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Our Ref: RGEN 39/23/2

3 December 2010

Dear Ian,

### **The accessibility of Class 455 vehicles in use with South West Trains 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 several Class 455 units in service on 27 October 2010, for compliance against RVAR 2010 and the Technical Specification for Interoperability - Persons with Reduced Mobility. As you are aware, the attached checklist shows the assessed current compliance of those 455 units against the standards within both standards. The checklist also sets out the Department's view on which areas of these pre-RVAR vehicles (introduced originally in 1982-82 and thoroughly refurbished in 2004) 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 warning tone compliant with the PRM TSI; or
  - compliance would involve significant re-engineering of the vehicle.
- 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;

- 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 call-for-aid in the wheelchair spaces; and
  - ensuring a compliant manual boarding ramp is used for these units.

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.

The accessibility of this fleet was significantly improved during the refurbishment a few years ago however there are a small number of 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.

A contrasting band across the edge of the step-board is needed to highlight the threshold into the vehicle. Contrast is provided across the whole step-board which is excessive. This must also be kept clean.

### Vehicle end door handles

These are a small design, which require finger dexterity to operate. Lever type handles will be needed.

### Call-for-aid

A call-for-aid will need to be fitted into each of the wheelchair spaces, with compliant functionality and signage.

### 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 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 – which will shortly be updated) 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**  
Head of Domestic Policy  
Rail Standards & Safety