

Ward: All

Rear-loading wheelchair accessible Hackney Carriages

Report by the Executive Head, Housing Health and Community Safety

1.0 Summary

- 1.1 Worthing Borough Council currently has in place conditions of licence that allow only side access wheelchair accessible hackney carriages to be licensed unless the taxi is equipped with a powered lift at the rear.
- 1.2 Members were requested to consider an application to licence a rear entry wheelchair accessible vehicle as a hackney carriage by amending the conditions currently in place in the council's taxi & private hire handbook.
- 1.3 Members considered this matter in September 2012 and resolved to make the required amendments but deferred their decision so that further information could be provided by officers.
- 1.4 Much of the information members requested is contained in this report the committee is requested to further consider the matter.

2.0 Background

- 2.1 The Council has the power under the Town Police Clauses Act 1847 and Local Government (Miscellaneous Provisions) Act 1976 to make conditions in respect of Hackney Carriages (taxis).
- 2.2 In 2007 the Licensing and Control Committee put in place conditions requiring that:
 - All new taxi licences shall be issued only to vehicles which are capable of carrying at least four passengers, at least one of whom is seated in a wheelchair.
 - The wheelchair shall be loaded only through the side door, unless the taxi is equipped with a powered lift at the rear.
- 2.3 A licensed taxi driver, Mr Trevor Fenton-Goss applied in July 2012 for permission to licence a Peugeot Premier as a taxi in Worthing.
- 2.4 The Taxi and Private Hire Handbook currently states at paragraph 1.2.1.1.2
Wheelchair accessibility - (Amended 21 March 2007)

A licence first issued after 1st January 2004 shall not be issued in respect of a vehicle that cannot carry at least four passengers, one of whom shall be carried whilst seated in a wheelchair.

The wheelchair must be loaded from the side unless the vehicle is fitted with a powered tail-lift. This section shall not apply to vehicles which were licensed on 15th November 2004.

*(The following was suspended indefinitely from 10th June 2009)
With effect from 1st October 2007, any non-wheelchair accessible vehicle which is replaced may only be replaced by a wheelchair accessible vehicle less than three years old.*

- 2.6 When the Committee originally put in place this condition they were acting on the basis of representations from the Spinal Injuries Association, RoSPA and the National Taxi Association. In summary, their objections relate to the necessity of bumping up and down the kerb to get to and from the rear of the vehicle, the risk of being trapped in the vehicle as a result of a rear end collision, the risk of being crushed behind the vehicle if another vehicle runs into the back of the taxi whilst it is being loaded, and the additional rank space taken up by the need to deploy a ramp at the rear of the vehicle.
- 2.7 West Sussex County Council, as the Highway Authority, placed a high level kerb at the end of the main town centre rank in Chapel Road to facilitate the loading of wheelchairs straight into the current side-loading taxis.
- 2.8 Mr Fenton-Goss is seeking to licence, as a Hackney Carriage, a Peugeot Premier Partner van. This vehicle is a purpose built wheelchair accessible vehicle approved to European Community Whole Vehicle Type Approval in the M1 category. A passenger in a wheelchair is loaded via a rear access ramp. There is then space for two additional seated passengers, plus the driver.
- 2.9 The type of vehicle Mr Fenton-Goss is proposing offers operators a relatively inexpensive wheelchair accessible vehicle that appears well built, uses well proven mechanicals and should prove economical to run. However, it has a number of characteristics that members might want to consider. It does not have the seating capability of four passengers if one of them is seated in a wheelchair. In addition luggage space is very limited and may interfere with the passengers. No luggage guard is currently available on the market. In addition unless the wheelchair has a built in head restraint there is no protection to the wheelchair passenger with regard to whiplash injuries in the event of an accident.
- 2.10 Worthing currently allows rear-entry wheelchair accessible private hire vehicles to be licensed but these are pre-booked and are not allowed to ply for hire or use the town's taxi ranks.
- 2.11 This committee considered this matter in September 2012 and resolved that:

The licence conditions regarding the loading of wheelchairs may be removed subject to;

- A risk assessment being carried out on the taxi ranks within the Borough
- A risk assessment being carried out on vehicles applying to be wheelchair accessible.
- An equalities impact assessment being carried out;

that relevant Officers of the Council carry out the necessary steps and that the Risk Assessment and Equality Impact Assessment and be brought back to this Committee in 6 months for members' consideration.

- 2.12 In light of the committees decision a risk assessment of Worthing's taxi ranks and the suitability of rear access vehicles to use these was commissioned with Lesley Dexter, Worthing & Adur Council's Senior Corporate Safety Officer. A copy is provided with appendices at **appendix A**.
- 2.13 Officers requested a formal risk assessment be provided by the Mr Fenton-Goss and the suppliers of the Peugeot Premier. They have not supplied a risk assessment but have provided type approval certificates for members' information. A copy of the information provided is at **appendix B 1-3**
- 2.14 Officers have made enquiries regarding the provision of an Equalities Impact Assessment survey. A similar survey is currently being carried out in Northern Ireland. Officers have been advised that a budget of approx. £12,000 + VAT will be required. A copy of Integrated Transport Planning Ltd.'s estimate is provided at **appendix C**
- 2.15 Worthing Taxi association have made objection to the licensing of rear loading Hackney Carriages. A copy of their representations are provided at **appendix D**

3.0 Proposals

- 3.1 As a result of Mr Fenton-Goss' application members resolved to amend the relevant licence conditions for all future rear access wheelchair accessible vehicle applications subject to further information being provided to this committee.
- 3.2 Mr Fenton-Goss was supported in his application by Allied Vehicles, a major supplier of Peugeot taxis to the trade. They have not provided a risk assessment but they have provided type approval certificates and supporting information.
- 3.3 A risk assessment regarding Worthing's taxi ranks and their suitability for use by wheelchair accessible vehicles has been provided by the council's Senior Corporate Safety Officer. The report recommends that in the case of Hackney vehicles that are adapted for disabled passengers that wheelchair access should be from the side rather than the rear of the vehicle. The basis for this conclusion being:-
- To reduce vehicle movements and in particular the need to reverse vehicles whilst on the taxi ranks to provide additional room for rear access taxis.
 - To reduce the amount of time that a taxi driver is working in the road at the rear of the vehicle

- To reduce the time that a passenger is in the road accessing the vehicle.
- To increase the likelihood of alternative means of escape for passengers from a damaged vehicle

3.5 The Officers of Worthing Taxi Association have written to the Committee requesting their original representation be considered and expressing their view that these vehicles are unsuitable as Hackney Carriages.

3.6 All parties have been invited to attend this meeting to be allowed to make representation or clarify any matters members may need more information on.

4.0 Legal

4.1 Members must consider each licensing issue on its own merits, and in accordance with the principles of natural justice, as well as the provisions of the Local Government (Miscellaneous Provisions) Act 1976. All relevant factors must be taken into account, and all irrelevant factors must be disregarded.

4.2 In determining all licensing matters, the principles of the Human Rights Act 1998 must be taken into consideration and the Convention rights of both individuals and businesses will be given due weight.

4.3 All matters before Committee must be considered in accordance with the Equality Act 2010 and also in accordance with the Council's stated policy on Equalities.

4.4 In accordance with Section 17 of the Crime and Disorder Act 1998 the Council is under a duty to exercise its functions with due regard to the likely effect on, and the need to do all it reasonably can to prevent, crime and disorder in its areas. Possible crime and disorder implications are clearly relevant factors in the consideration of all applications. In giving "due regard" to these possible implications members will consider and weigh up all the information available and any representations made. Including those from the public and the responsible authorities particularly the Police.

4.5 In the case of a refusal to grant a licence an applicant would have a right of appeal against the Committee's decision to the courts which must be exercised within 21 days of being notified of that decision.

5.0 Financial implications

5.1 There are no direct cost implications arising from this application unless members decide that an Equalities Impact Assessment Survey is required. The estimated cost currently stands at £12,000 + Vat.

6.0 Options

6.1 Members may resolve to:

- a) Instruct officers to draft amendments to the hackney carriage licence conditions to allow the licensing of approved rear-loading wheelchair accessible vehicles.
- b) Reiterate the current conditions regarding wheelchair access to hackney carriages and refuse to licence rear loading wheelchair accessible vehicles as hackney carriages.
- c) Defer the decision and instruct officers to commission an Equalities Impact Assessment Survey.

