

West Suffolk Council taxi policy review: consultation survey summary

Background

1. Public consultation took place between 23 March and 18 May 2022 on the review of the West Suffolk taxi policy.
2. West Suffolk Council has responsibility for licensing hackney carriage vehicles (HCV) and private hire vehicles (PHV), drivers and operators across the West Suffolk area. The purpose of regulation is to ensure that the vehicles used, and the services provided are of the highest quality - professional and safe.
3. Since 2020, the council has been carrying out an in-depth study of taxi provision in West Suffolk, focusing on the following areas:
 - Wheelchair accessible vehicle (WAV) provision
 - The impact of merging Taxi zones (currently we have two zones, Zone A former Forest Heath and Zone B former St Edmundsbury)
 - The age of the taxi fleet.
4. Consideration was also given to future requirements of an environmentally friendly taxi fleet and the impact of COVID-19.
5. The review has brought together the perspectives of various stakeholders and the trade alongside data and other information from a range of case studies and previous reports. A consultant was also commissioned to undertake two specific surveys, one on taxi zones and the other on wheelchair accessible vehicles, which ascertained the views of the trade and disabled users.
6. In order to work towards a long-term vision, the review has proposed three changes to the current policy, which are as follows:
 1. To remove all wheelchair accessible vehicle (WAV) requirements for hackney carriage vehicle (HCV) licensees
 2. To merge the two taxi zones into one single zone
 3. To increase the maximum age of vehicle limit to 15 years old.
7. The consultation was launched to ascertain views on our proposed changes prior to any decision being made.

Methodology

8. During the consultation period, views were sought from the public, members of the taxi trade, disability groups, local businesses, town and parish councils and other community groups or organisations within the West Suffolk area.
9. An online response form was created, and this was published through media, website, social media, councillors, staff and partner organisations, such as the

Business Improvement Districts (BIDs) and the Suffolk Chamber of Commerce.

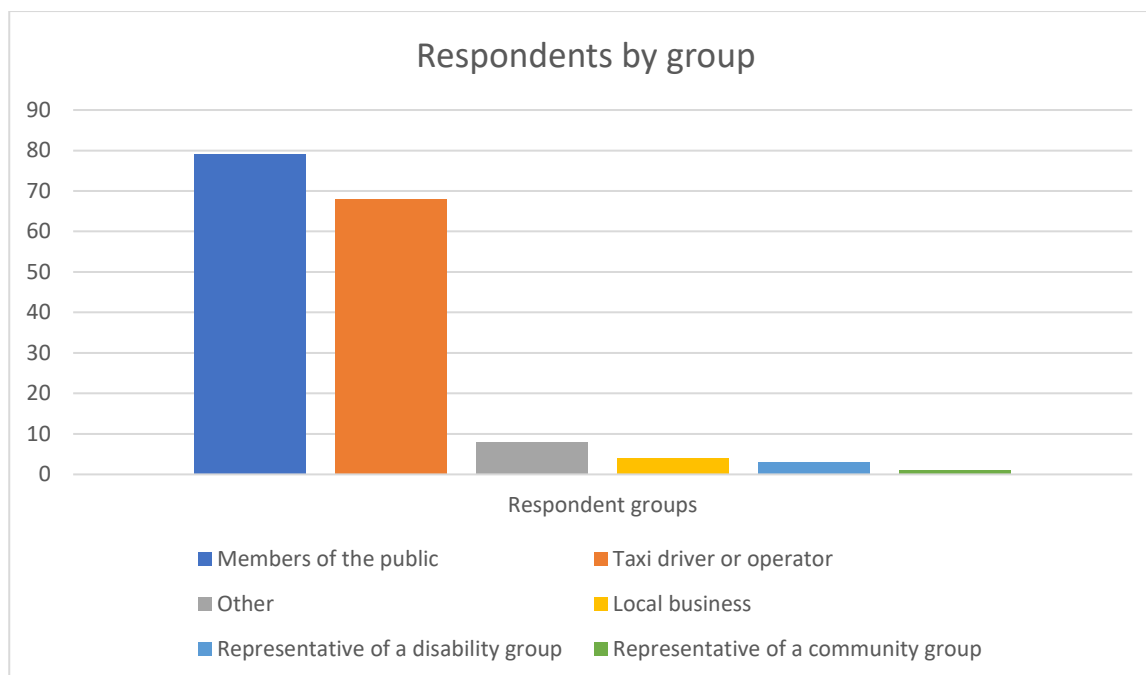
10. Efforts to ensure strong engagement with the consultation with the public and key stakeholders were extensive. This included:

Stakeholder	Method	Dates of engagement
Members of the public	Press releases	<ul style="list-style-type: none"> • 23 March
	Social media posts (including Tweets and Facebook posts shared into more than 50 Facebook groups)	<ul style="list-style-type: none"> • 23 March • 28 March • 31 March • 1 April • 5 April • 13 April • 26 April • 3 May • 6 May • 9 May • 11 May • 16 May
Taxi licensees	Direct email	<ul style="list-style-type: none"> • 23 March • 6 May • 13 May
	Drop-in sessions	<ul style="list-style-type: none"> • 30 March • 5 April • 11 April
Community and disability groups	Direct email	<ul style="list-style-type: none"> • 23 March • 1 April • 26 April • 4 May • 10 May
	Drop-in sessions	<ul style="list-style-type: none"> • 6 April • 13 April
Parish and town councils	Direct email	<ul style="list-style-type: none"> • 23 March
Local businesses	Newmarket Business Innovation District (BID) Newsletter	<ul style="list-style-type: none"> • 14 April • 13 May
	Bury St Edmunds BID Newsletter	<ul style="list-style-type: none"> • 13 May

11. At the time the consultation closed, 164 online forms had been completed. This report outlines the results from the analysis of quantitative data and themes that can be drawn from the qualitative (free text) data.
12. Section 1 of this report outlines the type of respondents who took part. Sections 2 - 4 outline the specific survey results regarding the council's proposals. Section 5 sets out any additional or alternative suggestions respondents may have provided.
13. As different proposals impact different groups, there is additional breakdown of taxi responses under the proposal to merge the zones, and disability groups and respondents with a disability under the proposal to remove the WAV requirement.
14. Please note:
 - All questions are listed thematically to highlight the key findings of the consultation – namely whether there was agreement on the councils' proposals to merge the zones, remove the WAV requirement and increase the maximum age of vehicle limit.
 - 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 fully eliminate any degree of judgement or subjectivity.

