

Consultation comments received on Rail Industry Standard
RIS-7016-INS Interface between Station Platforms, Track, Trains, Buffer Stops



Closing date 26 January 2022

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Summary of comments submitted	Number	Comment categorisation key
Consulted		
Critical errors	4	CE
Editorial errors	16	ED
Typographical errors		TY
Observations	12	OB
Total returned		
Classification codes (CC)		
Document change	20	DC
No change	12	NC
Date responses published:		

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								ED	DC	
1	19 20	3.2.1.2 G 3.2.1.12	The requirements and guidance regarding platform extensions should be entirely reviewed. The current lack of clarity and guidance both encourages and perpetuates different vehicle step heights and offsets at platforms where extensions have been added. In practical application, following the current requirements and guidance results in the new extended section part of the platform being	The requirements and guidance should make it clear that whenever platform extensions are proposed, the track position should be optimised. Track design and corrective action may be necessary to optimise the track alignment before adjusting the existing copers positions to the UK target values. This will facilitate construction of the new section of platform and minimise the	1			ED	DC	New guidance clauses added after both G 3.1.1.15 and G 3.2.1.15 to describe good practice in taking a longer term view for a platform extension project and taking into account future work to bring the full platform length into compliance. <i>When designing and implementing a platform extension it is good practice to consider how, in the future, the full length of the platform will be brought into compliance with the standard position. Achieving compliance for the full platform length may not be appropriate as part of the initial project but consideration of practical options is used to inform the design of the extension. Optimisation of the long-term position may include consideration of a time-limited deviation for the offset / height of the extension. Simply building the extension to the standard position, without consideration of future options for the full platform length, is not good</i>

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			constructed to the UK target height and offset values. However, this leaves the existing (non-compliant) part of the platform difficult if not impossible to restore to compliance. This effectively 'locks in' poor track alignment and is in conflict with the guidance and requirements given in Clause 3.3.1. and elsewhere in the Standard.	need for a connecting ramped section.					Way forward	practice.
2	19	3.2.1.3	The mandatory requirement for platform copers restraints should not be intended to be applied retrospectively.	Alter the text to read " <i>New or renewed platform copers shall have a restraint to prevent them from moving, and thereby infringing clearances or endangering passengers or staff.</i> "	1			ED	DC	This requirement was taken from RIS-7700-INS. It has now been moved to guidance.
3	18 22	G 3.1.1 .18 G 3.5.1 0	The Guidance is included twice (against platform height and platform offset). This only needs to be included once.	Delete both clauses and re-word as a single guidance clause in line with the response to Comment 1 above.	1			ED	NC	The reference to T1166 is intentionally included in both Section 3.1 and 3.5 as they are different requirements and may be read by different projects.
4	8	1.2.4- 1.2.8	Given the Govt consultation on RIR 2011 is still under review and the weight of industry feeling to reform/reduce the regulations, clauses bolstering the case for NTSN compliance should be reviewed on publication of the outcome of the RIR 2011 consultation.	Revisit clauses on publication of the DfT output from the 2021 interoperability consultation.	2			OB	NC	It is not proposed to delay publication of this revision to await the DfT review. The documents can be updated in future if this is appropriate.
5	16	3.1.1.3	The +10 construction tolerance is too restrictive given the difficulties of construction during possession/at night/in poor weather. Tamping also	Extend construction tolerance to 15 or 20mm.	2			OB	NC	The +10mm construction tolerance was agreed following extensive industry discussion as part of the previous revision. Extending it further is not part of this project. The design height can be chosen, within the permitted range, to take into account the construction process.

