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London Travel Watch

27 September 2023

(Sent via e-mail)

Dear [REDACTED]

Avanti West Coast (AWC) Proposal under the Major Change Process of the Ticketing and Settlement Agreement (TSA)

Thank you for your letter of 6 September detailing your queries to the proposed changes relating to London Euston, as outlined within our major change proposal under the Ticketing & Settlement Agreement (TSA). We are grateful for the time you have dedicated to processing, analysing, and summarising the large volume of responses you have received since the public consultation commenced on 5 July 2023.

I would also like to take the opportunity to acknowledge that we are grateful for the opportunities that have allowed us to meet both via Teams and face to face at London Euston to discuss the proposals with you in more detail throughout the consultation period and to address any areas of clarification.

We welcomed the opportunity on 12 September 2023 to present the current passenger journey through London Euston station and the proposed changes related to wider improvement initiatives as well as those covered in the TSA major change consultation. This letter focuses on the latter proposals which are in scope under the TSA major change consultation and the subject for your consideration.

Our proposal

AWC proposes changes to the way that tickets are retailed at London Euston. The key aspects of this proposal are:

- Movement of specialist ticketing support colleagues from behind the counter to the TVM area at London Euston. In order to support the customer transition to the new way of working, the change will be delivered in stages. These stages will include a very short-term period where one counter will remain open and also a stage where additional staff will be able to support and advise on transfer to digital, to supplement online and marketing activity.
- Redeployment of AWC ticket specialists from behind the counter to the TVM area directly alongside the concourse, where they will be more visible to customers using London Euston Station. Efficient sizing of the Euston team, to ensure that customers have access to specialist ticket sales knowledge at the times and levels that align to recent ticket sales transaction volumes at the station. This responds to the shift over the last 10 years from station to digital sales and the proposed earlier finish time of 2200 instead of 0000.
- Responding to customer behaviour which has already moved significantly to online sales (both on the AWC web and app and through third party retailers) and encouraging further channel shift through marketing activity. For those unwilling or unable to use digital channels, retaining 8 TVMs at the station as well as the ability to retail all ticket types through AWC Customer Ambassadors using handheld ticket issuing devices.

These changes meet the TSA requirement, in that they continue to deliver widespread and easy access to the purchase of rail products, and transactions that aren't purchases, whilst increasing the cost effectiveness of the operation at London Euston.

Our proposals:

- continue to allow customer to **easily buy the right ticket**, either through web, app, contact centre or at the station using TVMs with or without the support of the highly trained AWC team
- improve the quality of service at London Euston because they result in more staff being visible from the concourse area, on hand to give face-to-face help with a wide range of needs including to **give good information about journeys**
- do not impact on passenger assistance (booked or turn up and go) which continues to be provided by Network Rail but set out how AWC will provide **excellent support to those with accessibility needs**.

As a result of our proposed mitigations, analysis of ticket purchasing at London Euston and the new role our colleagues will undertake, AWC does not anticipate issues such as lengthy queues that could risk reducing customer service quality. However, we will continue to monitor ticket sales and customer satisfaction. Should we see an issue such as lengthy queues developing at London Euston, we will proactively introduce measures to improve the retail arrangements.

Specific clarification questions

Our responses are set out in the order in which they were raised in the appendix to your letter of 6 September and are designed to address your areas of concern.

Expected impacts of the proposals

- 1. What quantitative assessment has been made of the overall costs and benefits of the proposals (for example, in terms of the impact on staff costs and fares revenue), and over what period?***

Due to the confidential nature of commercially sensitive information, it is not possible to share the actual quantitative cost and benefits of the proposal that AWC have undertaken to protect the interests of rail users and to promote efficiency and economy for taxpayers.

A full cost benefit analysis has been undertaken to ensure that value for money is delivered for both the passenger and tax payer. Any cost savings made through the redeployment of staff and closure of ticket offices will ensure better value for money for the tax payer and passengers.

The cost benefit includes the benefit derived from the opportunity to build optimised rosters that deliver a much more efficient operational resource plan, using this profiling to align hours to the peak times where the level of customer demand is greatest. The staff modelling based on these assumptions result in a more efficient resourcing model with overall staff costs, net of one-off costs, anticipated to have a short pay-back duration..

