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Dear [REDACTED],

Making ATW Class 158s accessible

When Brian Freemantle and I met with you on 18 September, we outlined the Department's proposals for targeting the rail industry's efforts at those features of rail vehicles that have the greatest negative impact on the ability of disabled passengers to use particular vehicles. I have since written, explaining what would be expected on those vehicles owned by Angel that are currently subject to the Rail Vehicle Accessibility Regulations 1998.

At that same meeting, Angel and Arriva Trains Wales set out plans for a significant programme of works on those Class 158s owned by Angel and operated by ATW. You asked for the Department's advice on which additional areas of those pre-RVAR vehicles would need to be made more accessible in order for us to allow the use of the units beyond an End Date (likely to be 1 January 2020) by which time all rail vehicles in public service in Great Britain must be accessible to disabled people.

Angel provided a useful checklist, showing the vehicles' current compliance against the standards within both the RVAR and the Technical Specification for Interoperability - Persons with Reduced Mobility, which I was able to use when assessing a unit during my visit to Canton depot on 20 November.

Based on the Government's stated intention of an accessible rail fleet (by at least 1 January 2020) and our understanding of some of the engineering challenges on this fleet, we have amended the attached checklist to show:

- Any amendments to the main text in red, reflecting the Department's view on the compliance of the vehicle;
- The areas on the vehicles which are already compliant with either RVAR or the PRM TSI (labelled with yellow);
- The non-compliant areas on the unit which it would appear from your presentation in September are already being addressed within the planned programme of works (red and yellow hashing). This is not definitive, however, as I have not seen a breakdown of the planned work against each RVAR clause;

- Those non-compliant areas of the unit which are not expected to be corrected (unless a novel solution arises) as either:
 - they deliver only marginal improvements in accessibility eg. lowering one of three door control buttons by 115mm; or
 - compliance would involve significant re-engineering of the vehicle eg. closing the step riser is not possible without reworking the entire door mechanism; or
 - a marginal improvement in one area could adversely affect accessibility in another eg. requiring handrails in the doorways to achieve the compliant width would reduce the already narrow door throughway.

These areas are shown on the checklist in green.

- Finally, those areas (shown in red) where improvements to accessibility will need to be achieved in order for these vehicles to operate beyond the End Date.

Principally, there are four areas where further accessibility is expected, beyond the existing scope of works:

- The toilet currently provided for wheelchair users is not fit for purpose. We have already mentioned to you a possible solution to this issue on 158s, that is being developed by Delta Rail and which we and members of the Disabled Persons Transport Advisory Committee believe may be suitable (in theory, at least);
- The cramped dimensions of the existing wheelchair space, which means that, although the space faces fixed seating (which is desirable from an inclusion point of view), it is unlikely that anyone could use those seats if a wheelchair is present, as there is insufficient legroom. One solution is that applied by First Great Western to their 158s recently, where the pair of seats in the bay behind those facing the wheelchair space (including the one numbered 59 in the attached photo), are reversed. This allows the seats facing the wheelchair space to be moved backwards, creating more legroom. However, you may suggest another solution, which we would be happy to consider;
- The lack of a second wheelchair space on these units. During my visit to Canton, I suggested a solution which would see a second space being placed opposite the current space, where a luggage rack is now (also shown in the enclosed photo). The fixed seating could be rearranged to reflect whichever solution is agreed for the existing space (above). Naturally, you will wish to consider how to provide luggage space elsewhere. As we recognise that space is at a premium, we would be willing to consider the flexible use of this additional space (only) as storage for pushchairs and bikes – provided it is not needed by a wheelchair user. Appropriate signage would be needed to ensure that passengers know that wheelchair users have priority for that space. For clarity, we would not be prepared to consider similar flexibility for the existing space; and
- The narrow saloon end doorway which presents a considerable challenge to wheelchair users trying to access the wheelchair space(s) and could easily impact on dwell times. I was able to show during my visit that this doorway could be widened by up to 100mm, whilst still leaving at least 700mm of bulkhead on either side to provide support to wheelchairs.

I hope this is helpful to you, and would be happy to consider the solutions you propose. This position has been agreed with colleagues elsewhere in DfT Rail & National Networks, Transport Wales and DPTAC. They should not be used as a precedent on other vehicles, unless the surrounding conditions are exactly the same as this fleet. Equally, you understand that the Department's policy of targeted compliance relates only to existing vehicles, and provides no grounds for building new vehicles with similar non-compliances in the future.

I am copying this to Brian Freemantle and Peter Randall here, Tim James at Transport Wales and DPTAC. I shall also copy it to Porterbrook, HSBC and Transport Scotland, for their information when looking at other fleets of Class 158s.

Yours sincerely,

John Bengough
Accessibility Technical Standards Manager