

Improving access to taxis

Consultation analysis report

August 2009

Executive Summary

In February 2009, the Department for Transport (DfT) issued a consultation document and impact assessment entitled *Consultation on improving access to taxis*, requesting stakeholder responses by 24 April 2009. The consultation document explored how to improve access to taxis for disabled people, to ensure that they, in turn, might be able to have greater access and equality of opportunity.

The consultation document sought to stimulate a constructive discussion of the issues that would enable the Government to develop and implement a strategy that results in real improvements. Nineteen questions were specified. The DfT was particularly keen to receive responses from: disabled groups or perspectives; taxi and private hire vehicle drivers or operators; vehicle manufacturers; local authorities and/or licensing authorities; and those responsible for the management and operation of a major transport interchange.

A total of 167 responses to the consultation were received: licensing authorities accounted for nearly half of respondents, disabled representatives for more than one-quarter and taxi operators for one-fifth.

This report provides an analysis of responses to each of 19 questions posed in the consultation document. Key themes are identified and key issues summarised, both quantitatively and qualitatively. Key findings include the following:

- (a) Three-quarters of respondents express concern about one or more elements of the data analysis that underpins the consultation (Question 1);
- (b) Of those who express a view, nearly nine-tenths of consultees are against 'doing nothing', identifying a wide range of impacts, costs and benefits associated with this option (Question 2);
- (c) Just one-fifth of consultees who expressed a view on the 'do nothing' approach are able to provide further or more accurate data on the approach's costs and benefits (Question 3);
- (d) There are a wide range of views on the nature and style of any guidance, its intended audience, format, topics for inclusion and means of promoting take-up (Question 4);
- (e) More than one-third of consultees express explicit support for the interim technical specification, but support for the enhanced specification is very mixed (Questions 5 & 16);
- (f) Many respondents provide detailed comments on wheelchair accessibility requirements (Questions 5 & 16);
- (g) Four-fifths of consultees support, fully or cautiously, the idea of DfT-funded demonstration schemes (Question 6);
- (h) Consultees propose a number of ways to effectively influence action by local licensing authorities, drivers and manufacturers, and two-thirds believe that drivers will respond better to 'carrots' than 'sticks' (Question 7);
- (i) More than half of consultees support the proposal to amend and commence section 36 of the Disability Discrimination Act 1995, with an additional 35% expressing partial or caveated support (Question 8);
- (j) Consultees suggests a wide range of enforcement action, tools and positive incentives to improve driver behaviour and attitudes (Questions 9 & 10);

- (k) Nearly one-half of consultees believe that DfT and local licensing authorities should improve access to taxis by improving taxi services at transport interchanges (Question 11);
- (l) Nearly two-thirds of respondents believe that changes are needed to how transport-interchange owners deal with the provision of wheelchair-accessible taxis at their interchanges (Question 12);
- (m) Views are fairly evenly split on how to improve the consistency and quality of information provided to disabled people about taxis (Question 13);
- (n) Four-tenths of respondents were broadly positive about the idea of a proactive programme of DfT-led initiatives, but six-tenths were broadly negative (Question 14);
- (o) Very few consultees were able to provide data on the potential costs and benefits of a programme of DfT-led initiatives (Question 15);
- (p) Just over half of respondents identify positive impacts that they would expect from a regulatory approach, but seven-tenths identify negative impacts (Question 17);
- (q) Very few consultees were able to provide data on the potential costs and benefits of a regulatory approach (Question 18);
- (r) There are mixed views on the three options for enforcing the proposed technical specification (Question 19).

Contents

Page	
5	The consultation
10	Question 1
14	Question 2
18	Question 3
19	Question 4
23	Question 5
24	Question 6
29	Question 7
33	Question 8
36	Question 9
39	Question 10
42	Question 11
45	Question 12
49	Question 13
52	Question 14
56	Question 15
56	Question 16
58	Question 17
64	Question 18
66	Question 19
	Annex

0. The consultation

Overview of the consultation

0.1 In February 2009, the Department for Transport (DfT) issued a consultation document and impact assessment entitled *Consultation on improving access to taxis*, requesting stakeholder responses by 24 April 2009. The consultation document stressed the vital role that taxis play in the transport system, helping many people travel to jobs, services, education and social networks. The document explored how to improve access to taxis for disabled people, to ensure that they, in turn, might be able to have greater access and equality of opportunity.

0.2 The document acknowledged that the issues of taxi accessibility has been under consideration for several years and that it has proven difficult so far to deliver the needed changes while ensuring that the taxi industry remains viable. The consultation document sought to stimulate a constructive discussion of the issues that would enable the Government to develop and implement a strategy that results in real improvements.

0.3 Consultation documents were sent to more than 1500 entities and individuals, inviting them to participate in the consultation and explaining how they could do so. The consultation document was made available on the DfT website (www.dft.gov.uk). DfT also arranged three consultation seminars during the consultation period, to provide opportunities for those affected by the consultation to voice their opinions directly to the Department. The DfT was particularly keen to receive responses from:

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

Response profile

0.4 A total of 167 responses to the consultation were received, the large majority from organisations and companies rather than private individuals. Table 1 provides a breakdown of responses received, classified according to eight stakeholder groups identified by the DfT.

Table 1. Breakdown of responses to consultation document by stakeholder category

	<i>Total number of responses</i>	<i>% of total</i>
Disabled groups or perspectives ¹	44	26.3
Licensing Authorities or representative organisations ²	80	47.9
Vehicle manufacturers	3	1.8
Operators, drivers or operator organisations	34	20.4
Research organisation	1	0.6
Standards organisations	2	1.2
Training organisations	1	0.6

Private individuals not identified elsewhere	2	1.2
--	---	-----

¹ given the shorthand 'disabled representatives' during the analysis

² Total includes one company that works as an advisor to local/licensing authorities

0.5 For each question, we give a brief quantitative analysis of key elements of the response base.

0.6 First, we indicate the number of responses, and the percentage of consultees who responded to the particular question. This may give an indication of the 'interest factor' of each question or of the ease of answer. Overall respondent levels for the 19 questions are summarised in Table 2, expressed as a percentage of the total consultee case (167).

Table 2. Percentage of total consultee group responding to each Question

Question	% of consultees who respond	Question	% of consultees who respond
1	58.1	11	55.7
2	56.9	12	56.3
3	10.8	13	56.3
4	55.1	14	40.1
5	59.9	15	4.8
6	59.3	16	52.7
7	57.5	17	62.9
8	64.1	18	8.4
9	61	19	54.5
10	62.9	mean	49.3

0.7 Second, we provide a breakdown of respondents to the question by stakeholder group in a Table that accompanies the analysis of each question.

(a) We give absolute numbers of respondents for each group.

(b) We then specify the percentage that the stakeholder group provides to all responses to the question. This is shown in the column headed "percentage of total responses to this question". These results are summarised for all questions in Table 3. This reveals that, for an average question:

- licensing authorities account for 62.7% of respondents;
- disabled representatives 19.6%;
- operators 13.4%;
- vehicle manufacturers 4.6%; and
- other stakeholder 1.2%.

(c) We then specify the percentage of the stakeholder group that responded to the question. This is shown in the column headed "percentage respondents of total stakeholder group". These results are summarised for all questions in Table 4.

This reveals that, for an average question:

- 34.3% of disabled representatives respond; as do
- 64.3% of licensing authorities;
- 91.2% of vehicle manufacturers; and
- 32.4% of operators.

(d) These figures may give an indication of the extent to which particular stakeholder groups were interested in the question.

Table 3. A comparison of the share of responses of each stakeholder group to each question (%)¹

Stakeholder group		Disabled groups or perspectives	Licensing Authorities or representatives	Vehicle manufacturers	Operators, drivers or operator organisations	Others ²
Question						
1		18.6	61.9	3.1	16.5	1.0
2		19.0	66.3	3.1	11.6	
3		16.7	55.6	5.5	4.2	
4		18.5	66.3	3.3	9.8	2.2
5		20.0	62.0	3.0	13.0	2.0
6		20.4	62.2	3.1	12.2	2.0
7		18.7	65.6	3.1	11.5	1.0
8		19.6	60.7	2.8	48.5	1.8
9		21.6	60.8	2.9	12.7	1.8
10		21.0	61.8	2.8	12.4	2.0
11		18.3	62.4	3.2	15.0	1.1
12		21.3	62.8	3.2	13.8	2.2
13		22.0	61.5	3.3	11.0	2.2
14		19.4	67.2	3.0	10.4	
15		25.0	62.5	12.5		
16		20.5	64.7	2.3	11.4	1.1
17		19.0	64.8	2.9	13.3	0.9
18		14.3	64.3	21.4	7.1	
19		17.6	57.1	3.3	20.9	1.1
mean		19.6	62.7	4.6	13.4	1.2

¹ A blank box indicates no replies from the stakeholder group for the specific question.

² Others lumps the share of research organisations, standards organisations, training organisations and private individuals.

Table 4. The proportion of each stakeholder group that responded to each question (%)¹

Stakeholder group ²		Disabled groups or perspectives	Licensing Authorities or representatives	Vehicle manufacturers	Operators, drivers or operator organisations
Question					
1		40.9	75	100	47.1
2		41	78	100	32.4
3		6.8	12.5	33.3	11.8
4		38.6	75	100	26.5
5		45.5	76.5	100	38.2
6		45.4	76.2	100	35.3
7		40.9	77.8	100	36.7
8		47.7	81.2	100	48.5
9		50	77.5	100	38.2
10		50	81.2	100	38.2
11		38.6	72.5	100	44.1
12		45.5	73.7	100	38.2
13		45.5	70	100	29.4
14		29.5	56	100	20.6
15		4.5	6.2	33.3	
16		40.9	71.2	66.6	29.4
17		45.5	85	100	41.2
18		4.5	11.2	100	3.0
19		36.4	65	100	57.6
mean		34.3	64.3	91.2	32.4

¹ A blank box indicates that there were no replies from the stakeholder group for the specific question.

² Research organisations, standards organisations, training organisations and private individuals are not shown in this table because these stakeholder groups were too small to make analysis meaningful.

0.8 We also provide a qualitative assessment of the key themes that emerge from the responses, drawing out strands from the numerous responses and presenting them in a clear and coherent manner.

0.9 Questions 5, 16 and 19 relate to the proposed technical specifications and associated enforcement. The technical aspects of consultee responses to these Questions are considered in detail in the Annex. In the main body of the report we summarise only non-technical aspects of the responses.

0.10 In the following analysis of responses to the questions and issues raised in the consultation document, the considerations of six entities – considered key stakeholders by the Department for Transport (DfT) – are reported in relatively greater detail. Where the key stakeholders share the views of others, this is indicated in the analysis. Their views are also given in greater detail at the end of the analysis on each question. These entities are as follows:

<i>Key stakeholder</i>	<i>Acronym</i>	<i>Stakeholder group</i>
Disabled Persons Transport Advisory Committee	DPTAC	Disabled groups or perspective
National Association of Licensing and Enforcement Officers	NALEO	Licensing Authorities or representative organisations
Allied Vehicles Ltd	n/a	Vehicle manufacturers
LTI Vehicles	LTI	Vehicle manufacturers
National Private Hire Association	NPHA	Operators, drivers or operator organisations
National Taxi Association	NTA	Operators, drivers or operator organisations

Acronyms used

CD	Compact Disc
DDA	Disability Discrimination Act 1995
DfT	Department for Transport
DVD	Digital Video Disc
DPTAC	Disabled Persons Transport Advisory Committee
ECMT	European Council of Ministers of Transport
LACORS	Local Authorities Coordinators of Regulatory Services
LTI	LTI Vehicles
LTP3	Local Transport Plan 3
NALEO	National Association of Licensing and Enforcement Officers
NPHA	National Private Hire Association
NTA	National Taxi Association
NVQ	National Vocational Qualification
PHV	Private Hire Vehicle
PSVAR	Public Service Vehicles Accessibility Regulations
TRL	Transport Research Laboratory
VOSA	Vehicle and Operator Services Agency
WAV	Wheelchair Accessible Vehicle

Question 1. 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?

1.1 Ninety-seven responses were received to this question (58.1% of the consultee total). The breakdown is shown in Table 5.

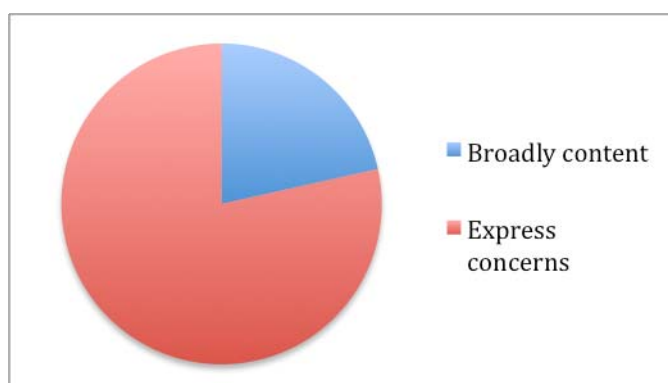
Table 5. Breakdown of respondents to Question 1

	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled groups or perspectives	18	18.6	40.9
Licensing Authorities or representative organisations	60	61.9	75
Vehicle manufacturers	3	3.1	100
Operators, drivers or operator organisations	16	16.5	47.1
Private individuals not identified elsewhere	1	1.0	50

1.2 **Twenty respondents** (20.6% of those who responded to Question 1) state that they **are broadly content with both the data and analysis in the consultation document**, using descriptive terms such as "comprehensive", "very clear", "accurate" and "extensive". These comprise 17 licensing authorities (28% of those who responded to Question 1), two disabled organisations (14%) and one operator (7%).

1.3 The **remainder of respondents who specifically state a view on the data and/or analysis** (73; 75.2% of respondents to Question 1) **express concern at one or more elements of either the data or the analysis**. Assessment of the concerns raised reveals a number of distinct themes. These are summarised below.

Figure 1. Respondents' broad views on the data and analysis



1.4 **A common generic view**, expounded by 12% of respondents to Question 1 (specifically, two disabled representatives, six licensing authorities and three operators), **is that further evidence-gathering and research is needed** before DfT finalises technical standards or, indeed, proposes any particular option. For these

consultees, the consultation document contains too many assumptions, too much anecdotal evidence, and offers data of inadequate quality. One key stakeholder (DPTAC) was particularly disappointed with the lack of evidence regarding the potential benefits of the two regulatory options.

1.5 A large number of consultees feel that the consultation document gives inadequate consideration to particular issues, notably:

- local circumstances;
- the needs of all disabled, rather than just wheelchair-users; and
- the needs of disabled people with specialised wheelchairs.

(a) Eleven per cent of respondents to Question 1 (eight licensing authorities and two operators) express concerns relating to **inadequate treatment of local circumstances**. They argue variously that communities have different levels and types of disability, and that local authority areas vary topographically (e.g. with different proportions of rural and urban areas). Accordingly, three licensing authorities and one operators agree with the proposal in the consultation document to retain local authority discretion over Hackney service provision.

(b) While noting (in many cases) the assertion in the consultation document that WAVs “may not meet the needs of many disabled people”, 29% of consultees express concern that **the data and its analysis focus overly on wheelchair accessibility** to the relative detriment of the wide range of ambulatory disability (i.e. disabled people who are not wheelchair users; this includes blind, partially sighted and deaf people).

- This view is shared by nine disabled representatives (including one key stakeholder, DPTAC), 12 licensing authorities (one key stakeholder, NALEO), six operators (one key stakeholder, NPHA) and one manufacturer (LTI, a key stakeholder).
- A common explanation given is that a saloon car enables some individuals with an ambulatory disability to enter and exit more easily than a WAV.
- Two respondents (a disabled representative and an operator) provide data suggesting that roughly just 5–8% of disabled people are wheelchair users.

(c) Five per cent of respondents (one disabled representative and four licensing authorities) suggest that **insufficient consideration is given to the needs of those with specialised wheelchairs**, or - more widely - to different wheelchair models that may become the norm by 2025, the compliance date for introduction of the technical specification used in the Impact Assessment.

1.6 In total, 20% of respondents raise concerns relating to inadequate data on the demand for WAVs. These comprise 14 licensing authorities (including one key stakeholder, NALEO), three operators and two disabled representatives.

- Some respondents believe that there is already a mismatch between demand and supply, recalling that the consultation document estimates that around 50% of Hackney carriages are WAVs - but arguing far less than 50% of passengers are wheelchair-users.
- Almost all respondents specify that nationwide research should be conducted to determine true demand levels to enable a decision as to whether there is an overall need for change.
- One licensing authority suggests taking greater heed of the demand surveys that local authorities conduct every three years.
- Another licensing authority recalls changing its policy on WAV provision in the light of such a demand-side survey.

1.7 Some **27% of respondents challenge various assumptions** given in the consultation document and/or Impact Assessment, particularly those on which calculations of compliance costs are based. These respondents comprise three disabled representatives (including DPTAC), 18 licensing authorities (including NALEO), three operators (including NPHA) and two manufacturers (including LTI). Regarding specific assumptions, respondents consider that DfT:

- (a) over-emphasises operators' preference for buying new taxis rather than cheaper used vehicles (if correct, this would lower compliance costs);
- (b) underestimates the duration for which saloon-car owners keep licensed vehicles, with many keeping them for 9–15 years rather than the four suggested (if correct, this would lower compliance costs);
- (c) underestimates the size of the used-car market, which some believe to be at least as large as the new vehicle market (if correct, this would lower compliance costs; LTI, a key manufacturer stakeholder considers that compliance costs are likely to be nearer £100m than £450m);
- (d) overlooks the availability of smaller modified vehicles that may be acceptable as WAVs to some licensing authorities, which are considerably cheaper, at £14,000, than standard WAVs (if correct, this would lower compliance costs);
- (e) omits to consider economies of scale, which may force the price of new WAVs down over time (if correct, this would lower compliance costs);
- (f) has omitted to include in calculations the cost of APR/financing (if correct, this would increase compliance costs); and/or
- (g) is not being realistic in using the current WAV price as an indication of future costs (if correct, this would increase compliance costs).

1.8 There are **other challenges to the cost and benefit considerations** given in the consultation document.

- (a) Six per cent of respondents (five licensing authorities, including NALEO, and one operator) are concerned that costs to licensing authorities have been underestimated. They dispute the assertion in the consultation document that any new requirements would not increase enforcement costs.
- (b) One licensing authority comments that the consultation document fails to take account that any additional 'costs on industry' would likely be passed through to customers through increased taxi fares, i.e. the consumer would ultimately pay. This respondent argues that the financial impact of requiring wheelchair accessible taxis ultimately depends on the ability and willingness of passengers to pay increased fares.
- (c) Three per cent of respondents (two disabled representatives and one licensing authority) believe the consultation document underestimates the societal and fiscal benefits likely to accrue, noting that improved accessibility for disabled people would lead to their increased employment, thereby reducing expenditure on state benefits and increasing revenue from income tax.
- (d) Four per cent of respondents (three disabled representatives and one manufacturer, LTI) argue that there is also inadequate consideration of the 'social justice' case for improving accessibility, including overcoming social exclusion.

1.9 Some respondents consider that there is **inadequate analysis of supply-side alternatives to WAV Hackney carriages**. Thirteen per cent (comprising three operators, including NPHA, and nine licensing authorities, including NALEO) dispute

the logicity of excluding private hire vehicles from consideration. Most regret that the figures given for the total national private hire fleet do not specify the number of disability-friendly vehicles, and consider this to be a serious omission. One licensing authority laments that alternative forms of transport (e.g. Dial-a-ride) are not factored into demand analysis.

1.10 Four per cent of respondents (all disabled representatives) consider that there is **inadequate analysis of the "other factors"** listed in the penultimate bullet of paragraph 2.10 of the consultation document. These include the impact of driver training and behaviour, physical environment, links with wider policies, and financial incentives or user subsidies on disabled people's use of taxis.

1.11 Two Scottish licensing authorities correct **apparent misunderstandings of specific legal procedures in Scotland**. In the consultation document:

(a) Paragraph 2.4 sets out the legislative powers available in the Disability Discrimination Act 1995 and, in particular, Sections 32-35. However, with the exception of Section 33, these provisions have no application to Scotland, since they refer to a "regulated taxi" and "taxi" in terms of vehicles licensed under either the Town Police Clauses Act 1837 or the Metropolitan Public Carriage Act 1869, both of which statutes do not apply in Scotland. Taxi licensing in Scotland is regulated under the Civic Government (Scotland) Act 1982 ("the 1982 Act"). This also applies to Section 36 of the DDA which refers to the driver of a "regulated taxi" in the same way as Sections 32-35. Accordingly, any proposals to introduce all-accessible taxi fleets and duties upon drivers of such vehicles in Scotland would be implemented by regulations under Section 39 of the DDA (and Section 20(2A) of the 1982 Act).

(b) Paragraph 2.7 suggests that the local authority would prosecute a driver's breach of the duty to give assistance. In Scotland, prosecution would actually be carried out by Procurator Fiscal and the expenses borne by the police and the Scottish Government through the costs of administering criminal courts.

1.12 Question 1 also asks consultees to provide any **further relevant data that might assist analysis**; 18% of respondents do so, comprising two disabled representatives, 12 licensing authorities, one manufacturer (LTI Vehicles) and two operators.

- One disabled representative draws attentions to its reports which provide evidence of disabled people's experiences of using taxi services, and the impact of inaccessible public transport on disabled people. Another identifies a variety of data sources from Scotland.
- One operator provides comparative data of disabled space provision across transport modes.
- The licensing authorities provide data relating to local circumstances.

