

# **West Suffolk Taxi Driver and Operator Forum**

West Suffolk House

6 January 2025

10.30am to 12pm

- Opportunity to ask questions at the end of each section.
- Please keep questions relevant to section.
- Licensing officers will be available if you have a question which isn't covered by the agenda, time permitting.
- Please contact [licensing@westsuffolk.gov.uk](mailto:licensing@westsuffolk.gov.uk) if there are areas you'd like featured in future.

# Running order

- West Suffolk approved garages (December 2024 – January 2025)
- Vehicle age requirements (April 2025)
- Taxi and private hire vehicle (PHV) best practice guidance (November 2023)
  
- Review of taxi and PHV policy (2025)
- Review of fees and charges (2025)
- Digital applications (2025)
  
- Unmet demand survey (Summer 2024 – February 2025)
  - Current fleet – cap or no cap
  - Wheelchair accessible vehicle provision
  - Recommendations for trade and licensing authority
- Future forum sessions (2025)

# **West Suffolk approved garages**

# Approved testing garages

## Detailed on West Suffolk Licensing webpages

- Forestford Garage – Mildenhall
- West Suffolk Depot – Bury St Edmunds
  
- Bury Motor Company – Bury St Edmunds (from today)
- Thurlow Garage – Thurlow (from today)
- Wests Group (Newmarket) Ltd – Exning (from today)

## Changes

- First aid kit and fire extinguisher no longer checked during test.

# **Review of approved garages**

## **Why did we review approved garages?**

- Engagement with currently approved garages
- Simplify the testing forms
- Development and reintroduction of testing guidance document
- Revision of the process to put more responsibility on the garage
- Review maximum fees that could be charged
- Bring inline with the council's system for handling contracts

# Revised process for plate tests

## Responsibilities

### Garages

- The inspection forms have been revised and simplified to streamline the process.
- Garages must provide inspection assessment as a single PDF document to the applicant.
- Sent to the email address provided by the applicant at assessment.

### Drivers

- The applicant must send this to licensing with their application (first grant or re-licence).
- Six-monthly tests (mid-term) must be sent through to licensing within 48 hours.

# Revised process for plate tests

## Charges

- The maximum charges have been revised to better reflect inflationary increases since costs were last looked at in 2021.

Type of test	Previous maximum	Revised maximum
Initial or six-monthly test	£65	<b>£80</b>
Re-test	£35	<b>£50</b>
Failure to keep an appointment	£20 (unless 24 hours notice is given)	<b>£30 (unless 24 hours notice is given)</b>
Trailer test	£30	<b>£40</b>

Please note: These charges are not subject to VAT as a taxi test is classed as non-business when booked and paid for by a driver or an operator.



# Approved garages

Questions?

# Vehicle age requirements

# Change to vehicle age requirements

## From April 2025

- 15-year age requirement for vehicles comes into effect
- Five-year age requirement for new vehicles remains
- Checked at licence or re-licence stage

# Extracts from cabinet minutes

## Announced in July 2022

- Changes to remove the requirement for WAVs.
- Allow more time to consider and develop plans to achieve an accessible, safe, green and thriving fleet.
- Setting the maximum age of vehicles to 15 years will remove those emitting the highest carbon emissions from the roads in 2025.
- All vehicles will be required to undertake a twice-yearly safety check, ensuring that they continue to be roadworthy and safe.

## Current policy wording

- “From 2025 vehicles must be no older than 15 years, except electric or zero emission vehicles for which there is no maximum age”.

# Vehicle age requirements?

**Questions?**

# **Best practice guidance**

# November 2023 update

An update to the 2010 best practice guidance

Consultation in 2022

Available at [www.gov.uk/government/publications/taxi-and-private-hire-vehicle-licensing-best-practice-guidance](https://www.gov.uk/government/publications/taxi-and-private-hire-vehicle-licensing-best-practice-guidance)

60 pages: 15 chapters: additional material

# Expectations on licensing authority

- Licensing authority must implement the national statutory **taxi and private hire vehicle standards**.
- Licensing authority is expected to **consider the taxi and private hire vehicle best practice guidance for licensing authorities (BPG)**.
- In practice the authority should seek to meet BPG unless there are local issues to justify a more lenient or stricter standard.



# Terminology

- Vehicles licensed under section 37 of the Town Police Clauses Act 1847 are referred to in that legislation as 'hackney carriages'.
- In more recent legislation the term 'taxi' is used.
- The BPG uses the term 'taxi' to mean vehicles licensed under the above acts.
- It does not include private hire vehicles.

# Greater distinction between taxis and private hire vehicles

- Private hire vehicles includes executive cars, chauffeur services, limousines and some school and day center transport services.
- One of the overarching aims of the guidance is to provide greater distinction between taxis and private hire vehicles so that the public is increasingly aware of this.
- Licensing authorities should adopt this approach in its communications.

# Link to policy review

- Taxi and private hire vehicle policy review scheduled for 2025.
- As part of the review authority will consider BPG in full.
- Future forums will pick up on sections of the guidance that differs from current policy.
- Aim to lead to early engagement around policy development.

# **Best practice guidance**

**Questions?**

# **Taxi and private hire vehicle policy**

# Policy development

Local priorities

## To deliver:

- a safe fleet
- an accessible fleet
- a green fleet
- a thriving fleet

Consider directly raised and historic concerns.

Consider trends from engagement for example surveys or similar:

- trade
- public
- stakeholders

# Policy development

## Key documents to consider

- Best practice guidance
- Determination requirements
- Statutory guidance
- Other documents

# Policy development

## Role of licensing authorities

- Primary objective to protect the public.
- Ensure services are accessible and affordable.
- Regulation should protect equality and enable fair competition.
- Consider whether any policy changes would have unintended negative consequences that might outweigh the benefits of that policy.



