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promoting quality public transport.....

Transport Focus
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Dear Transport Focus

Train Station Ticket Office Consultation TransPennine Express (TPE)

1 Introduction and Procedural Issues

1.1 TravelWatch NorthWest is an independent CIC 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 Finally we must say that TPE has produce a more comprehensive and indeed more passenger friendly consultation document than Northern and especially Avanti which is, to put it mildly, very scanty.

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

2.1 We are very concerned at the proposal to close Stalybridge and reduce the opening hours of Manchester Airport ticket offices. 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 Manchester Airport is an important International Gateway station. Many international Passengers arriving here require help and assistance. They are likely to be tired or jet-lagged and just wish to complete their journey in the easiest way. They will be used to ticket offices and staffing levels in their own country so will be unfamiliar with the UK's complex travel system. To cut hours would seriously impact on the welcome to visitors and exhibit a lack of customer care to our guests from all over the world. We are not familiar with plans for Heathrow, Gatwick or Birmingham as the other main international gateways but it is certainly damaging to the international tourism industry.

2.3 Many passengers need the comfort of a human face and advice when buying rail tickets - a complex task given the convoluted fares structure. 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 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 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. Ticket Vending Machines (TVMs) and alternatives

3.1 We are somewhat heartened to read from the consultation as follows

- That 67% of tickets sold at ticket offices that are available on the new TVMs will increase to 97% when planned upgrades to include advance purchase and car parking tickets are delivered. by December 2023.
- Where a customer cannot purchase a product online or from a TVM at their TPE station, they will be able to purchase the product from either another station that has a ticket office, from train operator contact centres that offer telesales or on-board.
- The small number of rail products that can currently only be bought from a ticket office will continue to be available for a time from a ticket office machine at all staffed stations to provide these products during station staffed hours.
- It is also somewhat mitigating that cash (which apparently amounts to around 35% of ticket transactions made at TPE ticket offices) will still be accepted at a limited number of stations that have cash TVMs or on-board trains.

3.2 Upgrades of TVMs are welcome but there is the question of the intricacies of finding ones way around them, especially for the elderly and disadvantaged. They do need to be much more wide ranging and sophisticated in their offer but the corollary is that this could well make them more complex and less user friendly. There are also real issues about vandalism and functionality of TVMs.

3.3 TVMs that accept cash are and will hopefully continue to be provided at Manchester Airport, Huddersfield, Dewsbury, Scarborough, and Hull Paragon. However most TVMs will not have cash facilities so there is a measure of

exclusion of 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 There is 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. Could Stalybridge ticket office embrace other functions rather than becoming an empty shell?

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. The processes of finding such alternative uses for redundant station buildings must also be simplified and the obsession with 'maximising income' should be relaxed. Perhaps Stalybridge could be a likely candidate for this approach?

4.4 In the event of these closures taking place however, we should be seeking the following assurances:

4.5 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. We are pleased that where passengers can only pay with cash, they will be allowed to travel before buying a ticket and to pay by cash on the train. Wider provision of cash TVMs would help to mitigate this situation.

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

4.7 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, this proposal to close ticket offices is a blow to passengers and is likely to discriminate sharply against those vulnerable members of society who rely on help from our transport providers. At last the measures that TPE is proposing to take to mitigate the situation appear to be better thought out than in the case of Northern and particularly Avanti.

5.2 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