

EXPLANATORY MEMORANDUM TO
THE RAIL VEHICLE ACCESSIBILITY (NON-INTEROPERABLE RAIL SYSTEM)(LONDON UNDERGROUND METROPOLITAN LINE S8 VEHICLES) (BOARDING DEVICES) EXEMPTION ORDER 2013

2013 No. 1931

1. This explanatory memorandum has been prepared by the Department for Transport ("the Department") and is laid before Parliament by Command of Her Majesty.

This memorandum contains information for the Joint Committee on Statutory Instruments.

2. **Purpose of the Instrument**

2.1 The Rail Vehicle Accessibility (Non-Interoperable Rail System)(London Underground Metropolitan Line S8 Vehicles) (Boarding Devices) Exemption Order 2013 (the "Order") exempts specified rail vehicles operated by London Underground Limited ("LUL") from one requirement, relating to the use of boarding devices, under the Rail Vehicle Accessibility (Non-Interoperable Rail System) Regulations 2010¹ ("RVAR") at certain platforms on the Metropolitan line. This is explained in further detail in paragraphs 7.2 to 7.16.

3. **Matters of special interest to the Joint Committee on Statutory Instruments**

3.1 The Rail Vehicle Accessibility Exemption Orders (Parliamentary Procedures) Regulations 2008 (the "2008 Regulations") govern how exemption orders such as this are to be made.² Under the 2008 Regulations, orders exempting rail vehicles from RVAR without an expiry date, as is the case with this Order, would normally be subject to the draft affirmative resolution procedure. However, regulation 5(2) of the 2008 Regulations provides for the Secretary of State, having regard to the circumstances and representations of the Disabled Persons Transport Advisory Committee³ ("DPTAC"), to elect to make orders which would otherwise be subject to the draft affirmative procedure, using the negative resolution procedure instead.

3.2 Equivalent exemptions, in a number of cases without expiry dates, have previously been granted for the same class of vehicles at a number of platforms on the Metropolitan Line by the Rail Vehicle Accessibility (London Underground Metropolitan Line S8 Vehicles) Exemption Order 2010⁴ (the "S8 Order") and a further 6 platforms (in 5 cases without expiry dates) were added by the Rail Vehicle Accessibility (Non-Interoperable Rail System) (London Underground Metropolitan Line S8 Vehicles) Exemption Order 2011(the "2011 Order")⁵. The S8 Order was subject to the draft affirmative resolution procedure while the 2011 Order was subject

¹ S.I. 2010/432

² S.I. 2008/2975, see in particular regulation 5.

³ DPTAC was established under section 125 of the Transport Act 1985 to advise the Government on the public passenger transport needs of disabled people.

⁴ S.I. 2010/435

⁵ S.I. 2011/70

to negative resolution procedure. As noted below (paragraph 4.6) this Order consolidates the list of Metropolitan Line platforms to which the boarding device exemption has applied under the S8 Order and the 2011 Order with the exemption having been removed in some cases and extended in some others. A precedent for this exemption was established by the S8 Order; therefore the Secretary of State believes that Parliament's time can more effectively be used on other matters.

3.3 The Secretary of State consulted DPTAC on the use of the negative resolution procedure to make those exemptions which he believes are appropriate. DPTAC was content with the use of the negative resolution procedure on this basis. The Secretary of State has therefore decided to use his discretion under regulation 5(2) of the 2008 Order to decide that the negative resolution procedure should be adopted for this Order.

4. Legislative Context

4.1 Section 182 of the Equality Act 2010 (the "EA") empowers the Secretary of State to make rail vehicle accessibility regulations to ensure that it is possible for disabled persons, including wheelchair users, to travel in safety and reasonable comfort in those vehicles to which the regulations apply. The EA repealed the Disability Discrimination Act 1995 ("DDA") and replaced those parts applying to rail vehicles (sections 46 and 47 of the DDA as well as section 67 of that Act which related to the power to make regulations and orders) with equivalent provisions (sections 182 to 187 and 207 of the EA).

4.2 The Rail Vehicle Accessibility Regulations 1998 ("RVAR 1998") were made under powers of the DDA and initially applied to rail vehicles constructed or adapted for passenger use and first brought into use after 31st December 1998. A number of amendments were made to RVAR 1998 in 2000. In 2010 they were revoked and replaced by RVAR; although the relevant provisions relating to boarding ramps for wheelchair users remained substantively the same.

4.3 Equivalent exemptions to those in the Order, from regulation 23(1) of RVAR 1998, came into force in February 2010 (the S8 Order, see paragraph 7.4 below) in respect of 65 station platforms on the Metropolitan Line. Although RVAR 1998 has since been revoked, the transitional provisions of RVAR ensure that those exemptions remain in force.

4.4 An additional six platforms were similarly exempted from the boarding requirement by the 2011 Order, as LUL advised the Department of previously unidentified service patterns that might need to use those platforms during service disruption. That additional exemption was made using the negative resolution procedure, which further supported the Secretary of State's decision to use his discretion and to allow this Order to be made using the same procedure (see paragraph 3.3 above)

4.5 Section 183 of the EA enables the Secretary of State to make an order authorising regulated rail vehicles to be used in passenger service without requirements of the RVAR having to be met. These orders may impose conditions and restrictions on the exemptions.

4.6 This Order has been made as a stand alone exemption order. The S8 Order, in granting similar exemptions, made reference, as noted above, to provisions of the RVAR 1998 which have now been replaced by equivalent provisions in RVAR. In view of this, it was considered it would be inappropriate and potentially legally uncertain simply to amend the lists of platforms in the S8 Order to which the original exemptions applied. It was not considered practicable at the present time to revoke the S8 Order in its entirety and replace it with an amended Order but the opportunity has nonetheless been taken to consolidate in the present Order all the exemptions from the requirement to provide boarding devices set out in both the S8 Order and in the 2011 Order. The 2011 Order has also therefore been revoked. This ensures that all exemptions in relation to boarding devices and the Metropolitan Line S8 vehicles are contained in one stand alone instrument. Consideration will, however, be given to consolidating all exemptions for that London Underground fleet when a suitable opportunity arises.

4.7 The S8 Order provided Ruislip platform 1 with an untimed exemption from the boarding devices requirements and a change to this did not form part of LUL's recent application. Following discussion with LUL, it has however been moved alongside the exemption provided for Ruislip platform 2 to provide consistency in relation to when the exemptions for both platforms at Ruislip end (see further below at paragraphs 7.11 and 7.12).

5. Territorial Extent and Application

5.1 This instrument applies to Great Britain.

6. European Convention on Human Rights

6.1 As the instrument is subject to the negative resolution procedure and does not amend primary legislation, no statement is required.