Members should note that if amendments to the licensing conditions are required officers will explore the issues and best practice and a set of new conditions will be referred back to this committee for consideration and approval.

7.0 Recommendation

Members are requested to consider this report and any representations made and determine the issue and application. Members are requested to give reasons for their decision.

Paul Spedding

Executive Head of Health, Housing and Community Safety

Local Government Act 1972

Background Papers:

Town Police Clauses Act 1847

Local Government (Miscellaneous Provisions) Act 1976

Worthing Borough Council's Taxi & Private Hire Handbook

<http://www.worthing.gov.uk/worthings-services/environmentalhealth/licensing/taxilicensing/pdf/57238.en.pdf>

Appendices:

Appendix A - Risk assessment of Worthing's taxi ranks

Appendix B - Type approval certificates & information

Appendix C - Equalities Impact Assessment Survey Estimate

Appendix D - Letters from Worthing Taxi Association

Contact Officer:

Simon Jones

Senior Licensing Officer

01273 263191 or simon.jones@adur-worthing.gov.uk

Schedule of other matters

1.0 Council Priority

1.1 Licensing of taxi and private hire drivers & vehicles is directly related to public safety issues.

2.0 Specific Action Plans

2.1 Matter considered and no issues identified.

3.0 Sustainability Issues

3.1 Matter considered and no issues identified.

4.0 Equality Issues

4.1 Dealt with in the body of the report.

5.0 Community Safety Issues (Section 17)

5.1 The Council is obliged not to issue a Hackney Carriage & Private Hire vehicle licences to any vehicle unless the Council is satisfied that that the vehicle is fit for purpose, suitable and safe to hold that licence. Such vehicles convey the fare-paying public and are expected to comply with all legislative requirements.

6.0 Human Rights Issues

6.1 All applicants have the right to expect that their application will be properly and fairly considered. The public have a right to expect the Council to protect them from unsuitable vehicles being granted a licence.

7.0 Reputation

7.1 The Committee must balance the rights of the individual against the needs of public safety and the potential risk to the Council's reputation if it should transpire that the wrong decision has been taken. Although there is a slight risk to the Council's reputation should the Committee decide not to issue a licence for a particular vehicle the risk is considerably larger if the Committee decides to allow an unsuitable vehicle to have a licence which is subsequently proven not to be safe and proper.

8.0 Consultations

8.1 Matter considered and no issues identified

9.0 Risk Assessment

9.1 Financial - The only consequences identified are those associated with the defence of an appeal, or a judicial review, if an applicant were to pursue an application through the courts following a decision by this committee that the applicant regarded as unsound.

10.0 Health & Safety Issues

10.1 Matter considered within the report.

11.0 Procurement Strategy

11.1 Matter considered and no issues identified.

12.0 Partnership Working

12.1 Matter considered and no issues identified.

Appendix A

Assessment of Risks:

Report into the use of rear access vehicles for Hackney Carriage:

By Senior Corporate Safety Officer

Purpose:

The purpose of this report is to identify the risks associated with the use of rear loading disabled taxis potentially being used for Hackney Carriage hire within the Borough of Worthing.

Definition: Hackney Carriages can be 'flagged down' off the street or from a taxi rank. Private Hire Vehicles must be pre-booked through an operator and does not use the taxi rank system. Rear access vehicles can be used for private hire and are not within the scope of this report.

Background:

At present, side loading disabled taxis are used for Hackney Carriage within the Worthing Borough. A member of the public has raised the issue of allowing rear access disabled vehicles to be used on the Taxi Ranks. Corporate Safety has been asked to assess the risks of using rear access Hackney Carriages on the Worthing Taxi Rank sites.



Photograph 1:
loading vehicle

Example of rear

Worthing Taxi sites description:

This report relates to the following Taxi Ranks situated within Worthing Borough:-

- **Chapel Road**, allocated space for 13 taxis situated in three parts on the east side of Chapel Road
- **Worthing station**, allocated space for 15 taxis situated on the north side of Railway Approach to the east of Worthing Station.
- **West Worthing station**, allocated space for 4 taxis, situated on the north side of Tarring Road, outside the entrance to West Worthing station in the lay-by.
- **Montague Place**, allocated space for 6 taxis.
- **Marine Parade**, allocated space for 3 taxis, east of the pier but only between 22:00 hours and 03:00 each day.
- **Marine Parade** set down and pick up point for taxis at rear of Marks and Spencer

Assessment of risks:

Persons at risk include:

- Taxi Drivers
- Passengers including
 - Wheelchair passengers: Note that there are many different designs of wheelchairs with varying dimensions suitable for people with different disabilities, or degrees of disability and a vehicle which is accessible for one such design may not be suitable for others.
 - Other passengers including those with visual, audible and mobility limitations
- Other vehicle users
- Members of the public

Objective:

There are over 750,000 wheelchair users in the UK. It is recognised that the Council's objective should be to minimise risks to passengers, users and transport staff whilst using the Council's facilities. As such, the following assessment of risks related to using the Taxi Ranks has been undertaken.

Risks identified:

Site specific - Loading space required:

Rear loading vehicles require an additional 3 metres space in order to manoeuvre a wheelchair user into the vehicle using a rear loading ramp. This will have an impact at some taxi ranks where space is at a premium.

- **Chapel Road** – There is usually a space ahead of the premier place where the first taxi can pull ahead in order to make space for the rear ramp to be erected and access gained. However, this will mean that whilst the passenger is being assisted at the rear of the Taxi, taxis in position 2 potentially could be pulling out with other passengers. In addition, this is a bus route and the space ahead of the premier position is often occupied by police or fire service vehicles. The taxi rank is on the edge of two pedestrian precinct areas resulting in a large number of people seeking to cross the road on foot near the taxi rank.
- **Worthing Station** – This taxi rank is both straight and long. Potentially, there is space for rear access disabled taxis.
- **Montague Street** – due to the turning circle of the road and the use of the road by delivery vehicles, it is felt that this road is too busy to accommodate vehicles that may need to manoeuvre in order to acquire additional room for rear access. The taxi rank is on the edge of the pedestrian precinct area.

If the vehicles require manoeuvring, and in particular if there were a need to reverse vehicles in order to accommodate the extra space at the rear of the taxi, there is the

potential for accidents to occur to other members of the public including children and persons with visual or audible impairments. The risk of reversing vehicles injuring members of the public would increase in poor weather conditions or after the hours of darkness when visibility is limited.

Side access / rear access disabled taxis:

It is recognised that disabilities vary widely and that personal preferences will influence how a person wishes to use the various services provided. However, looking at the risks involved, it is preferable for a passenger to gain access to a taxi from the kerb of a taxi rank rather than the road.

A side loading vehicle requires the driver to retrieve the ramp, possibly from the rear of the vehicle, and then attach it to the fixing points at the side door. The example below only has ramp access from the left-hand side of the vehicle; however, in the event of an accident there is a right-hand door that could be utilised in an emergency.

In the event of an accident, a rear access vehicle only has the one means of access / egress from the vehicle, whereas, side loaded vehicles have two doors. If the rear of a vehicle is damaged it may prove difficult to assist a disabled passenger from the damaged vehicle.



Photographs 2 & 3: Ramp being removed from the rear of the vehicle by the driver and placed in position for side loading access from the kerb:

Gradient of ramp from kerb¹:

From the above photographs, it can be shown that the gradient of the ramp increases where a kerb is not used. A pavement or kerb tends to be 15cms / 6" higher so reduces the gradient of the ramp.

This has an effect on the manual handling requirements for the driver assisting the passenger and also the comfort and security of the passenger. Drivers may injure themselves or their passenger by trying to help disabled passengers inexpertly. Assisting a disabled person may require particular skills in lifting or supporting that person to ensure that both the driver and the passenger avoid injury.

Securing the passenger:

Having assisted the passenger into the vehicle, the driver will then need to ensure that the passenger and wheelchair are safely secured. This needs to be completed safely and with the cooperation of the passenger.

Any ramps used will need to be removed and stored away prior to the journey commencing.

The additional time taken to complete these tasks satisfactorily will be several minutes working either to the side or the rear of the vehicle. The driver's safety is increased by reducing the time that the driver is working in the road at the rear of the vehicle.

