



## **Position Paper**

Brussels, 14 September 2016

# **HS2 proposal on platform heights**

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# Summary

The UK presented at RISC (Railway Interoperability and Safety Committee) proposals for the European Commission's consideration on possible ways to permit the UK to build HS2 platforms at a higher height (1100-1200 mm). The new height would require deviating from the previously set out platform heights, as specified in the TSI INF and the GB Specific Case (915 mm).

CER members, as part of the key association of the European rail operating community, have been asked by the Agency to make their submissions in respect of this proposal, to provide a basis for a new and more extended impact study.

After a thorough and considered discussion, CER members\* agreed on the following points:

- A derogation or specific case would be new obstacles to interoperability.

The Agency published a related technical opinion stating that no "derogation" or "specific case" could be granted.

CER members\* consider that allowing an additional platform height would be an additional obstacle for interoperability in the European railway system leading to significant cost increases.

- A new target system would slow down opening access to the network.

According to the Agency's first technical opinion, the HS2 project was not allowed as a specific case; however if the 1200 mm-high platform is accepted as an "innovative solution", it would then be integrated in the core text of the TSIs and form part of the target system.

In case a new target system is introduced in the TSIs, this would inevitably lead to some impact on the existing target systems and the modification of the related TSIs.

CER members\*, on this point, believe that a new target system could slow down the open access to a Single European Railway Area.

\* except HS2 and ATOC which are in favour of proposing the 1200 mm-high platform as an "innovative solution".

## POSITION PAPER

HS2 proposal on  
platform heights



### 1. Context

The UK asked the European Commission to consider possible ways to permit the UK to build HS2 platforms at a higher height than presently allowed. For reasons of accessibility and dwell time, the intention of HS2 is to provide level access to the trains at all doors, which can only be done from a platform of approximately 1100-1200 mm. This new requirement would constitute a deviation from the previously defined platform heights of 550 mm and 760 mm, as specified in the TSI INF.

The outcome of the discussions on HS2 platforms indicates that a higher height has a broad impact on the railway system: accessibility for persons with reduced mobility (PRM), but also infrastructure and rolling stock costs and long-term harmonisation.

The Agency has been asked to more thoroughly investigate, starting from the previous Technical Opinion ERA/OPI/2015-4, the implications of a higher platform of 1100-1200 mm for European railway undertakings and infrastructure managers, i.e. adding this height in the INF TSI in addition to the two existing target platform heights (550 mm, 760 mm).

### 2. Position of CER members\*

#### Impact on infrastructure

At the last support group meetings on this subject, members did not express interest in adopting the UK's proposal or a new target system for a new platform height. From the railway infrastructure managers' perspective a third target system would lead to higher costs and less efficiency in the railway system as a whole. This especially concerns the interface between the platforms, rolling stock, equipment for passenger accessibility, etc. Therefore the view is that this is in contradiction with what the sector wants to achieve with interoperability.

Railway companies' strategies currently do not consider, for future plans, platform heights with a deviation from the current target system.

Even in the scenario where HS2 is intended to be isolated and not connected with HS1, CER members\* recognise that there is a risk of having more countries using the new height and preventing interoperability by introducing a new target system. This is also valid for the new height being considered as an "innovative solution", because it would become a new target in a future revision of the TSIs.

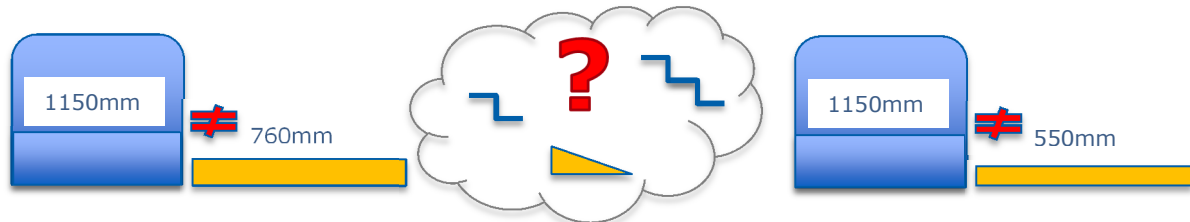
#### Impact on rolling stock

From the railway undertakings' perspective in CER\*, the cost of rolling stock and operations would increase if a new target system were in place. Existing rolling stock would not be able to operate on the new target system as the new height requires more than just minor modifications.

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## POSITION PAPER

HS2 proposal on  
platform heights



### Impact on accessibility, PRM perspective

Vehicles which offer level access at a platform height of 1100-1200 mm, at all external doors, could only operate at the other platform heights by using two or three external steps, building stairs or requiring equivalent equipment like a lift. This could have an impact on safety; additional injury risks would need to be analysed and evaluated, as well as additional costs.

Moreover persons with reduced mobility would have better access to/from the train at the HS2 stations but worse access at all other TSI-compliant stations, which would be equipped with alternative access facilities. The same difficulties could potentially be encountered for the access between the higher platform and the classic fleet. The appropriate way to consider PRM needs is to adopt interoperable solutions, applicable to the Single EU Railway Area without new compatibility problems.

### 3. Conclusion:

CER members\* consider an additional platform height as an obstacle for interoperability in Europe that would cause a significant cost increase for compatibility. A "specific case" (or the "innovative solution") could slow down the open access to a Single European Railway Area.

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## About CER

The Community of European Railway and Infrastructure Companies (CER) brings together more than 70 railway undertakings, their national associations as well as infrastructure managers and vehicle leasing companies. The membership is made up of long-established bodies, new entrants and both private and public enterprises, representing 73% of the rail network length, 80% of the rail freight business and about 96% of rail passenger operations in EU, EFTA and EU accession countries. CER represents the interests of its members towards EU policy makers and transport stakeholders, advocating rail as the backbone of a competitive and sustainable transport system in Europe. For more information, visit [www.cer.be](http://www.cer.be) or follow us via Twitter at @CER\_railways.

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