

Consultation comments and responses

Document Title: **Persons with Reduced Mobility National Technical Specification Notice (PRM NTSN)**

Consultation closing date: **11 December 2023**

1. Responders to consultation

No	Name	Company
1	Jackie Rawlings	ORR
2	James Russell	AtkinsRéalis
3	Simon Watkins	Mobility and Access Committee for Scotland organisation
4	Dave Partington	Disabled Persons Transport Advisory Committee (DPTAC)
5	Anthony Dewar	Network Rail
6	Stuart Cokayne	DB ESG
7	Chris Duddy	Avanti West Coast
8	Frank Cotter	Network Certification Body (NCB) – A Network Rail Company
9	Joe Bull	RSSB
10	Steve Williams	Network Rail
11	Reuben McDonald	HS2
12	David Polhill	Provided through Infrastructure Standards Committee
13	Daniela Phillips	Ricardo Certification Ltd
14	Samantha Sleights	Rail Partners
15	Jen Hicks	Angel Trains Ltd
16	Brian Tomlinson	Network Rail
17	David Galloway	Provided through Rolling Stock Standards Committee
18	Sue Perry	Great Western Railway

Total comments received: 131

Note: Specific comments on the PRM NTSN are tabulated in Section 3 and general NTSN comments are tabulated in Section 4.

2. Comments classification

Classification codes for a way forward:

- DC – Document change
- NC – No change

3. Collated consultation comments and responses

No	Respondent	Comment	Suggestion	Way forward	Page	Clause	Response
1	1	Currently, majority of authorisation applicants are using the clarification in the ERA Guide "Areas that are not controlled by the Railway Undertaking, Infrastructure Manager or Station Manager (either directly or through subcontractors) are out of scope; this can be the case, for instance, of car parks."	We think it would be clearer to include the UK definition of "station specific" parking area within NTSN standard, or alternatively clarified in the RSSB Guidance GEGN8615 to avoid ambiguity.	NC	19	4.2.1.1	2.1.1 of the PRM NTSN contains the definition of the scope for infrastructure. It states, 'This NTSN applies to all the public areas of stations dedicated to the transport of passengers that are controlled by the railway undertaking, infrastructure manager or station manager' so this is consistent with the ERA guidance but agree that further guidance should be considered for the forthcoming update to the PRM NTSN guidance note.
2	2	Comment from David Davies of AtkinsRéalis: There is no reference to the wider public realm, and specifically the public highway.	Whilst the public highway is outside the scope of NTSNs, we suggest that a comment is added directing engineers into considering the integration with the public realm.	NC	19	4.2.1.2 (1)	Thanks for raising this issue, but as this proposal needs further discussion and is not related to a change made to the TSI or a change proposed through the consultation to address an existing issue with the NTSN it is outside the scope of this revision and is proposed to be added to the NTSN issues log for discussion and resolution in a future revision of the NTSN or guidance.
3	3	Ramps – shortest route	Support retention of this, disabled passengers should not be disadvantaged in this way.	NC	19	4.2.1.2 (2)	Noted
4	4	Direct route – Agree with RSSB qualitative reasoning.		NC	19	4.2.1.2 (2)	Noted
5	2	Comment from Stephen Wasson of AtkinsRéalis: I can see removing the requirement for the shortest practical distance may help with the design of AfA footbridges.	The most logical approach to the design would be to have the stairs nearest to the entrance to the station, and a walk-through lift with its platform entrance to the rear of the footbridge, this goes against the current PRM guidance which indicates that the lift should be the shortest route.	NC	19	4.2.1.2 (2)	An interesting point that had not been considered but this can be clarified through PRM NTSN guidance note, as there is some interpretation around 'practical' in this requirement. In the suggested example, it is unlikely that it is practical for the lift to be in front of the stairs. As this requirement is supported by other consultation responses, propose to keep the requirement.
6	5	160cm dimension conflicts with the DfT Accessible stations code of practice whose guidance states that 2000mm is recommended in section F1 a. We note that section F1 a of the DfTCoP is an advisory clause but consider there is a need to ensure guidance and mandatory information is aligned or clearly highlighted as to why they differ.	Align various requirements documents. We note the Hostile Vehicle Mitigation dimension in 4.2.1.2.1 is supported.	NC	19	4.2.1.2	The requirement of 160 cm is not a proposed change, it is the same requirement as in previous versions and therefore not within the scope of this change. There is not a conflict with the DfT CoP in that the PRM NTSN sets minimum requirements that must be met in all areas, whereas the wider value is guidance in the CoP.
7	4	Permitting narrower width for hostile vehicle mitigation structures – DPTAC understand this is a technical aspect and therefore have no comment in respect of this component. Should RSSB wish to further discuss any concerns which may arise in respect of this aspect, we are happy to do so post consultation.		NC	20	4.2.1.2, 4.2.1.2.1	Noted
8	2	Comment from Steven Maslin of AtkinsRéalis: It is understood that requirements are minimum requirements and that there is a desire not to depart too much from EU requirements, but a common issue is the adequacy of barrier matting and moisture removal from shoes before people transition onto internal flooring	Requirement for barrier matting / moisture removal to be placed at the entrance point.	NC	20	4.2.1.2.1	Thanks for raising this issue, but as this proposal needs further discussion and is not related to a change made to the TSI or a change proposed through the consultation to address an existing issue with the NTSN it is outside the scope of this revision and is proposed to be added to the NTSN issues log for discussion and resolution in a future revision of the NTSN or guidance.
9	3	Steps – marked from min 2 steps	Very supportive of this. Even two steps can create problems for visually or physically impaired passengers.	NC	20	4.2.1.2.2 (2) (2a) (2b) (4)	Noted

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10	2	Comment from Steven Maslin of AtkinsRéalis: This requirement can be confused with tonal contrast for nosings throughout and has led some to think that yellow nosings are required top and bottom.	We should really see the requirement for contrasting nosings on all treads	NC	20	4.2.1.2.2 (2a)	This is an existing requirement and therefore changes are not within the scope of this NTSN revision. Propose that this is clarified through upcoming revision to PRM NTSN guidance note.
11	2	Comment from Steven Maslin of AtkinsRéalis: The meaning of the second sentence doesn't seem clear enough.	Please improve clarity of the sentence.	NC	20	4.2.1.2.2 (2a)	It is unclear what is not clear about this sentence and what change is needed to improve the clarity, and therefore propose to keep as in the current NTSN proposal (which is consistent with the TSI wording).
12	4	Warnings for handrails for steps and stairs – It is suggested RSSB seek views of RNIB and Guide Dogs with regards to the proposal to amend the following: “As a minimum tactile warning surface indicators shall be installed before the first descending step of staircases of two steps or more.” There might be a risk of a visually impaired person falling up / down one step, hence this suggestion.		NC	20	4.2.1.2.2 (2) (2a) (2b) (4)	It is difficult to substantiate the need for this to apply to a single step to new and upgraded stations given requirements in BS 8300 mean single steps should not be introduced. This needs further consideration and will be recorded on the NTSN issues log with a note that RNIB and Guide Dogs views are needed. In the meantime, there is a need to include a number in the NTSN so that this is consistently applied rather than based on ApBo interpretation. As such, the proposal provided for consultation of 2 steps, which aligns with buildings regulations, will be put forward. This is a minimum technical requirement which does not preclude use of tactile warning on a single step as the result of risk assessment.
13	6	Would suggest that a tactile warning surface should be provided for any change in floor height.		NC	20	4.2.1.2.2.2b	Please see the response to comment 12.
14	2	Comment from Steven Maslin of AtkinsRéalis: The terms moderate and steep are ambiguous.	Provide further clarity as to where these terms are defined.	NC	20	4.2.1.2.2 (3)	This needs to be considered for upcoming revision of the PRM NTSN guidance. The current PRM NTSN Guidance Note (GEGN8615 Issue One) says: <i>G2.2.6 There is no information on what is considered a ‘moderate’ or a ‘steep’ gradient for a ramp in this context. The DfT document ‘Inclusive mobility’ guidance advises that ‘...an 8% (1 in 12) slope is the maximum that may be used; anything greater than this will cause difficulties for manual wheelchair users ... 5% (1 in 20) is preferred.’ It also states that ‘Steeper gradients than these can be managed by some wheelchair users, but only over very short distances (1000 mm or less) ... Even over these short distances the maximum gradient used should be no more than 10% (1 in 10). As a general rule, however, 8% (1 in 12) should be used as the absolute maximum.’</i> <i>G2.2.7 The ERA Application Guide refers to ISO 21542:2011 section 8.2 and Tables 2 and 3 for possible information on ramps. Table 2 gives the maximum gradient of a slope for a range of lengths and the values are consistent with the figures above.</i>
15	7	Is there any further guidance on what defines a moderate/ steep gradient?		NC	20	4.2.1.2.2 (3)	Please see the response to comment 14.