# Policy development

## How will we get there?

- Review current policy in light of national developments (for example BPG).
- Research recent policy developments of other local authorities.
- Review survey findings undertaken earlier this year.
- Consult with neighbouring licensing authorities.
- Model potential changes and impact on current fleet.
- Consult with trade on possible measures.
- Consult with legal services on potential changes.
- Revise policy.
- Survey public and trade on proposed changes.
- Further revisions made.
- Draft goes to Cabinet for approval and/or amendments.
- If adopted changes communicated to the trade alongside timescale
- Changes come into effect.

# **Taxi and private hire vehicle policy**

**Questions?**

# **Fees and charges**

# What process do we need to follow?

## Frequency

- Licensing fees are reviewed every three years.
- Fees to be reviewed during 2025 – to come into effect from April 2026.
- The licensing model is intended to be self-funding through licensing fees.
- Ensure that the council recovers the costs associated with the grant of any vehicle licences or combined driver's licences.
- Follows an agreed process in line with West Suffolk Council Fees and Charges Policy and legislative requirements

# More details

## Calculating fees and charges

Licensing work with Finance to:

- consider how much time is spent on each licence type
- calculate how much this equates to on average
- this means that the charges reflect the actual resources being used for each licence type
- review against the fees of neighbouring authorities.

## Consultation

- The purpose is not to ask whether the trade are for or against an increase.
- Opportunity to inspect the fees and raise objections if feel they do not comply with legislative requirements, or if there are incorrect calculations.

# **Fees and charges**

**Questions?**

# Digital applications

# What are we aiming for?

- For taxi-related applications to be fully digital.
- We are working on a form which will ask you to upload documents as you go through the application.
- The form won't let you move on until you have either ticked a box or uploaded a document.
- This should mean more right-first-time applications and less rejected applications.



# Combined driver's licence application form (badge)

Customer Details **0**

DBS

Declarations and Guidance

Payments

Summary

Title

Mr. ✓

First name \*

John ✓

Last name \*

Smith ✓

Phone number \*

01284 123456 ✓

Alternative number

Email address \*

john.smith@westsuffolk.gov.uk ✓

National Insurance Number \*

NH123456A ✓

National Insurance Number \*

NH123456A ✓

Please search for your address by entering your postcode below.

Please enter your postcode \*

IP33 3YU ✓

Please select your address from the list \*

West Suffolk House Western Way , Bury St Edmunds ✓

**Selected address:**

West Suffolk House  
Western Way  
Bury St Edmunds  
Suffolk  
IP33 3YU

Are you applying for a new licence or re-licence? \*

New Licence

Re Licence

Are you applying for a one or three year period? \*

One Year £174.00

Three Year £308.00

Please click 'Next' once you have completed all the required fields.

# Digital applications

**Questions?**

# Unmet demand survey

# Commitment to undertake an unmet demand survey

In 2024 the council commissioned a third party (LVSA) to review:

- the effect of merging the two travel zones
- the effect on removing the requirement for new taxis to be wheelchair accessible vehicles
- whether it was appropriate to apply a limit on the number of taxi licences.

As part of this work the following took place:

- Consultation through four surveys during the summer and early autumn.
- Undertook rank survey work.
- A total of 225 responses were received for the combined public survey.
- 63 responses were received from the trade survey.
- 3 responses from the operator survey.
- 36 responses from the stakeholder survey.

Report summary findings:

“There appear to be sufficient vehicles to meet rank needs, although there are reports of detailed gaps in service, and also in respect to meeting specific needs of those with disabilities. One company was found that had a key focus on serving customers with mobility and other specialist needs although this company also covered other licensing areas”.

# Unmet demand survey - Report recommendations

“There is no evidence of any unmet demand for the services of hackney carriages that is overall significant. On the contrary, the level of observed hackney carriage demand at ranks could clearly be serviced by a much smaller fleet were vehicles only providing rank and hail.”

“There is no legitimate requirement that hackney carriages only service ranks and it is also clear they undertake a wide range of bookings, contracts, app service meeting a wide range of need across the full area. We do not consider it would be appropriate at this time to set either a limit at the current level of hackney carriage vehicles, nor one lower given that market forces should prevail.”

