



HITRANS RESPONSE TO DRAFT FERRIES PLAN CONSULTATION

GENERAL

The Highlands and Islands Transport Partnership (HITRANS) welcome the opportunity to comment on the Draft Ferries Plan that was published by Transport Scotland on 21st December 2011.

Ferry services are of primary importance to the sustainability and future prospects of the Highlands and Islands. Approximately 80% of the ferry services considered in the Scottish Ferries Review operate either wholly or partly within the HITRANS area. The Draft Ferries Plan as the latest output from the Scottish Ferries Review process has been eagerly anticipated by HITRANS.

To help inform the HITRANS response to this consultation a workshop session was held with the Partnership Board and Advisors early in the process where the Draft Plan was looked at in some detail. Following this session a round of Ferry User Group meetings were held throughout the HITRANS area so we could take on board the opinion and thoughts of each community served by ferries across the Highlands and Islands. The Ferry User Group meetings will also generate individual responses to the Draft Plan Consultation.

HITRANS are pleased by the recognition shown through the Draft Ferries Plan of the crucial role the ferry services have in enabling our island and peninsular communities to contribute to Scotland's sustainable economic growth. The social and economic benefits that can accrue from investing in our ferry services are significant. Reduced fares, improved service frequency and new vessel capacity have all shown huge positive benefits in the past and we welcome the range of improvements that are identified throughout the Draft Ferries Plan.

Our response to the route specific questions detailed in the Consultation paper is produced at the end of this document as Appendix A. This response draws on the feedback we gathered through the ferry user group meetings held in March 2012 to help shape our opinion.

KEY ISSUES

There are three fundamental objectives that the Ferries Plan must support and achieve:

1. **Support economic development:** The quality of ferry service provision can make or break any of the islands' economies. Services must support business and industry, tourism and the service industries.
2. **Support sustainable population and communities:** A sustainable population is needed, in terms of either maintaining current population or growing numbers, and achieving a balanced demographic profile. Strategic ferry services should be provided to help address the core of this issue, and help to tackle barriers to social inclusion.
3. **Promote integration with other transport modes, and with other policies:** It is vital that the development of ferry services be pursued in the context of national and regional strategies and policies for transport, and issues such as planning, housing, tourism, education, and health and social care.

FUNDING

HITRANS are pleased that the Draft Ferries Plan reiterates the Scottish Government's commitment to improving ferry services to island and peninsular communities and the recognition of the central role ferry services play in allowing these communities to contribute to the National Purpose of achieving sustainable economic growth across all of Scotland.

The Draft Ferries Plan sets out the economic picture in which decisions on public expenditure are being taken in Scotland today and for the short and medium term future. Clearly this places affordability and impact as a central consideration in public spending and this applies equally to ferry services as for other areas of expenditure. 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 service changes is yet to be agreed. The Final Ferries Plan should aim to address questions regarding the affordability and feasibility of the improvements proposed in the Draft Ferries Plan. HITRANS is of the view that an element of STAG appraisal of the route specific enhancements for each route will demonstrate the high socio economic benefit that investment in our ferry services will bring to the wider Scottish economy.

HITRANS welcome the recognition within the Draft Ferries Plan of the urgent need to plan the replacement of a large proportion of the Clyde and Hebrides fleet. We would also seek greater recognition of the need to support replacement of the internal Orkney ferries. The need for urgent investment in ferry services has grown in recent decades when other areas of Government transport spending have been given priority while investment in new vessels has been neglected. We welcome the fact that CMAL are investigating ways of raising finance that can address this urgent issue. 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, with reimbursement being achieved through on-going ferry operator payments. This is a pragmatic and affordable mechanism that could be useful in supporting fleet investment across the network.

The work to address the urgent need to replace a large proportion of the fleet servicing the CHFS and the routes currently provided by local authorities (notably Argyll and Bute Council and Orkney Islands Council / Orkney Ferries) provides an opportunity to build vessels that may allow sustainable services to be operated by smaller crews. If this approach is to be developed further job losses must be minimised and there should be a commitment to no compulsory redundancies. Instead the reduced overall crew complement should be achieved through natural staff turnover / retirement. In reconfiguring ships the opportunity to increase the emphasis on shore based crewing should be investigated. This would potentially reduce vessel construction costs and increase the numbers of ferry crew members who reside in and become active members of our island and peninsular communities. This would in turn help social and community cohesiveness and sustainability.

With regard to responsibilities associated with ports and harbours, HITRANS notes the Government's proposals to explore what would be involved if central Government, 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.

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

across the network by the provider of the vessel) to a local authority or port authority must be subject to the agreement of all concerned. The current arrangements have evolved over many years and reflect the need for ferry operators to take appropriate action to ensure their vessels can accommodate safe passenger access and egress at all ports of potential use. Such arrangements could be further challenged if single route operators bring their own vessels to any service which are in turn non compatible with access provision elsewhere in the network.

The Draft Ferries Plan does not appear to consider the opportunity and benefits that fixed links could bring to communities if bridges and causeways were to replace ferry services. The Final Ferries Plan should address this gap. Strategic fixed links make a wider contribution beyond replacing the ferry service to a single island. They can act as catalysts for improvements to other transport services in an area. Several of the crossings may be candidates for comprehensive project appraisals to assess if replacement of ferry services with fixed links is feasible. HITRANS response to the route specific questions (Appendix A) includes reference to specific examples where strategic fixed links may offer a cost effective alternative in the long term to the existing ferry service.