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16	8	The reduced ramp width should be a mandatory minimum requirement as the requirement is ambiguous and open to interpretation. The ramp width should be measured between handrails and not be measured at the floor surface.	Change to “..., ramps may shall have a minimum width of 120 cm measured at floor surface between handrails.”	DC	20	4.2.1.2.2 (3a)	Changed to remove the proposed 4.2.1.2.2 (3a) from the NTSN; that is, to not add a reduced minimum width for ramp width and keep this the same width as the rest of the obstacle-free route. It was reconsidered that 120 cm was not appropriate when considered alongside BS 8300-1 which sets a minimum width for ramps of 150 cm, but that there was no clear case to allow a minimum width of 150 cm compared to the minimum width of 160 cm for the rest of the obstacle-free route.
17	4	Ramp width – It is suggested that RSSB, further review whether the proposed approach could be improved. It is difficult to offer a balanced view on what the best option might be given “either width of 120 cm or 150 cm is insufficient for two wheelchair users to pass”. DPTAC would welcome the opportunity to further discuss this aspect with RSSB in order to identify possible improvements.		DC	20	4.2.1.2.2 (3a)	Please see the response to comment 16.
18	2	Comment from Steven Maslin of AtkinsRéalis: Required ramp width of 120cm. This is less than the building regulations which is 1500mm and doesn't factor in the need for overtaking places or taking account of volume of movement	Consider applying the building regulations ramp width requirement.	DC	20	4.2.1.2.2 (3a)	Please see the response to comment 16.
19	9	Typo	Typo - Stairs of two steps 'of' more... should be 2 steps 'or' more	DC	20	4.2.1.2.2 (4)	Corrected
20	2	Comment from Steven Maslin of AtkinsRéalis: Comment regarding the use of Type 1 lifts for station upgrades or renewals only.	A note or sentence is needed to state that this is to be discouraged and is not automatically permitted and that lift size needs to be substantiated according to expected use	NC	20	4.2.1.2.2 (5)	Thanks for raising this issue, but as this proposal is not related to a change made to the TSI or a change proposed through the consultation to address an existing issue with the NTSN it is outside the scope of this revision and is proposed to be added to the NTSN issues log for discussion and resolution in a future revision of the NTSN or guidance.
21	2	Comment from Steven Maslin of AtkinsRéalis: Comment regarding use of level track crossings as part of obstacle free route.	A sentence needs to indicate that this is discouraged and is not automatically permitted.	NC	21	4.2.1.2.2 (7)	Thanks for raising this issue, but as this proposal is not related to a change made to the TSI or a change proposed through the consultation to address an existing issue with the NTSN it is outside the scope of this revision and is proposed to be added to the NTSN issues log for discussion and resolution in a future revision of the NTSN or guidance.

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22	4	<p>Wayfinding tactiles – DPTAC suggest RSSB seek the views of RNIB and Guide Dogs in respect of this component. DPTAC especially welcome the proposal from RSSB to pursue a “...long-term intention for wayfinding for visually impaired people is for there to remain a relatively high-level and clear requirement in the PRM NTSN (or equivalent document) to safeguard the requirement to provide wayfinding for visually impaired people. Then the supporting, detailed requirements to ensure consistent and suitable solutions are delivered will be contained in supporting standards or guidance. These need further research and work to deliver. Once these standards are in place, this NTSN requirement will need to be revised, either to reference these or ensure consistency with it.” Moving forward, DPTAC would also welcome the opportunity to further discuss this aspect with RSSB in order to identify possible improvements.</p>		NC	21	4.2.1.2.3	<p>Tactile wayfinding requirements proposed are being retained, with some flexibility added through new points 2a) and 2b). RNIB and Guide Dogs responded to the 2021 consultation on this topic and responded strongly in favour of retaining physical tactile wayfinding requirements and extending the requirements to apply more widely.</p> <p>Relevant excerpts from the RNIB response are as follows: <i>Consistent wayfinding systems are an essential part of making stations accessible for people with sight loss...</i> <i>Tactile, audio and visual wayfinding systems are vital for blind and partially sighted people to locate key points of interest in a station, including platforms, ticket desks, stairs and lifts, accessible toilets and help desks.</i> <i>In addition, digital wayfinding systems can help some blind and partially to navigate a station’s environment more easily.... It is critical, however, that physical methods of wayfinding are not abandoned to digital, to avoid digitally excluded people being unable to navigate a station safely and independently. Blind and partially sighted people are disproportionately more likely to be digitally excluded than the general population, and RNIB strongly maintains that digital wayfinding systems should never be used as a replacement for physical wayfinding systems.</i></p> <p><i>On social media, we also asked blind and partially sighted people about their views on wayfinding at stations: “Consistency in the layout of railway stations, so that you know that things like tactile indicators on the floor that you would find in one train station would be used in the same way in every other train station you might encounter.” “It is very important for visually impaired people when travelling and navigating an unknown station to have some wayfinding points that are universally known, for example tactile markings on the floor, so that you can navigate yourself to a known destination. This would also cut down on staff at the station because we could be more independent finding our own way to the helpdesk etc.”</i> ... <i>In the third objective we object to technical solutions being used as a replacement. Blind and partially sighted people are disproportionately more likely to be digitally excluded than the general population. We strongly recommend digital wayfinding systems should only be introduced in addition to physical wayfinding systems.</i></p>

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23	10	<p>We support 4.2.1.2.3 (screenshot below) in its entirety provided the comments in margin are added.</p> <p>We note this section includes the following comments in the margin from TSI text which we agree with: -</p> <p>We have read this clause such that items 2a and 2b above will be added to the proposed NTSN, but it appears they might not be.</p> <p>Para 2a and 2b from the TSI should be re-instated and adopted in the new version of the NTSN; reason is to ensure tactile wayfinding is not provided where it is not needed due to other features being present as described.</p> <p>Please ensure these points are included in the revised NTSN.</p>	Ensure the NTSN has these items added	DC	21	4.2.1.2.3	Revised to add points 2a) and 2b) from the PRM TSI to the PRM NTSN (the comments in the margin this refers to).
24	10	I fully support the changes to the obstacle free route provided the comments in the margin are included. This is the third consultation on that proposal and every time the industry has supported it.		DC	21	4.2.1.2	Please see the response to comment 23.
25	8	The current requirement is not interpreted the same way by project teams with some projects providing continuous tactile and contrasting walking surface indicators for the full length of the obstacle-free routes as intended with other projects only providing minimal lengths of tactile and contrasting walking surface indicators mainly at changes in direction with large gaps in the obstacle-free routes with no tactile and contrasting walking surface indicators provided. The justification used by these projects is that some standards permit the use of cues such as walls and fencing and that the DfT Guidance on the Use of Tactile Paving Surfaces dated December 2021 does not explicitly state that tactile and contrasting walking surface indicators are required to be continuous, although it is reasonably inferred.	Change to “Information on the obstacle-free route shall be given to visually impaired people by continuous tactile and contrasting walking surface indicators as a minimum.”	NC	21	4.2.1.2.3 (2)	Not added due to possible conflict with the revision to add points 2a) and 2b) from the PRM TSI, which allows tactile surfaces to be omitted when the route is indicated unambiguously by built or natural elements, which means this may not be continuous. There remains a need for this requirement to be supported by guidance to address challenges with implementation.
26	2	Comment from Steven Maslin of AtkinsRéalis: This is hugely contentious and problematic for within a station and especially on platforms. Moreover, it is more relevant between arrival point and station entrances where there is no obvious detectable edges and navigation aid.	This should no longer be a hard and fast requirement.	DC	21	4.2.1.2.3 (2)	Revised to add points 2a) and 2b) from the PRM TSI to the PRM NTSN which provides further flexibility.
27	11	“or telephone applications” the term telephone can be seen as limiting the potential innovations and exclude some other type of devices for example smart cane.	It is suggested to replace telephone by smart device in the wording of the requirement.	NC	21	4.2.1.2.3 (3)	Thanks for raising this issue, but as this proposal needs further discussion and is not related to a change made to the TSI or a change proposed through the consultation to address an existing issue with the NTSN it is outside the scope of this revision and is proposed to be added to the NTSN issues log for discussion and resolution in a future revision of the NTSN or guidance.

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28	11	<p>(3) considers that alternative solution to tactile can be implemented so the argument used in the business case for change not to modify the existing wording to keep a consistent approach is not correct.</p> <p>It is also necessary to recognise that the industry is moving more and more towards digitalised solutions and the need to systematically have to go through an innovative solution can be seen as a bureaucratic hurdles which stifles innovation. Having said that innovation needs to be introduced in a controlled way with the full support of all stakeholders. The proposed approach will reduce costs as it will remove the need for innovative solutions application to the DfT without lowering the level of justification of the acceptability of the solution.</p>	<p>It is suggested that the end of (3) is reworded as follow:</p> <p>When they are intended to be used as an alternative, they shall be treated as innovative solutions mutually agreed by the project entity, all the passenger service operators that use the station, and the Disabled Persons Transport Advisory Committee (DPTAC) as a minimum. A letter setting out details of the agreed solution, the consultations carried out, and signed by the aforementioned parties, shall be included in the technical file.</p>	NC	21	4.2.1.2.3 (3)	<p>Thanks for raising this issue, but as this proposal needs further discussion and is not related to a change made to the TSI or a change proposed through the consultation to address an existing issue with the NTSN it is outside the scope of this revision and is proposed to be added to the NTSN issues log for discussion and resolution in a future revision of the NTSN or guidance.</p> <p>The comment recognises the need for different solutions to be introduced in a controlled way and the current requirement of an innovative solution means this is agreed in a consistent way for all projects. Though it is a sensible proposal that this should be agreed by the project entity, operators using the station and DPTAC, more consideration is needed of, for example, whether this is a suitable minimum level of consultation, the capacity of DPTAC to agree this for all stations, and escalation in case of disagreements.</p>
29	12	<p>In the PRM NTSN I have a query about wayfinding. In European stations they have lots of tiles which crisscross and take partial sighted persons to their destination. Examples are Paris Est and Zurich Hbf. I don't see these much in GB stations. Is there a reluctance or a decision not to do this? See photos</p> <p>Also how do users know what the different tactile shapes mean? Bobbles, lines etc. Is there a guidance document?</p> <p>At Zurich Hbf at the buffer stop end is a stainless steel barrier. On this is a platform number in Arabic and braille. Last week I saw a couple of people use it. (see photo). Another person was struggling to decide which way was to an ascending platform number. Is there a code for this in GB?</p>		NC	21	4.2.1.2.3	<p>There is a recognised need in GB to support the implementation of the NTSN requirement for tactile wayfinding with guidance. RSSB and NR are undertaking work to improve supporting standards and guidance in this area.</p>
30	5	<p>We support 4.2.1.2.3 in its entirety provided the comments in margin are added. We note this section includes the following comments in the margin from TSI text which we agree with: -</p> <p>We have read this clause such that items 2a and 2b above will be added to the proposed NTSN, but it appears they might not be.</p>	<p>Para 2a and 2b from the TSI should be re-instated and adopted in the new version of the NTSN; reason is to ensure tactile wayfinding is not provided where it is not needed due to other features being present as described.</p> <p>Please ensure these points are included in the revised NTSN.</p>	DC	21	4.2.1.2.3	<p>Revised to add points 2a) and 2b) from the PRM TSI to the PRM NTSN.</p>

