

Date: 25/08/2023
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**CAMBRIDGESHIRE
& PETERBOROUGH**
COMBINED AUTHORITY

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Sent via email to: TicketOffice.GA@transportfocus.org.uk

Dear Sir / Madam,

Greater Anglia - Train Station Ticket Office Consultation, Summer 2023

At Cambridgeshire and Peterborough Combined Authority (CPCA) it is our mission to make life better, healthier, and fairer for all by driving growth that is evenly spread and sustainable. This includes supporting and promoting fair and equal access to transport within our region for all of our communities and railway users.

With regard to the consultation around train station ticket office closure our Transport and Infrastructure Committee wishes to express its deep concerns around the proposals, the details of which are outlined in this response.

CPCA wishes to make the following representations in response to this consultation. They are provided on the basis that the CPCA is of the view that the consultation should be rerun (see below), but that as there is no certainty that this will occur, representations are required.

Sufficient time and information have not been provided to the consultees in such a manner to be able to understand the process and what is being proposed. It is inherent in a fair consultation that consultees are provided with sufficient information to enable an intelligent, meaningful response and that information is provided in a way that is accessible for those who wish to respond to the consultation.

The process is unlawful because it proposes, in respect of each of the stations to which it applies, to discontinue the use of a part of that station without complying, or committing to comply, with the procedure for discontinuing the use of part of a station stipulated in section 29 of the Railways Act 2005. We take the view that the proposal engages s.29 of the Railways Act 2005, therefore the steps so far by your company does not accord with the law. We want to make clear that our response to the consultation is without prejudice to our position that the consultation is legally inadequate, and the process is being carried on in breach of s.29 of the 2005 Act.

Given the potential impact of the proposals, we would have expected that Equality Impact Assessments of the overall proposal and of changes proposed at individual stations be

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available to inform consultee's consideration of the proposals. Without this it is difficult to develop an informed response on how the proposed changes will impact on different groups, including those with protected characteristics. Availability of staff at stations can be important in assisting a wide range of passengers who find using ticket machines difficult and require extra support whilst travelling, and those that do not have access to the internet or do not own a smartphone. Access to rail can be vital in allowing independence and providing access to key services and leisure. The CPCA would like to understand the rationale behind proposed changes at each station, informed by data which it is assumed is available. We would also like to see changes in numbers of staff at each station quantified, as it is difficult to assess whether the changes might be positive or negative for passengers without this.

While consultees have been left in the dark as to what considerations are material for the purposes of this consultation, we note with interest proposed changes to the way tickets are sold and customer service is provided at stations and understand that in our region for example, that approximately 16% of tickets across the Greater Anglia area are still sold via ticket offices. Our view is that staffed, accessible ticket offices are an essential part of the rail network and must be protected.


Whilst recognising that rail usage and consumer expectations are constantly evolving, we hold a firm view that there should always be a minimum level of service that all passengers and other end users should expect. We are concerned that the proposed plan, including the removal of ticket offices, will adversely affect some of our communities who deserve safety, security, and accessibility at all railway stations at all times.

In the event that requests to cancel this consultation are rejected, would you at least consider the opportunity to align ticket office closure proposals with wider rail reform and to consider these together rather than the current misalignment – for example, there is reference in the consultations to tickets that cannot currently be bought at ticket machines or online only being available at stations with staffed ticket offices until the capability to buy them online is introduced. This would appear to significantly disadvantage passengers who do not have easy access to stations which retain ticket offices.

So far as we can tell from the material so far produced by your company, CPCA is therefore of the view that if the capability to buy such tickets cannot be maintained at stations where ticket offices will be closed, any closures and associated changes in staff roles should be cancelled until such capability is available at stations and online.

For many of our rail users within the CPCA region, rail is vital for their ability to connect with friends and family as well as having access to key services such as healthcare, education, and connectivity. Removing ticket offices at railway stations will cause significant disruption to railway customers and local communities, the very people who are the key to keep the passenger railway open and thriving. In addition, our region welcomes a wide range of business and tourism visitors and having an easily accessible rail network is important for these groups of rail users.

We are passionate about independent accessibility for all. Removing staff from ticket offices will potentially make train travel unsafe and increasingly stressful as proposed changes will create significant barriers for blind, visually impaired, disabled, and vulnerable train passengers from being able to travel independently, potentially leading to greater isolation. It is essential that train users have someone to speak to at stations, to be able to purchase a



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ticket manually from the ticket office, to have the peace of mind that there will always be somebody present at all stations to ensure safe access on and off a train and for all people that need it, for a ramp to be deployed quickly and efficiently.

