

# Consultation on Improving Access to Taxis

February 2009



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## Foreword



Taxis have a vital role to play in the transport system and help many people to travel to jobs, services, education and social networks. It gives me great pleasure to present this consultation, which explores how to improve access to taxis for disabled people, ensuring that they, in turn, might be able to have greater access and equality of opportunity.

I know that the issue of taxi accessibility has been under consideration for some time and that it has proven difficult so far to deliver the changes that are needed whilst, at the same time, ensuring that the taxi industry remains viable. I am, however, committed to finding positive solutions to the issues that need to be addressed, that will provide a fleet which meets the needs of all users and that will affirm the role of taxis as an integral part of the transport system.

I hope that this consultation document will stimulate a constructive discussion of the issues and that it will enable us to develop and implement a strategy that will result in real improvements. Following this consultation, we will publish a policy strategy in spring 2009 that will set out in detail the conclusions of the consultation and the way forward.

Your views are important, so please use this opportunity to share them with us and contribute to the discussion

A handwritten signature in black ink, appearing to read 'Paul Clark', with a long horizontal stroke underneath.

**Paul Clark MP**

Parliamentary Under Secretary of State  
for Transport

# 1. Introduction

**1.1** Transport affects everyone and is essential for a strong economy and society, providing access to jobs, services and leisure activities. The Department for Transport's (DfT) aim is transport that works for everyone, and we have four strategic objectives to:

- sustain economic growth and improved productivity through reliable and efficient transport networks;
- improve the environmental performance of transport and tackle climate change;
- strengthen the safety and security of transport; and
- enhance access to jobs, services, leisure facilities and social networks, including for the most disadvantaged.

**1.2** In November 2008, the DfT published *Delivering a Sustainable Transport System*. The strategy document outlines, amongst others, five goals for transport. These are to:

- **support** national **economic** competitiveness and **growth**, by delivering reliable and efficient transport networks;
- reduce transport's emissions of carbon dioxide and other greenhouse gases, with the desired outcome of **tackling climate change**;
- **contribute to better safety, security and health** and longer life expectancy by reducing the risk of death, injury or illness arising from transport, and by promoting travel modes that are beneficial to health;

- **promote** greater **equality of opportunity** for all citizens, with the desired outcome of achieving a fairer society; and
- **improve quality of life** for transport users and non-transport users, and to promote a **healthy natural environment**.

**1.3** The DfT's aims for enhancing access and helping equality of opportunity feed into other Government objectives. For example, the cross-Government Independent Living Strategy was published in 2008, and this sets out a series of commitments that the Government and disabled people are now implementing to help disabled people have greater choice and control over their lives. In the strategy, the DfT has committed to:

- enhancing personal mobility and transport choices for disabled people, based on evidence of what works;
- promoting the training of transport providers in the needs of disabled people; developing a strategy to provide information and confidence training for disabled people in using transport;
- working with local authorities to ensure accessibility planning is reflected in Local Transport Plans and Local Area Agreements; and
- improving disabled people's participation in the development and implementation of transport policies.

**1.4** Over the past 10 years, there have been major improvements in the accessibility of the transport network as a result of the Disability Discrimination Act 1995. Over a third of all trains are now accessible and over half of the bus fleet. Appropriate 'end dates' have been set in regulations by which time all trains, buses and coaches must be accessible. The DfT has acted to build the needs of different groups into its policy development and service delivery through its Race, Disability and Gender Equality schemes. As well as the DfT and its concessionary fares scheme, other Government departments are working to tackle the affordability of transport through a range of measures – for example, through the tax system, the Disability Living Allowance and the mobility component.



**1.5** There are emerging challenges that the DfT is considering within the context of its work on *Delivering a Sustainable Transport System* as, for instance, some of the forecast social changes will have implications for accessibility and equality of opportunity. Some of the key trends to note are as follows:

- there has been a reduction in relative and absolute poverty, and income inequality is starting to fall. But these improvements have not been shared by all, and specific groups are at risk of social exclusion, including those in most poverty, those without qualifications and those with mental illness;
- disabled people, as defined by Government, account for about one-fifth of people in the UK. The Department for Work and Pensions estimates that there are currently over 10 million disabled people in Britain, 4.6 million of whom are over state pension age. Seven hundred thousand are children. One in four households has a disabled member; and
- projections by the Office of National Statistics show a clear increase in the population of the UK until 2031. It is also predicted that there will be 27 million people over the age of 50 by 2031. Disability rates increase with age, and some estimates predict a rise of 69 per cent over the next 20 years in the number of people facing disability.

**1.6** It is clear that the growing number of disabled and older people will have social and economic implications. The DfT will therefore need to work with its partners and focus in the coming years on issues such as the accessibility of public transport, the provision of transport including community transport, the role of technology in improving information provision and ticketing, and improving people's confidence in using the transport system. Taxi and private hire vehicle services will continue to play an increasingly important role in helping people to travel and to connect to other public transport services.

## What is this consultation about?

**1.7** This consultation is specifically about improving access by disabled people to taxis. Taxis (more formally known as licensed hackney carriages) and private hire vehicles (or PHVs or minicabs, as some of them are called) play an important part in local transport and they are being increasingly used in innovative ways, for example as taxi-buses, to provide local transport services. Taxis and private hire vehicles are often used by disabled people as an alternative to public transport, or to begin or finish a journey. But the following issues have been identified through previous consultations and discussions with user groups that the DfT would like to address:

- there is anecdotal evidence that not enough licensed taxis are available in the locations and at the times needed by disabled people, including wheelchair users and people with an ambulatory disability. There is a belief that demand is being suppressed in some areas by this lack of availability and that this is contributing to disabled people not having equal access to jobs, services and social networks. Further work and research is needed to quantify the extent to which this is a problem;
- around half of the licensed taxi fleet is currently classed as being wheelchair accessible. The majority of these taxis are available in London. There is great variation between regions and between cities and rural areas. There is also variation between standards and the level of accessibility offered;
- there is anecdotal evidence about the need to improve kerbside infrastructure, information and waiting areas at ranks and at interchanges to help disabled people transfer between modes;
- the DfT receives a steady stream of correspondence and complaints about poor driver behaviour and about licensed hackney drivers refusing to stop and pick up disabled people; and

- there is a need for improved information to help disabled people plan in advance for trips that they would like to make so that they know, for instance, if they need to pre-book a licensed taxi to make a particular connection, and so that they can travel with a greater level of certainty.

**1.8** The term ‘accessible taxi’ can mean different things to different people. In this document and in the Impact Assessment, we will use the following terms:

- **saloon car vehicles** – these vehicles are conventional cars and are not accessible to wheelchair users. They meet the needs of many people, including those with an ambulatory disability. As well as saloons, they may be hatchbacks or estate cars. They can be licensed as hackney carriages in some areas, depending on the policy of the local licensing authority. The private hire taxi fleet is almost entirely made up of saloon cars;
- **wheelchair accessible vehicles** – these can be purpose-built vehicles (e.g. LTI, Metrocab) or converted multi-purpose vehicles (e.g. by Peugeot or Mercedes). These vehicles fall within the DfT’s classification of purpose-built or converted taxis for the purposes of collecting licensed taxi statistics. In practice, however, some of these vehicles would not meet the DfT’s draft interim standard (see below) for a wheelchair accessible taxi, e.g. the Fairway and Metrocab vehicles. Wheelchair accessible taxis are mostly licensed as hackney carriages, but converted multi-purpose vehicles are increasingly being used by private hire drivers;
- **fully accessible vehicles** – this term refers to a vehicle that would meet the needs of disabled people, including wheelchair users and people with an ambulatory disability. At present, there are no vehicles on the market that would meet all the requirements that are included in the DfT’s draft enhanced specification (see below).

**1.9** The following terms will be used to describe possible standards for accessible taxis:

- **DfT's draft interim standard** – this is a draft standard that the DfT proposes putting forward. The technical specification would improve the accessibility of licensed taxis for some wheelchair users and people with an ambulatory disability. The majority of vehicles currently available on the market would meet the proposed interim standard. However, a significant minority would not;
- **DfT's draft enhanced standard** – this is a draft standard that the DfT proposes putting forward as an aspirational technical specification. It would improve the accessibility of licensed taxis for the vast majority of wheelchair users and people with an ambulatory disability. Vehicles would need to be designed or redesigned to meet some of the specification. At present, there are no vehicles available to the taxi trade which would meet all of the requirements of the proposed specification.

**1.10** The Government remains committed to improving access to taxis. It is therefore publishing this consultation package, which includes an Impact Assessment and the draft technical specifications mentioned above, with the aim of:

- improving access to taxis so that people with different types of impairment or disability can receive an equal level of service provision and improved access to jobs, services, leisure facilities and social networks;
- agreeing draft technical standards for accessibility in taxis and seeking agreement on whether these should be issued as guidance or introduced as a regulation;
- identifying the costs and benefits of potential options through the Impact Assessment, and making all the evidence available, to help inform discussions and decisions;
- exploring issues and options in relation to enforcement, driver training and links with other local transport policies and initiatives.

- 1.11** This consultation is not considering some of the wider issues that might relate to taxi policy and licensing. The DfT is intending to re-issue its best practice guidance on taxi and private-hire licensing later in 2009.

## Who needs to read and contribute to this consultation?

- 1.12** We would particularly welcome responses to this consultation from:

- disabled people or their representative groups;
- taxi and private hire vehicle drivers or operators;
- vehicle manufacturers;
- local authorities and/or local licensing authorities; and
- those responsible for the management and operation of a major transport interchange.

- 1.13** The DfT will be arranging a number of consultation seminars during the consultation period, where those affected by the consultation will have an opportunity to voice their opinions directly to the Department. Please check the DfT website for details.

## How do I respond to the consultation?

- 1.14** Responses to this consultation should be sent by 24 April 2009 to:

Paul Lawry  
Accessibility and Equalities Unit  
Department for Transport  
2/25 Great Minster House  
76 Marsham Street  
London SW1P 4DR

Email: [taxiconsultation@dft.gsi.gov.uk](mailto:taxiconsultation@dft.gsi.gov.uk)

## Confidentiality

- 1.15** In line with DfT's policy of openness, at the end of the consultation period copies of the responses we receive may be made publicly available through the Department's website. The information they contain may also be published in a summary of responses. If you do not consent to this, you must clearly request that your response be treated confidentially. Any confidentiality disclaimer generated by your IT system in e-mail responses will not be treated as such a request. You should also be aware that there may be circumstances in which DfT will be required to communicate information to third parties on request, in order to comply with its obligations under the Freedom of Information Act 2000.
- 1.16** If you have any queries about this consultation you should contact Paul Lawry, 0207 944 0586. Complaints relating to this consultation should be sent to Nigel Dotchin, Department for Transport, Great Minster House, 76 Marsham Street, London, SW1P 4DR. Government consultation guidelines can be found at: [www.cabinetoffice.gov.uk](http://www.cabinetoffice.gov.uk)

## Geographical coverage

- 1.17** This consultation covers England, Wales and Scotland. The legislation contained in the Disability Discrimination Act is a reserved matter, that is, the responsibility of the UK Government. The DfT is also responsible for taxi licensing policy for England and Wales. Taxi licensing itself is a matter for individual licensing authorities under the Town Police Clauses Act 1847 and supplementary powers under the Local Government (Miscellaneous Provisions) Act 1976. The Welsh Assembly Government has agreed to engage with the DfT and other devolved administrations to explore how access to taxis could be improved. In Scotland, the licensing of taxis and private hire cars and their drivers is the responsibility of local authorities under powers set out in the Civic Government (Scotland) Act 1982 and associated Regulations. Within this legislative framework, local authorities have discretion to decide the

licensing arrangements appropriate for the needs and circumstances of their area. The Scottish Government has also agreed that this consultation package can cover Scotland. In Northern Ireland, the Department of the Environment is responsible for taxi regulation as a transferred matter.

## Next steps

- 1.18** Following this consultation, the Government will analyse the responses and publish a strategy in spring 2009. Any legislative changes will be taken forward at the earliest opportunity.

## Summary of questions in the consultation document

- Q1:** What is your view of the analysis and data included here and in the Impact Assessment? Do you have any further or more accurate data that you would be able to send us?
- Q2:** What do you think are the potential impacts, costs and benefits of the 'do nothing' scenario?
- Q3:** Do you have any further or more accurate data on potential costs and benefits of a 'do nothing' scenario that you would be able to send us?
- Q4:** What type of guidance would be most effective, in what format should it be produced and what can the DfT do to promote take-up?
- Q5:** What do you think of the draft technical specification? Do you think that it would help to improve levels of accessibility? Which aspects of it could be delivered easily and which ones would be problematic?
- Q6:** What do you think are the advantages and disadvantages of DfT-funded demonstration schemes?
- Q7:** What do you think would be the most effective ways of influencing action by local licensing authorities, drivers and manufacturers?



- Q8:** What are your views on the Government's proposal to amend and commence section 36 of the Disability Discrimination Act? This would impose a duty on drivers of taxis and private hire vehicles that are designated as being wheelchair accessible to assist passengers in wheelchairs, to carry them in safety and comfort and to not charge them any extra.
- Q9:** What additional enforcement action or tools would be the most effective ways of improving driver behaviour and attitudes?
- Q10:** What measures do you think could act as positive incentives to improve driver behaviour and the levels of service offered to disabled people?
- Q11:** In relation to improving access to taxis, what do you think the DfT and local licensing authorities could do better or more effectively?
- Q12:** How could we help to increase the availability of accessible taxis and private hire vehicles at ports, airports, bus and rail stations?
- Q13:** How could we improve the consistency and quality of information provided to disabled people about taxis?
- Q14:** What do you think are the potential impacts, costs and benefits of a proactive programme of DfT-led initiatives?
- Q15:** Do you have any further or more accurate data on potential costs and benefits of a programme of DfT led initiatives that you would be able to send us?
- Q16:** What do you think about the draft technical specification?
- Q17:** What do you think are the potential impacts, costs and benefits of a regulation?
- Q18:** Do you have any further or more accurate data on the potential costs and benefits of a regulation that you would be able to send us?
- Q19:** How do you think that a technical standard should be enforced?



## 2. Improving access to taxis

- 2.1** This part of the consultation document will consider in more detail the options for Government action and what we can do to improve access to taxis.

