

Response to consultation Taxi and Private Hire Licensing Consultation

The proposed policies in this consultation (particularly around vehicle age and emissions), will have a significantly damaging impact on the essential public service for transporting children and adults within the Home to School Transport Sector, and Adult Centre settings. It will make hundreds of dedicated H2S transport vehicles redundant, force many local SME's to incur severe financial hardship and many will close, and this proposal will severely restrict the service provision in this essential area.

These policy proposals will also have significant cost implications for GCC providing H2S transport across the County. At a time when GCC is terminating all school contracts in an attempt to save money, this proposal will not just reverse any perceived savings, it will in fact add millions of pounds of capital investment requirements to this sector, which is simply not commercially possible or viable.

As an example, GO Accessible Transport operates 30 such (dedicated H2S) transport routes, employing over 65 staff and transporting hundreds of children and adults, with a wide range of disabilities and special needs. 100% of our private hire vehicles work on a dedicated basis for Gloucestershire County Council. They are very expensive and specialised vehicles, converted to transport passengers in wheelchairs and with severe mobility challenges, and work **exclusively** for GCC. These are NOT public facing, they are not fare paying vehicles and they do not undertake any other work. The vehicles are specified, procured and contracted by GCC for dedicated specialist transport.

Our consultation response has two clear options and proposals that we urge Tewkesbury Borough Council to consider and adopt.

1. An amendment to the Age and Euro Emissions proposed policy for Wheelchair Accessible Vehicles (WAV's)

And/or

2. The creation of separate 'Dedicated H2S' Vehicle Category for the sole provision of dedicated vehicles contract by Gloucestershire Country Council

1. An amendment to the Age and Euro Emissions proposed policy for Wheelchair Accessible Vehicles (WAV's)

We understand the desire to improve vehicle emissions and improve air quality, but this proposal is too far reaching and too quick. It puts Tewkesbury Borough Council out of sync with the rules imposed on public transport and bus companies, and places an unfair and unnecessary burden on operators, who are providing an essential community service.

There are three very clear risks and unfair impacts on this proposal

1. This proposal will make hundreds of perfectly good, safe and approved vehicles redundant, operators (SME's) will lose hundreds of thousands of pounds of existing fleet, and then need to invest millions in new fleet.
2. This will significantly reduce supply and significantly increase public service costs.
3. Even if operators do scrap perfectly good current vehicles, and invest millions in new Euro 6 vehicles, drastically increasing public services costs – it is then likely that and possible that only a few years later, they will then be forced to replace them all again with HEV and EV vehicles.

We therefore propose the following amendment to the age and Emissions Policy, for vehicles used exclusively on GCC contracts / Wheelchair Accessible Vehicles (WAV's)

That the proposed **Euro 6 requirement for RENEWAL WAV's is postponed and not adopted.**

We propose that only an upper age limit of 15 years old only is adopted for **RENEWAL WAV's** with no Euro 6 requirement (only Euro 5) This will have the same desired result, as vehicles that are currently 8 years old and newer will be Euro 6 by default (registered after Sep 2015), meaning that in only a further 7 years' time all renewals for Private Hire WAV's will then automatically become Euro 6.

This also means that operators would have much greater clarity on EV and HEV policy standard's and can work towards the true long term sustainable solutions rather than having to invest millions now, and then needing to invest millions again in just a few more years.

For extremely expensive (adapted and dedicated vehicles) such short fleet lifespans (and investment levels) is not commercially viable, fair or sustainable for operators or service users.

Enforcing what will be TWO major and full fleet replacements in this sector within a five- or six-year window is not practical, affordable or appropriate.

If Electric (EV) is the chosen long term future route, then this incredibly expensive, short term total fleet change to Euro 6 (for just a few years) makes no sense, and should not be implemented.

2. The creation of separate ‘Dedicated H2S’ Vehicle Category for the sole provision of dedicated vehicles contract by Gloucestershire Country Council

In a number of Local Authorities, it is now being recognised that the fleets that work on a dedicated and contracted Home To School Transport Service sits only within Private Hire Licensing as it needs to sit within some formal framework. It is the case that in reality these dedicated vehicles are not public facing, they are not open to the public to book or travel in and are in fact dedicated outsourced vehicles of the County Council, who if they operated themselves would not sit within any licensed setting.

It is therefore welcomed that a growing number of forward-thinking Local Authorities are now considering or creating a new Private Hire Vehicle Category **DEDICATED H2S VEHICLE**.

This enables Local Authorities to recognise the sector specific needs, the varying vehicle and fleet requirements, and legislate an appropriate set of policies for this sector. This in no way dilutes or changes the policies for the 90% of licensed vehicles that serve the general public as well as H2S, as these policies can be fully implemented, but it does create the right and appropriate framework for a dedicated H2S transport sector.

