Department for Transport

Annual Report Rail Vehicle Accessibility Regulations Exemption Orders

1 January 2025 – 31 December 2025

October 2026

Department for Transport

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1 January 2025 – 31 December 2025

Presented to Parliament pursuant to section 185 of the Equality Act 2010

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1 Introduction

1.1 This report has been laid before both Houses of Parliament by the Secretary of State for Transport in fulfilment of obligations under section 185 of the Equality Act 2010 ("EA 2010").

1.2 The report contains information about the exercise of the Secretary of State's power in the reporting year to grant Exemption Orders under section 183(1) of the EA 2010 to exempt rail vehicles from the requirements of the Rail Vehicle Accessibility (Non-Interoperable Rail System) Regulations 2010[1] ("RVAR 2010") It contains details of each order made and details of consultation carried out in connection with orders made.

1.3 The practice of previous Annual Reports is followed, in that details are included not only of the Exemption Orders made for 'light rail' vehicles from the requirements of the RVAR 2010 but also the dispensations granted under the Railways (Interoperability) Regulations 2011[2] ("RIR 2011") for main line ('heavy rail') vehicles from the requirements of the Persons with Reduced Mobility National Technical Specification Notice[3] ("PRM NTSN") and included within this report, the Accessibility National Technical Specification Notice[4] ("ACC NTSN"). The applicability of the RVAR 2010, the PRM NTSN and the ACC NTSN is explained in Section 3 below.

1.4 The report covers the period 1 January 2025 to 31 December 2025 and has been published on the Department for Transport's website at https://www.gov.uk/government/collections/rail-vehicle-accessibility-regulations-rvar-exemption-orders

2 Summary and statistics

2.1 This section outlines the headline figures for 2025, including the number of Exemption Orders brought into force, applications received and the number of exemptions which expired during the year.

- Applications carried forward from 2024: 6 (see Section 5)
- Applications received: 3 (see Section 5)
- Applications withdrawn: 0
- Applications rejected by Ministers: 0
- Applications accepted by Ministers: 5 (see Section 5)

[1] S.I. 2010/432
[2] S.I. 2011/3066
[3] PRM_NTSN
[4] ACC_NTSN

- Orders brought into force: 5 (see Section 5)
- Applications carried forward into 2026: 7 (see Section 5)
- Exemption Orders expiring: 3 (see Section 6)

3 Background

3.1 Section 182 of the EA 2010 empowers the Secretary of State to make rail vehicle accessibility regulations ("RVAR") to enable disabled people, including wheelchair users, to travel in safety and reasonable comfort in those vehicles to which the regulations apply. The original regulations were made in 1998 (under the Disability Discrimination Act 1995 (“DDA”)) and were amended in 2000 and 2008 before the RVAR was made in its current form in 2010.

3.2 In 2008, a European Technical Specification for Interoperability for Persons with Reduced Mobility (“PRM TSI”) came into effect. The PRM TSI contained requirements that were similar to the RVAR but applied only to main line, ‘heavy rail’, vehicles. In order to avoid having dual regulation of those vehicles under both domestic and European requirements, the scope of the RVAR was reduced to make them applicable only to light rail vehicles, including metro, underground and tramway networks, and prescribed guided transport systems. These are the RVAR 2010.

3.3 Furthermore, the EA 2010 required that regulations made by the Secretary of State under section 182 of the Act must ensure that all passenger rail vehicles would meet accessibility standards by no later than 1 January 2020 (“the 2020 end date”). The RVAR 2010 includes provisions to meet this requirement. The RIR 2011 included the 2020 end date for application to heavy rail vehicles subject to the PRM TSI. The PRM TSI ceased to apply on 1 January 2021 and was replaced by the Persons with Reduced Mobility National Technical Specification Notice ("PRM NTSN").

3.4 On 2 May 2025 the PRM NTSN 2021 was replaced by The Accessibility National Technical Specification Notice, Issue 1 ("ACC NTSN"). Changes from the PRM NTSN to the ACC NTSN primarily focused on sections where the PRM TSI was amended in 2023 by Commission Implementing Regulation (EU) 2023/1694 and on sections where the British rail sector or Government identified a need for change and agreed solutions. The title was changed to ‘Accessibility NTSN’ to be more inclusive of the broader range of persons its requirements were intended to benefit. Changes to technical content, including decisions on whether to maintain alignment with the PRM TSI, were made on the principles that mandatory requirements in NTSNs should be strictly necessary for achieving interoperability in GB, outcome focused where appropriate, supported by GB-focused analysis, and tested with those who will be obliged to apply them. To support use of the NTSN in line with these principles, the ACC NTSN also contained a substantial redraft of the Summary and Articles section to improve clarity, reflect Government NTSN policy, and align application with the objectives and target outcomes of rail interoperability in GB. The core structure and format of the NTSN remained unchanged and still reflected that of the PRM TSI, to preserve consistency of clausal reference points within this NTSN and with other interfacing NTSNs, recognising that the changes from Issue 1 of the PRM NTSN to the ACC NTSN were limited to specific sections.

