

31st October 2023

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Govia Thameslink Railway

(sent via e-mail)

Dear ██████████

Govia Thameslink Railway (GTR) Proposals to close ticket offices under the Major Change Process of the Ticketing & Settlement Agreement (TSA)

I am writing to you in response to GTR's plans to close all ticket offices at 113 stations where GTR (covering Great Northern, Gatwick Express, Southern and Thameslink) is the lead retailer and which fall within our geographical remit, as part of a wider programme of industry reform.

We have been analysing the information provided to us as part of the TSA process, including the Major Change template spreadsheet (Annex B), your letter of 28th September in response to ours of 6th September (attached in Annex 1 and 2 respectively), and other supporting documents. We are grateful to you and your colleagues for responding to our queries throughout the process through email and via Teams meetings, which have also helped inform our decisions.

As you know, we have also conducted a public consultation on the proposals put forward by GTR and eight other operators in our area. The extended public consultation period closed on 1st September and during that time we received 232,795 responses in total. 29,987 of these responses were specific to GTR. We have now processed these responses and included a summary of the resulting analysis in this letter.

Summary of the proposed changes

Following a number of revisions to the original proposals, we understand the main changes being proposed at GTR stations as follows:

- the closure of ticket offices at 113 stations. All ticket office windows will close, with staff moving to other areas of the station and working in new multi-skilled Station Host roles. This is part of a wider industry programme to reduce costs and deliver more efficient customer service
- staffing hours will remain at least the same as current ticket office opening hours at all stations, which reflects an improvement on GTR's initial proposals

- replacing ticket sales at station ticket office counters with a combination of increased online sales, purchases made via existing TVMs and ticket office retail machines (TOMTIS), which will be kept at all stations
- mitigations to help support passengers with the proposed changes include:
 - the introduction of “Welcome Points” to provide people a place to go if they need assistance or advice from a member of staff
 - improvements to TVMs, including increasing the range of tickets that can be bought from them
 - maintaining TOMTIS machines at each station so that all tickets can continue to be bought at stations, with cash if desired.

Public response to the changes

During the consultation period London TravelWatch received a total of 232,795 representations via email, freepost and phone.¹ These were a combination of responses to individual stations, specific TOCs and to the proposals across all companies and stations. Of these 231,471 (99%) were objections. 57,179 responses objected to all changes across the rail network.

There were specific campaigns which generated a large number of responses including template emails and post. While the majority of these responses followed the standard text, some had been customised. All have been counted and any that have been customised or contain reference to a specific station identified.

We received postal petitions with a total of 15,923 signatures generally objecting to ticket office closures. We also received copies of the following online petitions:
 Change.org - <https://www.change.org/p/save-our-railway-ticket-offices>
 Megaphone - <https://www.megaphone.org.uk/petitions/cut-their-profits-not-our-ticket-offices>

We are also aware of the following online petitions:

Parliament - <https://petition.parliament.uk/petitions/636542>

38 Degrees - <https://act.38degrees.org.uk/act/keep-ticket-offices-open-petition>

We received a survey report from 38 Degrees with 26,194 responses objecting to the changes nationally.

We received many responses from stakeholders including MPs, local authorities and representative organisations.

GTR received 29,987 responses specific to their stations. Of these, 29,930 were objecting to the proposals. Objections were received for all GTR stations where

¹ Please note some of these responses will overlap with those received by Transport Focus, as some representations were jointly sent to both organisations.

proposals were put forward. We also received nine petitions for eight GTR specific stations. A station-by-station breakdown can be found in Appendix 1.

The top three issues in these responses were concerns over the ability to buy tickets in future (including needing staff to help them navigate the complexities of the fares system and difficulties in using TVMs), the provision of information needed to plan journeys (including during periods of disruption) and how passengers requiring assistance would receive help and support. Throughout the responses the importance and value of staff in delivering these services and support was highlighted time and again.

