

21-022 - Guidance on the ACC NTSN

Version:	5.0		
Purpose:	Approval to proceed to consultation		
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Sponsor:	Tom Lee – Director of Standards		
Lead industry committee:	Infrastructure Standards Committee (INS SC)	Date:	08 July 2024
Supporting industry committee:	Rolling Stock Standards Committee (RST SC)	Date:	26 June 2024

Decision

The lead standards committee (INS SC) is asked to **APPROVE** to proceed to consultation. In doing so, the committee has **DECIDED** that the document(s):

- a) Deliver the intentions of the proposal for change.
- b) Are in a suitable state for consultation.
- c) Can be consulted on for withdrawal.

The lead standards committee (INS SC) is also asked to:

- d) **IDENTIFY** any specific stakeholders to be included in the consultation.
- e) **DECIDE** whether the consultation can be carried out within the committee or should be an industry wide consultation.

The supporting standards committee (RTS SC) is asked to:

- f) **SUPPORT** to proceed with the above consultation.
- g) **CONSIDER** whether they need any further involvement in the project beyond this stage.

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This business case for change has been developed to support standards committees in taking decisions related to changes to standards, it includes an assessment of the predicted impacts arising from the change.

Proposed new document

Number	Title	Issue
GEGN8615	Application of the Accessibility NTSN	two

Proposed superseded document

Number	Title	Issue
GEGN8615	Application of the PRM NTSN	one

Summary

Background and change

GEGN8615 issue one was published in June 2021 to provide guidance for users on the application of the Persons with Reduced Mobility National Technical Specification Notice (PRM NTSN). This includes aspects related to both infrastructure and rolling stock.

In February 2024, RSSB submitted an industry recommendation to the Department for Transport (DfT) for the revision of the PRM NTSN. As part of this, an industry consultation was held on the then proposed recommendations. The consultation highlighted areas where industry identified potential benefits from revising the accompanying PRM NTSN Guidance Note. There were also instances where the content of the NTSN changed, making the content of the accompanying Guidance Note outdated.

The periodic review of GEGN8615 issue one in September 2022 identified possible improvements to it, but proposed waiting until the revision to the PRM NTSN was published. In May 2025, the Secretary of State for Transport published the revised PRM NTSN which has been renamed the Accessibility (ACC) NTSN issue 1. This change of name is reflected in the proposed GEGN8615 issue two.

Proposed GEGN8615 issue 2 takes into account new knowledge and changes. This includes the ACC NTSN issue 1, comments received during consultation on the industry recommendation to the NTSN and discussions in the Mirror Group.

The content of the proposed GEGN8615 issue two is aligned with the ACC NTSN issue 1, which will help industry stakeholders to understand and apply its requirements.

In parallel with this work, a general NTSN Guidance Note (GEGN8601, issue one) is being created, covering topics that span multiple NTSNs and the interoperability framework more generally. This means the guidance within proposed GEGN8615 issue two is focused on guidance for specific technical requirements in the ACC NTSN issue 1.

Industry impact due to changes

Impact areas	Scale of impact	Estimated value £ 000's
A. Legal compliance and assurance	Medium	35 - 165
B. Health, safety and security	Low	-
C. Reliability and operational performance	Neutral	-
D. Design and maintenance	Medium	10 - 55
E. People, process and systems	Low	-
F. Environment and sustainability	Low	-
G. Customer experience and industry reputation	Medium	Disproportionate to quantify
Total value of industry opportunity =		45 - 220 (over 5 years, based on project cost savings only)
The standards change contribution to the total value of industry opportunity		

<input type="checkbox"/> None or low	<input type="checkbox"/> Minor but useful	<input checked="" type="checkbox"/> Moderate	<input type="checkbox"/> Important / essential	<input type="checkbox"/> Urgent / critical
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Detail

1. What were the objectives associated with this change?

Objective 1 – Provide guidance for changes to the NTSN since previous guidance was published.

