

Northern'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 Northern's 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

Northern published details of its original proposal on 5 July. The public consultation on this ran until 1 September. Transport Focus received 60,339 representations objecting to Northern's proposal and 90 representations supporting Northern's proposal.

Transport Focus used information provided by Northern 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. The response proposed significant amendments to the original proposal.

There are two aspects to Northern's revised proposals:

- those relating to proposals to close ticket offices completely.
- those where a ticket office will be retained but the hours changed.

Proposals to close ticket offices

Transport Focus acknowledges that Northern has made some improvements to its original proposal. However, having analysed these revised proposals we have concerns at the proposal to close ticket offices at 131 stations. Some of these are specific to Northern and some are generic issues at an industry-wide level. However, as a result, we must object to **all** proposals to close ticket offices at Northern stations. A full list of the stations this applies to is provided at the end of this letter.

The main reasons for this are:

- Staff presence

We are concerned at the reduction in staff presence at stations:

- At 53 stations the ticket office will be closed and staff redeployed. There will be no fixed staff presence at these stations (see Annex 2, list A).
- At 72 stations ticket offices will be closed and staff redeployed 'out from behind the glass' for the same hours as now (see Annex 2 list B). Staffing on Sundays would no longer be on a fixed basis – it would now be, as Northern has phrased it, data- and resource-led. This would result in 35 stations no longer having a fixed staff presence on Sundays (see Annex 2, list C).
- The reduction in staffing will have an impact on the quality of service experienced by passengers at those stations.

- Access to rail products

We are not satisfied that passengers would continue to enjoy widespread and easy access to the purchase of rail products at most stations.

- 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 (such as issuing staff with hand-held ticket devices so that they can 'queue bust' and/or installing extra TVMs).

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.

Proposals to retain ticket offices but to change their opening hours

Northern propose retaining ticket offices at 18 stations but altering the staffing hours (see Annex 2, list F). Ticket office hours are extended at two stations, Blackburn and Hartlepool and reduced at 16.

Transport Focus has not objected to proposals for Blackburn, Hartlepool, Harrogate and Salford Crescent.

Transport Focus has objected to proposals for Barrow in Furness, Blackpool North, Bolton, Bradford Interchange, Glossop, Leeds, Liverpool Lime Street, Manchester Oxford Road, Manchester Victoria, Rochdale, Warrington Central, Wigan Westgate, St Helens Central and Skipton.

It is clear from the consultation response that members of the public and passengers had serious misgivings with the original proposal. Transport Focus has analysed the proposal and any mitigations designed to address passengers' concerns. The following detailed analysis identifies our remaining concerns and why we have objected to the proposal to close ticket offices.

3. The process

The procedure for making a major change to ticket office opening hours is set out in clause 6-18 of the [Ticketing and Settlement Agreement](#) (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 a total of 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 level, 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 60,339 objections to Northern'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 90 representations supporting Northern’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 rail products, 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 [guidance](#) setting out the approach the Secretary of State (SofS) would take in these circumstances. This guidance 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 [criteria](#) (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. Northern replied on 6 October. These letters are attached as Annex 3 and 4.

Northern's original proposal was to:

- Close ticket offices at 131 stations in phased stages over an 18-month period, and introduce the 'Journey Maker' role across the Northern network. The multi-skilled Journey Maker role aims to be more visible and support people who need extra help travelling through stations and onto trains.

- Reduce the number of hours staff are present at these 131 stations.
- At 53 stations, Journey Makers would be in a 'roving' capacity and scheduled for shifts of 2 hours per day at these stations.
- Retain ticket offices at the 18 stations listed below with amended ticket office opening hours.
 - Barrow-in-Furness
 - Blackburn
 - Blackpool North
 - Bolton
 - Bradford Interchange
 - Glossop
 - Harrogate
 - Hartlepool
 - Leeds
 - Liverpool Lime Street
 - Manchester Oxford Road
 - Manchester Victoria
 - Rochdale
 - Salford Crescent
 - Skipton
 - St Helens Central
 - Warrington Central
 - Wigan Wallgate.
- Journey Makers will not retail tickets (except at stations retaining a ticket office) but instead support customers to buy at ticket machines or through the customer's own mobile device.
- All 149 stations that have ticket offices currently will continue to have a staff presence with the number of hours staff are present to be reduced, some significantly.

Your letter of 6 October made significant changes to your proposals:

- Remove staff completely from 53 currently staffed stations based on the below criteria (see Annex 2 - list A for the stations involved):
 - low station ticket office sales (less than 12 ticket sales per hour)
 - low passenger assists (less than one per week) and;
 - low footfall data and station categorisation (Office of Rail and Road – ORR- Category E stations).
- Close the ticket office but redeploy staff as Journey Makers at 72 stations (see Annex 2 – list B for details of the stations). Staffing on Sundays will be led by data and customer needs rather than on a fixed basis.
- 35 out of these 72 stations are currently staffed on Sundays (see Annex 2 – list C).

- As in your original proposal, you will retain ticket offices at 18 locations but you will now extend ticket office hours at two of those, Blackburn and Hartlepool.
- Extend staff hours based on the accessibility requirements of active barrow crossings (staff will be present from first to last train) at the following stations:
 - Appleby
 - Bridlington
 - Hexham
 - Settle
 - Thorne North
 - Ulverston.
- Station facilities which are currently provided during ticket office opening hours will remain open for the same length of time as present and in some cases, will be available for longer. This is subject to funding approval and the implementation timeline will be aligned ahead of the phased closure of ticket offices.
- Northern's CCTV facilities are currently undergoing an overhaul in a phased approach based on footfall and risk parameters. This is to ensure these stations will have modern CCTV capability and the ability to be remotely accessed.
- Where improvements are needed for TVMs to fully support accessibility requirements, these will be implemented prior to the closure of the ticket offices. It should be noted that this is stated 'where possible' in the revised proposal.

We note the decision in the revised proposals to remove fixed staffing hours from 53 stations. In the public consultation these stations had a staff presence and passengers will have responded to the public consultation on this basis. One of the 'Gunning Principles' for consultations is that there is sufficient information on which to give 'intelligent consideration'. We believe that passengers at these 53 stations could reasonably claim that they have been denied this and that their response could/would have been different if they had been in possession of the new details. We believe this is something Northern will need to address.

