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Dear Ian,

### **The accessibility of Class 456s by 2020**

You have engaged previously with John Bengough, the Department's Accessibility Technical Standards Manager, on outlining DfT'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, particularly with a view to their operation past 31 December 2019. John has since written, explaining what would be expected on those vehicles owned by Porterbrook that are currently subject to the Rail Vehicle Accessibility Regulations 1998 (RVAR).

At your request, I assessed two Class 456 units at London Victoria station, and in service between there and London Bridge station, for compliance against the RVAR and the Technical Specification for Interoperability - Persons with Reduced Mobility (PRM TSI). Naturally, assessing a unit in service means that some measurements were difficult to obtain – so you may wish to confirm these yourself once you have had time to read the checklist. Using this as a basis, I have set out in the attached checklist the Department's view on which areas of these pre-RVAR vehicles 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 by which time all rail vehicles in public service in Great Britain must be accessible to disabled people.

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. lowering the door open control button by 170mm;
  - we recognise that these are small units with large vestibules;
- Areas where the vehicles already partially comply but where further compliance is expected (shown as blue with red checks): eg. audible warnings are given when the doors close but not when they become openable by passengers; audible public information systems are fitted but not visual ones;

- 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 (including a Call-for-Aid in the wheelchair space).

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.

There are six principal areas where further accessibility is expected.

### Doorways

Although the external doorways have audible warnings when the doors close, there is no audible warning when the door becomes openable by passengers – this is needed.

A light source and a contrasting band across the doorway are needed to highlight the threshold into the vehicle.

### Door controls

The existing door controls should be replaced with ones that are identifiable by touch.

### Priority seats

Some allowance for priority seating needs to be made. Although some existing seating positions on the assessed units are already labelled as priority seats, they do not meet the required dimensions.

### Handrails and handholds

The handrails at the external doorways are too low and are of insufficient diameter. Consideration should be given to how the height range could be improved (though possibly not to a fully compliant height) without obstructing the door controls.

Although seat back handholds are fitted, they are too narrow and will need to be replaced.

### Passenger Information System

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

### Wheelchair spaces

After careful consideration we have decided that a second wheelchair space will not be necessary on this fleet. We have balanced potential inconvenience to a second wheelchair user with the fact that these units frequently operate in multiple and that they have large vestibules, where, if necessary, a second wheelchair user could sit if necessary. This is not ideal so a second space remains desirable – but not essential. You should also note that the existing wheelchair space requires installation of a call-for-aid and appropriate signage both inside and outside 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 Rail & 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, Porterbrook will be able to ask the Department for a formal determination under regulation 5(8) of the Railways (Interoperability) Regulations 2006 (RIR) of which non-compliances need not be rectified (our response would mirror the compliance checklist attached to this letter). This would then allow this fleet, if so desired, to operate past the 1 January 2020 date for rail vehicles to be accessible, by virtue of new RIR regulation 4B(d)(iii). This last was inserted by the Rail Vehicle Accessibility (Interoperable Rail System) Regulations 2008.

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,

**Nathan Cole**