### Legislative background

- 2.2** To help overcome some of the barriers preventing disabled people from travelling, Part 5 of the Disability Discrimination Act (DDA) 1995 gave the Government the power to introduce accessibility regulations for several land-based modes of transport. The original intention of the powers was to enable disabled people to travel between train, bus and taxi easily, and to be able to hail a taxi in the street or go to a taxi rank and be able to find a taxi that met their needs. The powers available in the Disability Discrimination Act 1995 do not cover private hire vehicles, as it was felt that people pre-booking these services could specify at the time of booking that they needed a particular type of vehicle.
- 2.3** The Government has used its powers under Part 5 of the 1995 Act to introduce regulations for trains and trams and for buses and coaches. Regulations applying Part 3 of the 1995 Act to vehicles used to provide public transport services, including taxis and private hire vehicles, hire services and breakdown services also came into force on 4 December 2006. Taxi drivers now have a duty to ensure disabled people are not discriminated against or treated less favourably. In order to meet these new duties, licensing authorities are required to review any practices, policies and procedures that make it impossible or unreasonably difficult for a disabled person to use their services. Guidance and a Code

of Practice to explain the Part 3 duties for the transport industry that was produced by the Disability Rights Commission is available from the Equality and Human Rights Commission.<sup>1</sup>

**2.4** However, no regulations have been developed or made under Part 5 of the 1995 Act for licensed taxis. This project has proven to be complex for the following reasons:

- Sections 32–35 of Part 5 of the 1995 Act gives the Secretary of State powers to make regulations for the purpose of making it possible:
  - for disabled people to get in and out of taxis in safety; and to be carried in safety and in reasonable comfort; and
  - for disabled people in wheelchairs to be conveyed in safety into and out of taxis while remaining in their wheelchairs, and to be carried in taxis in safety and in reasonable comfort while remaining in their wheelchairs.
- at the time of the 1995 Act, it was thought that a taxi could be designed and manufactured that would meet the needs of all disabled people, including wheelchair users and people with an ambulatory disability. However, the challenges and potential costs involved in designing and manufacturing a taxi that would meet the needs of a majority of disabled people have proven to be significant, set against the potential market for such vehicles, which is currently quite low;
- the licensed taxi trade is quite disparate, a significant minority of drivers operate from a low economic base, particularly in rural areas, and many compete with or are able to transfer easily to the private hire sector;
- we do not know the extent to which disabled people want wheelchair accessible taxis, given that such vehicles may not meet the needs of many disabled people. Further work is needed on this point;

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<sup>1</sup> [www.equalityhumanrights.com/en/publicationsandresources/Pages/CoPtransport.aspx](http://www.equalityhumanrights.com/en/publicationsandresources/Pages/CoPtransport.aspx)

- evidence from the Impact Assessment is highlighting the need for more policy-based solutions that cover both licensed taxis and the private hire fleet, rather than an engineering-led solution that would only focus on part of the trade. There is also a need for local flexibility to reflect local circumstances and needs; and
- we need to meet the aims of other Government policies, for example, the objectives of the better regulation agenda, which is about ensuring that government departments consider in full the potential costs and benefits of any regulation on the private and public sector, including potential enforcement costs and impacts on carbon emissions.

**2.5** Since 1995, the DfT has consulted informally on the issue of improving access to taxis, we have commissioned research to inform the development of a technical specification and we have participated in work being taken forward by the European Conference of Ministers of Transport (ECMT)<sup>2</sup> on accessible taxis. A full bibliography of the research and other work can be found at Annex A.

**2.6** Section 36 of Part 5 of the 1995 Act includes additional powers for the Secretary of State to impose a duty on the driver of a taxi that falls within the definition of any regulations made under sections 32 to 35 to:

- carry the passenger while he remains in his wheelchair;
- not to make any additional charge for doing so;
- if the passenger chooses to sit in the passenger seat, to carry the wheelchair;
- to take such steps as are necessary to ensure the passenger is carried in safety and in reasonable comfort; and

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<sup>2</sup> European Conference of Ministers of Transport, 2007. Improving Access to Taxis.

- to give such assistance as might reasonably be required:
  - to enable the passenger to get in and out of the taxi;
  - if the passenger wishes to remain in his wheelchair, to enable him to be conveyed into and out of the taxi while in his wheelchair;
  - to load the passenger's luggage into and out of the taxi; and
  - if the passenger does not wish to remain in his wheelchair, to load the wheelchair into and out of the taxi.

**2.7** Failure to observe this duty would be a criminal offence and, on conviction, a driver could face a fine of up to £1,000. A local licensing authority would be able to take a prosecution on behalf of a disabled person. The authority would also be able to exempt a person from the duties on medical grounds, or on the grounds that his physical condition would make it impossible or unreasonably difficult for him to comply with the duties.

**2.8** The Government has not so far commenced this section of the 1995 Act, as it is currently linked to the existence of regulations made under sections 32–35 of the Act, which have not been made. The Local Transport Act 2008 includes a limited amendment to section 36. The amendment applies the section 36 duties to drivers of taxis and private hire vehicles who are providing local bus services – known as taxi-buses – using a wheelchair accessible vehicle. In these cases, the local licensing authority maintains a list of taxi-buses that are identified by the authority as being wheelchair accessible. The amendment came into effect on 26 January 2009. It will apply to PHV-buses when the relevant provisions in the Local Transport Act have been commenced and we have made the necessary regulations. We intend to do so by spring 2009.

**2.9** During discussions on the Local Transport Act, it became clear that disabled people and local licensing authorities were keen to see commencement of section 36 as an additional enforcement tool.

## What is the make-up of the current licensed taxi fleet?

**2.10** The make-up and nature of the current licensed hackney fleet are as follows:

- the UK has more wheelchair accessible taxis than most EU nations;
- there are currently approximately 85,000 licensed taxis in Great Britain. Of these, 40,285 are classed as being wheelchair accessible. Of these, the DVLA's registrations database suggests that there are 8,442 Fairway and 3,565 Metrocab vehicles still in use in the UK. These vehicles would not meet the requirements specified in the DfT's draft interim standard, but it is expected that they will be replaced by 2015 as they come to end of their economic life;
- there are approximately 140,000 private hire vehicles in Great Britain, approximately 45,000 of which are in Greater London;
- Greater London has 21,596 wheelchair accessible taxis. Other cities with licensed taxi fleets made up entirely of wheelchair accessible taxis include Liverpool, Manchester and Edinburgh;
- there is one main manufacturer of purpose-built wheelchair accessible taxis and a number of small companies who convert standard production vehicles into wheelchair accessible taxis;
- a new wheelchair accessible taxi (either purpose-built or a converted multi-purpose vehicle) can cost between £20,000 and £30,000. The second-hand market for these vehicles is small, as consultation with manufacturers suggests that a driver tends to purchase such a vehicle new and then keeps it until the end of its life (typically for 12 years);
- approximately 2,500 new wheelchair accessible taxis are sold each year;

- the typical purchase cost of a second-hand saloon car for use as a taxi is between £6,000 and £8,000. Drivers of these vehicles tend to buy second-hand cars when they are three years old and sell them on (for very little) at seven years old;
- annual running costs tend to be higher for wheelchair accessible taxis (typically just over £1,000 per year more than for drivers of saloon cars);
- the taxi trade can change rapidly and is relatively volatile. The market in urban areas, especially in Greater London, is vastly different from the market in areas with lower population numbers. Many licensed taxi drivers also hold private hire vehicle driver licences and would easily be able to transfer from the licensed hackney to the private hire sector if they wished;
- 64 out of 342 local licensing authorities in England and Wales have implemented a policy of licensing only wheelchair accessible taxis;
- there is no direct correlation between the population size of a local authority and the size of its taxi fleet. There is no direct correlation between the size of taxi fleet and how accessible it is;
- other factors can influence disabled people's use of taxis, for example, driver training and behaviour, links with the physical environment at taxi ranks, links with wider local transport policies and financial incentives or user subsidies like taxi-card schemes; and
- current technical standards used by local licensing authorities are variable.

**2.11** It is clear from the data that there are certain risks that the Government wishes to avoid in taking this work forward. We do not want to pursue any policies that might lead to fewer wheelchair accessible taxis being available. We do not want to create any difficulties for a local licensing authority who may have already adopted a policy of only licensing wheelchair accessible

taxi. We also do not want to implement a policy that might mean licensed hackney drivers transfer en masse into the private hire sector or leave the industry altogether. What we do want to achieve is an improvement in technical standards, for more taxis to be available to disabled people so that they can have improved access to jobs, services and social networks, and for the taxi trade to remain viable. We also want to continue to permit local licensing authorities to impose their own conditions to suit their own local circumstances, and for other aspects of the journey to be improved, for example boarding, driver assistance, and interchange with other public transport modes.

**Q1: What is your view of the analysis and data included here and in the Impact Assessment? Do you have any further or more accurate data that you would be able to send us?**

## Options

**2.12** As noted above, the Government remains committed to improving access to taxis. This consultation document and the Impact Assessment bring together the findings from work and research that have been carried out by the Department and others, and it puts forward options for taking this issue forward.

**2.13** The options are:

- a ‘do nothing’ option – that is, leaving the market, the trade and local licensing authorities to continue to make local decisions on the make-up of the taxi and private hire fleet and levels of accessibility, without any additional Government guidance or intervention;
- implementing a pro-active programme of DfT led initiatives that would involve measures such as issuing technical standards as an advisory note, guidance to local licensing authorities, a demonstration scheme, additional enforcement provisions and making best use of other Government policy levers; and



- regulation: either using the regulation-making powers that are currently in part 5 of the Disability Discrimination Act 1995, or seeking new or amended regulatory-making powers at the next legislative opportunity.

**2.14** The following parts of this consultation document consider, firstly, the potential impacts, costs and benefits of the ‘do nothing’ option, then the additional potential impacts, costs and benefits of the DfT-led proactive programme, and finally the additional potential impacts, costs and benefits of a regulatory approach.

## The potential impacts, costs and benefits of a ‘do nothing’ approach

**2.15** The Impact Assessment contains an annex that summarises the analysis and the assumptions behind the ‘do nothing’ scenarios that are explored in the Assessment. Based on existing data, we have assumed that:

- mid to low growth scenarios estimate that it would take 20–30 years to achieve a licensed taxi fleet that was totally made up of wheelchair accessible taxis, if the policy was to leave the market, the trade and local licensing authorities to continue to make local decisions on the make-up of the taxi and private hire fleet and levels of accessibility without any additional Government guidance or intervention;
- levels of accessibility would be no greater than is currently the case – that is, in terms of the number of people being able to fit into taxis while remaining seated in their wheelchairs. Levels of accessibility for people with an ambulatory disability might be reduced if the licensed fleet was only made up of wheelchair accessible taxis;
- the ‘do nothing’ scenario is unlikely to meet Government objectives or the needs and expectations of disabled people.



**Q2:** What do you think are the potential impacts, costs and benefits of the 'do nothing' scenario?

**Q3:** Do you have any further or more accurate data on potential costs and benefits of a 'do nothing' scenario that you would be able to send us?

## The potential impacts, costs and benefits of a proactive programme of DfT-led initiatives

**2.16** To help achieve the objectives of this project and improve access to taxis, the DfT could lead the development and implementation of a programme of initiatives to provide solutions to specific issues. The paragraphs below outline the measures that could be included in this package.

**2.17** The DfT could develop a comprehensive package of **guidance** to local licensing authorities and other stakeholders. It could be issued as supplementary advice on how to discharge existing duties under Part 3 of the 1995 Act. It could include:

- examples of good practice; and
- advice on issues like service levels, the preferred make-up of the fleet to meet the needs of people with different types of disability, procurement policies, how to improve joint working with local transport providers and other local authorities, and enforcement and inspections.

**2.18** The guidance could be applied to the private hire fleet as well as to licensed taxis. It would be publicised, made available on the internet, through sites such as Direct.gov, and kept up to date.

**Q4:** What type of guidance would be most effective, in what format should it be produced and what can the DfT do to promote take-up?

**2.19** The DfT could issue the attached draft **technical specification** as an advisory note for licensing authorities to take account of when licensing particular vehicles, and for manufacturers to consider in the future development of vehicles. We would also continue research as and where necessary into safety issues and to issue guidance on links with the EU type approval process.

**Q5:** What do you think of the draft technical specification? Do you think that it would help to improve levels of accessibility? Which aspects of it could be delivered easily and which ones would be problematic?

**2.20** The DfT could fund some **demonstration schemes**. We could work with three or four local authorities representing, for example, rural areas, small towns and suburban areas, to look at how access to taxis could be improved. We could jointly develop practical advice on, for example, developing business cases, quantifying benefits, carrying out local accessibility demand surveys to identify in greater detail the needs and requirements of local disabled people, joint working, and how to make best use of links with the local transport planning system. We could also consider including driver training or awareness raising exercises as part of a scheme and we could assess their effectiveness. Advice could then be publicised and made available to other local authorities, and those that had participated in the schemes could act as mentors or advisers to others.

**Q6:** What do you think are the advantages and disadvantages of DfT-funded demonstration schemes?

**2.21** The DfT could consider how we can **strengthen links** between the provision of more accessible taxis and the local transport planning regime. The DfT is due to consult in 2009 on guidance for LTP3.

**2.22** The DfT, local authorities and others could consider in detail the potential costs and benefits of national and/or local **financial or other incentives** to encourage drivers and operators to purchase vehicles that offered greater levels of accessibility. For example, it has been suggested that there should be reduced Vehicle Excise Duty for taxis designated as being accessible, or there could be reduced licence fees, or accessible taxis could be allowed access to all areas – for example, interchanges that are currently only serviced by private hire vehicles or bus lanes.

**Q7: What do you think would be the most effective ways of influencing action by local licensing authorities, drivers and manufacturers?**

**2.23** The DfT could consider additional action on **enforcement**. Paragraphs 2.6–2.8 above discuss section 36 of the 1995 Act and duties that it would place on taxi drivers to assist people in wheelchairs. The Government believes that it ought to amend this section to enable these duties to be imposed separately to any action that might or might not be taken on the regulations. Primary legislation is needed to make such an amendment. The Government also believes that the duties to assist passengers in wheelchairs, to carry them in safety and in comfort and to not charge them an additional fare should apply to drivers of both licensed taxi drivers and drivers of private hire vehicles. Such vehicles could be designated as being wheelchair accessible by the local licensing authority. The Impact Assessment considers the potential costs and benefits of such an option. Applying the duty to all drivers of wheelchair accessible taxis would bring the legislation into line with the law on the carriage of guide dogs and hearing dogs, and it would provide local licensing authorities with an additional enforcement tool.

**2.24** Some stakeholders have suggested that local authorities could make better use of their existing enforcement powers, and that they could link up more effectively with other enforcement areas for which the local authority is responsible. For example, some

drivers have received parking tickets for taking extra time to set down or pick up a passenger in a wheelchair. They believe that this is an unfair practice and that local authorities should change their parking enforcement policies. The DfT could include advice on these issues in its guidance.

**2.25** The DfT could consider the penalties that would apply to offences under the 1995 Act and whether or not **alternative penalties** could result in improvements in driver behaviour. The penalties for sections 32–37 of Part 5 of the 1995 Act would currently involve prosecution through a magistrate’s court and a maximum fine of £1,000. The DfT and other Government departments have recently been considering the use of flexible or alternative penalties as a way of achieving longer-term changes in behaviour. For example, someone found guilty of a speeding offence can be given the option of attending a speed awareness training course which, typically, costs the same as an average speeding fine. Research into some of these schemes has shown that these courses can be an effective way of reducing repeat offences. For example, in Humberside, only 8 per cent of drivers who attended a speed awareness course were found to have offended again. In comparison, 25 per cent of those offenders who opted for a fine were found to have repeated the offence. A similar approach could be taken for offences under sections 32–37 of the Disability Discrimination Act 1995 whereby offenders could be given the option of attending a disability awareness course instead of a fine.