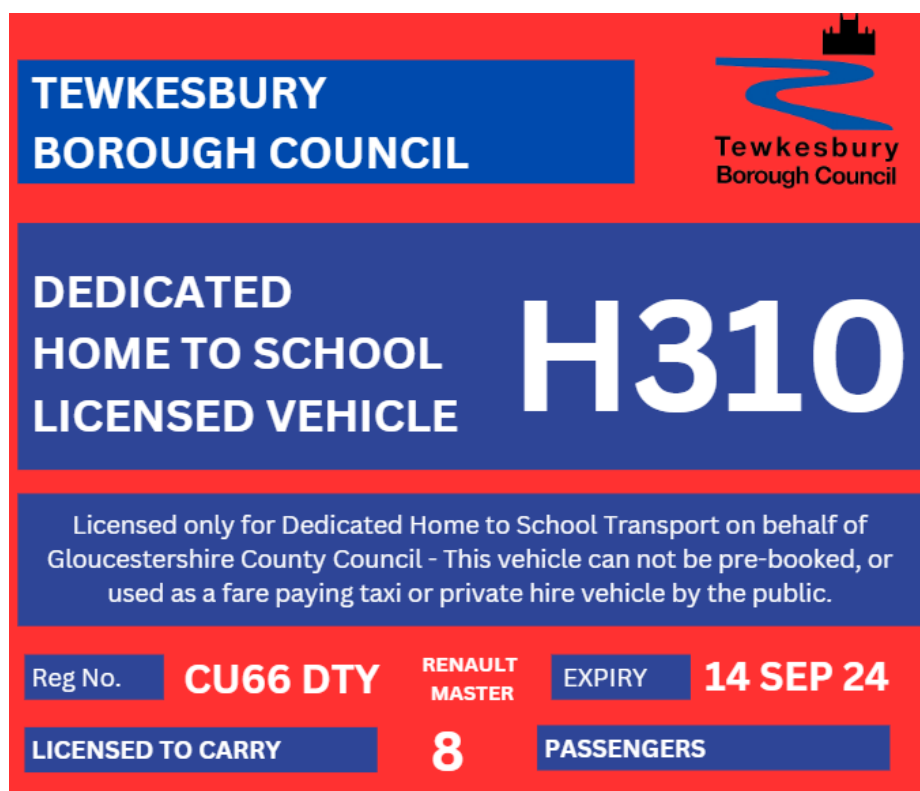
The benefits of such a category – DEDICATED H2S VEHICLE

1. Enables flexibility and a pragmatic approach to the essential and dedicated H2S service and will allow the County Council and Local Authority to work in partnership to set out affordable standards through tender specifications and procurement.
2. Enables GCC and TBC to adopt a set of appropriate standards and policies that deliver safety, cost appropriateness, supply of service, and also a clear direction of travel and long term aims for vehicle ages and emissions, whilst being realist with what the service and sector can afford and achieve.
3. This approach would not impact on the desired standards and policies for regular public fare paying taxi's and private hire vehicles as these can be continue to be implemented in line with the authorities desired proposals.
4. Adopting a cost appropriate and realistic set of policies for the H2S Dedicated Vehicles will ultimately save millions of pounds a year for the essential public funded transport service.
5. It will also enable GCC and TBC to develop an appropriate framework that could bring more much needed employees into the sector, increase overall supply and make the sector more reliable and sustainable.

Managing a Dedicated H2S Vehicle Category

The management and enforcement of this new category would be relatively simple. We would propose the following;

1. An operator must be approved for this category (Dedicated H2S Vehicle) by both GCC and TBC – demonstrating they operate within the dedicated H2S sector and confirming such vehicles only operate on a dedicated basis.
2. GCC would advise how many contracts an operator has, and a tolerance level for spare vehicles and contingencies be applied to arrive at their maximum number of vehicles.
3. An operator would sign a legally binding agreement and operators licence stating the specific conditions of a DEDICATED H2S VEHICLE licence. This would primarily guarantee and ensure that the vehicle would only ever be used on a dedicated GCC contracted H2S route, and would never operate outside of this scope.
4. Once a vehicle is licensed as a DEDICATED H2S VEHICLE it would be issued with a clearly identifiable PH licence Plate, and vehicle stickers which must be displayed. This would ensure it is easily identifiable as dedicated contracted service vehicle i.e. Dedicated H2S VEHICLE and not for public fare carrying work.



Summary

We completely understand the desire to reduce vehicle age and emissions, but we strongly suggest that now is not the right time to push dedicated and expensive Wheelchair Accessible Vehicles off the road, spend millions upgrading to Euro 6 (which no operator can afford to do) only to then upgrade again to HEV or EV within a few more years. The sector and GCC simply can not afford this approach.

It is right to understand the differences of a dedicated H2S WAV fleet and support this sector to achieve a longer term, more sustainable pace of change to towards a fully electric solution from 2030/3 onwards.

This sector is under huge downward cost pressure from GCC, and implementing this policy will have the polar opposite effect, increasing operational costs by millions per annum, significantly reducing supply and having a huge financial impact on dozens of SME's.

We urge Tewkesbury Borough Council to adopt our proposals, and engage with us and other operators to discuss a sustainable and affordable road map for the future.

Richard Caine

Managing Director

GO Accessible Transport