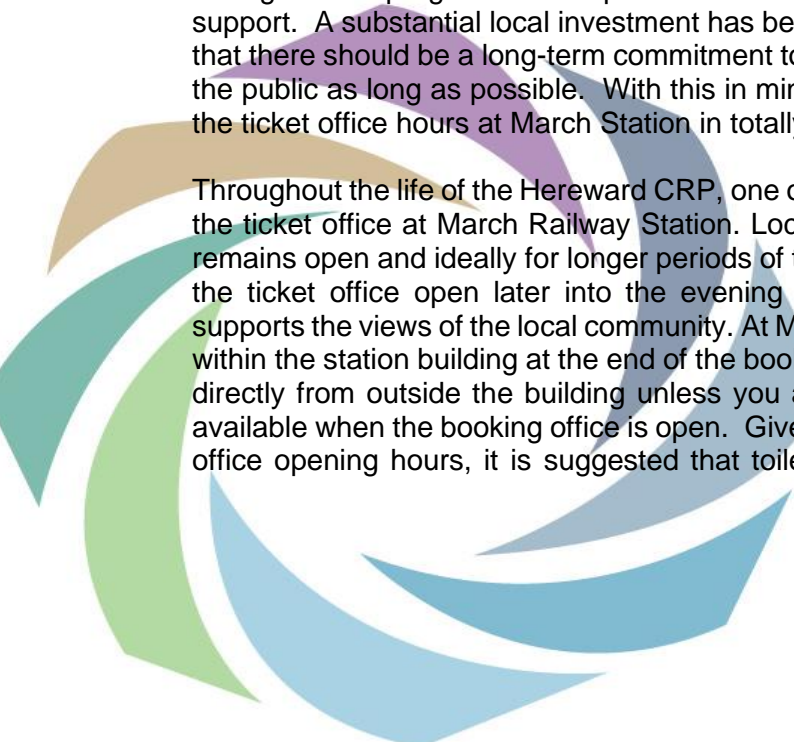
It is acknowledged that there are ticket machines at many stations in our region where customers can purchase tickets. However, not everyone can use the machines and people rely on ticket office staff for assistance and not everyone has access to the internet and not everybody has access to a smart phone. It is essential therefore that the option to purchase a ticket at a train station from a ticket office is protected at all staffed stations and for all unstaffed stations to be staffed to ensure access for everyone who wants to travel independently. In addition, it is our understanding that the majority of tickets will over time be transferred to the vending machines, however the full suite of options will not be available to customers, and this must be rectified to ensure all tickets are offered ahead of any transition.

While it is impossible to make properly informed observations without knowing to what end this consultation is actually directed, it is our view that station staff across our region area provide an excellent service to the community, and this extends well beyond being behind a counter selling tickets. The station staff are regularly seen on the platforms and in the ticket-halls advising customers and providing support and knowledge to assist customers. They provide significant support linked to the passenger assistance scheme and support people with travel advice, while remaining flexible and amenable. It is considered that these roles should continue to be provided and that they already fulfil an approach linked to new and more modern ways of working.

We expect that rail operators deem it essential that disabled and vulnerable passengers are ensured safety, security, and accessibility at all stations with properly trained railway staff to ensure safe access on and off all trains and on railway property. Disabled people should be able to travel at any time and not have the stress of worrying about what will happen at the start and end of their journeys or when they have to transfer to another train.

Locally, in May 2022, a new ticket office, waiting room, car park and toilet facilities were opened at March station. This was at a cost of over £2m pounds of public money. This was funding sought by Fenland District Council through CPCA, with no railway money being spent on the improvements to March Railway Station. The Hereward Community Railway Partnership worked with ourselves and other local authorities to undertake public consultation throughout the programme of improvements and to ensure that any final designs had full public support. A substantial local investment has been made to the station and we strongly believe that there should be a long-term commitment to ensure that the new facilities are available for the public as long as possible. With this in mind, the suggestion by Greater Anglia to reduce the ticket office hours at March Station is totally unacceptable.

Throughout the life of the Hereward CRP, one of the most common comments made concerns the ticket office at March Railway Station. Local people want to ensure that the ticket office remains open and ideally for longer periods of time than at present. Local people want to see the ticket office open later into the evening and also on Sundays. The Hereward CRP supports the views of the local community. At March, the station toilet facilities are now located within the station building at the end of the booking hall. It is not possible to access the toilets directly from outside the building unless you are in the booking hall. The facilities are only available when the booking office is open. Given that the building is locked outside of booking office opening hours, it is suggested that toilet facilities will not be available as at present



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should the booking hall opening times be reduced. The proposal reduces the time there is a staff presence at the station. Keeping the toilets open will require a member of staff to be present or to lock up. There are no consultation proposals provided for March Station specifically addressing how the toilet facilities will remain open although there is reference to such a proposal. It is suggested that such details need to be provided to given confidence to the public that this will be delivered. The CPCA and Hereward CRP (of which we are a part) expects such details to be available and suggests there is justification to object to proposals that have insufficient information attached to them.

In addition to the above we would wish to see further information addressing the following points:

- When will all ticket combinations and services be available via ticket machines and how do operators plan to allow for all passengers to access these in the meantime?
- How will operators improve and guarantee electronic ticket machine (ETM) reliability?
- What is the percentage of stations with only one ETM and what is the average number of days a year each single ETM is out of service?
- What is the average percentage of tickets that need manual assistance at the ticket gates at platform entry and exit?
- How will passengers who are not able to purchase the ticket they need from a ticket machine be protected from penalty fares - will operators end fines for passengers travelling without a ticket because ETMs at the departure station are not in use?

Yours sincerely



Tim Bellamy
Interim Head of Transport



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