The overall impact to fares revenue is expected to be negligible as a result of customers still being able to enjoy the full range of products and services, including face to face interaction with staff. The functionality on web, app and TVM, combined with the current ticket office equipment capable of being used as a hand-held mobile device, allows the full range of

tickets to be sold as well as in-person interaction with staff where required. There is also no impact on the revenue protection team or processes at London Euston from this proposal.

2. What are the intended specific measures of customer service quality and what is the current picture provided by the data generated through those measures?

AWC will monitor the impact on customer service quality through multiple analysis and monitoring techniques as used today. This will allow the existing measures to be used as baseline data against any future changes. The latest information on level of performance for key measures of customer service for London Euston (from Periods 1 to 6 of this financial year) is as follows:

- Customer Satisfaction with Friendliness and attitude of staff at London Euston station 7.9/10
- Customer Satisfaction with our ability to resolve any issues or problems you may have at London Euston station 6.1/10
- Customer Satisfaction with Information given about your journey at London Euston station 7.4/10

AWC does expect this level of performance to be impacted by the proposed changes to ticket retailing at stations but as one of many factors.

3. What monitoring regimes will be used to measure the time taken and quality of assistance provided to those passengers with accessibility needs? What is the current picture provided by the data generated through any existing monitoring?

There are multiple channels of feedback from customers which provide AWC with a comprehensive view of the quality of assistance provided. The customer sentiment at London Euston is measured as set out in the previous response. In addition, Savanta (a 3rd party provider) provide surveys to customers that have booked assistance which ask questions about each touchpoint throughout the process from booking which looks to identify the quality of the experience, including timeliness, service at the origin station, destination/interchange station and on board. There is also feedback from customers through the customer facing Passenger Assistance app where customers can give a 1-5 star rating. Complaint data is also regularly analysed. This data helps to shape improvement plans for stations.

Overall level of staffing

- 4. Please clarify how daily FTE totals and shift patterns compare for the current and proposed deployment of AWC staff at the station in customer-service roles. Please explain what stress-testing has been done to establish the resilience of the staffing proposals to manage sickness and leave, vacancy levels and the impacts of train service disruption at Euston.***

This size of the Euston team has been efficiently designed to ensure that customers have access to specialist ticket sales knowledge, at the times and levels that align to recent ticket sales transaction volumes at the station. This responds to the shift over the last 10 years from station to digital sales, and the proposed earlier finish time of 2200 instead of 0000.

A minimum of 10 daily FTE will be rostered to work in the TVM area at the station following this proposal, providing specialist ticketing support to customers from 0600 to 2200.

The proposed rosters for London Euston have spare coverage built in which is over and above the minimum percentage required to cover annual leave. This, combined with a range of internal policies and procedures to manage sickness and support employee health and wellbeing support the ultimate aim to ensure a workforce that is fit and able to deliver their rostered shifts.

In addition, we already minimise the risk caused by vacancies through current predictive recruitment process - a process whereby recruitment events are held and successful applicants are placed in talent banks in advance of a vacancy arising. This process will continue in the future proposal and will enable vacancies to be filled in a timely way.

AWC will continue to monitor customer insight data to determine the effectiveness of the customer proposition and hours of coverage. Rosters may change for operational reasons (for example, timetable changes), or to ensure customer needs and demands are reflected in the hours and volume of staff coverage.

When disruption occurs today, the station leadership team re-allocate resources as required, for example, Revenue Protection teams move out onto the concourse to provide more visibility and support for customers. This will continue to happen within the future proposal.

- 5. How would any new staffing arrangements be advertised to passengers in place of the present arrangements to advertise ticket office opening times? How will compliance with any new hours be monitored and reported?***

Staffing hours for London Euston Ticket Office are currently advertised on our website (which has Shaw Trust accreditation) and on wider industry websites, as well as at the station.

AWC propose that we continue to display information at the station, online on the AWC website and that the information is made available to third parties such as Network Rail and National Rail Enquires to enable the hours when ticketing specialist staff will be at the stations to be displayed (in much the same way current ticket office hours are displayed today).

