
Secretariat memorandum

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Agenda item 8

LTW595

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Closure of London Overground ticket offices – public consultation

1 Purpose of report

- 1.1 To advise members of the outcome of the public consultation on the proposed closure of 51 ticket offices operated by Arriva Rail London (ARL) trading as London Overground, under Schedule 17 clause 6-18 of the Ticketing and Settlement Agreement (TSA).
- 1.2 For members to agree the policy position of London TravelWatch in respect of the application by ARL.

2 Background

- 2.1 On the 20th September 2018 ARL formally wrote to London TravelWatch to commence a formal closure process for 51 of their station ticket offices. The formal submission is appended to this report in Appendix A.
- 2.2 London TravelWatch has conducted a public consultation in accordance with the process for this change. This ran from Friday 21st September 2018 to Friday 12th October 2018.
- 2.3 During this period, the following were received:
 - 3,400 responses through our online Survey Monkey questionnaire;
 - 959 emails at our consultations email address;
 - 2,063 postcard responses;
 - 31 written submissions; and
 - Petitions containing 3,253 signatures.

We received petitions from community groups and a trade union and submissions from a trade union, MPs, London Assembly Members, Local Authorities, councillors, rail user groups and a business. These are contained in Appendix C.

- 2.4 The responses from the survey are tabulated in Appendix B. The volume of comments received has been considerable and it was not feasible to produce a detailed analysis for the Board meeting of 23rd October 2018. This report now sets out the further analysis.

2.5 Of the 959 e-mails received, 378 were in the form of a template from the RMT trade union. It stated the respondent's belief that, if the changes went ahead, they:

- would not be able to access all the tickets and services needed from a ticket machine;
- would find it harder to obtain advice on tickets and fares without a staffed office;
- would be concerned that there were insufficient numbers of ticket machines (due to them being in high demand or faulty);
- would experience more delays and concourse congestion;
- and others who are disabled, elderly and vulnerable may be less confident using a ticket machine and could end up overspending or being deterred from travelling; and
- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

The 2,063 RMT postcard responses included an abbreviated version of the above points, along with space for free text comments.

The totals listed below include the free text comments from the postcards but exclude the bullet points from either the postcards or template e-mails.

2.6 The themes from the email and written submissions focussed on the current benefits of ticket offices, problems and limitations with the ticket vending machines and fears on the impact on safety, security and customer service if ticket offices were to close, especially if staffing numbers were ultimately reduced.

Respondents were overwhelmingly praiseworthy of ticket offices and their staff, who were viewed as community assets. Ticket offices were seen as an easily found, fixed focal point for customers. The ticket office was a place to purchase the correct tickets at the best price including issuing tickets that the machines could not. It was also somewhere to obtain information on service changes and disruption and give knowledgeable and reassuring advice on journey options, especially for more vulnerable customers and for the many journeys terminating outside of London.

36 respondents who expressed support for the closures did so provided that staff remained at stations and were accessible and able to assist customers. There was also an emphasis on the need for a sufficient number of working ticket machines to prevent queues of customers, particularly at the times of highest demand.

225 respondents specifically referenced concern that the changes would have a negative impact on the level of customer service offered.

2.7 Of the 51 stations involved with this submission, two stations (Stamford Hill and Theobalds Grove) do not have a functioning ticket office at present due to long term structural damage to the building that housed these. However, the data used for these stations is of an equivalent earlier period when the ticket offices were open and available.

- 2.8 The original data supplied by Arriva Rail London was for the sales of tickets regulated by the Ticketing and Settlement Agreement. This did not include those related to Oyster products such as Pay As You Go and Season Tickets which are 'unregulated' products outside of the remit of the Ticketing and Settlement Agreement. However, the DfT has now clarified that the Secretary of State's guidance should relate to all product transactions, regulated and unregulated. Previously, Arriva Rail London had followed the previous practice of London Underground's closure of regulated ticket offices on the Bakerloo and District lines of removing Oyster transactions. However, this was a managed process for each individual station, and closure of the ticket office only happened as and when passenger transactions reduced to below that of the guidance.
- 2.9 A revised set of data showing average transactions per fifteen minute period is attached in Appendix A - Additional information.

3 Passenger concerns

3.1 Staffing of stations and public security

3,824 respondents were concerned about the impact on safety and security if the ticket offices were to close, with a frequent presumption that the changes will lead to reduced station staffing levels, which will also affect safety and security.

Concerns were expressed that it will be harder to provide a safe and secure environment, especially to give reassurance to vulnerable passengers and at night. Visible staff were said to act as a deterrent to those attempting to avoid paying their fare or engaging in anti-social behaviour. 231 respondents reflected on what had happened at Underground stations following the closure of their ticket offices, where staff were not always visible, available or able to help.

