

14th August 2026
[redacted]

Chiltern Railways
(sent via e-mail)

Dear [redacted],

Chiltern Railways proposal to not re-introduce the ticket office at Northolt Park station under the Major Change Process of the Ticketing & Settlement Agreement (TSA)

I am writing in response to Chiltern's proposal submitted to London TravelWatch to not re-introduce the ticket office at Northolt Park station. Chiltern have advised that the ticket office, which had been open on weekdays only, had been housed in a portacabin style building which was closed in 2014 due to its dilapidated state. The structure was then removed from the station in 2024 as the building was deemed to be unsafe.

Chiltern's proposal is admittedly an unusual one in that has been submitted 12 years after the ticket office closed. We are greatly concerned that Chiltern did not follow the correct Major Change Process in 2014. We expect that any future applications submitted by Chiltern under that Process will be made whilst the relevant ticket office(s) remain open and thus avoid a repeat of this unsatisfactory situation.

We have been analysing the information provided to us as part of the TSA process, including the Major Change Workbook spreadsheet and other supporting documents. We are grateful to you and your colleagues for the time taken to respond to our queries throughout the process, which have also helped inform our decision.

Public response to the changes

As you know, we have also conducted a public consultation on your proposals. This consultation period lasted for three weeks and closed on 7th August. During that time London TravelWatch did not receive any representations from individuals or stakeholders.

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 (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 Chiltern's proposal is to not re-introduce the ticket office at Northolt Park station, which was last in operation in 2014. The current customer service provision, including ways to purchase tickets and gain assistance, will remain as currently.

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 pre-closure position and/or that there will be an improvement in cost effectiveness.

We have carefully analysed Chiltern's proposals, alongside the lack of response from the public, and we have come to the following views on the aforementioned six factors.

Quality of service

When considering proposals under the Major Change Process, our focus in this category is usually on the potential impact of the proposal to staffing hours and staffing levels. However, Chiltern have confirmed that Northolt Park has been unstaffed since 2014 following the closure of the ticket office at that time.

We understand that it is proposed for the station to continue to be unstaffed. The exceptions to this are the following:

- * Assistance – Station staff are redeployed from Marylebone to provide Passenger Assistance (see further details in the Accessibility section, below).
- * Litter clearance and recycling – The station receives one hour's cleaning per weekday.
- * Routine station audits – These are carried out by Marylebone's Customer Experience Management team.
- * Revenue protection – The Revenue Protection team visit Northolt Park on an ad-hoc cyclical basis, with deployment rostered.
- * Cold weather procedures – An external contractor will continue to be used for gritting. If assistance is required after the station has been gritted, staff will be sent from Marylebone to assist.

In usual circumstances, train companies submitting a proposal under the Major Change Process would submit a lost hours report for the station affected. This would cover the same period as that for which the ticket office sales data is provided, to show the number of hours when the ticket office was not staffed against its stated opening hours. However, it is of course now far too late to supply that information.

In terms of other facilities at Northolt Park, there are no toilets, lifts or waiting rooms. There are, though, waiting shelters on each platform, with the shelter on the London-bound platform larger than the waiting room was in the former ticket office. There are also Help Points on each platform which can be used to provide general assistance or report emergencies.

As the waiting shelters and Help Points do not require staff to be present for them to be used, they remain accessible under the closure of the ticket office. However, the Help Point is even more important given that is how some passengers will need to access information and support in the absence of a staffed ticket office.

Chiltern have noted that these are checked periodically as part of their station hazard checks and Service Quality regimes, with independent inspectors tasked with inspecting if the Help Point is out of operation, faulty or has poor reception; is answered within 30 seconds; and if it is inaudible and/or unclear. Faults are required to be fixed within 48 hours under the SLA, though Chiltern also note that

the Help Points are in good working order due to recent wiring improvements at the station.

Access to products

Our focus in this category is on how far Chiltern's proposal would ensure continued widespread and easy access to the purchase of rail products.

Chiltern say that there is already a high level of easy access for the purchase of tickets through a range of channels. Off site, this includes their own- and third-party websites. There is also a ticket vending machine at Northolt Park which will continue to be available to purchase tickets or collect those purchased online.

However, reviewing the most recent ticket sales data provided for the ticket office, we note that it shows that 86% of transactions will still be available through alternatives. That leaves 14% of transactions that would no longer be available to purchase at the station. Given the age of the data (from 2012) we understand that many of the tickets this covers are now purchased in much lower quantities (such as season tickets up to 90 days) or no longer exist (such as a family travelcard). Therefore, the percentage is now likely to be lower than 14%.

