

# **Great Western Railway's proposed changes to ticket offices: Transport Focus response**

Proposed changes to Schedule 17 of the Ticketing and Settlement Agreement

## 1. Introduction

This is Transport Focus's formal response to your proposal to change ticket office opening hours at regulated stations. It outlines responses received during the public consultation which began on 5 July 2023 and then sets out Transport Focus's conclusions.

Transport Focus recognises that the way many passengers buy their ticket has changed, with increasing numbers choosing to buy online, use apps or Pay As You Go contactless payment. We accept that this has changed the nature of retailing at stations – with stations now only accounting for around 12 per cent of sales on average.

We acknowledge that the proposal was designed to respond to this shift in customer behaviour, with the aim of bringing staff out from ticket offices to better meet customer needs. It is important to stress that Transport Focus is not against the principle of 'bringing staff out from behind the glass'. Our conclusions below are based solely on the specific proposals received for each station and the potential impact on passengers.

## 2. Executive summary

GWR published details of its original proposal on 5 July. The public consultation on this ran until 1 September. Transport Focus received 57,825 representations objecting to GWR's proposal and 100 representations supporting GWR's proposal.

Transport Focus used information provided by GWR and the issues raised by passengers to analyse proposals. We based our assessment on the impact of the proposals on quality of service for passengers, however we acknowledge that cost effectiveness is also part of the criteria. Our focus has been on ensuring that passengers retain access to core products and services at stations rather than the cost of delivery, but we recognise that there could be efficiency savings within proposals.

On 6 September we raised concerns with the proposals and asked a number of clarification questions based on our initial analysis and from the main themes seen in

the public responses at that point. Your response proposed some enhancements to the original proposal.

Transport Focus acknowledges that GWR has made significant improvements to its original proposal. Your specific station proposals meet many of the criteria set by Transport Focus around staffing and access to products and services. However, we still have a number of industry-wide generic issues which give continued cause for concern. These are specific to all operators and, while we are willing to continue engaging with the industry on these, they have not yet been resolved. As a result, we must object to proposals at **all** stations. A full list of stations is provided at the end of this letter.

#### The main reasons for this are:

Welcome Points

In response to concerns GWR proposed that 'Welcome Points' will be developed at stations as an initial focal point that provides any customer who needs support and/or advice a place to start their journey. We think there is merit in this idea but there is much that still needs to be developed.

Welcome Points were not explained as part of the original consultation, so passengers have not had the opportunity to comment on these plans or to highlight potential concerns. We believe it is important that there is further engagement with the Disabled Persons Transport Advisory Committee (DPTAC) and with disabled people and representative groups on the concept, design and implementation of Welcome Points. We also believe they should be piloted/trialled to establish what works best at different types of stations and to gather passenger feedback.

Queuing standards at Ticket Vending Machines
We believe that there is a need for a nationally agreed, and enforceable,
queuing time metric for Ticket Vending Machines (TVMs). This could be
based on the existing standards at ticket office windows (three minutes in the
off-peak and five minutes in the peak). This would create a formal review
mechanism – if queues exceed the targets then action would need to be
taken.

There are a number of assumptions when it comes to future retailing – around for example, the number of people who will migrate to digital channels, how many will move to TVMs, that TVMs can absorb future demand. A robust queuing time regime (with enforcement) will help provide reassurance and safeguards should industry forecasts not be correct.

Retail capacity
 In addition to these generic issues we have concerns over the ability of the following stations to cope with sales demand at high-peak periods:
 Barnstaple, Bridgewater, Bristol Parkway, Didcot parkway, Maidenhead, Reading, Swindon and Twyford.

## 3. The process

The procedure for making a major change to ticket office opening hours is set out in clause 6-18 of the <u>Ticketing and Settlement Agreement</u> (TSA). This requires a train company to post details of the change at affected stations and to invite people to send representations to Transport Focus (or to London TravelWatch if the station is based in its operating area). Transport Focus analyses these responses and uses them to help inform its decision on whether to object to the proposals for stations in its operating area.

The public consultation began on 5 July and was originally scheduled to end on 26 July, 21 days being the consultation period specified in the TSA. 13 train companies announced their plans simultaneously, of which 12 had stations in Transport Focus's operating area, the exception being Southeastern.

The consultation process was challenged, especially over whether people (and especially disabled people) had adequate information on which to comment. We note that train companies subsequently made proposals available in alternative formats and published Equality Impact Assessments. We had written to each train company requesting they make this information available. The consultation period was also extended by the train companies to 1 September, giving people longer to respond. Under the terms of the process set out in the TSA a nil response on the part of Transport Focus is deemed to be acceptance of the proposals. Therefore we continued with our role in the process as written

Transport Focus was originally due to respond on 30 August but, when the consultation period was extended, this moved to 6 October. Due to the unprecedented volume of responses to the consultation this date was subsequently extended again, until 31 October, to allow enough time to process and analyse responses.

## 4. Responses to the consultation

During the consultation period we received 585,178 responses by email, webform, freepost and phone. Some were specific to individual stations, some were specific to train companies as a whole and some were at a network-wide, in other words,

objecting to the proposals by all train companies. In addition, we also received a total of 257 petitions.

There were two specific campaigns launched which generated a large number of responses; one by the RMT union which involved emails and 'postcards', and another via the workers' rights network, Organise, which was via email. While the majority of these responses followed a standard template some had been customised. All have been counted and any that have been customised or contain reference to a specific station identified.

We received 57,825 objections to GWR's proposals.

The top three themes in responses were concerns over the ability to buy tickets in future (including difficulties in using TVMs), the provision of information needed to plan journeys (including during periods of disruption) and how passengers requiring assistance would receive help and support. The common theme running throughout responses was the role, and value, of staff in delivering all of these.

In addition, we received 93,185 network-wide objections opposing changes across all stations.

We also received many responses from stakeholders including MPs, local authorities and representative organisations.

More detail can be found in Annex 1.

We also received 100 representations supporting GWR's proposal to close ticket offices out of a total of 721 nationally.

It is important to note that these are the number of *responses* to the consultation and *not* the number of people who responded. Under the TSA the train companies were, in effect, seeking views on each station in their area – it was not a national consultation. Some people sent objections for individual stations, others sent a reply to each train company objecting to all stations in their area.

## 5. Criteria for assessment

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, notwithstanding the change.

