

Our Ref: TRANS/3/1/2/PRI
Your Ref:

Date: 16th February 2012

Rail 2014
Transport Scotland
Buchanan House
58 Port Dundas Road
GLASGOW
G4 0LQ

Dear Sir,

Rail 2014 – Public Consultation

Thank you for the opportunity to respond to this consultation. The Council has submitted its main response electronically as requested. However, the questions did not cover a number of points the Council wishes to raise and these are discussed in this letter.

The Council's two main aspirations for rail services are the introduction of a full local service between Edinburgh and Dunbar with a re-opened station at East Linton and the development of a cross city service to enable residents of East Lothian to access employment locations in and to the west of Edinburgh without having to change trains in Edinburgh.

It is the Council's view that a cross-Edinburgh service, in particular at peak times, should be included in the new franchise specification and introduced as soon as possible by the new franchisee, thus meeting one of our main aspirations. Intervention 13 in the Strategic Transport Projects Review lists one of the potential services as "*Edinburgh to Dunbar (as an extension of services from Glasgow and the west of Scotland via the committed Airdrie to Bathgate line)*". The feasibility of this service improvement should be assessed as it has the potential to meet both of our aspirations.

The Council would also like to see all local services between Edinburgh and Dunbar call at the intermediate stations in East Lothian to create a truly local service. The recently introduced services by ScotRail between Edinburgh and Dunbar call at Musselburgh only in each direction. This is welcomed as there are currently no direct public transport connections between Dunbar and the recently opened Queen Margaret University which is located adjacent to Musselburgh station. However, it is a missed opportunity to provide a rail connection between the other stations in East Lothian and Dunbar. Additional calls at intermediate stations by Dunbar services would also assist in reducing pressure on North Berwick services.

I trust the above comments are of assistance and look forward to seeing the outcome of the consultation process in due course.

Yours faithfully,

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Senior Transportation Policy Officer

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Respondent Information Form and Questions

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

East Lothian Council

Title Mr Ms ☐ Mrs ☐ Miss ☐ Dr ☐ *Please tick as appropriate*

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3. Permissions - I am responding as...

Individual

☐

/ Group/Organisation

Please tick as appropriate

- (a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate ☐ Yes ☐ No

- (b) Where confidentiality is not requested, we will make your responses available to the

- (c) 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 web site).

Are you content for your **response** to be made available?

public on the following basis Please tick ONE of the following boxes Yes, make my response, name and address all available <input type="checkbox"/> or Yes, make my response available, but not my name and address <input type="checkbox"/> or Yes, make my response and name available, but not my address <input type="checkbox"/>	Please tick as appropriate Yes <input type="checkbox"/> No <input type="checkbox"/>
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(d) 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? Please tick as appropriate Yes <input type="checkbox"/> No <input type="checkbox"/>
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Consultation Questions

The answer boxes will expand as you type.

Procuring rail passenger services

1. What are the merits of offering the ScotRail franchise as a dual focus franchise and what services should be covered by the economic rail element, and what by the social rail element?

Q1 comments:

2. What should be the length of the contract for future franchises, and what factors lead you to this view?

Q2 comments: We are not convinced of the arguments for changing the franchise length. Whilst shorter franchises could test the market more frequently, there will be additional costs for bidders and these will be reflected in the bid values submitted.

3. What risk support mechanism should be reflected within the franchise?

Q3 comments: It is the franchisee's responsibility to collect fares and incentives must be in place to ensure that fares revenue is collected on all services and continues to grow.

4. What, if any, profit share mechanism should apply within the franchise?

Q4 comments: It is not unreasonable for the taxpayer to benefit from a profit-sharing arrangement as a result of wider economic growth. However, such an arrangement should not be structured so as to disincentivise the operator from maximising fares revenue.

5. Under what terms should third parties be involved in the operation of passenger rail services?

Q5 comments: The ability of third parties to promote additional services is to be welcomed. Experience has shown that the modelling of earlier rail schemes has tended to under-estimate future patronage levels. The ability to test a service “in the flesh” is helpful although it may be difficult to introduce significant capital expenditure for a trial service.

