

From: Action for Yorkshire Transport [REDACTED]
Sent: 20 March 2025 07:29
To: Gareth Bentley [REDACTED]
Subject: Wheel Chair Accessible Taxis in North Yorkshire

I am contacting you on behalf of Action for Yorkshire Transport, an independent group of over 40 members, who campaign for better transport across West and North Yorkshire.

We have followed the debate about increasing the number of wheelchair accessible taxis in North Yorkshire and are aware how this compares with the situation in West Yorkshire. We are concerned that a significant number of people find it difficult to travel in North Yorkshire because they need a wheelchair and appropriate taxi. This difficulty leads to isolation as well as problems in accessing services most of us take for granted we can travel to.

Not all taxis are going to be wheelchair accessible and we need a balance financially as well as environmentally. But a significantly higher proportion of wheelchair accessible taxis is needed, perhaps upto half the fleet. We hope for the benefit of those who need improved facilities that the North Yorkshire Council can make a significant improvement in this area.

Thanks,
Action for Yorkshire Transport
<https://actionforyorkshiretransport.org.uk/>

1. Principles behind WAV.

Wheelchair accessible vehicles are designed to provide safe and secure accessible entry for wheelchair users. It goes without saying that everyone in the taxi trade should know this.

These vehicles are often fitted with a ramp or a lift at the rear or the side of the vehicle. On the rare occasion that they are supplied, winches are sometimes incorporate into the design.

The wheelchair and its user are held in place with a manual and on occasions, an automatic, security mechanism. The wheelchair user **MUST** face forward accept the side loading vans which are all rear facing.

These vehicles are designed to prioritise safety within the vehicle, using tie downs, seatbelts and restraints. These are designed to protect users in the event of an incident or a sudden stop.

The majority of the currently manufactures WAV's have a lowered floor or a built-in extendable ramp. These ramps limit the space for other passengers regarding luggage (please examine my particular vehicle if you need an example of this)

2. Principles behind EV

Electric vehicles use an electric motor and rechargeable batteries to run, the batteries are charged using electricity from a power outlet. Green and environmentally friendly but still with limited range

3. Concerns about WAV

As a WAV HCV owner/operator, my 7 seat Ford Tourneo taxivan has a retractable ramp fitted, the ramp itself is excellent if the passenger isn't heavier than 14 stones, the wheelchair isn't wider than 17 inches and you have 5 metres for loading and unloading.

The ramp is 3 metres, an average wheelchair is another 1 metre, and you need another metre for the position of the person responsible for pushing the wheelchair up the ramp. I am happy to demonstrate this to all of you whenever you require it.

4. Concerns about EV

The biggest concern about electric vehicles is charging costs, currently an overnight charge is on average £13 per night. Cheap in relation to my Euro 6 taxi that costs me about £40 a day. However! My £40 a day will get me to Heathrow, Gatwick, Stansted and on 5 occasions the Port of Southampton. There isn't one EV available as a taxi that will do that without stopping and charging. Parliament themselves stated in the house last year 'that the UK government has not met its targets for EV chargers throughout the UK and that there are not enough charging points'

The Government missed its targets of installing 6 fast chargers at every motorway service station by the end of 2023, and they still haven't met target at the end of 2024. This is well documented on various web pages.

Also, Parliament stated recently that the availability of public charge points is affected by outdated and disproportionate planning regulations, with local councils delaying planning by up to 11 months as inadequate locations can be found.

The competition and markets authority estimated that the UK will need 470,000 public charge points by 2030, currently there are only 73,334 charging devices in the UK, and this INCLUDES 14,448 fast chargers.

5. Earning issues WAV

I have been talking about this issue for several months with other drivers, and the main concern here is simply loss of earnings.

I am going to digress here as an ex-bus driver and son in law of a long-term wagon driver. When a wagon driver/coach driver starts his or her shift, they get paid from start to finish, even if they are off the tachometer and loading luggage or goods, they are classed as working and rightly so, continue to get paid for the work that they are doing.

Taxi driver – I'll use myself as the example here.

Open tailgate, climb inside and unlock the wheelchair ramp, release the ramp from 3 locking devices and pull out as required. Lock the ramp into position and fix the restraining straps and seatbelt holders as required. Manoeuvre and place the wheelchair onto and up the ramp and then secure the wheelchair into position. Depending on the model of vehicle, spare wheels need to be moved, and rear seats may need to be repositioned. Double check all fixings and proceed with the journey. Let's say the normal fare is £5.60 from Selby James St Taxi rank to Selby Hospital. At the hospital we have to find an adequate space to unload, I've already stated I need 5 metres minimum, you can never get outside the council offices in Selby due to the lack of parking restrictions, also we are not allowed to use the disabled bays (unless wheelchair user has a blue badge) and even then we are manoeuvring wheelchair users into ONCOMING traffic around a reasonably busy roundabout.

Loading a wheelchair in my vehicle takes 15 minutes and unloading takes approx. 12 minutes, that is 27 minutes. We are legally not allowed to charge for those loading and unloading times, however! In the eyes of the law, regardless of whether we are self employed or not, we must still earn a minimum wage of £12.21 an hour from 2025. Therefore, a proposed minimum fare needs to be implemented for loading and unloading under the National Minimum Wage Act of 1998.

6. Earning issues EV

I have, and never will own a fully EV as a taxi or PH vehicle, because they are not practical for the journeys that I do. My HCV is just over 4 years old, and I have done 270,000 miles in it. According to the SMMT (society of motor manufacturers and traders) the average range on a single charge is 236 miles in ultimate conditions. Selby to Manchester airport is 180 miles without hold ups, no radio, no Air Conditioning, fully loaded with passengers. Ade's brand-new Tesla can do it, but he has to charge as soon as he gets back to Selby, It's not unknown for me to do 3 or 4 airport transfers in a day. It would be financially negative to have an EV with the mileage that I do, simply because I would spend more time charging the vehicle than driving it. Again, according to the SMMT, an average EV battery is expected to last 100,000 miles – 19 months in my case. This doesn't include the batteries natural declination of charge. The current prediction is that EV batteries will eventually last a minimum of 10 years, but this technology isn't yet available.

7. Costs WAV.

Ford Tourneo Custom (mine) £68000

Ford Tourneo Connect £33000

Peugeot Partner £37000

Citroen Berlingo £29000

Ford Freedom £36000

VW Caddy £33000

Ford Independence £45000

Renault Autograph £40000

These are all new OTR prices

All above are standard WAV and then they need to be made HCV ready. Meters and Pods, grab rails and side steps can add £1500 to these plus the plate fees and tests to get them on the road, before a driver has even earned a single £1.

8. Costs EV.

The most affordable EV that I could find brand new was £17995 and this could theoretically be used as a HCV but you'll not see me in any vehicle that you can't put 4 passengers, 4 cases in for an airport transfer. The NEW Ford Tourneo PHEV is £78000 HCV ready from Allied Mobility/Cab direct, put that in perspective that is £1280 per month over 60 months with a minimum deposit, this is just not affordable for the majority of HCV drivers in any part of the UK. A used LEVC black cab TX4 is £53000 with 28000 miles on the clock. Again, just not affordable.

9. Risk assessment WAV

When I first got my WAV, SDC made me find a company to do a full 1-day risk assessment. This was done and completed by Mines Rescue in Knottingley at a

cost of £280, this gave me a comprehensive guide, not only to using the ramp, but also the knowledge to identify all risks and hazards as far as is reasonably practical and to put appropriate control measures and safeguards in place to mitigate the risks and hazards identified.