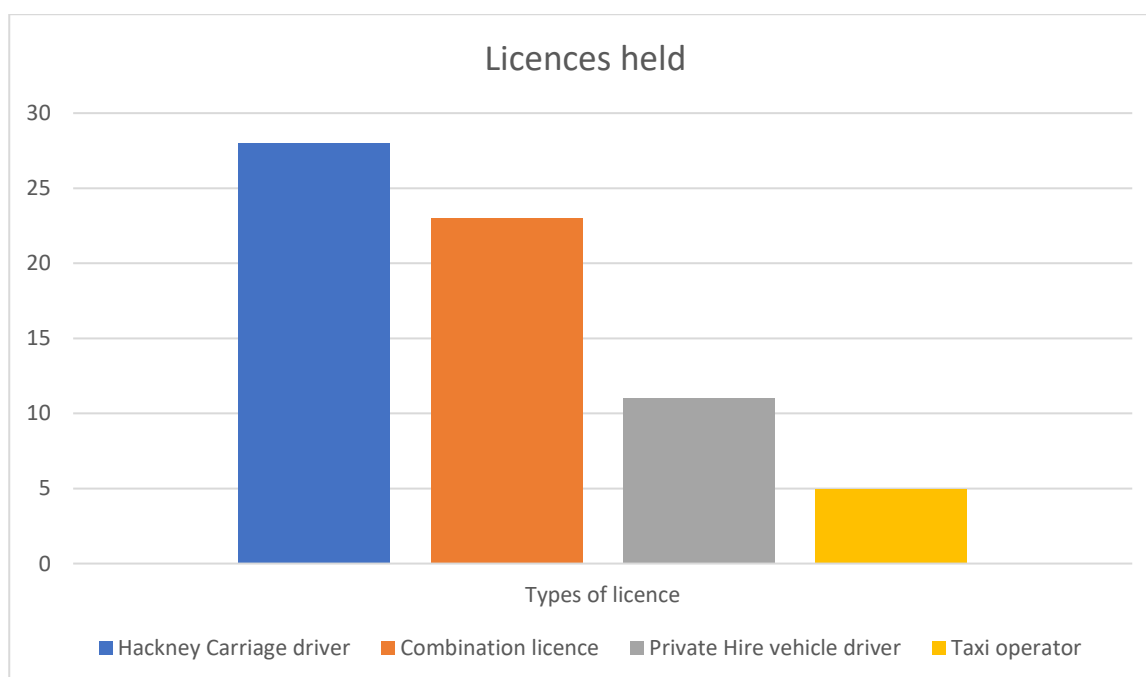
Section 1: About the respondents

15. Of a total 164 respondents, 163 provided details regarding what group of respondents they represented. The largest group, with 79 respondents, were members of the public (48.5 per cent). 68 (41.7 per cent) responded to the survey as representatives of the taxi trade. Eight respondents responded as 'other', with seven providing a free text answer to provide further explanation. Four were representatives of parish or town councils (please note: the only town or parish councils to identify themselves were Haverhill Town Council and Risby Parish Council); one responded as a disabled member of the public and service user; one responded as a private hire vehicle operator; and one identified as a local councillor.
16. A further four respondents (2.5 per cent) responded as local businesses, two responded as a disability group (1.2 per cent) and one as a community group (0.6 per cent). A free text response was provided by three respondents to name the group they were responding on behalf of. These groups were:
 - Haverhill Disability Forum
 - CMT Friends UK
 - Risby Parish Council (please note: this answer is counted as part of the tally of Parish and Town councils).



Further breakdown of taxi industry respondents

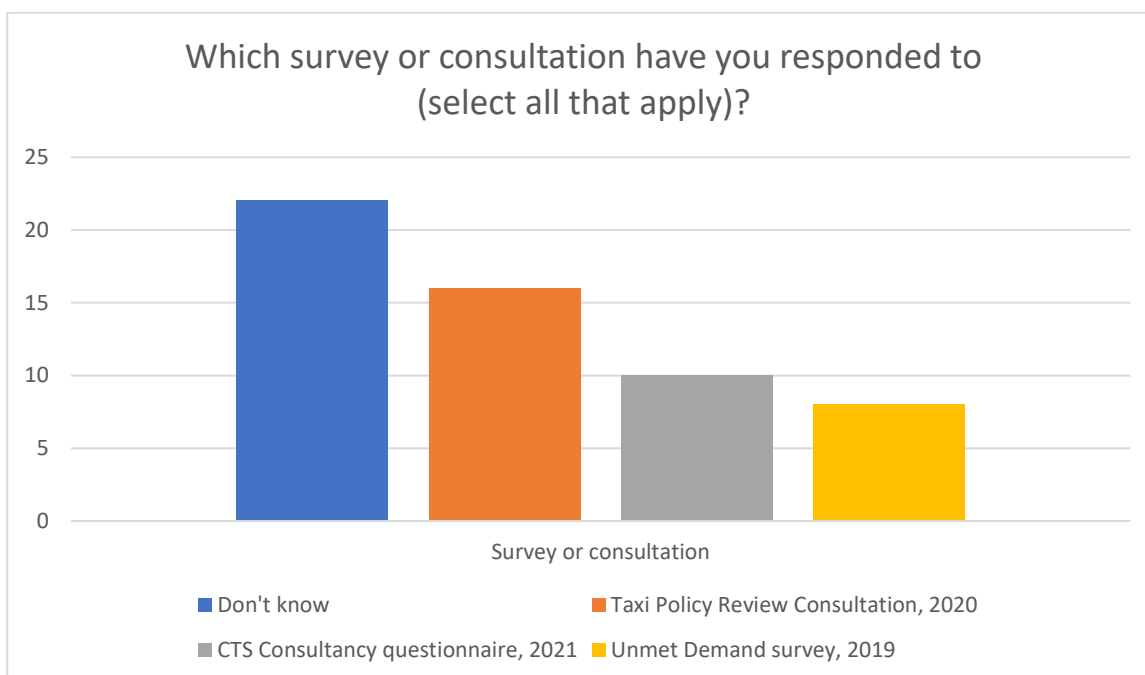
17. Respondents who identified as members of the taxi trade were asked to provide further information. Of the 68 that responded, 67 provided details of the kinds of licences they hold with the council. 28 (41.8 per cent) were hackney carriage drivers; 23 (34.3 per cent) held a combination licence; 11 (16.4 per cent) were private hire vehicle drivers; and five (7.5 per cent) identified as taxi operators.



18. Members of the taxi industry were also asked whether they had previously responded to a consultation or survey carried out by the council or on the council's behalf. Of 68 respondents, 30 (44.1 per cent) stated that they had;

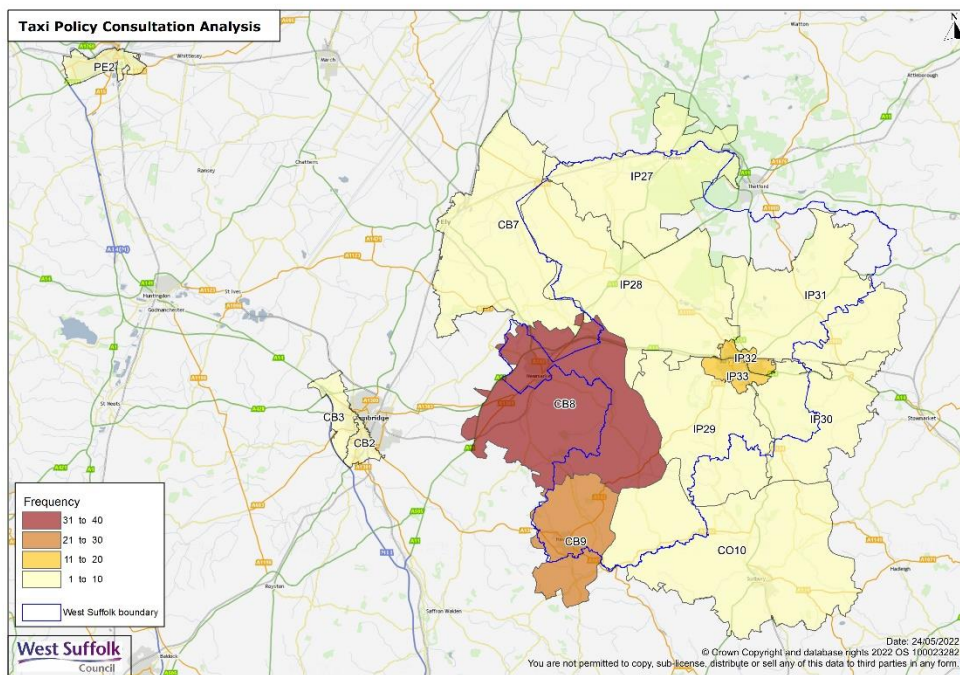
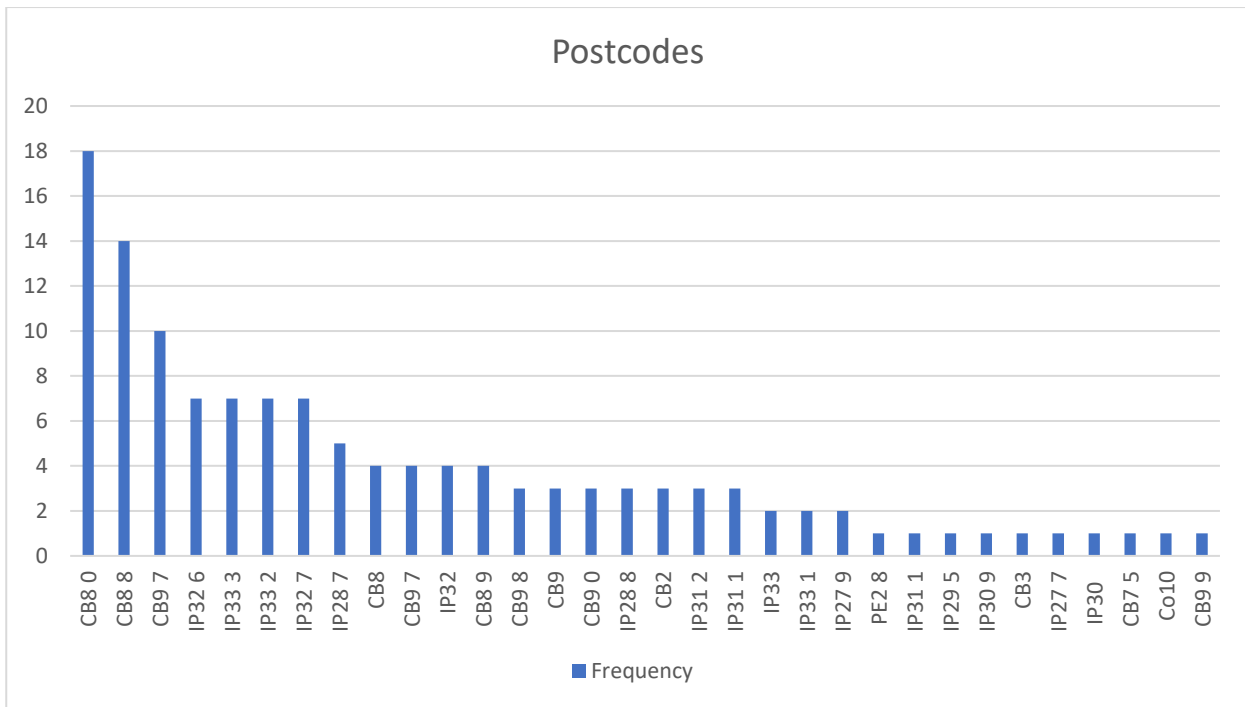
24 (35.3 per cent) said that they had not; and 14 (20.6 per cent) responded 'don't know'.

