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promoting quality public transport.....

Transport Focus
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Dear Transport Focus,

Train Station Ticket Office Consultation Avanti West Coast

1 Introduction and Procedural Issues

1.1 TravelWatch NorthWest is an independent CIC representing all public transport users in NW England. We are pleased to give our views on this important and controversial consultation.

1.2 We understand that the closure provisions of the Railways Act 2005 include the closure of part of the station (as well as a complete closure) and there is a formal consultation process for this. We are aware that the 2005 Act (section 35) also allows some changes to be considered as minor modifications rather than closures. These minor modifications follow a far less onerous process.

1.3 We further understand that the definitions of minor are as follows -

- a) The demolition of structures within a station, for example station toilets, waiting shelters, platform canopies, or footbridges;
- b) the permanent closure of any station facilities, such as locking out of use toilets, waiting rooms, etc. (even if the structure remains in place);
- c) the reduction in length or removal of a platform
- d) the relocation or reduction in size of a station car park (owing to sale of station land);
- e) The conversion of a part of the station to another use which is not station related (such as retail);
- f) The closure of part of or all of an approach road or footpath to the station.

1.4 Presumably the current consultation is founded on the basis that complete closure of ticket offices is deemed to be a minor modification. How so? On the

basis of 3 (b) above ? – this does not mention ticket offices at all. The scale of these proposals in no way constitutes a minor modification. In addition the notices at stations make no mention of the (statutory) procedure to be followed following any representations made.

1.5 Our view is that there should be a formal statutory closure procedure for each station on a case by case basis. There is a good case for a legal challenge/ judicial review of the reasonableness of the Secretary of State's decision to deem these proposals as minor modifications.

1.6 It seems to us that Transport Focus will be seriously challenged by the number and profundity of the responses to this consultation, especially given the impractical short timescales. This only serves to emphasise the legally flawed process that has been chosen.

1.7 We are concerned at the frugality of the consultation document. It is rather scanty and unhelpful compared with that for TransPennine Express.

2. Personal Ticket Sales and Journey Planning Advice at stations.

2.1 We are very concerned at the proposal to close all Avanti run ticket offices in our region and their replacement by Customer Ambassadors. In our view the proposal has not been properly researched: it seems to be a kneejerk reaction from the government of finding a way of reducing the cost of running the railway in England.

2.2 Many passengers need the comfort of a human face and advice when buying rail tickets - a complex task given the convoluted fares structure. For example whilst by no means unique, Preston has a variety of single (and return) fares to Lancaster. If the intending passenger wishes to purchase their ticket at Preston station, and ticket machines (TVMs) are the sole means of obtaining the ticket, the TVM must make it clear prior to purchase that some quoted fares limit which train the passenger may use. This important information will currently be provided by the ticket office clerk. If the passenger, in ignorance, chooses a non-permitted train there is a chance that a penalty of £100 will be applied. The grid below shows the available choices and prices -

Preston to Lancaster variety of fares			
Fare Setter	Anytime	Off Peak (from 09.00)	Valid on
Northern	£9.60	£8.90	Any train
Avanti	£8.40	£7.70	Avanti only
TransPennine	£8.20	£6.90	TPE only

2.3 The very complexity of fares and the unlikelihood of the fares structure being substantially simplified bolsters the case for retention of personal face to

face selling and offering the best deal for passengers. On-line ticket sales options can be more limited and the elderly and otherwise disadvantaged or vulnerable, not well versed in on line systems, are particularly appreciative of human assistance.

2.4 At many Avanti stations in the North West tourism is an extremely key and important part of the rail passenger market. Local people and visitors alike rely on physical interaction and contact with experienced professionals who are able to give informed advice.

2.5 The absence of a ticket office contributes to the perception of rail travel being too difficult. The message is that the government appears to be discouraging rail travel at a time when the weight of all the environmental and climate change considerations point in exactly the opposite direction.