7. Policy Background

7.1 The policy objectives of the EA, in relation to rail vehicle accessibility are to ensure that all rail vehicles first brought into use after 31st December 1998 are designed and required to be used so as to ensure disabled persons can board them in safety and without unreasonable difficulty, do so whilst in wheelchairs and travel in them in reasonable safety and comfort. The EA also requires all rail vehicles to be accessible by 1 January 2020. Where applications are received for exemption from RVAR requirements, each is considered on a case by case basis. The Order grants some of the exemptions requested in LUL's application, subject to certain conditions.

7.2 In this instance LUL, the operator, took delivery of 58 new eight-car S8 trains on the Metropolitan Line for use from May 2010 onwards. The Metropolitan line presents particular challenges because many elements of infrastructure, including platform alignments, were built (up to) 150 years ago when attitudes towards customer accessibility were very different. Some platforms are severely curved or of compromised height where the line is shared with other LUL or National Rail train fleets. In these circumstances, the platforms must make allowances for the different

height, size and shape of trains which use the same track and platforms, and do not conform to LUL standards.

7.3 As result, LUL identified a small number of cases where compliance with accessibility requirements presented a substantial and complex challenge to its operations.

7.4 Exemptions from five requirements of RVAR were granted by the S8 Order. One of the exemptions related to the requirement to fit boarding devices between the wheelchair compatible doorways on a regulated vehicle and a platform where there is a gap exceeding 75 millimetres measured horizontally and/or 50 millimetres measured vertically. Exemptions were granted under the S8 Order in 65 instances on the Metropolitan Line where the platform, station and exempted vehicles were specified. A further six platforms were exempted in 2011 (see paragraph 4.4 above).

7.5 Exemptions at nine of the original 65 platforms that were exempted by the S8 Order expire on 31 August 2013. Those were platforms at Uxbridge, Hillingdon, Rayners Lane and Ruislip, which are all situated on the Uxbridge branch of the Metropolitan Line. Unlike the other stations on that branch, platforms at Uxbridge and Hillingdon are straight and there is step-free access off the whole station – so the Department would not normally have considered granting an exemption in such cases. However, platforms on this branch are shared with smaller Piccadilly Line trains and so are set at a “compromise height”. Raising the platforms to provide level access to the S8 stock would worsen the step down into the Piccadilly Line trains, so exemptions until 31 August 2013 were granted to enable LUL to further explore potential solutions. LUL’s application (see Annex A) explains the work it has undertaken to find a solution. Ruislip platform 2 similarly has step-free access so was given a timed limited exemption for the same reason.

7.6 Following the success of Manual Boarding Ramps (MBRs) during the Olympic and Paralympic Games in 2012, LUL indicated that these would probably be deployed at 19 stations across the network (including Uxbridge and Hillingdon) as these have step-free access to the street from every platform but that more time was needed to put these in place. Therefore, earlier this year, they applied to extend the exemptions at these two sites by one year to August 2014.

7.7 By the time the current exemptions at those sites expire, it will have been over a year since MBRs were first used, for the Olympic Games. The Department therefore suggested that a one year extension might be excessive and that six months might be more appropriate. The Department also shared that position with consultees (see paragraph 8.2 below).

7.8 On 30 April, LUL announced that it would definitely be deploying MBRs at 19 stations (including Uxbridge and Hillingdon) “this summer”. It indicated, however, that it wished to persist in its application for an extension of one year for those two sites. Having considered the issue, and consulted stakeholders, the Secretary of State has decided not to extend the exemptions at Uxbridge and Hillingdon as he is keen to see MBRs deployed on a permanent basis as rapidly as practicable. LUL have been informed of this and therefore have been able to plan for the exemption to end on 31 August this year.

7.9 Although Rayners Lane does not have step-free access to either platform, it is the last point on the route (when travelling into London) where someone could interchange between the Metropolitan and Piccadilly lines. Because of this potential for interchange, a time limited exemption until 31 August 2013 was granted, to establish whether a solution to “compromise height” platforms could be found. As LUL explain in their application, no solution that provides level access to both fleet types at compromise height platforms has yet been found. LUL therefore applied to extend the exemption at Rayners Lane until a solution is found, or step-free access is provided throughout that station. Following consultation (see section 8 below) the Secretary of State has decided to extend the exemption at Rayners Lane.

7.10 The Rayners Lane exemption will remain in place until there is either step free access from the station entrance to both platforms (at which point we would expect to see MBRs deployed) or until wheelchair users can alight and board Piccadilly Line services (as this would create useful interchange options).

7.11 The position is the same for Platform 1 at Ruislip (ie no step free access to the station entrance and no access for wheelchair users to Piccadilly Line trains). The conditions under which the existing exemption for Ruislip platform 1 expires have therefore been extended on the same basis as that for Rayners Lane (i.e. until there is either step free access from it to the station entrance or until wheelchair users can alight and board the Piccadilly Line).

7.12 Ruislip platform 2 does have step-free access to the station entrance, but LUL wishes to avoid confusion at this station and not advertise it as accessible (as this is correct in one direction only on the Metropolitan line). Following consultation the Secretary of State has therefore decided to extend the exemption at Ruislip platform 2. This too will expire either when step free access from both platforms to the station entrance is achieved or once wheelchair users can alight and board the Piccadilly Line).

7.13 At present wheelchair users cannot safely board Piccadilly Line services at either Ruislip or Rayners Lane because the height of the platforms necessitates a step down into the smaller Piccadilly Line trains - this cannot currently be safely bridged by a boarding device.

7.14 The Secretary of State has the power to revoke the exemptions by Order if they are no longer appropriate.

7.15 We explained in paragraph 4.6 above, that we have taken the opportunity to consolidate all the exemptions relating to boarding devices and the Metropolitan Line S8 vehicles in one instrument. We also asked LUL to provide an update on their programme of providing level access on this line, so that we did not include in this Order any exemptions that were no longer necessary. This has resulted in exemptions at Barbican, Euston Square, Liverpool Street (platform 2) and Moor Park (platforms 1 and 2), which appeared in Table 1 Schedule of the S8 Order and which were due to expire later in 2013, not being retained. This is because LUL is ahead of schedule and has already completed the work that provides level access between the train and platforms at those sites.

7.16 In addition, Farringdon and Rickmansworth platform 2 (which appeared in Table 3 Schedule of the S8 Order, with untimed exemptions due to the gaps caused by their curved platforms) have not been included in this Order as they will receive MBRs (although Rickmansworth platform 2 has no step free access to the street, an MBR is being provided in order to facilitate interchange to the Chiltern train services that also call at that station).

7.17 The exemptions granted by this Order are specific to certain station platforms, to the Metropolitan Line and to LUL's operational requirements, meaning they would not apply if the vehicles were used on another network or at other stations.

8. Consultation Outcome

8.1 Section 183(4) of the EA 2010 requires the Secretary of State, as part of his consideration of an application for exemption, to consult DPTAC together with any other appropriate persons. The application was also posted on the Department's web site.

