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26 September 2011

Dear Nick,

The accessibility of Mark 4 coaches 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 Paul Sutherland, I assessed a rake of Mk 4 coaches during my visit on 4 August 2011 to Bounds Green 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 Mk 4 rake 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 1989-92 and thoroughly refurbished with significant DPTAC input, in 2003-05) 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: eg. making the existing door closure warning tone compliant with the PRM TSI; or
 - compliance would involve significant re-engineering of the vehicle: eg. deepening the steps at the external doorways.

- 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 only four 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.

Handrails

The only handrails near the external doorways are horizontal and probably provide support to passengers standing in the vestibule. They are unlikely to provide support to someone boarding or alighting. Vertical handrails must be provided closer to the door aperture.

Passenger Information System

Although an audible PA system is installed on these units, no visual PIS is fitted and this will need to be installed.

Toilets

The flush controls in the toilets need attention as they require some 45-66 Newtons to operate, which significantly exceeds the 20 Newtons permitted under the PRM TSI

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, Geoff Appleby 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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