

Our Ref:
Your Ref:

12 February 2009

Karen Boswell
Customer Services Director
First Capital Connect Ltd
Hertford House
1 Cranwood Street
London EC1V 9QS

Dear Karen,

Schedule 17 application

Thank you for your letter of the 22nd December 2008.

The application was considered at the London TravelWatch board meeting on the 10th February 2009. Our members also had available to them a summary of the responses we had by that date received from members of the travelling public and from various public and private bodies in our area of interest.

The Board resolved to submit a formal objection to your proposal on the basis that the proposal as it stands would significantly reduce the ability of passengers to access rail products from the stations affected. Particularly, as we felt that at a significant number of the stations you proposed changes at, the number of transactions per hour in the hours that you proposed for closure exceeded the Secretary of State's definition of a busy station requiring a continued staff presence, as set out in his recent decision on a similar application by Stagecoach South West Trains.

I have to advise you that our members were far from being persuaded that a sufficient case had been made to justify reductions on the scale proposed, in part because they felt that insufficient assurances had been received from you about staffing arrangements generally at the stations concerned. In addition board members had a very strong view that booking office staff had a much wider role of providing information and assurance to passengers than simply that of selling tickets. They felt that there is abundant evidence (not least in many of the public responses) that passengers welcome the visible presence of staff because of the contribution this makes to enhancing security, especially at less-busy times such as those at which you propose to withdraw ticket counter service.

We believe that station staff should be multi-functional, visible, and available to assist passengers generally (not merely those who have prearranged help via the assisted passengers reporting scheme); and that station facilities (such as lifts, toilets and waiting rooms) should continue to be available for passengers' use irrespective of whether ticket offices are open. We believe that stations should be developed as places of service for passengers and their communities on an all day basis. The reference in your letter to CCTV and help points shows a failure to appreciate that in the eyes of passengers such technology can only be an adjunct to the role of staff and not a substitute for it.

There is a widespread conviction that these proposals will result in stations and railway infrastructure becoming more vulnerable to vandalism and anti-social behaviour. We note and welcome the many initiatives that your company has undertaken to reduce crime and anti-social behaviour on your network, and the significant reductions in recorded incidents of this nature in recent years. However, we would not like to see these achievements undermined by any reduction in booking office staffing. We observe that many of the stations (and their immediate environs within the railway boundary) included in your proposals are subject to frequent and extensive graffiti damage, and we would urge a concerted effort on the part of yourselves and Network Rail to reduce this.

There are a number of other, specific issues arising from these proposals, some of which have been raised repeatedly in comments received from FCC users, which are of concern to our members.

- (a) Oyster pay-as-you-go ticketing is due to be introduced generally for travel on National Rail services in London within the next year. Members felt that any change in booking office hours within the London Travelcard area should not take place until the Oyster Pay As You Go top up facilities that you have committed to introduce on your Ticket Vending Machines are fully operational. We would also ask you to actively consider extending Oyster retailing to all your booking offices throughout the Greater London Travelcard area.
- (b) Several stations served by your services are due to be gated. This will affect the volume and location of ticket sales. Our members felt that it would be premature to take pre-emptive decisions about ticket office staffing now, when the effects of the introduction of ticket gates both by yourselves and the operator of the current Southern franchise have yet to become clear.
- (b) There is a lack of confidence in the reliability of ticket vending machines (despite your assurance of 98% reliability), coupled with concern that passengers who are genuinely unable to obtain tickets may nevertheless fall victim to the penalty fares scheme. Machines located in the open (because ticket offices are locked out of use) are perceived to be particularly vulnerable and, under unfavourable lighting conditions, their screens are difficult for those with less-than-perfect vision to read. They are very vulnerable to vandalism, and intimidating to users who are not familiar with them. Members were particularly concerned that many Ticket Vending Machines do not have adequate shelter for both the user of the machine and those queuing to use it.
- (c) Reduction of ticket office hours is likely to increase demand at other times of day or week when ticket offices are still open. For example, if it is no longer possible to renew season tickets at weekends, Monday morning queues are likely to lengthen. Our members noted that your proposals contain no commitment to ensuring that queuing times at busy times do not increase, e.g. by opening additional windows where available. We would expect that should the proposals be introduced (in part or in full) that there will be remedial measures put in place to ensure that your companies previous excellent record in this regard in the National Passenger Survey is not compromised.

- (d) At Luton Airport Parkway station we note that there are a significant number of flights which either are scheduled to arrive in the late evening or regularly arrive later than scheduled at the airport. This shows up in your data and we feel that it is important that the booking office should remain open until 0100 hours.
- (e) We are extremely concerned about your proposal to reduce hours at City Thameslink, Blackfriars, Elephant & Castle and Loughborough Junction on the basis of the impact of the Thameslink upgrade programme. Whilst, we can understand that for the duration of the suspension of services at weekends that it would not be necessary to fully staff booking offices, we feel that basing the proposal on what should be a temporary arrangement is not acceptable, and we believe that in a number of cases the data that you used included some days when engineering possessions were in place which would have distorted the pattern of use unfavourably. We would therefore urge you to consider removing these stations from your proposals and reviewing the booking office hours of these stations again once the major Thameslink engineering possessions have been completed and passengers are able to use a full range of services at weekends again.

The specific stations in our area in relation to which we have received objections are appended to this letter. I also attach a list of the organisations and individuals from whom we have received representations on this subject. The full text of their comments accompanies the hard copy of this letter.