



## **SCOTTISH FERRIES REVIEW – CONSULTATION RESPONSE**

HITRANS welcomes the Opportunity to participate in the consultation into the Scottish Ferries Review and in preparing this response has itself sought input from the communities served by ferries within the HITRANS area.

Ferry Services are fundamental to the sustainability and development of a significant proportion of people living in the HITRANS area. Unlike other forms of public transport supported by Government there is no effective alternative to the link that ferries provide to our island and peninsular communities.

It is therefore encouraging in the Introduction to the Consultation by the Minister that the Review is focussed on identifying where changes and improvements to the ferry services can support and enable the creation of dynamic and growing economies of our island and peninsular communities.

While there are some 33 specific questions asked within the Consultation Document the aim of the questions seems to be to establish what consultees think about how ferries should be funded and procured, on what basis fares should be set, what kind of services should be supported by public funds, and who should be responsible for providing these services. HITRANS is concerned by focussing solely on such specific short term issues that the objective of the review, and indeed the reason for providing ferry services, may have been lost at this stage in the review process. Ferry services are provided and must be further developed with the single objective of promoting sustainable economic growth in the communities served, which is of course the central Purpose of the Scottish Government and the focus of its efforts across the whole of Scotland, as reflected in its key Economic Strategy.

The Draft Ferry Plan which will be developed following the review has been set a timeframe up to 2022 to tie into that set for the other current major transport review, the Strategic Transport Projects Review. The natural lifespan of ferry vessels is 30 to 35 years, and for related land based infrastructure up to 60 years. Given the wish within the review process to look at the operation and development of the network as a whole HITRANS considers it necessary to look at potential changes that could be introduced within a single lifecycle as a whole, nominally 30 years, to establish the long term impacts and benefits that proposed changes and improvements will bring about to the communities served. While the Draft Ferry Plan as an output from the Review is to cover the period up to 2022 it is important that the wider impacts and the necessary and related long term ferry strategy are assessed over the period up to 2040, with options being compared across the network over this longer timeframe, one that is of equal length to that set by the Treasury, as the minimum period for economic appraisals for capital investment at a UK level. This 30 year period accords with the Scottish Government's own STAG approach to appraisal, and should be fundamental to the Review. More demonstration of detailed high level appraisal of service options over a 30 year period, with costs and benefits discounted back to current day value, would make it easier for people to understand Government's reasoning for following particular policy and delivery paths, and

HITRANS asks that Scottish Government undertakes such consistent and comparable option appraisals and makes such information available before presenting its Draft Ferries Plan for the period up to 2022. This is equally important in the environmental as well as economic context.

All levels of Government are currently considering how they will work within the extremely challenging financial climate up to and beyond 2025, the date currently estimated at which expenditure may again in real terms be at a level equivalent to current expenditure levels. Ferry vessel and infrastructure needs have in the past been funded on the basis of short term funding commitments for what is an ongoing and regular funding requirement, leaving doubt within communities as to whether the necessary cyclical funding will be available. A commitment to establish a robust funding system to support the overall needs of delivering ferry services, with more long term surety would be welcomed.

Funding of ferry services across Scotland as a whole is challenging, but for Councils and other locally run services the problems are even greater. Capital funding requirements come in large one off peaks which are extremely difficult to manage and increasing above inflation pressures on revenue budgets to meet statutory safety requirements and increasing fuelling costs are not reflected in increases in core budgets to meet these pressures. An improved funding mechanism has to be found to support these key local services and this should be a key element of the Draft Plan.

The capacity of Councils to deliver local ferry services varies across the Highlands and Islands. All communities, and local Councils with areas served by ferries, as those with the greatest knowledge of local needs, want to have an active involvement in the decision making process that decides the nature of the ferry services provided. The Councils with larger networks work within a scale in which they have built up and can support the wide range of skills necessary to run ferries while those with smaller or no ferry networks find providing services directly very challenging.

A great deal of survey work has been commissioned to inform this Review and this is welcomed as it should produce an increased understanding of the needs of those using the ferry services. There have however been concerns raised at a number of the Public Consultation events by those who participated that the identified level of engagement through the household surveys was not a reflection of people's experience and that some of the conclusions reached in relation to the particular needs of individual ferry services were at significant odds with the understanding of those present. The limited advertising of the large number of consultation events held, and the resultant poor attendance achieved, dictates that further detailed engagement with stakeholders and communities must be held particularly in the matter of assessing the particular future needs of communities and related proposed investment prioritisation.

