

Public Consultation for Islands Connectivity Plan - Strategic Approach Paper and Vessels and Ports Plan

Consultation Identifier Questions

Q1. Are you completing this on behalf of yourself or an organisation?

- Individual
 Organisation

Q2. If an organisation, please list below.

Local Authority – Argyll and Bute Council

Q3. What statement best describes your living situation?

- I live on the mainland the majority of the time
 I live on a Scottish island or peninsula the majority of the time

Q4. If you live on a Scottish island or peninsula, please comment below which one.

N/A

Q5. What age category are you in?

- Under 16s
 16 to 18
 19 to 21
 22 to 34
 35 to 44
 45 to 54
 55 to 59
 60 and over

Transport Scotland

Q6. Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?

- Yes, limited a lot
- Yes, limited a little
- No

Q7. What do you mainly use the ferry services for?

- For Business
- For Employment/Education
- For Personal/Leisure
- All of the above

Q8. How frequently do you use the ferry services?

- Never
- Occasionally
- Weekly
- Monthly
- Seasonally (Summer period)

Main Consultation Questions

Themes, Vision and Priorities

Transport Scotland has gathered feedback from previous workshops and consultations to identify priorities for the future of Island transport connectivity: ferry networks, supported by the integration with other transport services. This information has contributed to the development of themes, which are the focus for the Islands Connectivity Plan.

The following key themes emerged:

- Community voice and transparency
- Reliability and resilience
- Accessibility
- Timetables, unplanned and essential travel
- Integration of services
- Capacity and demand
- Freight
- Vessels and ports

Transport Scotland

- Low carbon and environmental impact
- Ferry fares
- Local authority services

Q9. Do you think these key themes capture the main aspects of transport connectivity for island and peninsula communities?

- Yes
 No

Please explain your answer.

Argyll and Bute Council's official response to the consultation document is based on the following key principles:

- Lifeline services are so critically important and expensive to retain sustainably it is inappropriate for Argyll and Bute Council to have the responsibility for the provision of any ferry services which operate to islands which are located within the Argyll and Bute geographical area. It is the preferred position of the Council not to operate any ferry services.
- Future ferry services that are to be delivered must be promoted on the basis that they are affordable, reliable, and sustainable and offer a high quality service that integrates with other transport links. These services must be flexible and the services must be able to respond to future demand and not only current demand e.g. changes in economy related to renewable energy and tourism etc and also meet the demands of changing demographics and socio-economic profile.
- Delivery of future ferry services across Scotland should be based around the ambition of sustainable economic development and reflect the government's objectives of promoting solidarity, cohesion and sustainability as promoted within the Scottish Government's own National Strategy for Economic Transformation.
- We welcome any potential to enhance local ferry and air services which currently provide lifeline connections to our island and peninsular communities. We would also note that whilst capital funding could help establish demand responsive transport services it will require revenue funding to make these services viable to operate. We would again stress that the majority of road and public transport infrastructure serving our rural, island and peripheral areas is owned and operated by local authorities and as such, by excluding local infrastructure and revenue funding from the previous STPR2, it is difficult to see how the proposed intervention will significantly improve rural accessibility over the lifetime of this plan.

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- Argyll and Bute Council, Orkney Council, Shetland Council, Comhairle nan Eilean Siar and Transport Scotland all have responsibility for financially subsidising PSO air service routes and airports; with each organisation carrying out its own individual procurement for the air services it has responsibility for. This lack of a joined up approach limits opportunity in terms of procurement savings, advertising, potential to stimulate competition and offer linkages not currently being met to ensure no islands are left behind. Argyll and Bute Council therefore would welcome an update on the Scottish Government's commitment to undertake a Scottish Air Services Review.
- The Council wish to unite with island community council's that recognition is given to air services across Scotland and the significantly important role they play in supporting fragile island communities as an integration with ferry services for island transport connectivity. We would also expect, similar to the commitment for the Scottish Ferry Services Review through the Islands Connectivity Plan, for a funding plan and programme for vessel deployment and services, that there will be a commitment following the aviation review to allocate a funding programme to improve integrated island transport connectivity.
- Transport Scotland have confirmed that their subsidised PSO air services from Glasgow to Barra and Tiree already face capacity issues, especially during the summer, and that stopping these services in Oban *'is not viable within existing capacity levels and our aircraft are fully utilised on the existing Glasgow to Campbeltown Tiree and Barra services. Any additional services would require additional aircraft capacity. If that was to be purchased by Transport Scotland it would cost £7M circa per aircraft'*. As these routes are at capacity this demonstrates the significant demand that exists to develop and support further new air routes. This is a further reason why there needs to be a national Scottish Air Services Review, similar to the Scottish Ferries Review and likewise with the Scottish Ferries Review when additional ferries are procured, additional aircraft should also be procured when capacity constraints are identified on the national air service network. This would be at a competitive capital price when comparing investment of new aircraft to the investment required for a new ferry.
- Funding, Fares and Subsidy – funding of transport infrastructure and services is a key barrier. Without adequate funding, we will see a continued contraction of rural public transport services.