RESPONSIBILITY FOR PROVIDING FERRY SERVICES

The Draft Ferries Plan does a good job of summarising the lack of consistency across Scotland with regard to the split of responsibilities for the provision of ferry services. Ultimately the provision of lifeline ferry services in Scotland and the development and implementation of a national policy framework for Scotland's ferry services should be the responsibility of the Scottish Government. HITRANS are very pleased that the Scottish Government has confirmed that the Government is prepared to take responsibility for any ferry service and will act as provider of last resort in the event of a service being lost.

As with the transfer of infrastructure responsibility from local authority to the Scottish Government HITRANS believe any such change should, as is suggested in the Draft Plan, be subject to agreement between both parties concerned.

CONTRACT LENGTH AND BUNDLING

HITRANS wholeheartedly agree to the Government's suggestion that contract periods longer than the maximum six-year period recommended by EU procurement legislation would be beneficial. We support the Government's exploration with the European Commission of the possibility of offering longer contract periods for the next CHFS tender and for future NI tenders.

Other EU member states already operate ferry services on the basis of much longer contract periods than six years with the aim of achieving best value. We absolutely support moves to bring Scottish ferries in sync with best practice in delivering lifeline ferry services in other parts of Europe.

HITRANS believe that the bundling of ferry services within the Clyde and Hebrides Ferry Services (CHFS) and Northern Isles Ferry Service contract currently in place is correct. The Draft Ferries Plan is unclear whether there is any intention on the part of Transport Scotland to remove any routes from the contract bundle although reference is made to relaxing the contract requirements of future CHFS and NI tenders. Any future tendering arrangement should be such as to deliver a robust and sustainable ferry network capable of meeting the current and future needs of communities at least overall cost to Government. The section in the Draft Plan on the Mallaig to Armadale ferry also implies that this route may be tendered separately as a summer service. If this is not the intention then it would be good to see this clarified in the Final Ferries Plan.

HITRANS recommend the contract period for the Clyde and Hebrides Ferry Service Contract and the Northern Isles Ferry Service Contract should be a minimum of 10 years.

BOOKING MANAGEMENT

Concerns have been raised through the Ferry User Group process that ferry vehicle bookings may be shown as unavailable through the on line booking system when in reality ferries sail with significant levels of spare deck capacity. It has never been clear why this happens. The Outer Hebrides Tourist Industry Association (OHTIA) and Comhairle Nan Eilean Siar have undertaken some monitoring of online booking systems for CHFS routes. HITRANS analysed the data produced by OHTIA for 2011 summer season booking on the Stornoway – Ullapool service. This analysis identified that the online booking system could be reviewed to improve occupancy. There may also be value in reviewing the impact and arrangements for commercial vehicle block bookings and late cancellations for car bookings. HITRANS would support any improvements to the booking system to ensure online booking was effective and that the use of vehicle capacity of CHFS and NI contract services is as efficient as possible. We recognise that there are no easy or quick answer to achieving this aim and that new measures will take time to be implemented and require open consultation with stakeholders.

FARES

HITRANS welcome the intention set out in the Draft Ferries Plan to provide a single over-arching fares framework instead of route-specific fare setting. The way fares are currently set is unnecessarily complicated and no longer fit-for purpose.

Research undertaken by Fisher Associates on behalf of HITRANS in 2004 highlighted that high fares were a disincentive to travel by ferry. The introduction of RET in the Western Isles has shown the hugely positive economic and social impact that a consistent approach that delivers good value fares can bring to our island and peninsular communities. HITRANS welcome the commitment that the Scottish Government have made to extend the RET approach to all the CHFS and Northern Isles routes. In delivering this commitment we believe that the one size fits all model may not however be appropriate. The formula that has been applied to RET in the Western Isles has been fit for purpose, although in the case of the ferry services from Oban to Barra, Lochboisdale, Coll and Tiree this required a very sensible adjustment that pegged the single fares as the equivalent of one portion of the 6 journey book of tickets. We believe that for RET to be rolled out to all routes in the CHFS and NI ferry service contracts Transport Scotland should investigate the feasibility of establishing three RET formulas for implementation on the following basis:

- The RET formula developed for the Western Isles Pilot Project - For medium distance routes
- A new but related formula to be applied to short sea crossings.
- A new but related formula to be applied to longer sea crossings.

Community representatives at Ferry User Group meetings have expressed strong concerns over Government's proposal to increase fares by 6.5% per annum on non RET routes until such time as RET is implemented. HITRANS agree that this will have an unfair impact on these communities and in particular to those where RET introduction may not happen before 2016 and ask Government to consider accelerating the introduction of RET for all island communities so that the benefits of this fair and consistent system of charging are enjoyed by all the communities served by the CHFS and Northern Isles ferry service contracts.

HITRANS understand that concerns have been expressed by business and community representatives on the impact that will be caused by the withdrawal of RET for commercial vehicles particularly on the routes where RET has already been introduced. 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.

