

ARGYLL FERRY USER GROUP RESPONSE TO DRAFT FERRIES PLAN CONSULTATION

GENERAL

The Argyll 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 Argyll 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 Argyll 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 Argyll 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 Argyll 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 Argyll 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 Argyll 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 Argyll 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 Argyll 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 Argyll 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 Argyll 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 Argyll 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 Argyll 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 Argyll Ferry User Group and it agrees 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 Argyll 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 Argyll 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 Argyll 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 Argyll 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 Argyll 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 Argyll 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 Argyll Ferry User Group.

The move towards more fuel-efficient vessels and the incorporation of alternative and renewable energy technology is welcomed by the Argyll 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?

Argyll 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.

The Argyll Ferry User Group welcome the proposal to introduce a second ferry to increase capacity on the Ardrossan to Brodick service. However we believe this improvement should be made on the basis of the needs of this route and should not impact upon the Claonaig to Lochranza service. The Claonaig to Lochranza service is 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 and is recognised as a trading route between Arran and Kintyre.

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 Argyll 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.

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 Argyll Ferry User Group welcome the proposal to upgrade the Craignure to Oban service to a two vessel service. It is our opinion that had STAG been in place when the MV Isle of Mull was constructed the socio economic impact of a 2 vessel service would have been recognised and we believe this proposal is the correct level of service for this route. The additional capacity will be welcome particularly should the introduction of RET result in significant additional demand for travel on this route.

The Argyll Ferry User Group has discussed the recent problems with the Craignure Passenger Access System. Passenger access to ferries must be responsibly managed and any proposal to change ownership of existing Passenger Access Systems from CMAL (where historically such systems have been provided by the provider of the vessel) must be subject to agreement of all concerned and we welcome the positive dialogue that CMAL and Argyll and Bute Council are holding on this issue. We hope a swift conclusion can be reached on this discussion and that provision will be made to ensure a fit for purpose Passenger Access System is provided at Craignure.

The Argyll 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 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 timings 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.

Iona

Our proposal is for an additional 90 minutes of services in the evening, so the last service is around 8 pm.

This proposal would involve the provision of overnight berthing facilities. Given that significant funding is likely to be required this is a medium to longer term solution.

Q12. The community is asked for their views on this proposal.

Argyll Ferry User Group welcome the proposal to extend services to Iona. For the sake of consistency though we wish to highlight that Iona does not have a direct ferry service to the mainland. As such the concession proposed for Jura residents when travelling to the mainland should also be offered to Iona residents.

Lismore

Our proposal is to replace the two existing services with a single passenger and vehicle service between Port Appin and Point.

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

Q14. The community is asked for their views on this proposal.

The Argyll Ferry User Group welcome the proposal to replace the two existing Lismore services with a single passenger and vehicle service between Port Appin and Point. If such a service is to be established the Scottish Government must provide funding to upgrade ferry terminal facilities at both ports and the local road infrastructure will need to be upgraded as part of this project. The Draft Plan does not indicate the vessel that will be made available to deliver this crossing.

Coll and Tiree

Our proposal is, subject to other proposals going forward, to improve the current service so that it operates for at least six days per week during the winter period.

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

Q15. The community is asked for their views on this proposal.

Argyll Ferry User Group welcome the commitment to work towards an improved winter service for Coll and Tiree.

Argyll Ferry User Group would wish to have our concerns noted on the withdrawal of RET for commercial vehicles on the Coll and Tiree service. It is appreciated that the Draft Plan proposes an enhanced pre-RET "discount" scheme to replace, to some extent, RET for commercial vehicles. The Draft Plan has no detail on such a scheme and the wording of the document does not suggest a "discount" scheme will be guaranteed on any basis, although subsequent Government announcements have provided additional, much-needed, detail of proposed fare structures to be implemented on 1 April 2012.

Kerrera, Luining and Easdale Island

Our initial findings suggest that these services are fit for purpose and meet most of the communities' needs.

The Kerrera ferry service is currently commercially run, whilst the Luining and Easdale services are currently provided by the Local Authority. 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 Scottish Government. Also, for commercially run services we will consider intervening where there is market failure and the service is considered to be lifeline.

Q16. The community is asked for their views.

Argyll Ferry User Group find the conclusion puzzling that the ferry services to Kerrera, Luining and Easdale are fit for purpose and meet their communities' needs. There is little to explain the basis of this conclusion in the document.

Kerrera currently has a privately operated vehicular ferry service to the south of the island and a water taxi service between Oban and the marina at the north of the island. Both services are significant to the community they serve and should be included in the Ferries Plan. We ask that the vehicular ferry service in particular be recognised as a lifeline service which is subject to the commitment by the Scottish Government that the future of such services will be guaranteed.

The ferry service to Luining has been a subject of much discussion. What is not in doubt is that access to Luining service will require significant investment in the near future. The Argyll Ferry User Group support the calls from residents of Luining that the ferry service be replaced by a fixed link. The Ferries Plan should recognise this desire as a minimum it should note that the ferry and

infrastructure on this route already require significant investment. The existing ferry is approaching its 40th year in service.

