

## Wheelchair Accessible Vehicle Transfer Consultation

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| 1. | <p>Hi there i own and drive wheelchair car myself. I think its not fair to change the rule or you need to change for everybody so we can buy normal saloon car too. I need to drive now huge car with im not happy with. It cost me more i dont get any advantage comparing to other cars also i can not find in white colour. Also its difficult to find driver for disable accessable cars. So i would wish everybody should be equal either we all drive disable accessable or if person wish to drive .</p>   |
| 2. | <p>Dear Sir/Madam<br/>Whereas the issue of WAVS to 50% has been made with the best intentions, I think you have overlooked the fact that you are now discriminating against many disabled people who are not in a wheelchair and also the elderly who find the height of WAVS intimidating. On MANY occasions I have seen both disabled and elderly people waiting on the rank for a saloon car for lower access. I think 50% is too many. When this bill was first introduced and our representative had meetings with government ministers, the percentages talked about were around 30%.</p>   |
| 3. | <p>I totally agree that it is the right thing to do to remove the requirement ... as a driver I have so so many passengers with minor disabilities ( or recovering from hip/knee operations etc) who are genuinely worried by the lack of normal saloon vehicles...many of these people find it extremely painful or in some cases, impossible , to get in and out of the higher disabled access vehicles such as the Peugeot Partner or E7/London style cabs. We have met the originally specified target % of disabled access vehicles in the fleet and it is now time to remember these other passengers who will be severely affected if the % of normal saloon style vehicles is reduced further.</p>                              |
| 4. | <p>From my point of view as being a Taxi driver for sixteen years here in Brighton &amp; Hove, i would say this a very good decision and a reasonable policy change not to have more Wheelchair Accessible Taxies as i see very often many costumer find it really hard to get into the car and very unhappy about it. Besides, i don't see many disabled people around require a Wheelchair Taxi, as a result i can't remember last time i did a Wheelchair job. So, i believe there are enough disabled Taxies already and should be even reduced to 30 percent if not less.</p> <p>I have been a journey man for the last 12 years and driving a Wheelchair car is not comfortable by any means neither for costumer nor for me.</p> |
| 5. | <p>Dear Sir/Madam<br/>Thank you so much that's great.<br/>I'm for the change.<br/>It should not have any negative impact because the percentage is 50:50.<br/>I think 50:50 is far more than enough.<br/>Yes I have the city is flooded with taxis for locals and from outside I think you should do something about issuing plates every year plus all the cars coming from outside</p>  |

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| 6. | <p>I would like to comment on one issue ... which is the total amount of Hackney carriage vehicles 580 on 2019 as you sent us on the letter and the Hackney carriage WAVs is 291 which is roughly half of the taxis in Brighton-Hove.</p> <p>My issue is some of WAVs and it is a 7 or 8 seater is driven by drivers that have exemption from taking a wheelchair passenger ...</p> <p>The question here why are they still driving a WAVs ?</p> <p>Instead you could ask them to drive a saloon vehicle and I'm sure they won't like it as they will lose out on multi seater tariff.</p> <p>To recap</p> <p>The ratio is 50% which is very good but actually it is not</p>   |
| 7. | <p>Thankyou for your interest in my views on the subject of WAV taxi numbers. I have been a taxi driver since 2001 and have worked 10 years as a private hire saloon car driver and subsequently 8 years as a multi seat hackney carriage owner and driver having been issued a hackney plate in 2011, during which time I have operated WAV taxis. Over that time I have had a lot of experience and believe I have a very well informed view of the subject.</p> <p>I think that there are two main issues which the council should take into account regarding numbers and I also have a suggestion which would, in my opinion, be a bit fairer for everyone.</p> <p>1) Cost: It must be noted that there is a fairly hefty price difference between putting a new cab on the road with wheelchair accessibility and an ordinary vehicle. Cab Direct, who supply most of the WAVs charge in the region of an extra £8000 for the converted vehicles over the standard version of the Peugeot partner for example. In addition it is far easier for the owner of an unrestricted plate to replace their vehicle since they can choose from almost any regular saloon or estate car with the option of buying a second hand vehicle that won't have been used as a taxi, an option not available to WAV restricted plate owners. I would guess that averaged out over say 3 years a WAV is probably £30 - £40 a week dearer purely on that initial cost basis.</p> <p>2) Demand. From what I have noticed over the past few years the overwhelming majority of jobs that I have taken involving wheelchair users have been booked via Radio Cabs, the circuit that I work on. Indeed it is really quite rare for people to come to cab ranks in wheelchairs and extremely rare for them to hail down a taxi. More common, in fact, is the situation whereby a person, often elderly, will prefer a saloon car over my vehicle since it is quite hard for some of them to get in due to the high step up, a problem common to all multi seater WAVs.</p> <p>There are advantages to running a multi seat WAV however and on the whole I am quite happy to run one. There are people who use them for moving large items, people with pushchairs that like the ease of getting in and out. Also the tariff for 5+ people is decent and does make up for the extra costs involved. My main concern with the council policy is that in reality you have 250 cars each costing an extra £2000 a year to be on the road, that is £1/2 million a year collectively being spent not on the actual transportation of wheelchair users but merely the availability of it, a service which is seldom taken up. In the days before such widespread availability most wheelchair users were perfectly happy to get out of their chair and get in a car with the wheelchair folded in the boot, even now I often get wheelchair users who get out of their chair and get in the cab on their own. I really think that the number of people who actually need to be pushed into a cab without getting out of their chair must be a miniscule proportion of all wheelchair users.</p> <p>Taking all this into account, and given that the vast majority of wheelchair taxi rides are actually booked through cab firms I would actually suggest that 50% of the cabs being wheelchair accessible is a ludicrously high figure. It would make far more sense to ensure that the taxi companies themselves provide a good service, as I believe my company does. The current proposal for new and transferred plates is clearly creating an unfair system whereby owners like me will be forever required to put on a WAV, and everyone else can take advantage of the lower purchase and running costs of saloon cars and hybrids. Perhaps the council could consider a system whereby once you have had a WAV for a certain time, maybe 10 years you could be released from that requirement, or maybe have a waiting list for people to come off the WAV requirement. Either way I personally feel quite hard done by by the current proposal and do feel that I</p> |