Transport Scotland

- Investment must be prioritised to ensure that essential core services are provided to all communities. Life line services should be funded with clear identification of future needs. It is imperative that services are future proofed to allow the full economic potential to be realised over time.
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Based on feedback and discussions with key stakeholders and drawing on Scotland's National Transport Strategy 2 and the National Islands Plan, we have developed a draft vision and associated priorities for ferry services, supported by other transport services.

Draft Vision

Scotland's ferry services, supported by other transport services, will be safe, reliable, affordable and inclusive for residents, businesses and visitors enabling transport connectivity, sustainability and growth of island and peninsula communities and populations.

Draft Priorities

Priority 1: Reliable and Resilient

Reliable and resilient ferry services that meet the needs of communities and businesses and support the transition to a well-being economy which is fair, green and growing.

Priority 2: Accessible

Ferry services that are accessible and provide easy to use and affordable transport connectivity for all users.

Priority 3: Integrated

Ferry services that enable sustainable and active travel choices which support our health and well-being and make our Island and other ferry dependent communities great places to live, work and visit.

Transport Scotland

Priority 4: Low Carbon

Ferry services that take actions to reduce the negative environmental impact of their operations and help to achieve Scotland's net-zero targets.

Q10. Do you believe the draft vision captures the aspirations of island and peninsula communities for their future ferry services?

Yes

No

Please explain your answer.

The historical evolution of ferries has resulted in some ferries being subsidised and provided by local authorities. Argyll and Bute Council have subsidised ferry services to Jura, Luing, Lismore and Easdale for a significant number of years. This has a significant impact on the Council's finance and ultimately affects the other services the Council can deliver across Argyll and Bute within budget. This is especially significant during the current climate of economic difficulties where services are subject to reduction. Lifeline services are so critically important and expensive to retain sustainably it is inappropriate for Argyll and Bute Council to have the responsibility for the provision of any ferry services.

The Scottish Government is best placed to provide a consistent delivery to ferry provision. This approach would allow an overarching service standard and offer economies of scale.

Scotland's National Strategy for Economic Transformation sets out the significance of transport to rural areas highlighting policies to expand the rail network and improve accessibility of ferries and airports. As such, it is vital that the Scottish Government continue to invest in our key transport arteries that are so important to the future success of the region. The Council will continue to work in partnership with the Scottish Government, Transport Scotland, HITRANS, SPT and public transport operators to lobby for increased investment in our transport services so that these meet the diverse requirements of our local communities and businesses whilst also bringing vital tourism revenue to the local economy.

There are also regular ferry user groups and frequent consultation with island communities and also other bodies such as Regional Transport Partnerships such as Hitrans, SPT, COSLA, COHI and the Highlands and the Islands Regional Economic Partnership. More weight however needs to be given to the information gathered and opinions communicated through these groups to Government.

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Q11. Do you think the 4 draft priorities reflect what island and peninsula communities see for their future ferry services?

- Yes
 No

Please explain your answer.

Argyll and Bute is characterised by numerous peninsulas separated by deep sea lochs and includes 25 inhabited islands. It is important to retain flexibility to provide and sustain access and economic stability because of the essential and lifeline nature of ferry services.

The future economic needs of these remote communities should be identified to ensure that any increase in fares, to accumulate more funding from users, does not impact adversely on the economy. These types of economies are already fragile as they are susceptible to the impact that uncontrollable factors can have on the seasonal industries the majority rely on e.g. weather plays an important role in tourism, farming and fishing and can make or break a season.

There is a need for a consistent range of data on performance to be collected and communicated clearly to customers on a regular basis to identify island priorities. This communication needs to be transparent and easily understood. Customer satisfaction on individual routes should be a key metric and displayed on individual routes. Clear performance targets need to be established and where these are not reached, or a downward trend is recorded, actions need to be identified on how this will be improved or reversed linked to a clear timetable. This would then clearly identify island priorities.

Community Voice and Transparency

We acknowledge the importance of empowering community voice and transparency in communications. The current methods of engagement that are used by operators to inform communities are through email and webpage updates, with further communications shared through relevant Ferry Committees and Transport Forums.

Local authorities and Scottish Government/Transport Scotland use engagement methods such as through project reference groups, stakeholder groups and webpage updates.