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 am a 70 year old woman with reasonable technology skills i.e. On- line shopping etc. but there is absolutely no way I can navigate the complexity of planning a rail journey and booking tickets without the assistance of someone with expertise. Many of my friends actually do not own a smartphone or tablet so will effectively be unable to use trains. The ticket machines on the platforms

are complicated to operate especially if trying to use a pass etc. And as for long distance travel impossible to use. My local station, Bingley, in West Yorkshire has a busy ticket office and substantial queues on a weekend. Staff are brilliant and always ready to help. At the moment there is one machine available outside the office and I have been informed there are no plans to install more. The queues will be horrendous as people struggle to purchase tickets....”
Bingley passenger

“The way I use public transport (trains) is by going to the ticket office a few days before and personally asking for the timetables for the journey, the price and if there is a direct route or if I will have to change trains to reach my destination. I always buy train tickets at the ticket office since I feel more secure having the right and necessary information first hand and from a person.” Cheadle Hulme passenger

“I have used Blackpool North station for 50 years and have always found them helpful efficient and friendly. They have helped with complicated journeys, rail cards, and I value their support. I would find it difficult to manage without them, I prefer paper tickets and railcards, as do many people. It is a very busy station all year with locals and visitors so a properly functioning ticket office with enough staff is vital.” Blackpool North passenger

“I am dependent on station staff to issue correct tickets taking into account my senior railcard and GMT concessionary pass. The counter itself helps me lay out my purse, cards and passes during transactions. The thought of trying to purchase a ticket from one of your personnel located on the platform horrifies me.” Cheadle Hulme 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 responses from passengers, this was a key area of concern.

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:

“I am quite unable to navigate my way through online ticket purchase. It is complicated and never seems to give me the options for complicated journeys that I make with various changes. So, at present I need to go in person to Hexham (12 miles) or Carlisle (25 miles) for my needs. Please reconsider this idea, it will be especially hard for those of us like me who is over 75 and not good at the internet.” Hexham passenger

“Myself and my wife use the ticket office to make sure we have the right ticket. We used it today for a trip to Hebden Bridge as the information provided on line about tickets available from different rail companies was confusing and very unclear concerning restrictions. I simply do not believe that staff will still be available to help if the ticket office is closed...” Hebden Bridge passenger

“I have ADHD and often need help when booking tickets as I struggle to understand the restrictions on certain tickets. I have found the staff at the Lime Street ticket office to be invaluable and the thought of being left to navigate complex ticketing issues by myself makes me somewhat anxious and more likely to use my car for journeys I could make by train.” Liverpool Lime Street passenger

Useability of Ticket Vending Machines

Northern’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. We also noted many instances of passenger responses stating the TVM at their local station is often out of order.

“I often use the ticket office in Levenshulme station. The solitary ticket machine for the station is frequently out of order, or very slow to use because the screen is so unresponsive, so having a staffed office has been crucial to getting e.g. a day return ticket in time to catch a train.” Levenshulme passenger

“...Only yesterday there was a note on the ticket machine saying it was out of order and to use the ticket office instead.” Settle passenger

“...this is in sharp contrast to my experience when I have used the various stations that do not have ticket offices or have more restricted hours than the one in Keighley. I have found the ticket machines to be frequently out of order. When they are functioning there is often a long queue due to the difficulty of using them. This is especially the case, if one has a railcard and therefore has to negotiate a complex menu to find the correct type. It is common for a queue of impatient and frustrated passengers to form due to the delays and difficulties of using the technology.” Keighley passenger

“I'm concerned for my elderly parents, and others like them. They struggle with the ticket machines and buying tickets online, and that's despite being fairly tech-savvy compared with other people their age. Not having the option to buy a ticket from a person in the office may discourage them from using the train.” Widnes passenger

“I commute from New Mills Central station - there is one ticket machine there that is frequently out of order. If you're going to get rid of the ticket office altogether then you should first make sure the alternative is actually a robust solution!” New Mills 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.

“...I purchase tickets here often due to several reasons. 1, I can and prefer to use cash. 2, I get good travel information i.e. best ticket price, best travel times, interchange station information etc. Etc. 3, the ticket machine can be out of use or as lately suffered arson attack. 4, it is convenient as I never need to queue at a machine as others can't negotiate the instructions, whereby the ticket officer is straightforward, informative, polite, courteous and efficient.” Littleborough passenger

“There is often a long queue at the machine as each customer tries to grapple with it sometimes unsuccessfully and requiring the help of others in the queue. Sometimes it isn't working at all. It also doesn't offer you the best price and it's difficult to know whether you have the right ticket. I have witnessed older people in a panic because they cannot use the machine. It's not clear what you should do if unable to purchase a ticket.” Cross Gates 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.

“The closure of ticket offices is going to increase the digital divide for older and disabled people and people who rely on cash. It is really short sighted and regressive...” Bingley passenger

“Most ticket machines can't accept cash - again, sometimes I prefer to pay that way. And are we really saying to people without a bank card 'sorry you can't use rail'?” Mossley Hill and Windermere passenger

“... I do not have a credit or debit card and pay with cash only and having tried using the automated machines with cash. I have had 2 panic attacks in Leeds station and on one occasion burst into uncontrollable tears of frustration and humiliation while there were many people staring at me. One of the most uncomfortable mornings of my life.” Leeds passenger

“The suggestion to get a promise to pay ticket from the machine (if it's working) is likely to increase the number of people who travel without a valid ticket. Your document states that there's a conductor on each train but they don't regularly check tickets, either because your trains are invariably overcrowded, or the time between stations is so short they don't have time to check the train. How can I redeem a promise to pay ticket at a ticket office when you have closed them all? I don't intend to travel to Manchester Victoria or Oxford Road to do so.” Marple passenger

“...I believe this will have a negative impact on disabled people, older people and low income people who may be more likely to use cash to purchase tickets. I myself am trying to use cash more as a means of budgeting and this proposal will cause me difficulties.” Deansgate GMex 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, Northern's TVMs do not sell products such as Railcards, season tickets (longer than weekly) nor do they allow you to change tickets/bookings or provide a means of obtaining a cash refund. At present these are available at the ticket window.

“Ticket machines do not sell all types of tickets - and when you're doing something like making a bike reservation or rail + sail are useless.” Mossley Hill passenger

“I regularly use my local ticket office at Chorley for work and pleasure... I am outraged by the proposed decision to close the ticket office and that the full range of products will no longer be available, especially after 2pm.” Chorley passenger

“The staff are extremely caring and helpful to the general public and as elderly travellers they are there to help sort railcards and suitable tickets to enable us

to travel. Without their assistance it would be extremely difficult to travel to see family and friends.” Morpeth passenger

Your proposals (as revised) on 6 October stated:

- You will retain 18 ticket offices at key locations across the network.
- Cash paying customers will be able to continue to use cash for all Journeys by buy a ticket onboard from the conductor, providing they get a ‘Promise to Pay’ ticket at a TVM before they board.
- You are looking to introduce rail ticket retailing at c.4,000 local convenience outlets across the network. This will be via cash and card (subject to independent retailing conditions).
- Journey Makers will be able to assist with the buying of tickets and gateline staff (where applicable) will be able to retail commonly used tickets.
- The training package for Journey Makers will cover the core ticketing/product range. There will be local training for localised ticketing requirements (for example, Caledonian Sleeper and connections).
- Journey Makers will also be trained to be able to advise customers what retailing option is best suited for them, whether that is transition to digital, using station TVMs or purchasing via c.4000 local outlets.
- Journey Makers will have access (as they do now) to Team Leaders and ticketing specialists if they need support for very rare and niche ticketing solutions and all will be provided with a Journey Maker app which will provide fingertip ticketing guidance and advice.
- TVMs:
 - o All locations where the Ticket Office will close have at least one TVM in place.
 - o You recognise that a small number of TVMs need to be improved to support accessible needs and these improvements (where possible) are detailed in Northern’s Equality Impact Assessment (EQIA) and will be implemented before ticket offices are closed.
 - o You have analysed projected increases in ticket sales and are proposing to add additional TVMs at some stations (subject to business case approval).
 - o You are currently conducting a review of products and services and where products are not available on TVMs. This is part of wider industry discussions including TVM upgrades, current demand levels, TVM development time and relevant costings.
 - o TVMs will have video assist enabled to allow a remote colleague in the Customer Engagement Centre to assist with the transaction.

