

31st October 2023

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South Western Railway (SWR)
(sent via e-mail)

Dear ██████████

South Western Railway (SWR) proposals to close ticket offices under the Major Change Process of the Ticketing & Settlement Agreement (TSA)

I am writing to you following ██████████ letter of 5th July to London TravelWatch, setting out plans to close all ticket offices at stations where SWR is the lead retailer, as part of a wider programme of industry reform.

The proposed changes relate to 67 SWR stations which 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 and your letter of 27th September in response to our letter of 6th September (attached in Annex 1 and 2 respectively), and other supporting documents. We are grateful to you and your colleagues for the time taken to respond 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 SWR 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. 17,485 of these responses were specific to SWR. We have now processed these responses and included a summary of the resulting analysis in this letter.

Summary of the proposed changes

We understand that the main changes being proposed by SWR (which in some respects changed substantially from the initial proposals) are as follows:

- closure of all 67 SWR ticket offices in the London TravelWatch area
- existing staffing days and hours remaining unchanged
- the current ticket office role will be replaced by a new multi-skilled Front of House role, which includes ticket retailing
- 54 stations will see no change to current ticket retailing staffing hours, overall staffing levels or ticket retailing capability

- 13 stations which have more than one ticket office window will see no change to current overall staffing hours or ticket retailing capability but there will be reductions to ticket retailing staffing levels
- for the products and services currently bought through ticket offices that are not available through digital means or TVMs, the current ticket retailing capability at all stations will be maintained to help passengers buy tickets until suitable alternative means are introduced
- following SWR's analysis of TVM demand at their stations, six stations will have an increased number of TVMs and 12 stations will have fewer TVMs
- station facilities would remain open as they are today.

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:

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.

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

SWR received 17,485 responses specific to them. Of these, 17,448 were objecting to the proposals. Objections were received for all the stations SWR put forward proposals for. 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 penalized.



- **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 SWR’s proposals in principle might benefit passengers. Redeploying staff potentially allows them to provide a more personal service, to a larger number of people at the station than the declining proportion of passengers who visit a ticket office, whilst at the same time making more effective use of their time and skills. This in turn could allow the railways to run more efficiently and so improve their financial sustainability.

The key question for us is whether the evidence that has been provided is robust enough to show that the benefits to passengers mark an improvement on the current system and will be evident from day one of the proposals being 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 at SWR's stations.

SWR state that the proposals will provide more face-to-face support to customers and offer customer service that aligns with what customers want and need. As part of this, we are pleased that all SWR station staff will be trained to support customers with a competency called "retail appreciation." This will mean that staff in this new role will understand the ticket types available and be able to support customers in purchasing the cheapest and most applicable fare. In particular, the new Front of House role will assist with retailing and ticketing advice, as well provide customer information and assistance, and accessibility support.

We are pleased that SWR have revised their proposals so that 54 of their 67 stations will no longer see any reduction to their current staffing levels, current staffing hours or the ticket retailing capability at each of these stations.

However, we are concerned when looking at the proposals for the 13 stations which have more than one ticket office window, which include some very high ticket sales. These stations are Clapham Junction, Egham, London Waterloo, Putney, Richmond, Staines, Surbiton (Main), Twickenham, Vauxhall, Walton on Thames, Weybridge, Wimbledon and Woking. Significant reductions in retailing capacity have been proposed at these stations. For instance, at London Waterloo, across the week, there would be a reduction in ticket retailing staff of between 87% and 91% compared to currently. Other stations such as Clapham Junction, Richmond and Wimbledon would also see particularly significant reductions. SWR have not provided a clear justification to explain these reductions.

Our observations on the proposed staffing levels for those 13 stations mean that we do not believe that the proposals would result in an improvement in quality of service, and so we must object to the plans to close them.

Linked to this, and looking to the future, we are concerned that 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 are no longer ticket offices at SWR's stations.

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 SWR can determine alone but until it is in place we object to the proposals to close the ticket offices at SWR stations.

