

Transport East consultation response

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Subject: Ticket office closures
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Overview

Consultation response to the proposals from the train operators within the Transport East region to change the management of most rail station ticket offices.

Under the Ticketing and Settlement Agreement train operators are required to consult Transport Focus and provide passengers with the opportunity to have their say. As part of the consultation Transport Focus wants to hear views to understand how the changes will impact users.

These views are in addition to any made by Local Transport Authorities within the Transport East area.

Transport East response to consultation

1. Context

Transport East is the sub-national transport body for Norfolk, Suffolk, Essex, Southend-on-Sea and Thurrock. We have a remit to develop and own a regional Transport Strategy and a pipeline of investment priorities. Passenger rail connections and services are crucial to the ambitions with our Transport Strategy, particularly decarbonisation to net-zero, connecting growing towns and cities, and energising rural and coastal communities. We work closely with the rail industry, including TOCs in our region and National Rail to influence policies, programmes and decisions.

In the Transport East region, we have three TOCs operating; Greater Anglia, C2C and Thameslink.

To make train travel attractive it is essential that train services are accessible, convenient, easy to use and competitive in terms of cost and journey time with other modes of transport. We also recognise the need to balance those customer service objectives with managing costs.

2. Issues with the consultation

The consultation does not include;

- an assessment of the impact on passengers, especially those with specific travel needs,
- an analysis of the impact on either short or long-term demand for rail travel,
- an analysis of cost savings and impacts on income generation.

We were pleased to see the industry respond to the complaints about the original consultation length and extend the deadline for responses. However, this approach should have been adopted initially to allow as many people to engage as possible. Point E of the Cabinet office consultation guidelines (2018) sets out guidance for how long consultations should be and while they do not give a minimum period they state: “Consulting too quickly will not give enough time for consideration and will reduce the quality of responses.”

3. Transport East’s comments on the proposals

We are concerned that the proposals to close most ticket offices in the region will make train travel more difficult for many passengers, especially those less familiar with the railway network and those with additional needs, and so discourage train use. We have set out more detailed comments about specific areas of the proposals. These are high-level and thematic given Transport East’s area covers three train operating companies.

a) Ticketing options and purchase mechanisms

As a principle, it should be as easy as possible to buy the best value correct ticket for your journey. With the move to online and ticket machine purchasing, we have the following points:

- The current ticket and fares structure far too complex, with too many ticket options. The “Future of Britain's railways: Williams-Shapps Plan for Rail” recommended simplification of the fares and ticketing system. This simplification of the fares and ticket system should be prioritised.
- Simplifying the ticket system first could significantly simplify the ticket machine and online experience and make this a realistic option for many more passengers.
- Current ticket machines are complex with little standardisation across the rail network making them difficult to use, especially for people who cannot easily see or understand the information provided. Greater simplicity and standardisation are necessary before the industry becomes dependent upon ticket machines.
- Ticket vending machines need to be at a level which is accessible to people using a wheelchair.
- Ticket machines will need to be consistently and reliably available, or alternative on-train ticketing available.
- Not all stations have a good mobile signal on all networks. The train operator should ensure that all passengers with access to an electronic device can access the internet free of charge (we note parallel proposals from the rail industry to remove access to free Wi-Fi from passengers).
- Online services and apps can be difficult to navigate with confusion about the type of ticket the customer needs. While often highlighting the cheapest option, these can be the less flexible tickets. The online ticketing sites and machines also rely on the customer already understanding the type of ticket they need for their journey and the industry descriptor for that ticket.

- Not all ticket types are currently available via ticket machines and apps and we ask that before implementing ticket office changes, that **all** tickets are made available online or through the ticket machines.
- TfL is also consulting on the removal of Travelcards it is unclear what ticket options will be available to replace these to provide value for money for those travelling into London occasionally.
- The rail industry will need to be more accommodating of people who have no ticket or the wrong ticket. A fine should not be the automatic consequence of failure to understand or operate a complex ticket machine and fare structure. The onus should be shifted to the rail industry to prove guilt, rather than passenger to prove innocence. A passenger who has made reasonable attempts to buy the correct ticket should not be fined.

b) Availability of advice

Customers should be able to secure advice and support for ticketing purchases as easily as they can now.