19. The 44 taxi respondents that answered 'yes' or 'don't know' were invited to indicate which survey or surveys they had previously responded to. Of 44 respondents, 22 (50 per cent) stated that they 'don't know'; 16 (36.4 per cent) said they had responded to the taxi policy review consultation, 2020; 10 (22.7 per cent) responded to the CTS Consultancy questionnaire, 2021; and eight responded to the Unmet Demand Survey, 2019. One respondent answered 'other' and stated in free text that the survey previously responded to was 'Zone A B together' – this could refer to the 2020 consultation, which asked a question on merging the zones.



Respondent location

20. Of those respondents that gave a postcode, 97 per cent were located in West Suffolk (please note: 138 respondents provided a postcode. However, six postcodes were not real, so not considered as a part of this analysis). Three respondents were based in Cambridge, and one respondent stated their location as Lincolnshire.



Gender

- The survey was completed by 96 males and 41 females, with 10 stating 'Prefer not to say'. Two respondents answered, 'in another way' and a further six provided comment.

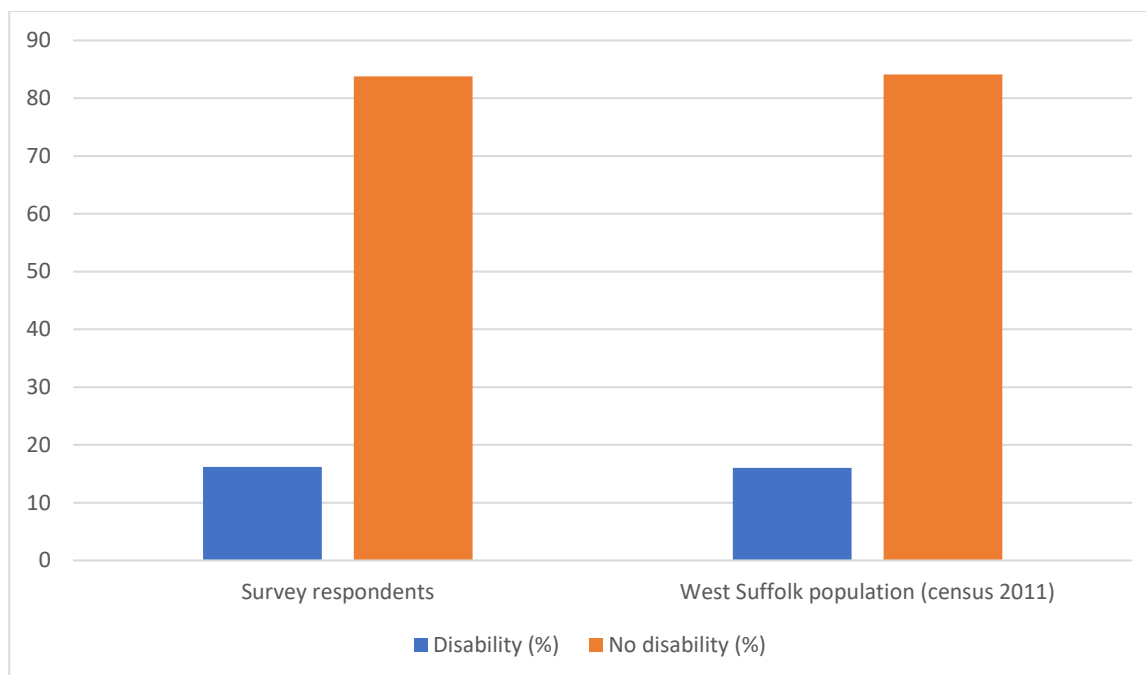
Comments	Frequency
Doesn't matter – no bearing on survey	2
Male	2
Active public transport and taxi user	1
Parent to wheelchair user – need for more appropriate transport in Newmarket	1

Age and health-disability

22. The age breakdown (see chart below) shows a larger proportion of older people completed the survey; ages 45 to 70+ represents 62 per cent of the total. There is no representation from those aged under 25.

Age breakdown of respondents		
Age categories	% in each category	West Suffolk % (2020)
0-17	0	21.2
18-24	0	6.8
25-34	14.3	13.3
35-44	23.8	12
45-59	35.3	19.4
60-69	15	11
70+	11.6	16.4

23. Of 148 respondents that provided details of whether they had any longstanding illness, disability or infirmity, 24 (16.2 per cent) responded that they did. According to 2011 census data, around seven per cent of West Suffolk residents have a severe disability, and around 9 per cent a limited disability. As such, the survey sample is broadly representative of the West Suffolk population.



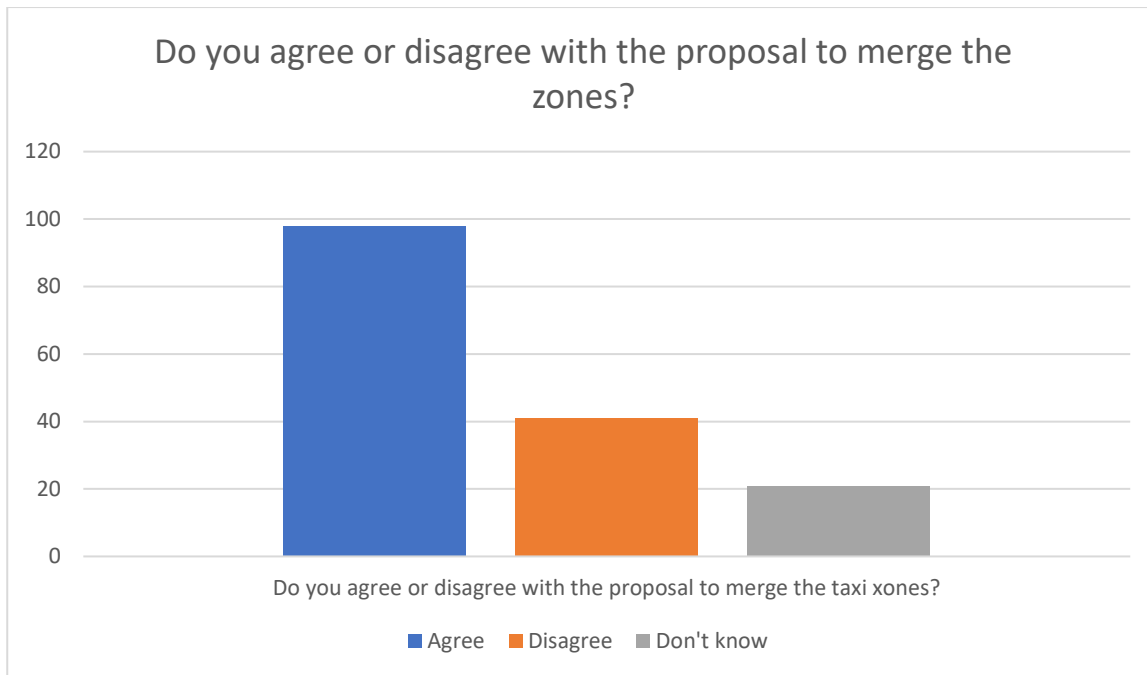
Equalities information

24. 139 respondents answered questions on ethnic origin. Of all respondents, 107 identified as English, Welsh, Scottish, Northern Irish or British (77 per cent). 13 (9.4 per cent) respondents identified as any other White background – of this group, six respondents added a self description: two described themselves as white European; two as east European or Romanian; one as white; and one stated that they do not self-describe.
25. Five respondents (3.6 per cent) selected 'any other ethnic group' and all respondents provided an additional free text description. Two respondents self-described as 'earthling' or citizen of planet earth; one respondent stated their ethnicity as Cypriot; one as east European; and one as British born in Turkey.
26. Four respondents (2.9 per cent) stated their ethnicity as Pakistani; two (1.4 per cent) as Indian; two Bangladeshi; and two Arab. One respondent (0.7 per cent) stated their ethnicity as Irish; one as white and Asian; one as any other Mixed or Multiple ethnic background, for which the respondent self-described as British born in UK to Turkish Cypriot parents; and one respondent as any other Asian background, for which the respondent self-described as Asian and Sri Lankan.

