

27th July 2023

Rt Hon Mark Harper MP
Secretary of State for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR
Sent By e-mail

Dear Secretary of State

TRAIN STATION TICKET OFFICE CONSULTATION

We are writing to express our concerns about proposals to close 33 out of the 38 Station Ticket Offices in the East Midlands.

Through TfEM we have submitted a comprehensive technical response to Transport Focus by the original deadline as requested, which is appended as an Annex to this letter for information.

However, following representations by elected Members from across the region, including at EMC's AGM on 14th July 2023, we feel compelled to draw your attention directly to the following concerns which we believe should be addressed before any decisions are made.

'De-staffing' of Stations. Whilst there are clearly benefits in moving staff out from 'behind the glass' into broader customer facing roles, these proposals appear to go somewhat further. Based on the published information, there are numerous examples of where a permanently staffed Ticket Office will be replaced by a 'daily visit' (e.g. Newark Castle) or a 'weekly visit' (e.g. Skegness). As a result, it seems to us that there is likely to be a significant decrease in staff at stations across the East Midlands, which will impact negatively on passengers and the perception of rail travel.

Access to Ticketing Products. The consultation is right to point out that only a small proportion of tickets are now bought over the counter at Ticket Offices. However, the current fares and ticketing system is incredibly complex and not all products are available at station ticket machines, including annual season tickets, rail cards, plus bus tickets and refunds.

The ORR has also found that 10% of people using ticket machines failed to purchase the most appropriate ticket for their journey. We support the Government's commitment to fare

simplification and 'smart ticketing', but we are not clear that progress has yet reached the stage to justify the closure of all but five Ticket Offices in the East Midlands – a region of almost 5 million people.

Impact on Vulnerable Passengers. Linked to both these concerns is the impact these changes will have on vulnerable passengers. There remain numerous stations in the East Midlands without a lift (e.g. Melton Mowbray), where passengers with mobility issues will have to use a barrow crossing unattended to cross the tracks to access a platform. We have heard testimony from visually impaired passengers about the difficulties of reading the screens on Ticket Machines. In addition, there is a real concern that single women and older people in particular will feel fearful of using stations that have become essentially unstaffed, especially at night. We note that detailed and consistent 'Equalities Impact Assessments' have yet to be published and request that this omission is rectified at the earliest opportunity.

Finally, we understand the financial drivers behind these changes and the Government's desire to reduce the level of tax-payer subsidy to the railway. However, whilst costs need to be controlled and reduced where possible, ultimately the only way to make rail more financial sustainable is to grow patronage. It is not at clear to us how these measures will result in an increase in patronage, or that any assessment has been made of the impact on farebox revenue.

Yours sincerely,



Cllr Martin Hill OBE
Chair of East Midlands Councils



Sir Peter Soulsby
Chair of TfEM

Transport Focus
RTEH-XAGE-BYKZ,
Transport Focus,
PO Box 5594,
Southend on Sea,
SS1 9PZ

TO:

- TicketOffice.EMR@transportfocus.org.uk
- TicketOffice.LNER@transportfocus.org.uk
- TicketOffice.Northern@transportfocus.org.uk
- TicketOffice.WMT@transportfocus.org.uk (for LNR)

Sent by e-mail 25th July 2023

Dear Transport Focus,

TfEM Officer Input to the ‘Train Station Ticket Office Consultation’

With reference to the published consultation¹, and the proposals published by the four affecting TOCs in the East Midlands (EMR, LNER, Northern, LNR) please find our regional input below.

TfEM:

Transport for the East Midlands (TfEM) brings together 10 Local Transport Authorities (LTAs) across the East Midlands under the auspices of East Midlands Councils. TfEM provides collective leadership on strategic transport issues in the East Midlands, agrees major investment priorities and provides collective input into the work of Sub-National Transport Bodies, the Department for Transport and its delivery bodies. TfEM have published joint transport priorities with Midlands Connect², as well as a Strategic Statement for rail³ which acts as an umbrella mandate for the TfEM Officer collaboration agreement with the DfT⁴. TfEM are now in discussions with GBRt⁵ about the shape of the future partnership to be in place for ‘day one’ of when GBR commences.

The East Midlands:

The East Midlands is a region of 4.9 million people and projected to be the fastest-growing region in England to mid-2028⁵. The region has received the lowest investment in transport for all of the past 25 years, and at just 65% of the national average in 2020-21⁶. If the region was funded at the

¹ <https://www.transportfocus.org.uk/train-station-ticket-office-consultation/>

² https://www.emcouncils.gov.uk/write/Documents/81901_TfEM-MC_Joint_Priorities_Summary_2022_FINAL.pdf

³ https://www.emcouncils.gov.uk/write/TfEM_Rail_Strategic_Statement_Refresh_September_2021.pdf

⁴ <https://www.gov.uk/government/news/greater-voice-for-rail-passengers-in-new-collaboration-between-government-and-east-midlands-transport-leaders>

⁵ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2018based#change-by-region>

⁶ <https://www.gov.uk/government/collections/public-expenditure-statistical-analyses-pesa>

average level, it would have had an extra £1.265bn for transport investment. This sustained level below the average means the gap is growing year on year. Given the recognised role that public transport plays in productivity, liveability, and sustainability for an area, the lack of rail investment could also affect the outlook for regional prosperity and other inward investment decisions. The region has many Local Authorities which feature within the lowest social mobility metrics in the country⁷, and travel choices remain car dependent with the lowest share of commuting by rail in the country; in no small part because of the constrained rail provision between our many centres, which limits rail as a credible option for people. Boosting transport spending in the East Midlands towards the UK average will stem relative decline and will help improve productivity to contribute to achieving sustainable growth to the benefit of the whole of the UK economy.

Introductory remarks:

The TfEM-DfT Collaboration Agreement has offered TfEM an understanding of the pressures the Industry is managing and the associated choices locally in the East Midlands. However, TfEM still receive these new proposals with some caution across a number of implementation areas we identify in this submission as ‘risks’.

In some areas, the ideal level of transparent evidence has not been provided, and this uncertainty creates confusion, heightens vigilance, and impedes our ability to respond in an informed manner.

Overall, our response concludes that, based on the information available, it is not possible to conclude that these measures will result in a net-benefit to passengers in the East Midlands, or increase patronage.

We will look to work constructively with the Industry and the DfT on whether the cumulative impacts to the region can be mitigated, and we offer seven initial suggestions as to how this could be commenced.

TfEM works to collaborate with Government and Industry to progress the shared vision by Local Authorities for a growing railway in the region. TfEM members believe that policies that seek to increase revenue through investment are superior to cost focused initiatives that risk making the public offer worse, and therefore further inhibiting financial sustainability in the medium run. The national scale of these proposals and other shortcomings in the consultation process, indicate that the principal of the initiative being proposed is about industry cost, and not really about the merits of individual Ticket Office location cases – for which we believe TOCs would have otherwise proposed change in a more graduated and specific manner.

In this submission, TfEM offer a regional perspective on the principles of the proposals, and we anticipate separate local representations for the individual stations – noting the absence of much

⁷ <https://www.gov.uk/government/publications/social-mobility-index>

individual station data in the public domain for East Midlands locations. We hope more data will be made available before implementation which we can consider, in order to update to our position.

Please note that we have chosen to adopt the Northern Trains term ‘Journey Maker’ when describing the new proposed roles for ‘multiskilled’ customer ambassadors – but this should be read as to be common to all TOCs when interpreting our responses.