Transport Focus may object to a proposal on the grounds that the change does not meet one or both of the criteria above. If we object, the train company can either withdraw their proposal or refer it to the Secretary of State for a decision. The Department for Transport has previously published <u>guidance</u> setting out the approach the Secretary of State (SofS) would take in these circumstances. This <u>guidance</u> states that the SofS is "content for Transport Focus and the Operator to continue discussing the proposal, including amending it, if that would enable an agreement to be reached. If the matter is referred to the SofS, the SofS will decide whether the objections are valid or not; i.e. the proposed change fails to meet the criteria, or meets the criteria. Alternatively, the procedure permits an arbitrator to be appointed to determine if the criteria are met."

At the same time the consultation was launched, to provide transparency on our role in the process, Transport Focus published its own <u>criteria</u> (which contain many of the same themes set out in the Secretary of State's guidance document). They covered:

- Passengers can easily buy the right ticket for the journey they want to make.
  This included the product range available at the station, what support is
  available to advise/help with a purchase and access for people who need to
  use cash or do not have a smartphone.
- Passengers requiring assistance to travel receive that assistance in a timely and reliable manner.
  - This included arrangements for providing booked assistance (using the Passenger Assist process), assistance provided on a 'turn-up-and-go' basis, the support available when buying a ticket and the ease of requesting assistance.
- Passengers can get the information they require to plan and make a journey, including during periods of disruption.
  - This included the information channels available at the station and the support available to help passengers who need assistance.
- Passengers feel safe at a station.
   This included perceptions of personal security and how train companies will provide reassurance for passengers wanting to travel.
- Passengers are not penalised if they cannot buy the ticket they require from the station.
  - This included arrangements for issuing Penalty Fares or prosecutions for fare evasion.
- Passengers can continue to use facilities at a station.
   This included access to facilities such as waiting rooms, toilets, lifts and car parking.

Transport Focus made clear it would focus its assessment on the impact of the proposals on quality of service for passengers, however we acknowledge that cost effectiveness is also part of the formal criteria. Transport Focus has not received details on cost effectiveness or cost savings from train companies. Our focus has been on ensuring that passengers retain access to core products and services at stations rather than the cost of delivery, but we recognise that there could be efficiency savings within proposals.

Our published criteria also highlighted that the presence of staff at a station plays a key role in the railway meeting passengers' expectations in many of these areas, so station staffing would be a key consideration in our assessment.

## 6. Our assessment

Transport Focus used information provided by train companies and the issues raised by passengers to analyse proposals against the criteria set out above. On 6 September we wrote to each train company raising concerns with the proposals and asking a number of clarification questions based on our initial analysis and from the main themes seen in the public responses at that point. GWR replied on 27 September. These letters are attached as Annex 2 and 3.

GWR's original proposal was to:

- Alter how tickets are sold at 79 stations and, in addition, change Ticket Office opening hours at 15 of those.
- At the end of an expected transition period of around 12 months, ticket office windows at 69 stations would close, with staff moving to other areas in the station, where they are better placed to help customers.
- During a proposed 18-month period of implementation, some ticket office opening hours at the remaining 10 larger locations would initially be reduced, along with the number of open sales positions. At the end of this period, remaining ticket office windows would also close. These 10 stations principally major stations, interchanges between networks and locations where there are significant numbers of customers needing extra assistance to buy would initially retain a ticket office with qualified staff able to retail tickets and help customers with other non-ticketing issues.
- The proposed changes would not result in locations left unstaffed. However, the proposal would see the creation of muti-skilled roles and some existing ticket office staff would be retrained to provide additional support to customers away from the ticket office including providing help with ticket purchasing. They would not have access to retailing equipment. Instead, passengers would either buy tickets through TVMs, the GWR app, online or on board trains.

Following further discussion with Transport Focus your letter of 27 September made some significant changes to your proposals:

- All stations would now see no change in the staffing hours with retail staffing hours reverting to current times. Therefore, retail-trained staff would be available to assist customers with ticket purchasing for the same hours as today. This would be subject to DfT support for the additional funding.
- In response to passenger concerns that the proposal would make it hard to know where to find help and support the proposal now includes the creation of designated Welcome Points. This would be an initial focal point that provides any customer who needs support and/or advice a place to start their journey. The intention is that Welcome Points will be clearly accessibly and visible from the station entrance and close to TVMs where possible. Each station will be individually assessed, and an appropriate location agreed, forming part of updated equality impact assessments for each station.
- These Welcome Points would have a *Help at Hand* facility. This would be similar to a 'call button' which connects passengers to retail trained staff should there be no one in the vicinity of the welcome desk. This will allow customers needing help with retailing to speak directly to the person waiting, so that staff can give reassurance and advice even while returning to help.
- In response to concern about the loss of access to some core products at the station and retail capacity, staff will now initially retain access to ticket office equipment until the introduction of handheld tablets with a ticket retailing function. These will be used for retailing tickets not available digitally/on TVMs and for queue busting.
- As a result of these changes you state that, "...we can now provide the same level of retail service to customers who will not/cannot move to digital. We are maintaining the current level of retail staffing capability and products will continue to be available for purchase at the station."
- TVMs will be upgraded to enable them to retail a wider range of tickets. Some
  will have cash facilities enabled and some will be able to sell car parking
  tickets where the ticket office currently does this.
- The process towards the closure of all ticket windows will be phased. The
  proposal is that ticket office transactions are reviewed on a quarterly basis
  through the period from the start of the programme, which is expected to be
  March 2024, following discussion with the Department for Transport and trade
  union negotiations, through to the expected end state in March 2025
  - Stations with one ticket window will remain open until phase two (potentially June 2024) when Welcome Points and Help at Hand facilities, along with handheld retail devices are in place.
  - For stations with more than ticket window, retail capacity reports will be reviewed every three months to identify where further phased reductions maybe possible.

We acknowledge that you have made significant changes to your original proposal in response to passenger feedback from the consultation, especially in reverting to current staffing hours in most cases. We know from our research that passengers value staff at stations highly for safety and security, information, and advice and help purchasing tickets.

Comments received during the consultation overwhelmingly reinforced this point with concern about availability of staff at the station the most important theme in the responses:

"I won't be able to get help when needed. Staff can provide Guidance on routes, advice and support. This will all stop if the are no staff". Oxford passenger

"I and many other people I know rely on the friendly face and knowledgeable advice given out by the people at the ticket office. Please don't put profit above people's well-being - a human face when navigating rail journeys and finding the best route is really important". Stroud passenger

We will now address each of our criteria points in detail against your revised proposal.

# 6a) Passengers can easily buy the right ticket for the journey they want to make

In our letter of 6 September we set out a number of issues arising from passenger submissions to the consultation and our own analysis. It was clear from the consultation that this was a key area of concern for passengers.

