

## **INFORMATION ON YOUR INVITATION TO RESPOND**

### **CONSULTATION ON SCOTTISH FERRIES REVIEW**

#### **Responding to this consultation paper**

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

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

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

Or

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

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

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

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

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

#### **Handling your response**

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 If you ask for your response not to be published we will regard it as confidential, and we will treat it accordingly.

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

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

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

What happens next?

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

Comments and complaints

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

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

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

## RESPONDENT INFORMATION FORM: SCOTTISH FERRIES REVIEW

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

1. Name/Organisation: Shetland Islands Council

2. Postal Address: Transport Service, 20 Commercial Road, Lerwick,  
Shetland

Post Code ZE1 0LX

Phone number 01595 744868

Email address

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

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

### INDIVIDUALS

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

Yes  No

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

Yes, make my response, name and address all available

or

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

or

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

### ON BEHALF OF GROUPS OR ORGANISATIONS:

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

Yes  No

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

Yes  No

## THE SCOTTISH GOVERNMENT CONSULTATION PROCESS

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

The Scottish Government encourages consultation that is thorough, effective and appropriate to the issue under consideration and the nature of the target audience. Consultation exercises take account of a wide range of factors, and no two exercises are likely to be the same.

Typically Scottish Government consultations involve a written paper inviting answers to specific questions or more general views about the material presented. Written papers are distributed to organisations and individuals with an interest in the issue, and they are also placed on the Scottish Government web site enabling a wider audience to access the paper and submit their responses<sup>1</sup>. Consultation exercises may also involve seeking views in a number of different ways, such as through public meetings, focus groups or questionnaire exercises. Copies of all the written responses received to a consultation exercise (except those where the individual or organisation requested confidentiality) are placed in the Scottish Government library at Saughton House, Edinburgh (K Spur, Saughton House, Broomhouse Drive, Edinburgh, EH11 3XD, telephone 0131 244 4565).

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

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

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

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

**While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process, consultation exercises cannot**

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1.

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

**address individual concerns and comments, which should be directed to the relevant public body.**

## Appendix 2: Consultation Questionnaire



**The Scottish Government**  
Riaghaltas na h-Alba

# Scottish Ferries Review: Public Consultation 2010

## Questionnaire

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

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

Consultation responses may be emailed to:

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

or posted to:

*Scottish Ferries Review Consultation*

*Ferries Division*

*Transport Directorate*

*Scottish Government*

*Area 2F Dockside*

*Victoria Quay*

*Edinburgh EH6 6QQ*

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

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

# Scottish Ferries Review Public Consultation 2010 Questionnaire

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

Postcode:	ZE1 / ZE2
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Consultation Question 1: Do you agree that a change is required, to improve consistency in provision and secure funding for the future?

Yes

No

## Comments:

It is recognised that there isn't a consistent approach to the funding and provision of ferry services in Scotland currently and improving this situation is important.

However, recognising that different communities have different needs that relate to different strengths, opportunities and constraints, the pursuit of consistency must avoid the risk of a "one size fits all" outcome.

It is essential to secure capital funding for vessel and terminal replacement and any measures developed should ensure the right mix of opportunities exist and there aren't unrealistic or disproportionate expectations placed on a single sector be it public or private operators or National, Regional or Local delivery agents.

In terms of on-going revenue funding any proposals for change must acknowledge the significance of the increasing difficulty for users to pay as the volume of passengers and traffic decreases. i.e. on a high volume route costs can more easily be dissipated across the user base compared to lower volume routes where any increases in cost must be absorbed across a smaller user base.

We should also recognise that current successful social and economic structures have built over time as a consequence of the levels and costs of ferry services provided. Any significant changes will have profound effects.

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

self-funded

funded through grants

**Comments:**

Great care needs to be taken with any self funding proposal that the level of charges resulting do not discourage vessels calling at ports or, assuming some or all of any charges levied are passed on to the user through fares and tariffs, that affordability to users is unacceptably compromised.

When shore side infrastructure and ferry services are provided by the same organisation then this model is perhaps less relevant.

There are different issues raised depending on the ownership of the terminal and a common funding policy will not work for all. Especially Trust ports that are more than just the ferry terminal and are usually commercial ports as well need to be able to attract sufficient income through their charges to allow reinvestment. There could also be competition issues if they use grants that are not available to other ports to reduce their charges.

In circumstances where ferry services are not commercially sustainable and therefore require subsidy then increasing harbour dues to create funds for future capital maintenance and development will simply filter back through the operator to the funder in the form of increased requirement for subsidy (assuming the consumer would not be obliged to meet all or some of the cost).

On balance it would be most effective to fund harbour improvements for facilities that are only ferry terminals through grants but routine maintenance costs should be recovered through harbour dues.

