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Dear Nick,

The accessibility of Class 321 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 HSBC that were previously subject to the Rail Vehicle Accessibility Regulations 1998.

HSBC provided a useful checklist, showing the Class 321 vehicles' current compliance against the standards within both the RVAR and the Technical Specification for Interoperability - Persons with Reduced Mobility, which I was able to use when assessing a unit during my visit to Ilford depot, with Nathan Cole of our Rail Vehicle Accessibility Team, on 11 June.

You asked for 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, we have amended the attached checklist to show:

- The areas on the vehicles which are already compliant with either RVAR or the PRM TSI (labelled with green);
- The non-compliant areas on the unit which it would appear are already being addressed within the planned programme of works (green with red checks);
- 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; or
 - compliance would involve significant re-engineering of the vehicle: eg closing the step riser is not possible without reworking the entire door mechanism; or

- a marginal improvement in one area could adversely affect accessibility in another: eg. requiring handrails in the doorways to achieve the compliant width would reduce the door throughway on these busy commuter units.
- The non-compliant areas on the vehicle where we expect some work to be done to bring them closer to compliance, without achieving full compliance with either RVAR or the PRM TSI (labelled with yellow and red checks): eg. extending the vertical handrail in the external doorway (but avoiding conflict with the existing door controls) or allowing seats that are 10mm too narrow to be used as priority seats, provided that clearances, height, etc are made compliant;
- 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.

Principally, there are three areas where further accessibility is expected, beyond the existing scope of works:

Toilet

The toilet will need to be made wheelchair accessible if it is retained. We have already mentioned that Delta Rail is developing a possible solution to this issue for Class 158s, which we and members of the Disabled Persons Transport Advisory Committee believe may be suitable (in theory, at least).

Doorways

The external doorways lack a number of audible warning features (such as external sounders and 'door enabled' indications). There are also no lights fitted to illuminate the steps.

Wheelchair spaces

A second wheelchair space is required. Only one, non-compliant, wheelchair space is fitted to these units and this lacks a call-for-aid – nor is it currently in the same vehicle as the toilet.

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 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.

I am copying this to Brian Freemantle and Peter Randall here, and DPTAC.

Yours sincerely,

John Bengough
Accessibility Technical Standards Manager