Section 2: Questions 6 and 7

Proposal to merge the taxi zones

27. Questions 6 and 7 seek to gauge whether there is agreement to the proposal to merge the taxi zones. Of 160 responses, 98 (61.3 per cent) agreed to merging the zones. 41 (25.6 per cent) answered that they disagreed and 21 (13.1 per cent) responded that they did not know.



28. Of the 98 respondents that agreed to the proposal, 49 were members of the public, 37 were members of the taxi industry, three represented local businesses, one was a representative of a community group, and seven respondents were from the 'Other' group.
29. Agreement varied by respondent type, with 100 per cent of community groups, 87 per cent of the 'other' group respondents, 75 per cent of businesses, 65.6 per cent of members of the public, and 55.2 per cent of taxi representatives agreeing with the proposal. No respondents representing disability groups agreed with the proposal (all responded 'don't know').
30. These figures were reinforced with 41 respondents providing a free text reason for their answers. The most frequent reasons given were that it would allow more coverage or flexibility for the service provided, or that it was generally a good idea.

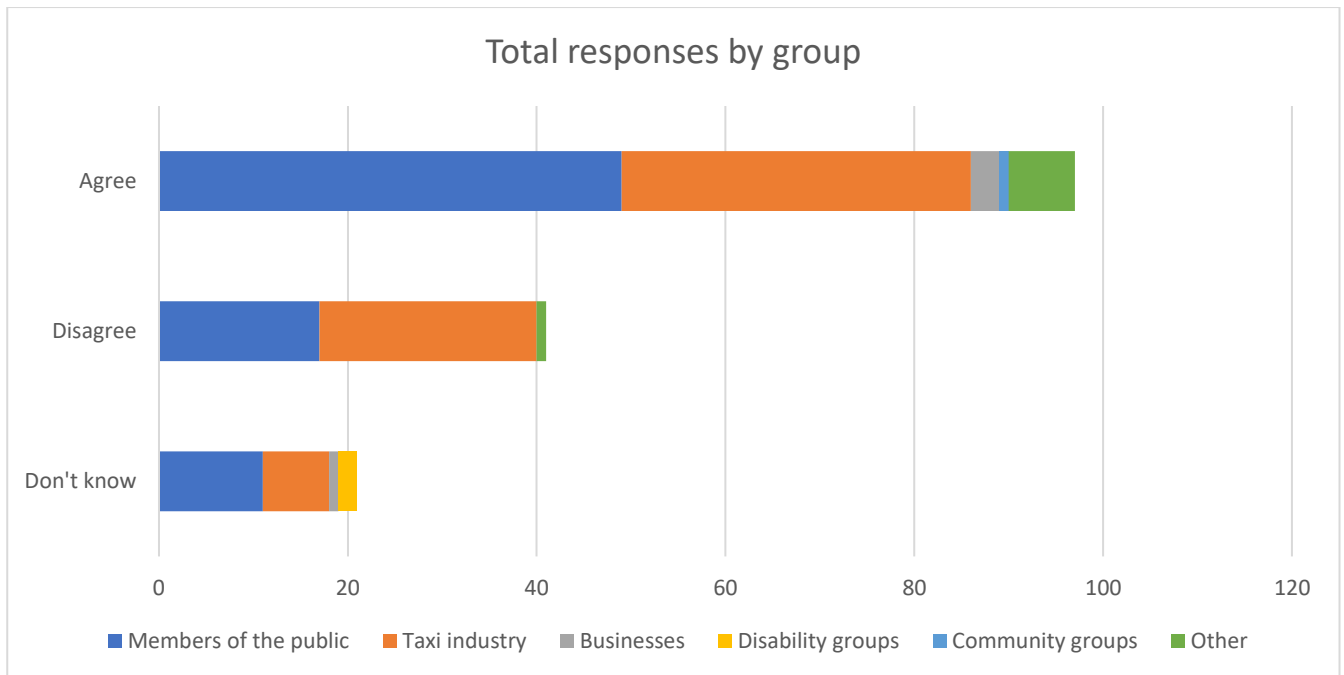
Comments – Agree	Frequency of inclusion
Good idea	13
More coverage or flexibility for service	13
Overall better service	8
One council, one zone	6
More lucrative for drivers	2
No need for two zones	1
Get rid of black and yellow cabs	1
WAVs too big	1
Never any taxis in Bury, but many in Newmarket	1
Help to aid recovery following COVID-19	1
Better for disabled or mobility impaired passengers	1
Proposal not relevant to private hire drivers	1

31. 41 respondents disagreed with the proposal. 23 were members of the taxi industry, 17 members of the public and one was from the 'other' respondent group. This represented 34.3 per cent of all taxi respondents, 22 per cent of members of the public and 12.5 per cent of the 'other' respondent group. 30 respondents provided additional comment, the most frequent of which were expressions of concern around potential 'honeypotting'.

Comments – Disagree	Frequency of inclusion
Taxis will go to other areas – lead to loss of coverage or too much coverage ('honeypotting')	8
Service is satisfactory now	5
Already too many taxis	5
Drivers income will be affected	5
Can't base decisions on speculation or no trust in council decision-making	3
Not a good idea	3
Won't equal out WAV numbers or should deal with WAV issues in current zone A	3
Favours Bury St Edmunds over Newmarket	2
Better for mobility users	2
The zones better support SMEs in local areas	1
Large taxi firms will flood market	1
Will not benefit my area	1
If taxis are unlikely to travel to other zones, there is no benefit	1

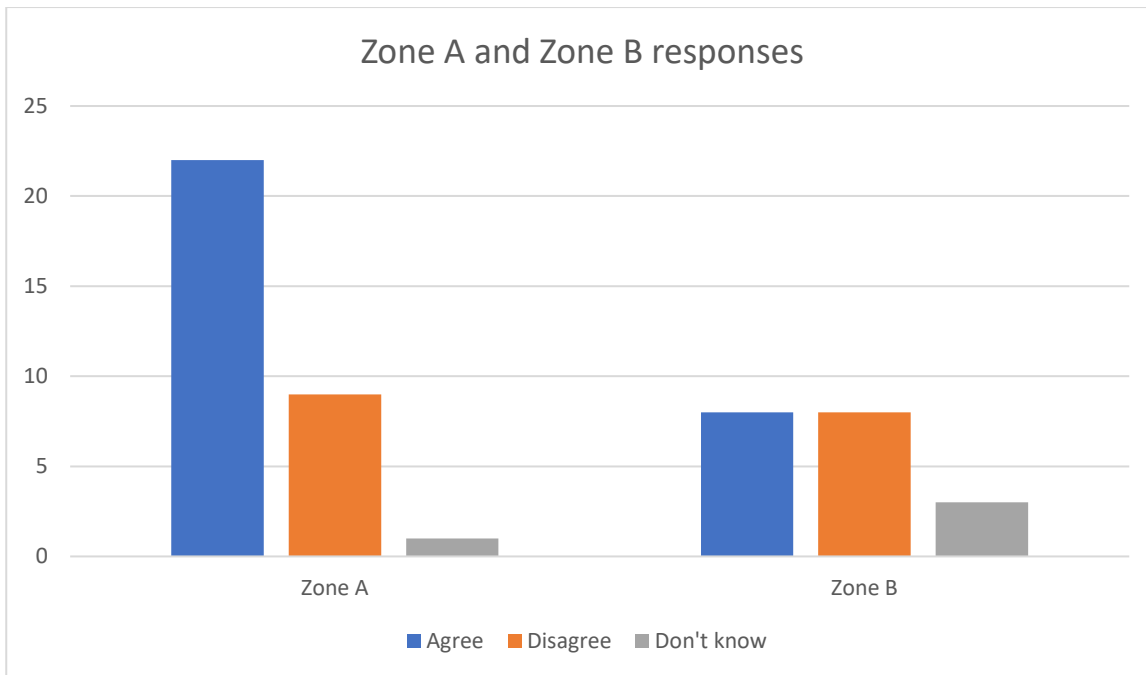
32. 21 respondents answered 'don't know' on the proposal. 11 were members of the public, seven members of the taxi industry, two were representatives of disability groups, and one was a business. Three comments were also provided.