8.2 When sending LUL's application to DPTAC, the Office of Rail Regulation (ORR) and London TravelWatch (LTW), officials indicated that they felt that a maximum of six month extension to the exemptions at Uxbridge and Hillingdon might be more appropriate – as LUL had already indicated that it would probably deploy MBRs at those sites at some point (see paragraph 7.6 above). LTW indicated that it supported that approach, while the ORR suggested that MBRs could be deployed at Uxbridge (as it is a terminus) without delay and that no extension for that site should be granted.

8.3 Following the 30 April announcement from LUL that MBRs would be deployed at Uxbridge and Hillingdon “this summer”, the Secretary of State indicated that he was not minded to extend the exemptions at those two sites. In its response DPTAC supported this, and supported extensions at Rayners Lane and Ruislip Platform 2. Copies of the ORR and DPTAC replies can be found at **Annex B**. DPTAC was content for the Order to be dealt with under the negative resolution process.

8.4 Having considered the merits of LUL's application, and following consultation, the Secretary of State has decided to grant the exemptions requested with regards to Rayners Lane and Ruislip platform 2 but not for Uxbridge and Hillingdon.

9. Guidance

9.1 Comprehensive guidance on the application of RVAR 1998 has been published.⁶ This remains relevant to RVAR.

10. Impact

⁶ See www.dft.gov.uk/transportforyou/access/rail/vehicles/pubs/rva/rvareg1998

10.1 An Impact Assessment has not been prepared for this instrument as it has no impact on business, charities or voluntary bodies.

10.2 The impact on the public sector is beneficial – through the saving of expenditure on accessibility requirements that would add no value.

11. Regulating small business

11.1 The Order does not apply to any small businesses.

12. Monitoring & Review

12.1 The Government's policy objective is to ensure that the number of exemptions is minimised and that new and refurbished rail vehicles are as compliant as possible with the requirements of RVAR.

12.2 Since the Order contains exemptions which are not time limited, the Secretary of State will keep these provisions under review and will consider whether to revoke these in future, in consultation with stakeholders, if it were felt that these were no longer appropriate. As shown in 7.15 and 7.16, he has already done this with regard to a number of sites where LUL has completed work to provide level access or a boarding aid.

12.3 The Office of Rail Regulation is the enforcement body for RVAR and is responsible for ensuring that LUL's fleets comply with accessibility requirements to the extent permitted by this, and other, Orders.

13. Contact

John Bengough at the Department for Transport (Tel: 020 7944 5035 or e-mail: john.bengough@dft.gsi.gov.uk) can answer any queries regarding the Order.

1. Full name of applicant and address

London Underground Limited
55 Broadway
London
SW1H 0BD

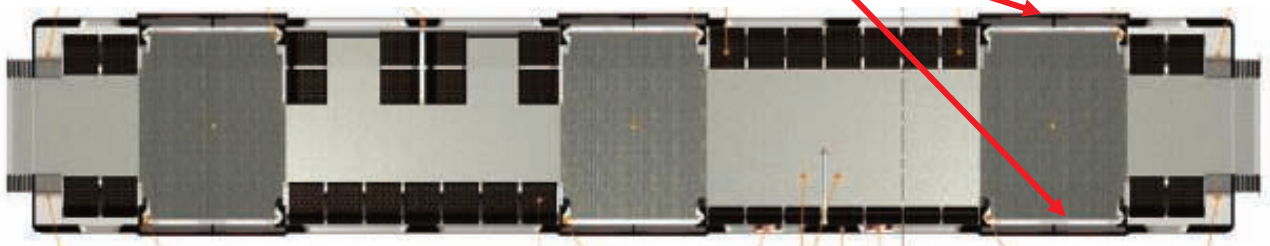
2. Description of Rail Vehicles

Metropolitan Line 'S8' Stock trains Vehicles numbers: 24001 - 24116

This exemption only applies to the **116** 'MS' cars which will be used as the middle two cars in each train. They differ in layout to the other cars in the train as they contain the wheelchair spaces. The exemption relates specifically to the wheelchair compatible doorways in these carriages.



Position of Designated Wheelchair Accessible Doorways



3. Circumstances in which exemptions are to apply

At all times in passenger service, when a Metropolitan line S8 train stops at a Metropolitan line platform where:

- a) there is no step-free route from the platform out of the station,
- b) there is no step-free route between that platform and platforms for other London Underground Limited (LUL) lines or national rail services: or
- c) It is not physically possible to bring the dimensions of the step and/or gap within the maximum permitted tolerances.

Exemptions requested are listed below:

Station	Platform	Exemption requested until
Hillingdon	1	31 August 2014
Hillingdon	2	31 August 2014
Rayners Lane	1	Until such time as level access may be provided on the Piccadilly line, or there is step-free access to the platform. Untimed
Rayners Lane	2	Until such time as level access may be provided on the Piccadilly line, or there is step-free access to the platform. Untimed
Ruislip	2	Until such time as level access may be provided on the Piccadilly line, and there is step-free access to platform 1. Untimed
Uxbridge	1	31 August 2014
Uxbridge	2	31 August 2014
Uxbridge	3	31 August 2014
Uxbridge	4	31 August 2014

4. Relevant requirements from which exemption is sought

Schedule 1, Part 1 (General Requirements) Paragraph 1(2)

1(1) Subject to sub-paragraph (2), when a wheelchair-compatible doorway in a rail vehicle is open at a platform at a station, or at a stop, a boarding device must be fitted by the operator between that doorway and the platform, or the stop, if a disabled person in a wheelchair wishes to use that doorway.

1(2) Sub-paragraph (1) does not apply where the gap between the edge of the door sill of the wheelchair-compatible doorway and the platform, or stop, is not more than 75 millimetres measured horizontally and not more than 50 millimetres measured vertically.

5. Technical, economic and operational reasons why exemption is sought

London Underground (LUL) is requesting a series of temporary exemptions to enable us to fully review the locations listed in section 3 for suitability of manual boarding ramp use as a means of providing level access between the train and the platform.

LUL currently has temporary exemptions for the platforms listed in section 3, and these expire on 31 August 2013. These exemptions were granted on the basis that there was no suitable boarding solution for Compromise Height (LUL) platforms and to enable further investigation.

LUL is also requesting untimed exemptions for platforms 1 and 2 at Rayners Lane and platform 2 at Ruislip until such time as level access may be provided to

the Piccadilly line and useful interchange is available or until step-free access to those platforms and platform 1 at Ruislip is achieved.

