

Conditions of Licensing for Taxis and Private Hire Cars

Report by Director, Resources

1 Purpose of Report

To seek to provide further information concerning the revised conditions of licensing for Taxis and Private Hire Cars and Drivers that were not approved at the last meeting.

2 Background

- 2.1 On 1 April 2014, the Committee approved the implementation of the revised conditions of licensing.

Consideration of two issues was continued, namely (a) **Fixed Steps on Taxis**; and (b) information relating to the **Dimensions of Taxis**.

- 2.1 In respect of **Fixed Steps**, there is attached a summary of the position as **Appendix 1**. Essentially, the Taxi Owners' Association consider that they should be permitted, whereas, the Cab Inspector considers them to be inherently dangerous and does not consider that they should be permitted. Sometime ago, the Taxi Association stated that Fixed Steps were permitted in London. The London Taxi Authority has confirmed that this is not the case and the relative conditions of licensing confirm that the step must be able to fold or retract so that it does not project beyond the side face of the vehicle and the vehicle is not capable of being driven away unless the step is so folded or retracted. However, they reported that certain manufacturers are considering improvements to the design so it is possible that eventually a design will be produced that is considered safe, etc. A report giving further background information which was presented to Committee in 2011 is attached (**Appendix 2**).
- 2.2 **A condition relating to the Dimensions of Taxis**, has been included in the Conditions of Fitness since the standard conditions were implemented in 1987 but relates to the previous standard for metropolitan style taxis. There is contained in **Appendix 3**, a statement in this respect. No justification has been given by the Association for any alteration in approach other than the possible unfairness of not requiring the same of Private Hire Cars.

3 Report Implications

3.1 Resource

There are no resource implications arising directly from this report.

3.2 Risk

The Risk relates to the inclusion of conditions of licensing which may not address the issues that arise.

3.3 Single Midlothian Plan and Business Transformation

Themes addressed in this report:

- ☐ Community safety
- ☐ Adult health, care and housing
- ☐ Getting it right for every Midlothian child
- ☐ Improving opportunities in Midlothian
- ☐ Sustainable growth
- ☐ Business transformation and Best Value
- ☐ None of the above

3.4 Key Priorities within the Single Midlothian Plan

Not addressed here.

3.5 Impact on Performance and Outcomes

Not addressed here.

3.5 Adopting a Preventative Approach

Virtually the whole thrust.

3.6 Involving Communities and Other Stakeholders

The Hire Car Associations and the Police have been consulted.

3.7 Ensuring Equalities

There is equality of Opportunity.

3.8 Supporting Sustainable Development

Not addressed here

3.9 IT Issues

None arising.

4 Summary

4.1 The current condition relating to Steps is shown in **Appendix 4.**

Consideration could be given to the deletion of the sentence “Fixed Steps” shall not be permitted” on the basis that the Cab Inspector can consider any requests by licence holders for a material change to adapt by providing Fixed Steps and be able to assess the suitability of these and if necessary report back to Committee for a decision.

4.2 It is considered that it is best that the Dimensions of Taxis should continue to be recorded in the conditions, though not perhaps in the existing form i.e. that the width be amended to relate to the new style People Carrier type vehicle; and the maximum width be two metres.

It is not considered that the same criteria should be replicated in Private Hire Car licence conditions owing to the wide diversity of vehicles that may be used.

5 Recommendations

It is recommended that the Committee consider:-

- (a) approving the continued inclusion of the conditions of licensing relating to Fixed Steps on Taxis and Dimensions of Taxis; or
- (b) deleting the reference to the Prohibition of the Fixed Steps in Taxis on the basis that the Cab Inspector will be able to monitor the position and advise accordingly; and
- (c) retaining or deleting the condition of fitness relating to the dimensions of taxis; and/or inserting a similar condition in respect of Private Hire Cars and if so minded to seek a further report.