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However, we have heard from communities that more can be done to take account of their views when it comes to decisions on ferry services and that there is a lack of clarity on how decisions are made.

Q12. Are there other ways of engaging with communities and stakeholders that would benefit decision making on ferry services, including vessels and ports projects?

- Yes
 No

Please explain your answer.

There are already ferry user groups and the opinions expressed in these groups need to be taken into account. Each ferry route has different user needs and pressures. Lifeline ferry services /networks must be reliable, high quality, affordable, flexible and futureproofed in order to meet the needs of our communities and enable growth in key local sectors (tourism, food and drink, agriculture, aquaculture, forestry and renewable energy). An uplift in economic activity is vital to reverse the trend of declining populations in some of our rural and island communities and improved transport and connectivity is essential for these communities to thrive. It is also essential that there is investment in local ferry and port infrastructure to ensure this is futureproofed to accommodate increased patronage generated by the predicted growth in tourism, local industries such as food and drink including aquaculture and whisky and general vehicle traffic due to initiatives such as RET.

More could be done to raise awareness of the Ferries Community Board across communities and that its primary purpose is be the voice of the communities and provide the community view to CalMAC. It should be better highlighted to ensure greater involvement of the communities for example, served by the Clyde and Hebrides Ferry Services over the duration of the new contract.

Communities should have a greater say in the development of timetables, it is important to involve a wide range of island representatives involved that have a number of different requirements and ambitions for their community. The business community for example, young people, and people in need of regular medical treatment off the island. There is also a need to recognise local strategic priorities. Argyll and Bute Council for example have a priority to increase our economically active population and develop our local economy. This is just as important for our islands as it is for our mainland communities. Improved transport connectivity is a top priority of our local people confirmed recently through CPP consultations and it is therefore

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considered essential for a successful community and economy. Timetables need to reflect this ambition.

It also has to be recognised by Government and residents alike that crew hours need to take account of rest regulations and are consequently an important factor restricting the expansion/flexibility of timetables, where a single extra sailing can result in a requirement for a whole additional crew to be employed which would not be cost effective. There is already synergy between local authorities and Regional Transport Partnerships as Local Authorities are members of Regional Transport Partnerships and Regional Transport Partnerships are answerable to Local Authorities. Argyll and Bute Council however feel that the responsibility of ferry service provision is of national importance. Scottish Government is therefore best placed to manage these services and ensure future ferry services meet community needs and are affordable, sustainable and flexible to respond to future demands. Delivery of future ferry services across Scotland should be based around the ambition of sustainable economic development and reflect the government's objectives of promoting solidarity, cohesion and sustainability as promoted within the Scotland's National Strategy for Economic Transformation.

Accessibility

We propose introducing an Accessibility Standard that would be in addition to the legal requirements and could act as guidance for all ferry services. This is to ensure that our ferry services, vessels and ports are easy to use for all, while recognising that people have different needs and capabilities.

The Standard could include standards such as inclusive and disability training to be carried out frequently and an accessibility review carried out periodically on ferry services, ports and vessels.

Q13. Do you think an Accessibility Standard is a good idea?

- Yes
- No

Please explain your answer.

Argyll and Bute has a high percentage of older residents and this is increasing. Mobility is therefore an important issue for our communities and also for our many visitors. Accessibility is therefore a key issue and should be regularly monitored to see when improvements need to be made.

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Facilities to allow access for those with limited mobility will therefore be a priority but in addition to improved access for foot passengers the movement of luggage should also be considered. Consideration for example, should be given to providing separate luggage transfer facilities, equivalent to the service provided to air passengers, on the larger vessels.

It is also worth noting that estimated the Purple Pound nationally equates to £249 billion per year. Argyll and Bute Council would also welcome efforts to improve accessibility and be known as a fantastic accessible destination for older people.

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

Although improvements to vessel/shore infrastructure goes some way in improving access standards adequate crew/staff training ensures that most access issues can be addressed as and when they occur.

Q14. What do you think should be included in this standard?

Please explain your answer.

The value of smaller passenger ferries and workboats to improve our areas accessibility needs to be recognised. That said, small boat operators will find it too expensive, or impractical, to comply fully with one size fits all regulations. Consequently, there is a need of greater understanding here through better engagement with communities to better understand the constraints as well as the requirements of the local community to sustain or improve marine accessibility.

Access standards and requirements should be included within the tender process however they should not be so prescriptive as to create an unacceptable financial barrier for an economical affordable bid to be made.

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

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

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

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

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

An accessibility indicator system would be beneficial but would need clear definition of its rating system. Indicators would require to inform on the 'level' of accessibility rather than in terms of 'accessible' or 'not accessible'.

