



Comments from Imtac on the public consultation on proposed Taxi Accessibility Regulations

April 2014

Imtac is committed to making information about our work accessible. Details of how to obtain information in your preferred format are included on the next page.

Making our information accessible

As an organisation of and for disabled people and older people Imtac recognises that the way information is provided can be a barrier to accessing services and participation in public life. We are committed to providing information about our work in formats that best suit the needs of individuals.

All our documents are available in hard copy in 14pt type size as standard. We also provide word and pdf versions of our documents on our website – www.imtac.org.uk. In addition we will provide information in a range of other formats. These formats include:

- Large print
- Audio cassette or CD
- Daisy disc
- Braille
- Electronic copies on disc or via email in PDF or word
- Easy read

We will also provide information about our work in other languages if you require this.

If you would like this publication in any of the formats listed above or if you have any other information requirements please contact:

Michael Lorimer
Imtac
Enterprise House
55-59 Adelaide Street
Belfast BT2 8FE

Telephone/Textphone: 028 9072 6020
Fax: 028 9024 5500
Email: info@imtac.org.uk

About Imtac

Imtac is a committee of disabled people and older people as well as others including key transport professionals. Our role is to advise Government and others in Northern Ireland on issues that affect the mobility of older people and disabled people.

Our aim is to ensure that older people and disabled people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Regional Development (DRD).

General comments

Imtac welcomes the opportunity to respond to the current consultation. The Committee has been a key stakeholder throughout the review of taxi regulation and the passage and implementation of the Taxis Act 2008. A key priority for Imtac and disabled people during this process has been the accessibility of taxis. The Committee recognises that not all disabled people or older people need a wheelchair accessible vehicle (WAV). However our members and other disabled people who do need this type of vehicle tell us there are real difficulties obtaining this type of vehicle and that the design of some current WAVs are not safe. In responding to the current proposals Imtac will consider two issues; (1) will the proposals result in an increased number and availability of WAVs and (2) will the proposals result in safer taxi services for wheelchair users.

The Committee commends the Department of the Environment (DoE) for commissioning research to inform the current proposals. Imtac believes that the consultants have produced three excellent reports that provide the DoE with a strong evidence base for the proposals.

Specific comments on the proposed Regulations

Broadly Imtac is supportive of the proposed Taxi Accessibility Regulations. In general the Committee believes the new Regulations are a major improvement on existing Regulations and will meet one of our key priorities – to make taxi services safer for wheelchair users and other disabled and older passengers. However the Committee does have some concerns about the detail of the proposals. We have

highlighted these concerns in response to the questions asked in the consultation paper. In addition Imtac has concerns that our second priority – increasing the numbers and availability of WAV's – is not adequately addressed by the consultation. The Committee has therefore included additional comments on this issue in our response.

Q1: Do you agree that non-wheelchair accessible taxis should still be permitted to carry wheelchair users if requested to do so?

Many wheelchair users can use saloon taxis with relative ease. This requires the driver to store their wheelchair in the boot of the taxi. For many wheelchair users this means that taxi services are more readily available and importantly affordable, as these services tend to be less expensive than a WAV. Imtac does not see any benefit for disabled people or older people in stopping this practice. The Committee therefore supports the proposal that non-wheelchair accessible taxis should still be permitted to carry wheelchair users.

Q2: Do you agree that existing wheelchair accessible taxis (i.e. those currently licensed as Belfast Public Hire) should be permitted to continue operating as wheelchair accessible for up to 5 years provided they can comply with the existing wheelchair accessible specification?

Imtac recognises that the introduction of new regulations must be phased in over time, as current WAV taxi providers need time to replace existing vehicles. In principle Imtac believes that the proposed 5 year transitional period is reasonable. Having said this there are specific issues around the Belfast Public Hire taxi fleet that we believe need to be addressed by additional measures. ITP suggested in their research that the lifespan of a WAV is around 5 years. However the reports go on to point out that currently in Belfast there is a significant number of Fairway, Metrocab and TX1 type taxis. In some cases these vehicles are 20 years old. The Committee believes that action is needed to address this issue now, as these vehicles do not, in our opinion, offer a safe level of access for wheelchair users and other disabled people. We would therefore recommend that the DoE set a maximum age limit for taxis in Northern Ireland. Imtac believes that only allowing vehicles manufactured after 2000 to be recognised as WAV represents a reasonable approach to this issue. The Committee would also recommend that the DoE periodically review any maximum age limit. As ITP point out owners of vehicles affected by any maximum age limit could continue to provide taxi services, just not as a recognised WAV.

Q3. Do you agree that these transitional arrangements should not be applied to taxis currently licensed as ‘public hire outside Belfast’ or ‘private hire’ since these vehicles are not currently tested as wheelchair accessible?

The Committee recognises that applying the transitional arrangements to taxis that are not currently recognised as a WAV poses significant challenges to the DoE. Under the circumstances Imtac believes there is little alternative to the proposal. However this does raise significant issues about how the DoE proposes to improve the availability and accessibility of WAV’s outside Belfast. The ITP report makes clear that the major impact of the changes will be in the Greater Belfast areas, with little or no improvements in rural areas. The Committee believes the DoE needs to do more to demonstrate how disabled and older people living outside of Belfast will benefit from the current proposals. We have made a number of suggestions under “other issues” in this response that we believe can help deliver this change.