2.6 Whilst accepting the fall in numbers of tickets retailed through a traditional ticket office, it is important to understand that the 'value' of a ticket office goes well beyond the sale of railway tickets alone. Ticket offices do much more than simply sell tickets. They give information, and public feedback invariably points to passengers appreciating the ticket office because they can get help and advice there. Despite this truism, especially where the elderly are concerned we are not aware of any demographic profiling of users of ticket offices. The lack of consideration of the wider implications also shows in the lack of analysis and value placed on the extent and time taken up by travel enquiries and planning. Revenue from sales alone does not give the complete picture.

2.7 We cannot understand how well used facilities can be replaced with Customer Ambassadors located in the station concourse or wherever. At many Avanti stations in our region our members note queueing on numerous occasions. The ticket offices have a full range of tickets available, which are not available or extremely difficult to find on-line.

2.8 For example the Avanti West Coast web site does not show off-peak returns between Carlisle and Glasgow, obtainable from the ticket office, which allow travel back via Kilmarnock using Scotrail and not fixed to a specific train time. Other products available from the same ticket office include day returns to the Tyne & Wear Metro (and presumably Manchester Metrolink) may not be available on the web. A further example - the ticket office at Carlisle has the facility to book through tickets from Carlisle to Douglas IoM via Heysham, including ferry reservations. How would such a booking be accomplished in future if the ticket office is to close?

2.9 Analysis of the proposals shows a startling contrast in the approach of Avanti compared with train operators in the South/South East. No less than 100% of Avanti operated stations in our region are proposed for ticket office closure compared with an average of 26% for operators in the South/ South East. But, even more telling, we have to look no further than within our own region where many ticket offices smaller or much smaller than the to be closed Manchester Piccadilly will remain open. These are the 18 Northern

stations which include Manchester Victoria and Manchester Oxford Road (both less used than Piccadilly!). What an indictment of railway fragmentation and incoherent passenger rail strategy!.

2.10 Interestingly there will be no cuts in Scotland and Wales, which is completely incongruous given we are dealing with a UK wide integrated rail network.

3. Customer Ambassadors & Ticket Vending Machines (TVMs)

3.1 If the Customer Ambassadors are to properly take the place of ticket office staff they will need to have comprehensive training and access to full ticketing and reservation facilities. This is not altogether clear in the documentation which states that staff will be on hand to provide support for all ticket types. We emphasise below the long period of training that ticket sellers require. Customer Ambassadors would need to be at a similar level of competency.

3.2 Many TVMs have a fuller range of tickets than was the case in the past but not as full a range as existing ticket offices. Taking forward the Preston to Lancaster example in paragraph 2.2 there are three different fares to Lancaster (Avanti, TPE, Northern). However, the cheaper TPE fare is not an option provided by the machine but it is offered at the ticket office.

3.3 Notwithstanding their shortcomings, as exemplified above, TVMs are not generally straightforward to use because they offer a wide range, though not full range, of products. The intricacies of finding ones way around them, especially for the elderly and disadvantaged make them a comparatively slower option than purchase from a human ticket seller and for them to be easier and quicker to operate the range of offer would have to be reduced.

3.4 However, the dilemma is that if they are to be the sole (or major) method of purchasing tickets on an Avanti station, they need to offer more - and indeed a full range of ticket choices - including products such as railcards, rover tickets and reservations. If the Customer Ambassador is not equipped with a device with which to purchase tickets, then the TVM is the only option, and unless it is upgraded as above then the customer will receive a worsening level of service. They would have to be much more wide ranging and sophisticated in their offer but the corollary is that this is likely to make them more complex and less user friendly.

3.5 Ticket sellers need to have a long period of training, no doubt in no small view down to the complexity of the fares system. This amount of knowledge and experience cannot be fully replicated in a machine which as said above has only a limited range of tickets available. The complexity of the ticketing system/ fares structure is not helped but indeed hindered by the offer from TVMs as they now stand

3.6 There are also real issues about vandalism and functionality of TVMs. For example one of our members has found when attempting to collect tickets ordered on line that at one ticket machine the letter B does not work and at

another one the letter B does work, but sometimes one of the other letters does not work. This entails a trip to the ticket office but if it is not there will Customer Ambassadors have the capacity to help?

