

West Yorkshire Combined Authority

Draft Consultation Response to Rail Station Ticket Offices and Staffing

West Yorkshire Station Ticket Offices (staffed)

Northern			
Bingley	Garforth	Horsforth	Menston
Bradford Forster Square	Guiseley	Ilkley	New Pudsey
Bradford Interchange	Halifax	Keighley	Shipley (Yorks)
Cross Gates	Hebden Bridge	Leeds	Todmorden

Transpennine Express
Dewsbury
Huddersfield

LNER
Wakefield Westgate

Summary

This response sets out our views regarding the proposals with supporting evidence. This is without prejudice to our position regarding lawfulness of the consultation and any legal challenge we make in this regard.

- WYCA strongly object to the proposed programme of ticket office closures and reductions in staffing hours.
- We oppose consultations due to the inadequate timescale for responses, just 58 days, and the grossly inadequate information provided across almost every area of the consultation which we consider to be unlawful and to impact the most vulnerable
- Our view is that the consultations are legally inadequate, and the process is being carried out in breach of the requirements of s.29 of the Railways Act 2005.
- Station staff are essential if we want our railways to be accessible, safe and inclusive for everyone. The stations with ticket offices planned for closure in West Yorkshire have a combined annual usage of more than 12 million.
- Staffing at West Yorkshire stations is proposed to have 59% reduction in FTE (full-time equivalent) Monday-Saturday, 66% reduction Sunday. 6 of 19 stations currently with a ticket office will no longer have any staff on Sundays.
- The proposal will inevitably result in less people travelling by train at a time when more people need to be encouraged to travel by sustainable modes of

transport to meet climate change targets, tackle congestion and other wider sustainable transport objectives.

- We have an overarching concern that the reduction in staffing hours proposed will increase over time.
- We are concerned that the proposals as they stand would result in reduced usage of rail by passengers and overall loss of revenue, leading to further reductions in service levels and customer care – and in turn impact on economic growth.
- Reduction in station staffing will impact negatively on safety and security.
- We do recognise that the ways travellers use the railway have changed in recent years.
- We are concerned that only 3 of 19 West Yorkshire stations are proposed to retain a ticket office, and Transpennine Express detail that Huddersfield ticket office ‘will close in the future’.
- No evidence has been demonstrated of proper and adequate consideration of the social and equalities impacts of all the proposals. We are concerned that this will have grave impacts on those with protected characteristics and other groups within our communities who are already disadvantaged including people with learning difficulties, anxiety and other mental health conditions.
- The provision of Equality Impact Assessments is incomplete, only 3 of required 19 are complete. The remaining are in a draft format and will not be available to review until after the consultation closing date.
- Staff will no longer have any direct ticket selling ability and will only be able to guide passengers in using self-service machines on the station or online on passengers own mobile device. Passengers, particularly those with protected characteristics may feel uncomfortable and anxious in this type of situation.
- 81 ticket types currently not available on station Ticket Vending Machines.
- Not all station Ticket Vending Machines are accessible, including not accepting cash.
- Clarification is required on the future operation of waiting rooms and toilets provided within ticket offices or in buildings adjacent to them which are currently opened and closed by existing ticket office staff. Ticket offices also have available bus information, timetables, vending machines and other facilities for passengers which will be lost without the use of ticket office buildings.

Outline

We write as Mayor of West Yorkshire and as Chair of the West Yorkshire Combined Authority's Transport Committee (and Leader of Bradford Council) in response to this consultation. We have already expressed in a letter to Rt Hon Mark Harper MP, Secretary of State for Transport on 07 July 2023 our grave concerns about this consultation that was launched into proposed radical cutbacks in the provision of station ticket offices and staffing across the North, and especially in West Yorkshire.

We are disappointed that the consultation has not been suspended as we consider it to be fundamentally flawed and unacceptable given the initial three-week consultation period timed at the height of the summer holiday season. Despite the time extension to eight-weeks, this is wholly inadequate. This has also been impacted by critical information from operators arriving later during the first week, operators notifying us of errors in consultation documents as late as 14 July 2023 and Equality Impact Assessments finally being made available by Northern but only in draft form. Each train operator has developed their consultation information separately which has created a number of anomalies across the information made available.

