

**Re: Rail Fares and Ticketing Review Consultation**

Thank you for the opportunity to comment on the Government's consultation on Rail Fares and Ticketing review. The commitment of the Government for a modern, customer-focused railway which allows more passengers to travel and to have a better experience of rail is welcome.

The County Council has made substantial investment in providing improved rail facilities and continues to place a high priority on rail in delivering its transport policy. This has included working with third parties to deliver two new rail stations using third party investment and numerous other improvements to passenger information, safety and security at rail stations across Warwickshire.

The overall trend in the numbers of rail passengers in Warwickshire is one of sustained growth with rail travel becoming increasingly important. Commuting and business travel to the West Midlands Conurbation and Coventry form a substantial element of rail travel in the County for people from a wide range of socio-economic groups. In some communities in Warwickshire, trains provide essential 'socially necessary services' as rail is the only form of regular public transport. There is also significant use of rail for commuting and business travel to London and the South East. Rail journeys for retail, leisure and social activities are also growing.

Accordingly, the County Council response is as follows:

***Chapter 1: Principles of fares and ticketing regulation***

*Q1.1 - Do you agree these are the right objectives? Is there anything we've missed?*

The County Council agrees that these are the right objectives.

*Q1.2 - How effective do you think the current system is in achieving the Government's regulatory objectives?*

No comment.

***Chapter 2: Smart ticketing and season tickets***

*Q2.1 - Do you agree with the benefits and with the risks and issues we've identified in relation to smart ticketing? Is there anything we've missed? How might we address the risks and issues?*

The County Council agrees that the use of 'smartcards' and other modern technology can remove barriers to using public transport and that most of the risks and benefits have been identified. However, as stated in paragraph 61 of the consultation document, a 'pay-as-you-go' smartcard system does not appear to be the best model for the national rail network. This is because

passengers making longer distance journeys, which have more expensive fares, are more likely to want to know the maximum level of fare they will be charged before making their journey. This issue would merit further discussion with the wider rail industry to assess the best way forward.

*Q2.2 - Do you agree with the issues we've identified with the current system of season tickets? Is there anything we've missed?*

The County Council agrees with the issues identified.

*Q2.3 - What features would you expect to see in a smart, flexible and more tailored season ticket? (Please select all that apply)*

- o Fares vary by time of day*
- o Fares vary by day of the week*
- o Fares reflect the number of journeys actually made*
- o Other (Please state)*

No Comment.

*Q2.4 - Do you have any other suggestions as to how season tickets could be tailored to better meet the needs of particular groups?*

No Comment.

### ***Chapter 3: Using fares to achieve more efficient use of rail capacity***

*Q3.1 and Q3.2 - Do you agree that introducing new commuter fares could help the railway operate more efficiently by encouraging some commuters to change their travel patterns? What do you consider to be the main benefits and the main risks/issues with introducing new commuter fares?*

The County Council agrees that changing fare levels will change travel behaviour and would bring a welcome reduction in overcrowding but it is not clear whether this will result in a railway that overall operates more efficiently. The changes that passengers would make appear to depend on local circumstances such as whether the car is a realistic alternative mode of transport. Commuters travelling into London have no other meaningful alternative options for travelling. In these circumstances peak spreading could be expected following the introduction of higher peak and high-peak fares. Commuters in other areas, for example between Nuneaton into Birmingham, could easily choose to drive their car and whilst this would reduce peak overcrowding it would have the unintended result of increasing city centre congestion.

*Q3.3 - How could we ensure that any new commuter fares structure was as fair as possible?*

The question of whether a new fare structure is or is not fair is more of an issue if there is no alternative mode of travel to the destination. This is more likely to be an issue for travel to and from London where rail has a captive market. The

County Council is concerned that for commuters travelling to and from Birmingham that fares should be affordable and should be less than the full cost of the equivalent journey by car, as estimated by leading motor organisations. Higher fares could lead to passengers choosing to drive instead of taking the train which would erode the wider benefits that are secured by people choosing to travel by train.

*Q3.4 - How could we use fares to achieve more efficient use of rail capacity on intercity services?*

Intercity services outside of London are used by commuters as intercity services provide part of the regional rail network. Therefore, a significant amount of overcrowding on intercity services would appear to be as a result of commuters using these services. A solution to this problem may be similar to that proposed for commuter fares. However, the County Council would be concerned that this avoids the unintended result of pricing commuters off the railway and into cars.

