

Sandra Ambo

From: Dr David A Berman (South East Rail Group) <david.berman2@southeastrail.org.uk>
Sent: 06 October 2018 17:59
To: Consultations
Subject: Planned closure of ticket offices at 51 London Overground stations

Importance: High

The South East Rail Group (SERG) would like to submit the following as a 'corporate' response to the consultation and would be glad if you would incorporate this into your formal response. We also have no objection to you passing this response on 'verbatim' to ARL and TfL.

SERG has no objections to the proposal with the following provisos:

- a. That stations remain staffed from first to last train, AND that at key stations consideration is given to extra staff presence at peak/busy times
- b. That consideration is also given for staff resources at stations where accessibility is an issue, such as those where staff would frequently have to assist passengers where there are very steep stairs involved. Examples being Finchley Road & Frognal, Stoke Newington, Stamford Hill, Hackney Downs, Dalston Kingsland, Bushey, Hatch End, Kentish Town West. This is of course not an exhaustive list.
- c. SERG would wish to see the following stations Gated as part of this process, in order to offer additional reassurance to passengers and to provide addition levels of Revenue Protection: Stoke Newington, Bruce Grove, Bushey, Cambridge Heath, London Fields, Silver Street, Walthamstow Queen's Road, Harringey Green Lanes, Finchley Road & Frognal, Caledonian Road & Barnsbury, Kentish Town West, South Hampstead, Headstone Lane and Wandsworth Road. This list is arranged in what SERG considers to be Business Case order.

I would be grateful for an acknowledgement of receipt for this email.

Regards,

David Berman

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Sandra Ambo

From: Jane Earl <jane.earl57@gmail.com>
Sent: 12 October 2018 14:22
To: Consultations
Cc: unmesh.desai@london.gov.uk; Denise Jones; Abdal Ullah; Emma Blint
Subject: objection to remoc=val of staff ormticket office at Wapping overground station

Dear London Travelwatch

On behalf of St. Katharine's and Wapping Labour Party and users of our station, we would like to submit our comments on the proposal to remove staff from the ticket office at Wapping. We object to the proposal and urge you to retain the current arrangements.

We have spoken to a large number of people who use the station, and have run an online petition, which has been signed by over 140 people. The petition can be found by following this link: – <https://www.change.org/p/mayor-of-london-keep-wapping-station-ticket-office-staffed>. Comments left by supporters of the petition include the following

“I feel very safe at Wapping Station because it is well staffed and well cared for and you can always find a member of staff in the ticket office. Safety is particularly important for older people, younger people and children and women”

“Having a staff presence at Wapping Overground station and in the ticket office is a vital service to the local community, especially for the more elderly and those with limited mobility”

We also collected over 50 signatures for a petition in the following terms:-

"Keep Wapping Ticket Office Staffed

Petition Summary: We the undersigned are concerned residents who urge the Mayor of London to keep Wapping ticket office open for people with limited mobility, parents with children and those who value the support of staff on site".

We urge you to keep the ticket offices staffed and look forward to receiving a full report on the outcome of the consultations and the proposed course of action

Yours faithfully

St Katharine's and Wapping Labour Party

TO DARE IS TO DO

By email: to consultations@londontravelwatch.org.uk

11 October 2018



Dear Sirs

**Consultation on Proposed Closure of London Overground Ticket Offices
(White Hart Lane and Bruce Grove Stations)
Comments by Tottenham Hotspur Football Club**

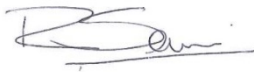
The Club has reviewed the 'Information in support of a Statutory Consultation regarding a Major Change Proposal' and wishes to make the following comments:

1. The new Tottenham Hotspur Stadium is nearing completion. The Club's old White Hart Lane Stadium, which had a final capacity of approximately 32,000 was demolished shortly after the final game against Manchester United on 14 May 2017. The Club played all of its 'home' games at Wembley Stadium during the subsequent 2017/18 season. We note in this context that the survey period for closure assessment purposes was 24 June 2017 to 23 June 2018, during which time there were no football matches or other major events at White Hart Lane.
2. White Hart Lane Station is by far the closest of the four stations serving the new stadium (the others being Northumberland Park, Seven Sisters and Tottenham Hale). Approximately 5,000 spectators typically came through White Hart Lane Station for a football matches at the old White Hart Lane Stadium. That figure is forecast to rise to nearly 13,000 with the new stadium for a typical 3.00pm Saturday kick-off.
3. The first point we must raise therefore is that the adopted survey period used to assess the closure of the White Hart Lane ticket office is not an accurate indication of either the station's historical or future throughput and correspondingly, average ticket sales. Any assessment must be based upon a more representative measure of average ticket sales, i.e. taking full account of its historic and forecast event day passenger numbers. A more representative assessment would almost certainly indicate a breach of the 12 transactions per hour threshold, which appears to have been adopted as the primary justification for the proposed closure.
4. In addition to increased ticket sales associated with event day usage of White Hart Lane Station, account should be taken of the additional leisure uses being introduced to North Tottenham by the Club that will generate significant footfall all year round. Specifically, the first phase of the 'Tottenham Experience' will open alongside the new stadium and amongst other things, will incorporate the Club's new museum and megastore. The Club has commenced the development of a 180 bed hotel and also has planning permission for an extreme sports hub and 585 homes.
5. The Club seeks confirmation that in the event of the closure of the White Hart Lane Station ticket office, event day staffing levels – particularly at gate lines and platforms – will not be impacted in any way and that the enhanced event day staffing proposed by London Overground/Arriva is maintained to ensure safe and efficient loading of the station and maximisation of the additional capacity being made available with the introduction of new rolling stock in 2019.
6. Although not promoted by the Club as an event day station, the same reassurance is sought in respect of Bruce Grove Station, which also experiences higher event day passenger numbers.
7. The Club seeks confirmation and reassurance that in the event of the closure of the White Hart Lane Station ticket office, a sufficient number of mobile ticket officers will be deployed to deal with spectator ticket sales and enquiries in order to ensure safe and efficient loading of the station.

8. The assessment in respect of White Hart Lane Station does not appear to take into account the £18m redevelopment of the station which, amongst other things, includes a new ticket hall. In addition to supporting the new Tottenham Hotspur Stadium, the redeveloped White Hart Lane Station will be the principal gateway to Haringey Council's High Road West regeneration scheme that will comprise at least 2,500 new homes together with significant leisure and employment floorspace.
9. Finally, the Club must take this opportunity to reiterate its request that London Overground/Arriva consider the introduction of male, female and accessible toilets within the new station that are accessible on both event days and non-event days.

The Club therefore **objects** to the closure of the White Hart Lane Station ticket office and would welcome the opportunity for further dialogue with London Overground/Arriva.

Yours faithfully



Richard Serra MRICS MRTPI
Head of Planning

cc Joseph Uzoka – Transport for London
Helen Fisher – Haringey Council

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Football & Athletic Co Ltd**
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Registered Number: 57186 England

Sandra Ambo

From: Michael Green <Michael.Green@thstofficial.com>
Sent: 11 October 2018 14:49
To: Consultations
Cc: Michael Green; Jonathan Waite; Katrina Law; Martin Cloake
Subject: Closure of White Hart Lane station ticket office

Dear London TravelWatch

I am responding to your consultation on behalf of the Tottenham Hotspur Supporters Trust (www.thstofficial.com) concerning Arriva's proposal to close a number of ticket offices on the London Overground and specifically the closure of the ticket office at White Hart Lane station.

As I am sure you are aware, Tottenham Hotspur will shortly be moving back to a new stadium built essentially in the same location as its old White Hart Lane stadium. Before closure the old stadium had a full capacity of 36,000 spectators; the new stadium is nearly double that at 62,000. Outside of matchdays it is likely there will be a considerably larger number of additional events (e.g. NFL games, concerts) taking place at the new stadium than there ever were at the old. White Hart Lane is the nearest train station (Overground or National Rail) to the stadium site.

Our concerns/comments are the following:

- It seems precipitous to close the WHL ticket office just as that part of Tottenham is about to welcome visitors in numbers not seen since at least the 1960s.
- Passenger usage has not been tested under previous match day conditions let alone in the changed circumstances of significantly increased capacity. The evidence presented in support of closure cannot therefore be considered reliable.
- The proposals are light on detail on replacement facilities. Before acquiescing with closure respondents will need to know the proposed number of ticket machines on hand and the number of staff proposed to be working in the ticket hall on matchdays to accommodate the substantially increased usage of the station.
- In any event, it would appear sensible to keep the ticket office open until at least the end of the current football season to test demand under matchday conditions.
- During this time staff in the ticket hall should complement a manned ticket office rather than replace it.

Regards

Michael Green
Board Member, THST

Sent from my iPhone

Consultation on the closure of 51 London Overground ticket offices

Transport for All have serious concerns regarding the closure of 51 London Overground ticket offices. We believe that closing ticket offices will have a profoundly negative impact upon of Disabled and older people's ability to access the Overground.

Given our experiences with the closure of ticket offices on the Underground a few years ago, we expect that the results of doing the same on the Overground will be very similar: more barriers for Disabled and older people, decreased feelings of confidence and safety, and more confusion for all passengers.

