SCOTTISH GOVERNMENT FERRIES REVIEW

CONSULTATION DOCUMENT – 10 JUNE 2010

RESPONSE BY ORKNEY ISLANDS COUNCIL, 5 OCTOBER 2010

1.   INTRODUCTION AND SUMMARY

1.1   Orkney Islands Council welcomes this opportunity to respond to the questions posed by the Scottish Government in the first phase of the Ferries Review Consultation. **The Council is committed to its role in providing transport connections to isle communities within Orkney, and informing and supporting the provision of external ferry services to Orkney.**

1.2   The Scottish Government should be commended for undertaking this review and recognising the role of lifeline ferry services in securing social and economic participation. Orkney Islands Council recognises that there is a need to strategically plan for the continuation of these services and to deliver an efficient fit-for-purpose network across Scotland.

1.3   Given the current times of austerity, change is necessary in order to secure the future of ferry services. **Orkney Islands Council highlights the iniquitous formula and consequential underfunding that Orkney Islands Council receives from Government to support the Orkney internal ferry services network. The uncertainty of capital funding and lack of financial support from the Government, has prevented the Council from commencing the essential programme of vessel and terminal replacement that has been submitted to the Government.**

1.4   It is essential that change is made to funding mechanisms as it is apparent that significant funding is required to invest in the capital improvements that are urgently needed across the network. These investments have long lead-in times, and many of the existing assets are ageing, inefficient or no longer fit for purpose.

1.5   **There are significant inconsistencies across the Scottish network, both in terms of funding distribution between local authorities, but also in terms of responsibility for services. Orkney Island Council would seek to have the current anomaly with regard to responsibility for the financing and management of islands "internal ferry" services addressed.**

1.6   **Orkney Islands Council would seek a consistent approach to fares and concessions across the Ferry network.** It is essential that the Ferries Review leads to an action plan that will fundamentally address these inconsistencies. Different applications of concessionary travel schemes exist across the network, and the national concessionary travel scheme does not apply on local ferry networks. There is inequality between isles' residents who are older, younger or disabled compared to their counterparts in mainland Scotland who are able to travel at no cost as frequently as they wish using bus services under the national concessionary travel scheme. **Ferry services that connect isles should be considered in the same manner as bus services.**

1.7 Orkney Islands Council recognises the benefits that are gained through the mix of external ferry connections that are available to residents and visitors to Orkney. **This mix of links is essential to maintaining all of the important service attributes to Orkney, namely, capacity, reliability, service accessibility and integration.**

2. CONSULTATION QUESTIONS

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

Yes þ   No ☐

2.2 Comments: If '*consistency*' is an aim for the future, then change is necessary to achieve this consistency.   The discrepancies that exist across Scotland in respect to 'local' ferry services need to be addressed. Some local ferry services are provided by local authorities and others directly by the Scottish Government. As has been described in the consultation document, Orkney Islands Council is responsible for the provision of internal ferry services; and this is an inconsistency, which places Orkney (and Shetland and Argyll & Bute to an extent) at a financial disadvantage to some of its Local Authority counterparts.'

2.3 Orkney Islands Council would identify that the sea state/open water sea conditions that the Council has responsibility for providing ferry services in, places additional burdens on it, which are not reflected in the allocation of funding within the Council settlement. It is unfair that funding is allocated on the basis of historic spend, with no account taken of the operating environment, the level of service supplied/required, and changes in legislative requirements etc. The Western Isles, by contrast, are not responsible for internal ferry services, and consequently have no revenue or capital responsibility. This is an obvious disparity of operational running cost for lifeline services in Scotland. The underfunding of internal services through the block allocation of funding from Government places Orkney Islands Council under additional financial pressure. Orkney's residents receive £600 per person less for local authority public services than residents of both the Western Isles and Shetland each year.