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|    | <p>would like to have more choice about what vehicle I could consider using. It seems to me that in the current climate where we are facing quite considerable difficulties as a trade anything which could help us reduce our costs would be most welcome. We are, after all, small business owners and, like all businesses we need to keep costs down.</p> <p>I hope you find my views well considered and sensible. I would welcome the opportunity for further discussion if you have time.</p>  |
| 8. | <p>With reference to your 4 questions :-</p> <ol style="list-style-type: none"> <li>1. I'm in favour of this Wheelchair Accessible Vehicle policy change.</li> <li>2. Having a mixed fleet of vehicles will cater for the needs of all service users.</li> <li>3. I believe 30% of the B&amp;H Taxis should always be wheel chair accessible.</li> <li>4. Some customers in wheelchairs prefer a saloon car to a WAV vehicle.</li> </ol> <p>My brother was disabled, he hated travelling in a WAV vehicle with his back to the oncoming traffic, it made him feel sick.</p> <p>When I took him to the Hospital he always sat in the front seat of my Taxi (Skoda Octavia), I folded the wheelchair and stored it in the boot.</p> <p>Maybe when B&amp;H council license a vehicle as a Taxi they should make sure a folded wheelchair fits in the boot.</p> |
| 9. | <p>(1) I am all for the policy change.<br/> (2) it caters for all of the public. (3) 50 per cent is more than enough. (4) A condition of license must make it compulsory that every driver must be able to offer CARD facilities to the passenger/s at all times.</p>   |

10. *RE: Taxi Policy Review - Hackney Carriage Vehicle Transfer and Wheelchair Accessible Vehicle (WAV) review*

*What are your views about this policy change? – are you for or against the change?*

I agree with the change it will encourage new owners to change their vehicles to greener hybrids and EV's, which will lead to increased air quality etc.

*How do you think this policy change will impact service users?*

I think it will make no difference, I have a WAV and work nights for many years. I have averaged about 1 wheelchair job a year. My day driver has a bad back and has an exemption. There is a massive oversupply of WAV's for very little wheelchair specific work as an independent at night.

*What percentage of the Hackney Carriage fleet do you think should be WAVs to meet the needs of all taxi service users?*

I think 50% fleet as WAV requirement might be relevant and prudent for taxi companies to meet the specific need of their customer fairly, but for cabs like me not on circuit the percentage should be much lower- the need is just not there.

I would suggest the number of WAV's needed for street (never had one in five years) pickups or rank pickups (about 1 per year), would be more like 20% maximum. It could be even less if you sanction drivers that refuse to do wheelchair jobs, which I have seen.

I and many others would love to change my vehicle from a polluting diesel WAV to a greener EV or hybrid car (Hybrid/EV WAV's do not exist yet).

*Do you have any other comments to inform this review, related to the service Hackney Carriage provides for taxi service users, including disabled passengers?*

Many disabled customers can get in a sedan more easily than a WAV. Providing an equal access service for wheelchair sub group of users is very important but many more other disabled people, particularly old people, find it hard or impossible to get in or out of a WAV. Anecdotally I have had many more people not taking my WAV for a sedan car than I have had wheelchair pickups.

