

LOCHABER, SKYE, RAASAY AND SMALL ISLES FERRY USER GROUP RESPONSE TO DRAFT FERRIES PLAN CONSULTATION

GENERAL

The 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.

There are a number of key issues which the Ferry User Group consider high priority in any outcomes arising from the consultation and which they view as high priority in the decision making process. These are listed below:

- There should be no diminution of ferry services arising from the Review.
- The socio – economics of any ferry service catchment should not be adversely affected by the outcomes of the Review. Jobs and businesses within the ferry catchment should not be affected by any proposals.
- Ferry services should be improved to bolster the sustainability of rural communities served by the ferries.
- Ferry services should be improved with innovative ideas, better marketing and improved efficiency to assist local communities with new jobs and local business.
- Ferries should work towards reducing their carbon footprint
- The concessionary fares system should extend from the bus network to cover the ferry network.
- Disabled persons and their companions should be permitted free travel on the ferry network with this being administered by Scottish government.
- Timetables should be adjusted to accommodate commuter travel wherever possible
- Vessels and terminals should be designed to accommodate day return trip to access services and to avoid overnight stays. This will assist sustainable living in remote communities.
- Where economies or improvements to the ferry services are possible the Council is happy to talk to Scottish Government about the transfer of some ferry responsibilities to CMAL.
- The introduction of a Mallaig to Lochboisdale service should be considered as a means of improving the sustainability of the Southern Isles. This will also assist the sustainability of Mallaig as a ferry hub. The Scottish Government has invested significantly in the A830 trunk road significantly reducing the journey time from Mallaig to the Central Belt and the Ferry User Group believe that this reduced journey time allied with the shorter sailing time from Lochboisdale to Mallaig make it an extremely attractive opportunity.

- Development of ferry services from Uig should be considered and incremental improvements made to these services to meet capacity constraints on these routes that have emerged since RET was introduced.
- There needs to be improved marketing for all ferry services to maximise income and make sure that the ferry is more than a basic trip. This will encourage tourism and jobs and there is potential for targeting this marketing to provide a focus for particular ferry services that will benefit from increased custom. The Small Isles, Tobermory, and Raasay would all benefit from such an initiative.

FUNDING AND PROCUREMENT OF INFRASTRUCTURE

The 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 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 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 have been tasked with investigating alternatives to traditional Scottish Government Capital Grant funding. The Ferry User Group is very supportive of the work by CMAL to identify ways of raising new finance that can fund this infrastructure and vessel investment in the current economic climate where there is real pressure on the Government's capital budgets. 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 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.

With regard to the tendering of ferry services, the 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 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 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 lifeline nature of the ferry services that serve the many remote and rural communities has been recognised in the Draft Plan and it is noted that the finalised Plan will ultimately make recommendations that will seek to maximise the opportunities for employment, business, leisure and tourism.

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.

The Ferry User Group welcomes the proposed revised charging structure for commercial vehicles from 5m to 6m in length.

A concern that the 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 and peninsular 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 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 should specify mandatory participation in integrated ticketing schemes. The introduction of integrated smart card ticketing across the CHFS, Northern Isles and Dunoon-Gourock contract networks will require a roll out of smartcard ticketing infrastructure at ticket offices, ports and on vessels. 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.

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 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 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 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 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 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 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 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 Ferry User Group.

FERRY SERVICES

In response to the various questions posed in the consultation the Ferry User Group responds as follows:

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? The Lochaber, Skye, Raasay and Small Isles Ferry User Group

Now Go To Section C

Section C: Routes and Services – Proposals by Community

Mull (and Ardnamurchan/Morvern)

Our package of proposals are as follows:

To upgrade the Craignure to Oban service to a two-vessel service, operating as a shuttle-service through an extended operating day;

Following the upgrade to Craignure to Oban, to review operations on the Fishnish to Lochaline service;

To replace the current passenger and vehicle service on Tobermory to Kilchoan with a passenger-only service.

We may be able to achieve these changes during the next CHFS contract (2013-2019) or it may be that these changes are only possible as part of the vessel renewal programme to be published as part of the Final Ferries Plan.

Q11. The community is asked for their views on these proposals.

