HADRAG:

The Halifax & District Rail Action Group

Response to consultation on proposed ticket office closures

Written by J Stephen Waring, chair, July 2023

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HADRAG, the Halifax & District Rail Action Group and is a campaigning rail users group, formed in 1985, geographically centred on the Calder Valley line in Calderdale district, West Yorkshire. Our members are based around the line through Halifax, Brighouse ad Hebden Bridge extending to Bradford, Leeds, York, Huddersfield, Manchester (via Rochdale), Chester and via East Lancs to Preston and Blackpool. Our main train operator is Northern. We also have trains to London via Wakefield provided by Grand Central. Wakefield is one direction for possible future development of services.

It is understood that the deadline for comment on Northern proposed ticket office changes is 28 July, whilst for other train companies it is two days earlier. This initially caused a little confusion.

This submission relates to both (a) general issues and hardship that will be caused nationally if the proposals go ahead, and (b) specific cases of Halifax, Hebden Bridge and Todmorden stations. These are the only staffed stations in Calderdale district, and all three are proposed to lose their ticket offices.

Abbreviations:

HBD – Hebden Bridge

HFX – Halifax

TOD – Todmorden

TO – ticket office

TOC – train operating company

TVM – ticket vending machine.

1 Chair's personal comments

- 1.1 I have been a regular user of Halifax station over many years.
 - Whenever I visit the station there are passengers/customers using the ticket office.
 - Often there is a queue.
 - Often two booking clerks are fully occupied. People are not just buying tickets but obtaining information or asking about bookings.
 - Halifax is a medium size station. Travelling about the network my impression and yes, this is subjective is that Halifax's TO often is busier than Bradford Interchange's and at least as busy as Manchester Vic or Leeds.
 - My observations suggest that TOs at Hebden Bridge and Tod are also well used.
- 1.2 Ticket office staff offer excellent service. My own recent examples include
 - Being offered "split-ticket" options to make a complex journey cheaper;
 - Adding reservations to tickets sold online without reservations;

- Upgrading standard class tickets to first class;
- Getting refunds;
- Advice on reservations (seat positions) on long distance trains;
- Being warned about disruption to service before buying ticket if I had pre-purchased online, or even at the TVM, I might not have realised there was a problem and then had to apply for a refund;
- Other *information* not just retailing.
- 1.3 I have also used the ticket office to plan complex journeys such as week-long rover tickets one ticket but a long list of reservations. There is currently no facility to do such reservations either online or on TVMs; and even if TVMs were upgraded to give reservations this would involve a long session standing at the TVM inconvenient, of course, for other users. This may be a minority interest, but it illustrates the long list of services the clerks in an office can offer more effectively than more "modern" solutions. *Rail passengers are, of course a complex mix of minorities.*
- 1.4 I use rail to travel the length and breadth of our nation.
- (a) I do sometimes book long-distance journeys online but by no means always. Finding the right journey options can be a challenge online.
 - (b) For local journeys I normally use the station TO.
- (c) On one occasion I used the TVM to buy a railcard return to Todmorden (a 20 minute journey). This required a couple of dozen taps of the screen. Asking the TO clerk would have required half a dozen words, including "please". *Human interaction cannot effectively be replaced.*
- (d) On other occasions I have given up on trying to use TVMs, for example when booking for two people both with railcards.
 - > Situations like the above show that IT/TVM-based ticketing can increase time taken and effectively increase journey times.
- 1.5 Booking on the mobile app often raises the question of whether the best deal is immediately obvious. Is there is any data on how many people end up paying more than they need, for example
 - by buying two singles when a cheaper return is available?
 - **or** buying two Advance Purchase tickets (non-refundable) and then changing mind about return train and having to pay again?
- 1.6 It seems that Northern's proposed "Journey Makers" may not have all of the skills to provide all of the services available in existing ticket offices. (Such as actually issuing tickets!)
- 1.7 Para 1.1 to 1.6 above can be applied to other stations including Hebden Bridge and Todmorden. *All illustrate examples of hardship arising from the loss of ticket offices.* The following sections explore some themes in more detail.

– JSW...

Length and timing of this consultationis it legitimate?

- 2.1 21 days (or, confusingly, 23 for Northern) is a very short time to consult on such a major, widespread and national change. And we are at the start of a holiday period, restricting the time for people and their organisations to respond. *The consultation period should be 3 months, not 3 weeks.*
- 2.2 Is not the whole business of general closures of ticket office closures legally dubious? These are not minor modifications. The notices at stations make no reference to the statutory procedure being followed.
- 2.3 There is also inconsistency between different TOCs Manchester Victoria (Northern) retains a TO, but Piccadilly (Avanti) loses its. Even within the same TOC it is difficult to see why Rochdale and Glossop retain TOs but Calderdale stations (Hfx, Hbd, Tod) lose theirs.

