

Taxi and Private Hire Vehicle Policy - review of taxi zones and wheelchair accessible vehicles (WAVs)

11 January 2022

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Executive summary

1. Accessibility of transport services and infrastructure is an essential factor in ensuring a high quality, efficient, sustainable transport system. Access to taxis remains a particular challenge, largely due to the structure of the trade and its operations, as well as the design of the taxi vehicle itself. The importance of taxi services in providing reliable door-to-door transport services for disabled people, however, has necessitated concerted focus on this sector across the country.
2. There is a number of challenges facing the taxi trade in the coming years - notably, recovery from COVID-19, the future of electric vehicles in taxi fleets by 2030 and meeting the changing diverse accessibility needs of our communities. This being the case, our intention is to support a move to a longer-term approach, improving services and contributing to a higher quality, more equitable, greener and socially sustainable transport sector. This will necessitate close working with the trade and communities and a dynamic approach to our policy position over the coming years.
3. This study brings together the perspective of various stakeholders and the trade, alongside using data and other information and case studies from previous reports and research, to help inform our future approach. The recommendations emerging from this review, therefore, reflect the range of perspectives gathered in the preparation of the report.
4. The council's ambition is that, by 2030, the hackney carriage taxi trade will have commenced moves to an accessible and environmentally friendly fleet. This means that hackney carriages will have greater numbers of electric vehicles and offer a range of wheelchair accessible vehicle (WAV) options. However, it is recognised that it is going to take some time to work with the trade and to plan and prepare for this transition – not least the merging of the two current taxi zones. Merging the two taxi zones enables West Suffolk to have sufficient WAV provision in the short term to meet demand, while we work and move together towards fulfilling the long-term vision. Therefore, this report recommends a phased approach to achieving our long-term ambition. The hope is that, in so doing, West Suffolk Council, as the regulator of taxi services, can provide a framework for improving taxi services over the medium to long term, and thereby contribute to a higher quality, more equitable, greener and socially sustainable transport sector.
5. It is important that, moving forwards, there is clear communication and understanding around our policy with all stakeholders and it is paramount that West Suffolk Council works with the trade to service the diverse needs of our communities in the short, medium and long term.

Part 1 – Introduction

1. Background

- 1.1 Along with other local authorities, West Suffolk Council works to ensure that taxis and private hire vehicles provide a vital link in the accessible transport system. This includes ensuring that disabled users have access to them and can be confident that drivers and operators will assist and carry them at no extra charge, as is required by law.
- 1.2 West Suffolk Council has responsibility for licensing hackney carriages and private hire vehicles, drivers and operators across the West Suffolk area, ensuring that the vehicles that drivers use and the services they provide are of the highest quality, professional and safe. From the perspective of accessibility, this includes working with trade to confirm that there are:
 - an appropriate number of vehicles operating across the licensing area
 - enough of the right type of vehicle to enable passengers to access them, including those with disabilities.
- 1.3 While there is no current national requirement for WAVs within the hackney carriage fleet, the Government has, for a number of years, been promoting local requirements to provide wheelchair accessible vehicles in taxi fleets. This is because taxis have a key role to play in the provision of door-to-door services for disabled people. Although access to public transport for disabled people in recent years has improved considerably, working with the trade to help ensure taxis provide an accessible service for our communities with a range of needs remains an ongoing challenge. This is because there is no one-size-fits-all approach; the right approach needs to be carefully considered alongside local need, geographic factors and the necessities of the trade.
- 1.4 The Department of Transport: Taxi and Private Hire Vehicle Licensing: Best Practice Guidance (March 2010), at paragraph 14, acknowledges that different accessibility considerations apply between hackney carriage vehicles (HCVs) and private hire vehicles (PHVs) since HCVs can be hired on the spot whereas PHVs can only be booked through an operator. A disabled person should be able to hire an HCV taxi on the spot with the minimum of delay or inconvenience and having accessible taxis helps make that possible.
- 1.5 The provision of WAVs within our hackney carriage taxi fleet and taxi zones has been considered by both the former Forest Heath and St Edmundsbury councils previously and was also part of the plans when these predecessor councils became West Suffolk Council in 2019.
- 1.6 When West Suffolk Council's Cabinet considered reports in September 2020, with regard to the results of an unmet demand survey for taxi services, a commitment was made to undertake a further review of WAVs

and taxi zones prior to any decisions being made around changes to our approach, which forms the basis of this report.

- 1.7 It is important, however, to note that, while this review was commissioned in 2020 by Cabinet, there have since been representations made by the trade about the approach to our taxi policy and this culminated in a protest held by the taxi trade in August 2021. During the course of discussions with the trade following the protest, it has become evident that there are several opinions and concerns with the history of the application of our hackney carriage handbook. This is specifically in relation to WAVs and, also, what vehicle models can be a wheelchair accessible vehicle, in accordance with the guidelines. These have, therefore, all been factored into this review.

(Questions regarding WAV did not originally come from the trade. One member raised concerns during Cabinet (September 2020) about whether West Suffolk was meeting WAV requirements, particularly in Zone A, and, as a result of this, Cabinet asked for us to review why there was lower uptake and what was needed to meet customer requirements. The details can be seen [here](#))

- 1.8 In addition, the commitments that West Suffolk Council has made around the net zero carbon agenda, alongside the Government announcement to ban sale of new petrol and diesel cars from 2030, have meant that it is important to consider the future requirements of the taxi fleet in light of these impending changes. This has also been a consideration as part of this review.
- 1.9 This report draws on a range of data and evidence. It is important to note that the information in relation to vehicle values and costs is indicative to give a broad illustration of the market and allow high level comparison only.

1.10 Current zones and WAV position in West Suffolk

- 1.10.1 Taxi zones is a term used to describe arrangements where a licensing authority licenses hackney carriage vehicles (HCVs) to operate only in a limited zone within the total licensing area. A taxi licensed for one zone cannot lawfully ply for hire outside that zone. Most local authorities allow licensed hackney carriages to ply and stand for hire throughout the entire council area. Only a relatively small number of local authority areas are divided into separate hackney carriage zones. These zones only exist as a result of changes to local authority boundaries in circumstances where two or more former districts are brought together.
- 1.10.2 Currently, there are two taxi zones operating across West Suffolk: Zone A – former Forest Heath District Council (FHDC) and Zone B – former St Edmundsbury Borough Council (SEBC).
- 1.10.3 In terms of overall numbers of wheelchair accessible vehicles across both zones combined, as of August 2021, the values for West Suffolk WAV proportions were:

- 25 per cent hackney carriage vehicles (47 out of 188)
- 23.9 per cent private hire vehicles (81 out of 339)
- 24.3 per cent overall (128 out of 527).

(Please see Appendix I for a detailed breakdown.)

1.10.4 Compared to equivalent national values, West Suffolk has an above average level of hackney carriage WAVs and well above the national average of private hire WAVs. However, that is not to assume that the national average is the 'right' level of provision, purely a measure of what has been achieved or is provided across the rest of England.

1.10.5 When considering the WAV provision within our two zones individually, the picture is different – and this is why considerations around the future of our taxi zones are integral to any decision linked to our WAV hackney carriage requirements. Across West Suffolk, the fleet is subdivided between four main geographical areas, with relatively large distances between places across the district. Breaking down HCV WAV provision across the existing two zones is as follows:

- Zone A (former FHBC) – 11.6 per cent (14 of 121)
- Zone B (former SEBC) – 48.4 per cent (31 of 64)
(Please note that, according to the data, two HCVs are assigned neither to Zone A nor B – this is a fault in the dataset)
- Combined value of 25 per cent.

1.10.6 The comparable resilience of the hackney carriage element of the fleet is something the authority also needs to continue to monitor. This will help in determining the future policy requirements with regard to zones and WAV hackney carriage provision due to a downward trend in terms of numbers of the fleet – please see Appendix I.

(Please note, this is likely due to the peculiarities of the market following COVID-19 – licensees are looking to lower expenses and, if there is no enforced WAV requirement, licensees may be opting for cheaper saloon vehicles.)

1.10.7 With a view to minimise vehicle emissions, the council agreed to set a maximum age of vehicle of 10 years – applying to all vehicles, except electric zero emission vehicles. The age limit of hackney carriage vehicles is due to become policy in 2025 (see section 10.2 below for details), which has been previously agreed through specific consultation and feedback with the industry (please see Appendix D). This is another important factor that needs to be considered alongside any policy decisions made on zones and WAV requirements, particularly linked to the future of electric vehicles.

1.11 Review objectives

1.11.1 Within the context outlined above, this review has been commissioned by West Suffolk Council's Cabinet, to enable the council to consider how it

can provide safe, accessible and high-quality taxi services to residents, businesses and visitors across the whole district, with a particular focus on three areas:

- the future of taxi zones
- the balance of wheelchair accessible vehicles within the hackney carriage fleet
- the transition to a greener fleet.

1.11.2 The objectives of the review are as follows:

- to inform a decision with regard to the future of licensing zones
- to inform a decision on the future policy on wheelchair accessible vehicles
- to inform a decision on whether to add a requirement for new electric vehicles to form part of the fleet.

2. Methodology

Review of previous findings and surveys; Unmet Demand Survey 2019 and feedback on taxi zones as part of the consultation undertaken on the Hackney Carriage and Private Hire Policy Handbook 2020

- 2.1 Following the approval of the Interim Hackney Carriage and Private Hire Conditions Policy Handbook in February 2019, the licensing team committed to carry out a survey of supply and demand for hackney carriage transport across West Suffolk. This unmet demand survey sought to understand if there was any unmet demand for hackney carriages in either of the current zones A (former FHDC area) or B (former SEBC area). Findings from this survey undertaken by CTS Traffic and Transportation Consultants remain relevant and have been drawn upon to contextualise the findings from this review (see Appendix E for full report).
- 2.2 Feedback on taxi zones obtained during the consultation exercise undertaken around changes to the Hackney Carriage and Private Hire Policy Handbook in 2020 have also been drawn upon.

2.3 Consultant led review

- 2.3.1 The interactive elements of this review with both users and the trade have been undertaken by Complete Transport Solutions (CTS) consultant, Ian Millership, who undertook the earlier reviews and unmet demand surveys. His review has been conducted in two parts – a review of taxi zones and a review of our WAV policy.
- 2.3.2 The reason for using an independent consultant was to maintain an objective approach to the review, enabling better engagement with the taxi industry and disability groups. Working in collaboration with the

council, the consultant designed two questionnaires, which were circulated to the industry and disabled users through various engagement channels.

2.3.3 Details of the surveys used can be seen in Appendix F. The majority of the taxi industry in West Suffolk have provided the council with an active email address. For those who could not be reached electronically, a postal address had been provided and those drivers were mailed directly by post. Disabled users were engaged through disability and community groups, such as the Suffolk Coalition of Disabled People (SCODP).

2.4 In-depth review of West Suffolk's hackney carriage taxi fleet

2.4.1 Research into our own fleet has set out the disposition of the industry in West Suffolk, including the ages of vehicles, the proportion of WAVs, mileage and the number of new licensees and a review of our demographics. Full details are shown in Part 3 (and full results can be seen in Appendices I, J, K, L and N).

2.5 Benchmarking and research

2.5.1 In addition to the surveys, extensive research has been undertaken to ensure that the council is able to properly benchmark policy and find best practice where it exists. This work has included:

- reviews of zone amalgamations and WAV policy among other councils across the UK (Appendices G and H)
- reviews of the pricing of vehicles and the availability of alternative WAV vehicles (Appendices I and J)
- research to develop an understanding of electric vehicles (EVs), the requirements of EVs in West Suffolk and the layout of EV infrastructure in the district (see Appendices K and N).

Part 2 – Setting the scene; background to our current policy

3. National perspectives – Government approach to WAVs

- 3.1 In April 2017, various parts of the Equality Act 2010 relating to HCVs and PHVs were enacted, meaning new duties were placed on both drivers and councils around accessibility for passengers in wheelchairs.
- 3.2 The new provisions give councils the power, although not a duty, to maintain a statutory list of designated wheelchair accessible vehicles they license that meet 'such accessibility requirements as the licensing authority thinks fit'. Where councils opt to do so, drivers of HCVs and PHVs designated as being wheelchair accessible must comply with the requirements of Section 165 of the Equality Act 2010, unless they have been issued with an exemption certificate.
- 3.3 Under section 165 of the Equality Act, drivers are obligated to carry out a number of duties. The duties are:
- to carry the passenger while in the wheelchair
 - not to make any additional charge for doing so
 - if the passenger chooses to sit in a passenger seat, to carry the wheelchair
 - to take such steps as necessary to ensure that the passenger is carried in safety and reasonable comfort
 - to give the passenger such mobility assistance as is reasonably required.
- 3.4 Prescribed exemption notices should be issued to new and existing exemption holders and a consistent process for handling exemption applications implemented to support this. Any appeal against a refusal to grant exemption will need to be heard by a Magistrate's court.
- 3.5 In addition, Section 37 of the Disability Discrimination Act 1995 imposes a duty on taxi drivers to carry, without additional charge, a guide dog, hearing dog or other 'assistance dog' when providing a service to a disabled passenger.
- 3.6 Through its role as regulator, the council is required to ensure that local HCV taxi services provide a sufficient number of wheelchair accessible vehicles in accordance with the Disability Discrimination Act and the Equality Act.

4. National perspectives – taxi zones

- 4.1 In 2014, the Law Commission undertook a review into taxi and private hire services. The extensive report discussed taxi zones, the following of

which is relevant to this review (Law Commission – Taxi and private hire services (Page 142/143): can be viewed [here](#)):

- Zones within a licensing area can only be modified by removing them all at the same time and there is no ability to reinstate them when they are removed or to create new zones. Furthermore, there are no provisions to allow for zones to be phased in or out, nor to modify their boundaries.
- Zones can also have a considerable negative impact on taxi services and the Department for Transport’s Best Practice Guidance recommends that they be abolished on the basis that they are of little benefit to the public, require much enforcement and lead to inefficiency and dead mileage.
- On balance, we consider that zones can play a useful role in local taxi regulation; however, they present very serious downsides that may not be sufficiently addressed through general public law constraints on standard setting. We, therefore, suggest that the power to use zones should be subject to a public interest test, on the same basis as we propose in respect of quantity restrictions. This requires the local authority to take into account the interests of consumers, provision for disabled passengers, the impact on congestion and the environment and the sustainability of the industry.
- This reflects the fact that zoning appears to be most sensibly used in conjunction with quantity restrictions, as a tool to encourage provision in outlying areas. For example, an authority may want to introduce a taxi zone with quantity restrictions covering their city centre, but to leave the more rural areas of their district without zones or quantity restrictions. This allows a more nuanced approach to what could otherwise be a restrictive policy.

5. West Suffolk Council’s current Hackney Carriage and Private Hire Conditions Policy

5.1 Definitions

5.1.1 In the context of the taxi industry, WAVs are vehicles that are specially built or converted so a wheelchair user can travel as a passenger, while remaining seated in their wheelchair.

5.1.2 As things presently stand, out of 188 total HCV taxis currently licensed to operate in West Suffolk, 47 are WAVs. Of this number, 14 are licensed in current Zone A and 31 in current Zone B (please see Appendix I for a detailed breakdown).

5.1.3 Since at least 2016, the council (formerly Forest Heath and St Edmundsbury councils) has instituted policy to gradually increase the proportion and number of WAVs in the area. This has been implemented

through a stipulation that all new applications must be for WAVs only. This is set out in paragraphs 5.1 and 6.4 of the current taxi handbook.

- 5.1.4 In addition, to ensure that the vehicles in question are of a suitable quality, the policy sets out that hackney carriage WAVs must be not older than five years on first registration. This is stipulated in Appendix C, paragraph 6.4 of the policy.

5.2 Age of vehicle requirements

- 5.2.1 In the 2020 taxi policy review, the council proposed to add a new maximum age requirement of 10 years to all vehicles, except electric or zero emission vehicles, to reduce emissions.
- 5.2.2 Between 1 and 15 June 2020, feedback was sought from members of the industry on this proposal. Drivers were questioned by email about potential implementation timetables. Responses indicated that there was support for a later implementation option (2025) due to the impact of COVID-19 on the industry and the need for a period of time to recover. This was agreed at a meeting of West Suffolk Council's Cabinet in September 2020.

5.3 Requirement for new hackney carriages to be WAVs

- 5.3.1 The requirement for all new hackney carriages to be wheelchair accessible vehicles is not a recent amendment or change to the West Suffolk Hackney Carriage and Private Hire Handbook. It has been in place for several years and was in both former authorities' hackney carriage and private hire handbooks as follows:
- the 2016 Forest Heath District Council handbook (see page 14, point 2)
 - the 2016 St Edmundsbury Borough Council handbook (see page 17, point 2)
- 5.3.2 'Grandfather rights' are usually granted when there is a change in some legal requirement for a qualification to practise that would affect those already in the industry. There is no evidence to support whether these were ever agreed with regard to the requirement for new hackney carriages to be WAVs in either the predecessor councils' policies or on the formation of West Suffolk Council.

6. Outcomes from unmet demand survey 2019 linked to taxi zones

- 6.1 Following the approval of the interim taxi policy handbook in February 2019, the council committed to carry out a survey of supply and demand for hackney carriage transport across West Suffolk, as part of the transitional arrangements to prepare for becoming a single council.

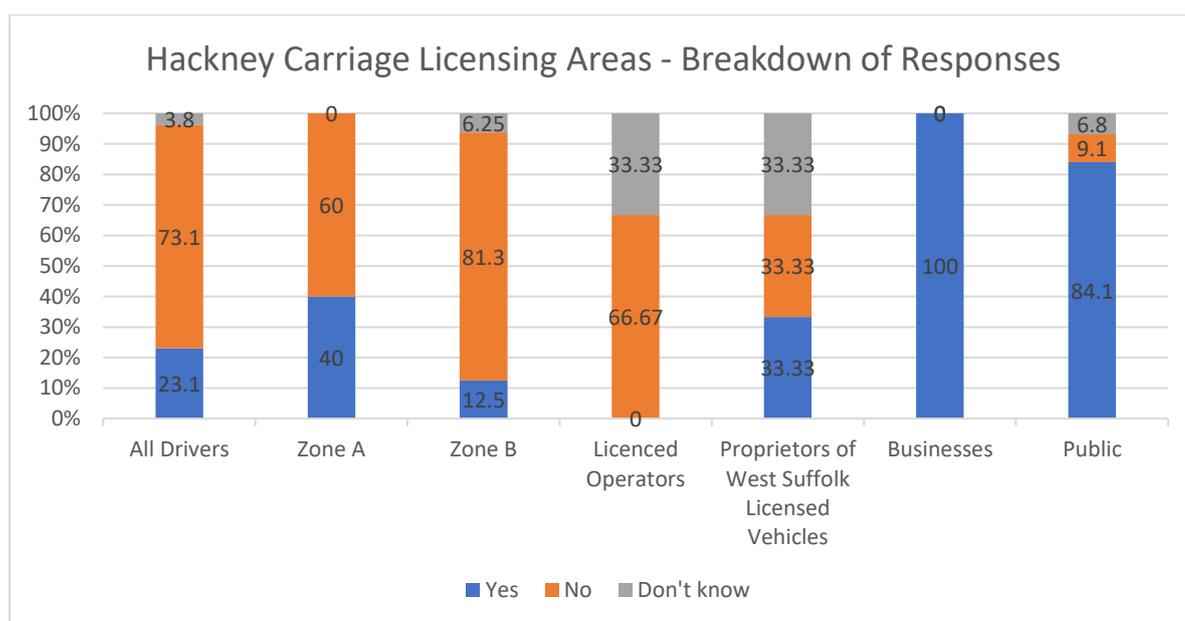
- 6.2 This type of survey is known among the trade as an 'unmet demand survey' and is primarily used by licensing authorities as an evidence base for decisions on whether to limit hackney carriage licence numbers.
- 6.3 The council also used this opportunity to support the wider policy consultation on potentially merging the taxi zones.
- 6.4 This study was published in January 2020 and involved around 195 members of the public and 54 members of the trade.
- 6.5 The survey found that although, as in most places, there was unmet demand, this was far from significant in Zone A and only a little larger in Zone B – but still a long way from a level at which this could be counted significant (please see Appendix E for full survey results). A summary of the key findings are as follows:
- The distances between the four settlements (Zone A – Newmarket and Mildenhall, Zone B – Bury St Edmunds and Haverhill) reduces the likelihood of major moves between the two zones. It also dissuades drivers from taking fares cross zone, as this will necessarily entail their need to return empty – were the zones amalgamated they would be able to better plan their fares, taking to and from both zones, to increase their efficiency.
 - Were the zones to be merged, the study suggested that it may cause issues with local supply. For example, if a taxi takes a passenger from Bury St Edmunds (current Zone B) to Newmarket (Zone A), there is no guarantee they can find a new passenger to take back to Bury St Edmunds, causing a shortfall in supply in current Zone B. Therefore, they may remain in the former Zone A longer.
 - The report identified a potential risk of 'honey potting' if the zones merged. This is because there may be times, such as race days in Newmarket or market days in Bury St Edmunds, where vehicles may flood to a single specific area where business may be more lucrative, leaving gaps in the supply elsewhere (unmet demand).
 - While the impact is unknown, the study acknowledged that there is some risk of unmet demand arising should the zones be merged.
 - This review concluded that 51 per cent of drivers interviewed were opposed to merging the zones and 47 per cent were in favour (page 55, unmet demand survey).
- 6.6 The executive summary of this report, in outlining the future options, stated: "There is only very marginal evidence that combining the zones will lead to any major transfer of hackney carriages between (zones) and on balance from a demand point of view combination of the two zones seems sensible (and should be undertaken over time)".

6.7 While these views and findings are relevant and provide useful background information, it should be noted that the purpose of the unmet demand survey was not to ascertain the risk of amalgamating the two zones or fully explore the implications, but to gauge the relative health of the local service in its current form. As such, the use of this study, as an evidence base for merging the zones, was not robust – hence, the more detailed review that has now been commissioned and the findings of which are discussed in Part 3 of this report.

7. Summary of West Suffolk Policy Consultation 2020 – Taxi Zones

7.1 A council consultation was undertaken between 27 January and 9 March 2020 on the proposed changes to the policy handbook. This was a wider consultation and was not specifically about taxi zones, but in the course of the areas consulted on, some relevant feedback was obtained. The full report can be found in Appendix B.

7.2 The graph below shows the breakdown of responses:



7.3 In summary, the following were findings that provided feedback linked to taxi zones:

- Of 91 responses regarding the move to a single licensing area, 52 (57.1 per cent) agreed to the proposal to amalgamate the zones and 32 (35.2 per cent) answered 'No' to the proposal.
- 73.1 per cent of all HCV drivers (Zone A and B) who responded online were opposed to merging the zones.
- 66.7 per cent of all respondents who were representatives of the taxi and private hire vehicle industry opposed a move to a single zone.

- 22 members of the trade said that the provision of taxi and private hire cars in Bury and Newmarket was already either too high or adequate.
- Opposition was highest in Zone B (81 per cent), with 60 per cent of those opposed from Zone A. However, operators were in favour and other proprietors equally split, but the numbers involved in the latter two categories were not significant.

7.4 Benefits identified by respondents of moving to one zone included:

- common sense approach
- uniform approach that would increase efficiency
- would reduce emissions
- would open up the market
- would be good for the area
- would improve taxis to more adequate level.

7.5 However, reasons for opposing the move to one zone from respondents included:

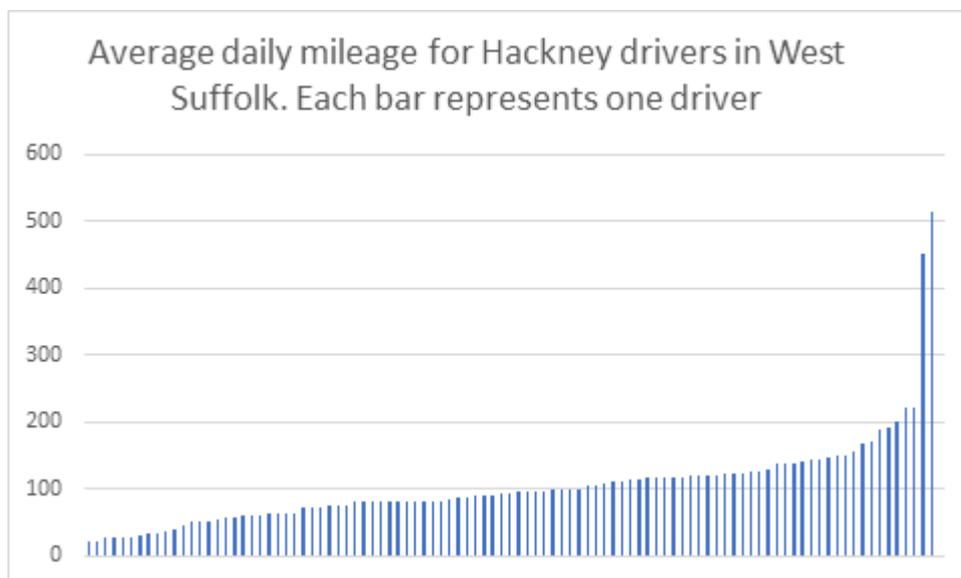
- proposal not viable as would reduce trade
- driver knowledge of new areas would be insufficient
- would favour big companies
- could lead to areas without taxi cover
- would cause disruption
- would not reduce emissions.

Part 3 – Findings and analysis

8. Analysis of data relating to West Suffolk taxis

8.1 Mileage

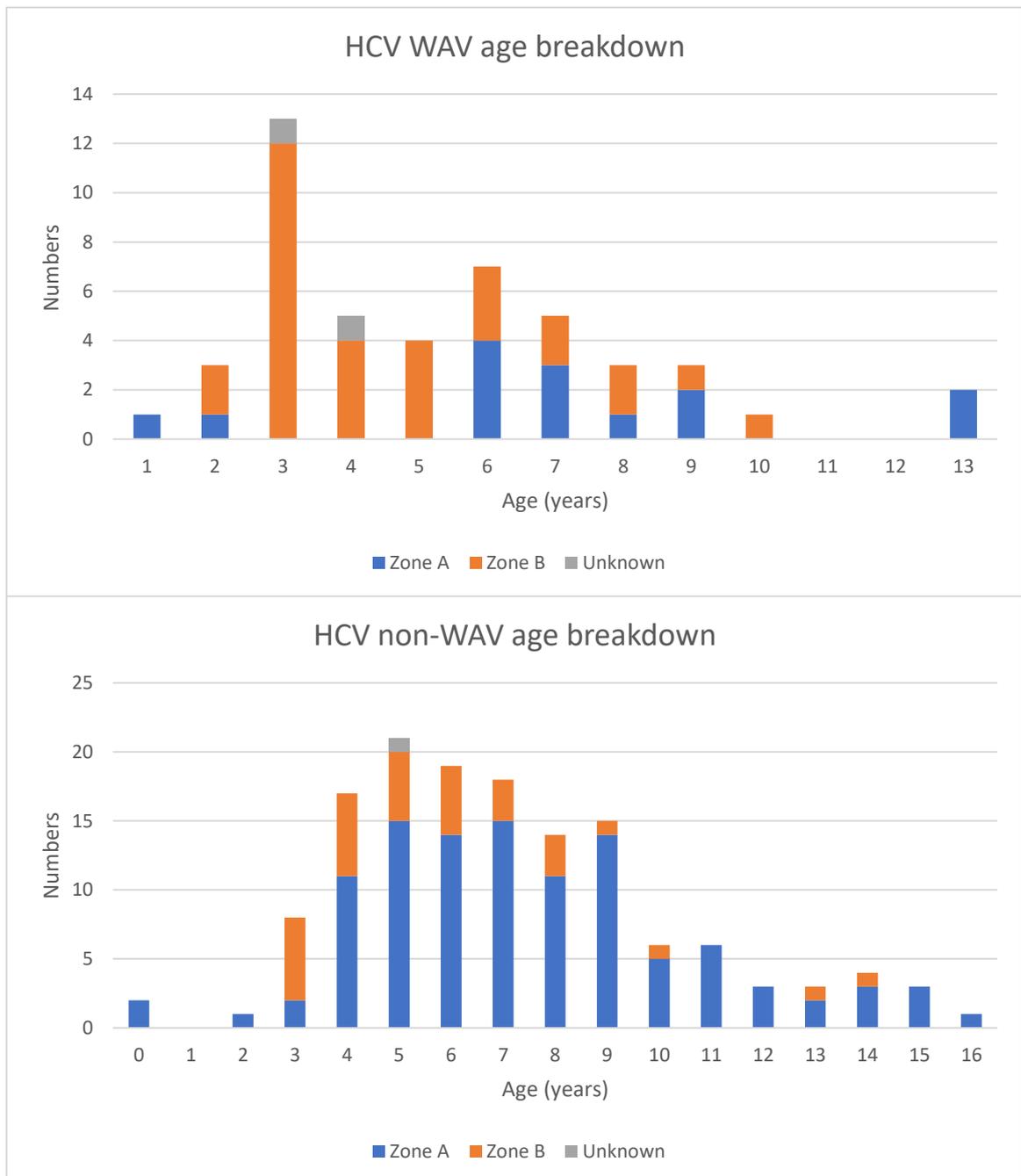
- 8.1.1 A sample of 100 licensees (50 from current Zone A and 50 from Zone B) were picked at random. In order to find mileage information, MOT papers submitted to the council as part of their licensing requirements were reviewed and analysed.
- 8.1.2 To ensure that this data was as unaffected as possible by the unique conditions of COVID-19, but also as 'present' as possible – and thus can be considered close to what could be called 'normal' working – historic mileage readings were utilised. This usually covered two MOTs, one in 2019 and the other in 2020. However, this was not always possible and has been stipulated in the data where necessary (please see Appendix J).
- 8.1.3 In addition, from a 12-month mileage period, the daily mileage was estimated on the assumption that the taxis included were working a five-day week. This, of course, is not always the case (for details, please see Department for Transport statistics paper [here](#)).
- 8.1.4 These caveats aside, the analysis of this information provided interesting data.



- 8.1.5 Based on the full sample (minus the data samples that were considered outliers), the mean mileage per day across the whole district is around 97.5 miles. This is not evenly distributed – Zone A mileage (mean of 112 miles) is on average greater than Zone B (mean of 94 miles). However, this is unsurprising considering the distribution of population centres in the former Forest Heath area compared to St Edmundsbury.