It is important to note that these are the number of *responses* to the consultation and *not* the number of people who responded. Under the TSA the train companies were, in effect, seeking views on each station in their area – it was not a national consultation. Therefore, it was possible for people to choose to respond to multiple station and/or TOC consultations.

Our role under the TSA

London TravelWatch has a formal role in assessing Major Changes to ticket office opening hours. If a train company wishes to make such a change it must follow the process set out in the TSA.

Under clause 6-18 (1) of the TSA, changes to opening hours of ticket offices may be made if:

- a. the change would represent an **improvement** on current arrangements in terms of quality of service and/or cost effectiveness and
- b. members of the public would continue to enjoy widespread and easy access to the purchase of rail products, notwithstanding the change.

London TravelWatch may object to a proposal on the grounds it does not meet one or both of these criteria. To assess this, we have reviewed the following factors which we have derived from section 5 of the Secretary of State's TSA ticket office guidance (21 February 2023):

- **Quality of service.** This includes the number and skills of station staff and hours deployed, availability of facilities like toilets, waiting rooms and lifts, and provision of information such as wayfinding, routes, and during disruption.
- **Access to products.** Can passengers easily buy the right ticket for their journey? This includes the product range available at the station and off-site, support to get the ticket including advice on the correct fare, and retail capacity. Passengers should also be confident that if they have to travel without a ticket (for example if it's not available at the station) then they will not be unfairly penalised.



- **Accessibility.** Passengers needing assistance should receive this in a timely and reliable manner. This includes arrangements for booked assistance, the ability of passengers to ‘turn-up-and-go’, the ease of requesting assistance, the ability to pay by cash or card, and the accessibility of ticket purchasing methods including ticket vending machines (TVMs) and non-digital options.
- **Safety.** This includes both perceived and actual security, access to help if needed, and support if there is a safety issue.
- **Future monitoring.** How will train companies ensure that changes are working well for passengers? In addition, what, if any, protections are in place to ensure that, where appropriate, passengers are consulted on future major changes to staffing?
- **Cost effectiveness.** Do the financial benefits outweigh any costs that the changes may incur, including through funding mitigations or any potential loss in revenue?

We have also considered generic issues and mitigations where in our view they are material to assessing the proposals against the factors.

Our assessment of the proposals

London TravelWatch understands how GTR’s proposals could be positive for passengers. In principle, we support the more flexible use of staff to better help passengers at stations. By making staff more visible and accessible, it should drive higher rates of customer satisfaction and lower costs of sale to support a more financially sustainable railway for the future. This approach is particularly sensible for stations which are now seeing low sales at their ticket offices.

However, the key question for London TravelWatch to consider is whether the detail and supporting evidence provided is strong and robust enough to give us the reassurance we need that an improvement in passenger experience will begin as soon as GTR’s proposals are implemented.

We share the view expressed recently by the Transport Select Committee that it is “perplexing” that the rail industry has put forward proposals before the promised simplification of fares and ticketing has been delivered. Part of the reason why passengers value the presence of ticket office staff is because, for some, they are an essential source of advice in buying the best ticket for their journey. That arises from the perceived complexity of today’s rail fares and the fear that passengers may not be getting the best deal for their travel. We believe that closing ticket offices should happen after fares reform has taken place and shown to be a success.

Nevertheless, we have considered carefully the results of the public consultation on your original approach and, together with our own analysis of the proposals themselves, we have come to the following views on the aforementioned six factors.

Quality of service

Our focus under this category is on the potential impact of staffing hours and staffing levels, provision of information and availability of facilities.

The proposals aim to improve service quality through a more visible staff presence at the station. Station Hosts would be more available to passengers in helping them buy tickets, providing information about services, giving wayfinding directions around the station and offering pre-boarding support.

Further to revisions made after the close of the consultation period, we note that there is now no proposed reduction of station staffing hours within the London TravelWatch area.

