

**THE RAIL VEHICLE ACCESSIBILITY (NON-INTEROPERABLE RAIL SYSTEM)
(LONDON UNDERGROUND CIRCLE, DISTRICT AND HAMMERSMITH & CITY
LINES S7 VEHICLES) EXEMPTION ORDER 2018**

**THE RAIL VEHICLE ACCESSIBILITY (NON-INTEROPERABLE RAIL SYSTEM)
(LONDON UNDERGROUND METROPOLITAN LINE S8 VEHICLES) EXEMPTION
ORDER 2018**

Explanatory Note

What do the Orders do?

1. The Orders exempt the vehicles operated by London Underground Limited (LUL) on the Circle, District and Hammersmith & City lines known as 'S7' and vehicles operated on the Metropolitan line known as 'S8' from the requirement to meet standards set out in the Schedule to the Rail Vehicle Accessibility (Non-Interoperable Rail System) Regulations 2010 (RVAR) for announcements relating to the next station stop, made while the vehicle is stationary in a platform.
2. The exemption from 'next station' announcements applies for the life of the S7 and S8 fleet. 'Next station' information must still be provided between departure from a station and arrival at the next station.
3. A copy of the application form can be found at Annex A.

Why have the Orders been made?

RVAR standard:

4. Para 11(5) of Schedule 1 to RVAR 2010 requires that whilst a rail vehicle is stationary at a station or stop any public address systems required to be fitted inside the vehicle, and on its exterior, must be used to announce the destination of the vehicle or, if it is following a circular route, the name or number of the route and, in the case of systems inside the vehicle only, to announce the next stop.
5. The existing passenger information system fitted to both S7 and S8 announces the next stop between stations, and where there is a branch line or the service is a semi-fast or fast service, the next stop is announced whilst the vehicle is stationary in the platform. LUL has requested that for routes where the next stop is fixed, an announcement of the next stop, whilst in platform at the preceding station, is not required to be given. Stations on the District line are, in some locations, situated closely together often with no more than a few minutes of travelling time between stations. This type of metro service offers limited time in which to make necessary passenger information available and provide other useful information such as available interchanges, safety information (such as 'mind the gap') or information on key local destinations. LUL considers that providing an additional repetition of 'next station' information could increase dwell times.
6. The Orders have been granted to allow LUL to streamline the information provided to passengers whilst stationary in a platform and focus on the name of the current station, the end destination and any interchange or safety information.

The next station information is then provided between stations and not when the train is stationary in the platform. This exemption does not apply where there are branch lines e.g. to the west of Gloucester Road station or there are fast or semi-fast services e.g. on the Metropolitan line towards Amersham and Watford from Baker Street.

7. LUL has previously been granted timed exemptions from this requirement for the S7 (in 2012) and S8 stock (in 2010), which have now lapsed. These exemptions will apply for the life of the S7 and S8 vehicles in respect of para 11(5) of RVAR.
8. Evergreen exemptions against this standard have been granted for vehicles operated on the Victoria and Northern lines. These exemptions have been granted on the grounds that the type of service LUL operates – high frequency, with short dwell times and next station information is provided in advance of arrival at stations and available on platforms and network maps (both on station platforms and inside trains). Making an additional announcement can also reduce the capacity during dwell times to make announcements about interchange opportunities, safety information and local key destination information e.g. ‘Alight here for Moorfields Eye Hospital’

Are there any conditions for the operator to meet during the period of exemption?

9. The exemptions in relation to the requirement set out in paragraph 11(5) only apply to trains that are stationary at station named in the Schedules to the Orders, at the indicated platforms. In addition as a condition of the exemption whilst the train is stationary at those station platforms, the internal passenger information system must still be used to announce which line the train is travelling on and at least one of the following items of information—
 - the destination of the vehicle;
 - the next stop.

Whichever of these items (destination or next stop) is not announced at the station must then be announced before the train arrives at the next station.

Why has the exemption been made without a Statutory Instrument being laid before Parliament?

10. Following amendment of section 183 of the Equality Act 2010 by the Deregulation Act 2015, exemptions can now be made by administrative orders, rather than by statutory instruments. The Orders will, however, be notified to Parliament in the Annual Report which the Secretary of State is required to lay before Parliament by section 185 of the Equality Act.