There were 8 risks identified.

Under the Activity - Movement, loading and unloading of wheelchair passengers from kerb into a private taxi

I had/have to understand the following

- Contact with moving vehicles (James st Selby is a RED danger area rated 25 out of 25)
- Wheelchair falling from the ramp, Please Google Arriva Snaith Wheelchair refusal after incident with driver, falling from ramp.
- Manual handling/pushing/pulling – this is a risk factor of 20/25 under Musculoskeletal injuries.
- Slips, trips and falls from obstacles and conditions underfoot.
- Contact with vehicle roof (some wheelchairs have fixed headrests)
- Unsecured wheelchairs in vehicle whilst driving.
- Wheelchair tipping when moving off kerb.
- Wheelchair tipping when moving onto the kerb.

These were all adjudicated under ISO 7176-8 2014.

10. Use of WAV and restrictions

Obviously ALL drivers will need to undertake the WAV test, currently carried out by Green Penny, however with regards to the Risk Assessment that I was instructed to do by SDC in December 2020, I feel it a must that a NYC purpose built risk assessment and training course is carried out, so that every driver completes this as part of their applications. (New applications only) I also believe that as it's a government policy and it's NYC that is trying to implement the new car policy, so I feel that NYC need to also pay for this training course/scheme and class it in the same league as a NVQ, I am sure there is plenty of funding available. The skills network in Selby will be able to help and advise NYC licencing teams about this.

11. How many Wheelchair users are there in NYC - a question I have been asking for over 5 years.

Yes! I have asked this question on numerous occasions, and I always seem to get the same answer. 'We don't have those figures to hand' even though NYC have got a health and social care team, and these figures are on the .gov website.

Let me enlighten you. There are approximately 1.2 million wheelchair users in the UK, this equates to 11% of the total number of people with disabilities in the UK.

Most wheelchair users are over 60.

Less than 8% of people with disabilities use a wheelchair.

So, if we convert that to NYC then there's a population of 623501 in North Yorkshire of which 7476 could, theoretically be wheelchair users.

If my calculations are correct using NYC own figures, then the recommended figure, as laid out by the government, is 10% of taxis should be wheelchair accessible. NYC is 9% so only 9 WAVs short of a full house.

12. VAT

The majority of WAV's are VAT inclusive and a wheelchair user can get VAT relief on adapted motor vehicles for disabled people and charities under the VAT notice 1002. I'll point you towards the .gov website

<https://www.gov.uk/guidance/vat-relief-on-adapted-motor-vehicles-for-disabled-people-and-charities-notice-1002#sec11>

This should also apply to drivers who are buying WAV for taxi usage under direct orders from NYC. At this point, NYC will need to make sure ALL HCDs are VAT registered and will need to increase the fares accordingly by a further 20%.

13. Why only HCV - PHV should also comply

Why is the PHV fraternity being allowed off with this, am I led to believe that it's because 400 licensed UBER PH vehicles will be working in NY areas A-G within a few weeks and they won't be made to have WAV or EVs, this is discrimination against the HCV fraternity.

14. It was originally discussed Hybrid and Euro 6.

Why, after an executive meeting and a further meeting with Cllr Tim Grogan and Barbara Brodigan, where Mr Richard Fieldman and myself discussed the alternative options of Hybrid vehicles and Euro 6 engines, has it suddenly been decided that these 2 far better alternative options are not part of the consultation process, and we still haven't seen an unmet survey as was suggested initially.

15. Age of drivers and ongoing health issues.

Due to limiting costs, we are not seeing a new market of young, fit, healthy taxi drivers coming onto the streets. Most of these drivers are, or have been, licenced for many years and are of a certain age and fitness that pushing a wheelchair user into a WAV is practically impossible. I have 1st hand experience of wheelchairs, my 1st wife was a wheelchair user after cancer surgery and I can assure you all, that pushing her around Selby and York was not an easy task for

me when I was 25-30 years old. I am now 56 years old, and I would not want to go through that scenario again.

16. Not insured to help users into or out of their homes, a full care team will need to be implemented and ready and waiting at customers pick up points to assist them until they get to the WAV.

I have checked with my business insurance and the legal team at the federation of small businesses, they are quite adamant that Taxi insurance regardless of 3rd party liabilities, is only applicable within the confines of the vehicle, so when we get asked (as has done previously), drivers are not permitted to help a person within the confines of their own grounds, therefore the wheelchair user will need to arrange a carer or care supply team to be available to help the drivers to and from the vehicle, this takes the liability away from the 'where there's a claim' scenario.

17. UNMET survey must be completed for ALL 7 areas of NYC.

During our meeting with Cllrs Grogan and Brodigan it was agreed that an Unmet demand survey, paid by the trade, focussing on the needs of disabled passengers should be carried out.

18. WAV must remain free of licensing fees throughout their plated existence, less income generated for NYC.

NYC have always stated that WAVs will be free from licencing fees, however if NYC are to implement that all new vehicles are to be WAV/EV are you going to continue to make it free for the lifetime of the vehicle. Of course, this would heavily reduce the income generated by NYC and drivers like myself that currently get free licensing every year, will be made to find even more money to fund their vehicles.

19. On board incidents – safeguarding.

The current training is totally inadequate, currently it only covers wheelchair usage, it fails to cover all other disabilities, such as Autism, deaf, blind, ADHD, Aspergers, mobility, mental and not forgetting other disabilities such as Intellectual, dwarfism, MS, HIV. The list is too long, but I think you get the idea. However, by bringing in a WAV bylaw, you are discriminating against able bodied persons and persons with non-wheelchair required disabilities. I know 100% that I lose business from my corporates because certain passengers do not like riding in my taxi, because the ramp rattles. And no amount of adjustment will stop it, and I can't cable tie it as I have no way to release it if required, unless I carry scissors or similar. I am happy to pass on details of my passengers who refuse to use my car over Oscars BMW, or Richards Mercedes Van, all because of a rattle. I also have a young lad with autism who must wear

ear defenders as the constant tick of my ramp causes him to become incredibly agitated.

20. ALL Ranks need upgrading

WAV will need drop kerbs, safety barriers, driver barriers, no inclines (must be flat) lined accordingly 5m minimum between cars unless side loading, they will need to have inflatable risers in case of Wheelchair spillages or carers as required. All hospitals, Dr surgeries, other health clinics will need to have safe and secure designated loading and unloading for WAV passengers, ALL WAVs must be given a general use Blue Badge for supermarket, town centre, car park etc disabled bays for safe and secure loading and unloading.

EVs will need to have charging points at all ranks so that drivers can charge their vehicles whilst waiting on rank, this will also mean that current street furniture will need to be moved to make way for dropped kerbs, tactile paving will need to be installed and where applicable disabled parking bays will need to be removed and reinstated elsewhere.

I have been in communication for over a year with Gary Lumb Area 7 forward planning who has stated (and we are working on it) that James Street Selby is not fit for purpose as it stands, due to the increase in traffic using what is ultimately a side road. I believe plans have been submitted to improve James St in Selby. Driver and passenger risk is of the utmost importance, as stated in NYC byelaws, NYC must designate a safe working environment for taxis, their drivers and their passengers. We will need a full and comprehensive Risk Assessment to be carried out on every rank location throughout NYC.

The majority of drivers realise that the council, not only have an obligation to the disabled community, but also to the rest of society in enabling them to access a suitable vehicle for their needs, and at the same time allowing licensed drivers the choice of cost-effective vehicles to ply their trade. Anything less will be open to a challenge in court.