Reliability and Resilience

Community feedback highlighted that the reliability and resilience of ferry services needs to be seen as a priority due to the impact on communities, businesses and visitors when ferry services are disrupted.

Q15. Do you agree or disagree that the first priority of the Islands Connectivity Plan should be to improve reliability and increase resilience of ferry services?

- Agree
 Disagree

Please explain your answer.

Argyll and Bute given is the second largest geographic area of any Scottish Local Authority but with less than 2% of the total population of Scotland. The area is also characterised by its diverse geography with 23 inhabited islands and long peninsulas and as such, lifeline ferry networks are essential to support a sustainable, well connected economy.

Reliability and resilience of lifeline ferry services is critical as communities are often completely reliant on these to access key services, education and employment opportunities. Data on trip use for education/employment/NHS usage etc should also be recorded to better understand customer needs. At time of booking there should be a request for purpose of your journey, some may not want to provide this information, (potential to also force an answer before proceeding to next stage of booking), but at least this would give some idea of use/needs of the ferry service.

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Our island communities and many peninsula communities depend on these services. They are critical lifeline routes. In terms of performance measures the satisfaction of these communities with the service needs to be a measured together with feedback from users of the ferry service.

It is also critical to individuals, particularly commuters, and local businesses that performance measures are relevant to their experience, informative for the operator and the Government, and ultimately lead to year on year improvement and reliability over the life cycle of any contract awarded.

Timetable, Essential and Urgent Travel

We are aware that as ferry travel has become more popular, some services have become more difficult to accommodate short-notice spaces for essential vehicle travel by island residents and key workers.

Q16. Do you have any suggestions as to how the booking process could release vehicle space on services when island travel with a vehicle is essential?

Please explain your answer.

The needs of local residents is paramount. Also the visitor economy is very important for the future sustainability of island communities and it is important to remember the visitor season to our islands can be short and is in competition with a global industry.

Tourists & visitors to our islands are often dependent on using vehicles. Many would find it difficult to use the active / public transport methods to limit demand for vehicle space particularly given their requirement for luggage and limited public transport options.

Keeping more tourist traffic in standby lanes until the last minute to ensure space was available for local / urgent use could result in considerable uncertainty, reduced bookings and a reduction in revenue for island businesses. This would generate corresponding complaints from disappointed visitors and businesses unable to secure income.

The situation would be better handled by increasing ferry capacity through additional sailings. It is also worth noting that island communities have considerable concern over the use of larger vessels sailing less frequently given the capacity of the destination i.e. the island road network.

Integration of Services

Journeys on our ferry networks are often only part of a longer journey between the traveller's ultimate origin and destination. The end-to-end journey can combine the use of several transport modes which can include public transport and/or active travel (walking, wheeling, and cycling) or a private vehicle. An integrated transport network that allows easier transition between the ferry and public transport or active travel is a key enabler to encourage the use of our ferry networks without the need for a private vehicle. This has benefits to the user such as making the transport system more accessible, making better use of capacity on ferries and contributing to net zero.

Q17. What would encourage you to use public transport or active travel as part of your overall journey when using the ferry services?

The current economic and challenging fiscal climate has placed considerable pressure on Local Authority budgets and this is making it increasingly difficult to invest in sustainable transport infrastructure projects. In Argyll and Bute this issue is compounded by the fragile condition of large parts of the local road network which is so vital to the region. As such, Argyll and Bute Council rely heavily on grant funding such as Cycling Walking Safer Streets (CWSS) and Sustrans Community Links funding to deliver active travel infrastructure projects in the region. Investment in proper active travel infrastructure is required to make this a feasible option and this needs to be designed to suit local circumstances and available budgets. Currently, grant funding conditions set by third party funders can however make projects unviable to deliver. There needs to be adequate public and active travel options on either side of the ferry journey. A number of our islands are large in size with a dispersed population that requires the use of the private car to reach final destinations.

Many of our communities have very limited public transport options and this is reducing due to revenue constraints. This applies on both sides of the ferry journey from the mainland and islands. There could be other implications in taking this approach. For example, reaching Rothesay by the main ferry by public transport is a relatively easy option provided it is timed with the leaving times of the ferry. Public transport on the island is limited so this automatically restricts visitors to one part of the community or having to go to considerable expense to say hire a car or use a taxi service. On Bute what happens when the main ferry goes off line and people have no alternative but to use Colintrive? How will they get there by public transport? More importantly how will they return their original destination from Colintrive by public transport?

