Ticket Office Closures Consultation Response

August 2023

****DRAFT FOR CONSIDERATION****

TRANSPORT FOR THE NORTH

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Transport for the North

Updated: 31st August 2023

1. Executive summary

1.1 Transport for the North (TfN) objects to the proposal to close ticket offices in our region on the basis that:

- The consultation process is flawed;
- The proposals will have a detrimental impact on the North, and will have a particularly adverse effect on more vulnerable groups; and
- The proposals do not have a strong business case and are therefore poor value for money.

1.2 We suggest an alternative way forward involving:

Addressing future retailing as part of a wider ticketing and stations reform programme in a way that works for the North. This would be undertaken in the context of integrating stations more fully with their local communities and making rail travel more attractive and accessible.

1.3 We accept that the way people buy tickets is changing, although the proportion of people using ticket offices in the North is higher than the national average, with about one-sixth of tickets purchased at ticket offices as compared to one-eighth nationally. This change should provide an opportunity to evolve the way tickets are sold and to develop the role of staff at stations. However, we are very clear that the availability of ticket offices is, for many people, much more than just about buying a ticket (for example providing information and assurance as well as enhancing safety and security).

1.4 Railways in the North have been particularly adversely impacted in recent years including, of course the Covid pandemic but also a range of North-specific issues; infrastructure failures, the fundamentally flawed 2018 timetable change, consistent performance failings driven by congested infrastructure; and the more recent driver training issues. If the North is to rebuild demand and drive mode shift to hit decarbonisation targets, we need to win back, attract, and retain, new customers. We have seen strong growth in leisure markets post-covid, and these are the very groups that most need the reassurance of staff and easy-to-use ticketing

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to make them repeat users, supporting our investment in rail, spending money on fares and taking congestion off the roads.

1.5 Lessons from Transport for London show that a properly designed evolution of ticketing would involve a substantial programme of planned reform to the core customer proposition and retail offering, within which changes to ticket offices would be the final element. A key element of improving ticketing is the roll out of Pay-As-You-Go ticketing (prevalent in London and the South East). To date progress on this has been slow, with so far the Government's only firm commitment being to a pilot as part of the Greater Manchester Trailblazer.

1.6 In terms of the wider modernisation of the customer offering at stations, TfN has been engaged on a "Stations as a Place" initiative for some time and we are confident such a programme would be the right way to evolve the customer offering – how tickets are purchased, and people use stations. Given this, TfN was surprised and concerned that a national consultation was launched on a country wide ticket office closure plan in isolation of any wider programme or the necessary pre-requisites.

1.7 We believe that the consultation process undertaken by the train operators was fundamentally flawed. There has been insufficient time (even with the extended deadline) to fully assess all the information provided separately by Train Operating Companies and there are major gaps and inconsistencies in the information provided. For example, basic ticket sales data has not been provided consistently for all operators. Operators (including Northen) have added several pieces of information during the consultation period (including the significant Equality Impact Assessments) which inevitably means the quality of responses has been limited. The inconsistency of formats and information makes it extremely challenging to consider the overall impact across the North.

1.8 From the information provided there are major inconsistencies across the North as operators have acted independently, in contrast to the principle of a 'guiding mind', joining up and simplifying the railway. For example, Crewe is a major existing hub for the North and will take on added importance when HS2 is delivered, but it is proposed it will lose its ticket office completely. Nantwich – just five miles from Crewe – will retain its ticket office as it's operated by Transport for Wales.

1.9 We have not seen the business case for the change. However, our assessment of the proposals as presented to Rail North Partnership is that they will have a detrimental impact on the North and are poor value for money. In particular our analysis – using the same recognised industry tools that TfN, the Department for Transport and Treasury utilise to assess rail programmes like this – suggests that when the adverse revenue impacts of loss of ticket offices are considered these will significantly offset the cost savings the operators are seeking to make in a matter of a few years, delivering poor value for money in the medium-to-long term.

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1.10 Our assessment is also that the proposals will have a disproportionate adverse impact on the North, as the significant reduction in staffing hours proposed by Northern (a 59% reduction) is in complete contrast to the national messaging about moving staff from behind the glass to help customers. In large parts of the North they will only be helping customers for very limited periods, and there will be a marked reduction in staffing on Sundays which is incompatible with the need to serve the growing leisure market. Making existing staff more accessible (and flexible to changing demand and special events) could have benefits for customers and staff alike, but this model is undermined by the level of reduction in staff hours actually proposed. Some train operators have meanwhile confirmed that their staff will not sell tickets on the platforms, so they are not a substitute for those lost from ticket offices.

1.11 Furthermore, our assessment is that there is a disproportionate impact on vulnerable groups who are more reliant on face-to-face contact to purchase tickets, particularly customers with a disability and those most impacted by transport-related social exclusion (who often pay with cash or vouchers). At the moment, approximately 75% of journeys across the North both start and end at a station with a ticket office, but this will drop to circa 20% with these proposals; this will impact vulnerable groups the hardest.

1.12 This concern is exacerbated by the late Equality Analysis (from Northern), coupled with the fact that there are a significant number of identified mitigations across all 131 stations where the ticket offices are proposed to close, but with no identified funding or confirmed programme for delivery. This means that they can't be relied upon as effective mitigations, as it's not confirmed that they will actually be implemented.

1.13 The North already suffers from a legacy of very poor accessibility at stations (for example 59% of Northern stations have ramps considered poor standard or do not provide step free access across the whole station) and this adds to the problem. For example, at Mossley station, there is step-free access from the station car park to the Manchester bound platform, but no step free access to the Huddersfield bound platform.

1.14 As stated above, we do recognise that the way people buy tickets is changing and, in some circumstances, there may be better ways of providing this service to customers other than via a ticket office. However, we don't accept the case has been made for the wholesale closures of ticket offices and staffing reductions ahead of any other elements of an integrated programme of retail and associated reform.

1.15 We have therefore published two policy position statements alongside this Ticket Office Consultation response setting out how we think ticket retailing and fares should evolve in the North of England. These statements are framed around identifying 'what good looks like' before

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any wholesale change to at station retail and set out the specific outcomes or tests against which proposals would be measured.

1.16 We would welcome a conversation with government to jointly develop an alternative programme of change and enhancement to the customer experience that reflects changing trends, protects vulnerable users, and contributes to a growing market for rail in the North.

1.17 We more than ever see the need to make the most of stations as community assets and drive greater integration with local places and communities including looking at new ownership and usage models.

2. The consultation process

2.1 TfN has consulted with our partners to request their views in relation to the consultation process itself, as well as the content of the proposals. Our partners gave a common view that the original consultation timescale and then short notice extension does not inspire confidence or trust that receiving, analysing, and making changes based upon consultation responses form a substantive part of this exercise by the Train Operating Companies (TOCs).

2.2 The consultation was viewed as ill-timed, given the significant lack of customer confidence in the rail system following the longstanding performance issues and regular short notice cancellations. It has also been initiated at a time where there should be a strong focus to restore confidence in rail services, looking to increase customer numbers and industry revenue.

2.3 Despite the regular strategic stakeholder engagement that TOCs undertake, the rail industry chose not to directly discuss the detailed proposals with TfN, Local Authorities or stakeholder forums, and hence stakeholders were not given the ability to input at an earlier stage of assessing and proposing alternative options to closure.

2.4 For any future proposals, TOCs will commit to meaningful dialogue with TfN and other transport authorities, in order to discuss plans on a case-by-case basis, as the current wholesale closure approach doesn't adequately consider local requirements.