4 Progress during 2025

4.1 New vehicles in service

4.1.1 The RVAR originally imposed accessibility requirements only in relation to vehicles first brought into service after 31 December 1998. For new heavy rail vehicles, PRMTSI requirements applied from 2008 to 2020, PRM NTSN requirements applied from 1 January 2021, and ACC NTSN requirements have applied since 2 May 2025.

4.1.2 At the end of 2025, the number of heavy rail vehicles in service[5] was 15,942 (2024 figure: 15,417). Of these, 13,472 (84.5 per cent) had been built new in compliance with the applicable accessibility regulations (2024: 12,498, i.e. 81.1 per cent).

4.1.3 The number of light rail vehicles in service[6] was 5,085 (2024: 5,021), of which 2,381 (46.8 per cent) had been built new in compliance with the applicable accessibility regulations (2024: 2,241, 44.6 per cent).

4.2 Improved compliance of pre-1999 vehicles through refurbishment

4.2.1 In addition to the building of new compliant vehicles, progress has continued with improving the accessibility compliance of all older rail vehicles (built before 1999) as they undergo refurbishment. This is required in respect of light rail vehicles by the RVAR 2010, and in respect of heavy rail vehicles by RIR 2011.

4.2.2 The Department for Transport (DfT), in conjunction with the Disabled Persons Transport Advisory Committee[7] ("DPTAC"), worked with the rail industry between 2011 and 2019 to ensure that rail vehicles built before 1999 complied with the required standards by the 2020 end date.

4.2.3 At the end of 2025, the accessibility compliance of 2,470 heavy rail vehicles (15.5 per cent) had been improved through refurbishment (2024: 2,919, 18.9 per cent). Similarly, 1,164 light rail vehicles (22.9 per cent) had been improved through refurbishment (2024: 1,218, 24.3 per cent).

4.3 Exemptions

4.3.1 All of the 54 Rail Vehicle Accessibility Regulations 1998 exemption orders made for heavy rail vehicles from 1999 until 2005 had expired by the end of 2019; none remain in

[5] Heavy rail vehicle figures in this Report are drawn from the year-end data in R2 (the GB rail industry's vehicle asset management system) for vehicles 'In Working Order, In Service' - although this includes for any movements on Network Rail, including moves to or from storage or disposal sites, as well as for regular passenger-carrying services.

[6] Light rail vehicle figures are drawn from operators' published data and from the Department for Transport's annual Light rail and tram fleet and infrastructure statistics report LRT0202: Passenger carriages or tram cars on light rail and trams and undergrounds by system: Great Britain [link: https://assets.publishing.service.gov.uk/media/688243f22b6fd60b7c16101c/lrt0202.ods]

[7] DPTAC is the Government's statutory advisor on the public passenger transport needs of disabled people.

force. All of the time-limited PRM TSI and PRM NTSN dispensations, and the temporary extensions to them beyond the 2020 end date, had expired by the end of 2021.

4.3.2 Consequently, all heavy rail vehicles in normal operation were either fully compliant or, for some pre-1999 fleets, compliant in accordance with the agreed 'targeted compliance' policy. (The policy of 'targeted compliance', agreed around 2006 for pre-1999 vehicles, targets the greatest barriers to travel for those with accessibility needs, rather than scrapping otherwise serviceable vehicles or endeavouring to undertake major structural re-engineering at prohibitive cost. The scope of targeted compliance included the mandated numbers of wheelchair spaces, audio-visual passenger information system, contrasting floors/handrails/handholds, tactile and palm-operable contrasting door controls, priority seats, an accessible toilet (on trains where toilets are fitted), and compliant boarding ramps (especially with fixing pins), and was later extended to allow the non-provision of dedicated step/threshold lighting, door control enable tones shorter than prescribed, and non-provision of a door control enable tone on fleets without door controls.)

4.3.3 Section 183 of the EA 2010 enables the Secretary of State to make an exemption order authorising specified regulated rail vehicles to be used in passenger service even though they do not conform to some or all of the requirements of the RVAR 2010. Such exemption orders may contain conditions and may apply exemptions for a set time period.

4.3.4 By the end of 2025, 62 RVAR 2010 exemption orders had been made, of which 16 had expired.

4.3.5 At the end of 2025, 1,540 light rail vehicles were the subject of exemption orders (2024 figure: 1,562). Of these, London Underground's Bakerloo line, Central line and Waterloo & City line trains, totalling 952 vehicles, are undergoing RVAR upgrade. The non-compliant features being made compliant by the upgrade work have been granted time-limited exemption for the scheduled duration of each upgrade programme, and remaining non-compliances have been granted exemption for the remaining life of the vehicles until replaced by new trains.

4.3.6 At the end of 2025, 19,487 (92.7 per cent) of the combined total of 21,027 vehicles (heavy rail and light rail) had been built or refurbished to be accessible (2024: 18.876, 92.4 per cent).