HITRANS have been taking forward a study regarding options to provide an improved transport hub in Oban town centre focussing around the railway station and ferry

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marshalling area. The Council welcome this study and are encouraged by the work undertaken to date however, we would also be keen to investigate the feasibility of taking forward a park and ride facility as a possible alternative to ease congestion in Oban Town Centre.

Argyll and Bute has a wide range of public transport services including lifeline ferry and air links, local and regional bus services, rail, trunk and public roads. We would agree that the connectivity between all of these elements of the transport network is vital to the region's economy.

Local authority budget cuts – pressure strained transport budget. 96% of public transport bus services in Argyll are subsidised by the Council. Opportunity for more funding to be directed towards local authorities to support rural bus services which are commercially unviable. At present the £500m committed by the Scottish Government to improve bus services by targeting areas of congestion and bus priority measures will predominantly benefit urban areas and do very little to address the lack of public transport connectivity in many rural areas. This is exacerbated by the lack of rail connectivity in the majority of Argyll and Bute.

Free travel on ferries for under 22 years is welcomed however it should be recognised that free travel is absolutely limited in a rural environment, and dependent on the ferry service timetable available/bus timetable, – e.g. bus service every 4 hours not even considering ferry connections. In Argyll and Bute 96% of the bus services are funded/subsidised by the local authority.

It should be a condition of the contract that the operator provides timeous notification of its timetable fares etc for inclusion in the national journey planner. The Ferry User Groups established could be taken forward as a vehicle for realising true integration. These have worked well in allowing the local authority to integrate subsidised public bus services to the ferry timetables. Rail have been reluctant to use the vehicle that the established Ferry User Groups offer and this should be rectified if true meaningful public transport service integration is to be realised.

Island ferry services timetables should be integrated with island air services timetable. Air services across rural Scotland are all continually being operated in small pockets in isolation from each other. Argyll and Bute Council, Orkney Council, Shetland Council, Comhairle nan Eilean Siar and Transport Scotland all have responsibility for financially subsidising Public Service Obligation (PSO) air service routes and also airports and each organisation carries out its own individual procurement for the air services it has responsibility for. There is not a joined up approach – that could offer many savings in procurement, advertising, training etc. Bundling the air services together will offer better opportunities to stimulate competition and offer linkages not currently being met and ensure no islands are left behind. For example ABC operate and subsidise a PSO air service from Oban to Coll, Colonsay and Tiree. Transport Scotland operate and subsidise a PSO from Glasgow to Tiree yet these services are procured in isolation from one another with no joined up approach.

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Air services from Oban to the central belt and international airports of Glasgow or Edinburgh would complement and mirror the air services supported to the south of Argyll by Scottish Government from Campbeltown to Glasgow (another subsidised Transport Scotland PSO route). Oban airport can easily accommodate the Scottish Governments newly purchased Twin Otter aircraft that are utilised on the Scottish Governments routes from Barra/Tiree connecting to Glasgow. The Tiree and Barra flights all fly over Oban at present without connecting and this is seen as a missed opportunity. As highlighted within the 2013 HITRANS economic air route development report, new air services operating out of Oban airport offer the greatest economic return for the west coast of Scotland – making it the perfect choice to act as a regional west coast hub airport.

Capacity and Demand

We have heard that the space for vehicles on busy ferry routes fills up quickly at popular times, especially in summer. This makes it difficult for residents of those islands, and visiting key workers, to travel with a vehicle at short notice.

We propose to address ferry capacity issues by:

- Using refreshed community needs assessments to identify different options for service frequencies and vessel size
- Collaborate with operators and communities to identify ways of using existing and planned capacity better
- Identify the key “pinch points” on the Clyde and Hebrides Ferry Service and Northern Isles Ferry Service networks and consider options for additional vehicle capacity where this is practical, beneficial, and affordable.

Q18. Do you agree or disagree with this approach to dealing with ferry capacity due to increased demand?

- Agree
 Disagree

Please explain your answer.

Communication on a regular basis between the ferry operator and users of the ferry is essential. There needs to be a requirement for regular dialogue informed by regular transport capacity studies linked to estimates of future demand from industry and residents. The capacity of the current ferry fleet has been severely compromised due to the age of the fleet and a lack of capacity to deal adequately with the impacts of mechanical failure or other events. This impacts negatively not just on island residents

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but also the ability to attract people to the place in the future. In addition the importance of the visitor economy cannot be underestimated for our island communities. Without visitors many island services or businesses would not be sustainable and a lack of capacity in the ferry network last summer for example, hit hospitality businesses very hard when ferries were not available or diverted to cover other routes.

Freight

The Scottish Parliament's Net Zero Emission Transport (NZET) Committee recommended reconsideration of wider policy on the provision of freight capacity on our ferry routes; and the point at which profitable businesses should no longer be reliant on public subsidy of their freight costs.

