Scotland's Rail Infrastructure Strategy

Consultation response from Transform Scotland

23 February 2017

1. Summary

1.1. Detailed below are a number of key factors which we believe are vital aspects of a strategic approach to creating a railway for Scotland that is fit for purpose in the 21st century:

1. The Scottish Ministers and Transport Scotland must address the fundamental question of the role of the railway in Scotland; specifically: what is the ambition for the railway in the 21st century?

2. Transport spending priorities need to be rebalanced if we are to ensure a modal shift to more sustainable forms of transport.

3. A multi-modal corridor study should have been undertaken before decisions were taken to dual the A9 and A96 roads: this would have ensured that road and rail investments were considered in a unified way. This is well-established best practice and we believe that this should now be carried out before any further work is undertaken on these important corridors.

4. More effective integration of public transport modes is essential to allow true competition with the car. The government holds the levers which will aid the delivery of this objective. All public transport operators will benefit from increased modal share.

5. Perceived safety risks should not be allowed to add yet more cost to the operation of the railway – the train is already a hugely safer form of transport than the car (over 20 times more times likely to be killed travelling by car than by train). Level crossing improvements should be funded from the roads budget.

6. A comprehensive study should be undertaken of all former rail routes to establish the condition and opportunity for re-use for passenger or freight needs. Until this is completed, all former rail routes should be protected.

7. A table of all population centres not currently served by rail should be compiled alongside a survey to identify opportunities for freight.

8. Emissions reductions should principally be targeted across all transport modes as opposed to a specific focus on rail which – in terms of emissions – is already a much more efficient means of transport than road. Planning policies should be used to deter further car-based developments, and demand management measures introduced to reduce emissions from car and lorry transport.

9. More sophisticated rail performance measures should be introduced which better reflect the overall passenger experience and the severity of any disruption to passengers.

10. Tram-train technology should be developed and implemented in Edinburgh and Glasgow to broaden the coverage of the rail networks.

2. Introduction

2.1. We welcome the opportunity to comment in detail on the above consultation and note that views are not sought at this stage on priority investment schemes.

3. Strategic Context

3.1. Before addressing the issues around structure and funding we believe that the Scottish Ministers and Transport Scotland must first address the fundamental question of the role of Scotland's railway in the overall transport mix. In short, what is the ambition for the railway in the 21st century? If Scotland truly aspires to be a modern European country then it must be acknowledged that a symbol of an ambitious modern country is fast, electrified double-track railways connecting its cities. A railway where it is significantly slower to take the train than to drive is neither competitive nor fit for the 21st century. While most similar northern European countries enjoy inter-city routes served by double-track railways, we estimate that around 44% of inter-city routes in Scotland are still single-track.

3.2. When compared to the road network the railway has suffered from years of serious under-investment. If the railway is to play a key role in connecting Scotland's communities and helping to drive economic growth in the cities then this pattern needs to be revised. Capital expenditure has been heavily focussed on new road-building. In stark contrast, those rail improvements that have taken place have primarily been funded through Network Rail's borrowing capacity, which simply adds more cost to the annual operation of the railway.

3.3. The key strategic outcomes as set out in the National Transport Strategy from 2006 are listed as: to improve journey times and connections; to reduce emissions: and to improve quality, accessibility and affordability of the transport network in Scotland. The 2016 Refresh confirmed these key outcomes.

3.4. The consultation also notes the Climate Change Plan and how the Scottish Government will continue to promote strategies to:

- Reduce overall demand for transport;
- Facilitate modal shift to more sustainable forms;
- Decarbonise vehicles (including train rolling stock);
- Make the transport network as efficient as possible.

3.5. Furthermore, the National Planning Framework (2014) states "We want to make rail travel between Scotland's cities quicker than by car and to complete the electrification of the railway lines between the cities".

3.6. Whilst we fully support the main thrust of all these policy documents, the actual policy implementation has failed to deliver these intended policy outcomes:

- There has been a failure to make meaningful progress on decarbonising transport and emissions now represent over a quarter of all emissions;
- Rail fares have increased in real terms while the cost of motoring has reduced;
- Whilst rail use continues to increase, an overall modal shift to public transport has not been achieved, as bus use has severely declined;
- Major road schemes such as the A9 and A96 dualling have been planned and are being implemented in isolation from the parallel rail routes. This is an inefficient means of transport planning and is likely to lead to a modal shift from rail to the car and the lorry and an increase in emissions. In stark contrast, progress on the rail upgrades on these corridors has virtually stalled.