Train Operating Companies (TOCs) operating in West Yorkshire have launched these consultations, without identifying their legal effect or provenance, and have included proposals to permanently close a number of ticket offices. It is our view that the consultations are legally inadequate, and the process is being carried out in breach of the requirements of s.29 of the Railways Act 2005 because:

- a. the proposal was for TOCs, as operators of stations, to discontinue the use of a part of some stations, namely the ticket office;
- b. the ticket offices have, in the preceding five years, been used in connection with the provision of services for the carriage of passengers by railway;
- c. the ticket offices were not secured within the meaning of s 45(1) of the Railways Act 2005;
- d. the ticket offices were not excluded from the application of s 29 of the Railways Act 2005 by an order under s 38;
- e. the closure of the ticket offices was not a "minor modification" within the meaning of s 34 of the Railways Act 2005;
- f. there had been no compliance with s 29(3), (4) or (5) of the Railways Act 2005 (entitled "Proposal by operator to close station"); and
- g. so far as the Consultation is concerned:
 1. TOCs have failed to publish impact assessment for the purposes of the Equality Act 2010, either in full or within the entire period of the consultation; and/or
 2. the information provided as part of the consultation is otherwise inadequate

We therefore provide this response to the consultations without prejudice to our position regarding the lawfulness of the consultation and any legal challenge we make in this regard.

By suspending the consultation, a more fit-for-purpose alternative could have been agreed. We believe that the process needs to have involved all partners (and wider stakeholders such as user groups) throughout, with Combined Authorities taking a key role in their areas, and in the case of the North be a process run jointly with (or led by) Transport for the North (TfN). We believe it would have been sensible for this process to take 6-12 months, with no decisions made on specific stations' staffing arrangements until it had been concluded.

In pressing these proposals forward, Government appears to have ignored the existing work which has been carried out and the role of TfN, and the wider spirit of devolution: a more top-down approach could not be imagined.

Our concerns relate as much to the substance of what is proposed as to the consultation itself.

The information provided was initially grossly inadequate across almost every area, including details of what future arrangements are proposed (hours/days, staffing numbers), what physical works are intended to enable the proposed changes, what transitional arrangements would be put in place, supporting data in terms of station usage and ticket sales, proposals for products currently only available from staffed stations. It should be noted that rail journeys are by definition two-ended, and many journeys are to or from locations outside West Yorkshire – we therefore need to know how the situation at the “other end” stations will be reflected in key cross-boundary journeys.

Vulnerable users without internet capabilities will be put off from accessing the railway. The impact on users with protected characteristics under the Equality Act is likely to be significant, and requires commensurate mitigation measures to make the proposals acceptable. Equality Impact Assessments are considered to be an important part of the consultation; initially only 2 out of 19 were made available. This number has been increased subsequently but all are in draft form and we are told that they will remain incomplete until after the consultation is over.

We would emphasise that we fully recognise that the ways in which travellers use the railway has changed in recent years, and will continue to do so, with traditional over the-counter purchases of tickets having declined. Along with our colleagues in TfN and beyond, we see this as a real opportunity to improve the passenger experience, as well as making the railway more efficient, by optimising ways in which staff presence is provided at our stations. Developing a concept to do this, however, means progressing with the work that is already underway on key themes like ‘Stations As A Place’ (focusing on what the function of stations should be within their varying communities, and how they should best fulfil that), as well as, crucially, on ticketing and fares reform, including the roll-out of the long-promised Pay-As-You-Go ticketing in the North, as well as considering new ways in which travel can be retailed. Until the ticketing and fares reforms are introduced, large scale ticket office

closures would be inappropriate, particularly as the ticket machines do not always make it easy for passengers to get the best value fare and do not all accept cash which is still vital for many people. With regard to the proposals themselves, we must emphasise that the amount of detail given is grossly inadequate and therefore we cannot comment comprehensively. However, the information provided demonstrates that the planned changes are wholly unacceptable and must not proceed.