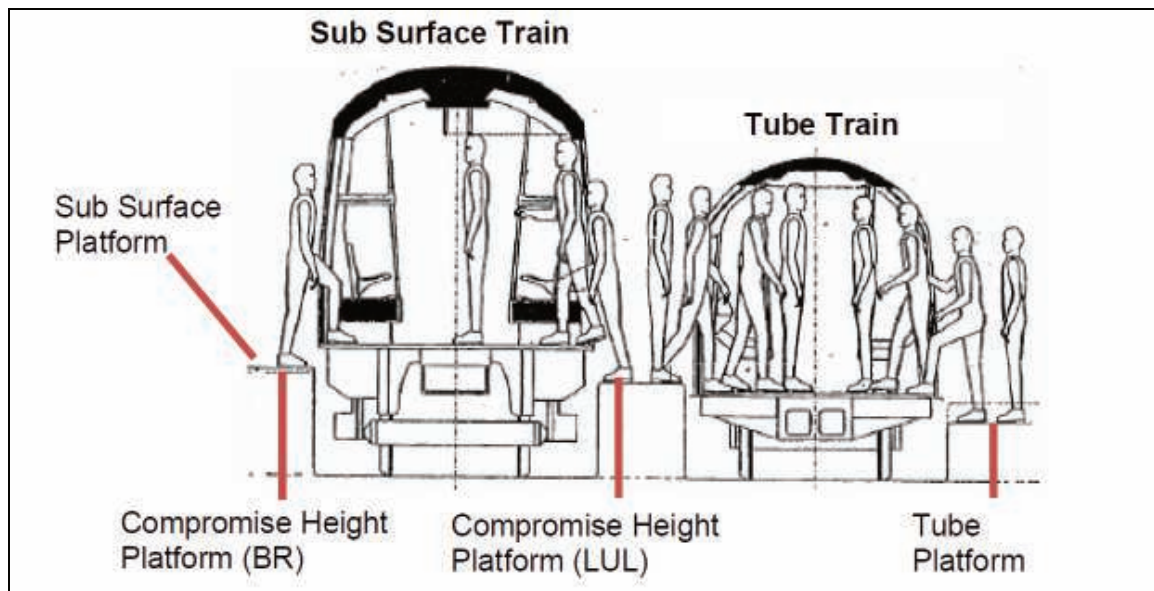
The untimed exemption for Ruislip 2, which is step free to street, is being requested in order to avoid inconsistent step free accessibility at this station. LUL currently has an exemption in place for platform 1 which will apply until there is step-free access. We believe that this approach is necessary to prevent passengers from getting stranded where there is no step-free route from the platform and avoid the confusion, inconvenience and distress that a passenger could experience in these circumstances.

Background:

On the Uxbridge branch of the Metropolitan Line the stations served by the S Stock are shared with the Piccadilly Line, which runs 1973 Tube Stock (73TS). Therefore, when undertaking physical changes to the infrastructure, the requirements for access and egress to the 73TS, as well as the S Stock must be considered.

Rayners Lane to Uxbridge platforms are Compromise Height Platforms (LUL) platforms which have been set at a compromise between the floor height of both the now withdrawn A Stock and the 73TS. However, this height creates a significant step up into the S Stock and a greater step down into the 73TS.

As shown in the diagram below, passengers have to step up into the larger Metropolitan line trains and step down in to the smaller Piccadilly line trains



Platform Heights on the Metropolitan line

Changing the platform to achieve level access for the S Stock would increase the step down onto the 73TS to 283mm. This is expected to be a much greater hazard to a range of passengers, including mobility impaired persons, visually impaired persons, children and those accompanying them and people with suitcases or baggage, than the current platform heights. It is noted that in many cases, those with children in pushchairs or encumbered with large baggage

attempt to board / alight the train backwards and are therefore unlikely to see the step and react to it. If they are not expecting such a large step they may trip and fall into or out of the train.

However, since making the previous exemption application, LUL has trialled the use of ramps at 16 stations during the Olympic & Paralympic Games. This service was well-received by both customers and staff, with no significant issues or incidents reported. As a result of this success, LUL retained the ramps in use at the 16 locations, and the opportunities for their continued use have been evaluated.

The demand for our service during the Olympics and Paralympics, and the service we supplied in response, was considerably different from that during 'normal operations'. Differences were seen in customer numbers and distribution throughout the traffic day, types of journeys being made, popular destinations and our service frequency and staffing models. The focus of the evaluation was on whether we can provide a ramp service during normal operations that is consistently acceptable both to our customers using it and operationally. This evaluation is now complete and the decision has been made to roll out the use of manual boarding ramps on London Underground.

Our aim now is to review those stations served by S8 trains which are existing step-free stations and platforms, planned step-free stations and platforms or have existing or planned step-free interchange between platforms or stations and platforms regularly used as termination or reversing points and at which permanent works were not feasible for suitability of manual boarding ramp use.

This work will involve a platform by platform review and will require time to introduce and complete.

This exemption is requested to give us some time to complete these actions.

Significant work has gone into investigating possible solutions to the problem in this area. Further detail can be found in Annex A.

6. The effect which non-compliance would have on a disabled person's ability to use rail vehicles of the description to which the application relates

LUL has sought to minimise the effect of these exemptions on disabled peoples' ability to travel.

Whilst LUL understands that the size of the step and gap between the train and platform will cause a problem for a number of disabled people, in particular some wheelchair users, we believe that this is a positive approach and is the most appropriate way forward at this time.

The lower floor design of the S8 train has improved access at all platforms by reducing the vertical step, even if it does not bring it within the dimensions required by the RVAR. This will benefit a large number of disabled passengers, however we are aware that, regrettably, some disabled people, in particular

wheelchair users, will not be able to board the trains at compromise height platforms which includes those listed above, unless they are able to navigate the step and gap.

The use of ramps over the Olympic period gave LUL an insight into their potential use on our network, and further analysis has enabled a positive decision about their ongoing use to be made. However, further work is required to enable identification of suitable locations and for roll out to commence.

Any future plans to make Rayners Lane step free will include works to bring the step and gap within the permitted dimensions, unless there are any additional infrastructure constraints such as severe curves.

In the event of service failure or an emergency, passengers will be 'detrained' using the appropriate operational procedure and evacuation equipment.

7. Any measures which could be taken to enable disabled persons to use the rail vehicle if exemption sought is granted

LUL is requesting a series of temporary exemptions to enable us to fully review the locations listed in section 3 for suitability of manual boarding ramp use as a means of providing level access between the train and the platform.

In this area, and others like it, we recognise that the Underground offers limited travel opportunities to a number of disabled people whilst this work is ongoing. However Transport for London (TfL) - of which London Underground is a part – does operate a number of other transport modes which cover the area served by the Metropolitan line, although it is acknowledged that these may not offer a directly comparable service.

A summary of some of the journey options available is shown below:

TfL Bus Services

All of London's buses are now low-floor with designated wheelchair spaces and priority seats. Most buses are equipped with a state-of-the-art information system, iBUS that will provide next stop information in visual and audible formats as well as real-time passenger information at bus stops and on board buses.

TfL Assisted Travel services

Door-to-door services, such as Dial-a-Ride and Taxicard, offer subsidised personal travel for older and disabled people who find it difficult or impossible to use mainstream public transport. TfL has provided a significant level of funding to increase the provision of these door-to-door services for the people who require them. It has also implemented "Capital Call" which provides services with private hire vehicles in areas poorly served by black cabs.

TfL's Public Carriage Office regulates taxi and private hire trade in London and ensures that all 20,000 black cabs are accessible for wheelchair users.