1.13 In terms of the detail of **the views of key stakeholders**, DPTAC considers that the consultation document overemphasises wheelchair accessibility relative to wider disabled access. DPTAC considers some of the information on costs to be vague and to benefit from further research. DPTAC is disappointed that the Impact Assessment lacks even tentative evidence on the potential benefits of the two regulatory options.

1.14 NALEO believes that further research is essential before DfT finalises technical standards. It cautions that the needs of a wheelchair user differ from those of an ambulatory disabled person. Evidence of the overall need for change is a prerequisite before selecting the preferred option. NALEO laments the absence of

data about disability-friendly vehicles in the private hire fleet. NALEO challenges the assumption that saloon-car owners change their vehicle every four years and disagrees that there will not be significant resource implications for licensing authorities.

1.15 Of the two manufacturers, Allied Vehicles Ltd believes the data to be broadly sound but question the analysis. LTI Vehicles considers that compliance costs will be much lower than suggested. LTI questions a number of the basic assumptions behind the calculations, such as the belief that saloon-car owners buy used vehicles but WAV drivers buy new ones. They argue that the market for second-hand WAVs is greater than that for new ones. LTI shares the widespread belief that the disabled community have a wide range of disabilities and thus accessibility needs. LTI cautions that the cost of the enhanced specification cannot be estimated without significant research.

1.16 Of the operators, NTA regrets that it is very difficult to provide data and analysis. NPHA believes that a better evidence base is necessary before decisions can be taken. It argues that the ambulant disabled far outnumber wheelchair users but their needs are not addressed in the consultation document. NPHA suggests greater attention should be given to local differences. NPHA's preliminary investigations suggest that a complete recosting of options will be necessary as a number of the assumptions used appear to be flawed. NPHA note that many private hire fleets have WAVs and carry disabled passengers, yet this component of public transport is omitted from the consultation document.

Question 2. What do you think are the potential impacts, costs and benefits of the 'do nothing' scenario?

2.1 Ninety-five responses were received to this question (56.9% of the consultee total). The breakdown is shown in Table 6.

Table 6. Breakdown of respondents to Question 2

	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled groups or perspectives	18	19.0	41
Licensing Authorities or representative organisations	63	66.3	78
Vehicle manufacturers	3	3.1	100
Operators, drivers or operator organisations	11	11.6	32.4

2.2 Fifty-five respondents (58% of those who address the question) clearly state their **overall view on the acceptability of the 'do nothing' option**. (Others offer views on the impacts, costs and benefits but did not explicitly state a preference.) Of the 55 respondents, **six (11%) are in favour and 49 (89%) against**. These opinions can be assessed by stakeholder group:

- Six percent of disabled representatives favour no change to the status quo, but 94% reject that option;

- Eleven per cent of licensing authorities agree with the 'do nothing' approach, but 89% oppose it;
- One-quarter of operators (including one key stakeholder, NPHA) favour doing nothing, but three-quarters are against; and
- Both manufacturers who expressed a clear opinion, including one key stakeholder (LTI), object to doing nothing.

2.3 Respondents **identify a large number of impacts – whether positive, negative or neutral – associated with the 'do nothing' approach**. These can be grouped thematically, in terms of views on the impacts of the 'do nothing' approach:

- on disabled people;
- on WAV provision; and
- on particular stakeholder groups other than disabled people.

2.4 Forty consultees (42% of respondents to Question 2; 20 licensing authorities, 14 disabled representatives, three manufacturers and three operators) articulate views on the **likely impacts of a 'do nothing' approach on disabled people**. In broad terms, all but two respondents consider that disabled people would suffer as a result.

(a) Thirty-three respondents (35% of those who answered Question 2; comprising eight disabled representatives including DPTAC, a key stakeholder, 20 licensing authorities, two operators, and three manufacturers including LTI Vehicles and Allied Vehicles Ltd, both key stakeholders) argue that doing nothing **would not meet the transport needs or expectations of disabled people**, although three respondents included a caveat that needs would not be met should it be determined that current WAV provision is inadequate.

(b) Five respondents (four disabled representatives and once licensing authority) consider that this **would perpetuate discrimination and/or inconsistency in service provision**, one key stakeholder (DPTAC) arguing that accessible taxi provision amounted to a "postcode lottery" that determined, unacceptably, a disabled persons' access to medical services, a job interview or social engagement.

(c) Four disabled organisations echo the concern that the 'do nothing' approach would **perpetuate the social and economic exclusion of disabled people**.

2.5 Two respondents (single disabled representative and licensing authority) explicitly differentiate between wheelchair users and the ambulatory disabled, suggesting that there would be no impact on the latter group of passengers, who prefer travelling in saloon cars.

2.6 Allied to concerns about the impact on disabled people, nine respondents (9% of those who address Question 2) consider that the 'do nothing' approach is **incompatible with the provisions of the Disability Discrimination Act 1995**. These respondents comprise one disabled representative, six licensing authorities, and two manufacturers (including LTI Vehicles, a key stakeholder).

- four respondents argue that the Act's objectives would not be achieved;
- two consider that the Government would otherwise fail to deliver its independent living agenda; and
- three believe that licensing authorities would fail in their statutory duties to encourage the participation of disabled persons in public life, promote equality of opportunity between disabled persons and other persons, eliminate discrimination and promote positive attitudes towards disabled people.

2.7 Forty-four consultees (46% of those who address Question 2) offer views on the **likely impact of the 'do nothing' option on WAV provision**, both in terms of absolute numbers and geographical spread.

(a) In total, 29 respondents (31% of those who addressed Question 2) consider that WAV provision would suffer as a result of the 'do nothing' option.

(b) Specifically, 13 respondents (14% of those who responded to Question 2), all licensing authorities, consider that WAV provision would be unlikely to significantly increase.

(c) Eight respondents (8%), again all licensing authorities, consider that it would take many years to achieve any meaningful growth in WAV provision.

(d) Six respondents (6%), comprising four licensing authorities and two manufacturers (including LTI Vehicles, a key stakeholder) go further, arguing that WAV levels would decrease or risk diminishing.

(e) Two disabled representatives (including DPTAC, a key stakeholder) believe that 'doing nothing' may result in the UK lagging behind other countries in the provision of accessible taxis.

2.8 Although no respondents believed that WAV provision would increase as a result of the 'do nothing' option, three licensing authorities (including NALEO, a key stakeholder) considered that there would be no change either way.

2.9 Given that the 'do nothing' option would mean that local authorities continue to have responsibility for deciding local policies on WAVs, 16 respondents (17% of those who address Question 2) note that the provision of accessible taxi services would continue to be geographically inconsistent. These comprise three disabled representatives (including DPTAC, the key stakeholder), 11 licensing authorities, a single manufacturer and a single operator (LTI Vehicles, a key stakeholder).

2.10 A number of respondents consider **the impact on particular stakeholder groups other than disabled people**, specifically on licensing authorities, operators and manufacturers.

(a) Eleven respondents (12% of those who address Question 2), comprising 10 licensing authorities and one disabled representative, comment on the impact on licensing authorities.

- Four licensing authorities argue that the 'do nothing' policy will enable the continuation of local management that is responsive to local needs.
- Four licensing authorities and one disabled representative fear that some licensing authorities would do nothing to improve accessibility.
- Two licensing authorities believe that complaint levels would consequently rise.

(b) Eight respondents (8% of those who address Question 2; all licensing authorities) argue that the 'do nothing' option – with the associated absence of clear central Government policy or regulation – will increase the likelihood of legal challenges against licensing authorities that seek to provide accessible taxi fleets. In turn, one licensing authority argues, the associated cost implications may force licensing authorities to abandon such policies, which, in turn, would reduce WAV provision.

(c) Seven respondents (7% of those who address Question 2) – one disabled representative and six licensing authorities – give a view on impacts on operators and drivers.

- Four (one disabled representative and three licensing authorities) believe there would be no incentive for taxi drivers to provide WAVs.
- Three licensing authorities believe there would no incentive for tax drivers to change their behaviour (an issue addressed in Question 8).

(d) Two respondents (single disabled representative and manufacturer, the latter a key stakeholder, LTI Vehicles) consider that the 'do nothing' option would provide no incentive for manufacturers and vehicle converters to improve the accessibility of taxis.

2.11 Question 2 also seeks input on **the costs of the 'do nothing' approach**, an issue on which 16% of respondents to the question express a view. Respondents comprise 13 licensing authorities and two disabled representatives.

(a) Eight licensing authorities consider that there would be no additional costs on the taxi industry, which leads two to suggest that this would reduce the feared migration of drivers from WAVs to PHVs.

(b) Two licensing authorities believe there would be no costs on either central or local government. In contrast two licensing authorities believe that licensing authorities will largely bear the brunt of the costs associated with the introduction of new wheelchair-accessible vehicles as they will be reflected in tender costs for education and social work contracts.

(c) Two licensing authorities believe that licensing authorities and the trade will face the cost of the likely increase in legal challenges.

(d) One licensing authority considers the costs will be unknown.

(e) Two disabled representatives (including DPTAC, key stakeholder) consider that doing nothing is the cheapest option for now but that it will undoubtedly be more expensive trying to catch up at a later date.

2.12 Nineteen respondents (20% of those who consider Question 2) give views on **the benefits of a 'do nothing' approach**. Seven – five licensing authorities, one disabled representative and one manufacturer (LTI Vehicles, a key stakeholder) – argue that there are no benefits. Of those that consider there to be benefits:

(a) one licensing authority argues that doing nothing would allow the taxi industry time to adapt;

(b) two licensing authorities and one operator argue that doing nothing would allow the current practice of local flexibility to continue; and

(c) nine respondents consider that the lack of costs would comprise a key benefit (in some cases, because this would reduce the possibility of WAV drivers leaving the industry). These comprise seven licensing authorities, one operator and one disabled representative, the key stakeholder DPTAC.

2.13 In terms of the detail of **the views of key stakeholders**, DPTAC advises that doing nothing is not an option as it would be the detriment of mobility generally. DPTAC argues that a postcode lottery of accessible taxi provision should not be the determining factor in whether an independent disabled person can make a hospital appointment, job interview or social engagement. DPTAC believes that leaving the accessibility of taxis to local authorities may mean them not giving priority in expenditure to improving access. DPTAC fears that the UK may lag behind other countries in the provision of accessible taxis, which may affect the country's image among disabled tourists and business-people. While acknowledging the cost-savings

of doing nothing, DPTAC argues that the costs of catching up later may be more expensive.

2.14 NALEO believes that the lack of additional costs on the taxi industry would reduce the risk of migration from WAVs to private hire. As a result, there would be no reduction in number of WAVs - but no increase either. NALEO considers that there would be no impact on ambulatory disabled passengers who prefer saloon cars. However, NALEO considers that without additional driver training, the incidence of drivers not answering hails from wheelchair users will not reduce.

2.15 Of manufacturers, Allied Vehicles Ltd considers that disabled people would continue to be disadvantaged. LTI vehicles consider that doing nothing would result in a reduction in WAV numbers because licensing authorities would not adopt accessibility policies. LTI Vehicles forecasts no improvement for the disabled population. LTI argues that there would be no incentive for manufacturers and vehicle-converters to improve accessibility features. LTI regrets that the Government would fail to deliver on its independent living agenda. LTI predicts continuation of the huge differences in accessibility levels across local authorities.

2.16 Of operators, NPHA believes that, at present, 'do nothing' is the only viable option, as costs of the other options would be too great. NTA believes that guidance is the most appropriate means of implementing the DDA 1995. That DfT is consulting at all indicates that the 'do nothing' approach is not working.

Question 3. 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?

3.1 Although 95 consultees (57% of consultee total) give responses to Question 2 on the potential impacts, costs and benefits of the 'do nothing' scenario, just 18 (10.8% of consultee total, and 21% of those who responded to Question 2) are able to make available data (whether anecdotal or quantifiable) on those potential costs and benefits. The breakdown of respondents is shown in Table 7.

Table 7. Breakdown of respondents to Question 3

	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled groups or perspectives	3	16.7	6.8
Licensing Authorities or representative organisations	10	55.6	12.5
Vehicle manufacturers	1	5.5	33.3
Operators, drivers or operator organisations	4	4.2	11.8

3.2 Most respondents to Question 3 draw attention to previously published survey data rather than providing new data.

(a) Two respondents (one licensing authority, one disabled representative) recall research by the University of Glasgow that suggested that the current provision of

transport in Edinburgh is insufficiently accessible for disabled people who wish to use it to travel to recreational and leisure facilities.

(b) One disabled representative draws attention to the MACS survey produced for the Scottish Government.

(c) One disabled representative suggests that it may be useful to take into account evidence-based research into the costs of exclusion with the Equality and Human Rights Commission, the Office for Disability Issues and the National Centre for Independent Living.

(d) Three licensing authorities summarise the key findings of demand-side surveys in Colchester, Elmbridge and Harrogate; all suggest that supply is sufficient to meet demand, and thus that the 'do nothing' scenario would have no adverse impacts.

(e) An operator draws attention to three surveys of demand by disabled people in Bedford, Brighton and Cambridge. In Bedford, 20% of wheelchair users and 9% of ambulatory disabled express an active preference for WAVs rather than other forms of taxi. In Cambridge, the equivalent figures are 40% and 13%. In Brighton, 22% of disabled people (with no further classification by wheelchair use) prefer WAVs.

3.3 Five respondents (three licensing authorities, one operator and one manufacturer) provide or offer to provide raw data.

(a) The operator (NPHA, a key stakeholder) notes that, under the 'do nothing' scenario, 87% of taxi drivers are already working very long hours to make less than the minimum wage.

(b) The manufacturer (Allied Vehicles Ltd, a key stakeholder) offers to supply information that illustrates the continued disadvantage to disabled people in many areas of restrictive or inappropriate taxi regulation.

(c) Two licensing authorities illustrate the cost to a licensing authority of an appeal against a refusal to grant a licence: £10,000 or "thousands of pounds" in a magistrates' court or £20,000 in a Crown Court.

(d) One licensing authority notes that one problem of the 'do nothing' scenario not mentioned in the consultation document relates to the value of licence plates. The authority notes anecdotal evidence that saloon car plates were being sold for between £10,000 - £20,000.

Question 4. 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?

4.1 Question 4 relates to one element ("a comprehensive package of guidance") of the option of a proactive programme of DfT-led initiatives. Ninety-two responses were received (55.1% of the consultee total). The breakdown is shown in Table 8.

Table 8. Breakdown of respondents to Question 4

	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled groups or perspectives	17	18.5	38.6
Licensing Authorities or representative organisations	61	66.3	75
Vehicle manufacturers	3	3.3	100
Operators, drivers or operator organisations	9	9.8	26.5
Private individuals not identified elsewhere	2	2.2	100

4.2 A number of respondents give **generic responses** to Question 4.

- Six consultees (6.5% of those who address Question 4; comprising four disabled representatives and two licensing authorities) are content with the type and nature of guidance suggested in the consultation document.
- In contrast, 18% of those who responded to this question (specifically three disabled representatives, 10 licensing authorities, three manufacturers including both key stakeholders, and one operator) consider that guidance *per se* will be inadequate to effect the desired improvements in accessibility; all bar the disabled representatives advise that regulation would be more effective.

4.3 Nine respondents comment on the suggestion that the **guidance might apply to PHVs as well as to Hackney carriages**. One disabled representative opposes this idea, but eight licensing authorities support it.

4.4 The first part of Question 4 seeks views on **what type of guidance would be most effective**. Twenty-one respondents give advice on the style and nature of the guidance (irrespective of its content).

(a) The key themes that emerge are that the guidance should be:

- clear, unambiguous and in plain English;
- easy to read, perhaps using bullet points for clarity;
- regularly updated; and
- developed in consultation with key stakeholders at a national and/or regional level.

(b) Single responses also suggest that the guidance should be:

- framed at the national level;
- reflective of regional or sub-national perspectives;
- comprehensive; and
- prescriptive.

4.5 More than four-fifths of respondents do not explicitly state who they consider **the audience for guidance** to be. In contrast, 16 respondents (17% of respondents to Question 2; 14 licensing authorities, two disabled representatives including DPTAC, a key stakeholder) clarify their understanding of the intended recipients – and this reveals interesting differences in perception. The audiences are:

- licensing authorities alone (as proposed by eight licensing authorities and one individual);
- taxi industry alone (one disabled representative; DPTAC, a key stakeholder);

- taxi industry *and* licensing authorities (one disabled representative and four licensing authorities); and
- manufacturers/converters and taxi industry (one licensing authority).

4.6 Just over one-quarter of respondents (four disabled representatives, 17 licensing authorities, two operators and an individual) focus on **the topics that the guidance might cover**. Suggestions common to three or more respondents comprise the following:

- advice on disability awareness and training, covering different types of disability and address perceived barriers to providing disabled people with access to taxis (proposed by four disabled representatives, five licensing authorities and one operator);
- advice on how to decide and/or implement appropriate ratios for WAVs within an overall fleet (eight licensing authorities, one individual);
- examples of good practice (two disabled representatives, two licensing authorities, one operator and one individual);
- technical specifications for vehicles (one disabled representative, seven licensing authorities); and
- advice on how local authorities should comply with their duties under the Disability Discrimination Act 1995 (three licensing authorities).

4.7 A number of other suggestions for content were made by one or more respondents. These comprise the following:

- advice on developing a joined up travel infrastructure;
- an exposition of the benefits to the taxi industry;
- an analysis of the costs and benefits;
- a summary of existing regulations and requirements as well as new measures;
- advice on monitoring and enforcement;
- advice on health and safety issues;
- advice on insurance requirements; and
- advice on obtaining local demand survey data.

4.9 The second part of Question 4 seeks **views on suitable formats for the guidance**. Just over one-quarter of respondents address this element (specifically, six disabled representatives including the key stakeholder DPTAC, and 20 licensing authorities). A variety of modes are suggested, in part reflecting the respondent's view of the target audience for guidance. These comprise the following:

- hard copy only, either in the form of a guidance handbooks for taxi drivers (one licensing authority) or as a statutory Code of Practice (single disabled representative and licensing authority);
- electronic version only, available on the internet (five licensing authorities);
- hard copy and internet versions (two disabled representatives and 12 licensing authorities); and
- audio-visual means, such as a DVD, CD, video or podcast (four licensing authorities and three disabled representatives including DPTAC, a key stakeholder).

4.10 The third and final part of Question 4 seeks **views on what the DfT might do to promote take-up**. Thirty-seven consultees (40% of those who address this question) respond, comprising five disabled representatives, 26 licensing authorities, four operators and single standards organisation and individual. Consultees suggest a number of potential mechanisms to promote take-up. These are outlined below together with an indication of their level of support.

- (a) Ten consultees (eight licensing authorities and two operators) suggest that it would be most effective for DfT to work with key stakeholders on drawing up the guidance, which would increase the chances of them being willing to disseminate the outcome to their members.
- (b) Ten consultees (two disabled representatives, including the key stakeholder NALEO, seven licensing authorities, one standards organisation) advocate a major publicity campaign, but have different views on its form and nature. Two licensing authorities suggest a national awareness campaign; four licensing authorities and one standards organisation propose regional seminars or roadshows, perhaps run in conjunction with the Institute of Licensing or NALEO. Guidance might also be made available in public places.
- (c) Two consultees (operator, licensing authority) suggest using either the daily press or trade publications to communicate key messages.
- (d) Given that most taxi drivers are self-employed and thus potentially hard to reach, four respondents (two each of disabled organisations and licensing authorities) suggest working with trade associations to communicate the guidance to their members and, in one case, to promote the benefits of exploiting a wider market.
- (e) Five respondents (two disabled representatives and three licensing authorities) suggest mainstreaming the guidance into local authority taxi-licensing conditions.
- (f) Four respondents (single disabled representative [DPTAC], licensing authority, operator and individual) propose that DfT promote the new guidance through the Local Government Association, licensing authorities and other licensing bodies, with a specific suggestion (by DPTAC) of a DfT-sponsored day conference.
- (g) Two licensing authorities suggest incorporating the guidance into training initiatives for taxi drivers, including that provided by at least one local police force.
- (h) Three licensing authorities and one disabled representative propose that DfT might incentivise uptake in some way, with options including Taxicards, financial incentives and free training.
- (i) One disabled representative suggests communicating the new user rights and opportunities through use representative bodies.

4.11 Of the **key stakeholders**, DPTAC argues for guidance that specifies technical requirements without venturing into actual vehicle models, and ensures that licensing authorities and trade bodies are clear about legislative requirements and best practice. The guidance might also cover health and safety, and insurance issues. To promote the guidance, DPTAC suggest a day conference, consultation with key stakeholder bodies, and the production of audio-visual products. NALEO considers that appropriate subjects for guidance could include: driver training on disability awareness, and advice on obtaining local demand survey data. NALEO suggest that DfT continue to work closely with trade bodies to promote acceptance of the guidance. Allied Vehicles Ltd and LTI Vehicles both argue that guidance will be inadequate to change the status quo. NTA advocates guidance, the strengthening of links with the local transport planning regime and incentives. NPHA suggests that guidance should be to local authorities and should cover steps they are to take before deciding on fleet make-up.

Question 5. 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?

5.1 One hundred responses were received to this question (59.9% of the consultee total). The breakdown of respondents is shown in Table 9.