The Ferry User Group's view is that both the Lochaline to Fishnish service and the Kilchoan to Tobermory service should be retained in their present form or improved and upgraded. The Kilchoan to Tobermory service is essential for access to services in Tobermory and also for serving round trips for tourists through west Ardnamurchan and Mull. Kilchoan is part of a remote community poorly served by road who depend on their vehicular/ passenger ferry for many of the facilities that exist in Tobermory including shops, dental, medical etc. The Lochaline to Fishnish ferry service serves as a circular ferry link for travellers to Mull via Morven. It brings tourists and visitors into Ardgour, Morven and Ardnamurchan and has assisted in the development of the tourist industry and associated businesses in this area. It also serve as a ferry link for HGVs carrying timber to/from Mull as well as many other white vans and service vehicles to this area. Any reduction in this ferry service in either its carrying capacity or frequency or timeings can have an adverse effect on businesses and lead to loss of jobs in the area. It assists in keeping HGVs off the fragile road network.

Ardnamurchan/Morvern (Corran Ferry)

We are not proposing any changes to the Corran Ferry service.

Q13. The community is asked for their views.

The Corran Ferry is well run by Highland Council with a timetable covering the whole day from 06:30 hrs to 21:30 hrs. It has a modern ferry, the MV "Corran", capable of carrying HGVs and assists in reducing the impact of large vehicles on a fragile road network. Its travellers are commuters, service vehicles, business users and tourists covering the round trips through Mull, Ardnamurchan and West Lochaber

Skye

Our proposal is to continue to have a summer and winter service. For the summer service, recognising the revenue potential, we will offer minimum subsidy only. The winter service will continue to receive a subsidy.

We may be able to achieve this change during the next CHFS contract (2013-2019).

Q18. The community is asked for their views on this proposal.

It is not clear what is intended here for the Mallaig to Armadale ferry service but for the avoidance of doubt the Ferry User Group believes there should be no reduction in ferry service. No reduction in capacity, frequency or timetable timings. This service works well as an alternative over the sea to Skye ferry service and with considerable investment by Scottish Government on the A830 Trunk Road Fort William to Mallaig and the Highland Council on the A850 Broadford to Armadale road this along with the linkspans at the terminals have seen a major growth in the tourist industry and associated businesses along this route. This has been one of the successes of investment in infrastructure this past decade and there is a need to build on this and continue the success story.

Raasay

We have no specific proposals for Raasay at this stage but we intend to explore how we might extend the length of the operating day as part of the CHFS re-tender in 2013.

Q19. The community is asked for their views.

The Ferry User Group look forward to the new hybrid ferry that has been ordered for the Raasay to Sconser ferry link and agree that if the timetable can be adjusted and extended to better accommodate workers on mainland Skye this will assist sustainable living on the Isle of Raasay.

Small Isles

Our proposals are:

A new Sunday service to each of the Small Isles (for school children returning to school);

A Friday/Saturday level of service on more days (i.e. two sailings as opposed to one sailing per day);

At least one day per week where it will be possible for residents of each island to make a meaningful return trip to the mainland in the course of a normal working day.

We may be able to achieve these changes in the lead up to the next CHFS contract period. In the longer-term:

To replace the current single vessel with a two vessel service - a passenger and loose freight service on a daily basis to each of the islands, and a once-per-week roll-on/roll-off 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.

Q20. The community is asked for their views on these proposals.

The Ferry User Group supports the proposed changes to the ferry timetable to the Small Isles which will see an improved ferry service to each of the islands served. This will benefit school children and better able them to have a return trip home at the weekend and encourage sustainable living on their islands. This enhanced ferry timetable will be of benefit to tourists and visitors and encourage the tourist industry on the Small Isles.

In regard to the 2 ferry proposal there will be a need to ensure that the passenger vessel will be seaworthy in the winter months and that island residents are able to connect with the mainland during inclement weather.

Knoydart

Our assessment suggests that Knoydart would benefit from additional sailing days in both the summer and winter seasons.

The service is currently provided by a private operator with some public funding from Highland Council. Our proposal (in [Chapter 5](#)) on the future responsibility of ferry services is that we will discuss with Local Authorities whether they wish to transfer responsibility for

routes currently under their jurisdiction to the Scottish Government. Also, for commercially run services we will consider intervening where there is market failure and the service is considered to be lifeline.

Q21. As a first step the community is asked whether or not additional sailing days would be beneficial and well used.

Knoydart would benefit from additional sailings that would allow commuter travel from the peninsula to the mainland thus assisting with sustainable living in Inverie. There may be value in exploring the opportunity of developing a Mallaig hub for ferry services that would integrate the Small Isles, Knoydart and Armadale all focused on Mallaig. This may integrate with the proposed better service for the Small isles, improve the service to Armadale and provide a better timetable to Knoydart and at the same time improve freight management to both the Small isles and Knoydart.

Section D: Other Comments

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

Please see preamble above for comments on:

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