Who has been consulted and what did they say?

10. We consulted the Disabled Persons Transport Advisory Committee (DPTAC), the Office of Rail and Road and London Travelwatch on the exemption request, as well as carrying out a period of public consultation via our website.

11. Consultation responses can be found at Annex B.

Is there an impact assessment?

12.. An impact assessment is not required for a deregulatory measure applied to a public sector body.

Contact

13. Julia Christie at the Department of Transport: Tel: 07920 504300 or e-mail: julia.christie@dft.gsi.gov.uk can answer any queries regarding the order.

Annex A – Application form

1 Full name of applicant and address

London Underground Limited,
Windsor House,
42-50 Victoria Street,
London
SW1H 0TL

2 Description of Rail Vehicles

Circle, District and Hammersmith & City line ‘S7 Stock’

Train Formation: 133 x 7 Car permanent formations Train Numbers:

Driving Motor Cars: 21301 – 21566

Non Driving Motor Cars M1: 22301 – 22566

Non Driving Motor Cars M2: 23388 – 23566 (even numbers)

Non Driving Motor Cars MS2: 24301 – 24566

Non Driving Motor Cars de-icing: 25302 – 25386 (even numbers)

Metropolitan line ‘S8 Stock’

Train Formation: 58 x 8 Car permanent formations Train Numbers:

Driving Motor Cars: 21001 – 21116

Non Driving Motor Car M1: 22001 – 22116

Non Driving Motor Car M2: 23057 – 23116

23001 – 23055 (odd numbers only)

Non Driving Motor Car: 24001 – 24116

Non Driving Motor Cars de-icing: 25002 – 25056 (even numbers)

3 Circumstances in which exemptions are to apply

At all times in passenger service

4 Relevant requirements from which exemption is sought

S7 and S8 Stock:

Schedule 1, Part 1 (General Requirements): Paragraph 11 (5) in relation to S7 and S8: Announcements at stations.

11 (5) Whilst a rail vehicle is stationary at a station or stop any public address systems required to be fitted inside the vehicle, and on its exterior, must be used to announce the destination of the vehicle or, if it is following a circular route, the name or number of the route and, in the case of systems inside the vehicle only, to announce the next stop.

5 Background

London Underground previously submitted exemption requests against the clause above, however this has since lapsed. The timed exemption which was granted has lapsed as London Underground believed that this had been accepted and is as such retrospectively applying for exemption. In the intervening period, London Underground has been granted a similar exemption on the Northern line based upon experience from the Victoria line. The Sub Surface Railway operates a slightly more complex stopping pattern but has a similarity to the Northern line with branch destinations. Additionally, the Metropolitan line also operates fast, semi-fast and stopping services.

6 Technical, economic and operational reasons why exemption is sought

London Underground is committed to providing timely, accurate and accessible customer information to enable our customers to be confident during their journey, make informed decisions and to minimise the impact of disruption.

As such we are seeking an exemption that would allow the removal of the 'next station' announcement inside the saloon whilst the train is at a platform and the ability to provide this information once the doors are closed for the S7 and S8 at non 'key' stations. A key station is defined as those which the service has the ability to serve different branch destinations or begins to operate different stopping patterns.

The information systems in the S7 and S8 vehicles are adaptable and capable of complying with the Regulation, however we strongly believe that a better service can be provided to passengers by substituting some regulated information with relevant and timely journey information. This includes information on tourist locations, important institutions, interchanges, platform safety and selective door opening (where the train is longer than the platform meaning some doors do not open) messaging. This has been demonstrated in operation on the Victoria and Northern lines since their exemptions were granted. The S-stock fleet has also been operating in the same manner since delivery started to London.

Providing both the next stop and destination within the 'doors-open' time as required by RVAR would increase the dwell time at a large number of platforms, which would have a cumulative effect along the entire journey. This would increase journey times for passengers across the whole line, greatly reducing the capacity and benefit gained from the upgrade improvements which are being delivered.

Given the passenger experience in travelling with the existing announcements for a number of years, it is believed they are both reflective of the information required and appropriate for the type of service which is operated. London Underground has analysed the complaints data from the Northern, Victoria and Sub Surface lines to determine if customers have felt any impact over the last six months specifically targeted on this type of messaging.