The Draft Scottish Ferries Plan should contain further details of the developing output from the preliminary prioritisation exercise in order that the wider community can have the opportunity to comment formally on any proposed categorisation before these are considered by Government and acted upon by their agencies. The 6 week period proposed for consultation on this critical document is inadequate to allow communities and their representatives to adequately consider the content and it is therefore recommended that this be increased to 12 weeks to provide key stakeholders, RTPs and Councils adequate time to respond, particularly as some of the critical background reports and research necessary to input fully into the process are not in the public domain at this time.

Recent operational issues which have arisen on the Clyde and Hebrides Ferry Services around the temporary failure of MV Clansman have demonstrated the there are advantages of having an integrated ferry service network with a degree of redundancy in capacity and capability. While a post event investigation will no doubt pick up on the detailed actions taken to overcome the loss, a number of strategic conclusions can now be reached which in turn should inform future decision making with regard to vessel replacement, infrastructure improvement, and service bundling arrangements, and indeed the content of the Draft Ferries Plan and related 30 years ferry strategy. Many of the major and smaller vessels in the CMAL fleet are interchangeable between routes offering the opportunity for vessels to be cascaded to cover failures elsewhere in the network, yet there are a number of port access constraints which preclude optimum interchangeability between major vessels both in unplanned and planned operation of the network. It was also clear that no private vessels are available for commercial hire to provide support in such circumstances. From this it is reasonable to suggest that to ensure continuity of service for island communities a number of minimum requirements for ferry services should be met. Major vessels should be interchangeable between the routes serving the major island groups. A relief vessel compatible with major port infrastructure has to be available to minimise the impact of future vessel failure on the network, which irrespective of the quality of planned maintenance is an inevitable occurrence. The contract arrangements put in place by Government must have inbuilt demonstrable guarantees of flexibility of delivery which will allow redeployment of vessels across the network as part of the specification, and the evaluation of tenders should take account of any resultant cost implications in the consideration of alternative bids and network bundling arrangements, over the tender period.

In this context it is understood that Government have recently proposed the commencement on a single new vessel to run on the Stornoway Ullapool route, which is to be larger than the current MV Isle of Lewis. The recommendation to proceed with this vessel was made following completion of a STAG study by MVA for CMAL into the options for providing an effective service between the ports. It would be of interest to all Stakeholders to have sight of the final report from the study in order that they might best understand the reasoning for the proposal and in particular how the issues of compatibility with the rest of the fleet and ports, and the limited capacity of the mustering area at Ullapool have been assessed within the options appraisal process.

In a parallel consultation being undertaken by Scottish Government 'Speak Up for Rural Scotland' it is stated 'Increasingly, our rural communities will shape our economy and quality of life for the whole nation in the 21<sup>st</sup> century. Our rural resources can help meet the food, energy and environmental challenges of the future'. Our Island and peninsular communities are a key element of rural communities and ongoing and increasing developments in the renewable energy, tourism, and quality food and drink sectors clearly demonstrate the need to provide high quality and flexible arrangements to meet their access needs and through this allow these communities to add significant value to Scotland's sustainable economic prosperity. The access needs for these communities in the future will vary with changing demands as they have in the past. These cannot easily be estimated at any point in time and it is therefore important that the approach taken to the provision of ferry services at this time is flexible in nature and can adjust to changing circumstances as these develop.

The Consultation seeks answers to 33 specific Questions and HITRANS has prepared its response to these reflecting discussion around the issues by Board Members, Permanent Advisors, and number of key stakeholders at a Workshop on the afternoon of Thursday 2 September, and a subsequent meeting of Ferry Users Groups reflecting the interests of users of the Clyde and Hebrides ferry services.

The HITRANS Answers to the Questions raised in the Consultation document are included as an Addendum to this response.

Finally, HITRANS and its constituent Councils would welcome the opportunity to engage further with Government in the advancement of the long term review of how ferry services in Scotland should be delivered and developed to the benefit of our communities, and to Scotland as a whole,

I trust you find value in this response,



Duncan MacIntyre  
Chair of HITRANS

## INFORMATION ON YOUR INVITATION TO RESPOND

### CONSULTATION ON SCOTTISH FERRIES REVIEW

#### Responding to this consultation paper

We are inviting written responses to this consultation paper by **30 September 2010**.

