## **SECTION 7 - STATEMENT DEMONSTRATING DIRECT EFFECT**

7.1 You **MUST** state, in full, how you have been, or are likely to be, directly affected by the policy, strategy or service to which the decision relates.

This application has been submitted by Cumbrae Community Council on behalf of the residents, businesses, workers, and service users on the Isle of Cumbrae. All of these groups are directly affected by the decision to reduce the Cumbrae ferry frequency. The ferry is the island's sole lifeline transport link, and any change has an immediate, significant and unavoidable impact on the daily lives of the groups we represent:

### **Essential daily travel**

Island residents rely on the ferry for all access to the mainland, including:

- Employment and commuting.
- Education and training.
- Healthcare appointments.
- Shopping and essential services.

- Family responsibilities and caring duties.
- Social care and support services.

A reduction in frequency increases waiting times, reduces flexibility, and makes routine travel more difficult for the entire community. It increases the likelihood of missed or delayed appointments and extends total travel time, disproportionately affecting elderly, disabled, and other vulnerable people.

### **Economic impacts**

The island economy is highly dependent on:

- Tourism and day-visitor traffic.
- Local businesses, who require reliable access to suppliers and customers.
- Workers travelling to and from the mainland.

Longer intervals between sailings reduce capacity at peak times, discourage visits, and increase the risk of missed connections, directly affecting business turnover and economic resilience.

### **Transport connectivity**

Many residents depend on onward bus and rail connections from Largs. Longer gaps between ferries:

- Reduce the number of viable connections.
- Increase waiting times.
- Heighten the impact of even minor delays.

This directly affects workers, students, vulnerable people and those attending time-sensitive appointments.

### **Community wellbeing and social participation**

The ferry service is fundamental to:

- Preventing social isolation.
- Enabling participation in cultural, recreational, and family activities.
- Maintaining community cohesion.

Reduced frequency restricts mobility, increases planning burdens, and diminishes the quality of life for island residents.

### **Increased vulnerability to disruption**

Because the island has no alternative transport route, any reduction in frequency:

- Amplifies the impact of planned and unplanned cancellations.
- Reduces resilience during adverse weather.
- Increases queuing and congestion pressures.

This directly affects residents, visitors, and businesses.

### **Impact on population sustainability**

The viability of island living depends on reliable, frequent transport. Reduced frequency:

- Makes commuting less practical.

- Discourages families and workers from settling on the island.
- Contributes to long-term demographic fragility.

### **Conclusion**

With no alternative transport mode, ferry connectivity is a critical lifeline, not a convenience. Queues at peak periods have always been problematic and islanders have long been fighting for an increase in capacity not a reduction.

A reduction in ferry frequency with no proposed mitigation at peak periods, will have a direct, significant, and unavoidable impact on the island community, which is different from its impact on other island communities or the mainland.

It is clear therefore that the Islands Act requires that an ICIA is prepared.

## **SECTION 8 - LIST OF DOCUMENTS / EVIDENCE**

8.1 Please provide a list of all documents, materials and evidence which you have provided with your application and intend to rely on in support of your application and ensure that the documents are clearly numbered (if necessary, this can be continued or provided in full on a separate document).

1. Email from Victoria Shaw, Area Manager – Clyde North, CalMac Ferries Limited, dated 27/2/2026, sent to Cumbrae Ferry Committee, Cumbrae Community Council, Elected Members and others.
2. The Islands (Scotland) Act 2018. <https://www.legislation.gov.uk/asp/2018/12>
3. The Island Communities Impact Assessments (Publication and Review of Decisions) (Scotland) Regulations 2020. <https://www.legislation.gov.uk/ssi/2020/465/contents/made>
4. The National Islands Plan 2026. <https://www.gov.scot/publications/national-islands-plan-2/>
5. The National Islands Plan 2019. <https://www.gov.scot/publications/national-plan-scotlands-islands/documents/>
6. Island communities impact assessments: guidance and toolkit. <https://www.gov.scot/publications/island-communities-impact-assessments-guidance-toolkit-2/>

Further evidence can be provided upon request.

### **The relevant authority will publish all documents relating to the review on its website.**

If you take part in the review process or use the website of the relevant authority, the relevant authority may collect certain information about you. If the relevant authority is the Scottish Ministers, to find out more about what information is collected and how the information is used and managed, please read the Scottish Government island community impact assessments review of decisions procedure privacy notice on the Scottish Government Website [www.gov.scot](http://www.gov.scot). For any other relevant authority, please see the website of that relevant authority for details of their privacy notice.

### **DECLARATION**

I apply to the Relevant Authority as set out on this form and supporting documents.

Signed [INFORMATION REDACTED IN ACCORDANCE WITH REGULATION 9(2)]

Date 29/3/2026

Alex Harvie, Chair of Cumbrae Community  
Council

This form and all supporting documents should be sent to the relevant authority identified in Section 3. Details of the contact addresses for each relevant authority can be found on the Scottish Government Website [www.gov.scot](http://www.gov.scot).