



Wheelchair Accessible Taxis Consultation Document August 2010

For the purpose of this consultation the term taxi has been used to describe a Hackney Carriage. This is different from a Private Hire Vehicle. A hackney carriage is a taxi with a meter which is licensed to collect passengers from a taxi rank and is available to be hailed in the street.

A private hire vehicle, such as a minicab, is not licensed to collect passengers from ranks or to be hailed in the street, but is licensed only to be hired by prior arrangement only.

The consideration of wheelchair accessibility only applies to Hackney Carriages and for the purpose of this consultation will be referred to as taxis.

Background

1. Transport affects everyone and is essential for a strong economy and society, providing access to jobs, services and leisure activities. Taxi and Private Hire Vehicles (PHVs) are a vital link in the accessible transport chain and although disabled people are reported to travel a third less often than the public in general, they use taxis and PHVs on average 67% more.
2. Over the last ten years, there have been major improvements in the accessibility of the transport network as a result of the Disability Discrimination Act 1995.
3. The powers in the Disability Discrimination Act (to be replaced by the Equality Act 2010) allow regulation to be made requiring all new land-based public transport vehicles, including taxis, to be accessible to disabled people including those who need to remain in their wheelchair. Appropriate 'end' dates have been set in regulations by which time all trains, buses and coaches must be accessible. The regulation making powers do not apply to private hire vehicles.
4. In 2003 the Government stated that it intended to set standards for wheelchair accessible taxis and to introduce regulations that would apply to mainly urban authority areas. Since then however the Department for Transport has received a number of representations making the case for a broader range of disabled people's needs to be met in any regulations. As this is a complex matter regulations have not been made.
5. In 2008 the Department for Transport consulted on improving access to taxis, but no regulation or guidance has emerged from that consultation. The

government has published an interim standard for wheelchair accessible taxis and this is available on the Department for Transport website.

6. As a result of the proposed regulations, Shrewsbury and Atcham Borough Council introduced a policy requiring all new licensed taxis to be wheelchair accessible. Some 'grandfather rights' were granted to vehicles already licensed. The other district and borough councils did not introduce such a condition.
7. The Department for Transport continues to explore amendments to section 16 of the 1985 Transport Act contained within the Equality Act 2010 and it is suggested that should regulation be made it will require councils to move to a position where between 30% and 35% of the fleet is wheelchair accessible.

What is this consultation about?

8. With Local Government reorganisation, the five district and borough councils in Shropshire merged with Shropshire County Council to form Shropshire Council. Shropshire Council is now considering what requirements to introduce for taxis licensed across Shropshire in respect of wheelchair accessibility.

What is a wheelchair accessible taxi?

9. The term 'accessible taxi' can mean different things to different people. For the purpose of the consultation the following terms are used.
10. **Saloon Car Vehicles**
These vehicles are conventional cars and are not accessible to wheelchair users. They meet the needs of many people, including those with an ambulatory disability. As well as saloons, they may be hatchbacks or estate cars. They are currently licensed as taxis by Shropshire Council but would not be deemed as a wheelchair accessible vehicle.
11. **Wheelchair Accessible Vehicles**
These can be purpose built vehicles or converted multi purpose vehicles. Not all these vehicles in reality would meet the interim standard for a wheelchair accessible taxi but can generally accommodate a person in their wheelchair.

Who needs to read and contribute to this consultation?

12. We would particularly welcome responses to this consultation from:
 - Disabled people or their representative groups.
 - Taxi and private hire operators and drivers.

Particular questions that we would welcome your view on.

13. What is your view of the impact assessment? Do you have any further data that you would be able to send us?
14. What do you think are the potential impacts, costs and benefits of the different scenarios? (see options one to five in this document)

15. What do you think would be the right approach for Shropshire Council to take?
16. What other implications do you envisage for any of the options?

How do I respond to the consultation?

13. The consultation period begins on Friday 20 August and will run until **Monday 15 November 2010**. If you would like further copies of this consultation document it can be found at www.shropshire.gov.uk
14. Responses to the consultation should be sent to:
Licensing,
Development Services
Shropshire Council,
Shirehall,
Abbey Foregate,
Shrewsbury,
Shropshire,
SY2 6ND

Or by e-mail to licensing-central@shropshire.gov.uk

To be received by Monday 15 November 2010.

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What is the make up of the current licensed taxi fleet?

- 1 The taxi and private hire fleet in Shropshire is around 650 vehicles. Of these 147 are taxis. Of the 147 taxis 38 are wheelchair accessible vehicles. Thus in total around 26% of the fleet is wheelchair accessible.