6. What is the best way to structure and incentivise the achievement of outcome measures whilst ensuring value for money?

Q6 comments:

7. What level of performance bond and/or parent company guarantees are appropriate?

Q7 comments:

8. What sanctions should be used to ensure the franchisee fulfils its franchise commitments?

Q8 comments:

A similar mechanism as outlined in the response to Q9 could be implemented whereby the franchise length could be reduced if commitments are not fulfilled.

Achieving reliability, performance and service quality

9. Under the franchise, should we incentivise good performance or only penalise poor performance?

Q9 comments:

Ideally, there should be both a mechanism to reward good performance and penalise poor performance. This could take the form of flexibility built into the length of the franchise which could be lengthened or shortened by a specific amount depending on overall performance levels.

10. Should the performance regime be aligned with actual routes or service groups, or should there be one system for the whole of Scotland?

Q10 comments:

There should be one system for the country with punctuality levels based on the length of journey. Shorter commuter services should have a maximum 5 minute delay limit whilst the longer inter-city express services could have a maximum 10 minute delay limit.

11. How can we make the performance regime more aligned with passenger issues?

Q11 comments:

We would support the extension of the delay information to include intermediate stations as this information is just as important for passengers.

12. What should the balance be between journey times and performance?

Q12 comments:

Journey time and performance are both important factors in attracting passengers to use rail services. However, punctuality is vital so that passengers can plan onward connections with some certainty.

Increasing journey times to improve performance conflicts with the Government's strategic objectives.

13. Is a Service Quality Incentive Regime required? And if so should it cover all aspects of stations and service delivery, or just those being managed through the franchise?

Q13 comments:

SQUIRE appears to be well-regarded across the UK so it would be sensible to continue a regime which is widely regarded as good practice.

It would need to be extended if the franchisee were to take over more responsibility for stations etc, as set out in reply to Q26

14. What other mechanisms could be used for assessing train and station quality?

Q14 comments:

Scottish train services

15. Can better use be made of existing train capacity, such as increasing the permitted standing time beyond the limit of 10 minutes or increasing the capacity limit? What is an acceptable limit for standing times on rail services?

Q15 comments:

Standing time must **not** be increased. Passenger requirements are central to Transport Scotland's policy considerations. (para 2.22 of the Rail 2014 consultation document). Increasing standing time would be inconsistent with one of the aims of Transport Scotland's "*Scotland's Railways*", which is to provide journey times and quality of service that are competitive with car and air", (para 2.4 of Rail 2014, 1st bullet). Also, the rail industry continues to put out the message that fare increases are necessary to pay for improved services so it should not now worsen conditions for passengers.

16. Should the number of services making use of interchange stations (both rail to rail and rail to other modes) be increased to reduce the number of direct services? What would be the opportunities and challenges of this?

Q16 comments:

We would prefer to see an increase in direct services, one example being a cross Edinburgh service linking East Lothian with employment opportunities to the west of the city. Also, in order to meet the aims set out in para 2.4 of the consultation document, journeys involving connections should be minimised in order to provide a service which is competitive with car and air.

17. Should Government direct aspects of service provision such as frequency and journey time, or would these be better determined by the franchisee based on customer demand?

Q17 comments:

As the Government is the major funder of rail services, it should provide direction on the pattern of services in conjunction with the Regional Transport Partnerships and Local Authorities. We do not favour a minimum specification and full specification could well limit the ability of the franchisee to develop services so some form of targeted specification would seem appropriate.

18. What level of contract specification should we use the for the next ScotRail franchise?

Q18 comments:

19. How should the contract incentivise the franchisee to be innovative in the provision of services?

Q19 comments:

We would welcome innovation but this must not be to the detriment of the overall passenger experience.

Scottish rail fares

20. What should be the rationale for, and purpose of, our fares policy?

Q20 comments:

The rationale behind the fares policy should be to make the railway as attractive as possible in order to encourage mode shift and to reduce the environmental impacts of motor traffic. All fares should be calculated on a point to point basis so that it is no longer cheaper to buy tickets to and from an intermediate station when making a through journey.

21. What fares should be regulated by government and what should be set on a commercial basis? Do your recommendations change by geographic

area (the Strathclyde area example), or by type of journey (for example suburban or intercity)?