Access to products

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

SWR helpfully provided data on the ways in which tickets were sold across their network from 2nd April to 20th May 2023, to provide context for the proposals. In this period ticket office sales accounted for 9%, compared to 22% on TVMs and 36% online. And 75% of SWR passenger journeys are already made using smart media, such as contactless, Oyster or SWR Touch Smartcards.

Nonetheless, we know that many passengers rely on the ticketing expertise of staff and/or may be unable or do not wish to use smart media. Given this, we welcome SWR's decision to revise its original proposals so that it would in future still be possible for passengers to buy the same full range of rail tickets and products at all its stations with a ticket office as today. This includes the 1% of products and services currently bought through ticket offices that are not available through digital means or TVMs.

We support SWR's approach that staff members will be proactive and serve the customer in the way that best meets the customer needs. This includes a recognition that not all customers have access to digital methods, some are unbanked and others may be unable to use TVMs. Staff may therefore decide, for example, to signpost to digital options, discuss the benefits of Smart Cards or assist with purchases on TVMs.

Crucially, staff will also be able to retail from a handheld tablet, which will sell every ticket available in a ticket office, and which will connect to a printer on the customer side of the ticket office window. SWR have committed that staff will be expected to use their tablet to queue-bust should there be queues at TVM. It is also helpful that the tablet will accept cash payments and issue cash refunds, if required.

We note that SWR have undertaken an assessment of the number and types of tickets issued and the number of TVMs at every station. SWR have also committed to buying additional TVMs when needed. Based on the detailed data which SWR have provided to us, we are satisfied that there is sufficient capacity in the existing TVMs to cope with future demand at each station. As a result of their analysis, SWR will move some underused machines to stations that are forecasted to have higher demand. So, in the London TravelWatch area 12 stations will see a reduction in the number of TVMs, whilst six stations will benefit from additional TVMs.

It is positive that SWR will be procuring an upgrade to their TVMs which will allow passengers to plan their journey, obtain real time train running information and purchase more tickets including Advance, Rovers and Rangers. We believe this will further improve the customer experience.

However, we have a concern related to the objective of encouraging further migration of sales to online channels. National Rail Enquiries and train operators



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 SWR’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.

SWR state that their accessibility support will be better with their proposals because, unlike at present, all station staff would be able to support passengers with accessibility needs, such as guiding a visually impaired passenger to the platform and assisting them to board the train. We note that SWR will continue to provide Turn Up and Go assistance through its Assisted Boarding Points, available at every SWR managed platform. We also note that in the latest ORR survey of experiences of Passenger Assist (July 2023), SWR passengers were more likely than the overall sample to state they weren’t met or did not receive the Passenger Assist service they booked.

We are aware that train operators have proposed an industry-wide concept of Welcome Points at stations as a constructive response to concerns about the potential impact of ticket office closures on accessibility. It is positive that SWR are exploring the option to bring in Welcome Points but at this stage there are no details on what such a Welcome Point will look like including timings and confirmation of funding.

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, all 67 of SWR's TVMs in the London TravelWatch area accept cash and this will be maintained. Should the TVM(s) in a station not be accepting cash, and customers have no alternative means to pay, they will be permitted to board the train and buy on board or at their destination, as is the current process.

SWR publicly provided an overarching Equality Impact Assessment (EqIA) during the consultation period. This gave useful information about the impacts of the proposals on passengers and SWR's evolving thoughts and actions around mitigations. Unfortunately, SWR did not provide station specific EqIAs which would have allowed us to undertake an assessment of the impacts of the proposals on a station-by-station basis, especially the safety and security issues, and any proposed mitigations. We believe that station specific EqIAs are completed and provided to London TravelWatch before any decisions are approved.

Safety

We are pleased to see that a programme is underway by SWR to replace its entire CCTV system to provide enhanced coverage across the network, with the current live viewing of CCTV footage at some stations to become footage of all locations from control.

We welcome SWR's ongoing dialogue with a variety of stakeholders including the British Transport Police (BTP) to maintain staff and passenger security through any changes to station staffing. We note the intention to complete a Crime and Vulnerability Risk Assessment (produced by the Department of Transport in collaboration with the BTP) reflecting the change proposals. Our view is that it 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.