Though a number of complaints have been raised regarding information systems on trains, ranging from the volume of announcements, tone and volume of door chimes, repetition of messages (specifically destination and next station) drivers' delivery style and signage confusion, from data collected, there has been only one which was related to the 'next station' and 'destination'

message whilst the train doors are open. The person raising the complaint is blind and was struggling to identify a Watford train when boarding at Northwood Hills. After some correspondence with the customer to further understand the issue, they was obstructing the doors to hear the terminating station information, station announcements are now being made frequently to announce trains arrival times and their destinations. In the longer term, automated station announcements will be delivered to platforms as facilities are upgraded. This is offered in many central London locations already and on those lines which have recently had upgrades completed. More staff are being deployed to public areas to assist customers directly with queries and assistance.

This complaint did not directly related to the information on the train whilst the doors are open, but with the information provision on stations which has been taken forward. From this data set, LU has concluded that the information provision is suitable for customers however continues to monitor and address complaints.

Service patterns

The Circle line and Hammersmith and City line operate direct routes with no branches. The Metropolitan line south of Finchley Road, and the District line east of Gloucester Road run the same type of service. On these routes, LU believes that the 'next station' and 'terminus station' announcements serve the same purpose in providing reassurance to passengers that they are in a train travelling in the right direction.

There are a number of points on the Metropolitan and District lines where the service becomes more complicated and branches off to different destinations.

Metropolitan Line (S8 trains)

North of Finchley Road the Metropolitan line branches to 4 different terminus stations:

Amersham

Chesham

Uxbridge

Watford

In addition between Finchley Road and Moor Park the service has 4 different stopping patterns:

Local trains: These are mainly trains on the Uxbridge Branch and trains on the Watford branch during off peak hours. These trains stop at all stations

Semi-fast trains: These are mainly trains on the Watford Branch during peak hours. These trains do not stop between Finchley Road and Harrow on the Hill stations, missing out Wembley Park, Preston Road and Northwick Park stations

Fast Trains – Peak hours: These are mainly trains on the Amersham and Chesham Branches which do not stop at stations between Finchley Road to Harrow on the Hill and Harrow on the Hill to Moor Park, missing out Wembley

Park, Preston Road, Northwick Park, North Harrow, Pinner, Northwood Hills, and Northwood stations

Fast Trains – Off Peak hours: These are mainly trains on the Amersham and Chesham Branches which do not stop at stations between Wembley Park to Harrow on the Hill and Harrow on the Hill to Moor Park, missing out Preston Road, Northwick Park, North Harrow, Pinner, Northwood Hills, and Northwood stations

District Line (S7 trains)

East of Gloucester Road, the district line has four branch destinations;

Ealing Broadway

Richmond

Wimbledon

Kensington Olympia

LUL recognises the impact these variations may have on passengers' confidence that they are boarding or on board the correct train.

To ensure that passengers have sufficient appropriate information, we have committed to announcing (visually and audibly) all regulated information in full within the dwell time at a number of key stations.

These key platforms will be those prior to a junction or split in service between fast and stopping trains or junction points offering the last opportunity to interchange with other Underground and Chiltern services where action or reassurance may be required. Station announcements (audible and visual) forewarn customers of the services which are due to arrive at the platforms to aid boarding of the correct train. Exemptions are not being requested for these platforms.

A full list of platforms is in the appendix.

Key Platforms

S8 on the Metropolitan line

Chalfont & Latimer	1
Finchley Road	1
Harrow on the Hill	1, 2, 3, 4, 5, 6
Moor Park	1, 2, 3, 4
Wembley Park	1, 2, 5, 6
Baker Street	1, 2
Finchley Road	1, 4
Liverpool Street	1
Rayners Lane	1, 2

S7 on the Hammersmith & City, Circle and District lines

Acton Town westbound	1, 2
Aldgate East westbound	1
Baker Street westbound	6
Ealing Common westbound	1
Earl's Court westbound and eastbound	1, 2, 3, 4
Edgware Road westbound	4
Gloucester Road westbound	1, 2
High Street Kensington westbound	1
Liverpool Street eastbound	1
Tower Hill eastbound	3
Turnham Green westbound	1, 2

Terminus Platforms

In addition, at terminus platforms, trains entering service have an extended doors-open period. This means that at these platforms there is sufficient time to provide all of the necessary information, including both next stop and destination. All regulated information will be given at the following terminus platforms:

S8 on the Metropolitan line

Aldgate	2, 3
Amersham	1, 2, 3
Chesham	1
Uxbridge	1, 2, 3, 4
Watford	1, 2
Watford Junction	3, 4

S7 on the Hammersmith & City, Circle and District lines

Barking	3
Ealing Broadway	7, 8, 9
Edgware Road	2, 3
Hammersmith	1, 2, 3: (H&C/Circle lines)
High Street Kensington	3, 4
Kensington Olympia	1
Plaistow	3
Richmond	4, 5, 6, 7
Tower Hill	2
Upminster	3, 4, 5
Wimbledon	1, 2, 3, 4

We are asking for exemptions only at 'non key' stations. At these stations, the destination information will be broadcast whilst the doors are open and the next station will be given once the doors have closed, during the inter-station run in both audible and visual format.

Currently we are required to give the following information:

"The next station is Kings Cross, St Pancras. This is a Hammersmith & City line train to Barking."

Some additional routine pieces of information given by the customer information system at stations and between stations to assist and inform passengers on the lines include:

"This is a Circle line train via Embankment and Victoria.

Change here for the Northern, Piccadilly and Victoria lines, National and International Rail services.

Exit here for the Royal National Institute of Blind People and the British Library

Change here for the Piccadilly line and District line services to other destinations

The next station has a short platform. The rear two doors will not open there. Please use the other doors

Please mind the gap between the train and the platform."

The exact combination of information messages given in the 'at station' announcement will be specific to individual platforms and delivered automatically. The information given is prioritised according to its usefulness and importance to our customers.

To ensure that the entire message can be played within the doors-open time, LUL has removed all non-essential tourist and interchange information from the at-station announcements. This information is broadcast on the approach to the station.

Additionally, the services which are due to arrive at the platform are announced, both visually and audibly, at regular intervals before trains arrive to help customers boarding trains.

- 7 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

London Underground does not believe that there is detriment to a disabled person's utility from the service when operating under non-compliance. It has been demonstrated that similar exemptions work on other lines on the network. London Underground is committed to providing high quality information to customers and providing solutions where issues are raised. As such, more station staff are being deployed in areas where they can assist customers. Best practise changes are acted upon where identified to ensure that the performance of the system meets customer needs.

Where stopping patterns differ, information will be fully announced at the 'key' stations preceding the service split. Information is made fully available both

audibly and visually in the carriages during the interstation run and similarly at a large number of station platforms.

Safety and Operational Concerns:

Operationally, it is difficult with such short dwell times to give all regulated information and also provide beneficial supplementary information to customers. LU believes that the current provision of terminus information is appropriate for determining direction of travel and maximises the time available to provide the supplementary relevant information.

8 Supplementary information for consideration

Exemptions have been granted on the Victoria and Northern lines to the same effect. Whilst there are some complications in service patterns on the Sub Surface lines, LU believes that the Northern line reflects branch destinations and that customers are not disadvantaged in not being given all regulated information during the dwell time. During the period since the introduction of the S-Stock, the trains have been running with the proposed information being delivered.

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

London Underground does not intend to later modify the vehicles however periodic reviews to the customer information take place. During this time, information applicability is assessed and may be updated if it is felt necessary.

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

A permanent exemption is being sought.

11 Appendix

Station lists for lines including numbers for exemption

S8: Metropolitan line – 48 platforms requested for exemption

Station	Exemption requested	No exemption required	Station	Exemption requested	No exemption required
Aldgate		2, 3	Liverpool Street	1	
Amersham		1, 2, 3	Moor Park		1, 2, 3, 4
Baker St	3	1, 4	Moorgate	1, 2, 3, 4	
Barbican	1, 2		North Harrow	1, 2	
Chalfont & Latimer	2	1	Northwick Park	1, 2	
Chesham		1	Northwood	1, 2	
Chorleywood	1, 2		Northwood Hills	1, 2	
Croxley	1, 2		Pinner	1, 2	
Eastcote	1, 2		Preston Road	1, 2	
Euston Square	1, 3		Rayners Lane		1, 2
Farringdon	1, 2		Rickmansworth	1, 2	
Finchley Road		1, 4	Ruislip	1, 2	
Great Portland St	1, 2		Ruislip Manor	1, 2	
Harrow on the Hill		1, 2, 3, 4, 5, 6	Uxbridge		1, 2, 3, 4
Hillingdon	1, 2		Watford		1, 2
Ickenham	1, 2		Wembley Park		1, 2, 5, 6
King's Cross St. Pancras	1, 2		West Harrow	1, 2	