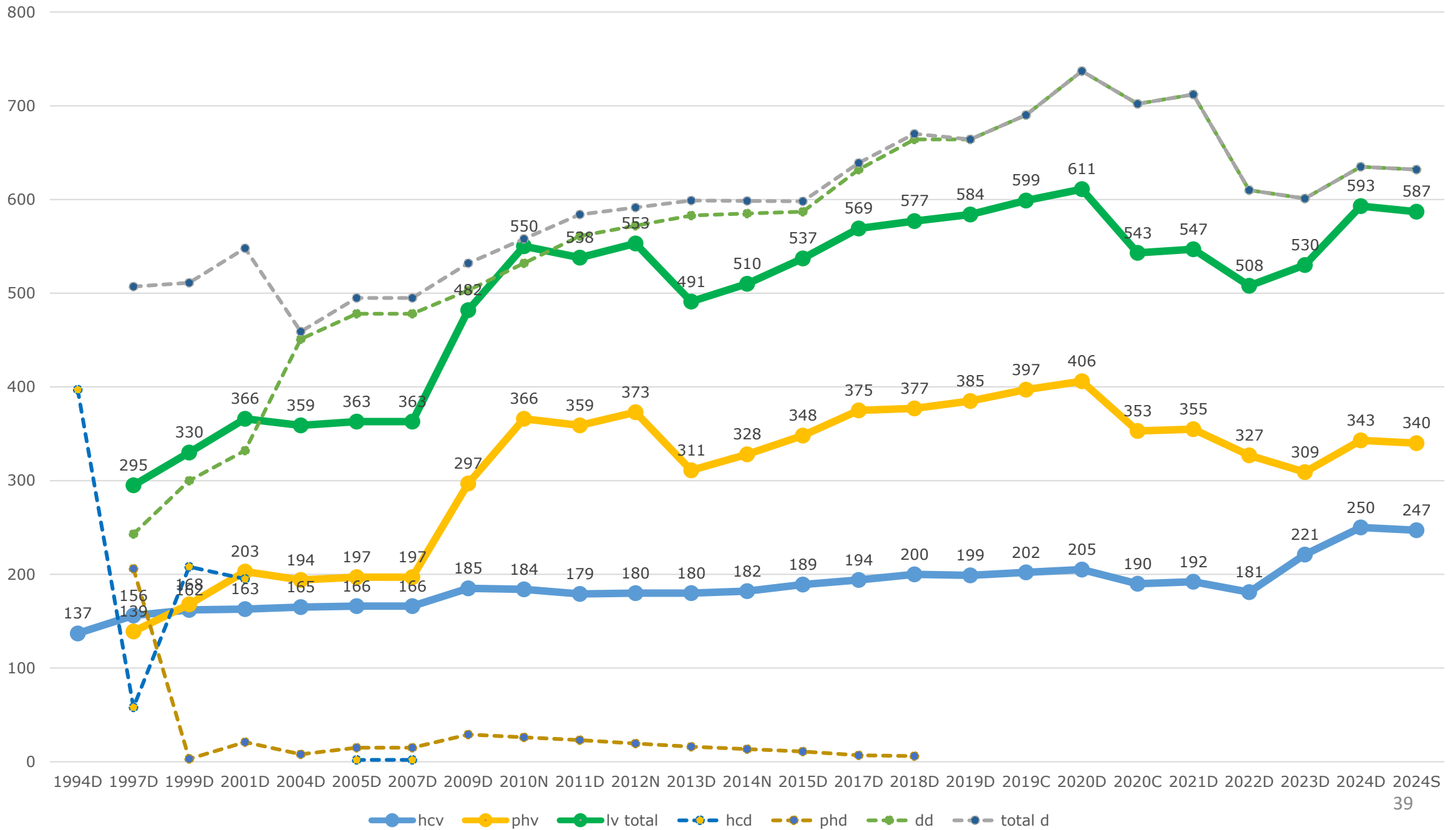
“In respect of if existing hackney carriage vehicles are accessible to all who wish to use them, this does appear to be the case. Further wheelchair users can and do use the services of the existing fleet both at ranks and by contacting vehicles by phone. However, given the high level of private hire WAV style vehicles this broadens demand and should be encouraged.”

# Licensed taxi numbers

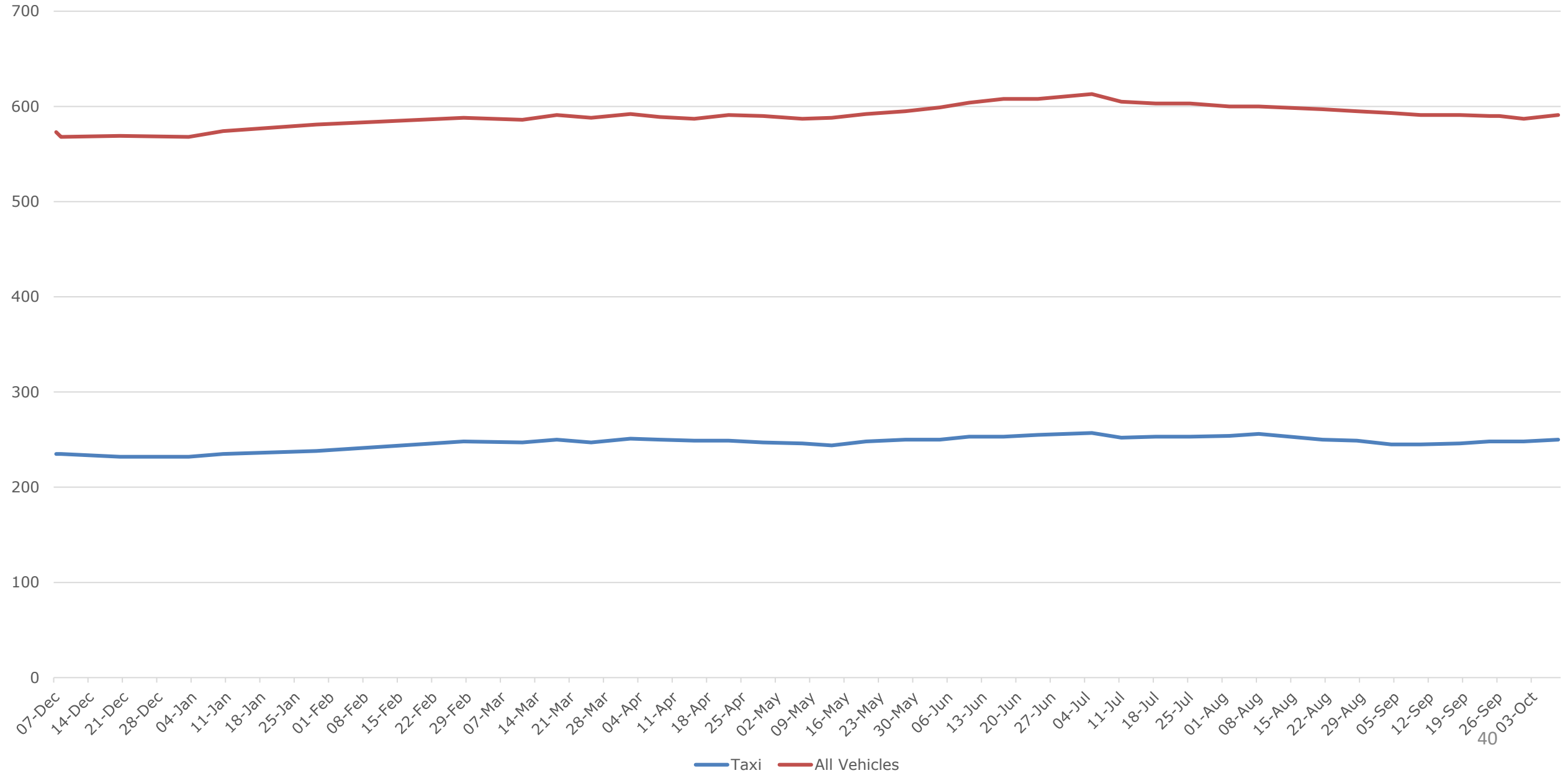
## Unmet demand survey looked into whether a limit on number of taxis could be justified

