Transport Focus Consultation Response
Proposed closure of Ticket Offices in Wealden (July 2023)

This consultation response represents Wealden District Council's comments regarding the Government and the Department for Transport's (DfT) planned closure of manned ticket offices within Wealden as part of a national programme to close many offices nationwide.

Wealden is serviced by two train operating companies, Southern and Southeastern Railways with both providers identifying ticket offices for closure. It should be noted that whilst Southeastern Railways does propose closures these lie outside the Wealden boundaries.

Table 1 – Proposed ticket offices to be closed within Wealden

SOUTHERN RAILWAYS
Berwick
Buxted
Crowborough
Pevensey & Westham
Polegate
Uckfield
Eridge

Should all these closures be undertaken there will be no manned ticket office throughout the entirety of the District.

Schedule 17 of the Ticketing and Settlement Agreement sets out the process that must be followed when train companies wish to close a ticket office. The train company must submit their proposals to the passenger watchdogs Transport.

Focus or in the case of any stations in London, London Travelwatch, who oversee the 21 day consultation over the proposed closures.

This 21 day consultation runs from 5th July to 26th July 2023.

The Ticketing and Settlement Agreement[1] states that Transport Focus can only object to the proposed closures where the proposal would fail to meet one or both of the following criteria:

1. 'The change would represent an improvement on current arrangements in terms of quality of service and/or cost effectiveness',
2. 'Members of the public would continue to enjoy the widespread and easy access to the purchase of rail products, notwithstanding the change'.

It is the opinion of Wealden District Council that the proposed closures of the stations identified in Table 1 fails to meet those criteria on the following grounds.

[1] Ticketing and Settlement Agreement

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Both the rail companies and Wealden District Council have a requirement under the Equality Act 2010 via the public sector Equality Duty to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Advancing equality means:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

Complying with this Duty is a legal requirement.

The Council considers that ticket offices provide a vital service to residents in Wealden and support passenger safety, security, and accessibility. Having a central place in the station for people requiring advice and assistance provides certainty and confidence for customers who may struggle to otherwise locate station staff.

The closure of all ticket offices within Wealden and significant number nationally, will place at a disadvantage those individuals that require additional assistance to undertake their journey. These might include those with disabilities both hidden and visible, those unable to read, elderly, non-English speakers, those with limited IT skills and those on lower incomes.

These proposed closures would appear to contravene the policies set out in the Equality Act 2010 by discriminating against certain sectors of our community in the assumption that they will be able to easily use the self-service machines to purchase their required ticket.

Furthermore, the complexity of the current ticketing system with multiple types and combinations of tickets available is already confusing. By removing the opportunity to speak to a highly knowledgeable individual available from a fixed and recognised location will increase levels of anxiety and uncertainty for many of our travellers pushing them towards alternative methods of transport or not travelling at all. It may also deter those wishing to travel by train due to the complicated nature of the tickets available and fear of not getting a fair (or cheapest) price for their journey.

On 24th July 2019 Wealden District Council unanimously approved a motion to declare a Climate Emergency.

Under the Climate Emergency Declaration, the Council committed to work towards achieving net-zero carbon emissions by 2050 or sooner for both the Council's own operations and the wider Wealden area, and to pursue efforts to bring this date forward if possible. This includes ensuring that the transition from car use to alternative travel methods such as bus, bike and rail is supported and enabled. It

should be noted that this target date for achieving net-zero emissions is being reviewed in order to see if it possible to move faster.

The closure of ticket offices, whilst discriminating against individuals with protected characteristics, will result in a tipping of the balance back in favour of the car as a primary choice for travel.

As a rural District with a constrained major road network it becomes essential to support and enable accessible and inclusive public transport. The removal of manned ticket offices is considered a step backwards in the Council's goal of achieving net zero carbon emissions by 2050, in line with the Governments own targets.

When compared to both the national and regional picture, the latest Census 2021 reveals that Wealden District has a significantly higher percentage of the population in the over 65-age group at 26.6%, a figure that has risen from 22.9% since the 2011 census. This age group is projected to rise to 33.6% by 2043 for Wealden which is notably higher than the national projection of 23.9%. This trend of a rising elderly population will require an adjustment in services to reflect the specific needs of this demographic group; a requirement that the proposed closures will fail to address.

Wealden District Council objects to the proposed closures of ticket offices both within Wealden and nationally as it believes that:

1. They do not represent an improvement on the current arrangements in terms or quality of service; and
2. They do not allow members of the public to continue to enjoy the widespread and easy access to the purchase of rail products; and
3. They do not comply with the requirements of the Equality Act 2010 by discriminating against those individuals living with hidden or visible disability, older people, people for whom English is not their first language, those that have limited literacy or IT skills and those on lower incomes; and
4. The do not support the Governments and Wealden District Councils climate change objectives.

In conclusion, the Council believes that ticket offices provide a vital service to residents in Wealden and support passenger safety, security, and accessibility. Having a central place in the station for people requiring advice and assistance provides certainty and confidence for customers who may struggle to otherwise locate station staff.

Not all residents are able to use ticket vending machines or online ticketing platforms for variety of reasons. Ticket office staff have a wealth of knowledge which ensures that customers get appropriate advice for their whole journey.

Council is concerned that the rushed closure of ticket offices will disproportionately affect disabled, deaf, blind, and older residents in Wealden – as well as those with poor literacy and IT skills or on lower incomes.

Wealden District Council requests that Transport Focus register these objections and object to the proposed closure of ticket offices within Wealden and nationally but in particular those relating to the Southern Railway group.

If the proposed closures are agreed, despite the objections submitted, the Council requests that improvements to ticket machines are undertaken to ensure they are fully accessible and can offer the cheapest fare available for a specified journey.