2.5 The short timescales from when the proposals were initially anticipated to the closure of the consultation process also indicates that sufficient time may not have been allowed for truly robust Equality Impact Assessments.

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3. Analysis of the proposals

3.1 The key points to note, relating to the core Transport for the North area (and excluding the Merseyrail network) are:

- 156 out of our 183 existing ticket offices (over 85%) are planned for closure;
- Just 27 ticket offices would remain (including just 2 in the North East);
- One operator (Avanti West Coast) plans to close all its ticket offices, even at major stations; and
- Staffing hours will be considerably reduced overall (including a 59% reduction in staffed hours at Northern's stations).

3.2 TfN is surprised and concerned by the scale and inconsistency of the closures proposed. Critically, Northern are planning to close 131 of their current 149 ticket offices (circa 88%), leading to a situation where fewer than 4% of their stations will have ticket offices (as opposed to 32% at present).[1] Similarly, TransPennine Express intend to retain their existing ticket offices at Huddersfield and Manchester Airport only, whilst closing the other 14 that they currently operate. TransPennine Express also state in their consultation materials that they anticipate Manchester Airport and Huddersfield ticket offices will also close in the future, subject to a separate consultation, which they would expect to launch in Spring 2024 at the earliest.

3.3 Avanti West Coast meanwhile plan to close all 12 of the ticket offices which they currently operate in the North, leaving major centres such as Manchester Piccadilly and Stockport without a staffed ticket office.[2]

3.4 At present, there are 578 railway stations in the core TfN area (i.e. the North East, North West and Yorkshire and the Humber regions). Of these, 245 currently have a staffed ticket office; however, this includes 62 stations staffed by Merseyrail, which is not affected by this proposal. Of the 183 stations operated by other TOCs which currently have staffed ticket offices, 156 are planned for closure. In total, TfN has calculated that about 85% (almost 6 out of every 7) of present ticket offices in the North (excluding Merseyrail) will close, leaving just 27 of the current 183.

3.5 TfN also have an interest in a further 39 stations outside our core territory, either because Northern are the Station Facility Operator (20 stations), Northern's services call there (a further 11 stations), or they are geographically part of Sheffield City Region (14 stations). For this wider group of 617 stations, the data relating to ticket office closures (sorted by Station Facility Operator) are as follows:

[1] Northern Trains Limited, *Changes to NTL Ticket Retailing July 23,* July 2023, p. 2 https://www.northernrailway.co.uk/sites/default/files/2023-07/Retailing%20Summary%20Document.pdf

[2] Avanti West Coast, 'Proposed changes to ticket offices', July 2023 https://www.avantiwestcoast.co.uk/consultation

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Table 1: Proposed ticket office closures across TfN's overall area of interest (by Station Facility Operator)

Station Facility Operator	Status of ticket offices at stations				Journeys made to/from these stations (2021-22)				
	Ticket office to be retained	Ticket office to close	No ticket office	Total stations	Ticket office to be retained	Ticket office to close	No ticket office	All stations	Proportion from stations to lose ticket office
Avanti West Coast	0	12	0	12	0	20,224,694	0	20,224,694	100.0%
East Midlands Railway	3	3	25	31	13,909,246	1,640,310	955,620	16,505,176	9.9%
London North Eastern Railway	3	5	0	8	18,651,404	7,003,286	0	25,654,690	27.3%
London Northwestern Railway	0	2	1	3	0	330,012	30,838	360,850	91.5%
Merseyrail	62	0	4	66	58,166,886	0	716,264	58,883,150	0.0%
Network Rail	2	1	0	3	29,727,684	19,581,442	0	49,309,126	39.7%
Northern	17	131	317	465	25,204,190	38,390,886	23,610,220	87,205,296	44.0%
TfW Rail	2	0	7	9	3,563,380	0	453,750	4,017,130	0.0%
TransPennine Express	2	14	3	19	5,216,212	9,044,768	268,574	14,529,554	62.3%
Transport for Greater Manchester	1	0	0	1	390,384	0	0	390,384	0.0%
Total	92	168	357	617	154,829,386	96,215,398	26,035,266	277,080,050	34.7%
Total (excluding Merseyrail)	30	168	353	551	96,662,500	96,215,398	25,319,002	218,196,900	44.1%

3.6 We understand that some stations will initially remain staffed following the closures of ticket offices, but we are extremely concerned that the number of hours during which staff will be available to assist customers will be significantly reduced in most cases. For example, our analysis of the hours during which Northern's staffed stations will have staff present indicates that currently, 75% of these stations are staffed for at least 39 hours per week, whereas following implementation of the proposals, 75% of these stations will be staffed for 40 hours or less.[3] Overall, we have calculated that within the narrower definition of the North, Northern currently provide over 10,900 hours (per week) of ticket office staffing across 141 stations,[4] but this will fall to about 4,500 hours of staffing following the deployment of journey-makers (a reduction of over 59%).

[3] Northern Trains Limited, *Changing How We Support Customers at Our Stations: Public Consultation,* July 2023, pp. 14-32 https://www.northernrailway.co.uk/sites/default/files/2023-07/Public%20Consultation%20Document%20-%20V3.pdf

[4] This figure is different from the 140 stations indicated by Table 1 above, as it includes Leeds and Liverpool Lime Street (where Network Rail are the SFO and Northern maintain ticket offices) but excludes Whitby (where Northern are the SFO but North Yorkshire Moors Railway provide the ticket office).

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3.7 This is a very substantial detriment and in complete contrast to the national messaging about moving staff from out behind the ticket office windows to assist customers. It is clear that under these plans, customers in the North would be left substantially worse off compared to other parts of the country; for example, although Great Western are planning to eventually close all of their ticket offices, 78% of their stations will retain their current hours of staffed operation, as compared to fewer than 3% of Northern's stations.[5]

3.8 Examining Avanti West Coast's proposals reveals a similar pattern, with the following reductions in staffed hours during which ticketing support will be available at some of the North West's major stations:[6]

Table 2: Proposed changes to Avanti West Coast's hours of ticketing support (at their six busiest stations on the West Coast Main Line in the North)

Station	Current ticketing hours				Proposed ticketing hours			
	Day(s)	Start	Finish	Total	Start	Finish	Total	Change
Carlisle	Weekdays	05:00	20:00	15	06:00	20:00	14	-1
	Saturday	05:00	20:00	15	06:00	20:00	14	-1
	Sunday	09:00	20:00	11	08:30	18:00	9½	-1½
Crewe	Weekdays	05:30	20:00	14½	06:30	19:00	12½	-2
	Saturday	05:30	19:00	13½	06:30	19:00	12½	-1
	Sunday	08:10	19:00	10:50	07:00	19:00	12	+1:10
Lancaster	Weekdays	05:15	19:45	14½	07:30	16:15	8¾	-5¾
	Saturday	05:15	19:45	14½	07:30	16:15	8¾	-5¾
	Sunday	09:30	20:00	10½	09:00	17:00	8	-2½
Manchester Piccadilly	Weekdays	04:30	22:30	18	06:30	21:00	14½	-3½
	Saturday	04:30	22:30	18	06:30	21:00	14½	-3½
	Sunday	07:00	22:30	15½	07:30	21:00	13½	-2
Preston	Weekdays	05:45	22:00	16¼	06:00	20:00	14	-2¼
	Saturday	04:45	21:00	16¼	06:00	20:00	14	-2¼
	Sunday	08:00	22:00	14	09:30	18:30	9	-5
Stockport	Weekdays	05:10	20:30	15:20	06:30	19:00	12½	-2:50
	Saturday	06:30	19:30	13	06:30	19:00	12½	-½
	Sunday	08:00	19:30	11½	08:00	19:00	11	-½

3.9 Although these larger stations will continue to have staff present, the reduced hours for ticketing support is a concern. We especially note that the reduction in hours at weekends at some stations is misaligned with the change in demand patterns seen since the pandemic, which has seen the proportion of journeys made at weekends rise from circa 16% (in 2019) to approximately 21% (in 2022) of the total.