2.4 Orkney Islands Council would support a division of responsibility between the Scottish Government and Local Authorities based on local versus national links. Orkney Islands Council would wish the Scottish Government to acknowledge Orkney's unique position with regard to the classification of the waters in the Outer north isles and address the additional financial burden currently borne by the Council.

2.5 Orkney Islands Council has undertaken extensive work as requested by the Scottish Government to support a funding request to enable the replacement of an ageing fleet and port infrastructure. The estimated cost of the essential 'do minimum' programme to sustain the internal ferry service in Orkney is around £81M. The average age of the fleet in Orkney now stands at more than 20 years, and it is essential that a funding solution is reached with the Government in order to commence work on this programme, in order that transport links to Orkney's islands are not seriously disrupted or disadvantaged.

2.6 **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   þ   AND   funded through grants þ

2.7   It should be acknowledged that the more commercial ports are able to allocate funding from other port revenues for future capital investment. Smaller piers and harbours which may only receive income from a single ferry call will be unable to generate sufficient income to cover operating costs and future investment. Without grant aid or an increase in revenue funding, Orkney Islands Council would be unable to maintain or improve facilities within our remote communities, such as North Ronaldsay pier.

2.8 **It would need to be recognised that if no grants were available to finance maintenance and improvements, this would significantly increase the operating costs of ferry services that would require to pay additional harbour dues compared to present rates.**

2.9   The Council has supplied the Government with its STAG Study and subsequent 'do minimum' programme for ferry and terminal replacement. Regardless of the method of funding, via operators and hence through increased subsidies to operators, or through a grant mechanism, it is essential that sufficient funding is identified in order that the programme for ferry and terminal replacement in Orkney can be commenced.

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

2.11   **This will likely vary per route**, and will depend on the future of fares policy, for which our comments are discussed under Question 11 at paragraph 2.37 2.34 below. Ultimately **how much funding should come from the users' of the service would depend upon many factors, such as the fares and tariff structuring, bundling of service (related competition and subsidies issues.)** However, the objective remains to ensure consistency in funding (be it freight or persons) which would be transmitted through to harbours, infrastructure and vessels etc., on both internal and external ferry services.

2.12   This response should be set in the context of the amount of funding that is available to ferry services in Scotland. Support for ferry services (to CalMac, NorthLink and Streamline) represents just 4.2% of the total Scottish transport budget for 2009/10, whereas road and rail funding accounts for some 71% of the transport budget. It is clear that a small shift from the road and rail budget to ferry services could make a tangible difference to ferry services across the Country.

2.13 **Ultimately, these are lifeline services, and the affordability of using the services is a key determinant of social inclusion for the remote, rural and isle locations that are served by the ferry services.**

2.14 The Council has supplied the Government with its STAG Study and subsequent 'do minimum' programme for ferry and terminal replacement. This sets out the deficit in funding that exists within the current distribution of funding, and which requires to be addressed in order that work can proceed on the ferry and terminal replacement programme in Orkney.

2.15 **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 ☐

2.16 **Identified advantages would favour of single bundle which provides consistency and economies of scale.** The requirement for the operator to bring their own vessel would need to be an option only, as otherwise prospective operators without an appropriate vessel in the short term may be put off competing for the contract. Especially with a contract of only six years in length, which arguably should be longer in order to maximise opportunity for competition. Additionally, port infrastructure may be specifically designed for a dedicated boat, and any variation may not be consistent with the port infrastructure.

2.17 **Orkney Islands Council considers that any competitive advantage gained in offering single routes may be lost through the inability to achieve economies of scale which are afforded through a bundle of routes in a network. In addition, the Council recognises the benefits in a bundle of routes operating together in terms of both ease of use for residents and visitors, i.e. one phone number/website etc., and also in terms of service reliability, whereby vessels can be moved around the network during refit periods and in case of breakdown, which gives security of connection on the lifeline services under consideration.**

2.18 **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 ☐	No ☐
Largs – Cumbrae	Yes ☐	No ☐
Pentland Firth	Yes ☐	No þ

2.19 Orkney Islands Council recognises that there is value in having the Pentland Firth and Aberdeen/Shetland connections operated by the same operator, in terms of ease of use for residents and visitors, and in terms of securing service reliability during periods of refit and breakdown with the ability to move vessels around the network.

