
Secretariat memorandum

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PC089
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Confidential: RSLU ticket office closures

1 Purpose of report

- 1.1 To update members about discussions with London Underground Limited (LUL) regarding proposed ticket office closures at Regulated Stations London Underground (RSLU) stations and to present proposed measures to mitigate disbenefits to passengers.

2 Recommendation

- 2.1 Members consider the mitigation measures proposed by LUL.

3 Background

- 3.1 With the Fit for the Future Stations (FftFS) programme, LUL began closing London Underground operated ticket offices in early 2015 with the aim to bring staff out from behind the ticket office window in order for them to be more visible and available to passengers, as well as to reduce operating costs. The programme aims to upgrade ticket vending machines (TVM) and equip staff with hand-held devices to help provide information to passengers. As a result, 265 ticket offices have been closed across the London Underground network and 227 stations currently operate without a ticket office.
- 3.2 London TravelWatch held a consultation on the FftFS proposal from 15 August to 28 September 2014 and received over 2,000 responses. After reviewing the responses and available data, the key concerns that we highlighted to TfL were:
- The proposals are being rushed through without the opportunity to consider passenger input, including our previous recommendations;
 - The process must be flexible enough to both include any of our recommendations and to react to changing demand in the future, if necessary, even after the works have been completed for the stations currently being converted;
 - That London TravelWatch is consulted before any part of the ticket hall is converted from passenger use;
 - A number of specific station categorisation changes, including the upgrading of some major stations to 'Gateway' status;

- That our offer to work with Transport for London (TfL) on the design of the ticket machines is taken up; and
 - That some LU stations are already refusing to sell tickets to National Rail stations
- 3.3 With our encouragement, LUL has been rigorously monitoring the FftFS programme and we have seen from these results no evidence to suggest that the changes have caused a disbenefit to passengers.
- 3.4 As part of the FftFS programme, LUL have, more recently, proposed to close the ticket offices at 11 'Regulated Stations'. LUL took over the operation of these 11 stations from Silverlink in 2007, yet these stations remain regulated under the Ticketing and Settlement Agreement (TSA) in order to be able to sell National Rail tickets.
- 3.5 The 11 stations, referred to as Regulated Stations London Underground (RSLU) stations, include:
- Gunnersbury
 - Harlesden
 - Harrow & Wealdstone
 - Kensal Green
 - Kenton
 - Kew Gardens
 - North Wembley
 - Queen's Park
 - South Kenton
 - Stonebridge Park
 - Wembley Central
- 3.6 As the statutory body representing transport users in London, London TravelWatch's role in respect of these statutory consultations is to consult with passengers as we feel is necessary for the extent of the changes proposed.
- 3.7 London TravelWatch held a consultation on the proposed ticket office closures for the 11 RSLU stations from 6 January to 27 January 2016. The consultation was promoted on posters at the affected stations, a press release and tweets from London TravelWatch, as well as information on our website. The over 1600 responses to the consultation were overwhelmingly opposed to the proposed ticket office closures. The main concerns raised within the consultation responses are about:
- the lack of staff for assistance and purchasing tickets;
 - crime and reduced sense of safety resulting from losing ticket office staff;
 - the unreliability and insufficient number of TVMs;
 - overcrowding due to queues at TVMs;
 - the value of human interaction;
 - the particular needs of visitors and tourists.

It should be noted that there seemed to be a lack of clarity from many consultation respondents on the precise implications of the proposal; for example, many respondents understood that the stations would be unstaffed. Better information is needed to make sure that passengers fully understand what is being proposed, especially when the proposal involves significant changes to the services passengers have come to expect.

Please refer to Appendix A and B for the main issues raised within consultation responses.

3.8 Having considered the issues and taken into account the impact on passengers, London TravelWatch met with LUL on 28 January to discuss our concerns and to explore potential mitigations to reduce passenger detriment resulting from the proposal. We were particularly concerned about 3 of the 11 RSLU stations where ticket office transactions are high and where a substantial number of National Rail tickets are sold. Harrow & Wealdstone, Queen's Park and Wembley Central, hereby referred to as the 'Metro' stations, have significantly higher number of ticket office transactions and National Rail tickets sold when compared to the remaining 8 stations, hereby referred to as the 'Local' stations. Of the 8 Local stations, Gunnersbury and Kew Gardens were of some concern due to the high proportion of visitors / tourists using the stations.