The level of staffing would also be maintained at many stations, including East Dulwich, Cricklewood and Winchmore Hill. However, at other stations, such as Caterham, Finsbury Park and Harpenden there would in future be fewer staff, as the current Gateline and Ticket Office staff are merged into the new Station Host role but with fewer staff in the new role than in the current roles combined.

GTR did not provide London TravelWatch with weekend staffing numbers for their stations, though GTR expect to adhere to the following principles:

- at all stations where there is currently a ticket office, but no gateline, at least one member of staff will be present for existing ticket office hours in the proposed new ticketing assistance role
- at all stations where this is both a ticket office and a gateline, at least one member of staff will be present for existing ticket office or gateline hours, depending on whichever is currently greater in the proposed new ticketing assistance role.

While these principles do provide some information, without even provisional numbers it is not possible for us to assess properly the current and proposed levels of staffing. Taken together, our observations regarding staffing levels and staffing hours for those stations mean that we are unable to judge whether the proposals would result in an improvement in quality of service.

The exception to this are those stations where ticket offices are already closed at weekends or where it is now proposed to newly staff the station on both Saturday and Sunday, though these are significantly in the minority.

Our station-by-station decisions can be found in Appendix 2.

Looking further ahead, we are concerned that in future passengers would not have the same opportunity to scrutinise and comment on potential further changes to staffing levels as today. This is because the TSA process would not apply in a situation where there is no longer a ticket office at a GTR station.

The rail industry has argued that this concern can be addressed through the current arrangements under which operators comply with an ORR-approved Accessible Travel Policy (ATP). It is good that the industry has now recognised there is an

issue here, but the ATP proposal has emerged at an advanced stage of the consultation process and has not been fully explored.

Our view is that the ATP approach offers weaker protection for passengers' interests than the TSA, under which bodies such as London TravelWatch are not merely consulted but are asked to approve or object to proposals. We recognise that satisfactory resolution of this issue is not something that GTR can determine alone, but until it is in place we object to the proposals to close the ticket offices at GTR's stations.

Access to products

Our focus in this category is on how far GTR's proposed combination of TVM capacity/capability and staff support at the station would, alongside other sales channels, ensure continued widespread and easy access to the purchase of rail products.

GTR have outlined that digital ticketing already accounts for approximately 69% of journeys on its network, and that they expect this to increase as the shift to digital continues. GTR also expects sales to decline to similar levels as at their London ticket offices (1-3% of sales). While we recognise the trend towards digital purchases, we question if this projection may be underestimating in-person demand given the simpler fares structure in London compared to outside the capital, where more advice from staff may be needed.

We welcome the confirmation from GTR that under these proposals it would still be possible for passengers to buy the same full range of rail products at its stations. That will be possible through the combination of transactions via the existing fleet of TVMs (whether entirely self-serve or with the help of nearby station hosts, who GTR assure us will have appropriate training) and via ticket office retail (TOMTIS) devices, which are currently used in the ticket office and which will in future be available for staff to use to sell tickets not available on TVMs. It is also positive to note GTR plan to replace these machines as they approach their "end of life" in the next 12 months with handheld machines, which will continue to allow staff to sell all tickets.

We note there are plans to improve TVM functionality, including the ability to buy advance fares directly from these machines. While these in theory should improve the retail experience for passengers, they are subject to funding and supplier timescales, and are not expected to be introduced until late 2024. We would like to see these improvements secured before the closure of ticket offices at GTR stations, and a commitment to keep TOMTIS and handheld ticket machines at all stations to help "queue bust" until the TVM upgrades are in place.

Additionally, based on the information which GTR has provided to us, we have remaining concerns about whether existing TVMs will have sufficient capacity to cope with the likely increased demand resulting in the shift from ticket office sales to TVM sales. GTR has considered TVM capacity at each station, and while we acknowledge that some ticket office sales will move to online channels instead of



TVMs, we still expect a significant number to be completed at a station. At stations where ticket office sales are low, we anticipate TVMs will be able to absorb these, but we question if TVMs have enough capacity at stations where ticket office sales are relatively high (such as Bedford, Luton and Stevenage), particularly during peak hours. Only Coulsdon Town will receive an extra TVM under the proposals, although GTR have confirmed that handheld ticket machines will be available to help staff “queue bust” at certain stations. While this is positive and would increase retail capacity, we have not been provided a list of the stations where they will be available, only a list of where they are currently used. This is indicative of placement, but it presents difficulties in judging the impact on a station-by-station basis.