The government want a target of 11% of all taxis in the UK to be wheelchair accessible, we are not London where all 15,100 black cabs are WAV, this was TFLs conditions for fitness in their last policy. This is North Yorkshire, where villages have hills, tight bends and small narrow country roads, this is North Yorkshire where taxis in general are few and far between due to the current market conditions, the nighttime economy in Selby and York is non-existent. I sat on Selby rank Saturday 8th February from 6pm until midnight, I did less than £40. Not only is this trade becoming difficult to work but it's becoming unaffordable and with NYC insisting on the trade having unaffordable vehicles, either the Hackney trade will be desecrated, allowing Uber PH to take over, of course this means licencing teams won't have any jurisdictions on who is working the area, or those that want to continue in the trade will have a big enough network of clients to be able to swap from HCV to PHV.

Mainline Taxi Association// Blue line /Central//Spa Taxis

April 22, 2025

North Yorkshire Council

Ref: Inclusive Service Plan

For the attention of the licensing committee

Dear North Yorkshire Council licencing committee.

Please find enclosed the driver's response to the Inclusive service plan submitted by yourselves during this period of consultation.

We would respectfully ask for your answers and thoughts moving forward before any decisions are made that will affect our trade.

Yours sincerely. **The following companies. Mainline / Blue line / Central / Spa.**

1/

We are writing to seek clarification and express concerns regarding the 21-page inclusive service plan for 2025. We assume this document's purpose is to represent disabled individuals' needs in our service provision accurately.

Could we start at

Page 3. Points 6/7/8

We begin with point 6, which indicates that 17.7% of England's population is disabled, according to the 2021 Census.

Question: Does this percentage refer to individuals who require a wheelchair or mobility scooter for movement or does it include all disabilities, including those who can comfortably use a saloon car and a foldable wheelchair? This question pertains to points 6, 7, and 8.

Point 9

Due to the lack of official statistics, there is little point going back to 2018/2019. The trade strongly believes that together we can all learn from past mistakes. We would like to point out how this problem arose, at least locally in Harrogate and Knaresborough.

We want to take you back to 1990-91, a remarkable time for growth in the availability of WAV cars in Harrogate and surrounding area. The reason was the government's action instructing councils to issue the WAV hackney plate. The plates were to be issued regardless of any capped numbers maintained by councils on Hackney numbers.

The government of the day knew that Hackney plates exchanged hands for thousands of pounds between drivers looking to have the right to ranks and flag downs,

Fifteen WAV plates went to the trade in the Harrogate borough. The trade experienced a upturn in business from having these vehicles especially through school contract's and gradually the disabled as they learned that some offices had invested in WAV vehicles making them more readily available for bookings. Steadily over the next few years wav business began to build, as confidence grew among our local population who required a wav service and the companies that could afford to invest in such vehicles.

2/

That was until the little red bus decided to get in on the act. While this may have started as a well-intentioned help in the community, it quickly turned into a door-to-door service, as word spread that LRB could take you for a fraction of the cost of your doctor's hospital appointments and you could also book returns.

However, this also turned into door-to-door service in smaller vehicles and people being taken to pubs social clubs golf clubs and so on with return booking taken. They also went after school contracts especially WAV type vehicle required.

The trade made several attempts to complain through the licensing office to start with despite the investment companies had put in to provide WAV availability. (LBR) Were effectively operating as a private hire car would without the expense of licensing the under 9 seat vehicles for that purpose. Despite the complaints from the trade, they were allowed to continue unabated up to the time they went into liquidation According to the BBC.

By this time, the taxi and private hire trade had rolled back its investments in WAV sold a proportion of its wav stock. The offices could not compete with a company such as L.R.B, With its many avenues of subsidies and grants.

However, despite losing substantial money from their investments in WAV Vehicles, the trade tried to rally. Other companies purchased WAV vehicles, and approached HBC for an issue of WAV hackney plates. Only to be told there was no evidence of a shortage of such vehicles, it would almost 9 years before they would issue these plates.

During those years the question was asked over and over again at taxi liaison meetings the answer was always the same there was no evidence of the need for more WAV cars, but we could place them on

Despite numerous requests over the years following, the answer was always the same. There was no evidence of a shortage of WAV cars, even after the disability council had said in a meeting with the trade and the licensing office that this was not the case.

There was and still is truth be known and uneasiness when the trade is confronted by what could quickly take as an ultimatum, in fear of what may follow if we all invest because we have to, if LBR becomes active again or another such company comes to do the same.

3/

Yet with this paper, the trade is being blamed, with a shortage of such proportions, the possibility of decimating the hackney or the private hire to play catch-up. It is essential to remind everyone that in the past 5 years, we have suffered not only COVID-19 and lock down but also a hoard of non-NYCC licensed vehicles, mainly under the banner of Uber combined with other West Yorkshire company logos.

During COVID-19 and lockdown, it is good that we remember the drivers and operators who kept active service on the phones and in the cars. They were local licensed drivers and offices, who without there would have been many people isolated and unable to get help with food and medical.

Despite the risk to their safety, they have helped by working through COVID to provide mainly the only transport available.

Many drivers left the trade during and after COVID-19 due to ill health or fear of contracting it. Fleets found themselves with as many as 30% of driver numbers down. To put that in lost revenue terms, (£5,000pw) and (£20,000) pm based on a 42-week rent paid per year.

Then, we saw the unification of North Yorkshire. Many drivers lost their investments in Hackney plates, dropping from, in some cases, £25,000 to 0 in a day.

The offices are feeling the pinch again, with higher bills for NIC and the cost of vehicles since the end of lock down, not to mention every other bill connected with our trade, including licensing.

Like the government, we are not bottomless pits of money. We are local people who look after visitors and the locals who choose to use our services in a fair and honest way.

Now, back to the inclusive service plan

The estimate is that there are 1.37 million users of wheelchairs and powered mobility scooters in England. We then see in point 10 that this represents approximately 2.4% of the population. Which again represents approximately 15,000 people if we apply the 2.4 % to North Yorkshire.

Actual figure based on the % would be 14,770 Which would mean those 67 licensed wav cars you speak of would mean we only had 1 WAV per 220 member of NYC wheelchair and Mobility Scooter user.

Question: 1: Does this percentage refer to individuals who require a wheelchair or mobility scooter for movement? Or does it include all disabilities, including those who can comfortably use a saloon car and a fordable wheelchair?

Question: 2: Realistically, would this also count the people who have mobility vehicles also?

Question: 3: Given that just of the mobility scheme companies in England (Mobility Operations ltd) has delivered the mobility scheme to over 800,000 disabled people across the UK. Would it be fair to say that not everyone who is disabled will require a WAV vehicle all the time to get from A to B?

4/

Moving to page 5. POINT 17

Quote: To improve the access availability of licensed vehicles. Should this read WAV-type vehicles? There is no need for inclusion for non-disabled people, as this would only serve to discriminate and remove the choice of the rest of NYC population. This with the greatest of respect would not be considered inclusive for all.

Instead, we need to focus on the realistic numbers of people requiring the WAV service. Allowing through real consultation between NYC the trade and the disabled community of North Yorkshire. There is much made of WAV business opportunities and operator's making good returns on their investments in WAV stock. If this is a result of contracts, please remember while on contract your vehicle is not free to answer other bookings especially asap.