8.2 Age of vehicles

8.2.1 An age analysis of the fleet is necessary to understand the impact of the new maximum age limit. However, an age analysis of all HCVs is complex, especially in breaking down the number of WAVs against the rest of the fleet. Additional attention is paid to vehicles aged seven years or older, due to the current policy to implement a maximum age of vehicle limit of 10 years as of 2025 (and, as part of this, vehicles aged seven years or older will be required to change vehicles to a newer model from this date).



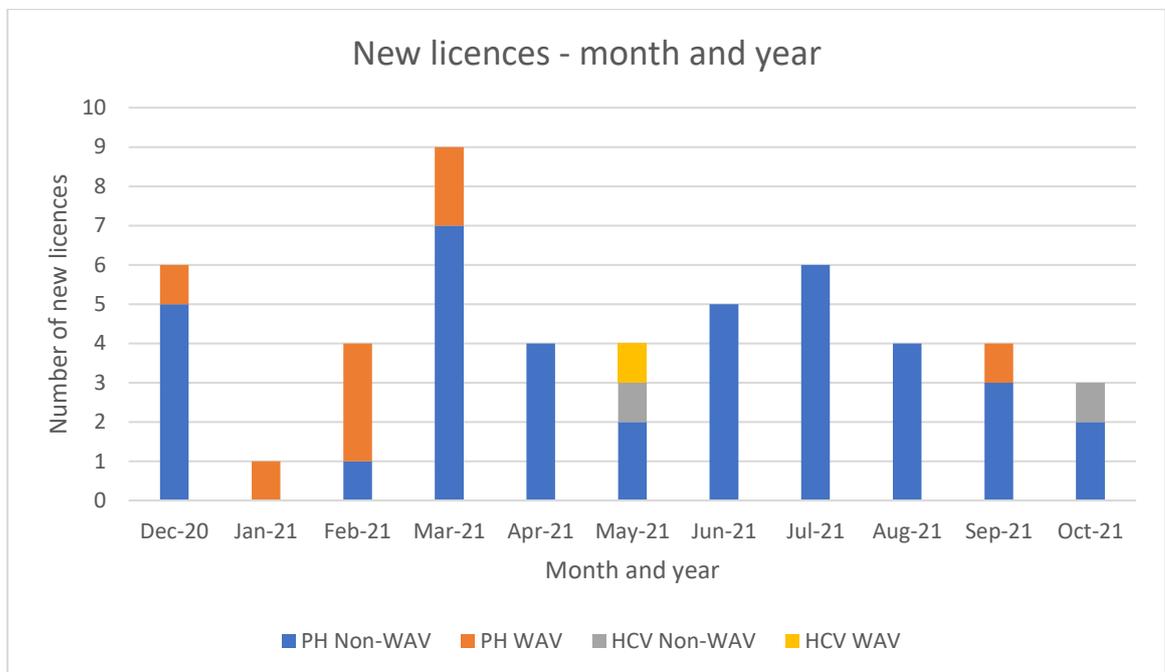
8.2.2 Based on the breakdown and analysis of HCVs, it is clear that current Zone B has a far higher proportion of WAVs than Zone A.

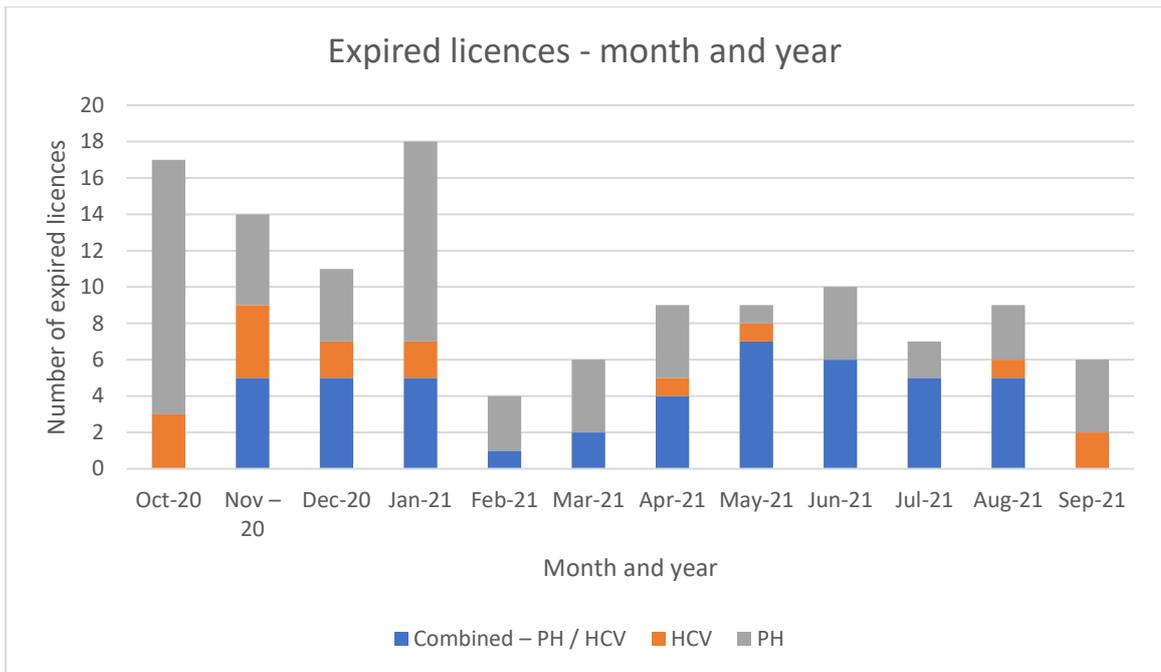
8.2.3 However, based on the age of vehicles in question, if there is no requirement for licensees to utilise a WAV on changing vehicles, it is possible that West Suffolk could lose around a third of its HCV WAVs by 2025 (14 of 47) because of the age of vehicle restrictions. This is particularly stark in current Zone A, where eight of the 14 WAVs in operation in the zone could be replaced.

8.2.4 Analysis of the non-WAV HCV fleet is also illuminating, where 63 of the 107 non-WAVs in operation in Zone A are due to be replaced in 2025, compared to 10 of 33 in Zone B.

8.3 Changes to trade – impact of COVID-19

8.3.1 Analysis was also undertaken to try to ascertain the impact of COVID-19 on the industry over the past 12 months. This was done by comparing the numbers of new licences against the number of licences that have not been renewed (for both HCV and PHV).





8.3.2 The data highlights that new licences issued in the past 12 months trends significantly in favour of PHV over HCV. This could suggest that the PHV market is healthier in comparison to HCV following COVID-19.

8.3.3 This is substantiated further when compared to the expired licences data. Here, you can see that, between December 2020 and September 2021, the total loss to the taxi fleet was 90 licences. Overall, taking into account new licences, this meant that the fleet shrank by 34 licences. When broken down further, this resulted in a loss of 59 HCV and 52 PHV licences (when including combined licences to the total for each). (Please note: many licensees are combined HCV and PHV licence holders. As such, to reach the net loss for HCV and PHV, it is necessary to add combined licences to both. Therefore, the calculation for HCV licences is: 16 HCV licences, plus 45 combined licences, making 61 expired HCV licences. Offset by two new HCV licences within this same time period, this comes to a net loss of 59 HCV licences.)

8.3.4 The HCV fleet has experienced a higher degree of fluctuation (the change in licences account for around 23.9 per cent of all licensees), compared to the PHV fleet (around 13.5 per cent). When compared to regional data, West Suffolk fleet has seen a bigger fluctuation (Department for Transport – Taxi and Private Hire Vehicle Statistics, England: 2021, page 7: can be viewed [here](#)). However, while every effort has been made to ensure that the data is accurate, it should not be considered a precise representation and should be treated with caution and just an indicator of licensing fluctuations in the district.

8.3.5 While this data is useful for a monthly breakdown of fluctuations in taxi licensing, it can confuse matters when it comes to overall numbers. To that end, a comparison of HCV numbers recorded via the public registers on 29 December 2020 and 29 December 2021 suggests that the overall numbers within the HCV fleet have stabilised – decreasing from 191 in

December 2020 to 187 in December 2021 (see Public licensing registers webpage [here](#)).

8.4 New WAVs entering the fleet during COVID-19

8.4.1 It should also be noted that, of the total of new entrants (both HCV and PHV) in the past 12 months, around one in six new licensees opted to use a WAV. While trends are difficult to accurately specify with only a small data sample, and it is difficult to know what impact COVID-19 may have on long term trends, this could indicate that WAV numbers may be maintained at a level of around one in six of the total fleet if no policy levers were to be enforced.

8.5 Current electric vehicles (EVs) within trade and electric vehicle (EV) infrastructure

8.5.1 The current quota of electric or other alternative fuelled vehicles across the fleet is small.

8.5.2 There are a total of 24 vehicles that are not diesel or petrol users. This can be broken down as:

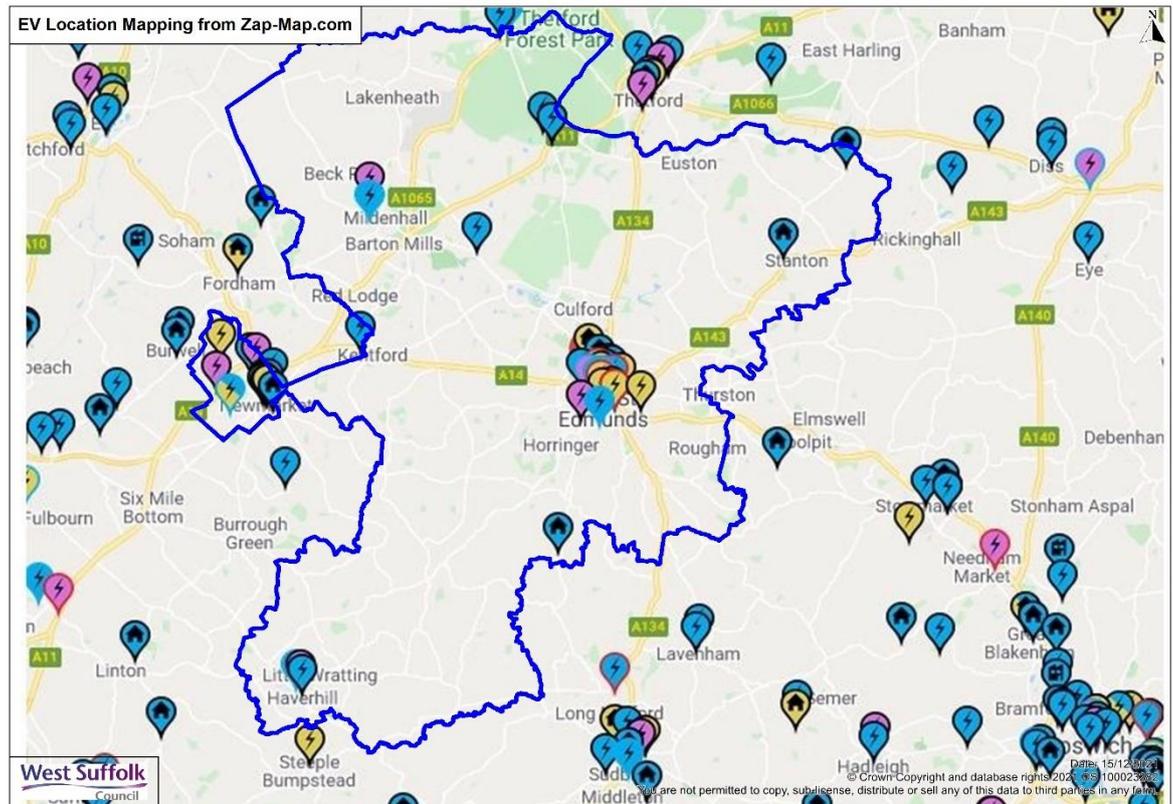
Engine type	PHV	HCV
Alternative fuel	2	0
Electric	5	1
Hybrid	2	2
Hybrid electric	10	2

8.5.3 This sample is too small to indicate anything beyond the obvious conclusion that EV and alternative vehicles are under-represented in the current fleet. However, one HCV driver has provided an interesting insight into the outlook of an EV driver in West Suffolk (please see Appendix N and section 14.5 below). While the driver does not have any concerns over the mileage range of the vehicle, the case study does highlight potential issues arising from the current EV infrastructure, particularly the need for more rapid charging points.

8.6 EV infrastructure in West Suffolk

8.6.1 As can be seen from the map below, the distribution of public and private EV charging points across the area is focused mostly on the main urban centres in Bury St Edmunds and Newmarket, with few in more rural areas.

Illustration 1: All EV charge points in West Suffolk



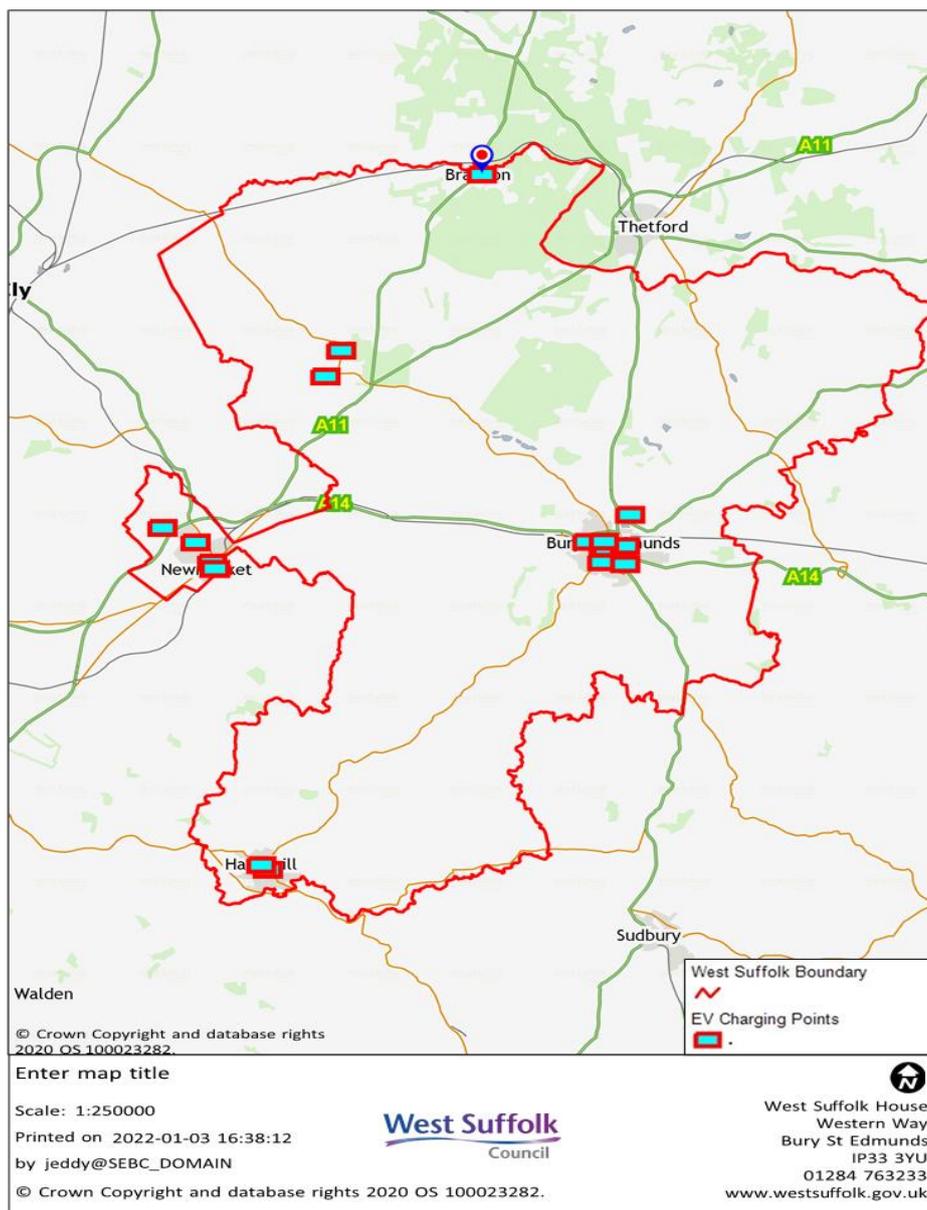
8.6.2 Within Bury St Edmunds, there are 20 charging points available for public use, while in Newmarket, there are 11.

8.6.3 A breakdown of the 19 charging point locations provided by the council highlights the sparsity of provision. (There are 19 EV charge point locations. However, West Suffolk Operational Hub (WSOH) isn't available to the public and Sam Alper Court is just for the use of the occupiers of those industrial units. Therefore, there are 17 publicly accessible locations. At these 17 locations, there are 44 charge points with 69 sockets, capable of charging 66 cars at once.)

Speed	Number of charge point locations	Charging time (full charge)
Rapid – 50kWh	3	Up to 60 mins
Fast – 7.2kWh	10	Up to 7 hours
Slow – 3kWh	6	Up to 14 hours

(For charging time (full charge), please visit Nationwide Vehicle Contracts for detailed calculations [here](#))

Illustration 2: West Suffolk Council EV charge points



8.6.4 It should be noted, however, that West Suffolk Council is planning significant investment into additional EV charging across the district over the next five years. In addition, while charging at a public outlet is useful for additional top up, this information does not take into account home charging – which will necessarily need to account for the majority of charging.

8.7 Data on costs of WAVs and options for types of WAV

8.7.1 A breakdown on the costs of WAVs and other vehicles can be seen in Appendices E and H. This highlights that the cost of popular, larger (second-hand) purpose-built wheelchair accessible vehicles ranges from around £15,000 to £35,000. This compares favourably with potentially smaller WAV capable vehicles (which are similar in size to sport utility vehicles (SUVs) but have a higher ceiling to allow room for wheelchair

users). The cheapest of these, the Fiat Doblo and the Fiat Qubo, come to around £10,000 to £14,500 (second-hand).

8.7.2 These options, however, may require additional costs to convert the vehicles to be wheelchair accessible. However, this comes to around £5,000 to £10,000. (Conversion specialists, Thorntrees Garage, estimate the cost of conversion at around £5,000 to £10,000 – see Thorntrees Garage – how much does it cost to make a car wheelchair accessible [here](#))

8.8 Data on costs of electric vehicles

8.8.1 Information on examples of electric vehicles can be seen in Appendix K.

8.8.2 This research found that, for the most popular electric and alternative vehicles in use for taxi services, the price ranges from around £12,000 to £72,000 (second-hand).

8.8.3 The cheapest option, the Nissan Leaf – which is presently, arguably, the most popular EV taxi vehicle worldwide – offers a range of around 107 miles with an 80 kilowatt (kW) engine. This brings it just within the mean mileage per day of the HCV taxi fleet in West Suffolk. However, the 80kW engine is quite large in comparison with other vehicles and may require more charging time. Nonetheless, a rapid charge point should still be capable of charging the vehicle in around 30 to 60 minutes.

8.8.4 Another option is the Hyundai Ioniq, which has a higher mileage range at 124 miles and should be quicker to charge. However, this option costs more, coming to £18,000 to £20,000 (second-hand).

8.8.5 Considering that popular non-EV saloon and estate vehicles can cost around £11,000 to £25,000 (second-hand), the costs compare favourably.

8.8.6 Nevertheless, it should be noted that both vehicles are hatchbacks and, therefore, may be less attractive options compared to a saloon vehicle. It is also worth highlighting that there are only a few electric WAVs on the market. This would mean an entirely new car purchase (as there are limited options around a second-hand or pre-owned vehicle) and it would then need adapting to become a WAV. (At the moment, there is only one electric wheelchair accessible vehicle for the UK market – and that is the Nissan eNV-200 Envy from Brotherwood. However, it is expected that a better range of electric wheelchair vehicles will be with us over the next couple of years. The cost of a Nissan eNV-200 starts from around £35,000, before full WAV conversion.)

8.9 Demographic factors in West Suffolk

8.9.1 The expected demographic changes in West Suffolk will likely place additional capacity pressures on the taxi industry over the next two decades.

8.9.2 The age group 65 years plus is the only age group projected to increase over the next 20 years, with the proportion of working age people

expected to decline. An increase of 97 per cent is predicted in the population aged 85 years plus between 2018 and 2038.

- 8.9.3 As the 65 years plus age group is the group with the most long-term health problems and disabilities, it is likely that demand for WAVs is going to increase.

8.10 Sale of petrol and diesel vehicles

8.10.1 In November 2020, the Government announced that it would implement a ban on the sale of new petrol and diesel cars from 2030. Between 2030 and 2035, new cars and vans will only be sold if they have the capability to drive a significant distance with zero emissions (for example, EVs, plug-in hybrids or full hybrids).

8.10.2 This was followed up at the 26th meeting of the Conference of the Parties (COP26) in November 2021, where 24 countries and a group of leading car manufacturers committed to ending the era of fossil-fuel powered vehicles by 2040 or earlier.

9. Summary of Complete Transport Solutions (CTS): Traffic and Transportation reports – wheelchair accessible vehicles

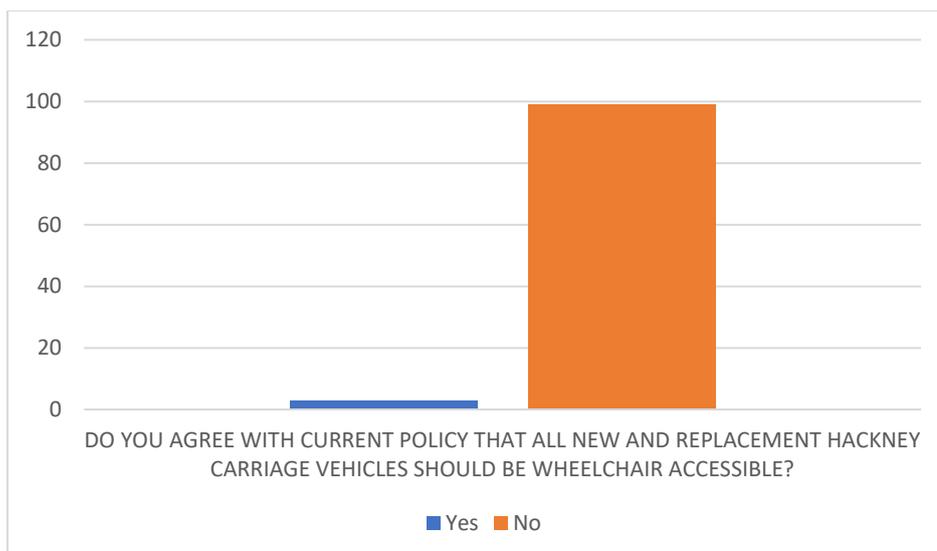
9.1 Overview

9.1.1 The report compiled by CTS Traffic and Transportation provides a comprehensive breakdown of the West Suffolk fleet in comparison to national figures for the proportion of WAVs, taking into account disability statistics – and, from that, estimates the WAV need in the district (please see Appendix M).

9.1.2 The substantive part of the report is based around two surveys: one focused on the trade; the other on user and disability groups. After accumulating evidence, the report concludes that all elements support the assertion that a mixed fleet is best, as it meets the requirements for all kinds of disabilities.

9.2 Trade survey

9.2.1 The trade survey, completed by 103 members of the trade, showed that the trade is primarily concerned with survival, following a difficult period caused by COVID-19. As there are no investment funds available to assist with upgrades, additional requirements – such as a mandatory WAV conversion – would further increase costs. This is exacerbated by the nature of the trade in West Suffolk. While some larger businesses do exist, the majority are either single independent drivers or small businesses, which do not have the capital to make changes or investment rapidly.



9.2.2 The overwhelming view of the trade responding to this survey was that there was more than enough WAVs to meet demand (60 per cent), with a further 27 per cent saying there was just about the right number. 6 per cent felt there were too few and 7 per cent were not sure.

9.2.3 97 per cent of drivers responding did not agree with a policy seeing all new and replacement hackney carriages required to be wheelchair accessible. Several suggested the issue was the need for more funding for WAVs, given that there clearly was no economic market pressure, otherwise more vehicles would already exist. A few suggested the disparity in cost between standard and WAVs was the key element needing to be remediated for by subsidies.

9.2.4 Some 40 per cent of comments against our current WAV policy included drivers saying many of their customers preferred saloon vehicles and had difficulty getting into larger WAV style vehicles. Many said people specifically asked for a 'low step' vehicle. Many felt that having all hackney carriage WAVs would in fact discriminate against more people than the present situation. Several pointed out that many of their wheelchair using customers actually preferred to transfer to the vehicle and have the wheelchair in the boot or elsewhere.

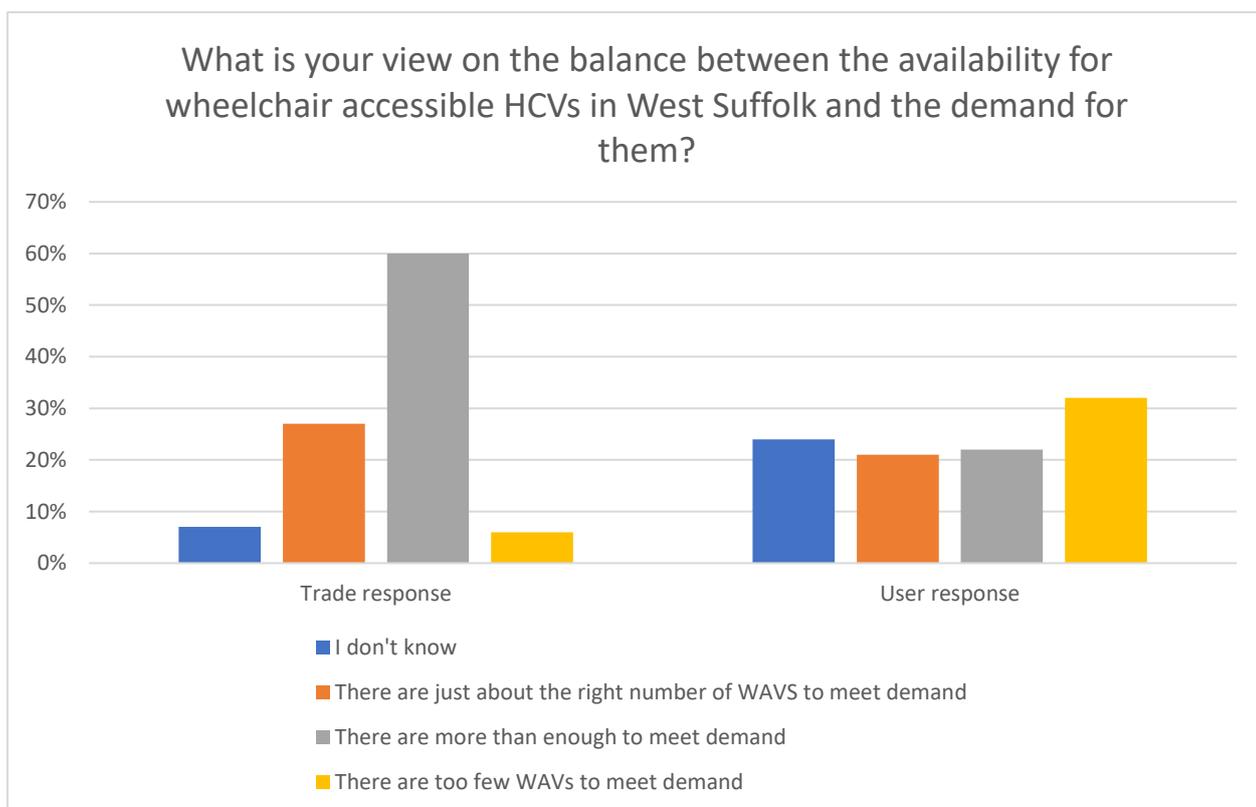
9.2.5 Interestingly, the study also indicated that perception of WAVs in the area is particularly focused on the larger, purpose-built WAV varieties. There is little, if any, understanding or knowledge of smaller kinds of WAV, which can be seen in other parts of the UK.

9.2.6 The trade survey also asked questions around more environmentally friendly vehicles (please see Appendix M for a summary of responses). However, the respondents were mainly concerned with the substantial initial costs of such requirements, rather than potential savings from lower running costs.

9.3 The user survey

- 9.3.1 The user survey, completed by 155 respondents, highlighted that there are shortfalls in the provision of taxis for those with disabilities. While most responses were positive, with 32 per cent stating that 'taxi drivers (both PCV and HCV) usually go above and beyond to assist me', 13 per cent (again for both PCV and HCV) highlighted issues with drivers not understanding needs. A further 10 per cent of HCV and 9 per cent of PCV users stated that 'drivers do not take reasonable steps to assist'.
- 9.3.2 Respondents provided views on the balance between the availability of WAVs and demand for them. 32 per cent of hackney carriage and 28 per cent of private hire users felt there were too few WAVs. However, this is offset by 43 per cent of HCV and 49 per cent of PHV users stating that there were either enough or more than enough WAVs. This suggests that the present fleet is not far off a preferred level of WAV, in the views of users.
- 9.3.3 The survey captured the wide variety of the different disabilities and needs that people have when using taxis, 54 per cent needing walking sticks or crutches, 31 per cent a wheelchair some or most of the time, 18 per cent a wheelchair all of the time, 15 per cent travelling with a carer, 9 per cent with hearing aids, 5 per cent with sight aids and 3 per cent with an assistance dog. Only one of the four respondents using an assistance dog also used a wheelchair, but only some or most of the time, not all of the time.
- 9.3.4 Of total responses in the survey, 59 per cent said they would find it hard to step up into larger wheelchair accessible vehicles and needed a saloon vehicle on this basis. 19 per cent said they were in wheelchairs, but would not require a purpose-built WAV, while 22 per cent said they were in a wheelchair and would need a purpose-built WAV to travel. This suggests that, for our respondents, half of those in wheelchairs would choose not to travel in them.
- 9.3.5 Worryingly, a small number of users felt they had been refused service or mistreated due to unique disability needs and, while the numbers are low, they represent issues that need to be addressed:
- 8 per cent felt they had been refused transport by an operator, which they considered related to their disability
 - 4 per cent booked, but then found the vehicle did not take them when it arrived
 - 2 per cent had been refused as they had an assistance dog
 - 7 per cent were refused as they were in a wheelchair
 - 1 per cent felt they were refused for some other reason
 - 6 per cent considered they had been charged extra because of their disability
 - 16 per cent felt they had been made to feel uncomfortable by a driver arising from their disability.

9.3.6 The graph below shows the findings from the question relating to the availability of WAV HCVs and the demand for them:



9.4 Summary of conclusions extracted from report

9.4.1 All elements support the idea that a mixed fleet is overall best, considering the different needs of disabled users.

9.4.2 Present trade concerns are focused on being able to make ends meet after a time when they have mainly just survived. There is no investment fund available from the present operations to allow any thoughts of upgrading their main tool, the vehicle. This is particularly the case if this is compounded by a move to wheelchair accessible and low emission, which further increases costs and investment levels needed. However, the potential lower running costs of these (EV) vehicles do not appear to be presently appreciated by the trade.