It is not clear from the draft plan if the Scottish Government intend to implement RET to replace route-specific fare-setting within inter-island ferry services currently operated by local authorities. Clarification is therefore sought as to whether the Government will provide financial support to adopt such a fare structure for Council run ferry services. It would also be useful if the Final Ferries Plan could clarify how the Government would see RET being rolled out to benefit passengers on routes currently provided on a commercial basis.

Dynamic pricing can lead to price discrimination without adequate safeguards. Each community served by ferry is a “captive market” and whilst there may be flexibility in when certain journeys are undertaken, the communities must be protected from any operator charging excessive premiums. The fare established through the RET fare structure should therefore be the maximum applied for any journey. HITRANS are keen to understand better how the Government intend to balance the simplicity and fairness of RET with any element of demand management and we would be happy to engage with Scottish Government further on this.

The value of multiple journey ticketing products should not be lost in any moves towards RET. Tickets such as the Island Hopscotch and Island Rover are useful for marketing routes and services. We believe that an opportunity will still exist for the products that are already available and for new products to be introduced. For example discussion at Ferry User Group meetings has identified demand for a Rover ticket to be available for a shorter period of time with one suggestion being a 3 day Rover ticket.

The Draft Ferries Plan re-affirms the Government’s commitment to the National Concessionary Fare Scheme that affords free travel on buses throughout Scotland. HITRANS welcomes this commitment and feel that the Scheme could be extended to offer fairer treatment of ferry passengers reflecting a ferry’s part function as equivalent to a bus. Across Scotland there is a combination of local ferry services and Mainland ferry services. The former connect typically smaller isles to their nearest service centre, for example, the connections between the isles in Orkney and the Orkney Mainland. The Mainland connections tend to connect larger community centres to Scottish Mainland. At present, the national concessionary travel scheme only applies to the connections to the Scottish Mainland, typically on services funded directly by the Scottish Government, with the entitlement being to up to two free return journeys per annum. Consideration should be given to extending this entitlement to cover all ferry services in Scotland, in recognition that ferry services provide an equivalent function to local bus services and long distance coach services. Such a change would provide the opportunity to unify the concessions that apply across ferry services, with the outcome that residents in all areas of Scotland with ferry services are afforded the same concessions, as is the case with bus/coach services. Different ferry services function for different reasons, ranging from local access to jobs, shopping, local healthcare etc., which will tend to generate a high frequency of travel, to connections which are made less frequently, perhaps 2-6 times per annum to visit friends and families, attend hospital, go on holiday etc. Clearly there is a need for further work in determining what would be an appropriate level and rate of concession for ferry services but the examples of what local authorities already provide are a useful starting point.

HITRANS are aware that ScotRail has agreed to introduce the Jobcentre Plus Travel Discount card onto its network from 1 April 2012. Eligible Jobcentre Plus claimants will be able to obtain a 50% discount on rail travel on ScotRail services within Scotland – excluding the cross-border Caledonian Sleeper. HITRANS support the introduction of the same type of scheme for ferry services operated under the CHFS and NI ferry service contract. Passenger capacity is rarely a constraint on our ferry services and we consider introducing such a scheme would be relatively straightforward and would offer significant extra help to jobseekers in Scotland.

HITRANS would be happy to work with Scottish Government and other stakeholders on developing the over arching framework that will underpin fares across Scotland's ferry networks. While the fares system in place today is often overcomplicated and inconsistent from one route to another we recognise the real benefits that introducing RET on routes to the Western Isles has brought to these fragile communities. It is also worth noting that fares revenue supports approximately a third of the operating costs of the Scottish Government ferry services and infrastructure. This compares favourably with Scotland's railways where fare box revenue currently only accounts for 26.9% of the total cost of funding Scotland's railways.

INTEGRATED TICKETING

While the Draft Ferries plan commits that future ferry service contracts will include encouragement for operators to participate in integrated ticketing schemes we believe this could go much further and make participation in any integrated ticketing projects a mandatory obligation on the contract operator. Strathclyde Partnership for Transport are at an advanced stage in developing a smart card integrated ticketing project for the SPT area and HITRANS believe this project should extend to cover the Clyde ferry services.

HITRANS and Orkney Islands Council have plans in place to develop a pilot project that will see smart card integrated ticketing and e-purse facilities introduced on internal ferries operated by Orkney Ferries Limited. This project is being developed as a joint initiative with support and guidance being provided by the Transport Scotland Integrated Ticketing team. It is our intention to ensure the project meets protocols including ITSO that will make it flexible to expand to other routes and transport modes.

The SPT smart card ticketing scheme in particular is at an advanced stage and could represent a useful launch pad for the introduction of smart card integrated ticketing across the CHFS, Northern Isles and Dunoon-Gourock contract networks.

The introduction of smart card integrated ticketing will require a roll out of smartcard ticketing infrastructure at ticket offices, ports and on vessels that comply with ITSO ticketing specifications. This will allow ferry passengers to enjoy similar travel benefits as other transport modes and the Oyster scheme in London has set a standard to which we must aspire. SPT and HITRANS have expressed a desire to work with Transport Scotland on this project and such a partnership approach could help identify external funding opportunities from sources such as ERDF and INTERREG to off-set some of the initial project costs.

MODAL INTEGRATION AND INFORMATION SYSTEMS

Integration with other transport modes should be recognised as a high priority in the Ferries Plan. It is good to see that the Draft Plan acknowledges the importance of integration but the Final Plan

should make stronger provision for this and the need to emphasise this in future CHFS and NI contracts.