- 2.4 The whole process should be staged allowing the right solution to be found for individual stations, every one of which has different conditions. Is not what we are seeing extremely rushed?
- 2.5 Recent announcement of possible legal challenge by five metro mayors is noted.
- 2.6 Information about sales etc at different stations (see next section) was not provided by Northern until after the start of the consultation.

3 Station data supplied by Northern

Calderdale affected stations and others for comparison

- 3.1 The proposals to close facilities at Halifax, Hebden Bridge and Todmorden would leave Calderdale district in West Yorkshire without even one ticket office (TO). Other Calderdale stations are already unstaffed. Comparable stations which are to retain TOs include Rochdale (Greater Manchester) and Harrogate (N Yorks). The logic of this is not clear.
- 3.2 The individual station information provided by Northern only contains data on ticket sales and changes to staffing hours.
 - Information about use for ticket offices for other purposes such as enquiries is not given.
- 3.3 Moreover the individual station information does not clearly set out under "proposed staffing times" whether "staffing" means ticket offices or Journey Makers. This has to be found elsewhere, despite being an important distinction essential to this process.
- 3.4 The information given by Northern compares periods Apr'22-Mar23 and Apr'23-Jun'23. Different lengths of time. Clearly although percentages are calculated this can not be a fair test since it does not account for normal seasonal variations.
- 3.5 That said, we have compared the station info on the affected Calderdale stations with some other stations where it is proposed to retain ticket offices:

Station	то	Ticket purchases					
	remain	Apr 2022 to March 2023			Apr 2023 to June 2023		
	or	Total	Ticket	% at	Total (approx*)	Ticket	% at
	abolish	(approx	office	ticket		office	ticket
		*)		office	* calculated value.		office
Halifax	Abolish	640k	148202	23%	190k (=760k/yr)	34266	18%
Hebden Br	Abolish	280k	61551	22%	83k (=332k/yr)	15666	19%
Todmorden	Abolish	230k	43794	19%	84k (=336k/yr)	11693	14%
Bradford Interchange	Remain	930k	167715	18%	258k (=1032k/yr)	30949	12%
Rochdale	Remain	685k	109558	16%	172k (=688k/yr)	20650	12%
Harrogate	Remain	795k	95421	12%	211k (=844/yr)	21057	10%

It can be seen that:

- for both periods Halifax had more ticket sales at ticket office than Rochdale did, although it is Halifax that is where the ticket office is planned to close;
- Halifax also had more total sales the Rochdale in the more recent period;
- all three stations where TO closure is proposed have higher TO sales percentage-wise than the other three;
- Halifax has higher absolute number of TO sales than Harrogate; and higher than Bradford Inter for the later period;
- In general it is felt that the statistics presented do not justify the office closures proposed.

3.6 **No explanation or prediction** is made about how present ticket office users will buy tickets when their ticket office is closed. Cash was used for TO payments as follows:

Station	TO remain	Tickets sold using cash		
	or abolish	Apr 2022 to March 2023	Apr 2023 to June 2023	
Halifax	Abolish	64487 = 37%	14596 = 36%	
Hebden Br	Abolish	14325 = 20%	4570 = 25%	
Todmorden	Abolish	13636 = 29%	4280 = 34%	
Bradford Interchange	Remain	89340 = 42%	15180 = 38%	
Rochdale	Remain	48762 = 39%	9188 = 40%	
Harrogate	Remain	28586 = 20%	6238 = 19%	

Note that Halifax has almost the same level of cash use as Rochdale and Bradford (where TO are to remain). Harrogate (also "remain") has much lower cash.

- If TO closures go ahead, TVMs may need to be modified so they can take cash.
- Some passengers will be so inconvenienced that they will stop using rail. Is this considered a risk worth taking?
- 3.7 No account appears to be taken of the fact that recovery from Covid is still in progress. Rail travel has begun to recover well and can be expected to boom in the future as people seek to avoid congested roads.
- 3.8 Rail is a low-carbon form of transport, relatively kind to the environment. Rail travel is a sociable activity. Rail travel should be encouraged.

