

31st October 2023

[REDACTED]
[REDACTED]

Greater Anglia

(sent via e-mail)

Dear [REDACTED]

Greater Anglia's Proposals to close ticket offices under the Major Change Process of the Ticketing & Settlement Agreement (TSA)

I am writing to you following Greater Anglia's letter of 5th July to London TravelWatch, setting out plans to close ticket offices at stations where Greater Anglia (GA) is the lead retailer, as part of a wider programme of industry reform.

Proposed changes relating to 14 stations fall within our geographical remit. We have been analysing the information provided to us as part of the TSA process, including the Major Change template spreadsheet, your letter of 27 September in response to ours of 6 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 GA 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. 14,592 of these responses were specific to GA. 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 by GA regarding the 14 stations in our remit as follows:

- closure of all ticket office counters at 14 Greater Anglia stations within the London TravelWatch geographical remit, spread out over three "phases". Ticket offices will remain in place with different hours at London Liverpool Street and Stansted Airport, but GA have submitted these changes via the minor changes process, so are not in our remit

- staff will move to other areas of the station and working in new multi-skilled Station Host roles to improve visibility and flexibility. This is part of a wider industry programme to reduce costs and deliver more efficient customer service
- staffing hours will remain the same at most stations, although some will see a small reduction in hours. This reflects an improvement on GA's initial proposals, as they have since committed to restoring hours at stations that had more significant cuts to hours. This includes Ware, Waltham Cross, Sawbridgeworth, Hertford East and Harlow Town
- 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. The latter were not included in the original proposals, but GA have now committed to keep these 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 ticket office machines at each station so all tickets can continue to be bought at stations, including 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 Train Operating Companies (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:

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

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

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

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

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

Greater Anglia received 14,592 responses specific to them. Of these 14,573 were objecting to the proposals. Objections were received for all the stations GA put forward proposals for. We also received 7 petitions for 5 of these 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?

Our assessment of the proposals

London TravelWatch understands how GA'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. Additionally, the use of mobile staffing teams to supplement (and not replace, as in the original proposals) static station staff can provide extra and more flexible support as needed.

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 comfort we need that an improvement in passengers' experience will begin as soon as train operator 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 6 factors.

Quality of service

We understand that with regards to staffing hours (with a focus on static multi skilled passenger facing roles, as opposed to dispatch), taking into account the revised proposals:

- There will be an increase in staffing hours compared to current ticket office opening hours at Bishop’s Stortford, Brimsdown, Broxbourne, Cheshunt, Enfield Lock, Harlow Town, Rye House, Shenfield and Tottenham Hale
- There will be a decrease in staffing hours at Sawbridgeworth (a decrease of 45 minutes Monday to Friday), St Margarets (a decrease of 10 minutes Monday to Friday and 15 minutes on Saturdays) and Ware (a decrease of 15 minutes on Sundays)
- Hertford East will have a 10 minute overall increase in staffing hours on Saturdays, though these will be shifted slightly from 07:40-14:30 to 07:00-14:00
- Waltham Cross will have an increase of 5 minutes in staffing hours on Saturdays and a decrease in staffing hours of 30 minutes on Sundays.

Given this, where staffing hours are maintained or increased we believe this will be a continuation or improvement respectively to the quality of service for passengers. Where this is a decrease in staffing hours, to judge their suitability we have considered these in line with ticket office sales during times when they would no longer be staffed. During the affected times the transaction numbers are all very low. This, combined with the small nature of the decreases, means that on this point it would not necessarily result in a worsening of services for passengers.

The exception is Sawbridgeworth, which will see a 45 minute decrease in staffing hours Monday to Friday. Though we are satisfied this would not present an issue in terms of retail, the length of the decrease as a proportion of the current ticket office hours on these days (06:15-14:00) is high enough that it may worsen other aspects

of service, most notably accessibility, for passengers. This is grounds for an objection.

While the majority of the staffing hours will be kept, there will be some reduction in staffing numbers. We understand that these are largely due to the removal of the dispatch roles, and there will be minimal impact on the levels of customer facing roles (which will actually increase in number at some stations). The exceptions to this are:

- Cheshunt, which will see a decrease from 4 members of staff to 3 Monday to Saturday (no change on Sundays)
- Hertford East, which will see a decrease from 2 members of staff to 1 Monday to Friday (no change on Saturdays)
- Waltham Cross, which will see a decrease from 3 members of staff to 1 Monday to Friday (no change on Saturdays or Sundays)
- Ware, which will see a decrease from 2 members of staff to 1 Monday to Saturday (no change on Sundays).

While we recognise that these lower staffing levels reflect lower levels of sales activity, it is not evident that they represent an improvement in quality of service. The reduction may be small in number but high as a proportion to the current number of staff. There is a particular risk at stations where staff numbers are being reduced to one that staff will be unable to meet competing needs of passengers, for example if one person needs support using a TVM while another person needs accessibility support.

We do note that mobile teams that will be introduced as part of these proposals are likely to improve the service at stations that are not currently staffed at all, as well as extending hours of support at other stations. These commitments mean that GA will also be able to maintain the availability of facilities available to passengers at all stations.