- 1.1 The Guidance Note GEGN8615 issue one, *Application of the PRM NTSN* was published in June 2021. This Guidance Note reflects the PRM NTSN, which replaced the PRM Technical Specification for Interoperability (TSI) in Great Britain (GB) on 1 January 2021.
- 1.2 RSSB submitted a formal industry recommendation for a revision to the NTSN to the Secretary of State for Transport in February 2024. The recommendation took into account revisions to the corresponding TSI published in September 2023. In May 2025, the DfT published the NTSN and renamed it as the Accessibility (ACC) NTSN issue 1. This contains differences in detail compared to the industry recommendation.
- 1.3 The NTSN does not contain guidance to support the requirements contained within it. This is because the structure of the NTSN is the same as the TSI, which also does not contain guidance. For the recently revised Persons of Reduced Mobility TSI, the European Union Agency for Railways (ERA) has updated its 'Application Guides', which contain supporting guidance, particularly for new and revised requirements. Unless guidance on the NTSN changes is also provided, this will leave a gap where there is no equivalent industry-agreed guidance in GB for revised NTSN requirements.

Objective 2 – Enhance existing guidance based on industry feedback, 12-month review and TSI guidance.

- 1.4 Existing guidance has been assessed for its adequacy and fitness for purpose, based on industry feedback, reviews of the existing guidance and potential gaps in guidance following the UK's departure from the EU.
- 1.5 The consultation on the revision to the PRM NTSN (now ACC NTSN) attracted numerous comments, which either directly or indirectly suggested that additional guidance on certain requirements could benefit industry.
- 1.6 The periodic review on GEGN8615 issue one, undertaken in September 2022, identified the benefit of additional guidance, but it was not deemed appropriate to update guidance at that time owing to the ongoing NTSN revision process.
- 1.7 The PRM TSI Application Guide, published by the ERA, includes guidance on the TSI requirements. This means there is a need to identify where similar guidance to the TSI Application Guide needs to be provided within the NTSN Guidance Note and tailored where appropriate to suit GB use.

2. How has the content in the standard changed to achieve the objectives?

Objective 1 – Provide guidance for changes to the NTSN since previous guidance was published.

- 2.1 The content of proposed GEGN8615 issue two has been updated to reflect the content of the ACC NTSN issue 1. This includes the revision of existing guidance where the content has changed from the PRM NTSN, the replacement of guidance where it is no longer relevant and the addition of new guidance.
- 2.2 The ACC NTSN issue 1 was published by the Secretary of State in May 2025. The areas of change requiring new or changed guidance include:
- a) Station obstacle-free route, particularly tactile wayfinding and warnings for steps and stairs.
 - b) Station facilities, particularly nappy changing facilities and information or sales points.
 - c) Station train departure information.
 - d) Rolling stock door signals.
 - e) Rolling stock wheelchair operational requirements.
 - f) Platform ramps and lift stability.
 - g) Assessments, covering specific assessments such as contrast for rolling stock and more general assessments such as obligations for site visits.
 - h) Consultations for planning new stations.
 - i) Any elements of NTSN application that are not included in the general NTSN Guidance Note (GEGN8601 issue one), which is planned for development in parallel with proposed GEGN8615 issue two.

Objective 2 – Enhance existing guidance based on industry feedback, 12-month review and TSI guidance.

- 2.3 The content of proposed GEGN8615 issue two has also been updated based on comments received during the consultation on the revision of the ACC NTSN (known as the PRM NTSN at the time of the consultation), which identified where existing requirements would benefit from new or revised guidance. This includes topics such as:
- a) Terms related to scope of application, such as station buildings and car parks.
 - b) Requirements that may be permitted under interoperability but need more clarification regarding use such as level track crossings, floor irregularities, or lift size.
- 2.4 The content was also informed by the findings of the periodic review, which highlighted areas where further or revised guidance may be appropriate. This includes areas such as:
- a) The use of covers on call for aid buttons.
 - b) Provision of wheelchair spaces in first and / or standard class.

- 2.5 There are also publications referenced within GEGN8615 issue one which have since been updated, so these references have been amended as required in proposed issue two. This includes references to European Standards, Railway Group Standards and Rail Industry Standards.
- 2.6 To cover areas where the TSI Application Guide previously provided guidance in GB, where this is deemed still relevant and useful to GB, these topics have been integrated into proposed GEGN8615 issue two, with modifications where necessary to reflect GB application. GEGN8615 issue one already included a lot of relevant guidance from the TSI application guide, and this has been reviewed against the 2023 PRM TSI application guide.
- 2.7 After receiving the industry recommendation for the revised PRM NTSN, the Department for Transport made some further amendments. The most significant of these is in the requirements for wayfinding tactiles in stations. Proposed GEGN8615 issue two reflects those changes.

3. How urgently does the change need to happen to achieve the objectives?

- 3.1 Publication of a revised Guidance Note should be soon after the Secretary of State's publication of the ACC NTSN issue 1 to support its implementation.