Date 5 May 2014

Report Contact:

Bob Attack Tel No 0131 271 3161

attackb@midlothian.gov.uk

Background Papers: Note of Meeting of 13 March 2014

APPENDIX 1

As regards Fixed Steps, the representatives of the Taxi Owners' Association made representation that they be permitted. The unreliability of the retractable steps seems to lie at the root of the problem from their perspective. The local supplier has told them that the design is incapable of remedial action and advised that them that the lack of maintenance is the cause. The Association say that there is also a possible design defect in that when the Taxis are fully laden the under-slung steps are highly susceptible to impact damage when the underside of the taxi makes contact with road humps, etc. The Cab Inspector indicated previously that he considered that Fixed Steps were inherently dangerous in that they presented a danger to injury from the protruding step to any members of the public standing at the side of the road. Colleagues in the London Taxi Unit were consulted last year and they were considering the issue. It is recalled that the considered view was that Fixed Steps were not safe but new tapered and more streamlined versions were being designed by the manufacturers and these may prove to be acceptable.

APPENDIX 2



General Purposes Committee
Tuesday 6 December 2011
Item No 5(d)

Civic Government (Scotland) Act 1982 Taxis – Fixed Steps

Report by Director, Corporate Resources

1 Purpose of Report

To update the situation as regards fixed steps in Taxis.

2 Background

On 4 October 2011, the Committee noted the attached report (Appendix 1) and agreed *inter alia*, to continue consideration of a request by Midlothian Taxi Owners' Association that Fixed Steps be permitted in Taxis, for further information. Another issue that arose during the viewing which preceded the Meeting of the Committee related to the height of the steps, namely a suggestion that the current height of 380 mm was too high for disabled users.

It had been expected that, by now, Transport Scotland would have produced the revised Best Practice Guidance in respect of the licensing of Hire Cars and Drivers. However, the Guidance has not yet been released. It is expected that the guidance will be issued towards the end of November / beginning of December.

In the meantime, the Secretary of Midlothian Taxi Owners Association has submitted comments in respect of fixed steps in a submission regarding their view that the shared service provided at the Taxi Examination Centre be discontinued (an excerpt of which is attached as Appendix 2 hereto).

3 Update - Fixed running boards on Taxis

Requests for information were circulated to all local Authorities in Scotland; and the Department for Trade, VoSA, Disabled User Groups, etc and a summary of the responses is shown in **Appendix 3**. The feedback from Local Authorities is not conclusive. Many do not insist that Taxis are of the Metropolitan or similar style; do not have conditions that relate to accessibility issues; and, therefore, the problem does not arise. Of those which do, all insist that steps be retractable. The report from the City of Glasgow Council (**Appendix 4**) highlights safety concerns that were expressed about fixed running boards.

4 Concerns expressed by Police

As indicated in the previous report, the Chief Constable considers that a danger to public safety is presented by fixed steps which may be outwith the overall width of the vehicle. The Inspector is concerned that 'the fixed running board could place the public at risk, in particular, to the lower leg or ankle, particularly at busy venues where the public are milling around'. He appreciates that 'wing mirrors are also outwith the width of the vehicle (there is a legal requirement for them to be fitted) but when something strikes them they fold in and break easily preventing serious damage'.

He adds that the 'fixed running boards are also extremely vulnerable to being kerbed due to the height of many kerbs and so are likely to be more easily damaged'. He notes that there is no requirement for 'side steps to be electronic and an alternative mechanical step, which is retractable manually, could be installed'; and observes that the main reason for owners wishing to adopt fixed running boards is purely a cost and maintenance issue and does not feel that public safety should be compromised on a cost issue.

He confirms that, already, City of Edinburgh Council and, as noted above, City of Glasgow Council have refused to allow them.

A few Taxi Licence holders have intimated that they are considering adapting their vehicles but none have submitted an application for the material change of circumstance.

5 Comment

As indicated in the previous report, it had been intended that the issue of Running Boards be examined when comments on the conditions of licensing were being considered.

The current condition of fitness is as follows:-

15.1 The top of the tread of the lowest step for any entrance, or where there is no step the floor level itself at the entrance, must not be more than 38 cm above the ground when the vehicle is unladen.