Integration across the HITRANS area is compromised by the competing performance regimes of rail and ferries. It is in the passenger interest to ensure connections, yet we are aware of trains pulling out of Oban as a ferry arrives. Ardrossan Harbour has the same issue. As we move towards integrated and smart ticketing, seamlessness will be an expectation. Passengers also appreciate and should be provided with reasonable recompense in the event of significant delay.

Good integration between ferries and buses and trains will reduce dependence on cars for travel and in time we would hope to see greater utilisation of the large passenger capacity of our ferries as more people make their journey without the car. Integration is not just about the physical connections between ferries and bus / train services. Good information systems are really important to ensure passengers are aware of the different journey opportunities. Three initiatives that are being delivered by HITRANS in partnership with others are detailed below. These projects will all help encourage more people to travel to and from our ferry services by public transport and help relieve capacity constraints for vehicular traffic.

- i. Smart Phone Apps – HITRANS has worked with Traveline Scotland, Transport Scotland and SPT to support the development of a suite of smart phone apps that offer real time journey planning information that can be downloaded free of charge on 95% of the smart phones in use in the UK. The apps offer a range of services including ferry times and bus stop information with GPS positioning for the nearest available transport stops, live eye camera access to provide information on road conditions and travel disruption alerts.
- ii. TransTourism – The TransTourism project is a Northern Periphery INTERREG IVB project which aims to tackle 2 key priorities. These are – a) to promote innovation and competitiveness in remote and peripheral areas. b) Sustainable development of natural and community resources. In the Highlands and Islands, HITRANS has developed a project that consists of web-based timetables and itineraries to enable the visitor to browse at home and then commit to a public transport based trip in the Highlands and Islands, as part of a multi-national bid. This project aims to relieve the constraints of current Highlands and Islands tourism/travel sites being either mode specific or simply very patchy in the information given on the opportunity to travel by public transport for a full multi-modal trip. Comprehensive single mode timetables do not facilitate the creation of individually tailored itineraries taking in attractions/locations of choice, and are often too detailed for the visitors needs. The portal provided as an output from the project would build and exploit existing data resources and introduce the opportunity for user feedback on trips to be generated within the content.
- iii. Real Time Information – HITRANS and our local authority partners have been implementing real time information systems on bus services that connect with a number of ferry services. A recent development that HITRANS is seeking to introduce is the display of onward travel information for public transport connections at ferry terminals and on board ferries. A pilot project to display bus, coach and rail information for onward travel from Oban is about to be tested with the introduction of a real time information display on MV Isle of Mull.

The three projects detailed above illustrate work that HITRANS are engaged on that is designed to improve ease of access to travel information both for pre trip planning and for passengers already on the move. HITRANS are keen to work with Scottish Government and the ferry operators on delivering best practice on integration and information. To achieve this end we believe the Final Ferries Plan should include a commitment to emphasising through future CHFS and NI ferry service contracts the importance in participating in schemes such as those detailed in i), ii) and iii) above.

ACCESSIBILITY

HITRANS welcome 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”. HITRANS also welcome 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.

The proposal in the Draft Ferries Plan for the introduction of an “Accessibility Information System” is a commonsense development that will help sign post the accessibility of our ferry services. The 2010 consultation on the Scottish Ferries Review outlined the form the related Information System is likely to take. The Final Ferries Plan should include more information on this. It is crucial that input should be sought from organisations such as the Mobility Access Committee for Scotland (MACS) and RNIB to ensure the System is fit for purpose and has wide support.

It is suggested that compliance with equalities and accessibility legislation should be seen as an absolute minimum level of provision. HITRANS 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”. HITRANS welcomes this as a proposal but would like to understand better what form this Fund will take and who will administer it.

With regard to the Western Isles, a particular concern has been the lack of safe, convenient, efficient and economical baggage handling facilities for all ferry services to and from the Western Isles. The recent discontinuation of such a facility by Citylink on the Stornoway-Ullapool service has met with much concern and opposition from passengers. Establishing baggage handling facilities across the network is something that should be treated as a priority in terms of promoting equality of usage and possibly something such a fund could support?

PASSENGER RIGHTS AND A FERRIES REGULATOR

The Scottish Government tasked the Regional Transport Partnerships to put in place arrangements to provide consultative mechanisms between the operator, users and public agencies for the ferry network serving the Clyde, Hebrides, and Northern Isles. The first line of consultation is between island groups and the ferry operator. The arrangements are now well established and the Ferry User Groups meet at least twice per annum with additional meetings for key issues such as the Draft Ferries Plan consultation. There are six ferry user groups. These are:

- Clyde (Arran Bute, Cumbrae and Cowal including Kilcreggan)
- Argyll (Mull, Iona, Lismore, Coll and Tiree, Barra and South Uist, Colonsay, Islay and Gigha)
- Hebrides (Barra, the Uists, Lewis and Harris)
- Raasay, Skye and the Small Isles, Ardnamurchan and Mull
- Orkney
- Shetland

The Ferry User Groups have developed in the time that has passed since their inception. HITRANS are keen to see these groups continue to improve and we are open to suggestions on developing the Groups.