However, 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 GA 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 GA can determine alone,



but until it is in place we object to the proposals to close the ticket offices at GA stations.

Access to products

Our focus in this category is on how far GA'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.

GA has noted it has significant experience in successfully migrating customers to digital channels following the closure of ticket offices, with good learnings and evidence to draw upon. They have provided a range of case studies evidencing the increased usage of digital channels by passengers over time. It is expected that with additional marketing support planned, and an increased customer preference for digital channels post Covid, that a large proportion of customers will move to digital channels if ticket offices are closed. While in GA's TVM retail capacity calculations (discussed later in this letter) it has used a deliberately low and conservative 15% conversion rate onto online channels, previous evidence suggests the actual switchover to online channels would be much higher.

In GA's Equality Impact Assessment (EqIA) it was noted that there remains a proportion of people who cannot or will not move to digital, highlighting the importance of being able to access tickets in person at the station. Though under GA's original proposals not all tickets would be available at every station, we welcome GA's new commitment to make sure it is possible for passengers to buy the same full range of rail products at all its stations. This would be done through the combination of transactions via the existing fleet of TVMs (whether entirely self-serve or with the help of nearby station hosts, who GA assure us will have appropriate training) and via the ticket office retail machines, which are currently used in the ticket office and which GA have confirmed will in future be available for staff to use to sell tickets not available on TVMs.

We note there are also plans to improve TVM functionality. While this in theory should improve the retail experience for passengers, we understand these updates are not expected to be completed until at least mid-2024 if not later on that year. Additionally we appreciate this is dependent on funding agreements which are yet to be approved. We would like to see these improvements secured before the closure of ticket offices at GA stations.

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. GA have helpfully provided us with their analysis of TVM retail capacity, looking at 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. Using this analysis GA have confirmed additional TVMs will be installed at Bishop's Stortford,

Broxbourne, Cheshunt, Harlow Town and Shenfield to increase retail capacity as needed.

This now presents a positive picture of TVMs' ability to absorb extra sales, particularly at stations where ticket office sales are low. If assumptions about channel switching are not correct though there remain questions if 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. GA has said it will "use reasonable endeavours to ensure we minimise queuing times at ticket machines" 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 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 GA'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. GA plans state that sufficient staffing levels will be in place to ensure customers receive the same service as they do today. We also note the opportunity for Station Hosts to provide more assistance by being able to move about the station, and mobile staffing teams to provide extra support at stations outside of current staffing hours, or where they are not staffed at all.

We understand that GA have committed to retain the ability to pay by cash at every station, which will protect the unbanked and other digitally excluded passengers.



TVM improvements and increased field engineers are also planned, which would increase reliability and functionality of these machines. However, there are currently no confirmed timings for this, and again it is dependent on funding negotiations and deals.

GA have outlined plans for a central focal point for passengers who want to speak to a member of staff when they arrive at the station, which we understand is likely to be located near TVMs. 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 and the ability to easily find a member of staff.

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 11th 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.

Safety

We welcome the discussions which GA 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.



GA 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 TF. As that survey was paused in 2020 due to Covid, 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 GA 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 GA'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. GA have not been able to share any figures due to the confidential nature of commercially sensitive information, but have suggested that through making staff more accessible to passengers and continued improvement to services it can encourage more people to use the railway on a more regular basis.

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 analysis of GA's proposals, London TravelWatch object to the proposals put forward by GA based on the following reasons:

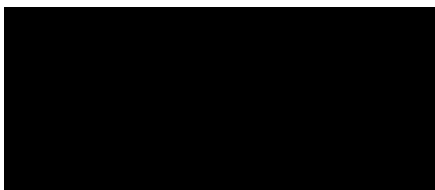


- we are unable to conclude that the proposals would result in an overall improvement in quality of service:
 - we are particularly concerned that the reduced staffing hours at Sawbridgeworth, and the reduced staff levels at Cheshunt, Hertford East, Waltham Cross and Ware, could result in a worsening in quality of service
- 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
- 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
- GA, 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 GA would still like to proceed with these proposals, in order for us to withdraw our objection we would require these issues to be fully addressed. Alternatively, GA 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

A list of objections and petitions by station

Station	Number of Objections	Number of Petitions and Signatures
BISHOPS STORTFORD	612	
BRIMSDOWN	3	
BROXBOURNE	334	
CHESHUNT	163	1 petition with 470 signatures
ENFIELD LOCK	38	
HARLOW MILL	24	
HARLOW TOWN	273	3 petitions with a total of 2635 signatures
HERTFORD EAST	92	1 petition with 275 signatures
RYE HOUSE	13	
SAWBRIDGEWORTH	90	
SHENFIELD	81	
ST MARGARETS HERTS	25	
TOTTENHAM HALE	41	
WALTHAM CROSS	106	1 petition with 196 signatures
WARE	140	1 petition with 474 signatures

Please note London TravelWatch also received 24 objections for Stansted Airport and 143 for London Liverpool Street, but these are not being consulted on under the Major Changes process.