**Please send your response with the completed Respondent Information Form to:**

[scottishferriesreview@scotland.gsi.gov.uk](mailto:scottishferriesreview@scotland.gsi.gov.uk)

Or

Scottish Ferries Review Consultation  
Ferries Division  
2nd Floor North  
Victoria Quay  
Edinburgh  
EH6 6QQ.

If you have any queries contact Colin Grieve on 0131 244 1539.

We would be grateful if you could clearly indicate in your response which questions or parts of the consultation paper you are responding to as this will aid our analysis of the responses received.

This consultation, and all other Scottish Government consultation exercises, can be viewed online on the consultation web pages of the Scottish Government website at <http://www.scotland.gov.uk/consultations>.

The Scottish Government now has an email alert system for consultations (**SEconsult**: <http://www.scotland.gov.uk/consultations/seconsult.aspx>). This system allows stakeholder individuals and organisations to register and receive a weekly email containing details of all new consultations (including web links). SEconsult complements, but in no way replaces SG distribution lists, and is designed to allow stakeholders to keep up to date with all SG consultation activity, and therefore be alerted at the earliest opportunity to those of most interest. We would encourage you to register.

#### Handling your response

We need to know how you wish your response to be handled and, in particular, whether you are happy for your response to be made public. Please complete and return the Respondent Information Form which forms part of the consultation questionnaire as this will ensure that we treat your response appropriately. If you ask for your response not to be published we will regard it as confidential, and we will treat it accordingly.

All respondents should be aware that the Scottish Government are subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

### **Next steps in the process**

Where respondents have given permission for their response to be made public and after we have checked that they contain no potentially defamatory material, responses will be made available to the public in the Scottish Government Library (see the attached Respondent Information Form). Responses will be made available to the public in the Scottish Government Library by 28 October 2010 and on the [Scottish Government consultation](#) web pages by 4 November 2010. You can make arrangements to view responses by contacting the SG Library on 0131 244 4552. Responses can be copied and sent to you, but a charge may be made for this service.

What happens next?

Following the closing date, all responses will be analysed and considered along with any other available evidence to help us reach a decision on a Draft Ferries Plan. We aim to issue a report on this consultation process by end of 2010. In conjunction with this a Draft Ferries Plan will be prepared for a period of further consultation.

Comments and complaints

If you have any comments about how this consultation exercise has been conducted, please send them to:

Scottish Ferries Review Consultation  
Ferries Division  
2nd Floor North  
Victoria Quay  
Edinburgh  
EH6 6QQ.

E-mail: [scottishferriesreview@scotland.gsi.gov.uk](mailto:scottishferriesreview@scotland.gsi.gov.uk)

**RESPONDENT INFORMATION FORM: SCOTTISH FERRIES REVIEW**

Please note that this form **must** be completed and returned with your response to ensure that we handle your response appropriately. Thank you for your help.

Name/Organisation: The Highlands and Islands Transport Partnership (HITRANS)

Postal Address: Building 25, Inverness Airport, Inverness

Post Code IV2 7JB

Phone number 01667 460464

Email address info@hitrans.org.uk

3. Are you responding: (please check one box)

(a) As an individual  go to Q3a (b) On behalf of a group/organisation  go to Q3c

**INDIVIDUALS**

3a. Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government Website)?

Yes  No

3b. Where confidentiality is not requested, we will make your response available to the public on the following basis (please check one of the following boxes)

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name or address

or

Yes, make my response and name available, but not my address

**ON BEHALF OF GROUPS OR ORGANISATIONS:**

3c. The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government website). Are you content for your response to be made available?

Yes  No

3d. We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes  No

**THE SCOTTISH GOVERNMENT CONSULTATION PROCESS**

Consultation is an essential and important aspect of Scottish Government working methods. Given the wide-ranging areas of work of the Scottish Government, there are many varied types of consultation. However, in general, Scottish Government consultation exercises aim to provide opportunities for all those who wish to express their opinions on a proposed area of work to do so in ways which will inform and enhance that work.

The Scottish Government encourages consultation that is thorough, effective and appropriate to the issue under consideration and the nature of the target audience.

Consultation exercises take account of a wide range of factors, and no two exercises are likely to be the same.

Typically Scottish Government consultations involve a written paper inviting answers to specific questions or more general views about the material presented. Written papers are distributed to organisations and individuals with an interest in the issue, and they are also placed on the Scottish Government web site enabling a wider audience to access the paper and submit their responses<sup>1</sup>. Consultation exercises may also involve seeking views in a

<sup>1</sup> <http://www.scotland.gov.uk/consultations>

number of different ways, such as through public meetings, focus groups or questionnaire exercises. Copies of all the written responses received to a consultation exercise (except those where the individual or organisation requested confidentiality) are placed in the Scottish Government library at Saughton House, Edinburgh (K Spur, Saughton House, Broomhouse Drive, Edinburgh, EH11 3XD, telephone 0131 244 4565).