## Complexity of fares and ticketing

We acknowledge that there is a clear trend towards digital sales and away from sales at the station, and that this is likely to continue. However, a substantial number of people either cannot or have chosen not to move to digital to date.

Some, such as those who are unbanked and/or have no access to digital channels, have little choice but to buy from the station. Others are reluctant to move online — our research shows that this resistance often comes from uncertainty and a lack of confidence, exacerbated by the complexity and variety of ticket options available. This is not only a matter of personal preference, it is often for hard, practical reasons about routing or time restrictions and concern about the consequences of buying the wrong ticket, including potentially paying more than they needed to. Staff support often offers confidence that the most appropriate ticket for the journey has been purchased.

Comments received during the consultation illustrate this point:

"Please don't close offices. Here in St Austell trying to buy a sleeper ticket on line or from a booth turned me in to a gibbering wreck. The person on the counter did it with ease. I am older now and need a little help from time to time". St Austell passenger.

"The current ticketing system is complex and confusing. Many people either can't or don't want to navigate their way round it, eg deciding whether to split their tickets (eg at times, it's cheaper to buy one ticket to Oxford, another from Oxford to London), or which type of ticket would be cheapest for them". Charlbury passenger.

"My main problem with the proposals concerns reform of the ticketing system. We have long been promised a simplification and rationalisation of the ticketing system. If that had taken place then I think the use of online booking or a ticket machine would be okay. However, with our current complex system, the expertise of staff at ticket offices can be indispensable". Exeter passenger.

"This will make it particularly difficult for me to renew my season ticket, and almost certainly end up costing more for journeys that I don't regularly take, as it is almost impossible for an amateur to find the best tickets without the aid of trained staff". Twyford passenger

"As a computer literate, savvy person, my experiences with online ticketing and using the machine are beyond frustrating...Using the GWR site to find the optimal ticket for journeys from either Theale, Pangbourne or Cholsey is a nightmare. I'm literally trying to look online for a ticket for tomorrow and have given up. I'm scared to book a ticket online as it will most likely not be right." Cholsey passenger.

Useability of Ticket Vending Machines GWR's proposals place a much greater reliance on sales from Ticket Vending Machines (TVMs) than at present.

TVMs clearly have an important role to play in retailing tickets, and we know from our research that many regular users find them quick and easy to use once you know how. However, it is equally clear from our research and the comments received that some passengers still have concerns about using them. TVMs are not physically accessible to all passengers and some people with cognitive disabilities can have difficulties in using them. Others do not find them user-friendly, requiring a degree of prior knowledge of the fares structure which some passengers do not possess. In addition, not all TVMs can offer the same range of products and services as ticket offices.

Even where staff will still be present at the station it will be important that they have sufficient expertise to help passengers navigate the complex fares system. In contrast to many other self-service retail situations, for example a self-checkout at a supermarket, many passengers will need support not just to use the ticket vending machine, but also to understand what they should purchase and provide confidence they are getting the best deal.

An increased reliance on TVMs makes it even more important that they are monitored and maintained. This applies to operational resilience and to customer service quality. There are standards for queuing times at ticket offices (three minutes in the off-peak and five minutes in the peak). It is a requirement that these are monitored and reported on. There are no such targets for TVMs.

The useability of TVMs came through strongly in the consultation responses as did frustration at the frequency with which they are found to be out of order and their poor location. GWR may believe that its service level agreement for fault repair is among the best, if not the best in the industry, however, it was striking how many respondees referenced machines being repeatedly out of order for whatever reason.

"The ticket machine does not always work, particularly in hot or cold weather & frequently we cannot locate the guard on the train so have to queue at Reading to buy a ticket for onward travel." Mortimer passenger

"The station does have a single self-service ticket machine, but that is frequently out of action, is badly sited - the morning sun makes it challenging to read, and it is very wet when it rains, AND not all ticketing options are available, e.g. "PlusBus" or booking a bike on a train." Charlbury passenger

"I recently wanted to travel from Bodmin Parkway to Plymouth, then to Penzance & back to Bodmin. Knowing that a normal return ticket probably wouldn't be valid I visited the ticket office and was recommended a Cornwall Ranger ticket. I have since discovered that these are not available from ticket machines, so without the ticket office staff I would have either bought an invalid ticket for my journey or spent a lot more than was necessary". Bodmin Parkway passenger

## Retail capacity

Closing ticket windows also raises questions of retail capacity at the station – can TVMs cope with an increased level of sales? If not, then there is a risk of passengers being faced with unacceptable queues to purchase tickets, of missing trains, or in boarding without a valid ticket.

Comments received during the consultation included:

"Although I book via app. I do often use the ticket office at Swindon. I've never been there when it hasn't been busy and I've had to queue". Swindon Passenger

"We all had experiences before when on Sundays when office is closed and the machine queue is more than 10mins worth of wait, we had to make a choice of missing trains or board in the hopes that there is staff member on board for us to purchase tickets." Dawlish passenger

### Cash

Not everyone has a bank account or access to debit/credit cards – some people are reliant on cash to buy tickets. The guidance issued by the Secretary of State specifically mentions the need to take into account accessibility for customers who need to use cash or do not have a smartphone or access to the internet.

Under the existing National Rail Conditions of Travel if you bought your ticket using cash (for example, from a TVM) you are entitled to a refund in cash if your train is cancelled or delayed and you decide not to travel. It is important that this could still be provided in future. Passengers without a bank account also need to be able to receive compensation if their train is delayed. Currently ticket offices offer both these services.

Comments received during the consultation included:

"I use it [ticket office] regularly and don't like using machines - I only use cash". Plymouth passenger

"There are many many people in Teignmouth who don't/can't use a smartphone and who prefer to buy with cash after consulting a person about best/cheapest tickets". Teignmouth passenger

### Product range

Currently ticket offices provide access to a full list of products and services. TVMs do not sell/serve all of these. For example, GWR's TVMs do not sell products such as Railcards, Advance Purchase fares, Ranger/Rovers and National concessions for disabled people (for wheelchair and visually impaired passengers plus a companion). Nor do they provide seat reservations, allow you to change tickets/bookings or provide a means of obtaining a cash refund. At present these are available at the ticket window.

This came through in the public consultation:

"I will be impacted, I won't be able to buy the ticket I require as its only available from a booking office". Newton Abbott passenger.

"My elderly mother uses Teignmouth station ticket office regularly. She has to use the ticket office as she is a Priv ticket holder and this option is unavailable on the ticket machines. I am concerned she will now be unable to travel by train as there is no other way for her to buy her ticket and her seat reservations". Teignmouth passenger.

