

I'm following up from our Teams meeting of Friday, to summarise our response and add some further detail. We do understand the challenges of satisfying the needs of all the island communities you serve, particularly when the tools you are given to do the job are so inadequate. These proposed winter timetables are seriously flawed however, and we have to protest them.

1. **It is completely unacceptable to be given such a limited amount of time to respond to such impactful timetable changes.** It was entirely possible for you to have provided us with draft timetables months ago, even if the dates on which they would have applied were unknown. All of the issues we list below would have had more time to be addressed, and all parties involved would have been better appraised of the potential impacts of any decision. This includes the Minister for Transport who was unaware of the impact on our community when she approved the measures to mitigate the Uig closure. This has been a complete failure of consultation, and as a result our communities have been refused the influence that CalMac's public rhetoric claims to give us. It is shocking that such a poor timetable proposal has crossed so many desks without correction; and that the most important consultee – the users – have been given no role until this last-minute presentation of a fait-accomplis.
2. With some key qualifications, the two-vessel timetable is generally net-positive. We welcome the increased sailing options with (on most days) earlier and later sailings. Thank you for confirming that an additional sailing can be operated on Sundays that will restore a final return from Oban at around 18:00. **Notwithstanding this, please see the comments below regarding the IOM's cycle time and public transport connections.**
3. The March timetable that will be operated by the MV Isle of Mull on her own does not have the fundamental failings of the single vessel Loch Frisa timetable, but again the IOM's extended cycle time and the impact this has on public transport connections and the number of sailings operated (four fewer return trips per week) does not have a sound justification and is an **unacceptable degradation of service.** See more below.
4. Regarding the proposed seven weeks of operation by the Loch Frisa on her own - **The Loch Frisa is incapable of delivering a single vessel service that offers adequate capacity or workable transport connections.** This should have been known from before the vessel was purchased, and those responsible for sanctioning the purchase without first assessing the winter service impact have demonstrated either incompetence or disdain, or both. No-one appears to have undertaken even the most rudimentary assessment of capacity versus demand, otherwise the huge shortfall would have been recognised. Neither have the fundamental connectivity failings been recognised. We were shocked to learn that this timetable could have been imposed on our islands for the **entire winter**, had the Uig closures gone ahead as originally planned. This just confirms that the purpose of the Loch Frisa purchase was not to provide a service improvement to Mull, but was instead a panic purchase of the only certifiable vessel on the market.
5. **Any timetable that relies on the Loch Frisa on her own is completely unacceptable for any length of time** because:
 - a. **Lifeline transport connections with Iona are hugely compromised,** including a reduction in the useable time in Oban from nearly six hours to less than three. This makes a day-trip to Oban all but useless for Iona and South Mull residents, hugely increasing the likelihood that a hospital or dentist appointment will require an overnight stay; making shopping trips risky and rushed and family or business visits pointlessly short.
 - b. The loss of the previously sacrosanct connection with the midday train departure from Oban for Iona residents.
 - c. Mainland bus connections have been ignored.