External Bodies:

The National Taxi Association supported by a number of disabled persons groups have written to licensing authorities asking them to prohibit the use of hackney carriages which are adapted for disabled passengers, where the wheelchair is loaded only from the rear rather than the side of the vehicle. The argument for this approach is that the wheelchair user has to be on the road during loading and unloading and is therefore exposed to risk from traffic. This is seen as being particularly relevant for Hackney Carriages, which of necessity; operate from side loading hackney carriage stands.

It is arguable that different accessibility considerations should apply as between hackney carriage and private hire vehicles in that customers dealing directly with the driver can hire hackney carriages on the spot, whereas private hire vehicles can only be booked through an operator. It is considered particularly important that a disabled person should be able to hire a hackney carriage on the spot with the minimum of delay or inconvenience and having accessible hackney carriage vehicles helps make that possible.

Attached as appendix 2-5 is information regarding this issue from:-

- RADAR, the disability network
- SIA, Spinal Injuries Association
- SATA, Scottish Accessible Transport Alliance
- MDA, Medical Devices Agency

kindly provided by the (NTA) National Taxi Association.

¹ The Determination of Accessible Taxi Requirements undertaken by Mobility and Inclusion Unit, Department of Transport, June 2004

Conclusions:

It is difficult to be too specific in this report as there are many variables regarding the types of vehicles being used, the various means of access and egress, the considerations of transport safety within the vehicle, skills and physical ability of the driver and the wide spectrum of disabilities that need to be catered for.

Disabilities requiring wheelchair assistance vary from an individual who would prefer to sit in a salon car with the wheelchair folded up, through to passengers who are seated on their wheelchair during the journey and finally motorised chairs. The taxi driver is obliged to assist with loading the wheelchair and occupant to the best of his or her ability. At this point the taxi driver secures the passenger using a variety of seat belts. It should be noted that there could be a complex assortment of manufacturer's instructions for different wheelchairs and vehicles. The driver needs to ensure that he has secured the wheelchair and passenger satisfactorily before proceeding on his journey.

Recommendations:

It is recommended that in the case of Hackney vehicles that are adapted for disabled passengers that wheelchair access should be from the side rather than the rear of the vehicle.

The basis for this conclusion is:-

1. To reduce vehicle movements and in particular the need to reverse vehicles whilst on the Taxi Ranks to provide additional room for rear access taxis.
2. To reduce the amount of time that a taxi driver is working in the road at the rear of the vehicle
3. To reduce the time that a passenger is in the road accessing the vehicle.
4. To increase the likelihood of alternative means of escape for passengers from a damaged vehicle

Case Law:

Hartlepool, 2005 – The operator of a dial-a-ride service was prosecuted for negligence following a fatal incident where the passenger sustained fatal head injuries in a fall from rear tail lift of a welfare bus.

A 14 year old girl was tragically killed in Birmingham in 2009 after their wheelchair tipped over after being loaded incorrectly.

Staffordshire County Council were fined £83,000 and costs in 2008 after a 90 year old woman was fatally injured when her wheelchair rolled off the back of a minibus

It should be noted that there is currently a Law Commission Green Paper - Reforming the law of taxi and private hire services.

http://lawcommission.justice.gov.uk/docs/cp203_taxi-and-private-hire-services_summary.pdf

A final report with a draft Bill will be published in November 2013. It will be for Parliament to decide whether any elements of the proposals will be made into law.

L. Dexter

Date: 7th January 2013

Risk assessment Report Appendix 1 - Photographs:



Worthing Station: Good disabled access from the station to the taxi rank. The photograph below was taken at 10am shows approximately eight taxis queuing.



Chapel Road, Worthing

Short taxi rank on a bus route adjacent to a pedestrian area.



Montague Street, Worthing:

Licensing and Control Committee A
CommitteeDate

The curve of the road and confined space makes this taxi rank unsuitable for consideration for rear access disabled taxi vehicles.



Risk assessment Report Appendix 2 – RADAR Policy



Policy for accessible taxi and private hire vehicles

RADAR believes every Local Authority should have:

1. A policy and strategy for delivering affordable and accessible taxis and private hire vehicles
2. A policy to allow disabled people to use taxis and private hire vehicles
3. At least 50% vehicle fleet accessibility
4. A driver training scheme for taxi and private hire vehicle drivers

1. Policy and Strategy

- a. Local Authorities should have a policy to improve the mobility of disabled people by the use of taxis and private hire vehicles
- b. Local Authorities should have a strategy for carrying out the policy by various means and within a timeframe
- c. These policies should be detailed in the Local Authority's Disability Equality Scheme

2. Affordability

- a. Local Authorities should have a scheme whereby disabled residents unable to use bus services routinely (i.e. a concessionary bus pass may also be held but is not always usable, such as when the holder has luggage, travels after dark etc.) can use taxis affordably. This policy should include:
 - i. Allowance of at least two single trips a day
 - ii. At least half fare discount
 - iii. Companions allowed at no extra fare

3. Vehicle accessibility

- a. All new and transferred licences for Hackney Carriages should be for side-loading wheelchair accessible vehicles with M1 ECWVTA and include features to cater for those passengers with reduced mobility, vision and hearing
- b. All new licences for private hire vehicles should be required to have an approved swivel seat fitted

4. Driver training

- a. Drivers should be trained in disability awareness, communication and use of equipment
- b. Training should be taken as part of the licence requirements on first issue and renewal
- c. It is recommended that driver training is mandatory. However, when introducing this, Local Authorities should work in partnership with other Local Authority areas in the region to ensure standardisation



Spinal Injuries Association Taxi Charter

In its Campaigning for Change Manifesto 2009 – 2011, the Spinal Injuries Association (SIA) addresses the challenges that public transport and, in particular, taxis, present to those with spinal cord injuries (SCI).

Section 36 of the Disability Discrimination Act 1995 (DDA) introduces legislation to make taxis accessible for disabled people. However, this is still to be enacted by government. The delay in its implementation appears to be the technical specifications which define a “wheelchair accessible taxi” and the cost to the taxi trade of providing these vehicles.

In this document SIA puts forward an “**Accessible Taxi Charter**” to address the challenges currently facing those with SCI and other disabled taxi passengers in the U.K.

...because life needn't stop when you're paralysed.

The Present Problems

- Vehicle types used for taxis differ across the country.
- The number and availability of wheelchair accessible taxis differ from area to area.
- Often drivers have no disability awareness training or are unaware how to operate equipment like ramps and clamps.
- This equipment is often in poor working condition or has been mislaid and is not with the vehicle.
- Wheelchair accessible vehicles licensed by local authorities may not be of a suitable specification.
- There is no standardised complaints procedure or enforcement for bad service.

Desired Outcomes

SIA will be pressing for improved and compulsory driver training which will ensure:

- Drivers better understand the needs of their disabled passengers.
- Drivers are able to operate and maintain equipment properly.

SIA will also be pressing that via the licensing system:

- All vehicles working from official taxi ranks meet a minimum standard that enables it to carry a passenger safely in their wheelchair.
- Wheelchair accessible vehicles are provided with side access off the kerb side to provide direct access to/from the pavement.
- The built environment which is used for taxi ranks is suitable to allow easy and safe access for wheelchair users to the taxi, such as raised platforms at taxi ranks.
- There are sufficient wheelchair accessible taxis working away from a taxi rank to ensure that disabled people can obtain a vehicle that meets their needs.
- The level of accessible vehicles should be greater than those not capable of carrying a wheelchair user seated in their wheelchair.
- Taxi operators have a duty to provide an equal service for disabled and non disabled people.
- There is a standardised, enforced complaints procedure across all local authority areas.
- Taxi operators refusing to provide a service to disabled people are suitably punished to deter repeat offences.

CHARTER

SIA believes that these recommendations will improve access for all disabled taxi passengers.