Station Staffing

While consultees have been left in the dark as to what considerations are material for the purposes of this consultation, the proposals are so extreme in their scale and impact that they are plainly led purely by the desire to cut costs. With almost 85% of West Yorkshire's ticket offices closing, only 3 of the 69 stations in West Yorkshire would retain ticket offices (even LNER's Wakefield Westgate, with a footfall of around 2 million per year, would lose its office, and Transpennine Express detail that Huddersfield ticket office 'will close in the future') plus radically reduced opening hours at the three remaining ticket offices and the remainder of stations losing staff coverage of any type for much of the day. The stations with ticket offices planned for closure in West Yorkshire have a combined usage of more than 12 million. Station staff are essential to ensure our railways are accessible, safe and inclusive for everyone. They offer advice, guidance – and sometimes, simply a friendly face to people who may already be socially excluded. The proposed changes indicate a 59% reduction in the number of FTE (full-time equivalent) employees Monday-Saturday and 66% reduction on Sunday, including 6 stations that will no longer have any staff on a Sunday (percentage data excludes Wakefield Westgate, LNER request submission of a Freedom of Information request for any information not contained in their 'Station Reform' document).

The proposals for staff highlight how they will be more accessible in their new roles however having passengers roaming through the station trying to find staff is not only inconvenient but another issue to overcome for those with protected characteristics. Many blind, visually impaired and people with disabilities for example rely upon a ticket office as their first point of contact. Consideration needs to be given to having signposted identifiable location points at each station to make it easier for passengers to be able to locate staff. Passengers could also be searching for staff when they are on designated rest breaks. It is unclear how staffing levels work at locations with multiple platforms – how does one member of staff deal with two platforms (or more at Bradford Forster Square and Shipley) and multiple entry/exit points.

It would appear premature to implement these changes at a time when it is apparent the rail sector is experiencing service reliability issues that are severe on some routes and due to several factors in the aftermath of the pandemic. This is in addition to planned and unplanned engineering works, adding network disruption, all factors that erode customer confidence to travel. At such times availability of good customer service is vital.

Ticket offices play an important role in supporting the emerging dominant leisure market which has been building post-covid as evidenced by LNER. It can be

assumed that leisure travel requires increased customer support as the journeys are likely to be unfamiliar and longer distance.

Clarification is needed as to the role of existing ticket office staff performing duties to open and close station waiting facilities and toilets as it is not acceptable for these much-needed station facilities to be unavailable to passengers.

This is underlined yet further by the proposals second-guessing and undermining the work referred to above regarding the future role of stations and how they should be staffed, and their wider services provided, as well as questions of fares, ticketing and retail reform. It is unacceptable to prepare these proposals in isolation from those vital themes.

There appears to be no indication as to what would happen to the highly skilled and experienced staff currently on stations, who are badly needed on the railway.

Equality & Accessibility

While it is impossible to make properly informed observations without knowing to what end this consultation is actually directed, there is no evidence of proper and adequate consideration of the social and equalities impacts of all the proposals. This in itself constitutes a fundamental flaw, and indeed a failure to carry out and publish completed Equality Impact Assessments (EqIA) ahead of the consultation renders the legality of the proposals questionable (as referred to above only 3 completed EqIAs are available for stations in West Yorkshire the remaining are in draft form only). It seems clear that the impacts of the proposals as they stand – and as proposed to be imposed in isolation from any wider strategy to consider how station services are provided – would have grave impacts on those with protected characteristics and other groups within our communities who are already disadvantaged, including:

- (a) People with disabilities – who are disproportionately reliant on ticket offices;
- (b) Women; the young; the elderly; Black, Asian and minoritised communities; the LGBT community; and other minority groups who are disproportionately likely to face personal safety issues.
- (c) The economically disadvantaged and socially included, such as those without bank accounts, without full or any access to the internet, and/or without smartphones.
- (d) People with learning difficulties, anxiety and other mental health conditions who would be adversely affected by closure of the ticket offices and not being able to find staff.

The ticket office is a clear and obvious first point of contact. No information has been provided about where assistance staff are proposed to be located and how customers will be directed to access the services they will provide. Clear and obvious direction to a permanent point of access will be essential at every station. This needs to also consider people with disabilities who will find it difficult to travel further through a station to locate staff, those blind or visually impaired will struggle to identify who is a member of staff without a fixed designated point and deaf people

will not have the benefit of hearing induction loops. It has not been made clear what training station staff will have.

