

HEBRIDES FERRY USER GROUP RESPONSE TO DRAFT FERRIES PLAN CONSULTATION

GENERAL

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

We are encouraged by the recognition by the Scottish Government that Scotland's island 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.

The provision of these "lifeline" services to the Western Isles makes a significant, if not wholly central, contribution to the well-being and longer-term sustainability of the islands and its communities. The economic and social potential of the islands can only be fully realised when quality, reliable and affordable ferry services are available for not only its residents and businesses but also those who wish to travel to and do business on the Western Isles.

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.

Notwithstanding the above concerns, the Hebrides Ferry User Group welcomes the opportunity to participate in the current consultation and looks forward to maintaining an effective and efficient working relationship with Scottish Government through this and futures stages of the implementation of the Plan.

FUNDING AND PROCUREMENT OF INFRASTRUCTURE

The Hebrides 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 Hebrides 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 be regarded as premature.

With regard to the procurement of new vessels, the Hebrides Ferry User Group is 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. The Hebrides Ferry User Group understands that 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 Hebrides Ferry User Group would wish to take this opportunity to reiterate the suggestion made at its meeting of November 2011 that the borrowing powers of either Comhairle Nan Eilean Siar or HITRANS 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 beginning with the Stornoway to Ullapool vessel replacement.

With regard to responsibilities associated with ports and harbours, the Hebrides 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.

In the Western Isles, the potentially affected ports would be those at:

- Leverburgh, Isle of Harris (Sound of Harris Ferry Service)
- Berneray, North Uist (Sound of Harris Ferry Service)
- Lochmaddy, North Uist (Lochmaddy-Tarbert-Uig Ferry Service)
- Ceann a'Gharraidh, Eriskay (Sound of Barra Ferry Service)
- Ardmhor, Isle of Barra (Sound of Barra Ferry Service)

These ports are owned and operated by the Comhairle to support the ferry services detailed above. The associated income through harbours fees and dues provides funding to ensure the effective and proper lifecycle maintenance of the infrastructure at each of these ports and, legitimately, makes a significant contribution to sustaining other, non-transportation, piers and harbours across the Western Isles which provide valuable facilities to other sectors such as fishing, aquaculture and leisure. Any transfer of responsibility for ports and harbours in the Western Isles must include the non ferry harbour infrastructure to ensure the marine economy of the Western Isles is safeguarded. If this would not be the case then the Hebrides Ferry User Group does not support any asset transfer.

Concerns have been raised by members of the Hebrides 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 Hebrides Ferry User Group would wish to express a strong desire to retain the current bundling of ferry services in the Clyde and Hebrides Ferry Services (CHFS) and would agree with the Government's suggestion that contract periods longer than the maximum six-year period permitted by EU procurement legislation would be beneficial. The Hebrides Ferry User Group therefore supports the Government's exploration of this possibility with the European Commission. We note that longer contracts for the provision of ferry services are already operated in other EU member states.

FARES

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

The intention to provide a single over-arching fares framework instead of route-specific fare setting is also noted. The Hebrides 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 Hebrides Ferry User Group welcomes the recognition that if fares are set too high it reduces travel, jeopardising the long-term sustainability of communities such as those in the Western Isles.

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

The Hebrides Ferry User Group wish to emphasise our support for the RET Scheme which has brought significant economic and social benefit to the Western Isles community. In general, it has been supported as both simple and fair and reducing the geographical disadvantage from which all island groups in Scotland suffer and the Hebrides Ferry User Group very much welcomes the confirmation in the Draft Plan that the Government proposes to secure the future of existing services in and to the islands through it being implemented on a permanent basis.

However, the Hebrides Ferry User Group would wish to have our concerns noted 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.

The implementation of the changes to commercial vehicle rates in the Western Isles will undoubtedly have a negative impact on not just the haulage sector, but on the Western Isles as a whole and appears to be completely at odds with all of the aims of the review of ferry services. The Hebrides Ferry User Group support the request of the Comhairle that the Government reinstate RET for commercial vehicles until the evaluation referred to in Transport Scotland's announcement of 13 February 2012 has been completed.

In addition, and in the absence of further detail on the scale of fares and the date for the implementation of RET on the Sound of Harris and Sound of Barra ferry services, the Hebrides Ferry User Group cannot support the discontinuation of multi-journey tickets on these crossings.

FERRY SERVICES

The classification of primary and secondary routes by the Scottish Government is of concern to the Hebrides Ferry User Group. 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.

It is of further concern to the Hebrides Ferry User Group that the outputs of the routes and services methodology suggest that Barra is the only landmass in the Western Isles that does not currently receive a service that meets the needs of the Community in terms of service profile. Whilst the recognition of the current shortcomings in ferry services to Barra are noted, it is felt that there remains considerable room for improvement in ferry services provided elsewhere to and in the islands.

The Hebrides Ferry User Group suggests the findings of the HITRANS research on the development of ferry services from Uig to the Western Isles be explored the recommendations on how these services could be developed and enhanced should be investigated.

The Hebrides Ferry User Group recognises the strong calls that have been made by representatives of the South Uist community that a new route be introduced from Lochboisdale to Mallaig. The Hebrides Ferry User Group support the introduction of this service and support the call for the service to be introduced as soon as possible. This could be achieved initially on a trial basis through better utilisation of the fleet.

The Draft Plan concludes that, on the basis of the associated needs-based assessment, the profile of ferry services for Barra is not satisfactory. The Hebrides Ferry User Group agrees with this conclusion. The proposal of increasing the number of sailings between Castlebay and Oban during winter months from three to five is welcome. The Group 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.

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 Hebrides Ferry User Group and it is agreed that the provision of “lifeline” services in Scotland and the development and implementation of a national policy framework should be the responsibility of the Government. All existing ferry services to and within the Western Isles are the responsibility of the Scottish Government and the Hebrides Ferry User Group do not believe this should change in the future.

ACCESSIBILITY

The Hebrides 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 Hebrides 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 Hebrides 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 Hebrides 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.

With regard to the Western Isles, a particular concern has been the lack of safe, efficient and economical baggage handling facilities for all ferry services to and in 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. Perhaps establishing baggage handling facilities across the network is something that a fund could support?

ENVIRONMENTAL ISSUES

The Hebrides 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 Hebrides 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 Hebrides Ferry User Group.

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

The Hebrides Ferry User Group would support operating changes that would allow hauliers to drop trailers on vehicle decks where this can be achieved. 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.