In respect of compliance, one option would be to use the existing Assisted Travel Policy, which is regulated and enforced by the ORR and requires stakeholder involvement to make changes to provisions at stations.

6. *What arrangements will be put in place to ensure that a fixed, advertised staff presence will not subsequently be reduced or removed without further passenger consultation?*

One option would be to use the existing Assisted Travel Policy, which is regulated and enforced by the ORR and requires stakeholder involvement to make changes to provisions at stations.

7. *Will all Customer Assistants have the same high level of training in the full range of ticket products to ensure there is maximum flexibility to provide expert assistance in navigating the complex fares system and ensure passengers get the right ticket?*

The AWC proposed Customer Ambassador roles for ticketing specialists will continue to receive the same standard of ticket knowledge and training as our existing ticket office staff have today, which will ensure that customers continue to get support in finding the correct ticket. This training encompasses all relevant sections of the TSA on ticket retailing.

8. *What should passengers do if they cannot find or buy the ticket, they need on a TVM, or get the information they need for their journey, and there are no staff available to help (for example, at the time of the first and last trains)?*

It is proposed that Customer Ambassadors with specialist ticketing knowledge are present at London Euston 0600-2200 Monday-Saturday and 0700-2200 on a Sunday. This does mean that some services, including those of other train operators and the final two AWC services

from London Euston Monday-Friday and on a Sunday depart before or after the ticketing specialist shifts.

If a customer cannot purchase a valid ticket for travel from digital channels (including our web or app or third party apps), our call centre or a TVM for any reason during this time, the same process will be applied as today when the ticket office is closed. The London Euston Revenue Protection Officers will be available until the last AWC train and present during boarding. They will be able to assist the customer using a TVM if appropriate or retail the ticket via a handheld ticket issuing device. In the event the Revenue Protection Team are not present at Euston and the customer has been unable to purchase a valid ticket for their journey using digital means or the TVM, then as set out in our existing Accessible Travel Policy, the customer can purchase a ticket on board **without penalty** from the Train Manager who will have a handheld ticket issuing device.

Future ticket retailing capability at Euston

- 9. What is the evidence to support AWC's view on the expected shift of ticket sales to online channels and TVMs if ticket offices are closed, and over what timeframe? As previously agreed, please also supplement the information given on the changing pattern of ticket sales through London Euston ticket offices and TVMs with the data in nominal terms.***

AWC are assuming a conservative 10% shift to digital methods of purchase to ensure that our analysis of remaining capacity is cautious and allows mitigations to be prepared on a worst-case scenario and ensure that capacity is fit for day one operations.

Evidence is taken from our own history of converting customers to digital purchase and fulfilment, as well as wider industry examples:

- Looking back, it has been the long-term retail strategy for AWC to move customers to book direct via the website or the app. For example, the current advertising campaign, (June 2023-March 2024) utilises targeted media in digital and social channels to direct customers straight through to our website or app to buy tickets. AWC has seen a significant shift away from station retail channels.
- AWC's comprehensive programme of digital marketing directs customers searching for the most common travel terms e.g. 'London to Manchester by train' straight to our website to make a booking or download the app.

- The loyalty programme, Club Avanti, rewards customers for booking via the web or app through a programme of benefits. The programme now has more than 200,000 members.
- The Customer Relationship Management programme (CRM) retains customers within the digital channels through email communication of critical journey information, enhancements to web and app functionality and seasonally relevant price promotions.
- Station and onboard posters and screens are utilised throughout the end-to-end customer journey to communicate the benefits of booking through the website and app. For example, the display of journey information in stations using QR codes that direct customers to our website
- For journeys on AWC trains originating from London only 6% were purchased from the station *ticket office or TVMs* in 2023; compared to 24% in 2014. In nominal terms, sales volumes from the *ticket office* itself were 1.3m in 2014 and reduced to 0.5m in 2023.
- Evidence from previous Ticket Office closures, such as Harlow Mill, supports that while there is an initial spike of increase in TVM usage at a location where the Ticket Office closed, this quickly returns to pre-closure levels before showing a continued decline in usage as more customers move to digital ticketing. Harlow Mill shows a 30% shift from closure to digital ticketing.