4. What are the positive and negative impacts of implementing the change?

Justification of impact, scale and quantification for the seven impact areas

A. Legal compliance and assurance

- 4.1 The publication of revised guidance for the ACC NTSN issue 1 will support the appropriate implementation of the technical requirements in the ACC NTSN, which apply under the Railways (Interoperability) Regulations (as amended) 2011 (RIR). As part of the application of the ACC NTSN under RIR for an authorisation to place into service, there is an independent assessment of whether the requirements have been met. This evidence forms part of the ORR's decision to issue an authorisation. This means requirements need to be consistently applied in an agreed way between the project entity, conformity assessment body and ORR.
- 4.2 This guidance for the implementation of the requirements has an impact in two areas:
- a) Cost savings due to the efficiency in delivery by reducing the need for discussion and agreement about the suitable application of the requirements, or the risk of challenges to how requirements have been implemented. This may be discussions within the project team, or between the project team and conformity assessment bodies or the ORR, or queries raised between technical experts. An estimate of the cost saving as a result of this is **£30k - £135k over 5 years**.

- b) Cost savings due to avoidance of rework or needing additional work at a late stage. This may be the case if there is a lack of understanding from the project team about the application of the requirements, where the conformity assessment body or ORR takes a different view. An estimate of the cost saving as a result of this is **£5k - £30k over 5 years**.
- 4.3 For efficiency costs in a), this is based on the average number of station and passenger rolling stock projects per year requiring authorisation to place into service and therefore needing to comply with the ACC NTSN issue 1 (16 per year between 2019-2023), and an average time and cost saved on discussions and queries on each project. For the lower end of the estimate, this is assumed to be a 2-hour saving for 8 people with average costs of £25 per person per hour. For the higher end of the estimate, this is assumed to be a 3-hour saving for 10 people with average costs of £55 per hour. This results in a range of £6k - £27k of cost savings per year.
- 4.4 For avoidance of rework and late-stage work in b), this is difficult to robustly estimate as these are likely to be low frequency, high impact events. The estimate is based on assumptions that this may apply to only 1-2% of projects (equivalent to 0.2-0.3 projects per year) and result in a delay of between 1-3 weeks to the project. The average cost of delay is assumed to be £8k - £20k based on the cost of a project team of 8-10 people. This is likely to be a conservative estimate, as it ignores potentially significant costs which are very substantial, such as costs of materials, costs of keeping entire project teams running and costs of delay to station opening in terms of the passenger/industry impact.
- 4.5 Based on historic frequency of PRM TSI updates and maturity of requirements in this area, it is reasonable to assume that most requirements and guidance will be applicable for at least five years so, for this assessment, estimates have been scaled over five years.
- B. Health, safety and security**
- 4.6 Suitable application of the ACC NTSN issue 1 contributes to the general health and safety of persons with reduced mobility but also benefits all passengers and staff on the GB network.
- C. Reliability and operation performance**
- 4.7 No specific benefits for reliability and operation performance are expected, though supporting improved passenger movements when boarding or alighting improves operational performance of services.
- D. Design and maintenance**
- 4.8 Guidance on the ACC NTSN issue 1 will assist all those involved in the design of passenger rolling stock and station infrastructure to meet their legal obligations and to follow good practice. This will improve efficiency and shorten project lead times.
- 4.9 A conservative estimate of the cost saving as a result of improved project efficiency is **£10k - £55k over 5 years**. This is in addition to cost savings identified in part 4 A of this

business case for change, as it reflects the support provided to designers through, for example, providing references to other documents they may not be aware of such as European Standards, which can be used to support requirements in the ACC NTSN issue 1.

- 4.10 This estimate is based on the average number of station and passenger rolling stock projects per year requiring authorisation to place into service and therefore needing to comply with the ACC NTSN issue 1 (16 per year between 2019-2023), and an average time and cost saved on each project. For the lower end of the estimate, this is assumed to be a 2-hour saving for 2 designers/engineers with average costs of £25 per person per hour. For the higher end of the estimate this is assumed to be a 3-hour saving for 4 designers/engineers with average costs of £55 per person per hour. This results in a range of £2k - £11k of cost savings per year. Based on historic frequency of PRM TSI updates and maturity of requirements in this area, it is reasonable to assume that most requirements and guidance will be applicable for at least five years so, for this assessment, estimates have been scaled over five years.