Table 9. Breakdown of respondents to Question 5

	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled groups or perspectives	20	20	45.5
Licensing Authorities or representative organisations	62	62	76.5
Vehicle manufacturers	3	3	100
Operators, drivers or operator organisations	13	13	38.2
Private individuals not identified elsewhere	2	2	100

5.2 The **technical aspects of responses** to this and the other two technical/enforcement questions (questions 16 and 19) **are covered in the Annex**. Here we **cover only non-technical issues** arising from the responses.

5.3 Five licensing authorities, including NALEO (a key stakeholder), argue that the **technical specifications will only improve accessibility levels if they are enshrined in a regulation** (i.e. rather than guidance) and are thus enforceable and enforced.

5.4 Eight respondents (six licensing authorities, one manufacturer, one operator) suggest incorporation of the specification into the European Whole Vehicle Type Approval system. This would reduce the technical knowledge needed by licensing officers from local authorities.

5.5 A number of respondents consider that the specifications ignore features that would improve accessibility for other categories of disabled people.

- In generic terms, three licensing authorities and one operator suggest further research to ensure that any technical specification issued accurately reflects the needs of the suite of disabled users.
- Four respondents (two each of disabled representative and licensing authority) think there is insufficient focus on the requirements of blind or partially sighted people. They suggest incorporating communications devices into the main set of requirements.
- Additional proposals recommend that all vehicles should be capable of accommodating guide dogs; that functional induction loops be fitted to assist the deaf; and that lifts be fitted to reduce driver strain.

5.6 Three respondents (two licensing authorities and one operator) express concern that the older Fairways and Metrocabs would not meet the interim

specification. They fear that overall WAV provision would suffer as a result of these vehicles being taken out of business.

5.7 Seven respondents (five licensing authorities, including NALEO, a key stakeholder, one operator and one manufacturer) suggest moving from the interim specification to the enhanced specification only when a number of conditions have been met, i.e. when:

- the term 'disability' has been more clearly defined;
- demand from ambulatory disabled has been quantified;
- expectations from wheelchair users of WAV provision have been quantified;
- clearly compliant vehicles are available; and
- costs are a known quantity.

Question 6. What do you think are the advantages and disadvantages of DfT-funded demonstration schemes?

6.1 Ninety-eight responses were received to this question (59.3% of the consultee total). The breakdown of respondents is shown in Table 10.

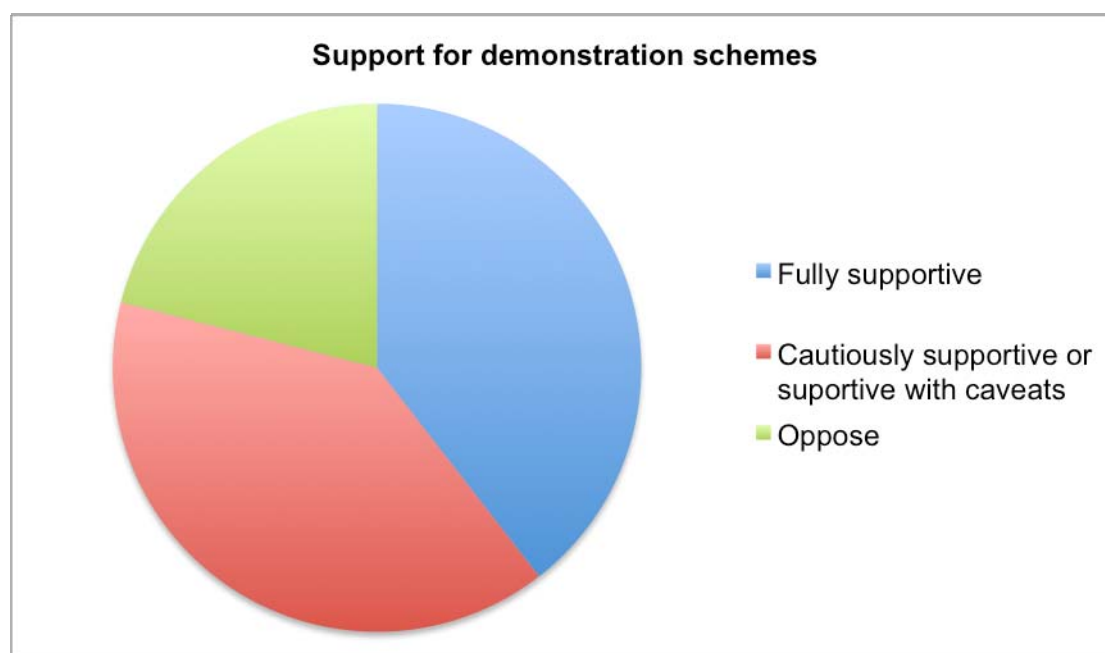
Table 10. Breakdown of respondents to Question 6

	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled groups or perspectives	20	20.4	45.4
Licensing Authorities or representative organisations	61	62.2	76.2
Vehicle manufacturers	3	3.1	100
Operators, drivers or operator organisations	12	12.2	35.3
Training organisation	1	1.0	100
Private individuals not identified elsewhere	1	1.0	50

6.2 Although the question does not ask whether or not consultees support **the concept of demonstration schemes**, 43 respondents (44% of the total number who address Question 6; comprising ten disabled organisations, 31 licensing authorities, two operators) take the opportunity to explicitly **give their overall view on the desirability of the idea**. These overall results are shown in Figure 2.

- Seventeen respondents (39.5% of those who clearly express a firm view) are fully supportive of demonstration schemes;
- the same number (and proportion) are cautiously supportive or offer support with caveats; and
- nine (21%) oppose demonstration schemes.

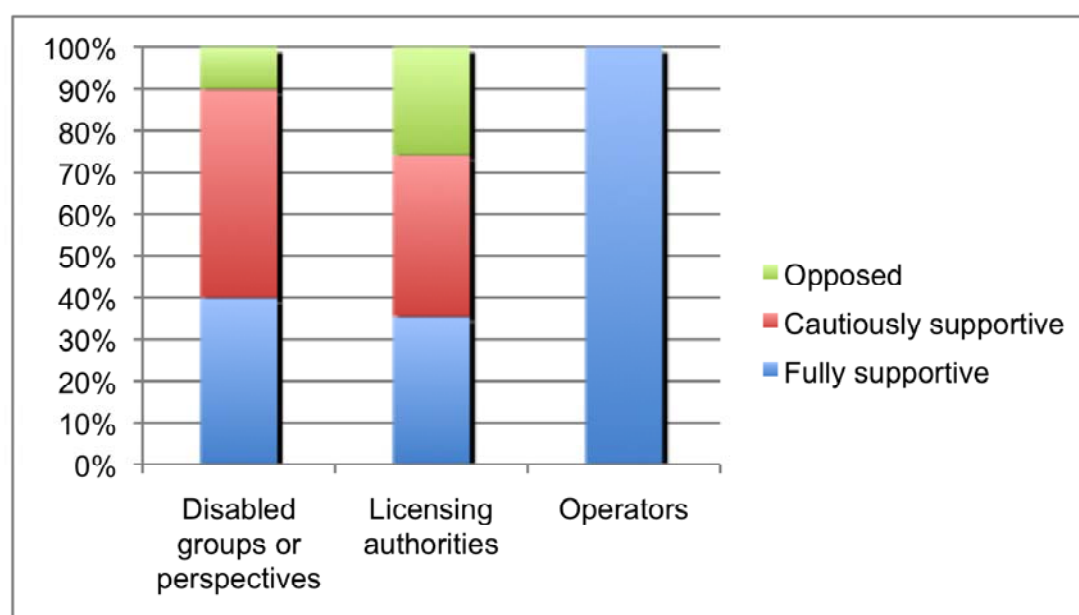
Figure 2. Respondents' overall views on demonstration schemes



6.3 These views can also be assessed by stakeholder group. These results are also shown in Figure 3.

- Among disabled representatives, 40% are fully supportive, 50% cautiously supportive and 10% opposed;
- Among licensing authorities, 35.5% are supportive, 38.7% cautiously supportive, and 25.8% against; and
- Both operators are fully supportive (100%).

Figure 3. Views on the concept of a demonstration scheme, by stakeholder group



6.4 Respondents to Question 6 identify a large number of **advantages of a DfT-funded demonstration scheme**. While nuances and phrasing clearly vary between stakeholders, the key themes that emerge follow (summarised in Figure 4).

(a) Nineteen respondents (19.2% of those who respond to this question; comprising four disabled representatives, including the key stakeholder DPTAC, 14 licensing authorities and one individual) consider that **demonstration schemes would enable 'learning by doing'**. Demonstration schemes would:

- harness local knowledge and experience;
- offer opportunities to trial proposals, roadtest new taxis and test guidance;
- permit an assessment of what works and what doesn't, in different types of area; and
- allow licensing authorities to have first-hand experience of developments.

(b) Twenty respondents (20.2% of those who respond to this question; comprising five disabled representatives, including DPTAC, 13 licensing authorities and two operators) consider that **demonstration schemes would enable DfT to strengthen the evidence base** that is necessary to inform decision-making. In this context, demonstration schemes would:

- enable the capture of accurate data on all elements of the licensing process including the effect of the regulations on the trade and licensing authorities;
- help identify real demand levels for WAVs - and their usage levels - across different types of area;
- collect real data on the pros and cons of the various options tested;
- enable assessment of impacts of the various options tested for all passengers (not just the disabled);
- reveal the likely extent of any migration from hackney carriages to PHVs;
- enable effective feedback to be provided from a cross-section of licensing authorities;
- help ascertain further evidence of how access to taxis could be improved; and
- be used to gather evidence of costs and benefits.

(c) Nine consultees (9.1% of respondents to Question 6; comprising two disabled representatives, six licensing authorities, one training organisations) argue that **demonstration schemes would enable the compilation and subsequent dissemination of good practice examples**.

(d) Twelve respondents (12.1% of respondents; comprising four disabled representatives, five licensing authorities, two operators and one training organisation) think that **demonstration schemes would be useful for awareness-raising**, and the same proportion (four disabled representatives, including DPTAC, a key stakeholder, six licensing authorities and one training organisation) consider them **advantageous for training purposes**.

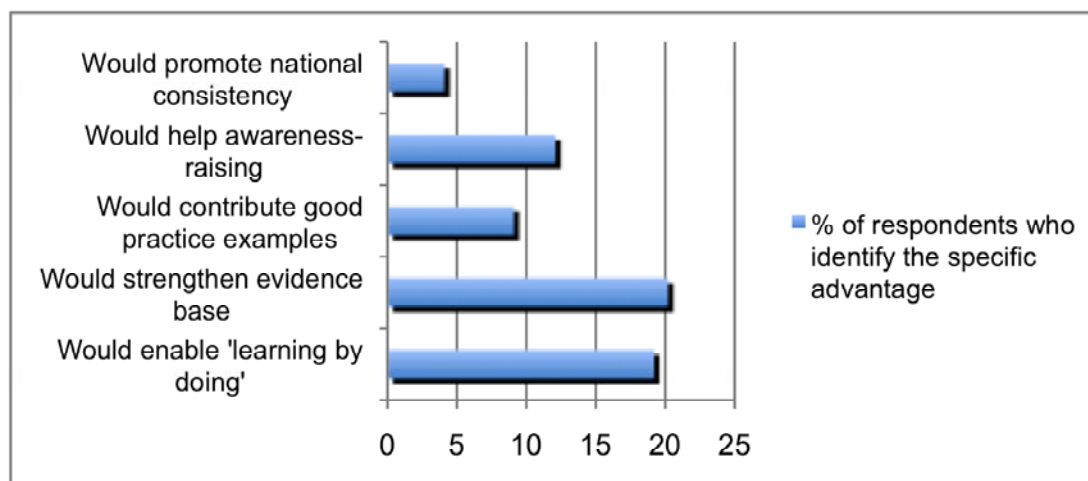
(e) Four respondents (4.1% of all those who addressed Question 6; all licensing authorities) consider that **demonstration schemes would help promote consistency on a national level**, an important issue given the local flexibility currently afforded to licensing authorities.

(f) Three licensing authorities suggest that a major benefit of demonstration schemes was **DfT's offer to pay for them**, i.e. they would be cost-neutral for both licensing authorities and the industry.

(g) Two respondents (single disabled representative and licensing authority) believe that **demonstration schemes might substantively address the issue in pilot areas**, e.g. through encouraging update of accessible taxis. One disabled representative considers that DfT stands to derive presentational benefit as the very fact of running demonstration schemes would provide evidence of its commitment to resolving the issue. The same consultee also argues that an

explanation of changes from the "horse's mouth" (i.e. DfT) should increase the likelihood of licensing authorities accepting the any requirements.

Figure 4. Respondents' views on specific advantages of a DfT-funded demonstration scheme

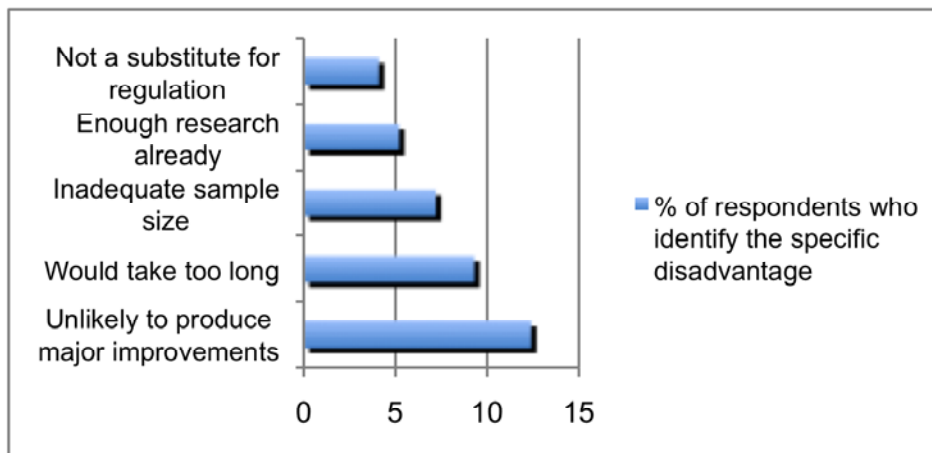


6.12 Respondents also identify a number of **disadvantages** of the demonstration scheme option. The key themes that emerge (summarised in Figure 5) are as follows.

- (a) Twelve respondents (12.4% of respondents to Question 6; four disabled representatives, seven licensing authorities and one operator) **doubt that the demonstration schemes would be likely to produce major improvements in the pilot areas**, in part because of their small size. As such they would have limited value, would be cost-ineffective and would offer taxpayers little benefit.
- (b) Nine consultees (9.3% of respondents to Question 6; comprising two disabled representatives and seven licensing authorities) fear that **properly implemented demonstration schemes would take too long**. Some argue that the time might better be spent working more closely with all key stakeholders. One licensing authority further fears that continued delay is likely to increase the prospect of legal challenge.
- (c) Seven respondents (7.2%; comprising single disabled representative and research organisation, five licensing authorities) argue that the suggested **sample size of the demonstration schemes** (three or four pilot areas) **would be an inadequate** basis from which to draw nationwide conclusions.
- (d) Five respondents (5.2% of those who addressed Question 6; all licensing authorities) consider there is **already a surfeit of existing research** on taxi accessibility standards, thus arguing that it is unclear what added value the demonstration schemes would provide.
- (e) Four consultees (4.1%; one disabled representative and all three manufacturers, including the two key stakeholders LTI Vehicles and Allied Vehicles) argue that there is **no substitute for regulation**. Demonstration schemes and other training initiatives would be ineffective without a legally enforceable basis for administration.
- (f) Four consultees (two each of licensing authorities and disabled representatives) each identify a **potential issue viz à viz local authorities**.

- Licensing authorities selected as pilot areas may subsequently face increased resource requirements as a result of being asked to mentor other licensing authorities. There may be accusations of favouritism directed at the selected areas.
- Central Government may face accusations of being overly prescriptive. And the demonstration schemes may encounter conflicts between central Government and local authority initiatives.

Figure 5. Respondents' views on specific disadvantages of a DfT-funded demonstration scheme



6.13 A number of consultees also raise issues that might best be categorised as **notes of caution or suggestions for effective implementation** of demonstration schemes rather than disadvantages. The most pertinent of these issues appear to be the following:

- clear objectives are essential as is achievability;
- pilot areas must be carefully selected if meaningful conclusions are to be drawn from them;
- demonstration schemes should be carefully designed in consultation with key stakeholders;
- care should be taken that demonstration schemes do not impose cost burdens on industry - so all costs should be covered by DfT;
- roll-out will need to be consistent across the pilot areas;
- caution that voluntary action may only actually occur in areas (particularly urban areas) where a strong business case for change already exists;
- it would be useful for demonstration project to link taxis into the wider accessible transport system;
- demonstration schemes may need to be tailored appropriately for each type of audience, whether licensing authorities or trade associations (a comment from DPTAC, a key stakeholder); and
- all demonstration projects should be carefully evaluated, perhaps by a multi-stakeholder panel.

6.14 Regarding **key stakeholders**, DPTAC argue that DfT-funded demonstration schemes have the advantage of getting the industry to look at different ways of providing accessible services, that they would not otherwise finance themselves. DPTAC considers that the schemes might be used to provide drivers with disability awareness training and be used to elicit data on costs and benefits of various options. DPTAC argues that DfT needs to be clear on its target audience, for the

demonstration schemes, whether licensing authorities or trade associations, and to tailor the schemes accordingly. Demonstration schemes may need to be tailored appropriately for each type of audience.

6.15 NALEO argues that demonstration schemes should not impose new requirements without offering much in the way of reward. Doing so might be counterproductive. NPHA stresses the importance of fully integrated local transport plans in which taxis play a key part. NTA doubts whether demonstration schemes would be effective, but would not oppose them or their proposed elements. Allied Vehicles Ltd argues that demonstration schemes may be helpful, but that regulation is also necessary. LTI Vehicles believes that demonstration schemes are unlikely to deliver the results required by government, disability groups or local authorities.

Question 7. What do you think would be the most effective ways of influencing action by local licensing authorities, drivers and manufacturers?

7.1 Ninety-six responses were received to this question (57.5% of the consultee total). The breakdown of respondents is shown in Table 11.

Table 11. Breakdown of respondents to Question 7

	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled groups or perspectives	18	18.7	40.9
Licensing Authorities or representative organisations	63	65.6	77.8
Vehicle manufacturers	3	3.1	100
Operators, drivers or operator organisations	11	11.5	36.7
Private individuals not identified elsewhere	1	1.0	50

7.2 Forty respondents (41.6% of those who address the question) **offer views on how to influence all three stakeholder groups** specified in Question 7 (i.e. local licensing authorities, drivers and manufacturers). These respondents comprise 12 disabled representatives (including DPTAC, key stakeholder), 23 licensing authorities (including NALEO, a key stakeholder), three manufacturers (including two key stakeholders, LTI Vehicles and Allied Vehicles) and two operators.

(a) Thirty respondents (31.2%) believe that the most effective way to influence all three parties would be by regulation that makes it mandatory to use WAVs by a set date. Advocates comprises nine disabled representatives (including DPTAC), 17 licensing authorities (including NALEO), all three manufacturers and one operator.

(b) Seven respondents (7.3%; one disabled representative and six licensing authorities, including NALEO) emphasise the importance of getting all stakeholders to work together in a DfT-funded forum. The forum's responsibilities could include developing and agreeing guidance and specifications and producing a Code of Practice for licensing authorities.

(c) Three respondents (two disabled representatives, including DPTAC, and one licensing authority) argue for strengthening the analysis and promotion of benefits to provide a clearer justification for the chosen course(s) of action.

(d) Two respondents (single disabled representative and licensing authority) suggest that involving disabled people in communicating the need for change would be likely to influence driver attitudes.

(e) Additional suggestions from single respondents comprise:

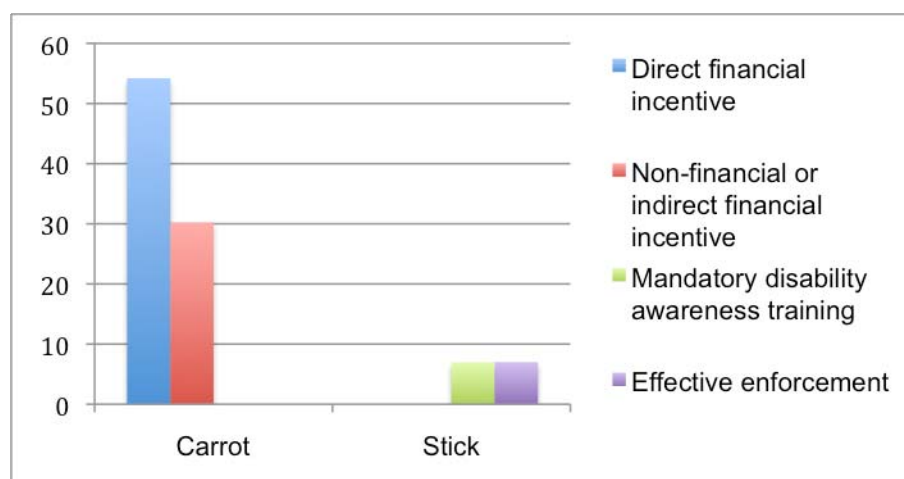
- not seeking to influence the key players, but instead letting the market, trade and licensing authorities to make local decisions (the view of a licensing authority); and
- avoiding deterring players by ensuring that timescales for change are realistic (operator).