15.2 All steps, or where there are no steps, the outer edge of the floor at each entrance must be fitted with non slip treads.

In the draft revised conditions of licensing, provision is made in the Conditions of Fitness for Taxis as follows:-

16 Where any step in the vehicle is electronically operated it must be fully retractable, tamper and weather proof. Any such step must be equipped with sensors and a warning system to alert the driver when the step is extended. This step should be under the automatic control of the driver in such a way that it cannot be left extended when the vehicle is moving. No fixed steps shall be fitted.

16.1 The top of the tread of the lowest step for any entrance, or where there is no step the floor level itself at the entrance, must not be more than 38 cm above the ground when the vehicle is unladen.

16.2 All steps, or where there are no steps, the outer edge of the floor at each entrance must be fitted with non slip treads.

6 Resource and other implications

There are no resource implications arising from this report.

7 Conclusion

Fixed Steps – Of the authorities that insist on Taxis being of the Metropolitan style, conditions are imposed similar to those proposed. In other local authority areas, where saloon cars are licensed as Taxis, where there are no conditions relating to steps, the standards of examination and enforcement may not be as comprehensive as those currently carried out on behalf of Midlothian (and Edinburgh and West Lothian) and therefore, the matter may not have even been raised. In the time available, it has not been possible to undertake any further research.

There is evidence provided by a disability group in Glasgow to suggest that there are public safety issues.

Height of Steps – this issue has not yet been addressed as the national accessibility study has not yet started. Further research could be carried out if thought appropriate.

8 Recommendations

It is recommended that the Committee:-

- (a) consider whether the effect of the amended condition of licensing about retractable steps ought to be applied with immediate effect; and
- (b) as regards the height of steps, consider what further action is appropriate e.g. consider calling for a further report in relation to the implication for disabled passengers.

**J Blair
Director
17 November 2011**

Contact Person:	R G Attack	Tel No: 0131 271 3161
Background Papers:	File CG 10.7(RGA)	

APPENDIX 2

Excerpt from email dated 17 October 2011 from Midlothian Taxi Owners' Association concerning Fixed Steps in Taxis

- (a) there is no evidence or reports of any kind that the fixed steps are in any way dangerous;
- (b) 'the Cab Office were determined to ban the use of the steps', but have 'no experience of them in the working environment at all';
- (c) none of the Councils with a working experience have had any problems with the steps being in everyday use;
- (d) the taxi drivers in Midlothian that have used the fixed step have had no problems whatsoever;
- (e) a number of taxi owners have expressed their wish to have the fixed steps fitted as soon as possible due to their bad experiences with the electrical and mechanical steps last winter; and
- (f) the Cab Office denied refusing to test Midlothian taxis with the steps fitted; and
- (g) the fixed step type is an improvement over the electrical and mechanical types that are prone to jamming and not functioning as they should in bad weather conditions.

APPENDIX 3

All local Authorities were asked to provide the following information. Few did as the information is not generally kept.

1. Number of Taxis in Fleet:-		
2. Number with Fixed Steps sub divide column to show:-	Number of Miles covered:-	Number of accidents:-
3. Number with Retractable Steps sub divide:-	Number of Miles covered:-	Number of reported breakdowns and no of accidents:-
4. Do your conditions allow fixed steps sub divide retractable steps YES /NO*:-		
5. Whether consultations have taken place with User groups and if so feedback received:-		
6. Any other comments		

The responses were as follows:-

Argyle - this has never been an issue which has been raised. We do not have any specific condition in our licences relating to steps.

North Lanarks - Our taxi specification does not specify side step requirements or dimensions. There are vehicles in the fleet which have electric or manually operated retractable steps. However, over the course of time, the majority of these have been replaced with fixed side steps to overcome reliability issues. Our taxi testers apply 'MOT logic' to each vehicle in that the step must be secure and fit for purpose. The steps we have seen have been factory made, and none have had to be rejected on safety grounds. Indeed, some of the new vehicles now come fitted with rigid steps. NLC testers have not had any issues to date with rigid steps, and hence we would have no problem with allowing them going forward.

