



## **TRANSPORT SCOTLAND DRAFT FERRIES PLAN 2012**

### **CONSULTATION RESPONSE**

#### **Introduction**

The Scottish Crofting Federation (SCF) welcomes the opportunity to contribute to the above consultation.

SCF is the only non-governmental organisation representing crofters and crofting. There are approximately 18,000 crofts of which just under half are in the four main island groups (Shetland, Orkney, the Outer Hebrides and the Argyll Islands). It is therefore evident that ferry services are of fundamental importance to the people represented by SCF. Crofters in Ardnamurchan, although nominally on the mainland, are also highly dependent on the Corran Ferry and on their links with Mull.

Affordable, reliable ferry services are probably the single most important factor in maintaining functioning economies and viable populations in the islands of Scotland. The sustainability of livestock production in the islands, and in remote mainland peninsulas, with its recognised social, economic and environmental benefits, is absolutely dependent in terms of costs and logistics on ferry services.

#### **General comments**

Following the extensive consultation carried out by the Scottish Government, and the inquiry by the Parliamentary Committee on Transport, Infrastructure and Climate Change, the contents of the Draft Ferries Plan come as a great disappointment.

There are a few interesting and positive developments on offer, but these are far outweighed by the general tenor of the document, revealing, in many cases, a reluctance to provide any more than a minimal level of service to communities already struggling to survive.

The Draft Plan represents an Edinburgh-centred view of the Highlands and Islands. It reveals a lamentable ignorance of the realities of life and work in Scotland's islands and remote mainland areas, and even of the most basic geography of the region. The assumption appears to be that the only important traffic flows are to / from the central belt and / or Inverness.

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However, connectivity within the region is just as important as travel to and from, if local businesses are to have the opportunity to develop and contribute to economic growth. This is especially so in the case of tourism (see our remarks below on Mull / Ardnamurchan and Skye / Small Isles), but also in the case of agriculture, where a remote mainland crofting community would be deprived of access to its abattoir service should these proposals become reality.

The importance of interconnectivity within the region has been proved beyond doubt by the success of the vehicle ferries introduced on the Sound of Harris and Sound of Barra within the last fifteen years. These have stimulated tourism, and have allowed island-based businesses to trade throughout the Outer Hebrides chain.

As we approach further constitutional change, Scotland's islands and remote mainland communities need to be seen as an integral part of the nation rather than as a peripheral nuisance. This Ferries Plan leads us to the disconcerting conclusion that we are viewed as the latter.

### **Road Equivalent Tariff**

For at least sixty years, the level of freight charges to and from Scotland's islands has been identified as the main constraint to their economic development. Where RET has been piloted it has brought short-lived relief from these impositions, but that lifeline is to be snatched away. It is alleged that haulage companies have not passed on the savings to their customers. This may or may not be so, but we cannot know how much freight charges would have increased without RET, given the effects of road fuel monopoly pricing in the Highlands and islands, and other cost pressures. The point is that RET partially leveled the playing field and offered some hope, and that hope is to be cruelly and cynically dashed.

It is particularly galling that routes which would be on the verge of benefitting from RET are now proposed to become passenger only.

There is no indication of how commercial vehicle discounts might be applied in future. For example, and of most importance to our members, the concession that has for many years applied to vehicles conveying animal feed or livestock was given in addition to RET. When the RET pilot was introduced in 2008 we researched the possible effect of the proposals on existing agricultural concessions and found the following: -

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**RET Effect on Existing Agricultural Concessions (2008 situation)**

The current return fare Oban / Barra for a 19m artic is £1200. The hay or livestock concession would reduce that to £600.

Using CalMac's formula for calculating commercial rates under RET (£20 + 18p per lane metre per mile) the vehicle would be charged £324.38 each way (£20 + 18p x 19m x 89miles) or £648.76 in total, a fare increase of £48.76 under RET.

A crofter using his/her own vehicle and trailer can pay per head of stock rather than per metre for the trailer. The towing vehicle is charged at the normal rate and the trailer is free when empty. If the crofter can arrange for a vehicle to haul the trailer off the vessel on the mainland side, the trailer can be 'dropped' on board and only the headage fare is due. Current headage fares are: - £39.75 per bull, £20.95 per cow, £12.75 per calf under six months and £4.10 per sheep. (Headage fares are only available on Oban to Barra/S.Uist/Coll/Tiree.)

Thus if one tup is sent from the mainland in a dropped trailer it only costs £4.10. If the trailer were charged per metre both ways it would cost £58.40 (under RET). If CalMac at some time refused to accept dropped trailers this would increase to £116.80. This assumes trailers being charged on the same basis as cars and is calculated at 60p x 89 miles + £5.