- d. **Earlier departure for school children from the Ross of Mull and Iona on Monday mornings.** For Iona children, this also brings an increased likelihood of cancellation due to more Iona sailings having to operate more frequently in hours of darkness to co-ordinate with the earlier Craignure departure. Iona childrens' education is already hugely compromised by the unreliability of the Iona service, and further degradation is intolerable. Last winter, up to 30% of school hours were lost due to ferry cancellation – earlier departures will only make this worse.
These children (up to 40 affected) will now have to rise fifteen minutes earlier than previously, some as early as 05:15am. They will now have no opportunity to eat until lunchtime (The Loch Frisa does not even have a functioning vending machine).
 - e. **The Loch Frisa provides completely inadequate capacity,** particularly for morning departures from Oban that are heavily used by carriers, trades and delivery trucks. Food deliveries and other supplies will be disrupted, and the cost of those deliveries inflated due to the reduced time carriers will have on-island. They will also have greater journey time should Oban-based carriers be forced to travel via Lochaline instead as a result – a diversion of some 66 miles. Islanders are already hamstrung by inadequate capacity in the summer months, and a service operated only by the Loch Frisa will repeat that experience in winter. See the tables below for an analysis of demand versus capacity.
 - f. The weather resilience of the Loch Frisa in winter conditions is unknown, but there is good reason to believe that this small and top-heavy vessel that was designed to operate across 3.5 miles of sheltered fjord may prove unreliable when asked to traverse 9 miles across the Firth of Lorne in winter. Sole reliance on this untested vessel is not acceptable.
6. **The proposal to swap between three different timetables during the winter will cause huge confusion among users,** and will require bus operators to regularly change timetables to suit – and also to successfully communicate those changes. This will be even more difficult during periods of disruption elsewhere when the major vessel is called away and Loch Frisa has to operate on her own at short notice. Capacity will be particularly short during the February half-term holiday, when the Frisa is planned to be on her own.
 7. **Public transport connections that provide less than 15 minutes to make the connection between ferry and train or bus are not acceptable.** Shorter transfer times were introduced to the timetable in 2020, in what we understood to be an unavoidable consequence of Covid cleaning regimes. All timetables prior to 2020 allowed for at least 15 minutes to transfer, and any with less than that were **not permitted to be published by Transport Scotland.** Note for example that in previous years' timetables the first ferry on a Monday arrived 9 minutes before the train departed, but this connection was not published in your timetables, because it was deemed to be too short by Transport Scotland. You are now proposing to have people depend on connections with as little as 9 minutes to disembark and walk from one terminal to the other. This is completely unacceptable, and infeasible for those with luggage or impaired mobility. Should the ferry be delayed by any more than a couple of minutes, it would be a very tall order for even the fittest traveller. We will be alerting Transport Scotland to these unworkable connections.
 8. **The proposed 50 minute crossing/20 minute turnaround cycle for whichever major vessel is on the route is unjustified and unworkable.** For thirty-one years the MV Isle of Mull has operated to a 45/15 minute cycle, only interrupted by Covid and the additional cleaning regime required between sailings. We were told that this is due to:
 - a. **"Berth clashes"**. - This may be an issue for particular sailings, but it does not explain why **every** sailing requires an extra 10 minutes. If there are particular berth clashes, then this should only affect particular sailings.

- b. **“Clashes at the entrance to Oban bay”** - Again, this cannot be justification for an across-the-board increase in cycle times. This can only legitimately be an issue for particular sailings, not all of them. This is especially true in the winter when there are fewer vessel movements.
- c. **“Increased traffic volume”** – This may be a cause of occasional delay in the summer months, but not in the winter. Whilst it is true that total carryings have increased since the introduction of RET, average summer loadings on each sailing have only risen very marginally, and average winter carryings remain well below those of summer. Average passenger carryings have actually **dropped** considerably. This is because the MV Isle of Mull is now dedicated to the route in winter (ie operating all her sailings to Mull rather than spending some time serving Colonsay) and in summer she has been joined by a second vessel. The evidence to support the notion that each sailing is consistently carrying a significantly higher volume of cars and passengers (and therefore requires 33% more time to load and unload) is thin. **The average summer vehicle loading per sailing has risen by approximately 2 cars – or just 5%.** See the chart below.

If turnaround times are being tested, then it is the process of loading and turning around that needs to be improved, rather than reduce service frequency. For example – are Masters’ berth approach techniques optimised? Could disembarkation of vehicles be sped up by installing traffic lights in Craignure? Will the new ticketing system reduce the number of cars loaded slowly one-by-one at the end of loading, when shore staff are unsure how many more vehicles will fit? Could time and space-consuming vehicles be encouraged to use under-utilised sailings? The very last ‘remedy’ for this issue should be reduction of service frequency – there are many process improvements that could be made first.