- All taxis (hackney carriages) should become side loading wheelchair accessible vehicles and cater for every disabled person.
 - All taxi drivers should be thoroughly trained in disability awareness and the competent use of the facilities in their vehicles.
 - The single specification for accessible taxis must be demonstrably safe in all respects and converted vehicles should not be tested to a lower safety standard than that used by saloon cars.
 - Standards should be deliverable in the short term by manufacturers and converters and also be affordable so as to ensure a quick delivery of the DDA requirements.
 - Accessibility standards should enable wheelchair users to access an integrated transport system, allowing an uninterrupted journey on trains, buses and taxis.
 - Authorities should ensure street planning and rank provision meet the need of disabled passengers.
 - Licensing authorities must ensure that drivers of accessible taxis do not discriminate against disabled people under the DDA.
1. Under the proposals of the DDA, it was envisaged that all taxis (hackney carriages) should become wheelchair accessible and meet a predetermined specification. It was envisaged that the trade would be given a ten year period to achieve this and SIA believes that this must commence as soon as possible.
 2. The Department for Transport has suggested that a mixed fleet of saloon cars and wheelchairs accessible taxis within the hackney carriage fleet is an option for meeting the needs of wheelchair users. SIA does not believe that this is practical or desirable and will seek to show why in this charter.
 3. SIA believes it is imperative that all taxi drivers are required to be trained in disability awareness and assisting disabled passengers safely into and out of their taxis. This is a major issue both in terms of safety for disabled passengers and the willingness of drivers to undertake journeys with wheelchair users.
 4. If a taxi driver refuses to take a wheelchair passenger then this should be treated as an offence under the DDA. SIA believes that if all drivers are properly trained then such situations need never arise.

Critical Issues

The huge variety of accessible taxis in the marketplace can present disabled passengers with a poor, and in some circumstances unsafe, choice of vehicle. To address this issue SIA proposes the following:

Safety

- The European Community provides a “Type approval” system for the production of all cars, called “European Whole Vehicle Type Approval”. Vehicles that are converted to accommodate wheelchair users can currently be tested to Single Vehicle Type Approval after conversion, which is a national standard. SIA does not believe that this is acceptable for a public service taxi. All such converted taxis should be re-tested to fully European Whole Vehicle Type Approval.
- SIA believes that side loading should be the standard adopted as the safest method of accessing taxis from taxi ranks and the street. The advantages of side loading are that:
 - It is safer to keep wheelchair users on the pavement than to put them in the road, particularly facing away from on coming traffic.
 - Taxi drivers may not be familiar with lowering a wheelchair over a kerb which can present dangers to the passenger. Similarly, passengers using electric wheelchairs may find it impossible to go down over a kerb. If access is from the pavement then these issues do not arise.
 - Being seated in the centre of a taxi is likely to be safer than being seated at the rear of the vehicle. The majority of accessible taxis have centre divisions which would provide passenger protection in the event of a side impact. However, most rear loading taxis leave the wheelchair passenger at the back of the vehicle in the rear impact zone.
 - The need to have an alternative exit in the event of an accident is paramount. In an emergency a side loading vehicle will offer the passenger the opportunity to exit the vehicle from an alternative exit. In the case of a rear loading vehicle where the rear doors or tailgate are damaged, this would be impossible. This is not acceptable for a public service vehicle.
- An agreed Government specification will deliver additional safety to passengers. Local authorities may currently license accessible vehicles to a range of technical specifications which may be inappropriate and potentially dangerous.

The Right Specification

- One of the critical concerns of disabled people is the need for an integrated transport system so that journeys can be completed without disruption. The taxi is unique in delivering door to door transport and therefore needs, at the very least, to provide the same accessibility standards provided by buses and trains under the DDA.
 - The reference wheelchair measuring 1200 x 1350 x 700mm formed the basis of accessibility standards for buses and trains and SIA sees no reason not to adopt that same standard within the rear cabin of a taxi.
 - SIA understands that there are already many conversions in the marketplace that meet this standard. This demonstrates not only that this specification is achievable by converters, but that it is also presumably affordable by the taxi trade.
 - Accessibility for ambulant disabled passengers is a key issue. At present the purpose built taxi provides a swivel seat and demountable step on every vehicle. If this were replicated by converters it would address the perceived difficulty by ambulant disabled passengers of using accessible taxis.
 - Affordability is clearly a key issue for the taxi trade. However, there are currently many cities with satisfactory accessibility standards for their vehicles. It seems logical that if this specification can be afforded in these towns and cities then it should be possible across the country. Rural areas may present more of a challenge to the trade as income may be lower, but SIA understands that drivers in these areas commonly purchase second hand vehicles and would therefore be likely to purchase second hand accessible vehicles when the DDA requirements are introduced.

The Mixed Fleet Issue

The Department for Transport has suggested that a mixed fleet of saloon cars and wheelchair accessible taxis may meet the needs of disabled passengers. SIA does not agree with this proposal for the following reasons:

- Under the DDA the choice of saloon car was envisaged as being provided by private hire. The taxi was instead seen to provide instant accessibility on the rank as part of an integrated transport system. This ensured that a wheelchair user was in no way disadvantaged when taking a taxi from the rank.
- It is not clear how a local authority can decide who will drive an accessible vehicle and who will drive a saloon car. Accessible taxis are of necessity more expensive to operate and this is likely to lead those driving accessible vehicles to revert to saloon cars over time. SIA does not want to see 100 per cent accessible taxi fleets gradually erode away. Any solution to this problem is likely to require new legislation, and will further delay implementation of the DDA.
- To overcome the concerns of those calling for the mixed fleet, the specification of any future taxi should take into account the needs of wheelchair users, ambulant disabled passengers, the elderly and those with other requirements.

Driver Training

SIA believes that all taxi drivers should be trained in dealing with disabled passengers. SIA therefore recommends that:

- All drivers must undertake disability awareness training as a condition of their licensing.
- All drivers must demonstrate that they have full working knowledge of the equipment fitted to their taxi. This should include the ability to safely load and secure a wheelchair and assist passengers with other mobility requirements.

Local Authorities

Local authorities could ensure that accessibility to taxis is made easier for disabled passengers in some very simple ways. The following key principles should be a requirement on all authorities.

- Taxis on taxi ranks should always be accessible from the near side.
- Ranks should have raised pavements at the point of entry so as to minimise ramp angles and step height.
- Cover should be provided for passengers at ranks where waiting is a frequent occurrence.
- Rank availability should take into account the needs of disabled passengers. For example, ensuring that hospitals have accessible taxi ranks near to the main entrance.

SIA would also like to see the introduction of a standardised, enforced complaints procedure across all local authority areas. This will ensure that disabled people can be confident that their complaints will be handled effectively. It would also ensure that offending taxi operators are suitably punished and that disability discrimination is taken seriously by the industry.

Timing

The DDA envisaged a ten year changeover to the new specification when agreed. Given that the specification has yet to be decided, SIA urges that:

- The new specification be agreed as soon as possible based around vehicles that are currently in the marketplace and can meet the requirements outlined above with limited improvements.
- All vehicles that do not meet the final specification should be required to do so when the owner next changes the vehicle. This will prevent saloon cars being kept on the road and changed only at the last possible date.
- All authorities should only issue new licences for wheelchair accessible taxis that meet the agreed standard.

SIA anticipates that this Charter will act as a benchmark for Government, Licensing Authorities, manufacturers and converters and members of the taxi trade. Please help us to deliver it as soon as possible.

For more information please contact

Spinal Injuries Association
SIA House
2 Trueman Place
Oldbrook
Milton Keynes MK6 2HH

Tel 0845 678 6633
Fax 0845 070 6911
Email cfc@spinal.co.uk
Web www.spinal.co.uk

Registered Charity No 1054097
Charitable Company No 3175203

Campaign for affordable and accessible taxi and private hire vehicles

Policy outline

Objects

1. every local authority should have a **policy and strategy** for delivering affordable and accessible taxis and private hire cars
2. every local authority should have a **fare concession scheme** for disabled people to use taxis and private hire cars
3. every local authority should have *at least* **50% vehicle fleet accessibility**
4. every local authority should have a **driver training** scheme for taxi and private hire car drivers

Details

1. Policy and strategy

- * a policy to improve the mobility of disabled people by the use of taxis and private hire cars
- * a strategy for carrying out the policy by various means and within a timeframe

2. Fare concession scheme

- * membership with 'Taxicard' available free on application for disabled residents unable to use bus services routinely (ie a concessionary bus pass may also be held but is not always usable when the holder has luggage, travels after dark, etc.)
- * allowance of at least two single trips a day
- * *at least* half fare discount
- * companions allowed at no extra fare

3. Vehicle accessibility

- * all new and transferred licenses for taxis (Hackney Carriages) should be for side-loading wheelchair accessible vehicles with M1 ECWVTA and include features to cater for those passenger with reduced mobility, vision and hearing
- * all new licenses for private hire cars should require them to have an approved swivel seat fitted.

It is anticipated that under the DDA all taxis will be required to be fully accessible to an agreed specification by a due date.