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

**Comments:**

It isn't possible to express the level of funding that should come from users in absolute terms (say as a percentage of the costs of the operation) but, accepting that there is a willingness to pay, the users should contribute an amount that reflects their ability to pay and takes account of the drivers that make travel an essential requirement. For example, if a community needs access daily to services and opportunities off island then this needs to be viewed in a different perspective to a situation where more services and opportunities are available on island and the need to travel as frequently is less. We should look beyond the cost of individual journeys and look at the cost of meeting an overall need to travel.

This would also help develop a better understanding and perhaps an acceptance that different fare structures are essential to support different sets of needs.

Care has to be taken not to discourage discretionary travellers such as tourists by fares that are higher than they are willing to pay. It is better to encourage more visitors who will spend money in a community rather than discourage visitors.

In the case of lifeline services the cost to the user of the service is fundamental to the ability of communities to access essential services and economic/ social opportunities available on the mainland. In Shetland, on the internal ferry service the relatively low fares have enabled communities to access a wide set of opportunities that has led to sustaining vibrant communities and excessive increases could have damaging effects socially and economically.

Recognising that accessibility to services and economic/ social opportunities differs widely across island and peninsular communities throughout Scotland then this would need to be considered on a route by route basis with clear understanding of the impact on the communities served of any changes in charges.

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

Yes

No

**Comments:**

Only route suggested with relevance to current Northern Isles contract is the Pentland Firth where competition already exists. It makes sense to tender this route separately if for no other reason to test how the market responds.

By tendering Scrabster/ Stromness separately there must be no adverse effect on the Shetland's only lifeline ferry link from Aberdeen to Lerwick.

Also, certain protection mechanisms would be necessary to ensure that if performance is inadequate or the service collapses then there is a safety net in the form of a Government commitment to be the "operator of last resort".

A couple of obvious questions arise in considering that matter which are perhaps worthy of note: -

If operators bring own vessels, what will happen to the existing vessels which will become redundant?

What will tendering some routes separately do to the total network costs?

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

Ardrossan - Brodick

Yes

No

Wemyss Bay - Rothesay

Yes

No

Oban - Craignure	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Largs - Cumbrae	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Pentland Firth	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

**Comments:**

These are all relatively high volume routes. Is it worth trialling a low volume route as well?

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

allow a bundle  X                      stagger the tenders

**Comments:**

Tenders must run concurrently to allow potential operators to reflect possible economies of scale in their tender prices.

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

Yes                       No

**Comments:**

The definition of the two remaining bundles isn't explicitly stated. Intuitively, taking the Pentland Firth service as a single bundle would leave the Aberdeen/ Kirkwall/ Lerwick as a separate single service bundle. In principle this makes sense provided that the debundling does not disadvantage Shetland and/ or push up overall subsidy costs.

Furthermore, from Shetland's point of view, the question would be whether the current Streamline freight service would be included in a specification for the bundle. If it is not, then consideration should be given to ensuring that the tender for the lift - on / lift - off service is aligned with the Northern Isles tender for 2012 to generate greater potential for economies of scale to be realised.

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

Yes                       No

**Comments:**

It is important that Shetland Islands Council / ZetTrans have input to this process.

In Shetland the current service to and from Aberdeen fails to meet needs in terms of capacity and frequency for significant periods in the year. When looking to the future and Shetland's need to increase population, diversify and develop existing and new industries to maintain and grow economic performance there is a need to address the current constraints of the service.

Therefore, it is important that the specification of "minimum level of service" describes what is required to enable Shetland to be economically and socially sustainable. To ensure this is achieved it would require significant involvement of the Island Councils and Regional Transport Partnerships to ensure any specification is realistic and relevant.

If operators can demonstrate that needs can be met through innovative alternatives then this could be encouraged provided the assessment of tenders was sufficiently capable of appraising how alternatives would meet needs compared to the specified service and also provided that monitoring during the contract period was adequate to prove needs were being met.

Any operator must be contracted to deliver the level of service needed by the communities. If the tender only specifies the minimum level of service, then the final contract must include the contracted operator's innovation in the contract.

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

**Comments:**

The question of responsibility in delivering higher levels of environmental performance is always a thorny issue when it is discussed in the context of also meeting fundamental economic and social needs.

An obvious tension that may develop is that if operators are constrained to using existing vessels and environmental performance targets are set in the contract that demand improvements on historical performance then there may be little opportunity for improvement without significant investment in new technology or significant increases in journey times (in the case of slowing vessels down).

Climate change objectives should be specified in the process but should be proportionate to the circumstances. The fundamental challenge for Scotland's island communities is economic and social sustainability and that should be at the forefront of the purpose of any transport link.

SIC / ZetTrans is looking at a project to develop a Liquid Natural Gas powered dual

purpose freighter which would considerably reduce emissions. This would also provide bulk storage facilities for LNG in Lerwick for other vessels to use.