In July 2010 the European Parliament approved new rules (Regulation (EU) No 1177/2010) that will reimburse or reroute ferry passengers if a ferry is more than 90 minutes late. The purpose of the legislation is to ensure the same high level of protection is available to passengers travelling by maritime and inland waterway transport that is comparable with other modes of transport. This aims to ensure full account is taken of consumer protection in general.

The regulation states that disability may not be used as a reason for denying a passenger the right to board. Free assistance must be provided to disabled people in ports, on condition that the carrier or the port operator is notified when the reservation is made or at least 48 hours before boarding. This will also apply to cruise passengers.

Ferry passengers suffering significant delays will be entitled to compensation of 25% of the ticket price, rising to 50% for long delays. If delays mean a passenger has to spend the night in a hotel, the ferry operator will have to pay for hotel and meals.

HITRANS welcomes the strengthening of consumer protection regulations for ferry passengers. This legislation by the European Parliament and Commission is important and it would be useful if the Final Ferries Plan included detail on how this Regulation is to be implemented for ferry passengers in Scotland. HITRANS, the Highlands and Islands Local Authorities and the Ferry User Groups can offer valuable input in how these regulations should be implemented and would be happy to work with Government on the detail of this.

In consulting with as wide a range of stakeholders as possible in preparing our response HITRANS has received representations from the NHS that AEDs (automated external defibrillator) should be introduced as part of the medical equipment available on CHFS and NI ferry services. HITRANS support the suggestion that consideration be given to introducing an AED (automated external defibrillator) on all ferries that operate routes with a longer journey time between ports of 90 minutes.

The Draft Ferries Plan states that the Scottish Government intends to explore what legislative provision would be involved in setting up a Ferries Regulator. It is suggested that the Ferries Regulator could regulate the pricing and provision of services of ferries not provided for under contract to the Scottish Government or other public body. HITRANS can see merit in the establishment of a Ferries Regulator however we have concerns about how such a person or body would operate and how much influence they would have over commercial services. Instead of moving straight to the establishment of a Ferries Regulator we believe there needs to be a proper consultation on this proposal to establish that such a body would add value and have a strong enough remit to be successful.

ENVIRONMENTAL ISSUES

HITRANS shares the Scottish Government's aspirations for 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. HITRANS 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. HITRANS 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 HITRANS.

The move towards more fuel-efficient vessels and the incorporation of alternative and renewable energy technology is welcomed by HITRANS. 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 and increased service frequency to be achieved.

HITRANS would support operating changes that would allow hauliers to drop trailers on vehicle decks where this can be achieved without adverse effects on the overall service. This would offer environmental benefits by reducing the overall weight of each articulated commercial load that travels on a sailing by removing the weight of the tractor unit.

APPENDIX A – ROUTES AND SERVICES PROPOSALS BY COMMUNITY

HITRANS welcomes the work undertaken by Government to establish the development of a routes and services methodology. HITRANS has welcomed being involved in supporting the Government’s assessment of ferry services. We are concerned however that the output from this exercise as it relates to the Orkney internal ferry network does not form part of the draft ferry plan. Without inclusion of such an assessment, HITRANS believes the Government will not be in a position to conclude if the services meet the needs of these communities. HITRANS shares Orkney Islands Council’s concern that given the overall financial pressures, Orkney’s internal ferry network may be perceived as a lower priority. HITRANS would therefore urge the Government to complete a needs based assessment for the internal network and would be happy to help facilitate this if desired.

Question 7: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to Arran

A two ferry service on the Ardrossan/Brodick route is an enhancement that HITRANS support. While this route is not in the HITRANS area it is covered by the Clyde Ferry User Group that HITRANS provide secretariat support to.

The introduction of new vessels on this route will have some impact on other CHFS operations particularly within the Clyde Ferry User Group area. It would be good to see consideration given in the new vessel design for this route on the ability of the vessels to be used on other routes which will be a useful opportunity in the event of emergency fleet redeployment and annual overhaul / maintenance.

It is important to ensure that any replacement vessel/s is fit for purpose i.e. designed and fitted to meet the sea conditions which prevail in the lower Firth of Clyde and in crossing currents without discomfort to passengers. It is also necessary that such vessels are sufficiently powered to negotiate berthing at exposed west of Scotland mainland ports. In seriously adverse weather a contingent mainland port is essential.

The Lochranza/ Claonaig/Tarbert service is designated in the Draft Plan as a secondary route but it is seen as a vital link within the west of Scotland ferry network as it directly links North Ayrshire with Argyll & Bute. It is a part of the “Hopscotch” tourist route and has recently formed part of the Whisky Trail linking distilleries in Arran and Islay. This service carries dangerous goods unlike the MV Caledonian Isles and is recognised as a trading route between Arran and Kintyre. Tarbert, the winter port for this service is not mentioned in the Review. Tarbert is an all weather port. Currently the winter service makes only one sailing each way between Tarbert and Lochranza being part of the Portavadie / Tarbert service and one return journey each way in winter is requested.

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

Question 8: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to Bute.

HITRANS 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 Colintrave to midnight. This is due to the remoteness of the mainland port at Colintrave 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 we ask that the priority for any investment on incremental timetable improvements be focussed on the primary route from Rothesay to Weymss Bay. HITRANS 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.