24 respondents stated that, unlike at present, passengers would not necessarily know where to look for staff in order to gain assistance. This would particularly affect pregnant, elderly and disabled passengers.

3.2 Availability of tickets and information

544 respondents highlighted that the closure of ticket offices would adversely affect the ability of some passengers to purchase tickets and obtain information at the affected stations. This includes those with disabilities, those whose first language is not English and those unfamiliar with ticket issuing technology. 157 respondents stated that removing ticket offices would also reduce access for people who do not have easy internet access, such as to use the TfL app or undertake online planning and purchasing of tickets.

3,351 respondents expressed concern that the ticket machines do not offer all tickets or the cheapest ticket options. These included being unable to purchase point to point Season Tickets, add a Senior Railcard to an Oyster card, claim discounts on Gold Card transactions or top up Oyster cards. There were 22 comments that, in order to purchase such tickets, passengers would have the inconvenience and, in many cases, extra cost of having to divert their journey to the nearest station with a ticket office or have to travel to a London Terminal station.

A particular issue is that of Season Tickets for journeys commencing in London but finishing at stations outside of London. Figures from ARL show that some stations, particularly in outer London but also major interchanges in inner London such as Hackney Downs and Shepherds Bush, issue large numbers of paper season tickets, many of which will relate to journeys that involve commuting to stations outside of London. In these cases, it would be logistically difficult for passengers to purchase these tickets from a London Terminal station. For these journeys passengers would need to purchase Season Tickets from another operator at the non-London end of their journey.

There were 1,470 comments regarding various difficulties in operating ticket machines and their general reliability. This included machines not accepting cash, giving the incorrect change and rejecting banknotes and bank cards for payment for no obvious reason, along with issues raised in 3.3 below. There was much concern about the frequency with which the machines malfunctioned, and the impact if the machines were not working and passengers were unable to purchase tickets.

16 respondents explained that at certain stations such as Bush Hill Park, Hampstead Heath, Homerton, Honor Oak Park, Penge West and West Hampstead, sunlight can make it difficult to clearly see the ticket machine screens.

3.3 Impact on people with reduced mobility or a disability

Of the respondents to the online questionnaire, a significant proportion (278, 9.7%) self-identified as people with a disability. The issues raised frequently related to the utility of ticket vending machines at stations:

- they are too complicated to use, especially if you are not used to, or confident with, technology (71 respondents)
- they are slow or go wrong when being used (25)
- the touch screen is hard to operate, especially if you lack manual dexterity (19)
- the combination of finding it hard to operate a ticket machine whilst a queue forms behind you causes stress/anxiety (9)
- it can be hard to reach the touch screen if you are in a wheelchair (2)
- It can be difficult to read the screen due to the glare of sunlight whilst the screen's white print on blue backgrounds can make it illegible for people with visual disturbances/impairments (15).

4 Impact of fares and ticketing policies

- 4.1 The consultation response highlights the issue of complexity and understanding of fares and ticketing in the railway industry. The stations involved are operated by London Overground but are part of the National Rail network, and where passengers can travel directly or by interchanging on other operators' services to the places they need to get to. A large proportion of journeys from these stations are by their very nature wholly within the London Travelcard / Oyster Pay As You Go area, but a significant minority of journeys are not covered by this area and so will need paper tickets to be purchased to complete them either from a ticket vending machine or ticket office. Unless these tickets and fares are

simple and easy to understand some form of expert staff assistance will be needed to help passengers obtain the right ticket for their journey.

- 4.2 Since the commencement of the consultation, TfL has announced that from January 2019 Travelcard Season Tickets within the London Travelcard / Oyster Pay As You Go area will no longer be issued as paper tickets and instead will only be issued on Oyster cards. This affects over 4,700 passengers per year on London Overground, and will have a significant effect on activities at ticket offices.

5 London TravelWatch policy

- 5.1 London TravelWatch has an established policy for dealing with applications of this type. This involves analysing the use made of a ticket office, the availability of tickets from alternative sources such as ticket vending machines or the use of smartcards or contactless bank cards, and the impact of the change on the availability of information and visible staff members at the station. Previously, London TravelWatch has taken the view that where there are less than three transactions per fifteen minute period on average, then it would not object to the change in principle.
- 5.2 Previously, London TravelWatch has objected to applications (from other rail operators), where the numbers of transactions have exceeded the three per fifteen minute period average. The decision on the closures has then been made by the Secretary of State for Transport on whether the closures should be accepted or not. In general the Secretary of State has determined that where the numbers of transactions has been on average less than three per fifteen minute period or only marginally above for one period of fifteen minutes that the closure should be allowed to proceed.