## Major stations

Responses from passengers on the proposals for major stations have highlighted a particular concern about how passengers will still get expert support and advice at particularly busy stations and where passengers perceive that ticket offices are still very well used.

"I'm shocked and disappointed you could consider closing ticket counters at large stations on your network. The explanation "some manned ticket offices only sell one ticket a day" gives legitimacy to their closure but is nonsense to use that as an argument for larger stations". Bristol Temple Meads passenger "There are 15 platforms at Reading Station as well as very large sprawling concourses which could result in station staff being a long way away and hidden from passengers." Reading stakeholder

### GWR's proposals (as revised) stated:

- In your response dated 27 September you state "Following the consultation and having listened to feedback from our customers and communities, we have reviewed this element of our original proposal and our updated proposal will now see all stations retain retail trained staff for the full period of current ticket retailing operating hours". As such staff will be available to assist customers with ticket purchasing for the same hours as today.
- The primary focus of multi skilled retail trained staff will be supporting passengers with their ticket purchases.
- Furthermore, retail experts will have same level of training as they do today. Existing trained retail staff will be redeployed from ticket offices into the multi-skilled role. When training new staff for the multi-skilled role, the competence level for ticket retailing will be at the same level and require the same training as it does today. Staff will also be trained to undertake active queue management at TVMs when queues are longer than a few minutes.
- Retail trained staff will initially retain access to the original ticket office sales equipment. Following training and procurement, access to ticket office equipment will be replaced with hand held tablets with a ticket retailing

- function, which can be used to retail tickets not available digitally/on the TVM and for queue busting.
- There will be a phased approach to the closure of ticket windows at larger stations and stations with higher levels of ticket office sales, to ensure the combination of TVMs and queue busting hand held devices will work. This will be based on a quarterly review of 'retail capacity reports'.
- Passengers will be able to buy all products at the station using cash or card.
- TVMs:
  - It is your intention to conduct a review of your TVM fleet to make best use of the machines in GWR's possession. You are also committed to increasing the number of TVMs overall (including the addition of a TVM at Yeovil Pen Mill) and will also move machines around the network
  - You are planning improvements to TVM functionality (covering Advance Purchase fares, season tickets and seat reservations) – but this is not planned to be completed until mid-late 2024 with completion expected by March 2025. It will require engagement with suppliers, RDG and industry partners and is dependent on funding.
- There are also industry wide proposals to:
  - Remove the requirement for a Photocard when purchasing a Season Ticket. Operators will accept any reasonable alternative form of ID, such as a driving licence, passport, railcard, student ID, alternative entitlement card (senior citizens pass) or national ID card. For customers who do not have access to a suitable alternative form of ID, a Photocard will still be available from remaining Ticket Offices and via post from a contact centre or third party retailer.
  - Offer people eligible for the national concessions for disabled people a Disabled Persons Railcard instead.

We acknowledge the reinstatement of staff hours back to the original ticket office hours and that this will ensure that there is a member of staff present for the same times as now at all stations. We also acknowledge that they will be trained to the same level as now and will be able to help passengers buy tickets from TVMs and via hand held retail devices.

We also acknowledge that GWR's proposals will still allow passengers at the station to buy/access all tickets and services currently available at ticket offices. This includes people who need to pay by cash. This will initially be delivered by retaining the existing ticket office sales equipment. Following training and procurement you will replace access to the ticket office equipment with hand held tablets with a ticket retailing function, which trained retail staff will again use for retailing tickets not available digitally/on the TVM and for queue busting when necessary.

However, we still have issues with the following:

## Retail capacity

We have assessed the ticket office sales data you provided (on a confidential basis) and it is clear that some ticket offices are still recording high levels of sales. You have provided assurances that the combination of TVM capacity and the retained ticket office equipment will be sufficient to cope with demand. It can be easy to use TVMs for a simple purchase but not for a more complicated journey, especially where there are restrictions on which operator or route you can take. We believe that those transactions could easily take much longer, especially when the people 'displaced' from ticket windows will also potentially be those less familiar with TVMs and how to use them.

We acknowledge that at stations with one operational ticket window the overall capacity will be largely the same, as the original ticket office equipment will be retained initially and later replaced by a handheld device. However, at stations that currently have two or more ticket windows some will see a reduction in overall retail capacity.

Having looked at the sales figures provided, and future retail provision, we have doubts over the ability of the following stations to cope with demand at high-peak periods: Barnstaple, Bridgewater (where one operational window and a TVM is not currently enough to cover current demand in the peak), Bristol Parkway, Didcot Parkway, Maidenhead, Reading, Swindon and Twyford.

We acknowledge your acceptance that the phased closure of windows at stations with multiple ticket windows should be based on evidence. However, we do not agree that the suggested 'retail capacity reports' are a suitable basis for such decisions.

We believe that there is a need for a nationally agreed, and enforceable, queuing time metric for TVMs. This could be based the existing standards at ticket office windows (three minutes in the off-peak and five minutes in the peak). This would create a formal review mechanism – if queues exceed the targets then action would need to be taken (such as issuing staff with hand-held ticket devices so that they can 'queue bust' and/or installing extra TVMs). There is also a strong argument for putting these results into the public domain, for example in Customer Reports.

There are a number of assumptions when it comes to future retailing – for example, how many people will migrate to digital channels, how many will move to TVMs, can TVMs absorb future demand? A robust queuing time regime (with

enforcement) will help provide reassurance and safeguards should industry forecasts not be correct.

A commitment to such a queuing time metric would also give assurance at those stations above where there are larger volumes of sales to absorb onto TVMs. It would ensure there is a formal mechanism to review sales volumes and, if projections were wrong, to increase retail capacity.

We also note that full and equivalent sales data has not been provided for Kemble. We recognise the difficulty of providing accurate sales data however, without sufficient data we are not able to properly carry out our duty and are obliged to object. Retail data provided for Charlbury, Henley and Stonehouse stations covered different time periods for different retail channels, however, we are satisfied that this provides an indicative picture.

#### Conclusion

**Objection 1:** Queuing time targets, monitoring and reporting for TVMs (based on that currently in use at ticket windows) must be implemented at all stations before any changes could take place.

**Objection 2:** We have specific concerns over the retail capacity at the following stations: Barnstaple, Bridgewater, Bristol Parkway, Didcot parkway, Maidenhead, Reading, Swindon and Twyford.

**Objection 3:** We object to the proposal for Kemble. Without full and equivalent sales data we are not able to conduct a proper assessment.

