

**SPOKES the Lothian Cycle Campaign
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**Please reply to:
ewan@navyblue.org.uk**

7 September 2010

Stewart Stevenson
Minister for Transport, Infrastructure & Climate Change
The Scottish Government
Edinburgh

Dear Mr Stevenson

***ScotRail* Class 380 trains, for North Berwick (and Ayrshire) routes**

We wrote to you on 28 June 2010 to express our concern that the interior design of the, otherwise excellent, new Class 380 trains has a disproportionate emphasis towards inflexible fixed formation commuter seating to the detriment of other stakeholder groups with legitimate access rights to Scotland's rail network, including cyclists and also leisure travellers with luggage, parents with buggies and the elderly infirm with walking aids.

You replied at the end of July saying that you had delegated the reply to *Transport Scotland* and that it would be in touch with us. **Unfortunately, nothing has so far been heard from *Transport Scotland* so we are writing to you again to ask you to please take action to ensure that the interior layout of these trains is more equitably balanced across all stakeholder user groups.**

Having had earlier discussions with *ScotRail*, we believe that at this stage it will require intervention at your level to prevent these trains, which are in the course of being constructed, from being completed with a layout that is seriously flawed because of the lack of interior layout flexibility.

Our particular concerns arise from the announcement that these trains will replace CI 322s on the North Berwick line, although these concerns will generally apply wherever these trains are used.

***Spokes* recommends the provision of a flexible cycle usable space in each of the carriages, so that the needs of Commuters and Leisure Travellers are more equitably balanced.**

Despite being four-carriages long, these new trains will have space for only two cycles in a single cycle zone (consisting of five tip-up seats). In addition, this single cycle zone will be shared with passengers, buggies and possibly excess luggage. The ScotRail normal level of cycle space provision for a four-coach unit would be space for eight cycles, not the two spaces proposed.

This is said to be because of the need to maximise the number of seats for commuters, yet the number of “good” seats is actually increasing from 253 to 277, because the 40 unpopular and under-used centre-of-three seats on the units being replaced are being eliminated.

We consider this to a serious and iniquitous imbalance and that this slashing of the cycle provision on the new trains flies in the face of your *Scottish Government's* policies.

The *Scottish Government* states that on its website that it is committed to increasing levels of walking & cycling as **transport modes** and as **leisure activities**. Its Transport Policy states:

“Scotland's current Transport Policy includes a commitment to " increase the proportion of short journeys made on foot and on bikes to reduce carbon emissions, improve air quality, reduce congestion and contribute to a healthier Scotland thus contributing to the sustainability golden rule to enhance the environment and reduce emissions”.

Furthermore, the recently issued Cycling Action Plan for Scotland sets a bold target that 10% of all journeys should be by bike by 2020. It also rightly commends the excellent doubling of train cycle spaces north of Inverness – but omits to mention that at this very time existing well-used dedicated cycle spaces are to be slashed on North Berwick trains.

In addition the National Transport Strategy (adopted in December 2006 but still in force) states in para 164, *“We aim to further increase funding for cycling and walking overall and will place more emphasis on the promotion of them as sustainable forms of transport ... focusing on ...and the carriage of bicycles on public transport.”*

We find this all the more surprising when *ScotRail's* previous commendable record is considered.

In recent years *ScotRail* has been one of the UK's best rail operators for encouraging bike/rail integration, with a whole range of innovations (including increased on-train bike space on many routes) and has won the UK Association of Train Operating Companies award for this. Are we now to see that trend beginning to reverse?

When *ScotRail* won first prize award in 2006 from the *Association of Train Operating Companies* for the design of the refurbished North Berwick trains including 8 designated cycle spaces, the judges said :

this was a very impressive project that has delivered tangible results. It showed First ScotRail's sheer determination to do the very best for all its customers, while consulting widely, and clearly demonstrates what can be done if the will is there.

As a result:

- The introduction of the 8 dedicated cycle spaces on this line has been a major factor in increasing cycle use both for commuting and leisure, thereby significantly reducing car use.
- It brings additional off-peak fare revenue
- It is greatly valued by customers in East Lothian and the wider Lothian area.
- It has enabled many commuting journeys to be made by train+bike that would otherwise have needed to be made by car.

In addition, *ScotRail* is to be commended on its recent adoption of train formations on the Glasgow and Edinburgh to Inverness routes which greatly increase the number of cycle spaces available.