7.3 Nineteen respondents (19.8%; all licensing authorities, including NALEO, with the exception of DPTAC and two operators) specify possible **ways in which to influence licensing authorities**. Views were varied and there was no broad consensus on any option; indeed, no option had more than five supporters. In roughly decreasing order of support, the suggestions were as follows:

- provide guidance, including on how to set suitable targets for WAV provision;
- review and update obsolete legislation, including addressing the PHV trade;
- produce a Code of Practice that enjoys broad stakeholder agreement, and require licensing authorities to justify any departure from its provisions (a suggestion supported by NALEO)
- continue to allow local decision-making to address local needs;
- produce local demand surveys to provide a robust evidence base for local decisions; and
- use demonstration schemes astutely (a suggestion from DPTAC).

7.4 Seventy-two respondents (75% of those who address Question 7; comprising 16 disabled representatives, 48 licensing authorities, two manufacturers, five operators and one individual) give their **views on how to influence drivers**. The suggested options include **both 'carrots' and 'sticks'**. Most consultees suggest a combination. Views are summarised in Figure 6.

Figure 6. Suggestions for influencing drivers



7.5 **'Carrots'** are favoured by 65 of the 96 respondents to Question 7 (67.7%). Supporters of this broad approach comprise 11 disabled representatives, 46 licensing authorities, five operators, two manufacturers and one individual.

(a) Fifty-two respondents (54.2% of those who addressed Question 7) favour the 'carrot' being some form of direct financial incentive. These comprise nine disabled representatives, 37 licensing authorities, four operators, one manufacturer and one individual. A variety of non-mutually exclusive financial incentives are suggested; most consultees support more than one option. In rough descending order of popularity, these are:

- VAT exemption on initial purchase (18 supporters: three disabled representatives, 13 licensing authorities and two operators);
- reduced licence fees (17 supporters: one disabled representative, 14 licensing authorities, two operators);
- Government subsidy for WAVs (14 supporters: two disabled representatives, 11 licensing authorities and one manufacturer);
- meaningfully reduced vehicle excise duty (12 supporters: two disabled representatives, nine licensing authorities and one operator);
- eligibility of WAVs for bus fuel rebate (11 supporters: nine licensing authorities and two operators);
- Government interest-free loans for WAV purchase (six supporters: five licensing authorities and one operator); and
- significantly reduced or zero road fund tax (three supporters: two licensing authorities, one operator).

(b) Some consultees express caution about such financial incentives. Two licensing authorities suggest that they would have a negligible effect unless the levels are high. Four licensing authorities are wary of the impact of a reduced licensing fee on licensing authorities, two arguing that any financial shortfall should be met by central Government.

(c) Twenty-nine respondents (30.2% of those who addressed Question 7) favour the 'carrot' being some form of non-financial incentive or indirect financial incentive. These comprise six disabled representatives, 20 licensing authorities, two operators and one manufacturer. A variety of non-mutually exclusive incentives are suggested; most consultees support more than one option. In rough descending order of popularity, these are:

- allow WAVs exclusive access to bus lanes and other restricted areas (ten supporters: three disabled representatives, six licensing authorities and one operator);
- encourage service funders to link NVQ2 training to local authority-managed income sources, such as schools and social services contracts (five supporters; four licensing authorities, including NALFO, and one operator);
- introduce a national requirement for WAV-only spaces at taxi stands (five supporters: four licensing authorities and one operator);
- offer disability-related training that leads to a NVQ2 qualification (four supporters; one disabled representative and three licensing authorities);
- make provision for an 'accessibility charge supplement' (like London's 'emissions charge supplement') to be added to taxi fares as set by LAs (two licensing authorities);
- permit longer licence durations for WAVs relative to other vehicles (one licensing authority); and
- remove barriers to entry in certain taxi markets, such as London (one manufacturer, the key stakeholder Allied Vehicles).

7.6 In total, '**sticks**' are favoured by 11 respondents (11.5% of those who address Question 7), comprising six disabled representatives (including DPTAC) and five licensing authorities. There are two broad options suggested, which garner roughly equal support:

- make disability awareness training a mandatory part of license granting; and
- ensure that there is effective enforcement and inspection, such as through 'secret shoppers'.

7.7 A handful of consultees make **additional suggestions for influencing drivers** that do not really count as direct carrots or sticks. These comprise:

- demand-side measures that seek to reduce costs to users and thus increase the likelihood of disabled people using taxis;
- encourage taxi operators and associations to coordinate and present a unified voice in discussions with decision-makers;
- wide publicity about the scope for increased business.

7.8 Nine consultees (9.4%; two disabled representatives including DPTAC, five licensing authorities, and two operators, including the key stakeholder NPHA) suggest **possible ways to influence manufacturers**. The suggestions are varied and none secures wide support:

- introduce a national design competition for manufacturers;
- reduce development costs through Government funding, perhaps in conjunction with other European Union member states who face similar issues;
- avoid specifying actual dimensions in the technical specification, thereby allowing manufacturers greater freedom;
- give manufacturers early certainty about specifications;
- provide evidence that persuade manufacturers that there will be a healthy demand for new vehicles; and
- reduce taxes for those who manufacture WAVs.

7.9 Among **key stakeholders**, DPTAC argue that regulation is the most effective approach to influence licensing authorities and that compliance might best be ensured through a range of enforcement and inspection measures, proportionate to risk. DPTAC argues that DfT should research and promote the benefits of having accessible taxis. DPTAC considers that demonstration schemes might influence licensing authorities, the local authority and licensing community. DPTAC also suggests that DfT might seek European funding and look at ways to pool funding with the Passenger Transport Authorities and motor manufacturers with a view to researching and developing an all-purpose taxi for the motor manufacturing industry.

7.10 NALEO suggests a DfT-funded forum of key stakeholders could work on guidance, technical specifications and a Code of Practice. Licensing authorities could be required to follow this Code, and required to justify any departures from it. With regards drivers, NALEO suggests that service funders be encouraged to link NVQ2 training to access to income sources such as school and social services contracts. NALEO also propose that WAVs might be eligible for a fuel duty rebate, if used as a local bus service.

7.11 Of the operators, NPHA counsels against dictating actual dimensions and specification to manufacturers. NTA suggests that guidance should help influence behaviour. Both Allied Vehicles Ltd and LTI Vehicles consider that legislation would

be best to influence all three stakeholder groups. Allied Vehicles also suggests that the DfT should take steps to remove local barriers to entry to particular taxi markets.

Question 8. 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.

8.1 One-hundred-and-seven responses were received to this question (64.1% of the consultee total). The breakdown of respondents is shown in Table 12.

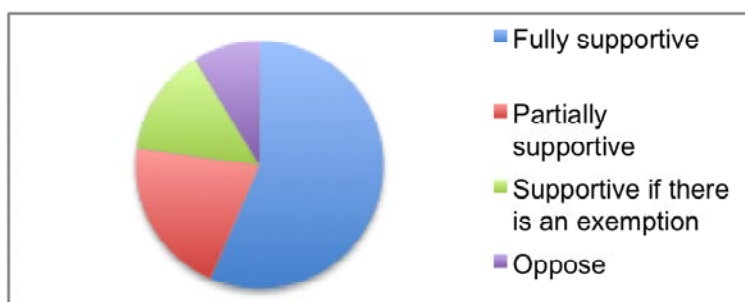
Table 12. Breakdown of respondents to Question 8

	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled groups or perspectives	21	19.6	47.7
Licensing Authorities or representative organisations	65	60.7	81.2
Vehicle manufacturers	3	2.8	100
Operators, drivers or operator organisations	16	48.5	48.5
Training organisations	1	0.9	100
Private individuals not identified elsewhere	1	0.9	50

8.2 Of the 107 respondents, **a clear view on the acceptability of the Government's proposal to amend and commence section 36 of the Disability Discrimination Act 1995** could be determined for 92 (86%). **Views divide into: fully support, partially support, support with caveats, and oppose.** These overall results are shown in Figure 7. Of these 92 respondents:

- Fifty-two respondents (56.5%) fully support the proposal;
- Nineteen (20.7%) partially support the proposal, or support it with caveats;
- Thirteen (14.1%) support the proposal provided there is a medical exemption available for drivers who are physically unable to fulfill the duty;
- Eight (8.7%) oppose the proposal, variously on the grounds that it would duplicate an existing legal requirement, would be heavy-handed, or would be discriminatory in relation to drivers of other transport modes.

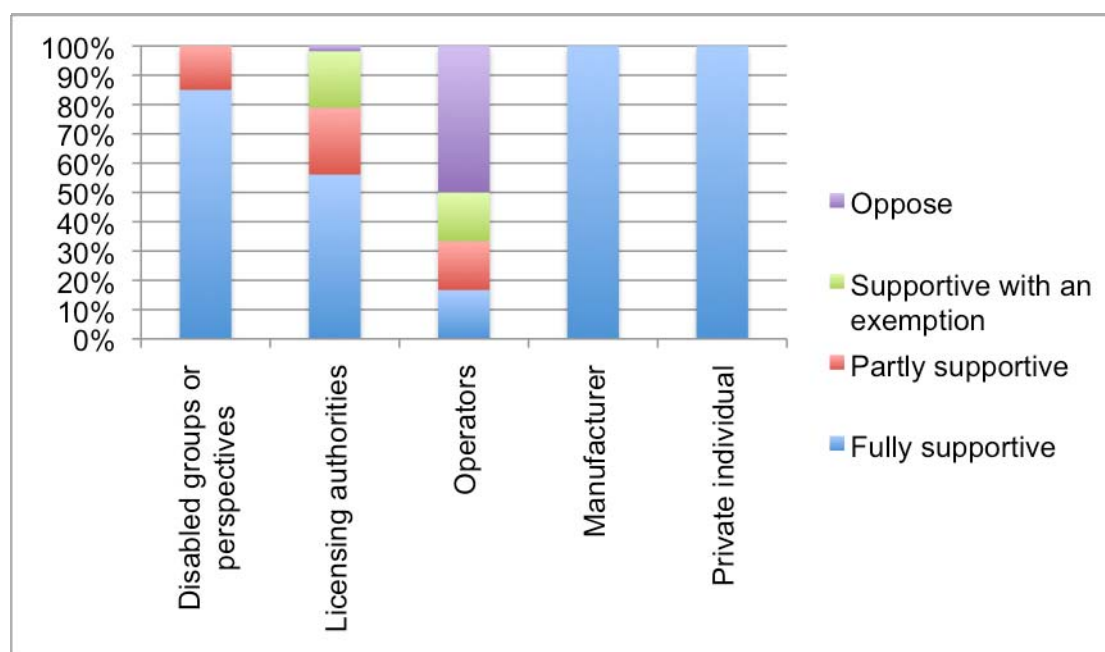
Figure 7. Overall views on the Government's proposal to amend and commence section 36 of the DDA 1995



8.3 These views can also be assessed by stakeholder group. These results are also shown in Figure 8.

- Among disabled representatives, 85% are fully supportive and 15% partly supportive or supportive with caveats;
- Among licensing authorities, 56.1% are fully supportive, 22.8% partly supportive or supportive with caveats, 19.3% supportive provided there is a medical exemption, and 1.8% against;
- Fifty per cent of operators oppose the proposal, with 16.7% each fully supportive, partly supportive and supportive provided there is a medical exemption;
- The only manufacturer to express a view is fully supportive;
- The only individual to express a clear view opposes the proposal.

Figure 8. Views of each stakeholder group on amending and commencing section 36 of the DDA 1995



8.4 Sixteen consultees (15% of respondents to Question 7; comprising three disabled organisations, 12 licensing authorities and one operator) **explicitly endorse the proposal to include PHVs** in the new requirement as a mitigation measure against migration from the Hackney carriage sector to PHVs. No consultee explicitly rejects this element of the proposal.

8.5 Respondents also raise a number of **other pertinent perspectives**. The key issues raised are as follows:

- (a) Twenty-two respondents (20.6%) stress the importance of disseminating information on and training drivers in the proposed new duties, several emphasising the importance of remedial training over penalties for those drivers found to be in non-compliance. Respondents comprised six disabled representatives including the key stakeholder DPTAC, ten licensing authorities, two operators including the key stakeholder NHPA, two manufacturers including the key stakeholder LTI Vehicles, and a single training organisation.
- (b) Seven respondents (one disabled representative, three licensing authorities, one training organisation and two operators) consider it important to take into account the health and safety implications for drivers in assisting wheelchair users.
- (c) Five respondents (four licensing authorities and one operator) agree that there should be no parking penalty to drivers who were loading or unloading a disabled passenger.
- (d) Reflecting on the proposal that drivers not charge disabled passengers extra for their carriage, four respondents (two licensing authorities and two operators) float the idea that drivers flagged down by a disabled person should be entitled to start the meter as they start loading the passenger, because of the extra time that this takes.
- (e) Two disabled representatives and one licensing authority express caution at the implementation of any medical exemption, fearing that it might be abused as a 'get-out clause'.
- (f) Two disabled representatives and one licensing authority argue for extending the duty to other disabled passengers, such as the deaf and blind.
- (g) Three licensing authorities express concern at the potential costs of the increased enforcement requirements that may flow from the proposed regulatory change.

8.6 Regarding **the views of key stakeholders**, DPTAC consider that the commencement of section 36 of the Disability Discrimination Act 1995 was long overdue, although noted that it was only a small minority of drivers who discriminated against disabled people. DPTAC stresses the importance of driver training in disability awareness. DPTAC would like to see licensing authorities given a comprehensive set of powers to discipline taxi drivers who discriminate against any disabled passengers, not just wheelchair users and guide dog owners.

8.7 NALEO believes that the proposed change to be logical, and consider that its extension to PHVs should reduce the chances of a wholesale migration to from Hackney carriages to PHV fleets. In the spirit of the Disability Discrimination Act 1995, NALEO suggests consideration be given to medical exemptions for existing drivers who themselves develop a disability so as to ensure that they themselves are not discriminated against.

8.8 NHPA is supportive of the proposal provided that adequate training (disability awareness, use of wheelchairs and WAV equipment) is introduced for drivers in advance of the new duties coming into effect. NHPA suggests that local authorities write to every licence holder to inform them of the new arrangements, require drivers to undergo relevant training, and permit exemptions on medical grounds. NTA does not oppose the change in principle, but perceives potential difficulties with its implementation. Allied Vehicles Ltd fears that the proposal would not, in itself, solve the primary problem of inadequate WAV provision. LTI Vehicles supports the proposal provided that drivers have received suitable training.

Question 9. What additional enforcement action or tools would be the most effective ways of improving driver behaviour and attitudes?

9.1 One-hundred-and-two responses were received to this question (61.8% of the consultee total). The breakdown of respondents is shown in Table 13.

Table 13. Breakdown of respondents to Question 9

	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled groups or perspectives	22	21.6	50
Licensing Authorities or representative organisations	62	60.8	77.5
Vehicle manufacturers	3	2.9	100
Operators, drivers or operator organisations	13	12.7	38.2
Training organisations	1	0.9	100
Private individuals not identified elsewhere	1	0.9	50

9.2 The large majority of respondents **suggest a combination of both enforcement actions and other tools**, implying that the two categories are not mutually exclusive.

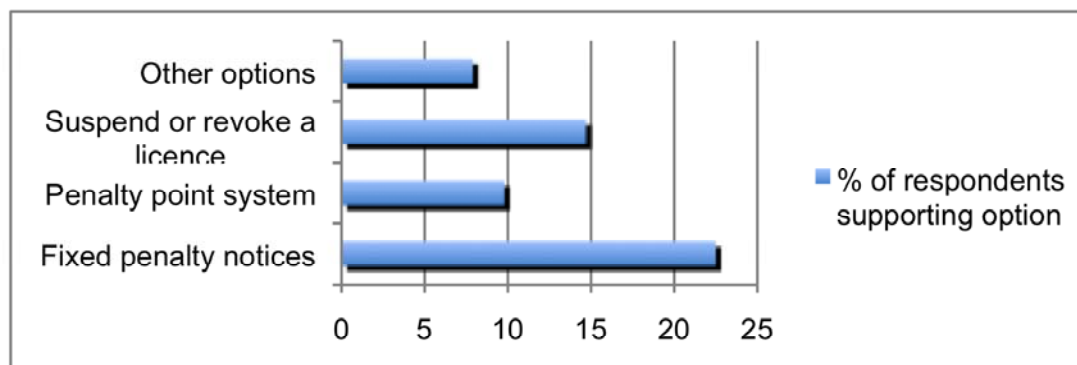
9.3 Respondents suggest a **number of possible enforcement actions** as presenting effective or potential effective ways of improving driver behaviour and attitudes. Responses are summarised in Figure 9. Most respondents suggest more than one option, suggesting that a combination of actions may be preferable. In rough order of descending support, the suggested actions comprise:

- (a) Providing further powers for enforcement officers to issue fixed penalty notices (proposed by 22.5% of those who addressed this question; comprising three disabled representatives, 18 licensing authorities including NALEO, a key stakeholder, two operators);
- (b) Developing a 'penalty point' system for licences, or incorporating disability issues into an existing system where one is present, culminating in the power to revoke a licence (9.8% of respondents; comprising two disabled representatives, including the key stakeholder DPTAC, and eight licensing authorities);
- (c) Simply suspending or revoking a licence for repeat offences where the driver is judged not to be a fit and proper person to hold a licence, i.e. without a formal penalty point system (14.7% of respondents; comprising four disabled representatives, eight licensing authorities including NALEO, two operators and one individual);
- (d) A staged approach that starts with an informal warning, then moves to either NVQ2 training or a fixed penalty notice, and culminates in prosecution for repeat offenders (2.9%; three licensing authorities);
- (e) Deployment of civil sanctions under the Regulatory Enforcement and Sanctions Act 2008 (2%; two licensing authorities);

(f) Fines for drivers found guilty of discrimination (2%; two disabled representatives); and

(g) Criminal conviction (1%; one licensing authority).

Figure 9. Consultee support for various enforcement actions



9.4 A large number of respondents **suggest the use of various tools** to address driver behaviour. By considerable margin (see Figure 10), **the most favoured tool is that of training**, with the argument that education is key to changing behaviour.

- The suggested training comprises attendance on a (low cost or free) disability awareness course that might be required as part of the conditions for new licensees (i.e. prevention is better than cure) and/or mandated following receipt of a complaint or offered as an alternative to enforcement (e.g. fixed penalty notice).
- In total, 59.8% of respondents explicitly support this option.
- Supporters comprise 13 disabled representatives including DPTAC, 35 licensing authorities including NALEO, nine operators including the key stakeholder NTA, three manufacturers including the key stakeholders Allied Vehicles Ltd and LTI Vehicles, and one training organisation.
- DPTAC suggest that the training might be certified by the Driving Standards Agency, but delivered by a suitable external training provider. The training organisation notes that the new NVQ in Road passenger vehicle driving includes a mandatory unit that covers assisting passengers with disabilities.

9.5 **A variety of other tools** are suggested, but all garner sufficiently less support than the idea of training (see Figure 10). In descending order of support levels, the options comprise:

(a) providing clear guidance to drivers on what their duties entail, what is outside scope, and what rights they have to refuse to carry a wheelchair passenger (4.9%; four operators including two key stakeholders, NTA and NPHA, and one manufacturer, LTI);

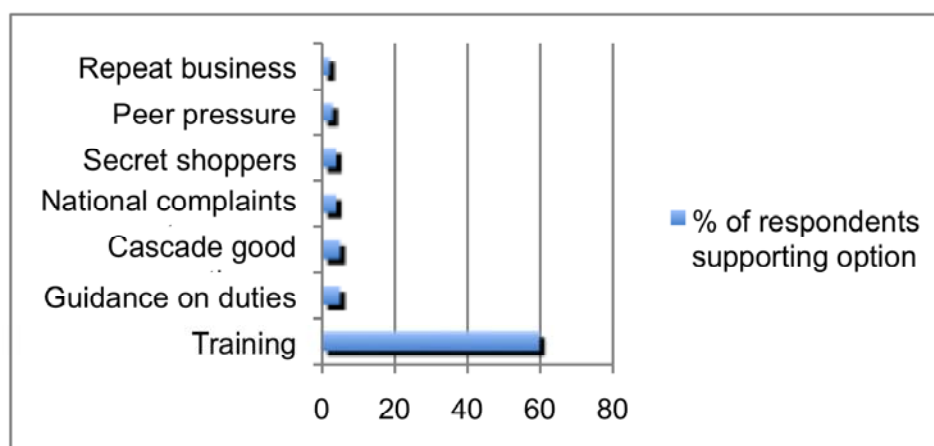
(b) cascading good practice (4.9%; DPTAC, three licensing authorities and one operator);

(c) introducing a standardised complaints system at a national level (suggested by 3.9% of respondents; single disabled representative and operator, and two licensing authorities);

(d) using 'secret shoppers' to assess driver practice (3.9%; one disabled representative and three licensing authorities);

- (e) introducing a system of peer pressure and review with key stakeholders working together to weed out poor performance (2.9%; one disabled representative and two licensing authorities); and
- (f) communicating the link between improved customer service and increases in repeat business (2%; single disabled representative and training organisation).

Figure 10. Support for various tools to address driver behaviour



9.6 Respondents raise a couple of **further issues – examples of things not to do**. These are as follows:

- (a) DfT should instruct parking enforcement authorities not give taxi drivers penalty notices if they are loading/unloading disabled passengers (eight licensing authorities including NALEO, and one operator);
- (b) Three licensing authorities caution that successful prosecution is difficult, as it is often one set of verbal evidence against another; and
- (c) Prosecution would be excessive (two licensing authorities and one operator).