Page 6. /21. Last paragraph

The page makes your job and ours so much more complicated. Giving get-out-of-jail-free cards. A driver must pass a medical when obtaining their license. If a driver has an injury during his/her life, then a temporary exclusion from WAV work would be acceptable.

However, if it becomes permanent or long-term scenario, they must change the vehicle type if they drive a WAV. Otherwise, they will have a free plate without ever doing WAV work.

Page 8

.27. Duties placed on licensed private hire operators to protect the rights of disabled people to access private hire services.

Service providers?

Questions:

Does this apply to all PHs/operators regardless of whether they have a WAV vehicle?

And could you please define your ideas include in the words (reasonable adjustments?)

While we agree that more WAV vehicles are necessary, your figures show that the problem is less severe than your inclusive plan suggests. We should be looking to improve the number of WAV per WAV user and not by the total headcount of everyone living in North Yorkshire.

Before presenting our suggestions on increasing the number of WAV cars without adversely affecting the rest of the trade, we have a few more points to address.

5/

When you say the council has broad discretion over the type of vehicle it may license.

We would ask for a list of these cars before any decision referring to WAV Vehicles and closer consultations before you decide you know more than those on the trade do about what is or is not suitable for the job. After all, there are not that many of us at present. However, we currently have at least 50 years or more of WAV vehicle experience between the providers.

Page 11, point 60.

Service providers. A group of local service providers jointly contribute our thoughts to the inclusive service plan.

Our information is first-hand, built on experience and at our expense.

We know the costs involved in running and maintaining WAV cars and buses.

We are also very aware of the trouble getting full-time drivers for these cars and buses and the reasons why.

We have years of first-hand knowledge of our vehicles' limits and maintenance expenses.

We would like to make one suggestion: Would you consider a third license?

One that is for a driver of only a WAV taxi or private hire. By this, we mean there is, we think, a large market out there of middle-aged folk looking for something to do.

Mostly part-time, however, the cost of licensing is often the biggest expense when combined with the time it takes to license in the first place.

Would the council think about a free-of-charge driver's badge only to be used with WAV vehicles? As a company, we feel sure that the cost of the training and tests now available by disability action Harrogate could be met by the companies if North Yorkshire cover the rest.

This could give us in North Yorkshire an as-yet-untapped source of drivers to take up WAV cars provided by the offices and individuals who may choose to have a second driver

Thank you for taking the time to read our thoughts.

Signed by all on the following sheets

Mainline /Central / Spa/ Blueline Directors on behalf of their shareholders.

At the time of getting these signed we have some 45 more driv4ers on holiday or on term sick

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Now, back to the inclusive service plan

The estimate is that there are 1.37 million users of wheelchairs and powered mobility scooters in England. We then see in point 10 that this represents approximately 2.4% of the population. Which again represents approximately 15,000 people if we apply the 2.4 % to North Yorkshire.

Actual figure based on the % would be 14,770 Which would mean those 67 licensed wav cars you speak of would mean we only had 1 WAV per 220 member of NYC wheelchair and Mobility Scooter user.

Question: 1: Does this percentage refer to individuals who require a wheelchair or mobility scooter for movement? Or does it include all disabilities, including those who can comfortably use a saloon car and a fordable wheelchair?

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We would ask for a list of these cars before any decision referring to WAV Vehicles and closer consultations before you decide you know more than those on the trade do about what is or is not suitable for the job. After all, there are not that many of us at present. However, we currently have at least 50 years or more of WAV vehicle experience between the providers.

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We have years of first-hand knowledge of our vehicles' limits and maintenance expenses.

We would like to make one suggestion: Would you consider a third license?

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CENTRAL TAXIS & SPA TAXIS

Appendix G
BADGE
NUMBER

PRINT NAME

SIGNATURE

PRINT NAME	SIGNATURE	Appendix G BADGE NUMBER
[REDACTED]	[REDACTED]	626
[REDACTED]	[REDACTED]	433c
[REDACTED]	[REDACTED]	422c.
[REDACTED]	[REDACTED]	332c
[REDACTED]	[REDACTED]	154c
[REDACTED]	[REDACTED]	594
[REDACTED]	[REDACTED]	307
[REDACTED]	[REDACTED]	462c
[REDACTED]	[REDACTED]	167
[REDACTED]	[REDACTED]	505
[REDACTED]	[REDACTED]	060
[REDACTED]	[REDACTED]	485
[REDACTED]	[REDACTED]	0272
[REDACTED]	[REDACTED]	517
[REDACTED]	[REDACTED]	58
[REDACTED]	[REDACTED]	229.

Mainline Taxi Association// Blue line /Central//Spa Taxis

April 22, 2025

North Yorkshire Council

Ref: Inclusive Service Plan

For the attention of the licensing committee

Dear North Yorkshire Council licencing committee.

Please find enclosed the driver's response to the Inclusive service plan submitted by yourselves during this period of consultation.

We would respectfully ask for your answers and thoughts moving forward before any decisions are made that will affect our trade.

Yours sincerely. **The following companies.** **Mainline / Blue line / Central / Spa.**

1/

We are writing to seek clarification and express concerns regarding the 21-page inclusive service plan for 2025. We assume this document's purpose is to represent disabled individuals' needs in our service provision accurately.

Could we start at

Page 3. Points 6/7/8

We begin with point 6, which indicates that 17.7% of England's population is disabled, according to the 2021 Census.

Question: Does this percentage refer to individuals who require a wheelchair or mobility scooter for movement or does it include all disabilities, including those who can comfortably use a saloon car and a foldable wheelchair? This question pertains to points 6, 7, and 8.

Point 9

Due to the lack of official statistics, there is little point going back to 2018/2019. The trade strongly believes that together we can all learn from past mistakes. We would like to point out how this problem arose, at least locally in Harrogate and Knaresborough.

We want to take you back to 1990-91, a remarkable time for growth in the availability of WAV cars in Harrogate and surrounding area. The reason was the government's action instructing councils to issue the WAV hackney plate. The plates were to be issued regardless of any capped numbers maintained by councils on Hackney numbers.

The government of the day knew that Hackney plates exchanged hands for thousands of pounds between drivers looking to have the right to ranks and flag downs,

Fifteen WAV plates went to the trade in the Harrogate borough. The trade experienced a upturn in business from having these vehicles especially through school contract's and gradually the disabled as they learned that some offices had invested in WAV vehicles making them more readily available for bookings. Steadily over the next few years wav business began to build, as confidence grew among our local population who required a wav service and the companies that could afford to invest in such vehicles.

2/

That was until the little red bus decided to get in on the act. While this may have started as a well-intentioned help in the community, it quickly turned into a door-to-door service, as word spread that LRB could take you for a fraction of the cost of your doctor's hospital appointments and you could also book returns.

However, this also turned into door-to-door service in smaller vehicles and people being taken to pubs social clubs golf clubs and so on with return booking taken. They also went after school contracts especially WAV type vehicle required.

The trade made several attempts to complain through the licensing office to start with despite the investment companies had put in to provide WAV availability. (LBR) Were effectively operating as a private hire car would without the expense of licensing the under 9 seat vehicles for that purpose. Despite the complaints from the trade, they were allowed to continue unabated up to the time they went into liquidation According to the BBC.

By this time, the taxi and private hire trade had rolled back its investments in WAV sold a proportion of its wav stock. The offices could not compete with a company such as L.R.B, With its many avenues of subsidies and grants.