The majority of these vehicles are currently only licensed to operate in the Shrewsbury and Atcham area.

- 2 Nationally there is one main manufacturer of a purpose built wheelchair accessible taxi and a number of small companies who convert standard production vehicles into wheelchair accessible taxis.
- 3 A new wheelchair accessible taxi (either purpose built or a converted multi purpose vehicle) can cost between £20,000 and £30,000. The second hand market for these vehicles is small, as consultation with manufacturers suggest that drivers tend to purchase such a vehicle new and then keep it until the end of its life (typically 12 years).

Financial implications.

- 4 The typical cost of a second hand saloon car for use as a taxi is between £6000 and £8000. Drivers of these vehicles tend to buy second hand cars when they are three years old and sell them on for very little at seven years old.
- 5 Annual running costs for a wheelchair accessible vehicle tend to be higher, typically just over £1000 more per year than for a standard saloon car.
- 6 Many licensed taxi drivers also hold private hire driver licences and would easily be able to make the switch from a licensed taxi to the private hire sector if they wished. Alternatively if there was no requirement for taxis to be wheelchair accessible a number of private hire drivers may switch to taxis.
- 7 It is clear that there is a risk that introducing a requirement for all taxis to be wheelchair accessible might lead to licensed taxi drivers transferring en masse into the private hire sector thus reducing the overall availability of taxis. What we want to achieve is for more taxis to be wheelchair accessible so that disabled people can have improved access to jobs, services and social networks and for the taxi trade to remain viable.

Options and impacts

Option One. Maintain the status quo.

Currently Shropshire Council licences taxis by zones based on the old district and borough council areas. As such taxis can only pick up fares within the zone for which they are licensed. These restrictions do not apply to private hire vehicles that can operate throughout Shropshire.

A different condition in relation to wheelchair accessible taxis applies in zone 4, the former Shrewsbury and Atcham area that require all taxis in that area to be wheelchair accessible with the exception of eight saloon cars licensed prior to 1st April 2009 which will remain licensed until 2012.

Shropshire Council is proposing the dezoning of taxi areas thus allowing taxis to pick up fares across Shropshire. This will result in a common standard for taxis across Shropshire and a common fare card.

For the status quo to remain, namely a requirement for wheelchair accessible taxis in Shrewsbury and Atcham area only, then zones must remain allowing different conditions for taxis across Shropshire.

Based on this scenario it would be left for the market outside of the Shrewsbury and Atcham area to achieve a wheelchair accessible taxi fleet, and given the relative financial impact of running a wheelchair accessible taxi compared to a saloon vehicle significant changes are unlikely for 20-30 years.

In addition, levels of accessibility will be no greater than currently the case – that is, in terms of the number of people being able to fit into a taxi whilst seated in their wheelchair.

The status quo scenario is unlikely to meet the council objectives or the needs and expectations of disabled people.

Option Two. Require all newly registered taxis to be wheelchair accessible.

Shropshire Council could determine only to licence new taxis that are wheelchair accessible.

This would leave the current taxi fleet as is and lead to a gradual increase in the proportion of wheelchair accessible taxis.

Around 7 new taxi vehicles are licensed each year by Shropshire Council. Given the size of the taxi fleet it is estimated that introducing this policy would lead to a gradual increase in the proportion of wheelchair accessible taxis with it taking around 13 years for the fleet to become wheelchair accessible.

As the cost of a wheelchair accessible taxi is significantly greater than a private hire vehicle it is likely that this policy may result in a reduction in the number of taxis as drivers leave the taxi trade at the end of their vehicle's life and move into

private hire. This may result in a reduction in the number of licensed taxis in Shropshire.

Costs

Assuming 7 new vehicles are licensed each year and the cost of a wheelchair accessible taxi is £25,000 then the annual replacement cost is calculated at £175,000.

Also assuming running costs for a wheelchair accessible taxi are circa £1,000 per annum more than a saloon car, the annual increased running costs is £7,000.

Total £182,000 per annum.

Other Implications

As wheelchair accessible taxis tend to be less fuel efficient than saloons the total carbon emissions may increase marginally. In addition the greater emissions would attract a higher level of vehicle excise duty. This may be offset by the introduction of new vehicles into the fleet with lower emissions than those they replace.

Benefits

The largest benefit comprises savings that vehicle owners make through exchanging a saloon car which they would replace every four years for an accessible taxi which, potentially, would need to be replaced every 12 years. As such, a driver would make an upfront payment of £25,000 for an accessible vehicle which would be offset by not having to purchase three saloon cars at £7,000 each (total of £21,000 over 12 years).

