

CONSULTATION ON SCOTLAND'S RAIL INFRASTRUCTURE STRATEGY - FOFNL RESPONSE

1 Friends of the Far North Line (FoFNL), established in 1994, has over 150 members, including several Community Councils, and supports the railway line from Inverness to Thurso and Wick, both for passengers and freight consigners. This line is dependent on, and integrated with, feeder rail services from Perth and Aberdeen to Inverness and (in the absence of other rail user groups) FoFNL does considerable work in support of these lines also.

2 We welcome the opportunity to contribute to the Consultation; we hope our Response will help the decision-makers in Transport Scotland (TS) to advise Scottish Ministers that relatively small-scale enhancements in rural areas should not be overlooked merely because the populations served are small and dispersed.

3 We note the injunction (on p5) that the Consultation is not about prioritising schemes set out in Network Rail's Scotland Route Study (SRS), but about higher-level principles. That we obey this injunction does not mean that we do not have clear ideas about appropriate schemes for the FNL and elsewhere: we have set these out in other formal Responses, not least in our Response to the SRS made in 2016.

4 Before setting out our responses to the specific Questions posed we shall make comments on various parts of the Consultation Document, asking questions of our own.

5 On p10 much is rightly made of the success - greater than had been forecast - of the Borders Railway. Two points arise. We have commented before, most recently in our Response to the SRS, and before that in our Response to the Scotland Route Utilisation Study a few years ago, that the STAG process seems to us to have an inbuilt bias against small rural schemes. We said then that

"It is widely believed that the STAG process, although useful, contains within it an insidious weighting against rural schemes where the number of passengers benefiting is relatively low. This is not the place to argue for a re-evaluation of the underlying mechanism of STAG - although such a thing would be entirely proper after over a decade of use - but there is a danger because of it that small schemes continually fail to reach even the preliminary stage of proper evaluation."

6 We are not aware that such an appraisal has taken place: surely it is entirely proper that systemic processes which are routinely used to inform policy decisions are revisited periodically. We believe that a revision is overdue, and should be carried out swiftly. Our belief is reinforced by the recent news that passenger numbers on the Borders Line greatly exceed those predicted by the use of a formula. The formula clearly gave the wrong answers about passenger numbers, as was the case with other re-openings in Scotland in the last decade. Furthermore its use played a significant part in the decision to descope the project by removing several miles of planned double track. The frequent poor delivery of the timetable, with stations missed, has demonstrated in the first year the degree to which this decision was flawed. The STAG process must be revisited quickly to discover and correct the hidden weaknesses which led to such miscalculation of passenger numbers

on the Borders Railway. We are conscious that funds will be less readily available in Control Period 6 from April 2019 (CP6) than heretofore, and we wish to avoid any repeat of the short-term descope errors highlighted on the Borders Railway.

7 The second point is that nowhere in the Consultation does there appear to be any process described for examining other re-openings of closed routes. We are aware of the desire to re-open the line to Levenmouth in Fife: where is the mechanism for campaigners seeking this?

8 On p16 are set out the three priorities used in the Strategic Transport Projects Review. We endorse these. However we would draw attention to two omissions. In the second priority ("Promoting whole industry measures ... [making] better use of railway assets") there is no mention of human assets. Many of the problems of maintaining the timetable, particularly on the FNL but, we suspect, also elsewhere in Scotland, arise because of so-called "staff shortages". We question whether the ScotRail Alliance has enough members of staff to do the job, allowing for training, holidays and sickness. Any maintenance engineer knows that more units are required in a fleet than those out in service on any day - does the same thinking carry through to human resources with equal rigour? Should voluntary overtime play as large a part in staffing rotas as it does?

