

Proposed changes to the West Suffolk Council Hackney Carriage and Private Hire Conditions Policy Handbook – summary

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1. Summary

The Portfolio Holder for Regulatory and Environment has made the decision to consult on proposed changes to the West Suffolk Council Taxi and Private Hire Vehicle Policy Handbook.

Contained within this briefing:

- reasons for review
- information on the current policy
- summary of findings from review
- future vision and proposed changes
- stakeholders to consult
- consultation timeframe.

2. Reasons for review

West Suffolk Council has responsibility for licensing taxis (hackney carriage vehicles (HCVs) and private hire vehicles (PHVs)), 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.

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 covering the former Forest Heath and Zone B for the former St Edmundsbury areas)
- the age of the taxi fleet.

Consideration was also given to future requirements of an environmentally friendly taxi fleet and the impact of COVID-19.

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 sought the views of the trade and disabled users.

Once consultation is launched, the full report will be available for review.

3. Information on current policy

WAVs are vehicles that are specially built or converted so a wheelchair user can travel as a passenger while remaining seated in their wheelchair.

Since at least 2016, the council (formerly Forest Heath and St Edmundsbury councils) has a policy in place to gradually increase the proportion and number of WAVs in the area. This has been implemented through a rule that any new or replacement vehicle has to be a WAV.

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. This was with the aim of reducing vehicle emissions.

4. Summary of findings from review

• Wheelchair accessible vehicles

Some people do have difficulty finding taxi wheelchair accessible vehicles in certain areas of West Suffolk, but WAVs do not meet the needs of all people with disability or mobility issues. As such, a mixed fleet of vehicles is required. The right approach needs to be carefully considered alongside local need, geographic factors and requirements of the trade. The current policy does not allow for this, as it requires every new or replacement taxi to be a WAV. That said, there is also a lack of understanding across the trade about the range of WAVs available to them. Some of these would potentially offer more flexibility and greater accessibility for a wider variety of users than the large people carrier style WAVs currently used.

The expected demographic changes in West Suffolk will likely place additional capacity pressures on the taxi industry over the next two decades. The age group 65 plus and 85 plus are both projected to increase. Given that these age groups are more likely to have long term health problems and/or disabilities, the demand for an accessible fleet is probably going to increase.

There is not an equitable balance of WAVs across the two taxi zones. However, the combined balance across the district, if the zones were to be merged, would likely be sufficient to meet demand at this time. As of August 2021, the values for West Suffolk WAV proportions across the district were:

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

Breaking this down into the current zones, there are 14 licensed in Zone A and 31 in Zone B.

- **Taxi zones**

Survey responses to whether to merge zones was very low across the trade. This may suggest that a lot of those involved in the trade have no opinion either way. Views from those in the trade who gave a response strongly leaned towards retaining the two zones. While the prospect of merging the zones does not appeal to the small number of local taxi licensees who answered this part of the survey, we believe it is unlikely to have any serious negative impact.

One concern is around honey-potting (drivers from less lucrative areas being drawn to more lucrative areas, causing unmet demand in some areas and a surplus of taxis in others). The council, however, believes that, given the regular demand on taxis and the geographical spread of West Suffolk, the risk of drivers leaving their usual custom base to travel to another town in the hope of picking up more trade is low and it will work with the trade to mitigate any risks.

In addition, besides increasing the availability of WAVs to customers in Mildenhall and Newmarket, it may have other benefits. For example, it would also mean that drivers, having taken a fare across from the former Forest Heath to the former St Edmundsbury areas, or vice versa, could actually then pick up fares going in the opposite direction.

- **Age of vehicles**

In 2025, the planned introduction of the 10-year age limit policy will create a bottleneck where a large proportion of the taxis will need replacing (including a third of WAVs). This may result in a reduction in the size of the fleet and consequently may lead to unmet demand. There is no requirement for the vehicles on replacement by this date to be electric or hybrid (as we recognise there is limited infrastructure to support this requirement at this moment in time). Findings from the latest survey supports the view that we would not necessarily want all of these to become WAVs (which would be the case if the current policy continues). In addition, the Government's 2030 deadline for the banning of the sale of petrol and diesel vehicles means that we need to reconsider our approach.

We do not want to force a high proportion of the trade, who mainly operate independently, to potentially replace their vehicles twice in a short period of time. Therefore, we need to plan for changes over a longer period of time.

Extending the age limit to 15 years would achieve several things: firstly, it would limit the impact on the fleet as outlined and, secondly, it would ensure that the oldest cars with the highest carbon emissions would still be replaced from 2025. All taxis will still be required to undertake a twice-yearly safety check, ensuring that they continue to be roadworthy and safe.

Research into possible alternative fuelled vehicles shows that they are increasingly becoming more affordable when compared to other popular taxi vehicles. However, investigation of electric vehicle infrastructure highlighted that there are still too few public EV charging points for this option to be fully viable. What is more, options for electric WAVs are extremely limited and costly. For these reasons, the council will not be adding a requirement for licensees to adopt an EV at this time.

5. Future vision

The review has set out a vision for the future of our taxi industry, which we aim to achieve by 2030. This is based upon:

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

To meet our longer-term aims, there will need to be further policy changes as we approach 2030. This will include re-assessing our level of WAV provision and determining how we can achieve this, as well as ensuring that we meet our legal responsibility to ensure that the needs and safety of the travelling public is met.

6. Proposed changes

In order to work towards the long-term vision, the review has proposed three changes to the current policy, which are as follows:

- to remove all wheelchair accessible vehicle (WAV) requirements for taxi licensees
- to merge the two taxi zones into one single zone
- to increase the maximum age of vehicle limit to 15 years old

We are now consulting on these proposals until 18 May 2022.