

31st October 2023

████████████████████
c2c
(sent via e-mail)

Dear ████████████████████

c2c Proposals to close ticket offices under the Major Change Process of the Ticketing & Settlement Agreement (TSA)

I am writing to you following c2c's letter of 5th July to London TravelWatch, setting out plans to close ticket offices at 8 stations and make changes at 2 stations where c2c is the lead retailer, as part of a wider programme of industry reform.

Proposed changes relating to 10 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 27th 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 c2c 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. 9,570 of these responses were specific to c2c. We have now processed these responses and included a summary of the resulting analysis in this letter.

Summary of the proposed changes

We understand the main changes being proposed by c2c regarding the 10 stations in our remit as follows:

- closure of ticket offices at 8 stations and retention of ticket offices at 2 stations (Fenchurch Street and Grays)
- continued and more visible passenger access at stations to a staff member, fully trained in train fares (Floorwalkers), through redeployment of ticket office staff
- some changes in the staffing hours and numbers of Floorwalkers compared with today's ticket office staff and in the hours when there is some staff presence at stations

- a commitment (confirmed in your letter to us of 27th September) to increase the number of Floorwalker hours at 6 of the stations originally proposed, to ensure that no currently staffed station would become unstaffed
- promotion of digital and self-service retail channels, instead of using ticket offices, to pay for rail travel: this includes the forthcoming deployment of contactless (CPAY)/Pay As You Go (PAYG) ticketing on c2c stations and continued use of ticket vending machines (TVMs) at stations. You have also recently committed to keeping a ticket office machine at each station until mitigations are in place to allow for the retailing at stations of railcards, national concessions for disabled people, refunds, replacements for faulty season tickets, changing bookings bought from a TVM and Rovers/Rangers.
- a commitment (confirmed in your letter to us of 27th September) to provide a central “Welcome Point” at stations, in response to our concerns about the impact of the original proposals on Disabled passengers in particular.

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>
 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.

c2c received 9,570 responses specific to their stations. Of these 9,554 were objecting to the proposals. Objections were received for all 10 of the stations c2c 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 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 c2c'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 6 factors.

Quality of service

Our focus under this category is on the potential impact of staffing hours and staffing levels: we note your statement that there will be no changes to the opening times of the facilities at your stations.

While the original 5th July proposals lead with the financial rationale for change, they also indicate that redeploying staff currently located in ticket offices would make staff more visible and accessible to customers. That would enable better service by giving staff more time to focus on resolving customer problems, maintaining the station environment and assisting customers who need the most help.

We note the following about the updated proposals:

- compared with today's ticket office hours, 5 of the 10 stations in our remit will have more Floorwalker hours per week: Dagenham Dock (+12%), Fenchurch Street (+13%), Ockendon (+9%), Purfleet (+14%) and Rainham (+14%)
- 1 station would have the same Floorwalker hours per week as today's ticket office staff (Limehouse) and 4 would have fewer Floorwalker hours: Barking (-16%), Chafford Hundred (-37%), Grays (-9%) and Upminster (-13%)
- at all 10 of the stations, a staff presence of some sort would exist, either when Floorwalkers are on duty or beyond those hours, where ticket barrier staff, platform staff security guards and other contractors are also deployed
- under the original proposals, all 10 stations would see reduced staffing levels of between 5% and 50%², with 5 of those stations due to see a reduction of around 20% (Chafford Hundred, Grays, Fenchurch Street, Limehouse and Upminster)
- the capabilities of today's ticket office staff roles already include 16 other duties aside from selling tickets and helping with TVMs, such as Floorwalking to help customers³. All 16 of these duties are shared with other roles (gateline, mobile, dispatch) which exist today and which would continue under the proposals.

