Dear Sharon,

**SAYLSA response to Transport Scotland's Consultation on Station Car Parking**

Further to Transport Scotland's invitation to invite consultation on station car parking I have pleasure in submitting SAYLSA’s response to this matter.

Please note we were unable to find the Respondent Information Form attached to the electronic consultation invite, but as in previous consultation we are happy for our response to be made public.

As in previous responses we will be limiting our response to those areas directly affecting users of the line between Stranraer and Ayr and thus comments are restricted to those stations served by the line namely Stranraer, Barrhill, Girvan, Maybole and Ayr.

With respect to the questions raised in Annexe B I attach our organisations comments.

25th September 2009

Associate Members of the Association of Community Rail Partnerships (ACorp)

The Stranraer to Ayr Line Support Association (SAYLSA) is a charity registered in Scotland, No: SC 039478
**Suppressed demand**

1. **Does further expansion of car parking provision in effect just service suppressed demand?**

   In respect of stations at Maybole, Girvan and Barrhill the position is mixed.

   (a) Maybole has a limited number of spaces (approximately 8) and attempts to park at the station off peak are “a hit and miss affair”. The parking appears as much used by visitors to the local shop and Network Rail employees as it does rail users. Close by there is free on street parking in Greenside and this may well influence both the availability and take up of car parking space at the station.

   (b) Girvan has considerably more car park spaces but very few of these are used. Specific events may cause capacity to be reached but in the main only 3 or 4 spaces are occupied on a regular basis. It is interesting to note that at weekends one pace is invariably filled by the local authority’s road sweeper, reducing the capacity of the car park.

   (c) Barrhill has no car park at all save for two spaces: one space is for mobility impaired drivers and the other used by whichever member of Network Rail staff is on duty at the time. The lack of car parking is a major source of irritation for locals and those wishing to use the train from the Machars, for which Barrhill is the railhead.

   At Ayr and Stranraer the situations are not only totally different from the others on the line but share no similarity with each other.

   (d) Ayr station is a very busy commuter station and off peak parking is difficult. Owing to the poor frequency of train service between Kilmarnock and the Stranraer line it is often necessary for SAYLSA officers to drive to Ayr in order to catch a train. Generally this is in the afternoon for evening meetings and evidence over the last two years shows that parking can be very difficult at this time which is just prior to the time commuters returning from Glasgow would be returning home.

   (e) The land upon which Stranraer station is constructed is owned by Stena and also does not have any dedicated parking at all. All parking takes place on “double yellow” lines on the access road but is not known whether this is ships crew or rail passengers. There is also a small piece of rough ground at the west end of the platform. This is also often used as a drop off facility.

2. **Can we then assume that creating more space at a particular time (pre 9am) by pricing interventions will just service ‘pre 9am’ suppressed demand?**

   Passengers who do not currently take their car to the station because of lack of spaces in the peak travel period now would.

   So far as the Stranraer – Ayr line is concerned these assumptions would probably only apply in respect of Ayr station. There are usually some spaces at Ayr station, but these might literally be only a couple. At times people feel

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obligated to park outside of designated bays but not in an inconsiderate or dangerous fashion, which suggests capacity has been reached.

3. It is proposed by Passenger Focus that by showing parking space availability in real time on websites/text services would allow passengers to make informed choices, avoiding use of alternative modes because they think the station car park is full. Is that a realistic option?

This idea is fraught with legal implications and we are surprised it has been suggested. Firstly people will, unless they are making a known regular journey i.e. commuting to work/college, will make their travel arrangements in advance at home. For an ad hoc journey this may well be in the hour or so before they leave. To this extent the suggestion by Passenger Focus has merit, but of course at a busy station like Ayr the availability of car park spaces will invariably have changed between the time the person makes that decision to travel by car to the station and actually arriving there. If passenger Focus are seriously suggesting that upgrades are made by text then this will encourage mobile phone use whilst driving, an illegal activity. The only sensible way to achieve this would be to incorporate the information into satellite navigation systems but could again over time cause drivers to have more accidents as they are distracted by nav messages be they verbal or written. Perhaps only when cars become semi-automated (possibly on insurance, legal and safety grounds) will such devices have more merit.

Station choice

4. Passengers will drive to stations, which aren’t the closest to their home but, which offer greater service frequency.

This is a very real possibility and SAYLSA are concerned that Transport Scotland overlooked this likelihood in the recast of the December 2009 Stranraer to Ayr timetable, which will alienate commuters to destinations north of Ayr who do not wish to arrive at their place of work an hour earlier than they otherwise would wish. Introducing car park charges at stations south of Ayr will merely exacerbate this situation.

5. Passengers chase capacity and service. Does this suggest that there is an element of self-regulation of the balance of parking and service provision? Is an intervention required?

It is virtually impossible to contemplate a scenario where at rail stations capacity is always provided. Particularly busy stations such as Ayr and Kilwinning are in great demand and whilst there is technically space to expand the latter, subject to land ownership issues, there is little scope at the former. In any event unless there is a political directive so to do, the current global downturn and Scotland’s linking to the British economy would suggest that there will be higher priorities for spending than free station car parks and so satisfying demand at busy stations is never likely to be accomplished.