Q19. In what way do you think the costs of island freight transport could be shared differently between users and public funding?

Being able to plan ahead over extended periods of time. Dedicated overnight freight services as described previously is one idea. Or dedicated freight sailings at off peak times for example, within the existing timetables could also be a consideration.

Incentives could be introduced to encourage operator innovation in service provision. For example operators could be allowed to operate at their own cost, services out with the specified contract timetable should they feel it is profitable to do so. Consideration could be given to a maximum fare scale to allow tenders to use their experience and innovation to 'pitch' fares/offers in order to create the maximum revenue and thus reduce the level of subsidy.

The principle of freight user pays for investment funding whilst giving greater transparency would inevitably result in significant increases for users and potentially affect viability. The national government should meet a substantial part of the costs whilst revenue generated through freight fares can off set some of the costs.

Vessels and Ports

To renew the vessel and port assets, required for the long-term sustainability of our current networks, prioritising where to invest is required due to budget constraints in the current financial environment. We are proposing that the following factors are taken into consideration when making decisions on prioritisation:

- The sustainability of ferry services by maintaining and increasing reliability and resilience.

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- Ferry routes and services providing the primary transport connection for people, goods and services required for the sustainability of each community.
- Those communities identified as at greater risk of depopulation and economic decline.

Q20. Do you agree or disagree that these are the right factors to consider when making decisions on prioritisation?

- Agree
 Disagree

Please explain your answer.

There are no trunk roads or rail services on any of Argyll's 22 inhabited islands and a number of our local island communities are accessed by lifeline ferry and air services via local authority port and airport infrastructure. As with Transport Scotland, local authorities require increased funding to futureproof and improve our transport assets so that these can be a driver for national priorities such as inclusive economic growth, decarbonisation and improved health and wellbeing. As it stands, many of Argyll and Bute's most fragile rural communities have been largely excluded from future transport investment via STPR2 and this has the potential to exacerbate issues such as depopulation, social isolation and rural fuel poverty.

We are supportive of these factors however, it must include local authority ports, harbours and ferry services or there is a risk that certain island communities will be excluded. Argyll and Bute Council currently operate 4 ferry services to the islands of Jura, Luing, Lismore and Easdale and we also own a number of ports which form part of the CHFS ferry network. It is therefore vital that our infrastructure is considered as part of future long term plans and investment programmes.

Q21. Currently the factors above are not ranked. Do you think they should be?

- Yes
 No

Please explain your answer.

The Scottish Government have recently published "A Scotland for the Future – The Opportunities and Challenges of Scotland's Changing Population." This document recognises the significant challenge of depopulation in many rural communities and an ageing and declining population represents one of the biggest challenges facing many communities in Argyll and Bute. The Government's Strategy sets out four 'building blocks' which will serve as distinct work streams for the Population

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Programme and these include a “A More Balanced Population.” With rural communities and those in the West experiencing population decline, while many in the East experience increased population growth, we must ensure our population is more balanced and distributed across Scotland so that all our communities can flourish.

STPR2 could and should have provided a vehicle to address this building block given the importance and necessity of adequate transport infrastructure to rural areas however, at present there is a risk that the decision to de-scope local authority transport services and infrastructure will exacerbate issues such as rural depopulation.

It is again noted that many of our rural island and peninsular communities are entirely reliant on Local Authority roads and public transport services for connectivity and these communities will be largely excluded from investment via STPR2. In summary, Argyll and Bute Council do not support Transport Scotland’s position with respect to local infrastructure being considered out of scope of STPR2 and believe that this will undermine local authority’s ability to support the delivery of the vision and objectives of NTS2/STPR2.

Low Carbon and Environmental Impact

A Strategic Environmental Assessment will be carried out on the of the Islands Connectivity Plan. This process aims to ensure environmental and sustainability aspects of the Plan are captured and considered in the development of policies and plans detailed in the draft Islands Connectivity Plan.

Q22. What environmental issues do you believe should be captured in the Strategic Environmental Assessment in relation to this plan?

Please explain your answer.

It will be difficult to achieve climate change objectives by reducing vessels speeds to slow down on Carbon emissions as this is in direct conflict with users of the service whose majority wish as fast a journey sailing as possible.

However consideration of how to best optimise the ferry services to transfer road freight to sea will offer a reduction in road haulage miles and reduce the carbon footprint. Untapped markets by identification of ferry routes that would optimise the freight market would also bring added revenue and reduce the level of subsidy.