In principle, the increase in Floorwalker hours under the proposals for 5 stations, compared with current ticket office hours, is a positive development for passengers which we would support. However:

² figures based on comparing ticket office staff + gateline, mobile and dispatch full time equivalents (FTEs) today, with proposals for Floorwalkers, gateline, mobile and dispatch staff FTEs (*c2c TSA Major Change workbook - "Proposal Information"*)

³ "retailing full range of tickets, assisting with ticket vending machines, provide train running information, carry out security checks where relevant, comply with station procedures/guidelines, automatic ticket gate operation, provide customer service, light litter picking/cleaning, winterisation duties, daily/weekly fire panel tests, accident reporting, fault reporting, ensure contractors and visitors sign in and out, undertake floorwalking duties to assist customers, assist mobility impaired persons, undertake manual PA announcements where needed, assist with ill/injured passengers, work in accordance with cash handling regulations" (*ibid*)

- on the basis of the information we have received, it is difficult to understand how far in practice this represents an improvement in customer service capability, given the wide range of duties which ticket office staff and others already have
- while we understand that c2c's intention to migrate more sales to self-serve channels could release time spent today by staff at the station selling tickets, which they can devote in future to their wider duties, it is difficult to understand how far that might happen in practice. The proposed scale of reduction in staffing levels could counteract the benefit of increased Floorwalker hours, to leave a net neutral or even negative impact on overall staff visibility and availability.

These uncertainties about the impact of the proposals on quality of service are only underlined in the 4 stations where a cut in Floorwalker hours compared with today's ticket office hours is being put forward. While we recognise that the reduced hours better align with current levels of sales activity, it is not evident that either they or the maintained number of Floorwalker hours at Limehouse represent an improvement in quality of service.

We also observe that for the stations in our remit, in terms of proposed Floorwalker hours, nearly twice as many passengers will potentially experience lower quality of service (ie fewer hours) than those who will potentially benefit from increased hours: the combined annual footfalls at these stations respectively is c.19.5 million and c.10.3 million. Taken together with the above considerations, we are unable to conclude that the proposals for the 10 c2c stations in our remit would result in an improvement in quality of service.

We are also unable to make a judgement on staffing levels, as we have not been provided updated staffing numbers for each station. We do note though that under the original proposals, all 10 stations would see reduced staffing levels of between 5% and 50%⁴, with 5 of those stations due to see a reduction of around 20% (Chafford Hundred, Grays, Fenchurch Street, Limehouse and Upminster). Using this as a guide, we are particularly concerned about the impact this would have on passengers at the busiest stations, most notably Fenchurch Street and Grays.

We are also 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 c2c stations in London TravelWatch's area.

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.

⁴ figures based on comparing ticket office staff + gateline, mobile and dispatch full time equivalents (FTEs) today, with proposals for Floorwalkers, gateline, mobile and dispatch staff FTEs (*c2c TSA Major Change workbook - "Proposal Information"*)

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 c2c can determine alone, but until it is in place we object to the proposals to close the ticket offices at c2c stations in London TravelWatch's area.

Access to products

Our focus here is on how far c2c's proposed combination of TVM capacity/capability, staff support at the station and migration to other sales channels would ensure continued widespread and easy access to the purchase of rail products.

We recognise the shift in recent years among c2c customers to self-serve channels, from 45% to 65% of transactions, and the scope for further shift to an estimated 80%, particularly given the planned extension of CPAY and the use of barcode ticketing on c2c's network. These developments bring benefits in terms of convenience to passengers and lower costs-to-serve.

However, in terms of your proposals, we have a number of areas of concern which we feel need to be addressed before we can endorse the approach:

- under the original proposals at the 8 c2c stations in our area where ticket offices would be closed, passengers would only be able to buy certain rail products (such as longer season tickets or some Railcards) online or by travelling to one of the proposed Customer Information Centres (CICs).

We note that some of the proposed mitigations in terms of maintaining product availability at stations involve upgrading TVM functionality, for example, to provide refunds, enable a change in booking and to sell Ranger or Rover tickets. We welcome these commitments but note they are not due to complete until some point in 2024, and that although DfT has agreed funding in principle with the industry, it is subject to certain conditions. These TVM upgrades need to be in place before we can agree to the proposals going ahead.

c2c have also since confirmed to us they have updated their proposals so these 8 stations would become Temporary Customer Information Centres, so passengers can continue to access these services in station until mitigations are in place. While this is a welcome development, the process, which would require customers who need these products to contact a Floorwalker at the station and request assistance, as noted by c2c, may take longer to complete compared to using a ticket office, particularly during peak hours. Additionally, this option will be limited to railcards, national concessions for disabled people, Rovers/Rangers (non-localised), refunds, replacements and changes.