- d. **“Reduced reliability due to running engines at full service speed.”** Can anyone give any statistical or engineering evidence to back up this assertion, and explain the rationale for prioritising this over the needs of users to make public transport connections?

This increase in cycle time for the Isle of Mull will not just decimate winter travel connections, but it also threatens to embed the deterioration in service that we have experienced since the timetable of Covid times. If operating on her own, the Isle of Mull will only be able to operate **30** return sailings per week. Prior to Covid, she operated **35** returns per week in winter. This 15% reduction in frequency with such thin justification is unacceptable.

It is also worth pointing out that the timetable is a core part of the CHFS contract, in which an hourly cycle time is stipulated. It seems that this contractual requirement is being massaged in order to avoid late penalties, to the extreme detriment of users.

We have also written to the Transport Minister making our objections known. She has clearly not been in receipt of the full facts when sanctioning these timetables.

We look forward to your urgent response. Just six weeks remain until the winter timetable comes into force.

The only viable solutions we can see to this are either:

- a) You are provided with an additional vessel that prevents the need to redeploy a major vessel from our service.
- b) Dry-dock schedules are amended so that a major vessel is always available for our service.
- c) Uig works are postponed until you are provided with sufficient vessels to maintain services.

Yours,
Joe

Tables referenced at 5f above

Comparison of total carryings between November 1st and 13th 2019, versus proposed capacity for November 1st – November 13th 2022, Single Vessel Loch Frisa Timetable						
	Number of Sailings	Ferry car capacity	Total available car capacity	Number of cars carried	Number of sailings exceeding 34 cars	Capacity shortfall compared with 2019
2019	138	65	8,970	5,085	92 (66%)	
2022	126	34	4,284			801 spaces (16%)
<i>Total capacity for the period falls short by 16% - i.e. if all proposed Loch Frisa sailings filled to the maximum, 801 cars will not be shipped if demand matches 2019. If demand pattern matches 2019, vehicles will be denied travel on 2/3 of sailings.</i>						

Comparison of total carryings between January 19th – February 22nd 2019, versus proposed capacity for January 19th – February 22nd 2023, Single Vessel Loch Frisa Timetable						
	Number of Sailings	Ferry car capacity	Total available car capacity	Number of cars carried	Number of sailings exceeding 34 cars	Capacity shortfall compared with 2019
2019	337	65	21,905	9,860	119 (35%)	
2023	340	34	11,560			-
<i>Total capacity for the period is adequate, assuming demand is spread evenly across all sailings (which it will not be). If demand pattern matches 2019, vehicles will be denied travel on 119 sailings, or 35%.</i>						