Potential mitigations identified in the Equality Impact Assessments to assist passengers with protected characteristics, for example step-free access and accessible ticket machines at some stations are subject to survey and funding being secured. No timescale for delivery is given and therefore it is concerning how these mitigations can be provided.

Handrails with braille signage already exist at some stations to aid wayfinding which may need to be amended. We are jointly working with Northern on their 'Accessibility and Inclusivity for All' project which includes installation of braille signage. Any changes will need to be factored into the project which will likely incur additional costs or result in abortive work.

As a result, the proposals potentially constitute the greatest retrograde step in modern times as regards the accessibility and social inclusivity of our transport network, running counter to our national and West Yorkshire commitments to reduce crime and focus on the safety of women and girls.

Ticketing and added assistance to passengers

The railways fare structure is extremely complicated and as such the proposals are detrimental particularly to those that rely on additional support to purchase a ticket and get the most appropriate value-for-money one for their journey, often saving money through split tickets as a result of the ticket office staff's extensive knowledge.

Staff will no longer have any direct ticket selling ability and will only be able to guide passengers in using self-service machines on the station or online on passengers own mobile device. Passengers, particularly those with protected characteristics may feel uncomfortable and anxious in this type of situation.

Ticket office staff tend to be knowledgeable in bus connections, the reduction in staffing hours will impact adversely here. Integration between bus and rail is seen as key to driving modal shift from the private car.

There are no details as to whether stations will receive additional Ticket Vending Machines (TVMs).

We are aware that currently ticket machines at stations do not sell all ticket types with Northern reporting that 81 are not available and that many machines do not accept cash. Not all passengers will be able to apply discounts to tickets bought on machines. We still have examples of stations with only 1 ticket machine available. Ticket machines need to be available, accessible and well signposted (including in braille) on all station platforms with consideration given to all entry and exit points. Even with a good coverage of ticket machines there are many people with disabilities that find them inaccessible and unable to use them. The reliability of ticket machines is also concerning and general maintenance to ensure they are kept in operation needs to be improved.

A reduction in ticket office hours will inevitably result in a greater proportion of assistance to be provided by on board staff, which could in turn impact on their other duties which are safety critical in nature and potentially impart delay into a journey.

Cash paying passengers at stations with a cashless ticket machine will only have the option of buying a ticket on-board trains from a conductor as part of the proposed changes, providing they get a 'Promise to Pay' ticket from a ticket machine before they board. This will cause inconvenience to passengers and would require prominent instructions to be provided at stations informing passengers of the 'Promise to Pay' procedure.

The ability to purchase a ticket online is also affected by a lack of or poor connectivity in rural locations.

There are a several 'closed' stations in West Yorkshire, where automatic barriers are in place where tickets are required to gain access to the platforms. These include, for example, Dewsbury and Wakefield Westgate. If the proposal is to redeploy staff to assist customers on the platform, then customers will not be able to access this area unless they already have a ticket. The most logical place for staff to assist customers and sell tickets is in the current station ticket offices, which means busy concourses/platforms will not be clogged unnecessarily and tickets can be purchased ahead of the barriers.

We understand that development work is taking place for local retail outlets to be able to sell rail tickets (such as convenience stores). Staff at these outlets will require training to ensure they can provide a retail service which is accessible and fit-for-purpose.

The current fares system is well known for its complexity. As part of a fares reform the number of ticket types needs to be simplified, flexible and modernised across all operators. Alongside this, travel patterns are changing including part-time or flexible working and multiple work locations, ticketing needs to cater for everyone offering value-for-money.

West Yorkshire products including MCard will need to be considered to ensure sales of existing products remain available.

Station Facilities & Security

Clarification is required on the future operation of waiting rooms and toilets provided within ticket offices or in buildings adjacent to them which are currently opened and closed by existing ticket office staff. Ticket offices also have available bus information, timetables, vending machines and other facilities for passengers which will be lost without the use of ticket office buildings. The proposed reduction in staffing hours at our stations will impact the availability of these much-needed waiting facilities and arrangements for them to remain available to passengers needs to be supported.