We acknowledge the retention of ticket offices at 18 stations and that, at these stations, passengers will be able to access the same range of products and services as they do now. We also acknowledge the potential for the video assist function on

TVMs and retailing via c.4000 local outlets (but understand it is not likely, at least initially, that they would offer the full product range).

However, we still have concerns with the following:

- i) Some core products and services will no longer be available at stations where the ticket office is closed.*

You have decided not to retain the ticket office machine (TOM) or to provide mobile/hand-held devices that can provide full functionality at 131 stations included in the consultation. The full range of products and services is available only at the 18 retained ticket offices.

We acknowledge that your TVMs already sell a wide range of tickets including Advance Purchase, Rovers and Rangers, Duo, Plusbus and the national concessions for disabled people. However, there are products and services that will not be available from a TVM, or on board the train. We are particularly concerned that passengers will not be able to buy Railcards at stations (other than at the 18 retained ticket offices outlined above). Railcards are a key way in which rail travel is made more affordable. While the majority may be fulfilled online, not everyone is willing or able to buy them this way. It will also no longer be possible to obtain cycle reservations, change a booking, use rail vouchers or obtain a photocard for season tickets at the station.

We also remain concerned about passengers who are reliant on cash. We acknowledge that some products could be purchased on board the train using cash (providing the passenger obtains a Promise to Pay first) but we note that only nine TVMs accept cash. As mentioned, it will not be possible to buy a railcard for cash. Nor will passengers be able to buy Advance Purchase tickets for cash. These are two important ways of making travel more affordable. It is also not clear how passengers without bank accounts would receive compensation if their train is delayed. We acknowledge that these issues exist today at stations where there is no ticket office. However, the TSA terms of reference refer to 'improvements in quality of service' and it is hard to see how removing cash services from more stations could be seen as an improvement.

In addition to the above concerns, we have also received representations highlighting concerns that Advance tickets for travel on the same day (APOD tickets) are not currently available from ticket offices. This means that passengers currently purchasing tickets at the station cannot necessarily get the best value fare for their journey from the ticket office, for some journeys a better value fare is currently only available at the station from the TVM. This puts those who cannot use TVMs at a disadvantage and at risk of paying more to travel than they need to. Ticket offices should offer the full range of fares and products

that are available at the station so that passengers can have confidence when using the ticket office they can get the best value fare.

Finally, we are aware of an industry wide initiative for the national concessions for disabled people which could involve people eligible for the concession being provided with a Disabled Persons Railcard instead. We believe that discussions on this need to involve the Disabled Persons Transport Advisory Committee (DPTAC) and disabled people/representative groups. In the meantime, these concessions would still need to be made available to passengers.

Conclusion

Objection 1: We are not satisfied that passengers will retain easy access to key products (other than at the 18 stations that will retain ticket offices).

Objection 2: We are not satisfied that passengers reliant on cash will be able to access the railway in the same way as now (again, other than at the 18 stations that will retain ticket offices).

Recommendation 1: That DPTAC, disabled people and representative groups should be involved in any discussions to replace the national concessionary fares for disabled passengers with an alternative product.

Recommendation 2: That Northern makes Advance tickets for travel on the same day (APOD tickets) available from the ticket office so that passengers that cannot use a TVM are not disadvantaged, and all passengers can have confidence when using the ticket office they can get the best value fare.

ii) Retail capacity at the station

While a Journey Maker may be able to help people use a TVM, in most instances they do not retain the ability to actually issue a ticket. Therefore, removing ticket windows reduces the number of 'points of sale' resulting in higher demand on the remaining TVMs.

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 reasonable levels of sales. You have provided assurances that the TVM capacity will be sufficient to cope with demand and that you "*have in storage ticket machines that can be deployed and installed if needed across the network. We also have the option to relocate some of the TVM fleet to high volume locations as needed and assessed on customer 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 remain concerned at the lack of queuing time metric at TVMs. It would be no more acceptable for a person to miss a train while queuing at a TVM than it would be if queueing at a ticket office. Introduction of a robust metric and reporting regime for TVM queuing (based on the existing standards at ticket office windows) would create a 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 expectations not be correct.

Conclusion

Objection 3: 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 (other than the 18 stations that will retain ticket offices).

iii) Retail Staffing hours

There are two aspects to Northern’s revised proposals:

- those relating to proposals to close ticket offices completely.
- those where a ticket office will be retained but the hours changed.

Where the proposal is to close ticket offices

The Rail Minister said: “the Secretary of State and I have been clear in our expectation that no stations that are currently staffed will be unstaffed as a result of the reform. I have made the additional point about the hours not changing materially either, with staff still being there to provide assistance and additional support for those who need and want it. That would include advice on tickets and assistance in buying them”.

However, it is immediately clear that there are 53 stations that would no longer be permanently staffed as a result of this proposal (see Annex 2 - list A). We understand some of the arguments surrounding these stations and that operating hours reflect historical levels of demand rather than current needs.

However, this clearly contradicts the Minister's public statement that "no stations that are currently staffed will be unstaffed as a result of the reform". As a result, we feel we have no option but to object to the proposal at these 53 stations.

At 72 stations the ticket office will close but staff would be redeployed for the same hours as before (see Annex 2 - list B). However, we note that staffing on a Sunday would no longer be guaranteed and would instead be provided on a data and resource-led basis. This would apply to 35 of these 72 stations (not all were originally staffed on a Sunday) – see Annex 2 list C.

We note that staffing would be data or resource led in future. However, this gives no guarantees or certainty to passengers at those stations – they will not know whether the station will be staffed or not.

In both instances this would mean that passengers lose a permanent, physical staff presence at the station – either all day or on Sundays. This will have an impact on the provision of specialist retail advice, the provision of information (including during disruption), and perceptions of personal security at the station. This would also have an impact on disabled passengers' ability to 'turn up and go'. While in many cases staff on the train will be able to assist passengers on and off the train, they are unlikely to be able to fully assist with journey planning, ticket purchase or getting to and from the platform in the first place. Removing staffing on a Sunday would not represent an improvement in quality of service for passengers.

At six stations we note that staffing hours would be extended based on the accessibility requirements of active barrow crossings at those stations (see Annex 2 list D).

