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Dear Ian,

The accessibility of Class 150 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 a Class 150 unit during my visit to Cardiff Canton depot, with Nathan Cole of our Rail Vehicle Accessibility Team, on 14 November for compliance against the RVAR and the Technical Specification for Interoperability - Persons with Reduced Mobility. Using this as a basis, I have set out in the attached checklist the Department's view on which areas of these pre-RVAR vehicles 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 by which time all rail vehicles in public service in Great Britain must be accessible to disabled people.

Based on the Government's stated intention of an accessible rail fleet (by at least 1 January 2020) and 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. lowering the door open control button by 50mm;
 - compliance would involve significant re-engineering of the vehicle: eg
 - extending the handrail to 1200mm high would necessitate reworking the door controls; or
 - widening the single leaf doors;
 - a marginal improvement in one area could adversely affect accessibility in another: eg. making the wheelchair support structure 700mm wide would reduce the throughway to the wheelchair space.

- Areas where the vehicles already partially comply but where further compliance is expected (shown as blue with red checks): eg.
 - audible warnings are given when the doors close but not when they become openable by passengers;
 - an audible PA system is fitted but not a visual passenger information system; and
 - some priority seats are fitted but there are insufficient numbers;
- 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 a visual passenger information system (including a call-for-aid in the wheelchair space);
 - fitment of an accessible toilet if a toilet is to be retained; and
 - compliant door handles on inter-vehicle doors.

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.

There are six 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.

A light source and a contrasting band across the doorway are needed to highlight the threshold into the vehicle.

Door controls

The existing finger-grip latches on inter-vehicle doors should be replaced with lever handles which contrast with the doors, and can be operated with a force less than 20 newtons.

Priority seats

Although some existing seating positions on the assessed units meet the requirements for priority seats, they are not labelled as such. Appropriate signage needs to be displayed. and additional priority seats need to be provided.

Passenger Information System

Although an audible PA system is installed on these units, no visual PIS is fitted and this will need to be installed.

Accessible toilet

If toilet facilities are to be retained on these units, these will need to be wheelchair accessible. You are aware that DeltaRail is developing a possible solution for the particularly tight size restraints on Class 158s, which may also be of use on Class 150s. Based on a recent assessment of their concept mock-up, we and members of the Disabled Persons Transport Advisory Committee believe that DeltaRail's solution provides the accessibility required by RVAR and the PRM TSI.

Wheelchair spaces and signage

A call-for-aid needs to be installed in both wheelchair spaces. Additionally, only one of the two spaces has a cup holder and this should be provided in both, since similar facilities

are provided at seats. The external signage denoting the wheelchair space also needs to be replaced with signs which meet the required dimensions.

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 Rail & National Networks, Transport Wales 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) 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, Mark Price at Transport Wales 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
Rail Safety (Advice) & Rail Vehicle Accessibility Manager