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Overpricing for car parking dissuades people from rail travel

Following simple demand and supply considerations, the pricing of rail fares already acts as rationing: it manages passenger demand against the supply capacity of rail services.

6. How would any additional car parking charges affect this position? Would that discourage passengers from using rail? Currently, we do not understand in any detail the price sensitivity and elasticity of demand around car park charging interventions to maximise capacity in shoulder and off peak times.

The situation with regard to car parking charges is well known to those who have experienced the scenario of commuting in South East England and SAYLSA would, with respect, suggest that Transport Scotland liaise with train operating companies in South East England, ATOC and local authorities to ascertain this position. In Essex for example, a two-tier car park pricing system was introduced in the mid 1990’s with a higher charge being levied before 09:00. However, whilst this might not influence the level of rail commuting to London, it clearly has an impact on commuting to places other than London and of course contra-peak commuting.

At Ayr for example a system that might be of merit is offering a different range of refunds depending upon the destination. Thus to Glasgow no refunds may be given say before 08:43 (the first available train upon which cheaper day returns are valid), but if one was traveling south to Dumfries or Stranraer your car park charge would be refunded.

Any car park charges imposed at stations south of Ayr would clearly discourage rail use and be counter productive, unless of course this was part of an alternative agenda to see the rail line closed.

7. Conversely, how do we stimulate demand if car parks are already full? By creating peak time capacity by pricing do we only tap into suppressed demand? What are the implications building overall demand by crating a peak to off-peak shift?

There are two constraints; one is financial the other is physical. If the Scottish Government were minded to approve the construction of additional car parking at rail stations and make no charge for this, then that may be a realistic option at locations where there was serious road traffic issues on routes into key cities such as Edinburgh or Glasgow.

In general though, SAYLSA do not see this approach being taken. A more realistic option is to look at the logistics industry for guidance. That industry works to a large extent on the hub and spoke principal and could apply with regard to station car parking.

A possibility is to have a high frequency bus/mini-bus service (at least as frequent as the peak time train service) operating on those corridors which research suggests are used by the majority of car users who park at peak times.

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not being used for say 8 – 9 hours or more per day and in this regard is a wasting asset. From a sustainable perspective this is somewhat undesirable and one is minded to a view that a policy of building more capacity and perpetuating the problem is counter productive to the environment.

8. **Would car parking charges be additional, or would these be redeemable against ticket costs? How could this be managed?**

If society is trying to encourage use of public transport where walking and cycling is impractical then car park charges should be redeemable against ticket costs. SAYLSA is of the opinion that there could be a mechanism, which could allow for some charging in a very targeted fashion, and one only has to look at airport car parks to see how this can be introduced.

Where it was decided that some car park users should pay a charge then barriered entry and exit car parks could be constructed. The cost of charging would be linked to the destination and/or time of use, not just use of the facility per se. In that way certain users can be targeted that links in with highway policy for instance. Thus it may be deemed appropriate that a charge is levied for use of Ayr station car park at peak times for journeys to say Glasgow, but not say for travel to Dumfries or Stranraer. The entry ticket would be linked to the rail ticket thus calculating the fare. With sophisticated smart card technology being used abusers of this system would easily be traced.

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**Supply and demand**

9. **How do we bring about a set of circumstances, which create a shift in demand (time or geographic shift)?**

SAYLSA are unsure that what is required is a shift in demand certainly not time demand. Travel times are societal driven and are directly correlated to employers demands. Despite the growth in flexi-time working the majority of employers operate both a 08:00/09:00 to 16:00/17:00 type working day and expect to see their employees. In some instances it is just not practical to work from home. Those that work from home are often distrusted or are accused of skiving even though in some instances home workers are clearly more productive. So we believe that a wholesale shift in commuting times unlikely in the foreseeable future.

Encouraging geographical shift is slightly more complex and concerning. We are unable to see whether the consultation is suggesting that services to more remote places are cut, thus aggregating demand that can be more readily served by modern high frequency services at key focal point locations or whether Transport Scotland is suggesting the opposite. Clearly SAYLSA wish to see improved use of the existing stations on the line and would be strongly opposed by attempts to obligate people to drive to Ayr, which we fear will be a by-product of the 2009 December timetable change.
10. **What, if any, are the implications for timetabling and rail service capacity?**

   There will be little implications to timetabling and rail service capacity unless a conscious decision is made to force demand to shift. Other than normal growth, correlated to economic development, we do not envisage a large-scale increase in demand for rail.

   The only conceivable policy decision that SAYLSA believe may become more likely is road pricing and its inevitable effect on rail demand. Under such circumstances it would be for the Scottish Government to consider the hypothecation of revenues so raised to fund the rail infrastructure projects necessary to deal with such an eventuality.

Yours sincerely,

Richard Carr
Chairman and Co-ordinator SAYLSA