Perth and Kinross - do not have any conditions relating to steps on taxis.

West Dunbarton - The current conditions do not include anything regarding steps.

East Lothian - Although It doesn't state in the ELC Conditions that fixed steps are not permitted. We do not allow steps which extend beyond the outer most point of the body so by default it is unlikely that any fixed step would be practicable as it would be unlikely that it could be used for access. There are taxis in the fleet that have fixed steps but these are ones that were in the fleet prior to the current ELC

Conditions being passed by the Sub-Committee (May 2007). With regard to the numbers who have steps of either kind we do not keep these records therefore not possible to give any indication of numbers. Mileage is recorded when the vehicle appears for its annual check but only on the form therefore it would require a lot of work to extrapolate this information to supply an answer. ELC are unaware of any accidents involving the steps on vehicles and we are not notified of any breakdowns.

Their advice as regards steps is as follows:-

The top of the tread on the lowest step for any entrance, or where there is no step on the floor itself at the lowest entrance, must not be more than 38 centimetres above the ground when the vehicle is unladen. Where any step in the vehicle is electronically operated, it must be fully retractable, tamper and weather-proof. Any such step must be equipped with sensors and a warning system to alert the driver when the step is extended. This step should be under the automatic control of the driver in such a way that it cannot be left extended when the vehicle is moving.

Stirling Council has no policy in relation to steps on wheelchair vehicles.

West Lothian – Following consultation with the trade, retractable steps only although these do not require to be electronic. As regards number of reported breakdowns and no of accidents, One operator experienced problems with icing over the bad winter. It was pointed out that an external step could be utilised in severe weather. One operator said she kept damaging her vehicle on road humps. She was referred to the manufacturer for a check and made no further complaint.

Highland currently don't have any policy in relation to the provision of fixed steps.

London - There are approximately 22,000 Taxi Cabs in London (Black Cabs) all have a step which is manually fitted and most a swing out seat. The exception is the Mercedes which has a motorised step with inter-locking so that it cannot be in the extended position when the vehicle is driven. Approximately 8% of the fleet is Mercedes.

The position is fixed as the mounts for the step is welded bolted to the chassis outriggers, the step its self is in the boot of the taxi and is fitted when required by the driver. Hope this helps. Conditions state that the step must be capable of being folded or being retracted to ensure that it does not protrude outwith the body line. Condition is as follows-

The top of the tread for any entrance should normally be at floor level of the passenger compartment and comply with the following requirements:

- a) be not more than 380 mm from the ground, (measured at the centre of the tread width);
- b) the surface shall be covered in a slip-resistant material;
- c) have a band of colour across the entire width of the edge which shall contrast with the remainder of the tread and floor covering.

Should any entrance be more than 380 mm from the ground, an external interim

step must be made available when the associated passenger door is opened and comply with the following requirements-

- a) not be more than 380 mm in height from the ground, (measured at the centre of the step width;
- b) not be less than 250 mm deep;
- c) the surface shall be covered in a slip-resistant material;
- d) have a band of colour across its leading edge which shall contrast with the remainder of the step and floor covering;
- e) not be capable of operation whilst the vehicle is in motion;
- f) if automatic or powered, be fitted with a safety device which stops the motion of the step if the step is subject to a reactive force not exceeding 150N in any direction and if that motion could cause injury to the passenger;
- g) can fold or retract so that it does not project beyond the side face of the vehicle and the vehicle is not capable of being driven away unless the step is so folded or retracted.

Department for Trade - the research project which the Department proposed as part of the outcome of the wide-ranging consultation about accessible taxis, has not yet commenced. We are still considering our overall strategy in relation to taxi accessibility (including the commencement strategy for sections 165 and 167 of the Equality Act 2010). An announcement will be made in due course.

The height of step was studied as part of the Department's research project *Determination of Accessible Taxi Requirements*, which was used to inform the development of the draft technical specifications which were used as part of our 2009 consultation. The guidance states that 'some people cannot manage even a single step and may need a ramp with a gentle gradient if level entry isn't possible. If steps are necessary they should be restricted to a single step that is 100mm high. The steps should be the width of the door entry and be closed at the back without an overhang to reduce the risk of tripping.'