- Since removal of WAV requirement numbers increased from 181 (2022) to a maximum of 257 (2024)
- Since April 2024 the number of licensed taxis has remained constant at around 250-260

# West Suffolk licensed vehicles and drivers

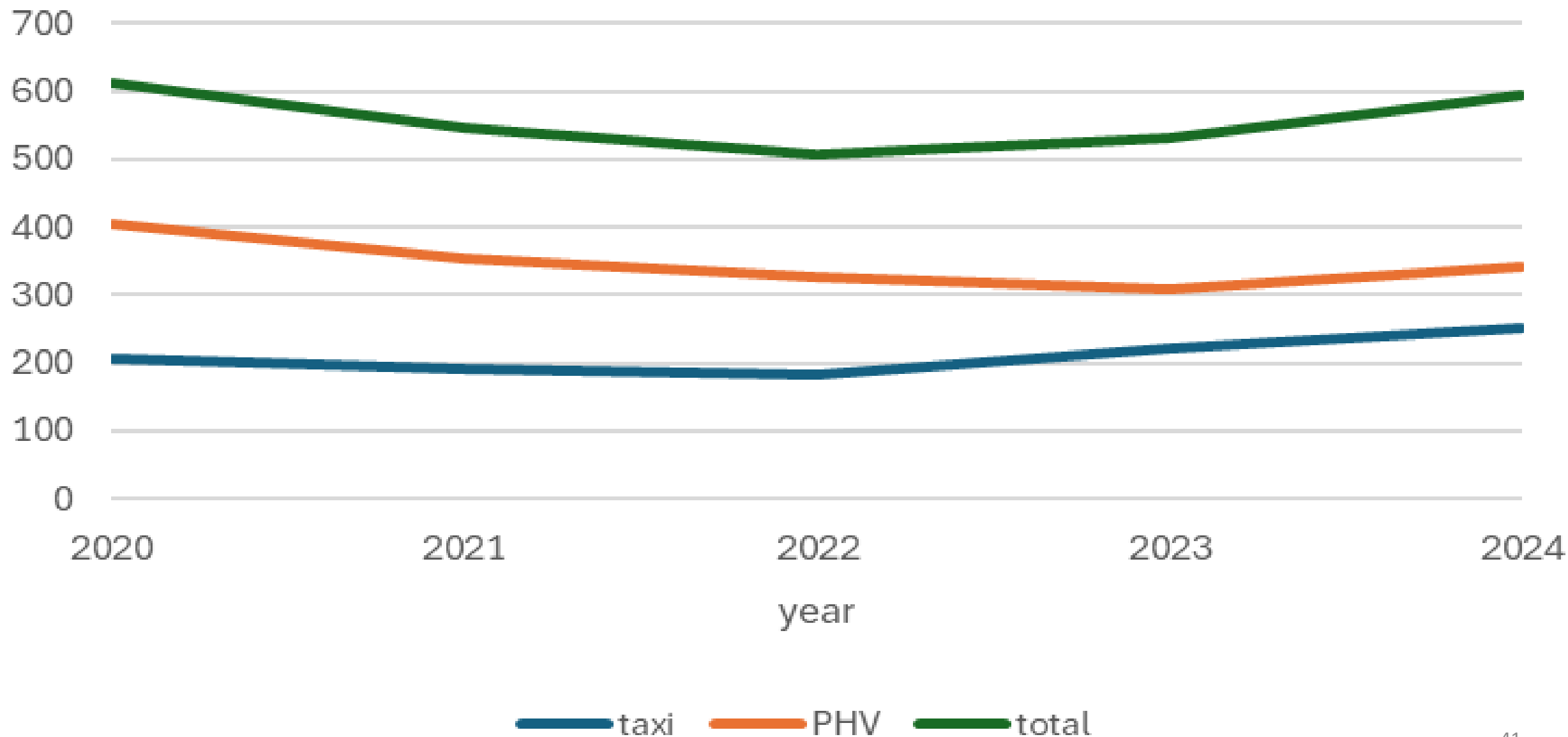


# Taxi v All licensed vehicles Dec 2023 - Oct 2024





'taxi', 'PHV', 'total' by 'year'