3.7. We will return to a number of these themes in response to the specific questions. However, it appears to us that the key message from the above is that existing strategies are not delivering the intended goals and a new approach to strategic transport planning and implementation is required. We do not believe that the problems lie mainly in the structure of the industry, but rather at a national level where funding priorities have not matched policy intentions. To ensure a modal shift to more sustainable forms of transport, spending priorities need to be re-balanced.

In the following sections, we address the eleven questions set out in the consultation document.

1. Q1. Do you agree with our vision and approach? Will they help us achieve the Scottish Government's purpose of increasing sustainable and economic growth?

1.1. As discussed in the above section on Strategic Context, we fully support the main thrust of existing policy documents. The vision and approach outlined here again confirm those policy objectives, but current investment priorities do not align with the policy objectives.

1.2. For example, faster rail journeys between cities in the north are not being given priority, whilst capital expenditure is focussed on dualling the roads. The correct approach on the A9 and A96 corridors would have been to carry out multi-modal corridor studies so that the investment in the roads could be studied alongside that in the parallel railway. In contrast, £6 billion has been committed to dualling these roads in the absence of a clear commitment for the railway. We note that more recently proposals to extend the Borders Railway and to re-open sections of the Buchan Line are both to be subject to multi-modal studies. We therefore propose that a full multi-modal study should now be undertaken before any further work is progressed on the A9 and A96 roads.

1.3. Value for money for rail travellers has decreased as the real costs of rail travel have increased significantly more than motoring costs.

1.4. Capacity increases can be achieved on the existing rail network with minimal extra land take, thus allowing double-tracking of large sections of single-track railway – especially important on the inter-city routes. In contrast, the dualling of roads involves a land take many times greater than that for rail. Capacity increases on the railway can also be achieved through train lengthening. Whilst the new inter-city trains soon to be introduced by the ScotRail franchise are welcome, it is our view that four- and five-coach trains will soon prove to be inadequate and that train lengthening will be required.

1.5. Turning to more effective integration, we believe that there is a key role for government in helping to deliver this outcome. Government hold the levers which will help to deliver better integration between rail, bus, tram and ferry services – both in terms of physical integration and ticketing integration. The competition with public transport services within Scotland is the private car, and it is clear to us that an integrated public transport network will offer a much more attractive public transport alternative – one from which all public transport operators will benefit. The recent opening of Edinburgh Gateway station provides an excellent example of physical integration between train and tram combined with joint ticketing.

1.6. Finally on this key question we turn to the role of transport in cities and city regions. For our major cities to offer world-class public transport systems, it is essential that all players work together to ensure that all modes are considered to enable delivery of the best transport mix. It appears to us that this has not been the case with the recent City Deals and that this is a missed opportunity. Looking south of the border there is now a clear move towards powerful and properly-funded transport authorities for England's city regions. It is our view that Scotland should now adopt a similar approach. This is particularly so for Edinburgh and Glasgow, where tram and tram-train planning should go hand in hand with heavy rail strategy and public transport integration.

2. Q2. How might we make trade-offs and prioritise between different types of investments, while ensuring that our actions are aligned with our vision?

2.1. Rail transport cannot be considered in isolation from other transport modes and investments. Rail is a key part of the public transport offering and public transport itself competes with the private car. Clearly, there will be a finite capital investment sum for transport. It is then evident that a balance must be struck between capital spent on roads, railways and other transport modes if the government is to achieve its aims and objectives as set out in the document and to which we refer in the Strategic Context section above. We make no excuse for again referencing the current huge imbalance in expenditure planned on the A9 and A96 roads compared to the parallel Highland Main Line and Aberdeen to Inverness railways.