S7: Circle, Hammersmith and City, District lines - 134 platforms requested for exemption

Station	Exemption requested	No exemption required	Station	Exemption requested	No exemption required
Aldgate	1, 4	1, 2	Latimer Road	1, 2	
Acton Town	3, 4	1, 2	Liverpool Street	2	1
Aldgate East	2	1	Mansion House	1, 3	
Baker Street	5	6	Mile End	2, 3	
Barbican	1, 2		Monument	1, 3	
Barking	1, 2, 6	3	Moorgate	1, 2	
Barons Court	1, 4		Notting Hill Gate	1, 2	
Bayswater	1, 2		Paddington	1, 2, 15, 16	
Becontree	1, 2		Parsons Green	1, 2	
Blackfriars	1, 2		Plaistow	1, 2	3

Bow Road	1, 2		Putney Bridge	1, 3	
Bromley-by-Bow	1, 2		Ravenscourt Park	1, 2, 3, 4	
Cannon Street	1, 2		Richmond		4, 5, 6, 7
Chiswick Park	1, 2		Royal Oak	1, 2	
Dagenham East	1, 2		Shepherd's Bush Market	1, 2	
Dagenham Heathway	1, 2		Sloane Square	1, 2	
Ealing Broadway		7, 8, 9	South Kensington	1, 2	
Ealing Common	2	1	Southfields	1, 2	
Earl's Court		1, 2, 3, 4	St James's Park	1, 2	
East Ham	1, 2		Stamford Brook	1, 2, 3	
East Putney	1, 2		Stepney Green	1, 2	
Edgware Road	1	2, 3, 4	Temple	1, 2	
Elm Park	1, 2		Tower Hill	1	3
Embankment	1, 2		Turnham Green	4	1
Euston Square	1, 2		Upminster		3, 4, 5
Farringdon	1, 2		Upminster Bridge	1, 2	
Fulham Broadway	1, 2		Upney	1, 2	
Gloucester Road	3	1, 2	Upton Park	1, 2	
Goldhawk Road	1, 2		Victoria	1, 2	
Great Portland Street	1, 2		West Brompton	1, 2	
Gunnersbury	1, 2		West Ham	1, 2	
Hammersmith	4	1, 2, 3	West Kensington	1, 2	
High Street Kensington	2	4, 5	Westbourne Park	1, 2	
Hornchurch	1, 2		Westminster	1, 2	
Kensington (Olympia)		1	Whitechapel	1, 2	
Kew Gardens	1, 2		Wimbledon		1, 2, 3, 4
King's Cross St Pancras	1, 2		Wimbledon Park	1, 2	
Ladbroke Grove	1, 2		Wood Lane	1, 2	

Annex B – Consultation responses

DPTAC

S7 and S8 Stock

DPTAC believe that the proposed approach to remove the internal 'next station' announcement requirement whilst the train is at a platform and the doors are open on S7 and S8 services is acceptable on the basis of the reasoning and alternative 'reasonable adjustment' arguments put forward by LUL.

DPTAC are therefore minded to support this exemption request with a caveat that LUL continue to monitor any further customer complaints received in relation to this matter. If you require any further detail in relation to the above, please let me know.

Best wishes,

Dave

ORR

S7/S8 stock: Next stop announcements when a vehicle is stationary in a platform (applicable only a certain stations on the route).

This exemption application seeks to replace an exemption granted in 2013 (and lapsed in 2015), which LUL had assumed was not time limited.

I am content with these proposed exemptions

Keith Atkinson

HM Principal Inspector of Railways

Office of Rail and Road

1 Kemble St,

London

WC2B 4AN

London TravelWatch

Thanks for consulting us on these. London TravelWatch has no objection to these requests for exemptions.

Yours sincerely

Tim Bellenger

Director, Policy and Investigation

Follow us on [Twitter](#) and [You Tube](#).



London TravelWatch, 169 Union Street, London, SE1 0LL