



Department  
for Transport

# Rail Vehicle Accessibility: Exemption application

Postal Museum (London)  
'Mail Rail' Ride

**Moving Britain Ahead**

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# Foreword

The Rail Vehicle Accessibility (Non-Interoperable Rail System) Regulations 2010 (RVAR) set standards for the accessibility features of a rail vehicle operated on particular types of rail systems. The Secretary of State has powers under section 183 of the Equality Act 2010 to allow operators of regulated rail vehicles to continue to operate a vehicle if it does not fully comply with the standards set in the Schedules to these RVAR 2010.

This consultation contains the application from the Postal Museum (London) Mail Rail Ride for exemption from the standards set out in the Schedule to RVAR 2010 for minimum levels of accessibility. The applicant is seeking inclusion to the list of networks in the Schedule to the Rail Vehicle Accessibility Regulations (Network) Exemption Order 2010<sup>1</sup>. This Order permits the use of rail vehicles which do not conform to the provisions of the standards of RVAR 2010, when operated on a miscellaneous network

The consultation period shall run until 3 December 2018. To share your views and comments on the application please contact us at: [railvehicleaccess@dft.gsi.gov.uk](mailto:railvehicleaccess@dft.gsi.gov.uk) or

Postal Museum (London) Mail Rail Ride RVAR consultation  
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<sup>1</sup> [http://www.legislation.gov.uk/ukxi/2010/904/pdfs/uksi\\_20100904\\_en.pdf](http://www.legislation.gov.uk/ukxi/2010/904/pdfs/uksi_20100904_en.pdf)

# 1. Exemption application

## 1 Full name of applicant and address

The Postal Museum  
15-20 Phoenix Place  
London  
WC1X 0DA

## 2 Description of Rail Vehicles to which the application relates, including the i)class number; (ii)unit number; (iii)vehicle number; (iv)name of the manufacturer; (v)place of manufacture; and (vi)date the vehicle first brought into use

Two number 2017 built narrow gauge battery electric trains built for the specific purpose of operating within the existing 1915 built tunnel network of the former Post Office Railway. Train units designed and built by Severn Lamb in Warwickshire during 2016 and 2017 and brought into use carrying visitors for the first time on 3rd September 2017. Each train consists of two motor units and three carriages, the central carriage also carries the battery and so has reduced seating, the other two carriages are exclusively for visitor seating. The two trains are identified by colour, one is green the other red. They do not carry any other identifying number or name.

## 3 A general description of the services which the rail vehicle is likely to be used to provide and the routes on which it is likely to be operated

The train ride is operated as part of a visitor ride experience within The Postal Museum. The ride is operated under the Fairgrounds and Amusement Parks guidance HSG 175 with the enforcing authority of the HSE, inspected under the Amusement Device Inspection Procedures Scheme (ADIPS). The ride begins and ends in the same place and travels over a 1km (0.62 mile) loop for a 15 minute ride under the Mount Pleasant Mail Centre. The ride starts and ends in the former Post Office Railway workshop which is now the main Mail Rail gallery operated by The Postal Museum. There are seats for 30 people on the train but due to the small size of the train it is never possible to fill each seat. Tickets are sold on the basis of 22 people per train and trains rarely carry more than 25 people.

## 4 The provision of RVAR from which exemption is sought

All provisions under the Rail Vehicle Accessibility Regulations 2010 and to be added to the list of Exemption Orders 2010

## 5 Technical, economic and operational reasons why exemption is sought

The train ride operated by The Postal Museum is one built within the existing Post Office underground Railway tunnel network. The railway was designed in 1912 and

constructed from 1914 until 1927 (construction was delayed by the First World War).

The railway was designed to carry items of mail not people and used small scale trains measuring 1.45m high and operated in tunnels with a diameter ranging from 30 feet (9.14m) to as small as 7 foot (2.13m). The trains run on a 2-foot (0.61m) gauge track and were automatic with no driver and took power from a central third rail operating at 440v DC.

As such when The Postal Museum decided to explore operating a section of the track, which had been moth-balled in 2003 it had to do so within these constraints. The trains designed to carry people whilst driver operated had to perform within the existing tunnel network and could not be larger than the original trains.

Every option to enlarge the train was carried out, including lowering the train closer to the rail and extending the height and width as much as possible but this still does not provide enough space to accommodate even the smallest wheelchair. The option to widen the tunnels was not economically feasible. To undertake this would have been a major engineering project involving above ground as well as below ground works. A tunnel boring machine would have been required and this would have added millions of pounds to the budget and may well have impacted the buildings above. TPM is also not the owners of the tunnels.

The tunnels are below the water table and any modification to the tunnel walls would have involved extensive specialist tunnel engineering. This would have made the project completely unviable. The project was a £25million capital investment without modifying tunnels, the gauge of track could only be widened buy re-building the tunnels and this would have cost hundreds of millions of pounds and may well have impacted on the buildings above and the London Underground tunnels that run close by. Modifying the tunnels and making them larger would also have changed entirely the nature of the space and taken away the unique aspect of Mail Rail as a narrow-gauge railway.

Additionally, because the ride is operating within a tunnel network over tracks in the event of emergency visitors need to disembark the train and walk unaided from the train over a distance of at least 100m. This may well be from a place other than the embarkation points and may also require ascending steps. It was a stipulation of the London Fire Brigade that all visitors must be able to evacuate themselves from the ride in an emergency. The ride restriction therefore applies to visitors with mobility issues and not all disabilities.

## **6 Supplementary information for consideration**

BPMA Design - Approval of the Engineered Concept.

## **7 The effect which non-compliance would have on a disabled person's ability to use the rail vehicle.**

As it is not possible to accommodate some people with mobility issues onto the train it means these visitors will not be able to go on the ride. However, the rest of The Postal Museum gallery and Mail Rail Car Depot is available and fully accessibly. There is also an alternative AV show provided of the route and show experienced within the train, so this content is not missed by those unable to get on the train. The physical experience of travelling through the tunnel will be the element missed. The Mail Rail ride is charged for separately so tickets that do not include this element are available. Disabled guests are also able to bring a companion as part of their ticket price.

**8 The measures proposed, if the application is granted, to enable a disabled person to use the rail vehicle.**

The restriction to the ride is only for visitors with certain mobility issues. It does not apply to all visitors with disabilities and many people will be able to fully experience the ride. The restriction as identified above applies to people who will not be able to walk unaided for at least 100m in the event of needing to evacuate the train. This means those dependant on a wheelchair for example are unable to board the train. Those using walking sticks or those who use a wheelchair but can walk at least 100m without it are fully able to join the ride.

For those who cannot board the train then alternative offers are available via the AV show at the end of the train ride area. This allows visitors to see the AV show that is experienced on the train. Whilst this means the experience of the train is missed the contents of the show, story and narrative are all still available. All other aspects of the exhibition are also still available to all visitors.

**9 The period for which the exemption order is requested to be in force**

Indefinite period

**10 Unless permanent exemption sought, the period during which exemption is to apply.**

N/A