Taxi Examination Centre

The extreme low temperatures that we have experienced recently not only affected electric steps but many other components of the vehicle such as windscreen washers, door locking systems, cooling systems and so on all of which are seasonal. It is of note that given the large number of taxis which operate within Edinburgh having electric steps I never received one complaint either from the travelling public or drivers I would be opposed to the use of fixed side steps which may well be within the overall width of the vehicle, on the grounds of safety for the public and the damage which can be sustained.

In his submission Ian states that customers ankles are not in danger because the whack across the ear by the wing mirror encourages them to step back however I would be concerned should drivers be placing passengers at this type of risk. Vehicles arriving at busy venues when the public are milling around would most certainly be a danger to the public's wellbeing.

Experience tells me that fixed side steps are extremely vulnerable to being kerbed which then leads to obvious damage.

There is no requirement for side steps to be electronic and as an alternative a mechanical step which must be retractable could be installed and this would ensure that customers were not standing on the step when the driver was retracting the component.

Finally during the cold spell which we experienced people had to adapt many aspects of their life and it may be that provision for assisting passengers into the vehicle could have been provided by means of a step carried in the vehicle. This step could be similar to that used by caravaners or similar.

SATA

I know that the steps are too high for many elderly people with mobility problems - they prefer to use saloon cars. I have had the experience of a van-type taxi with a step on only one side. The driver said this was because of the cost! Dundee City Council is currently consulting on whether the whole taxi fleet should be wheelchair accessible. The overwhelming response of Dundee Celebrate Age members and interviewees is that there should be about 50-50 saloon cars and wheelchair accessible vehicles.

APPENDIX 3

Phone 0141 287 3313
Fax 0141 287

Date : 5/07/2011

Our Ref : AV TW200s

To : LICENSING AND REGULATORY COMMITTEE

From : JOHN DONOHOE INSPECTION CENTRE MANAGER

Copies : File

APPLICATION FOR INCLUSION IN APPROVED VEHICLE LIST

VEHICLE MAKE : Fiat

VEHICLE MODEL: TW200s

LICENSE CATEGORY :	TAXI	ENGINE SIZE	MORE THAN 1600CC
SEATS INCL DRIVER'S	7	REAR SEAT WIDTH	MORE THAN 48 INCHES
INSPECTED BY	JOHN DONOHOE	BROCHURE	AVAILABLE

The above vehicle was assessed by the Inspection Centre and found to meet the minimum requirements for use as a licensed taxi; the base vehicle has M1 whole vehicle type approval but this version may require additional testing from the Vehicle Certification Agency, due to modifications made by the manufacture, these give us some concerns.

Attached is a report from Glasgow Centre for Inclusive Living who has also assessed the vehicle.

Concerns

- This vehicle is fitted with fixed side runner steps to both the offside and the nearside making it difficult for passengers to enter and exit the vehicle due to the size of the step, 155mm deep (as previously reported and refused)
- There are no sight patches on the rear seats for partially sighted passengers.
- There are no door entry lights at the steps to assist passengers entering and exiting the vehicle,

- There is no roof signage that illuminates at the rear of the vehicle to alert other road users that the rear doors are opening and passengers may be exiting the vehicle.

On the last three converted vehicles that have been added to the approved vehicle list we have requested that they are fitted with the following:

- Electric side steps on both the offside and nearside.
- Side step switches are illuminated and fitted with a buzzer.
- The side step will retract when the handbrake is released or when the vehicle is in motion.
- Illuminated door open sign on roof.
- Sight patches on all rear seats.
- Door entry lights at step area.
- Doors opening warning lights fitted to the roof alerting other road users that sliding doors are opening and passengers may be exiting the vehicle.

Conclusion

Down grading the vehicle will be a retrograde step, this will erode the standard that have taken so long to build, we therefore do not recommend members consider amending the operators licence to reflect the amendments to the vehicle in question.