3.7 We do not know whether Avanti is proposing to supply more TVMs to cope with demand. Not everyone can purchase tickets online however, and a smartphone is not a prerequisite of rail travel. There is certainly a risk to revenue and potentially, criminal proceedings - in the days of £100 penalty fares, to the passenger. Avanti do not appear to explain how this is going to be properly managed, which considering that in most new franchises the revenue risk stands with the Treasury and by extension the taxpayer, this we feel is not acceptable.

3.8 We also emphasise that this proposal excludes people who wish to or can only pay with cash. This again amounts to greater social exclusion in complete contradiction of societal trends.

4. Potential Outcomes

Other retail options

4.1 The consultation on Northern ticket office closures contains the following commitment - "customers will be able to buy tickets at local retail outlets. This will be rolled out over 12 months to thousands of locations". We cannot find any such reference in the sparse details in the Avanti proposals. This is regrettable and symptomatic of the fragmented, unintegrated nature of our railway system. Allied to remote retailers is the scope for ticket offices to remain and embrace other functions. For example there is the existing concept of combined convenience stores/ ticket offices. – this has been a successful venture on Merseyrail. This could be an even more advantageous solution at the generally larger Avanti stations e.g there is a branch of W H Smith close to the ticket office in Carlisle – could that be combined with the ticket office?

4.2 Station agents have been successfully operating at a number of small stations e.g. Gobowen (Severn Dee Travel) and a handful of others (many in Wales). This concept is focused on the needs of local communities, and in developing new sales opportunities. The Agent rents the station premises, and earns a commission of 9% on all ticket sales. Agents can also earn other revenue, from, for example, a small Station Service Store.

4.3 There are other joint ventures in some cases with CRPs involved. Local involvement can often create the environment for a more lucrative operation, encouraging rail travel with less call on financial support. Deserted ticket offices would be a big downside arising from all of this and this reinforces the need to look for alternative, ideally community led, uses which could well include ticket retailing as well as other activities benefitting the community. Not to give an exhaustive list but perhaps stations such as Oxenholme and Penrith could be likely candidates for this approach?

4.4 In the event of these closures taking place however, we would seek the following assurances:

4.5 A properly skilled enquiry officer should be located in a prominent place near the main entrance to stations to help with queues at TVMs and call forward more urgent enquiries, or people with disabilities e.g. partially sighted etc who need urgent help. The officer should be available, at least in the first instance, for the same times that the booking office was formerly open.

4.6 As we have said, many people find ticket machines difficult to use and in order to avoid them being penalised by the penalty fare regulations these should be decriminalised. Passengers should have the option of an easy to use, prominent Promise to Pay button that dispenses a ticket, allowing them to pay on the train using cash or card. This would help to meet DDA requirements.

4.7 All stations must have a working, reliable CIS on every platform, preferably with voice announcements for the benefit of the visually impaired.

4.8 Every train must have a conductor to assist passengers on and off the train, sell tickets, provide information and protect revenue. Conductors should be able to give cost – effective advice, be familiar with and able to sell the complete range of tickets on the train.

5. Conclusions

5.1 Without doubt, these proposals are a blow for passengers and will discriminate sharply against those more vulnerable members of society who rely on help from our transport providers. There is also a worry of course that the provision of Customer Ambassadors will be deemed to in fact offer only marginal value and their future not guaranteed.

5.2 We have pointed to some possible, small mitigations. However all stations have their individuality and going back to our introductory comments we believe this process is legally flawed and the only way of ensuring a fair and inclusive procedure is for each ticket office closure to be handled in accordance with the provisions of the Railways Act 2005 on a case by case basis.

Thank you for the opportunity to comment.

Yours sincerely,

John A Moorhouse

John Moorhouse
Company Secretary