3.10 Another issue of concern is that under the current regulations, operators will not need to undertake the same level of formal consultation if they wish to subsequently change the hours at which on-platform staff are

[5] Blackburn, Hartlepool and Skipton are the only Northern stations where staffing hours will be maintained or increase.

[6] Avanti West Coast, 'Proposed changes to ticket offices', July 2023 https://www.avantiwestcoast.co.uk/consultation

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present. The consultation over ticket office closures may effectively be a final opportunity to voice any concerns prior to the establishment of a system whereby significant changes to the passenger experience can occur at short notice without further consultation.

4. Anomalies created by the proposals

4.1 A further issue with the ticket office closure proposal is that it has been developed separately by each TOC and has therefore generated a number of clear anomalies. There are many instances where some ticket offices are planned for closure whilst others nearby (at stations with lower footfall) will remain open. The examples cited below are not exhaustive. However, TfN believe that in a supposedly integrated railway network with a measure of centralised planning, the existence of such anomalies indicates a lack of overall strategy.

4.2 Perhaps the most obvious is that Manchester Piccadilly (the North's busiest station in 2021-22) would be left without a ticket office by Avanti West Coast's decision to close all of their facilities. This would occur at a time when plans are being developed for Manchester Piccadilly to become the major hub for HS2 in the city from the time that HS2 Phase 2a is completed. The 2nd through 9th busiest stations will all retain their ticket offices, with the next busiest station which is also losing its ticket office (Avanti West Coast's Preston) having less than a quarter of Manchester Piccadilly's footfall. The North's other two stations managed by Network Rail (Liverpool Lime Street and Leeds) will retain ticket offices operated by Merseyrail and Northern.

4.3 Railfuture's Yorkshire branch have noted that the whole historic county of Yorkshire (with a population of more than 5 million) will be left with only 8 station ticket offices operated by the mainline TOCs,[7] plus the ticket office at Whitby (operated by North Yorkshire Moors Railway). Conversely, Merseyrail will retain its 62 ticket offices, almost all of which are located in the former Metropolitan County of Merseyside (with a population less than 1½ million).

4.4 In the North East, Hartlepool will be retaining its Northern ticket office, but LNER will be closing their nearby ticket offices at the much busier mainline stations at Darlington and Durham.[8] In the same area, TPE plan to close their ticket office in the larger town of Middlesbrough, whilst the station at Sunderland is currently undergoing major renovations to a design which includes a ticket office which Northern now no longer need under the proposal to close it. Whitby and Hartlepool will thus be left as the only ticket offices in the whole area between York and Newcastle.

[7] Railfuture Yorkshire Branch, *Northern Ticket Office Consultation – Railfuture Yorkshire Response,* July 2023
[8] Urban Transport Group, *Ticket Office Closures: A UTG Position Paper,* 18th July 2023, p. 2

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4.5 Table 3 below shows the fate of all the current ticket offices in the North East region, with additional information on current ticket sales for those stations operated by Northern. It demonstrates that although there is a rationale behind the retention of Hartlepool, as it enjoys a high proportion of sales at the ticket office and using cash, it serves far fewer passengers than the stations at Darlington, Durham, and Middlesbrough, which will lose their ticket offices:

Table 3: The impact of the proposed changes on existing ticket offices in the North East

				Proportion of ticket sales (2023 Q2)				Payment at station		Weekly staffed hours	
Station	**Total journeys**	**Station Facility Operator**	**Ticket office status**	**Digital**	**On train**	**Ticket office**	**Ticket vending machine**	**Cash**	**Other (non-card)**	**Current**	**Proposed**
All Northern Trains Limited stations	87,205,296	Northern		65%	4%	16%	8%	18%	13%	10,921	4,502
Alnmouth	285,882	Northern	Closing	88%	0%	6%	1%	16%	2%	50	49
Hartlepool	529,630	Northern	Retained	74%	1%	16%	5%	33%	6%	64	83
Hexham	286,802	Northern	Closing	70%	2%	13%	11%	20%	2%	57	21
Morpeth	402,772	Northern	Closing	89%	1%	2%	2%	22%	4%	37	33
Redcar Central	343,542	Northern	Closing	77%	6%	8%	5%	29%	7%	42	20
Sunderland	385,822	Northern	Closing	78%	1%	9%	3%	24%	9%	75	39
Berwick-upon-Tweed	589,866	LNER	Closing								
Darlington	2,075,056	LNER	Closing								
Durham	2,092,432	LNER	Closing								
Middlesbrough	1,210,906	TransPennine Express	Closing								
Newcastle	7,040,072	LNER	Retained								
Thornaby	443,608	TransPennine Express	Closing								

4.6 TPE states that where a customer cannot purchase a product online or from a Ticket Vending Machine (TVM) at their TPE station, they will be able to purchase the product from another station that has a ticket office; for Hull customers this will be York (journey time of 1 hour 11 minutes for a direct service) or Doncaster (with the fastest journey time of 49 minutes) as all intermediate station ticket offices are proposed to close.

4.7 Similar anomalies are found across TfN's wider territory. For example, Northern are retaining a ticket office at Glossop, whilst Avanti West Coast are proposing to close theirs at nearby Stockport, which has almost 5 times the footfall. The graphs below illustrate how there will not be a high correlation between the footfall at stations and whether they retain a