E. People, process and systems

- 4.11 Guidance on the ACC NTSN issue 1 will assist all those involved in the design of passenger rolling stock and station infrastructure to meet their legal obligations and to follow good practice. This will improve efficiency and shorten project lead times and so is part of the benefit identified in part 4 A and 4 D of this business case for change.

F. Environment and sustainability

- 4.12 Improvements to application of the ACC NTSN issue 1 will have a small impact on the environment and sustainability through use of good practice solutions in areas such as lighting.

G. Customer experience and industry reputation

- 4.13 Guidance on the ACC NTSN issue 1 supports consistent application of the requirements and as such helps to deliver their intent. This benefits passengers with improvements to accessibility. While this is likely to be at least as significant as the cost savings from projects identified above, this is unproportionate to quantify, and even more so for the contribution of improved guidance.
- 4.14 There are expected to be four qualitative areas of benefits with improved implementation of accessibility requirements, which guidance is a contributor to:
- a) Existing rail users – improvements in accessibility contribute to the general positive experience of all passengers and staff on the GB network and thus to industry reputation.
 - b) New rail users – there is evidence that improving rail accessibility encourages more rail journeys and attract new people to rail. Examples are:

- i) The number of Disabled Persons Railcards in circulation increased by 68% over the ten years from 2012/13 to 2022/23¹, which has happened alongside improvements in accessibility requirements and the Access For All programme.
 - ii) A study on step-free rail access in the UK in 2021 for European Transport Research Review demonstrated a clear positive correlation between the percentage of disabled and senior rail travellers and the level of step-free accessibility at railway stations.²
 - iii) A Steer paper for the International Transport Forum/OECD in 2017 on the Benefits of Improving Access to the United Kingdom Rail Network via the Access For All Programme used surveys to show views on the impact of improvements encouraging people with reduced mobility to use station more.³
- c) Train operators and industry as a whole – more journeys as a result of improved experience means an increase in rail revenue.
 - d) Wider society – there are other economic and social benefits. Some are tangible, such as the marginal benefits of increased rail usage meaning reduced car usage, and some are intangible, such as the societal benefits of increased equality of opportunity.

5. What is the contribution of this standards change in realising the value to industry opportunity?

- 5.1 Updating GEGN8615 issue two to align with the ACC NTSN issue 1 and enhancing any existing guidance on the basis of industry feedback, reviews and TSI guidance will assist industry in the application of requirements. This supports efficient and consistent application of NTSNs, with reduced risk of rework or disagreement/challenges during the authorisation process.

6. What was the effort required by RSSB to make the change?

- 6.1 The responses to consultation on the revision to the PRM NTSN in December 2023 (now the ACC NTSN), the periodic review on the existing guidance, and the TSI Application Guide provide a set of inputs for changes to guidance. These have been reviewed, and proposals for guidance are a combination of adapting existing guidance from these areas and developing new guidance where needed.
- 6.2 The NTSN consultation did not request the identification of areas to be covered specifically in guidance. As such, the drafting of the new and revised guidance has been

¹ <https://dataportal.orr.gov.uk/statistics/passenger-experience/disabled-persons-railcards/>

² <https://etrr.springeropen.com/articles/10.1186/s12544-021-00504-3>

³ <https://www.itf-oecd.org/sites/default/files/docs/benefits-improving-access-uk-rail-network.pdf>

undertaken in collaboration with various stakeholders and groups and committees to ensure its adequacy and effectiveness.

7. Can RSSB deliver against industry's expected timescales?

- 7.1 RSSB has allocated resources and a programme accordingly to develop proposed GEGN8615 issue two. Its development has been dependent on the publication by the Secretary of State of the ACC NTSN issue 1. The NTSN was published in May 2025.

8. How will the industry implement the change?

- 8.1 There are technical changes in the ACC NTSN issue 1, which, in some cases, introduce new topics. The publication of proposed GEGN8615 issue two will support industry in implementing the changes in the ACC NTSN issue 1. This guidance will also enable and promote a common understanding on issues whilst providing good practice for industry to benefit from.
- 8.2 The Guidance Note will not change any industry practice itself, rather it will support its users in interpreting the ACC NTSN issue 1 and choosing how to approach respective requirements. Therefore, this Guidance Note will not impact industry practices through implementing change.

