

# THE NATIONAL PRIVATE HIRE ASSOCIATION



8 Silver Street, Bury, Lancashire BL9 0EX. Tel: 0161-280 2800 Fax: 0161-280 7787 Email: [npha@btconnect.com](mailto:npha@btconnect.com)

TO: Department for Transport  
DPTAC  
All local authorities - England, Wales and Scotland  
NALEO  
Institute of Licensing  
LACORS  
All industry stakeholders

REF: **Taxi accessibility survey – August 2010**

Dear Colleagues

We are pleased to announce that, after some ten weeks of phoning and emailing, the Taxi Accessibility Survey is at last complete. When we undertook this survey we did not appreciate the amount of questions that we would be asked by yourselves, which led to more figures being sought, more explanations being requested and more analyses being made.

The Excel file is attached to this email now has 18 sections, and we therefore need to send this letter of explanation to save you scratching your heads unnecessarily. Incidentally, the amount of statistics on each page is quite enormous; therefore the file is set to print out in A3 as an A4 version would be seriously hard to read.

## **Sections One to Six**

When we initially started our survey, it was prompted by talks with the Department for Transport and other stakeholders as to the effect of the amendments to Section 16 of the 1985 Transport Act contained within the Equality Act 2010. We sought from councils information as to whether they still regulated taxi numbers, or whether they had deregulated.

The response from local authorities clearly showed that there were four distinct categories that councils fell into:- Section One is a list of all those councils that still regulate or have re-regulated hackney carriage numbers, and which have a mixed fleet. These are the authorities which will be the target of the Section 16 amendment.

The second list of councils is made up of those that have deregulated, but have done so by restricting new entrants to the trade to the provision of wheelchair accessible vehicles, while the existing fleet of saloon cars was allowed to continue – in other words, maintaining a mixed fleet.

The third section is the list of councils that have either never regulated, or have deregulated with no specific conditions as regards wheelchair accessible vehicles.

The final section comprises those councils that already had a 100 per cent wheelchair accessible fleet, or which are working specifically toward that target. A number of these councils still regulate numbers, but because of their existing all-WAV fleets, section 16 amendments will not affect them.

Finally in Section Five, we decided to put in a separate sheet for Scotland.

On sheets One to Four we were able to obtain previous surveys done by the Department for Transport, and we were able to put in a range of figures from 1999 to 2007 and compare those with the figures provided by the councils on this survey.

We were asked whether the type of council – ie. city, borough, metropolitan borough etc. – was significant, so we put that in as well. We were asked whether the size of population in an area was significant, so we added those figures. Then we were asked whether the size of taxi fleets across the country had increased or decreased since 1999, and we put those figures in as well.

We then worked out the percentages of wheelchair accessible vehicles on the fleet and added that in. Sections One to Four therefore are pretty heavily laden with figures.

Section Five for Scotland was somewhat easier because we were only able to get the number of wheelchair accessible vehicles from 2007 onwards. But again we put in population, fleet sizes and percentage of increase or decrease.

Having done all of that, we were then able to provide a list of all those councils that are still regulated or re-regulated – 112 in all – and they can be found in Section Six.

### **Sections Seven and Eight – Analysis**

Sections Seven and Eight contain a breakdown of the information found in the first six sections. As you will be aware, much speculation has been going on about what percentage of fleets that the Government might be looking to set as a parameter for wheelchair accessible vehicles. In doing this survey, we gained the impression that those councils that have already reached 30 per cent or above WAVs were least likely to be affected by any change, and most likely to be able to reach an agreed percentage over a reasonable length of time.

We therefore drew a red line under the 30 per cent mark, and analysed section by section. I do believe that Section Seven will certainly raise some eyebrows; it certainly did when we presented the figures to DPTAC.

Section Seven is the analysis of the rise and fall of taxi plates since 1999. I personally was very surprised to see that nearly 12 per cent of councils in the country (37) have fleets that have reduced in size. In putting together these statistics, where the figures in a local authority raised an eyebrow we phoned the councils and asked for an explanation, and the responses will be found at the bottom of each sheet.