#### Major stations

We remain concerned at the proposals at major stations where sales volumes and footfall is still high, especially at peak times. We think there is a greater likelihood that the system of roving staff will break down as people crowd around staff at the TVMs or as they are walking somewhere to help another passenger. The potential lack of any obvious queuing system to get help could easily confuse and frustrate in equal measure – especially for someone new to the railway or a tourist. At major stations there are already staff available on the concourse and elsewhere at the station to provide passengers with information, accessibility assistance and other support. We also note that many other train operators have proposed to retain ticket offices at major stations. Therefore, we believe there is still a need for a staffed retail point at Bristol Temple Meads, Bath Spa, Reading, and Oxford.

### Conclusion

**Objection 4:** We believe there is still a need for a staffed retail point at the following stations: Bristol Temple Meads, Bath Spa, Reading, and Oxford.

## 6b) Passengers requiring assistance to travel receive that assistance in a timely and reliable manner

In our letter of 6 September we set out a number of issues arising from passenger submissions to the consultation and our own analysis. This was one of passengers' main concerns during the consultation.

We know through our research that passengers value staff at stations highly. This is not just related to selling tickets but also in providing assistance and support. A reduction in staff presence would have an impact on disabled passengers' ability to 'turn up and go'. While in many cases staff on the train would have been able to assist passengers on and off the train, they were unlikely to be able to fully assist with journey planning, ticket purchase or getting to and from the platform.

Comments received during the consultation included:

"At a month from my 88th birthday, I am still travelling regularly by rail but this requires managing...If you remove the ticket office staff from Bath Station, I will no longer have the confidence to travel on my own by rail. This will have a direct impact on my independence and ultimately on my mental health." Bath passenger.

"Please, please don't close any ticket offices. I am deaf and have a form of Parkinson's, travel is difficult and confusing enough as it is." Bodmin Parkway passenger

In addition to widespread concern in the consultation about a reduction in staffing at stations, passengers were also worried that when stations were staffed they may find it more difficult to find staff. Currently passengers know to approach the ticket office – it is the focal point. We understand that guide dogs are trained to go to the ticket window, and it is also the case that ticket windows have induction loops to help people hear.

"How will visually impaired or blind people find staff to help at ticket machines as quickly as a ticket office?" Barnstable passenger

"I am totally blind ...To be able to travel safely and independently, I rely on human interactions from staff members and being able to find them reliably in a fixed location near the entrance to the station". GWR passenger

"I am a blind person. I am unable to use self-service machines. Even if I don't buy my ticket at the station, I need a place to alert staff to my accessibility/assistance needs. If you abolish the ticket office, how am I to know who is train station staff? Are you expecting me to approach random strangers in the hope they can be trusted to help me with my credit card and the ticket machines?" Bath passenger

GWR's proposals (as revised) stated:

- All stations would now see no change in the staffing hours with retail staffing hours reverting to current times. Therefore, retail-trained staff would be available to assist customers with ticket purchasing for the same hours as today. This would be subject to DfT support for the additional funding.
- In response to passenger concerns that the proposal would make it hard to know where to find help and support the proposal now includes the creation of designated Welcome Points. This would be an initial focal point that provides any customer who needs support and/or advice a place to start their journey. The intention is that Welcome Points will be clearly accessibly and visible from the station entrance and close to TVMs where possible. Each station will be individually assessed, and an appropriate location agreed, forming part of updated equality impact assessments for each station.
- These Welcome Points would have a Help at Hand facility. This would be similar to a 'call button' which connects passengers to retail trained staff should there be no one in the vicinity of the welcome desk. This will allow customers needing help with retailing to speak directly to the person waiting, so that staff can give reassurance and advice even while returning to help.

We acknowledge the reinstatement of staff hours back to the original ticket office hours and that this should ensure that there is retail-trained member staff present at the same times as now.

At some of the smaller stations – where ticket office staff are the only members of staff present - we also acknowledge that this could result in more physical assistance actually being available – such as in helping with bags or showing people to the platform - in a way that is not always possible while staff are in a ticket office.

We note the concept of the Welcome Point as a means of creating an alternative focal point at the station. We think there is merit in this idea but that there is much that still needs to be developed in terms of how the new Welcome point arrangements would work in practice. For example, in how people will find a staff member if they are not at the Welcome Point or alert staff they need help, whether an induction loop will be provided, what queuing arrangements will apply if several people want help at the same time, and how visually impaired passengers would know that someone offering to help was a genuine member of staff. It is clear from the consultation that passengers value staff and want clarity and certainty on how they can find them at the station.

We are aware that industry-wide proposals on this are being discussed. However, as it stands there is lack of clarity and detail on this proposal. We sought industry-wide assurances on the following:

- A mechanism for alerting staff that you are at the Welcome Point and need assistance, at each station. It should be clear that this is for all passengers and not just those with a disability.
- A mechanism of informing people that the Welcome Point has shut (to avoid people waiting there after staff have gone home or where the staff member is ill/off work. This happens at a ticket office by virtue of the blind being closed).
- Clarity over what services/support will be provided to passengers (for example, would this also function as the meeting point for passengers who have booked Passenger Assistance).
- Whether induction loops would be fitted.

We acknowledge that your proposal addressed some of these, in particular the 'Help at Hand' facility.

However, it is an important principle that people affected by a proposal should have a say on that proposal: "nothing about us without us". While we acknowledge that your proposal points to engagement with the GWR accessibility panel and familiarisation sessions with relevant groups Welcome Points were not explained as part of the consultation so passengers have not had the opportunity to comment on these plans or to highlight potential concerns. To that end we believe it is important that there is further engagement with the Disabled Persons Transport Advisory Committee (DPTAC) and with disabled people and representative groups on the concept, design and implementation of these welcome points.

The Welcome Point concept is a fundamental change for passengers, especially disabled passengers, so it is important that they work in practice and that passengers have confidence in them. It was clear from the consultation that accessibility, particularly the availability of staff to provide assistance, was a key area of concern. Therefore we believe they must be piloted/trialled to establish what works best at different types of stations and how passengers react to them. Proposals on ticket offices would need to await the outcome of these pilots.

In addition, we note the fact that documentation provided by GWR suggests that not all stations have Help Points. In places this contradicts in formation in the public domain. These stations include Bath Spa, Bristol Temple Meads, Kemble, Reading and Worle. We would urge you to address this as a matter of urgency.

### Conclusion

**Objection 5:** We believe that there must be further engagement (as above) on the design, location and implementation of Welcome Points.

**Objection 6:** We believe that the Welcome Point concept must be piloted and reviewed before any changes to ticket offices take place.