Q21 comments:

The differential between Strathclyde and the rest of Scotland should be removed so that there is one fare structure covering the country. Peak hour fares could be regulated to protect commuters but the franchisee should be given the opportunity to price off-peak fares so as to maximise use of the trains at this time.

22. How should we achieve a balance between the taxpayer subsidy and passenger revenue contributions in funding the Scottish rail network? At what rate should fares be increased, and how feasible would it be to apply higher increases to Sections of the network which have recently been enhanced?

Q22 comments:

Encouraging more use of the railway will generate more income and reduce the level of subsidy required. The economic and social benefits of services need to be examined and related to the level of subsidy. Higher fare increases should only be applied where there has been a substantial service enhancement, eg. the introduction of new trains or a significantly faster service.

The consultation document states that “passenger requirements are central to our policy considerations” (para 2.22) and that Passenger Focus carried out research in 2010 which showed that “value for money of tickets” was the top priority for Scottish (and UK) respondents.

23. What should the difference be between peak and off-peak fares? Will this help encourage people to switch to travelling in the off-peak?

Q23 comments:

The established differential between peak and off-peak fares is well understood and should continue with no shoulder peak fares introduced. Many people have no choice but to travel in the peaks and could be priced off the railway if peak fares are increased disproportionately.

Scottish stations

24. How should we determine what rail stations are required and where, including whether a station should be closed?

Q24 comments:

The provision of stations should be related to the development plan process with new stations located within major developments. If practical, new development could be located close to existing under-used stations in order to

increase patronage. Wherever possible, passengers should be encouraged to use their nearest station rather than drive to a station closer to their destination.

A key development in this area is the potential for a local rail service between Edinburgh, Dunbar and Berwick-upon-Tweed utilising latent capacity on the ECML. There have been a number of studies undertaken in recent years in conjunction with Scottish Borders Council, the Scottish Executive and SEStran and the case for a local service, along with potential new stations at East Linton (East Lothian) and Reston (Eastern Berwickshire) is positive and attracts widespread local and political support. We believe that a stopping service for this part of East Lothian and the Scottish Borders would offer substantial socio-economic benefits for this part of the country and would offer a sustainable alternative for residents to access employment and education opportunities in Edinburgh and elsewhere.

As part of this submission we would highlight the following issues in support of this proposal:

Social Aspects

- The population of East Lothian is projected to grow by 33% between 2008 and 2032;
- The population of Scottish Borders is projected to grow by 16% over a similar timescale;
- The social impacts of improving local services to Dunbar and Berwick with new stations at East Linton and Reston improves connectivity within the Council areas, accessibility to educational establishments such as Queen Margaret University and employment opportunities throughout the region;
- The provision of a new local service will help to address elements of decline, rurality and the marginalisation of parts of East Lothian and the Eastern Borders.

Economic Aspects

- Investment in this local rail service would ease pressure on the A1 and A720 Trunk Road Network and especially the Old Craighall junction;
- A local service could be introduced to Dunbar and Berwick at relatively little capital cost as the infrastructure is largely already in place;
- Improved rail services will increase the market for rail-based tourism in the east of Scotland, benefitting local businesses and creating employment opportunities;
- Additional rail services will provide more sustainable transport for the Edinburgh City Region and provide less strain on the capital's road infrastructure;
- The proposed developments in SESplan's Strategic Development Plan and existing Local Plan allocations in the area need to be factored into the long-term planning of rail services. Failure to do this may result in having to limit development in the area due to capacity issues on the road network.

We would therefore encourage Transport Scotland to include this proposal as part of any future improvements to the Scottish rail network.

25. What are the merits or issues that arise from a third party (such as a local authority or local business) being able to propose, promote and fund a station or service?

Q25 comments:

We would support the potential for third parties to become involved in proposing, promoting and funding new stations and/or services. (see also answer to Q5).

26. Should only one organisation be responsible for the management and maintenance of stations? If this was the franchisee how should that responsibility be structured in terms of leasing, investment, and issues relating to residual capital value?