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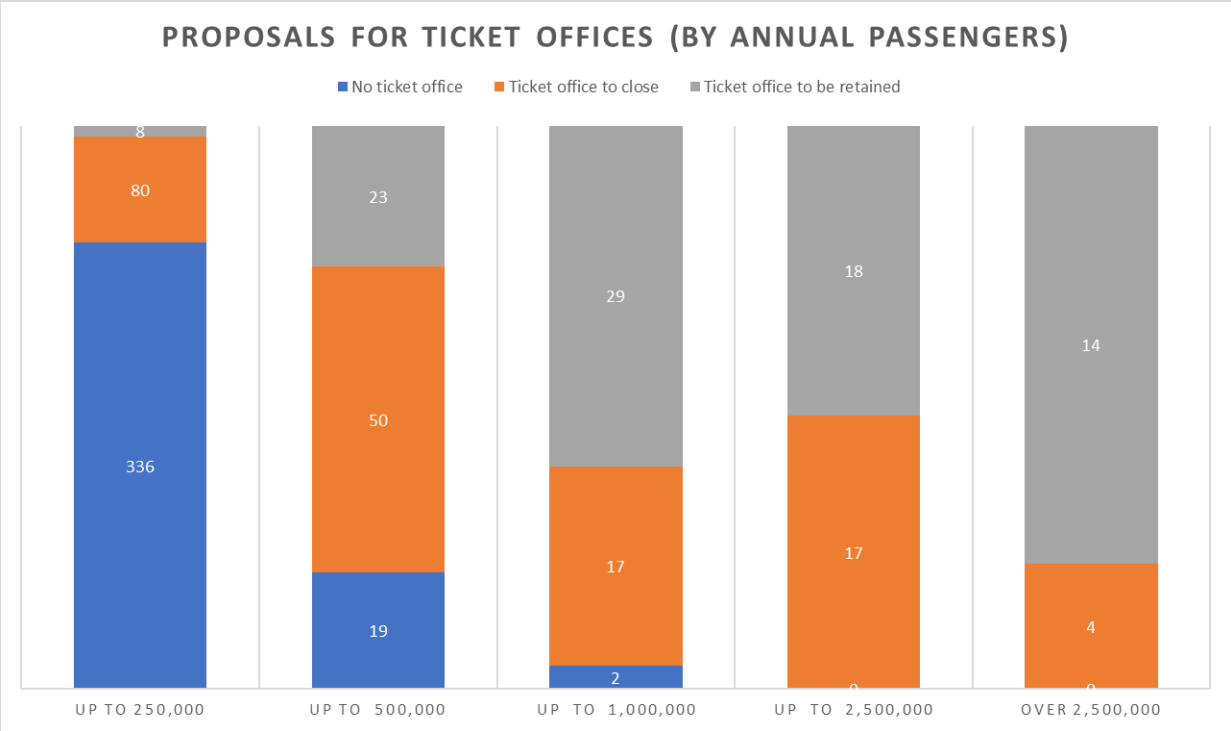
ticket office, with stations being closed or remaining open at all levels of usage across the North.

Figure 1: Proposals for ticket offices (by footfall at stations) across TfN's overall area of interest



4.8 This same pattern of anomalies is still visible, though to a lesser extent, even if Merseyrail's stations are removed from the data, as shown in the chart below. Station ticket offices will remain open at Runcorn East and Whitby despite an annual footfall of under a quarter of a million, whereas (in addition to the aforementioned Avanti West Coast stations) the following stations with an annual footfall of over one million will lose their ticket offices: Barnsley, Bradford Forster Square, Darlington, Dewsbury, Durham, Halifax, Hull, Keighley, Meadowhall, Middlesbrough, Shipley and Wakefield Westgate.

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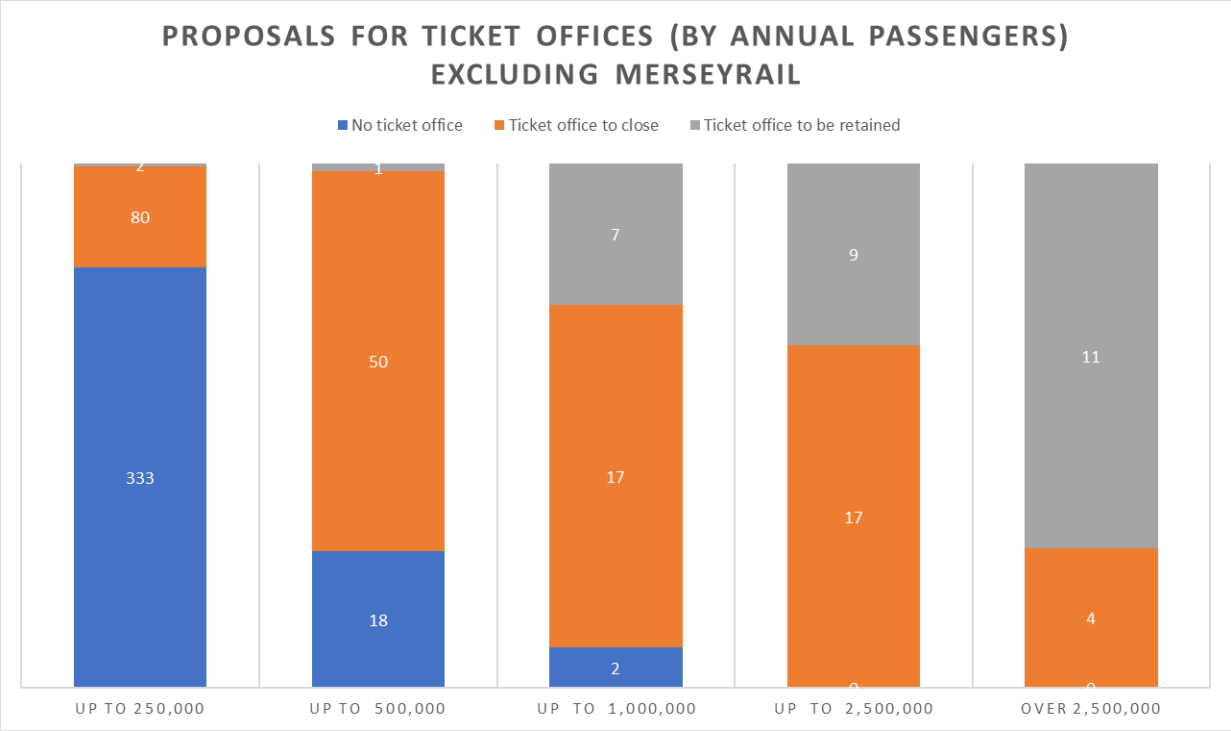
Figure 2: Proposals for ticket offices (by footfall at stations) across TfN's overall area of interest (excluding Merseyrail stations)



5. Strategic alignment and the impact on customer demand

5.1 Transport for the North is of the view that the proposals for a programme of ticket office closures and staffing hours reductions are not aligned with our Strategic Transport Plan and aspirations for the North's railway in a number of ways. Furthermore, we believe that the proposals impede the objectives for the rail industry laid out in the government's own *Great British Railways* White Paper.

5.2 An aspiration common to many rail industry stakeholders is to encourage modal shift from private road transport to rail (and other modes of public transport). The Department for Transport (DfT) White Paper which arose from the Williams Rail Review stated that "To support a green recovery, railways need to encourage a shift away from planes, cars and lorries, become the best option for long-distance travel and improve the whole journey experience."[9] Similarly, TfN's recent *Strategic Transport Plan* also repeatedly cites the importance of encouraging modal shift from private road transport to more sustainable modes (such as active travel and

[9] DfT & Williams Rail Review, *Great British Railways: The Williams-Shapps Plan for Rail,* CP423, 20th May 2021, p. 89 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/994603/gbr-williams-shapps-plan-for-rail.pdf

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public transport) in order to facilitate both decarbonisation and decongestion.[10]

5.3 Transport for the North's *Future Travel Scenarios* forecasts, which underpin our long-term planning, indicate that we anticipate the number of passenger rail journeys to increase by at least 78% by 2050 (from the pre-pandemic 2019 baseline).[11] This forecast relates to our "Digitally Distributed" scenario, which anticipates commercial and residential growth to be concentrated in suburban areas which are relatively difficult to serve with public transport. In the more radical "Urban Zero Carbon" scenario, in which it is assumed that housing and economic development are concentrated in cities, it is forecast that the number of car journeys made in 2050 would be 6% lower than in 2019, whereas the number of rail journeys would be 193% higher. Our plausible scenarios therefore vary from a near doubling to a near tripling of rail passenger journeys by 2050. These scenarios are based on fundamental economic, demographic and technological factors that are expected to change over the coming decades, so are not undermined by short-term trends.

