

27 September 2021

Mr A Riley
Head of Stations
LNER
East Coast House
25 Skeldergate
York
YO1 6DH
(sent via e-mail)

Dear Mr Riley

Proposal to amend LNER London King's Cross Travel Centre opening times

I am writing on behalf of London TravelWatch in response to the above proposal from LNER.

1. Summary of consultation responses

We have received 24 responses, comprising the following:

- Correspondence from individuals in a templated e-mail - 21
- Other correspondents – 3 (a joint response from trade unions and other interested organisations; a trade union; and a rail user organisation).

All but one respondent is fully opposed to the proposals. Issues raised are detailed below.

2. Ensuring widespread and easy access to the purchase of rail products

Respondents to the consultation expressed concern that cuts to ticket office opening hours would make it harder for passengers to get the cheapest and most appropriate fare for their journey and restrict the advice they can currently access.

They stated that it would be particularly detrimental for older passengers, disabled passengers, women and girls or people on lower incomes who may not have access to digital ticketing and/or have difficulty using Ticket Vending Machines (TVMs).

One respondent emphasised that it was important that those passengers without easy access to online or mobile ticketing alternatives are not deterred or even excluded from travelling. LNER have advised that, of the 31 TVMs at King's Cross which will remain available for use when the ticket office is closed, six accept cash.

LNER have explained that their TVMs are not fitted with a 'help' button allowing a video call to a call centre operator, but that staff on the station will be able to assist.

LNER also acknowledged that some ticketing products will not be available via a TVM including railcards, annual season tickets, sleepers and refunds. This should be the subject of an LNER mitigation measure to advise customers about how to buy these tickets and access refunds.

Respondents commented that ticket offices provide a wide range of services and advice in addition to ticket sales, with passengers unable to access this level of advice from a TVM. A comprehensive breakdown was requested of the range of advice and services that would not be available for passengers when the ticket office was closed.

Concern was expressed that LNER had not published an Equality Impact Assessment for the proposals. It is unclear if LNER have completed this Assessment. It was also asked whether LNER's proposals would require its Accessible Travel Policy to be amended.

One respondent argued that consideration should be given to opening King's Cross ticket office slightly earlier than the proposed 06.00 on weekdays given that the first long-distance train of the day departs at 05.55.

3. Safety, security and accessibility

Concern was raised that the proposed cuts in opening hours would worsen passenger safety, security and accessibility by reducing the time that staff are guaranteed to be present at the ticket office.

There was also concern that once ticket office opening hours are no longer regulated by Schedule 17 requirements it would make it far easier to reduce station staffing.

LNER have committed to have their staff on all their stations from start until last train to offer customer assistance, accessibility support and visibility, still having the same number of staff to provide assistance.

4. Ticket sales volume

LNER have provided ticket sales data which we note covers the period prior to the pandemic and the associated times of travel restrictions.

The Secretary of State's definition of a "busy" ticket office is one in which there are an average of 12 ticket sales per hour. We have reviewed the sales data for the periods in which you propose to close the ticket office i.e.:

05.15 - 06.00 on Monday to Saturday;
06.00 - 07.00 on Sunday;
22.00 - 01.40 on Monday to Friday and Sunday; and
22.00 - 00.40 on Saturday.

There are no instances where ticket sales are at, or above, the 12 ticket sales per hour, and so meet the Department for Transport guidelines for closure. As there are no instances where ticket sales are at, or above, the 12 ticket sales per hour, **we do not object** to the proposed closure of LNER's King's Cross ticket office.

However, although we do not object to the closure, this would be subject to the previously mentioned mitigation measure to advise customers about how to buy tickets not available via a TVM and access refunds.

Please contact me if you wish to discuss any of the above.

We will be sharing this submission with our colleagues at Transport Focus.

Yours sincerely

T. Rosenberg

Trevor Rosenberg
Policy and Advocacy Officer

