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Sent to:
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Ref: SWR Ticket Office Consultation
Date: 25/07/2023

Dear London TravelWatch representatives,

RE: London Borough of Hounslow response to South Western Railway's ticket office consultation

As part of the consultation for station changes, SWR are proposing to close all ticket offices at their stations. SWR has announced proposed alterations to four stations in the London Borough of Hounslow on the Hounslow Loop, these being at Brentford, Chiswick, Feltham, and Hounslow stations. The Hounslow Loop plays a vital role in connecting communities to the rail network from Feltham in the west to Chiswick in the east. The following response sets out the council's position and request for further information before any decision is taken.

We recognise that technology and the pandemic have changed the way we travel in many ways but there are still residents for whom in-person support is a necessary part of their journey and which could be the difference between them making a trip or not. Under the Equality Act 2010, private bodies carrying out public functions still have a responsibility to ensure equal access and treatment for all individuals, regardless of their protected characteristics. This proposal will disproportionately affect individuals with disabilities, the elderly, ethnic groups, lower-income backgrounds and those who are digitally excluded. These customers in particular may face barriers in navigating ticket machines or require assistance while travelling. This proposal will only serve to exacerbate existing inequalities in the borough with Feltham, Hounslow and Brentford stations being located in the 6 most deprived areas of the borough, therefore further disadvantaging the residents living there or travelling through those stations.

It is crucial for public bodies to consider these equality obligations and explore mitigation measures published in an Equality Impact Assessment (EqIA) that ensures equitable access to transport services for everyone in Hounslow. In the absence of an EqIA, the council is concerned that this proposal would have a significant adverse impact and SWR must be clear in how they intend to ensure adequate assistance remains in place at stations where it is proposed to remove



ticket offices and at times where there are currently staff available to assist. Until an EqlA has been submitted and appropriate mitigation measures put into place the council objects to the station change proposals.

While there are some suggested mitigation measures such as additional staff presence on days where this isn't currently available, the reverse is also the case where some services are being reduced or withdrawn. The council is concerned that these changes will have negative consequences for members of the community reliant on station ticket offices and the services they offer. We support having longer station staffing hours at Feltham but would need to see usage data to rationalise the reduction of staffing at Hounslow station where hours will be more than halved. Mondays will be unstaffed here as well as at Chiswick and the same is proposed for Fridays at Brentford.

The Hounslow Loop already has four stations which are currently unstaffed, with three of these located within the borough (Isleworth, Syon Lane and Kew Bridge) and Syon Lane and Isleworth stations are also located in the 6 most deprived wards in the borough. Proceeding with the proposed changes would mean increasing the gap between stations where consistent help is available if Feltham becomes the only station in the borough to retain multiple staff. This means that people would potentially have to travel further to visit a station where assistance can be provided if required. The proposal could also lead to longer wait times for those requiring support at stations where only one member of staff is present and for stations like Brentford where there are multiple entrances, the chances of finding assistance will be reduced if there is no longer a dedicated ticket office. For example, customers with sensory, cognitive, or mobility disabilities usually ask staff for assistance on and off trains.

The Council's Transport Strategy sets out targets for increasing the use of public transport in the borough. The proposed expansion of the Ultra Low Emission Zone to include Hounslow, combined with the cost-of-living crisis, means that many of the borough's residents will not be able to afford to own or travel by car. This means that ensuring public transport is fully accessible for everyone is even more crucial so that none of Hounslow's residents are prevented from making essential journeys. Additionally, 33% of households do not have access to or own a vehicle in the borough with Brentford East and Hounslow Central having at least 44% of residents with no car or van, making them heavily reliant on public transport. The council is unable to support a proposal that would potentially have a significant impact on these groups.

As well as providing direct help to those that need it, station staffing also plays a role in wider safety and personal security for everyone on the network including vulnerable members of society. Women's safety is a key issue across the country, which is not helped by these proposals, not only for passengers but for the staff who will be without a base should the ticket offices close. Furthermore, staffing helps to prevent and follow up on any misuse of the station or railway. For example, council



officers were recently informed of a serious incident at Isleworth Station where a group of secondary aged pupils crossed live tracks between platforms. This was reported to and followed up by the relevant school swiftly which wouldn't have been possible without staff working at the station. The fact that this happened at a currently unstaffed station where contractors are currently working also raises questions regarding these stations.

Although category 4 stations such as Isleworth, Syon Lane and Kew Bridge are beyond the scope of this consultation, we would like to raise that the context has changed for all three stations in recent years. The council is proud to have supported the implementation of Access for All schemes at Syon Lane (completed) and Isleworth (under construction), making the network more accessible for even more users. Both stations are currently unstaffed but would benefit from some staff presence to provide further assurance to passengers at peak times. In the case of Kew Bridge, train patronage on match days at Brentford Football Club has led to increased demand and warrants reconsideration as to whether retail capabilities could help support the many visitors to the area with varying needs on dedicated event days.

This consultation raises multiple questions and SWR must be clear in how they intend to mitigate the impacts of this proposal. The council therefore objects to the closure of ticket offices unless SWR can provide satisfactory responses to the queries set out below:

- The process undertaken to identify those who will be affected by this proposal, the process used to identify the mitigation measures proposed, and evidence that a robust appraisal of the impacts on people who may be affected has been undertaken. Why has an EQIA not been undertaken ahead of this consultation?
- How and where can people expect to find help at the stations where ticket offices are proposed to close?
- How will any changes be communicated to those that rely on additional assistance?
- What data has been used to identify that these stations no longer require ticket offices? For example, what proportion of tickets purchased are at stations in Hounslow compared to via smart media?
- Will existing ticket offices become redundant spaces within stations and what will happen to them?
- How will SWR deliver more face-to-face support for customers and greater visibility of staff while closing ticket offices and reducing staffing at some stations?
- What assistance will be provided for customers with disabilities who require support on and off train platforms? This can't be requested when purchasing tickets online, so what support and information will be offered to these customers?



- What mitigation measures are in place to aid with customers who would like to purchase season loan tickets etc, as these can't be purchased online?
- What are the proposed timescales for alterations to staffing and ticket offices?
- What data has been used to support the proposals for individual stations?

We look forward to receiving answers to these questions and working with SWR through our joint Community Rail Partnership which advocates for safe and equitable access to the rail network.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Jefferson Nwokeoma'.

Jefferson Nwokeoma
Assistant Director, Traffic, Transport & Parking