5.4 In this context, anything which reduces the attractiveness of rail travel to the public is misaligned with our strategy and expectations. The industry's *Passenger Demand Forecasting Handbook* (PDFH) specifically identifies the presence of a staffed ticket office as a factor which attracts demand, with a significant uplift over the presence of TVMs only. The impact varies depending on the purpose of the journey being made, and between urban and rural stations, but the Rail Delivery Group's (RDG) research indicates that closing staffed ticket offices would have a measurable impact.[12] This aligns with the many reasons suggested by industry stakeholders and partners as to why closing ticket offices could reduce demand, including:

- Customers prefer to discuss the ticketing options with another person. This is felt to be a particular issue for older customers and those with reduced mobility where ticket offices provide an "anchored location" for customers to access valuable travel information, help and reassurance, as well as tickets;
- Customers sometimes wish to purchase a ticket from an origin station other than the one at which they are located, which is not possible at all TVMs;
- Proposals to attract customers to the railway can depend on making the railway station a hub of the local community, with the co-location of local businesses and mobile working facilities. Closing

[10] Transport for the North, *Strategic Transport Plan: Draft for Consultation,* May 2023, pp. 26, 30-32, 57, 71, 81, 87, 122
https://transportforthenorth.com/wp-content/uploads/TFN_StrategicTransportPlan_Master_web_V3.pdf
[11] Transport for the North, *Future Travel Scenarios: Adaptive Planning to Deliver Our Strategic Vision in an Uncertain Future,* Dec. 2020, pp. 59-77
https://transportforthenorth.com/wp-content/uploads/TfN_Future_Scenarios_Report.pdf
[12] Passenger Demand Forecasting Council, *The Passenger Demand Forecasting Handbook,* Rail Delivery Group, Dec. 2017, Version 6.0, p. B8/4
https://www.raildeliverygroup.com/files/Publications/pdfc/PDFH6/PDFH6B8Stations.pdf

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the tickets offices and reducing the hours staff are present will reduce the human presence and undermine such strategies;

- Some models of TVM fail to meet the needs of customers with disabilities, e.g. blind or partially sighted customers, where the touchscreen of the TVM is not capable of providing tactile inputs. Furthermore, many people with lifelong hearing impairments struggle to read written English (and thus may find it difficult to use TVMs without assistance) but can communicate with a person who is physically present. In many cases the inability of the TVM to meet the needs of customers with disabilities was highlighted in the Equality Impact Assessment associated with their development and installation, with a staffed ticket office highlighted as a mitigation;

- Ticket office staff can sell tickets to those who prefer or must use cash (e.g. the unbanked). The closure of ticket offices is likely to make purchasing rail tickets with cash much more difficult with customers being required to obtain a 'promise to pay' from the TVM and then purchase the ticket on the train. This will exclude people who wish to make advanced purchases (often better value than buying a ticket on the day of travel) by cash and therefore has the potential to hit the most vulnerable in society hardest, including where inequalities exist such as the unemployed, those on a low income, those with low educational attainment;

- Mobile staff (as is proposed as a mitigation to ticket office closures) across different areas of a station could in theory be situated a very long way from customers needing assistance, posing a particular problem for those with reduced mobility. This would be exacerbated for stations with long platforms relying on a road overbridge for inter-connection (such as Cross Gates near Leeds), where at present the ticket office is at least a central focal point;[13] and

- TVMs are often located outside (and are therefore exposed to the elements) which can lead to unreliability. In the event of a TVM being out of order, passengers are supposed to seek out the conductor immediately on boarding the train, but this may not be easy on a crowded service.

5.5 Many of these factors underly the demand uplift that the industry associates with provision of a staffed ticket office. Applying the demand adjustment factors from the PDFH to journeys made from stations in the core TfN area would indicate that, compared to a baseline of the number of journeys made between April 2021 and March 2022, approximately 1.3 million journeys annually would be deterred as a result of the proposed ticket office closures. This comprises circa 60 thousand fewer business journeys, 570 thousand fewer commuter trips, and approximately 710 thousand fewer leisure or other journeys, with a net revenue loss of approximately £17.7 million per year.

[13] e.g. Geoffrey North, 'Ticket Office Staff Are Important on Railways', *Yorkshire Post,* Wed. 26th July 2023, p. 12

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5.6 TfN appreciate that the current PDFH guidance was produced in 2017, and that cultural and technological changes since then are likely to mean that this figure of £17.7 revenue loss from ticket office closures is just an order of magnitude estimate now. However, due to the reduction in staffing hours at many stations, we do not believe that this loss can be significantly compensated for by an increased staff presence on platforms. The PDFH research and modelling indicates that an even higher impact on business and leisure/other demand would be generated by the reduced presence of staff on the platform at some stations, especially in rural areas.[14] As little information has been provided about current on-platform staffing, it is not possible to estimate impact of these changes.

5.7 Furthermore, this analysis may underestimate the revenue loss arising from the closure of ticket offices, due to the impact of losing ticket offices at both ends of the journey on ticketless travel (both intentional and unintentional). Passengers may be more likely to board a train without having bought a ticket, and on busy trains or those without gangways through the whole vehicle, they may not encounter a guard from whom a ticket can be purchased.

5.8 TfN therefore expect that the operational cost savings realised by the closure of ticket offices and reduced staffing hours at some stations will be significantly offset by the reduction in revenue that will result from deterring some journeys. As these lost journeys relate to some extent to customers' desire for the reassurance of staff presence, and this human factor is unlikely to change in future, the financial loss resulting from this will grow in future as underlying rail demand grows due to decarbonisation, population or economic growth, and potentially further urbanisation.

5.9 TfN therefore believe that closing ticket offices and significantly reducing the typical staffing hours at our region's stations will undermine the objective of encouraging modal shift to rail, and is therefore misaligned with our *Strategic Transport Plan,* our partners' aspirations, and the Williams Rail Review. It could also represent poor value for money in itself due to the revenue loss described above.

6. The needs of vulnerable users and non-users

6.1 A very important aspect of our objection is the impact that these changes will have on particularly vulnerable categories of rail users. This is explored in depth in Section 7 below, relating to transport-related social exclusion (TRSE). However, we note that the scale of the impact of the changes on those who would prefer to travel when staff will be available at fixed points at both the origin station and destination will be enormous.

6.2 Older and disabled customers are particularly reassured by a staff presence at both ends of their journey, and this is currently the case for most rail journeys made in the North. As shown in Table 1 above, at present in the North, 88% of journeys start or end (excluding the

[14] Passenger Demand Forecasting Council, *The Passenger Demand Forecasting Handbook,* Rail Delivery Group, Dec. 2017, Version 6.0, p. B8/4

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Merseyrail area) at stations with a ticket office, indicating that about three-quarters of all journeys are between two stations with ticket offices. The implementation of these proposals would reduce the proportion of journey starts or ends in the North at stations with a ticket office to just 44%, which suggests that the proportion of journeys between two stations both enjoying a ticket office would drop to about one-fifth.

6.3 The potential significance of this has been highlighted during the recent performance problems, especially the high number of cancellations experienced by TransPennine Express services. Ticket office staff at stations such as Mossley and Greenfield have been invaluable in providing assistance to customer (especially those from vulnerable groups) when train cancellation rates have been as high as 33%. Ticket office staff can give advice on alternative options and connections to other modes of transport, including selling add-on bus tickets (e.g. local "explorer" tickets). Staff have also been able to request additional stops in train services to cover for cancellations, and request that connecting bus services be held when trains are late. All these benefits of staffed offices at both ends of a journey can be lost if ticket offices are closed, as well as more obvious benefits such as help with boarding and alighting. It should also be noted that safety and information features such as public address systems and CCTV are often locally controlled and could be lost if ticket office staff are withdrawn.