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| 11. | <p>Thank you for your letter regarding the above proposed Policy change.</p> <p>1/ I can confirm that I am in agreement to this change.</p> <p>2/ As long as a limit is in place, the continued number of WAV'S will be maintained ( and if fact may well increase) as and when additional Hackney Plates are released.</p> <p>3/ A 50% balance of WAV'S and Saloon vehicles would appear to be a fair balance.</p> <p>4/ The "age old" problem is that the vast majority of disabled passengers call for a Wheelchair taxi, so the issue is a Private Hire one.<br/>If the Taxi Companies cannot keep those WAV'S Hackney Carriages on their "circuits", and they go Independent, it then becomes those Companies problems to solve, when customers call requesting a Wheelchair Taxi.</p> <p>A limit should be introduced national for the number of all new issue Saloon Private Hire vehicles,( but not WAV'S) by district !!</p> <p>An interesting point that needs taking up across the country!!!!!!</p> |
| 12. | <p>This my personnel opinion regarding the new legislation.</p> <p>1. I am for the change.</p> <p>2.this policy will not impact on the service.</p> <p>3. I think 30 a 40 % WAVs fleet is enough.</p> <p>4.The service is excellent for all users.</p>  |
| 13. | <p>in response to the about consultation please see my thoughts below.</p> <p>1. I agree to this new Policy Change</p> <p>2. In my experience customers are happy too use Saloons as well as WAVs, so as long as we keep to this proportion of WAVs I don't think it will have much impact.</p> <p>3. I think there should be at least 50% WAVs</p>   |
| 14. | <p>With reference to your letter dated 22nd November, I feel that the ratio of WAV cars in the Hackney Carriage fleet is now about right, so I support the change.</p> <p>I think service users like a mixed fleet as they all have different needs, I drive a low saloon and many of the jobs I get offered by the operator are for such a vehicle. Several elderly users are unable to access WAVs as they are too high and were genuinely upset about the council's policy of replacing all vehicles with WAVs at owner change.</p> <p>I think 50/50 is about right.</p>   |

15. I am aware that BHCC required all presentations for this WAV consultation to be in no later than 2nd January which I did full fill, please see attached email, however, my presentation was incomplete as I was waiting on confirmation from certain sources, I was and still am unable to obtain the confirmation I was awaiting for, however without naming names I would still like to bring a further point that is more appropriate.

Considering a long history of poor judgement on behalf of BHCC licensing inevitably these judgments/regulations come at a financial cost to us in the trade, with our income already cut we are finding the issue of mental health becoming more apparent.

A driver who I have known for many years was recently admitted into Millview hospital after suffering a nervous break down, this was brought on by unforeseen financial pressure when the driver in mention had recently taken on HP for a replacement WAV only to find out that the station rank relocation was going ahead, the driver was aware that this decision would affect his earnings, and found he was unable to cope, resulting in his hospital admission.

With this and the evidence that the WAV fleet is more than adequate, I hope the council can come to a more favourable decision for the trade.

I do hope that you find my points valid and you can use them in your decision making.

With reference to the WAV consultation!

- What are your views about this policy change? –are you for or against the change?

Initially I was against the policy, but as since it has been finalised I did not have any issues with it.

- How do you think this policy change will impact service users?

I believe that having such a high percentage of WAV in a city with a high percentage of young and mobile and low percentage of mobility shops, the change will have no impact whatsoever on the end user.

- What percentage of the Hackney Carriage fleet do you think should be WAVs to meet the needs of all taxi service users?

I have many views on this, my initial issue is how the HCO when issuing a new plate will then inform the owner on how they can get a medical certificate of exemption, why issue plates for a specific purpose then make the vehicle inaccessible to those it was intended for.

With the afore mentioned issue put alongside the known fact that a large percentage of drivers simply refuse to do wheel chair jobs the actual number of available WAV's in the city is far less than the 55% that BHCC believe they have available, however, whatever the true figure is this is more than enough as I have been lead to believe by heads of Passabilities and MS society, please see below for further details.

- Do you have any other comments to inform this review, related to the service Hackney Carriage provides for taxi service users, including disabled passengers?

Having dealt with the Brighton Station rank relocation I was in contact with many charities I deemed would be effected one of these was Passabilities the disability charity I would like you to read the email I received from them as this will definitely help you to make further adjustments to the fleet.

The following email was sent to me from Amanda Brice from a Possabilities email address on the 9th October

16.

#### TAXI POLICY REVIEW

As part of the review of this policy change, we are seeking views from the local taxi trade and local disability and age focused community groups.