4.3.7 In addition to the above, exemption orders were in force for 17 heritage vehicles, in passenger service by ten different operators.

4.3.8 DfT routinely publishes details of exemption applications on its website at https://www.gov.uk/government/publications/list-of-rvar-exemption-orders.

5 Exemption applications considered during 2025

5.1 London Underground Bakerloo line 1972 Tube stock

5.1.1 This application for exemption was brought forward from 2024.

5.1.2 Ministers decided on 6 May 2025 in favour of granting the exemption order in terms of the application.

5.1.3 The Rail Vehicle Accessibility (Non-Interoperable Rail System) (London Underground Bakerloo Line 72 Tube Stock) Exemption Order 2025 was signed by the Minister of State for Rail on 6 May 2025. It came into force on 7 May 2025 and expires on 31 December 2029.

5.1.4 The Order exempts the 72 Tube Stock vehicles from requirements of the RVAR 2010 as listed below:

Part 1 of Schedule 1:

1(1) (boarding devices at wheelchair-compatible doorways);

6(5) (route between a wheelchair-compatible doorway and a wheelchair space);

8(2) (floor of the vestibule to a passenger doorway);

8(6) (band of single colour at passenger doorway in the side of a rail vehicle);

10(1)(a) (handrails close to passenger doorways on the inside of rail vehicles);

10(4)(a) (cross section of handrail);

11(1) (public address system for audible and visual announcements);

11(5) (announcement of destination at a station when vehicle is stationary);

18(4) (number of wheelchair spaces required).

5.1.5 The Order was prepared for inclusion in the published list of RVAR 2010 exemptions list published on dft.gov.uk (link: https://www.gov.uk/government/publications/list-of-rvar-exemption-orders).

5.2 Croydon Tramlink Stadler vehicles

5.2.1 This application for exemption was brought forward from 2024.

5.2.2 The September 2024 exemption request was for an indefinite period, i.e. for the remaining life of the Stadler trams before replacement by the new trams, procurement plans for which were announced in 2024.

5.2.3 DPTAC was consulted on the request being made for indefinite exemption, rather than time-limited. The comments received were passed to the applicant, and the responses were accepted by DPTAC.

5.2.4 Ministers decided on 1 July 2025 in favour of granting the exemption order in terms of the application.

5.2.5 The Rail Vehicle Accessibility (Non-Interoperable Rail System) (Croydon Tramlink) Exemption Order 2025 was signed by the Minister of State for Rail on 1 July 2025. It came into force on 2 July 2025 and has no expiry date.

5.2.6 The Order exempts the Stadler trams from requirements of the RVAR 2010 as listed below:

Part 2 of Schedule 1:

4(2) (minimum descender ratio of 20% to upper case characters).

5.2.7 The Order was added to the exemptions list published on dft.gov.uk (link: https://www.gov.uk/government/publications/list-of-rvar-exemption-orders). It is published with an Accompanying Note, which includes consultation comments and the applicant's responses.

5.3 Hayling Light Railway Trust

5.3.1 This application for exemption was brought forward from 2024.

5.3.2 Ministers decided on 1 July 2025 in favour of granting the exemption order in terms of the application.

5.3.3 The Rail Vehicle Accessibility (Non-Interoperable Rail System) (Hayling Light Railway Trust) Exemption Order 2025 was signed by the Minister of State for Rail on 1 July 2025. It came into force on 2 July 2025 and has no expiry date.

5.3.4 The Order exempts the four regulated Hayling Light Railway Trust vehicles from requirements of the RVAR 2010 as listed below:

Part 1 of Schedule 1:

3(1) (contrast between passenger doorway door and exterior of vehicle);

3(3) (external passenger doorway audible warning devices);

3(5) (audible warning before door closes);

6(3) (wheelchair sign conforming with diagram B in Schedule 2);

10(1)(a) (handrail on the inside close to, and on either side of, the passenger doorways);

11(1), (2), (5), (6), (8), (10), (12) (public address system for audible and visual announcements);

13(1) (number of seats designated by signs as priority seats);

14(1) (steps must be illuminated by a light within or immediately adjacent to steps).

Part 2 of Schedule 1:

3 (Illumination on floor of external passenger doorway).

5.3.5 The Order was added to the exemptions list published on dft.gov.uk (link: https://www.gov.uk/government/publications/list-of-rvar-exemption-orders It is published with an Accompanying Note, which includes consultation comments and the applicant's responses.

5.4 DLR

5.4.1 This application for exemption was brought forward from 2024.

5.4.2 The Order was made on 22 July 2025 and was published on www.gov.uk. It authorises the exempt vehicles to be used even if not compliant with the following parts of the RVAR 2010:

For the B23 exempt vehicles:

(a) paragraph 1(1) (boarding devices at wheelchair-compatible doorways)

(b) paragraph 3(5)(b) (audible warning device must emit a different distinct sound not less than 3 seconds before doors start to close);

(c) paragraph 4(2) (illumination of control devices before doors start to close).