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								Way forward		
			has challenges in achieving such tight values.							
6	31	G 6.1.17	The DfT Code v4 is often quoted as being legally mandated under NRS licence conditions. Therefore the reference to quoted values being ‘aspirational’ will cause confusion in application.	Clarify status of the DfT Code of Practice for Accessible Railway Stations v4 in 7016 and with DfT. Noting document is out of date, causes industry confusion in both status and current validity and does not reflect the latest version of BS 8300.	2			ED	DC	The last sentence of the clause has been deleted. We understand that DfT are planning a review of the Code of Practice and any conclusions can be incorporated in a future update to the RIS.
7	48	G 9.7.10	Corrosive cleaning and de-icing agents can damage more than just the platform surface.	Change to - The effects of any substances used for activities such as cleaning or de-icing are considered to avoid detrimental effects on platform surfaces, sub-structures or electrical/mechanical railway systems.	2			ED	DC	Text modified in line with proposal
8	8	1.2.7	The sentence is ambiguous with two “also” and the word “which” is not clear what it is referring to i.e. the NTSNs or the RIS	Delete both occurrence of the word “also” and change the word “which” to “and” so it referring to the RIS.	3			ED	DC	Text modified in line with proposal – the first ‘also’ is deleted and ‘which also’ is modified to ‘both of which also’ to clarify that this is referring to the two NTSNs.
9	8	1.2.8	Due to the reproduction of the NTRs from GIRT7020 in this RIS-7016-INS, my comments will also be repeated in this consultation where applicable.	None.	3			OB	NC	Noted, our responses will also be repeated against both sets of comments.
10	19	3.2.1.3	The new requirement for platform copers to have a restraint should not be part of the mandatory requirements for platform offset as it is expanding the scope of the NTR DeBo assessment for compliance	The requirement for platform copers to have a restraint should be included in Part 9 of RIS-7016-INS but not in Part 3 of the RIS.	3			ED	DC	See comment 2 above. This requirement, which was moved from RIS-7700-INS, did not fit neatly into any sub-section of Part 9 and so has been converted to guidance.

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			against the INF NTSN from gauging to structural considerations.							
11	19	3.2.1.3	“Platform copers” are plural whereas “a restraint” is singular.	“Platform copers shall have restraints...”	3			ED	DC	See comment 2 above, this clause has been moved to Guidance
12	19	3.2.1.3	The second part of this clause after the comma is the rationale / justification for the requirement and should not be part of the requirement.	There should be additional guidance under the Rationale heading such as “Restrained platform copers will prevent them from infringing clearances or endangering passengers or staff.”	3			ED	DC	See comment 2 above, this clause has been moved to Guidance
13	19	3.2.1.3	There should be an explanation under the Guidance heading why clause 3.2.1.3 has become a NTR requirement i.e. is based on recent incidents or research or the transfer of the requirement from RIS-7700-INS.	None.	3			ED	DC	See comment 2 above, this clause has been moved to Guidance
14	24	G 4.1.10	The statement that “The 'danger area' is not defined in the PRM NTSN” is incorrect. The danger area is defined in the PRM NTSN in point 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.” However, the danger area is not dimensioned.	“The 'danger area' is not dimensioned in the PRM NTSN”.	3			ED	DC	Text modified in line with proposal - dimensioned is a better word

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15	30	G 6.1.10	<p>EN 12464-2 also covers very small numbers of passengers on open platforms but it does not cover medium number of passengers on covered platforms.</p> <p>EN 12464-1 does not cover medium number of passengers on fully enclosed platforms.</p>	State in separate sentences what EN 12464-1 and 2 provide lighting parameters for in terms of the platform and passenger criteria.	3			ED	DC	<p>Text modified in line with proposal.</p> <p>Clause G 6.1.10 has been redrafted to make it clearer which values come from which EN: <i>Requirements for horizontal illuminance and uniformity, u_0, are provided in the PRM NTSN by reference to EN 12464-1 and EN 12464-2. These documents consider platforms as 'Open', 'Covered', or 'Fully enclosed' and the number of passengers as 'Small', 'Medium' or 'Large' - see Table 1. EN 12464-1 covers indoor work places and the lighting requirements for Fully enclosed platforms with a small number of passengers are referenced.</i> <i>EN 12464-2 covers outdoor work places and the lighting values for Open platforms with a small or a medium number of passengers and values for Covered platforms with a small number of passengers are referenced.</i> <i>EN 12464-2 also includes values for platforms with a very small number of passengers, but these are not given in Table 1 as a minimum lighting level of 10lux is already required for GB platforms.</i></p>
16	31	G 6.1.10 Table 1	The "5 lux ($U_0 = 0.2$)" for a "small number of passengers" on open platforms is taken from row 5.12.1 for "very small number of passengers" in EN 12464-2. It should be taken from row 5.12.6 for "small number of passengers" on open platforms and the resulting parameters should be 10 lux with $U_0 = 0.25$	Replace "5 lux ($U_0 = 0.2$)" with "10 lux ($U_0 = 0.25$)" in table 1 for a small number of passengers on an open platform.	3			CE	DC	Thank you for pointing out this error, text modified as proposed.
17	31	G 6.1.15	The statement that there is no GB guidance for passenger number is unhelpful.	Guidance should be provided on passengers numbers to help designers make an informed selection of the appropriate lighting parameters to be used in lighting designs.	3			OB	NC	No new information is available to provide such guidance. As there is a large range of possible scenarios that would apply at different stations, it is not straightforward to provide such guidance and detailed research is likely to be needed. Industry has not indicated that such research should be prioritised.
18	31	G 6.1.16	The first sentence is incorrect as the reference to 5 lux should be 10 lux	Reword to state that no platforms in the GB should be	3			CE	DC	The clause has been modified to refer to a very small number of passengers. 6.1.1 already requires a minimum of 10 lux so the change to number of passengers does not affect this. The