3.9 At that meeting, London TravelWatch proposed the following mitigations to reduce passenger detriment:

- Retaining ticket offices open at the busiest times using new part-time staff
- Giving staff hand-held ticket machines that can issue the range of National Rail tickets
- Providing pre-printed travelcards to nearby hotels at Wembley Central
- Opening the ticket office on event days at Wembley Central between May 2016 and December 2016 (i.e. the 'interim period' between the proposed closure of the ticket office and the proposed installation of the upgraded TVMs)

3.10 On 3 February, London TravelWatch submitted their response to the consultation, formally objecting to the proposal. Our response was copied to the Department for Transport (DfT). The main reasons for objection included (1) the high number of respondents to the consultation who raised valid concerns, (2) the periods in which ticket office transaction exceed the 12-per-hour threshold, and (3) the limited availability of certain types of ticket products.

Please refer to Appendix C for a copy of London TravelWatch's letter of objection.

3.11 Following our objection to the proposal, the DfT rejected LUL's proposal.

3.12 London TravelWatch held a follow-up meeting with LUL on 12 February to discuss further mitigation measures that might make the proposal acceptable. These mitigation measures are presented in a formal response from LUL and are summarised below. The LUL response letter will be sent to members separately to this report once it is submitted.

4 Mitigation measures proposed by LUL

- 4.1 LUL has made attempts to mitigate any disbenefits to passengers resulting from the proposed ticket office closures. They have addressed concerns about the 'interim period' – the period between the proposed closure of the ticket offices in April 2016 and the proposed installation of the upgraded TVMs in December 2016 - by committing to keeping the ticket offices open from 7am-7pm until the upgraded TVMs are installed at the 8 Local stations and to retain the ticket offices from 7am-7pm at the 3 metro stations on the assumption of a permanent basis.
- 4.2 However, the 3 Metro stations will undergo a 2-month monitoring period after the installation of the new TVMs to see whether there has been a reduction in ticket office transactions below the 12-per-hour threshold at any time of day. The monitoring period may be extended by 1 month (for a total of 3 months) if the data does not show an acceptable reduction in ticket office transaction. If LUL are able to demonstrate a reduction in ticket office transaction below 12-per-hour, we would recommend that the Board accepts the closure of the ticket office without the need to go through a new consultation.
- 4.3 Both London TravelWatch and LUL agree on the importance of clear, thorough and accessible communications in a variety of formats to properly inform passengers about how the proposal will affect their journey, avoiding any confusion and inconvenience to passengers. This is especially important since many people have been confused about what is being proposed and the implications of the proposed changes. As mentioned above, this confusion has been reflected in many responses to the consultation. LUL will be adapting the communications strategy they used previously for the FftFS programme to reflect the special case of the RSLU stations.
- 4.4 In order to support passengers during the proposed transition phase, LUL have proposed to provide:
- Advance notice station signage at each Tube station;
 - Travel advice posters with a map of local area and walking routes highlighted between ticket stops and/or alternative Tube stations;
 - Online information on the TfL website including social media, to advise and inform passengers;
 - Targeted emails to affected passengers in advance and during changes;
 - Staff leafleting at stations to provide tailored information on Ways to Pay.
- 4.5 Information on the proposed ticket office closures also provides an opportunity to clarify existing fare structures and services that passengers may not be fully aware of or understand, such as daily and weekly fare capping on Oyster and contactless cards. LUL have agreed to look into how they can improve their communications to passengers about how the proposed changes will affect their travel experience and the options available to them.