For the B2007 exempt vehicles:

(a) paragraph 1(1) (boarding devices at wheelchair-compatible doorways)

(b) paragraph 3(5)(b) (audible warning device must emit a different distinct sound not less than 3 seconds before doors start to close);

(c) paragraph 4(2) (illumination of control devices before doors start to close);

(d) paragraph 10(4)(b) (clearance for a passenger's hand between the handrail and other parts of the rail vehicle);

(e) paragraph 3 of Part 2 of Schedule 1 to the 2010 Regulations (illumination of the edge of the passenger doorway floor).

For the B92 exempt vehicles:

(a) paragraph 1(1) (boarding devices at wheelchair-compatible doorways)

(b) paragraph 3(5)(b) (audible warning device must emit a different distinct sound not less than 3 seconds before doors start to close);

(c) paragraph 4(2) (illumination of control devices before doors start to close);

(d) paragraph 6(5)(b) (width of route between wheelchair-compatible doorway and wheelchair space);

(e) paragraph 10(4)(b) (clearance for a passenger's hand between the handrail and other parts of the rail vehicle);

(f) paragraph 11(8) (visual announcements in exterior displays must comply with a minimum character height and contrast with their background);

(g) paragraph 3 of Part 2 of Schedule 1 to the 2010 Regulations (illumination of the edge of the passenger doorway floor).

5.4.3 The exemptions were made with conditions, including that the exemptions from paragraph 1(1) only apply where the relevant platform gap is not more than 85 millimetres measured horizontally. The expiry dates, depending on the particular exemption, were for the lifetime of the exempt vehicles, and 30 September 2025, 31 December 2030, 1 April 2035, 1 April 2060. The Order was provided to DLR on 22 July 2025.

5.4.4 DLR and the Department subsequently considered whether the wording of the Order accurately reflected the applicant's intent in respect of the horizontal stepping distance related to paragraph 1(1) of the RVAR 2010 and the particular condition referred to above. In order to reflect more precisely the applicant's intent, The Rail Vehicle Accessibility (Non-Interoperable Rail System) (Docklands Light Railway) (No 2) Exemption Order 2025 was prepared, to revoke the Order made in July 2025. The No.2 Order included a re-worded condition, referring to a platform horizontal gap of not more than 85 mm for platforms in Tables 1, 2 and 3 in the Order, 95 mm for platforms in Table 4, and 105 mm for platforms in Table 5. All other exemptions, conditions and expiry dates remained the same.

5.4.5 Consultation with DPTAC and the other parties previously consulted was undertaken from 4 September to 19 September 2025. No respondents had any criticisms of the proposed amendments.

5.4.6 The Order was made on 14 November 2025, and came into force the following day.

The Order made in July 2025 and the Order made in November 2025 were prepared, each with an Accompanying Note, for inclusion in the exemptions list published on dft.gov.uk (link: https://www.gov.uk/government/publications/list-of-rvar-exemption-orders).

5.5 London Underground Central line and Waterloo & City line 1992 Tube stock

5.5.1 These two applications for exemption were brought forward from 2024.

5.5.2 The 1992 Tube stock RVAR upgrade continued to be discussed with London Underground Ltd (LUL), with The Rail Vehicle Accessibility (Non-Interoperable Rail System) (London Underground Central Line 92 Tube Stock) Exemption Order 2019 and the Rail Vehicle Accessibility (Non-Interoperable Rail System) (London Underground Waterloo & City Line 92 Tube Stock) Exemption Order 2019 having expired on 1 January 2025.

5.5.3 Revised applications for exemption for Central line and for Waterloo & City line were received on 19 February 2025. These sought exemption until 1 January 2032 for

boarding devices at 18 Central line stations, contrasting floor of vestibule, doorway colour contrast, interior public address system for audible and visual announcements, and wheelchair spaces; and indefinite exemption (i.e. for remaining life of vehicles) for handrails inside passenger doorways, minimum diameter of handrails, and public address destination announcement at each station.

5.5.4 Consultation was undertaken with DPTAC, Office of Rail and Road (ORR), Transport Focus, London TravelWatch, and with the public via www.dft.gov.uk. The consultation period was 4 June 2025 to 2 July 2025. Comments received were provided to the applicant for consideration and action where appropriate.

5.5.5 Consideration of these two applications is carried forward to 2026.

5.6 London Underground Piccadilly line 1973 Tube stock

5.6.1 The Piccadilly Line Upgrade Project continued to be discussed with LUL in anticipation of the January 2027 expiry date of The Rail Vehicle Accessibility (Non-Interoperable Rail System) (Piccadilly Line 73 Tube Stock) Exemption Order 2019.

5.6.2 A draft exemption request was received on 23 September 2025.

5.6.3 Consideration of this application is carried forward to 2026.

5.7 London Underground Piccadilly line 2024 Tube stock

5.7.1 The Piccadilly Line Upgrade Project continued to be discussed with LUL in anticipation of the introduction of the new 2024 Tube stock.

