

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 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:

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

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)]

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

2.2 Please confirm if you agree to all correspondence regarding your application being sent by e-mail (put an X in the box)? Yes ☒ No ☐

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: N/A.....

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: 27/05/2026

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, carrying 725,000 passenger journeys and 198,000 cars in 2025.

Over the past 40 years the winter ferry service to Cumbrae has operated on the basis of a 30-minute service with a 5-minute turnaround. In December 2025 CalMac Ferries Limited changed their approach to loading and unloading vessels by separately loading and unloading vehicles and foot passengers. Although this slightly extended the loading / unloading times, this change did not compromise the high punctuality rate. The revised protocols for loading and unloading passenger safely were managed successfully for the 4 months from December 2025 to March 2026 with high punctuality and a service that continued to meet the community needs for connectivity.

Despite this, David MacBrayne Limited (the parent holding company of CalMac Ferries Limited who operate the service) now proposes increasing the time for the turnaround of sailings from 5 minutes to 10 minutes. This results in the service frequency changing from 30 minutes to 40 minutes for winter 2026-27. This represents a 25% reduction in the number of ferry crossings and compromises connectivity with mainland service provisions.

The *Islands (Scotland) Act 2018* was introduced to improve outcomes for island communities by recognizing their distinct circumstances, even when comparing one island to another. It recognises

that they 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 public 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, David MacBrayne Limited have decided not to prepare an ICIA in relation to this change.

The explanation for this was published by CalMac on 27th May 2026 on their website as an “ICIA Screening Questionnaire” for the Largs to Cumbrae Route for the Winter 2026-27 Timetable. This states that the change does not meet the threshold, but it does not demonstrate that the threshold has been properly considered or evidenced.

This represents a failure to properly understand or comply with the requirements of the Islands Act. The decision proposes increased turnaround times but does not assess how the reduction in frequency affects the island differently from other communities.

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.
- Access to, frequency of and costs of markets and supply chains.
- Challenges attracting or retaining workforce.
- 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 has not evidenced any community consultation, and the Islands Act requires meaningful consideration,

Conclusion

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

A public body cannot avoid an ICIA simply by:

- Considering impacts network wide with no reference to the specific island community affected by the change "Overall, impacts are considered broadly consistent and not uniquely severe for any specific community".
- Stating that the service will "remain unchanged in principle" with no analysis of the impact on the community.
- Claiming impacts are "not significant" without evidence.
- Selectively identifying that "capacity to meet demand" will be in place without considering the significant impact of the connectivity reduction on the island community.
- Ignoring onwards connectivity to other public transport links.

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 the island affected won't be made worse than another non comparable island community.
- 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 and the Cumbrae Ferry Committee on behalf of the residents, businesses, workers, and service users of the Isle of Cumbrae. All of these groups are directly affected by the decision to reduce the Largs-Cumbrae ferry frequency and significantly affect connectivity with mainland services.. 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 vulnerable residents. Increased travel time for commuters compromises the sustainability of their involvement in island life (whether commuting onto or from the island).

Economic impacts

The island economy is highly dependent on:

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

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

Transport connectivity

The previous timetable connected to the mainland at the same time every hour whereas CalMac's proposal for winter 2026-27 means that sailings arrive at different times every hour which significantly compromises connectivity with other transport operators. Many residents depend on onward bus and rail connections from Largs. Longer gaps between ferries and loss of connectivity

- Reduce the number of viable connections.
- Increase waiting times.
- Heighten the impact of even minor delays.
- Compromises the ability of people to travel onto and off the island impacting both service providers to the island, and islanders travelling from the island.

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

Community wellbeing and social participation

The ferry is fundamental to:

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

Reduced frequency restricts connectivity and 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 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 with high-quality connectivity. 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. In winter the key requirement is consistent connectivity to sustain the island community which is heavily integrated into mainland life for work, commuting, healthcare, education, social care, fuel and all aspects of life as part of North Ayrshire community. The previous timetable connected to the mainland at the same time every hour whereas CalMac's proposal for winter 2026-27 means that sailings arrive at different times every hour which compromises connectivity with other transport operators.

A reduction in ferry frequency 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. ICIA Screening questionnaire published by CalMac
<https://assets.calmac.co.uk/media/20qhsgll/screening-questionnaire-largs-cumbrae-winter-tt-2627.pdf>
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. 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 : 12th August 2026

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

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.