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promoting quality public transport.....

Transport Focus
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Dear Transport Focus,

Train Station Ticket Office Consultation Northern

1 Introduction and Procedural Issues

1.1 TravelWatch NorthWest is an independent Community Interest Community representing all public transport users in North West 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. In our response we consider two major aspects – the loss of personal service facilities and the multi-purpose nature of ticket office staff at many stations where platform and passenger assist duties are also encompassed by ticket office staff.

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

2.1. 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

2.2 The very complexity 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.

2.3 By way of an example we know of an elderly lady, living in Clitheroe, who, following past closure of the excellent travel office at that station now has to travel as far as Preston station ticket office to obtain face to face advice on her travel plans. Closure of the Preston facility would of course deny her even that possibility.

2.4 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.

2.5 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.

2.6 Staff presence helps to deter anti-social behaviour. The much reduced hours of "Journey Makers" and consequent reduction in staff presence will result in more anti-social behaviour, including graffiti and damage to signs and infrastructure. This is a factor in making stations less attractive to customers. CCTV whilst welcome has its limitations, especially with regard to on-site response times.

2.7 Analysis of the proposals shows a startling contrast in the approach of Northern compared with train operators in the South/South East. No less than 88% of Northern staffed stations are proposed for ticket office closure compared with an average of 26% for operators in the South/ South East. What happened to levelling up?

2.8. 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.

Journey Makers & Ticket Vending Machines (TVMs)

2.9 The provision of "Journey Makers" is proposed to be for times much shorter than current staffing hours. There will of course be other hours in the day when passenger assistance regarding ticket purchase and/or travel planning is required The parsimonious provision of two-hour only shifts at 76 stations appear to be chosen at random or related to existing peak usage of

the ticket offices concerned. Fewer hours of coverage by the Journey Maker will mean a worsening for those passengers most in need of help – a core concern about these proposals. Will the Journey Maker have access to full ticketing and reservation facilities as is the case in ticket offices? This is far from clear in the documentation.

2.10 The question of location of the Journey Maker is important - shelter will be needed for both that person and passenger on wet and windy days. Indeed a ticket office/ sheltered location is obviously a much more preferred location to give advice from than standing adjacent to a TVM which may well be on an unsheltered platform. There is then the issue of TVMs on different well - separated platforms – how will one person cope in these circumstances? The ticket office is an obvious nucleus for all passengers to converge on.

2.11 Many TVMs have a fuller range of tickets than was the case in the past but not the full range as existing ticket offices. Taking forward the Preston to Lancaster example in paragraph 2.1 above 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.

2.12 Notwithstanding their shortcomings as exemplified above, TVMs are not straightforward to use because they offer a wide range, though not full range, of products. The intricacies of finding one's 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.

2.13 However, the dilemma is that if they are to be the sole method of purchasing tickets on a once staffed station, for much if not all of the time, they need to offer more, and indeed a full range of ticket choices, including products such as railcards, rover tickets and reservations. If the Journey Maker 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. We also understand that there are challenges with providing more sophisticated yet passenger friendly(ier) machines.

2.14 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.

2.15 We understand that Northern is not promising more TVMs so with current provision this will cause bottlenecks, especially at rush hour or when the station is busy. 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. Northern 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, we feel is not acceptable. There are also real issues about functionality and vandalism of TVMs.

2.16. We also emphasise again that we understand 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.

3. Multi-purpose staff at stations

3.1 There are stations on the UK network, which only offer level access because there are station staff present. There are many examples on the Northern network of such stations with level (step-free) access only via a gate-controlled foot crossing, which is locked and only usable by the public when accompanied by station staff. Journey Makers, if available to do this would have dramatically less hours of coverage than that seen currently. Therefore, this would result in a worsening of the stations accessibility by those with mobility difficulties, or indeed those who wish to take luggage across the line

3.2 Settle and Appleby stations are good examples of imposed inaccessibility when there are no station staff on duty. The ticket offices here are open for 10 hours each weekday and the ticket office staff also attend to passenger needs (those who are mobility impaired) crossing the line by the foot crossing, crossing over with the Settle Carlisle Railway Development Company's (CRP's) catering trolleys, as well as opening and closing waiting rooms and toilets. These stations (and there will be many others) will be rendered inaccessible when there are no station staff on duty for many hours in the day. Incidentally at these two stations the CRP has a contract with Northern to supply staff, supplementing the Northern coverage to enable the stations to open consistently for the period of time they do.

3.3. More limited station staffing hours would mean a reduction of help to passengers and this again flies in the face of societal trends towards greater accessibility and security for all. The very limited time limited presence of Journey Makers at many stations will be a serious curb on passenger assistance. The limited hours also give much more opportunity for increased vandalism and antisocial behaviour.

4. Potential Outcomes

Other retail options

4.1 We are interested in the reference to a proposal to sell tickets at more retail outlets ("customers will be able to buy tickets at local retail outlets. This will be rolled out over 12 months to thousands of locations"). We would suggest that business models for such ventures would have to be more attractive than perhaps hitherto. Allied to this 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.

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.

4.4 The processes of finding alternative uses for redundant station buildings must also be simplified and the DfT driven obsession with 'maximising income' should be relaxed. There has to be greater encouragement of independent station agents, either local entrepreneurs or community groups. There are a number of examples of 'community pubs', that are also Post Offices, shops, young children's creche's, pensioners clubs etc. There is no reason that selective railway stations could not perform similar multi-purpose uses.

4.5 In the event of these closures taking place however, we would seek the following assurances -

4.6 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.

4.7 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.

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

4.9 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 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 penurious, short period of time, provision of Journey Makers will be deemed to 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