5.7.2 Consideration of this application is carried forward to 2026.

5.8 Ffestiniog Railway Company new carriages

5.8.1 A potential request for exemption was discussed on 27 January 2025 with the Ffestiniog Railway in respect of new carriages brought into use since 1 January 1999. A site visit was undertaken on 2 June 2025 to discuss the extent of compliance and the particular vehicles for which application would be considered.

5.8.2 Application documents were received progressively, for different vehicle types, between June and October 2025. This sought indefinite exemption (i.e. for remaining life of the vehicles) for 27 vehicles in total:

- Ffestiniog Railway carriage numbers 22, 26, 100, 102, 103, 108, 117, 118, 119, 120, 121, 122, 150, 152, 808;

- Welsh Highland Railway carriage numbers 2021, 2022, 2043, 2044, 2045, 2046, 2047, 2048, 2050, 2100, 2115, 2152.

5.8.3 The application requested exemption in respect of boarding devices, contrasting doors, audible warning device for door operation, door handles, wheelchair compatible doorway width and signage, contrasting floors, seatback handholds, handrails, passenger

information system, priority seats, steps, transparent surfaces, wheelchair space backrest and signage, and bodyside doorway footstep lighting.

5.8.4 The application stated that the relatively high staffing levels on the two railways, provided that staff are suitably trained, means that customers can be given assistance as required. Ffestiniog Railway Company (FRCo)provides on its website a comprehensive accessibility statement, which includes information on booking (recommended for people who are mobility impaired), access into and within its carriages, wheelchair access (with wheelchairs available to borrow), toilets, assistance dogs, and staff assistance. FRCo ensures that every train includes carriages suitable for passengers with mobility impairments, and is working towards ensuring that by 2026 every train includes at least one wheelchair space.

5.8.5 Consultation was undertaken with DPTAC, ORR, Transport Focus and the Heritage Railway Association, and with the public via www.dft.gov.uk. The consultation period commenced on 5 December 2025, with a closing date on 9 January 2026.

5.8.6 Consideration of this application is carried forward to 2026.

5.9 Talyllyn Railway Company new carriages

5.9.1 A potential request for exemption was identified on 9 June 2025 with the Talyllyn Railway in respect of new carriages brought into use since 1 January 1999, especially in the last few years. A site visit was undertaken on 11 September 2025 to discuss the extent of compliance and the new-build vehicles for which application would be considered.

5.9.2 A completed exemption application was received on 22 October 2025. This sought indefinite exemption (i.e. for remaining life of vehicles) for carriages 9, 24, 25, 26 and 27.

5.9.3 The application requested exemption in respect of doorways (exterior) and through wheelchair routes, contrasting floors, handrails, passenger information, priority seats, and steps.

5.9.4 Consideration of this application is carried forward to 2026.

5.10 Corris Railway Company new carriages

5.10.1 A potential request for exemption was discussed in November 2025 with the Corris Railway in respect of five new carriages brought into use since 1 January 1999.

5.10.2 Consideration of this application is carried forward to 2026.

6 Exemptions expiring during 2025

6.1 Docklands Light Railway (DLR) B2007 vehicles

6.1.1 In the Rail Vehicle Accessibility (B2007 Vehicles) Exemption Order 2015, Article 6 stated that the exemption from RVAR 2010 paragraph 1(1) expires at the end of 29 September 2025.

6.1.2 DLR requested, and was granted, an extension of the expiry date, to 2029, to be included in the broader exemption application covering all of its fleets, reported in paragraph 5.2 above

6.2 London Underground Central line

6.2.1 In the Rail Vehicle Accessibility (Non-Interoperable Rail System) (Central Line 92 Tube Stock) Exemption Order 2019, the reference to Expiry stated:

4. Subject to Article 5, the exemptions in article 3 expire at 2am on 1 January 2025.

5. The exemption from paragraph 1(1), set out in article 3(a) expires—

(a) in relation to an exempt vehicle that is at a platform listed in Part 1 of the Schedule to this Order, when step-free access is provided to that platform or at 2am on 1st January 2025, whichever occurs first;

(b) in relation to an exempt vehicle that is at a platform listed in the table in Part 2 of the Schedule to this Order, at 2am on the day specified in that table for that platform.

LUL requested an extension of the expiry date, to 1 January 2032, as recorded in paragraph 5.5 above.

6.3 London Underground Waterloo & City line

6.3.1 In the Rail Vehicle Accessibility (Non-Interoperable Rail System) (Waterloo & City Line) Exemption Order 2019, the reference to Expiry stated that:

4. The exemptions in this order expire on the earlier of—

(a) the time when all of the exempt vehicles comply with all of the requirements of the 2010 Regulations;

(b) 2am on 1st January 2025.

LUL requested an extension of the expiry date, to 1 January 2032, as recorded in paragraph 5.5 above.