Through the Clyde Ferry User Group HITRANS have been made aware of the concerns raised by Bute Community Council about the proposals to stagger the roll-out of RET. The Scottish government have expressed a commitment to roll out the RET pilot to Islay, Colonsay and Gigha from October 2012 and Arran from October 2014 however, no date is specified for the other Clyde Islands. The result of this will be cheaper fares to certain islands whilst prices on routes to Bute could continue to rise in the region of 6.5% per annum until RET is introduced. This will disadvantage local residents and businesses and will also make Bute less attractive to tourists who are vital to the local economy. It is therefore requested that the Scottish Government avoid staggering the roll-out of RET to avoid disadvantaging communities such as Bute.

On shorter ferry crossings such as those to the Clyde Islands RET could have a negligible impact on fares. Many low income families and frequent ferry users currently rely on multi-journey tickets and could therefore be disadvantaged if these are replaced by RET. We therefore ask that consideration be given to the development of a new RET formula that is more tailored to shorter crossings in addition to a formula for medium distance routes (the current RET formula) and another formula be developed for longer sailings.

Question 10: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to the Cowal Peninsula and Dunoon.

As regards the Dunoon–Gourock service, the Scottish Government has set out a commitment to providing a ferry service that meets the needs of users and to do so they will focus on the 3 point plan agreed at the meeting held on 9th December 2011 in Dunoon. HITRANS takes this opportunity to welcome the commitment of the Cabinet Secretary for Infrastructure and Capital Investment to progressing this matter and clarifying the elements of the 3 point plan which were agreed by all attending December’s meeting:

Immediate Action:- The development of an improvement plan by Argyll Ferries to significantly improve the current service. The intention would be that, through the Scottish Government, Argyll and Bute Council, Inverclyde Council and the Ferries Users Group would be given the opportunity to comment on the improvement plan. Then, a confidential options appraisal exercise should take place, led by Scottish Government officials and supported by Argyll and Bute Council and Inverclyde Council (and CMAL where appropriate) as follows;

Short to Medium Term options:- A short to medium term options appraisal process would look at options to improve the current service and travelling experience for the public in the short to medium term. This process will examine options for improving the current service provided by the Argyll Flyer and the Alicat, the potential utilisation of the Coruisk on the Dunoon-Gourock route, improvements in embarkation / disembarkation arrangements, which will include the provision of berthing pontoons and shore side passenger accommodation infrastructure, and any other potential short to medium term proposals which parties consider appropriate for consideration. This process would require options to be developed which should be examined in terms of technical and operational feasibility, deliverability and cost. The target timescale for this would be April but will be dependent upon the Project & Resource Plan developed by the Scottish Government's Ferries Division.

Medium to Longer Term options:- A confidential options appraisal process would look at options for the provision of a vehicular ferry service operating between Dunoon & Gourock . This process would look at all potential options which would include the existing service model, the provision of new vessels designed specifically for the Dunoon-Gourock route by the Scottish Government, the procurement or lease of suitable vehicular ferry vessels available within the shipping industry, and the scope to develop an operating model which could allow a private sector operator to provide a vehicular ferry service on this route. The timescale and resources required to undertake this options appraisal will be identified by the Scottish Government's Ferries Division, with a target date to develop a Project Inception Document which will set out the Project & Resource Plan.

Question 11: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to Mull and Ardnamurchan/Morvern.

HITRANS welcome the proposals to upgrade the Craignure to Oban service with two-vessels and an extended operating day.

HITRANS understand that Argyll and Bute Council has restated its position that the Passenger Access System (PAS) at Craignure is not a Council asset and is not therefore the Council's responsibility to maintain, upgrade or replace. They are however supportive of progressing discussions with CMAL and the Scottish Government to determine an approach that is agreeable to all parties. Any upgraded or amended PAS must be suitable to accommodate future vessels which may become available to increase capacity on the Oban – Craignure route.

HITRANS consider that both the Fishnish to Lochaline and Tobermory to Kilchoan services are important to sustain local communities/businesses and these alternative routes also provide additional capacity/resilience on the network. Both ferry services are important routes as part of the Gaelic Rings and school children also use these services to commute to school which avoids the requirement for pupils to stay in hostels through the week.

Kilchoan to Tobermory becomes a 70 mile round trip if the vehicular ferry service is removed and Lochaline to Oban is also a 70+ mile round trip via the Corran narrows. The proposals to replace the current vehicular service with a passenger only service on the Kilchoan – Tobermory route would potentially have a huge impact to the local communities/businesses who rely on the vehicular service. The price of this service has been identified as a barrier to travel and, as such, fares could be reviewed to try and increase vehicular patronage.

HITRANS believe that both Tobermory to Kilchoan and Lochaline to Fishnish should be retained as vehicular ferry services on their current basis.

Question 12: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to Iona.

HITRANS welcome the proposals to extend services to Iona and the suggestion that this can be achieved through the provision of a new overnight berthing facility. The Scottish Government should confirm if direct capital funding will be provided for these works or if they are agreeable to additional berthing charges at Iona and Fionnphort being levied upon Cal Mac's operation to cover prudential borrowing costs that would be incurred by Argyll and Bute Council should they be required to fund the new facility.

It is also considered that residents of Iona do not benefit from a direct ferry connection to the mainland and, as such, there will be an expectation that a similar subsidy is introduced as proposed for residents of Jura.

Question 13: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to Ardnamurchan / Morvern (the Corran Ferry).

