



Keith Prince AM
Chairman of the Transport Committee

Michael Roberts,
Chief Executive
London TravelWatch

Re: Consultation on Ticket Office Closures
(Sent by email)

8 August 2023

Dear Michael,

I am writing on behalf of the London Assembly's Transport Committee to share our views on the proposals announced by the Rail Delivery Group (RDG) on 5 July 2023 to close ticket offices at railway stations around the country. These proposals would mean the closure of more than 150 ticket offices in London,¹ as part of plans to 'move staff from ticket offices and on station platforms, concourses and ticket halls'.²

It is important that all stations are adequately and visibly staffed from the first to last train to support 'turn up and go' travel, and there should be ticket offices at key interchanges. Any reduction in overall levels of staff from stations would be a major concern given the concerns around accessibility, safety and security outlined below, and there are outstanding concerns about how removal of staffed ticket offices will impact the accessibility of the railways for disabled passengers.

At the Committee's meeting on Transport in Outer London on 13 July 2023, the Committee heard evidence from Madeleine Stewart from Transport for All about the importance of ticket offices

¹ Evening Standard [Revealed: Full list of London rail stations that could see ticket offices close](#) 7 July 2023

² Rail Delivery Group [Proposals to update the railway for how passengers use it today](#)

for enabling people to access the railway. She highlighted a range of concerns including that for many disabled people, ticket office staff are the first point of contact when arriving at a station and provide a recognised assistance point. For example, under current guide dog training, there is a command for the dog to find the ticket office in a station's main concourse, so that their handler can go to the ticket office and buy their ticket.³ Ticket offices are also the only designated point in the station with a hearing induction loop, and many deaf people may be unable to access assistance without this.⁴ This raises very serious questions as to what level of service must be maintained so that there is no negative impact on the accessibility of the railway.

A full Equality Impact Assessment (EQIA) should have been conducted before any proposals were considered along with pre-engagement with organisations representing deaf and disabled people. Many train companies have now produced and published EQIAs but some have been added or updated part-way through an initially very short consultation period.⁵ This should have been required by the Rail Delivery Group from Train Operators prior to the consultation beginning.

In addition, the information provided by rail companies on their proposed ticket office closures is presented in different ways, creating additional complexity and inconsistency, which is a further barrier to everyone understanding how these changes will impact them. There should be clear information in plain language for different groups affected by these changes such as disabled people, families, people without access to a bank card, people buying for group travel so that they and others who may be put at a disadvantage know what the likely impact is on them.

The proposals by the RDG highlight that 'an estimated 99 per cent of all transactions made at ticket offices last year can be made at Ticket Vending Machines (TVMs) or online'.⁶ However, the Committee heard that people with dexterity impairments are not able to push the buttons, and online options will not be possible without additional assistance for the 23 per cent of disabled people who do not use the internet.⁷ Madeleine Stewart described how ticket vending machines 'lack tactile information and functionality, which is essential for blind and visually impaired passengers, while many full height ticket machines are positioned out of reach for wheelchair users.' In addition, some tickets, such as the 50 per cent wheelchair user discount, can only be purchased at ticket offices.⁸

In March 2023, the Committee wrote to the Secretary of State regarding progress on taking forward the William-Shapps Plan for Rail. This recommended that 'the railway remains accessible so that any changes to ticket offices should not affect the ability of people to buy a ticket'. Several guests gave evidence to the Committee that an important factor is ensuring that there

³ Transcript of London Assembly Transport Committee meeting on Outer London - 13 July 2023

⁴ Transport for All [Objection template of issues from ticket office closures](#)

⁵ As of 25 July 2023, 8 of 11 London Train Operating Companies included had published an EQIA, with some saying it is a 'live document' and updating during the consultation. The others stated that it had been completed, but was not available on the website

⁶ Rail Delivery Group [Proposals to update the railway for how passengers use it today](#)

⁷ Transcript of London Assembly Transport Committee meeting on Outer London - 13 July 2023

⁸ Transport for All [Ticket Office closures: The issues](#)

continues to be staff on site at stations to assist passengers where needed. The Committee concluded that there should be improvements to ticket machines and stations should continue to be staffed.⁹

If changes to arrangements for assisting passengers in buying tickets do take place, it is important that the lessons from the closure of ticket offices on the London Underground are learnt.¹⁰ Firstly, it should be noted that the range of ticket options is far greater on the national rail system, and automatic price caps do not exist to automatically ensure that customers pay the right fare. Ticket offices are often the only place that passengers can go to get in-depth specialist advice about the cheapest ticket choices for their journey. Ticket offices also provide a reassuring presence on a station, and a place to go for help, which is particularly important for women travelling on their own or children.¹¹

Key lessons and recommendations from the review by London TravelWatch in 2016 of the closure of ticket offices on the London Underground included:

- Staff should be available and visible – their uniforms should be clearly distinguishable, and there should be an obvious focal point for passengers to go to.
- Assistance for passengers with disabilities should be consistently available, with hearing loops available and clearly signposted at every station.
- Staff presence is also vital for perceptions of safety and personal security.
- Ensuring that ticket machines are updated to sell a wider range of tickets, and that these are introduced before changes take place.¹²

One of the key lessons was that alternative arrangements need to be in place before changes are made. Given the particular concerns for disabled travellers and other groups who will be affected, it is vital that the challenges described above are resolved before any changes are made, and that staff continue to be available at stations in general.

Railways play an important role in London's transport system, particularly in many outer London areas, and it is vital that they remain attractive and accessible to all to encourage ridership and long-term sustainability.

In summary:

- The first step on these changes should have been to engage with affected groups, so that by the time of a consultation alternatives had been considered alongside the impact of

⁹ London Assembly Transport Committee, [Letter to Rt Hon Mark Harper MP on William-Shapps Plan for Rail](#) , 31 March 2023

¹⁰ London TravelWatch (2016) [Review of ticket office closures on the London Underground – the passenger perspective](#)

¹¹ London TravelWatch [Ticket office closures must not lead to less visible staff at stations say London TravelWatch 14 March 2022](#)

¹² London TravelWatch (2016) [Review of ticket office closures on the London Underground – the passenger perspective](#)

any changes. Equality Impact Assessments must now be provided as a matter of urgency, and in enough time before the consultation's new closing date to ensure those affected can read and respond in good time.

- Stations must remain accessible for all, and appropriately staffed, from first to last train, to provide assistance with tickets. Ticket offices must remain open at key interchanges.
- More work must be undertaken to ensure the specific needs of disabled people and other affected groups are met
- All tickets, along with any discounted tickets, that are currently available to buy from a ticket office must be available to buy from machines and machines must be fully accessible to disabled passengers with a full range of impairments.
- Consideration must be given to the impact of destaffing stations would have on the perception of safety and security on the railways, and how that would impact ridership.
- Lessons should be learned from the closure of TfL ticket offices. This includes ensuring visibility of staff and that alternative measures —accessible to all — are in place to prevent barriers to travel.
- If you are not able to get confirmation from rail companies that they will ensure that the above measures are taken, the proposals should not proceed.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Keith', with a stylized flourish at the end.

Keith Prince AM

Chairman of the Transport Committee