For movement to TVM, AWC are assuming a conservative 90% shift from the ticket office which allows us to plan that capacity is fit for day one operations. At this 90% assumption, the maximum utilisation of TVMs at the peak point across the entire week at Euston has been modelled at 62%. This peak point occurs on a Friday.

As seen above and in Station Specific Summary in Appendix 1, AWC have modelled a range of scenarios for transfer of issue volumes to TVMs, ranging from 90% of booking office transactions transferring to TVMs to 25% of booking office volumes transferring to TVMs. In all these scenarios at London Euston, there is remaining capacity at the maximum point of the day.

10. Please provide evidence to show that the proposed combination of staff, TVMs and handheld devices will be sufficient to manage future ticket sales at the station, especially at peak hours.

AWC will have sufficient staff, TVM capacity and handheld devices as part of these proposals, including during peak hours.

Staff hours are shown in *Station Specific Summary in Appendix 1*. The major change template spreadsheet (Annex B) and supporting documents sent to London TravelWatch on 5 July 2023, do show a proposed reduction in the headcount, which represents a reduction on current FTE, however this aligns resource to meet current ticket office demand as well as transaction hours. There is sufficient capacity to meet future ticket sales at the station, including during peak times, whilst still enabling staff to be visible and proactive in supporting customers with information needs.

This should include information on:

- a. overall and remaining TVM capacity (factoring in existing sales and Ticket on Departure collections per hour)***

TVM capacity is shown in the graphs contained in the *Station Specific Summary in Appendix 1*. These scenarios include a very conservative 10% shift to digital for ticket purchase and do not reflect a shift of online purchased tickets away from TVM collection to a digital barcode ticket fulfilment. Furthermore, this data assumed that all ticket purchases and collection shifting from the Euston ticket office would move to an AWC TVM, and therefore does not take account of the additional capacity from the five London NorthWestern Railway TVMs at Euston.

In all these scenarios we see remaining capacity at the maximum point of the day but will continue to engage with the wider industry regarding supporting the continued transition to digital (although this is not essential given the modelled capacity available at Euston it provides the opportunity for staff to focus on those who most need support).

Evidence from previous Ticket Office closures, such as Harlow Mill, supports that while there is an initial spike of increase in TVM usage at a location where the Ticket Office closed, this quickly returns to pre-closure levels before showing a continued decline in usage as more customers move to digital ticketing. Harlow Mill shows a 30% shift from closure to digital ticketing.

Further details on how we modelled TVM capacity:

AWC have modelled a range of scenarios for transfer of issue volumes to TVMs, ranging from 90% of booking office transactions transferring to TVMs to 25% of booking office volumes transferring to TVMs. In all these scenarios we see remaining capacity at the maximum point of the day. Assuming a 90% transfer of volumes from booking office to TVM, the maximum utilisation of TVMs at the peak point across the entire week at Euston has been modelled at 62%. This peak point occurs on a Friday. To model these scenarios, AWC validated transaction times by ticket type on a TVM and overlaid it against volumes of tickets being sold at booking office windows. This used historical transaction data from Euston ticket office, split into 15-minute timebands, by day of the week using data from FY23. The modelling of a 90% transfer from booking offices to TVMs identified the worst-case scenario of additional demand.

The same date range was used to determine current TVM usage, combining volume of tickets sold at the Euston TVMs, by ticket type sold in 15-minute segments, against the transaction time for specific ticket types. This enabled the total time that TVMs would be used in the event of all current ticket office issues transferring to TVMs. An additional 15 seconds was then added to each transaction to reflect a customer physically collecting their tickets and potentially placing them in a wallet or purse before moving away from the TVM.