We also note that some tickets are not available on the ticket machines but instead are available to purchase through the Revenue Protection team. If a passenger has been unable to purchase such a ticket from Northolt Park, they will not be issued with a penalty fare, as this will have been their first available opportunity to do so.

Chiltern say that since it became possible to pay for journeys by Oyster/PAYG (Pay as You Go), most journeys made from Northolt Park have been made that way. Chiltern provided data showing that in 2023/24 the use of Oyster/PAYG accounted for 87 per cent of journeys at Northolt Park.

We have, though, identified a concern related to encouraging further migration of sales to online channels. When we searched for tickets for a single, off-peak journey from Northolt Park to Marylebone, we saw that Chiltern's website does not mention that PAYG is available for that journey. Instead, Chiltern only offer an Anytime Day Single, which, at £8.50, is more than twice the cost of the £3.80 PAYG fare. Incidentally, the £3.80 PAYG fare is clearly highlighted on the National Rail Enquiries website when a search was made for the same journey.

Chiltern's submission for this proposal says that Oyster/PAYG is so popular 'because it is the cheapest way of making a journey into London and represents the best customer offering.' However, when purchasing tickets on its own website, Chiltern's customers are not being made aware of 'the best customer offering.' In the spirit of fairness to passengers, we therefore call on Chiltern to do the right thing and fix this issue as a matter of urgency.

As it currently is, encouraging more people to buy tickets online risks directing more passengers to more expensive fares than they need to pay. London TravelWatch

has previously raised this concern with the Rail Delivery Group (RDG), but despite some encouraging signals, this has not yet been addressed uniformly across industry. This is something which we will continue to press the industry on.

Accessibility

Our focus in this category is on the potential impact of this proposal on passengers who have particular needs when boarding/alighting trains or buying tickets.

Chiltern have confirmed that this proposal does not require a change to their Accessible Travel Policies.

Chiltern have explained that there has been no negative impact on their ability to provide mobility assistance to customers since the closure of the ticket office. For instances of booked passenger assistance, station staff are redeployed from Marylebone. Whilst for passengers who have not pre-booked their journey, Chiltern say that the passenger can arrange assistance through use of the customer Help Points on each platform.

Chiltern said there were 113 instances of Passenger Assist at Northolt Park between 2021 and 2024. We also note that in the latest ORR survey of experiences of Passenger Assist (July 2026), passengers using Chiltern gave some of the highest levels of satisfaction with assistance received at stations.¹

Chiltern have confirmed that since the closure of the ticket office, they 'have not had any complaints suggesting that they have been unable to meet the expectations of people with restricted mobility and/or requiring assistance.'

Chiltern's Equality & Diversity Impact Assessment identifies that 'some older customers...may prefer to use cash to purchase tickets' but go on to say that the use of Oyster/Contactless payments suggests 'that those that fall within this characteristic are familiar with this option.' Whilst this may be the case for many passengers, for those who wish to pay by cash, Chiltern have also confirmed that the TVM at Northolt Park (which is available from first to last train) 'only takes card payments.'

Chiltern told us that they'd be open to exploring replacing the current TVM with one that can take cash and card (at an estimated cost of £30,000) if they received that demand through customer feedback. However, they advised that they haven't received any customer feedback that they have been unable to purchase a ticket at Northolt Park due to there not being a cash facility.

Passengers who are 'unbanked' will be provided with the opportunity to purchase a ticket using cash by the aforementioned Revenue Protection team or from a staffed ticket office.

From a check of Chiltern's website, it does not appear that Chiltern offer the option to buy tickets directly from them over the phone.

Safety

Our focus in this category is understanding and considering what is currently provided at Northolt Park, what is proposed and how it will be monitored.

Chiltern advised that since the closure of the ticket office, there have not been any reported safety issues or concerns, nor any general customer complaints through their Customer Relations team.

Chiltern explained that the current provision at Northolt Park - remote CCTV monitoring, Help Points and the deployment of Travel Safe Officers (TSOs) - would remain the same in future. The TSOs are deployed largely based upon intelligence, such as a report of crime or antisocial behaviour but they are also tasked with providing a presence at each Chiltern station. Since introducing this concept in April 2025, Chiltern said there have been 192 visits to Northolt Park, but no incidents reported by the team.

Chiltern added that through their periodic visits to the station, the Marylebone Customer Experience Management team have not reported any crime or antisocial behaviour incidents.

Future monitoring

Our focus in this category is on the importance of having clarity about the arrangements to monitor the implementation of the proposal. Having a clear set of agreed, publicly reported yardsticks on quality of service will allow Chiltern to show how well their proposal is working and helps passengers to hold them to account.