7 PRM NTSN dispensations applications considered in 2025

7.1 PRM NTSN dispensations since the 2020 End Date

7.1.1 As stated in 1.3, this document reports on the dispensations granted to heavy rail vehicles under regulation 46 of RIR 2011.

7.1.2 Since 1 January 2021, these dispensations have been granted in respect of the PRM NTSN, for the reason explained in 3.4.

7.1.3 As reported in 4.3.6, by the end of 2021 (two years after the 2020 end date) there were no time-limited dispensations still in force.

7.1.4 The RVAR 1998 Guidance stated that operators of vehicles brought into use before 1 January 1999 who propose to refurbish the vehicles are required to comply with the RVAR or seek a dispensation. This principle remains unchanged for compliance with the current regulation applicable for heavy rail vehicles, which is the ACC NTSN.

7.1.5 PRM NTSN and ACC NTSN dispensation requests considered in 2025 are recorded below.

7.2 Porterbrook Class 170 units operated by East Midlands Railway and CrossCountry Trains

7.2.1 Consideration of this application was carried forward from 2024.

7.2.2 The application for dispensation was received from Porterbrook for 64 Class 170 units operated by East Midlands Railway (EMR) and CrossCountry Trains {XCT) (170101 - 170117, 170201 - 170208, 170270 - 170273, 170397, 170398, 170501 - 170517, 170530 - 170535, 170618 - 170623, and 170636 - 170639), in respect of destination to be displayed on external bodyside, and 'Next Stop' display to be readable from all wheelchair spaces.

7.2.3 Consultation was undertaken with DPTAC, ORR, Transport Focus and with the public via www.gov.uk from 22 April to 22 May 2024. The comments received were considered by Porterbrook and addressed as appropriate.

7.2.4 Ministers decided on 26 February 2025 to grant the dispensation. It came into effect on the date of the dispensation letter, 26 February 2025, with a time limit, and subject to four conditions:

a. The dispensation applies to operation of the vehicles by East Midlands Railway and Cross Country Trains;

b. The existing level of accessibility standards compliance is maintained;

c. Information on non-compliant features of vehicles and alternative travel options is readily available to passengers to assist with informed journey planning;

d. East Midlands Railway and Cross Country Trains to assist customers with reduced mobility where and when the vehicles are in operation;

e. The permission granted by this dispensation expires at 23.59 on 31 December 2030.

7.2.5 The dispensation letter was issued on 26 February 2025.

7.3 Porterbrook Class 165 and 168 units operated by Chiltern Railways

7.3.1 Consideration of this application was carried forward from 2024.

7.3.2 The application from Chiltern Railways concerned its 39 Class 165 units (165001 - 165039) and 28 Class 168 units (168001 - 168005, 168106 - 168113, 168214 - 168219, 168321 - 168329), in respect of the requirements for a public address system for visual announcements to be fitted and to be used to announce the destination and next stop.

7.3.3 Consultation closed on 7 January 2025. Comments received were provided to the applicant for consideration and action as appropriate.

7.3.4 In accordance with previous practice, the application was considered in the light of the regulations applicable at the point of decision. Since the Class 165 and Class 168 are heavy rail vehicles, rather than light rail vehicles, the application was considered as being for a dispensation against requirements of the ACC NTSN, referred to in 3.3 above,

7.3.5 Ministers decided, on 9 July 2025, to grant the dispensation. It came into effect on the date of the dispensation letter, with a time limit, and subject to four conditions:

a. The dispensation applies to operation of the vehicles by The Chiltern Railway Company Limited;

b. The Chiltern Railway Company Limited to ensure that information in exceptional operating or emergency circumstances is as accurate, available and accessible as possible to avoid inequality for passengers who cannot hear the audible announcements;

c. The Chiltern Railway Company Limited to obtain feedback and suggestions from communities affected by the non-compliances;

d. The Chiltern Railway Company Limited to propose cost effective improvements to the passenger information system;

e. The permission granted by this dispensation expires at 23.59 on 31 December 2030.

7.3.6 The dispensation letter was issued on 9 July 2025.

7.4 Great Western Railway Class 230 Battery Electric Multiple Unit

7.4.1 An application for dispensation was received from First Greater Western Limited (GWR) concerning its Fast Charge Class 230 Battery Electric Multiple Unit (BEMU) 230001 on 29 July 2025, and in revised form following a site visit on 19 September 2025. This dispensation was in respect of exterior door operating signals, exterior door opening control height above platform, and step position for vehicle access from, and egress to, the platform.

7.4.2 Consultation was undertaken with DPTAC, ORR, Transport Focus and with the public via www.gov.uk from 26 September to 24 October 2025. The comments received were considered by the applicant and addressed as appropriate.