Comments – Don't know	Frequency of inclusion
No confidence in council decision-making – will ignore the public	1
Taxis should not take up parking	1
Private hire drivers not affected	1

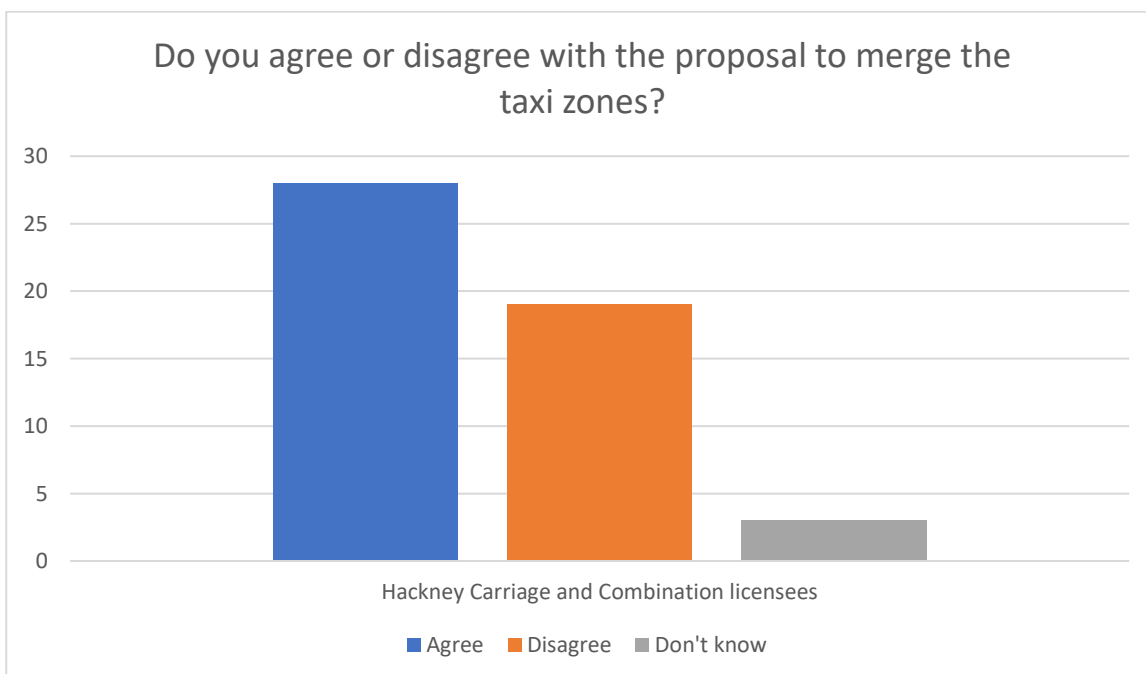


Zones proposal responses – further breakdown of taxi responses

33. Further analysis of taxi responses reveals additional details. When taxi respondents are broken down by location, broadly adhering to current Zone A (former Forest Heath) and Zone B (former St Edmundsbury), it shows that Zone A respondents were more supportive of the proposal than Zone B respondents. Of those that provided useful postcode information, 19 taxi respondents can be seen to reside in current Zone B, 32 in current Zone A (please note: this total includes the respondent that identified as a private hire driver but responded as a part of the 'Other' group, as well as two respondents that marked their location as CB2).
34. Of Zone B respondents, eight were in favour of the proposal to merge the zones. Eight disagreed with the proposal and three answered that they did not know. Conversely, of Zone A respondents, 22 were in favour of the proposal. Nine disagreed and one stated that they 'don't know'.

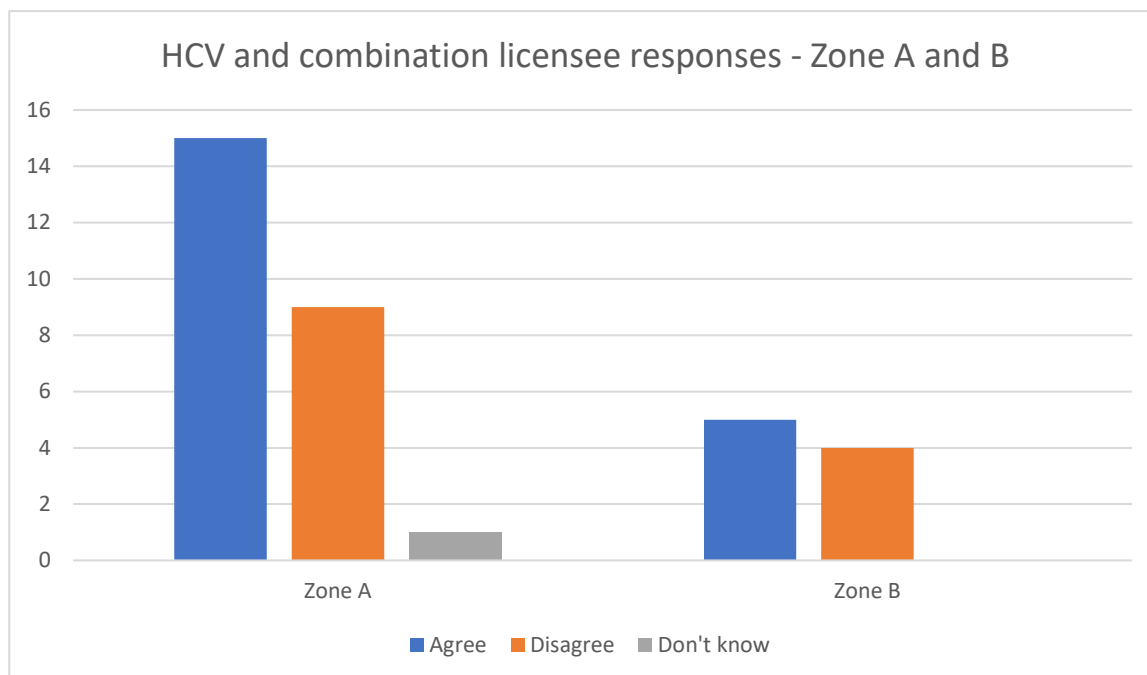


35. In addition, of the 51 members of the taxi industry that identified as hackney carriage drivers (either holding a hackney carriage licence or a combination licence - 28 hackney carriage licensees and 23 combination licensees), who would be most directly affected by the proposal, a majority were in favour. 28 (56 per cent) agreed with the proposal to merge the taxi zones; 19 (38 per cent) disagreed and three (6 per cent) responded that they did not know.



36. When only considering hackney carriage and combination licensees against the zone's information, it again shows that Zone A drivers are more in favour of the proposal to merge zones, but that more Zone B drivers agreed with the proposal than disagreed. Out of nine HCV and combination licensees that are located in Zone B, five agreed with the proposal and four disagreed. Of 25

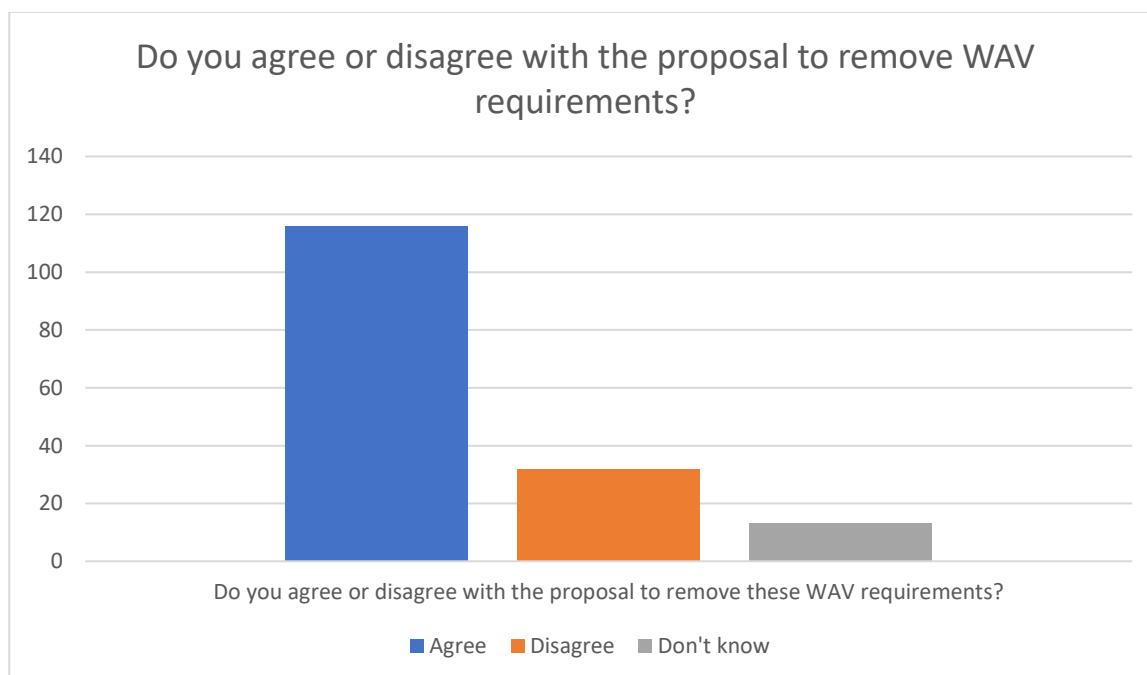
HCV and combination licensees located in Zone A, 15 agreed with the proposal, while nine disagreed and one respondent did not know.



