

29 May 2013

Dear [REDACTED],

The accessibility of Class 442 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.

With you, I assessed unit 442 414 during my visit on 20 September 2011 to Stewarts Lane 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 442 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 1988) 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.

It is worth noting that this fleet received a significant upgrade in accessibility in 2008-09 when they moved to Gatwick Express. That work included making the existing wheelchair space compliant, providing a second compliant space, fitting a Passenger Information System, priority seating and a securable ramp that is specially adapted to the geometry of the doorway.

The external doors on this fleet have only a narrow throughway. Ideally this would be increased but it is recognised that this would involve modifications to the structure of the vehicle and is likely to have a high cost. I tested with the reference wheelchair and found that it is possible – but certainly not easy – to board. Therefore, although the Department does not require the doors to be widened we would certainly encourage Angel to consider whether something similar to the new powered door solution fitted to Chiltern's Mk3s would be appropriate here.

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, 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.

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. This letter and checklist will be placed on the Department's web page setting out its targeted compliance expectations for heavy rail. 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 four main areas where further accessibility is expected:

Doorways

Although the external doorways have audible warnings on the interior when the doors close, no audible alert is given when the door becomes openable by passengers. Both warnings must also be audible externally.

Door Controls

There is a mix of compliant and non-compliant door controls throughout the unit. Those that are not compliant in operating force, illumination, contrast and tactile identification will need to be replaced

Both internal controls for the external doors are too high (although the "Close" is only non-compliant by 40mm), 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 40mm). This would involve significantly less work and expenditure than extending all the panels at every doorway. In this case the Department would grant a dispensation from the requirement in the PRM TSI for the Open control to be above the Close.

Handrails

Some vertical handrails in the doorways do not contrast.

Accessible toilet

The current module is not fit for purpose, as it cannot be used by someone in the reference wheelchair. It will need to be replaced – this is likely to impinge on the passenger saloon and require some remodelling there.

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, the Department will provide a formal dispensation under Regulation 45(d)(iv) of the Railways (Interoperability) Regulations 2011 for those non-compliances which we have indicated need not be rectified. This, plus work to correct the areas that must be addressed, would then allow applicable fleets, if so desired, to operate past the 1 January 2020 date for rail vehicles to be accessible.

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
Rolling Stock Technical & Accessibility