

Objection submitted by York Environment Forum

York Environment Forum brings together individuals and representatives of voluntary organisations who are committed to building a sustainable way of life. We focus particularly on the City of York and are members of the partnership that wrote and is responsible for implementing the Sustainable Community Strategy.

This objection is made on seven grounds.

1. The adopted Statement of Community Involvement [¶19.1] states that "The Council will strongly encourage applicants who are preparing a planning application on a major ... site ... to involve the community, as early as possible, before the application is submitted. Taking time for discussions at the start helps everyone involved to understand the issues and concerns about the scheme. The applicant is able to explain the thinking behind proposals to local people, who in turn can make their views known, bringing out the things they value, or the problems they have with the proposals." The document covers Listed Building Consent applications as well as planning applications [see footnote 2, p.24], and since the station scheme is "likely to attract significant community interest" [¶19.3] it is certainly of 'major' status.

National Express East Coast [NEXC] has refused to engage in public discussion of its proposals, and the Council appears not to have made any effort to encourage them to do so. We find this unacceptable, given the substance of the further points below.

2. PPG 15 states that applicants for Listed Building Consent must show why works are "desirable or necessary" [¶13.4]. A simple statement that the scheme is a commitment in the NEXC franchise cannot reasonably be deemed sufficient to fulfil that requirement, especially while the Department of Transport refuses to publish the relevant information. It is not clear whether a strong business case has ever been prepared, and people with specialist knowledge are confident that there are more effective means of dealing with such revenue-protection problems as do occur. York Station poses no significant safety or security risks to travellers. And NEXC's suggestion that barriers are normal on railways is false: they barely exist in mainland Europe.

The PPG requirement has not therefore been met. If the real reason for the scheme is to improve CCTV images of people using the station this should be stated so that it can be subjected to debate.

3. PPG 15 also requires evidence of "the extent to which the proposed works would bring substantial benefits for the community, in particular by contributing to the economic regeneration of the area or the enhancement of its environment" [¶13.5 (iv)]. The installation of gates would

- * impede passengers and present an unwelcoming image to visitors to the City
- * introduce confusion and frustration for people seeing off and meeting relatives and friends
- * remove the opportunity to buy tickets on the train, which some travellers prefer to do
- * reduce revenue at valued trading facilities on the station and probably cause some to close
- * block a popular pedestrian route and force people to deviate by an unpleasant and longer route
- * either disrupt connectivity between the present City and the proposed developments on the critical York Central site or lead to the costly solution of a new and otherwise unnecessary bridge
- * and remove the station from the public realm, despite the evidence from other countries of the benefits of integrating stations with the life of the cities they serve.

On every count the scheme would run counter to the regeneration and environmental objectives specified by the Guidance.

4. In the Sustainable City chapter of the Sustainable Community Strategy the City Council and its partners commit to building "on York's established role as a strategic transport hub by developing sustainable means of travelling to, from and within York that meet the needs of residents, visitors and the economy" and to creating "an integrated network of public transport that is of the highest quality". Introducing barriers at the station would in our judgment be wholly inconsistent with these commitments by making use of the station a great deal less convenient and pleasant and thus discouraging travel by train. We are dismayed that the Council seems not to have invoked this document and engaged in discussion with its partners about the wider impacts of the scheme.

The Council must implement the Sustainable Community Strategy if it is not to bring it into disrepute.

5. York Station is the property of Network Rail, which holds its assets on behalf of the nation. National Express is only a transient occupant on a short-term lease. It is not acceptable that NXEC should be able to impose changes of this nature without the consent of citizens.

The routine processing of an LBC application does not meet contemporary standards of transparency and participation in decision-making.

6. NXEC has claimed that the extra revenue that will result from installing the gates will be deployed on a programme of improvements to the station (dressed up with claims for their 'green' benefits). These works have not been specified in detail and are not the subject of a planning application. In the current state of the finances of the National Express Group it is just as likely that any extra revenue will be used to satisfy the Group's creditors or shareholders.

The Council should therefore ignore NXEC's public-relations material, or postpone the gating decision for consideration as part of a comprehensive scheme.

7. The agreement between NXC and the National Railway Museum to give Museum staff the right to use the pedestrian route across the station both confirms that its closure will be detrimental to users and affords a select group a wholly unjustified privilege.

