

CLYDE FERRY USER GROUP RESPONSE TO DRAFT FERRIES PLAN CONSULTATION

GENERAL

The Clyde Ferry User Group welcome the opportunity to submit a response to the Consultation on the Draft Ferries Plan.

We are encouraged by much of what the Draft Plan outlines and welcome the recognition by the Scottish Government that Scotland's island and peninsular communities make a substantial contribution to the social, cultural and economic well-being of the nation and that ferry links to these islands and other remote and rural communities are an integral part of Scotland's transport network.

Whilst many of the aspects of the Draft Plan appear ambitious but justified, the lack of detail associated with cost, affordability and timescales for their implementation does not give real confidence that all the proposals made in the Draft Plan are achievable given the economic constraints that the country faces in the period to 2022 covered by this draft Plan. In this respect consideration could be given for extending the period covered by the Final Ferries Plan with the period to 2022 representing the short and medium term but initial information added on how Transport Scotland see ferry service delivery and improvements in the long term.

FUNDING AND PROCUREMENT OF INFRASTRUCTURE

The Clyde Ferry User Group welcomes the confirmation that the Government is committed to changing and improving ferry services so that they can continue to contribute to the economic development of the nation's fragile and remote rural communities. The appreciation of the significant challenges associated with the reductions in public sector spending and the implications to the affordability of any future Ferries Plan is noted.

However, the Draft Plan confirms that the Scottish Government is not in a position to determine the actual level of funding required over the period of the Ferries Plan and that the timing and funding of any changes is yet to be agreed.

As suggested above, the Clyde Ferry User Group is concerned that the affordability and hence feasibility of all of what is proposed has not been properly addressed even at this Draft Plan stage. The lack of a Scottish Transport Appraisal Guidance (STAG) type appraisal for each of the proposed routes and services options also causes concern in that the long-awaited Draft Plan and a number of its proposals could therefore be regarded as premature.

With regard to the procurement of new vessels, the Clyde Ferry User Group welcome the recognition of the urgent need to replace a large proportion of the CHFS fleet. To this end we welcome the fact that CMAL are investigating ways of raising finance that can achieve this end. We believe this will require a clear budget to be provided for this purpose and that CMAL have surety of funding in line with other Government agencies.

The borrowing powers of Local Authorities or Regional Transport Partnerships could be used to raise loans to purchase new ferries and invest in infrastructure. This is a pragmatic and affordable mechanism that could be useful in supporting fleet investment across the network.

With regard to responsibilities associated with ports and harbours, the Clyde Ferry User Group notes the Government's proposals to explore what would be involved if the latter, through CMAL, were to take responsibility for all ports used for the provision of subsidised ferry services currently owned by Local Authorities. Any movement towards this change should only happen in a consensual fashion with agreement of all parties.

Concerns have been raised by members of the Clyde Ferry User Group regarding passenger access facilities and who should maintain and replace them. It is recognised that the cost of

replacement and maintenance is significant and that revenue streams to enable this must be identified, whether that be through harbour dues or other means. This also forms part of the overall assessment of port ownership and operations.

With regard to the tendering of ferry services, the Clyde Ferry User Group would wish to express a desire to retain the current bundling of ferry services in the Clyde and Hebrides Ferry Services (CHFS).

The Clyde Ferry User Group agrees with the Government's suggestion that contract periods longer than the maximum six-year period permitted by EU procurement legislation would be beneficial. The Clyde Ferry User Group therefore supports the Government's exploration of this possibility with the European Commission. We note that longer contracts for the provision of ferry services are already operated in other EU member states.

FARES

The intention to provide a single over-arching fares framework instead of route-specific fare setting is welcome. The Clyde Ferry User Group agrees with the suggestion in the Draft Plan that the way fares are currently set is unnecessarily complicated and no longer fit-for purpose. The Clyde Ferry User Group welcomes the recognition that if fares are set too high it reduces travel, jeopardising the long-term sustainability of our island and peninsular communities.