John Donohoe

Inspection Centre Manager



Glasgow Centre for Inclusive Living
117-127 Brook Street
Glasgow G40 3AP

Tel: 0141 550 4455
Fax: 0141 550 4858
Textphone: 0141 554 6482
Email: gcil@gcil.org.uk
Website: www.gcil.org.uk

To Mr John Donohoe Inspection Centre Manager

Glasgow City Council
Licensing and Regulatory Committee

This report highlights our concerns over the potential removal of accessibility features from taxi cabs as requested by Paton Limited and Allied Vehicles Limited.

Recommendations

The committee consider the impact of removing these accessibility features from taxicabs produced by Paton Limited and Allied Vehicles Limited and how this will affect access for disabled people and older people in Glasgow.

The committee should consider existing limitations placed on disabled people and older people in Glasgow, given the lack of accessibility in our existing public transport system in Glasgow

Other companies may seek similar concessions, which would produce a severe lack of modern fully accessible taxicabs in Glasgow.

The committee should seek to encourage good practice and high levels of accessibility in the design of and manufacture of taxicabs having access to accessible vehicles like this encourages the participation of disabled people-



Supported by
The National Lottery
through the Big Lottery Fund



Dear Mr Donohoe

My colleague, Donald Anderson, and I have taken the opportunity to review the photograph and examined both types of vehicles highlighting the proposed changes to the level of accessibility of some taxis within Glasgow.

We are concerned that implementing these proposed changes would significantly reduce the level of accessibility of taxis within Glasgow and send an inappropriate message about the city's commitment to deliver accessibility, particularly at a time when the city is concerned to promote positive aspects in Glasgow in the lead up to the Commonwealth Games in 2014.

This report highlights our concerns regarding changes in the level of accessibility to taxi cabs produced by Paton Limited and Allied Vehicles Limited. We would like to highlight the following issues:

1. The cumulative effect of removing accessibility features will certainly convey a lack of commitment to the inclusion of disabled people and older people within Glasgow.

The following features are going to be changed:

- A retractable step, which provides ease of access into and out of the taxi. As this step is retractable, and sits under the cab, it reduces the possibility of accidental injury by someone passing by the cab.
- High-visibility yellow material from the seats, which enable visually impaired people to sit down safely in the cab.
- LED lighting at both door exits. This lighting also helps visually impaired people enter and exit the cab safely, thus reducing potential injury.
- This type of cab has sliding doors, which can make it difficult for other drivers to see when the doors are opening to allow someone to enter or exit the cab, particularly in late evening or on winter days. To overcome this difficulty, cabs currently have a high-visibility sign which alerts drivers behind the cab that someone is going to exit the cab, with an arrow indicating which door.

- The proposed removal of this signage will reduce the safety of all people using the cab, in particular disabled people and older people, who can take longer to exit the cab. Without this sign, it is possible that a driver could pull out; unaware that someone is attempting to leave the taxi. The proposed replacement, hazard warning lights, will only convey the fact that the taxi has stopped, and not that someone is getting out of the vehicle.

Glasgow City Council has worked hard to improve the level of access in taxi cabs. The removal of these accessible features will take the City back at least ten years in the wrong direction in its aim to improve the participation of its disabled and older citizens, in accordance with the Equalities Act 2010.

Regarding the replacement of the retractable step with a fixed step, we are extremely concerned about the following safety issues:

- Both steps will be reduced in width by 10mm, making it more difficult to place your foot securely on the step.
- Although the fixed step will not project beyond the width of the side mirrors, it will be difficult for some people to see, when walking close to the kerb along narrow or crowded streets.
- Impact with a side mirror, which can flex, is a different matter than impact with a step, which is a solid, immovable object, and is well away from a person's field of vision. Impact with these fixed steps could cause severe bruising or the fracture of a limb.
- For people who do not require the step, primarily non-disabled people, negotiating the fixed step, especially when exiting the cab presents a real hazard because it would be unexpected.
- For visually impaired people and older people the risk of injury from being hit by the fixed step is increased.