The Context of Rail Operator Budgets:

TOC operational funding is currently shaped by the short-term horizon of a TOC Annual Business Plan (ABP) within their National Rail Contract. This is an iterative plan between the TOC and the DfT who apportion a budget from the overall Resource Departmental Expenditure Limit (RDEL) budgets, most recently identified at a whole Transport level within the HMT Autumn Statement⁸, and as indicated as decreasing from £8.3bn in 22-23 to £5.7bn in the two years to 24-25, which must also absorb the emerging effects of inflation. The Government are working with Operators to progressively reduce the cost and subsidy of the railway since this increased as a proportion of Industry income during the 2020 Coronavirus Pandemic.

“UK rail faces a multi-billion pound funding gap. HM Treasury and DfT are unwilling to continue funding that under any circumstances or ownership model. That difficult position is because of essential calls upon the public purse, like the NHS. Therefore, DfT has instructed c2c to make significant cost savings. This proposal is in response to that DfT instruction”. – c2c Consultation Materials⁹.

Approaches to reducing the Industry funding gap may consider both reducing costs, or increasing revenue and yields, or a combination of both – noting the direct interdependence of cost and revenue. But which also should include the interdependence of subsidy with non-revenue benefits such as car related externalities and regional productivity GVA that benefit everyone including non-rail users.

We identify that one potential but missed opportunity from the proposals, could have been to re-invest the budget in alternative passenger improvements. However, we observe no such trade-off presented within the consultation materials. We anticipate that the annualised budget forecasts for future years have already assumed a reduction in the cost base from the implementation of this policy; and as such we assume there is no reinvestment opportunity from TO closures and associated actions.

Objectively, if these proposals were rejected, and the status quo remained (and importantly that the target annual budget cascaded to East Midlands TOCs for future years remain fixed), then TOCs could be assumed to be instructed to find equivalent annual OPEX cost savings elsewhere, which

⁸ <https://www.gov.uk/government/publications/autumn-statement-2022-documents>

⁹ <https://www.c2c-online.co.uk/app/uploads/2023/07/64a4310c2cc8f-64a4310c2cc91Transport-Focus-FINAL-05-JULY-2023.pdf>

could risk introducing new alternative passenger facing detrimental changes (such as further train service frequency cuts) – or increasing the severity of already planned changes beyond that currently envisaged. There is the potential that an objective position to take, by those who fully understand all the cost drivers and fixed constraints of the current NRC pressures, could conclude that these TO closures and de-staffing proposals could be the ‘least-worst’ option. TfEM are unable to provide an informed assessment of this, simply to repeat that TfEM support a growing railway in this region, and therefore limit our further input to discussion of the risks of the proposals alone.

The communication of the proposals:

We understand that due to the context of the recent stalemate of negotiations between the Rail Delivery Group (RDG) (as underwritten by a Governmental mandate), and some of the Rail Industry Unions, these workforce reform proposals have been cascaded to individual TOCs to implement separately. This has led to an inconsistent approach of public communication materials formats, inconsistent messaging, and inconsistent levels of transparency. The East Midlands is a particular case where LNER, LNR, Northern and EMR who manage the regions stations have all presented different details.

Some of the messaging for these proposals by Government, TOCs, and other agencies, has been observed as speculative and subjective. At times this has made the interpretation of the materials challenging, in order to filter the opinion from the fact. The language to justify the proposals has at times not been specific enough, and at times has not supported the transparency of the debate.

TfEM suggest that Transport Focus insist that equal and equivalent data is published for all regions and stations. The benchmark should have been the Scotrail consultation held for similar changes in December 2021¹⁰. We suggest minimum detail should include:

- The travelling distance between the station and the nearest open Ticket Office
- Travel mode alternatives available for the station location
- Share of TO transactions against other methods for the station location
- The number of tickets issued and types of tickets issued at the TO
- The number and nature of non-ticket retail transactions provided by the Ticket Office
- An audit of the ease of transition at a location e.g. number and location of ticket vending machines
- The new retail options for all TO related transactions at each station
- The method of currency transactions for all journeys retailed at a location e.g. cash, card, voucher etc
- The station’s role during planned and unplanned disruption
- The equality impact assessment for each location

¹⁰

https://www.scotrail.co.uk/sites/default/files/assets/download_ct/20220211/kCcC8b4yoKiZb263exkRBIRIWpev1lenyPaJ0Jsunc/in383_s17_review_consultation_v6_10feb22.pdf

- The current and future staffing hours and staff volumes at those times – including comparison of the skills & roles of future station staffing.
- The current and future accessible station facilities and their times of availability.
- Plans for their future repurposing of the TO properties.

As is, we believe Transport Focus will garner an imperfect collective view of the impact to passengers locally, nationally and in the regions due to the imperfect consultation materials offered by the Industry.

The regional impact of the proposals:

- In the East Midlands 33 of the 38 station ticket offices are proposed to be closed¹¹. There will be no formal Ticket Office at any station in the Local Transport Authority boundary of: Nottinghamshire, Leicestershire, West Northamptonshire, North Northamptonshire, or Rutland.
- The Northampton Ticket Office is counted within our ‘TO closed’ figures, noting that LNR suggest that Northampton will become a LNR ‘hub’ with “staff available throughout the week”. We interpret this as closed due to no certainty as to the staffing hours and functionality envisaged by said staff. We understand it will no longer be a statutory Ticket Office.
- Of the 32 remaining closures, 9 are proposed to have comprehensive coverage of hours for staff at the station¹²; 7 are proposed to have at least ‘daily visits’ of TOC staff (note Buxton and Corby are both presented with confirmed hours of the coverage)¹³; 6 are proposed to have coverage for staff attendance for multiple days per week¹⁴, and 10 are proposed to move to at least ‘weekly visits’ of TOC staff¹⁵.
- 5 Stations in the region are proposed to remain open as formal Ticket Offices with revised operating hours¹⁶. Where those remaining Ticket Office opening hours are proposed to change, they appear marginal changes from today – see Annexe 2. We assume the TOC is taking the opportunity to align their proposals for changes in the hours with those of passenger need rather than operational convenience. For balance, the proposals identify 2.5

¹¹ West Northamptonshire (LNR: Long Buckby, Northampton)
North Northamptonshire (EMR: Corby, Kettering, Wellingborough)
Leicestershire (EMR: Hinckley, Loughborough, Market Harborough, Melton Mowbray, Narborough)
Nottinghamshire (EMR: Beeston, East Midlands Parkway, Mansfield, Newark Castle; LNER: Newark Northgate, Retford; Northern Trains: Worksop)
Derbyshire (EMR: Alfreton, Chesterfield, Long Eaton; Northern Trains: Buxton, Whaley Bridge, New Mills Central, New Mills Newtown, Dinting, Hadfield)
Lincolnshire (EMR: Boston, Skegness, Sleaford, Spalding, Stamford; LNER: Grantham)
Rutland (EMR: Oakham)

¹² Kettering, Wellingborough, Loughborough, Market Harborough, East Midlands Parkway, Chesterfield, Newark Northgate, Grantham, Retford

¹³ Corby, Beeston, Newark Castle, Alfreton, Long Eaton, Buxton, Boston

¹⁴ Dinting, Hadfield, New Mills Central, New Mills Newtown, Whaley Bridge, Worksop

¹⁵ Long Buckby, Hinckley, Melton Mowbray, Narborough, Mansfield, Skegness, Spalding, Sleaford, Stamford, Oakham

¹⁶ Glossop, Derby, Lincoln, Leicester, Nottingham

hours net more open Ticket Office hours on a Sunday at Lincoln. EMR state their remaining open Ticket Offices will offer an 'enhanced customer experience'¹⁷ but as yet it's not clear what this is proposed to offer in addition to today's provision.