Although these alternative modes may not provide directly comparable services and journey times, some users may be able to reduce the additional journey time by using assisted travel to the nearest station with step-free and level access, where they could continue their journey by Underground.

Customers are able to get information about the accessibility of individual platforms, including information about the size of the step and gap in the following ways:

- **Step-Free Tube Guide:** this guide is designed for people who need specific information about the size of the steps and gaps between the train and the platform, and information on which stations are step-free from street to platform. Detailed information on step-free stations on the Metropolitan line will be included in this guide.
- **TfL Journey Planner website:** this contains options to 'personalise' a journey search by a number of accessibility criteria, including 'wheelchair accessible vehicles'. TfL Journey Planner will be updated as appropriate to ensure that suitable journey planning information for the Metropolitan line stations will be given. This information can also be obtained by phone from the TfL Customer Service Centre.
- **Station staff** will be provided with specific instructions, and where necessary local training, to ensure that they are able to provide suitable assistance to customers requiring an accessible journey, including alternative journey options.

8. Any proposals for later modification of rail vehicles to secure compliance with RVAR within a stated period

LUL is requesting a series of temporary exemptions to enable us to fully review the locations listed in section 3 for suitability of manual boarding ramp use as a means of providing level access between the train and the platform.

9. Unless permanent exemption sought, the period during which exemption is to apply.

London Underground is requesting temporary exemptions in line with the timescale set out in Section 3 above.

Annex A: Work done by LUL to investigate possible solutions to the problem in this area.

Strategy

London Underground's aim has always been to provide a 'turn up and go' service which allows passengers the greatest level of independent access without the need for staff intervention and assistance.

LUL understands the importance of a seamless accessible route from the street through the station and on to the train. We recognise that, in addition to access barriers between the street and platforms, the step and gap between the platform and train can cause a significant problem for many passengers.

To make the most effective use of our resources we have focused on those platforms which will give maximum benefit to disabled customers. This approach was agreed with DfT and DPTAC during the development of the Victoria Line Upgrade (VLU) exemption in 2008, and was supported as a pragmatic response by all involved during the debates in Parliament. In this way we have carried out level access work at platforms which are not LUL Compromise Height or severely curved which are:

- existing or planned step-free access,
- step-free interchange routes between platforms, or
- Potential turning or terminus points.

This solution takes account of the reality that regrettably many underground stations are not currently accessible to all passengers, especially wheelchair users and others with mobility impairments.

In line with this, in previous exemption applications, LUL has made the case that Manual

Boarding Ramps (ramps) were not an appropriate solution at our stations for the following reasons:

- Concern regarding the impact of deploying these ramps on the safety of our staff, disabled passengers and other passengers.
- Increased hazard as a result of their use on narrow platforms with a high density of users.
- Potential impact on our short dwell times and impact on the service as a whole.
- Impact on staffing levels and costs. It would also mean a significant change to the existing roles and responsibilities of our station staff.
- Unlike physical works, ramps would not offer an appropriate solution to all passengers who may struggle with the step and gap as they are likely only to be deployed for wheelchair users.

Therefore, we have invested a great deal of time and money to investigate, develop and implement permanent physical solutions to bring the step and gap within the required limits. Platform and nosing stone works have been successfully completed at 33 platforms on the Metropolitan line and £9,593,000

has been spent on platform modifications across the subsurface lines⁷. The Platforms which have been brought within the required dimensions of RVAR are those which are technically possible and which provide most benefit to our customers.

However, despite this work, it has not been possible to implement such physical works on platforms which are severely curved or of LUL Compromise height (LUL).

Other platforms on the Uxbridge Branch of the Metropolitan Line not listed in section 3 are not accessible from the street, do not provide useful interchange or are severely curved and un-timed exemptions to the RVAR have already been granted. These will be reviewed at such a time as the stations' infrastructures are modified, but remain in place until then.

A list of the Metropolitan line compromise height platforms (LUL) is given in Annex B.

LUL has previously investigated the possible changes to platforms heights and service patterns which might have had the potential to achieve boarding requirements.

In 2008 London Underground commissioned an independent external company, Frankhams Consultancy Group to investigate the options and impacts at shared compromise height platforms to achieve RVAR compliance.

The Frankhams Report concluded that whilst technical solutions to achieve compliance for one rolling stock type were already available, e.g. platform humps or track adjustments, such changes would have a significant negative impact upon safety and operations of the other rolling stock using that platform. The Frankhams Report further concluded that service pattern changes, which would effectively segregate rolling stock so that they do not use the same platforms, would be the only feasible way of achieving RVAR compliance at those sites. Such service segregation would permit the usual technical solutions to be used.

In 2005 London Underground undertook a comprehensive analysis of service patterns in West London, concentrating on the Sub Surface and Piccadilly lines. The study analysed the relative merits of the current service plans versus more radical service pattern changes, such as the swapping of Piccadilly and District branches to Uxbridge and Ealing Broadway respectively, with a view to shaping the upgrade plans which were in development at the time. A number of options also considered service changes to the Uxbridge branch, including options which would permit technical solutions to be introduced to achieve RVAR compliance.

The more radical of these options, involving running District line trains to Uxbridge and diverting Piccadilly line trains away from this branch (i.e. service segregation which would remove the dual stock issue) were judged to represent poor value for money in the assessment. It is important to note that 'poor value for money' takes into account a number of criteria, including; the social disbenefit

⁷ Metropolitan, District, Hammersmith and City and Circle lines

of making the change (i.e. who benefits and who is disadvantageded); the capital costs; the revenue implications and the operational impacts.

Continuing to run Piccadilly line trains on the Uxbridge branch, but terminating this service at Rayners Lane, with only Metropolitan line trains running beyond Rayners Lane fared slightly better in the analysis.

However, this option would require works to provide the necessary reversing capacity for the Piccadilly line at Rayners Lane. In order to do this LUL would have had to invoke the Rayners Lane Specified Right⁸ within the PPP contract.

An option for a major layout change at Rayners Lane was included as a Specified Right in the Metronet PPP contract. This would have enhanced the station to have 4 platforms (two island platforms) with improved interchange and reversing capability. Piccadilly line trains would serve the central platforms and Metropolitan line trains the outside platforms, giving an opportunity to provide RVAR compliance and step-free cross-platform interchange between stock types. The project would also have facilitated enhanced frequencies on both Piccadilly and Metropolitan services on the Uxbridge branch – although terminating all Piccadilly line trains at Rayners Lane was not assumed.

Analysis was undertaken to invoke the Specified Right, which was estimated to have a capital cost of approximately £55million. Due to funding constraints the proposal did not receive assent to progress. Subsequently, a reduced proposal for Rayners Lane remained in scope, which solely prepared the current layout for the introduction of the S8 trains.