Section 3: Questions 8 and 9

Proposal to remove WAV requirement

37. Questions 8 and 9 seek to gauge whether there is agreement to the proposal to remove the WAV requirement. Of 161 responses, 116 (72.1 per cent) were in favour of the proposal. 32 (20 per cent) disagreed with the proposal and 13 (8.1 per cent) answered that they don't know.



38. Of the 116 respondents that agreed with the proposal, 55 were members of the public, 48 were members of the taxi industry, three were businesses, as well as one community group and all eight respondents from the 'other' group. Among respondent groups, agreement with the proposal was generally high – 71.4 per cent of members of the public, 70.6 per cent of the taxi industry, 75 per cent of businesses and 100 per cent of community groups and the 'other' group respondents.
39. 63 respondents provided additional comment. Of that, the most frequent reason given was that WAVs are not suitable for all passengers or passengers with disability or mobility issues.

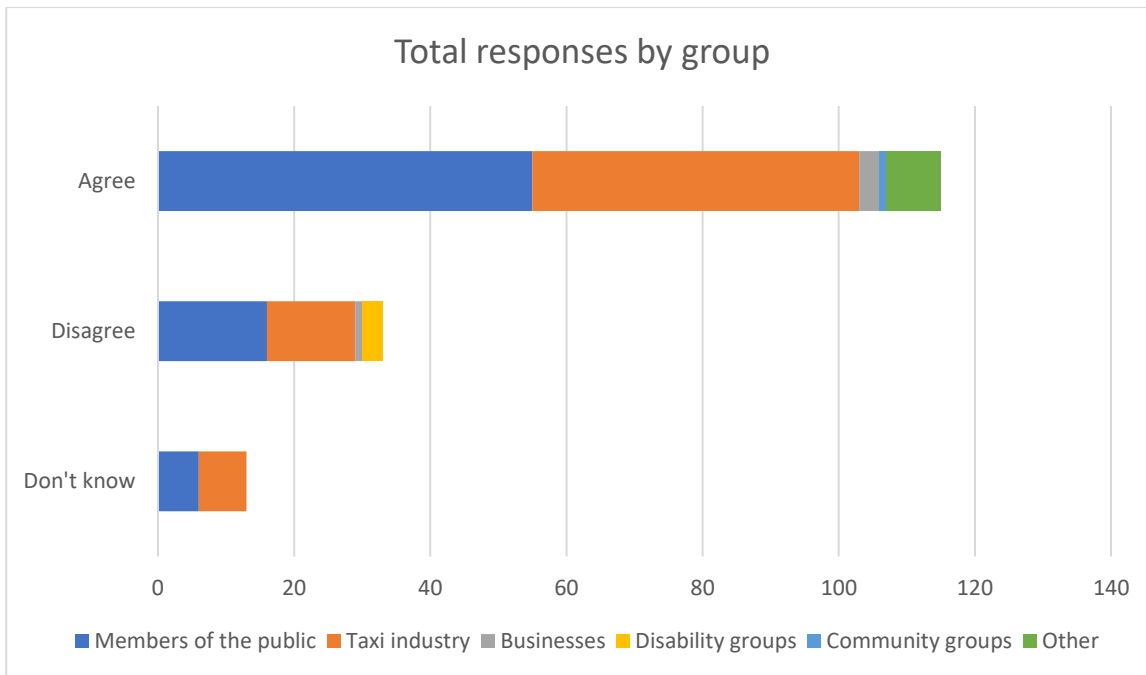
Comments - Agree	Frequency of inclusion
WAV not suitable for all	32
Limited demand for WAV or customers prefer saloon vehicles	9
Provision is currently good or too many WAVs	9
WAVs are expensive	8
Should be the choice of the customer	5
Balance is needed	4
Not necessary for all vehicles to be WAV	4
Council should monitor WAVs to maintain current levels	3
Opportunity for more flexible service or better despatch service would be more beneficial	2
Should be left to the market	2
Taxi companies and hackney drivers not doing enough to help the public or other drivers	1
A safe service should be available to all	1
No good EV or hybrid WAV options yet	1
WAV take up a lot of room	1

40. 32 respondents disagreed with the proposal. 16 were members of the public, 13 members of the taxi industry, two representatives of disability groups and one respondent representing a business. 20 of the 32 respondents that disagreed with the proposal provided a free text response to explain their answer. The most frequent response was that it would result in too many cars on a rank or affect the taxi industry negatively.

Comments - Agree	Frequency of inclusion
Will cause too many cars on rank or will impact taxi industry negatively	6
No need to change	5
WAV availability is important	4
Will result in WAV shortages	3
Balance is needed	2
More WAVs needed	2
Larger firms should allow WAV pre-booking	1
Discrimination against disabled people	1
WAVs should only be allowed between zones if there are shortages	1
Too expensive	1
More small WAVs will solve mobility issue	1
Should be a limit on both WAV and Saloon	1

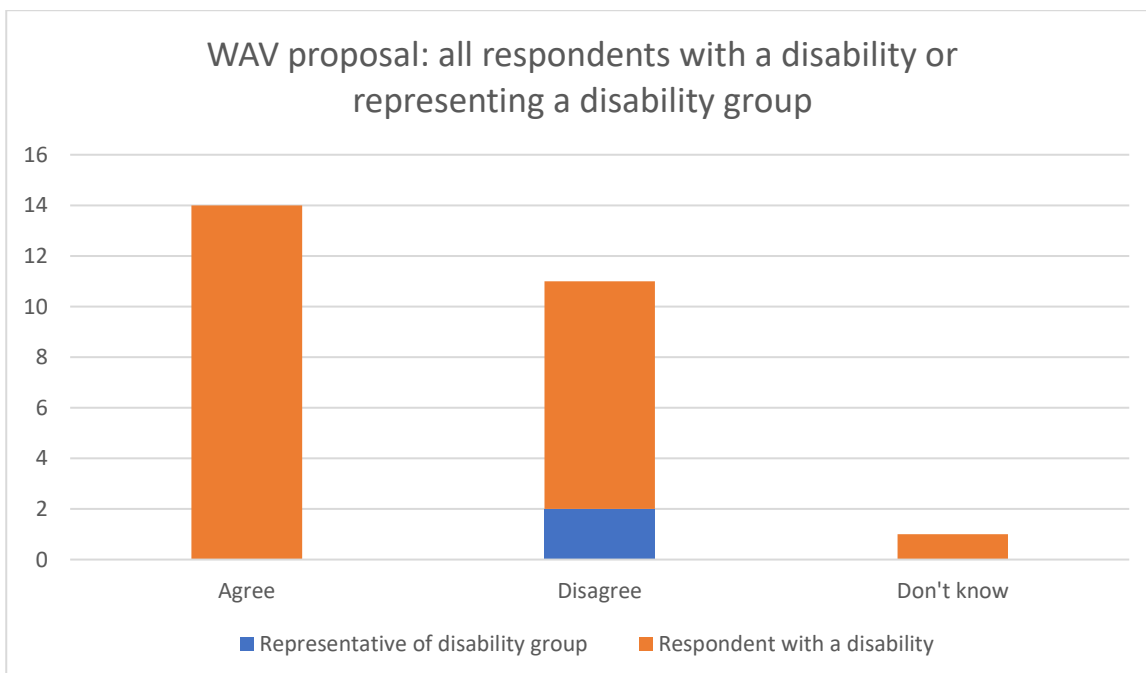
41. 13 respondents answered 'don't know' to the proposal. Of that number, seven were members of the taxi industry and six were members of the public. Three comments were provided to support this answer.