7.4.3 Ministers decided, on 12 December 2025, to grant the dispensation. It came into effect on the date of the dispensation letter, 12 December 2025, with a time limit and subject to five conditions:

a. The dispensation applies to operation of the vehicles by GWR;

b. Information on non-compliant features of the vehicles and alternative travel options is to be made readily available to passengers to assist with informed journey planning;

c. GWR are to assist customers with reduced mobility where and when the vehicles are in operation;

d. This dispensation expires at 02:00 on 1 January 2031;

e. GWR is to undertake by 31 December 2030 a review of the dispensation to determine if the dispensation remains necessary after that date, which shall be submitted to the Department.

7.4.4 The dispensation letter was issued on 15 December 2025.

8 Other statistics

8.1 DfT publishes other documents and statistics relating to the rail vehicle accessibility regime including:

- List of all Exemption Orders made to date;
- List of all rail vehicles built or fully refurbished to RVAR, PRM TSI, PRM NTSN or ACC NTSN;
- Most recent Annual Exemption reports.

8.2 All lists are available from: https://www.gov.uk/government/collections/rail-vehicle-accessibility-regulations-rvar-exemption-orders.

Annex A: Regulatory basis during 2025

A 1 Regulations for Light Rail vehicles

The regulatory basis for light rail vehicles during 2025 was sections 182 and 183 of the EA 2010:

182 Rail vehicle accessibility regulations

(1) The Secretary of State may make regulations (in this Chapter referred to as "rail vehicle accessibility regulations") [i.e. currently The Rail Vehicle Accessibility (Non-Interoperable Rail System) Regulations 2010] *for securing that it is possible for disabled persons—*

(a) to get on to and off regulated rail vehicles in safety and without unreasonable difficulty;

(b) to do so while in wheelchairs;

(c) to travel in such vehicles in safety and reasonable comfort;

(d) to do so while in wheelchairs. . . .

(4) In this section—

"network" means any permanent way or other means of guiding or supporting rail vehicles, or any section of it;

"rail vehicle" means a vehicle constructed or adapted to carry passengers on a railway, tramway or prescribed system other than a vehicle used in the provision of a service for the carriage of passengers on the trans-European rail system located in Great Britain;

"regulated rail vehicle" means a rail vehicle to which provisions of rail vehicle accessibility regulations are expressed to apply.

(5) In subsection (4)—

"prescribed system" means a system using a mode of guided transport ("guided transport" having the same meaning as in the Transport and Works Act 1992) that is specified in rail vehicle accessibility regulations;

"railway" and "tramway" have the same meaning as in the Transport and Works Act 1992.

(6) The Secretary of State must exercise the power to make rail vehicle accessibility regulations so as to secure that on and after 1 January 2020 every rail vehicle is a regulated rail vehicle.

(7) Subsection (6) does not affect subsection (3), section 183(1) or section 207(4)(a).

(8) Before making regulations under subsection (1) or section 183, the Secretary of State must consult—

(a) the Disabled Persons Transport Advisory Committee, and

(b) such other representative organisations as the Secretary of State thinks fit.

183 Exemptions from rail vehicle accessibility regulations

(1) The Secretary of State may by order (an "exemption order")—

(a) authorise the use for carriage of a regulated rail vehicle even though the vehicle does not conform with the provisions of rail vehicle accessibility regulations with which it is required to conform;

(b) authorise a regulated rail vehicle to be used for carriage otherwise than in conformity with the provisions of rail vehicle accessibility regulations with which use of the vehicle is

(2) Authority under subsection (1)(a) or (b) may be for—

(a) a regulated rail vehicle that is specified or of a specified description,

(b) use in specified circumstances of a regulated rail vehicle, or

(c) use in specified circumstances of a regulated rail vehicle that is specified or of a specified description.

(4) After consulting the Disabled Persons Transport Advisory Committee and such other persons as the Secretary of State thinks appropriate, the Secretary of State may—

(a) make an exemption order in the terms of the application for the order;

(b) make an exemption order in such other terms as the Secretary of State thinks appropriate;

(c) refuse to make an exemption order.

(5) The Secretary of State may make an exemption order subject to such conditions and restrictions as are specified.

(6) "Specified" means specified in an exemption order.

A 2 Regulations for Heavy Rail vehicles

The provisions in the RIR 2011, that were applicable to main line 'heavy rail' vehicles in this reporting period were:

A 2.1 Accessibility for people with reduced mobility

45. No person is to use a vehicle in the provision of a service for the carriage of passengers on the trans-European rail system located in the United Kingdom on or after 1st January 2020 unless it has been constructed, renewed, upgraded or modified to comply with the technical standards, and is operated to comply with the operational standards, required by—

(a) the TSI relating to persons with reduced mobility set out in the Annex to Decision 2008/164/EC of the European Commission of 21st December 2007(1), or any amended version of it, or any TSI which replaces it;

(b) Part 1 of Schedule 1 to the Rail Vehicle Accessibility (Non-Interoperable Rail System) Regulations 2010;

(c) the Rail Vehicle Accessibility Regulations (Northern Ireland) 2001; or

(d) the TSI, or amended version of it or TSI replacing it, referred to in paragraph (a) except to the extent that—

(i) the vehicle or its operation complies with the technical or operational standards required by the provisions referred to in paragraphs (b) or (c),

(ii) a derogation from part of it has been granted under regulation 14,

(iii) a determination that part of it does not apply has been made under regulation 13(8), and

(iv) a dispensation that part of it does not apply for the purposes of this regulation has been granted under regulation 46.