2. When other forms of public transport have limited levels of accessibility within the City (bus, train, and underground) the provision of accessible taxis provides an opportunity for door-to-door accessible transport.

Reducing the number of accessible cabs by allowing the current standards of accessibility to be removed from future vehicles, will have a significant impact on disabled and older people in the following ways:

- Increased waiting times for accessible vehicles
- Make it difficult or impossible to access essential services such as GP, dental or hospital appointments
- Make it difficult or impossible to access social and educational opportunities
- Reduced spontaneity in the lives of disabled and older people
- May result in some people becoming unwilling to leave their homes because travel has become too difficult

3. In the lead up to the Commonwealth Games in 2014 a reduction in the number of accessible taxi cabs projects an even more negative image for Glasgow, given the inaccessibility of our existing transport network.

At a time when Glasgow will attract greater numbers of visitors to the City, some of whom will be disabled people who have mobility impairments, visual impairments or be wheelchair users, a reduction in the number of accessible taxis available, will further re-enforce the image that the City is difficult to move around in. The underground system, for many people is completely out of bounds. Many buses still are inaccessible. Accessible transport in Glasgow already lags behind many other British cities.

The Equalities Act 2010

The manufacturers who are proposing these changes will, of course, be exempt from any cases of discrimination which will occur because of the features of their vehicles. The owners of these vehicles are likely to face challenges under the Disability components within the Equalities Act 2010.

The Disability Discrimination Act has been incorporated into the Equalities Act and one of the possible outcomes will be that removing accessibility which has previously existed will be treated more seriously than failing to provide access in the first instance. Should the Council acquiesce to allowing accessible features to be dropped from the design of future vehicles, taxi owners will take the view that the Council, through the Licensing Board agreed to these changes, and it therefore, in part liable to take some of the legal consequences of failure to provide a service or access to a service.

In conclusion, Glasgow Centre for Inclusive Living would urge the Taxi Licensing Board to continue its commitment to provide vehicles which meet the needs of individuals with aged related impairments, such as arthritis, visual impairments and wheelchair users in a way which empowers them to live ordinary lives on an equal basis with other Glasgow citizens.

Yours Sincerely

Donald Anderson and John Dever

Glasgow Centre for Inclusive Living

APPENDIX 3 OF REPORT FOR 20 May 2014

In respect of the Dimensions of Taxis, the condition is currently as follows:-

- 15.1 The body must be of the fixed head type with a partially glazed partition separating the passenger from the driver.
- 15.2 (a) Outside dimensions
 - i) The overall width of the vehicle exclusive of driving mirrors must not exceed 1.78 metres.
 - ii) The overall length must not exceed 5 metres.
- b) Inside dimensions of the passenger compartment.
 - (i) The vertical distance between the point of maximum deflection of the seat cushion when a passenger is seated to the roof immediately above that point must not be less than 96.5 centimetres.
 - (ii) The width across the rear seat cushion must not be less than 1.07 metres.
- 15.3 Any curvature of the floor of the passenger compartment must be continuous and must not exceed 2 centimetres at the partition and 5 centimetres at the base of the rear seat when measured between the centre line and the sills.
- 15.4 The door and doorway must be constructed so as to permit an unrestricted opening across the doorway of at least 53 centimetres when the door is opened to its normal limit.
- 15.5 The clear height of the doorway must not be less than 1.2 metres.

Appendix 4

Steps

- 16 Where any step in the vehicle is electronically operated it must be fully retractable, tamper and weather-proof. Any such step must be equipped with sensors and a warning system to alert the driver when the step is extended. This step should be under the automatic control of the driver in such a way that it cannot be left extended when the vehicle is moving. No fixed side steps shall be fitted.
- 16.1 The top of the tread of the lowest step for any entrance, or where there is no step the floor level itself at the entrance, must not be more than 38 centimetres above the ground when the vehicle is unladen.
- 16.2 All steps, or where there are no steps, the outer edge of the floor at each entrance must be fitted with non-slip treads.