**2.26** Another approach being taken in some areas is to permit local enforcement officers to issue fixed penalty notices for minor breaches. Primary legislation would be needed to amend any aspect of the penalty regime for Part 5 of the Disability Discrimination Act 1995.

**Q8:** What are your views on the Government's proposal to amend and commence section 36? This would impose a duty on drivers of taxis and private hire vehicles that are designated as being wheelchair accessible to assist passengers in wheelchairs, to carry them in safety and comfort and to not charge them any extra.

**Q9:** What additional enforcement action or tools would be the most effective ways of improving driver behaviour and attitudes?

**2.27** There are other measures that the DfT could promote more vigorously and encourage action by others.

**2.28** For example, the ECMT in its report, *Improving Access to Taxis*, concluded that **training in disability equality issues** for the taxi industry is essential. No matter how well a vehicle is designed, a taxi journey for a disabled person can be ruined by inappropriate behaviour or actions. Refusal to stop and pick up a disabled person can also mean they develop a negative view of the industry. All those involved in the industry, including operators and despatch centres, should have an appropriate level of training. The DfT's *Best Practice Guide for Taxi and Private Hire Vehicle Licensing* recommends training in customer care, including meeting the needs of disabled people. The DfT has funded work by GoSkills, the Sector Skills Council for passenger transport, to develop nationally recognised vocational qualifications for taxi drivers. This training should cover disability awareness.

**2.29** Inappropriate behaviour by those who work in the taxi trade towards disabled people needs to be overcome. There is simply no excuse, if a wheelchair accessible taxi is available, for refusing to pick up a person in a wheelchair. The DfT has also heard examples of drivers refusing to take people with mobility impairments such as arthritis the short distances they need to travel. We have heard a number of excuses for poor behaviour –

for example, drivers who do not think they are insured, who are worried they might injure themselves assisting people in wheelchairs in and out of the taxi (many wheelchair users do not need assistance, simply a working ramp), who do not want to spend the time waiting for disabled people to get in and out, who think that it will cost them money, etc. Many of these issues can be overcome by training and by raising awareness, improving drivers' confidence and overcoming common misunderstandings. Disabled people are likely to be a growing part of the potential market for the taxi trade in the future, so it also makes good business sense to improve the way the industry meets their needs.

**2.30** Some local authorities are actively taking forward driver training. For example, Merseytravel, GoSkills and UnionLearn have been working closely to support a programme of driver training in the Greater Merseyside area. Some others are making training a requirement of their licensing conditions. Others use enforcement and a points system in response to complaints made about drivers. We would be interested to receive comments and views on how we and local licensing authorities can encourage the taxi industry to take a more positive and proactive approach to meeting the needs of disabled people. We would particularly welcome ideas for ways of encouraging good behaviour, for example codes of practice, voluntary quality assurance schemes, local awareness initiatives, or use of new technology in booking systems.

**Q10: What measures do you think could act as positive incentives to improve driver behaviour and the levels of service offered to disabled people?**

**2.31** Local authorities have a key role to play in improving access. The **role of the licensing officers** is obviously critical in ensuring that they understand the demand and needs of their local communities, ensuring an effective balance between the licensed and private hire fleets, enforcement, training and in



communicating changes to the local taxi trade. They should ensure that they keep up to speed with good practice guidance and that they co-ordinate and work jointly where appropriate with neighbouring authorities.

**2.32** There are other links that need to be made to other aspects of local transport policies. For example, the ECMT report concludes that the infrastructure within which taxis operate is critical to their use by disabled people. The report highlights good practice in relation to location of ranks, the provision of sheltered seating close to a rank, information provision, kerb heights and pavement widths. Some local authorities are already making the links between local taxi service provision, local transport planning and local area agreements and taking a more strategic, long-term view of taxi provision, but more could be done.

**Q11:** In relation to improving access to taxis, what do you think the DfT and local licensing authorities could do better or more effectively?

**2.33** We appreciate that the private sector is involved in the provision of taxi services at many **transport interchanges**. One of the original aims of the Disability Discrimination Act 1995 was to enable disabled people to transfer between transport modes easily. The operators of some stations and airports have contracts with private hire companies and do not permit ranks for licensed hackney carriages. In these cases, accessible taxis ought to be available<sup>3</sup> but, often, passengers arriving do not know beforehand that they need to pre-book, how to do it, or they may have some difficulty communicating their needs over the telephone.

**2.34** Section 33 of the 1995 Act originally envisaged that any taxi regulations would apply to ‘franchise agreements’, that is contracts entered into by an operator of a designated transport

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<sup>3</sup> In the case of airport operators, the DfT has recently published, *Access to Air Travel for Disabled Persons and Persons with Reduced Mobility – Code of Practice*, July 2008. This includes advice for arrival and departure at airports.

facility (port, airport, railway station or a bus station) with a provider of hire car services. The Government was given a power to include conditions in any regulations about the type of taxis that needed to be available at these facilities. This section has also not been commenced, as it is reliant on the existence of regulations made under section 32 of the 1995 Act which have not been made. We are interested in your views about how to take this issue forward. Would guidance from the DfT to operators of such transport facilities help to ensure better provision of accessible taxis or should we still consider the need for legislation in this area?

**2.35** The lack of **information** about what can be expected at particular points in a journey, and the lack of consistency, can be other factors that suppress travel by disabled people. The lack of certainty can affect their confidence and ability to travel. Inadequate provision at one end of a journey can also negate good provision at the other, since people will not make the trip if they cannot arrive easily at their destination or, if they have a bad experience, they will not make the trip again.

**Q12:** How could we help to increase the availability of accessible taxis and private hire vehicles at ports, airports, bus and rail stations?

**Q13:** How could we improve the consistency and quality of information provided to disabled people about taxis?

**Q14:** What do you think are the potential impacts, costs and benefits of a pro-active programme of DfT led initiatives?

**Q15:** Do you have any further or more accurate data on potential costs and benefits of a programme of DfT led initiatives that you would be able to send us?



## The potential impacts, costs and benefits of regulation

**2.36** In addition to the package of DfT-led initiatives, the DfT could seek a regulation in this area, either using the existing powers set out in sections 32–35 of the Disability Discrimination Act 1995, or we could seek additional or amended powers through primary legislation.

**2.37** The powers in the 1995 Act originally envisaged that it would be possible to have one vehicle type that would meet the needs of the majority of disabled people. Since the Act came into force, the DfT has commissioned research to inform the development of a possible technical standard. This research is listed in the bibliography at Annex A. The DfT has also held discussions with manufacturers and with other European colleagues as part of the work carried out by the ECMT.<sup>4</sup> These discussions suggested that achieving one vehicle type would mean either designing and developing a completely new taxi vehicle, or modifying a light commercial vehicle with a higher roof line. Developing a completely new vehicle was estimated to cost in excess of £100 million. This was not considered by the ECMT to be a viable proposition, given the size of the taxi market.

**2.38** The ECMT considered the alternative of converting a light commercial vehicle, but it found there were disadvantages with this approach if a vehicle of this type were to be thought of as a universal replacement for conventional taxis. The responses they received from motor manufacturers at the time suggested that they would not be interested in mass-producing a taxi vehicle. This led the ECMT to the conclusion that, by process of elimination, the only means of producing a vehicle that met the required standard was by post-manufacture conversion. But, again, there were a number of problems with this approach. Both vehicle manufactures and conversion specialists were of the opinion that such conversions would be too expensive, both in

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<sup>4</sup> European Conference of Ministers of Transport, 2007. *Improving Access to Taxis*.

initial purchase costs and in running costs. There were also concerns that such a vehicle would not appeal to the majority of taxi drivers and might not appeal to all passengers.

- 2.39** Some experts engaged in this field still believe that it would be possible to overcome the design and manufacturing problems if sufficient lead times were provided, some sort of financial incentive could be provided to help offset some of the additional costs and if some guarantee of a market could be given by, for example, issuing a regulation.
- 2.40** The DfT has developed a draft technical specification based on research and informal consultation. It sets out a two-staged approach. **The initial specification** sets out the standards that could be achieved easily and relatively quickly, especially as much of the current fleet would already meet the standard. Two notable exceptions, however, would be the existing Fairway and Metrocabs. These would not meet the suggested minimum doorway widths. However, no new Fairways or Metrocabs have been manufactured since 1997 and 2003 respectively, so many of these vehicles are likely to reach the end of their economic life by 2015.
- 2.41** The draft specification sets out possible requirements for wheelchair accessibility, ambulatory accessibility, and general accessibility requirements for disabled people. It does not specify that all these requirements should be met in one vehicle. They could potentially be applied separately to wheelchair accessible taxis and to, for example, saloon cars that might meet the ambulatory accessibility requirements.
- 2.42** The **enhanced specification** is intended to move the standard towards a design that would meet the majority of disabled people's needs and one that was envisaged in the 1995 Act. The enhanced specification would be something that might be achieved over a longer time period and it is intended to be ambitious and to stimulate innovation. The wheelchair accessibility requirements are based on the dimensions of a reference wheelchair. These are the same dimensions on which

regulations for buses and trains are based and would mean that most, but not all, manual and electric wheelchairs would fit into the space.

**Q16: What do you think about the draft technical specification?**

**2.43** The DfT believes that there are the following regulatory options:

- we could draft and implement a regulation that would make it mandatory for all licensed taxis to meet the requirements of the interim standard by a specified date. The Impact Assessment considers a compliance date of 2025; or
- we could draft and implement a regulation that would make it mandatory for all licensed taxis to meet the requirements of the enhanced standard by a specified date. Again, the Impact Assessment considers a compliance date of 2025; or
- we could implement a regulation according to, for example, whether an area is an urban authority or areas with high levels of limiting, long-term illness. The Impact Assessment uses a compliance date for this option of between 2012 and 2020. We have concluded that regulating for a certain proportion of the fleet being wheelchair accessible and a certain proportion being saloon cars would be unworkable, as it would be open to legal challenge and there would be practical implementation problems. We would need to amend the existing regulation-making power through primary legislation to take this option forward.

**2.44** The Impact Assessment shows that the costs of regulating in whatever form would be significant. The net cost of adopting an interim standard is estimated to be £453 million. The net cost of adopting an enhanced standard is estimated at £772 million. And the net cost of implementation in urban areas is estimated at £197 million. It has proven to be very difficult to quantify benefits, although figurative/scoping exercises suggest that they would be many magnitudes lower than the costs. Even if we

were able to quantify the benefits through further work, it is likely that the potential costs would still mean any form of regulation would be very expensive.

**2.45** It could be argued that regulation is necessary in this area to help guarantee certain levels of accessibility, to improve certainty and reliability and to level the playing field for manufacturers and the taxi industry. But the following issues would also need to be considered:

- any regulation would focus on the standards of the vehicle. It would not necessarily deliver the outcomes that are required;
- any regulation is likely to involve high costs;
- any regulation could have high impacts. For example, the costs involved could potentially mean that all licensed taxi drivers would simply move to the private hire sector or would leave the industry altogether. Some of the regulatory options could also be high impact in carbon terms;
- options for offsetting costs are minimal; and
- implementation could be problematic in terms of agreeing appropriate dates. Implementation in some areas but not others could create difficulties, for example, for licensed taxi drivers who work in different local authority areas, and in agreeing an appropriate basis on which to allow local flexibility.

**Q17:** What do you think are the potential impacts, costs and benefits of a regulation?

**Q18:** Do you have any further or more accurate data on potential costs and benefits of a regulation that you would be able to send us?

- 2.46** If we were to agree a technical standard and introduce it as a regulation, we would need to consider the issues of initial and ongoing compliance. It would be relatively easy to ensure that vehicles newly licensed complied with a regulation, but it would also be important to ensure continued compliance.
- 2.47** At present, vehicles are subject to a class IV MOT inspection, which assesses the mechanical condition of the vehicle. This is undertaken once a year. Taxis need to have an MOT certificate or a certificate of compliance from the first year onwards. A 'supplementary' or 'hackney' inspection is also carried out at the time of the MOT which will, for example, assess interior and exterior condition and other items such as cleanliness and wheelchair tie-downs. The items assessed as part of the supplementary inspection vary between local licensing authorities. In some cases, local licensing authorities can demand both an MOT and a supplementary/hackney inspection to be carried out more than once a year if a taxi is a particular age or it has reached a particular mileage.
- 2.48** The variation in requirements for supplementary or hackney inspections can mean that a driver operating across boundaries can be subject to different standards, unless recognition agreements exist. There is also variation in enforcement. Some local licensing authorities conduct the MOT and supplementary/hackney inspections at their own premises, with their own staff. Others have subcontracted the work to regulatory bodies such as VOSA or to the private sector.
- 2.49** The following options could be considered as ways of enforcing a technical standard.
- an initial compliance inspection at the time of registration supported, as now, by spot checks or intelligence/complaint led checks carried out by local authority officers or other agencies like VOSA. This approach would guarantee compliance at the time of registration only, but it would place the responsibility for compliance on the owner of the vehicles and it would be a low-cost enforcement option;

- a national, standard list of items to be checked at the time of the annual supplementary or hackney test to prove compliance with the technical accessibility standard could be developed and implemented by each local licensing authority. This would provide for compliance to be checked on an annual or more regular basis and would provide a consistent approach across the UK. But implementation might require a change in legislation, and it would involve additional cost for the drivers and for inspectors, as they would need to be trained in any new annual accessibility check; and
- a national, standard list of items that could be checked at the time of the annual supplementary or hackney test could be developed by the DfT and issued as good practice to be adopted on a voluntary basis by local licensing authorities. This could still be supported by spot checks or intelligence/complaint led enforcement.

**2.50** The Impact Assessment considers some of the potential costs and benefits of these options. It is likely that enforcement would be easier if all licensed hackney taxis were subject to the same standard.

