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Our Ref: RGEN 39/23/2

18 January 2010

Dear Ian,

### **The accessibility of Class 143 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 Porterbrook that were previously subject to the Rail Vehicle Accessibility Regulations 1998.

I assessed a Class 143 unit during my visit on 22 December to Cardiff Canton depot, with Dermot Carroll from the DfT Rail Systems Division, 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 Arriva Trains Wales' 143 624 unit against the standards within both the RVAR and the Technical Specification for Interoperability - Persons with Reduced Mobility, and sets out the Department's view on which areas of these pre-RVAR vehicles (introduced in approximately 1985) 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. lowering the door open control button by 30mm; 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): eg. allowing the

marginally non-compliant handrails beside the draught screens to remain provided those in the doorways are replaced by larger ones with greater clearance.

- Areas where the vehicles already partially comply but where further compliance is expected (shown as blue with red checks): eg. a contrasting strip already exists on the floor edge but a second one is necessary on the edge of the step.
- 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 a visual passenger information system (including a call-for-aid in the wheelchair space); and
  - fitment of an accessible toilet if a toilet is to be retained.

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 eight principal 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.

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

Whilst currently accepted as a non-compliance it would be useful to know any future upgrade plans for the fitting of door sensors.

### Floors

Contrast will need to be provided between the saloon and vestibule areas.

### Priority seats

Although sufficient seating positions on the assessed unit meet the requirements for priority seats, they are not labelled as such. Appropriate signage needs to be provided. In reality, it is likely that the unit's layout will change so this will need to provide adequate numbers of priority seats too.

### Handrails

The handrails on the door panels are too narrow and have insufficient clearance. Thicker handrails with greater clearance can be provided without significantly impacting on the throughway.

### 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.

### Accessible toilet

If toilet facilities are to be retained on these units, these will need to be wheelchair accessible. We discussed that it would be desirable to keep the toilet in the middle of the unit, close to the inter-vehicle connection, for weight distribution reasons.

### Wheelchair spaces

While these units currently benefit from four large areas (two at the cab end of each vehicle) that could accommodate wheelchairs, these are non-compliant in a number of ways (eg. no internal signage, inadequately sized support structure, no call-for-aid).

In reality, your thoughts had already focussed on creating two compliant spaces near the centre of the vehicle, with access to the proposed accessible toilet via a widened inter-vehicle connection (which can be enlarged on this type of vehicle far more easily than on most).

### 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, Transport Wales 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, Transport Wales 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 Standards