However, despite losing substantial money from their investments in WAV Vehicles, the trade tried to rally. Other companies purchased WAV vehicles, and approached HBC for an issue of WAV hackney plates. Only to be told there was no evidence of a shortage of such vehicles, it would almost 9 years before they would issue these plates.

During those years the question was asked over and over again at taxi liaison meetings the answer was always the same there was no evidence of the need for more WAV cars, but we could place them on

Despite numerous requests over the years following, the answer was always the same. There was no evidence of a shortage of WAV cars, even after the disability council had said in a meeting with the trade and the licensing office that this was not the case.

There was and still is truth be known and uneasiness when the trade is confronted by what could quickly take as an ultimatum, in fear of what may follow if we all invest because we have to, if LBR becomes active again or another such company comes to do the same.

3/

Yet with this paper, the trade is being blamed, with a shortage of such proportions, the possibility of decimating the hackney or the private hire to play catch-up. It is essential to remind everyone that in the past 5 years, we have suffered not only COVID-19 and lock down but also a hoard of non-NYCC licensed vehicles, mainly under the banner of Uber combined with other West Yorkshire company logos.

During COVID-19 and lockdown, it is good that we remember the drivers and operators who kept active service on the phones and in the cars. They were local licensed drivers and offices, who without there would have been many people isolated and unable to get help with food and medical.

Despite the risk to their safety, they have helped by working through COVID to provide mainly the only transport available.

Many drivers left the trade during and after COVID-19 due to ill health or fear of contracting it. Fleets found themselves with as many as 30% of driver numbers down. To put that in lost revenue terms, (£5,000pw) and (£20,000) pm based on a 42-week rent paid per year.

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MAINTENANCE DRIVERS

Appendix G

Badge number

Driver name Print + signature

PRINT NAME

SIGN

BADGE No

[REDACTED]	[REDACTED]	348C
[REDACTED]	[REDACTED]	273C
[REDACTED]	[REDACTED]	447C
[REDACTED]	[REDACTED]	552C
[REDACTED]	[REDACTED]	098C
[REDACTED]	[REDACTED]	204C
[REDACTED]	[REDACTED]	286C.
[REDACTED]	[REDACTED]	046
[REDACTED]	[REDACTED]	075
[REDACTED]	[REDACTED]	005
[REDACTED]	[REDACTED]	111
[REDACTED]	[REDACTED]	085.
[REDACTED]	[REDACTED]	072
[REDACTED]	[REDACTED]	153
[REDACTED]	[REDACTED]	032
[REDACTED]	[REDACTED]	431
[REDACTED]	[REDACTED]	703C
[REDACTED]	[REDACTED]	075
[REDACTED]	[REDACTED]	450
[REDACTED]	[REDACTED]	388
[REDACTED]	[REDACTED]	377
[REDACTED]	[REDACTED]	089

Driver name Print + signature

Appendix G
Badge number

Print name

Signature

Badge Num

[Redacted]	[Redacted]	035
[Redacted]	[Redacted]	077A
[Redacted]	[Redacted]	257A 98
[Redacted]	[Redacted]	526
[Redacted]	[Redacted]	281
[Redacted]	[Redacted]	021 702C
[Redacted]	[Redacted]	708C
[Redacted]	[Redacted]	339C
[Redacted]	[Redacted]	396
[Redacted]	[Redacted]	566
[Redacted]	[Redacted]	187C
[Redacted]	[Redacted]	474
[Redacted]	[Redacted]	002C
[Redacted]	[Redacted]	043
[Redacted]	[Redacted]	392
[Redacted]	[Redacted]	544
[Redacted]	[Redacted]	120C
[Redacted]	[Redacted]	172
[Redacted]	[Redacted]	018
[Redacted]	[Redacted]	274C
[Redacted]	[Redacted]	344C

Driver name Print + signature

Badge number

PRINT NAME

SAD

BADGE No

[REDACTED]	[REDACTED]	193
[REDACTED]	[REDACTED]	082
[REDACTED]	[REDACTED]	014
[REDACTED]	[REDACTED]	102
[REDACTED]	[REDACTED]	076
[REDACTED]	[REDACTED]	400
[REDACTED]	[REDACTED]	174
[REDACTED]	[REDACTED]	203
[REDACTED]	[REDACTED]	325
[REDACTED]	[REDACTED]	252
[REDACTED]	[REDACTED]	268
[REDACTED]	[REDACTED]	052
[REDACTED]	[REDACTED]	052
[REDACTED]	[REDACTED]	141
[REDACTED]	[REDACTED]	220A
[REDACTED]	[REDACTED]	HCO 198
[REDACTED]	[REDACTED]	HCO 184
[REDACTED]	[REDACTED]	250A
[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	

Driver name Print + signature

Appendix G
Badge number

Driver name Print + signature	Appendix G Badge number
[REDACTED]	289C
[REDACTED]	116C
[REDACTED]	049
[REDACTED]	301
[REDACTED]	496
[REDACTED]	034
[REDACTED]	617
[REDACTED]	034
[REDACTED]	1712
[REDACTED]	568
[REDACTED]	office
[REDACTED]	149
[REDACTED]	office
[REDACTED]	chairman mainline

Driver name Print + signature

Appendix G
Badge number

[Redacted]

[Redacted]

[Redacted]

647

112

From: louis messruther
Sent: Wednesday, February 12, 2025 5:03 PM
To: Licensing (SCA) [REDACTED]
Subject: Re: Hackney Carriage and Private Hire Licensing Policy and Inclusive Service Plan consultation now live

We have more than enough ways on the station rank! It's giving me stress all this back and forth first we need ways then we don't then we do!? I've not seen anyone who requires a wav wait longer than five mins for one because most cars are ways kn that station....

Sent from [Outlook for Android](#)

OFFICIAL

From: Licensing (SCA) [REDACTED] >
Sent: Wednesday, February 12, 2025 2:30:42 PM
To: Licensing (SCA) <[REDACTED]>
Subject: Hackney Carriage and Private Hire Licensing Policy and Inclusive Service Plan consultation now live

This consultation gives you the chance to have your say on the review of our Hackney Carriage and Private Hire Licensing Policy and Inclusive Service Plan. The Policy sets out our general approach to how we determine licensing matters, including applications, and how we will carry out regulatory functions in relation to hackney carriage and private hire licensing across North Yorkshire.

We are also asking people to share their views on the draft Inclusive Service Plan. The Inclusive Service Plan focuses on the needs of people whose access requirements are apparent when using public transport, such as wheelchair users and assistance dog owners, but also on the needs of people with less visible disabilities.

You can find out more, read the draft policy and take part in the consultation (open until 30 April) at: www.northyorks.gov.uk/your-council/consultations-and-engagement/current-consultations

Kind regards

Licensing Services (East)

Town Hall
St Nicholas Street
Scarborough
North Yorkshire
YO11 2HG

Telephone: 0300 131 2131

Email: [REDACTED]

Web: www.northyorks.gov.uk



National Taxi Association

████████████████████
Carlisle, CA1 3LS

Tel: ██████████

Email: ██████████



22nd April 2025

Dear Sir or Madam

I write on behalf of our members in Scarborough and Whitby regarding the current consultation in respect of taxi and private hire vehicles.

Our members and ourselves have grave reservations about the proposed policy drafted by North Yorkshire Council.

We believe if the proposed policy goes through 'as is', then drivers will not be encouraged to invest or join the industry due to the costs involved, be they new drivers entering the industry, or, existing drivers looking to change vehicles at an age where they are thinking about retirement.