**Q19:** How do you think that a technical standard should be enforced?

## Summary of options

Desired outcome	Could it be achieved by regulation?	Could it be achieved by another measure?
<p>More taxis available for disabled people, including:</p> <p>(a) wheelchair users;</p> <p>(b) people with an ambulatory disability.</p>	<p>In conjunction with other measures (e.g. section 36 duty to assist wheelchair users) – yes, but high implementation cost could mean fewer licensed taxis available as drivers move to PHV sector. Movement out of licensed hackney trade likely to be highest where trade is least buoyant (e.g. rural areas).</p>	<p>(a) More detailed local accessibility demand surveys could lead to more targeted provision of type of taxis needed in areas where they are needed.</p> <p>(b) Guidance issued by DfT, stronger links to local strategic transport planning or DfT-funded demonstration schemes could improve numbers available.</p> <p>(c) National or local financial or other (e.g. use of bus lanes) incentives could help influence purchase decisions by drivers and operating companies.</p>

Continued

<b>Desired outcome</b>	<b>Could it be achieved by regulation?</b>	<b>Could it be achieved by another measure?</b>
More accessible taxis and private hire vehicles available for people with all types of disability at interchanges and/or ranks.	Perhaps. Existing regulatory powers for setting standards apply to licensed taxis only. But there are supplementary powers in the DDA that, if in place, could mean certain conditions could be applied to contracts between interchange operators and the PHV sector.	<p>(a) Guidance issued by the DfT, stronger links to local strategic transport planning or DfT-funded demonstration schemes could improve numbers available at specific locations.</p> <p>(b) Greater engagement or joint working between local authority and transport interchange operators could meet this objective.</p>
Improved kerbside infrastructure, information and waiting areas at ranks and interchanges.	No. Existing regulatory powers only apply to potential standards for licensed taxis.	<p>(a) Local authorities could use local transport planning and funding regime to improve infrastructure, inform and educate drivers on how to use infrastructure, and enforce requirements.</p> <p>(b) Greater engagement or joint working between local authority and transport interchange operators could meet this objective.</p>

Continued



Desired outcome	Could it be achieved by regulation?	Could it be achieved by another measure?
More accessible taxis available for people with all types of disability that can be hailed on street.	No. Regulations could not guarantee that more accessible taxis would be available for all types of disability. In some areas, local policies have led to more wheelchair accessible taxis being available, but existing vehicles may not be suitable for all wheelchair users. The high implementation cost involved in delivering the DfT's draft enhanced standard could lead to drivers moving to the PHV sector.	<p>(a) More detailed local demand surveys could lead to more targeted provision of type of taxis needed in areas where they are needed.</p> <p>(b) Guidance issued by DfT, stronger links to local strategic transport planning or DfT-funded demonstration schemes could improve numbers available.</p> <p>(c) Better driver training and enforcement could mean that more drivers would stop and pick up some wheelchair users in areas where wheelchair accessible taxis are available.</p>

Continued

Desired outcome	Could it be achieved by regulation?	Could it be achieved by another measure?
Wheelchair accessible taxis accommodate a greater percentage of wheelchair users.	Possibly, but high costs would be involved for manufacturers in developing or adapting vehicles and in purchasing and upgrading the fleet.	<p>(a) DfT could issue technical standard as a voluntary advisory note and encourage take-up through guidance.</p> <p>(b) National or local financial incentives could help influence purchase decisions.</p>
Greater safety and comfort for disabled people travelling in taxis.	Possibly, but regulations would only apply to licensed taxi fleet. Improvements made to help some disabled people may make it more uncomfortable for other disabled people.	<p>(a) DfT could issue technical standard as a voluntary advisory note and encourage take-up through guidance.</p> <p>(b) Better driver training and enforcement could lead to improvements and greater consistency.</p>

Continued

Desired outcome	Could it be achieved by regulation?	Could it be achieved by another measure?
Improved driver behaviour and willingness to pick up disabled people.	No.	<p>(a) Better driver training and enforcement could lead to improvements and greater consistency.</p> <p>(b) DfT could amend and commence the duty to assist people in wheelchairs that is in section 36 of the Disability Discrimination Act 1995. DfT could also explore the use of alternative penalties.</p> <p>(c) Operators/drivers could set up an industry-led and managed quality assurance scheme.</p>
Greater certainty for disabled people planning trips and connections between transport modes.	No.	<p>(a) Improved and more accessible information provided by national and local organisations and transport providers.</p>

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# Annex B     Impact Assessment

## Summary: Intervention & Options

<b>Department / Agency:</b> Department for Transport	<b>Title:</b> Impact Assessment of Accessible Taxi Regulations	
<b>Stage:</b> Consultation	<b>Version:</b> 3	<b>Date:</b> 3rd November 2008
<b>Related Publications:</b> Consultation document on improving access to taxis. Draft technical specification.		

### Available to view or download at:

<http://www.dft.gov.uk/consultations>

**Contact for enquiries:** Paul Lawry, Dft

**Telephone:** 020 7944 05876

### What is the problem under consideration? Why is government intervention necessary?

This impact assessment relates to the need to improve access to licensed taxis to improve equality of opportunity for disabled people. Recently, a number of local authorities have implemented an accessible taxi policy. However, many authorities have not done so and, at the time of writing, only around 50 per cent of the national licensed taxi parc could be described as being wheelchair accessible. In one-third of taxi licencing authorities, less than 10 per cent of taxis are wheelchair accessible, whilst 16 authorities have none at all. Accessibility levels for other disabled people vary greatly.

### What are the policy objectives and the intended effects?

The objective of this policy is to improve access to taxis in the GB taxi fleet, in line with the overarching objectives of the Disability Discrimination Act (DDA) and Government commitments to improve access to jobs, services and social networks. Recent court cases have highlighted the contestability of local authority policies that require a proportion of a taxi fleet to be wheelchair accessible. Therefore, the effect of any regulation in this area, using powers in the DDA, would be to require compliance with an accessibility standard for the whole taxi fleet in a licencing authority area.

### What policy options have been considered? Please justify any preferred option.

1. Primary legislation is amended if necessary and commenced to allow local authorities to enforce section 36 of the DDA.
2. Introduction of an accessible taxi standard in line with the DfT's draft interim standard (i.e. the standard currently met by LTI TX vehicles) by 2025.
3. Introduction of a standard in line with the DfT's draft enhanced standard by 2025 (vehicles would have to be developed to meet this standard).
4. Application of the interim standard in urban areas and areas with high levels of illness by 2020.



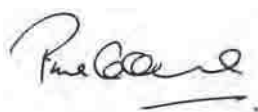
When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects?

The policy will be reviewed every two years through its implementation period to ensure progress is being made against the required conversion trajectory.

**Ministerial sign-off** For consultation stage Impact Assessments:

*I have read the Impact Assessment and I am satisfied that given the available evidence, it represents a responsible view of the likely costs, benefits and impact of the leading options.*

Signed by the responsible Minister:



4.12.2008

..... Date: .....

## Summary: Analysis & Evidence

Policy Option: 1	Description: <b>Primary legislation would allow local authorities to enforce duties on taxi and private hire drivers and operators using s36 of the DDA</b>
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COSTS	<b>ANNUAL COSTS</b>	Description and scale of <b>key monetised costs</b> by 'main affected groups' Local authorities will have to publicise the change and then prosecute where necessary. Prosecutions will also involve court costs. The appraisal here is presented over 12 years.	
	<b>One-off (Transition) Yrs</b>		
	<b>£ 219,000</b>	1	
	<b>Average Annual Cost (excluding one-off)</b>		
	<b>£ 201,000</b>	<b>Total Cost (PV)</b>	<b>£ 2,720,000</b>
Other <b>key non-monetised costs</b> by 'main affected groups' None.			

BENEFITS	<b>ANNUAL BENEFITS</b>	Description and scale of <b>key monetised benefits</b> by 'main affected groups' Research would be required to assess the level of annual benefits. However, we believe the additional enforcement of the powers and greater awareness of duties will bring about benefits to disabled travellers and provide consistency throughout GB. We have been unable to monetarise this cost.	
	<b>One-off Yrs</b>		
	<b>£ Not known</b>		
	<b>Average Annual Benefit (excluding one-off)</b>		
	<b>£ Not known</b>	<b>Total Benefit (PV)</b>	<b>£ Not known</b>
Other <b>key non-monetised benefits</b> by 'main affected groups' Disabled users of taxis will have greater consistency while travelling in taxis. We envisage that more trips will be undertaken as a result of commencement of this section of the DDA, as disabled users will have more confidence in using taxis and are afforded a level of protection.			

Key Assumptions/Sensitivities/Risks

Price Base Year 2008	Time Period Years 16	<b>Net Benefit Range</b> (NPV) <b>£ N/a</b>	<b>NET BENEFIT</b> (NPV Best estimate) <b>£ -2,720,000</b>
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What is the geographic coverage of the policy/option?	GB wide			
On what date will the policy be implemented?	2012			
Which organisation(s) will enforce the policy?	Local authorities			
What is the total annual cost of enforcement for these organisations?	£ 106,000			
Does enforcement comply with Hampton principles?	Yes			
Will implementation go beyond minimum EU requirements?	Yes			
What is the value of the proposed offsetting measure per year?	£ 0			
What is the value of changes in greenhouse gas emissions?	£ 0			
Will the proposal have a significant impact on competition?	No			
Annual cost (£-£) per organisation (excluding one-off)	Micro	Small	Medium	Large
Are any of these organisations exempt?	No	No	N/A	N/A

<b>Impact on Admin Burdens Baseline</b> (2005 Prices)			(Increase - Decrease)
Increase of £ 0	Decrease of £ 0	<b>Net Impact £ 0</b>	

**Key:** Annual costs and benefits: Constant Prices (Net) Present Value

## Summary: Analysis & Evidence

Policy Option: 2	Description: <b>Adoption of Interim Accessibility Standard (equivalent to that met by LTI TX-series vehicles).</b>
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COSTS	<b>ANNUAL COSTS</b>	Description and scale of <b>key monetised costs</b> by 'main affected groups'  The main affected group will be taxi owners who use saloon cars that are not wheelchair accessible. They will incur an increase in both purchase and running costs. Implementing the regulation would require replacement of 50 per cent of the GB taxi fleet with wheelchair accessible vehicles.	
	<b>One-off (Transition) Yrs</b>		
	<b>£ 630,000,000</b>	12	
	<b>Average Annual Cost (excluding one-off)</b>		
	<b>£ 41,000,000</b>	<b>Total Cost (PV)</b>	<b>£ 856,577,000</b>
Other <b>key non-monetised costs</b> by 'main affected groups' None.			

BENEFITS	<b>ANNUAL BENEFITS</b>	Description and scale of <b>key monetised benefits</b> by 'main affected groups'  The accessible taxis will have longer service lives than saloon cars. Drivers who convert will save on the cost of replacing a saloon car every four years (which they would do twice in the 12-year life span of an accessible taxi). There will also be a small (1 per cent) increase in turnover for drivers who convert.	
	<b>One-off Yrs</b>		
	<b>£ 0</b>		
	<b>Average Annual Benefit (excluding one-off)</b>		
	<b>£ 25,249,000</b>	<b>Total Benefit (PV)</b>	<b>£ 403,981,000</b>
Other <b>key non-monetised benefits</b> by 'main affected groups' Disabled users are the primary beneficiary and will benefit from increased choice in terms of public transport options and equality of opportunity.			

### Key Assumptions/Sensitivities/Risks

We have assumed that by 2025 all vehicles in use as licensed taxis will be compliant with the interim standard. We have assumed that the period over which the policy is implemented means costs associated with loss of usable life of saloon cars will be negligible. We have assumed no additional enforcement costs will occur.

Price Base Year	Time Period Years 16	<b>Net Benefit Range</b> (NPV) <b>£ N/a</b>	<b>NET BENEFIT</b> (NPV Best estimate) <b>£ -452,597,000</b>
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What is the geographic coverage of the policy/option?		GB		
On what date will the policy be implemented?		2012 to 2024		
Which organisation(s) will enforce the policy?		Local authorities		
What is the total annual cost of enforcement for these organisations?		£ 0 (additional)		
Does enforcement comply with Hampton principles?		Yes		
Will implementation go beyond minimum EU requirements?		Yes		
What is the value of the proposed offsetting measure per year?		£ 0		
What is the value of changes in greenhouse gas emissions?		£ tbc		
Will the proposal have a significant impact on competition?		No		
Annual cost (£-£) per organisation (excluding one-off)	Micro <b>£ 982</b>	Small	Medium	Large
Are any of these organisations exempt?	No	No	N/A	N/A

<b>Impact on Admin Burdens Baseline</b> (2005 Prices)		(Increase - Decrease)
Increase of £ 0	Decrease of £ 0	<b>Net Impact £ 0</b>

**Key:** **Annual costs and benefits: Constant Prices** **(Net) Present Value**

## Summary: Analysis & Evidence

**Policy Option: 3**      **Description: Adoption of full accessibility standard (equivalent to the “enhanced” standard).**

COSTS	ANNUAL COSTS		Description and scale of <b>key monetised costs</b> by ‘main affected groups’  Currently there are no vehicles available to the taxi trade which meet the wheelchair user standard which the DfT aspires to. A new model would need to be introduced – this is likely to cost more than the models that meet the interim standard.
	One-off (Transition)	Yrs	
	£ 1,054,000,000	12	
	Average Annual Cost (excluding one-off)		
	£ 41,000,000	Total Cost (PV)	£ 1,189,200,000
Other <b>key non-monetised costs</b> by ‘main affected groups’ Manufacturers would need to develop a new vehicle – but it is assumed development costs would be met by the increased purchase prices for the vehicles.			

BENEFITS	ANNUAL BENEFITS		Description and scale of <b>key monetised benefits</b> by ‘main affected groups’  The accessible taxis will have longer service lives than saloon cars. Drivers who convert will save on the cost of replacing a saloon car every four years (which they would do twice in the 12 year life span of an accessible taxi). There will also be a small (1.2 per cent) increase in turnover for drivers who convert.
	One-off	Yrs	
	£ 0		
	Average Annual Benefit (excluding one-off)		
	£ 26,078,000	Total Benefit (PV)	£ 417,255,000
Other <b>key non-monetised benefits</b> by ‘main affected groups’  This option would be expected to generate benefits around improved transport choice and enhanced quality of life for wheelchair users, although the extent of the value of these benefits is unknown.			

### Key Assumptions/Sensitivities/Risks

We have assumed that vehicles meeting the enhanced accessibility standard will cost around £30,000 each. Running costs will be equivalent to interim standard vehicles. All vehicles meeting the interim standard will have no economic life left at replacement between 2012 and 2024.

Price Base Year	Time Period Years 16	<b>Net Benefit Range</b> (NPV) <b>£ N/a</b>	<b>NET BENEFIT</b> (NPV Best estimate) <b>£ -771,946,000</b>
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What is the geographic coverage of the policy/option?			GB wide	
On what date will the policy be implemented?			2012 to 2024	
Which organisation(s) will enforce the policy?			Local authorities	
What is the total annual cost of enforcement for these organisations?			£ 0 (additional)	
Does enforcement comply with Hampton principles?			Yes	
Will implementation go beyond minimum EU requirements?			Yes	
What is the value of the proposed offsetting measure per year?			£ 0	
What is the value of changes in greenhouse gas emissions?			£ tbc	
Will the proposal have a significant impact on competition?			No	
Annual cost (£-£) per organisation (excluding one-off)	Micro £ 982	Small	Medium	Large
Are any of these organisations exempt?	No	No	N/A	N/A

<b>Impact on Admin Burdens Baseline</b> (2005 Prices)		(Increase - Decrease)
Increase of £ 0	Decrease of £ 0	<b>Net Impact £ 0</b>

**Key:** **Annual costs and benefits: Constant Prices** **(Net) Present Value**

## Summary: Analysis & Evidence

Policy Option: 4	Description: Local authorities classified as urban provide a fully accessible taxi fleet.
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COSTS	ANNUAL COSTS		Description and scale of <b>key monetised costs</b> by ‘main affected groups’
	One-off (Transition)	Yrs	
	£ 279,000,000	12	Approximately 15,000 saloon car taxis across GB would need to be converted to taxis meeting the interim standard at a cost of £18,000 per vehicle. The interim accessible vehicles would have poorer fuel consumption and greater emissions than saloon cars and would attract a high level of VED.
	Average Annual Cost (excluding one-off)		
	£ 14,500,000		
			Total Cost (PV)
Other <b>key non-monetised costs</b> by ‘main affected groups’			
None.			