Comments - Don't know	Frequency of inclusion
Makes no difference or no trust in council decision-making	1
Hopefully won't affect WAV availability	1
Approach taken is not satisfactory	1
Confusing	1



WAV proposal responses – all respondents with a disability

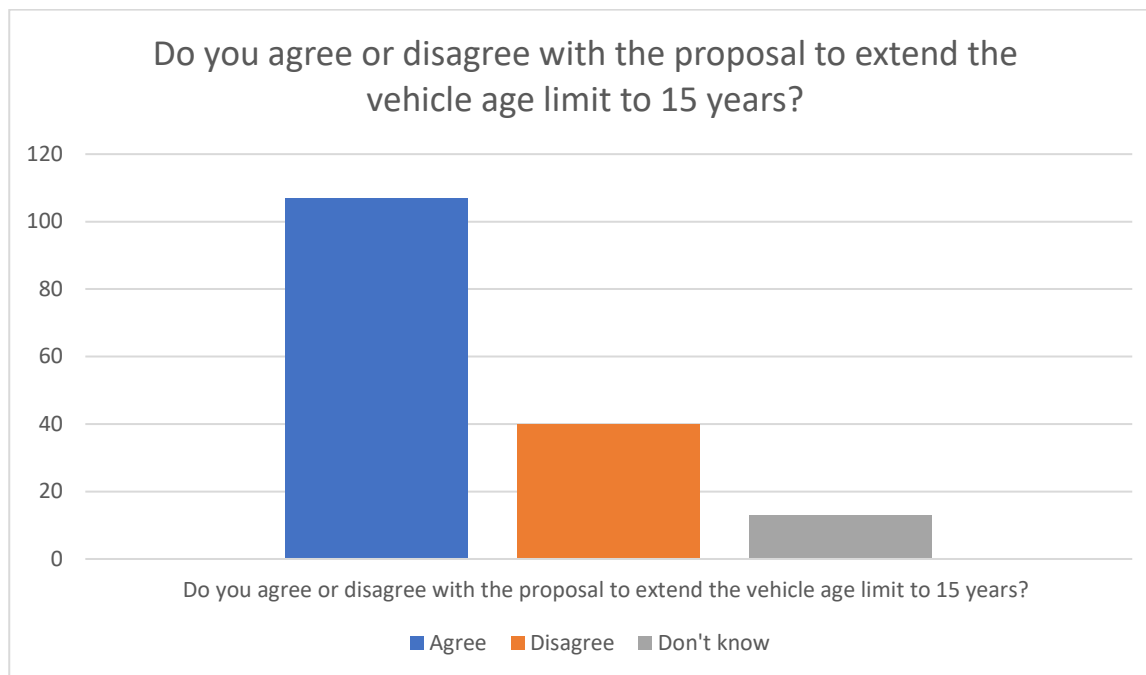
42. It is most noteworthy that both disability group respondents disagreed with the proposal. However, further analysis of the 24 respondents with a disability who answered this question (but predominantly answered as members of the public), show that a majority were in favour of the proposal – 14 (58.3 per cent) agreed; nine (37.5 per cent) disagreed; one (4.1 per cent) stated don't know.



Section 4: Questions 10 and 11

Proposal to extend the age limit to 15 years

43. Questions 10 and 11 seek to measure whether there is agreement to the proposal to increase the maximum vehicle age limit to 15 years old. Of 160 respondents, 107 (66.9 per cent) agreed to the proposal to extend the vehicle age limit. 40 (25 per cent) answered that they disagree and 13 (8.1 per cent) responded that they did not know.



44. Of the 107 respondents that agreed to the proposal, 55 were members of the taxi trade, 37 were members of the public, three were businesses, two were representatives of disability groups, one representative of community groups and eight from the 'other' respondent group.
45. All groups were generally in favour of this proposal and agreement was mostly high. 75 per cent and 82.1 per cent of businesses and the taxi trade respectively were in favour, as well as 100 per cent of disability and community groups and the 'other' respondent group. However, only 48.1 per cent of members of the public who responded were in favour with this proposal.
46. These figures are supported by 50 respondents providing a free text explanation for their answers. The most frequent reason given for agreeing with the proposal was that the taxi industry is experiencing financial issues and this option was more affordable.

Comments - Agree	Frequency of inclusion
Financial issues for the taxi industry or more affordable	20
Condition matters more than age of vehicle	12
This will allow the taxi industry time to recover from COVID-19	9
Vehicles are checked annually, or MOTs are thorough	6
Agree with proposal	4
Electric vehicles should be considered in the future or are not yet viable alternatives	3
Review in 2025 helps to ease concerns of issues	2
10 years is not long enough to get value from car	2
Proposal should be for WAVs only	1
Should be temporary measure	1
15-year age limit will still ensure that most polluting vehicles are not used	1
There should be dispensation for electric vehicles purchased under five years old	1
Should consider electric vehicles	1
Age of replacement vehicles should also be extended from five to eight years old	1
Should be extended further – beyond 15 years old	1
Should have spot checks for drivers who don't look after their vehicle	1
Will lose drivers if required to replace at 10 years old	1
Nice to renew vehicle	1

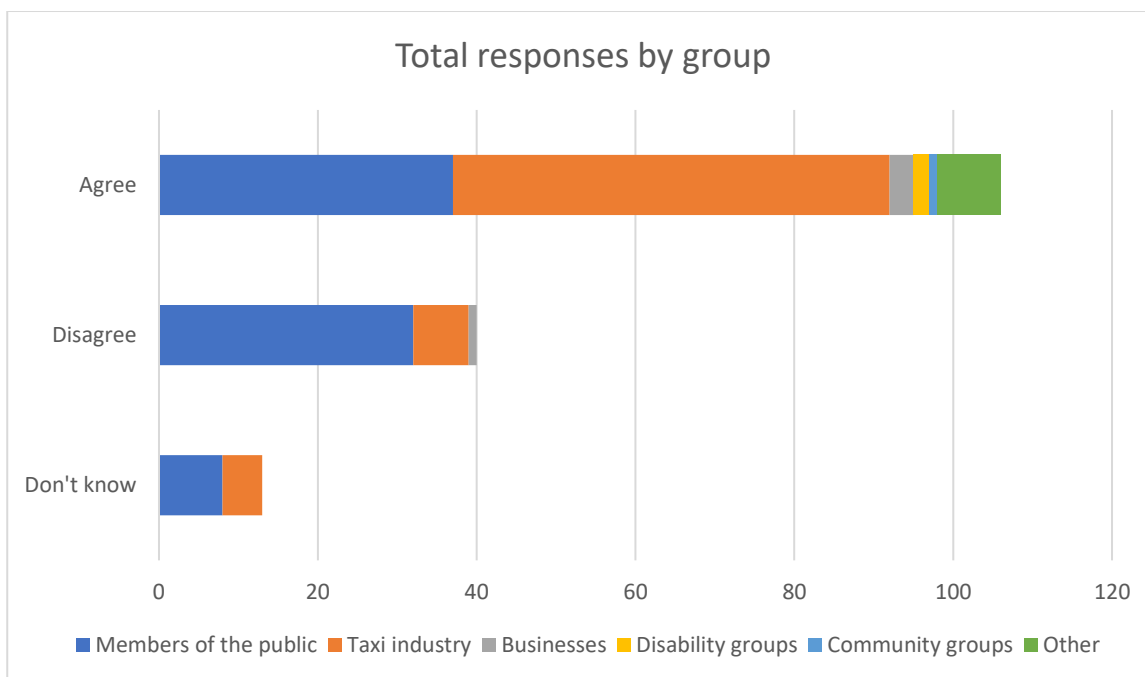
47. Of the 40 respondents who disagreed with the proposal, 32 were members of the public, seven were members of the taxi industry and one was a business. Opposition to the proposal was most pronounced from members of the public, with 41.6 per cent of that respondent group disagreeing – for businesses and the taxi trade, those who disagreed were a far lower proportion at 25 per cent and 10.5 per cent respectively.

48. 29 comments were also provided to support respondents' answers. The most frequent reasons given were that extending the vehicle age limit would be worse for the environment, or that it was generally better to keep the age limit at 10 years old.