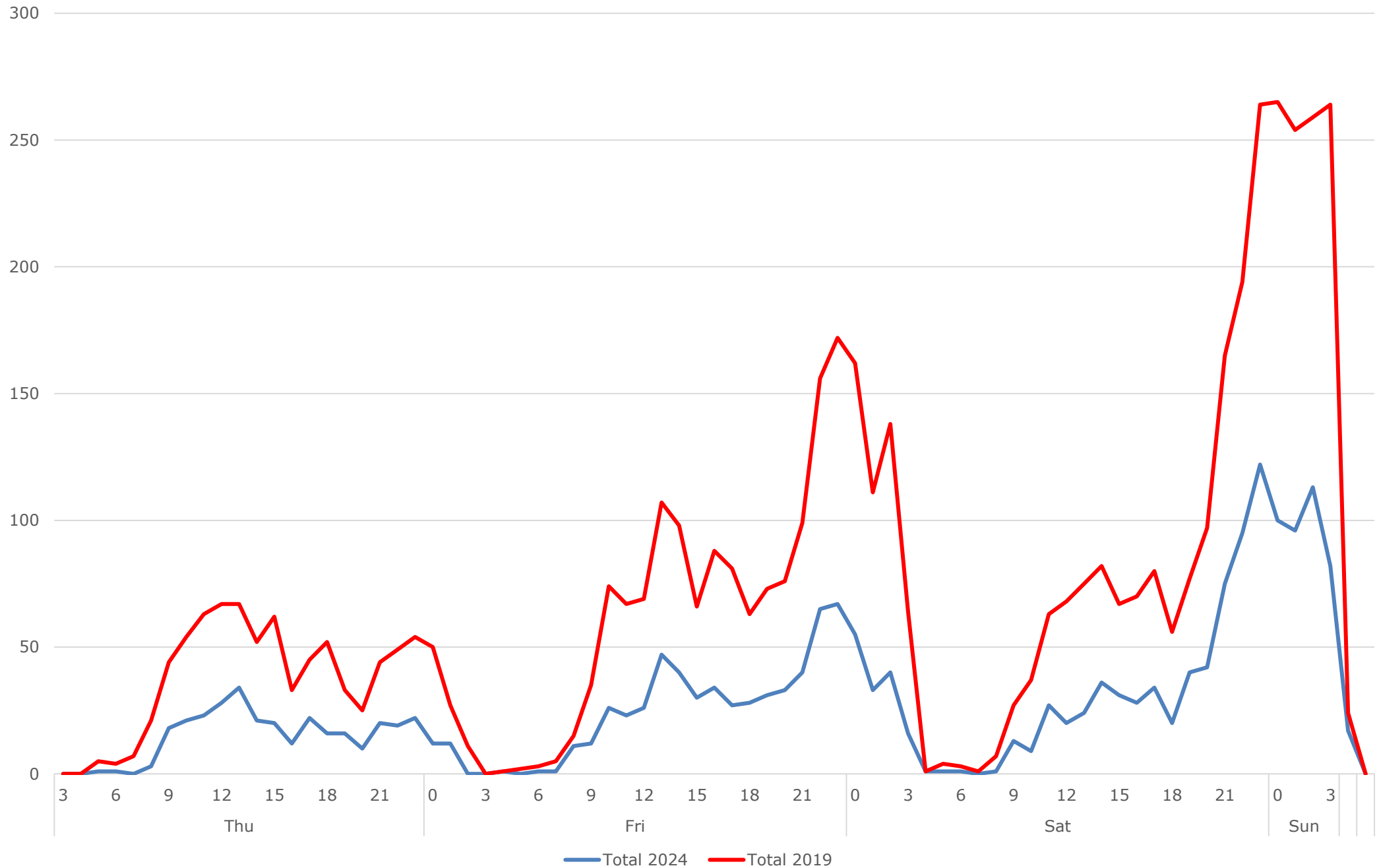


# **Unmet demand survey rank observations**

# Rank findings – weekly passenger numbers and share by rank

Year	2024		2019		2005
Rank	Passengers	%	Passengers	%	Passengers
Bury St Edmunds, Cornhill	1,455	43%	1,846	35%	1,900
Newmarket, High St, WHSmith	1,151	34%	2,332	44%	-
Newmarket, High St, White Hart	338	10%	395	7%	-
Bury St Edmunds, railway station	234	7%	303	6%	600
Mildenhall	146	4%	260	5%	-
Haverhill, Brook Service Rd	60	1.5%	71	1%	350
Bury St Edmunds, St Andrews Street	17	0.5%	92	2%	30
Newmarket, Fred Archer Way	0	0%	4	0%	-
Haverhill, Market St	0	0%	-	-	65
<b>Total</b>	<b>3,399</b>		<b>5,303</b>		

# Comparison of 2019 and 2024 total passenger flows



# Vehicle activity levels

- 124 different hackney carriage plates were observed and 18 private hire. This is half of the available hackney carriage fleet.
- In 2019, around 63% to 70% of available hackney carriage fleets were observed just within the Saturday later observations, suggesting a lower activity rate for vehicles at ranks in 2024.
- If the levels of demand observed at ranks estimated for a typical week are compared to the share of vehicles observed, there is very close correlation between levels of demand and levels of service. This shows a good appreciation of passenger requirements by the current hackney carriage vehicle trade.
- However, the plate observations only account for half the hackney carriage fleet available for service, although they are only a sample (albeit appearing to be a representative sample).
- This may suggest the national trend of reducing weekend activity by hackney carriages applies here.

# **Unmet demand survey driver survey findings**

# Main method of collecting fares

- 29% (33% in 2019) said their main method of getting fares was from the ranks.
- 29% (33%) from telephone bookings.
- 5% (2%) said from hailing.
- 18% (9%) said most work came from school contracts.
- A further 15% (9%) said they got most work from an app.