2.20 **It is important to consider complete journeys, and not just the pier to pier ferry service part of the journey.** Connections to and from the piers are equally important, as the pier tends not to be the final destination, and hence consideration should be given to both private car and public transport connections. The nature of the crossing of the Pentland Firth should pay cognisance to accessibility and relaiability of road connections throughout the year; this is in relation to both sides of the Pentland Firth. In addition consideration should be given to public transport (e.g. rail and bus) connections/interchange at piers/harbours for onward travel.

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

allow a bundle þ stagger the tenders ☐

2.22 In the interests of minimising subsidy payments, it will make sense to tender for any single routes simultaneously. However, this approach will not necessarily be consistent with maximising competition (as discussed in Question 4, paragraph 2.19), as larger and more established suppliers will most likely be able to compete for multiple routes and thereby offer a bundle discount, which will likely be cheaper than a new entrant or existing service provider competing for a single route for example.

2.23 **There are likely economies of scale to be achieved with bundling of routes, and therefore Orkney Islands Council recognises that a bundle may be able to achieve more in terms of service provision for the same price as a series of single routes.**

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

Yes þ No ☐

2.25 **Orkney Islands Council recognises the value of maintaining the Northern Isles bundle as at present, whereby there is integration of services between the Scottish Mainland and Orkney and Shetland. There has been growing demand for travel between Orkney and Shetland, and it is believed that the current service provision promotes tourism between the Northern Isles.** This and the three preceding questions do not however take into account the internal/local ferry services operated by local authorities in Scotland. Orkney Islands Council would welcome a discussion on the options for its internal ferry services.

2.26 **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 þ No ☐

2.27 This would seem a sensible approach, providing that reliability, safety, capacity, frequency and price of travel are all clearly defined within the tender specification. **Allowing flexibility will afford operators the opportunity to innovate, and the incentive to maximise passenger and freight carryings, which will be to the benefit of the operator in terms of fare box, the areas served in terms of social and economic mobility, and ultimately the level of subsidy required.** There is a need to achieve consistency with the level of services, and how and what subsidy those services require.

2.28 **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?**

2.29 Highlands and Islands Enterprise's 'Transport Carbon Emissions in the Highlands and Islands' report in 2008[1] reported that ferry services in the region account for 15.7% of CO_2 emissions from transport, compared to 46.9% from car transport and 26.9% for van and HGV vehicles combined. The study also reports that ferry services in the Highlands and Islands account for 5.5% of all CO_2 emissions from UK domestic ferry transport, with 13.2% coming from the rest of Scotland and the remaining 81.3% from the rest of the UK (excluding international ferry services). The amount of CO_2 per head of the population is similar in Orkney and the Western Isles, while in Shetland the amount per head of the population is notably higher. On the whole, the study for HIE found that ferries in particular appear to have higher emission factors per passenger km (over 3.8 times those of aviation) and per tonne km compared to other modes. Given the volume of CO_2 emissions, ferries should clearly be an area to challenge in terms of climate change objectives, however this should be set in the context that direct (total) transport emissions of CO_2 from the HIE area as a whole represent only 1.1% of the total transport emissions of the UK, and as such any achievements in reducing CO_2 for example, will have limited benefits on a national or even regional scale.

2.30 It should be recognised that emissions criteria for vessels will be challenging. Although there are some marine regulations on the fuels (sulphur content etc.) that can be used, most of the marine regulations are for larger engines burning heavy fuel oil, which will not be so applicable to the type of engines used in the vessels under consideration in Scotland, particularly the internal-type services. Relatively young vessels, of perhaps ten years of age, will not necessarily have low emission engines, and it may be inappropriate to stifle competition by excluding or marking-down such operators as part of a tendering exercise, which could perhaps be considered as unfair in procurement terms.

