



**Comments from Imtac Consultation on
Proposed Changes to Rail Vehicle Accessibility
Regulations & Rail Vehicle Accessibility
(Applications for Exemption Orders)
Regulations 2013**

March 2013

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Comments on the proposals

Imtac welcomes the opportunity to comment on the current consultation around proposed changes to the current Rail Vehicle Accessibility Regulations in Northern Ireland. The Committee has previously been involved in discussions both a local and national level around the impact of European Regulation on our national accessibility standards. Imtac is content that the changes involved do not dilute existing standards and will in some circumstances improve current standards. For this reason Imtac is broadly supportive of the proposed changes to RVAR in Northern Ireland.

The Committee welcomes the proposal to include the end date of 2020 for rail vehicles to be compliant with accessibility regulations. Imtac also supports the proposals for refurbishment of non-compliant vehicles, certification and enforcement.

In regard to proposals for exemptions Imtac recognises that for operators of heritage railways this may be required. However the Committee believes strongly that all rolling stock operating routine services on the main rail network, including cross-border Enterprise services, should be compliant by the 2020 end date. Operators of heritage railways should be required to provide additional evidence of measures taken to make their services inclusive and accessible (other than running compliant vehicles). This could include modifications to rolling stock and infrastructure to make it more accessible, providing accessible information about services and training staff and volunteers to provide a better service for older people and disabled people. Where operators are introducing replica vehicles Imtac believes that these vehicles must be made fully compliant with the Regulations. Imtac strongly supports the proposal for consultation with disabled people and their organisations around future applications for exemption from the Regulations. We would expect that Imtac will be a key stakeholder in these consultations.

Imtac has twice worked with Translink in the past during the procurement of new rolling stock. Whilst accessibility standards must be met through procurement they do represent minimum standards. The benefit of consultation with disabled people and their organisations in the early stages of the procurement process can mean improvements can be achieved beyond minimum standards. This can involve something as simple as a consistent

approach to the location of the button to open doors on the train. Often small changes to the design of vehicles (based on the experiences of users of existing vehicles) can make journeys more straightforward for disabled people. Imtac recommends that the Department require all operators undertaking procurement of new trains to consult with disabled people and their organisations. This requirement should also apply to operators seeking to refurbish existing rolling stock. As before Imtac would expect to be a key stakeholder in these consultations.

Conclusion

Imtac would like to thank the Department for the opportunity to comment on the current proposals. The Committee is broadly supportive of the proposed changes to the legislation. We look forward to working closely with the Department and others as improvements and investments are made in infrastructure and rolling stock which further improve the accessibility of our rail network.