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

**Comments:**

The contract should clearly set out obligations in terms of minimum levels of frequency and timetable, levels of integration with other modes and services, and accessibility requirements. This should be applied to all elements of demand i.e. passengers, freight, livestock, etc.

The contract should also clearly define obligations to continually engage with communities and stakeholders as part of performance monitoring and assessing effectiveness of the service.

Consideration should be given to structuring any contract to require the operator to work with the sponsoring body to adjust the service to react to changes in the economic and social requirements of communities.

We would also suggest that it is a contractual obligation to provide access to data to support Transport authorities (Councils, RTPs, etc.) in their work in developing transport strategies and implementation plans.

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

**PLEASE TICK ONE BOX ONLY**

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

**Comments:**

It is not possible to prioritise one of the above over the others.  
(b), (c) and (e) are all very important factors at the Shetland wide level and at the level of individual island communities.  
(f) is important in the current climate but if it is achieved at the cost of (b), (c) and (e) then the value of savings is greatly diminished or even undesirable.  
(g) is intuitively desirable but again not at the cost of (b), (c) and (e). Fares should not create a barrier to travel. Fares should help to manage demand. They should contribute to the cost of delivering the service but at the correct level.  
The overall aim of any fares policy should be to support the ability of communities served to achieve economic growth potential locally, regionally and nationally.

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

**Comments:**

Fares should differentiate between "lifeline" and other ferry services where "lifeline" is defined as the only way to get passengers, vehicles and freight to and from remote communities. They should also differentiate between those who must travel and those who choose to travel. However, fares should not be so high as to discourage discretionary travel. Shetland is already perceived as an expensive destination.

Fares must be set to ensure that they are affordable to allow all island residents to access the services, facilities, and employment they require to carry out their lives.

Fares should also encourage visitors to use the services and it is entirely reasonable that fares should reflect different groups of users that have differences in their willingness/ ability to pay.

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

one fares policy           different fares policies

**Comments:**

There is no case for the same fares policy on all routes.

The fares policy must address the needs of each community and equalise the ability of communities to overcome barriers to access necessary services and opportunities.

The points raised in Question 3 are relevant here also.

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

Yes

No

**Comments:**

Not possible to give a yes or no answer without a shared interpretation of "consistency". At the most basic level public funding should be used to provide ferry services where the free market either does not respond at all or does not provide a level of service that meets the needs of the community or communities served.

Shetland favours the external ferries being funded by Scottish Government but the inter island services being controlled locally and funded similar to the current model.

This is consistent with the funding of roads on mainland Scotland where central government funds the construction and maintenance of the trunk road network.

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

Yes

No

**Comments:**

The ferry services need to be designed to meet **all** the current and changing needs of the communities, where possible. The needs should be prioritised only if they are contradictory and/ or an informed decision is made that all needs will not be met.

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

**Comments:**

We presume this is referring to the MVA "Report on Routes, Services and Integration".

We believe that pages 120 & 121 and 126 & 127 are the relevant sections of the report.

It is difficult to tell from the report whether the Government's assessment of our community is accurate. Reviewing the report there appears to be an imbalance in the detail gone into for different islands and island groups.

Although there is reference to individual fact sheets in the report it wasn't until 15 September 2010 that they were made available to us and this was after the

workshops to discuss this draft response.

Based on the limited data that is presented in the report and the fact sheets and the limited time available to fully analyse and consider these it is our opinion that there are significant flaws in the data and therefore any analysis and conclusions drawn from the data cannot be wholly relied upon for decision making.

It is disappointing that the report and fact sheets were not available for comment along with the other consultants' reports. It is important that dialogue takes place with Scottish Government Officials before this information is used as the basis for the draft Ferries Plan.

To answer the question of what the Shetland Community's needs are; Shetland's requirements of transport can be summarised in the terms of the Shetland Transport Strategy Vision: -

To develop an **effective, efficient, safe** and **reliable** transport system for Shetland. The transport system will comprise an **integrated** network of **accessible**, and **affordable** internal, inter-island and external links, which will contribute to the development of a **safe, healthy, vibrant** and **inclusive** society, a **diverse, successful** and **self-sufficient** economy, and enhanced **environmental quality**.

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

Yes

No

**Comments:**

Most certainly not. This would lead potentially to vulnerable communities getting no investment and continually worsening services.

Although the Government's Single Purpose to generate sustainable economic growth is clear we don't believe that intent should lead to the decay of the most vulnerable and fragile areas of Scotland.

Who would decide which areas were to get investment and which were to be allowed to decline further?

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

Yes

No

**Comments:**

It is acknowledged that ferry services are funded and provided in different ways

throughout Scotland. The focus should look beyond consistency and also consider the provision of services in "what matters is what works" perspective.