All Scottish Government consultation papers and related publications (eg, analysis of response reports) can be accessed at: [Scottish Government consultations](http://www.scotland.gov.uk/consultations) (<http://www.scotland.gov.uk/consultations>)

The views and suggestions detailed in consultation responses are analysed and used as part of the decision making process, along with a range of other available information and evidence. Depending on the nature of the consultation exercise the responses received may:

- indicate the need for policy development or review
- inform the development of a particular policy
- help decisions to be made between alternative policy proposals
- be used to finalise legislation before it is implemented

Final decisions on the issues under consideration will also take account of a range of other factors, including other available information and research evidence.

**While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process, consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.**



## Appendix 2: Consultation Questionnaire



# The Scottish Government Riaghaltas na h-Alba

## Scottish Ferries Review: Public Consultation 2010 Questionnaire

This questionnaire should be read in conjunction with the Scottish Ferries Review Consultation Document. Copies of the Consultation Document will be available at consultation events throughout Scotland in summer 2010. The Consultation Document, its appendices and this questionnaire can be downloaded from the Scottish Government website at:

<http://www.scotland.gov.uk/Consultations/Current>.

Consultation responses may be emailed to:

[scottishferriesreview@scotland.gsi.gov.uk](mailto:scottishferriesreview@scotland.gsi.gov.uk)

or posted to:

*Scottish Ferries Review Consultation*

*Ferries Division*

*Transport Directorate*

*Scottish Government*

*Area 2F Dockside*

*Victoria Quay*

*Edinburgh EH6 6QQ*

If you have any questions about this form or would like to speak to a member of the consultation team, please telephone 0131-244-1539.

Some of the questions are aimed at ferry operators. **You do not have to answer every question. If you do not wish to express a view please move on to the next question.** Your time in completing the questionnaire is very much appreciated. Your opinion will help us design your future ferry services.

Scottish Ferries Review Public Consultation 2010 Questionnaire

Preliminary Question: We know that different communities across Scotland often view their ferry services very differently, sometimes for reasons which are specific to the local area. If you would like to enter your postcode in the box below, that will help us to make the best use of the information you provide to us in this questionnaire.

Postcode:	
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Consultation Question 1: Do you agree that a change is required, to improve consistency in provision and secure funding for the future?

Yes  No

**Comments:**

Appropriate and secure levels of funding are necessary to provide effective and sustainable ferry services to the communities served. This has not been provided consistently in the past and positive changes are necessary to safeguard the social and economic future of our ferry dependent communities.

Consultation Question 2: Do you think that harbours should be self funded through harbour dues or do you think the current system of funding improvements through grants should continue?

self-funded  funded through grants

**Comments:**

Some degree of control of the level of harbour dues is needed in a market where there is no competition. This will ensure harbour authorities act in the best interests of all their customers. Without a grant application approval system for infrastructure investment harbour authorities could decide on the nature and scale of works to be undertaken and simply pass the cost on to the ferry passenger through the ferry operator.

If a scheme could be established that required harbour authorities to obtain approval from the party overseeing the ferry service for their expenditure, then it is sensible that the cost of the works should be passed on directly to the service funder. Either way the Government will have to meet a substantial part of the cost, and revenues will continue to be generated through fares to off-set some of this. The approach should be consistent with that applied to investment in the rail network.

It is however reasonable to expect routine maintenance costs to be funded through revenue with an element of self funding.

Consultation Question 3: How much of the funding should come from the users of the service?

**Comments:**

The proportion of funding from users of ferry services should be comparable to the system adopted for investment in road infrastructure. This would recognise the nature of a ferry as the primary means of access to the community served. Therefore this should be reflected by travel by ferry being less than that which would be incurred in travel by optional modes like air and rail in other parts of Scotland. Therefore users of the service should not be expected to pay any more than they currently do.

Consultation Question 4: Do you agree that we should test the market by tendering some routes on a single basis with the option for the operator to bring their own vessel(s)?

Yes  No

**Comments:**

Publicly supported ferry services should be provided at least possible cost to Government while maintaining the guarantee of service provision in the event of a failure of the operator or infrastructure.