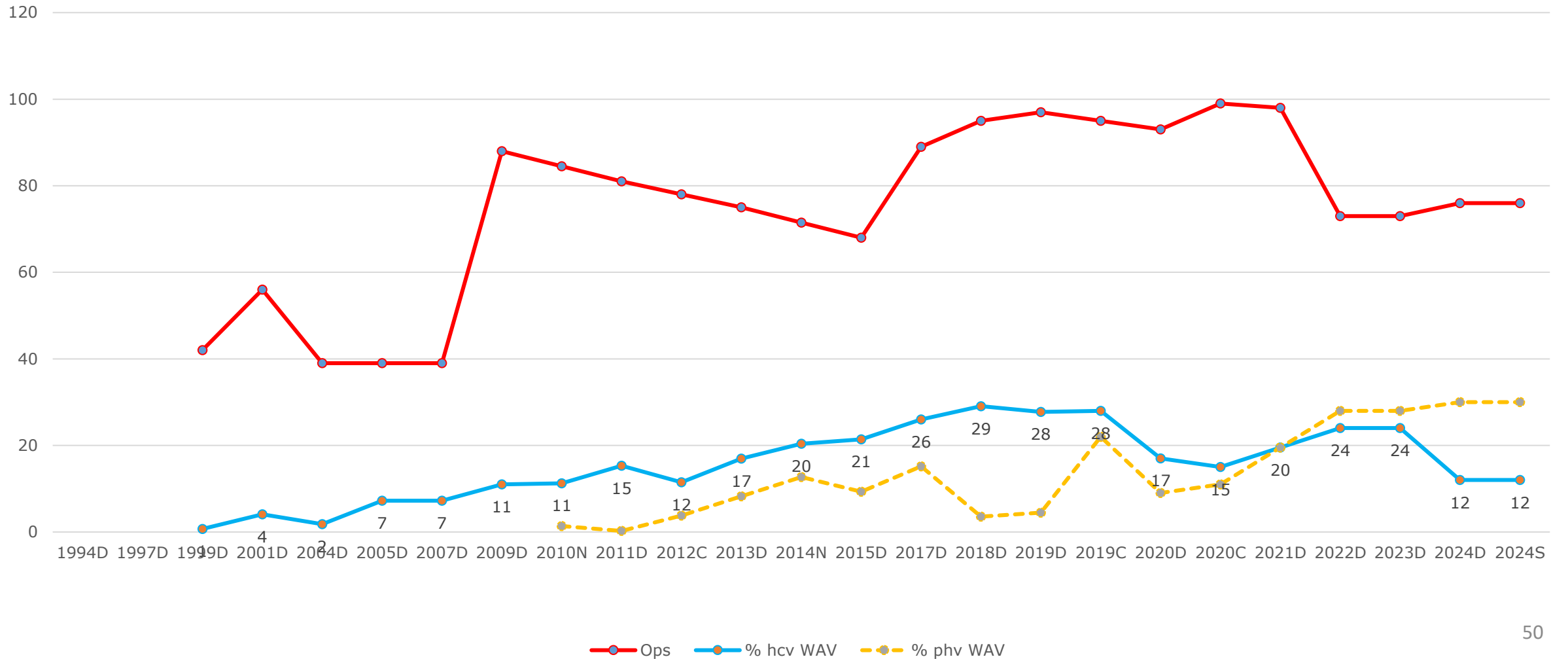
# Key findings

- All responded to the question if they felt there were too few, about the right number, or too many hackney carriages in West Suffolk
- 57% felt there were too many
- 30% felt numbers were about right
- 6% said too few
- 6% made no response.
  
- 61% felt disabled passengers were adequately supported
- 25% said they did not know
- 7% said the question did not apply to them
- 8% felt disabled passengers were not adequately supported.



