Dumbarton and Alexandria Taxi Trade Association
Response to West Dunbartonshire Taxi Study

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Introduction

This document represents the response by Dumbarton and Alexandria Taxi Trade Association (the Association) to the West Dunbartonshire Taxi Study undertaken by the Tri Taxi Studies Group.

The report prepared by the Taxi Studies Group set out a number of conclusions at paragraph 8.0. There are three principal conclusions contained in the report as follows:-

1. There is no significant unmet demand for taxi services either in the Dumbarton or Clydebank taxi zones.

2. The number of fully accessible vehicles required within the Dumbarton zone to meet the demand for taxis for passengers with ambulant impairment is 23.

3. A fully accessible fleet is a desirable long term goal and the study supports the concept of a graduated introduction of accessible vehicles as being the most appropriate method of achieving a fully accessible fleet.

This response will comment upon each of the conclusions in turn and set out the Association's position.

Significant Unmet Demand

The conclusion reached by the Taxi Studies Group is that there is no significant unmet demand for the provision of taxi services in either the Dumbarton or Clydebank taxi zones. Indeed the report concludes that there are certain indicators that the current number of taxis exceeds the demand for taxi services (paragraph 1.1 on page 6).

In arriving at this conclusion, the Taxi Studies Group undertook a series of surveys, which included stance observations, pedestrian surveys, an access survey and a questionnaire sent to all drivers. In addition, two focus group meetings were held with interested parties. The Association acknowledge that this aspect of the study involved a comprehensive assessment of the demand for taxi services and accept the conclusion reached by the Taxi Studies Group on this issue.

It is notable that the assessment of demand relies upon information collated from various sources. This information was then used to assess the demands for taxi services, applying similar criteria to studies carried out elsewhere whilst also taking account of factors particular to the users of taxi services in West Dunbartonshire.

Accessible Taxi Services in Dumbarton

It is accepted that the Taxi Studies Group also carried out a detailed assessment to determine the number of fully accessible taxis required to meet the needs of taxi users in the Dumbarton and Vale of Leven zone. This issue is set out on pages 40 to 46 inclusive of the Taxi Studies Group report. A detailed calculation was carried out to determine the number of fully accessible taxis required to meet the demand for services from those with ambulant impairment in the Dumbarton and Vale of Leven zone.

The conclusion reached is that a minimum of twenty three fully accessible vehicles should be made available within the Dumbarton zone to cater for the needs of passengers with ambulant impairment. “This number would address the needs of the current travelling public and take account of an increase in use resulting from provision of accessible vehicles based on current stated needs.” (Paragraph 8.1.6 on page 51.)

The Association accepts the conclusion reached by the Taxi Studies Group on this issue and note that the number broadly equates to the pervious number of 25 fully accessible vehicles which they have agreed to work towards providing in the Dumbarton and Vale of Leven zone.

Fully Accessible Fleet

The approach taken by the Taxi Studies Group when commenting upon the merits or otherwise of a fully accessible fleet are in marked contrast to their analytical approach taken in assessing the demand for taxi services for the public as a whole, and for taxi users with ambulant impairment.

The study highlights the perceived benefit to taxi users with shopping and with children’s buggies when accessing and leaving a fully accessible taxi vehicle when compared with a saloon vehicle. It is also suggested that a fully accessible fleet offers a higher level of services to those with ambulant impairment seeking taxi transport in that it does not necessitate identification of a particular vehicle type within a taxi rank.

The views in relation to taxi users with shopping and children’s buggies appears to be based upon observed use. The perceived benefit is that operating a fully accessible vehicle speeds up the process of getting into and out of a taxi for such users. This perceived benefit requires to be considered in the context of the principal finding that there is no significant demand for taxi services which is unmet. Indeed the report concludes there are certain indicators that the current number of taxis exceeds demand

(paragraph 1.1 on page 6). There is accordingly no appreciable benefit to be gained from being able to get such users into and out of a fully accessible vehicle when compared with that of a saloon vehicle.

More fundamentally, it is an offence to drive a taxi with a buggy in it's upright position and an endorsable offence if a child is strapped into the buggy. The perceived benefit is accordingly anything but; such a practice is unlawful and compromises the safety of the passengers and the driver as fully accessible vehicles are not capable of safely securing children's buggies.

It is also not entirely clear why travelling with large amounts of shopping in the rear of a fully accessible vehicle is advantageous when compared with storing such shopping in the boot of a saloon vehicle. It is suggested albeit anecdotally that the latter may well be a preferred option in that it offers greater security for the transportation of such goods.