At the time of the last S8 exemption application, it was felt that there were two other aspects of TfL's Transforming the Tube programme might have provided an opportunity to deliver level access on this branch. These were the S Stock re signalling project which was awarded in July 2010 and the Piccadilly Line Upgrade and Public Private Partnership (PPP) Restated Terms process. Period 2 contracts were due to be signed in 2010 and pertained in part to the signalling used on that line.

To take account of these uncertainties, LUL requested a temporary exemption until 31 August 2013, for platforms at Hillingdon, Rayners Lane, Ruislip and Uxbridge.

The result of these elements is that the Piccadilly line trains are being fitted with the 'same' on board signalling equipment and controlled by the 'same' moving block Bombardier in cab Communications-Based Train Control (CBTC)⁹ Signalling System wherever S 8's and S 7's run with 73Tube Stock. This means

⁸ Specified Right – this is a clause within the Public Private Partnership (PPP) contract relating to a project or piece of work that LUL may wish to have undertaken in the future, but for which the Infraco was not obliged to give a price at the time of signing the contract. The Infraco will not be paid for the Specified Right until LUL decides that the work should be undertaken – at which point the Infraco are obliged to undertake the work as set out in the Specified Right attached to the contract.

⁹In the modern CBTC systems the trains continuously calculate and communicate their status via radio to the wayside equipment distributed along the line. It also enables the wayside equipment to define the points on the line that must never be passed by other trains on the same track. The CBTC system allows the reduction of the safe distance between two consecutive trains.

that the Subsurface and Tube rolling stocks will run in complete compatibility, however, this does not provide any opportunity to address the step and gap without any stock segregation because of the need for compromise height of the platforms.

LUL is happy to share the contents of the Frankhams Consultancy Group Report and the 'West London Study' with the DfT if required.

Applicable disciplines within LUL, including Rolling Stock, Civil, Premises, Human Factors, Track and Systems Safety Engineering have since undertaken a process to identify and review the options for achieving compliance with the RVAR for the S Stock on the Uxbridge branch of the Metropolitan Line. This review was undertaken to identify the feasibility and practicability of all identified options, and review the change in safety risk and potential disbenefits that each option would entail.

Twenty six options and sub-options were identified and reviewed. Manual Boarding ramps were not assessed as the required information was not available at the time.

Some options were discounted on the basis that similar identified options offered greater benefits (or less disbenefits) for similar effort or cost. Some were discounted as not providing the ability to comply for the S Stock, these included the suggestion of creating a new Compromise Height (LUL) which is halfway between the floor height of the S Stock and 73TS: this option would give a step up of 141mm for the S Stock and a step down of 141mm for the 73TS, meaning RVAR compliance was still not achievable for either stock.

Further options were discounted as being unfeasible at this time. These included revisiting the possibility of stock segregation, Train-Bourne and platform based lifting devices, Platform extensions, Door cut out and platform separation at Uxbridge.

Stock Segregation

This was considered in terms of either the Piccadilly line terminating at an earlier station to prevent the trains from entering the relevant platforms, or the service would not stop at the relevant platforms. This would then allow the platforms to be adjusted along the full length to the height required for the S Stock.

It was noted that, due to constraints on other parts of the network, there would be no change to the number of trains per hour provided on the alternate line. Therefore, additional S Stock trains could not be provided to ensure the same level of service is achieved.

As identified in the West London Future Services Study, removing the Piccadilly line service along the Uxbridge branch would have social and economic effects on the Uxbridge Branch area. However, stopping the Piccadilly Line at Rayners lane or Ruislip is expected to have greater disbenefits than running non-stop to Uxbridge. Accessibility and risks associated with boarding and alighting from

trains due to step heights would still be present at the station both stocks continue to use. It is considered that, as these options would require additional occurrences of passenger moving from train to platforms, to change between lines, such risks would increase.

The options to shorten the Piccadilly line by stopping at Rayners Lane or Ruislip would also require major infrastructure changes to allow reversing of services, as currently the capacity of these stations is not sufficient. These options would also affect the running of trains on the whole branch from Acton Town as higher dwell times and reversing delays would result in a less frequent service.

Train-Bourne and platform based lifting devices

There are no such designs or solutions currently in used on the LUL network and no designs currently being worked on.

It was noted that any lifting device design fitted to the train or the platform would be required to overcome a number of disbenefits. These include reliability issues, such that failure of the device may lead to non-availability of access and delayed, or cancelled, trains. Additional hazards would also be present to passengers on the platform, as well as to the train itself (e.g. collision and derailment), as the system would be expected to move out of / into the train gauge. The use of extending ramps or lifting devices is expected to increase the dwell time when used.

The costs of both developing these options, undertaking the modification to the trains and the platforms, and the disbenefits identified mean that these options were discounted.

LUL has previously employed an independent external company, Creative Design, to undertake a detailed study of active, platform-based, mechanical gap fillers and create potential concept designs. For example a metal structure which is built into the platform and automatically deploys when the train stops.

This study found that there is no appropriate 'off the shelf' solution currently available. Discussions based on this study within LUL at the time concluded that, although a potential solution could be developed, it would take a significant length of time, as we would need to further investigate the potentially significant impacts on safety, our ability to incorporate such devices into existing platform structures, operational systems and passenger behaviour etc. Concerns were also raised about the negative impact on dwell times, as it was estimated that the additional time needed for any such device to be deployed and retracted safely could be significant.

LUL is happy to share the contents of the Creative Design Report with DfT if required.

Platform extensions

This option was based on the idea that changing the location where the trains stop in relation to each other would mean that 73TS doors would never open onto the RVAR humps of the S Stock. Therefore changes to the platform height to achieve RVAR compliance at wheelchair accessible doorways could be undertaken without affecting the other stock.

In order to do this, the stopping position of the 73TS would need to be at least half the length of an S Stock away from the S Stock stopping position. This would ensure that no 73TS doors open at the S Stock wheelchair accessible doorways, which are located at the centre of the train. Therefore, this option would require extension of all identified platforms by at least 70m.

This extension would entail major restructuring of the station infrastructure covering all assets (platforms, access, signalling, track etc) and would not be feasible for some platforms due to physical space constraints. Other disbenefits include the additional access time required for passengers to walk to the train stopping position on the longer platform, and passenger confusion over where to board which line.

Door cut out on 73TS

An option was identified such that RVAR humps could be provided and the Door Cut-out function used to prevent customers from boarding or alighting where the gap is at its greatest, therefore allowing platform adjustment without increasing risks due to large steps. This function ensures specified doors do not open at specified stations, and may be automatic or manually operated by the Train Operator (T/Op).

An S Stock RVAR platform hump would cover four doors of the 73TS. This is equivalent to all the doors on one 73TS car. It was noted that, where the stopping positions are the same for both stock, and at all identified stations, the hump would not affect a whole car but will leave at least one door free, thus affecting a single door of a second car. Therefore, if the affected doors were cut-out, passengers will be able to enter / leave the train by at least one door. However, this would be the smaller door at the front / back of the car.