A letter sent at the time to the then Transport Minister, Stewart Stevenson, is attached as an appendix. In the event the agricultural concessions continued to apply in addition to RET. There is no indication in the current consultation what, if any, agricultural concession will apply in future. The loss of commercial vehicle RET and the uncertainty over replacement concessionary schemes is a bitter blow to livestock production in Scotland's islands, just as improving prices for store lambs and cattle were bringing a cautious optimism to island agriculture.

Our comments on individual proposals are as below.

**Mull and Ardnamurchan**

The proposals here assume that the only important traffic flow is that between Oban and Mull. There is considerable social and economic synergy between Mull and Ardnamurchan, the latter virtually an island itself and highly dependent on the Corran ferry. For most of the peninsula, the most accessible facilities are on Mull. Yet the draft plan threatens the removal of direct links from Morvern and Ardnamurchan to Mull, and to direct all vehicle traffic via Oban, a journey of over one hundred road miles involving two ferries<sup>1</sup>. This proposal would be particularly damaging for agriculture as it would deprive crofters and farmers in Ardnamurchan of access to their abattoir service in Mull. The nearest alternative abattoir is 136 miles away in Dingwall. The downgrading of the Kilchoan service and "review" of the

<sup>1</sup> Based on a journey from west Ardnamurchan to Tobermory.

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Lochaline - Fishinish ferry would remove direct access from Mull to the north, depriving a large area on the mainland side of important tourist traffic. Transport Scotland states that the Kilchoan service is not well used. We would say that 5000 – 6000 vehicle crossings per year represents a very healthy level of usage in such a remote area. Is a road journey of 110 miles, mainly on tortuous single-track roads, plus two expensive ferry crossings, considered an acceptable alternative to 30 minutes on a direct ferry?

### **Coll and Tiree**

Our branch in Tiree commented, "We would fully endorse the Review's observation that Tiree needs a more frequent ferry service in the winter. This could be achieved even this coming winter by linking the island with Barra on Fridays from Oban as happens on Thursdays during the Summer Schedule.

"As has been said so often these past weeks, RET must be re-introduced on HGVs otherwise crofting will cease to exist (to a large extent) on Tiree, as feeding costs will be so high that it will no longer be profitable rearing stock."

The branch also pointed out the importance of retaining the headage payment option for livestock, and the facility to "drop" trailers aboard the vessel. (See text box above.)

### **Skye and the Small Isles**

The Armadale – Mallaig service is of more importance than is stated in the Draft Plan, and not just for tourism. The expansion of Sabhal Mor Ostaig, as well as a number of community-driven enterprises in Sleat have made this a growth area in the west Highlands. Local connectivity between Sleat, the Mallaig peninsula, Knoydart and the Small Isles could link and build upon a number of positive developments in the area, such as the revitalised community on Eigg and current community-led development on Rum.

It is therefore disappointing that the Draft Plan should propose a reversion to a passenger and loose freight service for the Small Isles (described as an 'upgrade' but actually a reversal of the progress, and public investment, made over the last 20 years). A once-weekly ro-ro service is not likely to provide for the islands' needs, especially during the livestock sales season. In any event, can the islands' new slipways, designed for stern-loading ro-ro, be used by a passenger / loose freight vessel and where is there such a vessel? Does the *Lochmor* still exist and what will you do with the *Loch Nevis*?

A Lochboisdale – Mallaig service (see below) could have the added advantage of increasing the Armadale – Mallaig winter service, currently only two sailings per day.

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### **Islay and Jura**

The proposal to allow free travel from Jura to Islay as part of a through mainland journey is welcome as far as it goes. However the Scottish Government has removed all bridge tolls, and short crossings such as that to Jura are equivalent to a bridge. Fairness and consistency would require all short ferry crossings to be free of charge.

### **Colonsay**

A year-round, six day a week service will be very welcome for all islands that currently do not have a daily service.

### **Kintyre**

The peninsula is served by one of Scotland's worst trunk roads and a ferry service would be highly beneficial.

### **Western Isles**

The commitment to a winter service for Barra of at least five sailings per week is very welcome.

It will never be satisfactory to serve Uist and Barra by a triangular route due to unacceptable journey times, regardless of the mainland port. The Lochmaddy route involves excessive road mileage, both on-island and on the mainland, for South Uist. Therefore we support the campaign for a Lochboisdale – Mallaig service. This could also improve the winter Mallaig – Armadale service, but must not be delivered at the expense of any other island.