A 2.2 Dispensations

46.—(1) The Competent Authority may grant a conditional or unconditional dispensation from notified national technical rules for a particular case or description of case if the Competent Authority is satisfied that the dispensation is consistent with the essential requirements.

(2) If the Competent Authority has granted a dispensation that the Competent Authority considers has created for the purposes of Article 17(3) of the Directive a rule or restriction of a strictly local nature the Competent Authority must notify the relevant owner that the rule or restriction must be referred to in the infrastructure register.

(3) Paragraph (1) does not apply in relation to the requirements of the Rail Vehicle Accessibility (Non-Interoperable Rail System) Regulations 2010 or the Rail Vehicle Accessibility Regulations (Northern Ireland) 2001.

(4) The Secretary of State may grant for a particular case or description of case a dispensation for the purposes of regulation 45(d)(iv).

A 2.3 Change of regulation from 2 May 2025

On 2 May 2025 the PRM NTSN, which had come into force on 1 January 2021 (replacing the PRM TSI), was replaced by the ACC NTSN.

Changes from the PRM NTSN to the ACC NTSN primarily focused on sections where the PRM TSI was amended in 2023 by Commission Implementing Regulation (EU) 2023/1694 and sections where the British rail sector or Government identified a need for change and agreed solutions. The title was changed to 'Accessibility NTSN' to be more inclusive of the broader range of persons its requirements were intended to benefit. Changes to technical content, including decisions on whether to maintain alignment with the PRM TSI, were made on the principles that mandatory requirements in NTSNs should be strictly necessary for achieving interoperability in GB, outcome focused where appropriate, supported by GB-focused analysis, and tested with those who will be obliged to apply them. To support use of the NTSN in line with these principles, the ACC NTSN also contained a substantial redraft of the Summary and Articles section to improve clarity, reflect Government NTSN policy, and align application with the objectives and target outcomes of rail interoperability in GB. The core structure and format of the NTSN remained unchanged and still reflected that of the PRM TSI, to preserve consistency of clausal reference points within this NTSN and with other interfacing NTSNs, recognising that the changes from Issue 1 of the PRM NTSN to the ACC NTSN were limited to specific sections.

Consequently, the wording of letters to applicants granting dispensation in accordance with section 46 of the RIR 2011 was amended to include reference to the ACC NTSN, as well as the PRM NTSN (and the PRM TSI), as follows:

Regulation 45 of the Railways (Interoperability) Regulations 2011 (RIR 2011) makes it unlawful for a passenger rail vehicle to be used in service on the trans-European rail system in the UK after 1 January 2020 unless it complies with the Technical Specification for Interoperability - Persons with Reduced Mobility (PRM TSI) set out in the Annex to Decision 2008/164/EC of the European Commission of 21 December 2007, or any amended version of it, or Commission Regulation 1300/2014 of the European Commission of 18 November 2014 which replaced it, or the National Technical Specification Notice on Persons of Reduced Mobility that replaced Commission Regulation 1300/2014 from 1 January 2021, or any variation of that NTSN or any NTSN which replaces it (and/or defined domestic accessibility standards) except to the extent that:

a) a derogation from part of the PRM TSI or relevant NTSN was granted under regulation 14 RIR 2011 before 31 December 2020, or an exemption from part of it has been granted since that date under regulations 14 and 14A of RIR 2011;

b) a determination that part of the PRM TSI or NTSN does not apply has been made under regulation 13(8) of RIR 2011; or

c) a dispensation such that part of the PRM TSI or NTSN does not apply has been granted under regulation 46 of RIR 2011.

This is a dispensation (effective from the date of this letter) made under regulation 46(4) of the Railways (Interoperability) Regulations 2011, granting that the parts of the Accessibility NTSN (ACC NTSN) listed in Annex A do not apply to the vehicles listed in Annex B.

A 2.4 Application to Chiltern Railways dispensation

In the particular case of the Chiltern Railways RVAR exemption request for Class 165 and Class 168 reported at 7.3 above, the application was considered, in accordance with previous practice, in the light of the regulations applicable at the point of decision. Accordingly, the application was considered as a dispensation request against requirements of the ACC NTSN, and this was reflected in the wording of the dispensation letter:

This is a dispensation (effective from the date of this letter) made under regulation 46(4) of the Railways (Interoperability) Regulations 2011, granting that the vehicles listed in Annex A, which form the trains known as Class 165, need not comply with those parts of the Accessibility NTSN (ACC NTSN) or those parts of the Rail Vehicle Accessibility (Non-Interoperable Rail System) Regulations 2010 (RVAR 2010) Schedule 1 Part 1 listed in Annex B.

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