6.4 We also note that, at those stations where it is proposed that on-platform staff will be present, it is often the case that they are scheduled to be deployed at peak hours. We are not certain that this is the most appropriate use of resources, as those passengers most in need of assistance may be least likely to travel at the peaks. This issue needs further research.

6.5 The huge fall in the proportion of journeys between two stations with a ticket office, from circa 75% to about 20%, will impact not only those vulnerable users who feel reassured by a staff presence, but anybody who wishes to purchase an unusual ticket type,[15] who has difficulty using a TVM, or who needs to pay using cash.[16] The scale of this change is further illustrated in Table 4 below, which shows that of fifty of the most common rail journeys made in the North, the number which don't benefit from a ticket office at both ends will increase from just one to thirty-five:

[15] Data from Northern indicates that the types of product which are not as easily available without a ticket office include monthly seasons, national and local railcards, excess fares, seat reservations, changes to advance purchase tickets, sleeper reservations, refunds, platform tickets, and cycle reservations.

[16] The Financial Conduct Authority (FCA) estimates that 1.1 million adults in the United Kingdom do not have] a bank account and are therefore completely reliant on cash.

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Table 4: The impact of the proposed ticket office closures on the most frequent rail journeys in the North (excluding purely Merseyrail routes)

Rail journey		Ticket office at both ends of the journey?	
Station A	**Station B**	**Now**	**Future**
Bingley	Leeds	✓	×
Bolton	Manchester Piccadilly	✓	×
Bolton	Manchester Victoria	✓	✓
Cheadle Hulme	Manchester Piccadilly	✓	×
Chester	Liverpool Lime Street	✓	✓
Chesterfield	Sheffield	✓	×
Crewe	Manchester Piccadilly	✓	×
Darlington	Newcastle	✓	×
Dewsbury	Leeds	✓	×
Durham	Newcastle	✓	×
Glossop	Manchester Piccadilly	✓	×
Guiseley	Leeds	✓	×
Halifax	Leeds	✓	×
Hazel Grove	Manchester Piccadilly	✓	×
Heaton Chapel	Manchester Piccadilly	✓	×
Horsforth	Leeds	✓	×
Huddersfield	Leeds	✓	✓
Huddersfield	Manchester Piccadilly	✓	×
Huddersfield	Manchester Victoria	✓	✓
Huyton	Liverpool Lime Street	✓	×
Ilkley	Leeds	✓	×
Keighley	Leeds	✓	×
Leeds	Bradford Forster Square	✓	×
Leeds	Bradford Interchange	✓	✓
Leeds	Manchester Piccadilly	✓	×
Leeds	Manchester Victoria	✓	✓
Leeds	Sheffield	✓	✓
Leeds	Shipley	✓	×
Leeds	Wakefield Kirkgate	×	×
Leeds	Wakefield Westgate	✓	×
Leeds	York	✓	✓
Liverpool Lime Street	Manchester Piccadilly	✓	×
Liverpool Lime Street	Manchester Victoria	✓	✓
Liverpool South Parkway	Liverpool Lime Street	✓	✓
Macclesfield	Manchester Piccadilly	✓	×
Manchester Airport	Manchester Piccadilly	✓	×
Manchester Oxford Road	Wigan Wallgate	✓	✓
Manchester Piccadilly	Warrington Central	✓	×
Manchester Victoria	Warrington Bank Quay	✓	×
Manchester Victoria	Wigan Wallgate	✓	✓
Newcastle	York	✓	✓
Preston	Manchester Piccadilly	✓	×
Rochdale	Manchester Victoria	✓	✓
Sheffield	Manchester Piccadilly	✓	×
St. Helen's Central	Liverpool Lime Street	✓	✓
Stalybridge	Manchester Piccadilly	✓	×
Stalybridge	Manchester Victoria	✓	×
Stockport	Manchester Piccadilly	✓	×
Stoke-on-Trent	Manchester Piccadilly	✓	×
Wilmslow	Manchester Piccadilly	✓	×

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6.6 Another area of concern is that these changes may impede attracting new customers to the railway. There are many implications of the expected significant increase in rail demand over the next three decades, especially when it is generated by modal shift from private road transport. TfN's *Future Travel Scenarios* would entail attracting customers who do not currently travel by rail to do so, and we will therefore need to be aware of the needs of people who are currently non-users of rail. Evidence presented as part of the Williams Rail Review indicated that some of the priorities of non-users are similar to those of current rail customers, such as the desirability of improved punctuality and reliability, cheaper fares, and more certainty of obtaining a seat.[17]

6.7 However, there is additional evidence which indicates that current non-users may be deterred from rail travel by a number of other factors. Research undertaken for Transport for Greater Manchester (TfGM) has looked at the reasons why some people who potentially could use public transport choose not to (the so-called "rejecters" and "not nows").[18] TfGM have examined methods of changing public attitudes and providing small incentives ("nudges") to overcome any barriers to these potential customers choosing rail.

6.8 TfGM's research during 2021 indicated that only 9% of the general public in Greater Manchester outright rejected the idea of using the railways, whereas 55% were occasional users or "dabblers" (travelling by rail at least once per year but less than once per week). Only 11% were frequent rail travellers, whilst 26% were "not nows" who were open to using the railways but had not done so in the previous year. Encouraging the "dabblers" and "not nows" (together comprising 81% of TfGM's public) to use rail more often is thus the key to generating modal shift.[19]

6.9 Since the previous year had coincided with the first year of the pandemic, it may be expected that concerns about personal safety on public transport would be heightened. The presence of staff at a stable point (such as a ticket office) could be hypothesised as a factor which could ameliorate such concerns. TfGM's research discovered that the major factor preventing "not nows" who could reasonably use the train from doing so was an unspecified "preference for another type of transport" (cited by 64%).[20] This may be related to safety concerns, but there was no direct evidence presented by TfGM that this was the case. Clearer evidence relating to this issue comes from TfN's research into transport-related social exclusion (TRSE).

[17] Transport Focus (for Williams Rail Review), *Barriers to Travel: How to Make Rail More Attractive to Infrequent and Non-Users,* April 2019, p. 13
https://www.transportfocus.org.uk/publication/williams-rail-review-barriers-travel-make-rail-attractive-infrequent-non-users/

[18] Transport for Greater Manchester, *Sales Funnel 2021: Have We Got Moves for You (19th April - 14th June 2021),* Slide 5

[19] *Ibid.,* Slide 7

[20] *Ibid.,* Slide 13

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7. Transport-related social exclusion (TRSE)

7.1 TfN have conducted extensive research on transport inequalities in the North of England, with a particular focus on the issue of TRSE. This provides an in-depth evidence regional base on the unmet transport needs of the diverse population groups and areas of the North, and the consequences of this. TfN have published a research report[21] and England-wide data tool setting out this evidence, as well as *Connecting Communities,*[22] our strategy for achieving a more effective, equal, and inclusive transport system for the North.