4 Role and organisation of "Journey Makers"

- hours of attendance; what they can do.
- 4.1 The possibility of staff moving about the station is not unwelcome. Northern proposes to call these roaming staff "Journey Makers". The following are major concerns:
 - It is said that staff will be moved out from behind the glass. This means it may well not be easy to find staff, particularly at stations such as HBD and TOD which have two separate platforms. At HFX the station is on two levels. Will the Journey Makers be on the platform or at the station entrance?
 - Staff need a base where they can be found...
 - ... and which is also a place of safety.
 - The obvious location for a staff base will, at many stations, be the present ticket office. This is certainly true of HFX and HBD, arguably TOD also.
 - Staff need a secure retreat point where they are also accessible to passengers and able to watch out for issues. Again in many locations this will be the present ticket office.
- 4.2 Staff hours. The broad claim that that staff are being moved out of ticket offices and onto the wider station is open to challenge:
 - a) Staff hours are proposed to be cut significantly;
 - b) At HFX there will be no staff until scheduled time of the first train of the day (rather than 10 min. before as now) and they will finish at teatime instead of mid-evening;
 - c) HFX currently has 2 staff in the ticket office for much of the day. It is not clear whether this level of staffing will continue with the Journey Makers. There are also staff who help at the "gateline" (HFX does not have physical ticket gates).
 - d) At HBD and TOD proposed staffing will be mornings only (currently all day). **HBD and TOD will not be staffed at all on Sundays.**
 - e) Yet HFX, HBD and TOD are all of them places with visitor attractions town and country. Think only of The Piece Hall in Halifax, and of the huge range of walking opportunities in upper Calderdale. Passengers need support throughout hours of train operation. Staff presence is

- even more important for occasional and leisure passengers than for regular commuters.
- f) On the Merseyrail electric network (not affected by the present exercise) we understand there is a principle of stations (certainly most of them) being staffed from just before the first train until just after the last. This also applies to London Underground stations (where staff are present despite abolition of ticket offices).
- 4.3 It seems Northern's Journey Makers will be allowed to help passengers use TVMs and mobile tickets *but not actually issue tickets themselves*. (This suggests they may be downgraded.)
 - a) Showing people how to use TVM or mobile ticketing will take longer than issuing tickets themselves or having a ticket office. This seems particularly ridiculous.
 - b) Staff need to be based in ticket offices, even if they do not have to be there all the time. Staff already move about when needed.
 - c) If abolition of ticket offices were to go ahead the following conditions must be applied:
 - > Journey makers should be skilled and equipped to sell the full range of tickets;
 - > Journey makers' hours should at least equal present ticket office hours with no loss of staffing numbers. Consideration should be given to extending hours, ideally from just before first to just after last train.
- 4.4 At Halifax two ticket office staff should continue to be present. When appropriate one could be at the ticket desk, and one could be roaming.

5 Passengers with special needs and disabilities

- 5.1 These proposals have a major impact on people with disabilities and others who need help navigating the station.
 - We agree there is an argument for staff being able to come out of the ticket office to help passengers...
 - ... but at many stations the sensible and obvious place to find staff is the ticket office particularly when, as at HFX and HBD, the TO is at the station entrance.
- 5.2 Visual impairment is becoming increasingly prevalent in our aging population. Under these proposals a visually impaired person needing to buy a ticket at HFX would
 - hunt around the station to find a Journey Maker no simple task particularly at busy times, if they are not in a fixed location.
 - They would then need to accompany the would-be passenger back upstairs to the ticket vending machines and actually give them the physical assistance to choose the right options and hit the correct buttons.
 - The would-be passenger would then need to make their way back to the platform.
- 5.3 People with limited mobility would also face many of these hurdles.
 - It will be a massive deterrent to their using the railway.
 - Many people with physical disabilities do not have the option of driving.
- 5.4 When we are trying to enhance the independence of people with disabilities it makes no sense to add to their problems.
- 5.5 The railway is supported financially by the whole population. The railway should serve the whole population. Public transport needs to be regarded as a service to the economy, social cohesion and the response to climate change, rather than a commercial enterprise.

6 Ticket vending machines (TVMs) and other inadequate alternatives to ticket offices

- 6.1 Our rail fares are complex, and so TVMs are complex. See points 1.4 (c) and (d) above.
 - There is scope for simplification, but if TOs are abolished TVMs will need to do even more.
 - It is easy to make mistakes when using a TVM, missing the "railcard" prompt.

- 6.2 It is often quicker to use the ticket office than negotiate with a TVM. (And remember Journey Makers are planned to have limited hours.) The same applies to mobile-phone/internet tickets.
 - Loss of ticket offices will, for many, increase effective journey time.
 - Many will be deterred from travelling by train.
- 6.3 There is a concern that users of TVMs and mobile phone tickets may not infrequently pay more than necessary because they are drawn to less than optimal choices (see 1.5 above).
- 6.4 Many stations have only one TVM, even some with two separate platform. Even when there are two or more, queues at TVMs will build up. People will miss trains and effective journey times will increase.