2.31 **The Council would support the development of alternative fuels such as an LNG distribution system, similar to that which has been developed in Norway, and which would have a massive effect on all emissions from vessels, without impacting on journey time.**

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[1] Highlands and Islands Enterprise, August 2008: *Transport Carbon Emissions in the Highlands and Islands: Final Report.* Report to Highlands and Islands Enterprise by AEA Energy and Environment, available at: www.hie.co.uk/Downloads/HIE-transport-related-documents/Transport%20carbon%20emissions%20in%20the%20Highlands%20Islands%20-%20Final%20Report.pdf

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

2.33 **Orkney Islands Council advocates the inclusion of detailed livestock transport arrangements given the importance of the movement of livestock to the County.** In addition, the Council would promote the inclusion of accessibility details (in terms of physical accessibility, affordability, awareness (i.e. information provision), acceptability, and availability (i.e. capacity)), integration with bus/rail and other ferry services (roles and responsibilities), and consultation and engagement (including complaints) procedures.

2.34 **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 þ

2.35 **Fare and tariff levels vary significantly across the ferry services network in Scotland, change is necessary to create fairness and consistency with fares and tariff levels. Different applications of concessionary travel schemes exist across the network, and the national concessionary travel scheme does not apply in a meaningful way on the local ferry networks.** There is inequality between isles' residents who are older, younger or disabled compared to their counterparts in mainland Scotland who are able to travel for free as frequently as they wish by local bus services under the national concessionary travel scheme. Local ferry services that connect remote, generally small isles, to their main administrative centre should be considered as the same as local bus services that connect remote villages and scattered populations with their nearest administrative centre.

2.36 **Equity across Scotland should be the foremost objective of a fares policy for Scottish Ferry Services.** This can be achieved at the same time as having differing fares policies for different types of area and / or service as appropriate. It should be possible to establish compound fares based on a distance basis, as is favoured under the RET-based scheme, together with a fare element based on the type of connection that is being provided; in simple terms whether the service is a local or national ferry service (see answer to Question 1 at 2.2 above).

2.37 This could be supplemented by a scheme of premiums and discounts to reflect specific operations. In addition, an off-peak service for which there is reduced demand compared to peak sailings could offer reduced rates in order to achieve a shift of traffic from peak sailings for example. The system should be designed to minimise empty running and maximise the fare box, which in turn should maximise social and economic mobility.

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

2.39 Given the value of both inbound and outbound passengers, vehicles and freight, the Council would promote affordability of fare levels for all passengers, vehicles and other freight. In addition however, **the Council would support a discount scheme which assists islanders with the financial barrier of connectivity within and between areas.**

2.40 The Council also advocates that discounts be applied in respect to usage, whereby frequent users are offered discounted travel.

2.41 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 þ   different fares policies ☐

2.42 As discussed above, there should be one fares **policy** across Scotland, but this should comprise of elements that vary to meet the needs of the communities served by ferry services.

2.43 This single fares policy should apply to all supported Scottish Ferry Routes, regardless of whether these are supported by the Scottish Government or by local authorities. The objective is to ensure consistency and affordability for all users on all ferry routes which factors in the needs of island communities (as stated in questions 11 & 12).

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

Yes þ   No ☐

2.45 This should be on the basis of the community that is being served, and therefore what its requirements are for transport connections. Such a method would seek to ensure that some connections are not over-provided for at the cost of other connections which are poorly served, or not served at all.

2.46 There should be a methodology in place to determine when a market failure occurs, and thereby when a subsidy may be required, and what the minimum level of service should be in this case. Equally, there should be a clear methodology in place to guide decisions on when subsidy should be removed as a result of a route becoming commercial, or a commercial operator becoming interested in a route. Procedures should be in place to deal with any intermediate periods in a shift from private to public and from public to private operation of a connection.