In respect of electric vehicles, we contend that there will be a gradual switch to such vehicles, such a draconian measure, as proposed, will bring in unnecessary expense.

A lack of charging points around the county, as pointed out to us by our members, is of obvious concern, the range of such vehicles considering how diverse the landscape is, from the Yorkshire Dales and North York Moors to the stunning coastline and the urban conurbations.

The UK government aims to transition to zero-emission vehicles by 2035, with a Zero Emission Vehicle (ZEV) mandate requiring manufacturers to sell a rising percentage of EVs, reaching 80% of new car sales by 2030 and 100% by 2035.

The government are considering lowering the 2035 date to 2030.

The above points to the absurdity of the proposed policy, as it is the policy of the government anyway.

We are obviously concerned that our members have had to deal with what will be the third change of policy in under a decade. As you will appreciate, any business needs some kind of stability in order to invest; changing the policy 'on the hoof' isn't a policy so much as a statement of despair and failure.

A change of policy every three or four years is not conducive towards this.

We fully understand the concerns regarding the relatively low number of wheelchair accessible vehicles in the county; however the current council policy could easily be amended to increase the number of such vehicles without having a negative effect on the incumbent taxi trade (that of which the majority of users rely).

It is the understanding of the association that the council were warned prior to the dissolution of the previous county areas of such a possibility, the fact you are again looking at amending the conditions of license appears to underline this.



National Taxi Association

██████████
Carlisle, CA1 3LS

Tel: ██████████

Email: ██████████

Despite our member's requests for meetings with NYC, we have been advised that such meetings have been ignored; this displays either an overbearing arrogance or a dismissal from you that such meetings could be conducive to the improvement of taxi services within NYC.

The current policy has been in place for less than two years and has not had enough time to see any real effect, given drivers are obviously committed to finance arrangements, therefore the only answer we can derive is prior warnings have been ignored to either councillors being misinformed or arrogance on the part of those advising councillors .

An admission of failure is not however expected.

In respect of Hackney Carriages, we suggest any newly issued license should only be attached to a wheelchair accessible vehicle, grandfather rights should be extended to all existing saloon hackney carriage vehicles upon renewal.

The emission standards for licensed vehicles are negligible, considering in a few short years drivers will have no choice but to purchase electric vehicles.

The above policy will ensure that anyone entering the industry will know what they are expected to purchase and it will ensure a mixed fleet of vehicles, one that covers the ambulant disabled and the wheelchair bound, most importantly, it will ensure that NYC have will at the very least retained in incumbent taxi trade.

Sincerely

██████████

Wayne Casey
Administration Officer
National Taxi Association



ACCESSIBLE TRANSPORT GROUP

20th August 2025

NYC Taxi & PHV Licensing Policy Summary

I am Chair of the NYDF's ATG. Following diagnosis in 2011 I soon became a wheelchair user. Probably circa 2013 I joined the Yorkshire Coast & Ryedale Disability Forum (YCRDF) where its Chair Bridget Hardy, herself a lifelong wheelchair user, told me that the YCRDF had been lobbying Scarborough BC for more wheelchair taxis (WAVs) since the turn of the century. I was actively campaigning for more WAVs for a few years before NYC came into being in 2023 and was told by the licensing officer at SBC in 2022 that NYC would address the shortage of WAVs in its first Licensing Policy.

Late 2022 the proposed NYC Policy was circulated which I did not believe would result in more WAVs becoming available for wheelchair users, not least because it did not propose a way that more WAVs would be forthcoming. The suggestion that by North Yorkshire becoming one zone, replacing the 7 zones, more WAVs would appear on the taxi ranks was unevicenced and nonsensical. A wheelchair user at home could not know if an out of town WAV was on the local rank and consequently, could not contact them by phone.

I obtained legal submissions from a barrister, Catherine Casserley, that raised a number of concerns. No proposal was included that all new vehicle applications must only be for a WAV, despite 4 Borough & District councils in NYC area, requiring that in their most recent Policies; no effective consultation had taken place and no significant survey of unmet need for WAVs had been done, as the PSED of NYC required. Finally, a number of submissions were made about the inadequacy of the Equality Impact Assessment, which was part of the proposed Policy. By adopting the Policy, the Executive ignored my submissions. However, I believe that NYC commissioned the Temple Group to do an Inclusive Service Plan or survey of unmet need as a result of my submissions.

I have obtained by FOI requests the quarterly data relating to the number of WAVs and saloon taxis. The number of WAVs has remained static since April 2023 but the number of saloon taxis had increased by 144, only recently dropping to an increase of 122. Had NYC included a requirement in April 2023 for all new vehicle applications to be for WAVs there would be many, many more WAVs available today. Feedback from wheelchair users to the ATG confirms that the inability to obtain a WAV continues, resulting in missed hospital and dental appointments and exacerbating transport related social isolation.

NYC have received the report from the Temple Group and have published a draft Inclusive Service Plan (ISP) late 2024 prior to the Executive considering adoption of the ISP. The ISP states that 200 more WAVs are needed which would bring the total to circa 270 or approx 36% of the total taxi fleet. Nationally, outside of London there are approx 52% of all taxis being WAVs. The NYC ISP also stated that "there is no reasonable expectation that the very low number of WAVs increasing without further interventions" in the Licensing Policy. The question now is what interventions will NYC introduce following the Consultation ?



The Executive agreed to consult on the proposed changes to the Policy in early 2025. It proposed that drivers of taxis could replace their vehicle with either a WAV, zero emission non-WAV taxi or a hybrid. Bizarrely, no Air Quality restrictions are proposed for PHVs despite them being as polluting as all other cars and no proposal has been made for PHVs to provide wheelchair accessible vehicles. These 2 omissions are very relevant as Uber PHVs have been licensed recently and by their use of predatory pricing, will undermine the confidence of taxi drivers in their financial viability going forward. We do not believe that many taxi drivers will invest in a WAV as taxi operators may decide to replace their vehicle with a Euro 6 diesel or petrol engine and operate as a PHV.

The Dept of Transport's Taxi & PHV Best Practice Guidance for Licensing Authorities Nov 2023 highlights the need for accessible taxis & accessible PHVs for disabled people. It recommends that NYC should incentivise the uptake of WAVs rather than mandating for more WAVs. NYC did exactly that in its current Policy by allowing WAVs (but not saloon taxis) to be kept in use until 15 years of age. It also dispensed with the licensing fee for WAVs. These incentives were ignored by the taxi trade suggesting that now NYC should mandate for more WAVs rather than allowing the taxi trade to choose their next vehicle.

Inevitably, I sought advice from Catherine Casserley again who prepared submissions that NYC received in December 2024. They included reference to the items in the Best Practice Guidance regarding wheelchair accessibility "that due regard is given to the PSED when taking decisions regarding taxis and PHVs...and that reasonable adjustments are made to remove barriers that prevent disabled people from accessing taxis and PHV services". The Guidance continues that Licensing Authorities should "incentivise the uptake of WAVs when mandating them would be inappropriate". The submissions include reference to the Equality Act s149 that "a public authority, in the exercising of its functions, have due regard to eliminate discrimination". The directors of two large taxi operators in Harrogate have expressed discriminatory attitudes to Jackie Snape, the Chief Executive at Disability Action Yorkshire to the effect that they will not provide WAV taxis. These comments were reported to both Gareth Bentley and Cllr. Tim Grogan, when he was Chair of the General Licensing & Registration Committee in the hope that they would verify them with Jackie Snape, but neither of them has done so. The submissions continue to make a number of references to NYC PSED in relation to the Best Practice Guidance.