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31	5	<p>The current NTSN wording around tactile wayfinding is not providing consistent deployment for users.</p> <p>We note that the current DfT code of practice is using the wording of a superseded PRM TSI and that we have highlighted this in the joint RSSB and NR comments provided to the DfT consultation on this CoP document on 1 December 2023.</p> <p>Referenced standards used by projects e.g. DfT CoP document allow 'traditional cues' to be used which are then consistent with wider public realm. Removing proposed TSI wording implies that this approach is no longer acceptable, introducing cost and complexity.</p>	<p>Proposed TSI wording 2(b) is retained as this is being implemented in practice or proposed wording used with clarification that a 'traditional cue' can also be and edge or surface followed visually or tactually.</p> <p>Provide clear guidance and advice on what technical solutions are acceptable for tactile wayfinding to demonstrate best practice to achieve the requirements of the NTSN in general as well providing clear examples of what are currently considered innovative solution (cl 3).</p> <p>As the RSSB are aware Network Rail are developing a Design Manual for tactile wayfinding and we welcome the continued input from the RSSB into this document.</p> <p>We welcome the approach outlined in the Arup's report developed with NR and the RSSB 'A New Framework for Rail Station Design Standards and Guidance' which includes the need for a new RSSB standard for Wayfinding.</p> <p>The DfT CoP we consider needs reform and NR and RSSB have worked jointly together backed up by Arup's expertise to produce a 'New Framework for Rail Station Design Standards and Guidance'. This proposed revision has identified an opportunity to align and rationalise standards and guidance relating to accessible railway stations and the sector is collectively, via RSSB, working towards a single position and codify it in relevant industry standards. We consider the approach proposed for a future revision presents opportunities to reduce costs, speed up infrastructure delivery, improve design quality and passenger experience and accessibility. This work would be facilitated by expert working groups, including community rail partners, to make best practice standard as per recommendation 44 of the Williams Review.</p>	DC	21	4.2.1.2.3	Revised to add points 2a) and 2b) from the PRM TSI to the PRM NTSN.

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32	5	The current approach does not allow a negotiated agreement with local accessibility groups to consider local feedback or situations.	<p>DfT and RSSB to review the feedback from the previous industry consultations held by the RSSB and DfT into tactile wayfinding and the DfT code of practice consultation and provide a clear and consistent position to the industry on the provision of tactile wayfinding considering inclusive design principles and based upon passenger feedback.</p> <p>This shall consider if the view from some project teams 'Remove requirement for tactile and contrasting walking route indicators as a minimum and include as a range of potential options to be considered by project along with stakeholders and deployed as a negotiated solution.' Is appropriate and reflects an inclusive and accessible approach.</p>	DC	21	4.2.1.2.3	<p>We are aware from this consultation, previous consultations and other engagement of the wide range of views about the suitability of the requirements and implementation of tactile surfaces for wayfinding in stations. There is no consensus on the removal of tactile wayfinding requirements or to include a range of possible options as an alternative.</p> <p>Based on this consultation, the NTSN is being revised to add point 2a) and 2b) from the PRM TSI to the PRM NTSN which add some flexibility into the requirement, while still preserving the overall requirement for tactile wayfinding. Work will continue work in this area either to support a further change to the requirement or to support implementation of the existing requirement.</p>
33	13	It is unclear why the NTSN retains the previous wording in respect of directional tactiles when the updated TSI revises the requirements, especially as RSSB GEGN8615 "Guidance on application of the NTSN states, in G2.2.10: It is acknowledged that the industry faces a difficult situation with the tactile wayfinding requirement given in clause 4.2.1.2.3 (2) of the PRM NTSN. The industry position, facilitated and led by RSSB, is that tactile surfaces or guiding people with visual impairments are best used following consultation with the intended end-users and other users who may be affected by the use of such surfaces. It is not good practice to install tactile wayfinding simply to apply the TSI and NTSN requirement in isolation, without considering risks, and other legislation and standards holistically.	Alignment	DC	21	4.2.1.2.3	Revised to add points 2a) and 2b) from the PRM TSI to the PRM NTSN.
34	14	Rail Partners supports keeping the original NTSN text. We agree with the reasoning that the prospective TSI would introduce further inconsistency across the network for wayfinding, meaning visually impaired people are faced with trying to understand which wayfinding approach has been adopted. It is therefore important the railway keeps harmony with other transport areas, such as buses and trams.	Maintain the NTSN in its current form, but recognise other interest groups may have improvements.	DC	21	4.2.1.2.3	Due to the evidence provided through consultation and further discussions, there is a better understanding of the circumstances where the flexibility in point 2b) of the TSI would be beneficial, so this is being added to the NTSN to remove the need to seek exemptions in these cases
35	2	Comment from Steven Maslin of AtkinsRéalis: This provision has been questioned in that it places someone who is reading the braille/ tactile information in a place of circulation which is not particularly practical.		NC	21	4.2.1.2.3 (4)	Thanks for raising this issue, but as this proposal needs further discussion and is not related to a change made to the TSI or a change proposed through the consultation to address an existing issue with the NTSN it is outside the scope of this revision and is proposed to be added to the NTSN issues log for discussion and resolution in a future revision of the NTSN or guidance.

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36	1	It is not clear why “station buildings” is specifically used under this clause, and “station buildings” are not defined or explained in the NTSN, ERA Guide or RSSB recent PRM NTSN Guidance GEGN8615. We noticed that there is variation in terms of interpretation of “station buildings” definition under the clause 4.2.1.4 (2) among independent assessors.	Our understanding is that this requirement is to avoid trip hazards and also to support PRM users mobilising around the station. We think this requirement should be applied throughout the station confines (i.e. all areas within station as an infrastructure subsystem). It would be clearer to clarify the definition of “station buildings” in the coming NTSN revision.	NC	22	4.2.1.4	Thanks for raising this issue, agree that further guidance should be considered for the forthcoming update to the PRM NTSN guidance note.
37	2	Comment from Steven Maslin of AtkinsRéalis: Point made about barrier matting earlier (comment #4) is perhaps most relevant here.		NC	22	4.2.1.4 (1)	Thanks for raising this issue, but as this proposal needs further discussion and is not related to a change made to the TSI or a change proposed through the consultation to address an existing issue with the NTSN it is outside the scope of this revision and is proposed to be added to the NTSN issues log for discussion and resolution in a future revision of the NTSN or guidance.
38	2	Comment from Steven Maslin of AtkinsRéalis: Comment regarding irregularities.	Irregularities in the form of thresholds and especially drainage channels should be discouraged!	NC	22	4.2.1.4 (2)	Thanks for raising this issue, but as this proposal needs further discussion and is not related to a change made to the TSI or a change proposed through the consultation to address an existing issue with the NTSN it is outside the scope of this revision and is proposed to be added to the NTSN issues log for discussion and resolution in a future revision of the NTSN or guidance.
39	3	Nappy changing	Good addition.	NC	22	4.2.1.6	Noted
40	6	Should this be gender neutral?		DC	22	4.2.1.6(2)	Revised ' <i>men and women wheelchair users</i> ' to ' <i>any wheelchair user</i> '
41	4	Nappy changing facilities – DPTAC agree with RSSB reasoning to review this component. A suggestion is made that RSSB consider seeking the views of Mumsnet with regards to this aspect. DPTAC agree with RSSB reasoning to review this component.		NC	22	4.2.1.6 (2)	Noted
42	2	Comment from Steven Maslin of AtkinsRéalis: Typo?	Add 'and' before 'wheelchair users'.	NC	22	4.2.1.6 (2)	This is not a typo - it is the same wording as in the TSI that requires it to be accessible to male wheelchair users and female wheelchair users.
43	4	Manual sales counters/information desks and TVMs – DPTAC agree with RSSB qualitative reasoning with regards to this component.		NC	23	4.2.1.8	Noted
44	5	The NR TA have received the comment below from one of our project teams: For the majority of stations, the proposed text will be acceptable as there will generally be limited numbers of facilities and a clearly defined way through the station, the obstacle free route is defined. For complex stations is there a risk that the choice and definition of the obstacle free route becomes more complex and starts to affect delivery of other accessibility measures like tactile wayfinding as the number of options available to users increases, or risk increases as users may attempt to access facilities not fully aligned to their needs.	The NR TA have received the proposed suggestion below from one of our project teams: Assess impact on other definitions of the obstacle free route and facilities required to assess the impact and continued suitability of proposed wording. Perhaps a clarification needs to be made about having accessible facilities where ultimately they are accessible for different types of users, if in a restricted location then no expectation. Though with competent design of new facilities this should not be a factor and accessible facilities would be throughout the location.	NC	23	4.2.1.8	The intent of the change is a clarification, so if further clarification is required, propose that this is done through guidance which can include more detail.