2.47 It is apparent that fundamental to the success of any such policies and procedures on deciding which ferry services should be funded is a thorough and consistent approach to assessing the community need for a ferry service, and specifically the service characteristics to meet that need (for example, economies of growth and protecting areas of decline etc.).

2.48 The Council is disappointed that the final work package report "Report on Routes, Services and Integration" was published late onto the consultation period., The Council is broadly supportive of the methodology set out for identifying gaps in current service levels and hence prioritising future spending, though is disappointed at some of the detail within the methodology.

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

Yes þ   No ☐

2.50 **It is not possible to design services around just one need, but rather a service specification is an optimisation exercise of compromise around competing needs and stakeholder wishes.** The most important element of this optimisation however is the prioritisation of needs, such that the most important needs are brought to the fore in terms of planning.

2.51 The broad methodology set out for determining routes and services is reasonable and appropriate. The challenge in undertaking this will be in fairly and consistently defining needs of areas relative to one another. It will be important to use a sound, transparent and evidence-based approach to the needs assessment.

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

2.53 Orkney Islands Council is disappointed that the Routes, Services and Integration Report was published so late during the consultation period, and that stakeholders' attention was not immediately drawn to the publication. The Council is further disappointed that individual data sheets for Orkney were not initially available. The information sheets eventually published are not aggregated to individual route level. **From the analysis undertaken the report fails to identify variations in the nature and therefore need of the isle communities across Orkney.** The Government has provided information for isle groupings such as the small isles of Canna and Muck etc. Information should be made available for each of Orkney's internal ferry routes.

2.54 The Council will be happy to supply more detailed and specific comments and corrections in respect to the Orkney fact sheets that have been supplied.

2.55 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 þ   AND   No þ

2.56 **The first priority should be to provide a consistent level of service provision to Scotland's islands and peninsular communities.** Investment should be in accordance with the Purpose of Government and in accordance with the NTS. It is essential that the entire network is brought up to a common standard based on a systematic and transparent assessment of community need, identifying and addressing gaps identified across the network. Filling these network gaps should be the first priority, which will in itself address inconsistencies in services levels, fares etc. across Scotland. It should then follow that investment should be prioritised to those areas that have the greatest potential to contribute to Scotland's growth in keeping with the Government's Economic Strategy.

2.57 Orkney Islands Council has completed a STAG Study and submitted the subsequent 'do minimum' programme for ferry and terminal replacement to the Scottish Government to bring Orkney's internal ferry service up to a consistent level of service. Subject to Scottish Government funding, this programme is intended to deliver a more consistent service throughout the Orkney Islands.

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

Yes þ   No ☐

2.59 **Orkney Islands Council is one of a few operators to use EU B (old MCA Class 2A) ferries on its internal services. These services have historically not received the same support as those that are directly funded (and procured) by Government. Orkney Islands Council has carried the financial burden of operating costs rising above income from Government support and fares associated with the provision of these ferry services.**

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

Yes þ   No ☐

2.61 Orkney Islands Council believes that there are benefits in devolving responsibility to the local level. The Council believes that consistency should apply towards the funding of and future investment in vessels, piers and harbour infrastructure.

2.62 **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 þ

2.63 **Orkney Islands Council would recommend that the Government address the current anomaly and provide sufficient funding to operate ferry services within the Orkney Islands. Failing this, the Council would wish to transfer responsibility for ferry services operating in open water.**

2.64 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 þ   No ☐

2.65 This would seem a sensible assumption.

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

Yes ☐   No ☐

2.67 Orkney Islands Council believes that Local Government is best placed to understand the needs of the community it serves and as such should be key stakeholders in determining the **provision** of ferry services. If the Scottish Government's intention is to establish consistency in the provision of ferry services across Scotland, **and subject to the provision of adequate funding to deliver these services, then local Government would be the most appropriate body to provide local services.**