Q4: Do you agree that all wheelchair accessible taxis should comply with the revised ramp specifications from the first vehicle test after the regulations come into force?

Imtac members and other wheelchair users tell us that they do not feel safe using telescopic twin ramps to access and exit vehicles. This issue was clearly identified by the ITP research. A single ramp of the design specified in the proposals is safer for passengers and is a relatively low cost improvement that can be made now to improve access to vehicles. Therefore Imtac supports the proposal that taxis should comply with the ramp specifications from the first vehicle test after the regulations come into force.

Q5: Do you agree with the proposed new wheelchair accessible technical specification? It would be helpful in your answer if you gave reasons and evidence which supports your views, indicating where you disagree with the independent research in this area.

Imtac submitted our thoughts on a new WAV specification as part of the ITP consultation. As a Committee whose members are predominantly disabled and older people our proposed specification reflected a higher level of accessibility than the specification outlined in the consultation. Our specification reflect the higher levels of accessibility identified in the 2007 ECMT report Improving Access to Taxis. However Imtac members

do recognise that the proposed specification is a significant improvement on the existing specification. The Committee also recognises, as clearly indicated in the ITP report that the taxi trade in Northern Ireland is operating in a challenging environment. Under these circumstances we believe that pushing for a higher standard could be counterproductive, potentially forcing existing operators out of providing services and reducing services for disabled people and older people. The Committee therefore supports the proposed new specification in principle. However we do believe that the DoE should always strive to improve standards throughout the taxi industry and as services improve we should look to further improve vehicle standards. Therefore Imtac recommends that the Regulations build in a periodic review of vehicle standards every five years. This periodic review could be linked to the recommendation Imtac made around maximum age limits for taxis.

Whilst we support in principle the proposed new specification, Imtac does have concerns that some of the recommendations from the ITP specification are not included in the consultation. In particular the Committee are disappointed that requirements for handrail provision and interior lighting are not included. Both these issues are important accessibility considerations, particularly for disabled people who are not wheelchair users. We therefore recommend in the strongest terms that these provisions be included in any final specification.

Q6: Do you agree with the assumptions of the impact of the proposed changes? If not, please can you explain why and provide any evidence which supports that view?

Imtac recognises that the DoE must balance improving services for disabled people with not placing onerous requirements on what are in the main large numbers of single owner operators. The Committee recognises that making the Regulations too onerous could potentially disadvantage many disabled people and older people by reducing access to services. We therefore believe that the DoE's approach is in the main correct (subject to a number of issues highlighted above), balancing improving services for passengers with the impact of changes on operators.

Other issues

Whilst Imtac recognises the current consultation is about a future specification for WAV's in Northern Ireland the Committee cannot ignore broader issues raised in the ITP reports. The reports do indicate that

there will be an increase in the number of WAV's as a result of the changes (around 80 additional vehicles) but makes clear that the Greater Belfast area will benefit most from these increases and that rural areas will see no increase. The ITP report also raises significant question marks over whether the DoE's proposals to link wheelchair accessibility to ranks will be effective.

Imtac wants the benefits of changes linked to the Taxis Act to be experienced by disabled people and older people regardless of where they live. The Committee acknowledge that the DoE has limited regulatory levers to influence the numbers of WAV outside major urban areas. However we would like the DoE to explore all potential options including linking WAV provision to operator licensing and measures such as reductions in fees for WAV drivers.

The Committee recognises that many of the levers that could encourage the provision of WAV in areas outside Belfast lie with other Government Departments. ITP recognise this in their reports and highlight a number of potential areas where other Government Departments could support DoE. Many of these issues have been already highlighted in a position paper produced by Imtac in 2008¹. Imtac recognises the challenges presented by Inter-Departmental working but the Committee would welcome the opportunity to discuss with officials from DoE how the Committee could assist in this process. As a first step the Committee could, for example, refresh and republish its position paper.

One issue that was correctly identified by ITP as equally important as vehicle accessibility was driver training. Imtac believes improvements in training are essential in improving services for all disabled people not just wheelchair users. In our response to the previous consultation on driver training and testing Imtac strongly advised the DoE to ensure all drivers, not just drivers of WAV, are required to undertake training relating to disabled people. The Committee also strongly recommended that the DoE involve disabled peoples organisations such as Imtac in developing this training. Given the fundamental importance of the training Imtac would be keen to meet with DoE officials to discuss progress.

Conclusion

¹ [Imtac Position Paper on Taxis](#)

Imtac would like to thank the Department of the Environment for the opportunity to respond to the current consultation. Broadly the Committee is supportive of the DoE's proposals but we have made a number of additional recommendations for inclusion in the final Regulations. The Committee has concerns about wider issues highlighted in our response. We would therefore welcome the opportunity to meet with DoE officials to identify ways Imtac can support the Department to further improve access to taxi services for disabled people and older people.