

Application Number: 2009/0047/01/LBC Objection to Statement by the Applicant.

The Objection I lodged on 10th February should stand and is not materially changed by the revised plans and statements submitted by the Applicant. The changes in the plan are only cosmetic, and my objection to the scheme is on the impact of the ticket barriers in what is at present a unified public space that was always intended as such in a Grade 1 Listed Building. They represent a degradation of an important amenity through the unnecessary restriction of movement and the use of equipment that is not fit for its actual purpose of correctly checking tickets. Its appearance is not the main concern. The scheme will have a serious impact on those using the station for its original function. This wholly inadequate Statement by the Applicant contains a lot of inaccurate or misleading claims, and the Application should be refused on the grounds that the statement does not provide proper justification for the changes proposed to the working of the station. My comments:

1. Overall Context.

Gating is a franchise commitment, entered into as a condition of the franchise. While clearly true, this is not a justification for the scheme, merely the excuse.

Gating is supported by the Rail Minister. The South London gating schemes, to be introduced in advance of the letting of the new South Central franchise, are in an entirely different context to York or Newcastle. These are suburban stations, in an area where the gates can address genuine problems of revenue control or security, where the technology can be relied on, and their introduction will support the extension of the Oyster smartcard scheme. It is in no way evidence of a similar requirement on the East Coast Main Line.

Gating is becoming increasingly common throughout the world. This is untrue. Elsewhere gates are only used very selectively, usually on Metro and suburban systems, and they are completely unknown in large areas of Europe. Nowhere in Europe are they used on Inter City networks, with the single exception of Eurostar where they perform a quite different function related to train check-in and security system, and free exit is retained. The scheme for King's Cross is seriously flawed on customer service and revenue control grounds and will be subject to separate challenge, while Waterloo is essentially a commuter station with quite different user and ticketing characteristics to York and Newcastle. These comparisons are irrelevant.

Gating prevents fraudulent travel. There is no evidence that this is generally true, especially in the circumstances of major mixed-use stations. It is fair to say that in a suburban context with large numbers of short distance journeys where on-train checks are difficult to manage, gates can be shown as effective to the extent of halving fare evasion. They do not prevent it. Such suburban flows do not exist at York or Newcastle (in the latter case they are on the Tyne-Wear Metro, where gates are quite reasonably to be reintroduced at key stations).

Gating contributes to a safer environment. Again this is extrapolation from suburban experience. There is no evidence of a relevant security problem at such major mixed use

stations, that the gates would address. The present open layout makes them well frequented. Passenger Focus data supports this view and they already have secure station accreditation.

2. Business Case

The circular argument that the Business case for gating must exist because the Government awarded the franchise on the basis of its inclusion, and supports such policies elsewhere, is illogical. In other statements the Government has said it is not the custodian of the business case for these schemes, that is a matter for the Operator, who must have one or they would not have put in their bid. The Government also, in Freedom of Information requests, has declined to produce any information that supports its position.

To say the business case for gating rests on a comparison of manual and automated barriers is also illogical. In practice National Express has not evaluated other options, such as improvements to on-train control (as practiced elsewhere throughout Europe), because it was concluded that closing of stations was favoured by Government and would assist in winning the franchise. The agenda of the DfT in promoting the closure of stations with ticket barriers is well known and is evident here.

It is not possible to debate issues that are hidden behind commercial confidentiality. This suggests that they are open to challenge and there has been no proper measurement of the revenue at risk or a reasoned evaluation of the best means to recover it.

3. Customer Flow and Behaviour

The statement that the gates can check up to 33 passengers a minute is completely misleading. On the London Underground, where there is 25 years of experience with this sort of equipment, the ticket technology supports the gates well and passengers are mostly unencumbered used to them, they do not assume anything like that number, as there are a number of other factors to do with passenger behaviour that will reduce it.

The actual experience of gated stations that are in any way comparable to York and Newcastle is completely at odds with the statement here. Passengers find them difficult to use, the technology is often faulty, there is a high degree of manual intervention and fare evasion is not in fact prevented. At Leeds, a station with some similar characteristics to Newcastle but heavier local traffic, there is a very high degree of manual intervention, and this has a serious impact on customer service and passenger flow.

4. Pedestrian Flow Analysis

This is largely irrelevant as the issue is the non-functionality of the barrier equipment causing congestion and inconvenience to customers. The modeling assumes the perfect operation of gates, not the shambles that applies in practice and can be observed at Leeds, where an estimated 30% of users require or seek assistance for some reason.

5. Reducing Anti Social Behaviour

The claim that 38% of all assaults on staff were caused by ticket disputes does not give an absolute number, nor does it say where the dispute arose or what the actual reason was. There is no evidence that ticket gates solve all or any of these. They may well be related to circumstances in which a passenger travels on an advance purchase ticket and is charged a full fare. The barriers will not prevent that. There is also no evidence that gates are any more effective in dealing with anti social behaviour than other measures, in the circumstances of this station, which already has Secure Station accreditation.

6. Passenger Focus Support

This is repeatedly quoted by National Express in support of their gating schemes. While Passenger Focus have made general statements in support of ticket barriers, they have also said that each scheme should be considered on case-by-case basis and they cannot be assumed to support either York or Newcastle. In that context their Director, Anthony Smith, has said that in an ideal world gates would not be required, and a colleague has described them as a necessary evil. They would expect there to be overall benefits for the passenger, and in these cases none is apparent.