9.4.3 Future stability and planning is critical, and the taxi business is not one that can change particularly quickly, given the high investment cost for the vehicle. Ways need to be developed that can help overcome this. These could be much lower cost and more effective, such as by use of working or demonstration days for both different and more environmentally friendly styles of vehicle. These days would also give significant opportunity for cross-fertilisation of need and ideas between trade, customers and the council.

9.4.4 A very key element in the strategy moving forward is myth-busting. This needs trade, public and council staff and representatives to feel free to

express their understanding and concerns and to challenge facts when necessary. It may, for example, be possible to summarise what vehicles are and are not allowed to be part of both hackney carriage and private hire fleets more graphically.

- 9.4.5 The wheelchair accessible vehicle market continues to develop and several direct links with vehicle providers should be developed and maintained to ensure that West Suffolk Council remains at the forefront of the options available.
- 9.4.6 Provision of cost-effective driver training and education should be developed in a manner that all parties agree would be of benefit.
- 9.4.7 What is clear is that a 'one size fits all' solution is simply not possible in the very complex world of licensed vehicle operations. However, the key is having policies that protect the public from solutions that are not safe, while permitting valid options including development of new solutions and innovation.
- 9.4.8 Although the needs of the travelling public must be paramount in licensing and policy, it is also essential that the individual nature of the trade is recognised and developed. While there are some larger businesses involved in the trade, most suppliers remain private individuals or small companies whose willingness to provide a public service needs to be supported and enabled.

9. Summary of Complete Transport Solutions (CTS): Traffic and Transportation reports – taxi zones

- 9.1 The 2021 zone consultation questionnaire was issued to 695 taxi trade members by email, with a further 47 issued by post on 28 May 2021. For the full report, please see Appendix M.
- 9.2 Forty responses were received, all via the online portal. Three duplicates have been removed, leaving 37 responses. This is just under a 5 per cent response, which is typical for this kind of consultation, but generally low, particularly given the potential consequences of not responding.
- 9.3 General questions were asked to understand the profile of those responding. Of the 36 responses, 61 per cent said they drove hackney carriage vehicles, 19 per cent drove private hire, 11 per cent said they drove both hackney carriages and private hire and 8 per cent said they did not drive any vehicle.
- 9.4 Of those who said they drove either hackney carriages or both kinds of vehicle who provided a response regarding the zone their licence was for, 63 per cent were from Zone A and 37 per cent from Zone B. The proportion of responses from private hire (19 per cent) is, however, much lower than the 64 per cent of the total licensed vehicle fleet that are private hire. This is to be expected given that the zone question is more allied to hackney carriage operation.

9.5 The following is a summary of the key findings.

- Just eight persons responded regarding locations they considered might be honey-pot ranks – ones that would attract vehicles away from less lucrative ranks.
- The strongest concern was from five Zone B respondents who thought the main Bury St Edmunds rank would attract more vehicles. Two said they were concerned more vehicles might be attracted there all the time, with one concerned they would be attracted on Friday and Saturday nights. The other location in Zone B of concern was Haverhill after 4pm. The remaining two responses from Zone A were concerned about more vehicles being attracted to Newmarket. One of these, and one of the Zone B respondents, said this would mainly be on race days. The other respondent was concerned that more vehicles might come to Newmarket at school run times.
- In general, this suggests stronger concern about more vehicles being attracted to the main Bury St Edmunds rank than to any other location based on the responses received.
- The survey found that there are Newmarket-based respondents who would prefer to work in Bury St Edmunds, with a slight counter of one Bury St Edmunds respondent who would like to be able to work race days in Newmarket.
- When asked the direct question about if the zones should be merged or not, 30 of the total respondents gave an answer. A third were in favour and two thirds against merging. When considered by zone, 89 per cent of Zone B responses were against merging, while 60 per cent of Zone A were against zone merging.
- There is a direction of travel towards increasing opposition to merging the zones. For Zone A, percentages against have risen from 35 per cent at the time of the demand survey to 60 per cent in the council consultation and now. For Zone B, the trend is more marked but from a higher start – 70 per cent at the demand survey, 81 per cent at the time of the council consultation and 89 per cent now.

9.6 A summary of the comments made against the merging of the zones included:

- after 18 months of hard times, merging the (ranks) is not a good idea
- the zones should remain as they are, there are more than enough vehicles in each location, everything works fine as it is
- merging would flood Newmarket on race days and leave no vehicles in Bury

- merging will lead to drivers working longer hours, continually moving to where there is an expected high demand
- merging will lead to some ranks being swamped with vehicles that will increase congestion and pollution as others drive around to find rank space
- merging would increase territorial disputes
- knowledge over more ranks would not be good enough to give customers best prices.

9.7 Some comments made in favour of merging the zones included:

- environmental benefits if can get jobs back once having gone to the other zone
- bite the bullet, merge, it will help keep dead miles to a minimum and meet large demand peaks in Newmarket
- often flagged in Bury and Mildenhall when people say they can't get a local zone vehicle.

9.8 The report made the following conclusions:

- Views about merging or not merging the zones are not changing. Those against remain so, as do those for, with this consultation adding a few more to both camps. The level of response remains overall quite low, which implies there are a lot of those involved in the trade who have no opinion either way. There was a desire for stability.
- Overall responses suggest there may be several Zone A drivers that think there is more work generally in Zone B, while the main shortages for Zone A are perceived on race days only.
- It is unlikely any more evidence will be identified that will change the conclusions reached now. It is also clear that the zone issue is an important one, but to a relatively small part of both the hackney carriage and total licensed vehicle trade, with views towards retention strongest.
- The balance of all the evidence supports the two zones being merged. This will give the following benefits:
 - increased flexibility for hackney carriage fleet to meet need anywhere in West Suffolk
 - better opportunity to meet out of course peak demand, such as for the racecourse events
 - maximised opportunity to obtain fares
 - minimised dead mileage
 - removal of any confusion for hackney carriage users within the full West Suffolk area
 - provision of some opportunity for levelling up in terms of the disparity between proportions of WAVs in the two current areas

- a simpler operating environment for new entrants and more opportunity to develop their business.
- Negative impacts could be:
 - some transfer of vehicles between areas
 - potential for over-ranking, particularly at the main Bury St Edmunds central rank
 - potential for clashes between drivers currently meeting particular rank demand and those choosing to change their principal rank
 - possibility that major events might shift all hackney carriages to that event and leave some places short of vehicles
 - drawing of more new entrants into the hackney carriage trade at a time when demand is still rebuilding into the 'new normal'
 - overall introduction of more uncertainty into uncertain times.
- A measure that could be considered to remediate and minimise some of the potential negative impacts could be applying a limit to hackney carriage vehicle numbers for perhaps a two-year period to the combined zone. This would ensure current hackney carriage vehicle owners and operators could determine their responses without the added potential uncertainty implied by adding new entrants at this point in time. There is very little risk that this policy could lead to unmet demand given the headroom observed in both fleets in the present situation.
- Such an option would need commitment to a review of how supply and demand was being met across the ranks of the area within two years, at which point a further decision could be made to remove the limit or retain it for longer. Were negative impacts perceived from this change, the committee has the power to remove the limit at any time without need for further survey.
- The option of reviewing supply and demand within two years may be a worthwhile exercise in any event to provide the committee with hard evidence on how both supply and demand have changed both with the pandemic and with the removal of the zone.
- The decision about the zones can be made separately from the further wider issues being considered, although there will be some marginal impacts on other decisions that need to be taken into account.

10. Experiences of an EV in the West Suffolk taxi fleet

- 10.1 An HCV driver in West Suffolk has provided an account of their experiences driving a EV in the area (please see Appendix N). This account is highly positive, as the range of the vehicle has never caused any significant issue or anxiety on his part. However, the driver does

focus on the need for more EV infrastructure in the area – believing one of the reasons that charging has not been an issue is that demand for charging points is low.

10.2 If there was any significant push towards EVs, which is likely given the national context, demand for EV charge points would increase and result in demand issues.

10.3 The driver also makes the point that increasing infrastructure would make it more likely for other drivers to make the transition to EVs voluntarily.

11. Comparisons with other areas – case studies

11.1 WAV approaches

11.1.1 Investigation into other councils' approaches to WAV policies has highlighted several interesting examples (please see Appendix H). Some findings of note are as follows:

- This is a complex issue with no one agreed approach. In Aberdeen, the council undertook several reviews, initially opting for a 100 per cent WAV approach until 2018, where new evidence suggested a mixed fleet would be more beneficial.
- A 100 per cent WAV approach may not be the best option for all disabled passengers. Torbay and Brighton and Hove councils, for example, both operate a mixed fleet approach. However, the example of Aberdeen emphasises that some mobility-restricted persons cannot enter a WAV. This relates to problems encountered by ambulant disabled or mobility-restricted or elderly passengers when trying to enter WAVs carrying up to eight passengers, which tend to be higher off the road than saloon type vehicles.
- Attempting to institute a mixed fleet approach is not easy. In Torbay, the council attempted to enforce a 20 per cent WAV proportion, initially by implementing an allowance on the age of vehicles that convert to WAV. However, this resulted in problems as new WAV converts did not necessarily have the required additional equipment. Brighton and Hove Council operated a system of managed growth, only allowing five new plates per year, all WAV, in order to steadily increase the proportion of WAV in the fleet. They have been successful in achieving a maintained 50 per cent proportion. However, this is now resulting in issues around 'future-proofing' the fleet – the council is increasingly focused on an EV conversion and the high proportion of WAVs in the fleet hinders this, as there are few viable EV WAV options.
- For those who do opt for a 100 per cent WAV approach, there is a need for good engagement with stakeholders and a gradual approach. Calderdale council, for example, has opted for a 100 per cent approach in response to sustained pressure from disability

groups. The council has publicly emphasised the need for good engagement with the trade and disability groups, as well as a long and engaged consultation. The council would also highlight taking a structured approach to change. As such, a policy whereby new vehicles must be WAVs was considered the most progressive and gradual means to implement the change.

11.2 Zone amalgamation

11.2.1 Research into other recent examples of councils amalgamating zones has emphasised a number of issues around honey-potting and resulting unmet demand. A summary of findings of note are shown below, with full details available in Appendix G. While there is no single resource that can indicate how amalgamation could impact our local area, looking at the actions of other local authorities is interesting. Two case studies are included at Appendix G, although they relate to significantly larger geographical areas and population sizes (both with a population of more than half a million people). The key points to note are as follows:

- Durham Council became a unitary in 2009 and decided to merge its taxi zones in 2011. Since that time, the area has experienced significant honey-potting problems, leading to unmet demand in less lucrative areas and over-subscription in Durham City. The reason for this is likely the disproportionately more lucrative trade in Durham when compared to other towns in the area.
- Buckinghamshire Council, which became a unitary in April 2020 and subsequently amalgamated its zones in 2021, has not experienced any such issues. It should be noted that the council undertook significant engagement on this issue and received feedback on concerns around forming hotspots (or honey-potting). Despite this, the council went ahead with the decision to amalgamate.

12. Discussion of findings

12.1 Preference of a mixed fleet over 100 percent WAVs

12.1.1 While the latest user survey has shown that a third of disabled passengers do not believe the provision of WAVs is satisfactory, it has also been shown through case studies and the CTS report that a 100 per cent WAV fleet does not cater for passengers with other mobility issues.

12.1.2 For a vehicle to be accessible, this does not necessarily mean that it must be capable of carrying a wheelchair. Indeed, wheelchair accessible vehicles can pose difficulties for non-wheelchair using disabled people. For example, those with mobility difficulties may struggle with the high step and raised floor of a purpose-built vehicle. There is a danger of focusing too heavily on the needs of passengers in wheelchairs, perhaps at the expense of those with other, sometimes less obvious, accessibility needs.

12.1.3 Case studies also indicate that a high WAV proportion limits the flexibility of the fleet to adapt to more carbon neutral vehicles at this time.

12.1.4 In addition, the CTS report highlights that there is little variation, and a set mindset among the West Suffolk taxi industry, regarding what constitutes a WAV vehicle, which needs changing. Almost all the WAV vehicles in the HCV fleet are larger purpose-built vehicles. This does not take into account the other options available to members of the industry (as shown in Appendix L).

12.1.5 There is confusion and misunderstanding over what is meant by 'wheelchair accessible vehicle'.

12.2 Grandfather rights and past policies – myth busting

12.2.1 While there are no active grandfather rights within the current taxi policy, and the previous existence of such rights in past policies (for both former Forest Heath and St Edmundsbury councils) is contested, the option to amalgamate the taxi zones offers a clean break with the past. In this way, merging the zones would effectively wipe the slate clean and allow a fresh approach for West Suffolk Council. It would also enable a more equitable provision of HCV WAVs across the district.

12.3 Impact of COVID-19 and the age of vehicles

12.3.1 As shown, the pandemic has caused the taxi service to shrink in size as the industry struggles – this is against the backdrop of likely higher demand in the years to come. As such, focus should be placed on setting out provisions to assist the taxi industry in West Suffolk to navigate these ongoing issues and recover.

12.3.2 The age of vehicle requirement that is set for implementation in 2025 could result in the loss of a number of WAVs. It is, therefore, important to retain some flexibility to implement new WAV requirements and maximise

the efficiency of the current WAV provision across both zones to alleviate any possible short-term loss.

13. Criteria for EV policy changes

- 13.1 The accumulated research on electric vehicles and the current disposition of the fleet allows the establishment of a series of tests that need to be met before the council considers adopting an official approach to EVs.
- 13.2 As set out in Appendix J, the mean range per day of the current HCV fleet is around 97 miles. This can be expanded further, utilising the information in Appendix N, which gives an estimated daily mileage of an HCV EV driver of around 150 miles per day. Charging times, affordability in comparison to other prevalent taxi vehicles and range of popular EVs and other vehicles can be seen in Appendix K.
- 13.3 The disposition of current EV charging infrastructure in the district can be viewed above and Appendix N provides an interpretation of the effectiveness of the infrastructure from a current user.
- 13.4 This information taken together provides the necessary tests that will need to be met, as shown below.

EV tests

	Range (Test within parameters, but not safe)	Affordability (Test safely met)	Infrastructure and charging times (Test not met)
Requirements	97 – 150 miles	Saloon standard: £10,500 to £31,000	Easy access to rapid charging points for c200 HCVs
Current	107 – 124 miles	Hatchback: £12,000 to £20,000 (Nissan Leaf and Hyundai Ioniq)	19 charging points (council) <ul style="list-style-type: none"> • Rapid – 30 minutes • fast – 4 to 5 hrs • slow – 8 hours plus

Part 4 – Options appraisal – exploring the future of our taxi policy

14. Options – future vision

14.1 Putting the findings from this review into the longer-term objectives for the future of the taxi industry, our ambition as the regulator is to work with the taxi industry to ensure the taxi service supports the district through the fast, efficient and reliable movement of people and goods (see Appendix O for the vision). This will be achieved by the following:

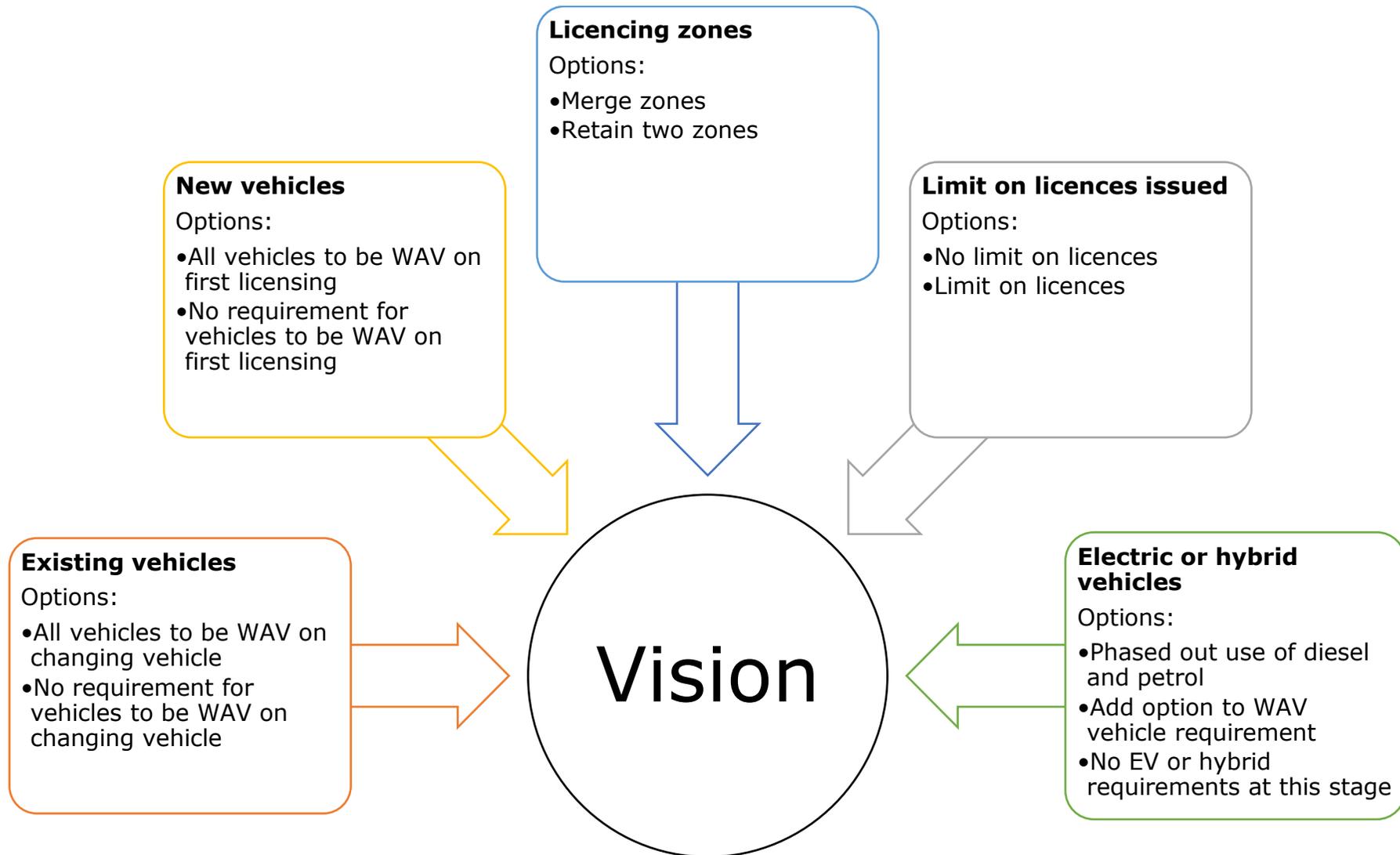
A safe fleet	The industry must safeguard vulnerable individuals by requiring drivers to have appropriate checks and training. The safety standards set by Government must be met, with appropriate equipment and training utilised to ensure that vulnerable residents can be adequately served.
An accessible fleet	The industry will retain sufficient provision of wheelchair accessible vehicles for disabled residents to access shops, services, and other activities. The level of wheelchair accessible vehicles is dictated solely on the needs of local communities.
A green fleet	The fleet will contribute to the reduction of greenhouse gas emissions and the council’s commitment to net zero by 2030, by utilising more environmentally friendly vehicles, such as electric and hybrid.
A thriving fleet	West Suffolk Council recognises the significant contribution that taxi businesses make to the local economy and the role they play in leisure, education, and tourism. As such, the council wishes to provide support to these businesses to grow and flourish, while ensuring they operate safely. The council will always seek to work in a positive partnership by maintaining an open and active forum with licence holders and applicants in a way that minimises the burden and cost of regulation.

14.2 This aligns with West Suffolk Council’s strategic objectives as follows:

Growth in West Suffolk’s economy for the benefit of all our residents and UK plc	Resilient families and communities that are healthy and active
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14.3 When considering the various policy levers that are available to the council (see diagram below), which feed into the viable options, the suggested approach is to find an appropriate short-term solution that enables greater time to plan for the long-term transitions to electric or greener vehicles, while maintaining provision of an accessible and varied fleet. The diagram below summarises how this could be achieved.

Five policy levers



15. Exploring the options

15.1 When considering the policy levers available and translating these into viable options, there are eight options explored below:

Options	
Option 1	Retain existing zones and retain current requirements for all new hackney carriages (for new licensees or on the replacement of the vehicle by existing licensees) to be a WAV.
Option 2	Amalgamate zones and place a hold on number of new hackney carriages entering the trade for two years
Option 3	Amalgamate zones and there is no requirement for any new hackney vehicles to be a WAV or an electric vehicle
Option 4	Amalgamate zones and require only first registration hackney carriages to be either a WAV or an electric vehicle
Option 5	Amalgamate zones and require all new hackney vehicles to be a WAV or an electric vehicle
Option 6	Retain two zones and have no requirement for WAVs or electric vehicles
Option 7	Remove the requirement for all WAVs to be under five years old on first registration
Option 8	Increase the maximum age of vehicle limit to 15 years

Note: It is important to note that, under options 2, 3 and 4, once the change to one zone is made, it cannot be undone and there will be no possibility of any return to two zones at some point in the future. (Paragraph 25 of Schedule 14 to the Local Government Act 1974 enables local authorities to pass a resolution to apply section 171(4) to the whole of their area. This has the effect of creating a single taxi zone throughout said area. However, once zones have been amalgamated in this way, there is no legislative provision for re-creating them.)

15.2 The table below provides an analysis of the various options.

Option 1 – Retain existing zones and retain current requirements for all new hackney carriages (for new licensees or on the replacement of the vehicle by existing licensees) to be WAVs

Benefits	Disbenefits
<ul style="list-style-type: none"> • Continues the current supply of service within the zones. In other words, it maintains the status quo. • Given the inequitable spread of WAVs across the two zones, if two zones are to be retained, the policy around requiring all new hackney carriages to be WAVs has to be maintained or there will not be enough accessible vehicles across the two zones to meet needs. • Allows the option to work with the trade and develop a wider awareness of what WAVs are available and, in so doing, develop a greater variety of WAVs into the fleet. 	<ul style="list-style-type: none"> • Given the long term move to electric vehicles, it is questionable if this is future proof, especially given the 10-year age limit coming in in 2025. • It continues the current situation of inefficiency and greater environmental impact as vehicles have to travel back to their home 'zone' empty as they are not able to ply for hire after dropping a passenger in the other zone (although they could take booked return trips). • The trade is not supportive of the strict adherence to the WAV policy (albeit, in the future, this needs to be considered more broadly). • It does not take account of the opinions obtained through the user survey, which suggested there are enough WAVs and there is a need to have a policy that moves to a mixed fleet provision. • This means that we are not able to consider the future mix of electric or WAVs and look at how policy levers may help achieve this.

Option 2 – Amalgamate zones and place a hold on number of new hackney carriages entering the trade for two years

Benefits	Disbenefits
<ul style="list-style-type: none"> • Allows the fleet to be more competitive, efficient and environmentally sustainable, as they would be able to operate across the whole district – avoiding such issues as empty journeys. • Placing a limit on the number of new licences – or a controlled growth approach – assists the industry by increasing the amount of business each driver can access. • Provides the council a greater level of control following the merger of the zones, potentially avoiding such issues as honey-potting. It also allows the council to stipulate that new licences (that is, new entrants into the trade) be WAVs, should numbers fall. • Moving to one zone may have an impact on over-ranking with the existing fleet and a measure that could be considered to remediate and minimise some of the potential negative impacts. This ensures current hackney carriage vehicle owners and operators could determine their responses without the added potential uncertainty implied by adding new entrants at this point in time. 	<ul style="list-style-type: none"> • Has to be monitored carefully given the fact that hackney carriage numbers have reduced over the past 12 months and there is a need to allow time for recovery from COVID-19. It is possible that this will impact on provision of services for the community, if numbers start to reduce significantly.

Option 3 – Amalgamate zones and there is no requirement for any new hackney carriage vehicles to be a WAV or EV

Benefits	Disbenefits
<ul style="list-style-type: none"> • Moving to a single zone balances out and makes maximum use of the WAV provision that already exists in the former St Edmundsbury and Forest Heath zones, without the need to enforce any policy on WAV provision in the short term. Some people do have difficulty accessing wheelchair accessible vehicles in certain areas, but it was also evident that WAVs do not meet the needs of all people with disability and mobility issues. As such, a mixed fleet of vehicles is required. The current policy does not allow for this, as it requires all newly plated hackney carriage vehicles to be a WAV only. • Research has shown that pursuing a policy of 100 per cent WAVs removes flexibility to adapt to changing circumstances (such as EVs) and does not necessarily cater to the needs of all disabled passengers who require a mixed fleet of vehicles. • Removes financial burden on the industry as it recovers from COVID-19 and allows time to plan for future electric or WAV requirements. • While there are concerns raised by passenger groups, this appears to be as much due to a lack of understanding or training among the industry. • Enables us to have time to re-look at how we achieve a mixed and green fleet by 2030 and consider the best policy levers to help achieve this. We still, however, hold a legal responsibility under the Disability and 	<ul style="list-style-type: none"> • Has to be monitored carefully given the fact that hackney carriage numbers have reduced over the past 12 months. It is possible that this will impact on provision of services for the community, if numbers start to reduce significantly. • There is a lack of knowledge of the range of WAVs available to the trade which offers more flexibility and greater accessibility for users. • Once the zones are amalgamated, it is not possible to reverse the decision. • Research has shown that the age of the fleet could see a large number of WAVs needing to be replaced from 2025. Having no WAV requirement may result in a radical reduction in WAV numbers, resulting in unmet demand (so this has to be considered alongside adopting option 8).

Option 3 – Amalgamate zones and there is no requirement for any new hackney carriage vehicles to be a WAV or EV	
Benefits	Disbenefits
Equality Act to ensure there is sufficient provision in place, which is why we will monitor and review this again in a few years' time.	
Option 4 – Amalgamate zones and require only first registration hackney carriages to be either a WAV or an EV	
Benefits	Disbenefits
<ul style="list-style-type: none"> • Implementing a controlled growth approach, stipulating that new licences must be a WAV, does not place any additional burden on the current industry. This allows the existing drivers to recover from COVID-19, while also helping to ensure that WAV numbers do not fall to an unsatisfactory level. • Improves and lowers emissions from the fleet. 	<ul style="list-style-type: none"> • Creates a financial burden on the industry as it recovers from COVID-19 – less time to plan for a change. • Hard to judge the balance as could end up with electric vehicles, but not enough WAVs in the future. • Approach is inconsistent between new and current licensees and it may be necessary to provide additional information to prospective licensees on alternative WAV options. • The tests are not currently met to safely place an EV requirement on the industry. • Once the zones are amalgamated, it is not possible to reverse the decision.

Option 5 – Amalgamate zones and require all new hackney carriage vehicles to be a WAV or an EV

Benefits	Disbenefits
<ul style="list-style-type: none"> • It is anticipated that, given the long-term vision we are setting out, the trade will be working towards this approach with us now, without specific policy levers being in place. • The electric requirement will be mandated though the national decision to ban the sale of petrol and diesel cars from 2030 and we intend to look ourselves at age limits and emission levels of vehicles that are non-electric and are in our fleet and make further decisions on this by 2025. • Improves and lowers emissions from the fleet. 	<ul style="list-style-type: none"> • The tests are not currently met to safely place an EV requirement on the industry. • At this time, it is not known what the right balance of WAV and electric vehicles needs to be in the fleet and, thus, adopting this now could create the wrong balance in the fleet. • The trade is raising concerns over the need to have time to plan for changes as these types of vehicles can be more costly – this could create short term financial pressure on the trade. • Once the zones are amalgamated, it is not possible to reverse the decision.

Option 6 - Retain two zones and have no requirement for WAVs or EVs

Benefits	Disbenefits
<ul style="list-style-type: none"> • Consistent approach for all vehicles. • Continues the current supply of service within the zone. In other words, it maintains the status quo. • Research has shown that pursuing a policy of 100 per cent WAVs removes flexibility to adapt to changing circumstances (such as EVs) and does not necessarily cater to the needs of all disabled passengers who require a mixed fleet of vehicles. 	<ul style="list-style-type: none"> • The number of WAVs is reducing across the district, but numbers in Zone A are especially low. If the zones are not merged, there is no potential share of WAV provision across the district, and this may result in unmet demand in current Zone A for WAVs.

Option 6 - Retain two zones and have no requirement for WAVs or EVs	
Benefits	Disbenefits
<ul style="list-style-type: none"> Removes financial burden on the industry as it recovers from COVID-19 and allows time to plan for future electric and WAV requirements. 	
Option 7 – Remove the requirement for all WAVs to be less than five years old on first registration	
Benefits	Disbenefits
<ul style="list-style-type: none"> Consistent approach for all vehicles and allows the trade to buy second-hand WAVs. 	<ul style="list-style-type: none"> Approach is inconsistent between new and current licensees and it may be necessary to provide additional information to prospective licensees on alternative WAV options. Allowing HC WAVs to be older than five years when entering the fleet has the potential to cause confusion alongside the wider policy around requirements for HCVs. To adopt this change will require a wider review and, thus, is not recommended at this time. This, however, needs to be part of the review and reconsidered by 2025.

Option 8 - Increase the maximum age limit of vehicle to 15 years

Benefits

- Avoids loss of large proportion of WAVs from 2025.
- Maintains the council's commitment to a green fleet but allows the time for the other factors to be fully developed that support the green and mixed fleet approach.
- In line with effective practice in other local authorities (such as Norwich and Brighton).

Disbenefits

- Does not significantly lower carbon emissions of the fleet in 2025.