## 6c) Passengers can get the information they require to plan and make a journey, including during periods of disruption

It is clear from the public consultation that passengers particularly value the information provided by staff at a station. Reducing the hours staff are available or making it harder to find them, would make it harder for passengers to access advice and information from staff.

"This is where I receive travel information when travelling cross country by train" Oxford passenger

"Whilst I am generally able to book tickets online prior to travel and collect at the station, I do often have the need to get help from the ticket office. This is not just when the ticket machines are faulty (which they often are!) but also the staff are very helpful when planning routes when services are late or disrupted and in finding the cheapest fares suitable." Chippenham passenger

"It is a vital part of our community, and Jill in the office offers valuable help and guidance to citizens for journeys. Especially those who are less able-bodied and for who rail journeys can be stressful and require extra planning considerations". Yatton passenger

## GWR's proposals (as revised) stated:

- All stations would now see no change in the staffing hours with retail staffing hours reverting to current times. Therefore, retail-trained staff would be available to assist customers for at least the same hours as today. This would be subject to DfT support for the additional funding.
- Ancillary information will continue to be available in a variety of places including waiting rooms and concourses. You will also have staff at the station who will be able to provide advice including providing printed journey information.
- The handheld devices that we are proposing to introduce will be able to retail tickets and also print journey itineraries.

We acknowledge the commitment to maintain the staffing times as they are now. Staff in the new customer help roles will be present for the same times/hours as existing ticket office staff. We believe that this should ensure that passengers have the same access to journey planning and disruption information as now.

#### Conclusion

We are satisfied that staff will be able to provide the same level of journey planning information as now, including during periods of disruption. **No Objection**.

## 6d) Passengers feel safe at a station

Proposals to reduce or remove staff presence at stations risked making passengers feel less safe at stations than now.

We received a number of comments about this in the consultation:

"As a woman I am glad I usually travel from a large station which has staff. However when visiting friends e.g. West Ealing station I am genuinely frightened when alone at smaller stations, especially after dark". Swindon passenger

"I feel safer when someone is there at the station as a lone female". Chippenham passenger

Our research into passenger priorities in 2022\* showed that personal security was the highest station-based priority for passengers. While most passengers tell us they are broadly satisfied with their personal security at the station – of those that weren't, the main cause was the antisocial behaviour of other passengers\*\*. This ranged from people putting feet on seats or playing music loudly to drunken/rowdy behaviour \*Britain's railway: what matters to passengers. Transport Focus, 2022.

\*\* Passenger perceptions of personal security on the railway. Transport Focus, 2016

Our research also shows that personal security is a higher priority among women and disabled passengers. In 2022 we worked with Transport for the West Midlands to better understand the experiences of women and girls when travelling on public transport\*\*\*. Our colleagues at London TravelWatch also looked at personal security on London's transport network\*\*\*\*. It also found that women and disabled users were more likely to feel unsafe.

\*\*\*Experiences of women and girls on transport. Transport Focus, 2022

\*\*\*\*Personal Security on London's Transport Network Recommendations for safer travel. London TravelWatch, 2022

Good lighting, CCTV, clear sightlines, the availability of help points, and a well-maintained environment can all help people feel safer. But it is also clear that passengers still value a visible staff presence across the network. The latter provides reassurance, helping enhance passenger perceptions of personal security and acting as a deterrent to crime and disorder.

GWR's proposals (as revised) stated:

- All stations would now see no change in the staffing hours with retail staffing hours reverting to current times. Therefore, retail-trained staff would be available to assist customers for at least the same hours as today. This would be subject to DfT support for the additional funding.
- The Department for Transport and British Transport Police have agreed that you should complete a Crime and Vulnerability Risk Assessment reflecting the

change proposals. This assessment will be completed for each station and will form part of the decision-making process before any ticket office is closed.

We acknowledge the commitment to maintain the staffing times as they are now. We believe that this should provide the same level of reassurance to passengers as now. Indeed, in some instances, having more a more visible staff presence could improve perceptions of safety. However, it will be important that the risk assessment mentioned above are completed and acted upon before any changes are made.

### Conclusion

We are satisfied that the proposal will not negatively affect passengers' personal security at the station. **No objection**.

**Recommendation 1:** There should be no implementation of proposals until the crime and vulnerability audits mentioned above have been completed and any necessary actions have been implemented.

# 6e) Passengers are not penalised if they cannot buy the ticket they require from the station

In our letter of 6 September we were concerned that relying on TVMs that are not fully accessible, or do not sell the full product range could mean more passengers are unable to buy the ticket they want before they board the train. This could result in people having to buy the 'wrong' ticket or risk being penalised for boarding without a valid ticket.

"If passenger assistance is not available in a timely manner, to purchase the correct ticket, the innocent passenger will be treated unfairly as a fare evader". Liskeard passenger.

"This summer in particular it has become more common for regular users of the train from Camborne arriving at the office to find it is closed when it should be open and then being treated like criminals by seasonal revenue protection agents on the train for boarding the train having not purchased a ticket, despite the office being closed and the one machine being unable to keep up with demand on its own and not providing the full range of options and advice that a human staff member can". Cambourne passenger.

## GWR's proposals (as revised) stated:

 All stations would now see no change in the staffing hours – with retail staffing hours reverting to current times. Therefore, retail-trained staff would be available to assist customers for at least the same hours as today. This would be subject to DfT support for the additional funding.

- All tickets/services would be available at the station as they are today, including for cash The existing station ticket office machine would be used to issue tickets not available from TVMs.
- As all tickets would be available from the station, current rules on ticketless travel would still apply. You will issue reminders to staff and customers about existing rules on ticketless travel (Section 6.1 of the National Rail Conditions of Travel), which refers to the conditions that allow current boarding without a ticket.

We acknowledge the commitment to maintain retail staffing times as they are now and to maintain the same range of tickets/services as now. We believe that this should ensure that passengers have the same opportunity to purchase before they board as they have now. However, it will be important to monitor queue lengths - as set out above.

## Conclusion

We are satisfied that the proposal should not create any additional risks for passengers (subject to queuing targets being implemented as above). **No objection.** 

## 6f) Passengers can continue to use facilities at a station.

In our letter of 6 September we expressed concern at instances where facilities such as waiting rooms, toilets (including accessible toilets), and lifts could/would be closed because there was no member of staff to open them. We were concerned that any changes to ticket retailing at stations should not result in a reduction in access to key passenger facilities. Station facilities such as waiting rooms, lifts and toilets are important to the customer experience for many passengers, while for some passengers they are an essential in enabling them to travel by train.