Government should if minded to trial single route tendering, adopt a tendering system that demonstrates best overall value is achieved in minimising the cost of delivery of all the ferry services by removing any single or group of routes from the 'bundle'. Experience in Europe has shown that where an Operator has been required to bring their own vessels the subsequent tendering rounds have not attracted competitive pricing and the market strongly favours the incumbent supplier to the detriment of best value to the public sector in the long term.

Were Operators to be allowed to bring their own vessels, in order to provide surety of service for communities, Government should as a minimum requirement build into contracts the right for the client to retain the vessels for use on the route or routes until the end of the contract period in the event of default by the Operator for any reason, including going into receivership. If such surety cannot be obtained then those Operators should not be allowed to bring their own vessels or could be disqualified from tendering.

The issue that should be considered is whether single route tendering is correct at all or whether tenders should be invited for a range of options with a view to achieving best value.

Consultation Question 5: Do you agree that the following routes are the correct routes to consider tendering as single routes?

Ardrossan - Brodick	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Wemyss Bay - Rothesay	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Oban - Craginure	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Largs - Cumbrae	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Pentland Firth	Yes <input type="checkbox"/>	No <input type="checkbox"/>

**Comments:**

The condition of any route being tendered separately should be that it, as part of the overall tendering exercise, receives a guarantee of service provision and that the overall network of services is procured at lowest cost to Government. The market would thus decide which services should be procured under a single service or reduced bundle arrangement.

Consultation Question 6: .....Should we allow single routes to be tendered as a bundle or should we stagger the tenders?

allow a bundle  x stagger the tenders

**Comments:**

See responses to Question 4 and 5.

Tenders should not be staggered as advantage in later tender rounds could be gained by Operators successful in the initial rounds as a result of increased scale factors giving them

an unreasonable advantage and potentially facilitating uneconomic pricing in later contracts which would inevitably result in increased costs overall.

Consultation Question 7: Should the remaining routes stay within 2 bundles?

Yes  No

**Comments:**

The bundle approach is a sensible option to consider and there is no clear overlap between the existing two. However there should be flexibility included within each bundle to provide the option of improving the services or indeed adding new routes to respond to changes in social and economic conditions and reacting to opportunities.

Best value might be achieved by a single bundle or indeed by having more than the two bundles. These options should be explored and the option that delivers the most cost effective and highest quality arrangement should be selected.

The application of a public service obligation approach should ensure a minimum service level is provided to each route.

Consultation Question 8: Should we consider the implications of a looser tender, where a minimum level of service is required but where the operator has flexibility to innovate and reduce costs where they see fit?

Yes  No

**Comments:**

The form of tender should be one that ensures that a minimum standard is provided that guarantees frequency, journey time and quality of ferry services and that our ferry services integrate with other modes. The services should be customer focused and affordable. Any innovation proposed by a prospective operator that adds value should be encouraged.

Consultation Question 9: Should we specify climate change objectives within the tender and require the operator to specify how he intends to meet them? Do operators agree and have views on how emission reductions should be defined? How would they measure and monitor performance, and demonstrate delivery?

**Comments:**

In terms of delivery of the services and shore operations, the operators should be set maximum carbon usage targets within the contract based on a set percentage of the existing overall carbon usage levels incurred within the current contract. A financial incentive could be included to encourage operators to improve performance beyond this target, and a charge levied if the target is not met. The incentive for good performance should be set at a level relative to other performance targets that continues to provide a disincentive for the operator to fail to meet timetable commitments.

Consultation Question 10: What else do you think should be specified in a tender document? E.g. accessibility requirements, integration requirements etc.

**Comments:**

The contract document should clearly specify the nature of the service to be provided in terms of timetable, frequency, integration, accessibility, customer service, and safety. The needs of freight carriage, livestock, perishable goods and hazardous goods must clearly be considered.

In terms of accessibility the requirements for effective access of all user groups should be defined. Clearly facilities for access for those with limited mobility are a priority, but in addition improved access for foot passengers with luggage should be considered a priority. On larger vessels (not the overnight services where this already happens) consideration should be given to providing separate luggage transfer facilities equivalent to the service provided to air passengers.

In terms of integration existing timetables have generally evolved to provide an appropriate balance of integration with other modes taking into account the needs of users who choose not to use public transport for onward travel. In the coach/bus sector it is not always possible to ensure all links are provided due to commercial pressures and the need to make other connections on the route. The performance regime applied to the ferry service contract should not conflict with that in place for other modes. It is important that all modes work together to provide the best possible service to passengers.