- Many TOCs refer to the volumes of stations that already operate without Ticket Offices within their materials. These are perceived by TfEM as the least likely to incur the risks that we identify in this submission on any regular basis. That these smaller stations operate with no Ticket Offices today is, in our view, not a valid leading indicator for larger stations. There are also merits of increasing staffing at some of these 'staffless' stations – as was identified in the successful Abellio/EMR 2019 franchise award which had 'more staffed stations' planned¹⁸. Where is the analysis of the impact on smaller stations that are currently unstaffed, but rely on nearby staffed stations - if these are to have less staff in the future, what is the knock-on impact?

¹⁷ <https://www.eastmidlandsrailway.co.uk/modernisation-consultation> (Accessed on 12th July 2023)

¹⁸ EMR 2019 Franchise bid – I recall 9 restaffed stations, staff at all stations with 150kpa footfall, and all Intercity stations to be staffed 'first to last' inc at gatelines

Bulleted summary of the Opportunities and Risks:

The following section is set-out to provide a discussion of each identified risk (R-1 to R-7) to these collective proposals in the East Midlands. We seek to be open minded to the opportunities and seek to achieve a balanced perspective given the evidence available. The discussion can be summarised as in Table 1.1.

Table 1.1

Opportunities		Risks	
O-1	Resource productivity changes	R-1	De-staffing at locations
O-2	Reinvestment of efficiencies		
O-3	Staff motivation changes	R-2	Staff motivation changes
O-4	Accelerate digital retail transition	R-3	Harder to access ticket products
O-5	Customer visibility changes	R-4	Harder to access the railway
		R-5	Perceived less secure railway
O-6	Revenue and yield source changes	R-6	Loss of revenue
O-7	Property utilisation changes	R-7	Unsustainable alternative property uses

Risk 1: De-staffing at locations

The Rail Minister on 6th July 2023 welcomed the proposals from TOCs:

"I firmly believe that taking people out from behind glass and putting them into areas where they can be best accessed will mean that they will be able to give passengers the greatest help, making for a better rail experience."¹⁹

The RDG also suggest that:

"The changes would mean a more visible and accessible staff presence "²⁰

TfEM agree that the opportunity to improve visibility and support to passengers is a welcome consideration. However, taking the evidence provided by the TOCs within the materials published we find some of the changes indicate a de-staffing²¹ at East Midlands locations from the levels which they enjoy today, in some cases potentially significantly. As such we are not persuaded that in all cases this is about "getting out from behind the glass". There is contrary evidence in these proposals to the statements made by the Minister and RDG for some locations in the East Midlands. The proposal from TOCs for de-staffing at some locations is a greater risk to passengers than the re-purposing of the Ticket Office cubicles themselves.

We have listed the proposed station TO and staffing arrangement changes in earlier sections and in the enclosed Annexe. Some locations have certainty of less staff *coverage for passengers* (without detailing the overall comparative future staffing provision). As an example, Hadfield is moving from 13hour TO weekday coverage to 3-and-a-half-hour generic station 'staffed' coverage.

There is also uncertainty for what a 'daily visit' would entail for passengers at Beeston, Newark Castle, Alfreton, Long Eaton, Boston. Newark Castle and Beeston currently enjoy in excess of 13hours coverage of TO staff at the station each weekday.

At the extreme, for the sparsest proposed station staffing plans, there is uncertainty for what 'weekly visits' would entail for Long Buckby, Hinckley, Melton Mowbray, Narborough, Mansfield, Skegness, Spalding, Sleaford, Stamford, and Oakham. These are places that currently have roughly between 6 and 9 hours of TO staff station coverage each weekday.

The method of how each location has been categorised is not clear. A fixed plan to transition to merely a once-a-week visit may be harsh, leading to poor outcomes. We suggest a more transparent approach and a graduated plan, if at all. A number of the 'weekly visit' locations appear strategic to

¹⁹ <https://hansard.parliament.uk/Commons/2023-07-06/debates/22E13B85-0B30-4166-8C79-ABCBD8F891090/RailTicketOffices?highlight=screens#contribution-F57ED9A2-2C18-4A46-90FB-0FB20CEED877>

²⁰ <https://www.raildeliverygroup.com/uk-rail-industry/customer-focused-reform/customer-focused-stations.html>

²¹ We define 'de-staffing' as both fewer cumulative hours of total staff attendance per day at a location than today (July 2023) and/or less breadth in coverage of customer facing time than today – whether that be fewer daily hours or fewer resources per hour or both.

the network and economic population catchments that could warrant a strategic revision of their categorisations beyond only once a week visits. There is a risk that the practical usefulness of a weekly visit is limited, and as such, in the search for further efficiencies in the future, the staffing plan changes quite quickly escalate, with further erosion to function and ultimately to a formally staffless station.

Further observations on staffing include:

- Buxton will now receive no 'journey maker' hours after 18.00 on weekdays or Saturday, or 17.00 on a Sunday. Buxton provided 21% of its transactions via the Ticket Office in the most recent Northern Trains data²².
- Worksop experienced 18% of transactions through the TO and 37% of transactions in cash. This location will transition to a card only TVM only, and will receive no journey makers before 09.00am or after 15.00, and nil on Sundays.
- Hadfield had 42% of transactions at the Ticket Office in the sample data and only has a single TVM. During the week the station will have Journey makers for 2 hours in the morning only.
- Narborough and Hinckley are EMR managed stations where CrossCountry provide the only passenger services. The proposals should be supplemented by publicly transparent customer service staffing plans by CrossCountry.

These are examples identifiable simply because the data has been more transparent from Northern Trains. The examples show that they could be worthy of some reconsideration.

Ultimately de-staffing through reduced coverage of station staffed hours, (potentially with fewer staff cumulative hours, and moving to daily or weekly visits in the extreme) - does not appear to "bring staff in front of the glass" to levels at least as equivalent to the service enjoyed today.

- Will new hours of cumulative staff time at locations erode today's levels by more than 20%? 50%? 75%?
- How many hours per week will these mobile teams spend at stations?
- What will the approach be for advertisement of staffed customer services at set times, and to also ensure for further contingency²³?
- What functionality will the multi-skill journey maker staff offer at those times compared to today? (Northern and LNER appear to indicate anything sophisticated will not be provided.)

²² <https://www.northernrailway.co.uk/sites/default/files/2023-07/Station%20Reform%20120723.pdf>

²³ We assume the proposals are not as draconian as to 'only' visit at the set advertised times each week and contingency will be planned in for more urgent unplanned issues such as managing locations in times of disruption; but also, predictable contingency such as seasonal platform gritting.

Schedule 17 of the Ticketing Settlement Agreement (TSA)

Schedule 17 (Sch17) of the TSA²⁴ sets out the list of regulated stations i.e. those regulated to have a staffed Ticket Office, and the ticket office's regulated opening hours, and is the only instrument for regulation of staffing at stations. This RDG-TOC agreement was originally envisaged as arbitrated by the SRA, but is now a decision for the Transport Secretary. Making changes to this regulation is important because in the years ahead it can be easy enough for managers to change operational direction on the need for a Ticket Office in the sense of a functioning retail property at a station, but highly impractical for Governments (or their agents such as a future SRA or GBR) to change their minds on the staffing protections offered by a Sch17 at station locations. In this context TfEM ask for clarification that the 5 Ticket Offices proposed to remain in the East Midlands will indeed still be *Statutory* Ticket Offices?

The future release from Sch 17 for many station locations is a risk to the East Midlands for future further de-staffing proposals, even beyond that currently presented by TOCs at this point in time. Whilst some indications from TOCs currently propose comprehensive station hour coverage at some stations such as Chesterfield – there are no guarantees on the passenger facing staff headcount that the coverage will include compared to today; and thus the change could have significant effects on the actual customer service levels offered at these locations like Chesterfield.