Part 5 – Conclusion, recommendation and next steps

16. Conclusion

- 16.1 As part of this review, this report has looked at the demographics of the district and future estimates. It is likely that, in the future, as the population changes, there will be an even greater need for a mixed fleet, with a wide variety of wheelchair accessible style vehicles supporting the accessibility requirements of our communities. This is alongside ensuring that vehicles also support a greener environment (such as a move to an electric fleet).
- 16.2 When considering how we plan for this, there are two major changes in the future that will impact on our taxi policy:
- a change to the age limit of hackney carriage vehicles in 2025 (10-year age limit)
 - a national ban on the sale of petrol and diesel cars by 2030.
- 16.3 The taxi trade needs to recover from COVID-19 and, as a regulator, it is also important to consider how the trade may change as it does so.
- 16.4 At this time, to make a requirement for all new hackney carriage vehicles to be wheelchair accessible and electric is not feasible (option 5) – due to, firstly, the current cost of electric style WAVs and the limited options around models available that would have to be adapted and, secondly, the lack of infrastructure to support this move. There is, therefore, a need to plan for a phased introduction of policy levers over the next few years to achieve our 2030 ambition and, in so doing, work to achieve the right balance of an accessible and environmentally friendly fleet.
- 16.5 It is not feasible to maintain two zones and have no requirements for new hackney carriages to be wheelchair accessible or electric as this does not cater for the wider demands across the district. Thus, option 6 is not viable.
- 16.6 Amalgamating the zones now enables us to maintain in the short term an adequate provision of WAVs across the two zones as we plan for the longer-term transition to our 2030 vision. This enables us to address some of the difficulties faced by taxi passengers in finding wheelchair accessible vehicles, while recognising the concerns raised by drivers about the existing WAV policy – in so doing, balancing out and making maximum use of the WAV provision that already exists in the former St Edmundsbury and Forest Heath areas. The only way that we can achieve this, without having to maintain the policy that forces drivers when replacing vehicles to have WAVs in the short term (option 1), is by making the two areas one zone. This also offers the potential to make

journeys more economical, where drivers can pick up another customer for a return journey – something that is currently prohibited.

- 16.7 On undertaking this approach, West Suffolk Council's WAV provision would be in line with national provision of WAVs. It would also further the findings from our unmet demand survey, which suggests current provision and levels of WAVs across the district as a whole would continue to be sufficient in the short term. This approach allows time for the transition to a more precise policy direction around WAVs and electric vehicles, ready for the change of vehicle age in 2025, and working with trade to plan for this.
- 16.8 Consideration has been given to limiting the number of hackney carriages while the move to one zone takes place (as outlined under option 2) to try and mitigate potential honey-potting. However, given the recent reductions in numbers of hackney carriages, this is likely to be riskier than when a similar approach was adopted in other areas when making this change and, thus, is not recommended. It is also important to note that, if this was undertaken, it could create a black market for selling plates at a high price. This is a policy lever that may be required in the future to achieve the long-term vision.
- 16.9 Consideration was given to allowing HC WAVs to be older than five years when entering the fleet (option 7), but this has the potential to cause confusion alongside the wider policy around requirements for other HCVs. This would necessitate a wider review and, thus, is not recommended at this time.
- 16.10 It is recommended that option 3 is adopted, with a decision around what steps will be required to meet the longer-term plan announced by 2025 at the latest. In setting this direction, the intention is to work with the trade and support them to meet our longer-term aspirations. It is important that the trade bears this in mind when making decisions to change any vehicles in the next three years, pending any future policy change. There would need to be some conditions attached to this being part of our policy to help prevent a black market for plates developing. There would also have to be a caveat for current HCV licences, with regard to transfer rights to say applications would be looked at on a case-by-case basis. For example, if someone is retiring, it would not prevent them selling their business. The conditions that would need to form part of the policy would be:
- registration number (VIN *****) is licenced on plate HCXXX
 - the licence and vehicle linked is for the use of the current named proprietors only – for hire and/or reward
 - the licence cannot be transferred to another or joint proprietors
 - the vehicle licensed cannot be changed for another vehicle at any time (excepting repair or maintenance of less than four weeks)
 - on registration number becoming unfit through wear and tear or damage, the licence plate will immediately lapse.

16.11 On balance, and because of the need to plan for the longer-term changes and allow time for the trade to recover, it is felt that this approach should apply to all new drivers coming into the trade or existing drivers changing their vehicles. Thus, we are disregarding option 4 because it limits the ability to consider electric vehicle requirements.

16.12 It is recommended that option 8 is also adopted. This is to ensure that, in the development of the longer-term ambition, there is not a bottleneck in 2025, where there are a large number of current WAVs in the HCV fleet reaching the proposed 10-year age limit. This will be reviewed again and is a short-term measure allowing the phased approach to reaching the long-term ambition for West Suffolk Council's fleet.

17. Recommendation

17.1 In summary, based on our extensive research, consultation and expert advice, the council is proposing to adopt options 3 and 8. This is a package of three measures that seeks to balance the different priorities of the stakeholders involved.

17.2 The council will now undertake a further consultation exercise to gain feedback on our proposal. Consultees will be asked to respond to each of the three measures but will also have the opportunity to comment on whether they think a different combination of measures would provide a better balance in meeting the different needs of the trade and passengers.

18. Next steps

18.1 As set out in the CTS report, and also illustrated through several case studies, alongside adopting the proposed changes to the policy, the most important next step for the council is to undertake extensive and ongoing engagement with key stakeholders as we work towards the 2030 vision.

18.2 In adopting these proposals, by 2025 the council will undertake another unmet demand survey. It is good practice to undertake this survey every three years and this would enable the council to ascertain the impact of the zones merging on meeting demand and review our ability to cater for the various needs of taxi users. Post this survey, to achieve our 2030 vision, further considerations will then be given as to what policy levers to introduce and when. However, we retain the option of applying to our policy a requirement for new HCVs to be WAVs at any point during this time if we encounter issues or concerns over unmet demand.

18.3 There needs to be a general development of a culture of sharing of experience between the council, trade and users, done in a way that engenders continual growth and improvement across both hackney carriage and private hire industries. This will include:

- developing a training and education programme, using demonstration days to educate the industry and 'myth bust' on WAV variations and environmentally friendly vehicles. These would also provide opportunities to learn from the trade and customers on their needs and ideas
- the council setting out different options for WAVs and EVs – including the PHV EV driver case study – as well as some 'myth busting' information on the council's licensing webpages
- the council seeking to develop links with WAV providers, to ensure that the area remains at the forefront of options and actively promotes the small WAVs that can be utilised
- emphasising and providing cost effective driver training and education around supporting disabled passengers
- gaining feedback from the trade who have electric vehicles and sharing experiences to promote awareness and benefits
- introducing a working group to review vehicle emissions and age of vehicles to inform future policy decision, as well as integrating wider work across the council on provision of electric vehicle charging points.

18.4 The more recent Government changes also include ensuring people could readily and easily report issues to the local licensing authority. Given that people suffering discrimination on the basis of disability often fear recrimination from the small number of potential providers – and therefore worsening of their case and ability to get vehicles – a council 'taxi feedback line' should be considered or user group established, which should emphasise both the reporting of great service as well as the recording of issues. This could take the format of a wider user panel that provides feedback on experiences.

19. Communications and key messages

19.1 The following are the key communications messages that will accompany the recommendations in this report and will be part of an engagement plan with key stakeholders, as well as providing media releases and briefings as required.

- **Addressing the needs of people with disability and mobility issues:** The survey results did show that some people had difficulty accessing wheelchair accessible vehicles in certain areas but, also, that WAVs do not meet the needs of all people with disability and mobility issues. As such, a mixed fleet of vehicles is required. By moving to a single zone, we hope to balance out and make maximum use of the WAV provision that already exists in the former St Edmundsbury and Forest Heath areas, without the need

to enforce any policy on WAV provision. We still, however, hold a legal responsibility under the Disability and Equality Act to ensure there is sufficient provision in place, which is why we will monitor and review this again in a few years' time.

- **Green ambition:** While it is important and must be an ambition to support the growth of a greener fleet of taxis in West Suffolk, we recognise that there are challenges to overcome around charging infrastructure and we are continuing to directly invest or secure investment in this. The Government has announced that the sale of petrol or diesel vehicles is to end in 2030 and we will continue to work with the trade to look at how more electric or hybrid vehicles can be brought into our taxi fleet.

Passenger safety: While we recognise the professional standards of the majority of drivers, the survey of taxi users did highlight some concerns over the treatment of passengers with disability and mobility issues. It is important to us, and public confidence in the trade, that the industry safeguards vulnerable individuals by requiring drivers to have appropriate checks and training. The safety standards set by Government must be met, with appropriate equipment and training utilised to ensure that vulnerable residents can be adequately served.

- **The importance of the trade:** West Suffolk Council recognises the significant contribution that taxi businesses make to the local economy and the role it plays in leisure, education and tourism. The council wants to continue to improve communication with the trade. In order to address some of the difficulties faced by taxi passengers in finding WAVs, and recognising the concerns raised by drivers about the existing WAV policy, we want to balance out and make maximum use of the WAV provision that already exists in the former St Edmundsbury and Forest Heath areas. The only way that we can achieve this, without having to bring in a policy that forces drivers when replacing vehicles to have WAVs, is by making the two areas one zone. This also offers the potential to make journeys more economical where drivers can pick up another customer for a return journey – something that is currently prohibited.

19.2 A full communications plan will be drawn up to support the roll out of this report, including engagement with stakeholders. This will take place alongside the consultation on the changes proposed to the Hackney Carriage and Private Hire Conditions Policy Handbook, as a result of these recommendations.

Appendix A: CAB.WS.20.056 Hackney Carriage and Private Hire Conditions Policy



Hackney Carriage and Private Hire Conditions Policy

Report number:	CAB/WS/20/056	
Report to and date(s):	Cabinet	22 September 2020
Cabinet member:	Councillor Andy Drummond Portfolio Holder for Regulatory Telephone: 01638 751411 Email: andy.drummond@westsuffolk.gov.uk	
Lead officer:	Fiona Quinn Service Manager (Environmental Health) Telephone: 01284 757042 Email: fiona.quinn@westsuffolk.gov.uk	

Decisions Plan: The decision made as a result of this report will usually be published within 48 hours and cannot be actioned until five clear working days of the publication of the decision have elapsed. This item is included on the Decisions Plan.

Wards impacted: All wards

Recommendations: **It is recommended that the Cabinet:**

- 1. approves the maintaining of a two-zone system for hackney carriages in West Suffolk, with a further review to be undertaken within two years.**
- 2. approves the removal of the livery requirement for zone A (former Forest Heath) hackney carriages and not introduce a requirement for private hire vehicles.**
- 3. approves the revised policy, as contained in Appendix A attached, which includes the proposals summarised in paragraphs 6.16 to 7.3 of Report number CAB/WS/20/056.**
- 4. agrees the inclusion of changes introduced by new national safety standards, as set out in section 4.**
- 5. delegates authority to the Assistant Director (Planning and Regulatory) the making of future minor amendments to the policy, in consultation with the Portfolio Holder for Regulatory.**

1. Context to this report

- 1.1 This is an overview paper setting out proposed changes to the West Suffolk Council hackney carriage and private hire conditions policy handbook. These proposals are based upon feedback received from public consultation and feedback from the industry and new national standards.
- 1.2 West Suffolk Council has responsibility for licensing hackney carriage and private hire vehicles, drivers and operators across the West Suffolk area. The current policies that govern the operation of hackney carriages and private hire vehicles, operators and drivers were agreed by Cabinet in February 2019 in preparation to become a single West Suffolk Council. At that point, some more significant changes were deferred to a later date.
- 1.3 Following the approval of the interim hackney carriage and private hire conditions policy handbook in February 2019, the licensing team carried out a survey of supply and demand for hackney carriage transport across West Suffolk. This 'Unmet Demand Survey' sought to understand if there was any unmet demand for hackney carriages in either of the current zones A (former FHDC area) or B (former SEBC area).
- 1.4 The survey found that though, as in most places, there was some minor unmet demand at times, this was far from significant in zone A and only a little larger in zone B, but still a long way from a level at which this could be counted significant. Further, an element of the unmet demand in zone B related to the private rank at Bury station. Both overall levels of rank usage and the overall profiles of demand through the week suggest little difference between hackney carriage rank activity in the two zones.
- 1.5 However, the survey does indicate that there may be times, where one zone has higher and more lucrative demand than the other. Should the zones be merged at this stage, this could cause increased unmet demand and supply issues in smaller towns.
- 1.6 It was agreed in 2019 that the policy would be reviewed within two years to allow for more long-term decisions to be made on the more complex issues discussed when harmonising the two policies of the former councils.
- 1.7 Further changes have been proposed to join up the published policy with the existing application requirements that are currently issued directly to licensees. This involves significantly changing the structure of the policy to ensure it is easy to navigate.

2. Definitions

- 2.1 While there are many similarities between hackney carriage and private hire vehicles, there are also a number of key differences. As such, not all of the proposals set out in this paper apply to both hackney carriages and private hire vehicles.
- 2.2 A hackney carriage is more commonly called a 'taxi'. Hackney carriages are licensed to stand for hire at a taxi rank or can be hailed in the street within the zone they're licensed for (currently zone A or B). Licensed hackney carriages may also undertake pre-booked journeys through a licensed private hire operator and must be wheelchair accessible.
- 2.3 A private hire vehicle is not limited to a particular zone and can work across the whole West Suffolk district. However, they can only be used to complete jobs where the booking has been received by a licensed private hire operator. A private hire vehicle cannot be used to ply for hire, stand on any taxi rank, or be hailed in the street.

3. Proposals within this report

- 3.1 The council set out a list of eight proposals for consultation:
- 3.2 **Proposal 1 – Single hackney carriage licensing area for West Suffolk**
It was proposed to create a single licensing area for the whole district.
- 3.3 **Proposal 2 – Whether to have a hackney carriage livery**
Having a livery for hackney carriages holds several advantages. However, it could also mean a cost of £300 for a boot and bonnet wrap; a vehicle re-spray; or the earlier replacement of a licensed vehicle, depending on the livery option and implementation timetable chosen.
- 3.4 **Proposal 3 – Whether to have a private hire vehicle livery**
Having a livery for private hire vehicles (alongside door signs) could help customers identify them and distinguish them from hackney carriages. On the other hand, a livery would involve a cost to some or all drivers.
- 3.5 **Proposal 4 – Age of vehicle, including maximum age of vehicle**

The Council also proposed to add a new maximum age requirement of 10 years to all vehicles, except electric-zero emission vehicles, to reduce emissions.

3.6 Proposal 5 – Engine capacity requirements for private hire and hackney carriages

The council proposed to update engine capacity requirements to allow flexibility for alternatively fuelled vehicles. This is to encourage more environmentally sustainable vehicles on the road.

3.7 Proposal 6 – Vehicle tests and inspections

To add test and inspection requirements for hackney carriages so temporary replacement vehicle conditions are consistent with wider vehicle conditions. In addition, the council proposed to update vehicle testing requirements for hackney carriage and private hire vehicles, so timing fits in with the annual licensing renewal process.

3.8 Proposal 7 – Convictions policy

To increase the amount of time elapsed following certain convictions before a licence application can be considered.

3.9 Proposal 8 – Other minor changes

A series of other small changes (please see Appendix B for details).

4. New Government safety standards

4.1 The statutory taxi and private hire vehicle standards were released on 21 July 2020 by Government. The document's primary focus is on protecting children and vulnerable adults. However, it, also, includes a number of other requirements intended to ensure that all passengers are guaranteed greater safety.

4.2 The Government has set out a requirement to produce a written report within six months evidencing the council have addressed the recommendations, ensuring that standards are incorporated.

4.3 Most of the recommendations included in the document are already covered by West Suffolk's hackney carriage and private hire conditions policy. However, there are certain areas, such as training for decision-makers – which is intended to ensure decision-makers are fully cognisant of safeguarding implications for children and vulnerable adults – and the joint authorisation of enforcement officers, which will now be included.

- 4.4 The most substantive alteration required that directly affects drivers is the need for additional criminality checks, with a requirement that licensing authorities should carry out a check of the children and adult Barred Lists in addition to being subject to an enhanced Disclosure and Barring Service (DBS) check.
- 4.5 Due to the release of the document at short notice, there has been no time to consult with the industry on the changes. However, the industry will be informed of all additional alterations via the taxi forum. As such, it is proposed that necessary minor alterations be agreed by Cabinet.

5. Alternative options that have been considered

- 5.1 The alternative options are:
- to agree to implement all proposals as set out in the public consultation, including instituting a single zone and livery requirements for hackney carriages and private hire vehicles. However, this would go against the feedback received from members of the industry; and
 - to implement only the changes required by the Government's new 'Statutory Taxi and Private Hire Vehicle Standards'.

6. Consultation and engagement undertaken

- 6.1 A consultation was held between 27 January and 9 March 2020. This included an online survey, supplemented by face-to-face events with the trade (please see Appendix B for details).
- 6.2 Of a total 95 respondents who responded to the survey online or in writing, the largest group were members of the public (46.8 per cent). 44.7 per cent responded to the survey as representatives of the hackney carriage and private hire industry. Of this number, the highest proportion identified as drivers from zone A (former Forest Heath District Council (FHDC) area) (11.7 per cent) and zone B (former St Edmundsbury Borough Council (SEBC) area) (17 per cent).
- 6.3 **Survey responses to Proposal 1: Licensing Area – split between public and industry**
100 per cent of respondents representing businesses and 84.1 per cent of members of the public were in favour of a single licensing area. 73.1 per cent of all drivers (zone A and B) who responded online were opposed to the proposal. 66.7 per cent of all respondents who were representatives of the hackney carriage and private hire industry also opposed.

- 6.4 In this instance, it should also be noted that there were 105 responses, which were not included in the main analysis of responses as they were incomplete, with a majority providing no information and no responses to survey questions. However, 45 incomplete respondents did answer the question regarding moving to a single zone system.
- 6.5 While the split between members of the public and members of the industry remains, these additional answers alter the high level analysis of this survey question: of 136 responses, 68 (50 per cent) were in favour of the proposal to merge the two taxi zones; 54 (39.7 per cent) were opposed and 14 (10.3 per cent) responded 'don't know'.
- 6.6 **Survey responses to Proposal 2: hackney carriage livery – split between public and industry**
52.8 per cent supported the use of a livery. 63.8 per cent of respondents who supported the adoption of a livery were members of the public, with businesses the next largest group at 17 per cent.
- 6.7 42 respondents preferred no livery requirement. 69.1 per cent of this number were representatives of the taxi and private hire industries. 31 per cent were members of the public.
- 6.8 The most frequently cited reason for opposition to livery is the expense to the industry. 19 responders highlighted this issue, with two also stressing a potential reduced vehicle sell on value. 13 suggested that hackney carriage cars already have sufficient identification.
- 6.9 **Survey responses to Proposal 3: private hire livery – majority opposition**
Of 85 responses, 64.7 per cent of all respondents selected the option for there to be no livery requirement for private hire vehicles. 47.3 per cent were members of the public; a total of 50.9 per cent of respondents were members of the taxi and private hire industry.
- 6.10 **Survey responses to Proposal 4: age of vehicle – split between public and industry**
47.8 per cent of 92 responses were in favour of the proposed decrease in maximum age of vehicle to 10 years, 41.3 per cent were opposed. 68.2 per cent of those that selected 'yes' in the online survey were members of the public, with 14.6 per cent representing businesses.
- 6.11 76.3 per cent of respondents that opposed the age of vehicle proposal were industry representatives. 21 per cent were members of the public and 2.6 per cent were business representatives.

6.12 Between 1 and 15 June 2020, further feedback was sought from members of the industry on Proposal 4. Drivers were questioned via email about potential implementation timetables. Responses indicated that there was support for a later implementation option (2025), due to the impact of COVID-19 on the industry and the need for a period of time to recover. Please see Appendix C.

6.13 **Rationale for decisions**

Analysis of the consultation shows that, of the responses, there is significant opposition from drivers and other members of the industry to proposals 1, 2 and 4, as well as majority opposition to proposal 3. In addition, the Unmet Demand Survey indicates that there may be the unintended consequence of reducing supply in some towns due to lucrative areas being favoured (please see Appendix D for more information).

6.14 While changing Proposal 1 in response to the feedback received does not contradict council priorities, Proposal 4b has a direct benefit to lowering emissions. Given the uncertainty of the impact of COVID-19 on the trade and that once implemented it cannot be reversed, it is suggested that the initial Proposal 1 is reviewed in two years' time.

6.15 It is for this reason that it is recommended that the council agree to maintain a two-zone system in West Suffolk, to be reviewed in two years, and remove the livery requirement for zone A (former Forest Heath) hackney carriages and not introduce a requirement for private hire vehicles.

6.16 In addition, it is proposed that the council:

- introduces the maximum age of vehicle proposals
- introduces all other minor proposals that were consulted on.

7. **Additional concerns**

7.1 **Removing livery requirement for hackney carriages - implementation**

Implementation of this policy will be immediate upon agreement by Cabinet. However, there will be allowed a 'phased' transition for vehicles in zone A – with the industry able to remove livery gradually as they replace their vehicles over time.

7.2 The council will review on a case-by-case basis as some livery is by film wrap which can be more readily removed. This will mean that the industry will not incur any additional costs and will in fact incur fewer expenses as they no longer need to pay for livery on new vehicles. In addition, these cars will have a higher resale value (as they do not

have to be repainted to remove the livery), once they have reached their maximum age limit for use as taxis.

7.3 **Hybrid electric vehicle age**

The proposed policy provides a framework of requirements and conditions through which West Suffolk wishes to regulate the licensing of vehicles and drivers. However, this does not prevent drivers from approaching the council with a scenario such as the wish to licence an electric vehicle greater than five years old accompanied by an appropriate evidence base that it could meet the aspirations of the council. In instances such as these, the decision would be considered on a case-by-case basis. This is now reflected in the policy.

8. Risks associated with the proposals

- 8.1 Potential risks relating to the decision to merge the Taxi zones at this time are set out in Appendix D.

9. Implications arising from the proposals

- 9.1 Financial:

- 9.1.1 If the proposal setting a maximum age of vehicle is implemented, there may be a financial cost to taxi and hire car companies – drivers with vehicles currently aged over 10 years, who will be required to replace their vehicle before date of implementation. (The current cost of a new purpose-built hackney taxi (manual) is approximately £37,330. However, resale value for hackney carriage vehicles aged over 10 years old is around £800 to £2,000.) However, this can be managed if implemented at the date of annual renewal of the vehicle licence. The council also needs to allow the industry a lead in time to allow them to adjust.
- 9.1.2 If recommendations followed regarding hackney carriage livery, there will be no additional cost and reduction in cost for zone A hackney carriage vehicles. If **all zone livery was** adopted, there will be a cost to drivers to purchase a black vehicle (note black is a standard colour therefore there is no additional cost) and approximately £350 per vehicle to add a yellow wrap.
- 9.1.3 Cost of additional engagement programme with taxi industry regarding the potential amalgamation of the taxi zones: £1,400 plus VAT (total £1,680). This programme is to include targeted briefing and engagement with the industry, as well as the production of a clear short report summarising views and making an independent and reasoned recommendation for the way forward with respect to zoning. It is intended that this process is concluded and brought back for a Cabinet decision by April 2022.

- 9.2 Legal compliance: There is no legal requirement to implement changes.
- 9.3 Equalities: There are no inequalities requiring detailed assessment.
- 9.4 Environment or sustainability: Proposals four and five are intended to ensure vehicles have functioning and up to date technology to reduce emissions. There will also be a reduction in paper by removal of requirement to have a printed copy of policy in all licenced vehicles.
- 9.5 Changes to existing policies: This will entail a change to current policy.

10. Appendices referenced in this report

- 10.1 Appendix A – Revised hackney carriage and private hire conditions policy
- 10.2 Appendix B – Consultation analysis
- 10.3 Appendix C – Additional proposal 4 survey analysis
- 10.4 Appendix D – Rationale to defer amalgamated taxi zone

Note: Due to the length and file size of the documents, the appendices are only available electronically with the agenda papers for this Cabinet meeting, at the following link [here](#).

Any members wishing to obtain a paper copy may request a pack directly from Democratic Services.

Appendix B: CAB.WS.20.056

Taxi licensing policy handbook – consultation analysis

Background

1. Public consultation took place between 27 January and 9 March 2020 on the proposed changes to the West Suffolk Council Hackney Carriage and Private Hire Conditions Policy Handbook.
2. West Suffolk Council currently licenses all hackney carriage and private hire vehicle businesses within the district. Separate licences are required for vehicles, drivers and operating companies. The policies that set out what is required of taxi drivers and operators are set out in a document known as the West Suffolk Council Hackney Carriage and Private Hire Conditions Policy Handbook.
3. In line with the creation of a single West Suffolk Council in April 2019, a new licensing handbook was produced that brought together the previous requirements of the two predecessor licensing authorities – Forest Heath District Council (FHDC) and St Edmundsbury Borough Council (SEBC).
4. Following consultation, almost all sections of these predecessor policies were aligned, except for some requirements. It was agreed that these should be addressed in more depth following the creation of West Suffolk Council.

Methodology

5. During the consultation period, views were sought from the public, drivers and businesses regarding new requirements for a single licensing area, vehicle age, livery, time elapsed following convictions and other minor changes.
6. An online response form was created and this was published through media, website, social media, councillors, staff and partner organisations.
7. In addition, the consultation was discussed at the new drivers forum on 17 February and the consultation was circulated among councillors. Further drop in sessions in Mildenhall and Haverhill were held on 27 and 26 February respectively.
8. At the time the consultation closed, 80 online forms had been completed. The number of complete hard copy surveys submitted was 15. This report outlines the results from the analysis of quantitative data and themes that can be drawn from the qualitative (free text) data. In total, therefore, this report reflects feedback from up to 95 different submissions.

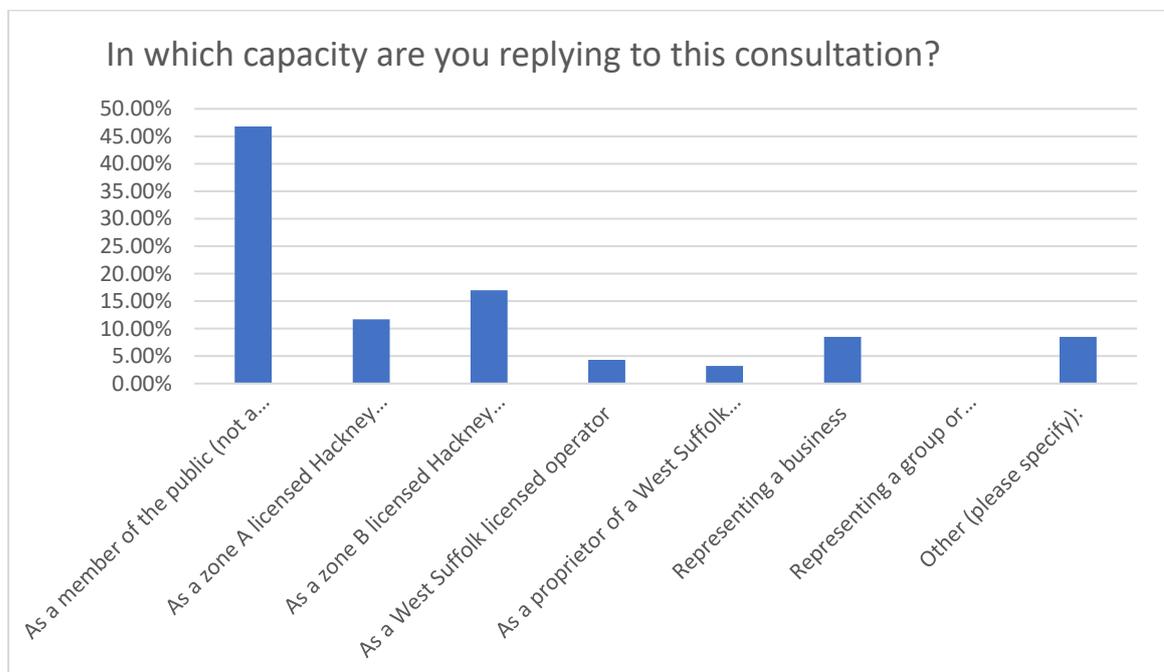
9. Section 1 of this report outlines the type of respondents who took part. Sections 2 to 4 outline the specific results for the zoning, livery, vehicle and other proposals.

10. Please note:

- all answers are listed in descending order (except equality monitoring questions which remain in standard categories)
- a large part of the survey was made up of free text responses. These have been analysed using standard manual techniques for free text analysis which, while highly effective, are unable to eliminate any degree of judgement or subjectivity.

Section 1: About the respondents

11. Of a total 95 respondents who responded online or in writing, the largest group of respondents were members of the public (46.6 per cent). 44.7 per cent responded to the survey as representatives of the taxi and private hire car industry. Of this number, the highest proportion identified as drivers from zone A (former FHDC area) (11.7 per cent) and zone B (former SEBC area) (17 per cent). Due to irregularities in the way some of the written consultation submissions were completed, some respondents selected more than a single option for this category. These respondents, and an additional individual responding as a private hire driver, are registered under 'Other' and all are members of the taxi and private hire vehicle industry (8.5 per cent).