9.7 In terms of **key stakeholders**, DPTAC favours introducing a compulsory disability awareness training programme as an integral part of the driver licensing procedure. This mandatory training might be certificated by the DSA, but delivered by a suitable external training provider. DPTAC offers their training framework as guiding principles. DPTAC suggests that driving disqualification sanctions, through a 'totting up' process, might be an appropriate sanction. DPTAC also suggests that licensing authorities might be encouraged to provide guidance and cascade good practice. DPTAC argues that research should be carried out into the effective enforcement of the existing regulations and into the number of exemptions sought under them.

9.8 NALEO suggests that WAV drivers under a duty to carry wheelchair users should not generally be liable to a penalty for stopping and taking the time to assist in loading/ unloading such a passenger. NALEO also advocates that offending WAV drivers should have the options of either a fixed penalty notice or an NVQ2 training course instead of prosecution. NALEO argues that repeat offenders not in possession of a medical exemption should be barred from WAV employment.

9.9 Among operators, NPHA suggests that licensing authorities and drivers alike need guidance as to the rights of the driver to refuse to carry a wheelchair passenger. NTA does not believe that further enforcement action is necessary,

arguing instead that guidance and training are more suitable ways forward. Of the manufacturers, Allied Vehicles Ltd and LTI Vehicles both advocate mandatory disability awareness training. LTI suggests further guidance to be provided on what constitutes 'reasonable' behaviour for a driver when unloading wheelchairs.

Question 10. What measures do you think could act as positive incentives to improve driver behaviour and the levels of service offered to disabled people?

10.1 One-hundred-and-five responses were received to this question (62.9% of the consultee total). The breakdown of respondents is shown in Table 13.

Table 13. Breakdown of respondents to Question 10

	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled group or perspective	22	21.0	50
Licensing Authorities or representative organisations	65	61.8	81.2
Vehicle manufacturers	3	2.8	100
Operators, drivers or operator organisations	13	12.4	38.2
Training organisations	1	1.0	100
Private individuals not identified elsewhere	1	1.0	50

10.2 There appears to be **considerable overlap in** consultees' responses to Question 10 and their answers to Questions 7 and 9. Several suggestions given in response to those two questions are reiterated here and are summarised in paragraph 10.4.

10.3 However, there are several **wholly or largely new suggestions**, usually given in combination with other proposals. These new suggestions (summarised in Figure 11) are covered in this paragraph, and are treated in order of descending support:

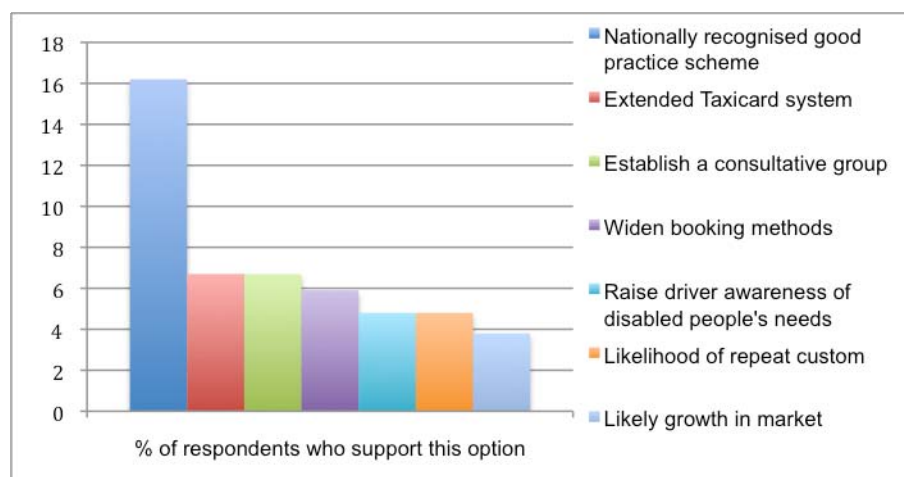
(a) Develop a **nationally recognised good practice scheme** which attributes 'considerate driver' status to trained drivers offering good customer service to disabled passengers. The scheme might be recognised by a kite mark that is quality assured and monitored by a trusted and independent agency to secure its ongoing value.

- This option is favoured by 16.2% of those who address Question 10 (six disabled representatives, nine licensing authorities, a single manufacturer and training organisation).
- One consultee moots that such as scheme might be based on nomination and voting by disabled representatives.
- GoSkills, a training organisation, notes that it is planning to discuss such an option with the taxi industry.

(b) Encourage disabled people to use taxis by **extending the Taxicard system** in operation in certain cities, but restrict access to the 'Taxicard market' to those taxi drivers who have undertaken disability awareness training.

- This option is supported by 6.7% of respondents to Question 10, comprising two disabled representatives, one licensing authority, two operators (including NPHA, a key stakeholder) and two manufacturers (including LTI Vehicles, a key stakeholder).
- (c) **Establish a consultative group** that meets regularly to discuss issues of concern to the industry (supported by 6.7% of respondents, including five licensing authorities and two operators, including NPHA).
- (d) Six respondents (5.9%; one disabled representative and five licensing authorities) consider how **operators might be able to improve their service levels**. Taxi operators should consider accepting bookings in a variety of different ways to assist, for example, deaf and blind users, e.g. by text message, the internet or Type talk.
- Two consultees suggested that operators be encouraged to apply for special grants or interest-free loans to explore these new technological opportunities.
- (e) **Educate drivers in the lifestyle and needs of disabled people**, to increase their empathy and understanding, and to remove the frequent misunderstandings. The aim would be to make drivers aware of the problems faced by disabled people and how the availability of transport is essential to their quality of life.
- Involving disabled people in such education activities would provide a space for dismantling barriers and constructive engagement.
 - This broad option is proposed by 4.8% of respondents, comprising five licensing authorities and one operator).
- (f) Raise taxi drivers' perception that **repeat custom is likely** for drivers who are considerate towards disabled passengers (4.8%; two disabled representatives and three licensing authorities) **and stress the likely growth in the market** as the number of disabled people rises (3.8%; two each of disabled representatives and licensing authorities).
- (g) Work with the insurance trade to **offer lower insurance premiums** as incentives for suitably trained drivers (once licensing authority).
- (h) NALEO suggests that there is a role for DfT to change the public perception of taxi drivers, by using LTP3 to insist on the integral role of taxis within the public transport system.

Figure 11. New suggestions made by respondents for positive behaviour to improve driver behaviour and service levels



10.4 A large number of respondents **reiterate suggestions made in responses to Questions 7 and 9**. Given that these proposals are analysed quantitatively in the corresponding sections, we simply repeat the list of suggestions here without giving an indication of how many consultees reiterated their support:

- mandatory training, but with the slant being to create a positive image of drivers among disabled users and to give drivers self-confidence in how to behave appropriately;
- restrict access to public service contracts to drivers who have undertaken disability awareness training;
- encourage peer pressure among the taxi industry; and
- introduce financial incentives for WAV drivers who have taken relevant training, such as reduced Vehicle Excise Duty, subsidies and zero VAT for WAV purchase, reduced licence fees, reduced road tax and a fuel duty rebate.

10.5 In terms of **key stakeholders**, DPTAC agrees with DfT that there needs to be incentives to encourage good practice and suggest that these recognise taxi drivers who provide good customer care. DPTAC reiterates that compulsory disability awareness training would be a positive motivator for driver behaviour. DPTAC suggests incentivising action by reducing licence costs or reducing vehicle tax. DPTAC also moots some sort of driver charter mark, which would encourage the public to book or flag down taxis that display the mark.

10.6 NALEO believes that a structured process of educating service providers and users will reap great benefits. NALEO also proposes restricting access to certain contracts to qualified drivers, and offering duty rebates to trained drivers. NALEO suggests that there is a role for DfT to change the public perception of taxi drivers, by using LTP3 to insist on the integral role of taxis within the public transport system. NALEO laments that, at present, the public tends to regard drivers as a transient unskilled workforce rather than qualified professionals.

10.7 NPHA suggests incentivising operators through preferential access to hospital and school contracts and taxi-card schemes. NPHA also suggests promoting a more constructive engagement between community transport users and the taxi trade. NTA sees no evidence that there is any need to improve driver behaviour.

10.8 Allied Vehicles Ltd proposes disability awareness training that is reinforced by recognition and reward schemes, perhaps based on nomination and voting by disabled people and their representative organisations. Allied Vehicles also suggests encouraging disabled people to use taxis (e.g. through a Taxicard scheme). LTI Vehicles similarly favours inducements for disabled people to use WAVs, and draws attention to the success of two local Taxicard schemes.

Question 11. In relation to improving access to taxis, what do you think the DfT and local licensing authorities could do better or more effectively?

11.1 Ninety-three responses were received to this question (55.7% of the consultee total). The breakdown of respondents is shown in Table 14.

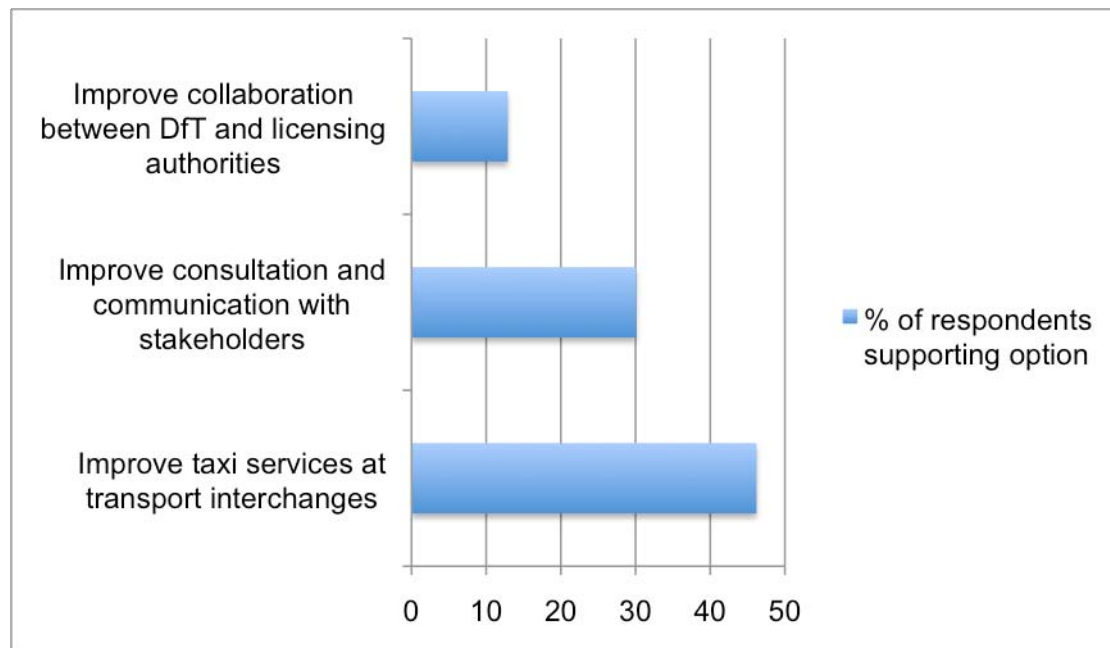
Table 14. Breakdown of respondents to Question 11

	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled group or perspective (D)	17	18.3	38.6
Licensing Authorities or representative organisations (LA)	58	62.4	72.5
Vehicle manufacturers (M)	3	3.2	100
Operators, drivers or operator organisations (O)	14	15.0	44.1
Private individuals not identified elsewhere (I)	1	1.1	50

11.2 Almost all stakeholder suggestions relate to three broad issues:

- improving taxi services at transport interchanges (raised by 46.2% of respondents to Question 11);
- improving consultation and communication with stakeholders (30.1%); and
- improving collaboration between DfT and licensing authorities (12.9%).

Figure 12. Headline recommendations for what DfT and local authorities could do to improve access to taxis



11.3 Forty-three respondents advocate **improving taxi services at transport interchanges**, an issue on which views are explicitly sought in Question 12 (so see paragraphs 12.3–12.6 for further details). Respondents making this suggestion comprise a notably high proportion of disabled representatives (94% of this stakeholder group that responded to Question 11) as well as 24 licensing authorities (41.3%, including the key stakeholder NALEO) and three operators (23%). A number of specific suggestions are made (summarised in Figure 13):

(a) More careful positioning of taxi ranks is suggested by six respondents (14.0% of those who favour the broad option of improving taxi services at transport interchanges; three each of disabled representatives and licensing authorities).

(b) DfT should provide clear guidance or technical criteria for taxi rank design according to 13 respondents (25% who favour the broad option of improving taxi services at transport interchanges; comprising four disabled representatives and nine licensing authorities).

(c) Respondents identify specific elements of taxi rank design that such guidance or criteria might address. These comprise:

- kerb heights (13 respondents, equating to 25% of those who favour the broad option of improving taxi services at transport interchanges; comprising four disabled representatives, six licensing authorities and three operators);
- provision of sheltered seating near the rank (eight representatives or 18.6% who favour the broad option; comprising four disabled representatives and two each of licensing authorities and operators);
- pavement width (five respondents; one disabled representative and two each of licensing authorities and operators);
- wheelchair ramps (two operators);
- guide rails (two licensing authorities);
- ensuring that taxis are accessible from the near side (two disabled representatives and one licensing authority);
- improving security at night (singled disabled representative and licensing authority); and
- sufficient room for taxis to drop their ramps (one disabled representative).

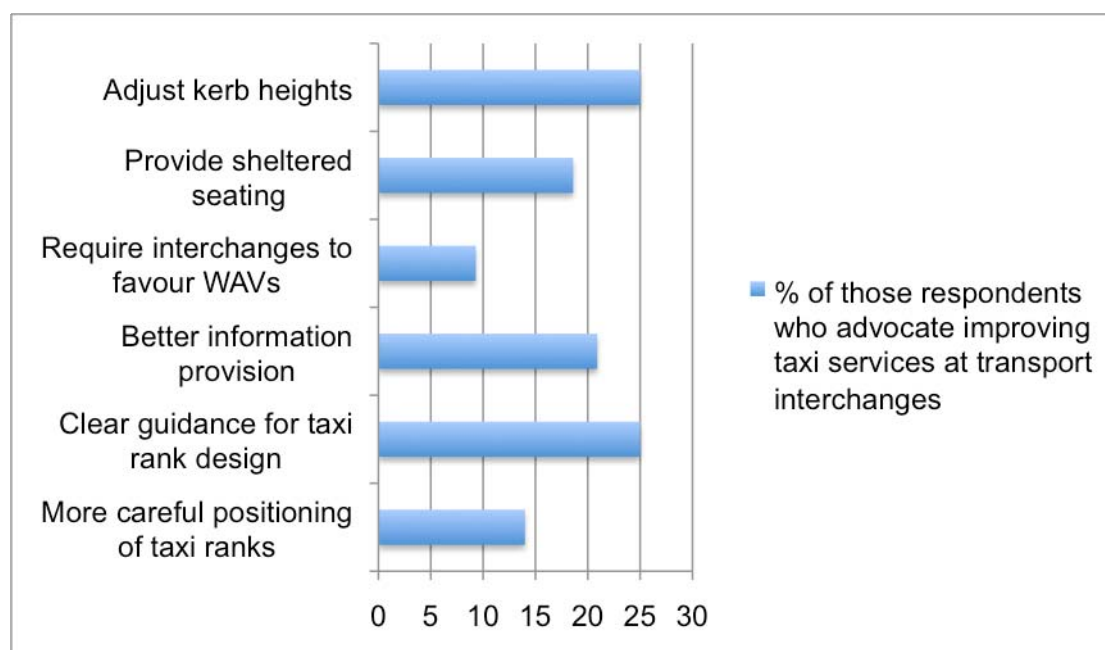
(d) Better information provision at interchanges, for example relating to taxi availability and the whereabouts of wheelchair-accessible ranks.

- This is favoured by nine respondents (20.9% of those who favour the broad option) comprising three disabled representatives, four licensing authorities and two operators. Respondents treat this issue in greater detail in their response to Question 12.

(e) Require interchange operating companies to favour WAVs at taxi ranks, seeking to create greater consistency about WAV provision (favoured by 9.3% of those who endorse this broad option; four licensing authorities including NALEO).

- One suggestion is that franchise agreements under section 33 of the DDA 1995 could be implemented to enforce interchange operator contracts. Respondents treat this issue in greater detail in their responses to Question 12.

Figure 13. Level of support for various ways to improve taxi services at transport interchanges



11.4 Twenty-eight respondents suggest that DfT at a national level and/or licensing authorities at a local level should **work to improve consultation and communication with stakeholders**. Advocates comprise six disabled representatives, including DPTAC; 16 licensing authorities, including NALEO; and six operators, including the key stakeholders NPHA and NTA. Specific suggestions include:

- giving disabled users a greater say in service policy design, to enable better informed decisions and to give disabled people more of a stake in those decisions;
- developing a closer working relationship between providers of all components of transport infrastructure;
- licensing authorities to improve their collaboration with industry representatives to formulate good practice and create an effective feedback loop.

11.5 Twelve respondents (12.9% of those who address Question 11) argue broadly in favour of **improving collaboration between DfT and licensing authorities**. These comprise four disabled representatives, including the key stakeholder DPTAC, and eight licensing authorities, including the key stakeholder NALEO. Specific suggestions include the following:

- (a) There is a need to improve the consistency of service provision between Local Authority areas, to give disabled users certainty about journeys to areas where they are not resident (five respondents, comprising two disabled representatives and three licensing authorities, including NALEO).
- (b) DfT to provide guidance to Local Authorities transport or highways officers, because they (rather than taxi licensing authorities) are responsible for taxi rank designation as part of local transport planning. This should promote greater internal coordination within Local Authorities. (Suggestion made by four licensing authorities.)

(c) Taxis should be further enshrined in integrated transport strategies (proposed by one disabled representative and two licensing authorities).

(d) DfT and LACORS might collaborate on providing guidance to licensing authorities. (Suggestion by one licensing authority.)

(e) Regulatory and monitoring systems should be improved at a local level, and complemented by national policy of effective enforcement (the view of DPTAC).

11.6 Three manufacturers, including the key stakeholders LTI Vehicles Ltd and Allied Vehicles Ltd, as well as NALEO, do not advocate any of the broad approaches suggested above. Instead, they **argue that only regulations will produce the necessary change**.

11.7 As for **key stakeholders**, DPTAC argues for introducing a better regulation and monitoring system at licensing authority level, underpinned by a national policy of enforcement with effective enforcement powers. DPTAC suggests that DfT might encourage local authorities to take a standard approach with regards a mixed fleet. DPTAC also suggest that DfT should consider how best to prevent licensed taxis moving over to private hire. To address the issue of inconsistency across the country, NALEO suggests that DfT and Local Authorities should work together to improve best practice guidance, which might be transferred into a statutory Code of Practice or even regulations set down under a Statutory Instrument. NALEO suggests that there should be a cross-sectoral stakeholder working party to develop such instruments.

11.8 Among the operators, NPHA argues for Local Authorities and the disabled to work together to identify and address their needs in Local Transport Plans. NTA proposes that a combination of guidance and financial incentive to the industry would be the most appropriate way forward. Of the manufacturers, both Allied Vehicles Ltd and LTI Vehicles argue that Government should make nationally enforceable regulations. Allied Vehicles suggests that licensing authorities and the DfT should encourage diversity within taxi fleets.

Question 12. How could we help to increase the availability of accessible taxis and private hire vehicles at ports, airports, bus and rail stations?

12.1 Ninety-four responses were received to this question (56.3% of the consultee total). The breakdown of respondents is shown in Table 15.

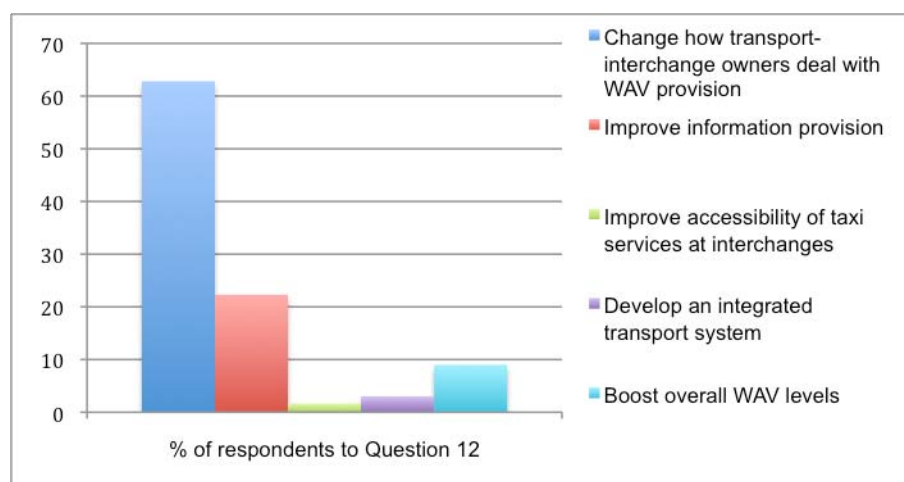
Table 15. Breakdown of respondents to Question 12

	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled groups or perspectives	20	21.3	45.5
Licensing Authorities or representative organisations	59	62.8	73.7
Vehicle manufacturers	3	3.2	100
Operators, drivers or operator organisations	13	13.8	38.2
Training organisation	1	1.1	100
Private individuals	1	1.1	50

12.2 Stakeholder suggestions relate to five broad issues (summarised in Figure 15):

- changing the way in which owners of transport interchanges deal with WAV provision (62.8% of respondents to Question 12);
- improving the provision of information about WAV services at transport interchanges and/or on the internet (22.3%);
- improving the accessibility of taxi services at transport interchanges (11.7%);
- developing a truly integrated transport system (5.3%); and
- boosting overall levels of WAV provision through regulation or financial incentive (13.9%).