***ScotRail* has said that the provision of 8 cycle spaces on CI 322s was unusually generous.**

This is not born out by the table below, with 2 cycle spaces per carriage being the *ScotRail* average, at which rate a CI 380 would have 8 spaces!

| Train Class | Number of Cycle Spaces per Train | Average Number of Dedicated Cycle Spaces per Carriage |
|-----------------------------------------|----------------------------------------------|--------------------------------------------------------------|
| 322 (existing North Berwick type) | 8 | 2 |
| 156 (as used on Shotts line) | 6 | 3 |
| 370 (as used Edinburgh-Glasgow) | 6 on 3-coach trains, 12 on 6-coach trains | 2 |
| 158 (refurbished) (as used to Dunblane) | 4 | 2 |
| 158 (un-refurbished) | 2 | 1 |
| 380 (new North Berwick type) | 2 | 0.5 |

ScotRail does propose permitting one bike to be carried in each vestibule (as has historically been the case in Strathclyde, but is far from satisfactory) of the CI 380 carriages at the discretion of the train staff, making up to a further eight bikes per train, providing the train is not too busy. If the train becomes busy en-route further cycles may be refused, even if the limit has not been reached.

Although well intentioned (and *ScotRail* have stated that staff will be briefed that there will always be a presumption in favour of accepting cycles up to the maximum permitted number), this is a compromise response to the inadequate designed-in cycle capacity.

We are concerned that:

- this policy makes it highly likely that at the time of the most demand for cycle carriage

(whether in the commuting peak or at summer weekends) there will be potential for difficulties / conflict between cyclists and non-cyclists. The current designated 8 spaces means that this is rarely an issue.

- as cycles in vestibules will often have to be stood with, difficulties will be faced by families travelling with cycles, as is very common on the North Berwick route. They will not be able to stay together, being distributed along the train's vestibules, with the likelihood of children being separated from their parents whilst they stand with their cycles. We particularly emphasise the seriousness of this point, as it has been raised with us by several families, some from East Lothian, but also Edinburgh families who travel with children to the county's beaches, paths and quiet roads.

ScotRail has said that it would not be fair, or best use of public sector funding to replicate the dedicated cycle space provision on the new trains, as it would reduce the number of seats available.

The current CI 322 trains have 293 seats, whereas the understandable need to find space for wheelchairs and a disabled toilet, means that the new CI 380 trains will have 277 seats (plus another five if cycles are not in the tip-up seat area).

However, these overall seating capacities overlook the very important improvement that in the new trains the seats are in a more spacious 2+2 layout, whilst the older trains had a 2+3 layout.

ScotRail admit that that 2+3 seating is unpopular and that the centre seats often remained unoccupied, even on busy trains with passengers preferring to stand. There are 40 of these unattractive centre seats on a CI 322, so the new trains will actually have 24 more attractive seats, even with two cycles on board.

It is therefore quite likely that if a flexible space zone was provided in each of the four carriages that the number of good seats would still exceed that on the existing trains.

Clearly there must be a fair balance between the needs of different train user groups and ScotRail has said to us that:

The use of available space on our trains is necessarily a compromise between the needs of different passenger groups, i.e. cyclists, non-cyclists, passengers with and without luggage, customers in wheelchairs or parents with prams/buggies. One of our priorities has been to maximise the seating capacity whilst still making adequate provision for those other passenger groups and also fulfilling our obligations to disabled customers.

Each two-cycle space reduces seating capacity by 6 seats when either or both spaces are in use. Each non-paying cycle therefore displaces at least three fare paying passengers from seats. To provide the same level of secured cycle provision as currently exists on the Class 322s would reduce the number of seats available for passengers by more than 100 (over the entire C380 fleet). We do not believe this is fair, or best use of public sector funding.

...we cannot justify continuing to provide a dedicated compound for storing bikes free of charge and, at the same time, ask more fare-paying customers to stand.

Spokes does not consider that an equitable balance has been struck:

- Why is seat-count maximisation the best use of public sector funding, if it discourages legitimate Leisure Traveller use of our train service? Scotland's publicly owned train service provides services to both Leisure Travellers and Commuters and there must be a fairly assessed equality of provision. To accord lesser access rights to Leisure Travellers denies equality of access and is also bad business, partly because their fare revenue is often discretionary and partly because they are paying for off-peak capacity.
- We have already addressed above how the new trains already give an improvement to Commuter Traveller seating.
- The preoccupation with the concept of *non-paying cycles displacing fare paying passengers* misses the point that **unoccupied fixed seating is inflexible**; is of no value for buggy or extra luggage storage; or for cycle use – all of which are accompanied by fare paying passengers. **Well loaded off-peak trains are often very messily cluttered because of a lack of folding seat flexibility.**

Accordingly, we seek the provision of a flexible cycle usable space in each carriage so that the needs of Commuters and Leisure Travellers are more equitably balanced.

We believe that it will require urgent intervention at Ministerial level to have the CI 380 internal layout design adjusted and ask you to please take urgent action.

We look forward to your early and positive reply.

Yours sincerely

Ewan Jeffrey

Spokes Bike/Train Representative

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