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			for open platforms with a small number of passengers. See above comment on clause G 6.1.10 Table 1.	considered to have a “very small number of passengers” such that the minimum lux level is 10.						table has been updated.
19	31	G 6.1.17	This clause is confusing. It appears to state that this RIS aligns with the DfT issued 'Design Standards for Accessible Railway Stations version 4'. It then states some lighting levels are aspirational and are not an industry requirement which appears to contradict the alignment between standards comment. The DfT document needs to be updated.	Delete clause.	3			ED	DC	See comment 6 above. The last sentence of the clause has been deleted. We understand that DfT are planning a review of the Code of Practice and any conclusions can be incorporated in a future update to the RIS.
20	44	9.6.6 Figs. 7 and 8	Figures 7 and 8 are non-compliant with PRM NTSN point 4.2.1.12 (6) as the yellow line and tactile paving do not mark the boundary of the danger area due to GB practice to keep the tactile paving 760 mm from the platform edge.	It should be acknowledged that figures 7 and 8 are non-compliant with PRM NTSN point 4.2.1.12 (6) as the yellow line and tactile paving do not mark the boundary of the danger area due to GB practice to keep the tactile paving 760 mm from the platform edge.	3			OB	NC	There is an industry agreement, based on RSSB research and the work following the incident at Eden Park, that this proposal is the appropriate solution for GB. The danger area is not dimensioned in the PRM NTSN and there is no single danger area as the area varies for different risks. The tactile paving does not mark the boundary of these different areas.
21	51	G 9.10.1 2	There is already a requirement to provide a mesh screen at the back of voided platforms in clause 9.5.2 and this requirement should not be repeated as guidance in this clause. Note that clause 9.5.2 states “For new platforms and alterations to platforms, a removable barrier such as a mesh screen shall be provided at	The example of mesh screen should be referenced back to the requirement to provide a mesh screen at the back of voided platforms in clause 9.5.2.	3			ED	DC	G 9.10.1.2 has been modified.

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			the front and rear of voided platforms to prevent rubbish accumulation under the platform."							
22	76	C 1.3	EN 12464-2 also covers very small numbers of passengers on open platforms but it does not cover medium number of passengers on covered platforms. EN 12464-1 does not cover medium number of passengers on fully enclosed platforms.	State in separate sentences what EN 12464-1 and 2 provide lighting parameters for in terms of the platform and passenger criteria.	3			ED	DC	A new clause has been added after C 1.3 to state: <i>EN12464-2 also covers Open platforms with a very small number of passengers. These values are not included here as the levels are below the minimum required for GB platforms.</i> Clause C 1.4 has been modified to indicate that not all combinations are covered.
23	76	C 1.4	The "5 lux ($U_o = 0.2$)" for a "small number of passengers" on open platforms is taken from row 5.12.1 for "very small number of passengers" in EN 12464-2. It should be taken from row 5.12.6 for "small number of passengers" on open platforms and the resulting parameters should be 10 lux with $U_o = 0.25$	Replace "5 lux ($U_o = 0.2$)" with "10 lux ($U_o = 0.25$)" in table 1 for a small number of passengers on an open platform.	3			CE	DC	Thank you for pointing out this error, text modified as proposed.
24			Business Case for Change - 20-021 Update to the Station Platform Standards, GIRT7020 and RIS-7016-INS		3			OB	NC	This is only a heading
25	5	2.5	RSSB issued a consultation letter titled "PRM NTSN clause 4.2.1.2.3(2) – Tactile surfaces for wayfinding" on 30 September 2021 with a deadline to submit comments by 28 October 2021. However, the business case for change states "Guidance on the	Provide guidance in this revision of RIS-7016-INS regarding tactile surfaces for wayfinding.	3			OB	NC	As you have noted, work is underway on tactile surfaces for wayfinding but conclusions are not yet available and so cannot be incorporated in this revision. When further information is available then revision of this document will be considered.