Figure 15. Areas to address to increase the availability of accessible taxis and PHVs at transport interchanges



12.3 Respondents acknowledge that **transport interchanges** are privately owned, which makes it problematic (or even impossible) for Government to influence them. Respondents also acknowledge that ranks at transport interchanges are prime sites for business, and thus that interchange-owners are permitted to charge for access to them.

12.4 Nevertheless 41 respondents (43.6% of those who address Question 12) **identify specific improvements that interchange-owners should make**. This subgroup comprises 11 disabled representatives, 19 licensing authorities, two manufacturers and five operators. The improvements suggested are that interchange-owners might:

(a) waive rank fees for WAVs, allow them to visit ranks whether or not they have won a franchise, or prioritise operators with a WAV fleet. This broad group of proposals has support from 17 respondents (18.1%). These comprise three disabled representatives, including DPTAC; nine licensing authorities; four operators and a single manufacturer, the key stakeholder LTI Vehicles;

(b) ringfence a minimum percentage of WAV-only spaces in taxi ranks. This option is favoured by 10 respondents (10.6% of those who address Question 12), comprising two disabled representatives including DPTAC, six licensing authorities and two operators;

(c) require all taxis at such transport interchanges to be WAVs (ten respondents or 10.6%, comprising a single disabled representative and manufacturer, plus eight licensing authorities, including the key stakeholder NALEO);

(d) require all transport interchanges to have accessible taxi ranks that are located conveniently for disabled passengers (five disabled representatives, including DPTAC, two licensing authorities and one manufacturer);

(e) discriminate positively in favour of WAV-operators in deciding who has access to interchanges (two supporters) or restrict access to such prime spots to drivers who have conducted disability training (one respondent).

12.5 Fifteen consultees (16.0% of those who address Question 12) **suggest how this might be achieved**. They comprise four disabled representatives including DPTAC, ten licensing authorities and one operator. This group is split into two camps, of whom **40% think guidance will be sufficient, whereas 60% suspect that legislation may be required**.

- Six respondents (three each of disabled representatives and licensing authorities) suggest that the DfT provide guidance on franchising for interchange-owners, work with them to build improved accessibility into their franchise agreements.
- Nine respondents (one disabled representative, eight licensing authorities and one operator, the key stakeholder NPHA) would prefer guidance but fear that it may be insufficient to change policy of interchange-owners and thus suggest that legislation may be necessary. NPHA floats the idea that section 36 of DDA 1995 might be amended to require operators that win contracts to service transport termini to demonstrate that they have sufficient WAVs to meet demand.

12.6 Twenty-one respondents consider there to be a **need for improvement in information provision, including making it easier to secure an accessible taxi**. These respondents comprise seven disabled representatives, 13 licensing authorities and one operator. They suggest two broad ideas:

(a) making public information, for example through Local Authority and transport interchange websites, on WAV availability and other accessibility provisions at interchanges so that disabled passengers may plan their journey.

- This might, for example, give contact details for the taxi operators using the interchange ranks that have WAVs.
- This suggestion was made by 12 stakeholders, comprising one disabled representative, ten licensing authorities including NALEO and one operator.

(b) improving real-time information dissemination and WAV booking points at transport interchanges, accessible to all types of disability.

- Supporters comprise 16 respondents, specifically six disabled representatives including DPTAC, nine licensing authorities, including NALEO, and one operator.

12.7 Ten respondents (10.6% of those who addressed Question 12) propose (generically) **improving the accessibility of taxi pick-up points at transport interchanges**. Respondents comprise four disabled representatives including the key stakeholder DPTAC, four licensing authorities, a single manufacturer and operator.

- Additionally, one manufacturer (the key stakeholder Allied Vehicles) suggests that major transport termini should be brought under the provisions of the DDA 1995, and that accessibility standards should be applied to them.

- In response to Question 12, only one respondent makes specific proposals as to what these improvements might be (wheelchair ramps and sheltered seating).
- However, in their responses to Question 11, a further 16 respondents suggest detailed changes to the physical layout and features of transport interchanges. These comprise six disabled representatives, seven licensing authorities and three operators; details of their proposals are covered in paragraph 11.3(c).

12.8 Five respondents (one disabled representative, three licensing authority and one training organisation) argue that the issue should be approached by **developing a truly integrated transport system**, where all providers of transport components (e.g. within a Local Authority) work together. Two stakeholders suggest that transport operators should be encouraged to view in an integrated way rather than as mode-specific journeys.

12.9 Thirteen respondents favour **solutions designed to increase overall levels of WAV provision**, namely regulation (e.g. requiring all taxis to be WAVs) and financial incentives (suggestions for which are summarised in paragraph 7.5[a]). In the context of Question 12, regulation is favoured by six licensing authorities and financial incentives favoured by seven respondents (five licensing authorities and single disabled representative and operator).

12.10 Among **key stakeholders**, DPTAC argues for reviewing the franchising of taxis at transport interchanges. DPTAC believes that current policy is jeopardising disabled people's access to seamless and integrated transport because most of the companies with a franchise have too few and limited accessible taxis. Specifically, DPTAC suggests introducing a minimum WAV quota for operators at interchanges and an 'accessible taxi call point' at interchanges, where passengers may call the local taxi firm and ask for an accessible taxi. DPTAC floats the idea of an advance booking facility via the DirectGov website, that might be linked to taxi card schemes. DPTAC suggests that interchanges might provide a safe space for taxis to load/unload disabled passengers. DPTAC also argues for making designated accessible taxi pickup and drop-off infrastructure points more accessible.

12.11 NALEO suggests that the DfT might require Local Authorities to use their websites to show contact details for taxi operators, and differentiate between those with and those without WAVs. Like DPTAC, NALEO moots the possibility of automated information points close to transport interchanges where bookings could be facilitated. NALEO fears that legislation may be needed to insure that transport interchange-owners address the needs of disabled users.

12.12 Of the two operators, NPHA laments the current restrictions on operators at transport interchanges, and proposes amending primary legislation to require interchange-owners to ensure that WAVs are always available, and to ensure that ranks are accessible to disabled people. One idea would be that operators wishing to pick up from interchanges be required to demonstrate that they have sufficient WAVs in their fleet. NTA supports the need for an adequate supply of WAVs at transport interchanges but has not seen evidence that these vehicles are unavailable.

12.13 Among the manufacturers, Allied Vehicles Ltd argues that major transport termini should be designated under the provisions of the DDA 1995 and that accessibility standards be applied to them. LTI Vehicles suggests that each transport interchange have accessible taxi ranks that are conveniently located. LTI fears that

legislation may be required for transport interchange-owners to amend current practices.

Question 13. How could we improve the consistency and quality of information provided to disabled people about taxis?

13.1 Ninety-one responses were received to this question (56% of the consultee total). The breakdown of respondents is shown in Table 16.

Table 16. Breakdown of respondents to Question 13

	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled groups or perspectives	20	22.0	45.5
Licensing Authorities or representative organisations	56	61.5	70
Vehicle manufacturers	3	3.3	100
Operators, drivers or operator organisations	10	11.0	29.4
Training organisation	1	1.1	100
Private individuals not identified elsewhere	1	1.1	50

13.2 The issues and suggestions raised by respondents fall into four broad areas: (a) whether information provision should be national, local or a mixture (an issue addressed by 52.7% of those who addressed Question 13); (b) options for the media in which information might be disseminated, e.g. hard copy, electronic or audiovisual (31.9%); (c) the use of existing vehicles to communicate information (16.5%); and (d) the use of the transport industry and infrastructure, and other public places to share information (15.4%).

13.3 Forty-eight respondents (52.7% of those who address Question 13) offer advice as to **whether information provision** (in whatever form) **should be national** (e.g. should emanate from DfT) **or local** (e.g. should emanate from Local Authorities). Views are mixed and the split is shown in Figure 16. Broadly:

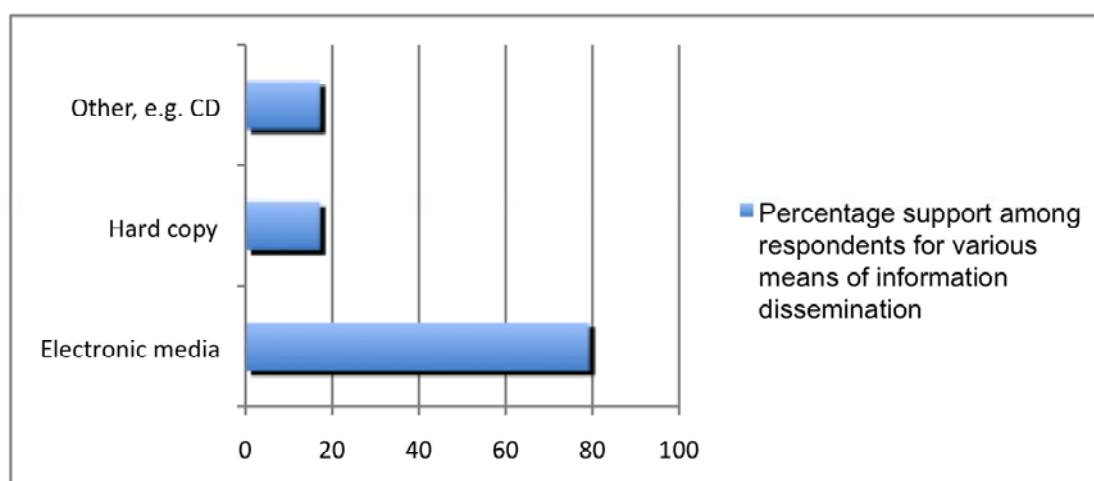
- 39.6% of the 48 respondents favour national processes;
- 33.3% favour local processes; and
- 27.1% suggest a halfway house whereby national-led processes are delivered with a local flavour.

Figure 16. Stakeholder views on whether information provision should be conducted nationally, locally or with elements of both



- 13.4 These broad responses can be analysed by stakeholder group.
- disabled representatives display a preference for information being provided at the national level (58.3%);
 - operators prefer the local level (100% of the two respondents); and
 - licensing authorities are evenly split (almost exactly one-third for each of the three options).
- 13.5 Of the 19 respondents favouring **the national approach**, 68% (13 respondents, comprising four disabled representatives, including the key stakeholder DPTAC, and nine licensing authorities) suggest a single standard source of national DfT guidance to disabled users and groups, preferably produced by a stakeholder working group. Two less popular options are also suggested:
- a national advertising campaign targeted at the elderly and disabled to raise awareness of WAVs (suggested by two licensing authorities); and
 - a national taxi information telephone and/or textline or publicly accessible database of WAV drivers, held on the DirectGov website (favoured by three disabled representatives, including the key stakeholder DPTAC, and one operator).
- 13.6 Sixteen respondents (comprising four disabled representatives, 10 licensing authorities, two operators and one manufacturer, the key stakeholder Allied Vehicles Ltd) prefer to **keep information provision at a local level**. They argue that local needs differ and thus national information is unlikely to be consistent and accurate across every area. A subset of 13 respondents (comprising three disabled representatives, eight licensing authorities and two operators) proposing sharing information through local or regional groups (such as disability groups or local access groups) and asking them to share with their members.
- 13.7 Just over one-quarter of respondents (comprising two disabled representatives and 11 licensing authorities) propose what might be termed a **'halfway house'**. DfT might provide Local Authorities with national guidance regarding information provision, designed in conjunction with user representatives, that sets out the type and format of information to be provided, and in what media. This would make it easier for disabled to know what to expect, but still enable material to be tailored to local circumstances.
- 13.8 Twenty-nine respondents (31.9%) suggest one or more **options for the media in which information might be disseminated, e.g. hard copy, electronic or audiovisual**. Respondents comprise four disabled representatives including DPTAC, 22 licensing authorities, two operators including the key stakeholder NPHA and one manufacturer. These responses are illustrated in Figure 17.
- There is a clear preference for electronic media (23 respondents or 79.3%) with just five respondents (17.2%) favouring hard copy.
 - Five respondents (17.2%) suggest that the means should be appropriate for a range of disabilities, e.g. CD and DVD for the deaf; large print or Braille for the blind.
 - Analysed by stakeholder group, 91% of licensing authorities propose electronic media, but other groups are more evenly split.

Figure 17. Consultee views on the appropriate medium for information dissemination



13.9 Considering the **means through which information may be disseminated**, 15 respondents (16.5% of respondents to Question 13, comprising three disabled representatives, eight licensing authorities, two operators including the key stakeholder NPHA and two manufacturers including the key stakeholder LTI Vehicles) **suggest using existing vehicles where these are available**. Five options are proposed, listed here in order of descending support:

- make marketing use of Local Authority databases, e.g. Dial-a-Ride, Taxicard users, Council tax (seven supporters, comprising one disabled representative, two licensing authorities, two operators including NPHA and two manufacturers including LTI Vehicles);
- feeding information through local disability groups (two disabled representatives and four licensing authorities);
- user or trade magazines (suggested by two licensing authorities and one manufacturer);
- improved use of Local Authority communication tools. e.g. website or customer service point (single disabled representative and licensing authority); and
- adding taxis as a transport mode to web-based journey-planner sites (single licensing authority).

13.10 Fourteen respondents (15.4% of those addressing Question 13) suggest options relating to the **use of the transport industry and infrastructure**, and other public places, to share information. These respondents comprise four disabled representatives including DPTAC, six licensing authorities and three operators including the key stakeholder NTA. Respondents suggest three broad options:

- provide automated information points at strategic locations which might include buildings regularly visited by disabled people, e.g. hospitals, day centres, nursing homes, churches, travel agents and libraries (proposed by two disabled representatives including DPTAC, four licensing authorities, and two operators including NTA);
- provide accessible information on local WAV provision, with contact details, at transport interchanges and on their websites (supported by three disabled representatives, two licensing authorities and two operators; see also paragraph 12.6); and

- require WAV operators to provide information relating to journey time, cost and accessibility issues at destination (suggested by two licensing authorities).

13.11 Other points made by respondents include a call for DfT to centrally fund suitable LA initiatives (proposed by three licensing authorities) and the trialing of information scheme pilots prior to reaching a final decision on the best way forward (proposed by three licensing authorities, including the key stakeholder NALEO).

13.12 Regarding **key stakeholders**, DPTAC argues that a national WAV standard would enable the disabled community to book taxis without worry. DPTAC suggests that the Driving Standards Agency establish a national database of suitable drivers and operators and information, access to which might be provided through the DirectGov website. DPTAC suggests that information relevant to disabled people also needs to be distributed to Local Authorities and then to reach those that need accessible taxis such as nursing homes.

13.13 NALEO suggests that DfT might require Local Authorities to give contact details for operators on their website, indicating the respective level of WAV provision. NALEO suggests that DfT should provide specific guidance as to what information should be provided and in which formats. A pilot scheme might be useful.

13.14 Of the two operators, NPHA suggests that Local Authorities send out newsletters with pertinent information to those on their register of disabled people. NTA proposes provision of information at locations regularly attended by disabled people, such as hospitals, day centres etc.

13.15 Of the two manufacturers, Allied Vehicles Ltd argues that local information is essential, and thus licensing authorities should be tasked to communicate effectively with local disabled representatives. LTI Vehicles suggests that the introduction of Taxicard schemes would provide Local Authorities with a marketing list for those who would benefit from WAV-related information.

Question 14. What do you think are the potential impacts, costs and benefits of a proactive programme of DfT-led initiatives?

14.1 Sixty-seven responses were received to this question (40% of the consultee total). The breakdown of respondents is shown in Table 17.

Table 17. Breakdown of respondents to Question 14

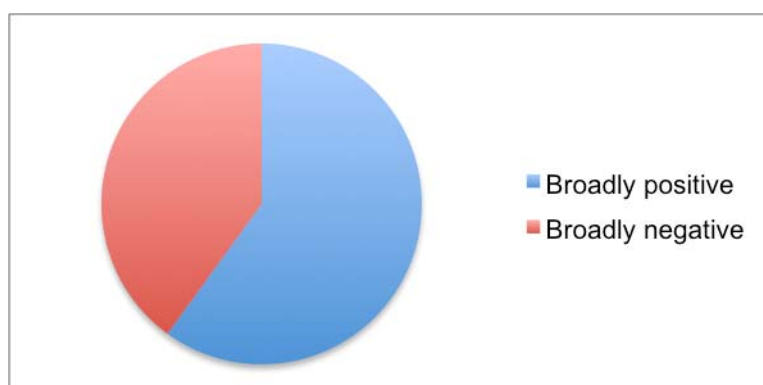
	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled groups or perspectives	13	19.4	29.5
Licensing Authorities or representative organisations	45	67.2	56
Vehicle manufacturers	3	3.0	100
Operators, drivers or operator organisations	7	10.4	20.6

14.2 Question 14 provoked some confusion among respondents, with 18 consultees (26.9% of those who addressed the question) suggesting that the question was too wide-ranging and the information provided on the proposed package of initiatives inadequate for them to be able to respond properly. This group of consultees included 15 licensing authorities, one-third of those licensing authorities that addressed Question 14). Of the 49 consultees who feel able to respond substantively, a number of replies were tentative, again probably reflecting the uncertainty surrounding the proposal.

14.3 Although Question 14 asks only for views on the impacts, costs and benefits of the proposed package of initiatives, 20 respondents (29.9% of the 67 who addressed Question 14; six disabled representatives, eight licensing authorities, three manufacturers and two operators) **give explicit opinions on the overall suitability of the concept. Forty per cent were positive** or broadly so about the idea, but **60% were broadly negative** (Figure 18). Specifically:

- five respondents feel the 'initiatives approach' is likely to be beneficial and to lead to positive outcomes (one disabled representative and four licensing authorities);
- one disabled representative and one licensing authority are not optimistic about the likely benefits, but still broadly positive;
- one manufacturer, the key stakeholder Allied Vehicles, considers the approach to probably be helpful if undertaken in a cost effective manner and in support of regulations, not mere guidance;
- seven respondents (three disabled representatives and four licensing authorities) considered the 'initiatives approach' to be insufficient on its own, but feasible as a complement the (essential) regulatory approach;
- five respondents (one disabled representative, two operators and two manufacturers, including the key stakeholder LTI vehicles) see no benefit in the option; and
- among stakeholder groups, there are few clear patterns given the small sample size but two-thirds of disabled representatives and manufacturers are broadly negative.

Figure 18. Broad views on desirability of a proactive programme of DfT-led initiatives



14.4 Ten respondents (14.9% of those who address Question 14; comprising four disabled representatives, four licensing authorities, one operator and two manufacturers, including the key stakeholder LTI Vehicles) **offer views on the impacts of the 'initiatives approach'**. Several respondents identify more than one impact, but no impact garners more than four supporters, so a detailed breakdown is not given for each of the (largely negative) suggestions made, which are as follows:

- would be insufficient to ensure that disabled people will have equal access to taxis across the country;
- will discourage Local Authorities, especially in rural areas, from changing their fleets to WAVs;
- without extending the approach to PHVs, may result in widespread migration of Hackney drivers to that sector;
- will result in decreased WAV levels;
- will not deliver the objectives of the DDA 1995; and
- will perpetuate inconsistency across Great Britain.

14.5 No respondent offers data or views on the **quantitative costs of the 'initiatives approach'**. However, **13 respondents** (19.4% of those who address Question 14) – comprising ten licensing authorities, two operators and a manufacturer (but, strikingly, no disabled representatives) – **offer qualitative opinions**, as follows:

- any non-regulatory option is open to interpretation and thus legal challenge from industry (suggested by two licensing authorities);
- will or may impose costs on the industry that may not be tolerable unless offset in some way (a fear expressed by seven licensing authorities and two operators, including the key stakeholder NTA); and
- DfT would need to cover the majority of any costs that arise (one licensing authority and one manufacturer, the key stakeholder LTI Vehicles).

14.6 No respondent offers data or opinions on the **quantitative benefits of the 'initiatives approach'**. However, **35 respondents** (52.2% of those who address Question 14) – comprising nine disabled representatives, 22 licensing authorities, three operators and one manufacturer – **offer qualitative views**. Interestingly, more than twice as many consultees offered views on the benefits of the 'initiatives approach' than did so on the costs (see paragraph 14.5). Most respondents specify particular benefits that they envisage would result. These fall into five broad areas, which are covered in detail in the succeeding paragraphs. The approach would:

- demonstrate serious Government commitment;
- raise awareness;
- enable the evidence base to be strengthened;
- improve service offerings to disabled people, with a raft of ancillary benefits as a result; and
- would improve customer levels and thus benefit the taxi industry.

14.7 Five respondents (two licensing authorities and three disabled representatives including DPTAC) suggest that the 'initiatives approach' might demonstrate that the Government is taking action. It might show Government commitment, nationwide, to the social inclusion of disabled people, would address the objectives of the DDA 1995, and send a clear message of intent to the taxi industry.

14.8 Five respondents (one disabled representative and four local authorities) suggest that the approach would serve to raise awareness – of the needs of disabled people, and/or the existence and widespread availability of WAVs.

14.9 Two disabled representatives (including DPTAC) suggest that the approach offers DfT an opportunity to gather information that strengthens the evidence base regarding WAV availability and demand, and regarding the suitability of various measures.

14.10 Twenty-one respondents (31.3% of those who address Question 14 and 60% of those who identify benefits from the 'initiatives approach') suggest, in various ways, that the 'initiatives approach' will improve service offerings to disabled people. Consultees expressing this view comprise three disabled representatives, 17 licensing authorities and one operator, the key stakeholder NPHA. This means that the proportion of disabled representatives who consider that disabled people will benefit from this approach (23.1% of those who responded to Question 14) is considerably less than for licensing authorities (37.8%).