The barriers caused by the removal of Underground ticket offices continue to be raised at Pan London Mobility Forums. We are especially surprised about this proposal in light of comments made by Mark Wild, London Underground Director, who admitted during our Biennial General Meeting that *"when [they] closed the ticket offices [they] probably went too far"*.

Many Disabled and older people, including those with a learning difficulty; visually impaired people; Deaf and hard of hearing people; and those who are simply unfamiliar with computers find it difficult or impossible to use ticket machines – especially when making more complicated requests, such as registering a Disabled Person's Railcard to an Oyster.

Our members have told us stories of being harassed by fellow commuters for 'taking too long' when purchasing tickets via a machine during busy times. Some Disabled and older people require more time to use a machine than non-Disabled people and we are concerned that the removal of ticket offices will only create more opportunities for Disabled people to encounter harassment. The availability of a ticket office is a lifeline for those people who don't want to go through the difficulty of trying to use a machine.

It is also particularly difficult for hard of hearing passengers. Ticket offices use the loop system. Closing the ticket office takes away their only means of communication in a noisy environment.

Without the fixed point of a staffed ticket office, visually impaired people will find it harder to locate staff to assist them; especially since there is no staff point, and staff still don't wear high-vis uniforms.

Our members have expressed serious concerns about their ability to travel on the Overground at all without ticket machines. For those who have mobility or dexterity impairments it can be impossible to operate buttons and touchscreens, handle change and collect tickets on their own.

Another key issue is the limited information a ticket machine can provide in comparison to a staffed ticket office. Ticket machines do not tell Disabled people which station on each journey is the cut off for the Freedom Pass and where the Disabled Person's Railcard journey should commence from and return to. People rely on ticket office staff for this in order to avoid paying an unnecessary extra overlap in journey fare when the Freedom Pass covers only part of the journey.

Whilst we appreciate Arriva Rail London's dedication to having staff at every station, from the first train to the last, we cannot see the closure of ticket offices as anything other than a step backwards in terms of accessibility.

About Transport for All

This response has been submitted on behalf of Transport for All. Transport for All (TfA) is the organisation of disabled and older people dedicated to champion the rights of disabled and older people to travel with freedom and independence in London. TfA is a membership organisation and a registered charity. For more context about TfA please [visit our website](#).

Our response has been informed by our members and trustees.

Transport Salaried Staffs' Association

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f 020 7383 0656
e enquiries@tssa.org.uk

London TravelWatch
169 Union Street
London
SE1 0LL

12th October 2018

By email to: consultations@londontravelwatch.org.uk

Dear Sir or Madam,

RE: ARRIVA RAIL LONDON (LONDON OVERGROUND) PROPOSAL TO CLOSE 51 TICKET OFFICES

I am writing to you in connection with the above matter.

TSSA is recognised by Arriva Rail London (ARL) for collective bargaining purposes and has been involved with protracted industrial relations discussions in connection with the company's proposal that, of the 65 stations with ticket offices, it intends to close 51 of them. This letter is our response to the Schedule 17 consultation and from the start we want to make clear our opposition to the company's proposal.

In our view, ARL's proposal is using the Schedule 17 process as a smoke screen when the real agenda is about making savings without regard to the consequences in terms of customer service assistance to passengers or the personal security and safety of both rail users and staff.

Our opposition is based on several factors including:

- A failure to recognise the unmeasured parts of ticket office duties;
 - A failure to properly assess each station and its unique facilities, location or circumstances;
 - A failure to carry out risk assessments of the threats to passengers and staff consequent on the implementation of the proposals;
 - A failure to consider the unique characteristics at different stations.
1. **A failure to recognise the unmeasured parts of ticket office duties: Inadequate information in the consultation**

The company's plan is based on the number of sales per hour at its ticket offices with the proposal being to close those that sell less than 12 tickets an hour. However, what this single activity hides are the other, unmeasured, services carried out in the ticket offices

www.tssa.org.uk

Members' helpdesk **0800 3282673**
General Secretary **Manuel Cortes**



that include:

- the provision of advice to passengers about fares, routes and prices of travel;
- the offer of choice as to whether to use the ticket office or TVM (TSSA members have reported that many TVM users seek reassurance from ticket office staff that they have purchased the correct tickets);
- dealing with queries associated with the TVMs (Ticket Vending Machines) and tickets bought online;
- provision of information at times of disruption;
- playing a part in revenue protection;
- being a focal point where passengers can seek assistance with personal security.

On this basis, TSSA would ask London TravelWatch to recognize the inadequacy of ARL's chosen measure and to accept that this alone is not truly reflective of the service provided to passengers.