No	Respondent	Comment	Suggestion	Way forward	Page	Clause	Response
45	2	Comment from Steven Maslin of AtkinsRéalis: No mention has been made of a pressing issue associated with disability glare caused by some types and positions of light fittings.	Suggest that one is added.	NC	23	4.2.1.9	Thanks for raising this issue, but as this proposal needs further discussion and is not related to a change made to the TSI or a change proposed through the consultation to address an existing issue with the NTSN it is outside the scope of this revision and is proposed to be added to the NTSN issues log for discussion and resolution in a future revision of the NTSN or guidance.
46	3	Height of info	Support this	NC	24	4.2.1.10	Noted
47	4	Train departure information – DPTAC agree with RSSB reasoning in respect of this component. A suggestion is made to design and undertake a practical testing exercise to ascertain what an optimised siting of this information would be of most benefit to passengers.		NC	24	4.2.1.10	Noted
48	5	A NR Project team have highlighted that the proposed wording does not allow alternate scenarios where users are directed to other sources of information using QR codes on posters or a user help point is available. This situation already exists throughout Scotland. The intent of the proposed modification does not probably improve the situation. The proposed wording does not recognise that most users at 160cm reading height would be able to read conventional CIS displays located at high level.	The NR TA have received the proposed suggestion below from one of our project teams: Proposed update to recognise that modern sources of information are available to users, so the classic timetable poster is not necessary and is maintaining cost into the industry for upkeep. Align with Accessible Stations code of Practice which just states 'Information concerning the departure of trains.' The NR TA suggest a review is undertaken to provide a clear and consistent position to the industry considering inclusive design principles and based upon passenger feedback.	NC	24	4.2.1.10	This requirement does not prevent additional sources of information being provided, but the proposal to remove the need to provide train departure information being provided in stations needs further discussion and is outside the scope of this revision. As such, it is proposed to be added to the NTSN issues log for discussion and resolution in a future revision of the NTSN. The proposal for 160 cm height allows people to be much closer to the information than high level displays.
49	11	The removal of displays as IC and the inclusion of the requirements from 5.3.1.1 to 4.2.1.10 is seen as a positive change which is fully supported by HS2.		NC	25, 58	4.2.1.10, 5.3.1.1	Noted
50	6	Text mentions horizontal or vertical scrolling displays but only details a minimum scroll rate for horizontal movement. Should a scroll rate be included for vertical movement?		NC	25	4.2.1.10.(14)	This has not previously been raised as an issue with the TSI or NTSN, and it is unclear from the comment whether there is an issue with omitting a requirement for vertical movement
51	15	Spoken information – point 4.2.1.11 – is this just for stations or is it for trains? Noted there is still a conflict on PA and PIS volume levels vs noise regulations for train crew / station workers which can be difficult to navigate – consideration on guidance may be given e.g. we have aimed for 80dB at head height to give good clarity whilst not being too loud for train crew.		NC	25	4.2.1.11	The revised requirement is just for stations rather than rolling stock. There is a need to further understand the challenges for rolling stock which might be different from infrastructure, so as this does not relate to a proposed change for rolling stock or proposed TSI change, this will be added to the NTSN issues log for further consideration.
52	4	Spoken information – ambiguity regarding calculation of minimum STI requirements - DPTAC understand the RSSB quantitative reasoning here. A suggestion is made to seek the views of RNID to ascertain whether there might be any scope for improving this aspect with regards to D/deaf passengers. DPTAC would welcome further discussions in respect of this component moving forward.		NC	25	4.2.1.11	Noted. Consideration of further improvements to quality of spoken information is not within the scope of this work, but RNID and DPTAC will be included in any further consideration.

No	Respondent	Comment	Suggestion	Way forward	Page	Clause	Response
53	2	Comment from Chris Hales of AtkinsRéalis: We agree with the clarification on the assessment of STI / STIPA as this has caused confusion on several projects.	It is assumed that this text is specifically referring to the public address (PA) informational announcements, but it is not stated as such - this should be clarified. N.B. This paragraph should also be updated for the rolling stock PA system (section 4.2.2.7.4). It would also be worth considering the requirements for speech intelligibility at other customer interfaces such as ticket office counters, where a high(er) standard of audibility and intelligibility should be provided, whether for person to person, unamplified speech, or amplified audio via a speech transfer system.	DC	25	4.2.1.11	This clarification that it applies to PA systems in stations appears to be an omission in the PRM TSI and application guide, and the PRM NTSN and application guide. Addressed by adding ' <i>Public address system spoken information shall have...</i> ' to 4.2.1.11 Further changes to requirements for speech intelligibility at other customer interfaces are outside of the scope of this revision, but will be added to the NTSN issues log for further consideration.
54	4	Free space to allow boarding aids – DPTAC agree with this RSSB qualitative reasoning.		NC	25	4.2.1.12., 4.4.3	Noted
55	13	It is not clear why Point 4.2.1.12 (5) is retained. It is now duplicated by Point 4.4.3 (e).	Deletion	NC	25	4.2.1.12	Section 4.2 is for technical requirements and section 4.4 is for operational requirements. This is considered to be both a technical and operational requirement and deleting from 4.2.1.12 (5) has a risk that free space requirements are not taken into account in the design, so the location of the current requirement in 4.2.1.12 (5) should be kept. However, it was considered useful to include in the ' <i>Provision of boarding aids and provision of assistance</i> ' section so that it is not overlooked by IMs/RUs.
56	4	Clarifying requirements for minimum platform width - DPTAC agree with this RSSB qualitative reasoning.		NC	26	4.2.1.12 (3) (4)	Noted
57	11	The GB NTR in relation to platform width is not applicable to the HS2 infrastructure or other non GB mainline infrastructure. This proposed change will negatively impact the HS2 project as it will delay the compliance assessment of the stations which are completing their detailed design. This change introduces additional cost to the HS2 project and therefore the assessment of costs/benefits on page 43 of the business case for change is incorrect. Other non GB mainline railways might also be negatively impacted by this change as they will need to develop their own NTRs.	Keep the TSI text with a note that a NTR exist for GB mainline (as it is done on NTSN INF)	NC	26	4.2.1.12 (3) (4)	No change to the NTSN proposals but note added to the BCfC that HS2 would require a specific case (to include the requirements in the current 4.2.1.12 as per the TSI).
58	8	The definition of the danger area (1) should be deleted as it is not used in the UK or in the NTR. The obstacles (4) paragraph and Table 4 should be deleted as the NTR (GIRT7020) includes requirements which address specific site constraints including obstacles. This would avoid duplication of design compliance and DeBo assessment as only the NTR and not the NTSN would require consideration.	Delete 4.2.1.12 (1) "The danger area of a platform commences at the rail side edge of the platform and is defined as the area where passengers are not allowed to stand when trains are passing or arriving." Delete 4.2.1.12 (4) and Table 4 and replace with "It is permitted to have obstacles on the platform as set out in National Technical Rules."	DC	25 , 26	4.2.1.12 (1) and (4), table 4	4.2.1.12 (1) and 4.2.1.12 (4) deleted, and 4.2.1.12 (4) replaced with ' <i>It is permitted to have obstacles on the platform as set out in National Technical Rules</i> ' as per the suggestion.