# **Unmet demand survey operator survey findings**

# West Suffolk - operators and percentage WAV in fleets

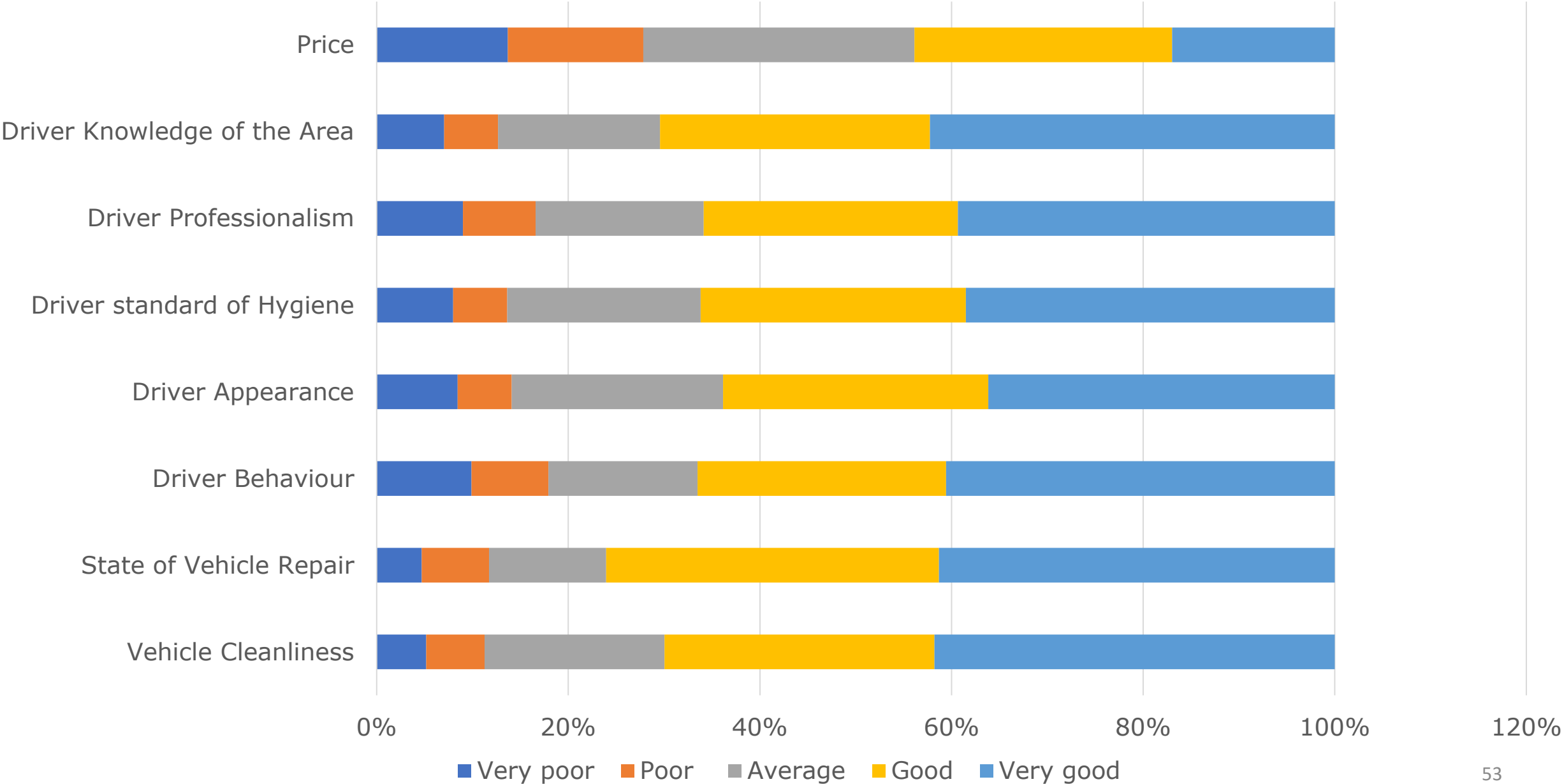


# Key findings

- Just three responses received to the operator's survey.
- One was from a company focused on serving customer need (including disabilities).
- Concern that modified vehicle policies were restraining them from adding more vehicles.

# **Unmet demand survey public survey findings**

# West Suffolk interviewees view of aspects of service



# Taxi Unmet Demand Survey – accessibility findings

## Accessibility

Of the total responses to this question, which show a wide variety of needs:

- 18% said they found it hard or impossible to step up into larger WAV style vehicles and would therefore need a saloon-style vehicle
- 12% of responses were from wheelchair users that would need a WAV
- 5% were wheelchair users who would not need a WAV
- 3% would need the driver to help them transfer and to then store their wheelchair safely.
  
- A shortage of WAV style vehicles was reiterated by seven people in the general comments.
  
- Respondents were invited to reply to eight statements relating to refusals, extra charges or being made to feel uncomfortable by drivers.

# Taxi Unmet Demand Survey – accessibility findings

There were a total of 52 mentions for the set of negative statements:

- Of these, the most common statement was for 21% of people who said they had been made to feel uncomfortable by a driver due to their disability (11 people)
- 15% said they booked through an operator but were refused travel when the vehicle arrived
- 13% said they were refused by the operator on booking
- 13% the driver refused to take them because they were travelling in their wheelchair
- 12% said they were ignored when trying to flag down a vehicle
- 10% said the driver refused to take them as they had an assistance dog (five people)
- 8% said they had been refused due to some other aspect of their disability
- 8% reported had been charged more due to their disability

There were at least four people mentioning each of these statements, which is concerning. One person said all eight applied to them.

Another person said five applied, 10% said four applied, one person said three, 17% two and 62% said one applied.

# Taxi Unmet Demand Survey – accessibility findings

“Helpful driver, mother aged 90 with mobility issues allowed time and support for her to get in taxi.”

“The one wheelchair taxi we can get is very good, and patient, taking really good care of my son.”

“Being disabled all my life has relied on taxi service. I’ll not condemn any, but with a hearing issue, I do struggle with different languages. This is not an attack on multi-cultural identity, but rather an issue that impacts my own situation.”

“More availability and disability awareness.”



# Taxi Unmet Demand Survey – accessibility findings

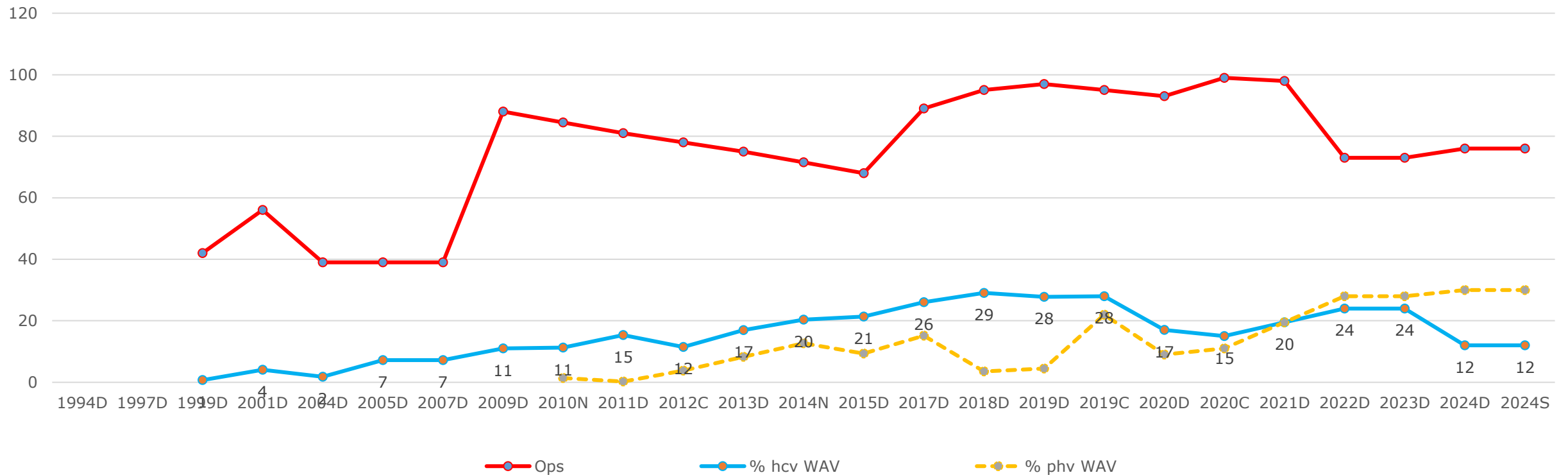
- Two people took the opportunity to say they would identify details for wheelchair accessible vehicles using the West Suffolk website but found it difficult as they were not currently available.
- Two mentions were obtained for being required to pay cash and disabled people not being assisted.
- There were at least three clear refusals for disabled customers noted amongst these responses.