If GTR’s assumptions about channel switching are not correct there remain questions as to whether in practice TVMs have enough capacity at stations where ticket office sales are relatively high, particularly during peak hours. If they do not, there may be unacceptable queuing times for passengers, which may result in missed trains. GTR has said it will use reasonable endeavours to minimise queues at TVMs but have not committed to a clear maximum queuing time metric.

A commitment to a queuing time metric would help address this uncertainty on our part about if stations would have enough retail capacity under these proposals. A robust metric and reporting regime (based on the existing standards at ticket office windows) would create a review mechanism that would trigger action (such as issuing more hand-held ticket devices for staff to sell tickets with) if projections are wrong and queues exceed targets.

We have a further concern related to the objective of encouraging further migration of sales to online channels. National Rail Enquiries and train operators (TOC) websites for some time have mis-represented many national rail fares in the London area by displaying them as the “cheapest fare” for a rail journey, when there is often a cheaper (but less prominently displayed) rail option via TfL Oyster or Contactless payment.

Consequently, encouraging more people to buy tickets online, as envisaged under the ticket office closure proposals, currently risks directing more passengers to more expensive fares than they need to pay. London TravelWatch have raised this concern with the RDG, but despite some encouraging signals, there is as yet no agreed “fix” nor a firm timescale for introducing it. A solution needs to be put in place successfully before London TravelWatch can support GWR’s proposed changes.

Accessibility

We know from responses to the public consultation that there is much concern about the potential impact of the ticket office closure proposals on those passengers who have particular needs when boarding/alighting trains or buying tickets.

Passenger Assist and Turn Up and Go services are of particular interest. GTR plans state that sufficient staffing levels will be in place to ensure customers receive the same service as they do today. We note that in the latest ORR survey of experiences of Passenger Assist (July 2023), GTR passengers were less likely than



the overall sample to state that they were very satisfied with the assistance they received at the station. We also note the opportunity for Station Hosts to provide more assistance by being able to move about the station.

However, we question if this will truly be an improvement at stations where staff numbers are being reduced, as overall there will be fewer staff available to provide help. With multi-skilled roles, while again providing more flexibility, it is important to make sure there are sufficient staff levels to still complete required tasks – for example, a staff member may be needed to help sell a ticket at the same time as another passenger may need assistance getting to a platform.

We also note that train operators have proposed an industry-wide concept of Welcome Points as a constructive response to concerns about the potential impact of ticket office closures on accessibility. It is also positive that GTR have proposed to introduce an enhanced accessibility meeting point compatible with hearing loops to notify a member of station staff that a customer who needs assistance has arrived.

We think there is merit in the Welcome Points idea, but there is much that still needs to be developed, such as a mechanism for alerting staff that someone is at the Welcome Point and needs assistance, whether induction loops would be fitted, clarity over what support will be provided to passengers and whether the welcome points will be fixed. The RDG's letter of 11 October sought to address these points but it is clear that there is still no real certainty for passengers on what would be provided.

We are also very conscious that Welcome Points were not explained as part of the consultation, so passengers have not had the opportunity to comment on these plans or to highlight potential concerns. We believe it is important that there is further engagement with the Disabled Persons Transport Advisory Committee (DPTAC) and with Disabled people and representative groups to secure their endorsement on the concept, design and implementation of Welcome Points. We also believe they should be piloted/trialled to establish what works best at different types of stations and how passenger feedback on them. Our approval of the proposals on ticket offices would need to await the outcome of these pilots.

