

North East Joint Transport Committee

By email:

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Dear Transport Focus

Response from North East Joint Transport Committee to Transport Focus in relation to rail ticket office closure consultation

I write in relation to the station ticket office consultation, to provide feedback on behalf of the North East Joint Transport Committee (NEJTC), that co-ordinates policy on behalf of the two Combined Authorities in North East England, namely the North of Tyne Combined Authority and the North East Combined Authority.

To summarise our feedback to the consultation:

- The NEJTC **objects to the proposed closure of ticket offices at Alnmouth, Berwick-Upon-Tweed, Durham, Hexham, Morpeth and Sunderland**. This is on the grounds that some ticket types will no longer be capable of being retailed at those stations, and it will not be possible to pay in cash. This will have a detrimental impact on rail passengers. Further, in the case of Hexham, Morpeth and Sunderland, staffing provision will be reduced with a detrimental impact on customer service, disabled access and provision of disabled toilets.
- The NEJTC considers that **the process of consultation is unfair to passengers and stakeholders** by being opaque, complex to engage with, unduly short, and inadequate information has been provided particularly in relation to Equality Impact Assessments.

We note that Transport for the North will be providing consultation comments in relation to the two train operators in which it has a specific interest – Northern Trains and TransPennine Trains. The Urban Transport Group will also be providing comments on behalf of its member city region authorities which include our region. We fully support the feedback of both bodies.

In addition, many of our individual councils will be responding directly to the consultation, and we support and endorse the comments made. Northumberland County Council, Durham County Council and Sunderland City Council are particularly negatively impacted by the proposals.

I would urge you to take the serious concerns set out below, and those of our constituent authorities, into account when providing feedback to the train operators and to the Secretary of State for Transport, and object to any closures to ticket offices until they have been addressed.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Martin Gannon', written in a cursive style.

Cllr Martin Gannon
Leader of Gateshead Council and Chair of the North East Joint Transport Committee

cc Northern Trains, LNER and Secretary of State for Transport

Response from the North East Joint Transport Committee to rail industry proposals to close station ticket offices

About the North East

1. The North East is a large area with over two million residents covering an extensive geography that includes some of the most rural parts of the country. Our Transport Plan is subtitled “moving to a green, healthy, dynamic and thriving North East”, and in it we articulate how we want local people to make healthy, sustainable travel choices. That includes greater use of our public transport network, in which we are investing heavily.
2. Rail is very important to the communities of the North East, although its coverage is limited. Nevertheless, there are large distances between our towns and cities, and indeed between our region and other parts of the United Kingdom, and this means that rail is the only realistic form of public transport available to some communities. For people who do not own a car or who choose not to drive, this makes rail links essential for travel to education, work, medical appointments, and leisure.
3. In this context proposed closures of rail ticket offices are incongruous and run counter to what we are trying to achieve. We need to make rail services more attractive, more inclusive and more accessible. We are concerned that the proposals set out in the current consultation appear to be sacrificing service quality for financial reasons, and in doing so risk making rail services less attractive, inclusive and accessible.
4. In the Tyne and Wear urban area the vast majority of rail-based links are provided by the Tyne and Wear Metro. The Metro is a highly accessible public transport system that carries over 35 million passengers each year. Relevant to this consultation, the Metro does not have station ticket offices or conductors on trains; all ticket sales are made via station Ticket Vending Machines (TVMs), online, or by a Pay-As-You-Go smartcard called “Pop”. All Metro platforms are fully accessible via ramps and lifts, and level boarding is a standard design feature which is about to be further improved by a new fleet of trains which feature a retractable accessible step.
5. Our experience of changing passenger retailing on the Metro, having closed our own network of retailing outlets two years ago, makes us confident that changes to the rail ticket retailing environment are possible and can be effective at improving customer service. However, it also demonstrates how important it is to make sure that customer needs, especially those of disabled or vulnerable passengers, are properly considered and provided for in advance of any proposed change being made.

