



John Bengough  
Rail Safety (Advice) & Rail Vehicle  
Accessibility Manager  
Rail Standards & Safety  
Department for Transport  
4/34 Great Minster House  
76 Marsham Street  
London  
SW1P 4DR

Direct Line: 020 7944 5035  
Mobile: 07850 205 327  
E-mail: john.bengough@dft.gsi.gov.uk

Web Site: [www.dft.gov.uk](http://www.dft.gov.uk)

Our Ref: RGEN 39/23/2

1 October 2008

Dear [REDACTED],

### **The accessibility of Class 465-2 and 466 vehicles by 2020**

I have engaged previously with your colleagues at Angel 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 wrote to Steve Allen a year ago, explaining what would be expected on those vehicles owned by Angel Trains that were previously subject to the Rail Vehicle Accessibility Regulations 1998.

Steve Allen provided a checklist showing the current compliance of Class 465-2 and 466 vehicles against the standards within both the RVAR and the Technical Specification for Interoperability - Persons with Reduced Mobility. Using this as a basis, along with my observations of an HSBC Class 465 unit during a visit to Slade Green depot on 3 July, 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 35mm; or
  - compliance would involve significant re-engineering of the vehicle: eg. closing the step riser is not possible without reworking the entire door mechanism; or
  - a marginal improvement in one area could adversely affect accessibility in another: eg. making the handrails in the doorways round would reduce the door throughway on these busy commuter units.

- 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): eg. allowing existing seats that are 10mm too narrow to be used as priority seats, provided that clearances, height, etc are made compliant;
- Areas where the vehicles already partially comply but where further compliance is expected (shown as blue with red checks): eg. the force required to operate the "door open" controls inside the vehicle is acceptable, but is excessive on the controls outside the vehicle;
- 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.

You will note that there are areas that were considered to be outside Angel's remit in the original checklist provided by Steve – such as specifications and use of the station based boarding ramp. As this checklist is also for the use of TOCs and bidders for future franchises, the checklist has been amended to show overall what is expected to be delivered on a unit in service.

Principally, there are seven areas where further accessibility is expected, beyond the existing scope of works:

#### Door controls

The external and inter-vehicle 'door open' controls require excessive force to operate which will need to be reduced.

#### Doorways

Although the external doorways have audible warning features, the 'door enabled' indicator does not sound for long enough.

A light source and a contrasting band across the doorway are needed to highlight the step into the vehicle. On the HSBC unit we assessed, the existing painted band version had worn badly and a permanent solution will be required for the whole fleet. There is also no contrast in the floor colour between the vestibule and the saloon.

#### Priority seats

Some existing seating positions on the HSBC unit we assessed are already labelled as priority seats but do not provide compliant clearances. Thought will need to be given to ensure that sufficient numbers of compliant (other than seat width – see above) priority seats are provided

#### Handrails and handholds

The handrails at the external doorways are too short and need to be extended. Some seat backs have neither handholds nor handrails fitted, while not of all those currently fitted contrast with the seats.

#### Passenger Information System

While the appearance of the current system is deemed to be acceptable visually, equivalent audio announcements will be needed. The information displayed will also needed to be altered, so that it provides next station and destination, rather than an unchanging scroll through all the stations on a route, without regard to position.

### Toilet

The toilet will need to be made wheelchair accessible if it is retained. You will wish to be aware that DeltaRail is developing a possible solution for the particularly tight size restraints on Class 158s, which may also be of use on Class 465s. Based on a recent assessment of their concept mock-up, we and members of the Disabled Persons Transport Advisory Committee believe that DeltaRail's solution provides the accessibility required by RVAR and the PRM TSI.

### Wheelchair spaces

Two wheelchair spaces are required, with the appropriate signage and call-for-aids.

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, Angel Trains 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,

**John Bengough**  
**Rail Safety (Advice) & Rail Vehicle Accessibility Manager**