2.2. Another key aspect that should be tackled is the cost of rail improvements. In our view a 'risk averse' approach is driving up the cost of rail improvements – much of this driven by perceived safety risks. It is essential to bear in mind that the train is a hugely safer form of transport than the car (over 20 more times likely to be killed travelling by car than by train[1]), and if excessive costs deter investment in the railway, then it is likely to lead to more people opting to drive. As with capital investment, safety should be viewed across all modes. Those in the railway industry and their regulators are guilty of viewing rail in isolation as opposed to taking a view which takes account of the impact across all modes. As a further example, it is our understanding that the recent cost escalation on the electrification schemes is largely the result of the sacrifice of a derogation from European standards that the UK previously enjoyed. Designs should be appropriate for the UK loading gauge on classic lines; new-build high-speed lines should be considered separately. Such decisions should be challenged as should the increasing propensity to 'gold plate' rail enhancements. The provision of 40 security cameras at Stow station on the Borders Railway, whilst in itself one small example, is indicative of an application of national standards inappropriate to the location.

3. Q3. Do you support the move to a more flexible 'pipeline' approach to scheme delivery, that does not force us to make early decisions on a detailed specification prior to the commencement of the five-year regulatory control period, without receipt of a robust business case?

3.1. We believe that it is essential to take a long-term strategic approach to the development of the railway network. The railway that we have today is largely a mixture of that developed by the early private railway companies and later dramatically reduced by the Beeching era closures. Communities and travel patterns have changed out of all recognition since those days and future planning needs to recognise those changes and plan to create a railway fit for the 21st century.

3.2. We have already referred to the need to create competitive inter-city routes on the existing network; however, expansion of the network is also required to serve the many communities which have grown out of all proportion since the closures. It cannot be right that it is left to local campaigners to lobby for new rail services or routes – a strategic approach which combines local, regional and national needs should be adopted. One of the many lessons to be learned from the new Borders Railway is that communities value new rail links to our cities and the benefits flow both ways. There are a number of other examples of communities which would benefit from such links, where the social benefits should form a key part of the business case: Levenmouth stands out as a very prominent example.

3.3. We suggest that, as a priority, all former rail routes should be protected until a survey has been undertaken to establish the condition and opportunity for re-use. These are national assets and should be viewed as such. At the same time a table of population centres not currently served by rail should be compiled. It is important that Transport Scotland leads on this process and works in cooperation with local authorities and Regional Transport Partnerships. This would then help to create a strategic approach to how and where the rail network will need to be enhanced and enlarged for both passenger and freight needs. In the latter case we suggest that a parallel survey should also be undertaken to identify opportunities for freight, close to or adjacent to the existing railway.

3.4. Turning to funding, it is clear that the current five-year regulatory periods have provided a guaranteed funding stream for rail maintenance and enhancements and this must not be sacrificed by a return to the annual uncertainty that previously existed. If a pipeline approach is linked to a long-term strategic plan and guaranteed funding streams then it will clearly have merits. It is however our view that many of the current problems with schemes stem from a failure to take a long-term and consistent approach to investment. A long-term approach will allow the necessary skills and expertise to be built up and retained within the railway industry, and better designed and more efficient schemes to be delivered.

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[1] Rail Safety and Standards Board (2016) 'Annual Safety Performance Report 2015/16'. Available at <https://www.rssb.co.uk/Library/risk-analysis-and-safety-reporting/2016-07-annual-safety-performance-report-2015-2016.pdf>. See Chart 11.

4. Q4. What are your views on the retention or removal of individual ring-fenced funds?

4.1. Ring-fenced funding can lead to inappropriate schemes being delivered simply because the financial resources are available. An example of this is the lifts and footbridge built outside the main station area at Perth; a more appropriate approach would have been to re-use and enhance existing infrastructure. Other funds such as that for new stations are helping to deliver valuable additions to the network.

4.2. A better way forward may be to create a ring-fenced fund for each control period that is available for enhancements to either the network or to specific schemes – but is not to be used to cover for cost over-runs on existing projects.

5. Q5. What alternative sources of funding could be used to help deliver the rail investment programme?

5.1. We support the position outlined for Scotland whereby a strict requirement for rail enhancements is not placed on third party contributions.

5.2. However, it is well understood that new rail lines and stations can lead to increases in property values of around 20% and so we would suggest that developer contributions should be sought as a condition of planning permissions. This would require a close working relationship between those developing and delivering rail enhancements and the local planning authority. We would note that E-Rail promoted the concept as a means of part-funding the re-opening to passengers of the Edinburgh South Suburban Railway – believing that as much as 50% of the cost could be derived from land value increases. Unfortunately they did not find support for their proposals at either local or national level, which appears to show a failure in joined-up strategic thinking.

