

### Representation to Tewkesbury Borough Council Converted Wheelchair Accessible Vehicle Applications

Our representation is based on the following;

1. The current PH vehicle policy and conditions have been in place for at least the last 15 years+. Businesses and the sector have shaped their businesses, their fleets, their contractual commitments and the employment of hundreds of staff upon these embedded operating conditions and custom and practice.
2. The Proposal has Severe financial impacts on the sector and means that such a rapid and sudden material change in licensing conditions is financially prohibitive. Each vehicle replacement can cost between £30,000 and £50,000 – with the industry needing to spend a minimum of circa £1.5m and £2m by April 2023 to accommodate this change – this is neither viable, possible, or justified.
3. Our businesses have contractual commitments that are based on the current licencing policies. These contractual obligations have 2, 3 and 5 year terms – materially changing the licensing conditions without sufficient adjustment periods, whilst operators are tied into long term fixed price contracts with Local Authorities, puts all operators businesses in jeopardy and makes the service provision financially unviable and has the potential to cause a material failure in this service provision.
4. Vehicles have already been inspected and deemed fully safe and appropriate to M1 standards by TBC's own nominated test centre. These vehicles all passed TBC's rigorous inspections in June and July 2022.
5. Our operational and vehicle safety record is exemplary. Our own business, operating for over 15 years, has never had a single safety related incident, we have never had a single passenger injury, and we have never had a single incident where the safety of our vehicle has ever been called into question. This is despite our vehicles being regularly audited (almost daily) and inspected by GCC and these undergoing a full VOSA MOT every 6 months.
6. There is currently a complete lack of supply of newer / replacement vehicles due to the Global Pandemic. There simply is not a viable supply of M1 large WAV minibuses in the market to meet these rapid changes. The global pandemic has hit the supply of all vehicles, causing years of delays in the supply of new vehicles. This has been felt even harder in the conversion market, where lead times are beyond 12 to 18 months for new vehicles, with backlogs still approaching 12 months.
7. Our sector provides essential daily transport to local residents who rely on our life enabling services to access education, respite, medical and care centres on a daily basis. Hundreds of passengers are using these Wheelchair Adapted vehicles every day, and without them they would have significantly reduced access to key and essential services.

We are not resisting change

We are not resisting long term advancements and developments in such policies. Our business alone has invested over £300,000 in the last 12 months on replacement vehicles that would meet such future licensing conditions - but we simply can not go any faster or further in such little time.

These proposals simply write off the industries entire fleet/s, rendering dozens and dozens of vehicles redundant, and needing millions of pounds of investment in just a matter of months.

Our businesses provides an essential service, in fixed price contracts, where the sector and the model is based upon today's current licencing conditions and has been shaped by these unchanged conditions over the last 15 years.

Moving to a future state is of course entirely possible, but this will need an appropriate amount of time for the industry and the sector to adjust, to find the £2m required, to find the supply of vehicles which is not currently available, and to see out their current fixed contractual obligations, based on today's current model and conditions.

So yes, this industry can adapt and change, and it is possible to implement these new licensing requirements, but please allow us the time, and an appropriate amount of time to do so.

Our alternative proposal

- That this policy applies from 30th April 2023 for all NEW VEHICLE applications

- Vehicles that hold existing PH licences must have passed a one off physical M1 inspection by a nominated garage and DVSA approved MOT test centre, as per the recent PDL examinations.

- These vehicles should then be allowed to continue in operation and be licensed by TBC until such a point that they are naturally replaced by the operator, providing of course they meet all road safety legislation, are MOT'd every six months, have a valid LOLER examination every six months.

- NEW VEHICLE applications and replacement vehicle applications needing to adhere to the new policy standards.

- If TBC feel it is essential to meet the future policy standard by an arbitrary fixed time period, then we would respectfully advise that in order to overcome the significant and very legitimate issues identified above, a minimum period of at least 2-3 years adjustment time for the sector would be required.

#### Communication and Engagement

This document is presented by GO Accessible Transport, who employ over 85 staff in the local area and provide critical transport services to hundreds of disabled and vulnerable passengers daily.

Further communication and engagement please contact

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