A concern that the Clyde Ferry User Group would wish to express is the intention to increase fares by 6.5% per annum on non RET routes until such time as RET is implemented. This will have an unfair impact on the communities where RET introduction may not happen before 2016. The Ferry User Group would ask that RET introduction be accelerated for all island communities so that the benefits of this fair system of charging are enjoyed by all the communities served by through the CHFS contract.

While the RET pilot project in the Western Isles clearly demonstrated the social and economic benefits of this fair approach to ferry fare setting the formula that the Western Isles RET fares are set by may not be right for all routes. The Clyde Ferry User Group believe that there may be a need to have two other formulas for the calculation of RET fares. These would allow for routes where the distance/sailing time is short and where the current fixed amount built into the RET formula may be too large. A redesigned formula for longer sailing distances/times may also be required in the future.

The CHFS contract and Gourock – Dunoon contract should specify mandatory participation in SPT's integrated ticketing scheme where applicable on Clyde routes. This scheme could represent a useful launch pad for the introduction of smart card integrated ticketing across the CHFS, Northern Isles and Dunoon-Gourock contract networks. This will require a roll out of smartcard ticketing infrastructure at ticket offices, ports and on vessels that comply with SPT's ticketing scheme. This will allow ferry passengers to enjoy similar travel benefits as other transport modes and the Oyster scheme in London has set a standard that we must aspire to. SPT and HITRANS have expressed a desire to work with Transport Scotland on this project and this could help identify external funding from sources such as ERDF and INTERREG to off-set the costs of the project.

RESPONSIBILITY FOR PROVIDING FERRY SERVICES

The lack of consistency across Scotland with regard to the split of responsibilities for the provision of ferry services is noted by the Clyde Ferry User Group and it is agreed that the provision of "lifeline" services in Scotland and the development and implementation of a national policy framework should be the responsibility of the Government.

ACCESSIBILITY

The Clyde Ferry User Group welcomes the confirmation in the Draft Plan that the Scottish Government is firmly committed to equality for disabled people and is striving to “create a Scotland that is fair and inclusive to all”. The Clyde Ferry User Group also welcomes the recognition that accessibility is an issue for a wide range of passengers with disabilities and others, for example, people travelling with small children and people travelling with luggage.

It is suggested that compliance with equalities and accessibility legislation should be seen as an absolute minimum level of provision. The Clyde Ferry User Group would welcome initiatives within and developments to ferry services and infrastructure which would enhance the levels of provision above and beyond that required by legislation to demonstrate that the Government is seen to be leading by example.

The Draft Plan identifies the possibility of establishing an “Accessibility Improvement Fund”. The Clyde Ferry User Group welcomes this as a proposal but would like to understand better what form this Fund will take and who will administer it.

ENVIRONMENTAL ISSUES

The Clyde Ferry User Group shares the Scottish Government’s aspirations to mitigating climate change through a reduction in greenhouse gases and notes the indication that no route specific environmental problems have been identified from the operation of the ferry services covered by the Draft Plan. The Group welcomes the acknowledgement in the document that proposals to reduce vessel sailing speeds and increase journey times were universally unpopular when they were raised in the 2010 consultation on the Scottish Ferries Review. The Clyde Ferry User Group are grateful that proposals to increase journey times which would have a significantly negative socio economic impact have not been proposed in this Draft Plan. The implementation of lower vessel speeds to achieve reductions in emissions cannot be supported by the Clyde Ferry User Group.

The move towards more fuel-efficient vessels and the incorporation of alternative and renewable energy technology is welcomed by the Clyde Ferry User Group. The use of automated mooring systems and other measures to reduce ferry turnaround times allied with cleaner engine / fuel technology should be investigated. However, it is disappointing to note that no mention has been made within the Draft Plan of capturing and utilising these benefits to enable shorter crossing times to be achieved.

FERRY SERVICES

Response to Consultation Questions

Section A: About You

Q1. Are you responding on behalf of yourself or an organisation?

- a. Yourself (Go to Question 2)*
- b. Organisation (Go to Question 1b)*

Q1b. What is the name of the organisation?