6 Mitigation measures

- 6.1 ARL and TfL have invested significantly in recent years in new ticket vending machines at all of the stations subject to this proposal. Most of the tickets that are currently sold through the ticket office are now available on these machines. There are some exceptions, and the submission also highlights some stations where reliability is an issue, but generally the proposition is that the same tickets will be available at the ticket vending machine.
- 6.2 Most other ticketing functions that are performed at a ticket office will either remain available on ticket machines (in some cases through the use of staff functions) or will be available by other means, or that a better value option exists for a passenger using another means e.g. odd period season tickets, a better value solution would be to advise the purchase of a monthly or annual season ticket and then use Oyster / Contactless Pay As You Go for the remaining period required, with daily, weekly and monthly capping applied. In some cases e.g. National Transport Tokens, the facility has been withdrawn from use at all National Rail stations.
- 6.3 ARL are contracted to staffing of all of their stations from first to last train as part of their concession agreement with TfL. This agreement has financial penalties and incentives to ensure compliance with the contract, and is actively monitored

by TfL¹. The contractual measures include, making these staff available and visible to provide assistance, information and to help people using ticket machines.

- 6.4 The model of staffing would be the same as existing arrangements at 15 other London Overground stations (All stations between Upper Holloway and Woodgrange Park, Wandsworth Road, Clapham High Street, Emerson Park, Bethnal Green, Cambridge Heath, London Fields and Seven Sisters).
- 6.4 It is clear from the public responses that many of the ticketing options that people are concerned about, are already available at ticket machines. However, it would appear that there is a need to educate both passengers and staff as to where and how these tickets can be obtained from these machines. Where passengers are not confident in using these machines staff should be pro-actively looking to assist them.

7 London TravelWatch priority

- 7.1 London TravelWatch has a statutory obligation to consider applications for changes to ticket office hours under schedule 17 of the Ticketing and Settlement Agreement. Matters in this report therefore meet London TravelWatch's prioritisation criteria.

8 Equalities and inclusion implications

- 8.1 There are a number of equalities and inclusion implications arising from this report, relating to access to tickets and also how passengers will be required to access services such as Passenger Assist. The online Survey Monkey questionnaire included a specific question around disability and this was answered by 278 respondents. Compared to the total number of responses, this was a significant proportion.

9 Legal powers

- 9.1 Section 248 of the Greater London Authority Act 1999 places upon London TravelWatch (as the London Transport Users Committee) a duty to consider - and where it appears to the Committee to be desirable, to make recommendations with respect to - any matter affecting the functions of the Greater London Authority or Transport for London which relate to transport (other than of freight). Section 252A of the same Act (as amended by Schedule 6 of the Railways Act 2005) places a similar duty upon the Committee to keep under review matters affecting the interests of the public in relation to railway passenger and station services provided wholly or partly within the London railway area, and to make representations about them to such persons as it thinks appropriate.

10 Financial implications

- 10.1 There are no financial implications arising from this report for London TravelWatch.

¹ For clarity, the incentive regimes applicable to ARL do not apply to stations served by them operated by London Underground Ltd or other train operating companies.

11 Recommendation

- 11.1 Members are recommended to note the report and the representations that have been made by passengers and stakeholders.
- 11.2 Members are recommended to agree that London TravelWatch would not object to the proposed closures of ticket offices on principle taking account of established London TravelWatch policy and that of the Secretary of State, where it can be demonstrated that the numbers of transactions per hour, including Oyster and other non-regulated products is less than 12 per hour.
- 11.3 Members are recommended to agree that on the evidence presented by ARL and by the analysis of the public consultation exercise that London TravelWatch objects to the proposed closure of the twenty four ticket offices ², where at the times and days where the number of transactions per whole hour, including unregulated products such as those provided on Oyster, exceed the Secretary of State's guidance of more than 12 per hour.
- 11.4 Where closure is agreed then, this would be subject to the implementation of mitigation measures to inform passengers and staff of the functionality of ticket machines, and also to ensure that services such as Passenger Assist / Turn up and go for people with reduced mobility are delivered consistently.
- 11.5 Members are recommended to agree that London TravelWatch should also use the results of the consultation to influence fares and ticketing policies within the rail industry and with the DfT and TfL.

² Brondesbury, Bush Hill Park, Camden Road, Carpenders Park, Clapton, Dalston Junction, Dalston Kingsland, Hackney Central, Hackney Downs, Homerton, Honor Oak Park, Imperial Wharf, Kensal Rise, Kensington Olympia, Shepherds Bush, Shoreditch High Street, Silver Street, St James Street, Surrey Quays, Turkey Street, Watford High Street, West Hampstead, White Hart Lane and Wood Street.