"Local train stations including Stroud/Kemble already have enough issues with access and then when de-manned (i.e. weekends/Sundays); the toilets are always locked and no one to unlock them - why is this? I can understand over night but in daytime hours? My daughter with a new baby was stuck without a toilet at both Stroud and Kemble..." Stroud passenger

Your proposals (as revised) stated:

- All stations would now see no change in the staffing hours with retail staffing hours reverting to current times. Therefore, staff would be available to assist customers for at least the same hours as today. This would be subject to DfT support for the additional funding.
- All station facilities that are currently provided during ticket office opening hours will remain open during those hours.

We acknowledge that facilities at stations will be open/available for the same times as now.

#### Conclusion

We are satisfied that the commitment to maintain original staffed times will mean passengers have the same level of access to station facilities as now. **No objection** 

## 6g) Other issues

Transport Focus's published <u>criteria</u> stated that we would also consider any other issues raised by members of the public during the consultation. Two key issues were:

## i) Future regulation

The public consultation feedback highlighted a widespread concern that if ticket offices are closed and 'schedule 17' regulation no longer applies, there will be no ongoing requirement to consult on any future changes.

Many passengers fear that train companies will make further cuts to staff if existing regulations are removed and even that any mitigations promised, or commitments made, as part of the current consultation could quickly be lost.

"It is also of significant concern that if ticket offices are closed, there would no longer be any statutory regulation of staffing provision at stations and the passenger watchdogs would have no formal role in monitoring this. Undoubtedly this will lead to reduced staffing provision at stations." Charlbury Stakeholder

Your letter of 27 September stated that this was being looked at by the wider rail industry and the Rail Delivery Group with a recommendation that commitments on staffing levels should be linked to train operators Assisted Travel Policy (ATP)

We think this could be an option but feel that it may require modifications to the ATP guidance. The key requirement for us is a commitment (and process) to consult on specific changes to staffing at a station, at both an individual station level and wider. We also think there is a need to maintain public engagement as well. The value of this can be seen in the current process whereby train companies have responded to passenger feedback – that improvement loop would be lost if there was no mechanism in future.

We believe that there needs to be a commitment/process in place before changes can go ahead.

#### Conclusion

**Objection 7:** An alternative engagement/consultation mechanism is required for any future material changes in staffing at a station.

## ii) Timing of mitigations

Transport Focus is on record as saying that mitigations need to be in place before the changes come in [<u>Evidence</u> to the House of Commons Transport Committee hearing – 13 September 2023].

GWR's letter of 27 September referred to a phased system of implementation. The main mitigation in your proposal is the decision to retain the existing station ticket machine and then replace these with handheld devices that can provide access to all products/services currently available. We believe that this safety net must be retained, especially for those who are non-digital and/or cash based. Any future change to retailing should be conditional on such services being maintained, and on consultation.

Other mitigations have also been proposed around Welcome Points and Crime and Vulnerability surveys. We have already set out in the sections above the importance of these being addressed prior to any changes at ticket offices.

There would also be a need for a clear, co-ordinated communication plan surrounding any changes (should they go ahead). This would need to set out what was being done and by when. It is clear from the consultation that passengers feel very strongly about this issue and have a number of concerns that have yet to be publicly addressed. This will be especially important given that proposals have changed since the original consultation – passengers will need to be guided through the improvements and mitigations.

#### Conclusion

**Recommendation 2:** GWRs proposed retention of the ticket office sales equipment (and subsequent purchase of hand held retail devices) provides a safety net for those passengers unable to purchase the ticket they need on a TVM or online. We believe that this safety net must be retained, especially for those who are non-digital and/or cash based. Any future change in retailing should be conditional on this, and on consultation.

**Recommendation 3:** It will be essential that there is a clear, co-ordinated communication plan to inform passengers should any changes go ahead.

## iii) Monitoring and review

We do not think there has been enough focus in plans on reviewing and monitoring changes should they go ahead. There is a need to assess whether mitigations have been delivered and, crucially, whether passengers feel the new arrangements are working. This would require research with passengers and a series of metrics designed to monitor the impact.

As stated earlier, we think this must include queuing time metrics at Ticket Vending Machines. A robust queuing time regime (with enforcement) will help provide reassurance and safeguards should industry forecasts not be correct. This regime must be in place before any changes took place.

## Conclusion

**Objection 8:** There must be a robust monitoring and review mechanism in place to review any changes. This must include queueing time metrics.

## 7. Assessment for each station

**Objection 1:** Queuing time targets, monitoring and reporting for TVMs (based on that currently in use at ticket windows) must be implemented at all stations before any changes could take place.

**Objection 2:** We have specific concerns over the retail capacity at the following stations: Barnstaple, Bridgewater, Bristol Parkway, Didcot parkway, Maidenhead, Reading, Swindon and Twyford.

**Objection 3:** We object to the proposal for Kemble. Without full and equivalent sales data we are not able to conduct a proper assessment.

**Objection 4:** We believe there is still a need for a staffed retail point at the following stations: Bristol Temple Meads, Bath Spa, Reading, and Oxford.

**Objection 5:** We believe that there must be further engagement (as above) on the design, location and implementation of Welcome Points.

**Objection 6:** We believe that the Welcome Point concept must be piloted and reviewed before any changes to ticket offices take place

**Objection 7:** An alternative engagement/consultation mechanism is required for any future material changes in staffing at a station.

**Objection 8:** There must be a robust monitoring and review mechanism in place to review any changes. This must include queueing time metrics.

Decision	Grounds for objection (see text above)
Objection	1, 2, 5, 6, 7, 8
Objection	1, 4, 5, 6, 7, 8
Objection	1, 5, 6, 7, 8
Objection	1, 5, 6, 7, 8
Objection	1, 5, 6, 7, 8
Objection	1, 5, 6, 7, 8
Objection	1, 2, 5, 6, 7, 8
Objection	1, 2, 5, 6, 7, 8
Objection	1, 4, 5, 6, 7, 8
Objection	1, 5, 6, 7, 8
Objection	1, 5, 6, 7,8
Objection	1, 5, 6, 7, 8
Objection	1, 5, 6, 7, 8
	Objection