14.11 Respondents identify a number of specific benefits for disabled people, as follows:

- likely improved accessibility for disabled people;
- less confusion for disabled customers;
- greater consistency, nationwide, on services for disabled people; and
- improved taxi fleet standard and greater proportion of trained or informed operators.

14.12 Four stakeholders (two disabled representatives, including DPTAC, and two licensing authorities) also identify the indirect benefits that they envisage would arise as a result of the improved service offering for disabled people. These relate to the wider societal benefits of social integration:

- improving participation in recreation and sports activities (with associated social and health benefits);
- improving employment prospects of disabled people; and
- greater economic participation (and thus consumer spending).

14.13 Four consultees (two each of disabled representatives and licensing authorities) also surmise that the greater access that the 'initiatives approach' would afford to disabled people would result in a greater uptake of services, thus benefiting the taxi industry. One disabled representative, however, cautions that this benefit would be less than would result from a regulatory approach.

14.14 Three consultees (two operators) consider that **no benefit would result from the 'initiatives approach'**, and one key stakeholder (the manufacturer, LTI Vehicles) considers that benefit would be minimal.

14.15 Of the **key stakeholders**, DPTAC considers that benefits would include improving the chances of employment for disabled people, and their access to goods, services and leisure. DPTAC argues that DfT-led initiatives might demonstrate Government commitment to the social inclusion of disabled people, and send out a clear message to the taxi industry. DfT-led initiatives might also enable DfT to gather first hand knowledge of WAV provision and what approaches are working and which not. NALEO regrets that it is among those consultees that considers Question 14 to be too wide-ranging to accurately answer.

14.16 Of the operators, NPHA believes that the disabled population will benefit in that their views are being listened to and their needs being met. While not opposed to initiatives, NTA fears that their cost may be prohibitive. It thus prefers an approach involving guidance and perhaps incentives. Of the manufacturers, Allied Vehicles Ltd considers the proposed approach to be 'probably helpful' provided that it is cost-effective and complements regulations rather than guidance. LTI Vehicles sees no benefit in the 'initiatives' approach, arguing that it would reduce WAV provision, would be costly to the taxpayer, would not deliver the objectives of the DDA 1995 and would perpetuate inconsistency nationwide.

Question 15. 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?

15.1 Only eight substantive responses were received to this question (4.8% of the consultee total), a level that presumably reflects the difficulty in providing or sourcing data. The breakdown of respondents is shown in Table 18.

Table 18. Breakdown of respondents to Question 15

	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled group or perspective (D)	2	25	4.5
Licensing Authorities or representative organisations (LA)	5	62.5	6.2
Vehicle manufacturers (M)	1	12.5	33.3

15.2 Of the substantive responses:

- (a) one disabled representative shares some data concerning the low levels of accessible transport (including taxis) for disabled people who wish to use recreational and leisure facilities in Edinburgh.
- (b) two licensing authorities offer to forward details of the costs of legal bills and officer time relating to defense of appeals (including a judicial review) relating to taxi licensing and accessibility, a problem that one of authorities considers derives from the susceptibility to challenges of guidance and initiatives.
- (c) one manufacturer, the key stakeholder Allied Vehicles Ltd, offers to meet with DfT to discuss likely costs to manufacturers of any specific initiative. One licensing authority makes a similar offer.
- (d) two respondents (one disabled representative and one licensing authority) draw attention to other sources of data:
 - County Council passenger transport initiatives, in Essex at least); and
 - the study *Improved Public Transport for Disabled People* commissioned by the Scottish Executive in 2005/6 (Research Findings N0 220/2006).

Question 16. What do you think about the draft technical specification?

16.1 Eighty-eight responses were received to this question (52.7% of the consultee total), although 22 of these simply made a reference to the respondent's comments on the ostensibly similar Question 5. (A number of consultees state that they do not feel technically qualified to comment on the detail of the specifications, some reserving judgment until a prototype has been developed.) The breakdown of respondents is shown in Table 19.

Table 19. Breakdown of respondents to Question 16

	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled group or perspective (D)	18	20.5	40.9
Licensing Authorities or representative organisations (LA)	57	64.7	71.2
Vehicle manufacturers (M)	2	2.3	66.6
Operators, drivers or operator organisations (O)	10	11.4	29.4
Private individuals not identified elsewhere (I)	1	1.1	50

16.2 The technical aspects of responses to this and the other two technical/enforcement questions (5 and 19) are covered in the Annex. Here we **cover only non-technical issues arising from the responses**. Where respondents solely draw attention to their response to Question 5 (see paragraph 16.1), we judge that their views will have been adequately considered in section 5 and the Annex, and thus do not repeat a summary and analysis of their views again here.

16.3 Three licensing authorities (including the key stakeholder NALEO) **query the need rather than the solution**, i.e. reiterate their concern that there is an inadequate evidence base to justify such measures. These respondents believe that there is a risk of unnecessarily creating a mountain out of a molehill.

16.4 Ten respondents (11.4% of those who address Question 16; comprising six disabled representatives, including the key stakeholder DPTAC, three licensing authorities and one operator) consider that the technical specifications do not focus adequately on the different types of disability.

- DPTAC thinks it important that technical specifications provide accessibility for those with sensory impairments.
- Another disabled representative suggests that all proposed specifications be rigorously tested by disabled people with a variety of different impairments to ensure that they meet their requirements.
- Four respondents identify the pitfalls of a 'one-size-fits-all' approach, two proceeding to suggest a different focus that – rather than interim and enhanced specifications for WAVs – would provide separate specifications for wheelchair accessible Hackney carriages and private hire saloon cars meeting ambulatory accessibility requirements.

16.5 Twenty-three respondents (26.1% of those addressing Question 16) express **explicit support for the interim specification**, considering it workable and achievable. These comprise three disabled representatives (including DPTAC), 19 licensing authorities and one operator. DPTAC and one licensing authority believes this interim standard should be brought in as soon as possible, and one disabled representative proposes advancing the implementation date from 2025 to 2020.

16.6 Set against this, three licensing authorities consider that **the specifications are too prescriptive**. One fears that such an approach will cause considerable migration from the Hackney sector to PHVs. In contrast, one licensing authority

argues that the proposed approach is too basic, and that much more detail is needed, with more input from manufacturers.

16.7 Five licensing authorities voice support for the **proposed approach of staged implementation**, with a move from the interim specification to an enhanced specification over time.

16.8 Twenty-one consultees (23.9% of those who address Question 16) are **relatively negative about the reality of an enhanced specification**. Their principal concerns are as follows.

(a) Twelve respondents (nine licensing authorities and three operators) argue that the enhanced specifications will have to be assessed in conjunction with the current legislation as they may cause an impossible burden on the existing trade and may cause existing hackney carriage proprietors to move over to private hire.

(b) Four licensing authorities (including NALEO) and one operator argue that moving to such a costly specification seems excessive without a strong supportive evidence base; at present, NALEO and one other licensing authority argue, the cost:benefit ratio seems "Wednesbury unreasonable".

(c) Three licensing authorities and disabled representative argue that any enhanced specification would need a long lead-in time to be feasible.

16.9 Consultees raise a range of other issues, none of which are supported by more than two respondents. These are as follows:

- the enhanced specification will need to develop over time if it is to keep pace with the changing specification of mobility aids, and the needs of a population that is increasing in both weight and age;
- short-wheelbase minibuses might be licensed as Hackney carriages as they are big enough to carry the larger wheelchairs;
- accessible taxis should be required to meet the European Whole Vehicle Type Approval;
- VOSA should have a role in assessing whether new or converted vehicles meet the future specifications; and
- clarity is needed as to whether the different elements of the specification are to apply to a single vehicle or to different types of vehicle.

Question 17. What do you think are the potential impacts, costs and benefits of a regulation?

17.1 One-hundred-and-five responses were received to this question (62.9% of the consultee total). The breakdown of respondents is shown in Table 20.

Table 20. Breakdown of respondents to Question 17

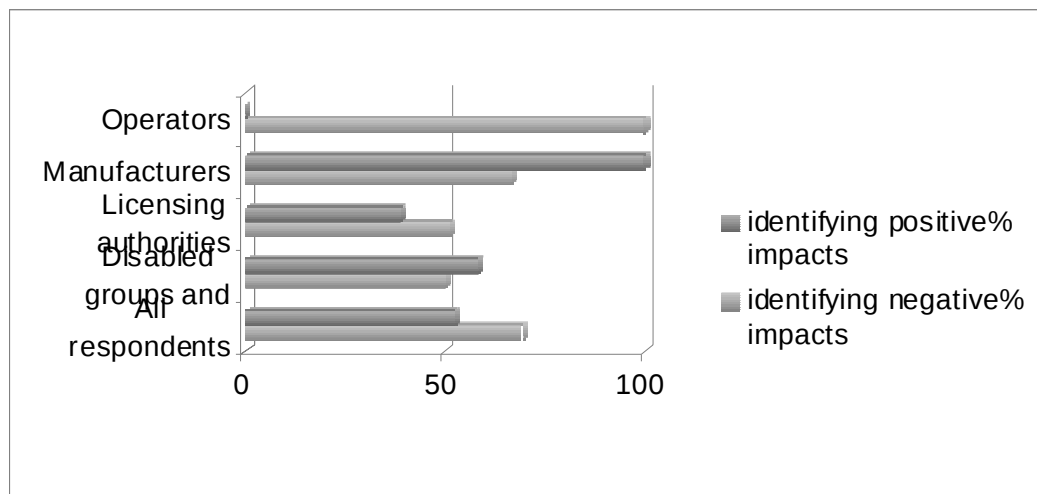
	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled groups/perspectives	20	19.0	45.5
Licensing Authorities or representative organisations	68	64.8	85
Vehicle manufacturers	3	2.9	100
Operators, drivers or operator	14	13.3	41.2

organisations			
Private individuals	1	0.9	50

17.2 Seventy-two respondents (68.6% of those who address Question 17) **offer clear views on the impacts of the regulatory approach** (summarised in Figure 19). These comprise: 12 disabled representatives, 52 licensing authorities, four operators, three manufacturers and one individual. Of this subset of respondents,

- just over half identify positive impacts associated with regulation, but seven in ten identify negative impacts;
- 58.3% of disabled representatives identify positive impacts and 50% negative impacts.;
- 38.9% of licensing authorities identify positive impacts and 51.4% negative impacts;
- all manufacturers identify positive impacts and two-thirds negative impacts; and
- operators only identify negative impacts.

Figure 19. Stakeholder groups' perception of the nature of impacts of the regulatory approach



17.3 Thirty-eight respondents (36.2% of those who address Question 17 and 52.3% of those who suggest impacts of any kind) **identify impacts that can be deemed broadly positive in nature**. These respondents comprise seven disabled representatives (including DPTAC, a key stakeholder), 28 licensing authorities (including the key stakeholder NALEO) and three manufacturers (including the key stakeholders Allied Vehicles Ltd and LTI Vehicles). The positive impacts identified fall into three broad areas, each of which are considered in turn (and are summarised in Figure 20):

- improved consistency, clarity and/or equality;
- improved service for wheelchair users; and
- a boost to the market.

17.4 Twenty-eight respondents (38.9% of those who identify any form of impacts) consider that regulation would result in improved consistency, clarity and/or equality. These respondents comprise two disabled representatives, 22 licensing authorities (including NALEO), two manufacturers (including the key stakeholder LTI Vehicles). These consultees consider that regulation would:

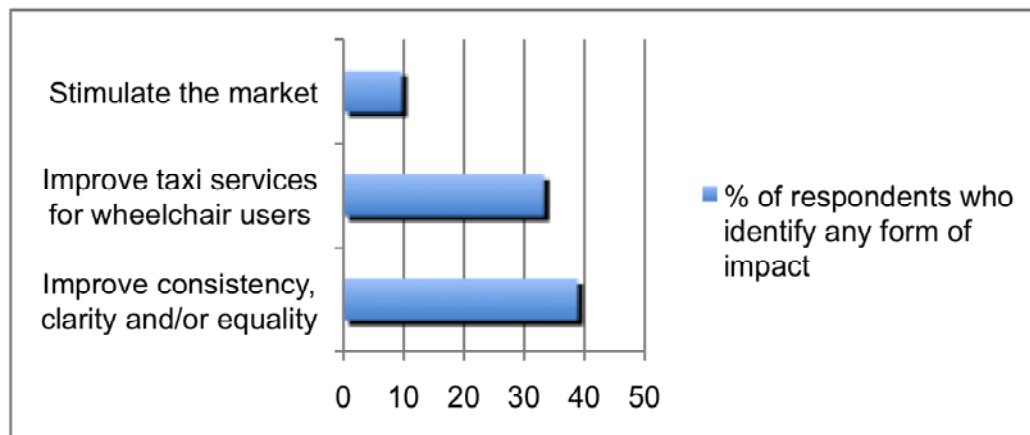
- produce a nationally consistent standard and a consistent approach to licensing;

- create level playing-field nationwide, eradicating local differences in service provision; and/or
- improve clarity and transparency.

17.5 Twenty-four respondents (33.3% of those who identify any form of impacts) consider that regulation will improve taxi services for wheelchair users and thus improve their accessibility. These respondents comprise six disabled representatives (a noticeably higher proportion than for other positive impacts identified), 15 licensing authorities (including NALEO), and three manufacturers (including Allied Vehicles and LTI Vehicles). These consultees consider that regulation would give certainty about WAV provision to disabled people. As a result, they are more likely to use service more frequently. This would not only help improve independent living and a reduction in social exclusion for disabled people, but also bring an additional revenue stream to the taxi industry.

17.6 Seven respondents (9.7% of those who identify impacts of any kind) consider that (only) regulation would stimulate the market sufficiently to convince manufacturers that they have a viable market to supply. Five licensing authorities (including NALEO) and two manufacturers (Allied Vehicles Ltd and LTI Vehicles) identify this impact.

Figure 20. Respondents' views on the likelihood of specific positive impacts of a regulatory approach



17.7 Fifty respondents (47.6% of those who respond to Question 17 and 69.4% of those who identify any form of impact) **identify impacts that can be deemed broadly negative in nature** (summarised in Figure 21). These respondents comprise six disabled representatives, 37 licensing authorities (including the key stakeholder NALEO), four operators and two manufacturers (including LTI Vehicles) and one individual. The negative impacts identified fall into five broad areas, each of which is considered in turn:

- increased disparity in regulatory treatment between Hackney carriages and PHVs;
- increased likelihood of drivers migrating from Hackney carriages to PHVs;
- harder for Local Authorities to address local needs;
- no beneficial impact for the ambulatory disabled; and
- adverse impacts of the larger vehicles mandated.

17.8 Nine respondents (12.5% of those who identify any form of impact; comprising three disabled representatives and six licensing authorities) argue that

while regulation may create a level playing-field for Hackney carriages, it would exacerbate regulatory differences between hackney carriages and PHVs.

17.9 Thirty-one respondents (43.1% of those who identify negative impacts) consider that – unless the increased costs are offset or unless regulatory reform is extended to PHVs – the increased regulatory burden on Hackney carriages is likely to result in migration from the sector to PHVs, which in turn will result in lower levels of WAV provision.

- These respondents comprise two disabled representatives, 27 licensing authorities (including NALEO) and two operators.
- Only two consultees – both manufacturers (including LTI Vehicles) – explicitly disagree with this premise.

17.10 Ten respondents (13.9% of those who identify negative impacts) believe that a one-size-fits-all regulation that mandates 100% compliance with a specification would make it harder for Local Authorities to address local needs. These respondents comprise two disabled representatives, six licensing authorities, one operator and one individual.

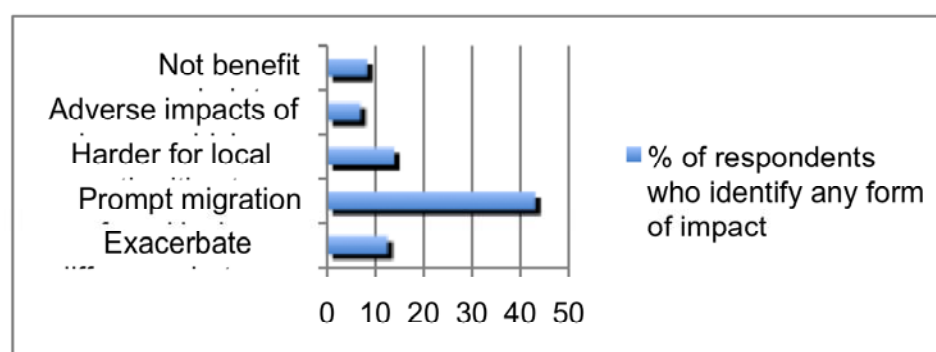
- Respondents argue that such a regulation would not reflect geographical and demand differences across the country.
- Most advise that there remains a need for local determination of fleet composition, and a need for local flexibility to decide what type of transport improvements (including outside the taxi sector) would be most relevant to address local needs.

17.11 Six respondents (8.3% of those who identify negative impacts; equally split between disabled representatives, licensing authorities and operators) consider that a regulatory approach focused on WAVs will not necessarily produce beneficial impact for the ambulatory disabled. As these respondents (and a number of others in their response to other Questions) articulate, ambulatory disabled often prefer saloon cars to WAVs. A regulation thus risks reducing the number of vehicles that may be suitable for this disabled group's accessibility needs.

17.12 Five licensing authorities (6.9% of those who identify negative impacts) identify two adverse impacts of the larger vehicles that the technical specifications are likely to mandate:

- increased carbon dioxide emissions; and
- associated changes to transport infrastructure (e.g. taxi ranks and speed bumps) will be necessary.

Figure 21. Respondents' views on the likelihood of specific negative impacts of a regulatory approach



17.13 No respondent offers data or views on the **quantitative costs of the regulatory approach**. However **33 respondents** (31.4% of those who address Question 17) **offer qualitative opinions**. These respondents comprise 20 licensing authorities (including NALEO), ten operators (including the key stakeholders NTA and NPHA) and two manufacturers (including LTI Vehicles). No disabled representative addressed cost issues associated with regulation. Views cover three broad areas, namely:

- a concern that DfT have overestimated the costs of the regulatory approach;
- an observation that costs will actually fall on users, rather than the taxi industry; and, in particular,
- a widespread wariness of the regulatory approach on the grounds that costs greatly exceed benefits.

17.14 Three respondents (9.1% of those who offer views on the costs of a regulatory approach; comprising one licensing authority and two manufacturers, the latter including LTI Vehicles) consider that DfT may have overestimated costs of the regulatory approach. All consider that the regulatory approach should lower licensing costs. The licensing authority suggests that some WAVs cost less than the £20–30,000 quoted, and that option of leasing does not appear to have been factored into calculations.

17.15 Four licensing authorities (including NALEO; 12.1% of respondents who offer views on costs) argue that the additional costs imposed by regulation would not fall on the industry, as many are claiming, but actually on users, because Local Authorities would be lobbied to increase tariffs.

17.16 Noting the DfT assessment that the likely costs of a regulatory approach greatly exceed the likely benefits, 25 respondents (75.8% of those who offer observations on the costs of regulation) are wary of or object to the regulatory approach on cost grounds. These respondents comprise 14 licensing authorities, ten operators (including NTA and NPHA) and one individual. For this subset of consultees, the cost:benefit ratio appears highly unattractive. They believe that demand will be too low for operators to recoup the increased costs, i.e. the return on investment will be insufficient.

17.17 DPTAC, a key stakeholder, turns the issue of costs on its head by suggesting that DfT need to quantify the costs of not regulating, for example the diminished value and return on expenditure to make other transport modes accessible if disabled people cannot access public transport interchanges in the first place.

17.18 No respondent offers data or opinions on the **quantitative benefits of the regulatory approach**. However 14 respondents (13.3% of those who address Question 17) offer qualitative opinions. These respondents comprise five disabled representatives (including DPTAC), eight licensing authorities and one operator. Respondents specify particular benefits that they envisage would result.

- (a) Five respondents (two disabled representatives, two licensing authorities and an operator) consider that a mandatory or regulatory approach is most likely to achieve the desired goals.
- (b) Three licensing authorities consider that one benefit derived from the certainty and consistency offered by a regulation would be a reduction in legal challenges to licensing authority policies and decisions.
- (c) Four respondents (one disabled representative and three licensing authorities) consider that a regulatory approach would facilitate enforceability.
- (d) One disabled representative argues that demand will increase, and thus the benefits to industry have been underestimated, if taxi travel for the disabled were subsidised and if disabled people were certain of WAV availability.
- (e) DPTAC argues that DfT need to revisit its impact assessments in order to quantify benefits to the wider economy of ensuring access to goods, services and jobs for disabled people, and benefits which owning an accessible taxi have brought to taxi drivers in opening up new markets and contracts.

17.19 A handful of consultees offer additional comments regarding the regulatory approach that relate neither to costs nor benefits.

- Eight respondents (one disabled representative, six licensing authorities including NALEO and one operator, NPHA) consider that the current evidence base is too inadequate for them and DfT to be able to take a decision, at present, on the suitability of a regulation;
- Five respondents (four licensing authorities and an operator) argue that a mixed fleet approach would more appropriate than a 100% WAV approach as it would meet the needs of the wider disabled community;
- One operator suggests the possibility of introducing different compliance dates in different areas, specifically rural and urban areas.

