



3rd February 2012

Mr Simon Ryan
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Dear Mr Ryan,

Response to Bill Ellson letter dated 11th December re: Tower House, 38-40 Trinity Square, London EC3N 4DJ Ref No: PA/11/00163

Tower Hill is a busy station, ranked 22nd in terms of entries and exits (nearly 22 mpa (million persons per annum)). The station has a high tourist market segment (9% compared to 3% network average) and so has an important profile in attracting overseas visitors to London. The tourist market segment is on a par with Piccadilly Circus (also 9%) and higher than Embankment at 6%. Therefore a variety of users will benefit from the station becoming accessible including passengers with luggage, parents with pushchairs, passengers with reduced mobility (PRMs) and disabled persons. Approx 200,000 new trips will be generated per annum if Tower Hill were to become accessible.

London Underground (LU) is fully aware that for wheelchair users, the step and gap between the train and the platform is a barrier to using the tube. This is why LU has pioneered the use of, and has won awards¹ for the installation of 'level access boarding points' on platforms known as Platform Humps. These allow wheelchair users to board regulated² trains at designated doorways which align with wheelchair spaces. The rail industry, DfT and Disabled Persons Transport Advisory Committee have recognised this as an innovative and important way of meeting our obligations to disabled people in an intensive metro service. LU has invested approximately £11m on the District, Circle and H&C lines installing these level access points.

The new S-stock vehicles which will be introduced on the District and Circle lines are also RVAR regulated. The vehicles have been designed with a 'low floor' which means they are typically 150mm lower than the current D-Stock

¹ London Underground 'platform humps project' won the CILT(UK) Award for Excellence 2009 in the Passenger Transport category.

² A regulated train is one which complies with the requirements set out in the Rail Vehicle Accessibility Requirements (RVAR) 1998, amended 2010, part of the DDA 1995, amended 2010.

Registered office is as above.

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trains used on the District line and because of this design, platform humps are not required. However to ensure the step and gap meets the requirements of RVAR (maximum step of 50mm and gap of 75mm) platform edge 'adjustments' have been made on a number of platforms and will be made on all of those sites agreed with by the DfT in our exemption application.

As Bill Ellson has pointed out, the S7 S-stock RVAR exemption application requests an exemption for Tower Hill on the basis of the severe curvature of the platform. This curvature makes it physically impossible to achieve the level access RVAR tolerance. In short the train would strike the platform if we tried to modify it to achieve the dimensions. Further details are available in the application.

Based on Platform Train Interface data, LU estimates that the step and gap will change as follows:

From a step of 120mm and gap of 96mm with current trains
To a step of 0mm and a gap of approximately 150mm with new S-stock trains.

The significant reduction of the step will make it easier for wheelchair users to board the train either independently, if the user is able to do so, or with staff assistance (e.g. steadying the wheelchair during boarding, much as a pushchair user does with a pushchair)

Whilst the horizontal gap increases by virtue of longer car length, a large portion of passengers who travel in manual wheelchairs will benefit by the removal of the step which is the more significant obstacle.

LU, as part of TfL, adopts the Social Model of Disability which means that TfL accepts:

- That it is society's response to a person's impairment or learning difficulties that creates disability;
- That discrimination against disabled and Deaf people is just as oppressive as discrimination against other groups such as women, lesbian, gay man, bi-sexual or transgendered people or people from black, Asian or minority ethnic (BAME) groups.

Therefore LU believes that:

- Some wheelchair users, particularly manual wheelchair users will be able to manage the step and gap which will be provided once the new S-stock trains are in service from 2014
- Some wheelchair users will be able to manage the step and gap with assistance from a member of staff, e.g. by steadying the back of the wheelchair.
- Some wheelchair users will require the use of a boarding aid (Manual Boarding Ramp- MBR). Discussed later.

None of these groups of users will be able to access Tower Hill without step-free access and wider landscaping being provided as part of this Planning Application, since there is more than 30 steps between the street and platform and steps to access DLR and Tower of London. In addition, many other users will continue to find it difficult to access Tower Hill because of the steps including older people, children, parents with pushchairs, customers with luggage and other disabled people who use lifts.

LU would be interested to see the safety assessment which supports the statement '*It will simply not be safe for wheelchair users to attempt to board or get off trains at the station*' mentioned in Bill Ellson's letter.

We have a number of stations currently where steps and gaps exist and wheelchair users are using the train service. We are committed to doing everything we can to improve both the stations and the trains to make it easier for these users to board, in line with our legal obligations.

LU has recently updated the standard tube maps which identify the level of accessibility at each station by a wheelchair symbol either filled in either white or blue. White indicating SFA from street to platform and blue indicating SFA from street to train. In addition a step-free tube guide was updated in August 2011 enabling passengers with restricted mobility to navigate independently across the network.

With the Developers planning application approved and the civil structures for the Step free access (SFA) scheme being completed by the Developer, LU will be able to commission and fit out the lifts, providing a scheme that delivers value for money and step free access from platform to street by 2013/14. From this point forward passengers will also realise the wider interchange benefits from this scheme as they will be able to access Tower Hill tube station, Tower Gateway (DLR), Fenchurch Street station (NR) and Tower of London.

'*Fully accessible*' is not a term which LU uses since disabled people are not a homogenous group of people and may have a wide variety of needs. Consequently it is unlikely that any building or public realm could be called '*fully accessible*' in any meaningful way. We do however refer to stations as 'step-free from street to platform' and 'step-free from street to train' and we have delivered and continue to deliver other improvements across all customer facing assets to ensure they meet the needs of disabled customers.

London Underground recently completed a trial of Manual Boarding Ramps. The high frequency of the LU service and the fact that it is 'turn up and go' for all users means that providing MBRs could be very challenging. The trial was to determine how these might be used in the live environment.

We are now analysing the data to determine whether these could be used for the Olympics and Paralympics. This could provide a viable solution for severely curved platforms.

This approach demonstrates LU's ongoing commitment to and continuous improvement of the needs of disabled people.

London Underground believes that it has represented the facts in this matter and is happy to supply this additional information and that we have in no way '*overstated*' the '*public benefit*', nor have we '*grossly misled*' elected members sitting on the Strategic Development Committee.

We would be happy to show members of the development committee the high use that our 63 step-free stations receive.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mike Crabtree', with a stylized flourish at the end.

Mike Crabtree
Senior Project Sponsor