There has been no information provided outlining any plans for the existing ticket office spaces once closed. It is unclear if they will simply be boarded up or repurposed as part of changes. Boarding up ticket offices impacts negatively on passengers feeling safe and secure.

A reduction in the wider station staffing will impact negatively on the safety and security of those travelling by rail, which in some cases will deter passengers from travelling altogether and deter current non-users further from considering rail travel as a journey option. Rail user car parking and cycle parking at stations are often visible from ticket offices and they may appear less secure and therefore less appealing if there aren't staff close by.

We are of the understanding that historically some CCTV was monitored from within the ticket offices by staff and will be seeking assurances that this has been migrated out already to a centralised point.

Maintenance Regime/Penalty Fares

It is important that if more reliance is placed on ticket machines in the future that the maintenance of these needs to improve to be more reliable and systems/process that link into this, such as penalty fares, are fair and transparent for passengers and considered with the changes.

Similarly help points are likely to be accessed more frequently so the maintenance of these and suitable staffing levels to answer the calls needs to be considered. Signage to them needs to be improved including accessibility requirements.

Appendix 1

West Yorkshire Rail Station Ticket Offices						Reduction in FTEs (full-time equivalent)			Equality Impact Assessment Available
Station	District	Operator	Annual Station Usage (ORR)	Ticket office	Staffing	Mon-Fri	Sat	Sun	
Bingley	Bradford	Northern	806,822	Close	On station - reduced hours	0	0	0	Draft only, (not available at start of consultation)
Bradford Forster Square	Bradford	Northern	1,301,266	Close	On station - reduced hours	-1.5	-1.5	0	Draft only, (not available at start of consultation)
Bradford Interchange	Bradford	Northern	1,762,388	Open	Reduction in ticket office times	-3	-3	-3	Draft only, (not available at start of consultation)
Ilkley	Bradford	Northern	936,760	Close	On station - reduced hours	-1.5	-1	-1	Draft only, (not available at start of consultation)
Keighley	Bradford	Northern	1,150,000	Close	On station - reduced hours	-2	-2	-2	Draft only, (not available at start of consultation)
Menston	Bradford	Northern	440,956	Close	On station - reduced hours	-1.29	-1.29	-1	Draft only, (not available at start of consultation)
Shipley (Yorks)	Bradford	Northern	1,004,806	Close	On station - reduced hours	-1.5	-1.5	-0.5	Draft only, (not available at start of consultation)
Halifax	Calderdale	Northern	1,165,010	Close	On station - reduced hours	-3	-3	-2	Draft only, (not available at start of consultation)
Hebden Bridge	Calderdale	Northern	569,720	Close	On station - reduced hours	-1	-1	-1	Draft only, (not available at start of consultation)
Todmorden	Calderdale	Northern	431,194	Close	On station - reduced hours	-1.43	-1.43	-1	Draft only, (not available at start of consultation)
Dewsbury	Kirklees	TPE	1,061,344	Close	On station - reduced hours	-2	-2	-2	Yes
Huddersfield	Kirklees	TPE	3,041,816	Open	Reduction in ticket office times	-2	-2	-1	Yes
Cross Gates	Leeds	Northern	311,984	Close	On station - reduced hours	-0.5	-0.5	0	Draft only, (not available at start of consultation)
Garforth	Leeds	Northern	344,700	Close	On station - reduced hours	-0.5	-0.5	0	Draft only, (not available at start of consultation)
Guiseley	Leeds	Northern	710,682	Close	On station - reduced hours	-2	-2	-1	Draft only, (not available at start of consultation)
Horsforth	Leeds	Northern	560,662	Close	On station - reduced hours	-1	-1	-0.5	Draft only, (not available at start of consultation)
Leeds	Leeds	Northern	19,263,472	Open	Reduction in ticket office times	-12	-12	-7	Draft only, (not available at start of consultation)
New Pudsey	Leeds	Northern	401,868	Close	On station - reduced hours	-1.29	-1.29	0	Draft only, (not available at start of consultation)
Wakefield Westgate	Wakefield	LNER	1,789,788	Close	On station - First to last train	No data made available			Yes, (not available at start of consultation)
						-38	-37	-23	