5.3. We also note the recent development of City Deals which appear to have proceeded without a strategic approach to planning rail enhancements as part of a package of sustainable transport improvements. Given that these depend on public funds, this should be a further source of funding for the rail investment programme.

6. Q6. Do you agree with our approach to emissions reductions and climate change adaption? What else should be considered?

6.1. As a result of climate change, weather patterns are clearly changing and so we would strongly support the move to make the railway infrastructure more resilient.

6.2. In terms of emissions, we believe that the overall approach to transport investment should be reviewed, as further road-building and plans to reduce the rates of Air Passenger Duty (APD) will further increase emissions from transport. The government's declared ambition for HS2 rail services is to achieve a three-hour journey time from Central Scotland to London and this will involve significant upgrades to the classic network. A reduction in APD will damage the business case for HS2 services to Scotland as well as leading to a modal shift away from existing Anglo-Scottish rail services – both of which are counteractive to declared policies.

6.3. In general terms rail is far more efficient at carrying large numbers of people and freight, and so prioritising investment in rail on key inter-city corridors and for flows into cities should be a key aspect of any strategy to reduce emissions. A public transport system that integrates rail with bus and tram services and so further encourages the use of public transport will also aid emissions reductions. Further electrification of the rail network will help to reduce emissions from trains, but a specific focus on reducing emissions from trains while failing to effectively tackle those from road transport is not, in our view, an effective strategy. Demand management measures are required to reduce emissions from road transport – both physical and fiscal/pricing. The railways already implement pricing-based demand management; it is bizarre that there is no equivalent, systematic approach to demand management for the road network.

6.4. Finally on this question, we turn to cities themselves and planning policies. As already described, an integrated public transport system will encourage modal shift and so reduce emissions. However, focus should also be placed on active travel, which has the dual benefit of reducing emissions and improving public health; as such, measures to increase active travel should be a key element of national and well as local transport policies – supported by appropriate levels of funding. In terms of planning policies, it is well understand that dispersed development will encourage car-based travel. The current road-building programme will increase car journeys and emissions but a further impact is likely to be the growth of dispersed and out-of town developments: the Aberdeen Western Peripheral Route being a classic example of where we believe this impact will occur.[2] Current planning policies are failing to support the government's targets to reduce emissions.

7. Q7. Do you agree with the proposed approach to specifying performance outputs?

7.1. The Public Performance Measure (PPM) currently adopted has helped to show comparative performance between operators and that in itself should lead to improvements amongst those at the lower end of performance. It is however something of a crude measure and prone to misrepresentation in media and political debate, as so clearly demonstrated in recent coverage of ScotRail's performance. This has served to create a distorted picture in the public's mind as to the true and comparative performance of the railway in Scotland. Focus on single targets such as this can also lead to too much management focus on one issue as opposed to the wider aspects of running the railway.

7.2. We do not believe that the majority of the travelling public are primarily concerned about arrival times to within a few minutes. We consider of far greater concern to be the total cancellation of trains and skip-stopping. In the latter case, passengers at the stations involved are even more frustrated as they see their train pass through but not stopping. Where services run at very frequent intervals a delay or cancellation, whilst inconvenient, may not be too disruptive for passengers.

7.3. However, on routes with hourly, two-hourly, and in some cases up to six-hourly intervals between trains, cancellations can entirely disrupt passengers' days. This is equally the case where onward connections from hub stations such as Inverness or from ferry terminals are missed. We would suggest that in such cases, a form of weighting system is considered to reflect the severity of the disruption to passengers, which is clearly much more in the case of a two-hour wait for the next train than a ten or fifteen minute wait.

7.4. For serious disruption where all trains are cancelled through a line closure then replacement buses will still need to be introduced if no alternative rail diversion is available. For passengers the main issue in such instances is how well the railway performs in keeping them informed and providing alternative transport. The first option should always be to seek a rail alternative either by using a diversionary route or through an arrangement with another rail operator. The railway across the UK has been heavily criticised for the way it deals with such incidents and there is certainly room for improvement, and it may be the case that a specific performance measure could be introduced for such occasions.

7.5. However, it should be remembered – and better promoted – that the railway offers full compensation to passengers for serious delays whereas those travelling by road receive no such compensation when they are delayed.

8. Q8. How should performance be balanced against the wider priorities for reduced journey times and the full utilisation of existing and new capacity?