4. Driver training

- * training in disability awareness, communication and use of equipment
- * taken as part of the licence requirements on first issue and renewal

January 2006

Appendix B1

From: Simon Guilliat [simon.guiliatt@alliedvehicles.co.uk]

Sent: 12 February 2013 11:51

To: Simon Jones

Subject: Peugeot Premier ECWVTA M1 Certificate

Attachments: Horizon & Premier (Tepee) Approval Certificate e8_2007_46_0005_00 (1).pdf; Premier_Cab Direct_Web.pdf

Hello Simon

As promised i have attached a copy of the Peugeot Premier's M1 ECWVTA Certificate, all passenger vehicles in the the UK have to have one of these certificates when they leave the factory, as we convert this vehicle to a wheelchair access vehicle we then need to have it re tested ie:- seating, wheelchair ramp, seatbelt anchorages etc. The M1 certificate covers all of this.

Here are a couple of links to explain in more detail:-

www.dft.gov.uk/vca/vehicletype/faqs-for-ecwvta.aspx<http://www.bing.com/search?q=ecwvta&src=IE-SearchBox&Form=IE8SRC>

www.doeni.gov.uk/roadsafety/index/policy_development/policy_ecwvta.htm

The M1 certificate is the highest level of certification of vehicles on the road in Europe today, the Peugeot Premier/Horizon (Mobility) conversion is the most popular rear wheelchair access vehicle on the UK's roads today, we supply the motability scheme with approx 200 of these vehicles a month and have done since 2010. It is also passed as a Hackney taxi in places such as Brighton, Cardiff, Bristol, Leeds, Bradford, Slough, Hull, North Norfolk, Louth, Wisbech, March, Bedford, Leamington Spa, Stratford Upon Avon, Nuneaton, Windsor and Maidenhead, Daventry and Rugby to name just a few.

Due to the rear floor being lower than standard the ramp angle is much less than previous rear access vehicles and it also means that the ramp only sticks out from the rear of the vehicle by just 1 meter. Also the wheelchair passenger is secured by a 4 point system as opposed to a 2 point system in a side access vehicle.

Simon Guilliat
Market Development Manager
Allied Vehicles
230 Balmore Road
Glasgow
G22 6LJ

T: 0141 336 1151

M: 07875565282

www.timeforchoice.co.uk

www.alliedmobility.com

www.cabdirect.com

www.alliedelectric.co.uk

Appendix B1

Euro 5

Premier™ from Peugeot and Cab Direct



Premier™
From Peugeot and Cab Direct



The Peugeot Premier™



**58.9
MPG***

Economy

Specially adapted from the Peugeot Partner, the Premier™, available exclusively from Cab Direct, combines all you need in a modern day cab with truly great economy. Powered by Peugeot's economical new Euro 5 HDi diesel engine, Premier™ boasts excellent fuel efficiency - an impressive 58.9mpg on the combined cycle - making it one of the most cost effective taxis on the market. Combine this with Premier's low price tag and you'll be surprised how affordable your new cab can be.

Versatility

Where the Peugeot Premier™ excels is in its versatility. It makes superb use of space with numerous handy storage areas and the cargo load carrying is second to none thanks to Premier's new FlatFold™ ramp which folds flat to the floor, allowing you to make full use of the large luggage area. For the first time Premier™ is also now available with a choice of standard manual or automatic EGC transmission, with no clutch required.

*Official VCA fuel consumption figure, combined cycle (auto).

3

Comfort and Driveability



**Manual or
auto**



**Euro 5
diesel engine**

Comfort

Comfort and convenience are high on the list of priorities for the modern day driver - thankfully the Peugeot Premier™ has both in abundance. Features such as the height adjustable driver's seat with armrest, radio/ MP3 compatible CD player with remote controls, electric front windows and innovative storage solutions make the Premier™ a pleasure to drive.

Driveability

Quick and highly economical Peugeot's innovative Euro 5 HDi 92 diesel engine uses an aluminium block to reduce weight and to help towards better weight distribution, ensuring you a fast response and superb poise on the road. Plus, with the choice of manual or automatic transmission, Premier™ makes the perfect taxi partner, whatever your taste. With effortless handling and maximum comfort for drivers and passengers alike you're sure to enjoy a relaxing trip every fare.

Space and Accessibility

PREMIER



Bags of Space

Today's passengers often come with plenty of luggage. That's why Premier's new FlatFold™ wheelchair access ramp has been designed to be stowed flat to the vehicle's floor when not in use. This allows you to take full advantage of the huge luggage area, ensuring space will never be a problem again. Add to this Premier's roomy interior and both driver and passengers can travel in perfect comfort, with bags of space for all

Wheelchair Access

Premier's lightweight FlatFold™ rear access ramp has been specially adapted to offer quick and easy wheelchair access without compromising on passenger or luggage carrying capacity. The vehicle also features a lowered floor providing an easy ramp gradient to assist wheelchair entry and exit. Securing the wheelchair passenger couldn't be simpler either thanks to Premier's four-point wheelchair restraint system and full lap and diagonal inertia seat belts.

5

Technical Specification and Colour Choice

	1.6 HDI Manual	1.6 HDI Auto
Engine		
Emission standard	Euro 5	
Cubic capacity	1560	
Max. power bhp (kW) @ rpm	92 (68) @ 4000	
Max. torque lb ft (kW) @ rpm	158 (230) @ 1750	
Fuel	Diesel	
Tyres		
Size	205/65 R15	
Fuel Tank		
Capacity (litres)	55	
Transmission		
Number of gears	5 speed manual	6 speed EGC*
Fuel Consumption (MPG)		
Urban drive cycle	45.6	47.1
Extra urban drive cycle	58.9	60.9
Combined drive cycle	53.3	58.9
Emissions		
Carbon dioxide (g/Km)	139	125
Suspension		
Front	Pseudo-Macpherson with lower wishbone struts coil springs & anti-roll bar	
Rear	Rear deformable axle with coil springs and anti-roll bar	

Brakes		
Ventilated front disc		✓
Rear drum		✓
Performance (driver only)		
Max speed (mph)		100
Acceleration 0-60 mph (sec)		14.3
Dimensions (mm)		
Length		4380
Width – including door mirrors		2112
Height		1805
Wheelbase		2728
Front overhang		925
Rear overhang		727
Maximum wheelchair user height		1430
Maximum wheelchair user width		750
Maximum wheelchair user length		1300
Ramp width		720
Ramp length		1000
Weight (kg)		
Gross vehicle weight		2070
Kerb weight		1624
Gross train weight		3010

* EGC - Electronically controlled gearbox for smoother gear changes with no clutch.

Solid



Black

Bianca White

Metallic optional



Aluminium

Iron Gray

Moon dust

Amber Red

Willow Gray

Hyacinth Blue

Features and Options

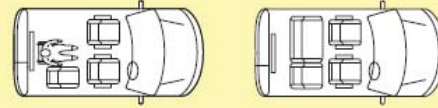


Model	S 1.6 HDI 92	SE 1.6 HDI 92
Taxi Features		
Professional LED high visibility for hire sign	•	✓
Taxi meter	•	✓
Ultraseal™ tyre life extender	•	•
Rear interior lighting	•	•
Supagard professional interior and exterior protection	•	•
Style Features		
Twin sliding side doors	✓	✓
One piece tailgate	✓	✓
Body coloured bumpers, mirrors & handles	✓	✓
Metallic paint	•	•
16" alloy wheels	•	•
Safety and Security		
ABS including EBA & EBD	✓	✓
Front fog lights	✓	✓
Rear fog and reversing lights	✓	✓
Driver airbag	✓	✓
Front passenger airbag	✓	✓
3-point seat belts	✓	✓
Remote central locking and deadlocks	✓	✓
Comfort and Convenience		
Electrically adjustable, heated door mirrors	✓	✓
Variable power assisted steering	✓	✓
60/40 split folding rear seats	✓	✓
Height adjustable front head restraints	✓	✓
Electric front windows	✓	✓
Air conditioning	•	✓
Height adjustable drivers seat	✓	✓
Reach adjustable steering wheel	✓	✓
Floor mats	•	✓
Tom Tom sat nav	•	•
Audio		
Radio/MP3 compatible CD player with remote	✓	✓

Key ✓ - Included • - optional

SEATING OPTIONS

Your Premier™ can accommodate driver wheelchair passenger and two seated passengers or driver and four seated passengers.