7. CCTV

This section contains the very worrying statement that “post the 7/7 attacks there is a requirement for coverage of entry and exit points at all stations”. The implication of this is that the gates are in fact being installed to reduce the number of such access points, and to slow down and position people in such a way that they can be captured by the cameras. That this whole scheme is actually about the surveillance of individuals is further confirmed by the requirement to achieve “identification and recognition standards”.

8. Customer Service

It is stated that gates will always be managed by a member of staff who will be able to answer enquiries. This conflicts with the plan, for York at least, that some gatelines will be unmanned at certain times and remotely supervised. In practice, as can be observed at Leeds and elsewhere, the staff are so preoccupied in dealing with the problems that the barriers create that they are unable to offer useful assistance or information for customers. In practice National Express engage Agency staff for this work with limited relevant experience or suitability. Customer service staff should be provided for that specific role.

9. Trading Kiosks

There is evidence that the division of stations into paid and unpaid areas has an adverse impact on station trading revenue and use. In part this is due to reduced footfall from occasional users and an enforced inflexibility of passenger movements between outlets, but it is also due to the increased stress that the barriers impose on users. Stations cease to be a relaxed place to be and spending as well as time for it is reduced by customer

anxiety. In the end this will result in reduced choice to the customer and rental revenue to the rail industry. Evidence available from Select Service Partner, the main operator of station catering in the UK, confirms that the division of stations into paid and unpaid areas with ticket barriers decreases revenue by about 10%, and in some worst case examples, such as at another station operated by National Express (Cambridge), by 60%. Another problem is that the toilet facilities are on Platform 3, within the proposed paid area, whereas most of the catering outlets are outside. National Express have already made this mistake at Norwich. The Rail Minister, Lord Adonis, in his recent journey by rail around Britain, complained about the lack of catering facilities at Southampton, a station divided by barriers, while praising Sheffield, which at present retains an open layout, threatened like York and Newcastle.

10. Impact on the Look of the Station

It should not be the actual look of the barriers themselves that is the cause for concern. It is what they do to the general ambience and feel of the station, and the creation of stressed crowds of passengers around them because of the poor functionality of the equipment and the interruption of natural flows of people. These stations were designed to allow free movement and have been greatly enhanced by the reinstatement of that facility, which this scheme will end. The images shown of the clean gatelines and barriers are wholly misleading as there are no people in them and that is what the station is all about.

11. Compatible Tickets

There is a very major problem in this area which National Express are completely glossing over. They intend to use Scheidt & Bachmann gates which to date have shown themselves at Leeds and elsewhere as demonstrably not fit for purpose in terms of their performance. The magnetic ticket technology, as at present configured, and there is no short term prospect of significant improvement, does not adequately support correct ticket checking away from the London commuter area. The coded data is too restricted for the complex system geography and fares structure at a major provincial centre, and the software cannot be relied to make a correct validity assessment. Also there are frequent problems in the physical reading of the ticket. To say that there will be a minimal number of incompatible tickets is simply wrong, and compliance with the industry standard, which itself does not provide adequate support, is often very variable. A significant number of tickets that are in theory machine readable will in fact be a source of problems, usually of inappropriate rejection or capture. There remains a further incidence of ticket types and passes that cannot be machine read and these will also increase the need for manual intervention. The proposed use of barcode readers to check "print-at-home" paper tickets or mobile phone screens in regular passenger use is largely unproven and untested. The sole public application at present is on another supplier's gates where it can be shown to be slow and difficult to use. No volume use has yet been achieved. There is no mention of smartcards, which are another National Express franchise commitment.

12. Meeters and Greeters

The proposal here is in reality impracticable and unreasonable as it requires the staff, who will already be under pressure because of ticketing problems, to maintain their courtesy and use their discretion in a consistent way in difficult circumstances. They will also be expected to provide information and other assistance. It is not an acceptable offer, despite the lack of a charge, and will add to the congestion around the barriers as people negotiate access from staff who will be too preoccupied to attend to them properly.

13. Historic Environment

The statements here are not correct, although it is true to say that ugly ticket collectors booths and metal barriers were installed at these sort of stations for much of the 20th Century. This was not the work of British Rail but of its predecessors, and it was BR that removed them to restore the stations to something like their original appearance and ambience with free movement to and from the trains.

The comparison with St Pancras is misleading. There are at present ticket barriers of the type used on the London Underground at the sub-surface Thameslink station, while those provided by Eurostar are of a wholly different design and purpose integrated with the check in process. Neither are at platform level in the train shed, and their location and appearance does not disturb the flow of people through the main areas of the station.

There is absolutely no reason why historic stations of this kind cannot be maintained properly without recourse to this inappropriate and ineffective form of ticket control, as there are plenty of precedents elsewhere in Europe where open access is the norm.

14. National Express Record

There are also numerous examples of gates that have been installed in inappropriate circumstances, with many of the problems outlined above. It is true that there are some satisfactory schemes at Listed stations, notably on London Underground, but National Express does not have a good record on this, having installed two very poor schemes in Listed buildings at Cambridge and Norwich, the numerous deficiencies of which should serve as a warning. Both have degraded the appearance of the fine buildings they occupy and are a cause of serious congestion and a reduced quality of service for passengers and other users. This must not be repeated at an important Grade 1 Listed Building.

Richard Malins
Director, Transport Investigations Ltd (specialists in rail revenue control)
1 Station Approach,
March, Cambs
PE15 8SJ

1st May 2009