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Exemption Application – London Underground – Circle, District and Hammersmith & City Lines S7 Vehicles

DPTAC thank London Underground (LU) for consulting DPTAC on the Exemption application for the Circle, District and Hammersmith & City Line S7 vehicles. DPTAC acknowledge the huge amount of work that has been put in by LU in partnership with the Department for Transport (DfT). We also congratulate LU on the very small number of exemptions that we have to comment on.

Regulation 4(3) (b) – Audible Door Closure Warnings: DPTAC are willing to accept an exemption until 30th May 2015 on the basis that LU keep DPTAC informed of the results of the Victoria Line audible and visual warning trials. In doing this, DPTAC request that LU factor multiple solutions into the trial, including signals of varying lengths (above the current 1.75 seconds and below the required 3 seconds).

Regulation 5(2) – Visual Door Warning Indicators: As above, we are willing to accept this exemption until the 30th of May 2015 and will revisit our position after the results of the Victoria Line trials are released.

Regulation 13(4) – Announcements at Stations: DPTAC are willing to accept this exemption, providing LU do not use the extra time for standard announcements regarding security or LU advertising. We would also welcome LU considering alternative orders for announcements, such as the current station being announced immediately before the doors are opened. It is also crucial that the destination of the train is stated in any audio announcements.

Regulation 23(1) – Boarding devices: Whilst DPTAC fully understand LU's reasoning behind asking for this exemption, we have concerns for a number of reasons and will be recommending a time limited exemption. Our concerns are as follows:

1. Even if a booking system is not in place, the absence of an on-train ramp for both casual and emergency provision would seem to be short-sighted.
2. Many disabled people do not see the need to pre-book their travel and we believe that non-provision of any ramps at stations would, in the long-term, cause greater difficulty for LU by way of extended dwell times than skeleton provision of ramps would. Anecdotally, LU users who are blind and partially sighted are complimentary to ad hoc assistance provision, and it would make sense to use the same system for reduced mobility passengers, especially at stations which are step-free from pavement to platform.
3. Whilst DPTAC understand that LU do not wish to have ramps on every platform, we believe they should consider having a ramp available for the same ad hoc assistance provision that is currently used for passengers who are blind and partially sighted.
4. DPTAC would strongly recommend that a ramp is available in a cupboard on all accessible stations in case of emergencies.

Regarding the stations that will be deferred until March 2016, DPTAC appreciate the financial constraints LU are under. Provided the Department are satisfied that there are appropriate procedures in place to assist disabled people in the event of trains terminating at inaccessible stations, DPTAC are willing to accept the deferral.

Considering the previous Exemptions granted to the Metropolitan Line S8 vehicles, DPTAC agree that it is appropriate to use the negative resolution procedure.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'T Jones', with a stylized flourish above the first name.

Tomi Jones
Deputy Chair
DPTAC