9 The third priority seems to be built on an insecure foundation. Surely before expanding and improving capacity "to support the growth in demand" it should be expanded and improved *to deliver the current timetable*. Our experience on the FNL in recent years has been that the timetable has been adjusted to fit what the capacity of the line can deliver. This puts the cart before the horse. End to end journey times on the FNL have grown incrementally by around 30 minutes since 2000 and there have been several occasions when delivery has been so poor that a timetable more capable of being delivered has been published. That the reasons for these changes - TPWS, new station openings, rolling stock problems - have all been real does not mask the cart-horse interface problem.

10 On p16 the very next paragraph paints a rosy picture of how the Scottish Government will build its strategy for CP6 and beyond. As with all strategies, however, things change following the first encounter with the enemy. Which of the high-level core principles ("improving reliability, reducing crowding, cutting journey times") will be sacrificed, or modified, to ensure delivery of the others - for in the real world they are conflicting if not actually incompatible? We have seen on the FNL that improving reliability has led to a 30-minute *increase* in journey times since 2000.

11 On p17 the second bullet point ("Safety") seeks to "[exploit] opportunities to improve safety at level crossings". The Joint Law Commission Report a few years ago produced a suite of recommendations, including a Draft Bill, but, despite (anecdotally) the DfT being keen, no parliamentary time either at Westminster or Holyrood has been found. As Brexit is likely to put extreme pressure on time at Westminster it behoves the Scottish Parliament to start the process of giving effect to the recommendations by enacting those legislative changes within its power - principally to do with land rights. We accept that rail safety is a reserved matter, but we believe that if Westminster were given a nudge in this way

Parliamentary time could be found. We are not aware of any serious objection to the draft proposals.

12 Later on p17 in a paragraph about the Lamington viaduct we are told that TS will work with NR to improve resilience to weather-related challenges. We believe that "working with" is insufficiently robust, given the RAIB finding that organisational changes within NR, including its evolution from Railtrack, led to many instances of best practice being lost. We learn that scour management has been absent at over 100 locations: what other organisational failings of a similar nature have been discovered?

13 On p25 we learn that the Scottish Government "will continue to explore opportunities for service-based initiatives, such as variations to rolling stock, and/or timetable structures, to improve journey times". This is intriguing - we wonder whether "rolling stock variations" will be interpreted widely. Will it be permitted for the ScotRail Alliance to acquire different, or even new, rolling stock during the current franchise? Would the Vivarail Class 230 development of ex-District Line D78 stock have a place (we think it would)? The Inverness-based Class 158 fleet is in the process of being refurbished to provide the "Tourist Train", but has the development of the Class 230 with its much larger windows and flexible (because effectively new-build above the sole bar) interior fittings overtaken the 158 during this process? Is there a market among wealthy tourists for a quasi-Pullman service (at a suitable price) within one of the 3 cars of a 230? The Royal Highlander service would seem to imply that there is a market for very luxurious rail travel in the Highlands. Has this possibility been explored? We are aware of a suggestion made by HITRANS that using a 230 on the Kyle Line might be a way of overcoming the landslide problem at Stromeferry; we hope that this will be taken seriously and given proper consideration.

14 On the same page the issue of connectivity is raised. Following the ill-judged deregulation of buses in the 1980s a bus has been seen by many (not least the Competition authorities) as operating in competition with a train: not so (the real competition is between train and private car). It is counter-productive to having an integrated transport system if one part of the public transport provision is allowed to act independently of another. This is not the place to advocate re-regulation of the bus industry in Scotland, but until that day comes Scottish Ministers must have the power to compel bus and ferry companies to work together with the rail companies operating in Scotland to seek to provide better connections, and to avoid the nonsense of a bus being timetabled to leave 5 minutes before a train is due to arrive. The structure whereby ferry operators or train operators suffer a financial penalty for delaying a departure to allow a connection must be made more flexible.