Approach to consultation

6. The approach taken to this consultation is at best confusing and opaque. This is reinforced by the consultation being carried out by multiple individual train operators when in fact it is an industry-wide proposal. Furthermore a 21-day consultation period for such a large-scale and high impact set of proposals is wholly inadequate. Even more so because of the complex nature of the consultation as already described.
7. We believe it is all but impossible to expect the members of the public who will be most impacted by these proposals to be able to get a full sense of what is proposed:
 - a. How is a member of the public expected to know which train operator is Station Facilities Operator for the stations that they use most regularly?
 - b. How are disabled users expected to find and decipher the information that tells them the actual impact on them as a user of their local station?
8. We do not consider that this consultation is being conducted in a manner that is fair to station users or reasonable, and we believe that the people who are most likely to be impacted by the change (disabled, older and vulnerable people) are least likely to be able to engage meaningfully with the consultation. We note that the consultation materials are not advertised as being in an accessible format for those passengers who have visual impairments or other requirements. We feel that people with disabilities are one of the passenger groups most likely to benefit from a local ticket office, and who will therefore be most impacted by the proposed closures. This needs to be rectified.
9. We believe that the consultation is unfair in four ways:
 - a. lack of transparency of process;
 - b. highly complex, hard to access, and sometimes inaccurate consultation materials;
 - c. different customer propositions proposed by different operators; and
 - d. an absence of Equality Impact Assessments during consultation.

Lack of transparency of process

10. The consultation proposals have been published by individual train operators, and yet consultation feedback is to be provided directly to Transport Focus. What process then follows is not entirely clear, but it would appear that Transport Focus is expected to pass feedback on to train operators, but also to make objections where appropriate to the Secretary of State following a statutory process. It is wholly unclear how the views of rail users or stakeholders can influence the proposals.

Highly complex, hard to access, and sometimes inaccurate consultation material

11. Each train operator is consulting separately over the proposals relating to stations for which they are the Station Facilities Operator (SFO). Very few people are likely to know who the Station Facilities Operators are for the stations that they use, particularly as these are often different between the origin and destination station.
12. Our team of professional transport planners has found it very difficult to work through large quantities of consultation materials and supporting information, some of it in spreadsheets, produced by different train operators in completely different formats. One train operator has provided us with a “ZIP” file containing multiple files (but no index, by way of random example one file containing details of proposals at 9 stations is called “Annex B TSA Major Change TOC Input SL8 2023 V1.1.xlsx”) that contains some analysis of impacts – we don’t believe this ZIP file has been provided to the wider public.
13. One operator has emailed several times during the consultation to provide further detailed information. Another operator has provided no analysis of impacts at all, it simply states on its website what the revised service offering will be.
14. On the subject of websites, we have noticed several discrepancies between the information provided in the consultation and operators’ websites. For example, Northern Trains’ consultation materials say that Morpeth is currently staffed from 0630-1240, whereas Northern’s website says it is 0630-1700. Under these circumstances it is hard to see how impacted passengers are expected to meaningfully engage with the consultation.

Different customer propositions proposed by different operators

15. The proposals made by the two relevant train operators in our region are quite different. LNER’s information has a link to the Rail Delivery Group (RDG) website that says: “These proposals are designed to move staff out of ticket offices and onto station platforms and concourses to support better, face-to-face interactions, with the potential to close ticket offices in a number of locations”. This appears to be the case in LNER’s proposal but much less so in that of Northern Trains.
16. Broadly speaking, LNER’s proposals are to replace ticket office staff with customer service staff on platforms with operating hours unchanged and therefore access to most station amenities preserved. Northern Trains on the other hand is proposing to reduce the hours of coverage of station staff significantly, and this gives rise to a number of issues as set out below.

17. In the North East there are a number of examples of nearby stations serving similar communities on the same line having different SFOs, for example Berwick-Upon-Tweed (LNER) and Morpeth (Northern Trains). As Morpeth has Northern Trains as its SFO it will see a reduction in staffing hours, whereas Berwick-Upon-Tweed with LNER will not. The onus here would be for local residents to effectively respond twice to the consultation in different ways which feels unnecessarily complex and time consuming.
18. This difference in proposed customer offering by different train operators is hard to understand, and makes responding to the consultation difficult. Given that Northern Trains and LNER are both part of the government-owned operator DOHL, and have been for some time, it is hard to understand why such different approaches to both consultation and the proposals themselves have been taken.

Absence of Equality Impact Assessments

19. Perhaps most importantly of all, we note that a number of train operators have not carried out Equality Impact Assessments (EqIA) at this stage. Northern Trains, which is reducing its hours of staff coverage at many stations, is asking members of the public to assess the impact on them in order for it to be able to complete their assessment. We believe that this is wholly unacceptable.
20. Notwithstanding our earlier comments about how difficult it is for disabled and vulnerable people to find the relevant information and engage with this consultation, Northern Trains should already have sufficient knowledge of its own stations and facilities, as well as the law relating to disabilities, in order to produce a draft EqIA at each station where it proposes to make a change. Only Northern Trains knows how it intends to mitigate such issues as access to platforms for people with reduced mobility, the use of touch-screen TVMs by people who are blind or have visual impairments, and the provision of accessible toilets. Passengers and user groups can then comment on the draft EqIA with all of the relevant information set out in front of them.