8.1. We fully support the drive to improve journey times to allow rail to offer competitive journey times to the car. The retention of extra trains in Scotland to allow for additional services under the 'Revolution in Rail' initiative is to be welcomed; the creation of high quality hub interchange stations should be a key element of this initiative.

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[2] The proposal by Aberdeen Football Club to move its stadium to an edge-of-town site is a current high-profile example of the unsustainable car-based sprawl that we expect will follow the completion of this road scheme.

8.2. It is important to remember that the Beeching era closures resulted not only in the loss of railway lines but also station closures on lines that have remained open. In many instances those communities that suffered station closures have now grown substantially and new communities have grown up around existing railway lines. We do not believe that station re-openings and the creation of new stations should be resisted purely on the grounds of insufficient line capacity or extended journey times. New infrastructure may be required in the form of loops or stopping patterns may need to be adjusted. In answer to question 3, we outlined the need to undertake a full study of communities not served by rail to highlight the opportunity to rectify this situation. This will highlight the many large communities on existing routes that are not currently served. Whilst we would not advocate the closure of any existing stations, we would support an amendment in existing stopping patterns to allow large communities to be better served at existing or new stations. The current stopping patterns on the Shotts Line highlight the failure to serve well those communities with most potential whilst attempting to provide an hourly service to all stations. The electrification of this route offers the opportunity for a total recast and upgrade of the timetable.

8.3. Another obvious way to increase capacity is through train lengthening. Where existing platforms are too short we would suggest that selective door opening should be considered for some stations as an alternative to platform lengthening.

9. Q9. Do you have a view on our approach to safety? How can the closure of level crossings be better supported?

9.1. When considering safety on the railway it is important to set this in the context of safety on other modes – in particular, car travel, the main competitor to the train, (see our reference to the RSSB stats under question 2 above). Our railways are already the safest form of surface transport, and the relentless pursuit of yet higher safety standards is likely to further increase costs and make the railway less competitive, sending more people onto the roads. This is surely not the desired outcome of transport policy.

9.2. In terms of level crossing safety it is the case that almost all incidents at level crossings are caused by misuse of the crossing by road users. In these circumstances it does not seem right that the railway should have to fund improvements to level crossings and we would suggest that improvements are funded from the roads budget.

10. Q10. Do you support the proposed approach to innovation and new technologies?

10.1. Innovation and new technologies will both be important tools in the transformation of Scotland's railway from one that in many places is still Victorian in nature to one fit for the 21st century. We fully support the move to smart and integrated ticketing and the introduction of electronic signalling solutions.

10.2. Independently Powered Electric Multiple Units may be appropriate in certain circumstances where full electrification would be prohibitively expensive. However, we do not believe that this should be a substitute for an electrification programme to link Scotland's cities and the full electrification of commuter routes into cities. Hybrid trains such as those currently under construction for the IEP programme are likely to suffer from the need to carry the extra weight of the diesel engines, the lower reliability of more complex trains and lower power when operating in diesel mode.

10.3. At the end of the current franchise many trains in the fleet – especially those operating on the rural and inter-city routes – will be nearing the end of their lives and so it is essential that plans and infrastructure are put in place for their replacements.

11. Q11. Do you have any other views as to how innovation could be better supported through the HLOS process and Network Rail's broader management of the rail infrastructure?

11.1. In 2012 Network Rail consulted on 'Alternative Solutions', a key aspect of which was the development of tram-train technology. This technology has been widely developed in Europe and it would be a serious omission if this was not part of the strategy going forward in Scotland. In Edinburgh, the South Suburban Railway is one where the tram network could be extended to better serve the Capital by rail, and plans for trams in Glasgow present an ideal opportunity to look at the best combinations of light and heavy rail. With the arrival of HS2 trains in Edinburgh and Glasgow in 2026, heavy rail capacity at the terminal stations will be at a premium, and so we believe that alternative rail based options should be explored and implemented. This will require Network Rail and Transport Scotland to work together with Transport for Edinburgh and SPT (or any successor organisations) to deliver the most effective overall solutions.

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Transform Scotland is the national sustainable transport alliance, campaigning for a more sustainable and socially-just transport system. Our membership includes bus, rail and shipping operators; local authorities; national environment and conservation groups; consultancies; and local transport campaigns. Transform Scotland Limited is a registered Scottish charity (SC041516).

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