Importantly nor does the change offer any guarantee that in the near future, more acute, de-staffing will not be employed. The loss of Sch17 protections offers uncertainty; and our understanding is that there are no requirements to publicly consult on future de-staffing proposals after Sch17 is lost, either at station offices, on platforms, or on train.

We are open that Sch17 as currently written, in many cases, may restrict staff from optimal productivity for their employers, and indeed utility to passengers. TfEM supports TOC efficiency initiatives through getting more from their resources and putting them in the right place. But it is harder to endorse proposals that promise to 'do less with less', than today's provisions.

It is the de-staffing risk that is at the heart of the other risks we go on to identify within our submission.

One example is accessibility. In considering the materials offered by other TOCs outside of the East Midlands, we see that many of the South Eastern TOCs EQIA responses²⁵ included saying that there are no impacts on equalities at some locations as there will be the same or better staffing hours. There are a number of stations where this argument would not appear to be true in the East Midlands.

²⁴ <https://www.raildeliverygroup.com/our-services/rdg-accreditation/ticketing-settlement.html>

²⁵ <https://www.southeasternrailway.co.uk/ticketofficeconsultation>

“Visibility...”

TfEMs belief is that *more* ticket offices and *more* station staffing could offer more visibility.

Aside from this observation, the ability for these plans to deliver ‘greater visibility’ is based on good faith in the good intentions within the TOCs themselves. Along with the absence of any new regulations for station staff coverage, there appears only marginal commercial incentives within the NRC (where cost driver initiatives receive primacy). It is not clear that for the hours that a quantum of staff *do* attend a station, whether this will offer greater visibility than today during those hours.

Whilst TfEM has already shared that we are not wedded to Ticket Office cubicles, it is objectively observable that the Ticket Office is a known location point of reliably accessing staff to perform retail and resolve queries. This known location does not make the staff necessarily *less* visible. Conversely in the future, there could be increased practice of passengers chasing around stations looking for the few (or sole) multi-functional staff, forming ad-hoc queues on platforms, and staff being ill-located in inaccessible places due to the demands at that point in time. It’s not certain that the forgoing of the fixed location of the Ticket Office for the generically “in front of the glass” flexibility will improve visibility for customers.

Curiously, with the TOCs ambition that more passengers will learn to ‘help themselves’ (and as more retail and communication is moved onto remote sources), the ability to ‘front up’ these remote communications and transactions in person will be critical to the success of the Industry. It’s not linear that an extra digital transaction is always one less physical transaction.

How severe this de-staffing will be on customer service and outcomes can only be observed through the implementation of the mitigations, and the adoption of the lessons learned by the TOCs over the initial periods. We suggest mitigations that seek to lessen the impact to passengers - whether that be new minimum station staffing guarantees in legislation, or a more complete categorisation exercise with a higher threshold for ‘busy’ than has been used to date, which is then linked to staffing levels, not just TO openings. We suggest a more graduated transition with at least equivalent staffing levels to today until such time as the fare system is reformed and technology mitigations are improved.

Risk 2: Staff motivation changes

The RDG cite that there will be staff motivation and productivity improvements:

*"It is very much a better working environment, I've got more job satisfaction helping out the customers."*²⁶

There is less from EMR, LNR, LNER or Northern Trains themselves in their materials on the benefits to staff from these proposals.

The specific impact to staff employment is unknown. There are no details on processes for voluntary severance schemes or compulsory redundancies in the public domain. The Guardian reports that Section 188 notices have been issued²⁷ in parallel with the passenger impact consultation. Whilst TfEM obviously wants to see skilled well-paying jobs retained in the region, TfEM equally does not want to see an increase in zero-hour contracts going forward from these changes.

It could reasonably mean fewer TOC station FTEs overall, and mean broader multi-functional demands across multi-locations for those in Journey Maker roles. The positive is that the proposals should aid levelling out the productivity troughs that potentially exist in today's working practices and restricted by Sch 17 of the TSA. But in the future may give cause to exceed reasonable peaks in workload too often for journey maker staff - with increased cases of staff being overwhelmed leading to frustrations for staff and passengers alike.

This risk stems mostly from the associated de-staffing risk, rather than the Ticket Offices closures themselves. It is not obvious to industry outsiders like TfEM, that skills for the new multifunction at-station roles are sustainable by all individual resources; and it is not obvious that the proposals to simply 're-train' staff are risk free. It is not clear that the combination and rationalisation of subject matter expert staff would actually deliver net-benefits to customers. There could be a loss of deep expertise, which will not be maintained in the same ways through specialist practices, and may have an industry detriment – possibly felt hardest by the TOC themselves each day.

Our observations on this risk for changes to staff motivation are somewhat speculative. TfEM hope that the plans are 'as sold' by the TOCs and will bring a betterment, and thus staff motivation is more an opportunity rather than a risk from these proposals. TfEM note that we have confidence in the current people in the TOCs management, and the TOC staff at the stations, and that they do want the best for customers and will try to maintain service in what appear difficult resourcing circumstances.

²⁶ <https://www.raildeliverygroup.com/uk-rail-industry/customer-focused-reform/customer-focused-stations.html>

²⁷ <https://www.theguardian.com/business/2023/jul/05/plans-for-mass-closure-of-railway-ticket-offices-in-england-confirmed>

Risk 3: Harder to access ticket products

The TSA defines the opening hours and the range of products which must be sold at each ticket office. The product range is defined in terms of the products contained within the National Rail Enquiries Internal NRE Knowledgebase.

Much of the TOC consultation material cites current digital trends for retail, and that they see the closure of ticket offices as accelerating the digital retail transition for those that currently practice physical retail. There are two main observations here:

Firstly, is that a Ticket Office does not preclude take up of digital retail – we think Railfuture say it best when they state that digital retail can be encouraged but not forced²⁸. The proposals do not ‘bring ticket retail up to date’ – this is a misnomer, closing TOs does not improve the digital offer.

Secondly is that alternative retail means are not yet equivalent to the TO, and thus the proposals do make it harder to access some products or transaction types. In this regard there are many Industry experts who could inform Transport Focus of the details of this product shortfall far more comprehensively (e.g. Man in Seat 61²⁹). The EMR FAQ (no 9) itself identifies that:

“82% of tickets customers purchase are already available at stations through self-service ticket vending machines. This will remain the same for customers who prefer to buy tickets in person and for the remainder, ticket offices will still be available at busy interchanges which sell the full range.”³⁰

We understand that efforts to improve the ticketing and fares platform from 82% to 100% are centralised, costly, and have no confident timeline. As examples, LNER transparently confirm where primary retail transactions will take place in the future:

²⁸ <https://www.railfuture.org.uk/Press-release-2nd-July-2023>

²⁹ <https://www.seat61.com/>

³⁰ https://www.eastmidlandsrailway.co.uk/sites/default/files/assets/download_ct/20230711/ZYX_Bk1glQ-cZ5J8U7Vf6XLN-daVkVCmw4gczzjdyys/faqs_for_east_midlands_railway_emr_on_stations_ticket_office_reform.pdf

Table 1.2

Where customers will be able to buy products in the future
If the proposed plans are implemented at our stations, tickets will be available/not available via the following channels:

Products	Online	TVM	On Train	Customer Information Centre ¹	Call Centre	Impacted stations ²
Walk-up	Y	Y	Y	Y	Y	Y ³
Advance	Y	Y	N	Y	Y	Y ³
Season (1-12months)	Y	N	N	Y	N	N
Season (weekly)	Y	Y	Y	Y	N	Y ³
Season Replacement	Y	N	N	Y	N	N
Rovers & Rangers	N	N	N	Y	N	N
Excesses	Y	N	Y	Y	Y	N
Railcard Discounts	Y	Y	Y	Y	Y	Y ³
Railcard Sales	Y	N	N	Y	N	N
Photocards	N	N	N	Y	N	N
Refunds ⁴	Y	N	N	Y	Y ³	N
Seat Reservations Only	Y	N	N	Y	Y	N
Staff Discount Travel	Y	N	Y	Y	N	N

* Tickets can only be refunded at the point of purchase.
¹ Available at TVMs at impacted stations where the Ticket Office is proposed to close.
² Ticket Offices will remain at Doncaster, Edinburgh Waverley, Peterborough, London King's Cross, Newcastle and York in the future. Ticket Offices at these stations will be known as Customer Information Centres.
³ Borewick-upon-Tweed, Durham, Darlington, Wakefield Westgate, Retford, Newark Northgate and Grantham will be impacted by our station proposals. These stations will go through the major change process as part of the requirements of the industry's Ticketing and Settlement Agreement.