Comments applicable to both Northern Trains and LNER

21. We accept that passenger needs are changing when it comes to the retailing of tickets and welcome the principle that ticket office staff may be better deployed elsewhere on stations. However, we have a number of concerns over the way in which these changes are proposed to be implemented, that we believe will be detrimental to our passengers and local communities.

Concern that staffing may be further reduced through time

22. The proposed change in the staff role from working in ticket offices, which cannot be closed without due process being followed, to customer assistants working on platforms, gives rise to a concern that the role could be reduced or phased out in future. That would be detrimental to rail passengers and run counter to the RDG's claim that the proposals are "designed to move staff out of ticket offices and onto station platforms and concourses to support better, face-to-face interactions".
23. We would like to see some form of binding wording, potentially through a change in the prevailing legislation or in delivery contracts, which meant that future changes to staffing hours would require further consultation, including with the Local Transport Authority, and approval from the Secretary of State.

Lack of suitable alternatives for ticket types that cannot be sold at TVMs

24. It seems to us that the proposals are being made prematurely. Significant numbers of ticket types are not available either through TVMs or online retailing apps, and cash transactions (which are still important to some in society) will not be possible at most stations. We are informed that some work is being undertaken by the rail industry to make TVMs more accessible, to allow more products to be retailed through TVMs, and to increase retailing through third parties such as convenience stores. Until the rail industry has put these solutions in place it seems that ticket offices are the only solution.
25. Closing ticket offices before these solutions are in place will lead to people unnecessarily paying more for their tickets, and some people will not be able to pay at all. This is an unreasonable burden on local people, many of whom are feeling the impact of the cost of living crisis. Whilst we have no reason to doubt the overall figure of only 12% of ticket sales taking place at ticket offices (albeit with significant variations at each station and in different regions), it seems to us that the stated 12% of people who still buy tickets at ticket offices do so for a particular reason, rather than simply not wishing to use a TVM. That will include buying tickets that are not available at TVMs which include many types of discounted tickets; paying in cash; and receiving enhanced assistance or advice.

Lack of recognition of the wider role of ticket offices

26. Furthermore, ticket offices provide a much wider range of supportive services than simply selling tickets. Whether providing timetable and real-time departure information, local directions and visitor information, or simply reassurance and advice about the journey ahead, we believe that many millions of customer interactions each day are not captured by the 12% figure of ticket sales. Most stations are community assets as well as travel hubs,

whose appearance and facilities form part of the image and functionality of the villages, towns and cities that they are part of.

27. This is exemplified by the case of Sunderland where for decades the passenger concourse has been run-down, providing a very poor impression of the city to both residents and visitors alike. After many years of trying and failing to get the rail industry and government to resolve the problem, the City Council has invested £27 million of local funding (part of which is sourced from the Transforming Cities Fund) and as a result, a new concourse is now nearing completion. This revitalised station will soon offer attractive, modern and welcoming facilities which are integrated with the city centre and we expect it will be a great source of civic pride. At the heart of this anticipated development is a new station ticket office which is now threatened by this consultation.
28. Furthermore, several stations in the North East affected by these proposals, in particular Durham, Alnmouth, Hexham and Berwick-Upon-Tweed are gateways to major tourism and UNESCO World Heritage sites and deal with thousands of national and international visitors, many of whom will be seeking information about onward travel. Platform-based staff may be able to replace some of these functions when they are present, however the “roving” nature of their role means that they will be in high demand at times, and it seems highly probable that they will not be able to service all customers’ needs in the way that a ticket office would have done.
29. We note that one station in the North East, Newcastle, will retain its ticket office. It is suggested in the consultation that passengers who still require the services of a ticket office for discounted tickets can travel there. We do not understand how this can work in practice, given that the passenger will require a ticket to travel to the hub station in the first place – for which they will have to pay full price.

Specific comments on Northern Trains’ Consultation

Reduction in staffing hours at Northern’s stations

30. Northern Trains is proposing to reduce the hours its customer-facing staff are present at most stations in the North East, in addition to changing their role to “Journey Makers”. This runs contrary to the RDG’s statement which is about enhancing customers’ experience. The reasoning behind reduced hours of staff coverage is unclear, indeed there is no explanation given as to why certain stations are proposed to have certain levels of “Journey Maker” staffing at particular times:

	Alnmouth	Hexham	Morpeth	Sunderland
Weekday current	0640-1315	0715-1730	0630-1700*	0655-1800
Weekday proposed	0630-1300	0900-1230	0630-1200	0800-1500
Saturday current	0640-1315	0815-1415	0630-1300*	0655-1800
Saturday proposed	0630-1300	1000-1330	0630-1200	0800-1500
Sunday current	1040-2100	Closed	Closed	0900-1700
Sunday proposed	1100-2100	None	None	None

(*we note that in its consultation materials Northern Trains state that Morpeth ticket office is currently open on weekdays and Saturdays from 0630-1240, whereas Northern’s website [Morpeth Station | Trains to Morpeth & Times | Northern \(northernrailway.co.uk\)](http://Morpeth Station | Trains to Morpeth & Times | Northern (northernrailway.co.uk)) says it is open weekdays 0630-1700 and Saturdays 0630-1300).

