

Rail Vehicle Accessibility  
Rail Services Group  
Department for Transport  
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For the attention of Philip Hunt

[railvehicleaccess@dft.gov.uk](mailto:railvehicleaccess@dft.gov.uk)

Date: 1 October 2025

Dear Sir

**Re: Open consultation - Rail vehicle dispensation:  
Great Western Railway Class 230 fast charge unit**

Railfuture is Britain's leading and longest-established, independent national voluntary organisation campaigning exclusively for a better railway across a bigger network for passenger and freight users, to support economic growth, environmental improvement and better-connected communities.

We are responding to the 'Rail Vehicle Dispensation: Great Western Railway Class 230 Fast Charge Unit' dispensation request published by the Department for Transport on 26 September 2025.

We note Great Western Railway (GWR) proposes to bring unit 230001 and related vehicles (the 'Unit') into passenger service between Greenford and West Ealing and that it has been operating on the route in non-passenger service for around 18 months since March 2024 as part of the Fast Charge Trial.

It is understood that the Unit does not comply with certain requirements of the Accessibility National Technical Specification Notice (ACC NTSN) and accordingly GWR is applying for dispensation against those particular requirements. GWR has given an explanation for that non-compliance. We further note the measures GWR has stated it will put in place to enable disabled people to use the Unit notwithstanding non-compliance and that it has sought opinions from the GWR Accessibility Panel which consists of various disabled customers and disability groups.

We mention we place considerable importance to accessibility issues, and indeed campaign on them, however we recognise there are situations where full compliance with accessibility requirements is not possible for certain operations, and that a balanced view then needs to be taken, hence the existence of the dispensation procedure.

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[www.railwatch.org.uk](http://www.railwatch.org.uk)



We consider that a primary aim for the rail industry going forward must be 100% electric or hybrid operation across the rail network, a difficult task bearing in mind the complexity of the network and economic realities.

Railfuture commends GWR for looking over the horizon and providing leadership including the potential of converting existing vehicles to battery electric or electric, battery hybrid operation, and in taking the lead on operating fast charge electric battery technology in the absence of any modern equivalent of the former BR research facility, so necessary but sadly lacking at present.

We take the view that the industry must build on this, and move away from yet more diesel only units in order to bring the benefits of cost effective electric operation to important feeder routes, so critical in bringing rail service benefits to wider catchment areas.

It is apparent that use of the Unit as proposed will generate a return on the money invested in the fast charging facility, prove the facility in real passenger service and provide a benefit for passengers by releasing a class 165 unit to strengthen the fleet elsewhere on the network. In order to realise the benefits of this innovative technology it is of course necessary to obtain practical experience of operations with passengers aboard.

After full consideration of the issues raised in the dispensation request, Railfuture is strongly of the view that the dispensation should be granted in the terms in which it is sought.

Yours faithfully

***Richard Bowry***

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