BENEFITS	ANNUAL BENEFITS		Description and scale of <b>key monetised benefits</b> by ‘main affected groups’
	One-off	Yrs	
	£ 0		The accessible taxis will have longer service lives than saloon cars. Owners who convert will save on the cost of replacing a saloon car every four years (which they would do twice in the 12 year life span of an accessible taxi). There will also be a small (1 per cent) increase in turnover for drivers who convert.
	Average Annual Benefit (excluding one-off)		
	£ 11,550,000		
			Total Benefit (PV)
Other <b>key non-monetised benefits</b> by ‘main affected groups’			
This option would be expected to generate benefits around improved transport choice and enhanced quality of life for wheelchair users, although the extent of the value of these benefits is unknown.			

### Key Assumptions/Sensitivities/Risks

The policy would apply in local authorities classified as 100 per cent urban by the ONS, and/ or with more than 20 per cent of residents suffering from a limiting long-term illness. It is assumed that this policy could be enacted over an eight-year period between 2012 and 2020.



Price Base Year	Time Period Years 16	<b>Net Benefit Range (NPV)</b> <b>£ N/a</b>	<b>NET BENEFIT (NPV Best estimate)</b> <b>£ -197,196,000</b>
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What is the geographic coverage of the policy/option?		GB wide, cities only		
On what date will the policy be implemented?		2012 to 2020		
Which organisation(s) will enforce the policy?		Local authorities		
What is the total annual cost of enforcement for these organisations?		£ 0 (additional)		
Does enforcement comply with Hampton principles?		Yes		
Will implementation go beyond minimum EU requirements?		Yes		
What is the value of the proposed offsetting measure per year?		£ 0		
What is the value of changes in greenhouse gas emissions?		£ tbc		
Will the proposal have a significant impact on competition?		No		
Annual cost (£-£) per organisation (excluding one-off)	Micro <b>£ 982</b>	Small	Medium	Large
Are any of these organisations exempt?	No	No	N/A	N/A

<b>Impact on Admin Burdens Baseline</b> (2005 Prices)		(Increase - Decrease)
Increase of £ 0	Decrease of £ 0	<b>Net Impact £ 0</b>

**Key:** **Annual costs and benefits: Constant Prices** **(Net) Present Value**

## Evidence Base (for summary sheets)

### Background

This IA relates to the DfT's commitment to improve access to taxis for disabled people. Powers exist in the Disability Discrimination Act 1995 that would allow the Government to introduce regulations that set out a technical standard for 'accessible taxis'. If regulations were made, they would apply to all licensed taxis in Great Britain. In Northern Ireland, the Department of the Environment is responsible for taxi regulation as a transferred matter.

### Preparation of the IA

This initial IA has been prepared on the basis of early scoping work, which has involved informal consultation with a small number of stakeholders via workshops held by the DfT and a review of existing evidence.

### Options

Four options have been evaluated:

**Option 1:** Amending primary legislation to allow commencement and local authority enforcement of section 36 of the Disability Discrimination Act. This would place a duty on taxi and private hire drivers and owners to provide assistance to people in wheelchairs, to carry them in safety and in comfort, and to not make an additional charge for doing so. Failure to observe this duty would be a criminal offence, and local authorities would be able to prosecute offenders on behalf of wheelchair users. It is assumed that local authorities would enforce the section 36 duty.

**Option 2:** Adopting a GB-wide, fully accessible standard and implementing this through regulating the market for taxis in Great Britain. The accessibility standard adopted in this option complies with the DfT's **draft interim standard**, so is already met by purpose-built taxis and some conversions. It is assumed that this option would be implemented between 2012 and 2025.

**Option 3:** Adopting a GB-wide fully accessible standard and implementing this through regulating the market for taxis in Great Britain. The accessibility standard adopted in this option is that sought by the DfT's **draft enhanced standard**. No vehicles meet this standard currently, and a new vehicle/vehicles would have to be developed. It is assumed that this option would be implemented between 2012 and 2025.

**Option 4:** adopting an accessible standard and implementing this through regulating the market for taxis in Great Britain in urban areas and local authorities with a high proportion of the population who are mobility impaired. The accessibility standard adopted in this option is already met by purpose-built taxis and some conversions. It is assumed that this option would be implemented between 2012 and 2020.

All of the above 'do something' options are assessed against the 'do nothing' scenario, which includes consideration of the likely growth in accessible taxis without Government regulation, based on past trends.

## Sectors and groups affected

Any regulation would impact upon all taxis in Great Britain that are licensed to ply for hire (termed as 'taxis' but distinct from private hire vehicles). Research undertaken as a part of this project assessed that there are currently around 85,000 licensed taxis in the UK (around 74,000 in England and Wales). This figure excludes private hire vehicles.

The industry is characterised by a large number of independent owners, with very few large companies. For this reason, it would be impractical to exempt companies employing fewer than 20 people.

Undoubtedly, implementing any of the regulatory options would require supporting action by local authorities, particularly in the areas of:

- training taxi drivers in disability awareness;
- improving infrastructure at ranks (e.g. with high kerbs); and

- requiring private organisations operating transport interchanges and tourist attractions to provide access to accessible taxis and accessible infrastructure.

Option 1 would apply to all taxis in Great Britain and also to private hire vehicles. Enforcement of licensed taxis is undertaken by local authorities, apart from in London – where it is undertaken by the Public Carriage Office. The policies and practices surrounding licensing vary from one authority to the other. However, we have assumed that any additional enforcement action would be subsumed within existing regimes and so no additional cost would be incurred in this respect.

It is also assumed that there would be no additional administrative burdens falling on either enforcement authorities or vehicle owners, as there would be no significant difference in paperwork compared to current licensing requirements.

## Baseline

Please see Appendix A to this IA, which sets out what would be expected to happen in the ‘do nothing’ scenario.

## Option 1 – Analysis of impacts: commencement and enforcement by local authorities of section 36 of the DDA

### Costs

The costs of amending, commencing and enforcing the S36 duties are estimated to be as follows:

- amending primary legislation – negligible/no cost;
- local authority publicity for the measure – through communiqués with taxi owners and drivers, and private hire cars – assuming a cost of £1.00 per licensed driver = one-off cost of £1.00 x 219,000 drivers = £219,000;
- enforcement costs (no prosecution brought, but letter sent to offending driver – on basis of observation or public complaint) –

extent not known, but assume 1 action per 100 vehicles per year  
@ £5.00 per action =  $2,190 \times £5 = £10,950$ ; and

- enforcement costs (prosecution brought) – extent not known, but assume 1 action per 1,000 vehicles per year. There will be two elements of cost under this heading:
  1. Court costs: *The Cost of Criminal Justice* (Home Office, 1999/00) indicates an average cost of £550 (£680 in 2007/08 prices) to take proceedings in relation to a motoring offence to a magistrates court with a guilty plea, and £1,700 (£2,100 in 2007/08 prices) for a ‘not guilty’ plea. Offenders would go to proceedings in a magistrates court; it is assumed that 65 per cent of offenders will plead guilty (in line with the average for all cases, Crown Prosecution Service Annual Report, 2007/08). This implies an annual cost of £63,686 for cases with ‘not guilty’ pleas, and £30,977 for cases with guilty pleas (£94,663 in all);
  2. Costs to the prosecuting local authority – likely to be of a similar order of magnitude to the court costs (£95,000 pa).

## **Benefits**

There will be journey time reductions to a proportion of disabled people who would otherwise have to wait until the second passing taxi to pick them up, or make more than one booking with a private hire company. It is envisaged that commencement of section 36 will allow consistency across the country and enable disabled travelers to be more confident about using taxis, with a resultant increase in journeys undertaken. Greater awareness of the duties by drivers will add to this confidence. Establishing a monetary value of this benefit is difficult, and further research would have to take place to establish these costs.

## Option 2 – Analysis of impacts: interim standard

### Costs

#### Vehicle owners – assumptions:

- A proportion of purpose-built vehicles do not meet the draft interim accessibility standard. These Fairway and Metrocab vehicles were last produced (in any significant number) in 1997 and 2003 respectively. Therefore, based on an average 12-year service life, it can be assumed that all purpose-built taxis in use will meet the interim standard by 2015. As a result, it is assumed that there will be no additional costs associated with purpose-built taxis from the introduction of the interim standard, as all will have been updated to compliant models anyway.
- Have assumed that all converted minivans within the fleet are compliant (or would be by 2025 as a result of assumptions on service life). These vehicles only represent a small proportion of the fleet.
- The average life of a saloon car in service as a taxi is estimated to be four years (i.e. on average a driver will purchase the car at three years old, and sell it on (for very little) at seven years old). Therefore, for a compliance date of 2025 we have assumed there will be no loss of usable life costs, as the lead-in time would be sufficient to allow adjustments to be made.

### Capital cost

A typical purchase cost of a second-hand saloon car for use as a taxi is £6,000–8,000 (mid-point of £7,000), while a new purpose-built taxi/converted multi-purpose vehicle (MPV) would cost between £20,000 and 30,000 (mid-point of £25,000). On this basis, the additional one-off cost of conversion from a saloon car to an accessible taxi is £18,000. Consultation with manufacturers suggests that taxi drivers purchase a vehicle new and then keep it until life expired, and checks on the size of the second-hand market would appear to confirm a

small supply of second-hand vehicles on the open market. We have therefore assumed that all drivers converting from a saloon car would, in practice, need to buy a new accessible vehicle.

Making 100 per cent of the taxi fleet meet the interim accessible standard would require the purchase of 35,022 additional accessible taxis, at a net additional cost of £18,000. This results in a one-off transitional cost of £630m to owners.

### **Running costs**

Annual costs would increase as a result of potential changes in fuel consumption, VED, maintenance and insurance costs for an accessible taxi compared to a saloon car.

Fuel consumption figures published by the DVLA suggest a combined cycle fuel consumption of 35.2 mpg for a diesel LTI taxi (manual). Fuel consumption figures for converted MPVs are not generally available, but comparisons with mainstream production MPV<sup>5</sup> suggest the LTI figure is probably a good proxy for converted MPVs too. Fuel consumption for saloon cars is heavily dependent on whether they are diesel or petrol powered. However, assuming a 50/50 mix implies a combined cycle fuel consumption of around 43.1 mpg (representing an average of 1.8 litre diesel and 2.0 litre petrol Ford Mondeo). Assuming taxis cover 40,000 miles per year (Oxley) implies an additional cost of £937.20 per year (at £1.20 per litre of fuel, assuming drivers reclaim VAT of 18p/litre).<sup>5</sup>

LTI vehicles and MPVs are taxed at a rate of £210/year. A 2.0 litre petrol Mondeo is in the same tax band, although the 1.8 litre diesel version is £120. Consequently, an additional VED cost of £45.00 pa would fall on drivers converting from saloon cars, although the RIA treats this as a transfer between drivers and Treasury, and hence does not include it in the costs box.

Maintenance and insurance costs are assumed to be the same for saloon cars and accessible taxis.

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<sup>5</sup> The average fuel price in November 2008 was 108.82p per litre (diesel) and 94.86p (petrol). These figures will be updated in the post-consultation review.



The total estimated increase in running costs for those who convert from a saloon car to an accessible taxi would therefore be around £982.20 pa. The total cost to the industry is estimated at around £41m pa (based on the conversion of a total of 35,022 saloon cars) once full conversion has been achieved.

### **Local authorities**

Local authorities (and other licensing bodies) may incur an increase in the costs of providing training to drivers (in relation to disabled users), although this would be a complementary measure to the vehicle conversion and is assessed to be outside the scope of this IA. There will also be one-off infrastructure costs associated with the need to ensure that taxi ranks are accessible to disabled users. However, these costs will be dependent on the current level of accessibility and it has not been possible to estimate these at this time.

### **Benefits**

The largest benefit comprises savings that vehicle owners make through exchanging a saloon car which they would have to replace every four years for an accessible taxi which, potentially, would need to be replaced every 12 years. As such, a driver would make an upfront payment of £25,000 for an accessible vehicle, which would be offset by not having to purchase three saloon cars over the life of the accessible taxi at £7,000 each. The IA shows this as a saving, which of course it is. However, it is likely that many drivers in the trade would perceive the actual cost of conversion being the one-off cost of purchasing an accessible vehicle, and would heavily discount the deferred savings they may make in four and eight years' time.

The introduction of an interim accessibility standard would also generate benefits to disabled users able to use these vehicles as a result of improving their range of public transport options. Work by Oxley (2001) compares a number of taxi companies on the basis of the number of requests they receive for wheelchair accessible vehicles and concludes that such requests are dependent on local circumstances, but can vary from 0.2 per cent of all bookings to around 10 per cent of bookings in areas with taxi card schemes. We



have assumed that experience in most areas where accessible taxis are introduced will be a small increase in revenue for taxi operators. We have assumed a 1 per cent increase on an annual turnover of £25,000 – giving a revenue increase of £250 per converted taxi.

Although there are benefits in equality of opportunity from introducing an accessible taxi fleet, we have assumed that for many disabled people actual availability of wheelchair accessible transport is not problematic for pre-booked trips. Consequently, the specific benefit from this proposal will be increased availability of wheelchair accessible vehicles for trips hailed from the street/on ranks.

### **Environmental and social impacts**

There will be an increase in carbon emissions as a result of the higher fuel consumption of accessible vehicles over saloon cars. Emissions per vehicle would increase from 10.9 tonnes per year to 13.6 tonnes, an increase of 2.7 tonnes per year per vehicle – or 95,000 tonnes over the whole fleet.

The proposal would generate positive (but unquantifiable) social benefits in terms of the enhanced quality of life that would be experienced by disabled individuals as a result of the provision of increased choice with regard to public transport options.

### **Risks and uncertainty**

A key area of uncertainty relates to how the regulations would impact on the number of licensed taxis and the extent to which drivers would move into the private hire trade.

In addition, there are no known estimates of the monetary value disabled people would attach to their improved accessibility, or even the extent of current unmet demand for travel from this user group.