31. In the absence of any other stated rationale and given that reduced staff coverage is unlikely to “enhance customers’ experience”, we assume that the reduction in the hours of staff coverage is a cost-saving measure. This is not mentioned in Northern Trains’ consultation materials and we believe that the operator’s passengers and stakeholders are owed a transparent explanation.
32. Additionally, no rationale has been given as to why some stations outside the North East will retain ticket offices (e.g. Hartlepool) when other, busier stations (e.g. Morpeth) are to lose them.
33. Northern Trains has not explained how certain amenities for disabled people, available today, will be provided when “Journey Makers” are unavailable – either because they are performing another function at the time, or because it is outside the hours that they are present. This includes access to accessible toilets, responding to “call-for-help” alarms, and support to cross to otherwise inaccessible platforms. Three of the stations operated by Northern Trains in our area are proposed to have the hours of customer-facing staffing reduced significantly; it is therefore likely that there will be widespread impacts that need to be examined and explained to the passengers that are affected.
34. This goes to the point that we make above in relation to Equality Impact Assessments. We would expect to see these set out, albeit in draft form, in a way that clearly shows how Northern Trains intends to mitigate issues such as access to platforms for people with reduced mobility, the use of touch-screen TVMs by people who are blind or have visual impairments, and the provision of accessible toilets. Passengers and user groups could then comment on the draft EqIA with all of the relevant information set out in front of them.

Whilst some information has been made available to us in spreadsheets, this is not in a form that is accessible to impacted users. Furthermore, based on this information it appears that there are no additional mitigations being proposed when the hours of reduced staffing means that a station is unstaffed when previously the ticket office staff would have been able to assist.

Morpeth and Alnmouth

35. Further to our comments made above on Morpeth, we note that for historic reasons the Station Facilities Operator at Morpeth and Alnmouth is Northern Trains, despite them being major stops on the East Coast Main Line served by numerous long-distance train operators. It is now highly anomalous that Morpeth will only have a visible staff presence for a short window each day (0630-1230) whereas other similar East Coast Main Line stations will have customer-facing staff available throughout the operating day.

Sunderland

36. As noted above, Sunderland City Council has invested £27 million of local funding (part of which is sourced from the Transforming Cities Fund) and as a result a new concourse is nearing completion offering attractive, modern and welcoming facilities which are integrated with the city centre and will be a source of civic pride. At the heart of the development is a new station ticket office which is now threatened by this consultation. We are not aware of any specific consultation with either Sunderland City Council, with ourselves in our role as the Local Transport Authority, nor with Nexus as the Passenger Transport Executive for Tyne and Wear.

Hexham

37. Hexham station's platforms are connected by a footbridge, and there is no lift. We understand that, where required, people with reduced mobility are assisted by ticket office staff to cross the live railway line using a foot crossing. Furthermore, Hexham has waiting rooms and accessible toilets. Northern Trains has not explained how any of these passenger amenities will be provided during the hours when "Journey Maker" staff are not scheduled to be available.

Objections

38. Given the comments we make above, we object to the proposed ticket offices closures affecting North East stations on the following grounds:

	Ticket choice reduced	Cash payment no longer possible	Staffing hours reduced	Disabled toilet amenity reduced	Concerns over disabled access	Visitor information reduced	Local investment not considered
Alnmouth	X	X					
Berwick	X	X					
Durham	X	X					
Hexham	X	X	X	X	X	X	
Morpeth	X	X	X	X	X	X	
Sunderland	X	X	X	X	X	X	X

39. I therefore request that you advise Northern Trains and LNER not to proceed with the proposals to close ticket offices at those stations, and notify the Secretary of State accordingly.

40. We also believe that the consultation itself is being conducted in such a way that it is very difficult for passengers to meaningfully engage with it, and the more impacted the user (e.g. because of a disability or other vulnerability), the less likely they are to be able to engage with the proposals and make their views heard.

41. I therefore request that you advise Northern Trains and LNER to suspend the current consultation until such time as they are able to provide clear, transparent and properly evidenced proposals in such a way that rail users and passengers can properly understand, engage and respond to them.