5 Discussion

- 5.1 The Secretary of State has determined that, where there are fewer than 12 transactions per hour or 3 per fifteen minutes, it is not appropriate to consider closing a ticket office. London TravelWatch has a policy of not opposing proposals where the average numbers of transactions are less than this 12-per-hour (or 3-per-fifteen minutes) threshold, unless there are any other reasons for concern.
- 5.2 The 12 transactions per hour threshold was a very hard won standard by us with the DfT in the face of considerable pressure from train operators. It remains an important determinant of current policy and has served a variety of useful purposes in forcing train operators to think about closing ticket offices and what measures would need to be put in place to mitigate disbenefits to passengers. London TravelWatch should work to uphold this standard.
- 5.3 LUL is confident that the proposal for the RSLU stations will ultimately benefit passengers, just as they claim that the FftFS programme has improved the passenger experience across the network. LUL believe that the proposal will (further) reduce the need for transactions at the ticket office and, should the number of ticket office transaction fall below the 12-per-hour threshold after the introduction of the upgraded TVMs, we recommend that the Board not object to closing the ticket offices, as long as there are no other reasons for concern. Therefore, the 2-month monitoring period (with the possibility to extend by 1 month) after the upgraded TVMs are installed at the 3 Metro stations provides an opportunity for LUL to prove their proposed system is better for passengers while reducing the need for ticket offices.
- 5.4 London TravelWatch should consider whether or how it will oversee the monitoring period, for example via mystery shopping or through input from external sources such as LUL station staff.
- 5.5 Should LUL demonstrate that ticket office transaction are below the threshold after the monitoring period at the 3 Metro stations, they would prefer to avoid the need for a further consultation on closing the ticket offices there. We recommend that the Board accepts that the need for a new consultation be avoided under these circumstances.
- 5.6 LUL and London TravelWatch agree on the importance of effective communication to staff and passengers about the proposed changes. Although a complex and large amount of information, it will need to be presented clearly and thoroughly. It is important to consider the overwhelming opposition to the proposal within the consultation responses, as well as the significant amount of confusion about what was being proposed in the consultation responses. LUL must provide passengers with clear information on what tickets and services will and will not be available to them at the RSLU stations.

Please refer to Appendix D for a list showing the availability of tickets now and throughout the proposed changes.

6 London TravelWatch priority

- 6.1 This issue falls within the core remit of London TravelWatch and the impact of the proposed changes will be substantial amongst the high number of current and future passengers using these stations.

7 Equalities and inclusion implications

- 7.1. Ticket office closures may have implications for passengers with disabilities.

8 Legal powers

- 8.1 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.

9 Financial implications

- 9.1 London TravelWatch had to take on additional resources in order to process the responses to the consultation.

Appendix A – Main issues raised within consultation responses, by station

From a sample of the consultation responses, some of the main issues / themes raised are presented for each station below.

Gunnersbury

- Overcrowding:
 - Need for improved ticket hall layout due to overcrowding at peak times
 - Access issues to/from platforms (narrow staircase)
 - Safety concerns due to overcrowding
 - Chiswick Park business park brings many people to the station, so will the new Brentford football stadium
 - Office, retail and residential developments will lead to greater station usage
 - Poor placement of TVMs leading to bottlenecks
- Tourists/visitors
 - Chiswick business park and large hotel brings many visitors to the station, some not fluent in English
- Safety
 - For people who work late, especially women
- Losing excellent staff / service

Harlesden

- Machine malfunctions
- Overcrowding: due to new residential developments (e.g. Old Oak Common)
- Safety: high crime area, (e.g. stabbing on platform)
- Fare evasion

Harrow & Wealdstone

- Overcrowding: already a busy station with queues
- Facilities : Toilet needs upgrade and frequent cleaning
- Machine malfunctions
- Ticket gates reject certain ticket types (e.g. first class or railcard tickets issued for other operator services)

Kensal Green

- Safety: murder in 2006, high crime area, ASB, especially for women
- Tourists / visitors: from adjacent hostel
- Losing excellent staff and service
- Machine malfunctions

Kenton

- Overcrowding:
 - bottlenecks at narrow access to station and to platforms
 - increased usage in past 4-5 years
- Safety
- Machine malfunctions

Kew Gardens

- Tourists / visitors:
 - some not fluent in English or unfamiliar with ticket types
 - many passengers during events
- Machine malfunctions
- Safety
 - especially for women
 - many using the subway as a public route across the tracks

Queen's Park

- Overcrowding: due to narrow ticket hall
- Tickets
 - limited tickets and services
 - ability to purchase at a less busy station

Stonebridge Park

- Fare evasion
- Safety: dangerous area, ASB
- Machine malfunctions

Wembley Central

- Tourists / visitors: events, some not fluent in English
- Overcrowding and queues
- Machine malfunctions / insufficient amount of machines
- Discriminatory towards non-tech savvy passengers

Appendix B – Issues raised within consultation responses

We received some bulk responses via the National Union of Rail Maritime and Transport Workers (RMT) that were signed and sent in by individuals. The bulk response reads:

'Dear London TravelWatch,

I oppose the planned closure of station ticket offices at Gunnersbury, Harlesden, Harrow & Wealdstone, Kensal Green, Kenton, Kew Gardens, North Wembley, Queen's Park, Stonebridge Park, South Kenton and Wembley Central as I am concerned that:

- I would not be able to access the full range of tickets and services I need from a ticket machine;
- I would find it harder to obtain advice on ticket and fare options without a staffed ticket office;
- I am concerned that if there were insufficient numbers of ticket machines (due to them being in high demand or faulty) I would experience delays and the concourse would be more congested;
- I am concerned that vulnerable or less technically minded passengers, perhaps including the elderly, disabled or visitors, may be less confident using a ticket machine and could end up overspending or being deterred from travel; and
- I am concerned that leaving stations understaffed and sometimes unstaffed will make it harder to provide a safe network with CCTV left unmonitored.'

Some examples provided by the RMT of tickets and services not available at TVMs:

- Purchasing Oyster cards
- Purchasing National Rail season tickets
- Purchasing Railcards
- Paying for tickets with a mixture of both cash and card payments
- Obtaining Oyster journey history statements
- Paying with cheques and warrants
- Purchasing or replacing paper travelcards (damaged or lost)
- Oyster refunds with PAYG balance above £10, with a valid season ticket or purchased less than 48 hours ago
- Refunding last PAYG top up or whole PAYG balance or using PAYG balance to offset the price of a season ticket (e.g. the customer who mistakenly topped up when intending to purchase a season ticket)
- Changing season tickets (e.g. to increase / reduce the number of zones)
- Mainline discounts on single tickets (i.e. LU machines only sell mainline railcard discounted travelcards)
- Upgrading a LU paper single / return to an LU paper Travelcard
- Purchasing Advance, Super Off peak, Open singles / returns

Appendix C – London TravelWatch letter of objection to the proposal, 3 February 2016

Mark Evers
Director of Customer Strategy
London Underground Ltd
Floor 5 Palestra
197 Blackfriars Road
London SE1 8NJ
2016

3rd February

Dear Mark,

Ticketing and Settlement Agreement: proposed closure of ticket offices under Schedule 17. Major change at eleven stations.

Thank you for your letter of the 6th January 2016, including attachments. The stations covered by these proposals are Harrow & Wealdstone, Kenton, South Kenton, North Wembley, Wembley Central, Stonebridge Park, Harlesden, Kensal Green, Queen's Park, Kew Gardens and Gunnersbury.

We have considered your proposals, alongside over 1600 objections from members of the public and stakeholders who responded to our consultation on this issue. We have concluded that the proposals (including the mitigations put forward to reduce passenger detriment) are not acceptable. Therefore, we formally object to them, and so we are referring the matter to the Department for Transport (DfT) for them to make a decision on this matter.

Passenger feedback on the proposals overall

The response to the consultation was one of overwhelming opposition to the proposals, with only five individual expressions of support. This mirrors the results from the consultation survey we did in 2014 on your previous proposals in relation to the stations on your network that are not subject to the provisions of the Ticketing and Settlement Agreement. Proportionately however, the response to these eleven stations is much greater than that for your network in general. This reflects the different character, passenger usage and profile of these stations compared to others on the network.

Numbers of transactions per hour:

The Secretary of State has previously determined that where there are fewer than 12 transactions per hour or 3 per 15-minute period that it is not appropriate to consider closing a ticket office regulated under the Ticketing and Settlement Agreement. London TravelWatch has a policy of not opposing proposals where the average numbers of transactions per hour is fewer than 12 (or 3 per 15-minute period).

However, this threshold is exceeded at all of the stations at certain times on Mondays to Fridays as shown in the table below:-

Table 1.

Gunnersbury; 0800-0900 and 1700-1845	North Wembley; 0700-0915
Harlesden; 0730-0945	Queen's Park; 0645-1400
Harrow & Wealdstone; 0615-1915	South Kenton; 0715-0815
Kensal Green; 0800-1000	Stonebridge Park; 0745-0845
Kenton; 0700-0945 and 1545-1630	Wembley Central; 0630-1945
Kew Gardens; 0715-1015	

Even after deducting Oyster transactions the numbers of sales of paper one day Travelcards and National Rail tickets being sold at a number of these stations still exceeds the guidelines at these locations and times on Mondays to Fridays:-

Table 2.