Access features:

- New FlatFold™ ramp
- Lowered floor for optimum accessibility
- High quality wheelchair restraints
- Lap and diagonal seat belts for seated wheelchair passengers

For your reassurance each vehicles comes with:

- 2 year Peugeot unlimited mileage warranty
- 1 year Peugeot roadside assistance
- 3 year paint warranty

For further information or to arrange a free home demonstration call our friendly customer service team today or visit our website.

0800 916 3061

www.cabdirect.com



Appendix B2 –

Information regarding VCA is the designated UK Vehicle Type Approval authority

With more than 30 years experience VCA supports industry by providing internationally recognised testing and certification for vehicles, their systems and components. A leading Management Systems Certification body, VCA also provides certification to ISO 9001, ISO TS 16949, ISO 14001, OHSAS 18001, Acorn (a phased approach to environmental certification), EMAS and ISO 50001 (Energy Management Certification).

Some pointers on the new revised framework directive - 2007/46/EC

Who will be affected by ECWVTA?

The majority of business affected will be the manufacturers and converters of commercial vehicles, namely Buses and Coaches, Goods Vehicles and Trailers. For a more comprehensive description of the vehicles affected please refer to the vehicle category definitions within the directive.

Two business sectors that will be particularly affected are body builders, i.e. those that take a chassis and build or modify a body of any description on it before selling it to the customer, and manufacturers of commercial vehicles imported from inside and outside Europe.

What are the Enforcement dates for the new Directive?

Categories	New type - Optional	New type - Mandatory	Existing type - Mandatory
M1	NA	29 April 2009	NA
M1 Special Purpose	29 April 2009	29 April 2011	29 April 2012
N1 - Incomplete & Complete	29 April 2009	29 October 2010	29 October 2011
N1 - Completed	29 April 2009	29 October 2011	29 April 2013
N2, N3, O1, O2, O3, O4 - Incomplete & Complete	29 April 2009	29 October 2010	29 October 2012
M2 & M3 - Incomplete & Complete	29 April 2009	29 April 2009 (1)	29 October 2010
N1, N2, N3, M2, M3, O1, O2, O3, O4 - Special Purpose	29 April 2009	29 October 2012	29 October 2014
N2, N3 - Completed	29 April 2009	29 October 2012	29 October 2014
M2, M3 - Completed	29 April 2009	29 April 2010 (1)	29 October 2011
O1, O2, O3, O4 - Completed	29 April 2009	29 October 2011	29 October 2013

Note (1): National approval available for a further 12 months subject to Art 45(4)

70/156/EEC (the old Framework Directive) is repealed with effect from 29/4/09. The first stages of application start to work in 2009, with voluntary whole vehicle approvals being available for all types of vehicle at that time. Mandatory Approval will follow over the next few years, starting with buses and coaches (on the same date in 2009), with Whole Vehicle Approval for trailers bringing up the rear in 2013. The table from Annex 19 of the Directive explains in full:

Why do I need ECWVTA?

If you are planning to make or import vehicles for sale in the UK or any other member state, you must have the relevant approval. Without it, vehicles cannot use the roads. In other words no approval, no sale!

What are the benefits to me of ECWVTA?

A key objective of ECWVTA is the harmonisation of the European market. No member state can refuse to register or permit the sale and entry into service of new vehicles (on the grounds of construction) if they are accompanied by a valid certificate of conformity (COC).

A certificate of conformity is, in effect, a statement by the manufacturer that the vehicle conforms to the relevant EC type-approval. Member states cannot refuse to register vehicles for use on their roads if they comply with a properly issued type-approval.

Why do I need to think about ECWVTA Now?

ECWVTA may affect your design, manufacturing and administrative processes.

What do I need for Whole Vehicle Type Approval?

To achieve type-approval for a new vehicle you will need to:

- Consider the design and construction of your vehicle to ensure that all the relevant components comply; these are listed in the Directive.
- Make certain you are working from the most up-to-date version of the Directive as it is revised from time to time to include new standards
- Apply for type-approval. This requires:
 - A thorough examination of your pre-production vehicles (including some destructive testing where appropriate) to ensure that the vehicle meets rigorous safety and environment standards - not a quick or cheap process.
 - Your production process to be subjected to a Conformity of Production Assessment. You will need to provide detailed documentation of the production process to demonstrate that all vehicles of the same type manufactured following the process will conform to the type approved specification.

Once type-approval has been awarded you, as the manufacturer, will be solely responsible for ensuring the conformity of production (COP) for the period for which the approval is valid. You will then be able to issue a Certificate of Conformity for each vehicle of that type that you produce.

Ensuring Continuous Conformity

After approval has been given, the UK automotive approval authority must verify that the production arrangements of the manufacturer continue to be adequate. Verification must

be carried out in accordance with certain procedures set out in the directive, and where appropriate, with the specific provisions of the separate directives.

Impact on Resources and Business Processes

To meet the new challenges presented by ECWVTA you may need to review your staff and financial resources to determine whether you need to bring in additional skills and how much more compliance may cost.

What if I only sell in the UK?

The UK Government realises that there is a significant number of small to medium businesses throughout the UK that build vehicles in small volumes or on an individual basis that are not for export to the European market and therefore the wider market benefits of ECWVTA do not apply. In addition, a number of national manufactures do not produce sufficient volumes of vehicles to make it cost effective to adopt ECWVTA if it were the only option. The Government has therefore agreed in principle that there should be national schemes for small series type approval (SSTA), which has a limit on the number of vehicles of a type that can be sold each year, and individual vehicle approval (IVA).

The national schemes maintain the same technical standards as defined in the Directive, but aim to keep the cost of compliance affordable. This will be achieved by having a less onerous approach to proof of compliance and documentation management and where appropriate proposing alternative technical requirements.

A vehicle that meets UK national approval will not automatically be accepted for sale elsewhere in Europe. You will have to apply to the type-approval authority in the relevant member state, and they will decide whether the type-approval meets their national requirements.

Do I have a say in how the national schemes are developed?

Yes. The DfT will be going out to statutory consultation and this will give you an opportunity to comment on the proposals for the national schemes. Details of when the consultation will take place will be posted on the DfT web site (www.dft.gov.uk). Alternatively you can register your interest in taking part by e-mailing your contact details to ecwvtaconsult@dft.gsi.gov.uk .

Appendix B3

Peugeot Premier's M1 ECWVA Certificate



ČESKÁ REPUBLIKA / CZECH REPUBLIC
MINISTERSTVO DOPRAVY / MINISTRY OF TRANSPORT
nábřeží Ludvíka Svobody 12
P. O. BOX 9
110 15 PRAHA 1

CERTIFIKÁT ES SCHVÁLENÍ TYPU / EC TYPE-APPROVAL CERTIFICATE

Sdělení o: ⁽¹⁾
Communication concerning the: ⁽¹⁾

- ES schválení typu
- EC type-approval
- rozšíření ES schválení typu
- extension of EC type-approval
- odmítnutí ES schválení typu
- refusal of EC type-approval
- odejmutí ES schválení typu
- withdrawal of EC type-approval

typu: ⁽²⁾
of a type of: ⁽²⁾

úplného vozidla
complete vehicle

dokončeného vozidla
completed vehicle

nedokončeného vozidla
incomplete vehicle

vozidla s úplnými i nedokončenými variantami
vehicle with complete and incomplete variants

vozidla s dokončenými i nedokončenými variantami
vehicle with completed and incomplete variants



**z hlediska směrnice 2007/46/ES naposledy pozměněné nařízením Komise (ES) č. 661/2009
with regard to Directive 2007/46/EC
as last amended by Commission Regulation (EC) No. 661/2009
(schvalování typu motorových vozidel / type-approval of motor vehicles)**

Číslo ES schválení typu:
EC type-approval number: **e8*2007/46*0005*00**

Důvod rozšíření:
Reason for extension: **N/A**

ČÁST I / SECTION I

0.1	Značka (obchodní název výrobce): Make (trade name of manufacturer):	API CZ
0.2	Typ: Type:	7*****
0.2.1	Obchodní název (názvy): ⁽³⁾ Commercial name(s): ⁽³⁾	Peugeot Partner API Horizon S Horizon Urban Premier SE 90 Horizon Urban AC Premier S A/C Horizon S AC Premier S
0.3	Způsob označení typu, je-li na vozidle vyznačen: Means of identification of type, if marked on the vehicle:	4. místo ve VIN kódu a výrobní číslo API CZ Position of the VIN code and serial number of API CZ
0.3.1	Umístění tohoto označení: Location of that marking:	Ve VIN, na štítku výrobce a na identifikačním štítku na rampě At the VIN as well as on the manufacturer's plate and on the identification plate on the ramp
0.4	Kategorie vozidla: Category of vehicle:	M1