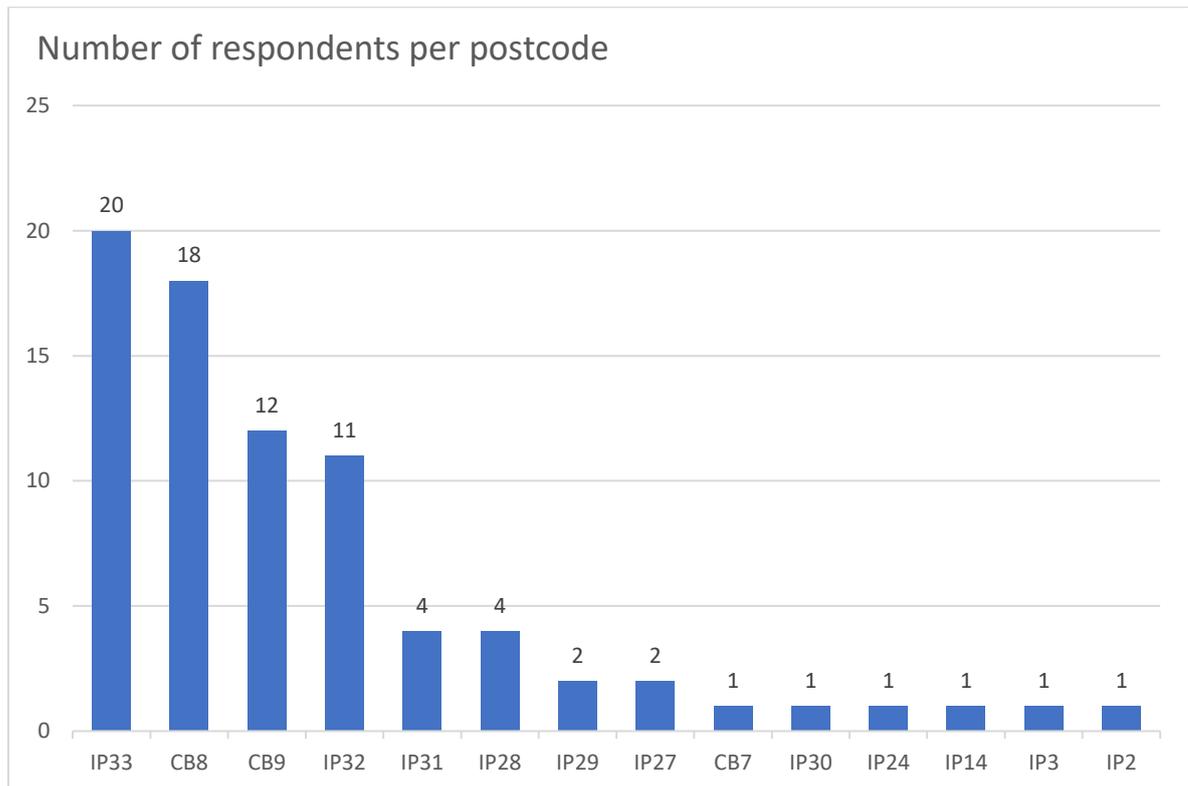


The graph highlights that the largest single group of respondents were members of the public at 46.6 per cent. 8.5 per cent of respondents

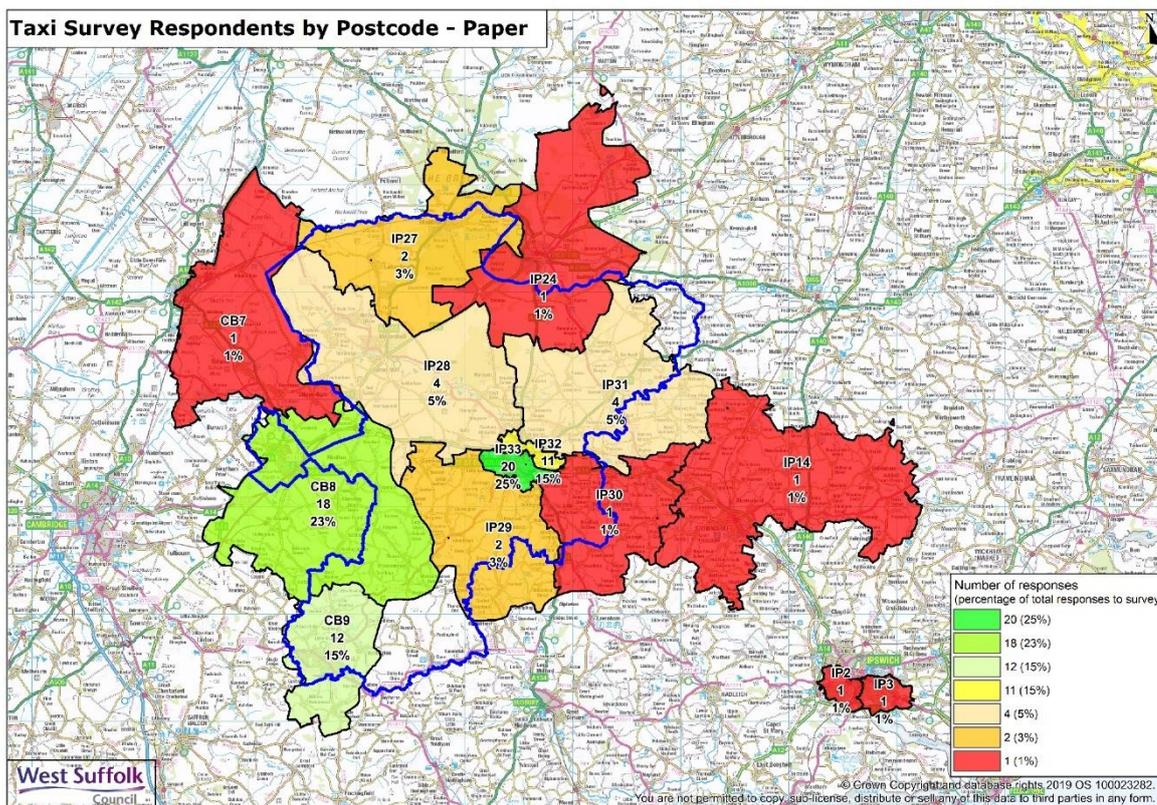
represented a business, with the other 44.7 per cent representing the taxi industry in various forms.

Respondent location

12. 91.5 per cent of respondents are residents of West Suffolk. 86 of 95 complete responses (91.5 per cent) show that most respondents lived in IP32 and IP33 (Bury St Edmunds) and CB8 and CB9 (Newmarket).



The graph shows that the majority of respondents were residents of the Newmarket and Bury St Edmunds areas.



The map further illustrates that the majority of respondents were residents of the Newmarket and Bury St Edmunds areas.

Gender

13. The survey was completed by more males than females, with men accounting for 60.7 per cent of respondents, compared to 37.1 per cent who were female. The remaining respondents did not disclose their gender.

Age and health or disability

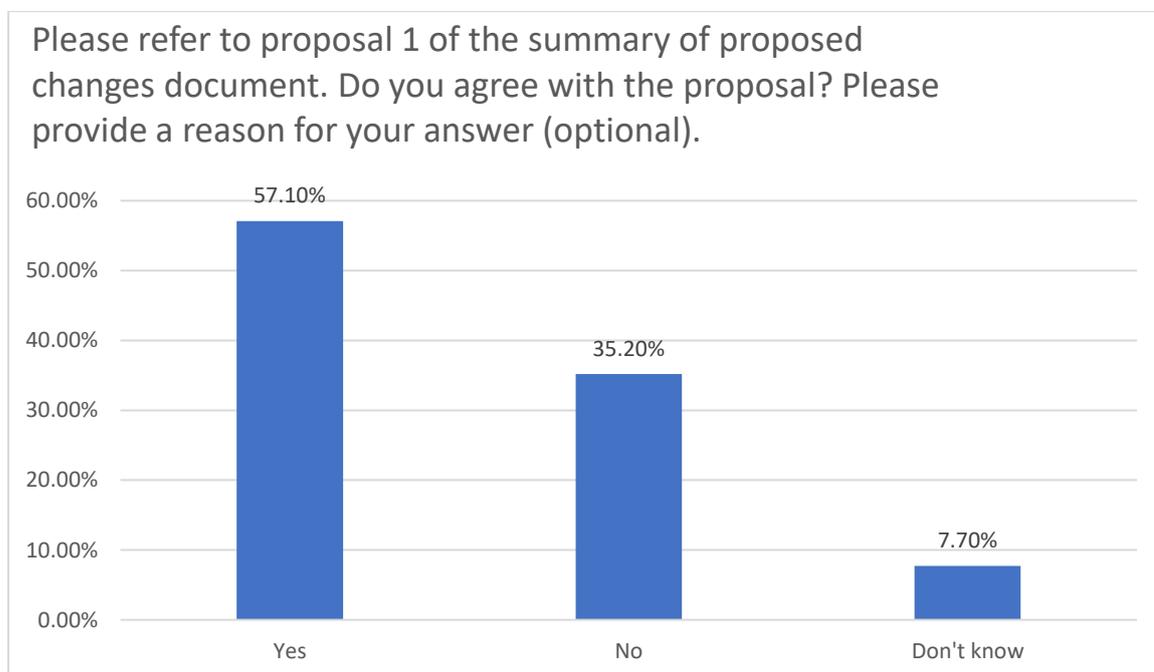
14. The age breakdown (see chart below) demonstrated that a larger proportion of older people completed the survey; ages 35 to 70 and over represents nearly 80 per cent of the total. There is no representation from those aged under 18, with very few 18 to 24-year olds also. 12.4 per cent of respondents also stated that they had a longstanding disability, illness or infirmity, which is below the Suffolk average of 18 per cent – this is taken from the 2011 'Census data – Day to Day activities': 10.1 per cent limited a little; 7.9 per cent limited a lot.

Age breakdown of respondents		
Age category	Percentage in each category	West Suffolk percentage (2018)
0 to 17	0	21.1
18 to 24	4.6	7.7
25 to 34	17.2	13.8
35 to 44	29.9	11.5
45 to 59	26.4	19.5
60 to 69	16.1	10.9
70 and over	5.7	15.5

Section 2: Question 5

Licensing areas

15. Proposal 1 refers to creating a single licensing area in West Suffolk. Of 91 responses, 52 (57.1 per cent) agreed to this proposal. 32 (35.2 per cent) answered 'No' to the proposal.



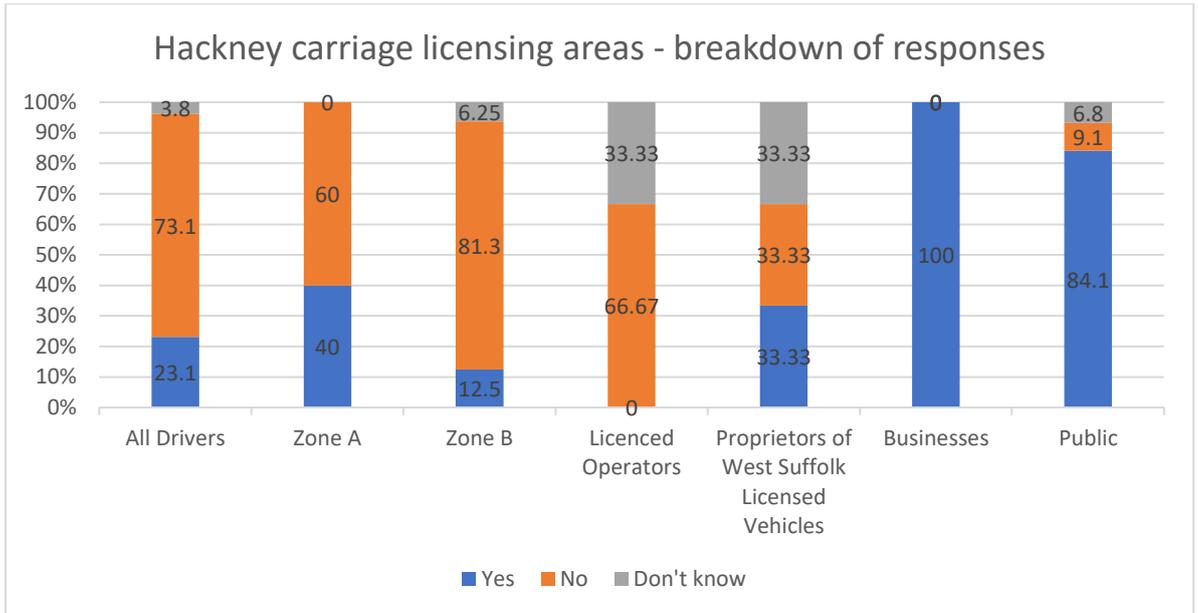
The graph indicates that most respondents agree with proposal 1 – with 57.1 per cent agreeing and 35.2 per cent disagreeing. 7.7 per cent answered 'don't know'.

16. Eight (100 per cent) respondents representing businesses and 37 (84.1 per cent) members of the public were in favour of this proposal. These figures were reinforced with 17 respondents providing a free text reason for their answer; 11 comments indicated that respondents felt this proposal represented a 'common sense' initiative for West Suffolk.

Comments – Yes	Frequency of inclusion
Common sense proposal	11
Uniform approach across district or increase efficiency	4
Reduced emissions	2
Opens up the market	1
Will improve number of taxis to a more adequate level	1
Good for the area	1
Wheelchair users should be allowed options	1
Want in place by end of 2020	1
Support for livery for safety reasons	1

17. Conversely, 73.1 per cent of all drivers (Zones A and B) who responded online were opposed to the proposal. 66.7 per cent of all respondents who were representatives of the taxi and private hire vehicle industry also opposed. 22 said that the provision of taxi and private hire cars in Bury and Newmarket was already either too high or adequate.

Comments – No	Frequency of inclusion
Too many taxis	13
Enough taxis	9
Not viable – less trade	4
Driver knowledge of new areas insufficient	2
Favours bigger companies	1
May lead to areas without taxi cover	1
Will cause disruption	
Will not reduce emissions	1
Don't want livery	1
Private hire vehicles shouldn't pick up without pre-booking	1



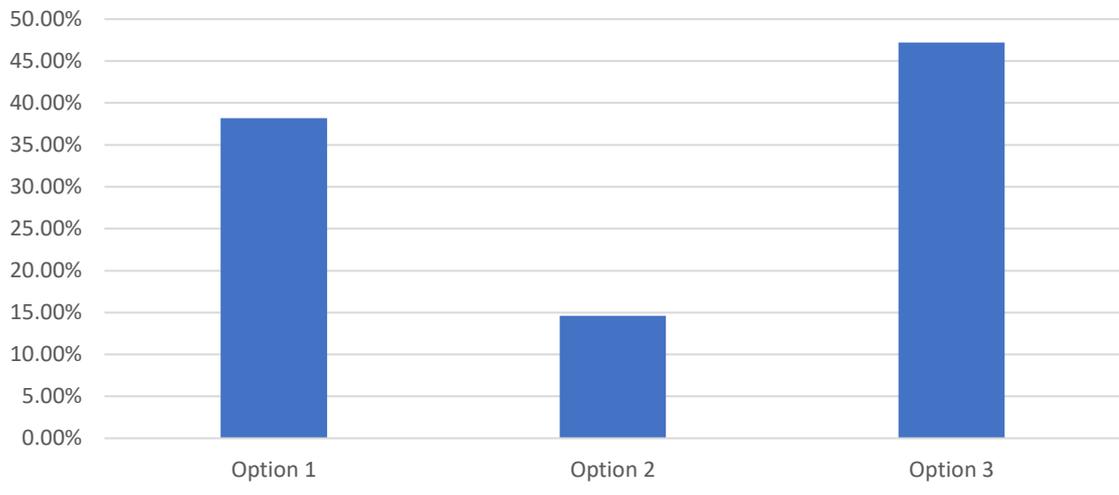
Graph illustrates a breakdown of responses as a proportion of each group of respondents. This shows that a high proportion of members of the taxi industry disagreed with the proposal, while very few members of the public disagreed with the proposal.

Section 2: Questions 6 to 8

Hackney carriage livery

18. Proposal 2a refers to a range of options for a potential future livery requirement for hackney carriages. This was listed in three options:
- Option 1 – a livery requirement of black vehicle plus yellow boot and bonnet wrap for all hackney carriages in West Suffolk
 - Option 2 – a livery requirement of black vehicle plus a coloured boot and bonnet wrap (other than yellow) for all hackney carriages in West Suffolk
 - Option 3 – no livery requirement.

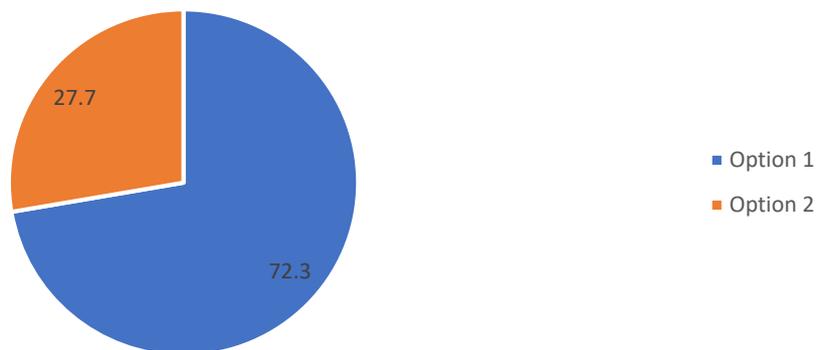
Please refer to proposal 2a of the summary of proposed changes document. Which is your preferred option? Please provide a reason for your answer (optional).



Graph shows that most respondents (47.2 per cent) favoured Option 3. The second most popular proposal was Option 1 at 38.2 per cent and Option 2 was selected by 14.6 per cent of respondents.

19. Of all 89 respondents, 52.8 per cent supported the use of a livery. 38.2 per cent preferred Option 1; 14.6 per cent Option 2. 63.8 per cent of respondents who supported the adoption of a livery were members of the public, with businesses the next largest group at 17 per cent. 72.3 per cent of respondents who supported a livery preferred Option 1.

Which is your preferred option? Respondents that support Livery.



The pie chart shows that, of the respondents who favoured a livery, the most popular option was Option 1 at 72.3 per cent, with Option 2 at 27.7 per cent.

20. 42 respondents preferred no livery requirement. 69.1 per cent of this number were representatives of the taxi and private hire industries. 31 per cent were members of the public.

Hackney carriage livery comments – support livery	Frequency of inclusion
Yellow is an easy colour to assist identification	5
Support livery – but a colour other than yellow is preferable	4
It will provide alignment across West Suffolk	3

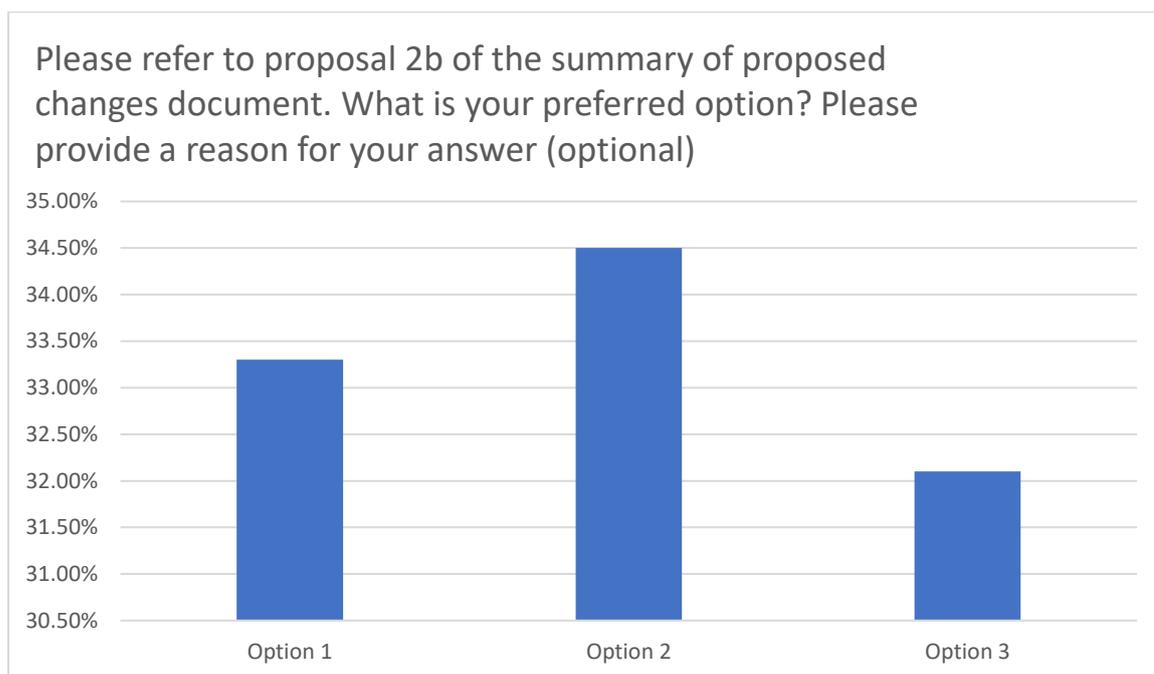
Hackney carriage livery comments – oppose livery	Frequency of inclusion
Expense for industry	19
Already have sufficient means of identification	13
Will impact on the individual identity of taxi firms	2
Aesthetics – will make the car ugly	1
Aesthetics – will make towns look tacky	1
Safety – passengers rely on colour rather than licensing	1

21. Respondents who chose Option 2 were asked to complete an additional free text question to indicate which livery colour scheme they would advocate. A total of 12 colours and colour combinations were put forward. The most popular individual colour was blue. Black with another colour (red, yellow and blue were suggested) was also popular.

Colours suggested	Frequency of inclusion
Blue	3
Black with another colour	3
Beige	2
Pink	1
Pink and purple	1
Black	1
Silver	1
Silver and blue	1
Green	1

22. Proposal 2b set out options for potential implementation of a possible new livery, as set out in proposal 2a. Three options were provided:

- Option 1 – The new livery is only required for new or replacement vehicles from the implementation date of the policy.
- Option 2 – The new livery becomes a requirement for all vehicles (including existing) from 1 January 2025.
- Option 3 – An alternative implementation timetable.



The graph indicates that respondents were quite evenly split of this proposal. Option 2 was the most popular at 34.5 per cent, 33.3 per cent of respondents preferred Option 1 and 32.1 per cent of respondents chose Option 3.

23. In total, 84 respondents answered this question and the response preferences were quite evenly split. 33.3 per cent of respondents preferred Option 1, 34.5 per cent for Option 2 and 32.1 per cent Option 3. A free text comment option was provided for respondents to offer a reason for their answers.

24. The reasons provided by respondents who selected Option 1 were that they either considered it to be the cheapest option or that a rush to implement in 2024 could be avoided through a staged approach to implementation.

25. For Option 2, three respondents said that they considered a five year timetable to be enough time to properly implement any potential changes. One respondent said that this would be the cheapest option. Another considered a clear set deadline would be best for passengers, citing safety as the key consideration for a quick implementation. Two respondents said

Taxi and Private Hire Vehicle
Policy

that they selected this option as they are due to leave or retire before 2025 and another indicated that their preferred option would be to avoid livery implementation.

Comment – Option 1	Frequency of inclusion
Cheapest option	2
Prevents a rush to deadline in 2024	1
Comment – Option 2	Frequency of inclusion
Five years is enough time	6
Will have left or retired by time of implementation	2
Cheapest option	1
Safety of passengers	1
Preferred option not to implement livery	2
Comment – Option 3 preferred timetable	Frequency of inclusion
Never or do not implement livery	13
Immediate implementation, or as soon as possible	3
2021	2
2022	2
2040	2
2027	1
2023	1
2050	1

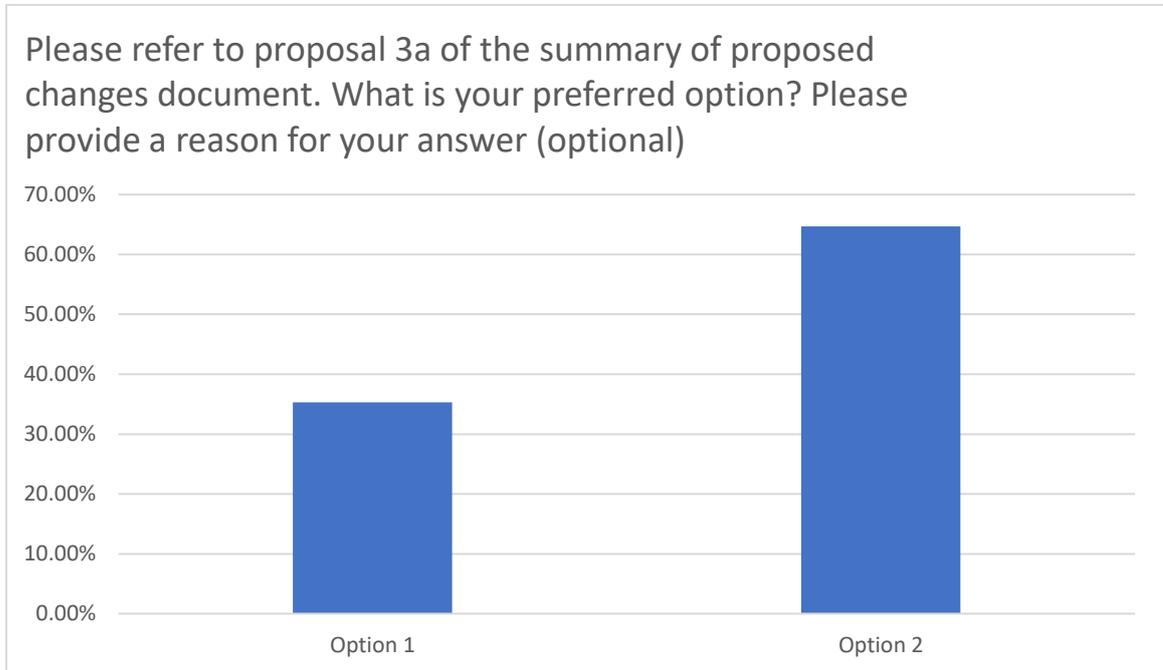
26. Respondents who selected Option 3 were invited to answer an additional free text question to state their preferred timetable. There were 20 comments provided in all, with the most frequent saying that a livery should not be implemented.
27. Please note: the answers provided by Option 3 respondents under comments and question 8 have been combined to avoid duplicate responses.

Section 3: Questions 9 to 11

Private hire livery

28. Proposal 3a refers to a potential future livery requirement for private hire vehicles. Two options were consulted on:

- Option 1 – a livery requirement of silver or white vehicles for private hire in West Suffolk (on the basis that white and silver finishes are the cheapest to purchase)
- Option 2 – no livery requirement.



The graph shows that Option 2 is the most popular at 64.7 per cent, compared to 47.3 per cent for Option 1.

29. Of 85 responses, 64.7 per cent of all respondents selected the option for there to be no livery requirement for private hire vehicles. 47.3 per cent were members of the public, a total of 50.9 per cent of respondents were members of the taxi and private hire industry.
30. The free text comments provide greater clarity around why respondents selected Option 2. Seven respondents cited that a livery was unnecessary as cars are pre-booked, with passengers provided with a description of the car for pick up. Seven respondents also stated that the cost of implementation was unnecessary or prohibitive.

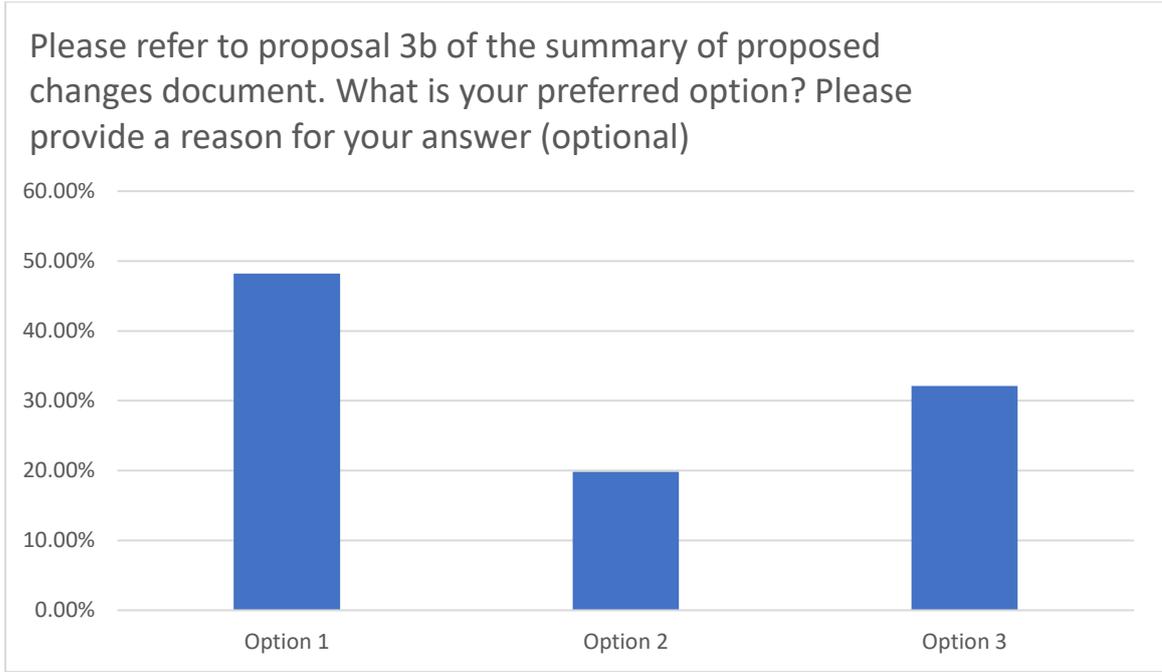
Comment – Option 2	Frequency of inclusion
Cars pre-booked with description provided	8
Cost of implementation	8
Cause confusion at popular venues	3
No livery required	4
Current identification sufficient – stickers and licences	5

Will not adhere to livery even if implemented by council	2
Colours suggested by council will not aid identification	1
Identity of companies will be affected	1

31. 46.7 per cent of respondents who selected Option 1 were members of the public, 23.3 per cent identified as representatives of business and 30 per cent represented the taxi and private hire vehicle industry. The most frequently cited reason for support of Option 1 is that a livery will make private hire vehicles easier to identify and distinguishable from hackney carriages.

Comment – Option 1	Frequency of inclusion
Will make it easier to identify or distinguish between hackney and private hire	4
Good idea or common sense proposal	2
Better regulation of the industry	1
Help traffic management staff distinguish between hackney and private hire vehicle	1
More environmentally friendly	1
Will look nice	2

32. Proposal 3b set out options for potential implementation of a possible new livery, as set out in proposal 3a. Three options were provided:
- Option 1 – the new livery is only required for new or replacement vehicles from the implementation date of the policy
 - Option 2 – the new livery becomes a requirement for all vehicles (including existing) from 1 January 2025.
 - Option 3 – an alternative implementation timetable.



The graph shows that respondents preferred Option 1 at 48.2 per cent, 32.1 per cent favoured Option 3 and 19.8 per cent Option 2.

- 33. In total, 81 respondents answered this question. 48.2 per cent of respondents preferred Option 1, 19.8 per cent Option 2 and 32.1 per cent Option 3. A free text comment option was provided for respondents to offer a reason for their answers.
- 34. Only nine respondents who selected Option 1 or 2 provided a comment.

Comment – Option 1	Frequency of inclusion
Cheapest option	2
Phased approach preferable	1
Easier to phase in with livery	1
Comment – Option 2	Frequency of inclusion
Allows time to implement	3
Represents earliest fixed date	1
Will be retired by 2025	1
Safety of the public is the key issue	1

- 35. Respondents who selected Option 3 were invited to answer an additional open text question to state their preferred timetable. There were 19 comments provided, with the most frequent saying that a livery should not be implemented.