No	Respondent	Comment	Suggestion	Way forward	Page	Clause	Response
59	5	<p>The NR TA have received the comment below from one of our project teams: If the danger area is not specifically defined how can Clause (4) be demonstrated along with the table that defines a distance to the danger area.</p> <p>There is a risk that this will be interpreted as all obstacles are outside the defined platform with in the NTR which is likely not possible for double faced platforms.</p>	<p>The NR TA have received the proposed suggestion below from one of our project teams:</p> <p>Change danger area term for something that aligns with NTR.</p>	DC	26	4.2.1.12 (3), (4)	Please see the response to comment 58.
60	11	<p>The GB NTR in relation to platform width is not applicable to the HS2 infrastructure or other non GB mainline infrastructure. This proposed change will negatively impact the HS2 project as it will delay the compliance assessment of the stations which are completing their detailed design.</p> <p>This change introduces additional cost to the HS2 project and therefore the assessment of costs/benefits on page 46 of the business case for change is incorrect.</p> <p>Other non GB mainline railways might also be negatively impacted by this change as they will need to develop their own NTRs.</p>	Keep the TSI text with a note that a NTR exist for GB mainline (as it is done on NTSN INF)	NC	26	4.2.1.12 (6) (7) (8) (9)	Please see the response to comment 57.
61	4	Marking the danger area/platform edge – DPTAC have a concern that whilst it appears that it is being proposed that the tactile paving is always the same distance from the platform edge in order to assist a visually impaired person understand how far they are from the platform edge, the yellow safety line might be moved further away from the edge of the platform at stations on lines served by high-speed trains. This could mean that people with visual impairments may be standing or walking closer to the platform edge than other travellers, and may potentially suffer from the effects of turbulence from passing trains which they may not be aware are approaching, which in turn could put them at risk. DPTAC would welcome the opportunity to further discuss this aspect with relevant Industry partners.		NC	26	4.2.1.12 (6)	This has been considered in RIS-7016-INS Issue 2 where this requirement is set out. There is necessarily a trade-off between consistency in distance from the platform edge and consistency across all platforms with different characteristics. The evidence in RSSB research report T1118 and the RAIB Eden Park report from RSSB’s safety risk model (SRM) which underpin the standard suggest the overall risk is reduced with the current requirements. But RSSB research T118 concluded that platform markings are a ‘weak control measure’ which cannot ensure 100% compliance in keeping passengers away from the platform edge while waiting. Therefore, they should be used in conjunction with other methods which promote compliance. RIS-7016 recognises that and sets out measures such as staff help or real time targeted announcements. We would be happy to discuss further concerns with the existing requirements in RIS-7016-INS Issue 2.
62	4	Reference 11 – DPTAC would welcome further discussion with RSSB in terms of the safety aspects of level crossings aspect of step free routes within stations.		NC	27	4.2.1.15.	Changes to level crossings used as step free routes within stations is not within the scope of this change, but in any related work, RSSB would be happy to speak with DPTAC regarding safety aspects.
63	12	Improvements to how priority seats are identified needs to be made. Many passengers don’t understand what they are for. Better signage and improved moquette are required. We mention this in the Key Train Requirements v7 document.	<p>In terms of priority seats there are a couple of photos in KTR of good seat covers, poorer ones are used by LUL where the seat cover just looks worn and faded.</p> <p>I agree that priority seat labels are required, and KTR shows an example of what we consider to be good. Vienna Metro also has some good examples, which show all groups covered. There are plenty of times when the reservation system goes down and apart from Eurostar and TGV type services, we don’t have exclusive reserved trains, yet,</p>	NC	29	4.2.2.1.2	Noted the agreement of the proposal that priority seat signage remains a requirement in all cases. Proposals to improve signage and seating are outside the scope of this NTSN revision, so will be added to the NTSN issues log for consideration in a future revision.

No	Respondent	Comment	Suggestion	Way forward	Page	Clause	Response
64	3	Priority seats not marked	Very much welcome retention of marking, would have had severe objection to removal, for exactly the reasons that are outlined in your business case.	NC	29	4.2.2.1.2.1	Noted
65	15	Is it down to operators to identify priority seats and priority passengers if there are no labels? Some priority passengers may not identify themselves when booking a seat? Some may not book a seat?	Noted the expectation is that most will retain labelling but it could be worth making this clearer?	NC	29	4.2.2.1.2.1	The current NTSN requirement (and proposed continued requirement) is that for all rolling stock within its scope (i.e. new/upgraded/renewed) priority seats need to continue to be physically signed, so priority seats will be labelled and there is no option to remove labelling.
66	4	Identifying priority seats – DPTAC agree with RSSB reasoning in respect of this component. A suggestion is made to ascertain whether any complaints have been made with regards to current Priority Seating approaches to ascertain whether these might offer any further considerations for improvement.		NC	29	4.2.2.1.2.1	Noted the agreement of the proposal that priority seat signage remains a requirement in all cases. Proposals to improve signage and seating are outside the scope of this NTSN revision, so will be added to the NTSN issues log for consideration in a future revision.
67	3	Door signals retained	Very supportive of this, particularly important for visually impaired passengers – it doesn't matter why the doors are closing, it just matters that they are!	NC	33	4.2.2.3.2	Noted
68	6	Recommend that the signal is given 2 seconds prior to the door opening to warn people that it is about to open. There is a risk that someone might be leaning on the door. The warning would then be aligned with 4.2.2.3.2(8)(c).		NC	33	4.2.2.3.2(8)(b)	The requirements for the door opening signal are not proposed to be changed and therefore this comment is not within the scope of this revision. The implications of this need further discussion and consideration and therefore this will be added to the NTSN issues log for consideration in a future revision of the NTSN.
69	6	Poorly worded sentence with 'visible' being used twice. Suggest the second use is change to 'viewable'.		NC	34	4.2.2.3.2(11)	The meaning of the requirement is clear from the wording, so as this is outside the scope of this revision, propose that the wording remains as per the current NTSN.
70	4	Signals for external door operation – Overall, DPTAC agree with RSSB reasoning in respect of this component. It is suggested that RSSB seek the views of RNIB and Guide Dogs to further explore whether any further scope for improvement might be considered here. Moving forward, DPTAC would also welcome the opportunity to further discuss this aspect with RSSB in order to identify possible improvements.		NC	34	4.2.2.3.2	Noted. Consideration of further improvements to signals for external door operation is not within the scope of this work, but RNIB, Guide Dogs and DPTAC will be included in any further consideration for possible improvements.
71	4	Displaying next stop - DPTAC agree with RSSB reasoning in respect of this component.		NC	39	4.2.2.7.3	Noted
72	15	What will the impact of table 5a have on the displays? Will you need different ones for different trains? If so this may be problematic and costly if a generic screen design cannot be used?		NC	39, 64	4.2.2.7.3, 5.3.2.7	It will have no impact as there is no change to current requirements - the new Table 5a in point 4.2.2.7.3 of the draft PRM NTSN is identical to the previous Table 13 in point 5.3.2.7 of the current PRM NTSN.
73	4	Dynamic displays - DPTAC agree with RSSB reasoning in respect of this component. A suggestion is made however, to seek views of RNIB on whether any further consideration might be given to improving on current standards.		NC	39	4.2.2.7.3	Noted. Consideration of further improvements to dynamic displays is not within the scope of this work, but RNIB will be included in any further consideration.
74	6	Text mentions horizontal or vertical scrolling displays but only details a minimum scroll rate for horizontal movement. Should a scroll rate be included for vertical movement?		NC	39	4.2.2.7.3(11)	This has not previously been raised as an issue with the TSI or NTSN, and it is unclear from the comment whether there is an issue with omitting a requirement for vertical movement.

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75	2	Comment from Chris Hales of AtkinsRéalis: Also see comment against 4.2.1.11 for the infrastructure side.	Paragraph to be updated in line with PRM NTSN requirement from Clause 4.2.1.11	NC	40	4.2.2.7.4	The revised requirement is just for stations rather than rolling stock. There is a need to further understand the challenges for rolling stock which might be different from infrastructure, so as this does not relate to a proposed change for rolling stock or proposed TSI change, this will be added to the NTSN issues log for further consideration.
76	15	Just to note in many instances this can be hard to achieve due to platform train interfaces and differences at locations.		NC	45	4.2.2.11.1	Noted
77	4	Step position for vehicle access and egress - DPTAC agree with this RSSB qualitative reasoning.		NC	45	4.2.2.11.1	Noted
78	4	Boarding aids – DPTAC do not anticipate that any significant adverse impact might be created by this amendment.		NC	46	4.2.2.12.1	Noted
79	4	Railway Undertaking policy for infrastructure - DPTAC agree with this RSSB qualitative reasoning.		NC	49	4.4.1	Noted
80	6	Suggest rewording to 'where every passenger seat location.... The light might located in the overhead panel and not integral to the seat.		NC	52	4.4.2.8	Suggest there is no change to the meaning or possible interpretation, so propose to keep text as proposed in consultation.
81	4	Lighting levels - DPTAC agree with this RSSB qualitative reasoning.		NC	52	4.4.2.8	Noted
82	6	Suggest the sentence is extended to include 'at the platform'. Station could be used in place of platform. The train may stop on the approach to the station and passenger will still wish to know the name of the next stop.		DC	53	4.4.2.12	Added 'at the station' to remove any ambiguity in the requirement.
83	15	Would the operator mandate how this is managed e.g. would the wheelchair user use the CfA to ask for a food order? What happens if the CfA is non talkback or if there are no traincrew?		NC	55	4.4.2.20	Yes, the requirement is for operators to have procedures that deliver the requirements for assistance, so this is for the operator to determine.
84	4	Services for wheelchair users – DPTAC understand that consideration needs to be given to meeting the needs of a disabled person who is unable to reach the buffet, and so requires refreshments to be brought to them, and to be able to communicate these requirements. From a DPTAC perspective, this therefore becomes a policy approach, and as such, DPTAC suggest that this needs to be factored into Accessible Travel Policies. DPTAC would welcome the opportunity to further discuss this aspect with relevant Industry partners.		NC	55	4.4.2.20	Point 4.4.2.1 of the PRM NTSN requires that the operator has a written policy (i.e. the ATP) which includes operating rules within section 4.4.2, so this addition to the NTSN means it would need to be part of the ATP.
85	6	Suggest rewording to 'Wheelchair users are provided assistance to reach the services free of charge'.		NC	55	4.4.2.20(a)	No change to meaning or possible interpretation, so text kept as proposed in consultation.
86	6	Suggest rewording to 'the service is delivered to wheelchair users at the wheelchair spaces free of charge,.....'		NC	55	4.4.2.20(b)	No change to meaning or possible interpretation, so text kept as proposed in consultation.
87	5	OPERATING RULES A GB-focused analysis is required. Operating rules are a license condition. and are regulated by the ORR. There is no apparent benefit for these to be independently reviewed by an approval body.	Delete clause or permit self-assessment.	NC	48-56	4.4	Point 4.4. in the PRM NTSN states 'The following operating rules do not form part of the assessment of subsystems' and point 6.2.6 in the PRM NTSN states 'For the purpose of this NTSN, the approved body shall not verify any operational rule, even if they are listed in point 4.4.' so there is no need for independent assessment and therefore no need to remove this clause.