- 0.5 Jméno a adresa výrobce úplného vozidla⁽¹⁾:
Name and address of manufacturer of the complete vehicle⁽¹⁾: N/A
- Jméno a adresa výrobce základního vozidla⁽¹⁾:
Name and address of manufacturer of the base vehicle⁽¹⁾: **Automobiles PEUGEOT
75, avenue de la Grande Armée
F-75116 Paris, France**
- Jméno a adresa výrobce posledního stupně výroby nedokončeného vozidla⁽¹⁾:
Name and address of manufacturer of the latest built stage of the incomplete vehicle⁽¹⁾: N/A
- Jméno a adresa výrobce dokončeného vozidla⁽¹⁾:
Name and address of manufacturer of the completed vehicle⁽¹⁾: **API CZ s.r.o.
Slapy 136
391 76 Slapy u Tábora
Czech Republic**
- 0.8 Jméno a adresa montážního závodu (závodů):
Name(s) and address(es) of assembly plant(s): **API CZ s.r.o.
Slapy 136
391 76 Slapy u Tábora
Czech Republic**
- Allied Vehicles Ltd.
230 Balmore Road
G22 6LJ Glasgow
United Kingdom**
- 0.9 Jméno a adresa zástupce výrobce (pokud existuje):
Name and address of the manufacturer's representative (if any): N/A

ČÁST II / SECTION II

Níže podepsaný tímto osvědčuje správnost výrobcova popisu v připojeném informačním dokumentu o výše uvedeném vozidle (vozidlech) (vzorcích vybraných ES schvalovacím orgánem a předložených výrobcem jako prototypy typu vozidla) a použitelnost připojených výsledků zkoušek pro tento typ vozidla.

The undersigned hereby certifies the accuracy of the manufacturer's description in the attached information document of the vehicle(s) described above ((a) sample(s) having been selected by the EC type-approval authority and submitted by the manufacturer as prototype(s) of the vehicle type) and that the attached test results are applicable to the vehicle type.

1. Pro úplná a dokončená vozidla/varianty⁽¹⁾:
For complete and completed vehicles/variants⁽¹⁾:
Typ vozidla ~~splňuje~~ ~~nesplňuje~~⁽¹⁾ technické požadavky všech souvisejících regulačních aktů uvedených v ~~příloze IV a příloze XI~~⁽¹⁾ směrnice 2007/46/ES.
The vehicle type ~~meets~~ ~~does not meet~~⁽¹⁾ the technical requirements of all the relevant regulatory acts as prescribed in ~~Annex IV and Annex XI~~⁽¹⁾ to Directive 2007/46/EC.
2. Pro nedokončená vozidla/varianty⁽¹⁾:
For incomplete vehicles/variants⁽¹⁾: N/A
Typ vozidla ~~splňuje~~ ~~nesplňuje~~⁽¹⁾ technické požadavky regulačních aktů uvedených v tabulce na straně 2.
The vehicle type ~~meets~~ ~~does not meet~~⁽¹⁾ the technical requirements of the regulatory acts listed in the table on side 2.

3. Schválení typu uděleno / ~~odmítnuto / odejmuto~~⁽¹⁾.
The approval is granted / ~~refused / withdrawn~~⁽¹⁾.
4. Schválení typu uděleno podle článku 20 a jeho platnost je proto omezena.
The approval is granted in accordance with Article 20 and its validity is therefore limited.
of the approval is thus limited.

Praha

(Místo)
(Place)

Josef Pokorný

(Podpis)
(Signature)

1 March 2010

(Datum)
(Date)

Přílohy:
Attachments:

Schvalovací dokumentace
Information folder

Výsledky zkoušek
Test results

Informační složka výrobce
Manufacturer's information folder

Viz technický protokol 121103 – 09 – TAC
See Technical Report 121103 – 09 – TAC

Jméno (jména) a podpisový vzor (vzory) osob oprávněných podepisovat prohlášení o shodě a jejich postavení v podniku
Name(s) and specimen(s) of the signature(s) of the person(s) authorised to sign certificates of conformity and a statement of their position in the company

Seznam regulačních aktů, jímž podléhá daný typ vozidla
List of regulatory acts to which the type of vehicle complies

Viz technický protokol 121103 – 09 – TAC
See Technical Report 121103 – 09 – TAC

¹⁾ *Nehodící se škrtněte / Strike out what does not apply*

²⁾ *Není-li k dispozici v době udělení schválení typu, vyplní se tento bod nejpozději při uvedení vozidla na trh.
If not available at the time of granting the type-approval, this item shall be completed at the latest when the vehicle is introduced on the market.*

CERTIFIKÁT ES SCHVÁLENÍ TYPU VOZIDLA, strana 2
EC VEHICLE TYPE-APPROVAL CERTIFICATE, side 2

Toto ES schválení typu, pokud se vztahuje na neúplná nebo na dokončená vozidla nebo varianty, je podloženo následujícím schválením (schváleními) typu pro neúplná vozidla:
 This EC type-approval is, where incomplete and completed vehicles or variants are concerned, based on the approval(s) for incomplete vehicles listed below:

Stupeň 1: Výrobce základního vozidla: **Automobiles PEUGEOT**
 Stage 1: Manufacturer of the base vehicle: **75, avenue de la Grande Armée**
F-75116 Paris, France

ES schválení typu č.: **e2*2001/116*0365*06**
 EC type-approval number:

Datum: **16 November 2009**
 Dated:

Použitelné pro: typ / varianta: **7JNFR*, 7JNFU*, 7J9HT*, 7J9HX***
 Applicable to: type / variant: **7PNFR*, 7PNFU*, 7P9HT*, 7P9HX***

Stupeň 2: Výrobce / Stage 2: Manufacturer: **N/A**
 Stupeň 3: Výrobce / Stage 3: Manufacturer: **N/A**

V případě, že schválení typu zahrnuje jednu nebo více nedokončených variant, uveďte soupis variant, které jsou úplné nebo dokončené.
 In the case where the approval includes one or more incomplete variants, list those variants which are complete or completed.

N/A

U vozidel zvláštního určení udělené výjimky nebo zvláštní ustanovení podle přílohy XI a výjimky udělené podle článku 20:

In the case of special purpose vehicles, exemptions granted or special provisions applied pursuant to Annex XI and exemptions granted pursuant to Article 20:

Číslo bodu / Item number	Odkaz na regulační akt / Regulatory act reference	Druh schválení typu a podstata výjimky / Kind of approval and nature of exemption	Použitelné pro varianty / Applicable to variants
2	Směrnice 70/220/EHS / Directive 70/220/EEC	Výjimky a zvláštní ustanovení aplikované v souladu s dodatkem 3, přílohy XI směrnice 2007/46/ES Exemptions and special provisions applied in compliance with Appendix 3, Annex XI to Directive 2007/46/EC	všechny / all
2a	Nuřzení (ES) č. 715/2007 Regulation (EC) No 715/2007		všechny / all
3	Směrnice 70/221/EHS / Directive 70/221/EEC		všechny / all
15	Směrnice 74/408/EHS / Directive 74/408/EEC		všechny / all
16	Směrnice 74/483/EHS / Directive 74/483/EEC		všechny / all
19	Směrnice 76/115/EHS / Directive 76/115/EEC		všechny / all
39	Směrnice 80/1268/EHS / Directive 80/1268/EEC		všechny / all
44	Směrnice 92/21/EHS / Directive 92/21/EEC ⁴⁾		všechny / all
53	Směrnice 96/79/ES / Directive 96/79/EC		všechny / all
54	Směrnice 96/27/ES / Directive 96/27/EC		všechny / all

⁴⁾ Bylo posouzeno užití elektrického invalidního vozíku.
 Omezení kapacity pro přepravu cestujících: Viz informační složka výrobce.
 Use of the electric wheelchair was assessed.
 The limitation in the passenger capacity: See manufacturer's information folder.

