Design Standards for Accessible Railway Stations: Code of Practice

About you

Q1. Are you responding:

on behalf of an organisation

Step-free access

Q2. In your experience, are current standards and guidance relating to maximum gradients suitable or not suitable for current railway station use?

No, they are not suitable

Why?
The use of ramps for boarding trains should be avoided in favour of portable manual lifts whenever possible; flat access onto trains either by higher platforms or Harrington Humps should always be the preferred option. Where ramps are used, they should have an upper gradient limit of 6 degrees (1 in 10). Many motorised wheelchairs specify this maximum gradient. Even with manual wheelchairs, a greater incline puts a strain on assistants, particularly with heavier ones, and also risk of injury with loss of control.

Q3. In your experience, are current standards and guidance relating to lift provisions suitable or not suitable for current railway station use?

No, they are not suitable

Why?
Procedures for breakdown should be identified - particularly at unmanned stations. All lift breakdowns should be classed as emergencies with urgent identified contractors appointed (this should also apply for disabled toilets - see response to Q27).

Doors, lighting and floors

Q4. How does your organisation take into account the effect of lighting and materials regarding glare and reflections (providing details of what, if any, guidance or standards are used)?

N/A

Tactile wayfinding

Q5. With regard to tactile wayfinding, what changes, if any, would you suggest to:

standards and guidance	Braille should be provided on all signs, not just on those provided "where visually impaired people need them to be able to identify and use facilities at stations"
training	Training of all customer-facing staff should be carried out as in Y1; this should include emphasis on the needs of passengers with sight and hearing loss

Set-down and pick-up points

Q6. Are the current standards relating to:

	Yes, they are appropriate	No, they are not appropriate	Don't know
set-down points appropriate or not appropriate for current use?	X		
pick up points appropriate or not appropriate for current use?	X		

Why?
They appear to be appropriate

Dispensations

Q7. Are you clear on the difference between dispensations and derogations?

No

Why?
Although these are set out in Annex IV, we suspect that operators are often unclear on the difference between these and whether a dispensation is actually needed. Clearer guidance should be provided. For example: "Inability to comply with the recommended good practice does not require a dispensation, so long as the required standard is met." Who decides whether the standard has been met?

Q8. Is the current framework on setting requirements including:

	sufficiently clear	appropriate for use
monitoring:	No	No
enforcement:	No	No
the dispensation process:	No	No

Why?
We feel that this whole section needs reviewing and rewriting.

Q9. Have you ever applied for a dispensation?

No

Car parking

Q25. Do you think that the current standards and guidance provide a sufficient number of accessible car parking spaces at railway stations?

Yes

Why?
They appear to provide sufficient accessible spaces

Q26. Do you think that there should or should not be a mandatory standard relating to the provision of accessible electric vehicle charging bays?

Yes, there should be

Why?
There needs to be flexibility as electric vehicle charging provision varies considerably around the country. If charging is available in the car park, then at least one of the bays should be accessible.

Toilets

Q27. Are the current standards and guidance in this section appropriate or not appropriate for current use (including the provision of changing places facilities)?

Some are appropriate, some are not appropriate

Why?
Toilets should be provided on all platforms; passengers with disabilities and/or requiring assistance should not have to move to another platform to access these. It is clear that the standards need updating to refer to changing places toilets. These should be provided if possible whenever toilets are being upgraded or redesigned. An emergency assistance alarm system should be provided in all accessible and changing places toilets. All breakdowns should be treated as emergencies and urgent identified contractors appointed.

Crossing the track

Q28. Are the current standards and guidance in this section appropriate or not appropriate for current use?

Some are appropriate, some are not appropriate

Why?
Barrow crossings often provide the only way of crossing the track for anyone with a disability. They should not be removed until safe alternative crossings complying with the Code of Practice have been provided.

Wayfinding

Q29. With regard to tactile wayfinding, are the following appropriate or not appropriate for current use?

	Yes	No	Don't know
Standards and guidance		X	
Training		X	

Why?
Tactile wayfinding should be provided throughout the passenger's journey, from approaching the station to progressing through it and moving between platforms. Tactile surfaces for the visually impaired should be provided on the edges of all station platforms and at any other points where there is a change in level. All steps and obstructions should be removed as far as possible – especially when changes to buildings are being considered.

Training: see our response to question 5

Q30. In your view, do the current standards and guidance relating to tactile wayfinding provide the right level of accessibility for disabled people?

No

Why?
See our response to questions 5 and 29

Footbridges

Q31. Do you think that all footbridges should be:

not covered in some circumstances

Why?
All footbridges should be covered where feasible, with the possible exception of small, unstaffed stations, but see also reply to question 33

Footbridge circumstances

Q32. Which circumstances?

See reply to question 31

Step free access

Q34. Do you think that current standards and guidance relating to lift provision provide the right level of accessibility for all passengers?

Yes

Why?
It is very important that these standards are adhered to – especially when the ramps do not conform to modern standards (see also our response to Q2 and Q3).

Signage

Q35. In your view do the current standards relating to signage provide the right level of accessibility for disabled people?

No

Why?
Clear signage to all facilities (toilets, ticket offices, help points, platforms, lifts and station exits) should always be provided. Braille should be included on all signs, not just on those provided "where visually impaired people need them to be able to identify and use facilities at stations"

Additional technology

> **Q36. How, in your view, might mobile applications and other digital technology be used to support the passenger travel experience for disabled people (including examples)?**
>
> A wayfinding app for navigating all stations should be introduced – replacing separate apps developed by operators, always remembering that for some people, digital technology might not be a feasible option, therefore non-digital systems must also be available. Passengers who have booked assistance should be provided with a mobile telephone number they can contact at their starting and finishing stations and any interchange stations on their journey.

Additional commentary on the Code of Practice

> **Provide, if any, further commentary on any of the sections in the Code of Practice: Design Standards for Accessible Railway Stations specifying the section or sections where relevant.**
>
> B1. Substitute transport pre-planned and emergency
> The guidance may need updating to reflect more recent policy changes. We feel that the advice at B1e needs to be emphasised and that regular reminders should be provided to operators.
> N1 Ticket Sales Points
> There is no reference to a meeting point for passengers using assisted travel. This is especially important at times when the booking office is closed or at unstaffed stations.
> Please see also our press release, which emphasises the importance of ticket offices for travellers with accessibility needs https://www.railfuture.org.uk/Press-Release-29th-October-2023

Final comments

> **Q37. Any other comments?**
>
> General Comments
> The code itself is very long and requires reference to a lot of detailed, technical documents. It needs re-structuring to make it more accessible. We suggest that the European Standards and National Standards texts are removed from the main text and made into two annexes. This would shorten the main document considerably and make it more digestable and encourage operators to focus on the code's requirements.
>
> Advisory affected user groups should be commissioned at all stages from design, to sign off of a project after completion. A recent example was the accessibility group set up by Network Rail for the Hope Valley Improvement Scheme, where users were fully involved.
>
> There is also no reference to passengers using assisted travel, yet the majority of these will be people with disabilities. This needs to be added in various sections, including N1 (question 37 refers) and Y1.