Conclusion

Objection 4: We object to proposals to remove fixed staffing at 53 stations (see Annex 2 list A for the specific stations)

Objection 5: We object to proposals to remove a permanent fixed staffing presence on Sundays. This applies to 35 stations that currently have ticket offices open on a Sunday (see Annex 2 list C).

Where the proposal is to retain ticket offices but to change their opening hours: 18 stations are to retain ticket offices but the hours of operation are proposed to change (see Annex 2 list F).

We have analysed proposals, looking at sales levels and availability of other staff, including those able to provide support for disabled people. Having analysed proposals, we do not object to the following stations:

- Blackburn: the proposals increase staffing hours.
- Hartlepool: the proposals increase staffing hours.
- Harrogate: the ticket office would close at 1800 rather than 1900 Mon-Sat and at 1700 rather than 1800 on Sunday. There are low sales during these periods and there are other staff available at the station to provide accessibility support.
- Salford Crescent: the ticket office would close at 1800 Mon-Sat rather than 2145 but would open an hour longer on Sunday. There are very low sales during the period the ticket office will be closed and there are other staff available at the station to provide accessibility support.

We object to the following stations as we believe that there are sufficient sales to justify additional hours of staff availability to support and advise passengers on ticket purchases:

- Barrow in Furness: 0500-0600 Mon-Fri
- Blackpool North: 1800-1900 Mon-Sat; and 1700-1800 Sunday
- Bolton: 1800-2000 Mon-Sat
- Bradford Interchange: 1800-2000 Mon-Sat; and 1700-1900 Sunday
- Leeds: 0500-0600 and 2200-2300 Mon-Fri; 0500-0600 and 2200-2400 Saturday; 0700-0800 and 2100-2300 Sunday
- Liverpool Lime Street: 0500-0600 and 2200-2300 Mon-Fri; 0500-0600 and 2200-2400 Saturday; 0700-0800 and 2100-2200 Sunday
- Manchester Oxford Road: 1800-2000 Mon-Fri; 1800-2030 Saturday; 1700-1900 Sunday
- Manchester Victoria: 1800-2200 Mon-Fri; 1800-2200 Saturday; 0800-0900 and 1700-2100 Sunday
- Rochdale: 1800-1900 Saturday
- Warrington Central: 1800-1900 Mon-Fri; 1800-2000 Saturday
- Wigan Wallgate: 1800-1900 Saturday

We also object to the following stations on the grounds that they represent a reduction in the hours in which accessibility support is available. There are other staff at the station after the time the ticket office is to close, but they do not provide accessibility support.

- Glossop
- St Helens Central
- Skipton.

Conclusion

Objection 6: We believe additional staffing hours (as above) should be provided for: Barrow in Furness, Blackpool North, Bolton, Bradford Interchange, Leeds, Liverpool Lime Street, Manchester Oxford Road, Manchester Victoria, Rochdale, Warrington Central and Wigan Westgate.

Objection 7: We object to proposals at the following stations as they represent a reduction in the hours at which accessibility support is available: Glossop, St Helens Central and Skipton.

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.

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. In the original proposal many stations would have seen a significant reduction in staff presence. This would have had 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.

"As a deaf person, I rely on being able to speak to staff within the enclosed environment of the ticket office, away from the noise of the platform and surrounding area, and where the microphone offers increased clarity. If staff are placed on platforms only, clear communication would be impossible. Hearing aids amplify all sounds – not just speech – so I would struggle to follow a conversation with the competing sounds of trains, traffic and other passengers..." Greenfield passenger

"Please add my comments re the closure of the Hebden bridge ticket office. This ticket office does seem to have regular use. My son has a learning disability and autism has recently started using the trains on a regular basis. He can request his own ticket from the ticket office which is great for his communication skills and learning how to do regular day to day things plus encouraging him to have independence with travel. Closing the ticket office will stop this opportunity..." Hebden Bridge passenger

"...my daughter who has Autism and linked anxiety, she uses the ticket office and this enables her to travel. Due to her anxiety and special needs she does not like to book on line but needs the reassurance of a person helping her to

plan the journey and pay safely. By removing this service I know she will be forced to travel less, her life is limited enough as it is...”

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.

“I have Dyspraxia which makes it very hard for me to find my way around and to find which platform my train goes from. I often find I need to ask the ticket office for advice to where I can access the platform and where the platform is. I find the staff very helpful and it would be much harder for me to find these things out for myself as I find it extremely difficult to read the timetables at the station...” Harrogate passenger

Northern’s proposals (as revised) stated:

- “Customers with accessibility needs will continue to be supported to be able to access rail services in line with our Accessible Transport Policy.”
- “Journey Makers will be trained and encouraged to be visible and proactive in their customer engagement and it should be noted that the huge majority of Northern’s stations are CAT Es (ORR station sizing) stations and do not have a large footprint.” [Category E is ‘small staffed’]
- “Customers will be able to gain additional support via the following:
 1. By phone – to the Northern contact centre
 2. Help points - staffed through the contact centre
 3. TVM - including Video Assist where available
 4. Online - via social media/email/web chat.”In addition, at a number of stations there will also be gateline and dispatch staff available who are unaffected by the current proposals.
- Branded print and digital communication will be present to ensure customers know how to get assistance. This may include signposting to passenger assistance meeting points (where applicable), signage displaying journey maker operating times, self-serve tools such as the website chatbot, TVM assist or telephone numbers. As well as sign posting for help points if required.
- All frontline staff receive continuous disability awareness training, this will be further enhanced through the Journey Maker training, and the use of sunflower lanyards and other recognised schemes is well embedded throughout the business. Internal training is supported by disability action groups.

- “Where applicable we already have dedicated Passenger Assist meeting points and where these are currently located at ticket offices that won’t be retained, we will work with our Northern Accessibility User Group to relocate (if needed) to the most optimal position.”

We acknowledge that Northern has a number of unstaffed stations already and so has procedures in place to provide help and assistance, and that onboard staff will assist with boarding and alighting of trains.

However, we are concerned that at 53 stations where there are currently ticket office staff, along with 35 which are currently staffed on Sundays, there will not be a permanent staff presence and any staff deployed will be done so according to data analysis and customer need. Where staffing hours are reduced this would have an impact on disabled passengers’ ability to ‘turn up and go’. While in many cases staff on the train will be able to assist passengers on and off the train, they are unlikely to be able to fully assist with journey planning, ticket purchase or getting to and from the platform.

You mention briefly in your revised proposal that Welcome Points are to be introduced and 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 have sought 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 instance, would this also function as the meeting point for passengers who have booked Passenger Assistance).
- Whether induction loops would be fitted.

It is an important principle that people affected by a proposal should have a say on that proposal: “nothing about us without us”. 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 desk 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. 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.

Conclusion

Objection 8: We believe that removing a fixed staff presence (at 53 stations completely and at 35 on Sundays) would have an impact on disabled passengers' ability to 'turn up and go' at these stations (see Annex 2 list A and C for the specific stations).

Objection 9: We believe that there must be further engagement (as above) on the design, location and implementation of Welcome Points.

Objection 10: We believe that the Welcome Point concept must be piloted and reviewed before any changes to ticket offices take place.