15 The issue of innovative rolling stock is picked up again on p27 where Independently Powered Electric Multiple Units (IPEMUs) are mentioned. Presumably this means battery-operated. The trial in East Anglia of such a train seems to have been successful, but we are not aware how far (or how reliably) the trial vehicle can travel without being recharged (nor how long a recharge would take). It is hard to see where an IPEMU might

usefully operate on the Scottish network as there will be relatively few short unelectrified routes once EGIP is concluded (including the extensions in the Glasgow area) in CP5. Were it possible to find a solution whereby a battery-operated IPEMU could travel say 150 miles then such a vehicle would have a use on the Stranraer line, on the GSWR line through Dumfries, on the Borders Railway and perhaps elsewhere. We support research in this area as we believe that the passenger experience is noticeably enhanced by greater comfort within the train, leading to modal shift as the difference in comfort with the private car is thereby reduced.

We now turn to the Questions posed in the Consultation:

Q1 We endorse the approach being suggested. However we feel there is a constant need for the social inclusion aspect of public policy to be remembered. It is all too easy to fall into utilitarian thinking and to overlook that the greatest number have their needs all too easily fulfilled. We believe that the structure of ministerial responsibilities, whereby the Minister for Transport is also Minister for The Islands, is logical and will mean that remote communities (not being islands) will also receive due weight.

Q2 The glib answer is "with difficulty". This question goes to the heart of public policy. Officials advising Ministers operating within tight financial constraints have to make difficult choices (or to present the Minister with a recommendation for a difficult choice). The guiding principle must surely start from utilitarian ideals, but must not stop there. If a group of people - passengers - have received a benefit because they are many in number - a nice new electric train in the Central Belt - then they retreat somewhat in the queue despite still being many in number. The d'Hondt method leaps to mind. Sooner or later even the least get *something*.

Q3 We strongly endorse the move to a "pipeline" approach as we believe it allows a more flexible attitude to new factors presenting themselves during the planning and development phases of a long and complex piece of work. A good example of what goes wrong with too rigid an approach is the GWR electrification project. The wrong trains were ordered because they were ordered too soon in a process which (for many reasons not set forth here) took much longer than was anticipated. A pipeline approach would have been likely to have avoided most, if not all, of the extra costs this rigid approach has occasioned. Provided that care is taken to avoid any clogging of the pipeline we see no downside. Too cautious is as bad as too bold.

Q4 We believe that the ring-fenced funding for stations and for level crossing removal has brought substantial benefits for passengers (and members of the public at level crossings) and we would wish to see these continued. While large stations receive improvements there is a need for minor works at many - most - smaller stations on the network, and a dedicated fund for such works allows them to proceed independently of, and not in competition with, works at large stations. Given the points we have made in paragraphs 13 and 15 above we believe there is an argument in favour of a ring-fenced fund (perhaps of no more than £10 million) for development work on innovative rolling stock issues.

Q5 *Cui bono?* Where there is housing or industrial development there is a strong case that the developer should pay some of the costs of any necessary improvements. Elimination of a level crossing because nearby development increases the traffic movement to such a degree that a bridge is required, surely obliges the developer to make a contribution. However this argument goes only so far. The public funds spent on building dual carriageway along the A9 between Perth and Inverness cannot stand alone: the public purse must pay for any railway doubling on the competing HML. That no developer will wish to contribute towards a major strategic investment should not be a reason for the public purse failing to do so. A distinction must be made between the enhancement of strategic arteries and smaller-scale works where an identifiable beneficiary can be expected to make a contribution. Whether this extends into other parts of the public realm - local authorities or groups like HITRANS - will surely depend on the degree to which funds from such sources will be available, and whether funds would be generated for them by the proposed enhancement. The sensible solution, of course, although probably not open to Scottish Ministers, is to borrow long term on the bond market to fund long lasting infrastructure construction.

Q6 Beyond what the intelligent layman has to offer in this area we have no specific expertise. However we note that achieving modal shift requires a pro-active approach from government. Exhortation will not work while the private car (drawbacks notwithstanding) is so much *nicer* to be in than most trains. The Rail Passengers' Committee for Scotland did some illuminating work on modal shift in 2004 which is still available.

