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Public Petitions Committee
Scottish Parliament
Edinburgh, EH99 1SP.**

**DONALD MANFORD (SNP)
Councillor, Barraigh, Bhatersaigh,
Eirisgeigh agus Uibhist a Deas**

14th May 2013

Dear Chris,

Thank you for your correspondence of 8th April 2013 offering the opportunity to comment on the submission by Transport Scotland to Petition PE1472.

In its introductory response Transport Scotland explain that an authority which identifies the need to stipulate a level of air service considered essential for economic and development reasons, is empowered to intervene on market default through PSO. It goes on to assert that provision of such service is a discretionary matter for the relevant local authority.

There appear to be certain contradictions in this reasoning. Where an authority has identified economic or development reasons and stipulated the levels of service necessary to address these problems, and thereafter provides the evidence to the EU, in order to be empowered to intervene in the market place to address these problems. It does seem odd if not irresponsible that the said authority abandons the essential economic and development reasons without any effort to establish if the reasons for the original intervention have been overcome or even addressed.

By asserting it is entirely a discretionary matter, Transport Scotland appears to suggest Single Outcome Agreements between Local Authorities and the Scottish Government are irrelevant.

Transport Scotland response to issue 2. - raised from the committee by referring to local authority responsibility and autonomy in reference to "*jointly agreed set of national and local priorities including the Scottish Government's key strategic objectives*".

The Transport Scotland submission is silent on how the axing of a Life-line service - avoiding any reference to the essential needs for which it was introduced – can contribute to the jointly agreed Scottish

Government key strategic objectives which Transport Scotland highlight.

In point 4. Transport Scotland's response refers to a statement by Cllr Manford relating to evaluation of when a service might be ended.

Mr Manford's comment, in its entirety refers to the need for evaluation in a consistent and transparent manner, establishing if the reasons for original empowerment have been overcome or addressed.

Point 4 also. Angus MacDonald MSP asked "if there should be a baseline evaluation for PSOs, or in other words, a national standard?"

Transport Scotland directs its answer to stating that they do not consider it would be appropriate to set a national standard for "subsidy" for PSO air routes. The response goes on to explain why a national standard of "subsidy" would be very difficult. The question raised at the committee, whether there should be a standard of application for PSO itself; has not been answered.

The application of national standards is enforced across a large number of services, regardless of the organisation delivering the service. It seems extraordinary if it would be considered too difficult for air services. There are national road audits, with the aim of equalising road standards; there is a ferries plan which aims to deliver equity of provision and standards throughout the country. It is surprising if Transport Scotland would not wish on behalf of government, to be in a position to advise on similar equality of provision and standards for air services, indeed all transport matters for all the country's citizens.

Life-line, guidelines already exist to provide a balance on the practicality of surface transport for time and frequency of access to centres for goods and services and particularly centres of administration. Single Outcome Agreements are designed to address the same principle but now perhaps they need better focus.

It is strikingly absurd that residents of Barra and Vatersay can now access the country's national parliament in a third of the time it takes to access the centre for local government.

Yours sincerely

Rae MacKenzie, Gordon Murray, Donald Manford.