



Taxi Licensing
Brighton & Hove City Council

January 2 2020

On behalf of the GMB - Brighton & Hove Taxi Section and Unite The Union – South East Section, this document addresses the Taxi Policy Review - Hackney Carriage Vehicle Transfer and Wheelchair Accessible Vehicle (WAV) survey.

Background

This survey is with reference to the March 2019 Licensing Committee where an amendment was made to the conditions of licensing that when the ownership of a hackney carriage vehicle is transferred to another party that whereupon the renewal of the licence of that vehicle is then compelled to become and remain a wheelchair accessible vehicle WAV.

The trade has been asked to respond to specific questions which have been provided as below.

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

The council's policy over many years was to ensure that all disabilities are catered for. Effectively 'Access for All'. This has now been achieved with 50% of the Brighton & Hove hackney carriage fleet being wheelchair accessible and the council, and indeed the trade, should be proud to have achieved this policy that has giving mobility access to not only wheelchair users but also to those with other disabilities.

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

The policy change will ensure that that all disabilities are catered for. This is based on the one simple fact that that if the policy had not changed then there would be an imbalance of hackney carriage mobility access which would then not cater for all disabilities.

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

To ensure that all taxi users are serviced the percentage of WAV's should be 50% allowing for the councils policy to service all people with various disabilities allowing 'Access for All' which has been achieved.

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

Hackney Carriage Vehicle – Definition, Purpose & Status

It must be fully understood that that this survey only relates to hackney carriage vehicles and that the primary status of a hackney carriage vehicle is to serve the street and ranks in the city. Consequently the purpose of the survey is to review any 'impact' for taxi users following the amended conditions of licensing having reached the councils own policy of ensuring hackney carriage vehicle access for all disabilities when accessing a hackney carriage vehicle on a taxi rank or via hailing an hackney carriage vehicle in the streets.

Hackney Carriage WAV Survey Should Exclude Private Hire Operators

Consequently for all intentions and purposes this survey and the policy has nothing to do with obtaining a wheelchair accessible taxi via any private arrangement such as by means of any private hire operator.

Any confusion or misunderstanding of the status of a hackney carriage vehicle and a private hire service must be avoided to ensure the validity of the survey and any potential outcome.

Having established the criteria of the intentions of the survey we can now address where the trade is today having achieved the councils own policy of a hackney carriage fleet of 50% for mobility access for all disabilities.

Having a fleet of 50% WAV's means that one in two hackney carriage vehicles in the city is equipped to take a wheelchair.

This then means that all the ranks in the city will have a WAV available if needed and indeed anyone wishing to seek evidence of this will only have to take tour of the ranks to support the fact there are clearly an abundance of readily obtainable hackney carriage WAV's.

Some taxi users avoid WAV's

It is a fact that not everyone with a disability can manage to get into a WAV without difficulty, especially where there are a considerable amount of WAV models that have much higher seats. Consequently it is not unusual for those with impaired mobility are sometimes left waiting on a rank which consists only of WAV's for a low saloon hackney carriage to arrive. This is especially with reference to older people and those of various ages who have medical issues with their backs or hips making longer journeys very uncomfortable.

Hackney Carriage Numbers – Managed Growth

Every three years the council undertakes a detailed Hackney Carriage Survey which ensures that there are a sufficient number of hackney carriages available to serve the city.

The findings of these surveys provide information to the council to make decisions as to whether to either:

- **Completely delimited hackney carriage numbers**
- **Stop issuing any further hackney carriage vehicle licenses.**
- **To adopt an alternative policy such as 'Managed Growth'.**

Following clear evidence in the several three yearly surveys over the years it has shown that the city is well served with the number of hackney carriages available.

However the council has continued with the policy of 'Managed Growth' by issuing five additional hackney carriage licenses per year with the condition that these are compelled to be WAV's. Last year a small change was made that there was also the option of the vehicle being a plug-in electric/hybrid vehicle.

There may indeed be an argument that the city has enough hackney carriages where the drivers also now have the additional competition of vehicles not licensed by the council predominantly working in the city without any of the conditions of the 'Blue Book' being applied and that the council should adopt a policy of limitation.

The council has also continued with its policy of the condition of licence that any hackney carriage which has been compelled to be a WAV under pre-existing conditions of licensing must remain as a WAV.

In addition there is also a condition of licensing under of the 'Blue Book of Conditions of Licensing' which states:

89 - Suitability: All new or replacement multi-seater vehicles (vehicles capable of carrying 5 to 8 passengers) must be wheelchair accessible.

This means that any hackney carriage proprietor that wishes to have a vehicle that carries more than four passengers must provide a vehicle that is also wheelchair accessible and many such proprietors do this voluntarily without any other conditions of WAV compellability of licensing.

This condition also applies to a private hire vehicle should the proprietor wish to carry more than four passengers.

Conclusion

It is paramount that all us that endure various disabilities have access to suitable mobility transport when a seeking hackney carriage on a rank or in the streets via hailing.

With the council and the trade working together this has now achieved the aim of the policy for access for all disabilities with 50% of the hackney carriage fleet being WAV compliant.

Consequently any change to the amended conditions of licensing which was made by the Licensing Committee in March 2019 will cause an imbalance to the council's policy of mobility taxi access for all disabilities.

The next review of the policy can be made when the 2021 Hackney Carriage Survey is undertaken.

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