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Dear 

The accessibility of Class 317 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 Angel that were previously subject to the Rail Vehicle Accessibility Regulations 1998.

With Ben Kinderman, I assessed unit 317 501 during my visit on 17 March 2010 to Ilford depot, for compliance against the RVAR and the Technical Specification for Interoperability - Persons with Reduced Mobility. This was to validate a compliance checklist that Angel had already had completed.

As you are aware, the attached checklist shows the assessed current compliance of that 317 unit against the requirements within both standards. The checklist also sets out the Department's view on which areas of these pre-RVAR vehicles (introduced originally in 1981) 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. This should enable bidders to understand what remedial work will be necessary should they wish to use this fleet within the Greater Anglia Franchise. It was agreed that I would assess the 317/5 sub-fleet, as this was judged to be the least accessible (for example, the 317/7 sub-fleet has already been fitted with an accessible toilet).

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.
- 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
 - 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 seven principal areas where further accessibility is expected:

Doorways

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 light source across the step-edge are needed to highlight the threshold into the vehicle. Contrast is provided on the step-board but this must be cleaned regularly.

Door Controls

These will need to be replaced as they do not contrast nor do they provide tactile identification.

Both door controls are too high (although the “close” is only non-compliant by 55mm), fixed within a panel which would need to be extended in order to bring both buttons within a compliant height. Some improvement is expected. It was felt, however, that it would be acceptable to swap the position of the two controls (so that the “Open” would be only non-compliant by 55mm). This would involve significantly less work and expenditure than extending all the panels at every doorway.

The vehicle end manual door handles need to be replaced by ones which are palm-operable.

Priority seats

No priority seats are provided on the unit. The correct number of compliant priority seats, with appropriate signage, will be necessary. The seats currently fitted would be acceptable as priority seats (even though they are slightly non-compliant on width) but must be raised higher.

Handrails

The handrails in the doorways are too low. The current components could be moved upwards, to a more compliant height but are unlikely to meet the top of the required height range as this would bring them into conflict with the door controls.

Wheelchair spaces

There are currently no designated wheelchair spaces. Two will be needed for a four car unit. Emergency call-for-aids will also be required. These trains already have a large open area, where the whole saloon is fitted with longitudinal seating, which would seem to be the ideal place to create wheelchair spaces – except that they will need to access the toilet if these facilities are retained. The clearway to this area is also inadequate and would need to be improved (as has happened on other vehicles of this age).

Accessible toilet

Wheelchair accessible toilet facilities will be needed on this fleet.

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, Angel Trains 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,

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