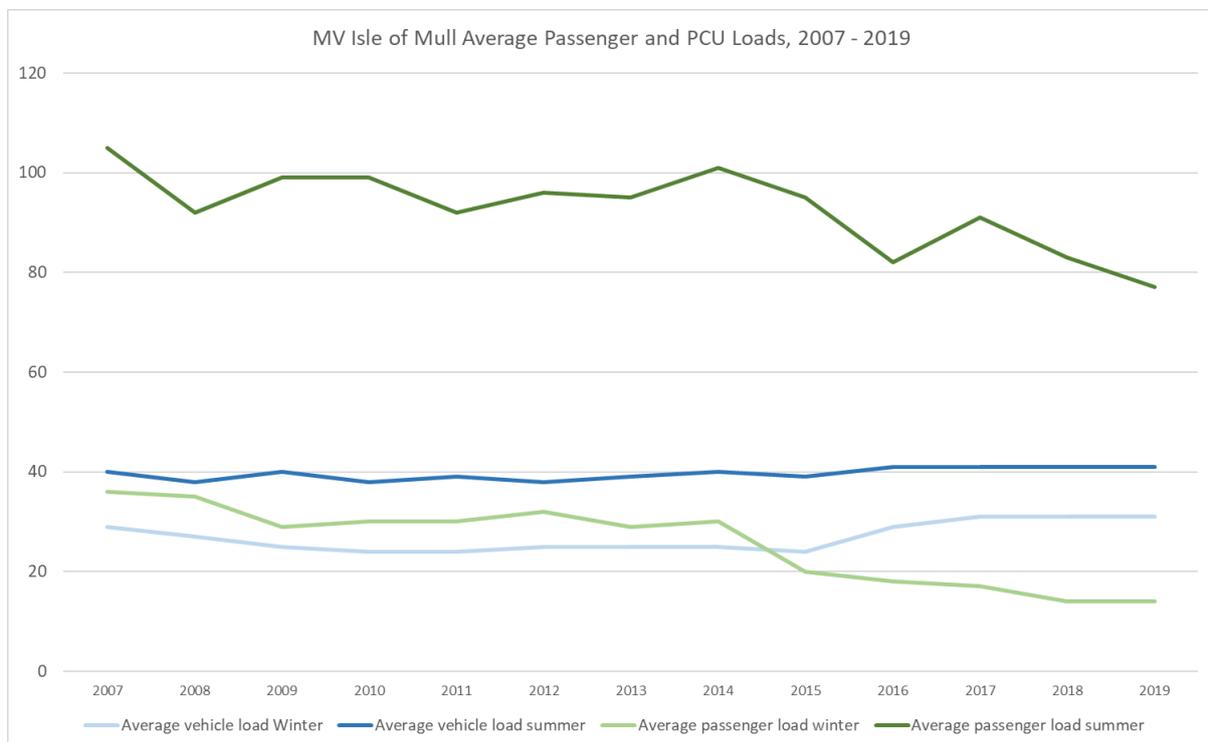
Single Vessel Loch Frisa timetable has acute shortage of capacity on morning sailings leaving Oban.					
Jan 19th 2019 – Feb 22nd 2019	<u>Average</u> vehicles (PCU) departing Oban on morning sailings (arriving Craignure before noon)	<u>Minimum</u> vehicles (PCU) departing Oban on morning sailings (arriving Craignure before noon)	<u>Maximum</u> vehicles (PCU) departing Oban on morning sailings (arriving Craignure before noon)	Proposed capacity of morning departures under single vessel Loch Frisa timetable	Capacity shortfall, Proposed versus 2019 average.
Monday – Friday	70	43	90	34	36 PCU (51%)
Saturday	29	28	44	34	-
Sunday	22	16	43	34	-
<i>There is a massive shortfall of capacity on weekday morning sailings departing Oban. Even if the number of morning sailings operated by the Loch Frisa was doubled, there would still be insufficient to meet even the average demand of 2019.</i>					
<i>There is just about sufficient capacity on Saturday and Sunday on the proposed timetable, if aggregated over the whole period (but there will still be insufficient capacity on particular days).</i>					

Single Vessel Loch Frisa timetable has acute shortage of capacity on morning sailings leaving Oban.

November 1st – 13th 2019	<u>Average</u> vehicles (PCU) departing Oban on morning sailings (arriving Craignure before noon)	<u>Minimum</u> vehicles (PCU) departing Oban on morning sailings (arriving Craignure before noon)	<u>Maximum</u> vehicles (PCU) departing Oban on morning sailings (arriving Craignure before noon)	Proposed capacity of morning departures under single vessel Loch Frisa timetable	Capacity shortfall, Proposed versus 2019 average.
Monday – Friday	85	75	100	34	51 PCU (60%)
Saturday	42	38	46	34	8 PCU (19%)
Sunday	38	35	41	34	4 PCU (10%)

There is an even higher shortfall of capacity on weekday morning sailings for this second proposed timetable period. In order to reasonably meet demand, the number of morning sailings operated by the Loch Frisa would have to triple – but that is impossible. Even on Saturday and Sunday there is insufficient capacity on every single sailing.

Graph of average passenger and vehicle loads, referenced at 8c above.





Mull & Iona Ferry Committee

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