7 Discrimination against passengers who prefer or have no choice but to use cash

- 7.1 Many passengers still need to or must use cash for payments, including children, people without bank cards, and people who simply wish to exercise their right to use cash.
- 7.2 If ticket offices are removed such passengers will have to obtain a permit to travel from the TVM and then pay the train guard. *However, they will be confronted by notices warning about the £100 penalty fare for travelling without a ticket.*
 - This is clearly a frightening disincentive to rail travel.
 - It is also, arguably, an act of discrimination against cash-users.

8 Ticket offices are not only about sales of tickets

- let's build them up not further run them down
- 8.1 Ticket offices *provide information* as well as ticket retailing. Train times, information on disruption, reservations, changes to tickets already purchased.
- 8.2 They provide a *human presence*. This will only be provided by Journey Makers for the limited hours they are present. Staff presence at stations must be increased, not decreased.
- 8.3 There is talk of selling train tickets at local shops. This is a reasonable idea, but given the complexity of rail tickets it can never provide an alternative to a well-equipped staffed station ticket office. **We should look at bringing local shops and other economic activity into stations, making stations attractive centres of human activity.** (More on this in section 9.)
- 8.4 Station ticket offices have deliberately been run down in recent years, for example:
 - some ticket offers have been restricted to online booking such as 3-year railcards and some advance-purchase tickets;
 - > ticket offices should be able to sell all tickets and other travel products that are available online.
- 8.5 What analysis has there been of why people use ticket offices? Many offices are extremely busy, their users made up of a wide range of actual and would-be passengers and people seeking information.
- 8.6 Nor does there appear to be any analysis of what people who at present use ticket offices will do when their ticket office is no longer there. It has been reported that 13% of revenue still comes from ticket offices. What is the Government's and train companies' strategy for retaining this revenue?
- 8.7 And what is the strategy for providing the information provided at the ticket office when that office is no longer there, and the Journey Makers have finished work for the day?

So has expanding the role of ticket offices been considered? wider retailing and services to suit local situation and add value

- wider retailing and services to suit local situation and add value

9.1 The approach must not be "one size fits all". The present exercise is appallingly rushed, and smacks of levelling down, not levelling up. We say no to that.

- 9.2 What alternatives have been considered? Expansion as opposed to running down? Running down of railway facilities was tried under Beeching and the years following but did not in itself make the railway better. It unlikely that abolishing ticket offices will do so either.
 - Railways are paid for by the whole community, and must be expanded to serve the whole community.
 - That means turning stations into attractive community facilities...
 - ... not faceless automated places staffed at most for only part of the day.
- 9.3 Where appropriate ticket offices could be combined with wider retailing drinks, snacks, travel goods, books & magazines, toiletries even groceries for the evening meal.
 - This has been demonstrated with success on the Merseyrail network (e.g. at Liverpool Central and Southport), and could work in any location where two or more staff are present.
 - Staff could still be available to help passengers around the station but could come into the "ticket-shop" to deal with more complex transactions.
 - In some cases the ticket office could be combined with an existing station shop.
 - That shop needs to be in the station not hundreds of metres away in town.
 - This is about maintaining stations as attractive places to visit, and information-providing gateways to local facilities and attractions.
 - It is something to consider. It will not work in every station.
- 9.4 Complex journeys with a lot of reservations are much easier by talking to staff at a desk.
- 9.5 Information provided by TOs could be expanded e.g. local tourist information. This type of additional activity adds value to the station even if that value is not easy to evaluate in money terms.

10 Conclusion

- 10.1 The proposed ticket office closures are an ill-considered strategy, designed to cut costs. They may also cut revenue as railways and railway stations may become less attractive. This shows lack of imagination and a rushed approach.
 - HADRAG objects strongly to the present proposals.
- 10.2 All transport systems require support from the public as taxpayers. Despite the rhetoric about bringing staff out from behind the glass (to be found where?) it is clear this proposal is about cutting costs, and perhaps downgrading staff. It is not about any true notion of value. *To achieve true value we need to make public transport attractive to more of the people who pay for it, not less.* Rail travel should be for everyone, as workers, leisure seekers, sociable members of the community.
- 10.3 To repeat an earlier comment, public transport needs to be regarded as a service to the economy, building social cohesion, and about the response to climate change, rather than profit making. Railways should serve the whole community. About *value*, not just about price.
- 10.4 **It is clear that hardship will result** for all passengers, including people with disabilities and all who prefer to talk to people rather than struggle with machines if this proposal goes ahead.
- 10.5 Instead of abolishing ticket offices let's reinvent them. Let's recreate them as genuine travel centres that provide everything needed for local, regional and wider journeys, and open them up as gateways to the communities they serve.