The Council should insist either that this agreement is negated or, better still, that NXC be required (if the gating is approved) to allow continued public access by means of passes available on demand and without qualification (except on reasonable grounds of suspicion about misuse).

Finally, we draw attention to the House of Commons Transport Committee, Fifth Report, Session 2007/08, ¶60: "There are moves to install ticket gates at more rail stations. Yet ticket gates are not a panacea. They cannot be used by all passengers and staff are still required to be present. Gates introduce new drawbacks including delays and obstructions for passengers; they are not in keeping with historic stations; and they are not always the best method of protecting rail revenue. The Government, in consultation with the rail industry and passenger groups, needs to review this one-track approach and develop a more holistic policy."

We urge City of York Council to reject this ill-considered scheme and to engage instead with National Express and the people of York on proposals to enhance the station for the benefit of the community (including the many options available for effective revenue-protection).

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[E288]

Supplementary note

We also wish to draw attention to the fact that the Supplementary Document that National Express [NX] submitted in May contains a number of misleading statements of which the Council should be aware.

P.1 - "...evidence of large-scale fraud". If this exists it seems odd that it cannot be published, at least in outline. In fact, many railway professionals doubt whether it exists and whether gates are the right solution even for such small-scale fare-evasion as is known to occur at stations like York.

"Gating will ... provide a more comfortable and pleasant travelling experience for customers." There are real concerns about crowding at peak times, about egress in an emergency and about provision for cyclists.

"The company's business case ... is a sound and robust one." Since it has not been published we cannot be sure, but informed railway people doubt it, not least because of the high capital and staffing costs..

P.2 - The recent scheme at Waterloo is described as making it "the largest gated station in Europe". That says nothing about the efficacy of the scheme, and it is a meaningless claim since stations are not gated in Europe, except on urban metro lines.

It is stated that at London St Pancras "modern controls on passenger movement" have been "successfully incorporated into the [historic] design". The ticketing technology and process for *Eurostar* is unique and is irrelevant to York, while the layout and architecture of the barrier area is entirely different.

P.4 - The quotations from Passenger Focus are selective and have since been qualified in respect of stations like York; for an alternative view see the conclusion of the House of Commons Select Committee quoted in our objection. Inter-city customers have never been asked explicitly about their views of gating.

P.5 - National Express "continues to engage with a wide range of stakeholders". We are not aware of any consultations that might sustain this claim.

P.6 - "Each of the individual gates can accommodate up to 33 people per minute." This is a classic of the genre where the crucial words are "up to". That rate could just possibly be achieved if every user were familiar with the system, if no traveller was hindered by luggage and if there were no ticket failures. At a London Underground station with some unfamiliarity, some luggage and some failures the observed exit rate is 18 passengers/minute at best. At stations comparable to York the observed exit rate is about 7 passengers/minute, with perhaps twice that for entry times. The claim of no inconvenience is therefore wholly unconvincing (as a visit to Leeds will confirm), and one hopes that NX's supposed modelling of people movements around the station has not relied on such false data.

It is stated that customers will be able to speak to a member of staff in the event of difficulty. Observation of the melée around busy gates indicates that the reality is poor customer relations and superficial checking of tickets simply because staff are too harassed to do otherwise.

"The proposed gates meet all relevant UK rail-related safety regulations." Another train operator has found it necessary to issue a warning that young children should only use the wide-aisle gates because there is a significant safety risk in the standard gates. In practice it is difficult to enforce this warning.

P.7 - "The installation of gates and the purchasing of tickets before boarding trains at gated stations is well established industry practice." That is an exaggeration, and it glosses over the withdrawal of valued flexibility in using the railway and paying for travel (which must not be confused with criminal fraud). In York this includes the facility to buy all tickets (not just full-fare tickets) on Grand Central trains.

It is implied under the heading 'Compatible tickets' that rejection will be rare. This is not the case with comparable systems so far installed. The technology for reading self-printed and mobile-phone tickets at anything like an acceptable rate is unproven.

NX states in the Supplementary Document [¶116] that it intends to issue passes to non-travellers who wish to enter the platform area, implying that this will normally be straightforward. Its printed leaflet explaining gating conveys precisely the opposite message, ie. that access will only be by negotiated exception.

P.8 - It is stated that 38% of all physical assaults on staff were caused by ticket disputes. The figure that matters is how many of those the gates will prevent. We are not told, but experienced railway people suspect it will be many fewer.