We would like your comments in relation to the following questions:

- What are your views about this policy change? – are you for or against the change?

I am for policy change which should have happened long before.

- How do you think this policy change will impact service users?

Most of the non-disabled service users prefer low saloon car. Not forcing saloon cars to become WAV following the transfer will allow more low saloon cars in taxi fleet. This will be in benefit of the great majority of taxi users.

- What percentage of the Hackney Carriage fleet do you think should be WAVs to meet the needs of all taxi service users?

Not more than 20%

- Do you have any other comments to inform this review, related to the service Hackney Carriage provides for taxi service users, including disabled passengers?

I understand that local disability focused community groups may wish higher percentage of hackney taxis to be wheelchair accessible. I absolutely agree that WAV are essential for disabled passengers and our fleet must have enough vehicles for that purpose.

I am WAV driver and proprietor. Personally I get wheelchair customer on board in average once in about three months. Said in another way in a whole year I get on board in average four wheelchair jobs. That's why I find recent ratio of 50% too high. 20% of taxi fleet will be enough to meet the demand.

Also great majority of my customers do not like high saloon and van taxis. Very often at taxi ranks passengers skip this kind of compulsory WAV and go to first available low saloon car. Especially older people can not get in our high vehicles. Also WAV taxis are not as comfortable as low saloon cars.

In conclusion I would like to say that current ratio of 50% is in benefit of wheelchair users but not in benefit of the rest of the service users. Lowering this ratio to 20% will ensure that there are enough WAV and also will meet the demand for low saloon cars.

17. From: Jim Whitelegg

Subject: RE: Wheelchair Accessible Vehicle Consultation



Hi Geraldine,

As discussed at our meeting (29/10/19) and confirmed in the subsequent email attached, which is also included below (19/11/19), because of the tight timelines for the March committee we would consult and submit a specific report regarding the policy change and then look at doing a wider review.

I take your point about offering the document in other formats. We would as a matter of course provide these on request but we can look at how we make this more accessible in the future.

Kind Regards, Jim

Dear Geraldine,

It was really good to meet you properly on the 29th October. I just wanted to follow up on a couple of actions to come out of the meeting. You mentioned that you Chair a group called the "Disability Collective" which is made of various smaller organisations that meet every couple of months. It would be really useful to include the group in consultation going forward. For our records and reference for future reports are you able to give a brief summary of the group, who attends/membership and its purpose? Happy to go through you or contact organisations directly for consultation purposes.

As discussed Streamline have had a change in Directorship with John Streeter and Dave Smith Leaving. Paul Wardle is one of the directors and organises the disability awareness training for drivers. I've included his email if you wanted to get in touch

With reference to the 50% target level for hackney carriage WAVs, this was discussed when the report was considered at licensing committee in September 2010 link to committee report and also referred to in subsequent unmet demand surveys carried out.

As discussed our intention is to submit a committee report reviewing the specific WAV policy change for March committee and then moving forward look at a wider review of WAV provision in the City. As part of the March review we will consult with disability groups and the Trade, most likely towards the end of November till the beginning of January.

Thanks, Jim

Jim Whitelegg| Regulatory Services Manager (Licensing & Trading Standards), Safer Communities | Brighton & Hove City Council

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From: Geraldine Desmoulins

Sent: 27 November 2019 17:44

Subject: RE: Wheelchair Accessible Vehicle Consultation

Hi Jim

Thank you for this. I wonder if you could let us know how you plan to engage disabled people in this review as they are the group most impacted by your decision. I understood the review was going to be more far reaching not just about policy change, unfortunately this approach just looks like a tick box exercise to mitigate the lack of consultation and engagement prior to changing the policy. I must admit I am confused because from our conversation when we met I was sure that was not your intention.

The further concerns I have about this is I am not sure why anyone would respond because it reads that you have already made a policy change, sighting the reasons why so the deed is done. It is difficult to get views from disabled people at the best of times because they have so many challenges in their lives including the lack of equality they experience especially not being able to get a suitable taxi on demand like non-disabled people. The document is factual but also misleading, because reading it you would think the fleet is 50-50 which is far from the case if you factor in private hire, so this need some explanation. People do not understand taxi licencing so they require more background information.

Unfortunately I also have to point out, that the document and the approach is inaccessible so that speaks to the target audience? Again perhaps not the intention. Nowhere do you offer any support for people who may need a reasonable adjustment to respond, it is also good practice to, at the very least, offer documents in other formats. If this is the only approach you intend to take it will exclude disabled people so the review will not be credible.

Clarification would be really helpful as what you are trying to achieve with this consultation as it is far from clear.

Kind regards

Geraldine Des Moulins  
Chief Officer