Chiltern have advised that the monitoring which has taken place at Northolt Park since the ticket office closed will continue in future. This monitoring has included ticketless travel surveys, TSOs deployed across the Chiltern route, monitoring of accessibility commitments, customer feedback and complaints, and periodic site audits. The location is also subject to Chiltern's Service Quality Regime, which measures Chiltern's performance against a set of quality standards at their stations, on their trains and from their staff.

Cost effectiveness

Our focus in this final category is to understand and consider whether the proposal will increase cost effectiveness.

Chiltern has explained that there was low use of the ticket office when it was open and have provided sales data from an uninterrupted six-week period in autumn 2012. At that time, across the weekday 6.75 hours shift at which the ticket office was open, there was an average of 4.7 ticket sales per hour (equivalent to 32 ticket sales per day).

It should be noted that because the data which Chiltern provided is so old, it is another reason why this application should have been submitted in 2014.

Chiltern has advised that since 2012 there has been an increased use of Oyster/PAYG at Northolt Park. Chiltern said that, on average, only 10-20 tickets sold per day in 2023/24 had Northolt Park as their origin and were not made using Oyster/PAYG, with this number including journeys made with season tickets. Chiltern have also noted that Contactless payments can now be made for journeys as far as Princes Risborough/Aylesbury, which would also contribute to less usage of a ticket office.

We asked Chiltern what the costs would be of re-opening and running the ticket office but they said they were unable to provide a fair indicative cost. As the structure is no longer present, any costings would be subject to appropriate surveys before the completion of a full tender evaluation. They explained that without the surveys, they cannot fairly provide detail on any associated building cost. Consideration would also have to be made for additional costs (such as staffing, utilities, property and facilities). They expect this to be a significant figure which would not justify the retailing proposition given the low utilisation of retailing when the ticket office was previously open.

Decision and next steps

Given the above assessment, London TravelWatch does not object to the proposals put forward by Chiltern based on the following reasons:

- * The range of facilities and assistance currently available to passengers, in the absence of fixed station staff, will either largely remain the same in future or be available via other means (e.g. by using the Help Points).
- * Passengers will still be able to access the range of ticket products including the use of Oyster/PAYG. Passengers unable to buy their tickets on the ticket machines will still be able to buy them through the Revenue Protection team without being issued with a penalty fare.
- * Passengers will still be able to access mobility assistance, whether pre-booked or Turn Up And Go. Passengers who wish to buy a ticket using cash will be able to do so from the Revenue Protection team or from a staffed ticket office.
- * The current approach of addressing safety, including remote CCTV monitoring and the deployment of Travel Safe Officers, will continue. We have noted that since the closure of the ticket office there have not been any reported safety issues or concerns, either by passengers or Chiltern staff.
- * The range of monitoring activities which has taken place at the station since the ticket office closed will continue in future.
- * Although Chiltern did not provide an indicative cost of re-opening and running the ticket office, it was expected to be a significant figure which would not be justified given the low ticket sales when the ticket office was last open, with sales reducing further in recent years.

In our assessment we have particularly noted that since fixed staff have been removed from the station there have been no objections from the public (and no record of complaints following change) about issues such as safety and the provision of assistance. While there seem to be limited (if any) benefits to passengers of closing the ticket office, passengers have not reported concerns following the closure. Therefore, the change would still represent an improvement on current arrangements in terms of cost effectiveness, given the high costs of reintroducing the ticket office, so meeting the criteria under the TSA.

However, we also call on Chiltern to do the following to further assist passengers using Northolt Park:

- * Explore installing a totem interactive information board for passengers to use
- * Ensure there is clear signage so that passengers know, where appropriate/needed, they can buy on board from revenue protection and ensure that all members of the Revenue Protection Team are clearly briefed on this option.
- * Ongoing monitoring of the station and commitment to implement further mitigations if needed.
- * Updating Chiltern's website to clearly show that payment by contactless is an option, especially when the contactless price is cheaper than Chiltern's own fares. Making this change will, of course, not just benefit passengers using Northolt Park but those who use any of Chiltern's stations where paying by contactless is an option.

We look forward to speaking with Chiltern in due course about their progress with these aspects

In conclusion, we would like to reiterate that the long delay before this proposal was submitted has made this an unsatisfactory situation in general, and we trust that it will not be repeated for any future proposals under the Major Change Process.

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

[redacted]

London TravelWatch

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London TravelWatch is the operating name of the London Transport Users' Committee.