

National Rail penalty fares rules policy and charge change consultation ~ Response from Campaign for Better Transport

Increasing penalty fares could discourage modal shift to rail

The consultation document does not provide adequate evidence for why an increase in the cost of penalty fares is appropriate. It is suggested that the goal of this measure is to protect revenue by discouraging passengers from travelling without a ticket. However, the case is not made for increasing penalty fares as a good way of protecting revenue. There is no analysis which weighs up the advantages and disadvantages of the proposal for overall revenue levels or for other Government goals. We are concerned that increasing penalty fares will have the unintended consequence of discouraging modal shift to rail.

Our research suggests that modal shift from cars and planes to trains could reduce carbon emissions significantly.¹ The Government is making progress on achieving modal shift by trying to get people to reduce car miles through its '5 a week' campaign, setting climate budgets and implementing the low carbon transport strategy. It is reducing barriers to train travel by introducing station travel plans and increasing cycle parking at stations. Increasing penalty fares by more than double could discourage people from taking the train and harm the progress made so far, for the following reasons:

Complex ticket structures mean it's easy for people to make a mistake

Despite the simplification of ticket names in 2008 (anytime, off peak, advance), passengers are still faced with a confusing multiplicity of rail tickets and time restrictions. The system often produces inconsistent ticket prices which can be hard for people to understand. The complexity of the system means people are more likely to make honest mistakes. In this context increasing penalty fares would be unfair and could discourage potential passengers. Passengers want to be valued, not treated like potential criminals.

Higher penalty fares are yet another barrier to train travel

Buying a ticket and getting on a train has become less user friendly over time, and increasing penalty fares would exacerbate this trend. The introduction of permit to travel machines and the replacement of ticket offices with ticket machines mean that buying a ticket is more difficult and complicated than it was. Platform barriers make it harder for people to meet and greet friends and family or help with wheelchairs and pushchairs. Increased penalty fares are likely to increase stress and anxiety about buying the wrong ticket by accident. These measures are intended to protect revenue but they may have unintended consequences because they make train travel a less pleasant experience. Passengers want buying a ticket and getting on the train to be easy and quick, but they now face multiple barriers. We think the Government should reduce barriers to train travel, not increase them. That means people should be able to turn up at a station and buy their ticket on the train without being penalised.

Ticket office queues are too long

Long queues at ticket offices are a major problem, and increasing penalty fares when this problem has not been dealt with would be unfair. Train operators are obliged to make 'reasonable endeavours' to ensure that passengers queue no longer than five minutes for a ticket at peak times and three minutes at off peak times,

¹ 'Transport Costs and Carbon Emissions', December 2008, Steer Davies Gleave, commissioned by Campaign for Better Transport

but research shows that passengers often wait much longer than this to buy a ticket.² The most recent National Passenger Survey shows that 13% of passengers are dissatisfied with ticket buying facilities.³ Passengers should not be penalised when ticket buying facilities are inadequate. But at the moment, they are. Passenger Focus advice suggests that passengers who stand up for their rights by getting on the train when queues are too long may still have to pay penalty fares.⁴ We support the suggestion from Passenger Focus that the Department for Transport should include a specific obligation on ticket office waiting times in new franchise agreements, backed up by enforceable targets. In the meantime, the Government should not increase penalty fares. Instead, it should send a clear message to both train operators and passengers that if the queue is too long, passengers are entitled to get on the train.

Incentivising train staff to collect penalty fares would have bad consequences

We think it would be inappropriate to give train staff a financial incentive to collect penalty fares. This measure would encourage staff to behave unfairly towards passengers. It could damage relations between staff and passengers. And, perhaps most importantly, the staff time that is spent on collecting penalty fares would mean less staff time could be spent on providing good customer service. Civil parking enforcement provides an example of where incentivising staff in a similar way has generated bad media coverage.

Instead, the Government should make it easy and pleasant for people to buy a ticket and take the train

More ticket offices and more staff are needed

Instead of focussing narrowly on revenue protection, the Government should encourage rail growth and consider a range of options for dealing with the practical implications of this trend. The Department and the train companies should look at how to enable passengers to easily buy their ticket and catch their train, how to deal efficiently with large numbers of rail users. Queue lengths are likely to increase given the growth in passenger volumes. That means the Government should ensure that train companies provide more staff, more ticket offices, more ticket machines, fewer barriers, more on-train revenue protection people and more options for passengers including the selling of tickets on trains.

We agree that train companies should discourage ticket evasion, both so that all passengers are treated fairly, and so that rail network investment is protected. However, we believe the key to this is providing well staffed ticket offices and trains. This also has other benefits in terms of making passengers feel safe, helping them when they need help with buying their tickets or with wheelchairs or pushchairs. Many people will continue to buy their ticket from a ticket office so providing enough staff is vital.

Rail fares regulation should be reviewed

UK fares are the highest in Europe and only 40% of passengers think that they offer value for money.⁵ Many people have contacted us explaining why they need affordable rail fares.⁶ While it is possible for passengers to buy cheap advance tickets, if people want to turn up at the station and go they must buy walk-on tickets which may cost up to seven times more than the advance fares. When fares are so high, this increases the incentive for passengers to avoid paying if they can. We do not condone this but we do understand it. We ask the Government to review rail fares policy and regulation so that the system can be changed to make taking the train an easy option. The complex fares structure is also a disincentive to travelling by train and is another reason why rail fares regulation should be reviewed to make things simpler. Simplifying and cutting

² 'Ticket queuing times at major stations', May 2008, Passenger Focus

³ 'National Passenger Survey', Spring 2009, Passenger Focus

⁴ <http://www.passengerfocus.org.uk/advice-and-complaints/advice-and-information/question.asp?dsid=185>

⁵ 'National Passenger Survey', Spring 2009, Passenger Focus

⁶ http://www.bettertransport.org.uk/take_action/your_comments_affordable_rail

train fares and introducing a fuel tax on domestic flights would be revenue neutral overall and would enable people to reduce their carbon footprint.

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Campaign for Better Transport

Campaign for Better Transport is the leading transport NGO. Our compelling arguments and ideas have won us the support of national decision-makers and local activists, enabling us to secure transport policies and programmes that improve people's lives and reduce environmental impact.

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