We think the full range of rail products should continue to be available at all staffed stations, in this case by providing Floorwalkers on a continued basis with handheld devices or access to ticket office machines, in the way proposed by



other train operators.

- we note the comment in your 27th September letter that there is work across the industry to develop a policy and an effective approach to enabling passengers to travel without a ticket and not to have to go out of their way to buy a ticket. This includes clarification of travel in Compulsory Ticket Areas (CTAs) and interim policy guidance/training about the National Rail Conditions of Travel (NRCOT) regarding Penalty Fares. We have yet to be consulted on these proposals, which would need to be properly thought-through and implemented before the proposed ticket office closures could go ahead
- we note that you carry out TVM capacity reviews with your supply chain and that you expect reliance on TVMs as a retail channel to decrease following the introduction of barcode and CPAY tickets. Your Major Change workbook suggests that the proposals anticipate removing one of the TVMs at the stations in our area (at Fenchurch Street), and that, while you will use reasonable endeavours to keep queueing within industry standards, there may be longer queues in the immediate period following implementation, particularly at larger stations. Your planned mitigation for this transitional impact is to use Revenue Protection staff to help customers: we would welcome further detail on how this is intended to work.

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 c2c’s proposed changes.

Accessibility

We note the intention for Turn Up and Go (TUAG) assistance and pre-booked Passenger Assistance for customers with disabilities will remain the same, through a combination of station staff, mobile security teams, staff from neighbouring stations and help points. However, we are concerned that at stations where staffing hours are reduced TUAG is at risk of not being satisfactorily delivered, as there will be staff at the station for fewer hours to directly help passengers. While we recognise the use of mobile teams, c2c itself recognises that there may be occasions where it is determined that “nobody is available to assist” and so a taxi to the next staffed



station will be used instead. Even if this is “unlikely”, it would represent a worsening of service for passengers who use TUAG.

As we set out in our interim letter to c2c, many respondents to the consultation have expressed concern about how they will be able to find redeployed staff at stations, should the proposals to close ticket offices go ahead. We welcome the industry’s response to these concerns with the development of the Welcome Points concept, to which you refer in your 27th September letter.

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 TVMs, we welcome the work being done to relocate outdoor TVMs whose accessibility and useability might currently be negatively affected by weather (though it is unclear whether this is relevant to any of the stations in our area and when the work will be complete).

However, we are unclear whether c2c has done any assessment of the accessibility of its TVMs other than to establish with your supplier the height from the ground of the “touch requiring parts” of the machines. It is encouraging to hear that you “are working with our suppliers to ensure that TVMs are as accessible as reasonably possible”, but we would need further detail about potential mitigations and timings to provide us with comfort that a comprehensive approach is being taken forward.

We note that every c2c station offers at least one TVM which accepts cash payments and it is encouraging to learn that you are working with your suppliers on the feasibility of upgrading card-only TVMs so they can also accept cash. We note and endorse your view that there is likely to be enough TVM capacity to handle future cash transactions at stations given the current volumes of such transactions at stations and the scope for channel shift in future. However, it is unclear how passengers will receive cash refunds unless at a CIC.



Safety

We welcome the regular engagement which c2c has with the British Transport Police (BTP) about safety and security trends on your network. We also recognise that the proposed redeployment of ticket staff could in principle increase the visibility of staff at your stations, and thus deliver benefit in terms of perceived safety/security. However, we have also questioned above how far in practice such benefits might be realised, given the scale of reductions in staff levels being proposed.

We note the intention to complete a Crime and Vulnerability Risk Assessment (CVRA, produced by the Department of Transport in collaboration with the BTP) of your proposed ticket office closures. Our view is that that should be done and any mitigations identified as necessary implemented before we can approve the proposals.