Chippenham	Objection	1, 5, 6, 7, 8
Cholsey	Objection	1, 5, 6, 7, 8
Cookham	Objection	1, 5, 6, 7, 8
Crowthorne	Objection	1, 5, 6, 7, 8
Dawlish	Objection	1, 5, 6, 7, 8
Didcot Parkway	Objection	1, 2, 5, 6, 7, 8
Evesham	Objection	1, 5, 6, 7, 8
Exeter Central	Objection	1, 5, 6, 7, 8
Exeter St Davids	Objection	1, 5, 6, 7, 8
Exmouth	Objection	1, 5, 6, 7, 8
Filton Abbey Wood*	Objection	1, 5, 6*, 7*, 8
Frome	Objection	1, 5, 6, 7, 8
Furze Platt	Objection	1, 5, 6, 7, 8
Gloucester	Objection	1, 5, 6, 7, 8
Goring & Streatley	Objection	1, 5, 6, 7, 8
Henley-On-Thames	Objection	
Kemble	Objection	
Keynsham*	Objection	
Kingham	Objection	1, 5, 6, 7, 8
Liskeard	Objection	1, 5, 6, 7, 8
Maidenhead	Objection	
Moreton in Marsh	Objection	1, 5, 6, 7, 8
Mortimer	Objection	
Nailsea & Backwell*	Objection	
Newbury	Objection	1, 5, 6, 7, 8
Newton Abbot	Objection	
North Camp	Objection	
Oldfield Park*	Objection	1, 5, 6*, 7*, 8
Oxford	Objection	1, 4, 5, 6, 7, 8
Paignton	Objection	1, 5, 6, 7, 8
Pangbourne	Objection	1, 5, 6, 7, 8
Par	Objection	1, 5, 6, 7, 8
Penzance	Objection	1, 5, 6, 7, 8
Pewsey	Objection	1, 5, 6, 7, 8
Plymouth	Objection	1, 5, 6, 7, 8
Reading	Objection	1, 2, 4, 5, 6, 7, 8
Reading West	Objection	1, 5, 6, 7, 8
Redruth	Objection	1, 5, 6, 7, 8
St Austell	Objection	1, 5, 6, 7, 8
St Erth	Objection	1, 5, 6, 7, 8
Stonehouse (Glos)	Objection	1, 5, 6, 7, 8
Stroud	Objection	1, 5, 6, 7, 8
Swindon	Objection	1, 2, 5, 6, 7, 8
CHINGON		., _, 0, 0, 1, 0

Taunton	Objection	1, 5, 6, 7, 8
Teignmouth	Objection	1, 5, 6, 7, 8
Thatcham	Objection	1, 5, 6, 7, 8
Theale	Objection	1, 5, 6, 7, 8
Tilehurst	Objection	1, 5, 6, 7, 8
Tiverton Parkway	Objection	1, 5, 6, 7, 8
Torquay	Objection	1, 5, 6, 7, 8
Totnes	Objection	1, 5, 6, 7, 8
Trowbridge	Objection	1, 5, 6, 7, 8
Truro	Objection	1, 5, 6, 7, 8
Twyford	Objection	1, 2, 5, 6, 7, 8
Warminster	Objection	1, 5, 6, 7, 8
Westbury Wilts	Objection	1, 5, 6, 7, 8
Weston-Super-Mare	Objection	1, 5, 6, 7, 8
Worcestershire Parkway	Objection	1, 5, 6, 7, 8
Worle*	Objection	1, 5, 6*, 7*, 8
Yate*	Objection	1, 5, 6*, 7*, 8
Yatton	Objection	1, 5, 6, 7, 8
Yeovil Pen Mill	Objection	1, 5, 6, 7, 8.

<sup>\*</sup>It is unclear whether Welcome Points will be introduced at these stations. Should this be then these objections will apply.

## **Transport Focus 31 October 2023**

## Annex

- 1 Total objections received for Great Western Railway
- 2 Transport Focus's letter of 6 September
- 3 GWR response to that letter.

## Annex 1: Total objections received for Great Western Railway

## Station specific objections:

Barnstaple	1098
Bath Spa	949
Bodmin Parkway	164
Bourne End	42
Bradford On Avon	154
Bramley Hants	10
Bridgwater	131
Bristol Parkway	332
Bristol Temple Mea	ds 717
Camborne	148
Castle Cary	131
Charlbury	77
Cheltenham Spa	192
Chippenham	514
Cholsey	42
Cookham	22
Crowthorne	26
Dawlish	266
Didcot Parkway	517
Evesham	101
Exeter Central	285
Exeter St Davids	571
Exmouth	728
Filton Abbey Wood	18
Frome	182
Furze Platt	22
Gloucester	412
Goring & Streatley	74
Henley On Thames	38
Kemble	51
Keynsham	149
Kingham	37
Liskeard	278
Maidenhead	221
Moreton In Marsh	69
Mortimer	43
Nailsea & Backwell	24
Newbury	134
Newton Abbot	417

North Camp Oldfield Park Oxford Paignton Pangbourne Par Penzance Pewsey Plymouth Reading Reading West Redruth St Austell St Erth Stonehouse Stroud Swindon Taunton Teignmouth Thatcham Theale Tilehurst	10 67 922 311 53 18 2075 69 728 894 42 253 571 80 33 1189 457 582 264 57 29 44	
Tilehurst	44	
Tiverton Parkway	195	
Torquay	212	
Totnes	508	
Trowbridge	114	
Truro	522	
Twyford	273	
Warminster	92	
Westbury	120	
Weston-Super-Mare		
Worcestershire Park	•	46
Worle	9	
Yate	13	
Yatton	207	
Yeovil Pen Mill	39.	

## Total 20,916

In addition to the 20,916 station specific objections listed above Transport Focus also received 36,906 responses objecting to GWR's proposals in general.

Total Great Western Railway objections: 57,825

Transport Focus also received a further 93,185 responses objecting to the proposals nationally which were not attributable to a specific station or train company.

Some responses received by our shared Freepost address and addressed jointly to Transport Focus and London TravelWatch have been counted by both organisations as the objection could apply to stations in both organisations' areas.

The following station specific petitions (with the number of signatures) were also received by Transport Focus in response to Great Western Railway's proposals:

Barnstaple 575 Bradford on Avon 3365 Cookham 271 Frome 114 Maidenhead 2350 Moreton In Marsh 50 Paignton 456 Penzance 1245 Tiverton Parkway 10.

We received copies of the following online petitions:

 ${\bf Change.org - \underline{https://www.change.org/p/save-our-railway-ticket-offices}}$ 

Megaphone - <a href="https://www.megaphone.org.uk/petitions/cut-their-profits-not-our-ticket-offices">https://www.megaphone.org.uk/petitions/cut-their-profits-not-our-ticket-offices</a>

We are also aware of the following online petitions:

Parliament - <a href="https://petition.parliament.uk/petitions/636542">https://petition.parliament.uk/petitions/636542</a>

38degrees - https://act.38degrees.org.uk/act/keep-ticket-offices-open-petition

We also received a report on a survey from 38 Degrees with 26,194 responses objecting to the changes nationally.