The doors affected by this option would lie in the centre of the 73TS, and therefore a modification to the train system would be needed. The exact doors would depend on the station and will not be the same each time. There is further complication that the Piccadilly line trains travel through the Heathrow Loop, and thus are not always facing in the same direction. Therefore, a choice of two sets of doors would be required based on the direction the train is facing.

The modification to an existing stock to add a complex door control system is expected to be prohibitively costly. Due to this, and with the added passenger confusion, possible reliability issues with a manual system for choosing a complex and changing set of correct doors and the increase in dwell time, this option was also discounted from the assessment.

Platform separation at Uxbridge

An option was identified relating specifically to Uxbridge Station. Uxbridge has 3 tracks but 4 platforms; the centre track being accessible by both Platform 2 and 3. Currently Platform 2 is not used but is usable. It was proposed that specific platforms could be used for specific stocks and the platform heights adjusted accordingly. This would mean full RVAR compliance for the S Stock with the reduction of available platforms from 3 to 2 for each stock.

This was not considered to be feasible as reducing the available number of platforms would reduce the flexibility at Uxbridge, such that delays and reduction in service would be caused.

Options Considered Feasible

Where Options were identified as being feasible and practicable, a hazard assessment was undertaken to identify the expected changes in risk to passengers and a final conclusion was made as the way forward.

Three options were identified as feasible and practicable. These were:

- Raise full length of platform height to zero step height for S Stock
- Raise platform height to zero step height for S Stock at wheelchair accessible doors (Humps).
- Do Nothing.

These were then reviewed to identify and assess changes in risks due to their implementation considering things such as falls and trips onto and out of the train and head strike (when stepping down in the 73TS).

Changing the platform to achieve level access for the S Stock would increase the step down onto the 73TS to 283mm. This is expected to be a much greater hazard to a range of passengers, including mobility impaired persons, visually impaired persons, children and those accompanying them and people with suitcases or baggage, than the current platform heights. It is noted that in many cases, those encumbered, with children in pushchairs or with large baggage attempt to board / alight the train backwards and are therefore unlikely to see the step and react to it. If they are not expecting such a large step they may trip and fall into or out of the train.

The step for the 73TS would be increased from 173mm to 283mm, more than a 60% increase in the height of the current step, which is already considered large. The current worst case step for the 73TS is 266mm (at North Ealing). Therefore, with these options, the platforms on the Uxbridge branch would be modified to have the worst case step on the Piccadilly Line.

It is noted that at Wembley Park on the Metropolitan line a vertical step of 175mm for the S Stock at the front and rear of the train was corrected to step-free when the A Stock was decommissioned. This was due to it being assessed as being too large for mobility impaired customers.

However, with the S Stock the step will be reduced from 110mm to 0mm. The current height is well within the requirements of the regulations, and therefore the

reduction in risk, although a benefit was considered to be significantly less than the increase in disbenefits to the Piccadilly Line passengers.

For an RVAR Hump design, not all doors would be affected and therefore not all the passengers on the train would experience a change in risk. However, the platform would change in height from door to door along the train. This change in height may increase the likelihood of a trip or fall for passengers, especially commuters who are more likely to be expecting the platform to be at its compromised height. This would also include a transition ramp between the compromise height platform and the RVAR hump which may fall directly in front of the 73TS doors (including the single leaf doors). As with the differing heights of the platform, passengers are unlikely to be expecting a sloping surface to step out onto, and although the surface is expected to be designed and built to LUL standards, this may increase slips and falls at these areas.

Head strike was a hazard identified for passengers concentrating on the step down into the Tube Stock: if they do not recognise the reduced height they may strike their head on the top of the door opening. The height of the top of door from the platform for the 73TS, when the platform is at S Stock RVAR height is 1670mm. This height (when including shoes) represents the 34th percentile of adults stature. Therefore, 66% of adults could hit their heads.

However, the door design of the 73TS is such that the curvature of the door (bottom to top) extended towards the centre of the car body, when stepping into the train, passengers step down and then into the train prior to hitting head on top of doorway. This should reduce the likelihood of head strikes, although the risk will still be increased with reduced height doorways.

The increased risks at the platform edge, if the platform was raised to the zero step height for S Stock, were not considered tolerable due to the unacceptable step height that would be created for the 73TS.

It was therefore concluded that the option to leave the platform at their current height was the most feasible, practicable and did not increase the risks to our customers. However, this does not enable us to achieve RVAR compliance. Therefore LUL is requested temporary exemptions to allow us to investigate the use of manual boarding ramps as part of business as usual.

Manual Boarding Ramps

LUL did consider the use of manual boarding ramps at Uxbridge station prior to the last exemption application as it is a terminus station with existing step-free access. It was thought that its location at the western end of the Metropolitan line may offer potentially longer dwell times and less crowded platforms which could be suitable for ramps. However, this option was ruled out due to a combination of factors:

The platforms can be very crowded and it was felt that it would be unsuitable and potentially unsafe to deploy ramps. It was felt that it would not be appropriate to put restrictions on the times of day when ramps could or could not be deployed

and that if they were to be used, ramps should be consistently available at all times of the day.

The use of a ramp at Uxbridge could have given people a false impression and expectations of their use at other stations on the Metropolitan line and network as a whole. This inconsistency might have led to confusion and additional stress if disabled passengers were able to board the train at Uxbridge using a ramp but then find they were unable to alight at their desired destination where ramps would not be available.

The change in roles, responsibilities and additional training necessary for LUL staff at Uxbridge station and within their wider station group to safely operate the manual boarding ramps would have had a significant impact on our staffing levels and costs as well as severely limiting staff flexibility.

Manual Boarding Ramps were in direct conflict with the LUL approach of providing permanent physical improvement works and structures which give reliable, independent 'turn up and go' access. It was felt that the only way to avoid the need for customers to book in advance and maintain the 'turn up and go' service at Uxbridge would be to place an additional member or members of staff on the platforms at all times to ensure current services are also maintained.

However, since making the previous exemption application, LUL has trialled the use of ramps at 16 stations during the Olympic & Paralympic Games. This service was well-received by both customers and staff, with no significant issues or incidents reported. As a result of this success, LUL retained the ramps in use at the 16 locations, and the opportunities for their continued use were evaluated.

The demand for our service during the Olympics and Paralympics, and the service we supplied in response, was considerably different from that during 'normal operations'. Differences were seen in customer numbers and distribution throughout the traffic day, types of journeys being made, popular destinations and our service frequency and staffing models. The focus of the evaluation was on whether we can provide a ramp service during normal operations that is consistently acceptable both to our customers using it and operationally. This evaluation is now complete and the decision has been made to roll out the use of manual boarding ramps on London Underground.

Further to this, untimed exemptions are requested for Rayners Lane platforms 1 and 2, which are not at existing or planned step free stations. The S8 does not terminate at these stations and as ramps are not to be used down into trains, they would not provide a means of interchanging between Metropolitan and Piccadilly lines. Therefore an exemption is requested until such time as a solution is found which would provide level access to the Piccadilly line or until such time as step free access to the platforms is achieved.