Q26 comments:

It would probably be better if one organisation had full responsibility for stations and this should be the franchisee as it has the closest contact with passengers and would be the obvious first point of contact for most passengers.

With the exception of Glasgow Central, Edinburgh Waverley and Prestwick Airport stations, all others should be operated by ScotRail. The change of franchise gives an opportunity for Dunbar station to be transferred to ScotRail's operation giving passengers the opportunity to purchase the full range of tickets available elsewhere on the network.

27. How can local communities be encouraged to support their local station?

Q27 comments:

There are many examples of community involvement already which could be used as a model. Supporters of local stations who are prepared to involve themselves with day-to-day maintenance could be rewarded with free tickets or other incentives.

If the question relates to the under-use of a station, then a publicity campaign targeted at local residents could be used highlighting the benefits of using the train and perhaps giving out promotional tickets as an encouragement to try the service.

28. What categories of station should be designated and what facilities should be available at each category of station?

Q28 comments:

There may be a case for introducing new categories of station types as suggested in the consultation document as the existing Network Rail

categories do not accurately reflect some of the existing Scottish stations. There should be an expansion of cycle parking facilities at commuter stations in order to encourage bike/rail commuting and reduce the demand for the transport of bikes.

Cross-border services

29. Should cross-border services continue to go north of Edinburgh? In operating alongside ScotRail services, how do cross-border services benefit passengers and taxpayers? And who should specify these services, the Department of Transport or the Scottish Ministers?

Q29 comments:

Yes. There will always be passengers who appreciate the convenience of being able to make through journeys without having to change trains en route, especially when travelling with heavy luggage. These passengers are likely to see this potential change as a reduction in service and may well change to an alternative mode of travel. One of the benefits of the long distance services is the ability to travel great distances without having to change trains and in addition, the comfort levels and on-train facilities tend to be better on the long distance trains.

Any changes to these cross border services should be agreed between Scottish Ministers and the Department for Transport.

30. Or should the cross-border services terminate at Edinburgh Waverley, allowing opportunities for Scottish connections? And if so, what additional benefits would accrue from having an Edinburgh Hub?

Q30 comments: **If** cross border services terminate at Edinburgh Waverley, there will have to be guaranteed same or cross platform connections into ScotRail services using a similar standard of rolling stock. This could be achieved with wider electrification of the network (see answer to Q31).

Forcing passengers to change trains at Edinburgh Waverley would be inconsistent with one of the aims of Transport Scotland's "*Scotland's Railways*", which is to provide journey times and quality of service that are competitive with car and air". (para 2.4 of Rail 2014, 1st bullet). Increasing journey time would reduce rail's competitiveness with both car and air travel.

Rolling stock

31. What alternative strategies or mechanisms could be used to reduce the cost of the provision of rolling stock?

Q31 comments: A strategic decision should be taken to electrify more of the network in a phased programme to run on after the completion of the Edinburgh to Glasgow Improvement Programme (EGIP). This would retain the expertise of the EGIP electrification team and make the long term planning of replacement rolling stock easier leading to an overall reduction in running

costs. It would also assist in meeting the Government's targets for a Low Carbon Economy as set out in the Climate Change (Scotland) Act 2009.

The route priority for electrification should be Edinburgh/Glasgow to Aberdeen (both routes via Stirling and Fife) followed by Perth to Inverness and finally Aberdeen to Inverness. Rolling stock suitable for longer distance inter-city operations could be ordered in advance of the withdrawal of the diesel stock. There is also the longer term issue of fuel security where electric trains run on home generated power rather than imported oil. This is a once in a generation opportunity for a significant improvement in rail provision in Scotland and should be taken.

In addition, electrification of the lines to Aberdeen and Inverness would influence the choice of rolling stock for the East Coast main Line franchise in that hybrid motive power would no longer be required for trains running north of Edinburgh.

32. What facilities should be present on a train and to what extent should these facilities vary according to the route served?

Q32 comments: The provision of basic facilities such as toilets, adequate luggage space, cycle storage and on-board announcements should be taken as read. If the decision is taken to electrify additional parts of the network as described in Q31, a fleet of electric trains suitable for working these longer distance services can then be procured. Class 170's could then be cascaded from the Edinburgh/Glasgow and other services to the rural lines in the north and west and modified as required to create additional luggage and cycle storage spaces for these predominantly tourist services. There will also be a requirement for on-board catering on the longer distance inter-city services and West Highland and far north lines.