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

Yes ☐   No þ

2.69 Orkney Islands Council would not be supportive of the Regional Transport Partnerships (RTP) playing 'the key' role in procurement of ferry services, be they mainland Scotland to Orkney or the current internal services. Although the Council welcomes and values its involvement with the Regional Transport Partnerships (HiTRANS, NesTRANS and Zetrans), **it does not believe there is any value added in the Partnerships taking on a procurement role.**

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

2.71 Orkney Islands Council recognises the value of the RTPs current role in offering a liaison / facilitation function to Local Authorities and users of services to discuss needs of the respective communities, and to assist in the suggestion of changes to services, including on cross boundary ferry services (e.g. Shetland-Orkney-Aberdeen etc). The current arrangements of Ferry Consultative Committees have worked well to this point.

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

Yes þ   No ☐

2.73 Orkney Islands Council advocates that the inequality within the current *split* should be addressed.

2.74 The Council supports dividing the provision of ferry services between Local and Scottish Government, but again reiterates that the current division is inconsistent, as the Consultation Document clearly also acknowledges. **Any division should treat all Local Authorities fairly.**

2.75 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?

2.76 Orkney Islands Council believes that the '*provision of ferry services*' is a joint responsibility that should be shared and split consistently between Local Governments and National Government. Subsidies **should be appropriate based on a minimum service level, on the needs of each community, and reflecting the type of operation that is necessitated by the operating environment.**

2.77 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 þ

2.78 Local Authorities are also experienced in procurement processes, and have their own expertise. There may however be some benefits in having a central resource providing advice on matters such as EU Internal Market Services requirement / procurement; Cabotage requirements.

2.79 Orkney Islands Council acknowledges that there may be cost advantages in the joint procurement of new vessels however **the design of any vessel must be suitable for the waters it operates in and meets the needs of the community.**

2.80 Consultation Question 28: (a) Do you think that recommendations A – G (see below) should be implemented now?

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

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

Yes ☐   No þ Not possible in their entirety

2.81   Orkney Islands Council aims to provide services which satisfy the needs and expectations of as many users as possible, and expects the same to be true of the external ferry service providers. All new vessels and infrastructure should incorporate these recommendations.

2.82   Consultation Question 28: (b) When tendering do you think these recommendations should be included in any future tender requirements?

Yes þ   No ☐

2.83   Accessibility improvements (physical and otherwise) are essential in meeting the needs of the communities served by ferry services, in order to reduce social exclusion and improve social and economic opportunities. The Orkney Population Change Study undertaken for Orkney Islands Council in 2009[2] reported that together with an overall population increase of 3.1% between 2001 and 2007, the largest increase in population is in the proportion aged over 55. A recent housing needs survey carried out in Orkney shows a high proportion of elderly households living in the Outer Isles; particularly Eday, Sanday, Stronsay and North Ronaldsay.

2.84   In order to formalise arrangements and improve facilities for people who have disabilities, (including, those persons who are older or have other identifiable needs, e.g. people travelling with luggage or with small children,) it is important that details are included in the tendering / service specification. This makes good social and economic sense and is on many occasions a requirement of legislation.

2.85   Consultation Question 28: (c) Are there any of these recommendations that you consider to be of particular importance?

2.86   Aspects A-F are of equally high importance.

2.87   Consultation Question 28: (d) Are there other issues that should be addressed?

Yes þ   No ☐

2.88   Accessible information as well as accessibility information should be readily available. Affordability is an important part of accessibility. The community of people who are older and people who are disabled have a high prevalence of low incomes and social and economic deprivation. It is therefore important that there is a consistent and appropriate concessionary travel policy for all ferry services in Scotland, that reflects the way in which ferry services function within communities,

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[2] Orkney Islands Council, April 2009: *Orkney Population Change Study.* Undertaken by Hall Aitken for Orkney Islands Council. Available at:
www.orkney.gov.uk/media/v3/publications/Orkney_Population_Change_Study_April_09.pdf

2.89 Different applications of concessionary travel schemes exist across the network, and the national concessionary travel scheme does not apply in a meaningful way on the local ferry networks. There is inequality between isles' residents who are older, younger or disabled compared to their counterparts in mainland Scotland who are able to travel at no cost as frequently as they wish using bus services under the national concessionary travel scheme. In essence, the emphasis should be on equality and dignity.