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			use of tactile wayfinding was considered and may be added at a future revision.” The rail industry needs this guidance now and cannot wait until the next revision of RIS-706-INS noting that the proposed publication of this revision is September 2022.							
26	General		It is understood there is a DfT review of the Interoperability Regulations; should publication of the changes in this standard await the outcome of DfT deliberations?	Gain an understanding of DfT’s work to see if this might change outcomes prior to publication, or if OK to proceed.	4			OB	NC	We understand that DfT are planning a review, but no results are available for incorporation at this stage. Any conclusions can be incorporated in a future update to the RIS.
27	General		<p>None of the documents really define required platform widths and associated danger area...which is usually left to projects to define...this could be better defined in standards to ensure consistency.</p> <p>As an example... some projects go with required usable platform width of 3000mm but forget about station furniture, lighting/CCTV columns and disabled train boarding ramps etc...so actually end up needed wider platforms to accommodate all this stuff...which isn’t always well understood at the outset of projects particularly at feasibility stage.</p>	<p>Clarify meaning and extent of danger area or refer to standard which does.</p> <p>Clear statements/illustration of how platform width varies depending on furniture such as LP etc</p>	4			OB	DC	Additional guidance has been added as part of Clause G 4.1.14 to clarify the importance of considering furniture, signs etc, in design of platform width.

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28	General		Links between 7016 and NTSN requirements could be better co-ordinated and easier to follow the overall requirements.	Coordinate.	4			OB	NC	GIRT7020 is the document that links to the NTSN. The requirements are repeated in RIS-7016-INS to avoid projects having to compare more documents.
29	P41/42		In the updated copy of 7016 provided I think there may be an error on pages 41 and 42. Recess is stated as 300mm x 480mm whilst figure 5 shows 400mm x 480mm.	Which is correct; rectify to accord. (Are we returning to 300mm to help with structure efficiency?)	4			CE	DC	Thank you, the diagram has been amended, the mandated dimension remains 300 mm.
30	P45	G9.6.11	This refers to DfT v4. As you will be aware this has not been updated since 2015 and doesn't account for BS8300.2018. This causes conflicts and confusion.	Suggest "DfTv4" as amended by BS8300.2018" or some signposting to confirm whether DfTv4 takes precedence over BS8300, or visa versa, pending updating of the DfT v4 standard.	4			OB	NC	We understand that DfT v4 is still the relevant document here. BS8300 is not railway specific and the platform edge tactile is a railway specific design.
31	n/a	n/a	This document has been reviewed by TfL Engineering Built Environment who support the standards committee approval of the publication of this document. However, it has not yet been reviewed by TfL Engineering Track. A further response may be returned by them.	n/a	5			OB	NC	Noted
32	16	3.1.1		Please could guidance be added to show that RSSB is aware that in areas where rolling stock with significantly different floor heights operate. Specifically National Rail Stock and London	6			ED	DC	<p>New guidance clause added after G 3.1.1.14</p> <p><i>There are some areas where rolling stock from different systems, with significantly different floor heights, shares the same platform. This can occur, for example, where platforms are shared between National Rail and London Underground. In these cases, a compromise platform height is sometimes used, with suitable permissions.</i></p>

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								Way	forward	
				Underground Rolling Stock. 915mm height is not complied with and a compromised platform height is used.						