2. A failure to properly assess each station and its unique facilities, location or circumstances

ARL has failed to properly assess the impact of their proposal at each station. We can make this claim on the basis that the company has failed to risk assess how their scheme will impact on passengers or staff. Consequently, the TSSA and RMT union staff representatives (ARL employees) have carried out a series of visits to every affected station and their combined reports are attached to the email that forwards this letter to London TravelWatch. The reports show, for instance, that:

- Crime figures in the stations provided to staff reps (but not available in the public domain through the Schedule 17 consultation document) only covers 2017 so cannot be compared with what went before or has happened to date in 2018.

Each report, however, records staff feedback in terms of crime, noting the extent of issues that take place (eg, physical and verbal assaults on staff and passengers and anti-social behavior);

- Crime figures around the stations, based on Metropolitan Police information, have not been provided by ARL. What we are aware of is that crime outside the station can find its way onto the railway and then affect passengers and staff: recently, this has included two instances of gun crime, a stabbing (on a train) and a rape (in April) plus issues of begging due austerity;
- CCTV coverage, where installed, is often from the ticket office but when not being monitored, creates blind spots at a number of stations;
- Footfall data is inaccurate meaning that an assessment of the number of passengers using each station is impossible. At many stations the absence of this information highlights problems with crowd control, exasperated when queuing systems conflict with passengers trying to get on the platform to catch their trains

(eg, at Crystal Palace and Willesden Junction). At some stations, there are no queuing systems (eg, Crystal Palace, Hackney Central, Highbury and Islington);

- Repetitive strain. At some stations that are significant numbers of platforms, entrances and exits, as well as numerous steps up long stair cases, all of which have to be navigated (eg, at Crystal Palace and Hackney Downs). Where staffing has been cut, this means that one person may have to endure this daily physical ordeal, potentially leading to repetitive strain injuries;
- Lone working. Even with the current station staffing at some stations, workers often find that they can spend long hours apart from colleagues as they perform their duties. The reports highlight current concerns about lone working and fears about personal safety when, for instance:
 - carrying out security checks
 - dealing with TVMs
 - opening and closing the station
 - at times of anti-social behavior or the presence of gangs
 - when working on or around the station, the place of refuge can be a long distance away and not immediately accessible in an emergency
 - the standard of the refuge and whether it is a secure place of safety (eg, is it a solid building with a secure door - or a temporary structure) - and even if the member of staff has a key to be able to get into it
 - access to panic buttons


This is in addition to the strain that employees feel when they are pulled in multiple directions as they carry out a variety of duties, including dealing with disruption and unhappy passengers.

It should be noted that Arriva Rail London's employee policy on lone working by employees is six years out of date and does not cater for the current circumstances with the absence of Revenue Protection Inspectors (RPI), Travel Safe Officers (TSO) or Guards on trains. The policy, therefore, is completely inadequate for the ticket office closures programme and means that staff feel unsafe in their work. This is another failing by ARL in its rush to get its proposal implemented.

- Many of the union reports attached to the accompanying email also put the station in the context of what surrounds them in terms of colleges, shopping centres and sporting venues. Some also highlight the presence of pubs and bars serving alcohol. We will develop this point further later in the response to highlight additional factors that we would ask London TravelWatch to consider in its analysis in relation to specific stations.

The reports are important - and should be taken note of - because they expose the areas that ARL has failed to assess which further undermines their focus solely on ticket sales to justify closing 51 tickets offices.

The company also appears to have failed to carry out risk assessments as they are obliged

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to under the Management of Health and Safety at Work Regulations 1999. That assessment would have picked up a number of these workplace concerns and how they have the potential to affect passengers. Risk assessments are supposed to be carried out with trade union input but ARL has not approached TSSA, one of the reasons why the attached reports were produced.

The point to note from the above is that with ticket offices closing, at many stations there will only be one member of staff on duty at any one time, exasperating the issues described.

To illustrate our claim and the impact it will have on passengers:

- **Personal Security:** Where only one person is on duty for much of the operational day (eg, Hackney Central, Shoreditch High Street, West Hampstead), that person will have to deal with all of the duties and issues that arise on their own without any immediate support.


Our members have already reported an increase in anti-social behavior because staff employed as RPIs, TSOs and Guards on trains are no longer present to deal with ticketless travel, a situation compounded by a lack of British Transport Police presence at stations.

Currently, the presence of a member of staff in a ticket office not only provides reassurance that in the event of trouble, a passenger can seek immediate assistance, but it also enables the person working on the platform to know that they have not been left alone to deal with very difficult situations.