- Flexible staff who can sell tickets, respond to queries, and provide general assistance to passengers are welcome, but this approach is of limited value if it is only available for a further restricted portion of the day. The proposal not only includes the closure of almost all ticket offices in the East, but also proposes a significant reduction in the time when staff will be available in many locations.
- The proposed focus of customer retail support is in the AM for many stations, often starting early in the morning. In our understanding, people travelling at AM peaks are likely to be regular users who are confident in their travel behaviour and ticket choices. What is the evidence behind the proposed staffed hours? We would suggest that staffing most stations for the same hours but starting later in the day and finishing later would better suit those with ticketing advice needs.
- Even where ticket offices are retained there appears to be a very limited staff presence during the evenings.
- Station staff in public areas must have access to a tablet / smart phone that enable detailed journey planning. The complexity of the ticket system especially for multi-operator journeys, means that this is important.
- Consideration needs to be given to locations with high visitor numbers and tourist destinations. The East has many popular holiday destinations, and we are working with visitor bodies to promote sustainable travel. These customers are more likely to need ticketing assistance, especially during off-peak hours and at weekends. In the development of the mobile assistance crews, consideration for schedules and capacity should include additional hours in popular destination stations at key times including bank holidays, school holidays and major planned events such as festivals.
- The proposals for Greater Anglia's Customer Information Centres are welcome, but we note within the Eastern region we cover that there is a gap in provision of CICs in the west, with the CICs being located along the GEML, Cambridge and Stansted airport. Stansted station is

difficult to access from the East by rail, and services to Cambridge are less frequent from the East. We ask that operators within the East jointly assess the coverage of their CIC proposals to ensure equitable ease of access to a centre.

- C2C are retaining ticket offices at Fenchurch Street, Basildon, Benfleet, Grays and Southend Central, with generally similar hours to current. This is a better spread of provision along their network.
- Greater Anglia is committing to a 24-hr contact centre based in Norwich and available through the assistance button on the machine. We have concerns about speed of response from the contact centres when the assistance button is pressed. We are also unaware of any similar commitment from C2C for 24hr support, clearly this is a significant omission in the C2C proposals. All ticket machines must have a 24 hour support button so that passengers can press for assistance. The information button must be clear and there must be quick response times to deal with the passenger's queries.

c) A safe and accessible network

Travelling by train should be safe and accessible to all. The availability of visible staff to assist with multiple customer needs is welcome, but we are concerned that the proposal appears to include significantly reduced staff presence at stations in addition to the closure of almost all ticket offices.

We understand that EQIAs have been undertaken for each station and provided to Transport Focus. We ask that the quality and consistency of these are reviewed carefully by Transport Focus to ensure any location serving larger communities with protected characteristics are not adversely affected.

- We are concerned that reduction of staffed hours could result in reduced care for those who need additional assistance to use the railway, and the perception of unstaffed stations will put off some people from adopting train travel due to safety concerns or uncertainty.
- We seek reassurance that decisions about staffing levels have been informed by discussions with and incident data from the British Transport Police.
- Consideration needs to be given to passenger requirements during periods of disruption.
- We also seek commitments that these changes to staffing arrangements will not reduce access to key station facilities, particularly toilets and waiting rooms.
- We are concerned that staff located in public areas, especially if working alone, will be more vulnerable to abuse or assault. This is even more likely to occur if they are a woman, visibly from the LGBTQ+ community or of a different racial heritage and increased again if someone has multiple protected characteristics. We seek reassurances that clear steps will be taken to reduce the likelihood of increased abuse towards staff because of these proposals.
- Those living in remote areas, with minor stations, are likely to be the least well served, restricting their access to travel.
- We note the East has an older and aging population, which results in a population who may need continued support and advice for ticketing. While digital skills are now commonplace

for older people, the increased likelihood of cognitive impairments as people age will affect their ability to navigate ticketing machines and digital points of sale.

- Additional customer communications will be needed throughout the development of these proposals to increase understanding of ticketing options, how to use ticket machines and online purchases etc. We suggest TOCs look at 'how to' videos, and peer to peer voluntary support potentially through the Community Rail Partnerships and station adopters, travel buddy schemes and other best practice to mitigate the impact of these changes on disabled and otherwise disadvantaged communities.

d) Future use of ticket offices

We are keen to see the future use of the disused ticket offices enhance onward sustainable journey options, reduce the need to travel and improve community services especially at smaller more rurally located stations to support the concept of 'village clusters'. Ideas include secure bike and e-bike parking, charging and servicing; mobility hubs supporting Demand Responsive Transport and EV charging infrastructure; joint services hubs (i.e. council, police, NHS, banking, post-office); co-working spaces; community space including cafes and art space; visitor information; retail that enhances local provisions. There are already some good examples of this space being used in the way in the East for example Campsea Ashe station and Beccles, both in Suffolk which both host cafes and community spaces.