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Our Ref: RGEN 39/23/2

22 December 2010

Dear Nick,

### **The accessibility of Class 315 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.

I assessed a Class 315 unit during our visit to Ilford depot, on 6 May 2010 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 315 unit against the requirements of both standards. The checklist also sets out the Department's view on which areas of these pre-RVAR vehicles (introduced originally in 1980) 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.

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; or
  - compliance would involve significant re-engineering of the vehicle.
- Areas where the vehicles already partially comply but where further compliance is expected (shown as blue with red checks): eg. some additional signage for priority seats is required.
- 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
  - Provision of a compliant boarding ramp; and

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 five principal areas where further accessibility is expected.

#### Priority seats

Sufficient numbers of seats are marked as giving priority, and these meet the required dimensions in most regards. However, none of those currently labelled provide sufficient front clearance, all of them being at least 65mm too small. Improvements will be expected.

#### Vehicle end door handles

The door handles fitted to the end of the vehicles are of an old design that requires significant finger dexterity. These will need to be replaced.

#### 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

There are currently no facilities for wheelchair users. Two wheelchair spaces is the minimum requirement, although we have accepted the mixed use of the second space on the similar Class 455 fleet. A significant number of other sub-requirements, e.g. signage, call-for-aid, etc, cascade from the overall requirement to provide wheelchair spaces, and compliance will be expected.

#### Boarding Aid

A compliant boarding ramp will also need to be provided.

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 National Networks 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 Rail 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 November 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**  
Head of Domestic Policy