When the ticket office is closed and the staff dismissed or re-deployed elsewhere, a passenger needing assistance will have to find the busy railway worker somewhere on the platform (and some stations have multiple platforms). The closure of the ticket office also means that no one is likely to be monitoring the CCTV in real time and so able to immediately call the emergency services;

- **Queuing:** The closure of the ticket offices will also result in longer queues at TVMs which, as the TSSA/RMT reports show, at some stations can conflict with passengers trying to get on the platform.

Where only one person is on duty, competing priorities means that choices have to be made about whether to deal with travel queries and problems with the TVM or to manage issues of crowd control. Whatever the employee does, there is always the potential for a fraught situation to develop as passengers frustrated with the lack of information or the inability to deal with a TVM query take second priority to crowd control issues because of the health and safety risks on a busy platform.

- **Availability of information:** In addition, passengers seeking information will no longer be able to ask at the ticket office. The withdrawal of the current service means that a dedicated information service will be lost which contradicts ARL's
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claims to be offering “an improvement on current arrangements in terms of quality of service.”ⁱ

- Deterrence to travel: anti-social behaviour acts a deterrence to travel for many passengers. London Overground has previously been able to deal with this issue by the presence of appropriate numbers of trained staff, backed up by the BTP. As noted elsewhere in this response, however, TSSA members report that the situation has got worse again following the loss of staff employed as RPIs, TSOs and train guards - and will deteriorate further as staff are removed from station ticket offices.

3. Arguments to retain ticket offices at specific stations

We would argue that there are specific grounds and additional factors why ticket offices at the following stations should be retained:

Brondesbury	Gospel Oak	Kensington Olympia
Camden Road	Hackney Central	Shepherds Bush
Canonbury	Hackney Downs	Shoreditch High Street
Dalston Junction	Hackney Wick	Surrey Quays
Crystal Palace	Hampstead Heath	Watford High Street
Dalston Kingsland	Homerton	West Hampstead

Reasons:

1. Security checks: During security checks the station layout leaves staff a long distance from their place of refuge (all stations above) meaning that they are more at risk;
2. Issue resolution: London Underground stations opposite the Overground stations send customers to resolve issues adding to workloads for ARL staff (eg, at Camden Road, Shepherds Bush, Shoreditch High Street, Surrey Quays and West Hampstead);
3. Disability access: Lifts at stations have seen an increase in MIPs (Mobility Impaired People) and VIPs (Visually Impaired People). This welcome installation gives an extra responsibility for ARL station staff to ensure boarding and lighting trains is carried out safely, something that needs to be prioritised when trains arrive at stations. The issue affects stations at: Brondesbury, Camden Road, Canonbury, Dalston Junction, Gospel Oak, Hackney Central, Hampstead Heath, Hackney Wick, Shepherds Bush and West Hampstead);
4. Increase in footfall: Shopping Centres close to stations have led to an increase in footfall at the station making them busier (eg, at Camden Road, Dalston Kingsland, Shepherds Bush, Surrey Quays and Watford High Street);

5. Presence of hospitals: Hospitals increase numbers in peak due to appointments (eg, Hampstead Heath (Royal Free Hospital) and Homerton (Homerton Hospital));
6. Terminating trains: Trains terminate at the station (eg, at, Camden Road, Crystal Palace, Dalston Junction, Hackney Central, Hackney Downs, Hackney Wick, Shepherds Bush);
7. Connection: A walk way connects Hackney Central and Hackney Downs Stations meaning that people can transfer between each;
8. Dealing with the trains from other companies requires a knowledge of the fares available from operators such as on GTR Southern (Crystal Palace, Kensington Olympia and Shepherds Bush);
9. Interchange stations: There are a number of stations that enable an interchange between different routes, not only making the station busier but also enhancing the need for a ticket office to be available to give advice about travel options like routes, tickets and fares (eg, Canonbury, Dalston Junction, Gospel Oak, Hackney Central, Hackney Downs);
10. Sport: The presence of football grounds close to the stations increases footfall when games are on and means that fans want advice about the cheapest and most appropriate tickets to get them home after the match. Watford FC's ground, Vicarage Road, is near Watford High Street whilst Hackney Wick is close to West Ham United's 82,000 capacity London Stadium. Surrey Quays Station serves Millwall FC's Stadium (The Den).

4. Issues with Ticket Vending Machines

ARL has installed a number of additional Cubic and Worldline TVMs in place of the ticket offices that the company wants to shut. In support of this, it has presented in its Schedule 17 consultation document details of the performance it receives from the current TVMs.

Despite these impressive results, TSSA wants to highlight the unreliability of Cubic TVMs as we are informed that they receive a certificate of competence if they can work for four 4 weeks without breaking down: to date, none has managed to on the Overground network.