Ms Casserley then makes reference to the Equality Impact Assessments (EIA) in the proposed amendments to the Policy and in the ISP - and thus any decisions based on them - stating that they are inadequate and/or flawed for the following reasons, of which there are 5. I will make reference to just one - that they fail to provide any evidential basis for consideration to alternative options to incentivise the uptake of WAVs, in the absence of mandating accessibility. No information has been provided regarding alternative options and the advantages and disadvantages of the same. She concluded by stating that she urged NYC not to adopt the reviewed Policy and ISP as proposed but to reconsider it in light of the representations made.

Before I continue may I point out that, in the Access Denied: Rights versus Reality report from the House of Commons Transport Committee (March 2025) Catherine Casserley is the only barrister who gave evidence, as she is recognised by the HoC Transport Committee as a leading authority on disability discrimination. In the report the primary recommendation is that "*Across the transport system, accessibility for disabled people must be recognised as a human right rather than a 'nice to have'. Failures should be seen as discrimination, not merely as a customer service issue. A change of mindset is needed at all levels among providers, regulators and enforcers*". As far as the review of NYC Licensing Policy is concerned the licensing authority is both the regulator and enforcer. If NYC now fails to effectively incentivise or mandate for more WAVs it is complicit in the indirect discrimination experienced by wheelchair users.



The Access Denied report is very relevant now to what NYC will decide to do regarding the review of its Licensing Policy. I will not attempt to pick out statements made in the report to keep this summary concise but I have attached a link to it at the end of my summary. I ask that all Councillors on the Executive read it before deciding on changes to the NYC Licensing Policy that will affect the lives of many wheelchair users.

To conclude I will suggest three proposals for NYC to consider.

- i) I suggest that NYC provide a grant of £10,000 to 20 to 50 taxi drivers every year for X years, until 200 more WAVs are reached, to encourage drivers to purchase a WAV taxi. Conditions would need to be drafted so that they operate the subsidised taxi for a number of years. Distribution of these WAVs needs to be based on the number of registered taxis in the 7 Borough council areas that formed the current NYC area so that all wheelchair users of North Yorkshire benefit regardless of where they live.
- ii) NYC knows when each licensed taxi needs replacing so I suggest that it requires every 3rd or 4th new vehicle application in turn to be for a WAV. This approach could be modified so that only operators with X number of taxis and PHVs have this suggestion applied to them. That said, it may mean that in rural areas the only taxi available will never be a WAV.
- iii) We believe that the revised Policy should state that no new non WAV licences will be approved until 50% of the fleet were WAVs.

What is more important to NYC councillors – putting the self-serving interests of the taxi trade ahead of taking steps now to ending the discrimination currently experienced by wheelchair users ?

This summary was written before I have received any feedback from the Consultation and without any indication of what the council may do following the Consultation. Once the council issues its report I will fund, once again, legal advice on its legitimacy from Catherine Casserley. The Access Denied report makes it clear that a disabled person should not have to fund legal action to eliminate the discrimination that they experience but, living under the decisions of NYC regarding taxi & PHV licensing, it appears that we do.

Chair of the North Yorkshire Disability Forum's Accessible Transport Group.

The link for the report - Access Denied : Rights versus Reality in Disabled Peoples Access to Transport is –

<https://publications.parliament.uk/pa/cm5901/cmselect/cmtrans/770/report.html>

Both legal submissions from Catherine Casserley will be on file with Barry Khan at County Hall.



From: [REDACTED] >
Date: Mon, 23 Jun 2025 at 14:40
Subject: Re: North Yorkshire Disability Forum request
To: NYDF ATG <[REDACTED]>

Hi Ian,

Happy to help in any way I can.

I can confirm that over the last 12 months we have received 87,300 assistance bookings totally 150,000 individual assistance requests. In the 12 months prior that was 66.5k bookings and 115k individual assists. So we are seeing a fairly sharp increase in numbers of assistance requests. Some of this increase will be the fact that we have now launched the Passenger Assistance app with our colleagues and are recording 'turn-up-and-go' assistance, but that certainly doesn't account for the full increase - I would suggest half of it at most.

I can also see that in the last 12 months 1/3 of all bookings were for customers who were using a wheelchair.

I hope that's useful.

Many thanks,

Many thanks,

Access Denied Report

a House of Commons All Party Transport Committee Publication

This 93 page document was published last week and is, I believe very relevant to North Yorkshire Council's current review of its Taxi & Private Hire Vehicle Licensing Policy. This letter to you reflects what I believe all members of the ATG need to know, as I doubt that many of you will read it in its entirety.

<https://committees.parliament.uk/committee/153/transport-committee/news/205876/access-denied-mps-call-for-overhaul-of-laws-strategy-and-attitudes-to-get-transport-working-for-disabled-people/>

I will start with what the Chair of the Transport Committee, Ruth Cadbury, said –

“Across the transport system, accessibility for disabled people must be recognised as a human right rather than a ‘nice to have’. Failures should be seen as discrimination, not merely as a customer service issue. A change of mindset is needed at all levels among providers, regulators and enforcers”. The regulators regarding wheelchair accessible taxis (WAVs) are North Yorkshire Council (NYC). As the Combined Authority has responsibility for public transport, I hope that the Mayor's Transport team accept what Ruth Cadbury MP has said.

Page 2 – Among Policymakers, accessibility needs to be urgently recognised as an issue of human rights with protection from discrimination. In the Council meetings that I have attended with both Councillors and officers I am not convinced that they accept this statement. The report continues - “The demands of accessibility have too often been set aside when deemed to be in conflict with other policy goals”. I suggest that NYC has proposed

[REDACTED]

to do exactly that by allowing taxi drivers to choose zero emission & hybrid cars or keep their diesel and petrol cars as Private Hire Vehicles (PHVs) rather than mandating for a percentage of all taxis to be WAV taxis.

P6 – item 11 highlights the Council's Public Sector Equality Duty (PSED) which is to eliminate the discrimination wheelchair users experience when trying to book a taxi. I believe that if NYC fails to mandate for more wheelchair taxis, they will not be compliant with their PSED duty.

Item 14 – the Transport Committee takes advice from the Disabled Persons Transport Advisory Committee (DPTAC) whose vision is “that all disabled people should have the same access to transport as everyone else, to be able to go where everyone else goes and to do so easily, confidently and without extra cost”. NYC believes that accessible PHVs are an acceptable alternative to WAV taxis. They are not as they do not have Council controlled meters enabling drivers to charge more for a journey than it would be for a non-disabled person in a metered taxi.

Item 18 to 30 covers The Experiences of Disabled People Using Public Transport. It is interesting reading as it includes colourful bar charts showing responses. It includes feedback from neuro-diverse people.

Item 34 – deals with the assumptions made by others why disabled people are travelling. “journeys are assumed to be for non-essential, leisure purposes and therefore without requirement for it to be reliable, predictable or efficient”. This is relevant to NYC bus passes which are valid only for off-peak travel, not for a bus to get to early starts or late finishes at work. NYC needs to recognise that this is no longer acceptable.

Item 39 – refers to the Government's Inclusive Transport Strategy 2018 – which sets out ambitions to “make sure that disabled people are able to travel easily, confidently and without extra cost” and to achieve “equal access for disabled people using the transport system”. Here we are 7 years later with wheelchair using residents still unable to obtain a taxi. The Council's own survey of unmet need concluded that 200 more WAV taxis are needed so I hope that the NYC Executive will now mandate for more WAV taxis to meet the Strategy's ambition.

