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Dear Richard Brooks,

### **Proposed changes to schedule 17 of the Ticketing and Settlement agreement**

Thank you for the data you provided supporting your proposals to reduce ticket office hours at 86 of the stations you manage. We recognise that in challenging financial times it is important that Government and private companies make the best use of resources. We acknowledge that over time there may be a change of demand at some stations and it is proper to consider staffing. However any restructure must be balanced with the needs of passengers to access rail products, and their rights as paying passengers to good customer service. The data you have provided does not allow us to draw conclusions about either of these points, and therefore we object to the proposals.

Passenger Focus welcomes the positive approach London Midland has taken to advertising the consultation. We have received approximately 18,000 responses.

- **Petition signatures** – 14,583
- **Individuals** - 706
- **Pre paid post cards** - 3271
- **Templated letters** - Winsford ( 60 signatories) and Hartford (526 signatories)
- **MPs** - Tom Watson, Ian Austin, Caroline Spelman, Gisela Stuart
- **Other correspondents** - Regional organisations, rail users groups, Trade unions, Transport organisations, local authorities and councils

All but one of the 18,000 raised concerns and opposed the measures, one did support them. Issues raised will be outlined in the closing section of this letter. Data issues will be dealt with first.

We appreciated the efforts you have taken to provide us with information about the accuracy of the information on hourly ticket issues. However there is a crucial issue that is unresolved. We are concerned that prior to, and during the data collection period, some of the offices included in the proposals were unstaffed during advertised opening hours. Your own data shows times when stations were unstaffed during the data collection period. We also have anecdotal evidence of other periods where stations have not been staffed during advertised hours. We are



unable to ascertain how widespread this practice has been, and therefore cannot tell if it has suppressed demand at ticket offices. For this reason we must object on behalf of passengers to these proposals.

Whilst we do not accept the data is yet proven to be valid, we have looked at the data and the impact on the stations involved. In our view there are stations where there is sufficient usage to suggest the proposed cuts are too great. For example Hall Green where it is proposed to close the ticket office on Sundays. On Sundays the ticket office issues a total of 48 tickets between the four hours 10.00 – 14.00 averaging out to 12 tickets an hour. In cases like these we think the case for total closure of the office has not been made. For this reason we object to the proposals.

While we welcome London Midland's proposal to provide an additional 29 ticket vending machines (TVMs) they have limitations.

Our national research report "Ticket Vending Machine Usability" published in July 2010, shows that in some cases the machines fail to provide sufficient information about routes and ticket restrictions to allow for informed choices to be made. The screens are often cluttered and the selection steps are often confusing.

Looking specifically at London Midland TVMs passengers raised the following issues:

- Failure to provide a full range of products , "nNewtork" and "nDaytripper" tickets; extension tickets where a season ticket is held for part of a journey; Groupsave; tickets for departure from another station
- TVMs will not accept cash payments causing problems for those without credit cards e.g. young people. Some passengers have stated a preference for paying low value transactions by cash.
- Having only one TVM on a station is inconvenient and time consuming. Some passengers are forced to walk from the platform of departure to another platform and back in order to purchase a ticket. Those with mobility issues or who are travelling encumbered find this particularly unsatisfactory.
- Not everyone is able to use a TVM due to dexterity or language issues. In some cases where sunlight is a particular problem, most passengers find difficulty in using TVMs.
- All of the stations in the proposal fall in the penalty fares area. Passengers have expressed concerns about the risk of penalty fares should a TVM malfunction, or have been vandalised.
- A surprising number of passengers have raised concerns about ticketless travel and loss of revenue.

Many passengers have raised the issue of accessibility when stations are unstaffed. Whilst passengers with disability can book assistance 24 hours in advance, this is considered impractical for short journeys and frequent journeys. Passengers travelling with buggies are unlikely to consider booking help an option. These passengers rely on staff at the station for assistance. Where stations have lifts passengers seek assurances that they will remain available if staff are removed.



Security is another issue for passengers. Returning to isolated unstaffed stations on dark winter afternoons is not an encouraging prospect for many passengers. Our priorities for improvement research shows availability of staff of stations has risen in order of importance from 17<sup>th</sup> in 2007, to 10<sup>th</sup> in 2009. Staff give passengers a sense of security. Passengers frequently say that a help point won't phone for the police or ambulance if they need help. There is a sense that unstaffed stations are not as clean or cared for, and that they are more likely to become the target for loitering and vandalism. In this consultation the question of management of large numbers of children on the stations has been raised as an issue. This occurs where schools are located near to stations e.g. Hall Green and Butlers Lane.

Staff at some stations provide access to facilities. For example Tile Hill station has waiting shelters on the platforms but when this modern and convenient office is shut there is no access to the warm shelter, the accessible toilet, or the pay phone. Loss of staff means a real loss of facilities for passengers using this station.

Finally, concerns have been raised that some of the stations in the proposals have high footfall particularly in peak times. Removing staff from these stations on the basis of ticket issues seems to many counter intuitive. There have also been concerns raised about loss of trade in the surrounding area if stations are unstaffed and appear unwelcoming. This is particularly true of The Jewellery Quarter. Passengers pose the question whether unstaffed stations may deter people from trying rail as there will be no one to offer information. Furthermore during disruption staff are viewed as invaluable and irreplaceable.

The key message that has come through the consultation is that London Midland provides a valuable service. Passengers want to continue travelling from clean and welcoming stations. They want to be able to buy tickets with ease, and obtain help when it is needed. On this basis we object and ask that you will reconsider these proposals.

Yours sincerely,

**Jocelyn Pearson**  
**Passenger Link Manager**