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Our Ref: RGEN 39/23/2

26 September 2011

Dear Nick,

### **The accessibility of Class 313 vehicles by 2020**

We have engaged previously on outlining 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 certain vehicles, particularly with a view to their operation past 31 December 2019. I have since written, explaining what would be expected on those vehicles owned by Eversholt Rail that were previously subject to the Rail Vehicle Accessibility Regulations 1998.

With Andrew Burchell, I assessed First Capital Connect's unit 313 052 during my visit on 4 August 2011 to Hornsey depot, for compliance against the RVAR and the Technical Specification for Interoperability - Persons with Reduced Mobility.

As you are aware, the attached checklist shows the assessed current compliance of that Class 313 unit against the requirements within both standards. The checklist also sets out the Department's view on which areas of these pre-RVAR vehicles (introduced originally in 1976-77) would need to be made more accessible in order for us to allow the use of the units beyond the 1 January 2020 End Date. The Class 313s used by Southern have already received some of the access improvements – such as audio-visual PIS – that will be required on this fleet.

Based on the Government's stated intention of an accessible rail fleet by at least 1 January 2020 and, following discussions during the site visit, our understanding of some of the engineering challenges on this fleet, the attached checklist shows:

- The areas on the vehicles which are already compliant with either RVAR or the PRM TSI (labelled with green);
- In yellow, 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. making the existing door closure warning tone compliant with the PRM TSI; or
  - compliance would involve significant re-engineering of the vehicle.

- The non-compliant areas on the vehicle where we expect some work to be done to bring them closer to compliance, without necessarily achieving full compliance with either RVAR or the PRM TSI (labelled with yellow and red checks);
- Areas where the vehicles already partially comply but where further compliance is expected (shown as blue with red checks); and
- 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. Eg
  - installation of an audio-visual passenger information system.

As this checklist is also for the use of TOCs and bidders for future franchises, the checklist shows overall what is expected to be delivered on a unit in service. It will be helpful for stakeholders to liaise in future to ensure that updated versions of this checklist are created, in order to record progress made towards greater accessibility.

There are seven main areas where further accessibility is expected:

### Doorways

Although the external doorways have audible warnings when the doors close, no audible warning is given when the door becomes openable by passengers – this is needed and must be audible externally.

A contrasting strip had previously been provided on the edge of the step-board however this was worn and dirty. A more durable strip must be provided and kept clean.

### Door Controls

The metal buttons do not contrast against their metal base plate. Contrasting bezels should be fitted.

Both internal door controls are too high (although the “close” is only non-compliant by 80mm), fixed within a panel which would need to be extended in order to bring both buttons within a compliant height. Some improvement is expected. It was felt, however, that it would be acceptable to swap the position of the two controls (so that the “Open” would be only non-compliant by 80mm). This would involve significantly less work and expenditure than extending all the panels at every doorway.

The vehicle end manual door handles need to be replaced by ones which are palm-operable.

### Priority seats

No priority seats are provided on the unit. The correct number of compliant priority seats, with appropriate signage, will be necessary. The seats currently fitted would be acceptable as priority seats provided front clearances can be improved.

### Handrails

The vertical handrails in the doorways are too low. However, that one on the left hand side cannot be raised without conflicting with the door control panel. Therefore, this may remain. However, that one on the right hand side must be raised to a compliant height. The existing handrail may be reused even though it would not cover the full height range required.

### Passenger Information System

Although an audible PA system is installed on these units, no visual PIS is fitted (other than the compliant external roller blind system at the ends of the unit) and this will need to be installed.

### Wheelchair spaces

While the clearway to the current space was improved during the last refresh the space does not have a call-for-aid. This will need to be rectified, along with provision of a second, compliant space.

### Boarding Aid

This fleet uses station based ramps so these were not assessed during our visit. These will need to be compliant, including a fixing point on the vehicle.

I hope this is helpful to you, and would be happy to consider the solutions you propose. We would also welcome a breakdown of indicative costs and your views on the best time(s) to undertake the work.

This position has been agreed with colleagues elsewhere in DfT and DPTAC. It 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.

In due course, Eversholt will be able to ask the Department for a formal determination/dispensation under the Railways (Interoperability) Regulations (RIR) for those non-compliances which need not be rectified. This would then allow applicable fleets, if so desired, to operate past the 1 January 2020 date for rail vehicles to be accessible. The RIR are currently being updated and a revised version is expected to come into force in December 2011.

I am copying this to Brian Freemantle and Peter Randall here, and DPTAC. I am also copying to the Office of Rail Regulation, as the body responsible for enforcing the End Date on heavy rail.

Yours sincerely,

**John Bengough**

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