Clyde Ferry User Group

Now Go To Section C

Q2. Are you resident of a community currently served by the ferry network?

- b. No (Go to Section C)*

Section C: Routes and Services – Proposals by Community

Firth of Clyde Arran

Our proposal is for (a) the Ardrossan to Brodick service to be upgraded to a two vessel service operating a more frequent shuttle service through to the late evening and (b) services between Claonaig to Lochranza would be reviewed following these changes to the Ardrossan to Brodick service. We may be able to achieve this change during the next CHFS contract (2013-2019) or it may be that this change is only possible as part of the vessel renewal programme to be published as part of the Final Ferries Plan.

Q7. *The community is asked for their views on these proposals.*

Reference is made by paragraph no. in the Review document from chapter 4.

Ardrossan/Brodick, the principal route:

A 2 ferry service is widely supported. Until such time as purpose built vessels can be used it is recommended to double crew the Caledonian Isles (CI) to allow the service to be extended for a longer service day. The service should permit commuting either to or from Arran on a daily basis. 2 vessels would enable a first sailing from each port before 7am.

2 vessels could better address expected capacity issues with the advent of RET.

It is important to ensure that any replacement vessel/s is fit for purpose i.e. designed and fitted to meet the sea conditions which prevail in the lower Firth of Clyde and in crossing currents without discomfort to passengers. It is also necessary that such vessels are sufficiently powered to negotiate berthing at exposed west of Scotland mainland ports. Any proposed increase in sailing time between Brodick and Ardrossan is wholeheartedly rejected.

P. 22 par. 30 Harbour Infrastructure:

The constraint identified at Brodick is planned to be addressed in 2013. The more significant constraint of berthing at Ardrossan even in only moderate wind conditions has not been mentioned in the Review. This has been expressed as a first priority by almost all respondents. Ardrossan is regarded as the preferred mainland port for the service but there is an urgent need for it to be made more accessible in adverse weather by further investment in the harbour infrastructure.

As well as this and in seriously adverse weather a contingent mainland port is essential and Gourock should be upgraded to allow the Arran ferry to berth as was previously the case before changes were made around the Gourock terminal. Wemyss Bay might suffice for a smaller vessel but is not accessible to the CI nor has it suitable marshalling space to serve both Bute and Arran.

Par. 31 Lochranza/ Claonaig/Tarbert:

This is deemed in the Review as a secondary route but it is seen as a vital link within the west of Scotland ferry network as it directly links North Ayrshire with Argyll & Bute. It is a part of the "Hopscotch" tourist route and has recently formed part of the Whisky Trail linking distilleries in Arran and Islay. This service carries dangerous goods unlike the CI and is recognised as a trading route between Arran and Kintyre. The comparison made in the Review with the carrying figs. for both Arran routes is unhelpful because of the difference of the capacities of the two types of ferry.

Tarbert, the winter port for this service is not mentioned in the Review. Tarbert is an all weather port. Currently the winter service makes only one sailing each way between Tarbert and

Lochranza being part of the Portavadie / Tarbert service and one return journey each way in winter is requested.

Resilience:

Recent disruption to the Brodick to Ardrossan service highlighted the limitations of the mainlan port. It also highlighted the need to have strong emergency planning in place. The Clyde Ferry User Group noted the ingenuity of local people in Arran who chartered the Kintyre Express Rigid Inflatable Passenger Ferry to travel from the island on urgent business. The Clyde Ferry User Group believe the operator should be encouraged to implement emergency plans that could involve this type of craft as part of the emergency planning in times of engineering failure and that emphasis could be placed upon this in future CHFS contract tenders.

Bute

Our proposal is to enhance the Colintraive to Rhubodach service, running the service through to midnight, thereby extending the operating day. The intention would be to include this proposal as part of the next tender for Clyde and Hebridean Ferry services in 2013.

Q8. We recognise that this is not the principal route, or the route that may most often be used for commuting purposes. The community is therefore asked for their views on this proposal and whether an extended service on this route would be well used.