Recommendation 3: We also note that in your amended proposals you state that you "...are planning to extend staffing hours at locations where there is an accessibility need." and which refers to the six stations (see Annex 2 list D for the specific stations) which have a barrow crossing. We acknowledge this as a positive step in terms of accessibility and whatever the outcome of this consultation, we would encourage you to retain these proposed increased staffing hours in the interests of passengers.

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 value 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.

"I will be impacted through the effect on members of my family, who include elderly people(...)Their lives will be made more difficult and unpleasant. They will be unable to buy tickets online, and they will not know how to find a member of staff at a busy station to buy one; nor will they find it easy to do so, with limited mobility and vision." Horsforth passenger

"Although Northern TVMs can issue all types of tickets they do not give out journey itineraries, currently this is provided by booking office staff." Worksop passenger

Northern's proposals (as revised) stated:

- Journey Makers will have portable tablet devices with access to all relevant information to assist customers.
- You are conducting a cost analysis into Journey Makers having the ability to print off items such as timetables for passengers at stations.
- Northern will continue to display timetables and leaflets for passengers. This will include local travel information and other local forms of transport if applicable. Local solutions will be implemented.
- 109 of the 149 impacted stations have help points and these are accessible and are sited at different locations throughout the station. Help point calls go through to the Customer Experience Centre (CEC) (0600-2300) or via the control centre which is staffed 24/7. CEC and Control centre staff can contact a member of station team directly.
- Where Help Points are not present other customer assistance mitigations are currently in place and working. This includes:
 - o TVM video assist (where available)
 - o Contacting the Customer Experience Centre by phone and email
 - o Contacting the social media team
 - o A conductor on every train
 - o Other station-based staff, such as dispatch staff.

We remain concerned that at 53 stations where there are currently ticket office staff, along with 35 which are currently staffed on Sundays, there will not be a permanent staff presence and any staff deployed will be done so according to data analysis and customer need. Where staffing hours are reduced this would have an impact on passengers' access to journey planning information, particularly during periods of disruption.

Conclusion

Objection 11: We believe that removing a fixed staff presence (at 53 stations completely and at 35 on Sundays) would have an impact on passengers' access to journey planning information, particularly during periods of disruption at these stations (see Annex 2 list A and C for the specific stations).

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:

"...Atherton Station is the nearest main station to me with Hag Fold, both can be intimidating due to isolation and antisocial behaviour. Having someone in a

ticket office provides reassurance someone is there for assistance.” Atherton and Hag Fold passenger

“...Ticket offices provide security for older people and women travelling solo particularly on dark evenings. There have been recent incidents at Saltaire station- already without a ticket office. Removing the ticket office at Bingley would be a retrograde step for safety and accessibility.” Bingley passenger

“I wouldn’t want to approach a person on a concourse as a solo travelling female, particularly later in the evening. A hi vis vest could be all it takes to impersonate a staff member. Although staff are trained and I’m sure, vetted, the removal of physical barriers between people may change behaviour and interactions between staff and customers.” Liverpool Lime Street 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.

Northern’s proposals (as revised) stated:

- You will work with British Transport Police around suitable mitigations where crime issues are identified.

- Northern works proactively with British Transport Police and a team of Travel Safe Officers to conduct regular patrols and safety assessments and we have continued to invest in CCTV across our station estate.
- Northern's CCTV estate is currently undergoing a full overhaul in a phased approach prioritised by footfall and risk parameters. This will ensure that all stations subject to that overhaul will be enhanced, have modern CCTV capability and can be remotely accessed.

We are also aware that the Department for Transport and British Transport Police have agreed that train companies 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 that you are maintaining the original staffing times at 72 stations and enhancing staffing at six stations (in relation to barrow crossings). However, we remain concerned that at 53 stations where there are currently ticket office staff, along with 35 which are currently staffed on Sundays, there will not be a permanent staff presence and any staff deployed will be done so according to data analysis and customer need. Where staffing hours are reduced this would have an impact on passengers' perceptions of personal security.

Conclusion

Objection 12: We believe that removing a fixed staff presence (at 53 stations completely and at 35 on Sundays) would have an impact on passengers' sense of personal security at these stations (see Annex 2 list A and C for the specific stations).

Recommendation 4: There should be no implementation of proposals until the crime and vulnerability risk assessments 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.

"The ticket office closure would severely restrict their right to travel, also people with disabilities or the elderly may need assistance to safely move around the station and to board the train. Also, with such a wide variety of ticketing options

and journey planning many could well purchase incorrect tickets for their journey and incur extra expenses and delays to their journey.” Keighley passenger

“Not everyone knows the restrictions on peak and off peak or how to get to places, find cheap tickets etc. (...) For example just now, I bought my ticket at the booking office. The ticket machine still shows off peak ticket yet this train at 1656 to Manchester is peak. I could have been fined for buying the wrong ticket if I had got it from the machine. The lady in booking office knows it is peak between 4pm and 6.30pm.” Ashton Under Lyne passenger

Northern's proposals (as revised) stated:

- That 'Buy Before You Board' and 'Promise to Pay' messaging is “well publicised both at stations and online and customers will always be encouraged to be in possession of ticket before boarding a train.”
- For customers unable to purchase tickets at stations, Promise to Pay will continue to be offered by TVMs and Journey Makers/station staff will assist in accessing these from TVMs.
- National Rail Conditions of Travel already provide the conditions under which a passenger may travel without a ticket without incurring a penalty fare.
- Northern's conductors are able to access live information on the status of Northern's TVM fleet and that they also have the discretion when retailing tickets to customers.

The National Rail Conditions of Travel set out the circumstances in which a person can board without a valid ticket: where there are no facilities to buy, or they are not working; where a TVM will not accept your preferred method of payment (card or cash); or where you have a disability and facilities at the station are not accessible to you. They do not provide an explicit assurance that you can board a train if you cannot get the *type* of ticket you want.

However, we acknowledge that Northern's TVMs offer a wide range of tickets and that this will provide passengers with the opportunity to buy before they board. We also acknowledge that Promise to Pay provides a means by which passengers can pay onboard with cash if they need to. This would place an even greater importance on Promise to Pay and we feel it would be helpful to publicise its availability, especially at stations where a ticket office was to close or where staff were no longer present.

We believe these mitigations will minimise the risks of passengers being penalised for boarding without a ticket.

Conclusion

Recommendation 5: That there is a renewed effort to publicise Promise to Pay, especially at any stations where the ticket office would be closed or staff are no longer present.

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

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. It's important that any changes to ticket retailing at stations should not mean any reduction in access to key passenger facilities.