We would also highlight that there have been numerous examples of the new machines not refunding cash that has been paid into top up Oyster Cards. For example, £5 is put into the machine which then doesn't apply it to the Oyster Card. In some instances, this has been down to the passenger failing to follow instructions but on others it has been an issue within the machine which ticket office staff then have to deal with through contacting the TVM operator. The machine operators refer to the problem as "hijacking" because the machine pays the cash entered to the next person topping up. The issue is still unresolved but the point is that without the ticket office staff being available, TVM problems like this would not be remedied, adding to passengers' frustration.

TSSA would also question how the new TVMs work and whether they are a real replacement for ticket offices. In general, we are concerned that TVMs don't give travel advice (eg, on routes, appropriate ticketing types and cheapest fares) and often sell the most expensive tickets first.

Another point to make is in relation to contactless payments. When queries arise about whether someone has used their card or mobile phone to make a contactless payment, there is no way for the ticket office staff to be able to check if the transaction took place. Revenue Protection staff have a device that can check whether the card has been charged (or not). The fact that the ticket office cannot check exposes passengers to penalty fares when they get on the train or at the station without a ticket. The ability to carry out the checks should be available in the ticket offices.

ARL ticket offices are able to offer cash and card refunds to passengers at present (eg, if they purchase the wrong ticket) but one of the effects of the ticket office closures is that cash refunds will no longer be available. The withdrawal of the cash facility means that passengers who require a refund may not be able to travel until they get their money back, undoubtedly adding to their frustration, especially if they have been unable to obtain travel advice in the first place.

Instead, we believe that people should be given the option to secure the advice (and, where necessary, appropriate refund) that they need from a ticket office worker who can ensure that the passenger pays the right and cheapest fare for the most appropriate route.

5. Parallel cuts in public transport

It is also worth putting ARL's proposal in context because it comes amidst a series of other negative changes to transport in London, all of which will potentially impact on passengers by reducing travel options at the same time as removing access to information about timetables, routes and fares. For instance:

- The London Mayor has recently announced a review of the Central London Bus Services with a public consultation due to close in early November. The effect of that proposal, when implemented, will see a 9% reduction in bus services and changes made to 33 routes.ⁱⁱ Changing bus routes and reducing services at the same time as cutting ARL ticket offices means that passengers may want to use London Overground more often but will have to endure a lack of information about fares and tickets as well as the security risk of anti-social, and even violent, behavior at stations;
- At the same time, Transport for London has entered into consultation with TSSA (as the recognised trade union) about a scheme to change the opening hours at its eight Visitor Information Centres (VICs). Proposed staff rosters will see a one hour reduction in opening times at each end of the day during the Winter (reduced from 0800-1800 to 0900-1700) whilst in the Summer, rotas have been adjusted to cut morning opening times (but four of the VICs will open for 30 minutes later). What this means is that an alternative source of face to face travel information will be

reduced just when ARL are proposing to cut the same advice outlets (ticket offices) from most of their stations.

Conclusion

TSSA calls on London TravelWatch to recognize that the information provided by Arriva Rail London is inadequate to safely proceed with the closure of 51 of the company's ticket offices. In our response we have attempted to show that there is a lot more to consider than simply the number of tickets sold per hour. We have also sought to make it clear that there are a number of genuine safety concerns that will affect passengers and staff, worsening an already deteriorating situation. What we want to see is the provision of a rail service that passengers want and can safely use and not one where the company dresses up a cost cutting exercise as an advance in customer service.

Yours sincerely

Rob Jenks
Policy Advisor

ⁱ See Page 7 of Schedule 17 consultation document

ⁱⁱ Available at: <https://consultations.tfl.gov.uk/buses/central-london/>

*West Hampstead Amenity & Transport Association
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NW6 2PS*

*Tel (m) 07946 511513
Email saynor9@gmail.com*

10 October 2018

**Consultations
London TravelWatch
169 Union Street
London
SE1 0LL**

**Copy to:
Deputy Mayor for Transport in London
Andrew Dismore, AM**

Dear London TravelWatch

Closure of London Overground Ticket Offices, including West Hampstead

I write on behalf of West Hampstead Amenity & Transport (WHAT), West Hampstead's oldest amenity group, established over 40 years. Our members, local people and interchange passengers are very concerned about the prospective closure of our London Overground ticket office, and this letter is a formal objection to the proposal.

West Hampstead Overground station – on the latest available figures – handles around 5 million passengers per year – more than 97% of the other stations on the national rail network. It is therefore in the top 100 of the 2,600 British railway stations. Other Overground stations are even busier – for example, Shepherd's Bush has nearly 8 million, which puts it in the top 60 and several others, such as Camden Road, Dalston and Hackney are also in the top 100. If stations that are this busy cannot justify a ticket office, then that does not hold out much hope for many hundreds of other stations around the network.