Annex B: Compromise Height Platforms (LUL) on the Metropolitan line

Station	Platform No.	Platform Type	Step Free Station Status	Exemption Duration Requested/ <u>in place</u>
Eastcote	1	Compromise Height (LUL) and curved	No Step free or useful interchange	<u>Untimed***</u>
Eastcote	2	Compromise Height (LUL)	No Step free or useful interchange	<u>Untimed***</u>
Finchley Road	1	Severely Curved & Comp Height (LUL)	Interchange only	<u>Untimed *</u>
Finchley Road	4	Severely Curved & Comp Height (LUL)	Interchange only	<u>Untimed *</u>
Hillingdon	1	Compromise Height (LUL)	Current	31 August 2014**
Hillingdon	2	Compromise Height (LUL)	Current	31 August 2014**
Ickenham	1	Compromise Height (LUL) and curved	No Step free or useful interchange	<u>Untimed***</u>
Ickenham	2	Compromise Height (LUL) and curved	No Step free or useful interchange	<u>Untimed***</u>
Rayners Lane	1	Compromise Height (LUL)	No Step free or useful interchange	Untimed***
Rayners Lane	2	Compromise Height (LUL)	Interchange only (last opportunity to interchange southbound)	Untimed***
Ruislip	1	Compromise Height (LUL)	No Step free or useful interchange	<u>Untimed***</u>
Ruislip	2	Compromise Height (LUL)	Current	31 August 2014**
Ruislip Manor	1	Compromise Height (LUL)	No Step free or useful interchange	<u>Untimed***</u>
Ruislip Manor	2	Compromise Height (LUL)	No Step free or useful interchange	<u>Untimed***</u>
Wembley Park	5	Compromise Height (LUL)	Current	Works Complete
Wembley Park	2	Compromise Height (LUL) & Curved	Current	Works Complete
Uxbridge	1	Comp Height (LUL) & Severely Curved	Current	31 August 2014**
Uxbridge	2	Compromise Height (LUL)	Current	31 August 2014**
Uxbridge	3	Compromise Height (LUL)	Current	31 August 2014**
Uxbridge	4	Comp Height (LUL) & Severely Curved	Current	31 August 2014**

*Temporary exemption until such time as an appropriate solution is identified for severely curved platforms

** Temporary exemption requested to allow further investigation into the use of Manual Boarding Ramps on LU.

***Temporary exemption in place until there is step free access.

26 April 2013

Dear John

The London Underground (LU) proposal to extend the existing exemption for Metropolitan Line S8 trains does not affect ORR's ability to enforce against accessibility legislation, nor does it introduce additional safety risks to the network.

ORR has comments to make about a number of matters arising from the LU justification for the extension of the exemption.

1. All stations covered by the application

The nine platforms in this application are the only platforms in the original exemption (SI 2010 No. 435) with an expiry date of 31 August 2013. Will LU be carrying out the same exercise for the sixteen other platforms in table 1 of the exemption as their expiry date approaches? The submission of this application does not give confidence that LU is making every effort to achieve legal compliance at these locations.

2. Uxbridge

LU provides a number of reasons for not complying with the RVAR requirement for wheelchair boarding ramps at Uxbridge station. ORR does not consider that these provide a basis for extending the exemption at this location. Since the original exemption application LU has deployed wheelchair boarding ramps at a number of stations across the network and has not made a case in this paper for not doing the same at Uxbridge. Considering the bases for the LU argument:

- The impact of deploying ramps on the safety of staff and passengers: LU has not explained why the risks at Uxbridge are markedly higher than those at other locations where ramps are in use.
- Narrow platforms with a high density of users: Uxbridge station does not have narrow platforms, nor is it exceptionally busy. It is a terminal station, so deployment of the ramp can take place after the passengers have alighted from the incoming train. The wheelchair accessible doorways are at the centre of the train; passengers boarding at Uxbridge will tend to board at the end of the train nearest to the ticket gateline so there is unlikely to be severe congestion at the wheelchair boarding points. Congestion is only likely to arise at times of significant service disruption, in which case operational rules can be applied in the same way that they are regularly applied to manage congestion at stations such as Victoria.
- Potential impact on dwell times: Uxbridge is a terminal station, which means that the pressures of dwell times are markedly less than at stations with through platforms. Usually trains arrive with a margin of recovery time before being required to return to service, and even when running late such that this margin no longer exists the turn-round time is defined by the time taken for the driver to walk the length of the train and place the driving cab in service. This is significantly longer than the dwell time expected for through platforms.

- Ramps do not offer an appropriate solution to all passengers: RVAR specifically requires provision to be made for wheelchair users where there are excessive stepping distances. LU is using ramps at other locations on the network, and says that it is evaluating opportunities for their continued use. ORR acknowledges that it is preferable to achieve the defined stepping distances, but until this is achieved compliance with the relevant provisions of RVAR is required
- It will be necessary to provide staff: This is an aspect of RVAR that affects all railway undertakings with excessive stepping distances and has already been accepted by parliament as being part of the cost of introducing this legislation. LU has not explained why its staffing costs should be disproportionate at Uxbridge compared with other stations on the network where ramps are used, or compared with other UK rail operators.
- Giving passengers a false expectation of the degree of accessibility they would find further on in their journey: A boarding aid deployed by a member of staff as required by the regulations provides an opportunity for that member of staff to take a moment to ascertain the route the wheelchair user proposes taking and to ensure that it will be step free end to end. The argument that accessibility improvements should not be made at one location because there is not the same level of accessibility at other locations on the network is an argument for stasis, and does not reflect LU's strategy elsewhere in making non-statutory improvements when they become economically viable and align with station upgrade work.

3. Rayners Lane

London Underground refers to future plans to make Rayners Lane step free taking into account infrastructure constraints such as severe curvature. By this stage of the process, with an original exemption expiry date of August 2013, it would be expected that LU would have assessed Rayners Lane for infrastructure constraints. The reference to the potential for severe curvature at this location with straight platforms does not give confidence that LU has carried out even a minimal assessment of its options for the site. ORR acknowledges that there are other factors at Rayners Lane that will influence the time scale for making the station step-free.

Regards,

Giles

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10 June 2013

Dear John

Extensions to exemptions from requirements of RVAR that facilitate access for wheelchair users to Metropolitan Line trains on the Uxbridge branch

Thank you for your request – I have asked DPTAC to consider London Underground's application.

DPTAC support the extensions at Ruislip Platform 2 and Rayners Lane until step-free access to the full station (or level access to the Piccadilly Line) are available. However, DPTAC does not support the extensions for Uxbridge and Hillingdon where the use of manual boarding ramps would seem to be an effective solution and there appears to be the opportunity for these to be made available with minimal delay.

DPTAC also support the use of use of the negative resolution procedure.

Yours sincerely,

Phil Pool
Secretary DPTAC