Prospective passengers will not be able to obtain the following products at some East Midlands station locations who are losing their TOs:

- Annual Seasons
- Season Replacement,
- Rovers & Rangers,
- Excesses,
- Photocards,
- Refunds,
- Plus-Bus,
- International (Eurostar) link tickets,
- Seat Reservations,
- and Rail Cards.

LNER are transparent that EM passengers who can also not access these services online will have to physically go to Doncaster or Peterborough – both outside the East Midlands altogether. Another case raised was that if you are travelling on an advance ticket and your connecting service is delayed, LNER can currently require you to get your ticket endorsed at the ticket office, which won't work going forward. We are unclear across the East Midlands regions TOCs about other transactions at stations such as changing dates on Advance Purchases, collection of Advance Purchases, bike reservations, pensioner discounts, disability discounts, paying for car parks in any other way than with a smartphone etc.

It's not clear; it's likely there are locations that are better than others and some locations worse than others – but none better than today. The only way to drive consistency would be through an audit and then investment to ensure locations receive equivalent mitigations. This consultation cannot be considered an audit by proxy.

This risk of making it harder to access products is a combination of the impact of the loss of the TO itself, and the proposed de staffing. The functionality will be lost with the Ticket Office Ticket Issuing System (TIS) access at locations unless the TIS is accessible from all station staff, and station staff are available in the same volume as the TO hours which are enjoyed today. Currently not all station staff have a smart enabled tablet-based station TIS to enable them to sell tickets anywhere on the station. It is not clear if this will be corrected before the closures are implemented. Do the TOCs already know if there is sufficient Wifi capacity / mobile phone signal at stations for staff on the move to use?

The remaining at station TVMs, which will be asked to shoulder a larger retail load, are not always intuitive and can import doubt – even to experienced train travellers. This is largely due to the complexity of fares. We understand cited London and international examples, where staffing and retail changes were deployed to then rely more exclusively on technology, simplified their fares system first. There are issues such as available products being linked only to the location of the TVM being used and unusable for ticketing for future use at other locations. Split tickets are not commonly offered. Many TVMs don't offer collection of advance online purchases. There are some inaccessible TVM locations at the stations, and some weather exposed. TVM accessibility should be a key part of any audit and investment mitigation.

The 'fallback' to purchase tickets on-train may also be impeded from occasions of absence (or even the potential of future sustained absences) of on train staff; or indeed where trains are so busy (full and standing) that any on-train staff cannot facilitate customer retail.

At the EMR 11th July Consultation Stakeholder briefing we were advised that the 'National TOC retail mitigation group' was only established 3 weeks before the public consultation launched. It's good that the need for mitigation is recognised, but the Industry and Government appears to not have the evidence of the required mitigations needed to support the successful implementation (and cost) for these proposals yet.

The proposals to close ticket offices would be more successful for passengers if Industry actions to simplify fares, and improve retail technology across apps, TVMs, and call centres were all to happen first as enablers. We suggest a more graduated transition with at least equivalent staffing levels to today to remain (with universal full TIS access), until such time as the fare system is reformed and technology mitigations are improved.

Risk 4: Harder to access railway

The industry cites the relative volumes of transactions undertaken at the Ticket Offices as 12% nationally. We recognise this 12% will include some passengers who are reticent to transition to alternative retail options simply through choice. However, the 12% also includes those with regular person-to-person needs; those experiencing uncertainty such as tourists; and those who wouldn't normally need extra support but do due to the failure of technology or circumstances – potentially at a time of distress or urgency.

The proportion of tickets bought at ticket offices differs by location. EMR do not provide any of their location specific details, but state their operation exhibits generically fewer than 5% of EMR tickets sold at ticket offices on average³¹. This does not clarify what their sample of station TOs consists of, nor does it offer insight into non-retail TO interactions.

We have already evidenced that in a number of locations in the East Midlands finding staff could be harder than today. As such the proposals could act as a detriment for these prospective passengers, in particular to access the railway as a modal choice. For example, people with sight loss are especially reliant on public transport, and the railway network in particular, to travel and live their lives independently. The roving staff, or TVM, or online alternatives that are being proposed will be inaccessible for many people with sight loss.

Ensuring accessibility to as many groups as possible is maintained or improved provides wider regional benefits of decongestion on other modes, reduced assistance costs in the wider economy, increased operational revenues, greater labour force participation, greater social participation and reduced isolation, community, and health problems.

Any increased reliance by TOCs on digital retail due to eroding physical alternatives serves to exclude some of the most vulnerable people. Over 1.7 million households do not have access to the internet³². 2.5 mil people are behind on their broadband bills³³. In 2018 8% of people in the UK (4.3million people) were estimated to have zero basic digital skills³⁴ - circa 8.5% in the East Midlands³⁵. In 2017, 56% of adult internet non-users were disabled, much higher than the proportion of disabled adults in the UK population as a whole; 23.3% of disabled people are not accessing the internet. A quarter of households with income under £25k have no internet access, and 18% of those aged over 65 are without access³⁶. Place can also exclude digital retail options.

³¹ <https://news.eastmidlandsrailway.co.uk/news/national-ticket-office-consultation-launched-emr-asks-for-views-about-plans-to-modernise-customer-service-across-the-rail-network>

³² [https://www.ncfe.org.uk/all-articles/digital-poverty-3-factors-and-how-society-can-tackle-it/#:~:text=Cost%20and%20access,\(10%25%20without%20access\).](https://www.ncfe.org.uk/all-articles/digital-poverty-3-factors-and-how-society-can-tackle-it/#:~:text=Cost%20and%20access,(10%25%20without%20access).)

³³ <https://digitalpovertyalliance.org/>

³⁴

<https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/articles/exploringtheksdigitaldivide/2019-03-04/pdf>

³⁵

<https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/articles/exploringtheksdigitaldivide/2019-03-04/pdf>

³⁶ Ofcom

Poor (or no) broadband and mobile infrastructure is more likely to be experienced in remote, small towns³⁷ which can mean that those in rural areas face the double disadvantage of limited access to physical services as well as those online.

It is regrettable that none of the East Midlands TOCs have published their EQIAs such that the impact can be understood by the public. We are interested to see the evidence that mitigations will comply with the Equalities Act 2010 for all protected characteristics. We understand that the proposals must also evidence compliance with the TOC Accessible Travel Policy assured by the ORR. We strongly encourage that the scope of this assessment is ‘modernised’ in order to start from when prospective customers are trying to buy a ticket – not after the ticket has been bought.