2.90 The National Concessionary Travel Scheme accounts for eight per cent of the Scottish Transport Budget in 2009/10, although the scheme primarily benefits those living in the most urban areas of Scotland, where there is a good availability of bus services. The Council would advocate extending the national concessionary travel scheme to local ferry networks.

2.91 Consultation Question 29: (a) Do you think that an Accessibility Improvement Fund should be set up?

Yes ☑   No ☐

2.92 Orkney Islands Council would welcome the creation of a short-term Accessibility Improvement Fund that could be administered in a similar way to the Department for Transport/Transport Scotland Access for All Fund to 2014 in order to bring all current infrastructure/facilities up to an acceptable minimum standard.

2.93 The Government should be minded that with future cuts in public spending, local authorities may be unable to provide match funding.

2.94 Consultation Question 29: (b) How would this be funded?

2.95 Funding for an Access for All Fund should come in addition to exist funding, and should be a priority of Government to ensure fair access right across the network. Such a development should be promoted in advance of other initiatives, such as an RET pilot for example.

2.96 Consultation Question 29: (c) Who would administer this fund?

2.97 Transport Scotland may be an appropriate body for administering such a scheme given their experience of the Access for All Fund for rail stations.

2.98 Consultation Question 30: (a) Do you think that an information system indicating the degree of accessibility would be useful?

Yes ☑   No ☐

2.99 Consultation Question 30: (b) Are there any particular aspects you would like to see considered?

2.100 The scheme may need to be mandatory in order to ensure coverage of the ferry services network. Information on the scheme should be made available on the internet, in timetable and other company information/promotion, on the ferry and at piers and harbours.

2.101 The Council would support a scheme that summarises the accessibility characteristics of a given service, rather than a scheme that awards a star-grading, which would not recognise the specific accessibility detail.

2.102 Consultation Question 31: How could the reduction of CO2 emissions from ferries be delivered to assist in meeting the potential emissions reductions set out in the Climate Change Delivery Plan?

2.103 Encouragement should be given, along with support for funding etc. to encourage the development of vessels operating using alternative lower carbon fuels. Research should be encouraged to develop more efficient ferry designs which reduce fuel consumption. .

2.104 Refer to response to Question 9 at 2.31 regarding LNG.

2.105 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?

2.106 Voluntary implementation is unlikely to take place with unproven technology and without sound evidence that any investment would have a suitable pay back period.

2.107 Consultation Question 33: Would passengers support longer journey times as part of a CO2 emissions reduction programme? If not, can they provide suggestions for alternate methods of delivering CO2 reductions from ferries?

2.108 Orkney Islands Council does not support longer journey times for ferry users, even if it was as part of a measure to reduce CO2 emissions. Residents on island communities already have long and often uncomfortable sea journeys. These ferry journeys are only part of their travel and result in lengthy waits to tie in with other modes of public transport. Interchange penalties for ferry services, particularly in Scotland's most remote communities are already very high.

APPENDIX A RESPONDENT INFORMATION FORM: SCOTTISH FERRIES REVIEW

<u>Please note</u> that this form **mus**t be completed and returned with your response to ensure that we handle your response appropriately. Thank you for your help.

Name/Organisation: Orkney Islands Council

Postal Address: Council Offices, School Place, Kirkwall, Orkney
    Post Code   KW15 1NY

    Phone number   01856 87 3535

    Email address   <u>chief.executive@orkney.gov.uk</u>

3. Are you responding: (please check one box)
(a) As an individual ☐ go to Q3a   (b) On behalf of a group/organisation þ 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   þ   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   þ
                                                    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   þ   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   þ   No   ☐