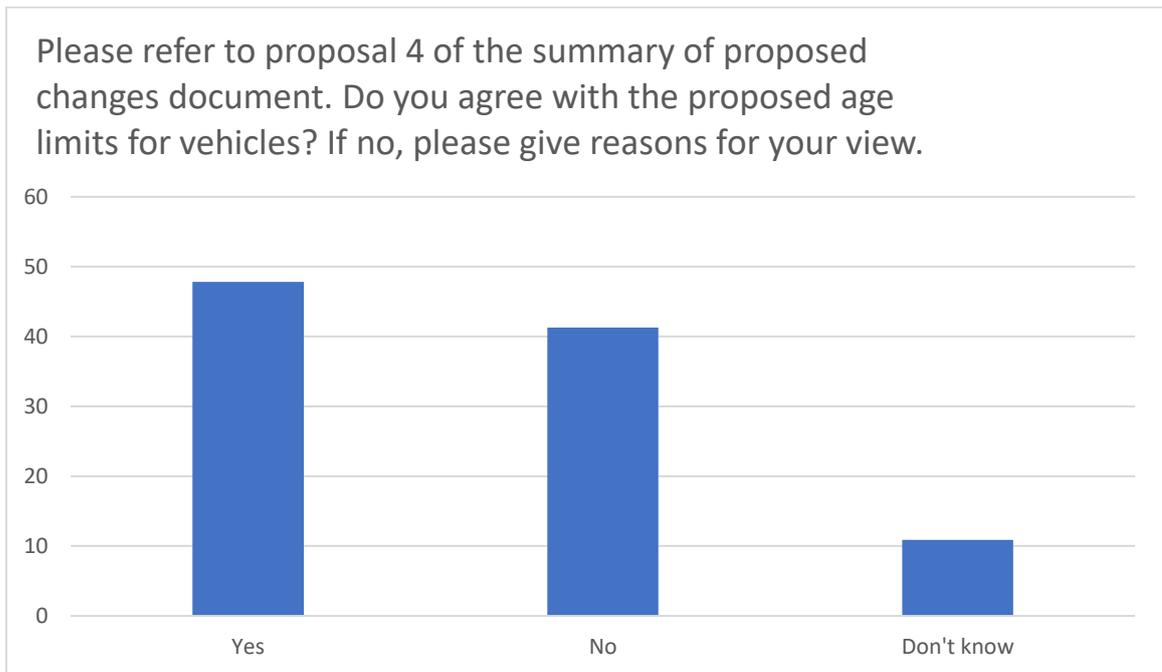
36. Please note: the answers provided by Option 3 respondents under comment and question 8 have been combined to avoid duplicate responses.

Comment – Option 3 preferred timetable	Frequency of inclusion
No livery or expense unjustified	10
As soon as possible or 2021	3
Only for new vehicles	1
2022	1
2025	1
2040	1

Section 4: Questions 12 to 17

Proposal 4 – Question 12: Age of vehicle

37. Proposal 4 refers to the age of vehicle, with a proposed maximum age requirement of 10 years to all except electric or zero emission vehicles, as well as a maximum age of five years for saloon vehicles upon first registration. 47.8 per cent of 92 responses were in favour of this proposal, 41.3 per cent were opposed.



The graph shows that 47.8 per cent answered yes to proposal 4, 41.3 per cent answered no and 10.9 per cent answered don't know.

38. 68.2 per cent of those who selected 'Yes' in the online survey were members of the public, with 14.6 per cent representing businesses. These answers were accompanied by 11 additional comments that highlighted that lower emissions and environmental impact were a prime reason for agreeing with this proposal. One comment indicated that the longer length of ownership would make it easier for taxi and private hire drivers to convert to electric due to costs. Five comments stated that this proposal would keep standards high or vehicles safe. However, one commenter raised concerns that the upper age limit could negatively affect part time or older drivers.

Comment	Frequency of inclusion
Lower emissions or environmental impact	5
Keeping standards high or vehicle safety	5
Vehicles should be three years old	1
Personal choice	1
Reservations about impact on part time and older drivers	1

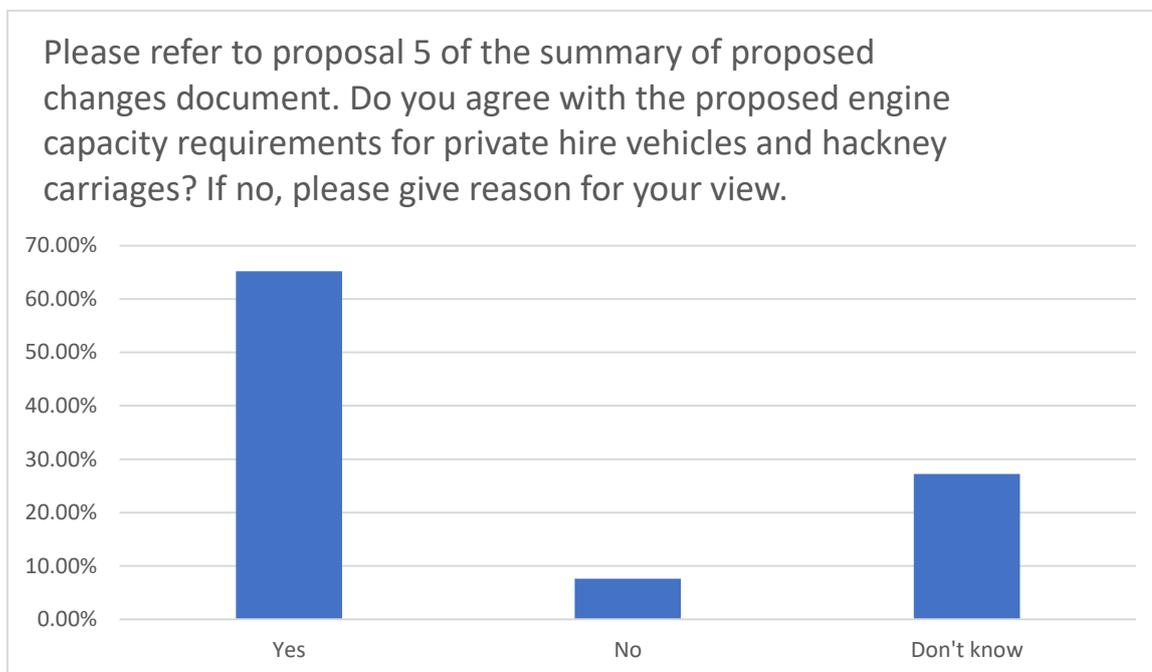
39. Most respondents who selected 'No' to proposal 4 were members of the taxi and private hire industry, 76.3 percent of respondents were industry representatives, 21 per cent were members of the public and 2.6 per cent were business representatives.

40. Thirty three of the 38 respondents who answered 'No' to proposal 4 provided an additional comment. Fifteen commented that vehicle standards, through MOT and council tests, as well as the required Euro 6 emission standard, were sufficient to guarantee quality and lower emissions. Six highlighted the cost to the industry, with one respondent suggesting that it could force drivers to buy cheap rather than quality vehicles and two other respondents highlighted the impact on saloon drivers. Other comments cited that such limits should apply to low emission vehicles as well, due to the need for regular maintenance, that environmental impact of converting to lower emission vehicles would be negated by the impact of scrapping the current fleet and that the focus should not be on the age of the vehicle, but the CO2 emissions of the vehicle as a way of lowering carbon impact.

Comment	Frequency of inclusion
Vehicle standards (MOT, council tests, Euro 6) are sufficient	15
Cost to industry	6
Age limit should be set at 15 years maximum	3
Lower emissions negated by impact of scrapping serviceable vehicles	2
Similar age limits should apply to electric or low emission	2
Focus should be on CO2 and wheelchair accessibility	2
Many cars over 10 years old	1
Age limit should be 12 years maximum	1
Negative impact on part time drivers	1
Electric or lower carbon vehicles not good enough	2
Many coaches or buses over 10 years old	1
Customers don't care about car age	1

Proposal 5 – Question 13: Engine capacity requirements

41. Proposal 5 referred to proposed new engine capacity requirements for private hire and hackney carriages and consultees were asked whether they agreed with this potential change. Of the 92 responses to this question, 65.2 per cent agreed with the proposal, 7.6 per cent disagreed and 27.2 per cent did not know.



The graph shows a majority in favour of proposal 5, with 65.2 per cent answering yes, 7.6 per cent responding no and 27.2 per cent answering don't know.

42. Respondents were asked to provide free text comments to explain their answer. Of the 54 respondents who agreed with the proposal, five respondents explained that they agreed with this proposal as it was a sensible approach, while two cited a decrease in emissions.

Comment – Yes	Frequency of inclusion
Sensible approach	5
Decrease emissions	2
Failure to scrap minimal will lead to taxi shortages	1
Engines getting smaller and more efficient	1
Potentially cost effective for the industry	1
Uttlesford council licensed a Smart car	1
Engine capacity no bearing on power output	1

43. Six of the seven respondents who answered no provided a comment. Two comments provided specific concerns. One respondent stated that the minimum engine requirement should be 1.8 to 2.2 engines. Another cited possible impact on independent drivers due to costs.

Comment – No	Frequency of inclusion
Informed previously that there is no requirement	1
1.8 to 2.2 engines should be the minimum	1
Change could affect independent drivers due to increased prices	1
Proposal imprecise	1
Engine capacity no bearing on power	1
Should be any size	1

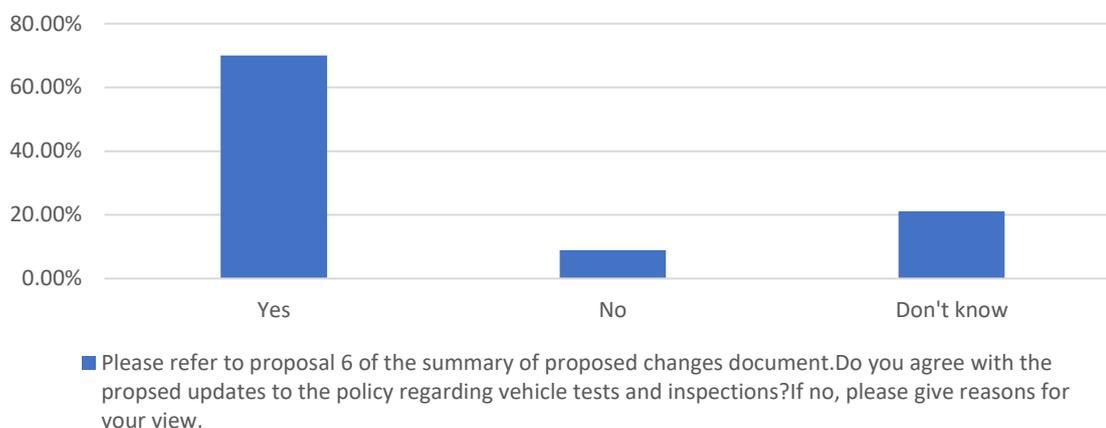
44. Four comments were also provided by respondents who indicated they didn't know. The most frequent comment was that they had insufficient information or knowledge to answer. However, there was also one comment that, despite a lack of knowledge regarding this question, the most important factors should be low emissions and vehicle safety. One respondent stated that electric vehicles were too expensive and that this does not incentivise uptake by drivers.

Comment – 'Don't know'	Frequency of inclusion
Insufficient information or knowledge	3
Emissions should be low and vehicles safe	1
Electric vehicles too expensive	1

Proposal 6 – Question 14: Test and inspection

45. Proposal 6 referred to new test and inspection requirements for private hire and hackney carriages and consultees were asked whether they agreed with this potential change. Of the 90 responses to this question, 70 per cent agreed with the proposal, 8.9 per cent disagreed and 21.1 per cent did not know.

Please refer to proposal 6 of the summary of proposed changes document. Do you agree with the proposed updates to the policy regarding vehicle tests and inspections? If no, please give reasons for your view.



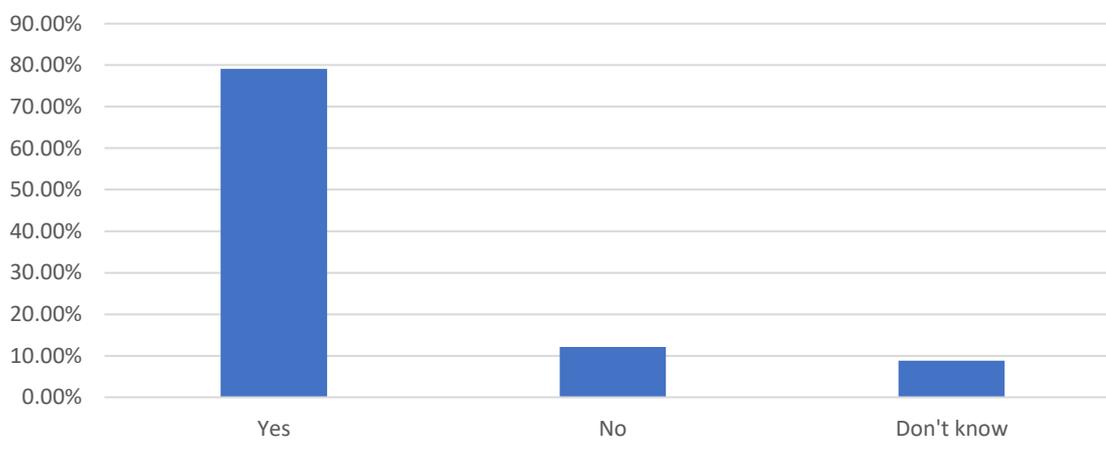
The graph shows a majority answered yes to proposal 6 (70 per cent), 8.9 per cent answered no and 21.1 per cent answered don't know.

46. Respondents were asked to provide free text comments to explain their answer. In total, 13 comments were made for all answers. For respondents who answered yes, two comments indicated that they believed this to be a sensible proposal. Two other respondents cited vehicle safety and that vehicle reliability and standards should be consistent.
47. Two respondents who answered no argued that the proposal was not clear. One respondent cited financial constraints. Another respondent stated a preference to use a station and tradesmen who were known to the respondent, rather than a council mandated station. In a similar vein, another respondent stated a preference for existing systems.
48. Three respondents who selected don't know suggested that they either held insufficient knowledge to answer or that the proposal was incoherent. One such respondent queried if the proposal suggested undertaking MOT and licensing at the same time. One respondent suggested that the proposal was too lax and the policy should aim to ensure the highest possible standards.

Proposal 7 – Question 15: Convictions

49. Proposal 7 referred to a new convictions policy that increased the length of ban for violent and racially aggravated crimes, as well as sex offenses. Of 91 total responses, 79.1 per cent agreed with this proposal, 12.1 per cent disagreed and 8.8 per cent didn't know.

Please refer to proposal 7 of the summary of proposed changes document. Do you agree with the proposed updates to the convictions policy? If no, please give reasons for your view.



The graph shows a majority in favour of proposal 7 with 79.1 per cent answering yes, 12.1 per cent answering no and 8.8 per cent answering don't know.

50. The comments provided for respondents who answered both yes and no follow some similar themes. While there is broad agreement with the spirit of the proposal, all eight comments left by respondents who answered no stated that they disagreed with the proposal because the bans imposed should either be longer or permanent. Similarly, most respondents who answered yes to the proposal also favoured a longer or permanent ban. However, three respondents agreed with the length of ban as set out in the proposal.

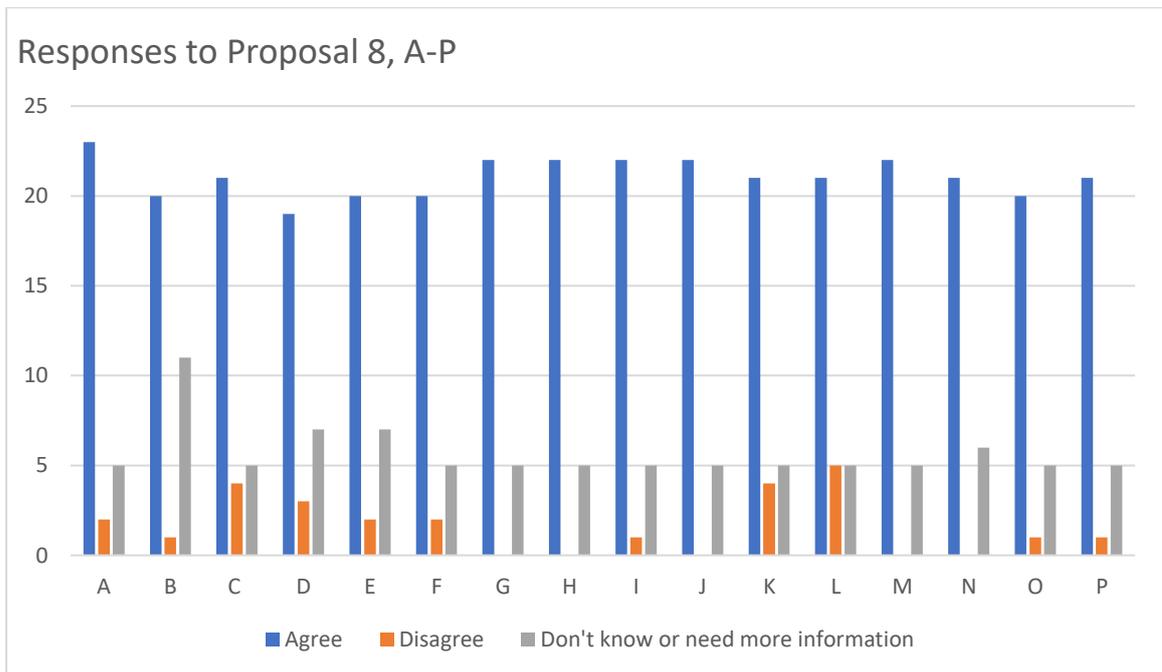
Comments – Yes and No answers	Frequency of inclusion
Should mean permanent ban	13
Agree with policy as proposed	4
Should mean longer ban	3
Dependent upon circumstances of the crime	3

51. Three respondents who answered don't know provided a comment. Two indicated that they had insufficient knowledge to answer, with one stating that, if there was evidence that the current ban length was insufficient, they should be increased as per the proposal.

Comments – Don't know answers	Frequency of inclusion
Insufficient knowledge	2
No comment	1

Proposal 8 – Question 16: Other minor proposals

52. Proposal 8 refers to a series of other minor proposals, designated A to P. Respondents were asked to comment on the proposals as presented. Forty-eight respondents provided comment. Analysis of the comments shows that there is broad agreement for all proposals.



The graph highlights the collection of responses to 16 additional minor proposals. The majority agree with all proposals, with some increased opposition to proposals L, K and C.

53. The proposal that respondents disagreed with most consistently was proposal L, which is a requirement for clear windows. Four respondents disagreed because many new cars come with tinted windows, so there would be a cost involved in making changes. One respondent also indicated that tinted windows prevent larger vehicles from overheating, so provide comfort and safety for driver and passenger. Conversely, two respondents argue that the proposal is irrelevant because Driver and Vehicle Standards Agency (DVSA) regulations are sufficient and enforced.

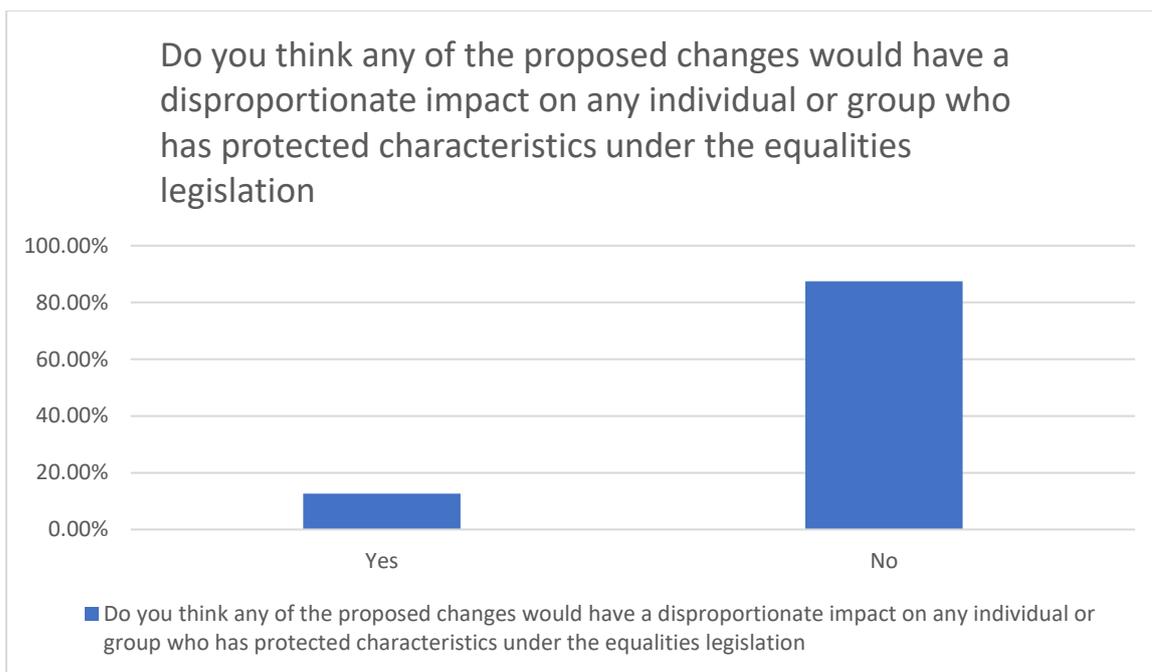
Comments – Proposal L	Frequency of inclusion
New cars come with tinted windows	4
DVSA regulations are sufficient	2
Safety issue for larger vehicles	1

54. Proposal B, a new requirement for licensed drivers to undertake a refresher Safeguarding, Child Sexual Exploitation and Disability Awareness course, incurred the most calls for more information. Most frequently, respondents asked questions about finance. Three respondents specifically asked if West Suffolk Council would finance this proposal, with another asking how much the course would potentially cost drivers.

Comments – Proposal B	Frequency of inclusion
Council paying for it?	3
How much would it cost?	1
Requires consultation with drivers	1
More information required	1
Included in two-day course	1

Equalities impact – Question 17

55. Respondents were asked an additional question around equalities impact. 88.5 per cent of respondents answered that that they did not think the proposals set out by the council disproportionately affected any individual or group. Ten free text comments were added by respondents.



The graph shows that 12.6 per cent of respondents think there is a disproportionate impact on individuals or groups with protected characteristics. 87.4 per cent answered no.

56. Responses to this question can be divided between issues that can be considered under the equalities act and other issues. Seven comments explained why respondents considered the proposals discriminatory. Two comments cited age discrimination, but did not explain which age group; one respondent considered workers resident in the UK for less than three years to be discriminated against due to increased cost requirements; one respondent considered the proposals discriminatory to people with disabilities, as the proposals will lead to drivers getting cheaper cars to cut costs; one respondent considered the proposals to discriminate against small firms and owner drivers and another indicated that proposal 7 needed to be reworded.

Comments – equalities legislation	Frequency of inclusion
Age discrimination (unspecified)	2
No discrimination	2
Disabled passengers	1
Gender – some more awareness regarding male and female drivers doing the same job	1

Comments – Other issues raised	Frequency of inclusion
Migrants or EU workers – resident under three years	1

Offenders – all offenses should be judged in context	1
Small or self-owned companies	1
Proposal 7 – wording issues	1

Appendix C: CAB.WS.20.056 Additional Proposal 4 (Age of Vehicle Implementation) Survey Summary

Background

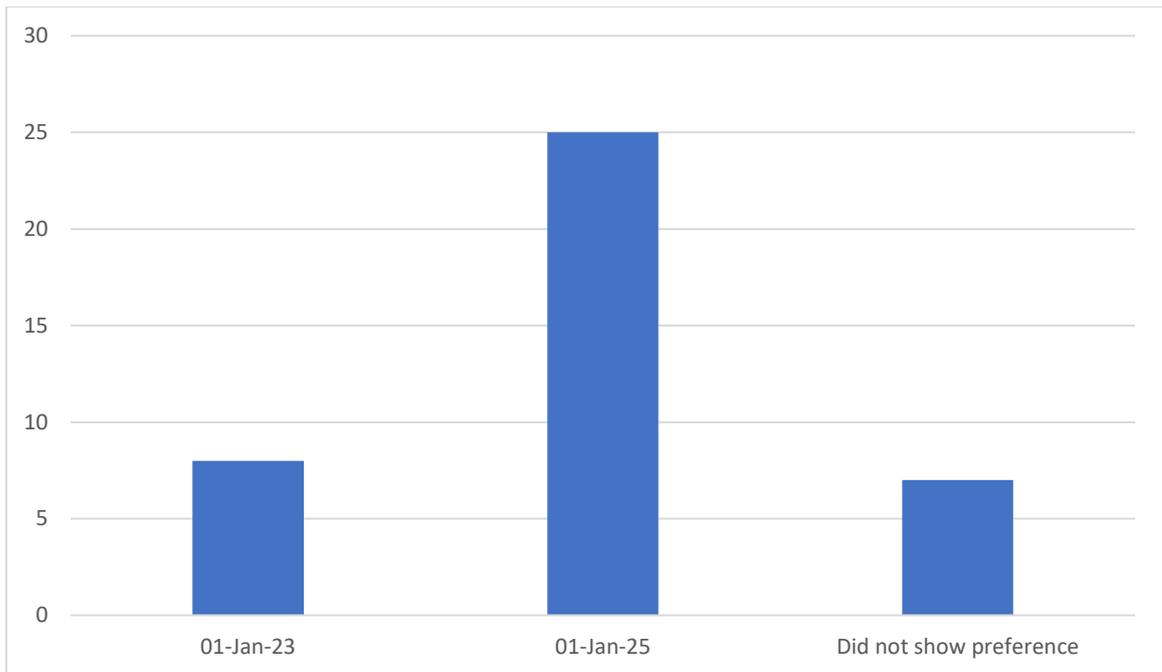
1. Public consultation took place between 27 January and 9 March 2020 on the proposed changes to the West Suffolk Council Hackney Carriage and Private Hire Conditions Policy Handbook.
2. Proposal 4 refers to the age of vehicle, with a proposed maximum age requirement of 10 years to all except electric – zero emission vehicles, as well as a maximum age of five years for saloon vehicles upon first registration. In the initial consultation, 47.8 per cent of 92 responses were in favour of this proposal, 41.3 per cent were opposed.
3. From 1 June and 15 June 2020, an additional informal survey was carried out directly with members of the industry to gather feedback on implementation options for proposed changes to the maximum age of vehicle.

Methodology

4. The West Suffolk Council licensing team is in possession of email addresses for 98 per cent of all hackney carriage and private hire drivers in the district. In addition, the team has fostered active and responsive communications via email with West Suffolk drivers.
5. As such, it was possible to engage directly and quickly with members of the industry for this informal survey.

Responses

6. The survey set out two options for dates to implement the proposal from renewal: 1 January 2023 and 1 January 2025. Members of the industry were asked to rank these dates in order of preference (1 to 2).
7. Of the 672 drivers contacted, 40 responded to the survey. 25 responders (62.5 per cent) favoured renewal from 1 January 2025.



Graph highlights the majority of respondents (25) favoured implementation from 1 January 2025. Eight respondents favoured implementation from 1 January 2023, seven respondents did not show any preference.

- These results were reinforced by nine free text responses, five of which emphasised the impact that COVID-19 has had on the industry and the need for hackney carriage and private hire companies to recover. Other comments also focused on the cost to companies and that self-employed drivers may struggle with the earlier implementation.

Comments – 2025	Frequency of inclusion
<i>Need more time after COVID-19</i>	6
<i>Condition of the vehicle more important than age</i>	5
<i>Cost to industry</i>	2
<i>Self-employed would struggle</i>	1
<i>Questioned consultation process</i>	1

- Conversely, eight responders opted for an earlier implementation date of 1 January 2023. There was only one free text comment, which stated general support for the age of vehicle proposal.
- In addition, seven responders did not state a preference and each provided a comment to elaborate further. Of the seven free text responses, three stated general opposition to the implementation of a maximum age of vehicle proposal, one suggested an alternative approach through vehicle tests every three months and one stated that more time was required.

<i>Comments – did not show preference</i>	Frequency of inclusion
<i>No to maximum age requirement</i>	3
<i>Alternative approach – tests every three months</i>	1
<i>More time required</i>	1

Appendix D: CAB.WS.20.056

Reasons to defer amalgamated zone decision

Based on the consultation feedback received from the industry and evidence from the unmet demand survey, it is recommended at this time to retain the two-zone system – with the caveat that the position be reviewed, and any further changes can be implemented within two years.

This would allow a programme of further engagement with the industry and more evidence gathering to inform the decision and ensure that it has greater support among industry members.

Possible risks

A hackney carriage vehicle can only accept fares within its registered zone of operation. For this reason, at present in West Suffolk, zone B taxis (former St Edmundsbury Borough Council (SEBC) area) cannot operate on a taxi rank or be hailed on the street in the zone A (former Forest Heath District Council (FHDC)) area and vice versa (although this does not prohibit transporting passengers to locations in the different zones or the operation of private hire vehicles taking pre-booked passengers).

Taxi zoning is a means of managing supply and demand. If the council maintains the current boundaries that restrict the operating area (for example, for up to a further two years) of a hackney carriage to the zone it is licensed for, it guarantees the supply of service in the area it is assigned to. In other words, there is no risk to maintaining the two-zone system for passengers or trade.

There is no common body of research that summarises how keeping or removing zoning has benefitted the consumer or otherwise. However, the main negative risk of amalgamating zones - of vehicles being attracted to a main centre or more lucrative area leaving demand unmet in other areas – can be detrimental to the local area (see Durham case study below). In addition, there is also a risk of over queuing at taxi ranks, which causes problems navigating the road for other drivers, cyclists and buses and causes additional emissions through idling.

This means that there is risk involved with a proposal to merge zones, but not a great deal of comparative or indicative data that can be gathered to support a merge.

Any decision to move to one zone could leave the council unable to regulate any issues with supply and demand. Firstly, there is no legal way of regularising the supply of hackney carriage vehicles in different areas to ensure that there is no unmet demand without maintaining different zones – our only option in this instance would be to license more vehicles if they choose to apply.

And secondly, local authorities do not have legal power to create new taxi zones. While it is worth noting that, if the decision were made to merge zones, the implementation would not be instant (and instead be implemented on a similar

timeframe to other proposals, such as the maximum age of vehicle), any decision to merge, once made, cannot be changed back without a change to legislation. (It should also be noted that the Law Commission recommended giving local authorities the ability to create new zones to prevent unmet demand through honey-potting.)

Unmet demand survey – notable findings

The West Suffolk unmet demand survey was published in January 2020. The study found that there was a potential negative impact in the area if the two taxi zones were merged.

(Please note: the definition of unmet demand is: 'any length of time waiting'.)

Among other findings, the study suggested the distances between the four settlements (zone A – Newmarket and Mildenhall; zone B – Bury St Edmunds and Haverhill), which reduces the likelihood of major moves between the two zones, also dissuades drivers from taking fares cross zone, as this will necessarily entail their need to return empty. Were the zones amalgamated, this would no longer be the case.

Were the zones to be merged, it will inevitably cause issues with local supply. For example, if a taxi takes a passenger from Bury St Edmunds (current zone B) to Newmarket (zone A), there is no guarantee they can find a new passenger to take back to Bury St Edmunds, causing a shortfall in supply in zone B – that is, they may remain in the current zone A longer.

What is more, there is also a risk of 'honey-potting'. The study recognises that there may be times, such as race days in Newmarket or market days in Bury St Edmunds, where vehicles may flood to a single specific area where business may be more lucrative, leaving gaps in the supply elsewhere (unmet demand).