One equalities example we are interested to learn about the mitigations to is the existing rights to ‘walk up and go’ assistance. Our understanding is that this will increasingly be discharged by on train staff. After the launch of the consultation the ORR wrote to TOCs to reaffirm the ORR ATP requirements such as A.1.2f:

"Where an operator may be considering a change to train or station staffing levels, they must have clear measures in place to ensure that passengers who have not booked assistance in advance can still receive it in a safe manner."³⁸

Whilst this additional volume of activity for on train staff may need to be reviewed, we also encourage improvements to the pre-booked assistance platforms. In the latest ORR data, only 81% received all of the assistance types that they booked, and only 84% were met within an acceptable time. 25% of prospective assistance passengers booking within two hours of travelling were not receiving a confirmation of their booking³⁹. There is also just a 51% success rate for disabled people using at station Call Help Points to successfully receive their assistance⁴⁰.

Examples of other considerations which will have to be audited on a location-by-location basis could include:

- Ensuring access to critical infrastructure remains operational when unstaffed, such as lifts and toilets (Note GTR and Southern have only committed to ‘review’ this). Somewhere like Long Eaton has impractical alternatives; to preserve equality of access to today - the lifts really must operate with a 100% success rate if unstaffed⁴¹.
- The location of the TVM and ensuring the TVMs are fully accessible and free from weather and glare. Hinckley, Melton Mowbray, Oakham, Stamford and Spalding are examples of stations proposed for TO Closure that are listed as having inaccessible TVMs⁴².

³⁷ CAS, 2018

³⁸ <https://www.orr.gov.uk/sites/default/files/2023-07/2023-07-05-letter-to-operators-about-station-ticket-office-proposals-and-atps.pdf>

³⁹ <https://www.orr.gov.uk/sites/default/files/2023-07/2022-2023-passenger-assist-report-by-mel.pdf>

⁴⁰ <https://www.orr.gov.uk/sites/default/files/2022-07/accessible-travel-policy-implementation-review-july-2022.pdf>

⁴¹ [https://www.nottinghampost.com/news/local-news/concerns-over-future-long-eaton-](https://www.nottinghampost.com/news/local-news/concerns-over-future-long-eaton-8601258?utm_source=mynewsassistant.com&utm_medium=referral&utm_campaign=embedded_search_item_desktop)

[8601258?utm_source=mynewsassistant.com&utm_medium=referral&utm_campaign=embedded_search_item_desktop](https://www.nottinghampost.com/news/local-news/concerns-over-future-long-eaton-8601258?utm_source=mynewsassistant.com&utm_medium=referral&utm_campaign=embedded_search_item_desktop)

⁴² (Melton Mowbray Example) <https://www.eastmidlandsrailway.co.uk/trains-stations/at-the-station/station-facilities/mmo>

- Clear ‘one railway’ customer facing codes of practice when stations are to be staffed by NR at stations only such as for barrow crossings at places like Bottesford, Stamford, or Sleaford.
- Mitigations to the potential impediments to those with uncertainty about their travel plans such as tourists from the lack of staff at stations and lack of a fixed location Ticket Office. The East Midlands has the lowest percentage of people using public transport to commute, and with 70% of journeys outwith the regions boundaries⁴³ it suggests a high relative prevalence of non-repeatable trips and an increased potential for complexity and bespoke needs where solutions offered to customers directly by staff are hard if not impossible to replicate via the phone or call centre assistance point. Long Eaton and Sleaford are listed as having no call help point⁴⁴.
- For Northern Trains only 9 TVMs accept cash⁴⁵ (with the rest card only). Buxton TVMs are card only and is also where 28% of transactions at the station were non-card transactions. Where machines do not accept cash, Northern Trains propose a ‘promise to pay’ machine ticket to then exchange to pay in cash onboard....is this to be common to all TOCs? What’s stopping all users doing this to get through barriers and chancing whether or not they will face payment....what if a large proportion of the train decide to use this method given there could be an incentive to do so....?
- How will passengers get advice during disruption during times that a station is to be unstaffed? There are Customer Information Screens and Call Points, but the data they receive during significant disruption is often unreliable and arm’s length will not offer the assurance needed. This point gets exacerbated if performance is anticipated to get worse in the years ahead (see Network Rails CP7 performance forecast for asset failures⁴⁶).

Accessibility issues will continue to become more complex as our understanding of people’s needs increase. Accessibility is diverse which needs regular, meaningful, expert, and user-led reviews of the rail offer, to accurately shape the minimum standard criteria. In the round we suggest Transport Focus to propose that an authority (in lieu of GBR being setup) takes a wholistic view of the proposals. There is the possibility of creating Ticket Office ‘deserts’ such that travel to a remaining TO for any of the reasons to do with inaccessible products or equalities accessibility is prohibitive for a number of communities (communities from the East Coast Mainline out to the east coast itself look most exposed, as does the area from Ashfield to Worksop). The TOCs should be enabled to work with Stakeholders to reconsider their plans, and to improve the breadth of the future TO network to enable sufficient reach across region beyond that which is currently proposed.

The proposals to de-staff may also make it harder than today to access public transport generally. The in-person support to advise on interchange and multimodal wayfinding (such as to onward bus connections or active options) could be eroded. This is particularly prevalent at the medium-larger stations in the East Midlands where many journeys require an individual rail leg as only one leg of an

⁴³ <https://dataportal.orr.gov.uk/media/2178/regional-rail-usage-apr-2021-mar-2022.pdf>

⁴⁴ (Long Eaton Example) <https://www.eastmidlandsrailway.co.uk/trains-stations/at-the-station/station-facilities/lge>

⁴⁵ <https://www.northernrailway.co.uk/sites/default/files/2023-07/Station%20Reform%20120723.pdf>

⁴⁶ <https://www.networkrail.co.uk/who-we-are/publications-and-resources/control-period-7-strategic-business-plans/>

overall journey. Making interchange worse in the East Midlands is particularly impactful given the current rail provision and rail reach, which is relatively limited compared to other regions.

Risk 5: Perceived less secure railway

A sister issue to the concerns we have on future accessibility is the future prospects for security at stations. At the EMR Stakeholder briefing on 11th July we learned that "more security incidents occur at staffed stations". This may be true, but we find it hard to leverage as compelling evidence for de-staffing stations. The statistics may only reflect those where staff were there to see them directly, or where they were reported – thereby missing incidents that go unreported at unstaffed times and unstaffed locations. Regardless, it is the public perception, and the contribution to prevention that are most primary when considering staffing at stations for security.

In London TravelWatch's recent research⁴⁷ on personal security, it was found that visible staff at stations made women, disable people, and other groups of people feel safer when travelling. Passengers reported that in the absence of staff they wouldn't know how to get help in the event of a crime or incident.

We are aware that EMR had CCTV upgrades that were planned within previous franchise business plans which got deferred – these should be accelerated such that CCTV renewals and enhancements can mitigate some of the shortfall at stations which will be increasingly de-staffed. Robust arrangements for increasing practices of skeleton or lone staff working will be essential to review when staffing is reduced – with security concerns for rural 'isolated' stations and urban areas alike, both offering risks to staff and passengers that will require mitigations and learning from existing practice.

⁴⁷ <https://www.londontravelwatch.org.uk/campaigns/personal-security/>

Risk 6: Loss of revenue

TfEM works to collaborate with Government and Industry to progress the shared vision by Local Authorities for a growing railway in the region, and TfEM members believe that policies that seek to increase revenue through investment are superior to cost focused initiatives that risk making the public offer worse and the Industry financial sustainability worse in the medium run. These proposals clearly seek to tackle OPEX cost, but they do not overtly seek to tackle improvement of patronage or revenue. There is a risk that the changes could contribute to a detriment to revenue against the levels of revenue TOCs otherwise could have seen. Transport Focus should recommend seeking some TOC revenue modelling across scenarios for markets and regional networks noting that passenger impacts are not nationally homogeneous, and that an individual station basis of assessment could be too hyperlocal which won't take account of the broader market.