## **Three very serious concerns:**

- One instance where a vehicle did not turn up when they told the person they had an assistance dog.
- Another being refused travel because they had a walking aid that would not fit in the vehicle.
- One where a visiting friend saw them refused a hackney carriage journey from a rank.

# Wheelchair accessible vehicle provision

West Suffolk - operators and % WAV in fleets



Operator numbers and % of wheelchair accessible vehicle (WAV) provision in the fleet (Ops = operators, HCV = hackney carriage vehicles, PHV = private hire vehicles)

# Wheelchair accessible vehicle provision

- Wheelchair accessible vehicle (WAV) proportions had been rising in both fleets until 2023.
- Since then, WSC has seen a decline to just 12% of the hackney carriage fleet
- WAV provision across the private hire fleet had increased to 30% by the time of the survey.
  
- The latest Department for Transport survey of overall licensed vehicles statistics covered information for the end of March 2024.
- At that time 23% of the total fleet was WAV style.
- This placed the authority **40th out of the 267** licensing authorities in England .
- By vehicle type, the authority was **104th out of 199** for hackney carriages (12% of hackney carriages WAV).
- **10th** in order of private hire (30% of fleet) **out of 267**.
- This shows a very positive picture overall for the level of WAV, although there is a sharp disparity between private hire and hackney carriage provision levels.

# **Unmet demand survey key stakeholder survey findings**

# Stakeholder survey

The following key stakeholders were contacted in line with the recommendations of the BPG:

- supermarkets
- hotels
- individual pubs and nightclubs
- other entertainment venues
- restaurants
- hospitals
- police
- disability representatives
- rail operators
- other council contacts within all relevant.

# Stakeholder survey

- A third of key stakeholders, 12, said they thought people had given up waiting for licensed vehicles.
- All responded on what arrangements they believed people had made. These included:
  - person walked
  - person walked (or advised to walk) to a rank (2)
  - on race days suggest people go to rank
  - return for a further drink but watch rank (1)
  - staff taking people home (2)
  - arrange for lifts to be provided
  - arrange shifts so staff can go home on public transport
  - a staff member contacted a friend who was a taxi driver
  - main issues are when vehicles are serving school contracts in afternoons (2).

# Stakeholder survey

- In terms of times people found it hard to get taxis, key stakeholders suggested (number responding in brackets):
  - Saturday overnight (11)
  - Friday overnight (10)
  - Monday to Friday afternoons (4 per day)
  - Thursday overnight (one)
  - Sunday mornings (one)

# Stakeholder survey

- In terms of times people found it hard to get taxis, key stakeholders suggested (number responding in brackets):
  - Saturday overnight (11)
  - Friday overnight (10)
  - Monday to Friday afternoons (4 per day)
  - Thursday overnight (one)
  - Sunday mornings (one)



# **Unmet demand survey survey recommendations**

# LVSA conclusions

“With reference to the two specific questions posed in the Study brief: There is no evidence of any unmet demand for the services of hackney carriages that is overall significant. On the contrary, the level of observed hackney carriage demand at ranks could clearly be serviced by a much smaller fleet were vehicles only providing rank and hail.

There is no legitimate requirement that hackney carriages only service ranks and it is also clear they undertake a wide range of bookings, contracts, app service meeting a wide range of need across the full area. We do not consider it would be appropriate at this time to set either a limit at the current level of hackney carriage vehicles, nor one lower given that market forces should prevail.”

# LVSA conclusions

“The removal of the two zones does not appear to have had any either positive or negative clear impacts, and although the policy regarding hcv WAV has reduced their number, overall provision of WAV within the total fleet compared to the English situation is good.

Most ranks see sufficient of the right kind of vehicle although detailed issues have been reported.

In respect of if existing hackney carriage vehicles are accessible to all who wish to use them, this does appear to be the case.

Further wheelchair users can and do use the services of the existing fleet both at ranks and by contacting vehicles by phone. However, given the high level of private hire WAV style vehicles this broadens demand and should be encouraged.”

## **Next steps...**

“A method is needed to encourage continued feedback from the public and key stakeholders, and a way by which all parties involved can work together to see continual improvement in the overall licensed vehicle service offered in West Suffolk.”

West Suffolk Council has committed to undertaking taxi and private hire vehicle policy review in 2025.

# Unmet demand survey

**Questions?**

# Future forum sessions

# Best practice guidance

## Consultation with the trade

- Inform on upcoming developments and changes
- Raise topic areas for engagement with the trade
- Seeking views and ensuring that they are considered during policy development
- Forums more frequent during 2025 – focus on policy review

# Section 1

- Age limits (8.4)
- Emergency equipment (8.18)
- Impact of quantity restrictions (9.2)
- Accessible fleet (8.9)



# Section 2

- Medical and vision assessment (6.6)
- Inclusive vehicle specifications (8.10)
- Disability awareness (7.2)

# Section 3

- Pedicabs (8.3)
- Vehicle safety ratings (8.5)
- Environmental considerations (8.6)
- Vehicle testing (8.19)

# Section 4

- Driver proficiency (6.4)
- Language proficiency (6.9)
- Topographical knowledge (6.11)

# Section 5

- In person visual and audio equipment (8.17)
- Vehicle condition check (6.13)
- Taxi ranks (11)

# **Review of taxi and private hire vehicle policy**

Explore survey recommendations

“A method is needed to encourage continued feedback from the public and key stakeholders, and a way by which all parties involved can work together to see continual improvement in the overall licensed vehicle service offered in West Suffolk”

Thank you very much for your time!

Questions and feedback are very welcome

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