With regard to buying tickets, GTR have helpfully confirmed that passengers will still be able to carry out cash transactions at stations either through TVMs (with the exceptions of Brookmans Park and Essex Road, which are card only) or by purchasing from a member of staff using a TOMTIS machine at all stations. Staff will also provide support to passengers using the TVMs if needed.

Safety

We welcome the discussions which GTR have held with the British Transport Police (BTP) about the safety and security aspects of the proposals to close ticket offices. We note the intention to complete a Crime and Vulnerability Risk Assessment (produced by the Department of Transport in collaboration with the BTP). Our view

is that that should be done and any mitigations identified as necessary implemented before we can approve the proposals.

Future monitoring

We believe it is important to have clarity in advance about the arrangements to monitor the implementation of the proposals. Having a clear set of agreed, publicly reported yardsticks on quality of service allows operators to show how well their proposals are working and helps passengers to hold operators to account.

GTR have noted that they will evaluate their retail proposition through internal review including its Service Quality Regime system, customer insight channels and external survey work.

We also note that the Rail Delivery Group (RDG) has said that, to ensure an impartial baseline and assessment of the proposals is available, operators propose to use the National Rail Passenger Survey previously conducted by Transport Focus. As that survey was paused in 2020 due to Covid, the RDG has been developing the Rail Customer Experience Survey which is due to start in 2024 and which it is suggested will track future metrics.

Our view is, taking all these points together, there is considerable work yet to be done by GTR working with other operators, passenger bodies and others to agree which specific core metrics will be used and which recent measurements will be used to provide a meaningful baseline against the success or otherwise of the proposals could be measured. We would also have expected to see some indication of the expected future movement in the measured scores to support GTR's view that the proposals will deliver an improvement in one or other aspect of quality of service. We need the arrangements for future monitoring of implementation to be agreed with us and in place before we can endorse the proposals.

Cost effectiveness

Under the TSA, cost effectiveness is one of the specific criteria we are asked to consider in assessing the proposals. GTR have not been able to share any figures on the cost-effectiveness of the proposals due to the confidential nature of commercially sensitive information. However, GTR do not anticipate a decline in revenue and benefits will accrue over time due to the reduced cost of sale per ticket, increased competitiveness of rail, more effective deployment of the workforce, increased discovery by customers of other rail products, and improved sales data acquisition with the ability to refine operations in response.

We understand that some of the information may be sensitive, but we are disappointed that the industry has not been able to find a way, at individual TOC level, to share some quantitative detail in terms of the overall scale of net financial benefit; the ratio of benefit to costs; the full set of costs and benefits assessed; and the payback period.



The lack of available evidence is all the more remarkable given the emphasis that has been placed by the rail industry and government on improved value for money as a selling point for the proposed closure of ticket offices. Without this information, we cannot with confidence judge whether the proposals would represent an improvement on current arrangements in terms of cost effectiveness. We therefore have little option under this category but to object to the proposals.

Decision and next steps

Given the above assessment, London TravelWatch objects to the proposals put forward by GTR for all 113 stations based on the following reasons:

- we are unable to conclude that the proposals would result in an overall improvement in quality of service, with issues of particular note:
 - a lack of information on weekend staffing levels at 93 stations (Appendix 2), so no judgement on the proposals can be formed
 - at the stations where judgement is not impeded by lack of weekend staffing information, concerns remain about retail capacity (at Earlswood and Watton-at-Stone) and concerns about the ability to pay by cash (at Brookmans Park and Essex Road, as TVMs at these stations do not accept cash - though we note the ticket office machine being retained will)
 - across stations more widely, we also have concerns about retail capacity at stations with higher ticket office sales, and if TVMs will be able to absorb demand at these locations. We are unable to draw a firm conclusion due to lack of evidence
- agreement has not yet been reached with the rail industry on how passengers' interests might best be represented in future, should proposals be brought forward for further staff reductions after the current ticket offices are closed
- we remain unclear as to how far TVMs have enough capacity to manage a potential shift of transactions away from ticket offices, particularly at stations where ticket office sales are relatively high; and improvements to TVMs, while welcome, are still in development and contingent on funding
- the continued mis-representation of London rail fares on National Rail Enquiries and TOC websites has not yet been properly resolved
- GTR, working the other operators, needs to secure the endorsement of DPTAC, Disabled people and representative groups on the concept, design and implementation of Welcome Points
- the proposed Crime and Vulnerability Risk Assessment has not yet been completed, nor any identified mitigations implemented
- a set of specific core metrics and baseline measurements has not yet been established against which to measure the impact of the proposals