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88	5	<p>4.5. MAINTENANCE RULES</p> <p>A GB-focused analysis is required. Maintenance rules are a license condition, and are regulated by the ORR. There is no apparent benefit for these to be independently reviewed by an approval body on a project-by-project basis.</p> <p>Historically, Approval Bodies have reviewed NR standard portfolio for Electrification projects.</p>	Delete clause or permit self-assessment.	NC	56	4.5	Point 6.2.5 in the PRM NTSN states ' <i>The approved body shall verify only that the documentation requested for operation and maintenance, as defined in point 4.5 of this NTSN, is provided. The approved body is not required to verify the information contained in the documentation provided</i> ' so there is no need for independent assessment and therefore no need to remove this clause.
89	5	<p>PROFESSIONAL QUALIFICATIONS</p> <p>A GB-focused analysis is required. A Health and Safety management system is a licensed condition, and these documents the Professional Qualifications required for key posts and are regulated by the ORR. There is no apparent benefit for these to be independently reviewed by an approval body on a project-by-project basis.</p>	Delete clause or permit self-assessment.	NC	57	4.6	Professional training requirements in the PRM NTSN are to include disability and awareness and equality so may not be covered by Health and Safety management systems, and therefore should be kept as requirements. But agree that this should not need to be externally reviewed by an ApBo and if there is any uncertainty about this, it can be clarified through guidance.
90	5	<p>4.7. HEALTH AND SAFETY CONDITIONS</p> <p>A GB-focused analysis is required. Compliance with legislation is a given. There is no apparent benefit for these to be independently reviewed by an approval body on a project-by-project basis.</p>	Delete clause or permit self-assessment.	NC	57	4.7	Point 4.7 in the PRM NTSN contains no requirements, therefore there is nothing to assess.
91	4	Infrastructure and rolling stock registers - DPTAC agree with this RSSB qualitative reasoning.		NC	57	4.8	Noted
92	3	Boarding and alighting -stability of platform ramps	This has created difficulties in Scotland. You should be aware that the lack of fixed-point ramps in Scotland has led to a reduction in the number of stations where ramp access is available as Scotrail has had to replace a single generic ramp at each station with 5 different ones for different rolling stock.	NC	59	5.3.1.2, 5.3.1.3	This issue has been raised at mirror group discussions and the intent of the proposed NTSN change to 5.3.1.2 is to help address this.
93	15	Platform ramps – securing to vehicle. Has any thought been given on methods of security and what is acceptable? It is an area that causes a lot of discussion and can also affect traincrew manual handling.		NC	59	5.3.1.2, 5.3.1.3	The NTSN proposal goes further than the TSI change in seeking to address this by clarifying that it needs to be secured to the vehicle (rather than just in a 'stable position'). Given the focus, this may be an area where further clarification is needed through separate guidance to the NTSN.
94	4	Platform ramp and lift stability – DPTAC agree with the RSSB qualitative reasoning. It is suggested however, a future discussion takes place with DPTAC to ascertain whether any improvements could be made in terms of the unclear 'stable position' aspect might mean from a disabled passenger perspective.		NC	59	5.3.1.2, 5.3.1.3	Noted the agreement of the proposal. Proposals for further improvement are outside the scope of this NTSN revision, so will be added to the NTSN issues log for consideration in a future revision, and DPTAC will be included in any further consideration.
95	3	Toilet door signals	Support this and clearer specified in this way.	NC	61	5.3.2.2	Noted

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96	11	<p>“The force required to open or close a manual door shall not exceed 60 N.”</p> <p>Whilst this requirement is for the rolling stock. It must be noted that BS 8300-2:2018 Design of an accessible and inclusive built environment Part 2: Buildings — Code of practice, section 8.4.2 Controlled door closing devices provide guidance on forces which seems to not align with the 60N from the requirement: “For many people to have independent access through single or double swing doors, the opening force, when measured at the leading edge of the door, should be not more than 30 N from 0° (the door in the closed position) to 30° open, and not more than 22.5 N from 30° to 60° of the opening cycle.”</p>	Review the 60N and ensure that it is in line with accessibility requirements and standards	NC	61	5.3.2.2 (9)	This is an interesting point, but the proposed requirement is the same as the existing requirement for interior doors, and we are not aware of any issues with this. Proposed that 60N is kept for consistency with existing requirements, but this will be added to the issues log for further discussion to understand if there have been any issues with this.
97	4	Toilet doors - DPTAC agree with RSSB reasoning in respect of this component. It would however, be useful for RSSB to understand whether any passenger complaints have been made with regards to this aspect. This may prove useful in terms of any further considerations in terms of this aspect moving forward.		NC	61	5.3.2.2	Noted. Consideration of further improvements is not within the scope of this work, but passenger complaints will be part of any further consideration.
98	15	Is yellow the best colour? This will depend on where the sign is sited (colour) and will also differ / be inconsistent from existing trains with green signage (which I think there are a significant number of)?		NC	63	5.3.2.6	<p>To address the concern of the yellow not being appropriate with surrounding colours, Figure B.5 in EN 16584-2 (which is the requirement referred to in the revised NTSN for call for aid device designs) has different options of a yellow exterior with white interior or yellow interior with white exterior so that this can contrast with the surrounding colour.</p> <p>If the requirement is not revised, there will still be an inconsistency with some call for aid devices being green and some being yellow, but by removing the option in the NTSN to have a green call for aid device and aligning this with the BS EN, this means that over time as rolling stock is replaced the designs will be consistent.</p>
99	4	Colour for call for aid devices - DPTAC agree with RSSB reasoning in respect of this component. One point which DPTAC do believe would merit further exploration with regards to 4.3 relates to a question of how well do current call for aid devices meet the needs of D/deaf passengers? A suggestion is therefore made to seek the views of RNIB in respect of this element.” DPTAC would welcome the opportunity to further discuss this aspect with RSSB in order to identify possible improvements.		NC	63	5.3.2.6	Noted. Consideration of further improvements to call for aid devices is not within the scope of this work, but RNID and DPTAC will be included in any further consideration.
100	6	This is a very wordy sentence. Suggest rewording to ‘Modules CA1, CA2 or CH may be used only in the case of products manufactured in accordance with a design developed and already used to place products on the market before the application of relevant NTSNs or TSIs applicable to those products. This is dependent on the manufacturer demonstrating to the approved body that design review and type examination were performed for previous applications under comparable conditions, and are in conformity with the requirements of this NTSN. This demonstration shall be documented, and is considered as providing the same level of proof as module CB or design examination according to module CH1.’		NC	69	Table 15 Note (1)	No change to meaning or possible interpretation, so text kept as proposed in consultation.
101	4	Conformity assessment body on-site visits - DPTAC agree with this RSSB qualitative reasoning.		NC	70	6.2.1	Noted

No	Respondent	Comment	Suggestion	Way forward	Page	Clause	Response
102	5	The proposed wording is reinforcing assessment scope creep as the production phase check in Table E1 states that it is only required if the realization differs from the design.	Document to encourage the intent of Table E1 rather than enforcing the opinions of ApBos that a site inspection is always required at cost to assessment.	NC	70	6.2.1	The new text in 6.2.1 is consistent with the proposed change to Table E.1 that removes the footnote so that inspection is always required.
103	4	Assessment of contrast for rolling stock - DPTAC agree with this RSSB qualitative reasoning.		NC	71	6.2.3.3	Noted
104	4	Responsibility for compiling the technical file - DPTAC agree with this RSSB qualitative reasoning.		NC	72	6.2.5	Noted
105	4	NTSN application to new infrastructure - DPTAC agree with this RSSB qualitative reasoning.		NC	73, 74	7.1.1	Noted
106	5	The NR TA have received the comment below from one of our project teams: Consultation is encouraged however if technical solutions or requirements are always rigidly enforced there is little scope for manoeuvre within the consultation except for protracted regulation decisions. The Department is now stating that exemption decisions cannot be processed once construction is underway so there is a danger of projects undertaking consultation in good faith, achieving a solution, and then having an exemption request refused.	The NR TA have received the proposed suggestion below from one of our project teams: Align requirement for consultation with the ability to flex accessibility facilities provided in a positive and negative way. The NR TA suggest a review is undertaken to provide a clear and consistent position to the industry considering inclusive design principles and based upon passenger feedback.	NC	73, 74	7.1.1	Consultation still has value within the existing framework as the requirements in the NTSN are typically minimum requirements so there is flexibility to provide more/additional accessibility features, and if consultation results in proposals to do less than specified in NTSN requirements then that supports applications for exemptions to specific requirements.
107	4	New stations consultation regarding access - DPTAC agree with this RSSB qualitative reasoning. DPTAC also suggest that consideration is given to undertaking consultation with disabled peoples representatives and organisations local to new station infrastructure projects.		NC	73, 74	7.1.1	We note the agreement with the proposal and the suggestion that consideration is given to undertaking consultation with disabled people's representatives and organisations local to new station infrastructure projects will be considered for the forthcoming PRM NTSN guidance note.
108	4	New rolling stock (transition regimes) - DPTAC agree with this RSSB qualitative reasoning. DPTAC also note the proposal to apply a 7 year transition process in application of this component. A suggestion is therefore made for RSSB to consider a 1, 3 and 5 year review of whether this process is working as intended.		NC	74	7.1.2, Appendix P	Noted
109	4	Existing vehicles/types - DPTAC agree with this RSSB qualitative reasoning.		NC	77	7.2.3, Appendix F	Noted
110	4	Updates to referenced ENs - No DPTAC comment.		NC	79-82	Appendix A	Noted
111	8	ISO 7001:2007/Amd 4:2017 Graphical symbols — Public information symbols is withdrawn and has been replaced with BS ISO 7001:2023 Graphical symbols — Registered public information symbols	ISO 7001:2007/Amd 4:2017 Graphical symbols — Public information symbols BS ISO 7001:2023 Graphical symbols — Registered public information symbols	DC	81	Appendix A, Index 13	Updated within the NTSN to refer to the latest version of the standard ISO 7001:2023 (which does not affect the design requirements).
112	4	Site inspections - DPTAC agree with this RSSB qualitative reasoning.		NC	89	Appendix E	Noted
113	4	Access/egress steps requires Routine Test – DPTAC are not certain whether there might be an issue with this component in terms of the means by which “...appropriate testing for access/egress steps “ may apply at a practical level? Further clarity on this component would be helpful.		DC	89	Appendix E	Retain the current requirement not to have to do a routine test within production phase (i.e. no additional requirement) as the need to introduce this is unclear.