A fixed link may be appropriate for Easdale also. The final Ferries Plan should recognise the lifeline nature of the ferry service to Easdale.

Southern Hebrides

Islay & Jura

Our proposals are:

- To offer no cost fares on the current service between Islay and Jura, when this journey is part of an onward journey to the mainland.
- To run more services from Port Askaig and fewer services from Port Ellen than was the case before the suspension of services from Port Ellen.
- The service between Islay and Jura is currently provided by Argyll and Bute 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.
- Running more services out of Port Askaig will become effective when the works are complete at Port Ellen.

Q22. The community is asked for their views on these proposals.

Argyll Ferry User Group believe the ferry service to Islay now meets the needs of the community. It is our opinion that the two ferry service is essential for the Islay – Kennacraig route to accommodate peak season tourist demand and the significant demands for haulage capacity to service the expanding Islay whisky industry. We can expect demand for Islay services to continue to grow with the introduction of RET and the two vessel service will allow the growing demand for access to and from Islay to be serviced.

If increased peak season fares are considered for the Islay route measures must be put in place to ensure that residents and frequent travellers are exempt from any such increase.

The Scottish Government should consider offering discounted travel on off peak journeys where capacity is available. Such discounts may be attractive to hauliers and coach tour companies.

With regard to the proposal to route the majority of services to Port Askaig, it is the considered opinion of the Ferry User Group that services to Port Ellen are important. There should be at least enough sailings from Port Ellen that would enable foot passengers to leave from this port in the morning and return there on the last sailing to the island. This will allow foot passengers to leave their car at the port and pick it up on their return journey.

Argyll Ferry User Group welcome the proposal to offer no cost fares on the current service between Islay and Jura, when this journey is part of an onward journey to the mainland.

Colonsay

Our proposals are:

- An additional sailing day in the summer;
- At least one day per week where there is a return sailing between Colonsay and the mainland; We may be able to achieve this change during the next CHFS contract (2013-2019).
- A commitment in the longer-term to work towards more sailing days during the winter if (and when) other vessels are released across a reconfigured network or when CHFS is re-tendered in 2013.

Q23. The community is asked for their views on these proposals.

Argyll Ferry User Group support the proposals to extend the summer and winter sailing days to Colonsay. The proposals for at least one day per week where there is a return sailing between the island and mainland, if realised, will greatly benefit islands residents.

Gigha

Our proposal is to extend the operating day in the evening by construction of an appropriate overnight berthing facility.

Given that significant funding is likely to be required this is a medium-to longer-term solution.

Q24. The community is asked for their views on this proposal.

The Argyll Ferry User Group are pleased that the Draft Ferries Plan includes the proposal to extend the Gigha service operating day in the evening by construction of an appropriate overnight berthing facility. We note that funding for this infrastructure improvement is likely to be required in the medium to long term. It would be welcome to see more detail on the timescale in which this improvement is to be secured included in the Final Ferries Plan. The Final Ferries Plan should also confirm how this improvement is to be funded.

The Argyll Ferry User Group were advised by Argyll and Bute Council of the calls from Gigha residents for a change to the terms of use of 10 journey tickets to allow multiple passengers and vehicles to use each ticket book. This could be operated on a system of nominated vehicles / passengers which would prevent misuse but would make the multi journey tickets much more useful for residents and regular travellers.

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 Argyll 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 Argyll 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.

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.

Western Isles

Our proposals are:

- The principal route for Harris and Lewis is the Ullapool-Stornoway route. Tarbert-Uig is the secondary route.
- The principal route for the Uists and Benbecula is Lochmaddy-Uig. Lochboisdale-Oban is the secondary route.
- Barra has only one direct route to the mainland, Castlebay-Oban;
- There is a need for all principal and secondary routes to be retained because of the distance between the ports; the population around the secondary routes and the need to ensure adequate exit ports for resilience purposes;
- Barra is the only landmass in the Western Isles which does not currently receive a service that meets the community's needs in terms of service profile. (Their current winter service is 3 days per week and ideally we want to provide at least five days);
- We think the secondary route (Lochboisdale-Oban) for the Uists and Benbecula should also be retained for the reasons given above ;
- We think the secondary route (Tarbert-Uig) for Lewis and Harris should also be retained for the reasons given above;
- We have considered options for improving the service to Barra. However, there are no viable cost effective options available without affecting the other Western Isles services. Within the Western Isles the Barra service will be given priority for funding in the future.

Our hope would be that improvements to Barra's winter service to the mainland could be achieved during the next CHFS contract (2013-2019).

Q26. The community is asked for their views on these proposals.

Argyll Ferry User Group are supportive of the proposals to retain the Lochboisdale to Oban route for the Uists and the priority being given to the Barra to Oban service for future funding.

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