## Option 3 – Analysis of impacts, enhanced standard

### Costs

#### Operators

There are currently no fully accessible taxis on the market. Therefore, implementation of this option would be reliant on vehicle manufacturers developing and bringing a compliant model onto the market within the required timescale. However, the costs associated with such a model are currently unknown, but would reasonably be expected to exceed the cost of a vehicle that meets the interim standard. It is currently proposed that the regulation would be introduced in 2012, but operators will be given a specified timeframe during which compliance must be achieved – for the purposes of this analysis we have assumed 2025. However, discussions with manufacturers would be required to assess the timescale in which a compliant vehicle can be brought to market before a judgement on implementation date can be made.

As no vehicle currently meets this standard, implementation would require a complete replacement of the current fleet. As no licensing authority has yet mandated such an enhanced standard, all of this replacement cost would be attributed to the introduction of this regulation.

There would be a number of elements to this cost:

- Additional capital cost of compliant vehicle (i.e. the additional cost compared to the vehicle which would otherwise have been purchased). In this case we have assumed a mid point cost of £30,000, £23,000 greater than the cost of purchasing a saloon car as a taxi, or £5,000 above the cost of a converted or purpose-built vehicle.
- Loss of usable life of non-compliant vehicles. However, we have assumed in practice that all non-compliant vehicles will be life expired at 2025, when the regulation requires a 100 per cent accessible fleet.

## **Capital costs**

In line with the analysis presented for the interim accessible fleet, we have assumed 35,022 saloon cars will be replaced with taxis meeting the accessible standard (at an additional cost of £23,000 per vehicle) and 49,740 interim accessible taxis will be replaced (at an additional cost of £5,000 per vehicle). This gives an overall transitional cost of the measure of £1,054m.

## **Running costs**

In the absence of further information, we have assumed that vehicles meeting the enhanced standard will have similar running costs to those for vehicles meeting the interim standard. Therefore only those converting from saloon cars will be expected to face an increase in running costs – which will be as calculated in Option 2.

## **Local authorities**

Costs to local authorities will be in line with those in Option 2.

## **Benefits**

Capital cost savings are as laid out in Option 2, again with the upfront payment deferring vehicle replacement four and eight years after purchase of the accessible vehicle.

The taxi revenue benefits of this option are assessed to be 20 per cent higher than those for Option 2, because vehicles that meet the draft enhanced standard will be accessible to 20 per cent more wheelchair users. This proposal, however, will create greater equality of opportunity for disabled people, although this is a non-monetary benefit.

## **Environmental and social impacts**

In the absence of further information, we have assumed that fully accessible taxis will have similar carbon emissions to those meeting the interim standards.

Therefore environmental and social impacts will be in line with those set out in Option 2.

### **Risks and uncertainty**

In addition to the risks and uncertainties outlined for Option 2, there is also a major gap in relation to the costs associated with a fully accessible vehicle – as there are currently no suitable vehicles on the market that meet this standard, implementation would be reliant on such a vehicle being developed, possibly entailing significant design and development costs. This IA assumes that development costs for such a vehicle would be met by the vehicle manufacturers and converters, but the cost of this not being the case is substantial (£10m–20m).

## **Option 4 – Fleet conversion targeted on urban authorities and areas with high levels of limiting long-term illness**

### **Costs**

#### **Operators**

#### **Capital costs**

We have assumed 15,493 saloon cars will be replaced with vehicles meeting the interim accessible standard. Using the same assumptions as set out for Option 2, this gives an overall transitional cost of the measure of £279m.

#### **Running costs**

The assumptions about running costs are in line with those shown for Option 1. The running costs would, of course, apply to the smaller number of drivers who would need to convert. The UK-wide change in running cost would be £15m p.a. once full conversion has been achieved.

## **Local authorities**

Costs to local authorities will be in line with those in Option 1, although would only fall to the local authorities classified as 100 per cent urban by the Office of National Statistics (ONS), or which have more than 20 per cent of their residents suffering from Limiting Long-Term Illness (LLTI).

## **Benefits**

A targeted approach focused on urban areas would achieve benefits in the areas where most people live. It would also deliver an accessible fleet to most major transport interchanges and airports. In line with the assumptions on benefits in Option 2, we have assumed that all drivers who convert to an accessible vehicle see a revenue improvement of £250/year.

## **Environmental and social impacts**

Additional carbon emissions from the proposal will be 42,000 tonnes per year.

Social impacts will be in-line with those set out in Option 2, although would only apply in urban areas.

## **Risks and uncertainty**

The key risk for this approach is defining an effective methodology for choosing which authorities should be included within the first tranche of authorities for conversion to an accessible fleet. The methodology used here has been to include authorities classified as 100 per cent urban by ONS (145 authorities in England and Wales, plus 4 in Scotland) and/or those with more than 20 per cent of the population suffering LLTI. Nonetheless, this classification misses some large towns with rural hinterlands.

Other risks are assessed to be the same as for Option 2.

## Impact tests

### **Race and gender equality**

There are no race or gender equality impacts to this proposal.

### **Disability equality**

This proposal would significantly increase the number of taxis that can be used by wheelchair users. However, the experience of wheelchair users suggests that the proposal would only be effective if it was backed by action in other areas, specifically:

- training in disability awareness for taxi drivers, and duties on taxi drivers to stop for and assist wheelchair users;
- infrastructure improvements at taxi ranks to make it easier for wheelchair users to board taxis; and
- duties on the operators of transport interchanges and tourist attractions

### **Competition assessment**

The proposal will not place anti-competitive restrictions on the number or range of suppliers of licensed taxi services within an authority and will not reduce incentives to compete. In some areas there may be restrictions on the number of licences available, but this is as a result of local authority policy and not a result of the proposed regulation. Therefore the proposal is unlikely to raise any significant competition concerns.

### **Small Firms Impact Test**

The proposal will impose costs on all licensed taxi owners who do not already own a vehicle that meets the required standard. As noted, the licensed taxi trade is dominated by small firms, so an exemption would be impractical. However, the cost impact is related to the number of vehicles operated and so will be proportional to the size of the business, meaning that it will not impose an disproportionate burden on small firms.

## **Legal Aid**

There are no Legal Aid implications.

## **Sustainable development**

The increase in carbon emissions from the proposal conflicts with the principles of sustainable development.

## **Carbon assessment**

This regulation does not impact on any of the six activities that are identified by Defra as key sources of greenhouse gas emissions (i.e. energy, industrial processes, solvents and other product use, agriculture, land-use change/forestry, and waste). However, the increased fuel consumption of accessible vehicles will impact on carbon emissions originating from the taxi fleet.

## **Other environment**

Assuming no significant impact on local air quality, this proposal has no significant other environment impacts.

## **Health impact assessment**

At this stage it is considered that the proposals will have a small beneficial impact on health and wellbeing and health inequalities.

## **Human rights**

There are no human rights implications.

## **Rural proofing**

There is a possibility that this regulation could have a differential impact on rural areas, given the fact that the licensed taxi fleet is more likely to be made up of saloon cars in rural areas, and there is less rank work, so less incentive to license as a taxi over a private hire vehicle. Consequently, there is a greater chance of a reduction in the fleet caused by drivers moving into private hire.

## Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

**Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.**

Type of testing undertaken	<i>Results in Evidence Base?</i>	<i>Results annexed?</i>
Competition Assessment	No	No
Small Firms Impact Test	No	No
Legal Aid	No	No
Sustainable Development	No	No
Carbon Assessment	No	No
Other Environment	No	No
Health Impact Assessment	No	No
Race Equality	No	No
Disability Equality	No	No
Gender Equality	No	No
Human Rights	No	No
Rural Proofing	No	No



## Appendices

### Introduction

This appendix sets out the modelling work that was carried out by the consultants, WSP and Ecotec, to inform the scoping work for this initial Impact Assessment on improving access to taxis. As such, it comprises:

- a description of the definitions used in this work;
- the baseline to be adopted as the ‘do-nothing’ situation; and
- calculations of the numbers of new vehicles required to meet given accessibility standards.

### Definitions

The definition of what comprises an ‘accessible taxi’ is a complex one. Over the course of this paper, WSP will use five definitions:

- **Saloon car taxis** – these vehicles are conventional cars and are not accessible to wheelchair users. They meet the needs of many people with an ambulatory disability. As well as saloons, they may be hatchbacks or estate cars.
- **Wheelchair accessible taxis** – these can be purpose-built vehicles (e.g. LTI, Fairway, Metrocab) or converted MPVs (e.g. by Peugeot or Mercedes). These vehicles are all within the DfT’s classifications as purpose-built or converted taxis for the purposes of collecting taxi statistics.

In practice, however, some of these vehicles would not meet the DfT’s draft interim standard for a wheelchair accessible taxi. Fairway and Metrocab vehicles are examples of purpose-built vehicles that would not meet the DfT’s draft interim standard.

- Fully accessible taxis – this term refers to a vehicle that would meet the needs of both wheelchair users and people with an ambulatory disability. At present, there are no vehicles on the market that would meet all the requirements that are included in the DfT's draft enhanced specification.
- DfT's draft interim standard – this is a draft standard that the DfT proposes putting forward. It suggests technical specifications that would improve the accessibility of taxis for some wheelchair users and for those people with an ambulatory disability. The majority of vehicles currently available on the market would meet the proposed interim standard.
- DfT's draft enhanced standard – this is a draft standard that the DfT proposes putting forward as an aspirational technical specification. It would improve the accessibility of taxis for the vast majority of wheelchair users and for those people with an ambulatory disability. Vehicles would need to be designed or redesigned to meet some of the proposed specifications. At present there are no vehicles available to the taxi trade which would meet all of the proposed specifications.

## Baseline

### **Current vehicle stock in use**

There are currently approximately 84,762 licensed taxis in Great Britain. Of these vehicles, 40,285 are 'wheelchair accessible', in line with the definition above. The DVLA's registrations database suggests that there are still 8,442 Fairway and 3,565 Metrocab vehicles in use in the UK (including some in Northern Ireland, outwith this IA) – although these vehicles will fall out of use in the coming years. No vehicles currently comply with the 'enhanced' standard.

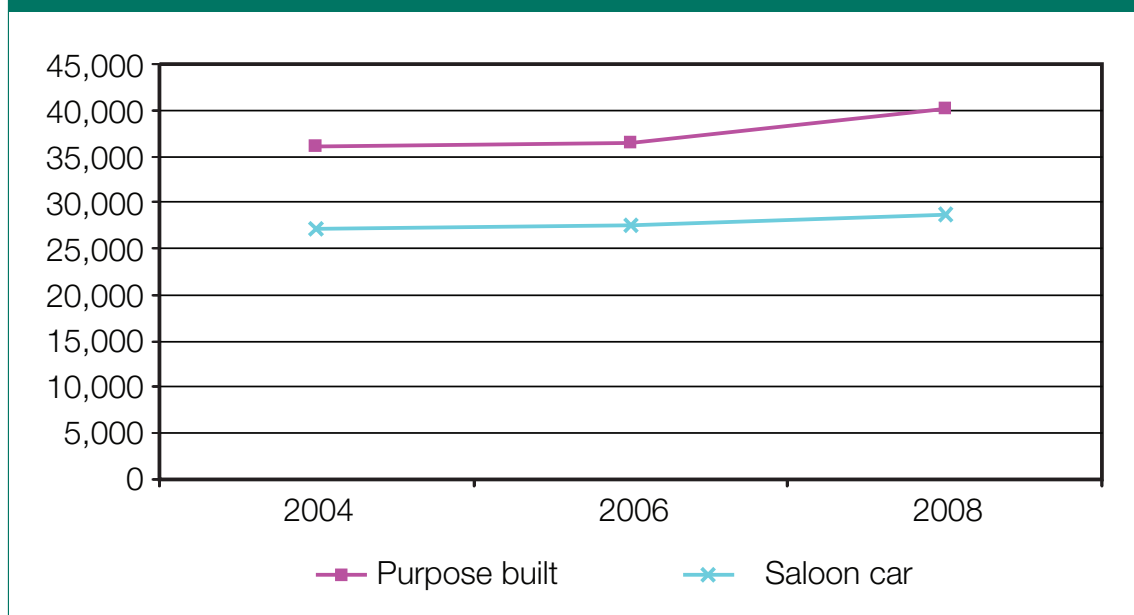
## Trends in use

### *Past trends*

Figure 1 shows the trend in the number and types of taxi in England, where the majority of the fleet is licensed (68,609 vehicles), between 2004 and the last collected statistics.<sup>1</sup> As can be seen:

- there is an increase in both vehicle types in use (therefore an increase in the total numbers of licensed taxis); and
- purpose-built taxis increase at a faster rate than saloon car taxis.

**Figure 1: The trend in the number and types of taxi in England**



In terms of the rates of change:

- the number of taxis of all types increases by 2.3 per cent per year; but
- the number of purpose-built taxis increases by 2.9 per cent per year.

<sup>1</sup> Public Transport Statistics Bulletins

It should be noted that many (but a falling number) of the purpose-built taxis shown in this trend will be Fairway and Metrocab vehicles, which do not meet the interim accessibility standard. Fairways were last produced in 1997 and Metrocabs (in any number) in 2003. If it is assumed that these vehicles have a 12 year service life,<sup>2</sup> then the last will fall out of use in 2015. Therefore it is assumed all purpose-built taxis in use beyond 2015 will meet the interim standard.

### *Trend drivers*

Discussions with the taxi trade indicate that, in the absence of regulation at a national level, there are two principal drivers of the adoption of taxis that meet the interim accessibility criteria:

- action by local authorities – either local authorities complete the implementation of existing accessible taxi policies, or authorities that don't currently have an accessible taxi policy introduce one because of political pressure or a perceived need to meet DDA conditions;
- demand – accessible taxis are adopted because there is a demand expressed through the market for accessible taxis from local wheelchair users, local taxi service procurers (e.g. the local NHS trust or education authority) or because there are other benefits to drivers of adopting wheelchair accessible vehicles (e.g. they can carry more passengers than a saloon car can) which outweigh the higher purchase and running costs of an accessible vehicle.

We have considered the effect of these two drivers below to construct low and high growth trends.

### *Future trends*

We have therefore considered two growth trends:

- a low growth trend, which would be seen if local authorities implemented their current accessible taxi policies, then additional

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<sup>2</sup> Assumption used for London Low Emissions Zone

local authorities committed to accessible taxi policies at the same rate as will be seen between 2007 and 2012; and

- a high growth trend, which continues the growth in the number of taxis that meet the interim accessible standard, seen between 2004 and 2008.

**Action by local authorities:** We have analysed the dataset collected by the DfT in 2007 and looked, specifically, at:

- authorities that are implementing a policy which will deliver to them a 'wheelchair accessible' taxi fleet by a set date; and
- authorities that require newly licensed taxis to be 'wheelchair accessible'.

We have assumed:

- any vehicles purchased to meet an accessibility standard will meet the interim standard, as Fairways and Metrocabs have been out of volume production for some time;
- authorities implement their accessible taxi policies by their current target dates; and
- saloon cars have a four-year life in service as taxis.