That 12% of transactions nationally are currently via the TO represents a high number of transactions and customers in absolute terms. To change this retail offer so radically is a lot of industry revenue to put at risk. Whilst assuming much of this could simply transfer to alternate retail methods, there is no analysis in the public domain to illustrate what portion of it is likely to be lost in the short term. For case examples, LNER identify (through FOI) that both Grantham and Newark Northgate have a high hourly volume of transactions at their TOs both delivering in excess of 50k of transactions a year⁴⁸. EMR do not provide any of their location specific details, but state their operation exhibits generically fewer than 5% of EMR tickets sold at ticket offices on average⁴⁹. Nationally 12% of TO bookings may represent far higher than that in relative revenue as they could disproportionately reflect a high proportion of TUAG fares or complex fares, and such represent higher than 12% of revenue.

Nor provided is the impact to the financial sustainability of the Industry in the medium run, where, as we have detailed, the proposals could have a detrimental impact to some groups who may increasingly be excluded from rail. The main concern for TfEM is that the overriding mission to reduce the subsidy gap may not be reduced *enough* through these measures in the medium run, and this may lead to even harsher cost focused measures being adopted in the future. Commercially there is no apparent loss or risk to TOCs if the TO closure and de-staffing proposals do not really close the gap overall.

Two associated observations regard yield management and penalty schemes – both income to the Industry:

- Whilst there is not data of this in the public domain, there is anecdotal evidence that TVM use is unable to understand all the nuances of the passenger need and can trigger purchases that are not best value for the customer – in turn delivering higher yields to the TOCs. The

⁴⁸ https://www.whatdotheyknow.com/request/statistics_of_how_many_tickets_h_8#incoming-2217411

⁴⁹ <https://news.eastmidlandsrailway.co.uk/news/national-ticket-office-consultation-launched-emr-asks-for-views-about-plans-to-modernise-customer-service-across-the-rail-network>

ORR evidence that it is only 91% of purchases from TVMs would be considered the ‘most appropriate’ in terms of value or flexibilities⁵⁰. So, with more TVM use, TOCs can extrapolate higher yields either at the TVM or through penalties later down the line. At the margin there may also be an increase in trips (and therefore revenue) from people travelling to major stations that retain their TOs - explicitly for the express purpose to use the TO at that location – so it may be a policy that incentivises some more journeys...

- Finally, these proposals could erode credibility of the current penalty schemes for ticketless travel. If the ticket office closure in question is at a station designated as a Penalty Fares Station for the purposes of any operator’s Penalty Fares Scheme (whether this is the same operator which runs the ticket office, or another operator), that scheme will need to be changed to accommodate sufficient mitigations before the reduced opening hours or closure is implemented. The ‘fallback’ to purchase tickets on-train may also be impeded from occasions of absence (or even the potential of future sustained absences) of on train staff; or indeed where trains are so busy (full and standing) that any on-train staff cannot facilitate customer retail. The process for changing a Penalty Fares Scheme is set out in chapter 8 of the Penalty Fares Guidelines January 2023 produced by RDG.

⁵⁰ <https://www.orr.gov.uk/monitoring-regulation/rail/passengers/tickets-and-fares/ticket-machines>

Risk 7: Unsustainable alternative property uses

We highlighted in a previous section that ensuring access to critical infrastructure when unstaffed, such as to lifts and toilets for accessibility concerns, is critical. But any closure of functional infrastructure at stations to *all users* should also not be a by-product of these proposals. For example, Alfreton should not lose its all-day access to the large, heated waiting room, which will have to be unlocked as and when the station is otherwise unstaffed to achieve this. Reliance on platform canopies is insufficient. GWR consultation materials expressly assure the reader that the proposals do not impact access to related station facilities including toilets, customer information displays, lifts, access to emergency contacts, waiting rooms etc – no such guarantee appears within most other TOC materials.

However, the opportunity for cost savings will be reduced if the accommodation has to remain in use whether it be costs for equipment, maintenance, or energy costs. So many cost savings will be entirely staff headcount related.

Proposals for future use of the Ticket Office cubicles themselves are thin within the consultation materials. LNER do offer what they want to do with the locations:

“We therefore plan to repurpose the Ticket Office at Newark Northgate Station to make it more accessible. Greater space will allow for an accessible meeting point and seating. We’ll also increase the station retail offer.”⁵¹

If commercial alternative uses are found, then that would add to the benefit to the TOCs and DfT of these proposals. However, there is a real risk that the cubicles are not commercial, unable to be meaningfully repurposed, and that the property spaces become redundant, and merely a reminder of a service lost.

⁵¹ <https://www.lner.co.uk/station-changes>

Final remarks

Under clause 6-18 (1) of the TSA, changes to opening hours may be made under the Major Change procedure if:

- (a) the change would represent an improvement on current arrangements in terms of quality of service and/or cost effectiveness and
- (b) members of the public would continue to enjoy widespread and easy access to the purchase of rail products, notwithstanding the change.

Much of our response can be characterised as identifying the uncertainty for the future; it is hard to conclude that the TSA criteria has been evidenced in our region. We identify 7 areas of risk against the promoted areas of opportunity from these changes in our response. The proposal from TOCs to reduce staffed station hours is a more critical to risk to passengers than the stated re-purposing of the Ticket Office cubicles themselves. Will new hours of cumulative staff time at locations erode today's levels by more than 20%? 50%? 75%?

Our recommendations are to:

- 1) Publish equal and equivalent data for all regions and stations.
- 2) Transparently categorise the vast number of affected stations with detailed evidence. This must include a regional assessment, as a national exercise would almost certainly disadvantage areas like the East Midlands. A number of the locations appear strategic to the regions network and economic population catchments that could warrant a strategic revision of their categorisations beyond what they are planned to offer - whether it be TO functionality or staffing coverage/levels.
- 3) Publish the assessment of markets and regional networks in terms of medium-term costs and revenue impacts.
- 4) Modernise the simplicity of the fares and ticketing system first before the retail offer is eroded. Also improve retail technology across apps, TVMs, and call centres as enablers. We suggest a more graduated transition than proposed with at least equivalent staffing levels to today to remain (with full TIS access), until such time as the fare system is reformed and technology mitigations are improved.
- 5) Recast the minimum protections that the Schedule 17 of the TSA was designed to protect; but do not discard such regulation. For example, an alternate to mandate TOCs to provide revised station minimum staff levels for minimum hours.
- 6) Monitor the implementation of the changes and confirm what a 'breach' looks like against minimum service levels. The Industry and Government appear to not have the evidence of

the required mitigations needed to support the successful implementation (and cost) for these proposals yet. We propose that an authority (in lieu of GBR being setup) takes a holistic view of the accessibility issues inherent in the proposals. Ensure the scope of the TOC ATP assessments are 'modernised' in order for assessment scope to start from when prospective customers are trying to buy a ticket – not after the ticket has been bought.

- 7) Ensure any closure of functional infrastructure (e.g. toilets, lifts) at stations shall not be a by-product of these proposals.