As said in Q14 above, Shetland favours its external ferries being funded by Scottish Government but the inter island services being controlled and funded as they are now.

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

Yes

No

**Comments:**

See Q 14 and 18.

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

Yes

No

**Comments:**

This is nearer our view subject to suitable mechanism for capital and revenue funding.

However, care would need to be taken to understand clearly how alternate models would need to be resourced and whether changing the status quo provides new opportunities for innovative ways of funding and delivering services.

It should also be noted that not all organisations have an immediate ability or capacity to take on a delivery role.

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

Yes

No

**Comments:**

This is not relevant for Shetland but makes sense except where travel distances by road make ferry links important. cf peninsulas.

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

Yes

No

**Comments:**

See Q 14, 18, 19 & 20.

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

Yes

No

**Comments:**

If the role of RTPs in the procurement and management of ferry services grew then greater levels of control and accountability at the local level could be achieved where the detailed knowledge of needs and objectives exist. In effect it could give local authorities more opportunity to shape services according to local/ regional needs and priorities.

This assumes that necessary funding and resources of an appropriate level, both now and in the future, follows the responsibility for function.

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

**Comments:**

External services - Government/ RTPs

Inter islands services - Local authorities

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

Yes

No

**Comments:**

See questions 14, 18, 19, 20, 23 and 24

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

**Comments:**

See questions 14, 18, 19, 20, 23, 24 and 25

Consultation Question 27: Should there be a central provision of procurement expertise? For example, Local Authorities/RTPS could determine what services/vessels they wanted to provide and specify those services/vessels, with a central procurement team purchasing them on their behalf.

Yes

No

**Comments:**

Would need to be convinced of the benefits of this. It could be argued that Shetland already has as much experience as any central procurement team.

Another concept to explore could be a central brokering role where a facility is established coordinate the building requirements throughout the country and broker contracts with yards and suppliers but each authority manages their contracts and business as they normally would. This could bring benefits of economies of scale whilst ensuring control and accountability is retained at the local level ensuring solutions are fit for purpose.

Consultation Question 28:

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

Yes  X                      No

**Comments:**

All of these are worthy initiatives.  
Implementation would depend on available resource and circumstances.

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

Yes  X                      No

**Comments:**

Again, it is a worthy objective and attention must be paid to avoid any risk of disproportionate compromise to economic and social imperatives.

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

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

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

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

D. Accessibility information should be readily accessible to PRMs in order to aid journey planning. Where possible websites should be improved to take

recognition of the needs of PRMs and make it easier to access this information.

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

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

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

**Comments:**

It is important that society continues to address accessibility constraints and that future contracts directly address this.

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

**Comments:**

Consultation Question 29:

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

Yes

No

**Comments:**

Recognising that addressing accessibility issues is often something that fails to reach a high priority as service pressures and operational pressures increase then an accessibility improvement fund may be a means of enabling operators and sponsoring bodies to focus on improvements in this area.

(b) How would this be funded?

**Comments:**

It should be a Government funded initiative along the same lines as travel planning and sustainable/ active travel type interventions.

(c) Who would administer this fund?

**Comments:**

Seems sensible that this should be centrally held and managed by the Government through its delivery agent Transport Scotland.

Consultation Question 30:

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

Yes  X

No

**Comments:**

Any initiative that improves the capacity of those with impaired mobility to plan their journey is a welcome initiative. The discussions around a "star" system that grades vessels and facilities according to levels of accessibility seem appropriate as long as attention is paid to ensuring it is easily understood and consistently applied throughout the Scottish network.

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

**Comments:**

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

**Comments:**

Sponsors of ferry services can set targets for emissions reduction in the provision of ferry services to meet objectives of the Climate Change Delivery Plan.

In subsidised contracts for performance requirements can be specified and conditions of contract used to incentivise performance.

In directly delivered services (e.g. those delivered by local authorities) then policy commitments can be made at Council level in terms of targets to be achieved (which is equally relevant to all services that produce emissions).

Having said that, care must be taken not to increase barriers to services and opportunities unreasonably such that communities are worse off in terms of their capacity to be sustainable.

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

**Comments:**

This is a very narrow operational perspective and although there are clear

opportunities for environmental benefits and reductions in operational costs through reduced fuel burn, the overall choice about slowing vessels down must not be taken out with the context of the importance of journey times and adequate frequencies.

Investing in new vessels will allow new technology to be utilised which will allow reduced emissions such as the Shetland proposal for an LNG powered dual purpose freighter.

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

Yes

No

**Comments:**

Generally, extending journey times would only be tolerated to the extent that they did not prevent adequate access to essential services and opportunities.

Alternative methods of reducing CO<sub>2</sub> could be through vessel and propulsion design in new vessels and looking for opportunities through routine maintenance and operations to make existing propulsion systems more efficient when routine replacement or reconditioning milestones are reached for main engines and equipment.