Consequently:

- assuming the authorities that are implementing a purpose-built taxi fleet policy achieve their goal by their current target data (the latest of which is 2012), then 2,102 additional purpose-built taxis will be required by 2012; and
- assuming saloon cars in the authorities that require newly licensed cars to be purpose-built have a service life of four years, an additional 918 taxis that meet the interim accessible standard will be introduced into the national fleet by 2012.

These two trends together imply an England/Wales growth trend for accessible taxis of 2.0 per cent per year to 2012. We have projected this trend forward to 2040 by assuming more local authorities will adopt accessible taxi policies. We have adopted this growth as the low growth forecast.

### *High growth forecast*

The trend between 2004 and the present suggests an increase in the number of accessible taxis of 2.9 per cent per year, but within the context of a general increase in the number of taxis of 2.3 per cent per year (and many of the new licences have been granted specifically to accessible taxis). This suggests an upper limit for increases of 2.9 per cent per year.

The high growth forecast assumes that there are factors that are increasing the adoption of wheelchair accessible taxis beyond those caused simply by local authority action. This might include procurement of wheelchair accessible taxis by NHS trusts or greater use of taxis for social transport schemes or special education needs transport by local authorities.

### **Mid-growth**

We have adopted a mid-growth forecast of 2.45 per cent per year. This is midway between the low and high growth forecasts.

### **All growth forecasts**

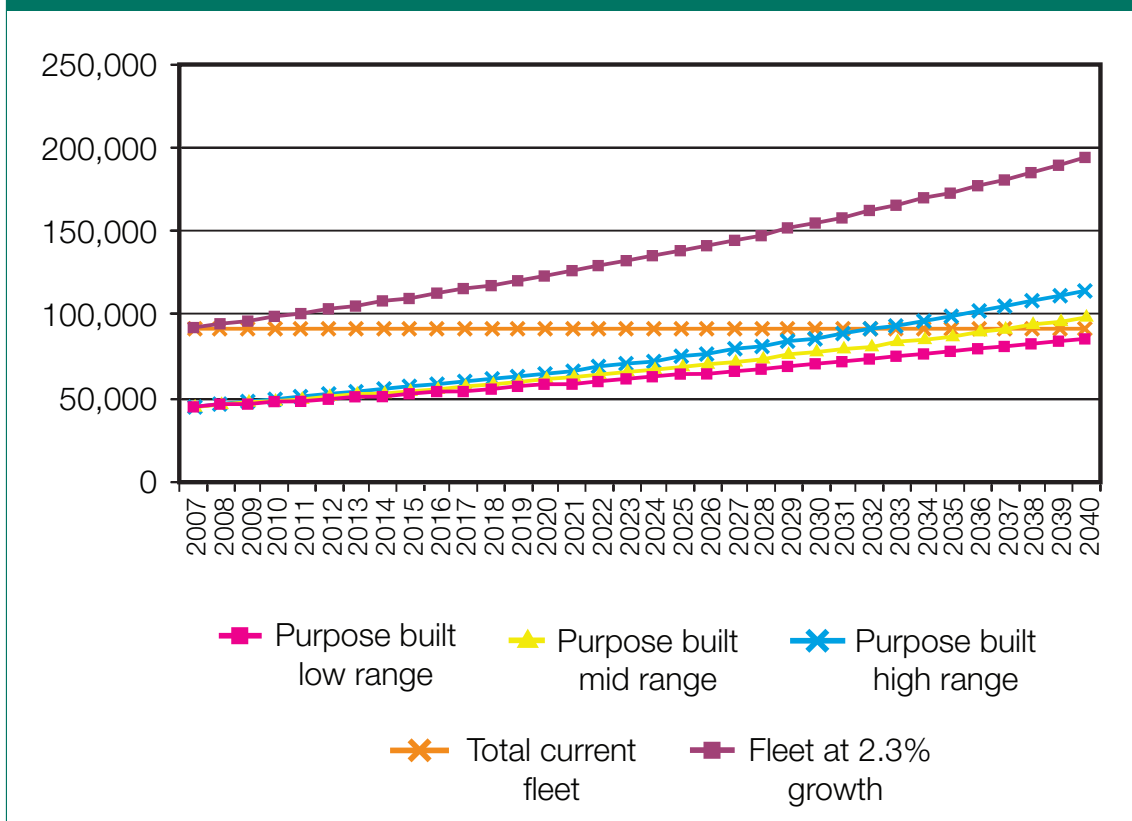
Figure 2 shows the growth forecasts, plus the total number of taxis and a total that grows at the 2003–08 average rate of 2.3 per cent per year.

The trends suggest:

- assuming no growth in the number of licences and adoption of accessible taxi policies by all local authorities:
  - the high growth rate will deliver an entirely accessible fleet in 2033;

- the mid-growth rate will deliver an entirely accessible fleet in 2037; and
- the low growth rate does not deliver an entirely accessible fleet before 2040.
- if licensing increases at the same rate as at present, then even the high growth rate for accessible vehicles will not deliver an accessible fleet by 2040. In the event of 2.3 per cent growth in licences per year and 2.9 per cent growth in accessible vehicles in the parc (i.e. the higher growth rate), then the proportion of purpose-built vehicles in the parc as a whole would change from 48 per cent in 2007 to 57 per cent in 2040.

**Figure 2: The growth forecasts, plus the total number of taxis**



# Annex C     Draft technical specification

## Introduction

This draft specification contains two levels of technical requirements aimed at improving access to taxis for disabled people.

The Initial Specification is broadly based upon existing vehicle designs and current technology and it should be possible for a significant number of existing vehicles to meet these requirements with little or no modification.

The Enhanced Specification draws its recommendations from a wide selection of research carried out both within the UK and internationally. It offers manufacturers a number of options to comply with the requirements and will provide considerable benefit to a broad range of disabled people who presently find it difficult or impossible to use the current design of taxis.

## Definitions

In this specification –

“boarding lift” means a lift fitted to a regulated taxi for the purpose of allowing wheelchair users to board and alight the vehicle;

“boarding ramp” means a ramp fitted to a regulated taxi for the purpose of allowing wheelchair users to board and alight the vehicle;

“contrast” means a contrast in the amount of light which is reflected by the surfaces of the parts of a regulated taxi or its equipment which is required by this specification to contrast;

“cushion” means that part of the seat on which the person using the seat sits, whether padded or not;



“deep” in relation to a step, means the distance from the outer edge of the nosing of the step tread to the rear of the step tread;

“entrance” means an entrance to a regulated taxi providing access to a priority seat or a wheelchair space;

“exit” means an exit from a regulated taxi but does not include an exit which is provided for use only in case of an emergency;

“external step” means the last step or platform from an entrance or an exit which leads directly from the vehicle to the ground;

“kg” means kilogram(s);

“kneeling system” means a system which enables the bodywork of a regulated taxi to be lowered relative to its normal height of travel;

“mm” means millimetre(s);

“normal height of travel” means the height specified by the vehicle’s manufacturer for normal vehicle travel;

“portable ramp” means a ramp which is carried in a regulated taxi for the purpose of allowing wheelchair users to board and alight from the vehicle;

“power grip” means a grip in which the fingers and thumb are able to wrap around a handle;

“priority seat” means a seat designated as such in accordance with Paragraph 3 of Section 2 of this specification;

“reference wheelchair” means an occupied wheelchair having the dimensions shown in Diagram A;

“seat” means a seat intended for use by passengers and, accordingly, does not include the driver’s seat;

“SRP” means Seating Reference Point, which is the point at which the seat cushion and seat back join, midway across the seat cushion width. Where the seat cushion and back components do not meet, the plane of the seat back and cushion shall be projected to an intersection.

“taxi” means a vehicle licensed under – (a) section 37 of the Town Police Clauses Act 1847, or (b) section 6 of the Metropolitan Public Carriage Act 1869, but does not include a taxi which is drawn by a horse or other animal;

“wheelchair user” means a disabled person using a wheelchair;

## Section 1. Wheelchair accessibility requirements

Initial Specification.		Enhanced Specification
<b>1. Wheelchair spaces</b>		
Number required	1 (minimum)	1 (minimum)
Orientation	Either forwards or rearwards	Either forwards or rearwards (within +/- 5 degrees of the direction of travel)
<b>2. Forward facing wheelchair spaces</b>		
Wheelchair space requirements	1130mm length (min) 690mm width (min) 1290mm height (min)	1300mm length (min) 750mm width (min) 1500mm height (min)
Gradient	The slope of the floor between any two points within the wheelchair space shall not exceed 1:1 degrees in the longitudinal plane and 5 degrees in the transverse plane	The slope of the floor between any two points within the wheelchair space shall not exceed 5 degrees in the longitudinal plane and 3 degrees in the transverse plane

Acceptable intrusions into the wheelchair space	One or more tipping, folding or easily removed seats. Padded head and back restraint. Handrails or handholds provided that they do not extend into the wheelchair space by more than 90mm. Wheelchair restraint system and wheelchair user restraint system and appropriate anchorages and fittings	One or more tipping, folding or easily removed seats. Padded head and back restraint. Handrails or handholds provided that they do not extend into the wheelchair space by more than 90mm. Wheelchair restraint system and wheelchair user restraint system and appropriate anchorages and fittings
Wheelchair user safety provisions	Every wheelchair space shall be fitted with a wheelchair tie-down system and a wheelchair user restraint system	Every wheelchair space shall be fitted with a wheelchair tie-down system and a wheelchair user restraint system which meets the technical requirements of ECWVTA, Annex XI – Appendix 3; or NSSTA, Section 2, Part A or B; or IVA, item 19; or bIVA, section 2, Part A or B
<b>3. Rearward facing wheelchair spaces</b>		
Wheelchair space requirements	1070mm length (min) 690mm width (min) 1290mm height (min)	1300mm length 750mm width 1500mm height
Gradient	The slope of the floor between any two points within the wheelchair space shall not exceed 11 degrees in the longitudinal plane and 5 degrees in the transverse plane	The slope of the floor between any two points within the wheelchair space shall not exceed 5 degrees in the longitudinal plane and 3 degrees in the transverse plane

Acceptable intrusions into the wheelchair space	One or more tipping, folding or easily removed seats. Padded head and back restraint. Handrails or handholds provided that they do not extend into the wheelchair space by more than 90mm. Wheelchair restraint system and wheelchair user restraint system and appropriate anchorages and fittings.	One or more tipping, folding or easily removed seats. Padded head and back restraint. Handrails or handholds provided that they do not extend into the wheelchair space by more than 90mm. Wheelchair restraint system and wheelchair user restraint system and appropriate anchorages and fittings.
Wheelchair user safety provisions	Every wheelchair space shall be fitted with a wheelchair tiedown system and a wheelchair user restraint system	Every wheelchair space shall be fitted with a wheelchair tie-down system and a wheelchair user restraint system which meets the technical requirements of NSSTA, Section 2, Part A or B; or IVA, item 19; or bIVA, section 2, Part A or B
<b>4. Boarding lifts and ramps</b>		
Safe working load	300 kg (min)	300 kg (min)
Means of preventing the vehicle being driven away	Not allow the vehicle to be driven away whilst device is deployed	Not allow the vehicle to be driven away whilst device is deployed

Dimensions (length applies to that outside of the overall vehicle body footprint at the ramp entry level)	<p><b>Single piece ramp</b> Width 700mm (min) Length 1600mm (max)</p> <p><b>Lift</b> Width 700mm (min) Length 1200mm (min)</p>	<p><b>Single piece ramp</b> Width 800mm (min) Length 1200mm (max)</p> <p><b>Lift</b> Width 750mm (min) Length 1200mm (min)</p>
Ramp gradients (can be achieved using a kneeling system)	<p><b>Side entry</b> Kerb (125mm): 11 degs (max) Ground: 17 degs(max)</p> <p><b>Rear entry</b> Ground: 11 degs(max)</p>	<p><b>Side entry</b> Kerb (125mm): 8 degs (max) Ground: 17 degs (max)</p> <p><b>Rear entry</b> Ground: 8 degs (max)</p> <p>Additionally comply with requirements of the DfT/SMMT voluntary ramp specification available at the following link: <a href="http://www.dft.gov.uk/transportforyou/access/buses/pubs/research/wheelchairboardingramps">http://www.dft.gov.uk/transportforyou/access/buses/pubs/research/wheelchairboardingramps</a></p>

Slip resistant surfaces	All surfaces over which a wheelchair user may travel shall have a slip resistant finish applied	All surfaces over which a wheelchair user may travel shall have a slip resistant finish applied
Handrails	<p><b>Ramps</b> Not required</p> <p><b>Lifts</b> Where the platform travel exceeds a height of 500mm from the ground then a handrail must be provided.</p>	<p><b>Ramps</b> Not required</p> <p><b>Lifts</b> Where the platform travel exceeds a height of 500mm from the ground then a handrail must be provided.</p>
Guards	<p><b>Ramp</b> None</p> <p><b>Lift</b> Side upstands 25mm high and automatic roll-off devices fitted at least 100mm high at each end of the platform</p>	<p><b>Ramp</b> Side upstands 25mm high when deployed</p> <p><b>Lift</b> Side upstands 25mm high and automatic roll-off devices fitted at least 100mm high at each end of the platform</p>
Colour contrasting edge markings	A band contrasting with the remainder of the boarding ramp or lift surface, 45mm to 55mm in width around and abutting the edge of the ramp or lift surface	A band contrasting with the remainder of the boarding ramp or lift surface, 45mm to 55mm in width around and abutting the edge of the ramp or lift surface

Control and fail-safe mechanisms for power operated equipment	Power operated equipment shall only be capable of operation from a control adjacent to the ramp or lift	Power operated equipment shall only be capable of operation from a control adjacent to the ramp or lift
Load sensors and re-cycling mechanisms for power operated equipment	A device to stop the movement of the boarding ramp or lift if that motion is likely to cause injury	A device to stop the movement of the boarding ramp or lift if that motion is likely to cause injury
Manual override provisions for power operated equipment	A provision to repeatedly operate the equipment in the event of power failure shall be provided	A provision to repeatedly operate the equipment in the event of power failure shall be provided



Manual/portable ramp storage provisions	Such ramps must have a designated stowage location which can store the equipment such that it does not present a risk of injury.	Such ramps must have a designated stowage location which can store the equipment such that it does not present a risk of injury.
<b>5. Entrances and exits</b>		
Number and position	A minimum of 1 located on the nearside or the rear of the vehicle	A minimum of 1 located on the nearside or the rear of the vehicle
Minimum doorway width	740mm	800mm
Minimum doorway height	1230mm	1400mm
<b>6. Interior manoeuvring space</b>		
From a wheelchair entrance to a wheelchair space	No requirement	It shall be possible to move into the space with an occupied DDA reference wheelchair with the wheelchair entering the vehicle in a forward direction.