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. HITRANS agree that this service can be considered a model service.

Question 14: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to Lismore.

HITRANS 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. HITRANS believe that to accommodate demand on the route a "Loch" class vessel will be required and the feasibility of cascading such a vessel from within the CMAL owned fleet should be considered a priority. To allow foot passengers to retain the access they currently enjoy to the centre of Oban it will be necessary to ensure a bus service links the ferry slipway at Port Appin with Oban town centre.

Question 15: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to Coll and Tiree.

HITRANS welcome the commitment to work towards an improved winter service for Coll and Tiree. Timetabling enhancements should be investigated and there may be value in considering undertaking a full STAG analysis on access to Coll and Tiree. The introduction of a two vessel service from Craignure to Oban may make a standalone service linking Coll and Tiree with Tobermory a proposition worthy of further consideration that would allow a daily service to be achieved.

HITRANS has been notified through the Argyll Ferry User Group of concerns by business and community representatives in Coll and Tiree of the impact that will be caused by 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.

The proposed significant investment in the Argyll Array offshore wind farm adjacent to Tiree could also have implications for ferry service provision in the second half of this decade and flexibility to respond to such change in demand for services to both Tiree and Islay should be built into the final Ferries Plan.

Question 16: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to Kerrera, Luing and Easdale Island.

HITRANS do not agree with the conclusion in the Draft Ferries Plan that the ferry services to Kerrera, Luing 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 Luing has been a subject of much discussion and it is clear from the full STAG undertaken by Argyll and Bute Council that it does not meet the needs of the community. It is not in doubt that the Luing service will require significant investment in the near future. HITRANS support the calls from residents of Luing that the ferry service be replaced by a fixed link, the least cost option being a causeway. The Ferries Plan should recognise this desire and as a minimum it should recognise that the ferry and infrastructure on this route already require significant and urgent 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.

Question 17: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to the Northern Isles.

HITRANS awaits the imminent announcement of the preferred bidder and contract details for the Northern Isles Ferry Services contract. It is HITRANS view that future ferry services to the Scottish Mainland should, as a minimum, provide a service comparable in standard with that provided by the current contract. The negotiated tendering process should provide potential Operators the opportunity and flexibility to propose and subsequently provide options which bring additional value to service users within the funding envelope available. This is particularly critical during the current period of development of marine renewable energy in the area during which time significant additional demands may be placed on the services provided. The Government's aim should through the procurement process be to seek improvements in service, address the already known constraints to support the social and economic prosperity of our community, and provide flexibility for growth when required.

The Government's commitment to retain a broadly similar level of service is therefore welcomed. HITRANS would request adequate consultation with the local communities and regional transport partnerships on any changes to services relative to current arrangements be facilitated prior to the acceptance of any new contract.

The draft plan notes the intention to produce a less prescriptive specification for the next Northern Isles Ferry Services Tender (2018) to encourage competition. It is anticipated that this will enable operators to be more innovative in their approach. HITRANS welcomes the opportunity to work closely with the Scottish Government and the Councils in producing a suitable methodology, dialogue and specification to outline the key requirements for the next Northern Isles Ferry Services contract. HITRANS therefore asks that a suitable period of engagement is facilitated with responsible authorities well in advance of the next tendering process.

HITRANS supports Orkney Islands Council's request that consideration is given to amending the start date of the Northern Isles Ferry Services contract due to commence in 2018. The commencement of the Northern Isles Ferry Services Contract during 2012 is in July which is during one of the busiest periods of operation. It is therefore suggested that a start date outwith peak season be put in place during 2018 and beyond in order to minimise the potential disruption to services.

Question 18: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to Skye.

It is not clear what is intended here for the Mallaig to Armadale ferry service. HITRANS do not believe any reduction in service level or quality on this route would be acceptable. There should be no reduction in capacity, frequency or timetable timings.

The Armadale to Mallaig service is a real success story which has shown the considerable benefits that can accrue from capital spend in transport projects. The investment by Scottish Government on the A830 Trunk Road Fort William to Mallaig, by the Highland Council on the A850 Broadford to Armadale road, improved ferry terminal facilities and the provision of the MV Coruisk have seen a major growth in the tourist industry and associated businesses along this route. This service should be viewed as an example of where the right investment in a ferry service can deliver a really positive return.

The Final Ferries Plan should seek to clarify exactly what is intended for the Armadale to Mallaig route. The suggestion of a no cost operation in the summer season implies de-bundling of this route is being considered and if so this is not an approach HITRANS would support.

Question 19: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to Raasay.

HITRANS recognise the good steps that have been taken to develop and improve the Raasay ferry service in recent years. We look forward to the new hybrid ferry that has been ordered for the Raasay to Sconser route coming into service in 2013 and agree that if the timetable can be adjusted and extended to better accommodate people commuting to mainland Skye this will assist sustainable living on Raasay.

Question 20: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to the Small Isles.

HITRANS welcome the proposal to amend 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 community cohesion and sustainability in the Small Isles. This enhanced ferry timetable

will be of benefit to tourists and visitors and encourage the tourist industry on the Small isles.

With regard to the proposal to investigate a two ferry operation we believe this will require further detailed investigation. 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.

Question 21: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to Knoydart.

Knoydart would benefit from additional sailings that would allow commuter travel from the peninsula to the mainland. 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 improvement of 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.