7.2 Some of our research directly concerns the issue of safety. Our latest TRSE survey asked respondents to rate whether they had experienced "Feeling unsafe when travelling by bus, tram, and rail", with a score of zero indicating "not at all" and ten indicating "to a great extent". The mean response for various demographic groups was:

Table 5: Perceived lack of safety on the public transport network

Group	Mean score	Group	Mean score
Not disabled	3.8	Disabled	5.4
Male	4.1	Female	4.4
Not a carer	3.9	Carer	5.0
White British	4.3	Ethnic minority	4.5

7.3 A more recent survey of TfN's citizens' panel drew 190 responses from various demographic groups. Of these respondents, 64% replied that they feel safer when there are staff present at a railway station, and 42% believed that the ticket office closure proposals would deter them from future rail travel. These findings can be made available in a separate report.

7.4 Other aspects of TfN's research have focused on the wider impact of transport-related social exclusion. 3.3 million people in the North of England live in areas in which there is a high risk of social exclusion because of issues with the transport system. These are areas in which there is a combination of poor access to key destinations with the transport options available, significant transport inequalities, and multiple forms of deprivation. This issue is relatively more present in the North than in rest of England, with 21.3% of the population of the North living in areas with a high risk of TRSE, compared with 18% of the population of the rest of England.

[21] TfN, *Transport-Related Social Exclusion in the North of England,* Sept. 2022 https://transportforthenorth.com/wp-content/uploads/Transport-related-social-exclusion-in-the-North-of-England.pdf

[22] TfN, *Connecting Communities: The Socially Inclusive Transport Strategy for the North of England,* April 2023 https://transportforthenorth.com/wp-content/uploads/Connecting-Communities_SociallyInclusiveTransportStrategy_April-2023.pdf

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7.5 Across the North, TRSE is most concentrated in post-industrial towns and smaller cities, in communities on the peripheries of our major conurbations, and in coastal areas. These areas have often faced a combination of fragmentation and decline of the public transport options available, entrenched poverty and poor health outcomes, and increasing levels of car dependency and forced car ownership. In these areas and across the North in general, people with disabilities and long-term health conditions, those on low incomes and in insecure work, and those with caring responsibilities are particularly likely to be affected.

7.6 TfN's evidence on transport and social exclusion is the first and, to date only, systematic regional examination of this issue across the transport system. We are therefore well placed to comment on the social impacts of the proposed changes to train station ticket offices, set out in the consultation. On the basis of this evidence, the proposed changes are a significant cause for concern. However, the likely level of impact is different across the two substantive elements proposed.

7.7 **Element One: That staff currently working in ticket offices work instead in visible and accessible locations elsewhere in train stations.** The principle of making station staff more visible and accessible in stations is a generally sound one from a TRSE perspective. Currently, ticket offices are not universally located in the most visible areas of stations, and do not always meet Network Rail's Accessible Station Standards. Whilst there is room for improvement in the accessibility of some ticket offices on the network, they are home to key features which assist customers with disabilities which would not be provided if the same staff were 'roaming' or 'floor walking' at the station.

7.8 While supporting this general principle, our evidence suggests that the relocation of staff from ticket offices to other locations within stations must be balanced against the vital need for consistency. Having no fixed location for staff within a station area – and instead relying on users to find staff if they require assistance – would likely pose particular challenges for customers who are blind or partially sighted, particularly if staff are not immediately identifiable.

7.9 It is also important to note that the Office of Rail and Road (ORR) Accessible Travel Policy requires operators to identify a station meeting point. In most cases, this is the ticket office, noting it is often located close to the station entrance, and presents a fixed, staffed location for customers to make themselves known to staff, and access the help and support they need. It is noted that alternative arrangements could be established to fulfil this purpose and is recognised that the right balance between flexibility and consistency of staff locations will vary across different station environments, and the best way to achieve a balance would be full and meaningful co-design of locations between operators and potential customers. It is difficult to see how this could be achieved in the context of a blanket closure of ticket offices across a large number of stations.

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7.10 **Element Two: A large reduction in staff hours and staff availability to customers across train stations in the North.** The data released by train operating companies as part of the consultation indicates a large reduction in staffing hours at the vast majority of currently staffed stations across the North. In the case of stations operated by Northern for example, TfN's analysis of these data indicates a 58% reduction in total weekly staffed hours, with 34 stations experiencing a reduction of 80% or more. Our evidence indicates that this will have a significant and disproportionate impact on those affected by TRSE.

7.11 The lack of staff at many rail stations in the North already represents a major challenge for many populations affected by TRSE. For some, it is entirely prohibitive of their use of the station, while for others it contributes additional stress, complexity, and uncertainty. Consequently, the number of unstaffed stations currently in the network should be seen as an argument against further reductions, rather than a justification for the proposed changes.

7.12 Our evidence demonstrates that the largest of these negative impacts is likely to fall on customers with disabilities, older customers, and those with long-term health conditions. Surveys, interviews, and focus groups that TfN have conducted with these populations demonstrate that they are already much more likely to face safety concerns, difficulties boarding trains, difficulties in accessing information, and additional cost constraints when using the public transport system in the North. A lack of staff presence can be a significant contributor to these issues, particularly where other support arrangements fail due to delays and disruption. Transport for All have published some research relating to the particular issues that the ticket office closures will pose for older and disabled customers.[23]

7.13 TfN's evidence also indicates that carers, women, and ethnic minority communities are also likely to face disproportionate negative impacts from the reduction in staff hours proposed due to safety concerns in unstaffed station environments. Carers and those from ethnic minority communities are also more likely to face additional barriers to accessing the right ticketing and information required to complete their trip without station staff present. This does not necessarily mean tickets are purchased from station staff, but staff remain vital to their journey experience.

7.14 Those on low incomes and insecure work are also likely to face disproportionate negative impacts from the reduction in station staff. These populations are more likely to rely on cash rather than card or mobile payments, are less likely to regularly use rail services in general and are more likely to face digital exclusion some or all of the time. They are also more likely to face significant cost constraints on their transport choices, meaning that they are more exposed to delays or disruption in their journey. Staff presence at stations can therefore be vital in ensuring these users can adapt to delays and disruption.

[23] Transport for All, *Briefing for MPs on Ticket Office Closures,* July 2023

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7.15 In summary, the evidence available to TfN indicates that the proposed changes in ticket office and station staffing will likely increase the level and risk of social exclusion because of transport issues in the North, with a particular increase in risk and exposure for customers with disabilities. The general principle of making staff more visible and accessible to customers is sound. However, this requires careful consideration and co-design of solutions with customers and prospective users, based on local contexts. Furthermore, the significant reduction in staff hours at most stations proposed will have a direct and disproportionate impact on populations already at a high risk of TRSE, adding to the barriers to using rail already associated with a large number of unstaffed stations in the North. In particular, it is expected that there may be an increase in the fear of crime among those with a protected characteristic (e.g. gender, ethnicity, age, sexuality) who already experience increased anxiety about their safety on the railway network, and this will be perceived as discriminatory.

8. Connected Mobility Strategy

8.1 TfN's Board approved a Connected Mobility Strategy for the North in June 2023. It will be published in September. The strategy covers all modes of transport and aims to make travel in the North more seamless, convenient ,and affordable. It sets out 30 strategic and collaborative outcomes for the region.

8.2 One of the main themes of the strategy is the future of ticketing. We want to reform and innovate how people pay for their journeys and stay connected to places. This means having fares that are fair, flexible, and relevant for customers. It also means having better integrated journey planning and personalisation for when things go wrong.

8.3 Ticket offices remain a visible point for customer enquiry, support in purchases from a complex range of fares, and for customers who cannot access digital systems, and this will not diminish until broad stroke retail and fares reform is delivered. The priority should be in delivering these reforms to organically reduce the support needed from ticket offices, or indeed station staff, and ensure resource is preserved only for passengers who need in-person support at stations.