Harrow & Wealdstone 0630 to 1100
Queen's Park 0645 to 0945
Wembley Central 0700 to 1100

Proposed mitigations for passengers purchasing National Rail tickets

In terms of passenger detriment, our biggest concern is for passengers purchasing National Rail tickets from these stations both in the immediate period after a ticket office has closed but before new ticket vending machines are installed and after these have become operational.

In the interim, passengers will be reliant on the existing ticket vending machines that would need to cater for a significant additional volume of transactions. These existing machines are sometimes unreliable and increased use may lead exacerbate this.

Even following the installation of the new ticket vending machines, passenger detriment will still exist. We note that following the closure of your ticket offices at stations where there is also a National Rail ticket office, that rail operators have reported to us a significant and sustained rise in the use of their ticket offices. This suggests to us that passengers value a central, visible, permanent, and accessible point in stations to buy tickets and get authoritative information from staff, particularly for journeys that they make infrequently or are new to them. However, in the case of these stations there are no obvious alternative locations where passengers could realistically go to receive the same service that they do now.

Similarly, National Rail operators have reported to us a rise in ticketless travel from stations managed by London Underground on their services. This is concerning to us as it would indicate that passengers are not finding it easy to obtain the correct ticket for their journey.

To mitigate the passenger detriment of your proposals the alternatives are either a) retain the ticket offices at the busiest times (see table 2 above) or b) to give station staff based in the ticket hall a mobile ticket-issuing machine. This mobile device needs to be capable of issuing the full range of National Rail tickets. To be acceptable to us these

options would need to be permanent solutions and subject to the full TSA process if you subsequently wanted to change the arrangement. There would also need to be an arrangement to accept cash in payment for tickets.

Wembley Central station is characterised by the sale of a large number of paper one day Travelcards to visitors staying at hotels in the area. This includes the group product that is not available at ticket vending machines. You have suggested that you will offer these hotels pre-printed one day Travelcards that they can sell on to passengers, as you do elsewhere. This is welcome but you would need to set up this arrangement prior to the closure of the ticket office. You have also suggested that in the interim period you would reopen the ticket office for events at Wembley venues.

Access to Oyster products.

You have suggested that the proximity of TfL agents to the stations concerned means that passengers will have alternative means of purchasing Oyster products such as Pay As You Go credit, bus passes and Travelcards. This however, depends on these agencies being open at similar times to the previous ticket office hours and passengers knowing where these are in relation to the station. Staff at these agencies also need to be fully aware of the ticketing options open to passengers.

Other matters

The responses to the consultation also included a significant number of other concerns not related to ticket selling, and I will write separately outlining these.

If you have queries on this letter, please do not hesitate to contact me.

Yours sincerely

Tim Bellenger

Director – Policy and Investigation

cc. Simon Feast, Fares and Passenger Benefits Team, Department for Transport.

Appendix D – LUL list showing the proposed availability of tickets now and throughout the proposed changes to RSLU stations, 12 February 2016

The customer ticketing proposition is now covered as follows:

Functionality	Today	3 Metro Stations	8 Local Stations	On TfL TVM
Buy Oyster Card	Yes	During TO Hours	During TO Hours	Yes
Top up Oyster Card	Yes	Yes	Yes	Yes
Process Failed Oyster Card	No	No	No	Yes
Resolve Incomplete Journeys on Oyster Card	Yes	During TO Hours	During TO Hours	Yes
LU Annual Travelcard	Yes	During TO Hours	During TO Hours	No
LU Monthly and Weekly Travelcard	Yes	Yes	Yes	Yes
LU Singles, Returns & Day Travelcards	Yes	Yes	Yes	Yes
LU Group Travelcards	Yes	During TO Hours	During TO Hours	Yes
LU Oyster Refund	No	No	No	Yes
NR Annual Season	Yes	During TO Hours	During TO Hours	No
NR Monthly and Weekly Seasons	Yes	During TO Hours	During TO Hours	Yes
NR Singles and Returns	Yes	Yes	Yes	Yes
NR Refunds - if sold at TO within same SAMF shift	Yes	During TO Hours	During TO Hours	No
NR Refunds	No	No	No	No

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This document reflects ongoing work and discussions within LU on options for the future of London Underground. It does not represent LU's final position on the contents, which are subject to ongoing consultation with our trades unions.