Assuming 7 new vehicles are licensed each year then the saving from not replacing the saloon cars is £147,000.

The Department for Transport also calculates that wheelchair accessible taxis will see a small increase in revenue and have assumed 1% on an annual turnover of £25,000 – giving a revenue increase of £250 per wheelchair accessible taxi.

We are not able to calculate the annual financial benefit to users, however it is believed that disabled users of taxis will have greater consistency and access to a taxi in Shropshire and thus we envisage they will make more trips.

Option Three. Require all taxis to be wheelchair accessible from a set date.

This would give certainty of a date by which the taxi fleet will be wheelchair accessible.

It is likely that such a policy would result in many taxi drivers and operators retaining their current vehicles until the last moment and then transferring to private hire. It is likely that such a policy will see a large reduction in the number of taxis within Shropshire.

Costs

Assuming all 90 currently non wheelchair accessible taxis will be replaced by an accessible vehicle equally over a five year phased introduction and the cost of a wheelchair accessible taxi is £25,000 then the annual replacement cost is calculated at £450,000.

Also assuming running costs for a wheelchair accessible taxi are circa £1,000 per annum more than a saloon car the annual increased running costs is £18,000.

Total £468,000 per annum.

Other Implications

As wheelchair accessible taxis tend to be less fuel efficient than saloons the total carbon emissions may increase marginally. In addition the greater emissions would attract a higher level of vehicle excise duty. This may be offset by the introduction of new vehicles into the fleet with lower emissions than those they replace.

Benefits

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We are not able to calculate the annual financial benefit to users, however it is believed that disabled users of taxis will have greater consistency and access to a taxi in Shropshire and thus we envisage they will make more trips.

Option Four. Use of financial incentives.

This option is that Shropshire Council give a financial incentive to encourage wheelchair accessible taxis.

Currently the cost of licensing a wheelchair accessible taxi is the same as for a saloon vehicle. Shropshire Council could introduce differential licensing fees with reduced costs for wheelchair accessible taxis.

The annual cost of renewing a taxi vehicle licence with Shropshire Council is £105. Reducing or removing this fee for a wheelchair accessible taxi would be only a marginal saving when compared to the purchase and running costs

differential when compared to a saloon car.

Costs

Assuming 7 new vehicles are licensed each year and the council waives the licence fee for wheelchair accessible taxis the cost to Shropshire Council would be £735 lost income.

Assuming running costs for a wheelchair accessible taxi are circa £1,000 per annum more than a saloon car, the annual increased running costs is £7,000 if the seven vehicles were wheelchair accessible.

Total £7,735 per annum.

Other implications

As wheelchair accessible taxis tend to be less fuel efficient than saloons the total carbon emissions may increase marginally. In addition, the greater emissions would attract a higher level of vehicle excise duty. This may be offset by the introduction of new vehicles into the fleet with lower emissions than those they replace.

Benefits

The Department for Transport calculates that wheelchair accessible taxis will see a small increase in revenue and have assumed 1% on an annual turnover of £25,000 – giving a revenue increase of £250 per wheelchair accessible taxi.

We are not able to calculate the annual financial benefit to users, however it is considered that the financial incentive that can be offered by Shropshire Council is unlikely to offset the costs of providing a wheelchair accessible taxi and therefore it will not on its own increase the wheelchair accessible taxi fleet.

Option 5; To remove entirely any requirement for Taxis to be wheelchair accessible.

This policy would remove any requirement for taxis to be wheelchair accessible.

Costs.

There are potentially no increased costs to the taxi associated with such a policy. Due to the significantly greater cost of a wheelchair accessible taxi over a non accessible vehicle it is highly likely that applications will only be received for non wheelchair accessible vehicles.

The existing fleet of wheelchair accessible vehicles may remain until the end of their operational life although as they have a greater second hand value and increased running cost over a not accessible vehicle there may be a move to change as soon as the policy was introduced.

Other implications

Such a policy would quickly reduce the availability of wheelchair accessible Taxis in Shropshire with potential accessibility impacts for ambulant disabled persons.

The policy could also place drivers who have gone to the expense of purchasing a wheelchair accessible vehicle at a financial disadvantage.

Benefits

This policy would remove a significant barrier to entry into the taxi business and thus may result in an increase in taxis within Shropshire. This could have a positive impact on addressing access issues particularly associated with the late night economy.

The policy is also likely to attract operators from private hire in taxis as the flexibility of operating a taxi is greater than for a private hire whilst the entry costs into the business would be the same.