It simply requires investment in new ferries that are more efficient to operate and less prone to mechanical breakdown and are also able to deal with increased weather impacts. The use of clean fuel technology needs to be employed asap whether that is through electric motors or use of green hydrogen. Simply reducing vessel speeds to lower emissions would lead to a poorer service and fossil fuels would still be used. Making maximum use of ferry capacity would also increase efficiency and perhaps the use of flexible fares here could help with this.

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The Scottish Government committed in the Climate Change Plan to 30% of the ferry fleet, owned by Scottish Government, to be low emission by 2032. The Scottish Government is committed to looking at how they can use hybrid and low carbon energy resources for the fleet, which is currently taking place through the small vessels replacement programme.

Q23. Do you have any other suggestions in how ferry services can contribute to the reduction of carbon emissions?

Please share your views.

There could in the future be innovative propulsion choices such as fuel cell technology/diesel electric propulsion.

Reduced carbon footprint can only be achieved where there is adequate public and active travel options on either side of the ferry journey. A number of our islands are large in size with a dispersed population that requires the use of the private car to reach final destinations.

That said, passenger ferries are very popular with residents and visitors. For example, the Tayvallich to Jura Ferry and these connections should be encouraged and supported wherever possible to provide credible alternatives to using vehicles.

There could also be opportunities for regional boat builders if smaller, electric vessels were commissioned by C MAL to open up accessibility in our coastal communities.

Consideration should be given as to how to best optimise the ferry services to transfer road freight to sea will offer a reduction in road haulage miles and reduce the carbon footprint. Untapped markets by identification of ferry routes that would optimise the freight market would also bring added revenue and reduce the level of subsidy.

Ferry Fares

The Road Equivalent Tariff (RET) system of fares is in place across the Clyde and Hebrides Ferry Service (CHFS) network for passengers, cars, coaches and small (under 6 metres long) commercial vehicles. A different fares structure remains in place for the Northern Isles.

A key aim of RET was to allow ferry users to pay a fixed element plus a rate per mile travelled, which is linked to the cost of the equivalent journey length by road in a private vehicle. RET also resolved many previous issues of complexity in the fares offering and fare-inconsistency across routes, within the CHFS network.

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The 3 key principles of RET are:

- **Simplicity and Transparency** - the basis for fares must have an established rationale and simple for a user to understand.
- **Comparability and Consistency** - the basis for fares should be the same for each community.
- **Public Sector Affordability versus Community Sustainability** - fare-setting needs to balance the different requirements of public sector affordability with sustaining communities.

Q24. Do you agree or disagree with retaining the current RET principles set out above, as the basis of a ferry fares structure?

- Agree
 Disagree

Please explain your answer.

It needs to be recognised that each community has different needs and as a consequence of this there cannot be a one size fits all policy. With specific regard to Bute for example there is significant impact on residents and supply chains at peak tourism times. For example, ambulance patient transfers delayed, mainland hospital appointments missed, parts for local garages delayed. That said many local businesses on Bute (and other Islands) depend on local visitors to remain viable so there needs to be a balance struck to ensure the needs of all ferry users are fully taken into account.

Whilst the concept in principle for fixed links is welcome, the suggestion that a fixed link could be progressed to Mull is a distraction for the Craignure shore side project (replacement pier and associated shore side infrastructure). There needs to be clarity provided around the possibility of this fixed link location being progressed or not. Confirmation either way and timescales should a fixed link be a likely will be a consideration for the business case for the Craignure Pier development. A fixed link to Mull, whilst bringing opportunities would also have the potential to increase vehicular traffic on the existing 'fragile' road network as well as having the potential to being detrimental to SGs policy of reducing car KMs by 20% by 2030.

Another example concerns the island of Mull where there is a commuting issue for people working in Lorn on a daily basis. High ticketing prices at peak times therefore on that route is likely to negatively impact on local residents to a greater extent rather than visitors. ABC would welcome further details on the proposed STPR2 consideration of a fixed link to the island of Mull and where this link is proposed. We have not to date seen mention of this proposal in any previous documentation. Fixed links were only previously mentioned in relation to the Clyde and Hebridean Ferry Services contract and not specifically to the island of Mull. Given the detrimental

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impact on island infrastructure that has resulted from the introduction of RET we would have thought a fixed link would only compound this – again another example of why there needs to be consideration of local authority infrastructure and a joined up approach. We understand that a business case on this intervention is proposed and we assume this will also identify what likely impacts such a transport intervention would have on the local economy of Oban. The lack of clarity on the proposal is causing uncertainty in terms of future ferry and port investment. ABC would request an urgent meeting with TS to discuss this issue particularly in light of the islands connectivity plan and recent announcements.