Comments - Disagree	Frequency of inclusion
Worse for the environment	6
Should stay at 10-years	6
Taxis need upgrading or taxi quality is poor	4
15 years age limit is too old	3
Condition and MOT are more important than age	3
Risk to vulnerable people (including through increased carbon emissions and poor taxi quality)	2
Newer vehicles look better	2
Safety should be compromised to ensure service is good	1
Safer	1
Should reduce age limit further	1
Newer cars are more reliable	1
Lower emission taxis help to introduce EVs to the public	1
Should be requirement to transition to EV	1
Cars last longer	1
Financially sound for taxi industry to replace cars at 10-year age limit	1
Should be 20 years	1
Cost issues for drivers	1

49. 13 respondents answered 'Don't know' to the proposal. Of this number, eight were members of the public and five were members of the taxi industry. Two respondents provided comments to explain their answers.

Comments – Don't know	Frequency of inclusion
10-to-15-year age limit is good	1
Various issues with conditions and noise from taxis	1



Section 5: Question 12

Any further comments or alternative approaches

50. Question 12 focused on gathering any other comments or possible alternative suggestions from respondents. 75 respondents provided free text answers to this question, which can be broken down into alternative or supplementary suggestions, and general comments to the council. Of the 75 responses, 29 can be regarded as alternative or supplementary suggestions for the taxi policy, with 46 considered as general comments.
51. Under alternative suggestions, the most frequent responses were to not make any changes to the current policy or to protect certain transfer rights for hackney carriage vehicles.

Alternative suggestions	Frequency of inclusion
Don't make any changes	6
Protect HCV transfer rights	6
WAV changes a mistake or don't change WAV requirement	5
More checks on taxi vehicles to ensure quality	2
Raise taxi fares	2
Council should develop schemes to or have requirements to encourage more EV	2
Should consider Ultra Low Emission Zone (ULEZ)	1
Institute a licensing cap	1
Allow new plates on new cars only	1
Should leave new policy in place to allow to bed in	1
EVs are not viable	1
Develop a rank at Angel Hill	1
Place a requirement on miles to the gallon, rather than age	1
Licence certain vehicles for school transport only	1
Taxi drivers shouldn't smoke in vehicles	1
Don't merge zones	1
WAVs should have assistants to provide additional help	1
Reduce taxi ranks in Newmarket	1
Council needs to further define WAV performance requirements	1
Council should consider second-hand EV	1
Council should bring back black and yellow cabs	1
Develop a taxi rank in Haverhill	1
Install more charging points	1
All new registered taxis should be hybrid	1
Age limit could negatively impact larger WAVs (that hold two or more wheelchairs). These vehicles are necessary to take disabled children to school. Council should adjust policy to ensure these WAVs are viable regardless of age	1

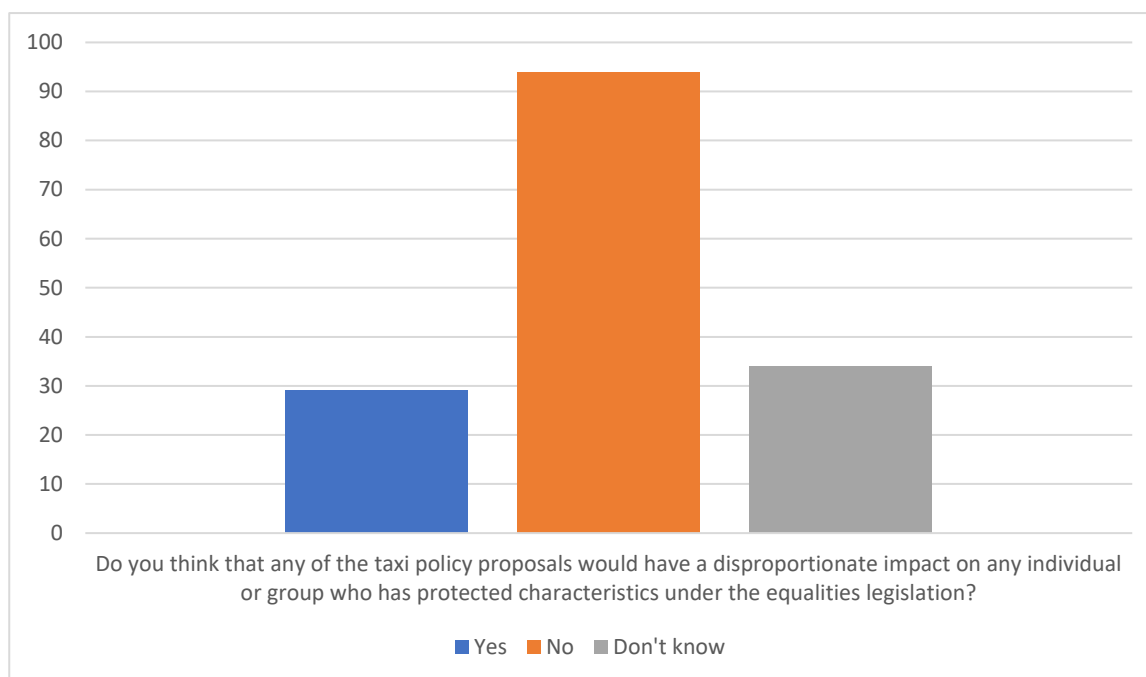
52. Under general comments, the most frequent substantive comment was that the proposals made by the council were sensible.

General comments	Frequency of inclusion
No or no further comment	11
Proposals are sensible	7
Criticism of council decision-making	6
Council should support taxis – will rob taxi jobs	5
Support WAV proposal	4
Difficulties getting taxis in Bury and Newmarket	3
Taxi drivers are intimidating council	2
Taxi drivers are poor quality	2
There should be a mixed fleet	1
Council should help Newmarket	1
Council should lower car park charges	1
Hackney carriage vehicles offer better customer service	1
There should be more investment in buses	1
There should be a park and ride for Bury St Edmunds	1
Happy with older vehicles	1
Council needs to look at the accessibility of towns	1
Taxi drivers hours a concern – safety issue	1
More control of taxis needed – killing businesses	1
Proposals will provide respite for taxi industry following pandemic	1
Taxis should not idle engines	1
Council staff should get back to the office	1
Too many regulations	1
Taxi industry not sufficiently engaged	1
Consultation video is brilliant	1

Section 6: Equalities impact – Questions 13

53. Respondents were asked an additional question around equalities impact. 29 out of 157 respondents (18.5 per cent) answered that they did think the Taxi

policy proposals had a disproportionate impact on an individual or group under the equalities legislation.



54. There were 36 free text responses to this question, which can be divided between issues that can be considered under the Equalities Act and other issues. The most frequent equalities issues mentioned was that the change to WAV policy could negatively affect wheelchair users.

Equalities issues	Frequency of inclusion
WAV change would disproportionately affect disabled people or wheelchair users	8
If do not remove WAV requirement, elderly or people with mobility issues will be negatively impacted	7
Will lead to fewer taxis or unmet demand	3
None or changes are fair	3
Should encourage more WAV numbers	1

55. For the comments that can not be considered under the Equalities Act, the most frequent comment was that there are already enough taxis to meet demand or that the industry had flexibility to provide the appropriate kind of taxi when booked.

General comments	Frequency of inclusion
Enough taxis or appropriate vehicles can be booked	2
Don't know or don't care	2
The council is making lives worse	1
Policies will impact drivers' ability to change to from WAV to saloon	1
Taxi industry is currently hurting businesses in Bury St Edmunds	1
Not reducing emissions will impact all	1
WAV cars impact drivers financially	1
Not practice enforcing policy	1
The council pays men less than women	1
Policies will allow the market demand to dictate supply	1

Conclusion

56. During the eight-week consultation period, the responses received to the consultation were generally in favour of all three proposals. In addition, there was no significant split in opinion between different groups, with a larger proportion from all except one respondent grouping being in favour of each proposal.
57. However, a lower proportion of members of the taxi industry supported the proposal to merge the zones, and further investigation suggests that fewer drivers from current Zone B are supportive in comparison to Zone A respondents. Members of the public were also less supportive of the proposal to extend the maximum age of vehicle requirement – while a larger proportion agreed with the proposal, this was not a majority – most frequently citing environmental concerns.
58. In addition, both respondents representing disability groups disagreed with the proposal to remove the WAV requirement. Further investigation shows that of all respondents with a disability, a majority were in favour of the proposal. Nevertheless, this issue should be taken into consideration going forward.
59. Although the results of the survey suggest there is overall support for the proposals, the caveats described above would suggest there is a need for further engagement with:
- The taxi industry, especially Zone B drivers, on merging zones
 - Disability groups regarding the WAV policy, as well as the issues disabled passengers can experience with WAV vehicles

- Members of the public on the wider work the council is undertaking to reduce carbon emissions across the district, as well as the vision for a green taxi fleet by 2030.