“Another issue (...) is the availability of waiting rooms/toilets. When I enquired about this, I was told they would be opened 24hours – I don't feel this will work because without staff being on site (...) these facilities will be abused and subsequently closed. This is another reduction in service particularly the loss of the toilet facilities. You may say ‘use the toilet on the train’ but I've travelled on many trains where the toilets are broken – indeed I've known trains to be held at Hebden Bridge so passengers can use the toilet as the train one was out of service.” Hebden Bridge passenger

Northern's proposals (as revised) stated:

- All station facilities that are currently provided during ticket office opening hours will remain open during those hours.
- You are also exploring technological solutions whereby facilities could be made available for longer at some stations.
- The majority of Northern's stations (318) are currently unstaffed and there is no evidence to suggest that either crime rates or the perception of crime is higher at these locations.
- Facility alarms will be diverted to either the Customer Experience Centre or other identified partners. The welfare, wellbeing and protection of customers will be maintained.

We acknowledge your commitment that all facilities that are currently provided will remain open for the same hours. However, where staff are not at the station it is unclear how facilities will be monitored and maintained and how anti-social behaviour or misuse of those facilities will be targeted.

Conclusion

Objection 13: We are not yet clear how facilities will be monitored and maintained, and any misuse of facilities targeted, at stations where there will no longer be a fixed staffing presence. (Annex 2, list E lists stations in question)

6g) Other issues

Transport Focus's published [criteria](#) stated that we would also consider any other issues raised by members of the public during the consultation. Two key areas 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.

Your letter of 6 October stated that *"Should our data led approach to Journey Maker staffing indicate the staffing is to be revised (permanently), any future changes will be delivered in line with public sector consultation duties and via our accessible travel policy. Northern will continue to adhere to Sch 17. TSA arrangements for the 18 retained ticket offices."*

We are aware of industry suggestions that the Accessible Travel Policy (ATP) process – overseen by the Office of Rail and Road (ORR) – provides a review mechanism. 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 14: 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 [[Evidence](#) to the House of Commons Transport Committee hearing – 13 September 2023].

Northern's proposal makes it clear that several mitigations are subject to funding. For example, exploring a technological solution to allow facilities stay open for longer than now, upgrading CCTV systems, providing extra TVMs.

There would also be a need for a clear, co-ordinated communication plan surrounding any changes. This would need to set out clearly what was being done and by when. 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 6: It will be essential that there is a clear, co-ordinated communication plan to inform passengers.

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 (TVMs). 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 15: 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: We are not satisfied that passengers will retain easy access to key products (other than at the 18 stations that will retain ticket offices).

Objection 2: We are not satisfied that passengers reliant on cash will be able to access the railway in the same way as now (again, other than at the 18 stations that will retain ticket offices).

Objection 3: 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 (other than the 18 stations that will retain ticket offices).

Objection 4 – We object to proposals to remove fixed staffing at 53 stations (see Annex 2 list A for the specific stations).

Objection 5 – We object to proposals to remove a permanent fixed staffing presence on Sundays. This applies to 35 stations that currently have ticket offices open on a Sunday (see Annex 2, list C).

Objection 6: We believe additional staffing hours (as above) should be provided for: Barrow in Furness, Blackpool North, Bolton, Bradford Interchange, Leeds, Liverpool Lime Street, Manchester Oxford Road, Manchester Victoria, Rochdale, Warrington Central and Wigan Wallgate.

Objection 7: We object to proposals at the following stations as they represent a reduction in the hours at which accessibility support is available: Glossop, St Helens Central and Skipton.

Objection 8: We believe that removing a fixed staff presence (at 53 stations completely and at 35 on Sundays) would have an impact on disabled passengers' ability to 'turn up and go' at these stations (see Annex 2 list A and C for the specific stations).

Objection 9: We believe that there must be further engagement (as above) on the design, location and implementation of Welcome Points.

Objection 10: We believe that the Welcome Point concept must be piloted and reviewed before any changes to ticket offices take place.

Objection 11: We believe that removing a fixed staff presence (at 53 stations completely and at 35 on Sundays) would have an impact on passengers' access to

journey planning information, particularly during periods of disruption at these stations (see Annex 2 list A and C for the specific stations).

Objection 12: We believe that removing a fixed staff presence (at 53 stations completely and at 35 on Sundays) would have an impact on passengers' sense of personal security at these stations (see Annex 2 list A and C for the specific stations).

Objection 13: We are not yet clear how facilities will be monitored and maintained, and any misuse of facilities targeted, at stations where there will no longer be a fixed staffing presence. (Annex 2, list E lists stations in question).

Objection 14: An alternative engagement/consultation mechanism is required for any future material changes in staffing at a station.

Objection 15: There must be a robust monitoring and review mechanism in place to review any changes. This must include queueing time metrics.

Proposals to close ticket offices

Station	Decision	Grounds for objection (see text above)
Accrington	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Adlington	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Alderley Edge	Objection	1, 2, 3, 9, 10, 15
Alnmouth	Objection	1, 2, 3, 9, 10, 15
Appleby	Objection	1, 2, 3, 9, 10, 15
Ashton-under-Lyne	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Atherton	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Barnsley	Objection	1, 2, 3, 9, 10, 15
Beverley	Objection	1, 2, 3, 9, 10, 15
Bingley	Objection	1, 2, 3, 9, 10, 15
Birchwood	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Bradford Forster Square	Objection	1, 2, 3, 9, 10, 15
Bramhall	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Bredbury	Objection	1, 2, 3, 9, 10, 15
Bridlington	Objection	1, 2, 3, 9, 10, 15
Brinnington	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
Broad Green	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 15
Broadbottom	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Bromley Cross	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Buckshaw Parkway	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Burnage	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Burnley Central	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Burnley Manchester Road	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Buxton	Objection	1, 2, 3, 9, 10, 15
Chassen Road	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
Cheadle Hulme	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Chorley	Objection	1, 2, 3, 9, 10, 14, 15
Congleton	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Cross Gates	Objection	1, 2, 3, 9, 10, 15
Daisy Hill	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
Davenport	Objection	1, 2, 3, 9, 10, 15
Deansgate	Objection	1, 2, 3, 9, 10, 15
Dinting	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
Disley	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
Driffield	Objection	1, 2, 3, 9, 10, 15
Earlestown	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
East Didsbury	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Eccles	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
Ecclestone Park	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15

Edge Hill Liverpool	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
Farnworth	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
Flixton	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
Garforth	Objection	1, 2, 3, 9, 10, 15
Garswood	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Gatley	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Glazebrook	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
Goole	Objection	1, 2, 3, 9, 10, 15
Gorton	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
Grange-over-sands	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Greenfield	Objection	1, 2, 3, 9, 10, 15
Guide Bridge	Objection	1, 2, 3, 9, 10, 15
Guiseley	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Hadfield	Objection	1, 2, 3, 9, 10, 15
Hag fold	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
Hale	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
Halewood	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
Halifax	Objection	1, 2, 3, 9, 10, 15
Handforth	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
Hattersley	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Hazel Grove	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Heald Green	Objection	1, 2, 3, 9, 10, 15
Heaton Chapel	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 15
Hebden Bridge	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Hexham	Objection	1, 2, 3, 9, 10, 15
Hindley	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
Holmes Chapel	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Horsforth	Objection	1, 2, 3, 9, 10, 15
Hough Green	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Huyton	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Ilkley	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Keighley	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Kirkham & Wesham	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Knutsford	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Lea Green	Objection	1, 2, 3, 9, 10, 15
Levenshulme	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 15
Leyland	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Littleborough	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Lostock Parkway	Objection	1, 2, 3, 9, 10, 15
Marple	Objection	1, 2, 3, 9, 10, 15
Mauldeth Road	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 15
Meadowhall	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 15
Menston	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15