No	Respondent	Comment	Suggestion	Way forward	Page	Clause	Response
114	4	Door finding signal requirements - DPTAC suggest RSSB seek the views of RNIB and Guide Dogs in respect of this component to ascertain whether there may be any issues which may not have been identified. A suggestion is also made to seek views of RNID to ascertain whether there might be any issues for D/deaf passengers in respect of current audio solutions in this context.		NC	92-99	Appendix G	The proposal to keep the requirement for door opening signals means that door finding signals may be used in addition, but not in place of door opening signals, and therefore there the introduction of technical requirements for optional door finding signals should not result in any issues for deaf passengers.
115	15	Does this clarification change any measurements e.g. throughways, wheelchair spaces etc? (noted I have seen the height change)		NC	105	Appendix M	This clarification does not change any measurements other than the increase in height which is noted in the response.
116	4	Definition of an interoperable wheelchair – DPTAC recognise this aspect is a complex area. We are aware that research has been undertaken in respect of to what extent wheelchairs which are currently available are able to access / egress public transport. DPTAC therefore would welcome the opportunity to further discuss this aspect with RSSB to help clarify wheelchair access to services.		NC	105106	2.3, Appendix M	If there are issues with the current specification (the characteristics of which are not proposed to be changed in this revision, other than the height being increased from 1.375 metres to 1.45 metres), we would be happy to discuss further and add this to the issues log for recommendation for a future NTSN revision.
117	3	Wheelchairs increase size spec	Support. Likely to be an issue going forwards as mobility aids increase in size. Given the longevity of rail rolling stock this is maybe an issue that should be considered at this point in time.	NC	105106	2.3, Appendix M	Noted
118	4	Maximum height – DPTAC agree with this RSSB qualitative reasoning. A suggestion is made that there may be value in undertaking discussions with NHS Wheelchair Services to better understand whether there might be any additional areas to support this reasoning.		NC	105106	Appendix M	Thanks for the suggestion. We will contact NHS Wheelchair Services where any further future changes to wheelchair dimensions are being considered.
119	4	Sign colour - DPTAC agree with RSSB reasoning in respect of this component.		NC	107	Appendix N	Noted
120	11	The change of title to Accessibility NTSN is supported. Stakeholders such as NR BEAP do not support the use of PRM and it is likely to cause offence to some stakeholders.	Change of title to Accessibility NTSN	NC	1	Title	This is not within the scope of RSSB's work and will be shared with the DfT for consideration.
121	2	Comment from Steven Maslin of AtkinsRéalis: We know People with Reduced Mobility is an industry term but it does seem that this term is dated and reflects an historical focus on mobility.	It seems that the title could be changed perhaps to Persons with Reduced Mobility and Other Access Requirements, or Persons with Disabilities and Reduced Mobility even if the abbreviation for the document is kept to PRM-NSN	NC	1	Title	This is not within the scope of RSSB's work and will be shared with the DfT for consideration.
122	10	Lots of details but a quick scan tells me that it is good news. So, no comments to add		NC	N/A	General	Noted
123	4	Notes highlighting UK specific cases – DPTAC have no comment in respect of this appendix.		NC	N/A	General	Noted

No	Respondent	Comment	Suggestion	Way forward	Page	Clause	Response
124	1	For the transition from the current NTSN to the updated version of NTSN, what is the arrangement of application of the updated version of NTSN with respect to authorisation? For example, the STI requirement changes under PRM clause 4.2.1.11 could have impact on project's final testing and certification for authorisation submission.	Once the proposed changes in NTSN are adopted, we expect relevant RSSB guidance such as GEGN8615 will be updated to explain the rationales of the NTSN changes (i.e. to reflect the qualitative assessment made in the Business Case document). For example, 4.2.1.2.2. (3a) regarding ramp width reduction, 4.2.1.8. (1) & (4) regarding Manual sales counters/information desks and ticket vending machines.	NC	N/A	General	There will need to be a revision to RSSB guidance (GEGN8615) to reflect the NTSN changes.
125	2	Comment from Steve Wilson of AtkinsRéalis: The topics covered relate to those with physical mobility issues, whereas my interest is in those with cognitive challenges caused by various neurodivergent conditions.	It would be good if future revisions of the relevant standard(s) could also accommodate the needs of neurodivergent individuals as far as possible. This could include provision of quiet rooms for individuals to retreat to, e.g. if feeling overwhelmed, as well as minimising intense patterning in finishes, which can cause visual overstimulation; creating virtual tours on websites so an individual can understand their journey ahead of making it, so as to manage anxiety and making wayfinding and processes as clear and easy as possible.	NC	N/A	General	Thanks for raising this issue, but as this proposal needs further discussion and is not related to a change made to the TSI or a change proposed through the consultation to address an existing issue with the NTSN it is outside the scope of this revision and is proposed to be added to the NTSN issues log for discussion and resolution in a future revision of the NTSN or guidance.
126	2	Comment from Lucy Barratt-Smith of AtkinsRéalis: When these documents, or the format in which this content is made available to the end users (for example, a digital PDF or on a website), will accessibility be compliant to the Web Content Accessibility Guidelines (WCAG) 2.1 AA standard.	If it's not meeting AA standard currently, the recommendation is that it should be. Details of what this entails can be found on the gov.uk website here: Guidance and tools for digital accessibility - GOV.UK (www.gov.uk) and there is further useful information here: Accessible communication formats - GOV.UK (www.gov.uk)	NC	N/A	General	The document will ultimately be published by the DfT, where it is assumed that accessibility will be compliant with WCAG 2.1 AA standard.
127	5	Post Brexit we consider there is a need to review the technical standards hierarchy which exists in the UK Railway system. We consider that there is an opportunity to review the rational and purpose of the NTSN's and whether there is an alternative approach, e.g. by integrating them into RSSB technical standards framework, which would provide greater clarity to the UK railway technical community and result in improved passenger outcomes and quicker more cost effective delivery of infrastructure works on railway infrastructure. We note this aligns with the work NR have undertaken with the RSSB in our joint response to the DfT consultation on the Design standards for accessible railway stations dated 1 December 2023.	Undertake a review of purpose, rational and effectiveness of the NTSN's and explore alternative rationalisation options for technical standards/specifications. We highlight the suggested GB analysis proposed in comments 12-15.	NC	N/A	General	Please see response to comment 2 in Section 4 of this document.
128	5	We note that NR and RSSB raised a number of comments on the former PRM TSI wording contained in the DfT accessible stations code of practice contained in the excel spreadsheet named '3.Joint Network Rail and RSSB consultation response (Appendices A and B).xlsx which was submitted in response to the DfT consultation on 1 December 2023.	RSSB to review all of the comments provided by NR and RSSB on this consultation and ensure they are appropriately responded to in the update to the PRM NTSN.	NC	N/A	General	As these proposal needs further discussion and are not related to a change made to the TSI or a change proposed through the consultation to address an existing issue with the NTSN it is outside the scope of this revision and is proposed to be added to the NTSN issues log for discussion and resolution in a future revision of the NTSN or guidance.
129	8	Scope of the following NCB review is the infrastructure subsystem.	N/A	NC	N/A	N/A	Noted
130	4	DPTAC have no comment in respect of this appendix.		NC	N/A	BCfC Appendix D	Noted

No	Respondent	Comment	Suggestion	Way forward	Page	Clause	Response
131	4	DPTAC understand details in these appendices relate to Risk Assessments. As such, DPTAC suggest that RSSB consider future discussions with DPTAC in terms of assumptions noted in these, as appropriate, and if required post consultation.		NC	N/A	BCfC Appendix E&F	We are happy to speak with DPTAC in future regarding assessment assumptions.