Q7 The only genuine measure of performance output is the percentage of passengers who are completely satisfied with their journey. Measuring this is, of course, impossible not least because it is wholly subjective and my satisfaction with my journey may be affected by the fact that I have a lousy cold and I'm on the way to the office and it's raining. So proxies have to be devised (although satisfaction is measured twice a year by Transport Focus, allowing an observation to be made about whether or not things are generally improving). Delivering the timetable (and by "delivering" we do *not* mean "arriving within 4'59") is very important, but not so important that passengers with a connection are inconvenienced because Train 2 left on time despite Train 1 being 5 minutes late. This is important at all times, but becomes essential where Train 2 is the last train of the day. Thus the "delivering the timetable" proxy has to be devised in a thoughtful way. We are very rarely troubled with passengers standing on the FNL, so our experience in this area is anecdotal.

Where *routine* standing for more than a brief time - 10 to 15 minutes seems reasonable - occurs then something is wrong and steps should be taken to deal with it. Occasional failures to deliver enough seats will usually be down to a rolling stock failure, the solution to which lies in having better rolling stock less prone to failure. We note that the performance of Class 158s on SouthWest Trains in Salisbury is vastly better than the performance of the same class in Scotland. While we accept that the uses are different - fewer hills, fewer stations, all units at home depot every night - we do not believe that this

can account for a factor of over 20 in the miles-per-incident statistics.

Q8 We alluded to this dilemma in paragraph 10 above. While it is undoubtedly better for the published timetable to be reliably delivered (allowing therefore for connections, and for keeping appointments) there has to be a limit to which the timetable can be extended to deliver this laudable outcome. The experience on the FNL is not typical of the Scottish experience, but for passengers in Caithness and Sutherland it is a very real detriment to rail travel. Passenger numbers have fallen over recent years from Wick and Thurso against a background of generally rising ridership in most of Scotland. We believe that the bulk of the falling-away is because the journey time is 30 minutes longer than it was in 2000. We repeat this to illustrate our belief that reduced journey times, while not sufficient on their own to obtain modal shift, are a necessary condition. In a nutshell what needs to be done on the FNL is to bring the infrastructure to a condition which allows the 2000 timetable (as a minimum) to be delivered 92% of the time. We are under an injunction not to proceed too far in this direction in this Response: suffice it to say that the FNL's problems are a microcosm of the problems of the network as a whole. Get the infrastructure up to standard; get the kit right. If you build it, they will come.

Q9 More of the same. The level crossing closure programme has been excellent in CP4 and CP5. The installation of AOCL+B crossings on the FNL and elsewhere has been very welcome, and indicates that NR has an imaginative approach to this whole area. We are aware of difficulties at various sites on the FNL and Kyle Lines and of the measures which are planned to deal with them. This approach must be encouraged to continue in CP6 (and beyond).

Safety also includes less obvious areas for tackling, where fatalities are rare but minor injuries not uncommon. The platform heights on many FNL stations (and elsewhere - Dunkeld & Birnam, for instance) are such that stepping distances are often considerable. Why are Harrington Humps not commonplace? We are accustomed to using only one door at Beaully and Conon Bridge - if a Hump were the preferred access at other stations would this pose an insuperable operating problem?

Q10 We endorse this approach and look forward to an example of its implementation. A Harrington Hump at Dunkeld would seem an obvious one.. On a more strategic level we are keen to see some research which will enable TS to get a handle on whether the prices quoted by Network Rail for infrastructure work, particularly enhancements, is or is not reasonable. The view has been expressed to us that a high price is sometimes quoted "just to be on the safe side". The Secretary of State's recent announcement about East-West Rail in England (between Oxford and Cambridge) may shed some light, but a Scottish experience would be useful, and might be obtained more quickly. Levenmouth - nice and easy as the solum is all still there?

Q11 Were this the final question in a degree examination this would be where the Firsts distanced themselves from the 2:1s. However blessed FoFNL is with bright ideas about the FNL we are not experts and, with regret, we leave this question unanswered.

Mike Lunan, Convener, Friends of the Far North Line, 6 January 2017