

Andy Byford
Transport Commissioner
Transport for London
11th Floor,
197 Blackfriars Rd,
London SE1 8NJ

8 December 2020

Dear Andy,

Proposed ‘temporary’ withdrawal of ability to pay by cash at London Underground, London Overground and Docklands Light Railway (DLR) Ticket Vending Machines (TVMs) and London Overground ticket offices

I’m writing to you about the proposal to make all ticket machines cashless, that has come to us via TfL’s Stakeholder Engagement team. London TravelWatch are not being formally consulted on the proposal but instead have been asked for our comments.

London TravelWatch is concerned that this proposal will have a significant impact on passengers, and especially those on low incomes. We recognise that there are operational savings to be made from this proposal, but we note that this idea is being put forward as a means of controlling conditions for the spread of the Coronavirus, rather than as a cost saving exercise.

We have researched this topic through a public survey of our online community, interviews with affected people and businesses and by looking at data on TfL’s website. The attached PowerPoint presentation sets out our research in detail.

Our concerns with these proposals are as follows:

- That the risk of spread of Coronavirus by the use of notes and coins may be overstated and that this is supported by research by the Bank of England.¹
- There would still be a need for safe queuing and regular cleaning of ticket machines if only card transactions were accepted.
- TfL has stated that prior to March 2020, London Underground TVMs handled 75,000 cash transactions per day. In percentage terms this may be a small number over the entire network, but this is still a very large number. Some of the people making these transactions will be able to make other arrangements to pay, but some won’t.
- There are 1.2 million adults in the United Kingdom and around 260,000 living in the Greater London area (over 20% of the UK total) who do not have access to a bank account or other means of paying for travel by some form of card or mobile phone payment². This affects people on low incomes, children and those for whom access to banking is restricted such as those declared bankrupt or with a poor credit history. These people are more likely, if they are in paid employment, to be unable to work remotely and therefore have a greater need to travel. This is borne out by responses to our survey. In addition, we have spoken to the Access to Cash review team and that they tell us that in

¹ <https://www.bankofengland.co.uk/quarterly-bulletin/2020/2020-q4/cash-in-the-time-of-covid>

² <https://www.fca.org.uk/publication/research/financial-lives-consumers-across-uk.pdf>

the United Kingdom there are approximately eight million adults reliant on cash even though many of these will have bank accounts and cards.

- For children who use the Underground, DLR and London Overground the proposals are problematic because they or their parent/guardians may not have access to bank accounts, cards and mobile phone payment systems. The ability to use cash allows them to complete their journeys safely and quickly. We note that after the initial trial removal of cash from London Underground at some stations, those on the Metropolitan line between Rickmansworth and Amersham/Chesham had the facility reinstated for the beginning of the autumn school term in order to allow children to get to and from schools and colleges.
- As part of our survey, members of the European Passengers Federation, responded by stating that many overseas bank and credit cards are not compatible with the UK banking system and that visitors need to use cash. This will be a greater problem once tourism is resumed. We also note that in other world cities and European capitals, cash is still an accepted means of purchasing tickets for metro services.
- The proposed alternative of using an Oyster agent Ticket Stop will be viable for some passengers. However, not all stations have such an agent nearby (for example all of the Metropolitan line stations between Rickmansworth and Amersham/Chesham, and a significant proportion of the DLR – see Appendix 1), and the geographic distribution of these can be variable in terms of distance and accessibility. The proposed change would leave significant gaps in outer and central London, and in inner East London without easy access to a cash alternative.
- Ticket Stop agents are independent businesses with opening hours that will vary, and may not necessarily be compatible with some journeys that passengers need to make, especially for shift workers reliant on cash, such as early mornings, late evenings and weekends.
- We spoke to as many Ticket Stop agents as we could as part of our research and found that many were struggling in their business and were not optimistic about their future. They regarded Oyster as part of their community service, but said it did not contribute to the overall profitability and viability of their business. There is therefore a question mark over the long-term sustainability of these businesses being able to act on TfL's behalf.

For all of the above reasons we conclude that this proposal has not been properly thought through by TfL and needs to go back to the drawing board.

Yours sincerely



Emma Gibson

Director, London TravelWatch

Cc Sadiq Khan, Mayor of London

Heidi Alexander, Deputy Mayor (Transport)

Appendix 1 – London Underground, London Overground and DLR stations with no Oyster Ticket Stop agent nearby or where topography is problematic

- On London Underground 17 had a Ticket Stop over 400m away or had no access to a Ticket Stop – Chalfont and Latimer, Chesham, Chorleywood, Croxley, Epping, Fairlop, Holland Park, Hyde Park Corner, Knightsbridge, Loughton, Moorgate, North Greenwich, Osterley, Rickmansworth, Stanmore, Watford, White City.
- On London Overground 5 had a Ticket Stop 400m or more away – Hackney Wick , Southbury, Imperial Wharf, South Acton and Watford High Street stations
- On the DLR 10 had no Ticket Stop available – Bank, Beckton Park, Devons Road, Langdon Park, Limehouse, Mudchute, Pontoon Dock, Pudding Mill Lane, Royal Victoria and West Silvertown stations