The Clyde Ferry User Group welcome the commitment to maintain both ferry services to Bute. However we believe that there is little support for the proposal to extend the operating hours of the secondary service to Colintraive to midnight. This is due to the remoteness of the mainlan port at Colintraive from the centre and the lack of any public transport services in the evening that would allow any additional sailings to be useful. The Ferry User Group would support some additional services on the secondary route with the timetable extended to 2100 in the summer timetable and on certain days of the week in the winter.

Instead the Ferry User Group would ask that the priority for any investment on incremental timetable improvements be focussed on the primary route from Rothesay to Weymss Bay. The Ferry User Group support the proposal of the Bute community for an extended Friday evening service on this route. An extended Saturday evening service would also be desirable however the short term priority would be to extend the operating day on a Friday.

Cumbræ

Our proposal is to include a later evening service for one or two evenings per week. The intention would be to include this as part of the next tender for Clyde and Hebridean Ferry services in 2013.

Q9. The community is asked for their views on this proposal.

The Cumbræ service is considered by the Clyde Ferry User Group to be a model service that meets community needs very well. Any incremental timetabling improvements would of course be welcomed by the Group.

Cowal Peninsula and Dunoon

Scottish Ministers were disappointed not to be able to continue the vehicle and passenger service. However, the current contract was the best that could be achieved under the circumstances (particularly the restrictions imposed by the European Commission).

We are absolutely committed to providing a ferry service that meets the need of users and will continue to look at more options to improve the overall service and facilities.

Q10. The community is asked for their views.

The Clyde Ferry User Group welcome the statement in the Draft Plan that the Scottish Government are committed to providing a ferry service that meets the needs of users. We believe that these needs would be best met by reintroducing a vehicle ferry service from town centre to town centre.

The Clyde Ferry User Group welcome the three point plan that has been agreed between Scottish Ministers and stakeholders in the Dunoon – Gourock service. The Ferry User Group recognise that the Immediate Action Point of this plan, for Argyll Ferries to significantly improve the current service, has been evident in the improved performance and reliability of the service. The Clyde Ferry User Group would hope to see the Short, Medium and Long Term options develop and we hope to see this process result in the introduction of new tonnage on the route capable of transporting passengers and vehicles.

The ferry service from Kilcreggan to Gourock and Helensburgh should also be included in the Final Ferries Plan. This service is of real value to the passengers and communities it serves.

The Clyde Ferry User Group believe that the Final Ferries Plan should also explore the viability of a new vehicle and passenger ferry service to link a number of cross Clyde communities and this service could be linked to finding a solution to the lack of a town centre to town centre car service between Dunoon and Gourock. The service could provide an innovative way of linking Helensburgh to Gourock allowing useful travel between these centres. This service could be one new link in a chain of Clyde coast shuttle services that could link centres across and along the Clyde.

Kintyre

Our proposals are:

- *To retain the Kintyre to Portavadie service as is.*
- *To offer a vehicle service between Campbeltown and the Scottish mainland (for example Troon) one or two days per week.*

This would be subject to two smaller vessels being introduced on the Arran route.

Q25. The community is asked for their views on these proposals.

The Clyde Ferry User Group welcome the commitment in the Draft Plan to retain the Tarbert to Portavadie service as it currently operates. This service is a vital link to Argyll and offers a great deal in socio economic terms as a link for business and tourism. Its role in resilience has been crucial all too frequently in recent years during closure of the A83 at the Rest and be Thankful.

The Clyde Ferry User Group would support the introductions of an Ayrshire-Kintyre ferry route – initially on a limited basis (as suggested) and potentially utilising the additional Arran vessel during quieter periods of its operating week – albeit satisfactory vessels and timetables for both services would require to be established prior to the introduction of any new services.

Section D: Other Comments

Q27. Please use the section provided for any other comments you have on the content of the Draft Plan.

See information provided in the text that preceded the Ferry Services section. This sets out the views of the Clyde Ferry Users Group on the following areas of the Draft Ferries Plan:

- Funding and Procurement of Infrastructure
- Fares
- Responsibility for Providing Ferry Services
- Accessibility
- Environmental