This station is used by a wide variety people of different ages and capabilities who live in our very diverse area. There are young families as well as old and disabled people. Many older people have written to us to say how much they value the personal service provided by the ticket office staff, some of whom have worked at the station for many years. An important function of the station is to sell National Rail tickets to destinations elsewhere in the UK, and there are many users who lack the facilities or ability to buy train tickets electronically.

The station is used by a wide range of overseas visitors and others travelling overseas when travelling via interchanges to Gatwick and Luton airports. Local residents themselves – including many EU workers and their families – travel around the UK a great deal and use the ticket office to buy their rail tickets. Many passengers interchange between rail and tube and need help and assistance, especially as there is no ticket office at the tube station. The station is located in a prime location, with high pedestrian footfall, close to the tube station. It can therefore help fill the gap left by the closure of the tube ticket office.

As a result, the ticket office deals with many enquiries about rail journeys and fares that will not be recorded in the electronically-gathered usage data provided by Arriva. This data also fails to reflect the value of the tickets sold, especially national rail tickets. We would therefore submit that the statistics that show a usage of less than 12 transactions/hour is misleading in terms of the actual usage and value of the station.

There are many ticket types that cannot be purchased from a ticket machine, and, the closure proposal therefore represents significant detriment to passengers. They include:

- 7 day or 1 month paper travelcards (lot of purchases at WH)
- Child Oyster season tickets (not available at tube stations)-
- Railcards (5 types, incl Senior)
- Tickets sold using a Warrant
- Annual Oyster cards
- Excess fares
- Replacement tickets that have stopped working
- Refunds on unused tickets
- Duplicate tickets that have been lost
- Reservations
- Advance Tickets

Local experience (contrary to the Arriva statistics) is that the new ticket machines do break down regularly, typically with software problems. Moreover, West Hampstead currently has two different (albeit very expensive) machines, with confusingly different user interface.

Reflecting its importance, West Hampstead station is currently being rebuilt with step-free access, a project that WHAT has championed since its inception. The new station, although much more capacious, is of an open air design, and is likely to be unpopular with staff if they have to remain in a draughty location without being able to advise passengers from inside the ticket office. It would seem to be “spoiling the ship” to open the new station without proper ticket buying facilities for passengers of all abilities.

Everyone in our area has experienced what happened when our Tube station lost its ticket office. The ticket barriers remained open and unstaffed for long periods (as it was today) as staff drifted away from what had become an unattractive job. While there is a ticket office at West Hampstead Thameslink station, this is often unstaffed, and, to be frank, the staff there are less helpful. As a model of a well-run station, it would be a great pity if our brand new Overground station were to become degraded in this way.

I attach a petition to keep the ticket office open, signed by many local people.

Therefore, I would request that LTW asks TfL to consider the list of Overground ticket offices proposed for closure, and at least consider saving some of those at the more important stations.

I would just like to draw attention to one further matter which I feel LTW should raise with TfL. I think it is incumbent upon a public body such as TfL to communicate with its customers in an open and honest way, and I submit that its promotion of the ticket office closures has been misleading. The proposals are described as “Modernisation of Customer Service”:

<https://consultations.tfl.gov.uk/london-overground/ticket-offices/>

This is incorrect, as customer service is not being modernised or improved. Indeed, quite the reverse is the case, for the reasons given above. The Overground system already delivers excellent customer service (arguably among the best in the UK), and the TfL and Arriva documentation contains no proposals for improvement. The Arriva Statutory Consultation Submission document simply describes the closure proposal, and offers no additional services other than those specified in the TfL/ARL Concession Agreement. The TfL web page even fails to list the ticket offices to be closed, leaving this task to the LTW web page.

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Finally, I should like to thank Tim Bellinger of LTW for some very helpful guidance.

Yours sincerely

John Saynor
Chair, West Hampstead Amenity & Transport Association (WHAT)

Petitions text

1) Carpenders Park

PETITION TO STOP THE CLOSURE OF CARPENDERS PARK STATION TICKET OFFICE

To Transport for London

We the undersigned strongly object to the closure of the ticket office at Carpenders Park station, believing that it will make it more difficult to buy the right ticket, increase safety fears for many passengers and lead to more difficult travel for passengers with disabilities.

2) Honor Oak Park

PETITION TO SAVE OUR TICKET OFFICE AT HONOR OAK PARK STATION

We the undersigned are calling on London TravelWatch to abandon proposals to close the ticket office at Honor Oak Park train station. The ticket office is a welcome part of our local community and provides essential services for people who either don't have access to the internet or would prefer to do transactions face to face.

