
From: Turner, Giles [mailto:Giles.Turner@orr.gsi.gov.uk]
Sent: 11 August 2011 10:51
To: John Bengough
Cc: Phillips, Tracy; Keay, David; Lown, Rupert; Eyles, Andrew; Raxton, Ian
Subject: Equality Act 2010 Section 183 exemption application by Cairngorm Funicular Railway

Dear Mr Bengough,

Equality Act 2010 Section 183 exemption application by Cairngorm Funicular Railway

Thank you for giving ORR the opportunity to comment on the application for an exemption from elements of the Rail Vehicle Accessibility Regulations by the Cairngorm Funicular Railway (CFR). ORR has not identified any difficulties that the exemption would cause in enforcing the remaining provisions of RVAR on the CFR.

Although ORR is not the safety regulator for CFR, individual experience of rail-borne transport supports the view that the granting of this exemption would not make any difference to the safety of the operation.

By way of mitigation for the absence of a compliant visual and audible passenger information system, it may be possible to use a permanent or seasonal (the stopping pattern depends only on whether it's summer or winter) sign in each end window to provide confirmation of the destination of the approaching vehicle. As the vehicles are captive this would provide a minimal maintenance or operational burden. The exemption request also does not consider mitigation through the provision of signs on the platform of the intermediate station, which may be a simple way of linking the direction of the vehicle with its destination. It is acknowledged that these suggestions provide no benefit once the vehicle has arrived at the station.

Yours sincerely,

Giles Turner

Giles Turner | Engineer, Rail Vehicles | Engineering & Asset Management | Railway Planning & Performance Directorate

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