Mexborough	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Morecambe	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Morpeth	Objection	1, 2, 3, 9, 10, 15
Mossley Hill	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 13, 14, 15
Mossley	Objection	1, 2, 3, 9, 10, 14, 15
New Mills Central	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 13, 14, 15
New Mills Newtown	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 13, 14, 15
New Pudsey	Objection	1, 2, 3, 9, 10, 14, 15
Newton for Hyde	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Newton-le-Willows	Objection	1, 2, 3, 9, 10, 14, 15
Northwich	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Parbold	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 13, 14, 15
Poulton-le-Fylde	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 13, 14, 15
Poynton	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 13, 14, 15
Prescot	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 13, 14, 15
Rainhill	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 13, 14, 15
Redcar Central	Objection	1, 2, 3, 9, 10, 14, 15
Reddish North	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 13, 14, 15
Roby	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 13, 14, 15
Romiley	Objection	1, 2, 3, 9, 10, 14, 15
Rose Hill (Marple)	Objection	1, 2, 3, 9, 10, 14, 15
Rotherham Central	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 13, 14, 15
Salford Central	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 13, 14, 15
Sandbach	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 13, 14, 15
Settle	Objection	1, 2, 3, 9, 10, 14, 15
Shipley	Objection	1, 2, 3, 9, 10, 14, 15
St Annes-on-the-Sea	Objection	1, 2, 3, 9, 10, 14, 15
St Helens Junction	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 13, 14, 15
Sunderland	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 13, 14, 15
Swinton (Greater Manchester)	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Swinton (Yorkshire)	Objection	1, 2, 3, 9, 10, 14, 15
Thatto Heath	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Thorne North	Objection	1, 2, 3, 9, 10, 14, 15
Todmorden	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 13, 14, 15
Ulverston	Objection	1, 2, 3, 9, 10, 14, 15
Urmston	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 13, 14, 15
Walkden	Objection	1, 2, 3, 9, 10, 14, 15
Warrington West	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 13, 14, 15
Wavertree Technology Park	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
West Allerton	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Whaley Bridge	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15

Whiston	Objection	1, 2, 3, 9, 10, 14, 15
Whitehaven	Objection	1, 2, 3, 9, 10, 14, 15
Widnes	Objection	1, 2, 3, 9, 10, 14, 15
Wilmslow	Objection	1, 2, 3, 9, 10, 14, 15
Windermere	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Woodsmoor	Objection	1, 2, 3, 4, 8, 9, 10, 11, 12, 14, 15
Workington	Objection	1, 2, 3, 5, 8, 9, 10, 11, 12, 14, 15
Worksop	Objection	1, 2, 3, 9, 10, 14, 15.

Proposals to retain ticket offices but to reduce hours.

Station	Decision	Grounds for objection (see text above)
Barrow-in-Furness	Objection	6
Blackburn	No objection	
Blackpool North	Objection	6
Bolton	Objection	6
Bradford Interchange	Objection	6
Glossop	Objection	7
Hartlepool	No objection	
Harrogate	No objection	
Leeds	Objection	6
Liverpool Lime Street	Objection	6
Manchester Oxford Road	Objection	6
Manchester Victoria	Objection	6
Rochdale	Objection	6
Salford Crescent	No objection	
Skipton	Objection	7
St Helens Central	Objection	7
Warrington Central	Objection	6
Wigan Wallgate	Objection	6

Transport Focus 31 October 2023

Annex

- 1 - Total objections received for Northern
- 2 - Summary of stations in each category
- 3 - Transport Focus's letter of 6 September
- 4 - Northern's response to that letter

Annex 1: Total objections received for Northern

Station specific objections:

Accrington	210
Adlington Lincs	33
Alderley Edge	42
Alnmouth	480
Appleby	121
Ashton Under Lyne	68
Atherton	250
Barnsley	285
Barrow In Furness	100
Beverley	104
Bingley	535
Birchwood	38
Blackburn	63
Blackpool North	161
Bolton	190
Bradford Forster Square	74
Bradford Interchange	143
Bramhall	42
Bredbury	26
Bridlington	172
Brinnington	13
Broad Green	106
Broadbottom	47
Bromley Cross	136
Buckshaw Parkway	37
Burnage	18
Burnley Central	46
Burnley Manchester Road	92
Buxton	143
Chassen Road	4
Cheadle Hulme	121
Chorley	295
Congleton	84
Cross Gates	100
Daisy Hill	42
Davenport	95
Deansgate G-Mex	11
Dinting	8
Disley	12

Driffield	44
Earlestown	52
East Didsbury	34
Eccles	162
Eccleston Park	13
Edge Hill	22
Farnworth	16
Flixton	10
Garforth	87
Garswood	25
Gatley	24
Glossop	117
Goole	26
Gorton	15
Grange Over Sands	104
Greenfield	365
Guide Bridge	44
Guiseley	189
Hadfield	111
Hagfold	10
Hale	15
Halewood	37
Halifax	1469
Handforth	41
Harrogate	156
Hartlepool	76
Hattersley	23
Hazel Grove	403
Heald Green	50
Heaton Chapel	163
Hebden Bridge	693
Hexham	501
Hindley	32
Holmes Chapel	55
Horsforth	265
Hough Green	28
Huyton	74
Ilkley	269
Keighley	590
Kirkham & Wesham	46
Knutsford	35
Lea Green	82
Leeds	656

Levenshulme	274
Leyland	117
Littleborough	107
Liverpool Lime St	865
Lostock	35
Manchester Oxford Road	76
Manchester Victoria	167
Marple	90
Mauldeth Road	38
Meadowhall	96
Menston	164
Mexborough	30
Morecambe	76
Morpeth	533
Mossley Hill	118
Mossley Manchester	53
New Mills Central	81
New Mills Newtown	32
New Pudsey	118
Newton For Hyde	22
Newton Le Willows	100
Northwich	684
Parbold	42
Poulton Le Fylde	319
Poynton	44
Prescot	31
Rainhill	89
Redcar Central	193
Reddish North	46
Roby	33
Rochdale	100
Romiley	58
Rose Hill Marple	47
Rotherham Central	93
Salford Central	28
Salford Crescent	34
Sandbach	42
Settle	546
Shipley	385
Skipton	292
St Annes On The Sea	106
St Helens Central	50
St Helens Junction	18

Sunderland	819
Swinton (Manchester)	31
Swinton (South Yorks)	19
Thatto Heath	22
Thorne North	37
Todmorden	462
Ulverston	270
Urmston	70
Walkden	28
Warrington Central	91
Warrington West	84
Wavertree Technology Park	46
West Allerton	31
Whaley Bridge	55
Whiston	41
Whitehaven	250
Widnes	78
Wigan Wallgate	125
Wilmslow	193
Windermere	148
Woodsmoor	25
Workington	225
Worksop	75
Total	20,830

In addition to the 20,830 station specific objections listed above Transport Focus also received 39,509 responses objecting to Northern’s proposals in general.