3) RMT

Keep ticket offices open on London Overground

To: Arriva Rail London and Transport for London

Our Ticket Offices on the London Overground must be kept open

Why is this important?

Arrival Rail London and Transport for London have recently launched a public consultation on their regressive plans to close 51 ticket offices on the London Overground Network.

[http://www.londontravelwatch.org.uk/news/view?id=715&x\[0\]=news/list](http://www.londontravelwatch.org.uk/news/view?id=715&x[0]=news/list) (Consultation closing date 11th October)

Staffed ticket offices are vital on our rail network as ticket vending machines simply do not offer the range of tickets many passengers need, often overcharging people in the process:

<https://www.thetimes.co.uk/article/ticket-machines-still-ripping-off-rail-passengers-says-watchdog-3vgjcllbf>

Passengers at unstaffed stations also face regular delays to buy tickets as there are rarely enough ticket vending machines to meet demand at peak times.

Station staff in ticket offices also regularly provide a point of human contact for passengers improving safety and enabling disabled passengers to travel with confidence.

Proposed ticket offices to be closed are: Acton Central, Anerley, Brondesbury, Brondesbury Park, Bruce Grove, Bush Hill Park, Caledonian Road & Barnsbury, Camden Road, Canonbury, Carpenders Park, Clapton, Dalston Kingsland, Dalston Junction, Finchley Road & Frognal, Gospel Oak, Hackney Central, Hackney Downs, Hackney Wick, Haggerston, Hampstead Heath, Hatch End, Headstone Lane, Homerton, Honor Oak Park, Hoxton, Imperial Wharf, Kensal Rise, Kensington (Olympia), Kentish Town West, Kilburn High Road, Penge West, Rectory Road, Rotherhithe, Shadwell, Shepherds Bush, Shoreditch High Street, Silver Street, South Acton, South Hampstead, Southbury, St James Street, Stamford Hill, Stoke Newington, Surrey Quays, Theobalds Grove, Turkey Street, Wapping, Watford High Street, West Hampstead, White Hart Lane and Wood Street.

Please sign this petition and help us keep London Overground's Ticket Offices open.

4) West Hampstead Amenity and Transport

Stop Closure of Overground Ticket Offices in West Hampstead and Elsewhere

To: Deputy Mayor for Transport in London, Heidi Alexander / Arriva Rail London

TfL wants to close our Overground ticket offices at West Hampstead, Brondesbury and Finchley Road & Frognal and at almost every other Overground station - just like it has already closed all the Tube ticket offices. There is currently a "consultation" taking place and we urge you sign this petition and to respond to the London Travelwatch "Consultation" by 12th October:

<https://consultations.tfl.gov.uk/london-overground/ticket-offices/>
<https://www.surveymonkey.co.uk/r/cdvzwtm>

Why is this important?

Our ticket offices provide an incredible valuable service to residents and to the many thousands of people who interchange between tube and other rail services every day. The helpful staff sell tickets for any rail journey in the UK. They provide an enquiry and Oyster top up service, to fill the gap left by the closure by Boris Johnson of our tube station ticket office. They provide help for the many visitors from abroad who travel through West Hampstead. Members of the local amenity group, West Hampstead Amenity & Transport, have told us that, if they could not easily buy mainline tickets, they would go by car instead.

When our Tube ticket closed, the busy tube station at West Hampstead was - and still is - frequently left unstaffed with the barriers open. It seems that this was caused by former ticket office staff leaving and not being replaced. This in turn encourages crime and anti-social behaviour by allowing anyone to enter the system without a ticket. The same thing could happen on the Overground, which is one of the most successful rail projects anywhere in the country.

TfL's website states that this is a "Modernisation of Customer Service", whereas in fact no improvements are specified in the documents that they have supplied, and the move will worsen the service for passengers who need help and/or those who need to use a ticket office. The proposals appear to have been based on inaccurate figures for the number of tickets sold and they fail to reflect the value of having a national rail enquiry office in local communities.

If this methodology were used on the whole national railway system, there would be hardly any railway ticket offices left across the whole country, and whole swathes of the UK would be without a retail facility for purchasing tickets.

Finally, if the ticket office at West Hampstead is closed we've been told that the ticket office in the new West Hampstead Overground station will be built! The station is under construction at the moment, and the design of the station will be changed to exclude a ticket office from the building project.

Therefore, we must fight the plans.

It will be delivered to the Deputy Mayor for Transport in London, Transport for London, London TravelWatch and Arriva Rail London