A concern for TfEM is that the overriding mission to reduce the subsidy gap may not be reduced enough through these measures in the medium run, and this may lead to even harsher cost focused measures in the future. TfEM have repeatedly shared the evidence that the East Midlands is a region with very low rail provision and the lowest recipient of transport investment nationally. ORR data indicates patronage in our region is performing very well⁵², and is revenue to generally at or above industry norms. We also understand that subsidy is orders of magnitude lower in absolute values compared to many other operators⁵³. Given this baseline, that the East Midlands is then being asked to shoulder such customer affecting choices is particularly disappointing. We still think there is time to pivot – and to deliver industry sustainability by growing revenue. In the East Midlands look little further than to rediscover the 2019 EMR franchise promises...

Overall, our response concludes that, based on the information available, **it is not possible to conclude that these measures will result in a net benefit to passengers in the East Midlands, or be likely to increase patronage.**

We will look to work constructively with the Industry and the DfT on whether the cumulative impacts to the region can be mitigated, and we offer seven initial suggestions as to how this could be commenced.

On the 14th of July 2023, at the East Midlands Councils Annual General Meeting, it was confirmed that Councillor Martin Hill OBE (Chair of EMC and Leader of Lincolnshire CC) and Sir Peter Soulsby (Chair of TfEM and City Mayor of Leicester) would jointly write to DfT Ministers to relay the shared consensus of the regions leaders. This technical consultation response will act as an annexe to that cover letter.

Yours sincerely,

Kyle William Butterworth
Head of Rail Improvement
East Midlands Councils

⁵² <https://dataportal.orr.gov.uk/media/2207/passenger-rail-usage-jan-mar-2023.pdf>

⁵³ (Lower than GTR, GWR, WMT, XC, Scotrail, TFW, SER, Northern) <https://dataportal.orr.gov.uk/statistics/finance/rail-industry-finance/table-7273-government-subsidy-by-franchised-passenger-operator-up-to-2018-19/>

Annexe 1: East Midlands TO Closures (Summarised from TOC Proposal Publications):

Table 1.3

<u>No</u>	<u>Closure Location</u>	<u>Current Ticket Office Hours</u>	<u>Proposed Station Staffing</u>
1	Northampton	Monday to Friday: 06:00 - 21:00 Saturday: 06:00 - 21:00 Sunday: 06:45 - 20:00	Staff will be available throughout the week
2	Long Buckby	Monday to Friday: 06:15 - 11:00 Saturday to Sunday: Closed	Mobile teams will be deployed here on a flexible basis
3	Corby	06:30 - 13:00 Mon-Fri 09:00 - 15:00 Sat 08:00 - 15:00 Sun	The station will be staffed between 0600 - 1300
4	Kettering	06:00 - 20:30 Mon-Sat 08:00 - 21:00 Sun	The station will be staffed between 0600 - 2300 to fulfil any customer service requirements
5	Wellingborough	06:10 - 22:15 Mon-Sat 07:45 - 22:15 Sun	The station will be staffed between 0600 - 2300
6	Hinckley	06:40 - 13:00 Mon-Sat Closed Sun	Weekly visits
7	Loughborough	06:00 - 19:00 Mon-Sat 08:15 - 21:00 Sun	The station will be staffed between 0600 - 2300
8	Market Harborough	06:00 - 19:00 Mon-Sat 08:30 - 19:30 Sun	The station will be staffed between 0600 - 2300
9	Melton	06:45 - 13:40 Mon-Sat Closed Sun	Weekly visits
10	Narborough	06:40 - 13:00 Mon-Sat Closed Sun	Weekly visits
11	Beeston	06:10 - 19:45 Mon-Sat 10:00 - 17:00 Sun	Daily visits
12	EMP	06:00 - 19:30 Mon-Sat 07:30 - 19:30 Sun	The station will be staffed between 0600 - 2300
13	Mansfield	06:00 - 12:45 Mon-Sat Closed Sun	Weekly visits
14	Newark C	06:00 - 19:15 Mon-Fri 07:15 - 16:15 Sat Closed Sun	Daily visits
15	NNG	Travel centre opening hours Monday – Friday 05:45 - 16:00 Saturday 08:00 - 16:00 Sunday 08:45 - 16:00	Station will be open and staffed from the first to the last train.

16	Retford	Travel centre opening hours Monday – Friday 06:00 - 13:00 Saturday 06:00 - 13:00 Sunday 08:20 - 13:00	Station will be open and staffed from the first to the last train.
17	Worksop	Mon-Fri 0700-1700, Sat 0700-1330, Sun Closed	Mon-Fri 07.00-12.00 Sat 08.00-13.00 Sun nil
18	Alfreton	06:45 - 18:00 Mon-Sat 10:30 - 18:30 Sun	Daily visits
19	Chesterfield	05:15 - 19:00 Mon-Fri 06:15 - 18:00 Sat 08:30 - 21:00 Sun	The station will be staffed between 0600 - 2300
20	Long Eaton	06:05 - 17:30 Mon-Sat 08:45 - 16:05 Sun	Daily visits
21	Buxton	Mon-Sat 0550-2000 Sun 0815-2230	Mon-Sat 0600-1800 Sun 0900-1700
22	Whaley Bridge	Mon-Sat 0650-1320 Sun Closed	Mon-Fri 12.00-14.00 Sat 09.00-11.00 Sun Nil
23	New Mills C	Mon-Fri 0635-1305 Sat-Sun Closed	Mon-Fri 0930-11.30, Sat-Sun Nil
24	New Mills NT	Mon-Fri 0640-13.10 Sat-Sun Closed	Mon-Fri 0930-1130, Sat-Sun Nil
25	Dinting	Mon-Fri 0630-1300 Sat-Sun Closed	Mon-Fri 0930-1130, Sat-Sun Nil
26	Hadfield	Mon-Fri 0555-1910 Sat 0625-1940, Sun Closed	Mon-Fri 0700-10.30, Sat 1000-13.30, Sun Nil
27	Boston	07:40 - 15:20 Mon-Sat Closed Sun	Daily visits
28	Skegness	07:55 - 16:30 Mon-Sat Closed Sun	Weekly visits
29	Spalding	06:30 - 12:30 Mon-Sat Closed Sun	Weekly visits
30	Stamford	06:20 - 13:20 Mon-Sat 11:45 - 18:30 Sun	Weekly visits
31	Sleaford	07:30 - 13:30 Mon-Sat Closed Sun	Weekly visits
32	Grantham	Travel centre opening hours Monday – Friday 06:45 - 15:30 Saturday 08:00 - 15:00 Sunday 09:00 - 15:00	Station will be open and staffed from the first to the last train.

33	Oakham	06:30 - 14:15 Mon-Fri 07:30- 13:45 Sat Closed Sun	Weekly visits
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Annexe 2: East Midlands Open TO Changes Summarised from TOC Proposal

Publications:

Table 1.4

No	TO Location	Current Opening Hours	Future Opening Hours
34	Derby	04:55 - 22:45 Mon-Sat 06:20 - 23:00 Sun	06:00 - 22:00 Mon-Sat 07:00 - 22:00 Sun the station will still be staffed 24/7.
35	Glossop	Mon-Sat 06.25-19.40 Sun - 10.00 - 17.30	Mon-Sat 06.00 - 18.00 Sun 09.00-17.00
36	Leicester	05:20 - 22:30 Mon-Sat 07:15 - 22:30 Sun	06:00 - 22:00 Mon-Sat 07:00 - 22:00 Sun the station will still be staffed 24/7.
37	Lincoln	05:00 - 19:30 Mon-Sat 10:30 - 21:30 Sun	06:00 - 20:30 Mon-Sat 07:00 - 20:30 Sun the station will still be staffed 24/7.
38	Nottingham	05:00 - 22:00 Mon-Sat 07:15 - 22:20 Sun	06:00 - 22:00 Mon-Sat 07:00 - 22:00 Sun the station will still be staffed 24/7.