Total Northern objections: 60,339

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 Northern’s proposals:

Accrington	20
Alnmouth	202

Ashton Under Lyne	76
Beverley	545
Bingley	3193
Bradford Forster Square	749
Bradford Interchange	532
Bredbury	165
Bridlington	3758
Brinnington	247
Burnley	764
Chorley	758
Congleton	310
Eccles	207
Farnworth	146
Garforth	460
Garswood	184
Greenfield	870
Guide Bridge	643
Guiseley	1054
Hadfield	840
Halifax	5038
Harrogate	577
Heald Green	230
Hebden Bridge	1972
Hexham	678
Horsforth	316
Huyton	370
Ilkley	2237
Keighley	3577
Leeds	172
Levenshulme	220
Leyland	964
Marple	736
Meadowhall	350
Menston	1076
Morecambe	168
Morpeth	837
Mossley	240
New Mills Central	46
Newton Le Willows	1039
Poulton Le Fylde	527
Prescot	850
Rainhill	322
Redcar Central	310

Reddish North	282
Rotherham Central	479
Settle	335
Shipley	964
Skipton	138
St Helens Junction	305
Sunderland	801
Thorne North	141
Todmorden	395
Walkden	34
Wavertree Technology Park	548
Whiston	656
Whitehaven	359
Widnes	357
Worksop	351.

We received copies of the following online petitions:

Change.org - <https://www.change.org/p/save-our-railway-ticket-offices>

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

We are also aware of the following online petitions:

Parliament - <https://petition.parliament.uk/petitions/636542>

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.

Annex 2: Summary of stations in each category

List

A - 53 stations that will have no fixed staffing.

B - 72 stations to be staffed by Journey Makers for current staffed hours (but where deployment on Sundays is not guaranteed).

C - 35 stations on List B that have a ticket office open on Sunday's currently (and which may not be staffed in future if there is a move towards demand led staffing on Sundays).

D – Six stations with extended hours. These stations would have staff presence from first to last train to support the use of active barrow crossings.

E – 53 stations from List A and B that have facilities at the station (for example, toilets and waiting rooms).

F - 18 stations that will retain ticket offices.

List A: the 53 stations that will have no fixed staffing

Adlington
Ashton-under-Lyne
Birchwood
Bramhall
Brinnington
Broadbottom
Bromley Cross
Burnage
Burnley Central
Chassen Road
Congleton
Daisy Hill
Dinting
Disley
Earlestown
East Didsbury
Eccles
Eccleston Park
Edge Hill Liverpool
Farnworth
Flixton
Garswood

Gatley
Glazebrook
Gorton
Hag fold
Hale
Halewood
Handforth
Hattersley
Hindley
Holmes Chapel
Knutsford
Littleborough
Mauldeth Road
Mexborough
Morecambe
New Mills Central
New Mills Newtown
Newton for Hyde
Northwich
Parbold
Poynton
Reddish North
Roby
Salford Central
Sandbach
St Helens Junction
Swinton (Greater Manchester)
Urmston
West Allerton
Whaley Bridge
Woodsmoor.

List B: the 72 stations retaining current staffed hours but where deployment on Sundays not guaranteed

Accrington
Alderley Edge
Alnmouth
Atherton
Barnsley
Beverley
Bingley
Bradford Forster Square

Bredbury
Broad Green
Buckshaw Parkway
Burnley Manchester Road
Buxton
Cheadle Hulme
Chorley
Cross Gates
Davenport
Deansgate
Driffield
Garforth
Goole
Grange-over-sands
Greenfield
Guide Bridge
Guiseley
Heald Green
Heaton Chapel
Hebden Bridge
Hadfield
Halifax
Hazel Grove
Horsforth
Hough Green
Huyton
Ilkley
Keighley
Kirkham & Wesham
Lea Green
Levenshulme
Leyland
Lostock Parkway
Marple
Meadowhall
Menston
Morpeth
Mossley
Mossley Hill
New Pudsey
Newton-le-Willows
Poulton-le-Fylde
Prescot

Rainhill
Redcar Central
Romiley
Rose Hill (Marple)
Rotherham Central
Shipley
St Annes-on-the-Sea
Sunderland
Swinton (Yorkshire)
Thatto Heath
Todmorden
Walkden
Warrington West
Wavertree Technology Park
Whiston
Whitehaven
Widnes
Wilmslow
Windermere
Workington
Worksop.

**List C: 35 stations on List B that have a ticket office open on Sunday's now
(and which may not be staffed in future if there is a move towards demand led
staffing on Sundays)**

Accrington
Atherton
Broad Green
Buckshaw Parkway
Burnley Manchester Road
Cheadle Hulme
Chorley
Grange-over-Sands
Guiseley
Hazel Grove
Heaton Chapel
Hebden Bridge
Hough Green
Huyton
Ilkley
Keighley
Kirkham & Wesham

Lea Green
Levenshulme
Leyland
Meadowhall
Menston
Mossley Hill
Poulton le Fylde
Prescot
Rainhill
Rotherham Central
Sunderland
Thatto Heath
Todmorden
Warrington West
Wavertree Technology park
Whiston
Windermere
Workington.

List D: Six stations with extended hours. These stations would have staff presence from first to last train to support the use of active barrow crossings

Appleby
Bridlington
Hexham
Settle
Thorne North
Ulverston.

E: 53 stations in List A and B that have facilities open at the station presently

Accrington
Ashton under Lyne
Atherton
Birchwood
Bramhall
Broadbottom
Bromley Cross
Buckshaw Parkway
Burnage
Burnley Central
Burnley Manchester Road
Cheadle Hulme
Chorley

Congleton
East Didsbury
Eccleston Park
Garswood
Gatley
Grange over Sands
Guiseley
Hattersley
Hazel Grove
Hebden Bridge
Holmes Chapel
Hough Green
Huyton
Ilkley
Keighley
Kirkham & Wesham
Knutsford
Leyland
Littleborough
Menston
Mexborough
Morecambe
Mossley Hill
New Mills Central
New Mills Newtown
Parbold
Pouton le Fylde
Poynton
Prescot
Rainhill
Reddish North
Roby
Rotherham Central
Salford Central
Sandbach
St Helens Junction
Sunderland
Todmorden
Urmston
Warrington West.

List F: 18 stations that will retain ticket offices

Barrow-in-Furness

Blackburn

Blackpool North

Bolton

Bradford Interchange

Glossop

Harrogate

Hartlepool

Leeds

Liverpool Lime Street

Manchester Oxford Road

Manchester Victoria

Rochdale

Salford Crescent

Skipton

St Helens Central

Warrington Central

Wigan Wallgate.