Item 48 & 49 – “Barrister Catherine Casserley argued that rights to accessible transport should be enforced in the same way as any health & safety requirement. As part of any operation, any business has to comply with a range of obligations. These (rights) should be no different”. “Professor Anna Lawson, a specialist in disability and law at Leeds University, argued that the demands of accessibility were frequently disregarded when they appeared to be in conflict with other policy goal”. I believe that this is true as some NYC Councillors are giving too much regard, in my opinion, to the wishes of the taxi trade rather than the needs of wheelchair users.

Items 100 – 105 deals with the Ability to Bring Legal Action by disabled people who experience discrimination. I know from personal experience how difficult, time consuming and potentially expensive this is. Catherine Casserley is a Trustee of Transport for All and both she and Transport for All provided evidence to the Transport Committee. Cathy has drafted legal submissions for me in February 2013 and 2025 and in both she contends that NYC is failing its PSED to eliminate the discrimination experienced by wheelchair users. NYC in its Proposals **hopes** that the taxi trade will provide more WAV taxis. I believe that NYC will fail its PSED if it fails **to mandate** i.e., require more WAV taxis, once the Consultation concludes. To apply for a Judicial Review of such an outcome is potentially hugely expensive for a disabled person, whereas the Councillors on the NYC Executive will avoid any personal financial liability as council taxpayers, including us, will pick up their legal costs.

Item 128 – 130 is potentially relevant to our campaign for more WAV taxis as the Deputy Chief Executive of the Equality & Human Rights Commission told the Transport Committee that the Commission's role would be to work with sector regulators to encourage them to comply with their Public Sector Equality Duty.” I have asked him to contact NYC to encourage them to do just that regarding the review of the Taxi & PHV Policy.



I have deliberately missed out sections of the report on bus, train and air transport from this information sheet. I am willing to share my comprehensive notes on this report for those interested in bus, train and plane travel. My focus is, for now, on the sections of the Transport Committee's report relevant to North Yorkshire Councils review of its Licensing Policy.

On behalf of the ATG I will feedback to NYC the conclusions of the ATG members attending the meeting on 14th April. Please read this letter prior to that meeting. It has been written in a way that reflects my thoughts and opinion so please feel free to challenge anything that I have written.

Pages 82 of the report onwards list witnesses and their employment or relevance to the hearing then the Transport Committee has published the written evidence from all sources involved. It is a valuable resource.

 Chair of the NYDF Accessible Transport Group.

Good evening Gareth and Simon,

We were dismayed to hear from a taxi driver that Uber have recently been granted a licence to operate in North Yorkshire as we believe that more taxi drivers will choose to operate as a PHV now once the changes to the Licensing Policy come in. Uber has a reputation for being cheaper than taxis licensed by a local authority so competition for business for taxi drivers will increase. We expect NYC to introduce changes to their Policy forcing taxi drivers to replace their vehicle with a WAV or a ZEV or hybrid without making the same Climate based restrictions on PHVs. If the 10 year age limit is dropped taxi drivers can keep their diesel or petrol vehicle and operate as a PHV for some years to come. Does Ubers licence from NYC require their drivers to provide WAVs ? If not, why not ?

Unless the report to the Executive following the Consultation recommends keeping the 10 year age limit and applying the same Climate requirements for equally polluting PHVs we expect the changes to the Licensing Policy to fail to result in more WAV taxis. If we are correct it will leave NYC exposed to allegations that it has failed its Public Sector Equality Duty. Wheelchair users have lobbied the 7 Borough & District councils for more WAV taxis since the turn of the century so we will not accept decisions that will not result in 40 more WAV taxis a year for the next 5 years.

Regards Ian Lawson

Jackie Snape

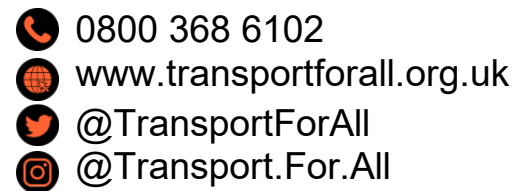
Chair of the North Yorkshire Disability Forum's

Chief Executive

Accessible Transport Group

Disability Action Yorkshire





Dear Licensing Team,

Re: WAV Consultation Response

Transport for All is writing in support of the North Yorkshire Disability Forum Accessible Transport Group's response to the above consultation. As an organisation that has long campaigned for accessible and inclusive transport for disabled people across the UK, we welcome North Yorkshire Council's efforts to consider the future of Hackney Carriage and Private Hire Vehicle (PHV) policy in the county and its commitment to an Inclusive Service Plan.

However, we are deeply concerned by the declining number of wheelchair accessible vehicles (WAVs) across North Yorkshire. The current shortfall significantly limits transport options for disabled residents and visitors, undermining both equality of opportunity and statutory duties under the Equality Act 2010.

Disabled people have an equal right to expect transport that is safe, timely, reliable, and dignified – and that includes the ability to **choose** between different transport modes. In your area, the lack of available WAVs means disabled passengers cannot make spontaneous journeys, rely on specific services, or travel during peak time or evening hours. This entrenches our isolation, limits access to work, education, healthcare, and social participation, and compounds the disadvantage already faced by many.

We urge the Council to adopt a proactive, evidence-based approach to increasing the availability and viability of WAVs in the region.

We specifically recommend the Council consider the following:

1. **Maintain and strengthen the proposed requirement that all new Hackney Carriage licenses be for WAVs from 2025 onwards.** This measure, already part of your draft policy, is a vital step, and we encourage you to enforce it consistently across districts.
2. **Consider financial incentives or forms of funding for WAV drivers and owners, such as:**
 - a. Grants to help with the **purchase, leasing, or conversion** of WAVs, similar to those offered in [Western Australia](#) or [Ireland](#).

- b. Waiving or reducing license fees or vehicle testing fees for WAV operators.

3. Offer operational benefits to WAV operators:



Priority access to high-footfall ranks, or dedicated WAV ranks in town centres and transport hubs.

- a. Access to Council-led dispatch or booking schemes prioritising disabled passengers.
 - b. Training and certification that allows drivers to market themselves as accessibility champions.
- 4. Set targets and monitor WAV provision across the county**, using licensing data and feedback from disabled users and groups to identify areas of greatest need and hold the system to account. Be transparent about current provision.
- 5. Create an accessible, well-publicised WAV directory or booking system** that allows disabled residents to find and pre-book vehicles with confidence.

While increasing the number of WAVs is critical, we must also address the **barriers disabled people face when seeking to use these services**. There are multiple reports – including from Transport for All members – of WAV operators declining journeys involving wheelchair users because of the additional time and effort required. This is unacceptable. Incentivising drivers and operators to take such journeys, and providing them with appropriate training and support, is essential.

Finally, we remind the Council that **disabled people have an equal right to travel with freedom, confidence and ease**. Spontaneity is part of freedom. The choice to hail a cab or book a last-minute PHV should be open to us too. Forcing us to rely on pre-arranged, specialist transport is unacceptable.

We strongly urge North Yorkshire Council to embed these recommendations within your final licensing policy and Inclusive Service Plan, and to work closely with disabled people's organisations, like the North Yorkshire Disability Forum and York Disability Action, in implementing and monitoring outcomes.

We are happy to provide any further evidence or case studies to support this consultation.

Yours sincerely,

Emma Koprena
Insight and Advice Manager