Scotland boasts some of the world's most scenic train journeys so the rolling stock on these lines should be of an appropriate quality to attract tourists and enhance the journey experience.

Passengers – information, security and services

33. How should we prioritise investment for mobile phone provision and / or Wi-Fi type high-bandwidth services?

Q33 comments: Wi-fi capability should be a priority as this can be installed by the train operator and charged for accordingly. As more passengers use and rely on mobile devices, this will come to be seen as a necessity.

34. How should we balance the need for additional seating capacity and retain the flexibility of a franchisee to offer first-class services if commercially viable?

Q34 comments: There will always be a market for first class accommodation, particularly on longer distance services. In order to maximise occupancy, it should be possible for the conductor/guard to sell supplementary tickets to

standard class passengers on the train, perhaps by way of an announcement once the journey has started.

It is our view that shorter, commuter based services should be standard class only and where feasible, existing first class compartment should be converted to cycle storage as was done on the award winning Class 322 units serving North Berwick prior to the introduction of the Class 380's.

35. What issues and evidence should be considered prior to determining whether or not to ban the consumption of alcohol on trains?

Q35 comments: It would be seen as retrograde step by many passengers to have a complete ban on alcohol. With the improvements in communications, it should be possible for the on-train staff to call for assistance from the BTP at the next available station to deal with any anti-social behaviour issues that arise.

What would happen in the dining car of a cross-border service as it crossed into Scotland? Would passengers have to drink up before reaching the border?

36. How can the provision of travel information for passengers be further improved?

Q36 comments: There is currently a wide range of information available for passengers using a variety of media both on and off-station. As para 10.30 states, it is when things go wrong that information is often not forthcoming and procedures need to be developed to overcome this. If they are not already issued with them, conductors/guards should be issued with smartphones so that they can pick up the latest information and relay this to passengers as quickly as possible. Inter-operator co-operation is essential at times of service disruption to enable passengers to travel on other TOC's services at no additional expense to them. Passengers should not be de-trained at stations without any means of onward travel being provided as has happened at Drem recently.

Caledonian Sleeper

37. Should we continue to specify sleeper services, or should this be a purely commercial matter for a train operating company?

Q37 comments:

38. Should the Caledonian Sleeper services be contracted for separately from the main ScotRail franchise? Or should it be an option for within the main ScotRail franchise?

Q38 comments: There is obviously a demand for a sleeper service but it may be better if it was let as a separate franchise in order to better develop the business. The potential for a single sleeper operator for the UK ("Rail

Sleepers UK”) should be investigated as this may bring economies of scale in operation and open up new destinations.

39. We would be interested in your views in the level and type of service that the Caledonian Sleeper Services should provide. Including:

- What is the appeal of the Caledonian Sleeper Service, and if there were more early and late trains would the appeal of the sleeper services change?
- What is the value of sleeper services to Fort William, Inverness and Aberdeen and are these the correct destinations, for example would Oban provide better connectivity?
- What facilities should the sleeper services provide and would you pay more for better facilities?

Q39 comments: There is a case for some market research to be carried out to obtain the views of existing and potential sleeper passengers on the service. It could be that there is a better business case to run services to alternative destinations than at present and this needs to be determined before the franchise is let.

Why is London the only destination in England? The market for alternative destinations in England should also be assessed, eg. summer weekend services to the West Country.

In view of the funding recently committed by the Scottish and UK governments for improvements to the sleeper service, it is all the more important that this is used in the most effective manner.

Environmental issues

40. What environmental key performance indicators should we consider for inclusion in the franchise agreement or the High Level Output Specification?

Q40 comments: One KPI should be the percentage of the network that is electrified. The implementation of this target should be tied in with the rolling stock replacement programme to maximise the use of electric traction. A linked indicator should also be to monitor carbon emissions to determine whether carbon reduction targets are being met. (see also response to Q31) KPI's for waste reduction, biodiversity and sustainability should also be set.