Question 22: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to Islay and Jura.

HITRANS 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. This confirms to output from the full STAG undertaken on the route prior to implementation of the two vessel service. 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 HITRANS that services to Port Ellen are important. The proposed significant investment in the offshore wind farm adjacent to Islay could also have implications for ferry service provision in the second half of this decade.

The current ferry service linking Jura and Islay is operated by ASP Ship Management on behalf of Argyll and Bute Council. The cost of this ferry service has been identified as a major concern for Jura residents and, as such, HITRANS welcome the proposal by the Scottish Government to offer no cost fares for residents of Jura on this route when their journey is part of an onward journey to the mainland. Whilst the no cost fares proposal is welcomed we believe that the Jura service should be considered as a priority among routes that could transfer from the Council to Scottish Government subject to the Council's agreement, and could therefore be included in the next CHFS tender. Further discussion will be required between Argyll and Bute Council and the Scottish Government regarding the potential transfer of this lifeline ferry.

Question 23: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to Colonsay.

HITRANS 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.

Future amendments to ferry timetables should also take account of the PSO scheduled air services to the island to ensure the broadest possible range of travel options for residents and visitors.

Question 24: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to Gigha.

HITRANS 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. We would welcome more detail on the timescale in which this improvement is to be secured be included in the Final Ferries Plan. The Final Ferries Plan should also confirm how this improvement is to be funded.

HITRANS through the Argyll Ferry User Group have been made aware of the calls from Gigha residents for a change to the terms of use of 10 journey tickets prior to the introduction of RET to allow multiple passengers and vehicles to use each ticket book. This could be operated on a system of a specific number of nominated vehicles / passengers which would prevent misuse but would make the multi journey tickets much more useful for residents and regular travellers.

Question 25: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to Kintyre.

HITRANS are pleased to see the commitment in the Draft Ferries Plan to retain the Tarbert to Portavadie ferry service. This route provides an alternative to the local road network and offers resilience in the event of trunk road closures such as those witnessed on the A83 in recent years due to landslides. It is also a popular route with tourists and is likely to benefit from increasing levels of patronage associated with the marina and holiday accommodation developments that have been constructed at Portavadie in recent years.

The Claonaig – Lochranza ferry service is vital to the local economy and should be retained. This provides connections between Argyll and Ayrshire and the Cal Mac ferry services operating from Kennacraig as well as connections between Kintyre and the Central Belt when there are closures on the A83 road network. In addition, this route is designated for transporting dangerous goods such as fertiliser, bottled gas etc onto Arran.

The proposals to introduce a vehicle ferry service between Kintyre and Ayrshire are welcomed and could be significant for Kintyre given the recent significant investments in renewable energy and local tourism infrastructure/hotels associated with golf and high value tourism. Further clarification is required from the Scottish Government regarding the proposed destination ports/frequency/crossing times etc and local businesses and residents in both Kintyre and Ayrshire should be consulted to ensure that maximum local benefit is realised from any future service.

Question 26: The Scottish Government request views regarding the proposals set out in the Draft Ferries Plan with regard to ferry services to the Western Isles.

The classification of primary and secondary routes on each of the ferry routes to the Western Isles should be reconsidered in the Final Ferries Plan. Whilst the Draft Plan sets out proposals which ensure the continuity of primary and secondary routes and services for the foreseeable future, any

discrimination between these lifeline services could, at a time when there are even greater financial pressures, result in those of a perceived lesser priority being subject to a greater risk of reduction and even discontinuation.

HITRANS welcome the recognition through the routes and services methodology that Barra does not receive an acceptable level of service. The proposal of increasing the number of sailings between Castlebay and Oban during winter months from three to five is welcome. HITRANS would welcome more detailed proposals on how this can be achieved and the timescale in which it could be delivered in the Final Ferries Plan.

Concerns have been expressed in the Western Isles on the withdrawal of RET for commercial vehicles. 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.

HITRANS believe that the success of RET in growing demand for travel to the Western Isles would indicate that other services will need to be improved as well to ensure that the demand for travel to the islands is met.

We are concerned that, some twelve months after CMAL’s consultation exercise regarding the replacement vessel for the MV Isle of Lewis, no formal announcement has been made by the Government confirming the award of a contract or contracts to procure the new vessel. The cessation of the MV Muirneag on the Stornoway-Ullapool crossing in October 2013 means that a replacement vessel or alternative passenger and freight ferry services of at least a similar standard must be in place by then. No such award has been made as yet and full details of the necessary measures ensuring continuity of service have not been identified or developed.

The recommendations of the research undertaken by Reference Economic Consultants for HITRANS in 2008 on the development of ferry services from Uig to the Western Isles should be explored and in particular the recommendations on how these services could be developed and enhanced should be investigated.

HITRANS recognises the calls that have been made by representatives of the South Uist community that a new route be introduced from Lochboisdale to Mallaig. The Final Ferries Plan should include for further consideration of the opportunity that exists to establish this new route.

The Sound of Harris service has been a real success and has provided (along with the Sound of Barra service) much greater cohesion within the Western Isles. The service is still limited in the winter by the restrictions imposed by the hours in which this service can operate. With new navigational aids and improved lighting HITRANS would be keen to see the hours of operation of this route extended in the winter timetable.