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Deputy Director
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5th November 2021

Dear [redacted]

THE RAILWAYS (INTEROPERABILITY) REGULATIONS 2011: NON-COMPLIANCE WITH PLATFORM DOOR WIDTH AND HEIGHT REQUIREMENTS IN THE SRT NTSN

Thank you for your letter of 5th October 2021 to my colleague, [redacted], applying for a decision under Regulation 14 (2) (f) of the Railways (Interoperability) Regulations 2011 (RIR 2011), to enable a non-compliance with the Safety in Railway Tunnels (SRT) NTSN for the width and height of the evacuation doors on the new station platforms as set out in section 4.2.1.5.2(c) of the NTSN. Regulation 14(2) (f) sets out that an exemption can be granted for cases where a project employs innovative solutions which either do not comply with the relevant NTSNs or to which the assessment methods in the specified NTSNs cannot be applied.

I understand this request applies to all subsurface train stations on the Elizabeth line as set out in your application letter. These are as follows:

1. Paddington
2. Bond Street
3. Tottenham Court Road
4. Farringdon
5. Liverpool Street
6. Whitechapel
7. Canary Wharf
8. Woolwich

This application supplements previous exemptions granted to the Crossrail project in my previous letters which covers the following sections;

- 4.2.1.2 (a)
- 4.2.1.2 (b)
- 4.2.1.2.5 (a)
- 4.2.1.2.5 (b)

I note that your application has set out the areas of non-compliance that will be applied at the above-mentioned stations. These are as follows;

Name of station	Details of non-compliance at station
PAD – Paddington	Door height – 1970mm
WHI – Whitechapel	Door height – 1970mm
TCR – Tottenham Court Road	Door width – 870mm Door height – 1970mm
LIV – Liverpool Street Station	Door width – 1050mm Door height – 1970mm
BOS – Bond Street	Door width – 1066mm Door height – 1970mm
FAR – Farrington	Door width – 1069mm Door height – 1970mm
CWG – Canary Wharf Group	Door width – 1100mm Door height – 1970mm
WOO – Woolwich	Door width – 1010mm Door height – 1970mm

I note that the main reason for the non-compliances is due to the perpendicular placement of the doors (the door is 90 degrees to the walkway rather than parallel) and that your proposed solution is aligned with the RSSB guidance document GIGN7619 (Issue 2), which allows for the width of the door to be less than the 1.4m, where the common safety Method (CSM) risk assessment deems it acceptable.

I understand that the justification for these non-compliances in this case is that given the dimension of the Crossrail tunnels, there is insufficient physical space on the platform width for doors of a minimum width of 1.4 meters and height of 2 meters as set out in section 4.2.1.5.2(c) of the SRT NTSN. You have supplied information concerning a risk assessment and modelling carried out for the evacuation of platforms with these narrower and shorter doors, which confirms that by enabling these non-compliances it is expected there will be no adverse impact on the safe evacuation of passengers from the tunnel into the safe area of the platform.

With regards to Tottenham Court road, which is the worst case of non-compliance with a minimum door width of 870mm and door height of 1970mm, your risk assessment shows that the impact on evacuation time is seen to be between none to <2%.

ORR have not raised any objections and I have considered your application for an exemption from this requirement in the SRT NTSN. On behalf of the Secretary of State, I am granting your request.

I am copying this letter to [redacted] at the ORR.

Yours sincerely,

[redacted]

[redacted]
Deputy Director Rail Industry Standards and Capability