While the impact is unknown, the study acknowledges that there is some risk of unmet demand arising should the zones be merged. However, it should also be noted that the purpose of the unmet demand survey was not to ascertain the risk of amalgamating the two zones, but to gauge the relative health of the local service in its current form. As such, the use of this study as an evidence base for merging the zones is not robust and there remains a degree of uncertainty. There remains a need to undertake a further review, in order to acquire sufficient evidence.

Merging the zones – industry response in the unmet demand survey

Compared to the driver interviews carried out in the unmet demand survey, the opposition to merging the zones from the industry represents a shift in opinion. As shown in the unmet demand Survey, 51 per cent of drivers interviewed were opposed to merging the zones and 47 per cent were in favour (page 55, West Suffolk Unmet Demand Survey).

The discrepancy between the consultation response and the unmet demand survey interviews highlights the need to engage further with the industry on this issue.

Impact of COVID-19

The evidence from the unmet demand survey suggests the two zones are currently working. However, the impact of COVID-19 on the industry is, as yet, unknown.

Due to COVID-19, West Suffolk presently has 94 vehicles with active Statutory Off Road Notifications (SORNs) – 21 of these are hackney carriage vehicles – this represents 10 per cent of the total fleet in West Suffolk. There remains a great deal of uncertainty and disruption to the industry as the COVID-19 pandemic continues to unfold.

In this context, the work to manage a move to a single zone system at this point may be significant and will cause further disruption to a local supply system that is working.

Approaches taken by other authorities – case studies

Durham County Council

Prior to 1 April 2009, when the County of Durham was divided into seven district council areas, hackney carriages were licensed by the seven district councils. Each district had its own taxi policy which related to matters such as vehicle, driver and operator licence conditions, fees and charges and taxi fares and so on. When the single Durham Council was formed, it sought to amalgamate the taxi zones in a similar fashion.

Transitional arrangements were put in place where there would initially be differing licence conditions applying across the seven zones to give the industry time to adapt to the various changes resulting from the new policy and associated conditions. In this manner, the process afforded some means of protection to those who were involved in the taxi trade, while ensuring that the transition to the standard adopted by the licensing authority was managed in an orderly fashion for the benefit of the public. The Durham Council 'taxi policy' was formally adopted in May 2011.

However, a review of the policy took place in summer 2015, which included a 12-week public consultation between June and August 2015. This indicated serious problems had come about due to the amalgamation of the taxi zones.

(It should also be noted that the consultation did not have any questions on honey-potting, unmet demand or other issues arising due to the amalgamation of the taxi zones. All comments were included under 'other comments'.)

The most comments (11.4 per cent) focused on there being too many taxis in Durham centre, while other comments (4.1 per cent) highlighted that non-local taxis were causing issues.

Public responses indicated that Durham city had become “a honey-pot for taxis from far and wide. Residents suffer from long queues of taxis (over ranking)... There is a further problem, in that drivers from out of town are not familiar with the area and do not know where the passenger has asked to be taken to. If the passenger is also from out of town, they may not know the postcode, which reduces the value of satnavs.”

East Suffolk Council

East Suffolk Council was created from the former Waveney and Suffolk Coastal Councils at a similar time to West Suffolk Council’s formation. Similarly, much of their early work as a council has involved the harmonisation of policies between its two former entities into workable single policies.

However, regarding taxi policy, in contrast to West Suffolk Council, East Suffolk Council has been taking an incremental approach – which has allowed all partners, including the industry, to adjust gradually to any changes. In June 2020, the council introduced a new drug testing standard into its taxi policy and is due to consider fare harmonisation across the area next. However, as the two-zone system inherited from the two former councils works, it has not yet been considered for amalgamation. While it is likely to be considered in the future, there is as yet no timeline set out.

Approach for zone amalgamation

Complete Transport Solutions (CTS), the organisation that undertook the West Suffolk Unmet Demand survey, and West Suffolk Council officers have set out an approach to a review for the consideration of merging into a single zone within two years should the proposal be agreed.

Proposed timeline for further zone review

- Spring 2021 – undertake engagement events and evidence gathering with the taxi industry. Produce a clear short report summarising views and making an independent and reasoned recommendation for the way forward with regard to zoning by March 2021.
- Summer 2021 – officers review recommendations and evidence base.
- Approximately September 2021 – Cabinet receive recommendations and any implementation plan.
- By April 2022 – adopt any changes to zoning.

Appendix E: West Suffolk Unmet Demand Survey 2019



LVSA West Suffolk
Final Demand Surve



LVSA West Suffolk
Appendix 4 Overall :



LVSA West Suffolk
Appendix 5 Detailed



LVSA West Suffolk
Appendix 6 On Stree

Appendix F: Complete Transport Solutions (CTS) questionnaires 2021

User survey

To all those in the West Suffolk Council licensing area who consider they need extra assistance or an adapted taxi to allow them to travel.

Who we are

Independent consultancy Licensed Vehicle Surveys and Assessments (LVSA) has been asked to carry out this engagement with you on behalf of West Suffolk Council's licensing service. A summary of the results will be provided to the council, but your personal details will not be included.

Background

After becoming a single council in 2019, West Suffolk Council carried out a survey to identify demand for hackney carriages across its full area, as well as to get more general information on how the overall hackney carriage and private hire trade served the area. Following completion and review of this survey, the council is now carrying out a review of the current supply and demand for wheelchair accessible vehicles (WAVs) and other adaptations or assistance that users may need across the hackney carriage and private hire fleets in the West Suffolk area.

Details of the current policy on WAVs in West Suffolk are available at this link [here](#):

Your views and experiences

We want to hear from as many of you as possible about your views and experiences of the taxi service (both hackney carriages and private hire vehicles) and the current WAV policies and customer needs. Your responses will help inform any recommendations on the future of the WAV policy in West Suffolk.

If you are unable to complete the survey by yourself, you are welcome to ask someone else to complete it on your behalf and then state their relationship to you in the final question. We are keen to hear from parents and carers of children and young people with additional needs.

A person is considered disabled under the Equality Act 2010 if they have a physical or mental impairment that has a substantial and long-term negative effect on their ability to undertake normal daily activities, including using taxis. However, we also want to hear from people who do not fit this definition, but

nevertheless face physical challenges when accessing taxi transport that mean they require extra assistance or adaptations.

You can complete this survey anonymously; however, our contact details are given at the end of the survey should you wish to discuss anything about the regulation of taxis in more detail. The survey should take around five to 10 minutes.

We are looking for as many completed questionnaire responses as possible to include in our report. There are a few different ways you can take part:

- online [here](#)
- in writing to either westsuffolkresponse@ctstraffic.co.uk or West Suffolk Council WAV Review 2021, CTS Traffic and Transportation, Unit 14 Aqueduct Mill, Aqueduct Street PRESTON PR1 7JN
- by telephone – please leave a message with the office on 01772 251400 giving your contact details.

Please feel free to add further information you believe to be relevant. To confirm, your responses will be summarised and included in our report and will not identify any individual. If you write or call on behalf of more than one person, please let us know how many people you are representing.

The consultation closing date is **5pm, Monday 4 October 2021.**

Thank you in advance for taking part.

Please answer all questions. If a question does not apply to you, please mark 'NA' (not applicable). Please provide information about any other items you consider relevant additionally.

Council:	West Suffolk	Please highlight or circle your responses
Section one – about you		
Q1. To help us understand better how our policies can improve the taxi service delivered to you, please identify your condition, disability or disabilities. You can select as many responses as apply to you.	Mobility	
	Hearing	
	Vision	
	Learning	
	Mental health	
	Communication	
	Long-standing health condition	
Q2. Does your disability or mobility issue require you to use any of the following? (Please select all that apply)	Other	
	An assistance dog	
	A wheelchair all of the time	
	A wheelchair some or most of the time	
	Hearing aids	
	Sight aids	
	Walking sticks or crutches	
Q3. When you travel by taxi, which of these statements best describe what you would need? You can select as many as apply to you.	A carer who is with you all of the time when you travel	
	I am in a wheelchair and the vehicle would need to be a purpose-built wheelchair accessible vehicle (WAV)	
	I am in a wheelchair but would not require a purpose-built WAV	
	I would require the driver to assist me to transfer from my wheelchair into a passenger seat and for the driver to store my wheelchair safely in the vehicle	
	I would require the driver to assist me walking to the vehicle and getting in	
	I find it hard or impossible to step up into larger wheelchair accessible vehicles and so need a saloon-style vehicle	
	I would require the operator to provide me with a vehicle and driver that can carry me and my assistance dog	
	I would require a text message to let me know my vehicle had arrived (for private hire vehicles)	
	I would require the driver to knock on my door or call me once the vehicle had arrived (for private hire vehicles)	
	I would require the driver or operator to communicate with another person – such as	

	a carer, family member or friend to confirm I have been collected and again when I have been dropped off.	
	I would require the vehicle to arrive exactly on time and not be late (for private hire vehicles)	
	Other measures (please state)	
Section two – hackney carriages		
In this section, we want to know about your experience of using hackney carriages. These are taxis that can park on a rank in a town centre and be hailed as they are driving along. (Section three relates to pre-bookable minicabs or private hire vehicles.)		
Q4. Which of the following best describes you with respect to your use of hackney carriages (taxis)?	A regular user	1
	An occasional user	2
	I rarely use hackney carriages	3
Q5. How do hackney carriage drivers meet your current needs? Please identify which if any of the following statements you agree with.	Taxi drivers do enough to enable me to travel	
	Taxi drivers usually go above and beyond to assist me when travelling	
	Taxi drivers don't take any reasonable steps to assist me when travelling	
	Taxi drivers do not seem to understand my disability or travel needs	
	Any other comments	
Q6. What is your view on the balance between the availability for WAV hackney carriages in West Suffolk and the demand for them?	There are too few WAVs to meet demand	1
	There are just about the right number of WAVs to meet demand	2
	There are more than enough WAVs to meet demand	3
	I don't know	4
Q7. If you are unable to find a suitable hackney carriage when you need one, what do you do? (Please tick all that apply)	Call a private hire operator	
	Wait until a suitable vehicle is available	
	Call a friend or family member to ask for a lift	
	Use other public transport	
	Get to my destination under my own steam (walking or using wheelchair)	
	Use a less suitable vehicle for which I require more assistance	
	Other (please state)	

Section three – private hire vehicles

In this section, we want to know about your experience of using private hire vehicles. These are booked in advance, through an operator.

Q8. Which of the following best describes you with respect to your use of private hire vehicles (minicabs)?	A regular user	1
	An occasional user	2
	I rarely use private hire vehicles	3
Q9. How do private hire taxi drivers meet your current needs? Please identify which, if any, of the following statements you agree with.	Taxi drivers do enough to enable me to travel	1
	Taxi drivers usually go above and beyond to assist me when travelling	2
	Taxi drivers don't take any reasonable steps to assist me when travelling	3
	Taxi drivers do not seem to understand my disability or travel needs	4
	Any other comments	
Q10. What is your view on the balance between the availability for WAV private hire vehicles in West Suffolk and the demand for them?	There are too few WAVs to meet demand	1
	There are just about the right number of WAVs to meet demand	2
	There are more than enough WAVs to meet demand	3
	I don't know	4
Q11. The ability to book private hire vehicles through an operator is an integral part of local transport provision. We are interested to know if operators are currently meeting your needs. Please select as many of the following statements that represent your views.	I do not tell operators that I have a disability as I worry that they will discriminate against me	
	I find that private hire operators are never, or rarely, able to provide a vehicle suitable for me	
	If I tell operators about my needs, they are usually happy to find me appropriate transport	
	The service I receive from private hire operators is good	
	Usually, operators tell me they do not have a suitable vehicle available	
	If I book sufficiently in advance, operators will usually meet my needs (please tell us how far in advance)	
	I am usually unable to get a private hire vehicle if needed instantly	
	I do not believe that private hire operators make reasonable adjustments to help me travel	
	Don't attend my activity or appointment	

Q12. If you are unable to book a suitable private hire vehicle when you need one, what do you do? (Please tick all that apply)	Wait until a suitable vehicle is available	
	Call a friend or family member to ask for a lift	
	Use other public transport	
	Get to my destination under my own steam (walking or using wheelchair)	
	Use a less suitable vehicle for which I require more assistance	
	Use community transport	
	Other (please state)	
Section four – your overall experience		
Q13. Do any of the following statements apply to you?	I booked a vehicle through an operator but when the vehicle arrived the driver did not take me	
	I have been refused transport by an operator or driver for reasons related to my disability	
	A taxi driver refused to take me as I had an assistance dog	
	A taxi driver refused to take me because I am in a wheelchair	
	A taxi driver refused to take me because of some other aspect of my disability, not a dog or wheelchair	
	I was charged extra because of my disability	
	I have been made to feel uncomfortable by a taxi driver due to my disability	
	Any other comment	
Q14. Do you agree with the current policy that all new and replacement hackney carriage vehicles should be wheelchair accessible?		
Q15. What changes do you think might improve the situation in West Suffolk for passengers with disabilities or other additional needs?	More wheelchair accessible vehicles	
	A wider variety of wheelchair accessible vehicles (for example, those that are not so high off the ground)	
	Disability awareness training for drivers	
	Disability awareness training for operators	
	Better use of smartphone apps	
	More council enforcement	
	Any driver or operator found to actively discriminate against disability to have their licences revoked	
	None of the above	
	Any other comments or suggestions	
Q16. Please sum up your experience of using taxis in West Suffolk.	Excellent	1
	Good	2
	Satisfactory	3
	Bad	4
	Dreadful	5

<p>Q17. Please tell us about any positive experiences you have had in using taxis in other places that you think could provide useful lessons for West Suffolk Council to learn from.</p>		
<p>Q18. The provision of taxis differs slightly across the West Suffolk district. In order to help us understand patterns by area, please tell us whether you live in the area formerly covered by Forest Heath District Council (Brandon, Lakenheath, Mildenhall, Newmarket, Red Lodge and surrounding areas) or St Edmundsbury Borough Council (Bury St Edmunds, Haverhill and surrounding areas). If you don't know this information, please tell us your postcode, minus the last two characters – for example, IP33 3</p>	<p>Former Forest Heath District Council area Former St Edmundsbury Borough Council area Postcode:</p>	
<p>Q19. If this survey has been filled in by someone else on your behalf, please state what their relationship is to you.</p>	<p>Carer Family member Support worker Other</p>	
<p>Please feel free to add any further questions or comments. Thank you for your response.</p>		
<p>This independent research complies with The Department for Transport Best Practice Guidance.</p>		

Trade Survey

To all those involved with the licensed vehicle (hackney carriage and private hire) trade in the West Suffolk Council licensing area.

Who we are

Independent consultancy, Licensed Vehicle Surveys and Assessments (LVSA) has been asked to carry out this engagement with you on behalf of West Suffolk Council's licensing service. A summary of the results will be provided to the council, but your personal details will not be included.

Background

After becoming a single council in 2019, West Suffolk Council carried out a survey to identify demand for hackney carriages across its full area, as well as to get more general information on how the overall hackney carriage and private hire trade served the area. Following completion and review of this survey, the council is now carrying out a review of supply and demand for wheelchair accessible vehicles (WAVs) across the trade to enable it to determine the future requirements for the licensing of new hackney carriage vehicles and also to consider how it can develop a more environmentally friendly fleet.

Your views and experiences

We want to hear from as many of you as possible about your views and experiences of the taxi service and the current WAV policies and customer needs. Your responses will help inform any recommendations on the future of the WAV policy in West Suffolk.

In responding to the questionnaire, please consider the full range of vehicles that are wheelchair accessible. Whereas some WAVs that are currently operating in West Suffolk are large vehicles, a range of options is available and should be borne in mind in the responses given.

We are looking for as many completed questionnaire responses as possible to include in our report. There are a few different ways you can take part:

- online [here](#)
- in writing to either traderesponse@ctstraffic.co.uk or West Suffolk Council WAV Review 2021, CTS Traffic and Transportation, Unit 14 Aqueduct Mill, Aqueduct Street PRESTON PR1 7JN
- by telephone – please leave a message with the office on 01772 251400 giving your contact details.

We are aware the questions often focus on hackney carriage vehicle operations. If any question is not appropriate to you, please ignore it. Please feel free to add further information you believe to be relevant.

Taxi and Private Hire Vehicle
Policy

To confirm, your responses will be summarised and included in our report and will not identify any individual. If you write or call on behalf of more than one driver, please let us know how many people you are representing.

The consultation closing date is **5pm, Monday 4 October 2021**.

Thank you in advance for taking part.

Please answer all questions. If a question does not apply to you, please mark 'NA' (not applicable). Please provide information about any other items you consider relevant.

Council:	West Suffolk	Please highlight or circle your responses
Your council taxi licence reference number (for validation):		
Q1. Which kind of vehicle do you drive?	Hackney carriage	1
	Private hire	2
	Both	3
Q2. If you drive a hackney carriage, which zone is it licensed for?	A or B	
Q3. Is your vehicle currently able to carry someone seated in their wheelchair?	Yes or No	
Q4. How often do you get a customer needing to travel in a wheelchair? Please tell us the frequency – for example, daily, once a month, once a year	From a rank	
	From a booking	
	From a contract	
Q5. If your vehicle is able to carry someone in their wheelchair, are you listed on the current West Suffolk Council wheelchair accessible vehicle list (available here)?	Yes or No	
Q6. If you are on this list, how often do you get customers contacting you who mention they have used the list?		
Q7. What is your view on the balance between the availability for WAVs in West Suffolk and the demand for them?	There are too few WAVs to meet demand	1
	There are just about the right number of WAVs to meet demand	2
	There are more than enough WAVs to meet demand	3
	I don't know	4
Q8. What is your view on the type of WAVs in operation in West Suffolk and their suitability to meet demand from wheelchair users, other customers with mobility impairments and able-bodied customers?		
Q9. Do you agree with the current policy (here) that all new and replacement hackney carriage vehicles should be wheelchair accessible?	Yes or No	
Q10. Please say why you gave that answer to Q9.		
Q11. How do you think West Suffolk Council should approach issuing licences for WAVs so that there is an appropriate number in operation? If you are		

aware of examples of good practice from other councils, please include them here, in particular any approaches councils have used to incentivise WAVs.	
Q12. Please write in any other comments or concerns about the WAV policy and provide any evidence you have for these concerns.	
Q13. West Suffolk Council is also keen to see a move to electric or hybrid hackney carriages. What challenges or barriers might be faced by drivers in moving towards a hybrid or electric fleet?	
Q14. Can you think of any support or incentives the council could use to overcome barriers and encourage take up of hybrid or electric hackney carriages?	
Please feel free to add any further questions or comments.	
Thank you for your response.	
This independent trade research complies with The Department for Transport Best Practice Guidance.	

Appendix G: Zone merging – case studies

Buckinghamshire Council

1. A recent example is Buckinghamshire Council which, prior to September 2021, operated five separate hackney carriage zones. Each zone had separate requirements in respect of vehicle specifications, fares payable and areas where they are permitted to stand and ply for hire. In addition, Aylesbury town held a limitation policy of 50 hackney carriage vehicles.
2. The formation of the new Buckinghamshire Council unitary authority by Government on 1 April 2020 provided an opportunity for a more joined up approach on taxi and private hire licensing across the Buckinghamshire Council area.
3. The new policy proposed, among other considerations, the removal of all existing hackney carriage zones, enabling hackney carriages to operate across the entire Buckinghamshire area.
4. The council undertook a significant amount of engagement, including a pre-engagement consultation with the taxi industry and a public consultation that received a total of 636 responses.
5. The breakdown of open responses and reasons for disagreement with the removal of the existing hackney carriage zones indicated that hackney carriage drivers and business owners were more likely to raise comments indicating disagreement and to reference local area expertise and that vehicles will flock to 'hot spots' as reasons for this. Of note is that these respondents did not raise concerns about rank capacity in their open comments to any higher degree than other respondent groups.
6. Despite this, the council took the decision to amalgamate the zones. While the new arrangements have not been in place long, there is no indication of a disrupted service.

Durham County Council

7. Prior to 1 April 2009, the now-unitary County of Durham was divided into seven district council areas and hackney carriages were licensed by the seven councils. Each authority had its own taxi policy which related to matters such as vehicle, driver and operator licence conditions, fees and charges and taxi fares and so on. When the single Durham Council was formed, it sought to amalgamate the taxi zones in a similar fashion.
8. Transitional arrangements were put in place where there would initially be differing licence conditions applying across the seven zones to give the industry time to adapt to the various changes resulting from the new policy and associated conditions. In this manner, the process afforded some means of protection to those who were involved in the taxi trade,

while ensuring that the transition to the standard adopted by the licensing authority was managed in an orderly fashion for the benefit of the public. The Durham Council 'taxi policy' was formally adopted in May 2011.

9. However, a review of the policy took place in summer 2015, including a 12-week public consultation between June and August 2015, which indicated serious problems had come about due to the amalgamation of the taxi zones.
10. (It should also be noted that the consultation did not have any questions on 'honey-potting', unmet demand or other issues arising due to the amalgamation of the taxi zones. All comments were included under 'other comments').
11. Most comments (11.4 per cent) focused on there being too many taxis in Durham centre, while other comments (4.1 per cent) highlighted that non-local taxis were causing issues.
12. Public responses indicated that Durham city had become "a honey-pot for taxis from far and wide. Residents suffer from long queues of taxis (over ranking)... There is a further problem, in that drivers from out of town are not familiar with the area and do not know where the passenger has asked to be taken to. If the passenger is also from out of town, they may not know the postcode, which reduces the value of satnavs."

Durham County Council has continued to review the situation as it develops. However, the council is not taking action to alter arrangements.

Appendix H: Wheelchair accessible vehicle policies – case studies

Aberdeen City Council

1. In Aberdeen, all hackney carriage vehicles must be wheelchair accessible vehicles (WAVs). This WAV approach has been in place since 1994. However, this has been challenged several times by the trade and Unite and has been under near constant review and consultation since around 2016.
2. The council introduced a policy in 1994 whereby new applications for taxi licences were required to be for accessible vehicles. An exemption was allowed for existing licence holders at that time which effectively meant that they could retain a non-accessible vehicle and even license a further non-accessible vehicle on the renewal of the licence or replacement of the vehicle. At that time, it was intended that there would be a gradual move to a 100 per cent accessible vehicle taxi fleet, but no backstop date was fixed for implementation.
3. The ratio of accessible vehicles began to fall in the 2010s – falling to below 50 per cent in 2016.
4. In 2006, the council removed the overall limit on the number of taxi licences which existed then, although all new applications still required to be for accessible vehicles. The policy was challenged in the case of Wilson versus Aberdeen City Council in 2007 and the Court of Session ruled that both the committee's policy and the 'two tier' system of licences that resulted (pre and post 1994) were valid.
5. A limit on the overall number of taxi licences was re-imposed on 6 June 2012 and the council undertook a consultation to review the accessible vehicle policy. The majority of consultees were in favour of an accessible vehicle taxi fleet and the council fixed a date of 6 June 2017 by which time all taxis would require to be accessible vehicles.
6. The council considered this the most efficient way of meeting the Public Sector Equality Duty imposed by the Equality Act 2010.
7. The policy was reviewed in 2016 and the approach to accessible vehicles was considered, but it was ultimately decided to retain the policy – although the matter was referred to Full Council for consideration.
8. Full Council upheld the decision to retain the 100 per cent accessible vehicle taxi fleet, but it amended the backstop date for implementation to 6 June 2018.

9. The council considered the issue again in 2017 following updated information from the Scottish Government, launching a consultation exercise on a mixed fleet policy.
10. The consultation indicated a preference for a mixed fleet and included claims that some mobility restricted persons cannot enter a WAV. This comment relates to problems encountered by ambulant disabled or mobility-restricted or elderly passengers when trying to enter WAVs carrying up to eight passengers, which tend to be higher off the road than saloon type vehicles.
11. In 2018, the council decided that all taxi user requirements should be considered and instructed the Chief Officer for Governance to:
 - prepare a report with suitable mixed fleet policy options for the split which would address all customer needs whether they are a wheelchair user, visually impaired or have other mobility requirements or other relevant disability
 - submit these options to the Licensing Committee meeting by June 2022 for consideration.
12. This issue is still under review.

Telford and Wrekin Council

13. At Telford and Wrekin, all hackney carriages must have provision for a minimum of one wheelchair.
14. In 1998, the council introduced a policy of an entirely WAV fleet of hackney carriages. A policy of only licensing vehicles that were approved by the London Carriage Office was already in place at this point, so it was just a matter of phasing out old non-accessible London Taxi Company (LTI) vehicles with newer, accessible LTC models.
15. The numbers of hackney carriages declined very gradually over the years. However, it is believed that this is not because of the WAV policy but rather owing to the growth of the private hire industry and owing to the fact that the borough does not have a typical city centre (Telford is made up of small district centres).
16. In 2017, owing to this decrease in numbers of hackney carriages in the borough, the council opened up the makes and models of vehicles allowed to acquire a licence as hackney carriages to include multi-purpose vehicles, providing they were able to accommodate a minimum of one wheelchair.

Torbay Council

17. Torbay council operates a mixed fleet, which has no set proportion of WAVs.
18. Between 2013 and 2017, the council undertook a great deal of review and research into the WAV issue. From 2013, there was an aspirational target of 20 per cent WAVs. A flexible approach whereby an age of vehicle allowance was added to WAVs (increasing maximum age of vehicles by two years to 10 years) was introduced between 2013 and 2017. The number of accessible vehicles increased from 8 per cent hackney carriages and 6 per cent private hire vehicles (PHVs) to 16 per cent of the total.
19. However, this caused certain problems, as drivers and operators could convert to a WAV to get an extra two years out of a vehicle, but that did not necessarily mean they had all the necessary equipment (for example, ramp for access) or training.
20. In 2015, a consultation was held; however, no option was universally backed.
21. 2016, a further consultation, specifically on reviewing any perceived lack of services for WAVs, was undertaken – this turned up no evidence of any problem.
22. Up to 2017, there had been no complaints and no disability groups had engaged with the consultations, suggesting no significant problem.
23. In addition, from 2017, a new private hire company was established that had a dedicated WAV fleet. This was not at the direction of the council but was promoted by the council.
24. This also encouraged an agenda change for the authority. Currently, the council operates a regulated service (169 hackney carriages in the borough – and will not accept applications for any more), but is now focusing on environmental issues.
25. The council is now undertaking a review to ban all petrol and diesel vehicles, but this has implications for WAVs (few, if any, eco models can accommodate WAV). As such, it is pushing this back to 2025 and hopes that more eco WAV vehicles are available by then.
26. Overall, for WAVs in the area, there is now no aspirational fixed figure and no appetite to return to this approach.

Calderdale Council

27. In Calderdale, all hackney carriage vehicles that operate out of Halifax are required to be a WAV. However, a small number of non-WAV saloon cars are allowed to operate outside of the town.

28. Following an issue that occurred in 2010, the council undertook a thorough review of its approach to WAV taxis – please note, this only applies to hackney carriage vehicles (HCVs).
29. The new policy stipulated that all new vehicles needed to be WAVs in Halifax – this is due to the nature of the town centre, the presence of an elderly population and the input from a very active disability partnership (which regularly tests the WAV capabilities of the fleet).
30. The fleet across the council is now 100 per cent WAVs, except for seven non-WAV saloon vehicles that mostly operate outside of Halifax. However, this is gradually diminishing naturally – while it is possible to transfer the licence to a new saloon, increasingly drivers are converting to WAVs anyway.
31. Private hire vehicles are not included in this – private hire control fee structures and there are concerns that they could price out wheelchair use. As such, this is now considered an enforcement, rather than a policy issue.
32. Calderdale has highlighted the need for good engagement with the trade and disability groups, as well as a long and engaged consultation. The council would also highlight taking a structured approach to change. As such, a policy whereby new vehicles must be WAV was considered the most progressive and gradual means to implement the change.

Brighton and Hove Council

33. Brighton and Hove council has been operating an approach whereby it adds five plates a year for WAVs, as a means to increase the WAV fleet. However, increasingly, this is seen as conflicting with emissions policies.
34. This managed growth policy has been in place since 2010. Essentially, the council carries out an unmet demand survey every three years. This tends to show no or insignificant unmet demand. Rather than having a blanket no plates policy, the council allows for limited managed growth (five plates a year issued on a waiting list) to allow flexibility and change in circumstances. The five plates can be for a WAV, electric or plug-in hybrid.
35. The result of this is a maintained rate of roughly 50 per cent WAVs of the total HCV fleet. Members and officers have been of the opinion that a mixed fleet is beneficial, as the council receives a number of complaints from some disability groups that the WAVs are not accessible and they prefer saloons.
36. In addition, when a private hire operator reaches 100 vehicles, there is a condition that 20 per cent of its fleet must be WAVs. However, this causes issues, with evidence showing that private hire WAVs account for only 1 per cent of pick-ups.

37. Increasingly, however, the WAV approach is considered to be in conflict with emissions policies. Similar to West Suffolk Council, Brighton and Hove declared a climate emergency in 2019 and has since adopted a robust carbon reduction programme.
38. As such, the council is presently undertaking a review of this approach, with a view to prioritising hybrid and electric vehicles over regular saloon and WAV alternatives.