SWR has explained that they currently have a variety of metrics that measure quality of service, which will continue to be monitored. These include customer satisfaction measures, with specific metrics for ease of purchasing a ticket and perceptions of safety and security. These metrics are reported to the DfT as part of SWR's operating contract.



In terms of accessibility, SWR report passenger assistance statistics each period to the ORR and conduct Accessibility Mystery Shopping periodically and take key learns from this feedback to improve customer experience.

We also note that the Rail Delivery Group (RDG) has said that, to ensure an impartial baseline and that 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 SWR 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 which 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 SWR's view that the proposals will deliver an improvement in at least one 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. SWE believe that their strategic approach - moving towards greater use of digital ticket purchasing options while still retaining a solution for 'walk-up' passengers who rely on traditional retail methods at the station - represents better value for money.

SWR have advised that their proposal is supported by a business case that has been reviewed and assessed by the DfT, who have had to be satisfied of both the cost effectiveness of the specific proposals and that the proposals include cost savings from the reorganisation of staff at stations. SWR also expect the overall changes to revenue to be minimal.

While we understand that some of the specific details of the business case may be commercially confidential, 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 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 SWR based on the following reasons:

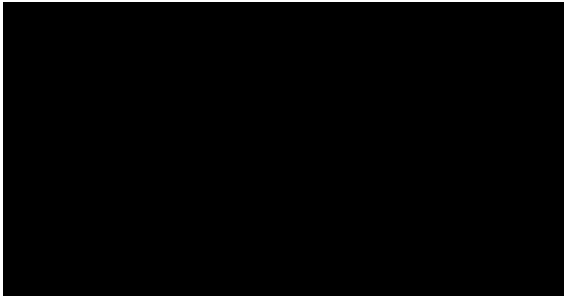
- we believe that the planned staff reductions at 13 stations do not represent an improvement in quality of service. These stations are:
 - Clapham Junction
 - Egham
 - London Waterloo
 - Putney
 - Richmond
 - Staines
 - Surbiton (Main)
 - Twickenham
 - Vauxhall
 - Walton on Thames
 - Weybridge
 - Wimbledon
 - Woking
- 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
- the continued mis-representation of London fares on National Rail Enquiries and TOC websites has not yet been properly resolved
- SWR, 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 individual station EqlAs also need to be completed and any identified mitigations implemented
- 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 SWR 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, SWR 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 SWR station

Station	Objections
Addlestone	7
Ashford Surrey	83
Barnes	26
Berrylands	1
Bookham	45
Brentford	8
Byfleet & New Haw	5
Chertsey	10
Chessington North	3
Chessington South	4
Chiswick	14
Clandon	63
Clapham Junction	79
Claygate	12
Cobham & Stoke D'abernon	47
Datchet	62
Earlsfield	29
Effingham Junction	7
Egham	47
Esher	34
Ewell West	29
Feltham	40
Fulwell	7
Hampton	61
Hampton Court	24
Hampton Wick	16
Hersham	16
Hinchley Wood	19
Horsley	86
Hounslow	12
Kingston	48
London Road Guildford	19
London Waterloo	207
Malden Manor	6
Mortlake	162
Motspur Park	8
New Malden	37
Norbiton	30
North Sheen	5
Oxshott	25
Putney	84
Raynes Park	37
Richmond	243

Station	Objections
Shepperton	20
St Margarets (Greater London)	22
Staines	75
Stoneleigh	59
Strawberry Hill	23
Sunbury	13
Surbiton (Main)	156
Teddington	81
Thames Ditton	12
Tolworth	5
Twickenham	94
Upper Halliford	1
Vauxhall	17
Virginia Water	41
Walton On Thames	128
Wandsworth Town	10
West Byfleet	46
Weybridge	60
Whitton	31
Wimbledon	155
Windsor & Eton Riverside	22
Woking	113
Worcester Park	94
Worplesdon	2

