

Mobility and Access Committee for Scotland
(MACS)
Area 2-D North
Victoria Quay
Edinburgh
EH6 6QQ
Scotland, UK.



27 January 2013

To the European Railway Agency

era-con-2012-07-int@era.europa.eu

Dear Sir/ Madam

Response to the Social consultation on the preliminary draft version 1.0 of revised TSI on Accessibility for Persons with Reduced Mobility covering the Union railway system

The Mobility and Access Committee for Scotland (MACS) was established in 2002. Our role involves giving advice to Scottish Ministers on aspects of policy affecting the travel needs of disabled people, promoting the travel requirements of disabled people with transport planners and operators, and ensuring these needs are fully taken into account in service delivery.

MACS appreciates the opportunity to comment on the preliminary draft of the revised TSI on Accessibility for Persons with Reduced Mobility (PRM).

MACS welcomes the revised PRM TSI with:

- its broader definition of Persons with Reduced Mobility (2.2)
- the addition of automatic and semi-automatic universal toilet doors to allow partial opening for assistant to enter/leave discreetly (5.3.2.4)
- the creation of National Inventories of Assets which will be at the disposal of the public (7.3.4)
- and the National Implementation Plans (7.3.5), most particularly the required consultation with representative associations of users including disabled persons and persons with reduced mobility to set the criteria and priorities according to which stations and units of rolling stock are to be identified, and to identify the stations and units of rolling stock to be upgraded based on these public criteria and priorities.
- MACS also salutes the inclusion of representative bodies of European passengers, persons with reduced mobility and disabled persons

(representative bodies of users) in the Steering Committee which will monitor the implementation of the TSI (7.3.7).

MACS approves the continued importance placed on:

- accessibility both to rolling stock and infrastructure (including stations and parking facilities)
- consistent audio and visual information throughout
- seating for travelling companion of wheelchair user
- provision of adequate information to staff procedures and training
- professional disability awareness and equality training (including the specific needs of each category of PRM) of passenger-facing staff as well as engineers and managers
- provision of alternative assistance to PRM during maintenance, replacement or repair of facilities, and repair or replacement of defective facilities within a week.

MACS would recommend the following amendments:

- 4.2.1.1. Parking facilities for PRM.

We appreciate that these facilities are covered by the PRM TSI “where a station specific parking area exists”. Ideally, all stations should have such facilities to facilitate PRM access and should be encouraged to do so, but we recognise that this is not always feasible. However, some PRM will not be able to access a station without the use of private transport. In order to address this issue, we would like an addition to this section stating that at least “all stations should have a suitable drop-off / pick-up zone reserved for PRM at the nearest practicable position to an accessible entrance”.

- 4.2.1.2.2. Vertical circulation

It would be useful to specify what is understood by ramps of “moderate” or “steep” gradient, and what is considered as “short distances”.

- 4.2.1.7 Furniture and free-standing devices

“On each platform where passengers are allowed to wait for trains, and at every waiting area, there shall be a minimum of one area fitted with seating facilities and space for a **minimum of one** wheelchair” [words in bold to be added to current statement].

MACS is still concerned with:

- the exemption from having to provide boarding aids if there is an accessible station “within 30km, on the same route” (4.4.3.1 and 4.4.3.2).

We understand that in the current economic climate and due to the constraints linked to the geographical location and/or historical significance of some stations, it is unfortunately very unlikely that every single station will

eventually be fully accessible. We also appreciate that the revised PRM TSI includes the addition of a requirement for “conditions for the provision of alternative transport” (4.4.3.4) to be defined in managing agreements. If such exemptions over such a distance should still appear in the revised TSI, the aforementioned provision of alternative support should be defined in more details, as being an automatic requirement that should be easily accessible, and at no additional charge to the PRM.

We look forward to hearing the results of your consultation and to your next draft for the revised PRM TSI.

Yours sincerely,

ANNE MacLEAN OBE

Convener