Appendix C

Estimate for an Equalities Impact Assessment Survey

From: [REDACTED]
Sent: 14 March 2013 15:04
To: Teresa Bowley
Subject: Ballpark cost for survey

Hi Teresa

I've had a look and would advise that around £12,000 (exc VAT) would be a reasonable budget for a survey of disabled people on their use/non-use of taxis in Worthing and Adur. This assumes a model very similar to our current Northern Ireland work:

- The survey questionnaire would be very similar to that being used in our Northern Ireland survey of disabled people (so questionnaire design would be minimised).
- Questionnaires would be mailed to 1,000 disabled residents, identified through your existing records (eg. blue badge records, concessionary travel pass records etc).
- This would be supplemented by an online web survey, with your Access Group publicising the online survey site through various disabled peoples' groups and encouraging participation through appropriate publicity.
- Inclusion of a modest prize draw incentive to encourage responses.
- We would analyse and report on all responses received through the mail, online and over the phone (some respondents prefer this because of their disabilities).

We would hope to get 300-400 responses through the above approach, which is probably the minimum you'd want.

The above budget includes all printing and postage costs, which are not insignificant. Obviously if the printing and posting-out was done in-house by the Council, that would minimise the cost.

Feel free to come back to me if you have any questions (either before or after your Committee report).

Best wishes
Nick

Dr Nick Ayland
Director
Integrated Transport Planning Ltd
32a Stoney Street
The Lace Market
Nottingham NG1 1LL

T: 0115 988 6905
M: 07900 491891
E: ayland@itpworld.net
I: www.itpworld.net

Offices in Nottingham - Milton Keynes - Birmingham

Appendix D

Worthing Taxi association Representations

Licensing and Control Committee A
CommitteeDate

Agenda item 5

From: Stephen Barwick [REDACTED]
Sent: 14 March 2013 10:17
To: Teresa Bowley
Subject: Fwd: Rear loading wheelchairs

Begin forwarded message:

From: Stephen Barwick [REDACTED]
Date: 13 March 2013 19:26:30 GMT
To: [REDACTED]
Subject: Rear loading wheelchairs

To Teresa Bowley
Adur & Worthing Hackney Officer.

I write to you on behalf of Worthing Taxi Association with Reference to the application to allow rear loading wheelchair vehicles. Our view remains that they should not be allowed on the Taxi Ranks of Worthing.

1. These vehicles are perfect for Private Hire where there are plenty of safe places to load the passenger or passengers.
2. There is not a safe place to load a passenger into a rear loading wheelchair vehicle on the Worthing Taxi Ranks as you need a 2 metre loading space at the rear of the vehicle and with a rear loading WAV it must be taken into consideration there is a chance of someone or something running into the back of them causing passenger and driver to be maimed.
3. When a Hackney Carriage vehicle is plying for hire on a taxi rank it must be ready to take the passengers and their luggage, if they have any, and store it in a safe place in case of an accident. This particular vehicle, if a wheelchair passenger is being carried, has no safe place to store luggage and if there was a accident the luggage or shopping would go flying possibly causing damage or injury to passengers and/or driver.
4. These rear loading WAVs are not suitable for a wheelchair passenger accompanied by an 'assistance' dog as there is nowhere for the dog to sit safely. Do you leave the dog behind?

Yours sincerely

Steve Barwick
For the Worthing Taxi Association.

Worthing Taxi Association

Tel:07774 809 403

1st July 2012

Ref: Rear Loading Wheelchair Loading Taxis

Attention of:

Mr Tony Armstrong Worthing licensing Officer

Worthing Licensing Committee

Mr Simon Jones Worthing Licensing Officer

Firstly I would like to thank you all for your time with reference to this issue on behalf of all our members and non members, as an association we represent all members of the Worthing taxi association and a large amount of non members and we hope that this report will give you good reason to object to introduction of rear loading taxis on Worthing taxis ranks for the following reasons, also we would like to make it quite clear that we do not single out any particular manufacturer or any particular vehicle, our views are quite strong with regards to health and safety for our drivers and our passengers and we do not believe that rear loading taxis in Worthing should be an option although some of them are of good design and are cheaper to run.

We do not feel that because some of these vehicles cut a drivers weekly running cost that the introduction of them should be allowed as we feel that Customer safety should be taking in to account and is more important that saving money.

I am sure you are aware of some of the issues with the position and the amount of space and the lack of taxi ranks and also the design of some of the taxi ranks within Worthing also the constant problems we have with regards to PCNs being issued to drivers when dropping disabled customers off within the town, if not I will give you a quick run down.

Chapel Road taxi rank has enough spaces for 12 licensed vehicles and is full most of the time, it has a police bay at the front of the rank to witch we are not allowed to use the whole area around the rank has double yellow lines with restrictions ie double yellow lines there is no were for the drivers to pull off if using a rear loading wheelchair vehicle were with side loading vehicles it is quite easy if a driver is sitting on the taxi rank to load a wheelchair, our drivers concerns are we have a constant issue with delivery drivers in lorries, vans and also members of the public in cars using the taxi rank for parking also chapel road is constantly busy with buses and cars with a 20MPH speed limit to witch is very really observed, also if a rear loading WAV is on the taxi rank and needs to load a customer it would mean a driver pulling of the rank were he may have been sitting waiting for a job for a while and driving round the block to rejoin the rear of the rank, although drivers would do this if needed we would not deem this fair on that driver.

Worthing central station taxi rank also has major problems one being that we believe that the taxi rank is the wrong way round as drivers face on coming traffic because the rank was put in place before the WAV were introduced in Worthing, opposite the taxi rank outside the Grand Victoria hotel the road has a deep camber in the road so we have no option but to load wheelchairs in the road, I would ask you to consider is it correct to ask a customer in a wheelchair to have to position themselves in the road with on occasions having to ask them to go on to the crossing and then go sometimes along the length of the taxi rank in the road, a busy road to get to a WAV and be loaded in the road, we feel its not safe for anyone to have to do this with the fact that your are even being asked to consider rear loading vehicles in Worthing.

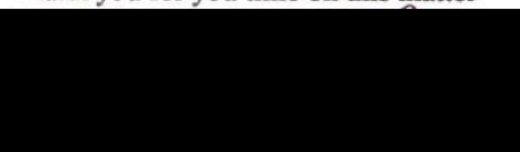
we would like to bring to your attention to an early day motion that was aired in the house of commons by Andrew Rosindell MP for Romford, the issue raised gained full cross party support, Mr Rosindell said this house believes that converted vehicles, Hackney carriages (Taxis) that load wheelchair passengers from the rear, that are currently licensed in a growing number of local authorities outside of London, particularly in the north east and now in the south, are unsuitable for taxi use; notes that whilst being loaded such rear-access taxi place the wheelchair user passenger in a dangerous position on the road to the rear of the taxi, where he/she risks being hit by traffic coming up from behind; further notes that many AA,RAC and Green Flag recovery technicians are killed on uk roads by traffic approaching from behind whilst standing behind vehicles; notes the concerns that Radar and the spinal injuries Association have about rear loading taxis; further notes that those licensing rear loading taxis do not seem to have undertaken a comprehensive risk assessment; and therefore calls upon all licensing authorities throughout great Britain and northern Ireland ONLY TO LICENSE SIDE LOADING wheelchair accessible taxis from now on.

Please note you are being asked to license rear loading Combi type vehicles when the use of minibuses, MPVs with windows are all criticised by wheelchair user groups, the spinal injuries Association and Radar, the Royal association for Disability and Rehabilitation. they have written to local authorities across the country expressing concern about these vehicles being used as hackney carriages when they say there is ample choice for the use of purpose built taxis which have side loading access and wheelchair ramps. Wheelchair users also say it is an undignified process for them to be wheeled into the gutter to be loaded into the rear loading taxis and they want to be treated the same as able passengers and use the side entry doors to and from the pavement. all of London's 74,000 purpose built taxis have side loading access for wheelchair users .

The (LTDA) London taxi drivers Association have opposed rear loading taxis due to the concerns of the members and wheelchair users organisations and to date these types of vans/combis are still not allowed .

We would ask you and your officers to oppose the use of rear loading Taxis at this moment in time until such times as things change and these types of taxis/vans are investigated more and we strongly feel and would request that if you decide to allow these type of vehicles within our borough that a major health and safety risk assessment be carried out and that manufacturers or dealers that are fighting the local authorities pay for this assessment as we feel that driver and passenger safety is more important than profit and that wheelchair users should be treated as any other member of the public and have the same rights and dignity and respect.

Thank you for you time on this matter



Mr Steven Barwick (WTA Treasurer)



Mr M Dawkins (Chairman)