

PE1722/Q

Petitioner submission of 17 March 2021

We appreciate the submission from the Minister for Energy, Connectivity and Islands (ECI, 04/03/2021), which conveys information from the six Local Authorities participating in the Islands Strategic Group (ISG) on their approach to parking charges at island lifeline ferry ports. We request that the outstanding returns (Highland Council/Comhairle nan Eilean Siar) are shared when received.

We make the following observations on the Minister's submission:

Overall: this response continues to leave the decision with Local Authorities (and other bodies) as to whether or not they charge for island lifeline ferry port car parks. Our Petition calls for the principle – which the Minister and all parties support – to be established consistently across islands. Our own Council's response illustrates why this is necessary.

Argyll & Bute Council

- The Council's response emphasises its internal review (03/2020) of the Traffic Regulation Order (TRO) which triggered our Petition. We explained in our last submission to the Committee the fundamental failings of this review, including that those responsible for imposing the TRO were in charge of reviewing themselves.
- We appreciate the Council's statement to the Minister that they "have no plans to introduce parking charges at its ferry ports". *However*, this statement is not consistent with the Council's TRO review conclusions, endorsed by its Audit & Scrutiny Committee, which state: "*while car parks are integral components of island lifeline ferry services, whether charges should be imposed should be considered on a case by case basis*".
- **The Council's actions, therefore, including its statement of "no plans", do not give vulnerable island communities the security and equity that our Petition requires. It falls far short of the unambiguous, sound analysis and commitment of Shetland Islands Council.**

Shetland Islands Council – we fully agree with the Minister on the following:

- The Council's analysis is entirely consistent with our Petition. It recognises the higher costs of living for islanders (20-60% above UK average), the direct contribution of transport costs to this problem, and that island ferry port parking charges would exacerbate cost of living challenges and put at risk islands' sustainability. **We have been making these fundamental arguments to the Committee, and through the Committee to the Minister, for nearly two years.**
- The Council's "strong commitment [is] that car parking charges at ferry terminals is not a change they would consider appropriate to recommend to the Council to balance a budget. This reflects their broader commitment to the social and economic wellbeing and sustainability of their islands." **This position articulates precisely the understanding of island communities and commitment to their wellbeing that we have been seeking through our Petition for all island communities, so that we are all treated equitably and fairly rather than**

subjected to a postcode lottery. We rely on the Minister for ECI (or his successor) to follow up with ISG Councils to secure this strong and equitable outcome.

NB, most of the North Ayrshire information is not relevant to our Petition as it concerns *mainland* ferry port parking charges (Ardrossan/Largs). Our Petition addresses *island* lifeline ferry ports, because charges at these facilities damage island communities.

Petitioners' request to the Committee

We greatly appreciate the Committee's consistent pursuit of equity and fairness for our island communities. We stress again that throughout nearly two years of consideration of our Petition, no substantive argument has been raised against it. On the contrary, all members of the Committee and the Minister for ECI have supported the principle.

Despite universal acceptance of our Petition's rightness and fairness, no solution has been achieved. The Minister's submission demonstrates the inconsistent understanding and responses of island councils to the shared challenges for island communities.

Translating the accepted principle of our Petition into *practice* requires shared, unambiguous agreement that car parks at island ferry ports are integral to island lifeline ferry services, and that their operators will not charge **in any circumstances**. We ask the Committee to ensure that this is achieved by either:

- A legally-binding obligation on operators against charging for parking at island lifeline ferry ports;
- OR, sufficient certainty and consistency for islanders across ISG Councils that there is no risk of future parking charges via: a) firm *recognition* that the car parks are integral components of lifeline ferry services; and b) firm *commitment* (not contradicted by other policy statements) *not* to impose charges. We believe this would require another round of engagement with relevant Councils, using Shetland Islands Council's model template.

If neither of these outcomes can be achieved before the current Parliament closes, we ask that the Committee carries forward our Petition to the next Parliament. We are very grateful to the clerks, Chair and Committee members, and the Minister for ECI for all their work on our Petition.