8.4 Alongside the response TfN is publishing two policy positions under the connected mobility strategy on fares reform and rail retail, and these set out what "good looks like" in those contexts. We believe these should be delivered and achieved before any fundamental change in the availability of at-station customer support and retail. More details can be found in our recent *Connected Mobility Policy Position Statements.*[24]

8.5 This would see simplification (at least at point of purchase) of fares, integration with local zonal structures for seamless onward travel and pay as you go infrastructure, be it tap and cap or mobile based, in place

[24] Transport for the North, *Connected Mobility Policy Position Statement: Rail Retail & Ticket Media in the North of England,* August 2023

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before any changes to ticket offices and staffing arrangements are considered. Likewise modernised retail should be in place to prioritise personalisation, provide automatic support in the event of disruption and offer easier ways for customers to book, manage and adjust customer assistance – this would be under the principle of improving the information offer for customers. More details on this area can be found in our recent report *Developing the Information Offer for Customers.*[25]

9. Proposed way forward

9.1 TfN accept that with the deployment of new technology and changes in customers' approach to buying tickets in recent years, there is merit in holistic changes to on-station staffing and a case for a phased change in ticketing arrangements over the longer term. However, any changes must be viewed in the wider context of station facilities and the passenger experience. TfN's recent *Strategic Rail Report* noted that "only 48% of the 600 stations in TfN's area of interest have step-free access to all areas. At the present rate of progress, the "Access for All" programme will not rectify this until the early years of the next century."[26] As it is for customers with disabilities who are most affected by ticket office closures, progress must be made on addressing their needs before major changes are made.

9.2 In terms of the customer experience that will be delivered at stations across the North, TfN view is that that the attributes below constitute "what good looks like". These should therefore be the norm before any major change to station ticketing:

- **Accessible & inclusive:** This means maintaining a range of ticketing options, from easily identifiable staff at stations providing enhanced support, to self-service machines and various digital platforms;
- **Seamless multi-modal integration:** Rail products and retail are integrated with local ticketing structures, particularly in urban areas, to enable seamless onwards travel, either with account-based ticketing or "Pay as You Go";
- **Personalised & convenient:** Account-based ticketing should enable the provision of tailored offers, discounts, and services based on individual travel patterns, thereby reducing perceived complexity. Pay as You Go and contactless payment methods should be widely accepted, ensuring quick and smooth journeys through stations; and
- **Robust support & infrastructure:** Customers should feel confident that if they encounter problems or need assistance, support is readily available through a broad spectrum of accessible formats, including station staff, help points, social media and phone.

9.3 TfN's view is therefore that major reform to station ticketing arrangements should only be consulted upon and implemented after

[25] Transport for the North, *Connected Mobility: Developing the Information Offer for Customers,* August 2023
[26] Transport for the North, *Strategic Rail Report,* May 2023, p. 41
https://transportforthenorth.com/wp-content/uploads/Strategic-Rail-Report-2023_Final_v3.pdf

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effective and comprehensive measures have been introduced towards improving the accessibility and inclusivity of our region's railway network, through investment in our stations and use of the latest technology. Even then, changes should only be made on a case-by-case basis, rather than through a broad policy change rolled out in a top-down manner.

9.4 TfN also believes that the reform of stations and ticketing should take account of the fact that stations can play a vital role in their local communities by being a focus for voluntary groups. Research published by the Community Rail Network in 2020 indicated that both youth groups and associations for older people can be centred around stations and add social value to their locality.[27]

9.5 In conclusion TfN proposes that as an alternative to these inappropriate proposals for ticket office closures, the North continues to work with train operators and stakeholders to develop a "Stations as a Place" programme which seeks to modernise retailing and other station facilities and embed stations as part of the community. Implementation of such a programme will require investment to support the change and ultimately generate greater revenue and reduce ongoing subsidy requirements.

[27] Community Rail Network, *Looking to the Future: An Exploration of Youth Engagement in Rail,* July 2020 https://communityrail.org.uk/wp-content/uploads/2020/07/Youth-engagement-report-final.pdf
cf. Transport Focus & Great Western Railway, *Age and the Train: How Younger and Older People Use the Train,* June 2020
https://d3cez36w5wymxj.cloudfront.net/wp-content/uploads/2020/06/09105909/Age-and-the-train-How-younger-and-older-people-use-the-train-travel.pdf

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10. Appendix

10.1 As mentioned previously, TfN's area of interest can be defined in various ways, so to assist with any inter-regional comparisons, the data from Table 1 has been disaggregated into two sub-tables. In Table 6 below, the data on ticket office closures is given just for the stations within the three standard regions of the North East, North West and Yorkshire & the Humber:

Table 6: Proposed ticket office closures in the 3 Northern regions (by Station Facility Operator)

Station Facility Operator	Status of ticket offices at stations				Journeys made to/from these stations (2021-22)				
	Ticket office to be retained	Ticket office to close	No ticket office	Total stations	Ticket office to be retained	Ticket office to close	No ticket office	All stations	Proportion from stations to lose ticket office
Avanti West Coast	0	11	0	11	0	17,922,526	0	17,922,526	100.0%
East Midlands Railway	1	0	13	14	7,205,884	0	171,558	7,377,442	0.0%
London North Eastern Railway	3	4	0	7	18,651,404	6,547,142	0	25,198,546	26.0%
London Northwestern Railway	0	2	1	3	0	330,012	30,838	360,850	91.5%
Merseyrail	62	0	4	66	58,166,886	0	716,264	58,883,150	0.0%
Network Rail	2	1	0	3	29,727,684	19,581,442	0	49,309,126	39.7%
Northern	16	124	305	445	24,615,234	37,052,712	22,884,402	84,552,348	43.8%
TfW Rail	2	0	7	9	3,563,380	0	453,750	4,017,130	0.0%
TransPennine Express	2	14	3	19	5,216,212	9,044,768	268,574	14,529,554	62.3%
Transport for Greater Manchester	1	0	0	1	390,384	0	0	390,384	0.0%
Total	89	156	333	578	147,537,068	90,478,602	24,525,386	262,541,056	34.5%
Total (excluding Merseyrail)	27	156	329	512	89,370,182	90,478,602	23,809,122	203,657,906	44.4%

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10.2 Meanwhile, Table 7 below gives the data on ticket office closures for those stations which are technically in Midlands Connect's area of interest, but in which TfN take an interest either because Northern are the Station Facility Operator, Northern call services at these stations, or they are located in Sheffield City Region:

Table 7: Proposed ticket office closures in TfN's wider territory (by Station Facility Operator)

Station Facility Operator	Status of ticket offices at stations				Journeys made to/from these stations (2021-22)				
	Ticket office to be retained	Ticket office to close	No ticket office	Total stations	Ticket office to be retained	Ticket office to close	No ticket office	All stations	Proportion from stations to lose ticket office
Avanti West Coast	0	1	0	1	0	2,302,168	0	2,302,168	100.0%
East Midlands Railway	2	3	12	17	6,703,362	1,640,310	784,062	9,127,734	18.0%
London North Eastern Railway	0	1	0	1	0	456,144	0	456,144	100.0%
Northern	1	7	12	20	588,956	1,338,174	725,818	2,652,948	50.4%
Total	3	12	24	39	7,292,318	5,736,796	1,509,880	14,538,994	39.5%

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