9. How will RSSB assess whether the change is achieving the objectives?

- 9.1 Industry will be consulted as part of the standards change process, providing an opportunity for feedback on the usefulness of the proposed GEGN8615 issue two. After publication, RSSB will continue to seek the views of industry through various forums to ensure proposed GEGN8615 issue two meets the needs of industry.
- 9.2 Furthermore, as part of the normal standards process RSSB will periodically review proposed GEGN8615 issue two to ensure its contents are fit for purpose.

Appendix A Disposition Table

A.1.1 Only sections that have been subject to review have been included in the disposition table. Sections not mentioned below remain unchanged.

Table A1: GEGN8615 issue one to GEGN8615 issue two

From GEGN8615 issue one	To GEGN8615 issue two	Way forward	Comments	Objective
Title	Title	Revised	Revised to reflect change from PRM to ACC NTSN	1
G1.1 Purpose	G1.1 Purpose	Revised	Editorial changes and updated references	1
G1.2 Background	G1.2 Background	Revised	Editorial changes	1
G1.3 Health and safety responsibilities	G1.3 User's responsibility	Revised	Editorial changes	1
G1.4 Structure of this document	G1.4 Structure of this document	Revised	Editorial changes and updated references	1
G2.1.1 Infrastructure – general	G2.1.1 Infrastructure – general	Revised	Editorial changes and additional guidance added	1
G2.1.2 Application of this NTSN to new infrastructure	G2.1.2 Application of this NTSN to new infrastructure	Revised	Editorial changes and additional guidance added	1
G2.1.3 Application of this NTSN to existing infrastructure	G2.1.3 Application of this NTSN to existing infrastructure	Revised	Editorial changes and additional guidance added	1
G2.2 Obstacle-free route	G2.2 Obstacle-free route	Revised	Editorial changes, updated references and additional guidance added	1
G2.3 Floor surfaces	G2.3 Floor surfaces	Revised	Editorial changes, updated references and additional guidance added	1
G2.4 Highlighting of transparent obstacles	G2.4 Highlighting of transparent obstacles	Revised	Editorial changes and updated references	1
G2.5 Furniture and free-standing devices	G2.5 Furniture and free-standing devices	Revised	Editorial changes and additional guidance added	1
	G2.6 Visual information	New	Additional guidance requested by industry	2
G2.6 Lighting	G2.7 Lighting	Revised	Editorial changes, updated references and additional guidance added	1
G2.7 Platform width and edge of platform	G2.8 Platform width and edge of platform	Revised	NTSN contents revised and guidance updated accordingly	1

From GEGN8615 issue one	To GEGN8615 issue two	Way forward	Comments	Objective
G2.8 End of platform	G2.9 End of platform	Revised	Editorial changes and updated references	1
G3.1 Rolling stock – general	G3.1 Rolling stock – general	Revised	Editorial changes and additional guidance requested by industry	2
G3.2 Seats	G3.2 Seats	Revised	Editorial changes, updated references and additional guidance added	1
G3.3 Wheelchair spaces	G3.3 Wheelchair spaces	Revised	Editorial changes, updated references and additional guidance added	1
G3.4 Doors	G3.4 Doors	Revised	Editorial changes, updated references and additional guidance added	1
G3.5 Lighting	G3.5 Lighting	Revised	Editorial changes	1
G3.6 Toilets	G3.6 Toilets	Revised	Editorial changes	1
G3.7 Clearways	G3.7 Clearways	Revised	Editorial changes	1
G3.8 Customer information	G3.8 Customer information	Revised	Editorial changes, updated references and additional guidance added	1
G3.9 Height changes	G3.9 Height changes	Revised	Editorial changes	1
G3.10 Handrails	G3.10 Handrails	Revised	Editorial changes	1
G3.11 Wheelchair accessible sleeping accommodation	G3.11 Wheelchair accessible sleeping accommodation	Revised	Editorial changes and updated references	1
G3.12 Step position for vehicle access and egress	G3.12 Step position for vehicle access and egress	Revised	Editorial changes, updated references and additional guidance added	1
G3.13 Boarding aids	G3.13 Boarding aids	Revised	Editorial changes, updated references and additional guidance added	1
G3.14 Call for aid devices	G3.14 Call for aid devices	No change		
Appendix A DfT and RSSB joint statement		Removed	No longer needed as covered in the NTSN	1
Definitions	Definitions	Revised	Updated in line with rest of document	1
References	References	Revised	Updated in line with rest of document	1