Consultation Question 11: What should be the rationale for, and purpose of, the fares policy?

**PLEASE TICK ONE BOX ONLY**

- (a) Fairness of fares across Scotland
- (b) Community sustainability
- (c) Supporting economic development
- (d) Supporting tourism
- (e) Supporting the particular need of the particular community
- (f) Reduce the cost to government
- (g) To manage demand on ferries i.e. a policy that encourages people to travel at different times
- (h) To support "low carbon" travel
- (i) Other

**Comments:**

A single answer to this question is not appropriate but the highest priority in the delivery of ferry services has to be to support the Government's primary aim of sustainable economic growth and cohesion for all of Scotland. Fares, service timings, journey time, and frequency are critical aspects of ferry services that will constrain or promote economic development.

Consultation Question 12: ..... To what extent should fares differentiate between islanders/residents of peninsular communities and other ferry users?

**Comments:**

In growing the economy of our islands it is important to offer fair fares to all. The RET pilot

project in the Western Isles has shown that lower ferry fares can have a dramatic impact in increasing the propensity to travel by locals but also to remove a barrier for tourists to travel to the islands. This should also realise a reduction in the cost of taking goods to the islands.

We do recognise that the success of RET has resulted in some challenges in terms of the infrastructure (both ferry capacity and within the islands) in the pilot area but many of these may be resolved if the system became a permanent feature. There may need to be consideration for some differentiation in pricing policy between residents and other ferry users to take account of this.

Consultation Question 13: Should there be one fares policy across all of the supported Scottish ferry routes or should there be a different fares policy dependant on the need(s) of the community?

one fares policy

different fares policies

**Comments:**

There should be a consistent approach to fare setting and the RET pilot formula is at least easy to understand and consistent. However there may need to be some variation in pricing to recognise the different challenges and opportunities that each ferry service provides. This is particularly the case for very long and very short crossings.

The current approach to concessionary fares is an unfair two tier system that discriminates against island residents who do not have free travel on their primary mode (the ferry) in contrast to residents of other parts of Scotland who have unlimited free bus travel across the country (except to the islands).

Consultation Question 14: Do you agree that there should be a consistent and fair way of deciding what ferry services should be funded?

Yes  x

No

**Comments:**

Necessary and equitable funding of ferry services is required with a long term commitment to funding services and infrastructure. This will allow services to be managed and delivered in an optimal manner taking into account whole life costs of delivering ferry services to communities.

The criteria for provision of supported ferry services to communities should be agreed and become a statutory commitment providing the communities served with a surety of future accessibility.

Consultation Question 15: Do you agree that the ferry service should be designed to meet the most important needs of the community?

Yes  x

No

**Comments:**

The service should meet the reasonable needs of the community to reflect the lifeline nature of the service. Distinguishing between the needs, both current and future, to define what is important could be a very difficult process.

Consultation Question 16: Is our assessment correct for your community? Please tell us what your community needs are and whether our assessment is right.

**Comments:**

N/A

Consultation Question 17: Do you agree that investment should be prioritised to those areas that have the most potential to contribute to Scotland's growth?

Yes  No

**Comments:**

Investment has to be prioritised to ensure that core services are provided to all communities. If funding is available for service enhancement then this should be prioritised on the basis of the relative economic benefit it brings to the communities served and the country as a whole. Such assessments must however be contemporary and not based on historic preconceptions or data, as the Highlands and Islands have the resources and industries that will potentially lead Scotland's economic recovery, something that has not been reflected in previous transportation prioritisation exercises undertaken by Government.

Consultation Question 18: Do you think that the responsibility for ferries provision should be more consistent across Scotland?

Yes  No

**Comments:**

The responsibility for the provision of ferry services and related infrastructure across Scotland currently lacks consistency and is the result of historic events rather than best practice. A more consistent approach is essential.

Consultation Question 19: Do you agree that it would be wrong for all ferry services to be the responsibility of the Scottish Government?

Yes  No

**Comments:**

Scottish Government has a vital role in funding lifeline ferry services across Scotland and the provision of ferry services should principally be their responsibility. The delivery of these services should be organised by means which ensure a consistent level of service but with the flexibility to reflect the needs of local communities and facilitate their integration with other services.

Consultation Question 20: Do you agree that the Scottish Government should become responsible for all ferry services providing necessary transport links for island communities to access the mainland and Local Authorities or Regional Transport Partnerships should be responsible for the provision of all others?.

