



Department for Transport

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Dear [redacted],

30 August 2022

THE RAILWAYS (INTEROPERABILITY) REGULATIONS 2011: NON-COMPLIANCE AT INVERNESS AIRPORT STATION FOR THE DANGER AREA REQUIREMENTS IN THE PRM NTSN

Thank you for your letter of 25 May 2022, requesting an exemption under Regulation 14(2) (f) of the Railways (Interoperability) Regulations 2011 (RIR 2011) for the danger area marking at Inverness Airport station, to enable non-compliance with clause 4.2.1.12(6) of the Persons with Reduced Mobility NTSN (PRM NTSN). Accompanying your letter was a full application form and risk assessment, as required under Regulation 14A of RIR 2011.

Your request is an exemption for non-compliance with Standard 4.2.1.12(6) of the Persons with Reduced Mobility (PRM) NTSN, which states: "The boundary of the danger area, furthest from the rail side edge of the platform, shall have a visual marking and tactile walking surface indicators".

As your application explains, this standard implies that the visual marking and tactile walking surface should be co-located to mark the boundary of the danger area. Your application highlights that tactile surfaces are used in Great Britain to mark the edge of the platform and to help visually impaired people orient themselves for boarding the train, and that this surface must be at a consistent distance (760mm) from the platform edge across the network to achieve this primary purpose of orientation.

However, the station risk assessment shows the aerodynamic risk at Inverness Airport Station created by passing freight trains, which makes the danger area on its platforms larger than typical stations on the network, meaning the visual marking and tactile walking surface indicators required in the NTSN would need to be located further from the platform edge to mitigate against this aerodynamic risk. From your assessment, complying with the provision in the NTSN would create risks at Inverness Airport Station as the project would have to carry out the following works:

- Moving the tactile surface to where the danger area ends, meaning it would be further away from the edge of the platform compared to other stations on the network; and/or
- Installing two tactile surfaces, one to mark the edge of the platform, and a second to mark the edge of the danger area, which is different from other stations on the network where only one tactile is typically used.

Your application states that implementing one or both of these solutions could pose a safety risk to visually impaired passengers, as it would make the tactile provisions at Inverness Airport Station different from other stations on the rail network, which could confuse users. Your application proposes instead to apply the Railway Industry Standard (RIS) 7016-INS Issue 1.2, Part 9.4, which allows:

1. A visual marking to mark the edge of the danger area (1500mm away from the edge of the platform based on your station risk assessment);
2. A tactile surface to mark the edge of the platform to aid the visually impaired in boarding the trains (760mm away from the edge of the platform, as per current industry practice); and
3. Other mitigations, like audio announcements at the station, to be employed to reduce the risk to passengers in not marking the edge of the danger area through a tactile surface.

Your letter explained that this RIS-7016-INS is based on the RSSB research paper T1118 (“Optimising the design and position of platform markings designed to keep people away from the platform edge”). This research paper demonstrated that the tactile paving to mark the edge of the platform should remain in a consistent place across the network, and that other mitigating measures should be employed to ensure passengers stand at a safe place on the platform. You provided evidence that the operator has agreed to the mitigations set out in your letter.

Regulation 14 (2) (f) states 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. You have sought a decision that you are exempt from standard 4.2.1.12(6) of the PRM NTSN, on the basis that employing RIS-7016-INS at Inverness Airport Station represents an “innovative solution” which better reduces the risk to passengers than applying the NTSN in full.

DfT has considered your proposal in consultation with the ORR. We have determined that the proposed solution to keep the tactile provisions at Inverness Airport Station consistent with the rest of the network, along with the mitigating additional solutions to be employed, represents an “innovative solution” in place of applying 4.2.1.12(6) of the PRM NTSN. We are also satisfied that this “innovative solution” helps to make visually impaired passengers safer when navigating the station environment. On that basis, it is the Competent Authority’s decision that the requested exemption is granted. This exemption does not exempt you or the station operator from the responsibility to manage safety risks to the level required by law, and your Regulation 14 proposal has not been evaluated against this legal standard.

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

Yours sincerely,

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Deputy Director Rail Industry Standards and Capability