The perceived benefits highlighted by the study are potentially flawed and in any event of questionable value. The recommendation to move to a fully accessible fleet has been made without any consideration of whether the public want this. The recommendation has also been made without a proper consideration of the potential advantages/disadvantages of introducing such a fundamental change to the approach taken to the licensing of taxi vehicles in West Dunbartonshire.

Public Opinion

The pedestrian survey undertaken by the Taxi Studies Group would appear to suggest that the majority of the public are not in favour of such a change. It is notable that when dealing with service performance, the pedestrian survey rates the appearance and comfort of existing taxi vehicles as good or very good. This clearly applies to all current vehicles operating as taxis.

In the comparative exercise carried out in the pedestrian survey, saloon vehicles were considered preferable to fully accessible vehicles on comfort and were generally comparable to fully accessible vehicles for ease of access and egress. It would appear for all indicators that saloon vehicles were rated as broadly comparable to fully accessible vehicles, with the exception of children's buggies (Table 10 on page 26).

Special Needs

The absence of a clear preference in favour of fully accessible vehicles is also demonstrated in the access survey issued to individuals with personal experience of special needs for transport. The number of respondents expressing a preference for fully accessible taxis was similar to those expressing a preference for saloon vehicles(Table 19 on page 33) These findings undermine the common misconception that taxi users with special needs prefer fully accessible taxis. Whilst this is the case for users who are in wheelchairs, there are other special needs groups such as the partially sighted, the elderly etc who prefer saloon vehicles. The Association understands that Age Concern in Dumbarton have expressed such views to the Council on a number of occasions.

Disadvantages

In addition to the views of the public, it is suggested that the study has not given due consideration to the disadvantages which may result from introducing a fully accessible fleet. At present, the only licensing authorities in Scotland who operate fully accessible taxi fleets are Glasgow City Council, Edinburgh City Council and South Ayrshire Council. All other licensing authorities operate a mixed fleet of saloon vehicles and fully accessible vehicles.

There are clear economic considerations which underpin this approach and which have not been given due consideration by the survey. There is no proper analysis of the potential increase in costs which will be incurred by the trade if all taxis require to be fully accessible vehicles. The survey does accept that there is a cost implication, but suggests that this could be alleviated by the staged introduction of a full accessible fleet. Whilst this approach may avoid "a slump in the retail market of saloon vehicles" (paragraph 7.6.2 on page 48)- although it's not entirely clear what evidence this assertion is based upon - it does not address the increased operational costs for a fully accessible vehicle.

Such an increase in costs may well have a detrimental effect upon the service provided to the public. Firstly, it may result in taxi operators surrendering their taxi licence in exchange for a private hire licence so avoiding the increased costs of operating a fully accessible vehicle. This would not improve the quality or access of taxi service to the public. Secondly, increased operating costs for taxis may well result in higher taxi fares. The guidance issued by the then Scottish Office when dealing with the fixing of taxi fares makes it clear that regard should be had to any increase in operating costs when fixing fares in accordance with the Civic Government (Scotland) 1982. It is likely that any move to a fully accessible fleet with the consequent increased costs will result in the trade seeking substantial increases in taxi fares to offset these additional costs.

This is not meant to be an exhaustive list of the potential disadvantages of insisting upon a fully accessible fleet, but an illustration of the potential ramifications of implementing such an approach. It is regrettable that such considerations were not investigated by the Taxi Studies Group prior to arriving at it's recommendation.

Conclusion

In summary, the Assocaition accept the recommendations made by the survey that there is no unmet demand for taxi services in West Dunbartonshire, and that 23 fully

accessible taxis are required in the Dumbarton and Vale of Leven zone to meet the needs of taxi users with ambulant impairment.

The Association does however have serious reservations about the recommendation that a fully accessible fleet be introduced for taxi services in West Dunbartonshire. It is concerned that the survey recommends such a wide sweeping and fundamental change to the operation of taxi services in West Dunbartonshire on the basis of what can only be described as inconclusive and limited information. The Association strongly urges the committee to defer any decision on this issue pending meaningful consultation with all interested parties and a detailed assessment of the potential advantages and disadvantages of introducing a fully accessible fleet.

Pending such investigation, it is proposed that the committee should proceed to implement the recommendations in the study dealing with the issue of significant unmet demand and the need to licence 23 fully accessible vehicles.