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29 November 2010

Dear [redacted],

The accessibility of Class 156 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 unit 156 417 during our visit on 19 October 2010 to Wolverton works, 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 that 156 unit 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 1988-89) 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: eg. widening the external doorways.
- 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);
- 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 an audio-visual passenger information system (including a call-for-aid in the wheelchair spaces); and
 - fitment of an accessible toilet.

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

The external doorway is smaller than mandated but could be accessed by a reference wheelchair.

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 cleaned more regularly.

Floors

If the internal doors are retained, contrast is not required between the vestibule and saloon.

Priority seats

No priority seats are provided on the unit. The correct number of compliant priority seats, with appropriate signage, will be necessary. The Chapman seats currently fitted would be acceptable as priority seats but the front clearances must be improved.

Handrails

The handrails in the external doorways must be improved. Those vertical handrails on the opposite side from the door controls must be raised to a more compliant height, while vertical handrails must be provided where currently there are only horizontal ones – as these are not helpful when boarding/alighting.

Although the handrails in the doorways are only 25mm in diameter, and therefore non-compliant, to require the fitment of wider handrails would impact on the already narrow throughway for all passengers.

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

A compliant wheelchair accessible toilet will be needed on this fleet. The current toilet makes some provision for wheelchair users but this is inadequate.

Porterbrook intend to use to unit to trial the fitment of the accessible "Tardis toilet" originally developed by DeltaRail for fitment into the constrained footprint of Class 158s.

Wheelchair spaces

The single wheelchair space currently provided is very poor. Two complaint wheelchair spaces must be provided – one of which could also be used for luggage/bikes, provided signage indicates that wheelchair users always have priority.

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