

**Mobility and Access Committee for
Scotland (MACS)**

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2019/42

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Dear Julia,

SPT RVAR DISPENSATION REQUEST

I write on behalf of the Mobility & Access Committee for Scotland (MACS) with respect to the above matter.

I can confirm that we are, in principle, happy to support the request for a dispensation for exemption from the Rail Vehicle Access Regulations (2010) as lodged by the current operator of the Glasgow Subway, Strathclyde Partnership for Transport (SPT), for the reasons detailed below.

We are satisfied that the request for a dispensation is reasonable given the time remaining before the above regulations come into effect, given the significant challenges of remediating accessibility issues with the current rolling stock and rendering it compliant before 2020 and the fact that new rolling stock is being procured and is scheduled for introduction in 2022. We recognize that it is impractical to assert that compliance should be achieved on vehicles that are over 40 years old and due for retirement shortly.

However, MACS is keen to submit that award of the dispensation should not diminish the importance of accessibility and ensuring that disabled people, those with reduced mobility, the elderly and others requiring assistance, are able to travel when and where they wish, with appropriate customer service and support. We note that all stations on the Glasgow subway are staffed and hope that SPT will recognize the importance of and opportunity this provides in ensuring equity of access for all, even where this means passengers travelling to their intended destination station via an alternative mode of transport.

Finally, we note that there is currently no formal assisted travel service provision mirroring that of the Passenger Assist service available on the main line rail network. We would urge SPT to consider extending the current informal assistance offered to passengers in order to provide consistency for those changing between main line and subway networks as well as to render a more accessible metropolitan city-wide subway travel experience for all.

I trust this is helpful. MACS is happy to provide further advice or clarification as needed and look forward to a continued and constructive relationship with yourselves and SPT.

Kind regards and best wishes,

Hussein Patwa
Co-lead, Rail
Mobility & Access Committee for Scotland (MACS)