17.20 Of **key stakeholders**, DPTAC argues that regulation would result in a far better, quicker and more consistent journey experience. DPTAC identifies a range of benefits that it considers DfT should quantify. DPTAC also considers that DfT should quantify the costs of not regulating. NALEO considers that the case for regulation remains unproven, and that further evidence must be gathered and assessed before a decision can be taken. NALEO argues that any cost increase would be passed to users, and would result in a reduction in demand and thus migration from WAVs to PHVs. However, NALEO considers that a minimum enhanced vehicle specification set by Statutory Instrument would produce clarity and certainty would perhaps be sufficient to make manufacturers move into this market area.

17.21 NPHA fears that costs will be passed to the user and result in a decline in demand, and thus in the viability of the WAV fleet. NTA does not support regulation. Allied Vehicles Ltd believes that careful regulation will prove to be the most cost-effective solution. Allied Vehicles argues that a national standard for WAVs will stimulate market competition and innovation.

Question 18. 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?

18.1 Only 14 responses were received to this question (8.4% of the consultee total). The breakdown of respondents is shown in Table 21. In addition, four consultees drew attention to information that they provide in responses to other Questions and one expresses concern at the overall paucity of data supplied by DfT.

Table 21. Breakdown of respondents to Question 18

	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled groups or perspectives	2	14.3	4.5
Licensing Authorities or representative organisations	9	64.3	11.2
Vehicle manufacturers	3	21.4	100
Operators, drivers or operator organisations	1	7.1	3.0

18.2 Few responses are particularly substantive. Among licensing authorities:

- one offers to share results of two recent 'unmet demand surveys' undertaken within its Borough;
- one summarises its recent survey, where consultees tended to favour both the introduction of a limit and the maintenance of a mixed fleet, but did not address the incompatibility of these measures with improving accessibility to taxis for disabled people;
- one indicates issues that might be explored in a detailed impact assessment: who might absorb costs of regulating; the costs of not regulating; and comparative costs with other transport-access regulations;
- one gives statistics relating to the envisage increased carbon dioxide emissions, namely an increase of 2.7 tonnes for every additional WAV that replaces a saloon car; and
- three dispute the assertion that there would be no additional enforcement costs for licensing authorities.

18.3 Among manufacturers:

- the key stakeholder Allied Vehicles Ltd, may have access to a range of potentially useful data that it would be happy to share in response to specific queries;
- another manufacturer suggests that WAV taxis that fit the interim standard can be bought for as little as £20,000, which is readily affordable at current interest rates;
- the same manufacturer disputes belief that regulating will provoke migration from Hackneys to PHVs, citing evidence from South Ayrshire, where Hackneys were deregulated on condition that all vehicles are wheelchair accessible, and Hackney provision almost quadrupled in one year.

18.4 One **manufacturer**, the key stakeholder LTI Vehicles, provides data that supports its argument that impact assessment was based on flawed assumptions and that implementation costs have been overstated. LTI Vehicles argues that:

(a) the assumption that saloon car drivers buy used cars, but WAV-drivers buy new vehicles is incorrect, as the factors behind the purchase decision are unchanged regardless of vehicle choice. On the basis of revised assumptions, LTI Vehicles calculates that the overall costs to drivers of replacing 35,000 saloon cars over 12 years would reduce by £70m to £97m if all drivers bought used vehicles.

(b) more used WAVs are sold each year than new, so the used vehicle market is vibrant and costs to drivers are lower. LTI Vehicles suggests that a typical WAV costs £25,000 new but £9,000 when six years old.

(c) the basis of these revised assumptions is flawed. LTI Vehicles calculates that the overall costs to drivers of replacing 35,000 saloon cars over 12 years would reduce by £70m to £97m if all drivers bought used vehicles.

(d) evidence from ComCab and ComputerCab (whose drivers earn 20–30% of their account-based income through the TaxiCard scheme) suggests that the assumption that turnover would increase by only 1% is likely to be an underestimate given that 18% of the population is classified as disabled. Accordingly, LTI argues, a 2% increase would be a more reasonable basis for calculations.

18.5 One **disabled representative** recalls that the annual cost of implementing a National Taxicard Scheme is estimated to be £7–12m, assuming that the take up is well below the maximum allowable. Another disabled representative stresses that its own research suggests that disabled people would make many more taxi journeys (and thus potential benefits for taxi drivers would rise) if two key issues can be addressed:

- that disabled people are able to be certain that they will be able to access taxi services; and
- that the issue of the potential long-term cost of frequent taxi use for frequently low-income disabled people is addressed, e.g. through a Taxicard scheme.

18.6 Among **operators**, one recalls data provided on WAV demand and use contained in the ECMT report. Another operator agrees with the DfT assessment on additional running costs of around £20/week, but suggests that this was not be unaffordable.

Question 19. How do you think that a technical standard should be enforced?

19.1 Ninety-one responses were received to this question (54.5% of the consultee total). The breakdown of respondents is shown in Table 22.

Table 22. Breakdown of respondents to Question 19

	Number of responses	% of total responses to this question	% respondents of total stakeholder group
Disabled groups or perspectives	16	17.6	36.4
Licensing Authorities or representative organisations	52	57.1	65
Vehicle manufacturers	3	3.3	100
Operators, drivers or operator organisations	19	20.9	57.6
Private individuals not identified elsewhere	1	1.1	50

19.2 The views on the enforcement options (and the two technical questions, 5 and 16) are covered in the Annex. There are no other issues to raise in relation to Question 19.

ANNEX

Taxi Consultation (technical specifications and enforcement) Final Report August 2009

Prepared by:
SAVE Transport Consultancy
ST Aubins
Knockholt Road
Halstead
Sevenoaks
Kent
TN14 7ES

Department for Transport Taxi Consultation (technical specifications and enforcement) – Final Report (draft)

Response to the technical specifications and their enforcement

1. Overview

The Department for Transport (DfT) issued a consultation in February 2009 entitled 'Consultation on Improving Access to Taxis' with a closing date of 24 April 2009. The consultation sought answers to a number of questions two of which (questions 5 and 16) relate to proposed technical specifications for an accessible taxi and one (question 19) to the method of enforcement of such a specification. Most respondents have taken questions 5 and 16 to be the same. This report relates only to the response to questions 5, 16 and 19 and general comments where reference is made to the specifications or their enforcement.

Many comments have been general in nature about the merits or otherwise of the specifications and how they may be applied. Some are concerned about the cost and achievability of the enhanced specification whilst most assume that the interim specification can be achieved in a relatively short timescale. In some cases there seems reluctance to support the specifications on the basis that a fully wheelchair accessible fleet is not supported with some requesting a saloon car specification to assist ambulant disabled people. Those showing interest in a saloon car specification have not indicated whether or not Part 2 of the technical specification is suitable. Those supporting the technical specification overall seem to have assumed that all three parts of the specification will apply to a wheelchair accessible taxi as there are no comments to the contrary.

There is relatively little input from manufacturing industry making the results somewhat biased towards the views of licensing authorities, disabled groups and operator interests. That said, one manufacturer has provided much input to the specifications. Apart from the manufacturers the level of technical knowledge and ability to comment on the technical specifications is openly declared as being low by many respondents.

It should be noted that where comments have been made on the technical specifications they do not in the main differentiate between the Interim and Enhanced specifications. It is also not always clear whether a comment relates to section 1 or section 2. Judgement has been made as to the specification or section to which a comment is applicable.

The method of enforcement has also caused some confusion. Some have taken this to be the inspection process whereas others have indicated a preference to a national standard or one of the three bullet point options in the consultation document. Where a national standard is preferred it is assumed to mean options 1 or 2 and where Licensing Authority enforcement is indicated then that may be options 2 or 3. It is clear from some respondents that a national standard should be both a minimum and a maximum standard so that nothing more should be specified by Licensing Authorities (on a mandatory basis) to eliminate cross boundary differences between authorities.

2. Quantative Assessment

A total of 167 respondents have been recorded

The respondents have been grouped according to their main interests as follows:

Disability Group	44
Individual	2
Licensing Authority	80
Manufacturer	3
Operator/Organisation	34
Research organisation	1
Standards organisation	2
Training organisation	1

3. Key Organisations

The general views of six key organisations are given below representing the main groups responding to the consultation. Two manufacturers are included because the manufacturing trade bodies have not provided their own response.

The Disabled Persons Transport Advisory Committee (DPTAC) are of the view that the technical specification is not drafted from a pan disability perspective as it misses out the needs of those with sensory impairments and that all taxis be capable of carrying guide dogs and other assistance dogs. DPTAC believe that the requirements of the enhanced specification in terms of interior manoeuvring space and not permitting more than 1 intermediate step will prove problematic to deliver. DPTAC support enforcement by regulation and policed by Licensing Authorities.

LTI Vehicles have indicated their support for the interim specification as it would improve accessibility for disabled people, it would be quick to introduce because their vehicle already complies and ensure that there are many accessible taxi conversions able to meet the standard in the market place. However, in the case of the enhanced standard LTI do not feel able to draw an accurate conclusion as it requires a detailed study of the capital and manufacturing costs and potential sales. In their view a specification should set a minimum standard and implemented under section 32 of the 1995 DDA.

Allied Vehicles believe that regulations could effectively be applied to enforce only the interim specification at this time but consider the interim specification to be seriously flawed in certain key aspects and fails to meet the criteria that it is broadly based upon existing vehicle designs and current technology. As for the enhanced specification they state that at present, no vehicle meets the specification and the costs and regulatory impact of requiring compliance may be prohibitive and may result in fewer accessible taxis.

The National Association of Licensing and Enforcement Officers (NALEO) do not consider that the interim specification should cause any great technical problems but because older Fairways and Metrocabs will not meet the requirements there is a risk there may be a dip in wheelchair accessible vehicle provision. They believe the enhanced specification can only be assessed when a number of issues are settled namely to: clearly define the meaning of “persons with a disability”; establish the extent to which the needs of the “ambulatory disabled” can be met by a wheelchair accessible vehicle; establish the extent to which wheelchair users need a wheelchair accessible vehicle; ensure that compliant vehicles are available and; establish the cost of vehicles manufactured to meet the enhanced specification.

The National Private Hire Association (NPHA) do not feel they are qualified to comment on the technical specifications but in the light of TRL reports believe that the recommendations on wheelchair and occupant restraint systems should be implemented as a matter of

urgency. Implementation should be through guidance or set proportions of the fleet that need to be wheelchair accessible depending on the area of operation.

The National Taxi Association (NTA) representing the views of taxi drivers do not feel qualified to comment on the technical specifications. As for enforcement, they state this should be by licensing authorities according to legal requirements.

4. Technical Specifications and Enforcement

Interim Specification

Support for the Interim Specification has been indicated by 63 respondents with some seeking enhancement of the specification primarily to assist those with sensory impairments. This support is largely based on the assumption that this standard can be met by existing designs, a view not necessarily supported by those with a more detailed knowledge of current vehicle designs. There were none positively rejecting the interim specification but this fact should be read in conjunction with the view by some that the DfT should not regulate.

Other concerns are the small wheelchair space and several subjective aspects of the specification.

Enhanced Specification

Support is very mixed, of the 167 respondents only 37 have given any significant views of which 4 have neither supported nor rejected the specification. Of the remainder, 8 have positively rejected it and 25 have indicated support albeit that some have indicated a long timescale, demonstration of its feasibility and concerns about the cost. Some have simply said they support the specification which could mean one or both specifications but is assumed to mean both. Support has come from Licensing Authorities and Disabled Groups whereas those rejecting the specification are Licensing Authorities and Operator Groups.

The vast majority seem unable or unwilling to judge the merits of this specification or only support it as part of a mixed fleet operation. There is a good deal of uncertainty surrounding the impact of the enhanced specification in terms of cost and achievability and its impact on the trade.

Enforcement

Out of the 167 respondents 91 offered a view on enforcement of which 4 suggested no enforcement action which may in part be due to uncertainty about the technical specifications themselves. Enforcement was taken to mean vehicle inspection by 5 respondents with one suggesting that the inspection of accessibility standards be part of the annual MoT. The remaining 75 are recorded as supporting one or more of the options given in the consultation document based on the bullet point options to paragraph 2.49 taken in order. The response has been allocated to one or more of the bullet point options based on the comments given whether or not a specific reference has been made to these options. On this basis support was assessed as follows:

Paragraph 2.49 option	No. of respondents	No. of respondents (including multiple options)
1	11	39
2	18	55
3	10	21
1 or 2	26	
2 or 3	9	
1, 2 or 3	2	

Wheelchair Accessibility Requirements – detailed comments

In the table the following coding has been used: D = disabled group/perspective, I = private individual, LA = licensing authority or organisation, M = manufacturer, and O = operator or operator organisation. The figure in brackets after the code represents the number of such organisations making the comment.

	Initial Specification	Enhanced
Section 1		
1. Wheelchair spaces		
Number required		
Orientation	Delete rearward facing – LA(1)	Delete rearward facing – LA(1)
2. Forward facing wheelchair spaces		
Wheelchair space requirements	Add provision for scooters and other mobility aids – LA(1) Increase space for 99% of wheelchairs – LA(1) Must carry reference wheelchair and space for a passenger – D(1) Increase size of wheelchair space – LA(2) Make provision for wider wheelchairs – D(1) Length of wheelchair space inadequate – M(1)	Add provision for scooters and other mobility aids – LA(1) Increase space for 99% of wheelchairs – LA(1) Must carry reference wheelchair and space for a passenger – D(1) Height of wheelchair space excessive, reduce to 1450mm – M(1)
Gradient	Specify a flat floor – D(1) Adopt enhanced requirements – M(1)	Specify a flat floor – D(1)
Acceptable intrusions into the		

wheelchair space		
Wheelchair user safety provisions	Add TRL provisions for head and back restraint – O(1) Concerned there are no quantitative requirements – M(1) Safety standards are not addressed M(1)	Add TRL provisions for head and back restraint – O(1) Safety standards are not addressed M(1)
3. Rearward facing wheelchair spaces		
Wheelchair space requirements	Add provision for scooters and other mobility aids – LA(1) Increase space for 99% of wheelchairs – LA(1) Must carry reference wheelchair and space for a passenger – D(1) Increase size of wheelchair space – LA(2) Make provision for wider wheelchairs – D(1) Length of wheelchair space inadequate – M(1)	Add provision for scooters and other mobility aids – LA(1) Increase space for 99% of wheelchairs – LA(1) Must carry reference wheelchair and space for a passenger – D(1) Height of wheelchair space excessive, reduce to 1450mm – M(1)
Gradient	Specify a flat floor – D(1) Adopt enhanced requirements – M(1)	Specify a flat floor – D(1)
Acceptable intrusions into the wheelchair space		
Wheelchair user safety provisions	Add TRL provisions for head and back restraint – O(1) Concerned there are no quantitative requirements – M(1)	Add TRL provisions for head and back restraint – O(1) No specification suitable for rearward facing wheelchairs – M(1)

	Safety standards are not addressed M(1)	Safety standards are not addressed M(1)
Other	Add mirror for rear facing wheelchair user - D(1)	Add mirror for rear facing wheelchair user – D(1)
4. Boarding lifts and ramps		
Safe working load	Increase to 350kg – LA(2)	Increase to 350kg – LA(2), M(1)
Means of preventing the vehicle being driven away	Too vague and unnecessary as most can only be operated with the door open – M(1) Specify automatic retraction or warning of deployed ramp (or step) – LA(1)	Too vague and unnecessary as most can only be operated with the door open – M(1) Specify automatic retraction or warning of deployed ramp (or step) – LA(1)
Dimensions	Clarify meaning of ‘single piece’ ramp – M(1) Increase ramp length – LA(1)	Clarify meaning of ‘single piece’ ramp – M(1) Ramp width should be 750mm minimum – M(1)
Ramp gradients		Ramp gradient/length too demanding – M(1)
Slip resistant surfaces		
Handrails		
Guards	Add ramp upstands as enhanced specification – LA(1), M(1)	

Colour contrasting edge markings		
Control and fail-safe mechanisms for power operated equipment		
Load sensors and re-cycling mechanisms for power operated equipment	Specify a force for the device to prevent injury to avoid subjective assessment – M(1)	Specify a force for the device to prevent injury to avoid subjective assessment – M(1)
Manual override provisions for power operated equipment	Not clear what ‘repeatedly operate’ means – M(1)	Not clear what ‘repeatedly operate’ means – M(1)
Manual/portable ramp and stowage provisions		
Other	Specify space to stow a folded wheelchair – LA(1) Specify under floor ramp – D(1) Add audible and visual warnings for boarding device – LA(1)	Specify space to stow a folded wheelchair – LA(1) Specify under floor ramp – D(1) Add audible and visual warnings for boarding device – LA(1)
5. Entrances and exits		
Number and	There should be side and rear exits – LA(1)	There should be side and rear exits – LA(1)

position	Rear access should not be permitted – LA(2), D(1), M(1) Require access from both sides – LA(2), D(1) Ensure there are two exits – D(1) Concerned about rear and offside loading – LA(1) Require rear loading – LA(1)	Rear access should not be permitted – LA(2), D(1), M(1) Require access from both sides – LA(2), D(1) Ensure there are two exits – D(1) Concerned about rear and offside loading – LA(1) Require rear loading – LA(1)
Minimum doorway width	Wide access door needed – D(1)	
Minimum doorway height		
6. Interior manoeuvring space		
From a wheelchair entrance to a wheelchair space	Specify turning circle inside – D(1) Add a requirement – M(1)	Interior manoeuvring space will prove problematic to deliver D(1)
From a wheelchair space to a wheelchair exit	Add a requirement – M(1)	
Floor gradient		
7. Signs and Markings		
Interior		
Exterior		

Section 2		
1. Entrances and Exits		
Number and location		
Aperture dimensions	Increase door headroom – TX is poor – D(1) Specify door aperture height – D(2)	Increase door headroom – TX is poor – D(1) Door height excessive – M(1) Clarify door aperture requirements – M(1)
Manual door design		Door handle design and length, are they mandatory i.e. use of the word “should” suggests they are not? – M(1)
Powered door requirements	Link to ‘only when stationary and foot brake not applied’ to align with current practice – M(1) Specify a force for the device to prevent injury to avoid subjective assessment – M(1)	Link to ‘only when stationary and foot brake not applied’ to align with current practice – M(1) Specify a force for the device to prevent injury to avoid subjective assessment – M(1)
other	Add colour contrast for door step and head – D(3)	Add colour contrast for door step and head – D(3)
2. Interior space		
Floor	Add slip resistant floor surface – D(1)	
Other	Add colour contrast for seats against floor colour – D(3) Specify interior height – D(2) Add space for guide dog – D(2)	Add colour contrast for seats against floor colour – D(3) Specify interior height – D(2) Add space for guide dog D(2)

	Specify minimum luggage space – LA(2) Add requirement for easy clean floors – D(1)	Specify minimum luggage space – LA(2)
3. Priority seats		
Provision	Define multi-axis and whether this can apply to powered seats that can move towards the door aperture and how the door aperture is defined – M(1) Clarify multi-axis – LA(1) Specify swivel seat – D(2), LA(1), M(1)	Define multi-axis and whether this can apply to powered seats that can move towards the door aperture and how the door aperture is defined – M(1) Clarify multi-axis – LA(1) Specify swivel seat – D(2), LA(1), M(1)
Orientation		
Spacing		
Dimensions		
4. Steps		
Dimensions	If a sill height of 320mm is acceptable then a step height of 250mm is inconsistent - M(1) Subsequent step heights are inconsistent with PSVAR - M(1)	If a sill height of 320mm is acceptable then a step height of 250mm is inconsistent - M(1) Subsequent step heights are inconsistent with PSVAR - M(1)
Design features		
Max number of intermediate steps from ground to	Require intermediate step M(1)	Require intermediate step M(1) Not permitting more than 1 intermediate step will prove problematic to deliver. D(1)

vehicle floor		
Step operation for non-fixed steps	Add demountable steps for non-wheelchair users – D(1)	Add demountable steps for non-wheelchair users – D(1)
Requirements for power operated steps	Powered step requirements should follow bus requirements - M(1)	Powered step requirements should follow bus requirements - M(1)
5. Handrails and handholds		
Position	Specify minimum number and position – LA(1)	Specify minimum number and position – LA(1)
Dimensions		
Design		
Section 3		
1. Communication devices and displays – if required		
Requirements and dimensions for 'Taxi' sign	Make mandatory – D(2)	Make mandatory – D(2)
Provision of induction loops	Make mandatory – D(2) Require hearing loops – D(2) Require hearing loop sign – D(1)	Make mandatory – D(2) Require hearing loops – D(2) Require hearing loop sign – D(1)
Fare meters	Make mandatory – D(2)	Make mandatory – D(2)

	Charging meters should be audible and visual and have a visual display and speaker in the rear of the cab – D(1), LA(1) Require talking meters – D(1)	Charging meters should be audible and visual and have a visual display and speaker in the rear of the cab – D(1), LA(1) Require talking meters – D(1)
Other	Add communication for rear facing wheelchair user – LA(1) Add tactile controls – D(3) Add electronic display and keyboard – D(1) Put window and microphone buttons near partition – D(1)	Add communication for rear facing wheelchair user – LA(1) Add tactile controls – D(3) Add electronic display and keyboard – D(1) Put window and microphone buttons near partition – D(1)
2. Kneeling systems		
Design features		
3. Lighting		
Design features	Add floor illumination – LA(1) Add illumination of ramp and steps – LA(1)	Add floor illumination – LA(1) Add illumination of ramp and steps – LA(1)