The information from this analysis, created the total number of seconds, per 15-minute segment, by day of week, that the TVMs would need to accommodate being used for. For each TVM there is a total of 900 seconds of capacity in each 15 minute segment. This was then multiplied by the total number of AWC TVMs at Euston to determine overall TVM capacity in seconds within the 15 minutes. The graphs in Appendix 1 reflect the demand split by 15 minute segments, by day of the week, versus TVM capacity, and is shown as a percentage. The 4 scenarios shown are current demand, and then current demand with a 25%, 50% and 90% movement from the ticket office to TVMs.

b. contractual Service Level Agreements (SLAs) for TVM availability and for fixing out of order TVMs, and recent delivery against those SLAs.

We have a range of contractual service level agreements and expected response / resolution times in place with the TVM maintenance suppliers (for both hardware and software). These response times vary based on the severity of the incident. Due to the commercial sensitivities, specific SLA information will be provided separately to London TravelWatch. AWC will continue to use our procurement opportunities to support customer satisfaction as well as efficient use of taxpayer money.

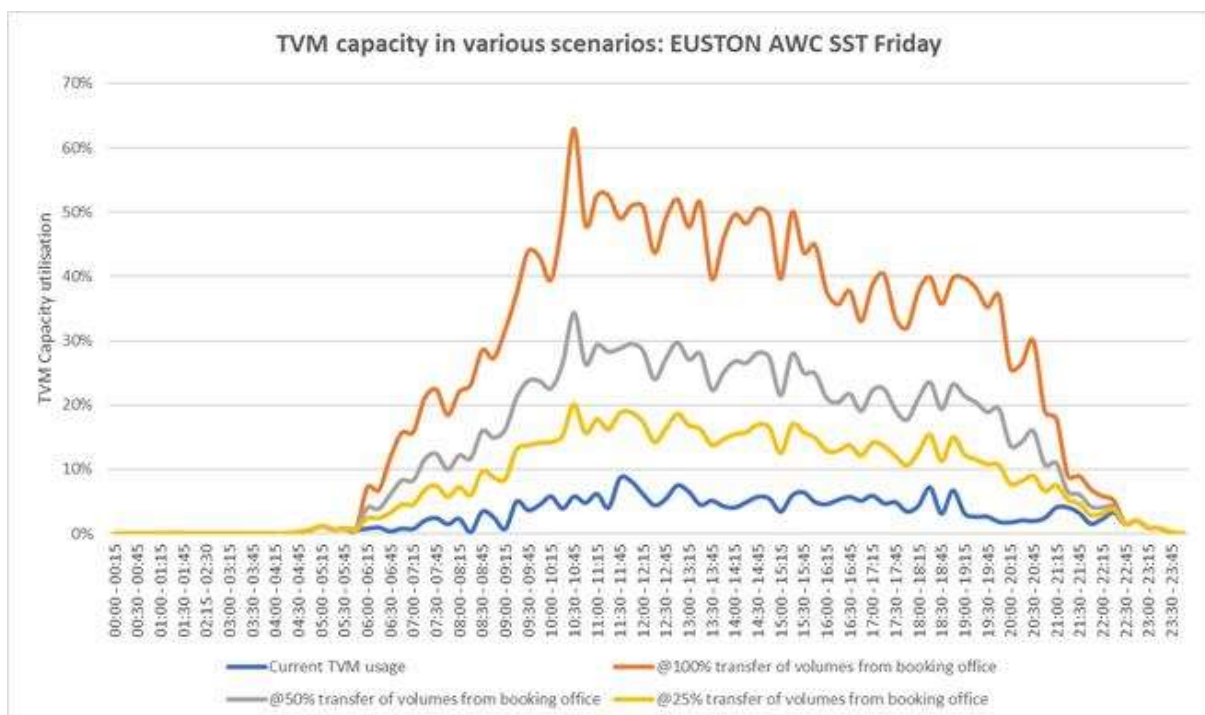
To support a high percentage of TVM uptime, AWC have developed real time monitoring of TVM activity that identifies issues such as low ticket stock, low cash levels etc. Station based colleagues receive real time alerts on their personal issue smart device of such

events to allow them to respond quickly in a proactive manner. A back office team will also monitor activity to ensure the TVM fleet is operating effectively.

c. the forecast level of cash sales of tickets at the station and the level of planned TVM capacity to service those sales

AWC will have sufficient TVM capacity to accommodate cash transactions at London Euston. We note that people who carry out cash transactions can move to card but cash transactions cannot otherwise move to digital.

