



John Bengough
Rolling Stock Technical & Accessibility
Rail Sustainability - Operations
Department for Transport
3/14 Great Minster House
33 Horseferry Road
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

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13 August 2012

Dear [REDACTED],

The accessibility of Class 313/2 vehicles by 2020

I have outlined previously 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.

Using as a basis the compliance checklist previously agreed with Eversholt Rail for their Class 313s in use with First Capital Connect, you assessed Beacon Rail's 313/2 fleet (in use with Southern) for compliance against the RVAR and the Technical Specification for Interoperability - Persons with Reduced Mobility. As expected, Beacon Rail's fleet has more areas of compliance as it was more recently (and thoroughly) refurbished.

I have reviewed your submission and set out the Department's view on which areas of these pre-RVAR vehicles (introduced in 1976-77) 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 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 when the doors close, no audible warning is given when the door becomes openable by passengers – this is needed and must be audible externally.

Door Controls

The metal buttons do not contrast against their metal base plate. Contrasting bezels could be fitted.

Both internal controls for the external doors are too high (although the "Close" is only non-compliant by 80mm), 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 80mm). 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.

The vehicle end manual door handles need to be replaced by ones which are palm-operable and meet the maximum force requirements.

Handrails

The vertical handrails in the doorways are too low. However, that one on the left hand side cannot be raised without conflicting with the door control panel. Therefore, this may remain. However, that one on the right hand side must be raised to a compliant height. In order to reduce expenditure, the existing handrail may be reused even though it would not cover the full height range required (a dispensation would be granted for this).

Boarding Aid

You were unable to check whether the boarding ramp has fixing pins, with an interfacing hole/slot on the vehicle. These must be provided.

With DfT and ORR's agreement, Eversholt, Angel and Porterbrook have been working together on a common specification for ramp fixing pins/holes – in order to improve consistency between those older fleets which will need these to be retrofitted before 2020 (and so enable a single ramp design to be used across many fleets). I would strongly encourage Beacon Rail to seek consistency too – although in your case you may wish to

achieve consistency with Southern Electrostar arrangements (depending on your medium and long term plans for this fleet).

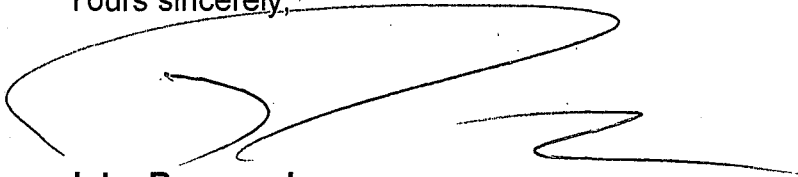
I hope this is helpful to you, and would be happy to consider the solutions you propose. We would also welcome a breakdown of indicative costs and your views on the best time(s) to undertake the work.

This position is consistent with the position agreed with colleagues elsewhere in DfT and DPTAC on Eversholt's Class 313s. 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 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,

A large, stylized handwritten signature in black ink, appearing to be 'John Bengough', written over a horizontal line.

John Bengough
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