Appendix I: Taxi data breakdown

Data summary

Total number of licences: 527
 Hackney carriage vehicle – 188
 Private hire vehicle – 339

Hackney carriage vehicle (HCV) analysis

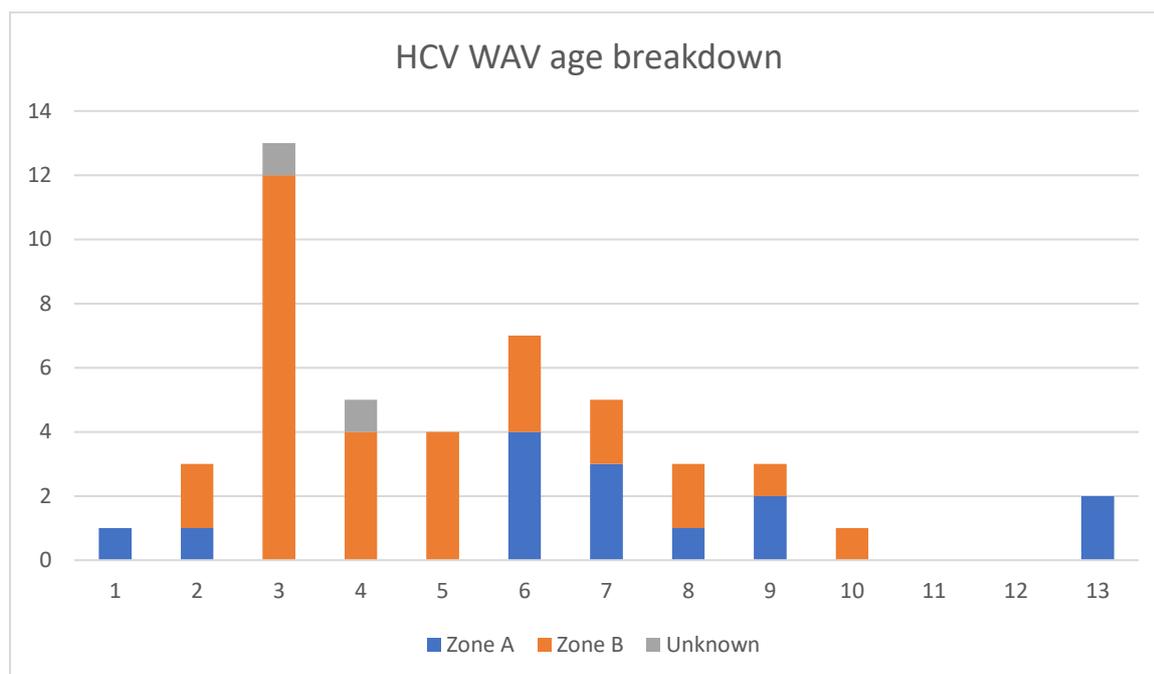
Non-wheelchair accessible vehicle – 141
 Wheelchair accessible vehicle – 47

Wheelchair accessible vehicle (WAV) data

Zone A – 14
 Zone B – 31
 Unknown – 2

Age breakdown

Age of vehicle	1	2	3	4	5	6	7	8	9	10	11	12	13
Number	1	3	13	5	4	7	5	3	3	1	-	-	2
Zone A	1	1	-	-	-	4	3	1	2	-	-	-	2
Zone B	-	2	12	4	4	3	2	2	1	1	-	-	-
Unknown	-	-	1	1	-	-	-	-	-	-	-	-	-



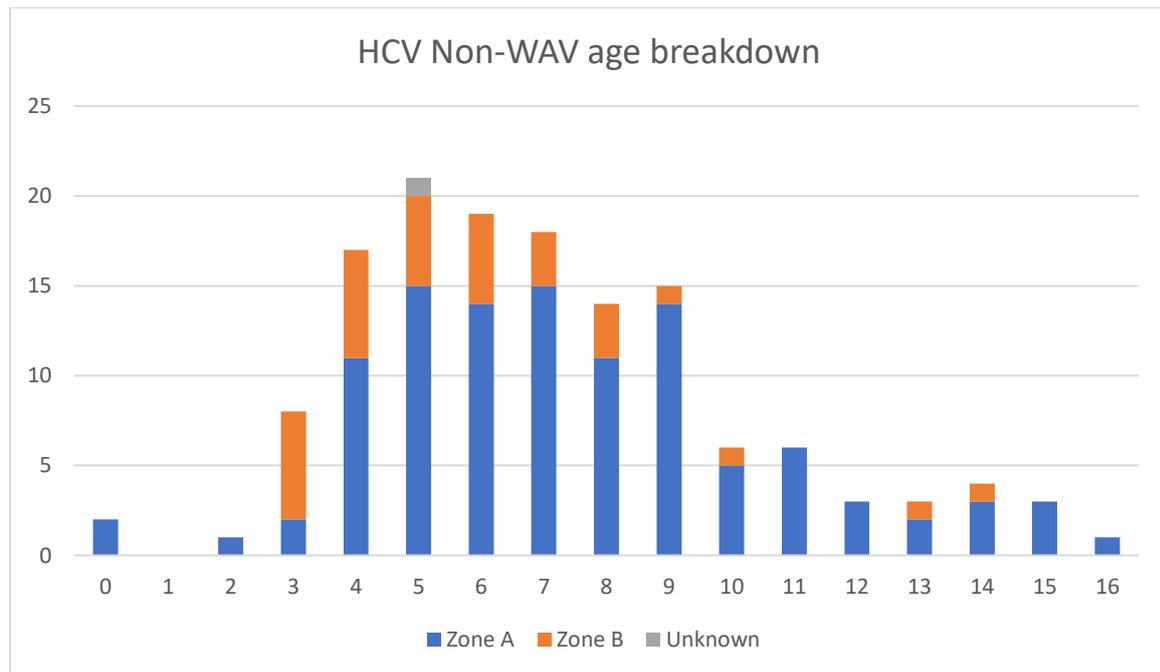
Total vehicles aged 7 years or over – 14
 Zone A – 8
 Zone B – 6

Non-WAV vehicle data

Zone A – 107
 Zone B – 33
 Unknown – 1

Age breakdown

Age of vehicle	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Number	2	-	1	8	17	21	19	18	14	15	6	6	3	3	4	3	1
Zone A	2	-	1	2	11	15	14	15	11	14	5	6	3	2	3	3	1
Zone B	-	-	-	6	6	5	5	3	3	1	1	-	-	1	1	-	-
Unknown	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	-	-



Total vehicles aged 7 years or over – 73
 Zone A – 63
 Zone B – 10

Private hire vehicle (PHV) analysis

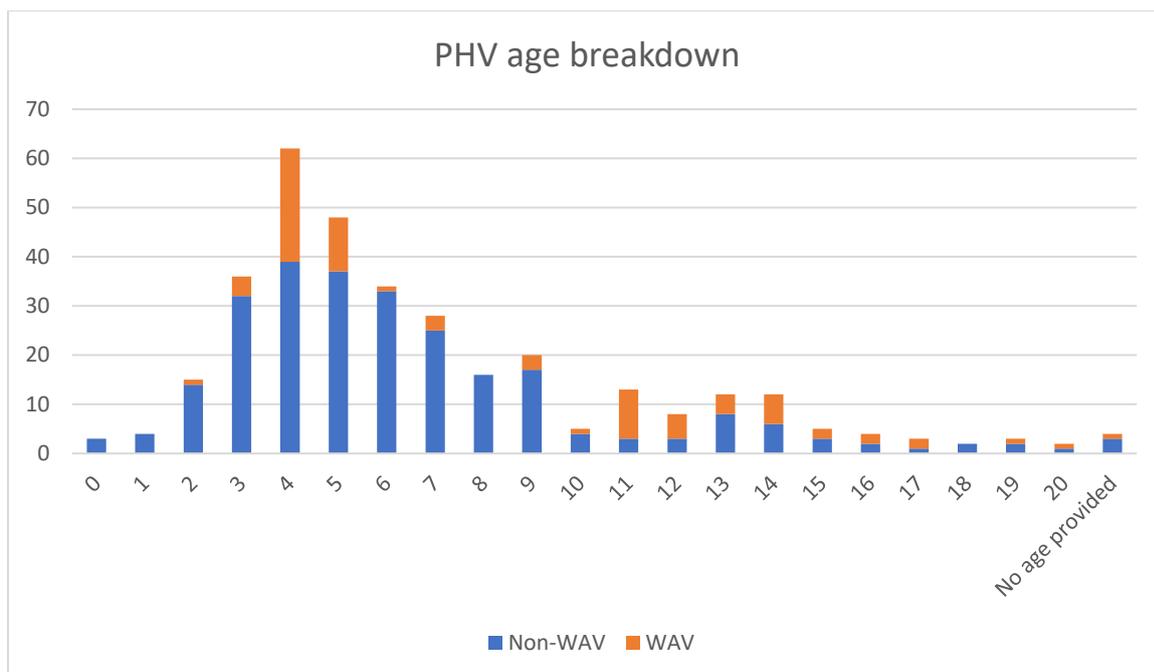
Total number of vehicles – 339

Taxi and Private Hire Vehicle Policy

Total number of WAVs – 81

Age breakdown

Age of vehicle	Number	WAV
0	3	-
1	4	-
2	15	1
3	36	4
4	62	23
5	48	11
6	34	1
7	28	3
8	16	-
9	20	3
10	5	1
11	13	10
12	8	5
13	12	4
14	12	6
15	5	2
16	4	2
17	3	2
18	2	-
19	3	1
20	2	1
No age provided	4	1



Total vehicles aged 7 years or older – 137
 Total number of WAVs aged 7 years or older – 40

New licence analysis

PHV licences

Total new licences – 47
 WAV licences – 8

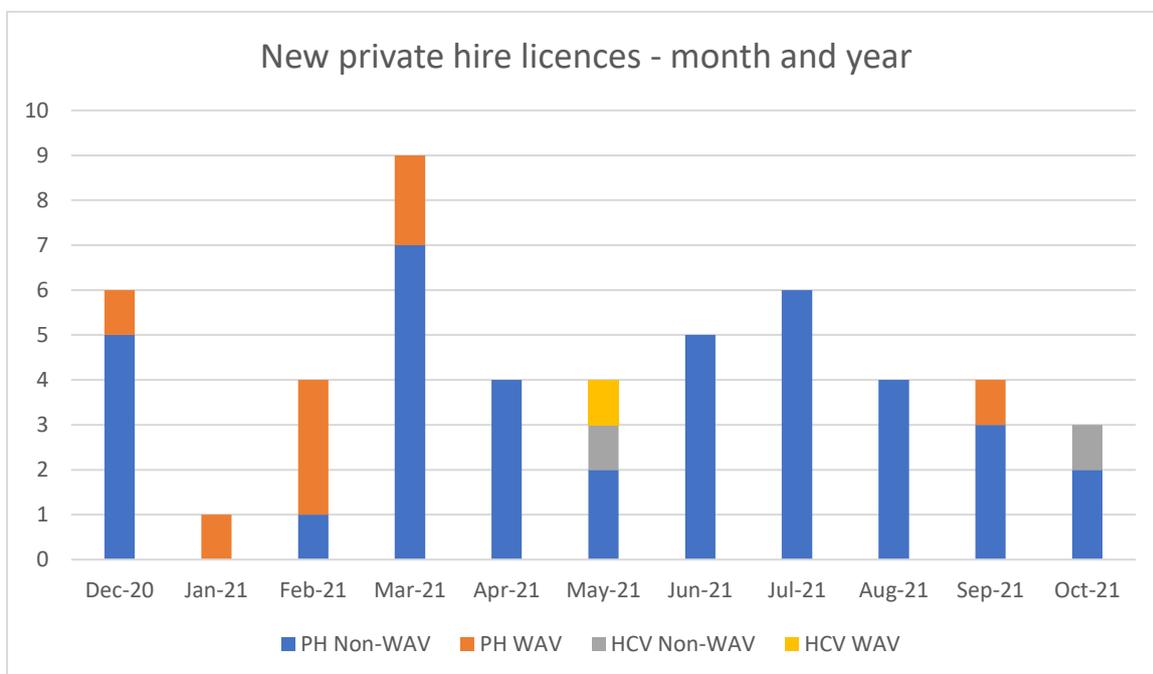
HCV licences

Total new licences – 3
 WAV licences – 1

New licence breakdown

Month and year	PHV non-WAV	PHV WAV	HCV non-WAV	HCV WAV
December 2020	5	1	-	-
January 2021	-	1	-	-
February 2021	1	3	-	-
March 2021	7	2	-	-
April 2021	4	-	-	-
May 2021	2	-	1	1
June 2021	5	-	-	-

July 2021	6	-	-	-
August 2021	4	-	-	-
September 2021	3	1	-	-
October 2021	2	-	1	-



Expired licences

Expired licences between October 2020 and September 2021

Combined licence (both PHV and HCV) – 45

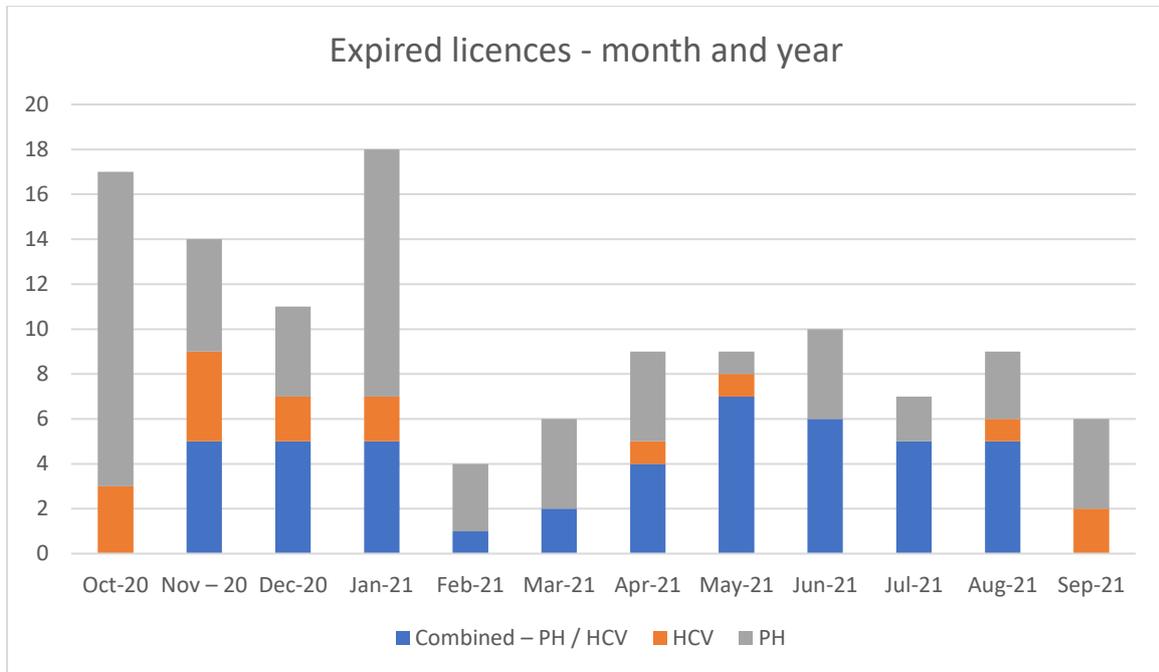
HCV – 16

PHV – 60

Expired licences breakdown

Month and year	Combined (PHV and HCV)	HCV	PHV
October 2020	-	3	14
November 2020	5	4	5
December 2020	5	2	4
January 2021	5	2	11
February 2021	1	-	3
March 2021	2	-	4
April 2021	4	1	4

May 2021	7	1	1
June 2021	6	-	4
July 2021	5	-	2
August 2021	5	1	3
September 2021	-	2	4



Appendix J: Analysis of mileage of existing hackney carriages licensed in West Suffolk

Zone	First year mileage (usually 2019)	Second year mileage (usually 2020)	Additional (pro-rata and notes on year of mileage)	Additional calculation for pro-rata	Year total	Estimate for daily mileage (Calculation assumes that mileage can be broken down to a five-day working week)
A	186,679	370,286			183,607	514
A	221,301	382,723	Data taken from 2020 and 2021 MOTs		161,422	452
A	123,001	202,311			79,310	222
A	138,058	217,032			78,974	221
A	416,277	488,558			72,281	202
A	194,759	262,771			68,012	191
B	60,937	99,988	7 months	27,894	66,945	188
A	229,620	290,643			61,023	171
B	49,309	124,140	15 months	-14,966	59,865	168
A	97,200	152,698			55,498	155
B	25,503	78,707	Data taken from 2018 and 2019 MOTs		53,204	149
B	327,639	380,755	Data taken from 2018 and 2019 MOTs		53,116	149
B	27,226	57,934	7 months	21,934	52,642	148
B	167,345	219,243			51,898	145

Zone	First year mileage (usually 2019)	Second year mileage (usually 2020)	Additional (pro-rata and notes on year of mileage)	Additional calculation for pro-rata	Year total	Estimate for daily mileage (Calculation assumes that mileage can be broken down to a five-day working week)
A	253,320	304,556			51,236	144
A	162,598	213,224			50,626	142
A	210,377	259,837			49,460	139
B	77,784	127,104			49,320	138
B	69,743	118,798	Data taken from 2018 and 2019 MOTs		49,055	137
A	71,254	117,279			46,025	129
B	131,845	176,881	Data taken from 2018 and 2019 MOTs		45,036	126
B	157,824	202,452	Data taken from 2020 and 2021 MOTs		44,628	125
B	155,152	199,318			44,166	124
A	174,186	218,084			43,898	123
B	61,807	105,402			43,595	122
B	102,819	160,178	16 months - data taken from 2018 and 2019 MOTs	-14,340	43,019	121
B	253,804	296,807			43,003	120
B	25,633	68,043	Data taken from 2018 and 2019 MOTs		42,410	119
A	152,404	187,847	10 months	7,089	42,532	119
A	104,782	146,929			42,147	118

Zone	First year mileage (usually 2019)	Second year mileage (usually 2020)	Additional (pro-rata and notes on year of mileage)	Additional calculation for pro-rata	Year total	Estimate for daily mileage (Calculation assumes that mileage can be broken down to a five-day working week)
B	53,886	95,655			41,769	117
A	188,006	229,802			41,796	117
B	101,667	143,249			41,582	116
A	312,072	353,362			41,290	116
B	21,997	62,671	Data taken from 2018 and 2019 MOTs		40,674	114
A	40,324	80,647			40,323	113
A	45,336	85,423			40,087	112
B	55,398	101,728	14 months	-6,619	39,711	111
B	55,375	93,572	Data taken from 2018 and 2019 MOTs		38,197	107
A	39,956	77,664	Data taken from 2020 and 2021 MOTs		37,708	106
A	20,481	58,130	Data taken from 2020 and 2021 MOTs		37,649	105
B	119,848	155,422	Data taken from 2018 and 2019 MOTs		35,574	100
B	54,244	89,479	Data taken from 2018 and 2019 MOTs		35,235	99
B	68,958	103,993			35,035	98
A	46,210	81,202	Data taken from 2018 and 2019 MOTs		34,992	98
B	48,583	83,064			34,481	97
A	30,187	64,571	Data taken from 2018 and 2019 MOTs		34,384	96

Zone	First year mileage (usually 2019)	Second year mileage (usually 2020)	Additional (pro-rata and notes on year of mileage)	Additional calculation for pro-rata	Year total	Estimate for daily mileage (Calculation assumes that mileage can be broken down to a five-day working week)
A	170,937	193,259	8 months	11,161	33,783	95
A	206,176	240,076			33,900	95
B	80,006	112,833			32,827	92
B	28,404	61,338			32,934	92
B	212,641	245,026			32,385	91
B	170,673	202,948	Data taken from 2018 and 2019 MOTs		32,275	90
A	448,093	480,162			32,069	90
A	301,870	333,583			31,713	89
A		31,325	New car		31,325	88
A	109,162	140,016			30,854	86
B	45,266	55,094	4 months	19,656	29,484	83
A	34,317	51,602	7 months	12,346	29,631	83
A	318,223	347,817	Data taken from 2018 and 2019 MOTs		29,594	83
B	145,239	174,673	Data taken from 2018 and 2019 MOTs		29,434	82
B	174,686	203,976			29,290	82
B	81,628	110,852			29,224	82
B	96,905	125,997	Data taken from 2020 and 2021 MOTs		29,092	81

Zone	First year mileage (usually 2019)	Second year mileage (usually 2020)	Additional (pro-rata and notes on year of mileage)	Additional calculation for pro-rata	Year total	Estimate for daily mileage (Calculation assumes that mileage can be broken down to a five-day working week)
B	63,594	92,441			28,847	81
B	98,643	127,505			28,862	81
B	96,905	125,997			29,092	81
A	131,666	160,724			29,058	81
A	217,900	245,553			27,653	77
A	191,103	218,641			27,538	77
A	149,721	176,734			27,013	76
B	202,945	229,432			26,487	74
A	116,646	142,551			25,905	73
A	77,505	92,540	7 months – data taken from 2020 and 2021 MOTs	10,739	25,774	72
B	59,177	82,199			23,022	64
A	73,061	93,700	10 months	2,064	22,703	64
B	3,178	25,618	11 months		22,440	63
A	216,808	239,240			22,432	63
B	64,872	86,845			21,973	62
A	41,869	63,855			21,986	62

Zone	First year mileage (usually 2019)	Second year mileage (usually 2020)	Additional (pro-rata and notes on year of mileage)	Additional calculation for pro-rata	Year total	Estimate for daily mileage (Calculation assumes that mileage can be broken down to a five-day working week)
B	189,466	211,226			21,760	61
A	160,678	181,847			21,169	59
B	319,088	339,337	Data taken from 2018 and 2019 MOTs		20,249	57
B	50,761	70,046			19,285	54
B	26,441	45,339			18,898	53
A	74,110	92,926			18,816	53
A	82,402	101,441	Data taken from 2020 and 2021 MOTs		19,039	53
B	63,864	80,014			16,150	45
A	57,671	72,210			14,539	41
B	56,692	67,281	10 months	2,118	12,707	36
A	128,766	141,166	Data taken from 2018 and 2019 MOTs		12,400	35
A	215,318	227,663	Data taken from 2020 and 2021 MOTs		12,345	35
A	285,424	296,623			11,199	31
B	27,984	38,254			10,270	29
A	99,271	109,614	Data taken from 2020 and 2021 MOTs		10,343	29
B	64,039	73,854			9,815	27
A	58,321	67,927			9,606	27

Zone	First year mileage (usually 2019)	Second year mileage (usually 2020)	Additional (pro-rata and notes on year of mileage)	Additional calculation for pro-rata	Year total	Estimate for daily mileage (Calculation assumes that mileage can be broken down to a five-day working week)
B	21,050	29,206			8,156	23
A	60,853	64,758	6 months – data taken from 2020 and 2021 MOTs	3,905	7,810	22
B	69,765	71,202	11 months	131	1,568	4

Overall, if we remove the highest two and lowest two results and consider the next two respectively as the basis for calculation:

Total average: 97.5

(Please note: due to some outlying results, the two highest and two lowest mileage estimates have been taken out of the calculation for the total average estimate.)

Sum	9,360
Count	98
Median	92
Geometric mean	87.623058370872
Largest	222
Smallest	23
Range	199

Zone A average: 112.88

Sum	5,644
Count	50
Median	92.5
Geometric mean	91.318826363174
Largest	514
Smallest	22
Range	492

Zone B average: 94.16

Sum	4,708
Count	50
Median	92
Geometric mean	82.314947559373
Largest	188
Smallest	4
Range	184

Appendix K: Standard and electric vehicle data

Standard vehicles

Type	Vehicle	Price range – used (2017)
Saloon and estate taxis	Auris (Toyota)	£10,450 to £18,429
	Avensis (Toyota)	£11,500 to £17,450
	E-class (Mercedes)	£22,980 to £31,000
	Insignia (Vauxhall)	£9,775 to £18,047
	i40 (Hyundai)	£10,098 to £14,495
	Mondeo (Ford)	£14,488 to £18,400
	Prius (Toyota)	£18,000 to £25,300
	Superb (Skoda)	£13,779 to £21,995
	308 SW (Peugeot)	£10,991 to £14,000
Multi person vehicle taxis	Galaxy (Ford)	£14,000 to £22,500
	Sharan (Volkswagen)	£17,698 to £28,500
	Transporter (Volkswagen)	£27,000 to £40,000
Purpose-built wheelchair accessible taxis	Eurobus (Tepee) (Peugeot)	£14,700 to £15,000
	Trafic (Renault)	£16,700 to £22,200
	Vito (Mercedes)	£26,300 to £35,000

Electric or alternative vehicles

Make	Vehicle type	Registration year	Range (miles)	Engine	Price (used)
Nissan Leaf	Hatchback	2017	107	80 kW	£12,000 to £17,000
Hyundai Ioniq	Hatchback	2017	110 to 124	32 kW	£18,000 to £20,000
Tesla S P85D	Hatchback	2017	275 to 285	345 kW	£35,000 to £72,000
MG MG5	Estate	2021	250	61.1 kW	£21,500 to £31,000
Toyota Mirai	Saloon	2017	2,131	Hydrogen fuel cell	£24,000 to £25,000

Evidence to suggest that Nissan Leaf is the most popular electric vehicle (EV) taxi in the world:

Taxi and Private Hire Vehicle Policy

- Electrek – Nissan’s all-electric Leaf is becoming increasingly popular with taxi companies: details can be viewed [here](#)
- Nissan Motor Corporation – Nissan lands world’s largest electric taxi fleet deal: details can be viewed [here](#).

Appendix L: Wheelchair accessible vehicle (WAV) alternatives and costs

Motability sets out a section on WAV sizes, with prime examples of each.

Motability – WAV sizes explained: view [here](#).

The cost to convert a standard vehicle (£5,000 to £10,000) is set out in a blog from Thorntrees Garage. Almost any vehicle can be a candidate for conversion – however, enough height is required for a wheelchair user in their chair to get inside with a space above.

Thorntrees Garage – How much does it cost to make a car wheelchair accessible: view [here](#).

WAV size	Make and model	Cost – used (2017)
Small – similar to sports utility vehicle (SUV) size Features: all small WAVs will be fitted with a ramp for entry, have at least one passenger seat in the rear, but will seat no more than five including the wheelchair passenger and driver and, due to their size, these WAVs tend to feel the most similar to driving a standard car.	Fiat Qubo	£11,000 to £14,500
	Fiat Doblo	£10,000 to £11,000
	Citroen Berlingo	£13,000 to £16,000
	Peugeot Partner (Tepee)	Covered already
	Ford Tourneo Connect	£14,000 to £16,000
	Kia Soul	£13,000 to £19,000 (if full EV)
	Volkswagen Caddy	£17,500 to £21,000
Medium to small WAVs – multi-purpose vehicle (MPV) size Features: these conversions tend to include six seats including the wheelchair passenger and driver. The vehicle will have more space than a small WAV, which means extra passenger seats, more room for equipment or a more flexible seating position. Like the small WAVs, these vehicles will have more of a car-like feel in terms of size. With this size	Volkswagen Caddy Maxi	£17,500 to £24,000
	Ford Grand Tourneo Connect	£17,500 to £22,000

WAV size	Make and model	Cost – used (2017)
<p>WAV, the wheelchair user can be positioned behind the second row of seats in the rear most part of the car, but many conversions have options to sit further up in between the second row of rear seats.</p>		

Appendix M: Complete Transport Solutions (CTS) reports 2021

Wheelchair accessible vehicles – please view here.



West Suffolk
Disability Access Brief

Zone review



LVSA Jan 2022 West
Suffolk Zone Consideration

Appendix N: West Suffolk electric vehicle (EV) driver case study

The following is based on answers provided by a HCV driver in West Suffolk.

I have been driving an EV since July 2021 and currently cover a late shift, usually between 2 and 11pm. This is Monday to Friday and all day on Sunday. My weekdays start with a school run going to Lakenheath, Beck Row and Kennett. Most of my other work is for regular clients in and around Brandon.

I would estimate my average daily mileage to be around 150 miles for these jobs. In this capacity, I have already driven 18,000 miles and am saving approximately £100 for every 1,000 miles covered (which doesn't take into account zero road tax and reduced servicing costs). This equates to about 4p per mile compared to 13.7p per mile for my diesel Skoda Superb.

I purchased the Skoda from new, paying a deposit and using finance, for £39,930 including value added tax (VAT). Subtract from this the Government grant of £2,500 and a green business grant of £1,000 from West Suffolk Council. This funding was not the deciding factor for me personally, but £3,500 off the purchase price is obviously a good incentive.

EVs are a lot more expensive to buy at the moment. However, you have to take into account whole life costs. The first 12,000 miles driven have cost me a total of £398.28 on my home charger with £58.03 on public chargers. In my old diesel Skoda Superb, this same mileage would have cost me in excess of £1,500 (more at current prices). Currently, there is no road tax for EVs. And because an EV doesn't have an engine, the servicing and maintenance costs are significantly reduced.

The savings I am making from fuel alone cover half of my monthly repayments for the car.

Driving the Skoda Enyaq is a joy. The quietness, the smoothness and lack of vibrations compared to a combustion engine vehicle make for a much more pleasurable driving experience and I find myself a lot less tired at the end of a long, busy shift. All the passengers like the car and I am constantly being asked questions about how good the car is to own (even from dedicated petrol heads).

While the range of the vehicle was something that concerned me prior to owning the car, the research I undertook before purchasing my EV reassured me that it would be sufficient. Having driven the car for around half a year now, I have little or no range anxiety. The few times that it has been necessary for me to use public charging, I have been able to pre-plan where, when and for how long I've needed to stop.

With this said, I would say that the current EV infrastructure in West Suffolk, and East Anglia as a whole, is very poor. I would say that one of the reasons I've been able to pre-plan charging without issue is that demand is currently very low, so there's been little competition for charging points. Getting closer to the Taxi and Private Hire Vehicle Policy

2030 deadline for diesel and petrol car sales, it's only reasonable to presume that demand is going to increase. If the infrastructure doesn't improve, then there could be problems. There needs to be a lot more locations available with a higher charging capacity of a minimum 50kwh.

The positive spin on this is simple – if the availability of reliable charging points was more substantial, it would help towards making EV adoption more appealing.

Despite this, my experience of driving an EV in West Suffolk has been enjoyable. Apart from the obvious environmental benefits and the long-term cost savings, an EV is a pleasure to own and drive.

Appendix O: West Suffolk Council taxi vision

Our shared vision for West Suffolk taxi services

Vision statement

To ensure the taxi and private hire sector is a strong and professional body, which provides safe accessible and high quality services to residents, businesses and visitors across the whole district.

West Suffolk Council's priorities

This aligns with West Suffolk Council's strategic objectives as follows:

- Growth in West Suffolk's economy for the benefit of all our residents and UK plc
- Resilient families and communities that are healthy and active.

The taxi sector

West Suffolk Council, as the regulator, will work with the taxi industry to ensure the taxi service supports the district through the fast, efficient and reliable movement of people and goods. This will be achieved by:

- **a safe fleet** – the industry must safeguard vulnerable individuals by requiring drivers to have appropriate checks and training. The safety standards set by government must be met, with appropriate equipment and training utilised to ensure that vulnerable residents can be adequately served
- **an accessible fleet** – the industry will retain sufficient provision of wheelchair accessible vehicles for disabled residents to access shops, services, and other activities. The level of wheelchair accessible vehicles is dictated solely on the needs of West Suffolk communities
- **a green fleet** – the fleet will contribute to the reduction of greenhouse gas emissions by utilising more environmentally friendly vehicles, such as electric and hybrid
- **a thriving fleet** – West Suffolk Council recognises the significant contribution that taxi businesses make to the local economy and the role they play in leisure, education, and tourism. As such, the council wishes to provide support to these businesses to grow and flourish, while ensuring they operate safely. The council will always seek to work in a positive partnership by maintaining an open and active forum with licence holders and applicants in a way that minimises the burden and cost of regulation.