Significant consideration should be given to the provision of fixed links to islands where it is cost effective. Whole life costings of the ferry service should be compared with a fixed link solution. Argyll and Bute Council have carried out a STAG assessment on provision of a fixed link to Lismore, Luing and Easdale where a fixed link to these islands offers a solution to the provision of a ferry service.

The issue of peninsula communities should also be addressed as although connected to the mainland these communities can still suffer from isolation. Argyll and Bute is characterised by numerous peninsulas separated by deep sea lochs. We feel that a designation is needed for peninsula access along the same lines as islands that conveys the lifeline nature of ferry services to these areas in supporting and sustaining social and economic well-being.

On Islay there are specific business needs that need to be taken account of that impacts on the accessibility of the service for residents and also visitors.

It is also worth noting that Argyll and Bute is characterised by numerous peninsulas separated by deep sea lochs and includes 23 inhabited islands. It is important to retain flexibility to provide and sustain access and economic stability because of the essential and lifeline nature of ferry services.

Introducing different levels of fares such as “islander fares” on Clyde and Hebrides Ferry Service routes, could increase overall fare revenue and keep services more affordable for islanders. It could also allow use of different fare types to tackle overcrowding of vehicle-deck capacity, on busier sailings through the year.

Q25. Do you agree or disagree with the option to create different levels of fares for different types of users, e.g. islander and non-island residents.

- Yes
 No

Please explain your answer.

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The changing of ticketing prioritisation linked to measures such as peak demand fares etc. may be a way to manage demand but there is a need to look at all potential negative impacts of this approach. For example, will dearer ticketing during commuting times deter local residents accessing work opportunities? Will it be used as an excuse not to accept bookings at weekends where most demand for visitors are due to change overs in self-catering? Will additional costs deter visitors to our islands particularly where our islands are in close competition with mainland coastal communities? Will it be balanced by significantly lower fares targeted at particular user groups?

Levels of charges are by no means the only impediment to or stimulus of local economic activity. Frequency and passage times have a significant bearing on traffic generation, capacity and operating costs. Hours of operation also have a bearing on quality of access. In contrast to Cowal where services run till late evening provided by Western Ferries, Bute , Gigha etc although relatively close to the mainland are cut off from any physical communication with the outside world from early evening onwards this is a serious economic and social constraint. Whilst considering additional specifications to tender documents a review of existing specifications should also be carefully considered.

There needs to be careful consideration of the islands and peninsulas needs and ambitions for their communities when considering fare structures e.g. changes in economy related to renewable energy and tourism etc and also meet the demands of changing demographics and socio-economic profile. Ferry services need to be whole life costed and flexible to unlock long term sustainable economic development and achieve the government's objectives of promoting solidarity, cohesion and sustainability.

Q26. Which of these groups do you believe should be eligible for islander fares?

- Permanent residents
- Second homeowners
- People who work, but do not live, on islands
- Island residents who are currently students and living at mainland addresses during term-time
- Service providers
- Nominated friends & family
- None

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Q27. Do you agree or disagree with a fares structure that both encourages passengers to travel without a private vehicle and incentivises travel at quieter periods?

- Agree
 Disagree

Please explain your answer. If other, please add further information.

Argyll and Bute is characterised by numerous peninsulas separated by deep sea lochs and includes 25 inhabited islands. It is important to retain flexibility to provide and sustain access and economic stability because of the essential and lifeline nature of ferry services.

The future economic needs of these remote communities should be identified to ensure that any increase in fares, to accumulate more funding from users, does not impact adversely on the economy. These types of economies are already fragile as they are susceptible to the impact that uncontrollable factors can have on the seasonal industries the majority rely on e.g. weather plays an important role in tourism, farming and fishing and can make or break a season.

Tourists & visitors to our islands are usually dependent on using vehicles. Consequently, many would find it difficult to use the active / public transport methods to limit demand for vehicle space particularly given their requirement for luggage and limited public transport options.

As already stated above, the current economic and challenging fiscal climate has placed considerable pressure on Local Authority budgets and this is making it increasingly difficult to invest in sustainable transport infrastructure projects. In Argyll and Bute this issue is compounded by the fragile condition of large parts of the local road network which is so vital to the region. As such, Argyll and Bute Council rely heavily on grant funding such as Cycling Walking Safer Streets (CWSS) and Sustrans Community Links funding to deliver active travel infrastructure projects in the region. Investment in proper active travel infrastructure is required to make this a feasible option and this needs to be designed to suit local circumstances and available budgets. Currently, grant funding conditions set by third party funders can however make projects unviable to deliver. There needs to be adequate public and active travel options on either side of the ferry journey. A number of our islands are large in size with a dispersed population that requires the use of the private car to reach final destinations