Yes  No

**Comments:**

All ferry services should ultimately be the responsibility of the Scottish Government. This provides the best guarantee for future funding and consistent service provision to all Scotland's ferry dependent communities.

There may be an opportunity for the Scottish Government to devolve some roles to local authorities/RTPs for reasons of subsidiarity. Any such step would require further discussion and debate to ensure that the arrangements were fit for purpose and supported by the communities served.

Consultation Question 21: ...Question 20 assumes that where an island is attached to the mainland via a bridge, it is treated as the mainland. Do you agree this is the correct way forward?

Yes  No

**Comments:**

On first appearance the suggestion of treating an island as mainland when it is attached to the mainland via a bridge seems a reasonable approach.

However when considering the implications we are concerned that what would follow if this approach was applied to ferry service responsibility is that routes such as Mallaig to Armadale, Sound of Barra or Gourock to Dunoon would fall under the remit of Local Authorities or RTPs while at the same time routes such as Seil to Luing would be a Scottish Government responsibility.

This simplistic approach does not recognise the nature and scale of operations and the geographical and strategic importance of the ferry service which must be the main consideration in determining who is responsible for their delivery

Consultation Question 22: Do you agree that the provision of ferry services would be better placed within the remit of Local Government?

Yes  No

**Comments:**



Ring fencing of funds to guarantee the provision of lifeline ferry services would be difficult under the terms of the concordat between the Scottish Government and Councils. Such a system would not provide surety for communities served under current funding mechanisms for Councils. There is however no reason that Councils and/or RTPs could not manage these services for Government under Service Level Agreement structures.

Consultation Question 23: Do you agree that Regional Transport Partnerships could play a key role in the procurement of ferry services?

Yes  No

**Comments:**

See response to Q22 above

Consultation Question 24: How should the responsibility be split between Local Authorities and Regional Transport Partnerships?

**Comments:**

The decision as to split between RTPs and Councils should relate to the agreement by Government on which services should be managed by organisations other than Government. For a relatively small network within individual Council areas the skills and experience necessary to manage the services could not economically be provided by the Council and there may be merit in the RTP taking on this combined remit optimising service delivery across Council boundaries if this approach was the preferred way forward for the communities served and provided funding was secured at an appropriate level.

Consultation Question 25: Do you agree that the provision of ferry services should continue to be split between central and local government?

Yes  No

**Comments:**

As discussed in the response to Q18 and 19 a split of operational delivery mechanisms between central and local Government would have merit, but funding for all lifeline services and infrastructure should ultimately be the responsibility of the Scottish Government.

Consultation Question 26: If a continuation of a mixed responsibility role is preferable going forward (i.e. responsibility continues to be split between Central and Local Government), how should the split be determined?

**Comments:**

See answers to Q 18 and 19 above

Consultation Question 27: Should there be a central provision of procurement expertise? For example, Local Authorities/RTPS could determine what services/vessels

they wanted to provide and specify those services/vessels, with a central procurement team purchasing them on their behalf.

Yes  No

**Comments:**

A common procurement team for delivery of all services and supply of vessels would be advantageous providing they were independent and directly accountable to the organisation responsible for specifying the service.

Consultation Question 28:

(a) Do you think that recommendations A – G (see below) should be implemented now?

Yes  No

**Comments:**

All the recommendations should be implemented.

(b) When tendering do you think these recommendations should be included in any future tender requirements?

Yes  No

**Comments:**

(c) Are there any of these recommendations that you consider to be of particular importance?

A. The design of new ferries and harbour/ shore infrastructure should take full account of the DPTAC guidance, for example the provision of handrails, ramps and assistance telephones. Consideration where possible should also be given to their use in smaller ferries and ports.

B. The need for regular, recognised disability awareness training is viewed as a relatively cheap and quick solution in helping to reduce many of the barriers faced Good customer care and assistance by staff is often viewed as the key factor when deciding if ferry travel is possible, practicable or comfortable.

C. Port and ship operators need to plan their communication and information dissemination to take full recognition of PRMs. Audio, visual or other disabilities need to be considered, especially when considering passenger safety.

D. Accessibility information should be readily accessible to PRMs in order to aid journey planning. Where possible websites should be improved to take recognition of the needs of PRMs and make it easier to access this information.

E. Disabled Persons Assistance policies should be developed by all ferry and port operators as a matter of best practice.

F. A policy for those passengers which may require additional assistance which fall outside the general categorisation of PRM, for example people travelling with small children, or heavy / awkward luggage or baggage should be encouraged.