### **Section Nine**

This section examines the possible footprint of a local authority once a percentage of WAVs had been set. In doing this we ran out a sheet sorted by the number of wheelchair accessible vehicles in each area, and these lists will be seen further on in Section Twelve onwards.

The reason we did this was to pick out the first council on the list which fell below the 30 per cent mark. This happened to be Brighton and Hove. Brighton has a very large number of hackney carriages, some 528 at the moment, of which 124 are already wheelchair accessible. The trade was having a meeting about these percentages, and we sent them an analysis sheet.

We picked three percentages at random: 35, 40 and 50 per cent WAV level, so that we could show the trade that if, for instance, they had to get to 35 per cent, they could do that with no increase in their fleet, by they themselves changing 51 of their vehicles to WAVs. If however they were not prepared to do this, and the only way they could increase the fleet was by deregulating in favour of wheelchair accessible vehicles only, then they would need a further 90 vehicles to get to the required 35 per cent.

To get to 40 per cent they would need another 120 vehicles; and to get to 50 per cent they would need another 200. I will not go into an analysis of my thoughts on these matters, but I hope this gives you pause for thought.

### **Section Ten**

This is a runout of all licensing authorities in England and Wales in alphabetical order, with just the figures from 2010. You will see at the foot of this that the hackney carriage fleet in England and Wales has reached 77,588, of which 22,000 are licensed in London. We have given two sets of percentages, with and without the London figures, to show the percentage of WAVs across the board.

**Section Eleven** does the same for Scotland.

### **Sections Twelve to Eighteen**

You will recall that we were asked to put in the type of councils, and the populations, to see if they had any relevance. We had to think long and hard how to analyse this. As we have said, we sorted the whole of England and Wales from the highest number of WAVs to the lowest. We took two councils off – South Derbyshire and Broadland – because they do not license any hackney carriages. This left us with a list of 340 councils, which amazingly divided into four lists of 85 councils. This simple mathematical discovery, assisted by fingers on calculators, formed the basis of an analysis which was very interesting.

So we divided the country into four quarters: the top 25 per cent of councils obviously have the highest number of WAVs, and the last quarter has the lowest. But all four sections contain 85 councils.

In Section 18 you will see a summary breakdown of these sheets. I have to say that they were quite amazing: the top 25 per cent of the councils on the list have 40,858 wheelchair accessible taxis; the second quarter have 3,207; the third quarter 1,056; and the fourth quarter only 260 WAVs.

We then divided off on each sheet, as you will see, an analysis of the population of each of the quarters, the WAV percentage of each quarter, and the type of council that makes up

each quarter. I think that most people's expectation of the size and type of council is formally proved in these statistics – and indeed should give you all food for thought.

We hope that you enjoy going through these sheets, and if you do find any errors or omissions, do please advise us so that we can make amendments. Please however do not send in fresh figures merely because you have issued a few more licences since we contacted you. In fact, if we have to work through all these percentages again I will go bonkers!

However, depending on your feedback, and considering that the changes to the legislation are likely to take place next year, we might do an update at the same time next year.

We have had two requests now as to the number of private hire vehicles, and wheelchair accessibles amongst those fleets. In fact some councils have already sent us that information, but if it is available to you, then do send us an email and we will quite happily add a few more sheets to the survey as soon as we can.

This survey has been done in the interest of answering hundreds of questions which have been posed over the last few months by councils, the industry, and indeed Government. So please feel free to pass this on to anybody who might be interested. We shall be putting it on the ***Private Hire and Taxi Monthly*** website. Please feel free to put it on any website that you believe will be informative.

Under the Disability Discrimination Act very little happened in 15 years. Now that we have the Equality Act, let us see if we can make a difference.

Yours faithfully

For **THE NATIONAL PRIVATE HIRE ASSOCIATION**

A handwritten signature in black ink, appearing to read 'Bryan M Roland', written over a horizontal line.

**BRYAN M ROLAND**  
**General Secretary**