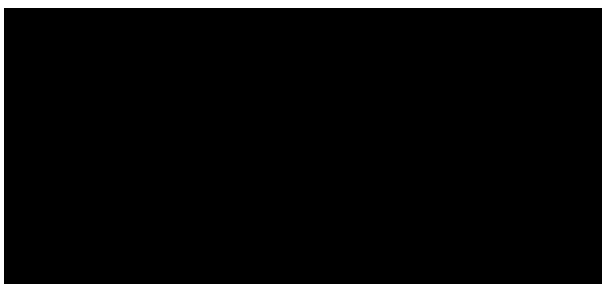



- we cannot with confidence judge whether the proposals would represent an improvement on current arrangements in terms of cost effectiveness.

If GTR still wishes to proceed with these proposals, in order for us to withdraw our objection we would require these issues to be fully addressed first. Alternatively, GTR may appeal our decision to the Secretary of State for Transport, at which point our involvement in this process will end.

We would like to extend our thanks to you and your colleagues for engaging with us throughout this process. If you have any questions please do let us know.

Yours sincerely,




, London TravelWatch

Appendix 1: Breakdown of public responses for each GTR station

Station	Objections	Petitions
Alexandra Palace	25	
Ashted	152	
Balham	40	
Battersea Park	3	
Beckenham Hill	6	
Bedford Midland	426	
Bellingham	7	
Bowes Park	8	
Brookmans Park	9	
Carshalton	39	
Carshalton Beeches	54	
Caterham	37	
Catford	22	
Cheam	45	
Chipstead	3	
Coulsdon South	43	
Coulsdon Town (Formerly Smitham)	11	
Cricklewood	12	

Station	Objections	Petitions
Crofton Park	25	
Cuffley	11	
Denmark Hill	25	
Dorking	64	1 petition with 93 signatures
Drayton Park	1	
Earlswood	6	
East Croydon	217	1 petition with 11 signatures
East Dulwich	9	
Elephant & Castle	8	
Elstree & Borehamwood	31	
Enfield Chase	31	
Epsom	164	
Essex Road	6	
Ewell East	8	
Farringdon	8	
Finsbury Park	124	
Flitwick	74	
Gipsy Hill	28	
Gordon Hill	20	
Grange Park	4	
Hackbridge	7	
Hadley Wood	3	
Harlington	25	
Harpenden	173	
Hatfield	94	
Haydons Road	10	
Hendon	6	
Hertford North	96	
Horley	52	
Hornsey	18	
Kenley	7	
Kingswood	5	
Knebworth	20	
Leagrave	45	
Leatherhead	85	
London Blackfriars	14	
London City Thameslink	45	
London St Pancras	56	
London Victoria	71	
Loughborough Junction	18	
Luton	81	
Luton Airport Parkway	21	
Merstham	63	
Mill Hill Broadway	20	
Mitcham Eastfields	54	
Mitcham Junction	12	
New Barnet	29	