In carrying out the CVRA, we would draw your attention to the proposals for staff resourcing at 3 of the 10 stations in our area which potentially could be in tension with the security challenges experienced at those locations. We note the following from the information provided in the safety and accessibility tab of c2c's Major Change workbook:

- the entry for Grays includes: "High crime location, first to last staffing is partly effective, but there remains high public order, violence and staff assault issues." Yet the proposals envisage an 18% cut in FTEs providing a staff presence and no security FTEs are highlighted in current or proposed staff deployment
- the entry for Chafford Hundred includes: "A staff assault hotspot. Lakeside is a high crime location, with a recent murder.....There is only one platform at Chafford Hundred, which causes customer confusion. The high proportion of leisure users who are not familiar with the network requires a more proactive hands-on staffing approach. It is in the Top 5 for crime and anti-social behaviour. This combination requires a strong staff presence throughout the day and night." The proposals do include an increase in security FTEs, but as part of an overall 27% cut in FTEs providing a staff presence at the station
- the entry for Barking includes: "First to last c2c staffing has helped mitigate the wider social and crime problems experienced in the local area an especially deprived locality, associated with alienation, radicalisation and terrorism." Yet the proposals envisage a 9% cut in FTEs providing staff presence and deployment of fewer security FTEs.

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.



c2c have noted that they will evaluate their retail proposition through internal review including through its Service Quality Regime, customer insight channels, customer satisfaction surveys and external survey work. They have also noted there is still work to be done in this area, committing to reviewing the monitoring and metrics required to support any changes if the proposals are accepted.

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, 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 c2c 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 c2c'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. In response to our request for details to demonstrate the cost effectiveness of your proposals, c2c have referred us to an RDG statement which among other things says a business case has been reviewed by the DfT and that specific details of the business case are commercially confidential.

We understand that some of the information may be sensitive, but we find it extraordinary 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 c2c based on the following reasons:

- we are unable to conclude that the proposals would result in an overall improvement in quality of service. We have particular concerns about the impact on service of:
 - the reduction in Floorwalker hours at Barking, Chafford Hundred, Grays and Upminster stations
 - the reduction in staff levels at stations. As final proposed staffing numbers for each station have not been provided we are unable to make a definitive judgement on staffing levels, but we are particularly concerned about the impact this would have on passengers at the busiest stations, including Fenchurch Street and Grays.
- 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 current range of products available at stations will be harder to access at stations under these proposals, as not all tickets are available on TVMs and the process for buying these through a retained ticket office machine appears to be more onerous. Additionally the commitment to retaining these machines is only temporary until other mitigations are in place, but these are still in development and so we are unable to judge if they will be satisfactory
- clarification on CTAs and updated Penalty Fare guidance has not been consulted on and implemented. Due to the likelihood of more passengers having to travel without a ticket (as they will not all be available at stations under these proposals), this must be in place before any changes
- improvements to TVMs, while welcome, are still in development and contingent on funding. These must be in place before any ticket offices can be closed
- the continued mis-representation of London rail fares on National Rail Enquiries and TOC websites has not yet been properly resolved
- c2c, 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

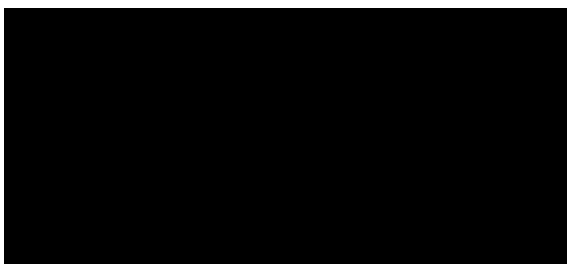


- we cannot with confidence judge whether the proposals would represent an improvement on current arrangements in terms of cost effectiveness.

If c2c 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, c2c 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 by station

Station	Number of Objections
Barking	59
Chafford Hundred	13
Dagenham Dock	4
Grays	16
Limehouse	13
London Fenchurch Street	42
Ockendon	14
Purfleet	2
Rainham Essex	37
Upminster	170