The decision to have a single "super-ferry" on the Stornoway route raises questions over reliability. Obviously the vessel envisaged must be capable of maintaining a service on this very exposed route which currently is highly susceptible to weather-related disruption. It will need to operate virtually around the clock for most of the week, and there will have to be robust arrangements for planned and unplanned substitution.

The so-called secondary route via Harris is in fact far more reliable at present. For example in January 2012, Stornoway – Ullapool suffered 32 cancellations. The equivalent figure for Uig – Tarbert / Lochmaddy was nil. It is gratifying that this is now recognised in the improved Harris winter service. However, Harris remains without an outward sailing on a Thursday. This is to allow the vessel to be fuelled at Uig, which is a classic example of operational convenience coming before the needs of users.

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**Short Ferry Routes**

We reiterate the point that, following the very welcome abolition of all bridge tolls by the Scottish Government, consistency and fairness demand that charges be removed from short ferry crossings, such as Corran – Ardgour and Port Askaig – Jura, which could be seen as 'bridge equivalent'.

**Scotland and the Baltic - a fares comparison**

Finally, in case anyone thinks RET has resulted in cheap fares: -

A return for two adults and a car Stornoway / Ullapool currently costs £118.60. (RET fare) A crossing of similar length in the Baltic (Sweden – Aland Islands) on the same basis (car plus two adults return) currently costs £41.

We could also compare relative incomes in the respective island groups, but that might be too painful.

DM  
March 2012

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**APPENDIX**

Stewart Stevenson MSP  
Minister for Transport, Infrastructure and Climate Change  
Scottish Government  
St. Andrew's House  
Regent Road  
Edinburgh EH1 3DG

31st March 2008

Dear Minister,

**ROAD EQUIVALENT TARIFF**

Firstly, may I congratulate the Scottish Government on the introduction of the pilot scheme on RET covering all ferry routes to the Outer Hebrides. Affordable, reliable ferry services are the single most important factor in maintaining functioning economies and viable populations in Scotland's islands, and RET will undoubtedly deliver a much needed economic boost to the islands covered by the pilot scheme.

Our only reservation is that it appears that all concessionary fares will be removed by the introduction of RET. This would have serious implications for crofters and farmers in the islands who at present benefit from various concessions which have been negotiated in recognition of the effects of high freight charges on livestock production in such remote areas. Lorries and trailers carrying hay or livestock are not charged for the empty leg of journeys to and from the islands. In addition, on the Oban – Castlebay / Lochboisdale route, crofters can be charged per head of livestock if this results in a lower fare. The following examples illustrate the potential effects.

A crofter using his/her own vehicle and trailer can pay per head of stock rather than per metre for the trailer. The towing vehicle is charged at the normal rate and the trailer is free when empty. Additionally, if the crofter can arrange for a vehicle to haul the trailer off the vessel on the mainland side, the trailer can be 'dropped' on board and only the headage fare is due. Current headage fares are: - £39.75 per bull, £20.95 per cow, £12.75 per calf under six months and £4.10 per sheep. (Headage fares are only available on Oban to Barra/S.Uist/Coll/Tiree.)

Thus if one ram is sent from the mainland to Barra in a dropped trailer it only costs £4.10. If the trailer were charged per metre both ways it would cost £58.40 (using the RET formula). If CalMac at some time in future refused to accept dropped trailers this would increase to £116.80. This assumes trailers being charged on the same basis as cars and is calculated at 60p x 89 miles + £5.

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The hay and livestock empty vehicle concession applies to all island routes. The following is an example: -

The current return fare Oban / Barra for a 19m articulated lorry is £1200, the hay or livestock concession would reduce that to £600.

Using CalMac's formula for calculating commercial rates under RET (£20 + 18p per lane metre per mile) the vehicle would be charged £324.38 each way (£20 + 18p x 19 x 89) or £648.76 in total, a fare increase of £48.76 under RET.

We are sure that these are unintended consequences as it would indeed be ironic if RET resulted in an increase in costs for crofters on one of the most remote islands served by one of Scotland's most expensive ferry routes. If livestock production becomes unviable on these islands, the social, economic and environmental effects will be severe. It would also undermine the Scottish Government's efforts to promote the production of good quality food for local consumption. Far from removing headage fares for livestock we feel these should be extended across the CalMac network, as well as the facility to 'drop' trailers.

We would therefore ask you to examine these potential anomalies of the RET pilot to ensure that no one loses out, and that the scheme does indeed deliver the economic benefits intended.

Yours sincerely,

Patrick Krause  
Chief Executive