4. Collated consultation comments against all NTSNs and responses

No	Respondent	Comment	Suggestion	Way forward	Clause	Response
1	16	<p>General comment on structural and transverse NTSNs – scope of application and configuration control</p> <p>Application of revised NTSNs should be considered in the context of the existing capabilities including those routes which have infrastructure already authorised under TSIs prior to January 2021 and to the current NTSNs since January 2021.</p> <p>Where the revised NTSNs offer design, construction or assessment efficiencies against the current NTSNs then they should be applied.</p> <p>Introducing revised NTSNs presents a configuration management challenge in how the difference in capabilities according to each is recorded in the Technical Files and made apparent to railway undertakings through the register of infrastructure and compatibility processes.</p>	<p>The mandate for the application of NTSNs should be revised and limited only to routes where there is a strategic plan to achieve a joined up interoperable railway.</p> <p>The development of a strategic plan should only be justified where whole industry benefits demonstrably exceed the costs of incorporating the NTSN requirements and the costs of assessment and achieving authorisation.</p> <p>Unless this case can be made then mandating of NTSN requirements over and above the requirements in NTRs, RISs and adopted ENs should be suspended.</p> <p>We would welcome further detailed discussion on this.</p>	NC	N/A	<p>This suggestion to develop a strategic plan for interoperability relates more broadly to the interoperability framework rather than the revision of technical requirements in NTSNs, and any general changes to the scope of application of NTSNs would likely require regulatory changes to the Railways Interoperability Regulations.</p> <p>If NTSN requirements were suspended at this point, it is not the case that requirements in NTRs, RISs and ENs would form a complete set of requirements as these supplement requirements in NTSNs.</p> <p>RSSB has passed on this comment to the Department for Transport to establish future discussion in relation to the interoperability framework in GB.</p>
2	16	<p>General comment on the need for NTSNs in addition to other industry standards</p> <p>The railway is predominately governed by industry-level and company-level standards, alongside the utilisation of some British, European and International standards.</p> <p>Is there a need for a further series of standards applicable to the rail industry (the NTSNs) if the key requirements of the NTSNs are already covered, or could be covered, by the existing suite of standards? e.g. RGS, RIS, company-level standards.</p>	<p>Transfer requirements from NTSNs to other rail industry standards e.g. RGS, RIS, company-level standards.</p> <p>We would welcome further detailed discussion on this.</p>	NC	N/A	<p>This suggestion of simplifying the interoperability standards framework relates more broadly to the interoperability framework rather than the revision of specific technical requirements in NTSNs. We agree that there is an opportunity to simplify the framework and to consider the future management of requirements, and this requires further discussion.</p> <p>RSSB has already raised this with the Department for Transport and this is something we will continue to discuss, and seek to understand views from the sector to support improvements to the standards framework.</p>
3	16	<p>General comment on the authorisation process</p> <p>Rail investment projects are reporting that the authorisation process is driving cost and programme increases into project delivery, but the benefits of the authorisation process are not clear. Whilst the standards themselves (or at least parts of the standards) add benefit, the process by which authorisation takes place is considered to add another layer of governance and assurance on top of what is considered already an acceptable level of governance and assurance.</p> <p>In the case of CSM significant and/or interoperable projects an independent body (AsBo/ApBo/DeBo as required) is appointed to provide assurance prior to entry into service.</p> <p>The requirement for a third layer of infrastructure assurance (above that of Network Rail and the independent body) could be considered unnecessary, especially considering the risk to the operating railway, where many of the requirements in NTSNs are deemed less safety critical than those detailed in other rail industry standards.</p> <p>Furthermore, a recent change of guidance from the ORR has stipulated that no authorisation can proceed with any 'conditions present'. This appears unreasonable, where the risks to these conditions have been assessed and reasonably controlled.</p>	<p>It is recommended that a review is undertaken into the authorisation process as currently defined, and assess its appropriateness, its benefits, its costs and whether an alternative approach (potentially fully delegated) could deliver the same outcomes in an acceptable manner.</p> <p>We would welcome further detailed discussion on this.</p>	NC	N/A	<p>We note the suggestion of a review into the authorisation process which will need to take place before changes to specific NTSN requirements related to assessments, and therefore will need to be considered over a longer timeframe than this revision of the NTSNs.</p> <p>As this will need to be considered in relation to the interoperability framework and the Railway Interoperability Regulations, RSSB has passed this comment to the Department for Transport to establish future discussions.</p>

No	Respondent	Comment	Suggestion	Way forward	Clause	Response
4	16	<p>OPERATING RULES</p> <p>A GB-focused analysis is required. Operating rules are a license condition, and are regulated by the ORR. There is no apparent benefit for these to be independently reviewed by an Approved Body.</p> <p>Historically, Approved Bodies have reviewed the following documents when approving Electrification projects.</p> <ul style="list-style-type: none"> • A health and safety management system • Electrical control room manual • Electrical control room briefing register • Emergency plans • Isolation instructions and diagrams • Sectional Appendix updates • Notifications of energisation • Installation instructions • Training material 	<p>Delete clause or permit self-assessment for IMs and RUs.</p> <p>We would welcome further detailed discussion on this.</p>	NC	4.4	<p>There remains a need in some NTSNs for a requirement for specific operating rules to be listed. NTSNs currently state in Section 6 that Approved Bodies only need to verify that any required documentation is provided, not to verify the information within the documents.</p> <p>The interpretation of the extent of Approved Body review for specific NTSNs will be considered in the production of Guidance Notes for the application of NTSNs, to avoid any unnecessary costs for the sector. These Guidance Notes will be updated following the publication of the NTSNs by the Secretary of State.</p> <p>This is an opportunity for further discussion beyond this revision of the NTSN text. We would also welcome further understanding of specific operating rules that are not required in the NTSN.</p>
5	16	<p>MAINTENANCE RULES</p> <p>A GB-focused analysis is required. Maintenance rules are a license condition and are regulated by the ORR. There is no apparent benefit for these to be independently reviewed by an Approved Body on a project-by-project basis.</p> <p>Historically, Approved Bodies have also reviewed the Network Rail standards portfolio for electrification projects.</p>	<p>Delete clause or permit self-assessment for IMs and RUs.</p> <p>We would welcome further detailed discussion on this.</p>	NC	4.5	<p>There remains a need in some NTSNs for a requirement for specific maintenance rules to be listed. NTSNs currently state in Section 6 that Approved Bodies only need to verify that any required documentation is provided, not to verify the information within the documents.</p> <p>The interpretation of the extent of Approved Body review for specific NTSNs will be considered in the production of Guidance Notes for the application of NTSNs, to avoid any unnecessary costs for the sector. These Guidance Notes will be updated following the publication of the NTSNs by the Secretary of State.</p> <p>This is an opportunity for further discussion beyond this revision of the NTSN text. We would also welcome further understanding of where specific maintenance rules are not required in the NTSN.</p>
6	16	<p>PROFESSIONAL QUALIFICATIONS</p> <p>A GB-focused analysis is required. A Health and Safety management system is a license condition, and it documents the professional qualifications required for key posts. This is regulated by the ORR. There is no apparent benefit for these to be independently reviewed by an Approved Body on a project-by-project basis.</p>	<p>Delete clause or permit self-assessment for IMs and RUs.</p> <p>We would welcome further detailed discussion on this.</p>	NC	4.6	<p>Most NTSNs typically do not contain additional requirements for professional qualifications or competencies, but where they do these may not be covered by a Health and Safety management system, for example PRM NTSN requirements are to include disability awareness and equality.</p> <p>Section 6 of the NTSNs explains what the assessments should cover; they do not include the assessment of professional qualifications.</p> <p>The interpretation of the extent of Approved Body review for specific NTSNs will be considered in the production of Guidance Notes for the application of NTSNs, to avoid any unnecessary costs for the sector. These Guidance Notes will be updated following the publication of the NTSNs by the Secretary of State.</p> <p>This is an opportunity for further discussion beyond this revision of the NTSN text. We would also welcome further understanding of where specific professional qualifications are not required in the NTSN.</p>

No	Respondent	Comment	Suggestion	Way forward	Clause	Response
7	16	<p>HEALTH AND SAFETY CONDITIONS</p> <p>A GB-focused analysis is required. Compliance with legislation is a given. There is no apparent benefit for these to be independently reviewed by an Approved Body on a project-by-project basis.</p>	<p>Delete clause or permit self-assessment for IMs and RUs.</p> <p>We would welcome further detailed discussion on this.</p>	NC	4.7	<p>Section 6 of the NTSNs explains what the assessments should cover; they do not include the assessment of health and safety requirements.</p> <p>The interpretation of the extent of Approved Body review for specific NTSNs will be considered in the production of Guidance Notes for the application of NTSNs, to avoid any unnecessary costs for the sector. These Guidance Notes will be updated following the publication of the NTSNs by the Secretary of State.</p> <p>This is an opportunity for further discussion beyond this revision of the NTSN text.</p> <p>We would also welcome further understanding of where specific health and safety conditions are not required in the NTSN.</p>
8	17	Gender specific language still remains in NTSNs other than LOC&PAS	Review all NTSNs to remove gender specific language	DC	Throughout	Thanks for highlighting that. This has now been corrected in all NTSNs.
9	18	No comments		NC	N/A	Noted