As with overall TVM capacity, AWC have modelled a range of scenarios for transfer of cash issue volumes to TVMs, ranging from 100% of booking office transactions transferring to TVMs to 25% of booking office volumes transferring to TVMs. In all these scenarios we see remaining capacity at the maximum point of the day. Assuming a 100% transfer of cash volumes from booking office to TVM, the maximum utilisation of cash TVMs at the peak point across the entire week at London Euston has been modelled at 63% (Chart for Friday shown below). In addition, this does not take into account the LNWR cash and card TVMs which sit in the same bank as the AWC TVMs, nor those elsewhere in the station which provide further cash capacity.



- d. ***the proposed numbers and functionality of handheld devices (for example, can they service cash sales) available to on-duty staff, and ease of access to them, compared with current arrangements at the station.***

The handheld devices that will be used are the existing Ticket Issuing System (TIS) that are used within the ticket office. Currently these are used in a dock, they will be used in their handheld capacity. Their functionality does not change when used as a handheld and the full ticket range will continue to be available with all industry agreed methods of payment (including cash).

The volume of handheld devices on shift will be sufficient for each Customer Ambassador who is a ticketing specialist to have their own device. This volume has spare capacity, to allow for devices to be charged or if devices are out of use due to faults (based on current low fault levels).

Staff will have easy and quick access to handheld devices, enabling them to support customers who require a ticket type currently not retailed on TVMs. If there are sudden spikes in demand, staff can also have the machines on their person to queue bust.

- 11. *AWC has previously clarified that some facilities currently available from ticket offices today would not be available from a TVM, such as change of journey, excess fares, seat reservations and refunds, and that under the proposals these would be facilitated by a Customer Ambassador with a handheld device. Can you confirm that the current full range of facilities will continue to be available via a Customer Ambassador with a handheld device – for example, including split ticketing and annual season tickets?***

Yes. The handheld devices allow for the sale of the full range of products. If the customer cannot book digitally and cannot purchase from a TVM for any reason, the Customer Ambassadors will retail any products from the handheld device in line with the Ticketing and Settlement Agreement.

TVMs and handheld devices can retail products from any origin to any destination, and would therefore enable split journeys to be purchased.

- 12. Please clarify whether there is a possibility that, at some point after the proposed changes (if approved) are implemented, there might be further moves to end the sale of more specialist/lower volume fares products via TVMs or handheld devices – and if so, what safeguards would be in place to protect customers’ interests.**

AWC do not have any current plans to end the sale of specialist/lower volume fares or products via handheld devices or TVMs. AWC will continue to retail in line with the TSA and any future changes will be managed through the appropriate processes.

Support for passengers with accessibility needs and ensuring safety

- 13. Please confirm how the proposals to replace the 4 FTEs in the current AWC team at London Euston identified as having a role in providing accessibility support, will not adversely affect the Passenger Assist and Turn Up and Go services provided at the station.**

Pre-booked Passenger Assist and Turn Up and Go services will continue to be managed by the Network Rail Assisted Travel Team and are unaffected by any changes within this AWC proposal. Any customers that require assistance from this NR team will continue to be able to get the support they require.

At London Euston, AWC intend to retain a Pre-Boarder service - the proposed hours for Pre-Boarding duties are 1 shift Monday-Saturday 1030-1915 and 1 shift Sunday 1030-1900. The hours have been selected to reflect demand for the service and allow for efficient rostering.

The Pre-boarder activities consist of identifying customers that may need additional help with luggage, bikes, or pushchairs, as well as meeting and greeting large groups. These activities are outside of the usual Passenger Assistance service provided by Network Rail.

For customers not using the Passenger Assist service, station colleagues are all trained in disability awareness and will continue to be proactive in supporting customers. When required, this may mean that staff will guide the passenger to the Assisted Travel Lounge (which is immediately next to the TVM area) or to platforms or other areas of the station where appropriate. The fact that ticket specialists are not behind a counter gives the benefit that the member of staff can physically move with the customer in a way that is not possible today (and where it is the right decision for the balance of customers) - whilst the impact of these changes will be small, small steps can have a big impact on customer satisfaction.