#### **Chapter 4: Fares and ticketing complexities**

*Q4.1 - Currently, passengers with Advance fares valid only on one specified departure who miss that departure must buy a new ticket to travel on the next train (unless the missed departure is due to a missed national rail connection, in which case train operators generally accept the original ticket on the next service). We are considering whether passengers could be allowed to “pay the difference” instead (potentially on payment of a fee, if this was considered necessary to avoid perverse incentives). What do you see as the main advantages and disadvantages of such a change?*

This appears to be a fair proposal.

*Q4.2 - There is evidence of an imbalance (even after taking account of differences in average income) between fares in the London commuting area and other parts of the country, and that passengers on higher yield services are effectively cross-subsidising passengers on lower yield services. This is something we intend to explore further as part of the review, but we do believe that there is a case for reducing any significant regional imbalance in fares levels. What would you see as the main advantages and disadvantages of such an approach?*

The County Council's policy is that rail fares should be affordable and should be less than the full cost of the equivalent journey by car, as estimated by leading motor organisations, except when the service provides a significantly faster journey time. An attempt to address any regional imbalance in fares should not lead to an increase in fares levels in the wider West Midlands area that could result in passengers leaving the railway in favour of using a car.

*Q4.3 What steps could the Government take to protect passengers' overall interests as part of providing open access to fares data?*

No comment.

## **Chapter 5: Buying tickets**

*Q5.1 - Selling tickets through ticket offices is a major cost for the railways. How can we reduce this cost without deterring passengers from using the railway?*

The County Council does not support the closure of ticket offices and believes that a personal interface is essential to provide a high quality travel experience for passengers. Many elderly people find self-service machines difficult to use or are confused by the range of ticket types and options available and therefore are more confident using a face-to-face service. In addition disabled passengers may also prefer to purchase tickets using a face-to-face service especially if they have visual impairments or are wheelchair users.

*Q5.2 - What are the costs/benefits of reducing ticket office opening hours? What would you consider to be an acceptable alternative to the ticket office that met most of your ticket requirements?*

The County Council does not believe there is an acceptable alternative to closing or reducing the hours of operation of ticket offices. Purchasing tickets at stations where there is no ticket office present a problem for passengers that want a ticket that cannot be sold or collected from a ticket machine. This presents a barrier to those not familiar with travelling by train and can be a cause of anxiety to some passengers if a ticket cannot subsequently be bought on the train and results in passengers arriving at a terminal station and having to explain why they have no ticket.

*Q5.3 - What safeguards would need to be put in place for passengers in the case of changes to ticket office opening hours?*

The County Council does not support the reduction of ticket office opening hours and expects a ticket office to be open whilst the station is served by trains.

*Q5.4 - How important is it for passengers to be able to buy train tickets from a wider range of outlets (e.g. including post offices or retail outlets located away from the station)? Please feel free to make any additional comments about how you would like to be able to buy train tickets in future.*

The County Council believes that the railway should be affordable, accessible and simple to use. Any initiative that provides passengers with more convenient ways to purchase tickets would be welcome. Allowing outlets such as Post Offices, retail outlets, Libraries and Leisure centres to sell train tickets would be a welcome boost for communities that currently have an unstaffed station or a station ticket office with limited opening hours.

*Q5.5 - What other improvements would you most like to see to make buying rail tickets easier?*

No comment.

## Chapter 6: Next steps

*Q6.1 - Do you have any other comments about the impact of anything in this consultation document on passengers or potential passengers, including by income group, equality group(s) or any other group?*

As stated earlier, the requirements of elderly and disabled passengers need to be considered carefully when making changes to how rail tickets are purchased. Many elderly people can be confused by ticket machines and are more likely to rely on a face-to-face service. Disabled passengers, particularly those with visual impairments or using a wheelchair, are also likely to prefer to purchase tickets using a face-to-face service.

*Q6.2 - Are there any other comments you would like to make about anything else in this consultation?*

The County Council notes that whilst the 'standard fare per mile' fare structure was abandoned by British Rail in favour of a more market-driven approach this has resulted in some irregularities in fare levels for travel into major centres such as Birmingham from stations that are broadly all the same distance away. For example, in respect of Birmingham the following table illustrates the issue.

	Nuneaton	Coventry	Warwick	Stratford-upon-Avon
Distance from Birmingham	19 miles	18 miles	19 miles	22 miles
Peak day return	£9.60	£6.90 (all operators) £5.00 (Virgin only)	£8.40	£8.30
Off-peak day return	£9.60	£4.70 (all operators) £3.40 (Virgin only)	£7.00	£6.90

The County Council would welcome further discussion on fare anomalies.