G. Provision where appropriate of some form of left luggage facility which would aid those passengers that are waiting onward travel connections.

**Comments:**

A to G should be minimum criteria and the needs for access of foot passengers which would benefit all groups of ferry users should be built into future service contracts from 2012 ensuring safe and convenient interchange between modes and ease of movement for PRMs and those with luggage and accessible access requirements particularly on gangways and on small ferry slips with significant gradient.

(d) Are there other issues that should be addressed?

**Comments:**

see comment above

Consultation Question 29:

(a) Do you think that an Accessibility Improvement Fund should be set up?

Yes

No

**Comments:**

A fund to improve overall accessibility for all ferry users with particular focus for those with mobility issues would be a worthwhile introduction by Government. This need not be ferry specific but might be better to cover all modes. Transport Scotland already have a fund in place for rail and this could be extended in scope. The limited funding currently available to ferry services should not be diverted to this fund and this will still be available to support improvements by the organisations responsible for delivery to ensure agreed and specified levels of accessibility for all users be developed, which will particularly benefit PRMs.

(b) How would this be funded?

**Comments:**

Funding should be provided by Government across all modes as part of its commitment to meeting the requirements of equalities and accessibility legislation.

(c) Who would administer this fund?

**Comments:**

The cross modal fund should be managed by Transport Scotland and directed to individual modes to ensure optimum access for all public transport users.

Consultation Question 30:

(a) Do you think that an information system indicating the degree of accessibility would be useful?

Yes  x                      No

**Comments:**

The proposal for an information system is certainly worthwhile.

A five star category system would be more easily appreciated by passengers who would be used to such a grading system from its use in the accommodation sector. This would give scope for accessibility levels to improve over time as an ongoing commitment results in better practice and investment.

The star rating system must clearly explain the level of accessibility denoted by each star category.

(b) Are there any particular aspects you would like to see considered?

**Comments:**

As identified above the issue of facilitating movement of luggage between terminals for bulky transfer would greatly improve the quality of service from a passenger perspective.

Consultation Question 31: ..... How could the reduction of CO<sub>2</sub> emissions from ferries be delivered to assist in meeting the potential emissions reductions set out in the Climate Change Delivery Plan?

**Comments:**

The Climate Change Delivery Plan must look at all transport modes to identify how transport can contribute to the Government's carbon reduction targets. Ferry services can and should play their part in this and in specifying service levels the Government can affect this. Government can set targets for carbon reduction in particular areas within service operating contracts and failure to meet targets could attract penalties. The same type of system could be adopted in the rail service contract. Similarly financial incentives could be included to encourage operators who achieve a better level of environmental performance than the minimum standard. Other aspects of the service performance regime such as operating reliability would guard against operators taking advantage of carbon reduction incentives and failing to operate services to meet the carbon reduction target.

In accepting that ferry services can and should play a part in the delivery of the Climate Change Delivery Plan this can best be achieved through more innovative environmentally friendly vessel design.

The carbon reduction agenda should not lead to longer journey times and timetabling. It is also important to look at whole life carbon costs.

Consultation Question 32: ..... Operators would be likely to appreciate the fuel-efficiency benefits of such a measure. Would operators be willing to implement such a measure on a voluntary basis? If not, can they provide suggestions for alternate methods of delivering emissions reductions?

**Comments:**

Given the priorities set in the National Transport Strategy and the negative economic impact that increased journey times would generate, any change in strategy which results in increased journey times in transport as a whole should not be considered unless the full economic impact of such change is quantified and accepted by Government in the first instance but more importantly by the communities served.

If this is to be the case the same system would need to be adopted for other modes of transport to provide a consistent approach. Any change should impact as much on intercity rail services in the central belt as upon ferry services between remote island communities and their service centres.

Consultation Question 33: Would passengers support longer journey times as part of a CO<sub>2</sub> emissions reduction programme? If not, can they provide suggestions for alternate methods of delivering CO<sub>2</sub> reductions from ferries?

Yes

No

**Comments:**

More efficient propulsion, hull design, and choice of fuel type offer the potential for significant improvements in ferry fuel efficiency. Scotland could lead the world in the development of this technology.

Many of the islands served are likely over the next 20 to 30 years to achieve a surplus of renewable energy, developing technology to use this carbon neutral energy source to fuel ferries is an obvious way of enhancing the sustainability of island communities.

The renewable energy generation of the Highlands and Islands could be viewed as off-setting the region's carbon output.