14. What supporting evidence do you have to show that measures aimed at mitigating the risk of digital exclusion would be adequate? Do you have any existing programmes designed to tackle this issue, and if so, how effective have these been?

Customer Ambassadors with specialist ticketing knowledge will be available at London Euston 0600-2200 Monday-Saturday and 0700-2200 on a Sunday, to help customers that are unable to use digital channels. For customers unable to use digital channels due to lack of banking facilities or wanting to pay with cash London Euston has TVMs that accept cash in addition to staff being able to retail tickets for cash via handheld ticket issuing devices. Non-digital channels support will also continue to be available via our telesales team based in the contact centre. The contact centre is open seven days a week, 0800-2200, excluding Christmas Day and Boxing Day.

AWC have assessed potential impacts through an Equality Impact Assessments (EQIA) for London Euston which has identified potential impacts for those who are not digitally connected and the mitigations that we will put in place to ensure there is no negative effect on these customers include cash and card TVMs as well as staff being on hand and able to retail the full range of tickets.

In addition, AWC already support charities to tackle the way that poverty can cause digital exclusion by donating old laptops to be securely refurbished for the benefit of those who cannot afford technology. We also support groups like Age UK who use the community room at our stations. We are committed to working with existing partners and forming new partnerships, to support wider community organisations tackling digital exclusion.

15. Please provide details on the outcomes of the accessibility user trials and accessibility related reviews referred to in the EQIA

As part of AWC's commitment to continually improve the experience of rail travel for customers with accessibility needs, user trials of TVMs commenced on Saturday 9 September 2023 and are planned to be completed by the end of September 2023. AWC will be happy to update London TravelWatch on the outcome of the user trials once they have concluded.

Our TVMs are industry leading and have been developed against existing accessibility standards. They have the screen and card readers at a height that is usable for customers in wheelchairs, they are all undercover and protected from the weather. In addition, the screen has antiglare properties so that it can be read in direct sunlight.

As you will see from the updated EQIA for London Euston (which will be published on the AWC website on 28 September 2023), AWC reviews into induction loops and the queueing system have resulted in commitments to provide these items in a way that will fully support customers using information and ticket retailing services at London Euston.

16. Please provide details of any concerns with the BTP may have raised with you about potential safety and security risks to passengers and staff arising from AWC's proposals for London Euston.

Safety and security is a key priority and AWC has regular engagement with the British Transport Police (BTP) to understand any safety and security trends on our network. In recent discussions about the TSA proposals for London Euston, no insurmountable concerns were raised. Considerations focussed on the potential impact on both station staff and the public from anti social behaviour. Lower risks were also identified to property and infrastructure. BTP have agreed to work with AWC as part of any proposed implementation to ensure crime and security considerations remain a key priority of the project.

In addition to this, the Department for Transport (DfT) and British Transport Police (BTP) have agreed that Operators should complete a Crime and Vulnerability Risk Assessment reflecting the change proposals once discussions with the Passenger Bodies have been finalised. This assessment was produced by DfT in collaboration with the BTP for TOCs to complete for each station and will be completed on conclusion of the TSA consultation.

Potentially relevant wider developments

17. We look forward to receiving further details about relevant wider developments at London Euston, as highlighted above in the main letter

Thank you for the opportunity on 12 September to present the current passenger journey through London Euston station and the short and longer terms plans for the station. The proposal to move specialist ticketing staff out from behind the counter not only responds to customer behaviour and modern expectations of retailing and is also cost effective but also provides benefit in support of the wider development at London Euston to increase staff visibility and the station environment.

Next steps

Please do not hesitate to contact me if you require further information or have any clarifications or questions. Please could you also let me know if you continue to have any concerns or develop any new concerns, to give AWC the opportunity to refute or clarify before a final decision is taken.

Yours sincerely

[REDACTED]

[REDACTED]

Appendix 1 – London Euston Station Summary

Appendix 2 – London Euston Equality Impact Assessment