From a wheelchair space to a wheelchair exit	No requirement	It shall be possible to move from the space with an occupied DDA reference wheelchair to a wheelchair exit.
Floor gradient	No requirement	The surface over which the wheels of a reference wheelchair pass to access and egress the wheelchair space shall not exceed 8 degrees in any direction
<b>7. Signs and markings</b>		
Interior	Visible advice to wheelchair user and taxi driver on positioning of wheelchair and use of wheelchair tie-down and occupant restraint systems	Visible advice to wheelchair user and taxi driver on positioning of wheelchair and use of wheelchair tie-down and occupant restraint systems
Exterior	Clear indication that the vehicle is wheelchair accessible	Shall be fitted with a sign conforming with Diagram B, Section 4, coloured white on a blue background and clearly visible in relation to the surrounding area, measuring 100mm square and situated adjacent to any entrance for a wheelchair user

Section 2. Ambulatory accessibility requirements

Initial Specification.		Enhanced Specification
<b>1. Entrances and Exits</b>		
Number and location	A minimum of 1 located on the nearside or the rear of the vehicle	A minimum of 1 located on the nearside or the rear of the vehicle
Aperture dimensions	Where the priority seat meets the requirements of 3(a) it shall be of adequate dimensions to allow the passage through the aperture of the occupied priority seat.	<p>Where the priority seat meets the requirements of 3(a) it shall be of adequate dimensions to allow the passage through the aperture of the occupied priority seat and shall permit the following clear spaces to be maintained at all times:-</p> <p>(a) a single plane from the SRP to the leading edge of the priority seat cushion extending 980mm vertically and;</p> <p>(b) a centrally located space immediately in front of the leading edge of the seat cushion and measuring 250mm wide by 300mm deep, and extending from a height of 350mm below SRP to 200mm above SRP.</p>

	<p>Where the priority seat meets the requirements of 3(b)(i) the door aperture shall allow the passenger to easily access the seat from outside of the vehicle.</p> <p>Where the priority seat meets the requirements of 3(b)(ii) the doorway shall be 650mm wide by 1230mm high.</p>	<p>Where the priority seat meets the requirements of 3(b)(i) the entrance:</p> <p>(a) shall have its upper edge at least 980mm above SRP and its lower edge at least 300mm below SRP and;</p> <p>(b) The horizontal distance from the SRP to the side edge of the door aperture in front of the leading edge of the seat cushion shall be no less than 900mm and;</p> <p>(c) No vehicle structure located above the SRP to a height of 980mm shall project horizontally by more than 200mm beyond the SRP into the aperture, towards the leading edge of the seat cushion.</p> <p>Where the priority seat meets the requirements of 3(b)(ii) the door aperture shall measure at least 650mm wide by 1600mm high. Obstructions are permitted into areas located in each of the top corners measuring 100mm wide by 200mm high</p>
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Manual door design	Hinged and sliding doors acceptable	<p>(a) Hinged or sliding doors are acceptable. Those requiring an opening/closing effort in excess of 70N or those with a latching/unlatching effort in excess of 15N must be power operated.</p> <p>(b) The maximum reach distance from the priority seat to the nearest door handle should be 450mm</p> <p>(c) Door handles that enable the 'power grip' should be used.</p> <p>(d) Internal &amp; external handles should be at least 65mm long</p>
Powered door requirements	<p>(a) Shall be capable of operation by a passenger when the vehicle is stationary.</p> <p>(b) A device to stop the movement if that motion is likely to cause injury to a passenger or pedestrian</p> <p>(c) A provision to operate the equipment in the event of power failure</p>	<p>(a) Shall be capable of operation by a passenger when the vehicle is stationary.</p> <p>(b) A device to stop the movement if that motion is likely to cause injury to a passenger or pedestrian</p> <p>(c) A provision to operate the equipment in the event of power failure</p>

<b>2. Interior space</b>		
Floor	Any surface over which a passenger is required to walk shall have a slip resistant finish.	For vehicles utilising a priority seat complying with 3(b)(ii), any surface over which a passenger is required to walk from the entrance to the priority seat shall have a slip resistant finish and not slope more than 3 degrees in any direction.
<b>3. Priority seats</b>		
Provision	<p>At least 1 priority seat must be provided which may be either:</p> <p>a) A multi-axial moving seat which can be easily used by a passenger boarding from the kerb or ground or;</p> <p>b) a fixed seat design;</p> <p>i) providing the cushion is no more than 200mm measured inwards from the entrance or;</p> <p>ii) providing the cushion is as near as practicable to the entrance and the internal floor to roof height exceeds 1500mm</p>	<p>At least 1 priority seat must be provided which may be either:</p> <p>a) A multi-axial moving seat which can be easily used by a passenger boarding from the kerb or ground or;</p> <p>b) a fixed seat design;</p> <p>i) providing the cushion is no more than 200mm measured inwards from the entrance or;</p> <p>ii) providing the cushion is as near as practicable to the entrance and the internal floor to roof height exceeds 1750mm</p>

Orientation	Forward or rearward facing	Forward or rearward facing (within +/- 5 degrees of the direction of travel)
Spacing	<p>For all-forward facing priority seat configurations, the clear space in front of the SRP shall be 650mm min.</p> <p>For facing seat configurations the seat back separation shall be 1300mm min and the distance between the leading edges of each seat cushion shall be 400mm min.</p>	<p>For all-forward facing priority seat configurations, the clear space in front of the SRP shall be 650mm min.</p> <p>For facing seat configurations the seat back separation shall be 1300mm min and the distance between the leading edges of each seat cushion shall be 425mm min.</p> <p>Each priority seating position shall have in front of it a clear floor space of 300mm deep x 250mm wide x 80mm high, except facing seat configurations whereby the space shared by opposing seats must be 400 wide.</p> <p>Additionally, a priority seat complying with 3(a) shall have in front of it when deployed for use a clear zone measuring 400mm by 400mm and projecting from the ground to the top of the associated door aperture.</p>

Dimensions	<p>All priority seats shall have a minimum width of 380mm and a depth of 340mm – 510mm.</p> <p>The SRP of a fixed seat complying with the requirements of 3(b)(i) or (ii), or of a multi-axial moving seat when positioned for travel, shall have a height above the vehicle floor of 300-450mm.</p> <p>Additionally, the SRP of a fixed seat complying with the requirements of 3(b)(i), or a multi-axial moving seat complying with 3(a) when deployed for boarding and alighting, shall have a height above the ground of 420mm – 870mm.</p>	<p>All priority seats shall have a minimum width of 440mm and a depth of 400mm – 500mm.</p> <p>The SRP of a fixed seat complying with the requirements of 3(b)(i) or (ii), or of a multi-axial moving seat when positioned for travel, shall have a height above the vehicle floor of 300–450mm.</p> <p>Additionally, the SRP of a fixed seat complying with the requirements of 3(b)(i) or, a multi-axial moving seat complying with 3(a) when deployed for boarding and alighting, shall have a height above the ground of 400mm – 650mm.</p>
<b>4. Steps – Applies only to vehicles with a floor or sill height exceeding 320mm (May be achieved with kneeling)</b>		
Dimensions	<p>1st step from the ground shall not exceed 250mm.</p> <p>Subsequent steps 100mm – 200mm</p> <p>Width : 400mm min</p> <p>Depth : 190mm min</p>	<p>1st step from the ground shall not exceed 250mm.</p> <p>Subsequent steps 100mm–200mm</p> <p>Width : 400mm min</p> <p>Depth : 230mm min</p>



Design features	Steps shall be designed to be, slip resistant, minimise tripping risk and have a contrasting band along the front edge 45-55mm	Steps shall be designed to be, slip resistant, have a contrasting band along the front edge 45-55mm and be of such a design as to prevent them being a trip hazard
Max number of intermediate steps from ground to vehicle floor	2	1
Step operation for non-fixed steps	No requirement	Shall deploy automatically with door opening
Requirements for power operated steps	<p>A device to stop the movement if that motion is likely to cause injury</p> <p>A provision to repeatedly operate the equipment in the event of power failure shall be provided</p>	<p>A device to stop the movement if that motion is likely to cause injury</p> <p>A provision to repeatedly operate the equipment in the event of power failure shall be provided</p>

5. Handrails and handholds		
Position	Handrails/handholds must be provided for disabled passengers entering/exiting the vehicle and when manoeuvring inside the vehicle to a seat.	Handrails/handholds must be provided for disabled passengers entering/exiting the vehicle and when manoeuvring inside the vehicle to a seat.
Dimensions	20–35mm diameter or oval with the maximum section 30-35mm and the minimum section 20mm.	20–35mm diameter or oval with the maximum section 30-35mm and the minimum section 20mm.
Design	Handrails and handholds shall be slip resistant, capable of being easily and firmly gripped and visually contrast with surroundings.	Handrails and handholds shall be slip resistant, capable of being easily and firmly gripped and visually contrast with surroundings.

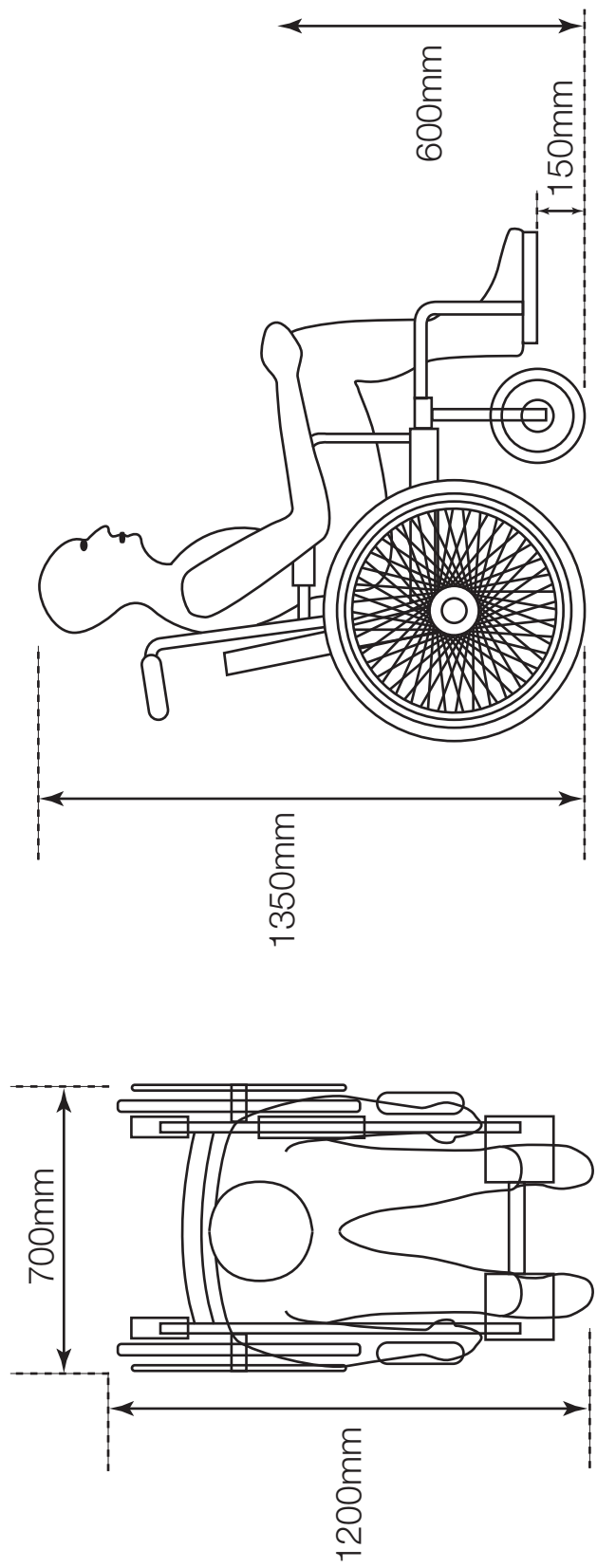
## Section 3. General accessibility requirements

Initial Specification.		Enhanced Specification
<b>1. Communication devices and displays – if required by local conditions they must meet the following requirements</b>		
Requirements and dimensions for 'Taxi' sign	A 'Taxi' sign must be fitted to the front of the vehicle which is clearly visible both by day and night to indicate that the taxi is available for hire.	A 'Taxi' sign must be fitted to the front of the vehicle which is clearly visible both by day and night to indicate that the taxi is available for hire.
Provision of induction loops	An induction loop shall be provided within the passenger carrying area.	An induction loop shall be provided within the passenger carrying area.
Fare meters	Large clear contrasting text visible by both day and by night.	Large clear contrasting text visible by both day and by night.  Talking meters able to speak the final fare.

<b>2. Kneeling systems</b>		
Design features	Where a kneeling system is fitted, a switch shall be required to be used to enable operation, any control must be under the direct control of the driver, the lowering process shall be capable of being stopped and reversed and shall prevent the vehicle being driven at a speed exceeding 5km/h when the vehicle is lowered.	Where a kneeling system is fitted, a switch shall be required to be used to enable operation, any control must be under the direct control of the driver, the lowering process shall be capable of being stopped and reversed and shall prevent the vehicle being driven at a speed exceeding 5km/h when the vehicle is lowered.
<b>3. Lighting</b>		
Design features	Lighting shall be fitted to illuminate the interior and exterior of the vehicle sufficient to allow both wheelchair users and other passengers to board and alight the vehicle in safety.  Any lighting fitted in accordance with this requirement shall have a means of preventing its operation when the vehicle is in motion if its use is likely to affect adversely the driver's vision.	Lighting shall be fitted to illuminate the interior and exterior of the vehicle sufficient to allow both wheelchair users and other passengers to board and alight the vehicle in safety.  Any lighting fitted in accordance with this requirement shall have a means of preventing its operation when the vehicle is in motion if its use is likely to affect adversely the driver's vision.

Section 4. Diagrams

Diagram A: Wheelchair dimensions





## Annex D Code of Practice on Consultation

The Government has adopted a Code of Practice on consultations. The Code sets out the approach Government will take to running a formal, written public consultation exercise. While most UK departments and agencies have adopted the Code, it does not have legal force, and cannot prevail over statutory or other mandatory external requirements (e.g. under European Community Law). The Code contains seven criteria. They should be reproduced in all consultation documents. Deviation from the Code will at times be unavoidable, but the Government aims to explain the reasons for deviations and what measures will be used to make the exercise as effective as possible in the circumstances. The seven consultation criteria are:

1. **When to consult:** Formal consultation should take place at a stage when there is scope to influence the policy outcome.
2. **Duration of consultation exercises:** Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.
3. **Clarity of scope and impact:** Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.
4. **Accessibility of consultation exercises:** Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.

5. **The burden of consultation:** Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.
6. **Responsiveness of consultation exercises:** Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.
7. **Capacity to consult:** Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

If you consider that this consultation does not comply with the criteria or have comments about the **consultation process** please contact:

Lec Napal  
Department for Transport  
Zone 1/33 Great Minster House  
76 Marsham Street  
London, SW1P 4DR  
email: [consultation@dft.gsi.gov.uk](mailto:consultation@dft.gsi.gov.uk)

A full version of the Code of Practice is available on the Better Regulation Executive website at: [www.berr.gov.uk/files/file47158.pdf](http://www.berr.gov.uk/files/file47158.pdf)









**Agenda Item No. 9.3**  
**Appendix 1**

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