Station	Objections	Petitions
New Southgate	20	
Norbury	25	
North Dulwich	14	
Nunhead	7	
Oakleigh Park	19	
Oxted	88	
Palmers Green	81	
Peckham Rye	48	
Potters Bar	71	
Purley	58	
Purley Oaks	12	
Queens Road Peckham	16	
Radlett	14	
Ravensbourne	2	
Redhill	71	
Reedham London	1	
Riddlesdown	15	
Salfords	11	
Sanderstead	66	1 petition with 620 signatures
Selhurst	4	
South Bermondsey	4	
South Croydon	22	1 petition with 14 signatures
St Albans City	315	
Stevenage	326	
Streatham	45	
Streatham Common	31	
Streatham Hill	30	
Sutton Surrey	101	
Tadworth	10	
Tattenham Corner	19	
Thornton Heath	21	
Tooting	30	
Tulse Hill	16	
Upper Warlingham	33	1 petition with 126 signatures
Waddon	42	1 petition with 110 signatures
Wallington	37	
Wandsworth Common	17	
Watton At Stone	8	
Welham Green	14	
Welwyn Garden City	75	
Welwyn North	33	
West Hampstead Thameslink	17	
West Norwood	57	
Whyteleafe	41	2 petitions with a total of 315 signatures
Whyteleafe South	7	
Winchmore Hill	43	

Station	Objections	Petitions
Woldingham	2	1 petition with 59 signatures
Woodmansterne	9	

Appendix 2: List of GTR stations with London TravelWatch decisions

In addition to the reasons listed above under the Decision and next steps, we **object** to the proposed closure of the ticket offices at the following 84 stations because no staffing levels information has been provided for weekends to enable a judgement on the proposal to be formed.

We have further concerns at stations in this group with higher ticket office sales, but have been unable to make a firm judgement due to lack of evidence, which is further grounds for objection.

- Ashtead
- Balham
- Battersea Park
- Bedford Midland
- Bellingham
- Carshalton
- Carshalton Beeches
- Caterham
- Catford
- Cheam
- Coulsdon South
- Coulsdon Town (formerly Smitham)
- Cricklewood
- Crofton Park
- Cuffley
- Denmark Hill
- Dorking
- East Croydon
- East Dulwich
- Elephant & Castle
- Elstree & Borehamwood
- Epsom
- Essex Road
- Ewell East
- Farringdon
- Finsbury Park
- Flitwick
- Gipsy Hill
- Hackbridge
- Harlington
- Harpenden
- Hatfield
- Hendon
- Hertford North
- Horley
- Kenley
- Knebworth
- Leagrave
- Leatherhead
- London Blackfriars
- London City Thameslink
- London St Pancras
- London Victoria
- Loughborough Junction
- Luton
- Luton Airport Parkway
- Merstham
- Mill Hill Broadway
- Mitcham Eastfields
- Mitcham Junction
- Norbury
- North Dulwich
- Oakleigh Park
- Oxted
- Peckham Rye
- Potters Bar
- Purley
- Purley Oaks
- Radlett
- Redhill
- Reedham London
- Riddlesdown
- Sanderstead

- Selhurst
- South Bermondsey
- South Croydon
- St Albans City
- Stevenage
- Streatham
- Streatham Common
- Streatham Hill
- Sutton Surrey
- Tadworth
- Tattenham Corner
- Thornton Heath
- Tulse Hill
- Upper Waringham
- Wallington
- Wandsworth Common
- Welwyn Garden City
- Welwyn North
- West Hampstead Thameslink
- West Norwood
- Whyteleafe

We **object** to the proposed closure of the ticket offices at the following nine stations because, whilst we welcome the proposal to introduce staffing on Sundays, no staffing levels information has been provided for Saturdays to enable a judgement on the proposal as a whole to be formed:

- Alexandra Palace
- Enfield Chase
- Gordon Hill
- New Barnet
- Nunhead
- Palmers Green
- Queens Road Peckham
- Tooting
- Winchmore Hill

We **object** to the following four stations because we have additional concerns about retail at the stations:

- Brookmans Park – concerns about ability to pay by cash, noting that the TVM at this station does not accept cash, although the ticket office machine being retained does accept cash
- Essex Road – concerns about ability to pay by cash, noting that the TVM at this station does not accept cash, although the ticket office machine being retained does accept cash
- Earlswood – concerns about lack of retail capacity
- Watton-at-Stone – concerns about lack of retail capacity

