

### RESPONSE 1:

Dear Mid Suffolk District Council licencing team.

I include below my comments on the third review of the Hackney Carriage and Private Hire Vehicle Policies for Babergh and Mid Suffolk District Council (the Policy).

There are a number of things set out in the proposed Policy that I feel could be detrimental to the local industry, consumers and the environment.

So as to make clear my interests, my name is Luke Williams and I am the Operations manager and a partner of A2B Needham Market. Our business operates a number of private hire vehicles and works closely with many owner drivers. For many years our business activities have almost solely been supplying transport services to Suffolk County Council, primarily school transport services and services for vulnerable adults. As with the nature of school transport, many of my staff work on a part time basis. The vast majority of my part time staff would consider themselves semi-retired and take part time work by choice rather than necessity. Utilising part time workers is crucial to the running of my business and most of my part time staff are working on a single Suffolk County Council issued route consistently.

In an attempt to make it as clear as possible, I have marked below extracts from the proposed Policy in red and highlighted further any particularly concerning statements or wording in bold, my comments are in black and I highlighted further any recommendations or more important points in bold.

2.19.1 All new applicants are required to undertake the BTEC Level 2 course in an Introduction to the Role of a Professional Taxi and Private Hire Driver. This training is to be carried out at the drivers' expense and a pass certificate presented to the Council prior to acquiring a Combined Hackney Carriage & Private Hire Driver Badge. Refresher training will be required on a three-yearly basis. Drivers will be advised by the Licensing Team when refresher training is due.

**2.19.2 All existing drivers on renewal will be expected to undertake the BTEC Level 2 in an Introduction to the Role of a Professional Taxi and Private Hire Driver course and this training is to be carried out at the drivers' expense. A pass certificate must be presented to the Council within six months of the renewal of their Combined Hackney Carriage & Private Hire Driver Badge. Refresher training will be required on a three-yearly basis. Drivers will be advised by the Licensing Team when refresher training is due.**

FOR NON-DRIVER OPERATORS (including all partners and company directors)

10.2.3 Applicants are required to undertake the BTEC Level 2 course in an Introduction to the Role of a Professional Taxi and Private Hire Driver. This training is to be carried out at the applicants expense and a pass certificate presented to the Council prior to acquiring a Private Hire Operators

**I worry that 2.19.1 the requirement for new drivers to undertake this course at their expense will introduce a barrier to entry that for people wanting to enter the industry on a part time basis may consider to high either financially or in terms of difficulty to achieve.**

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Please note that we have already noticed increased difficulty in finding new part time drivers with the addition of the knowledge test. As stated above most of my part time staff are working on a single Suffolk County council issued route consistently.

**“3. CONDUCT OF ALL DRIVERS”** if fit for purpose should already be a comprehensive policy that ensures that drivers remain professional and thus I struggle to understand what benefits an introductory course could offer.

In respect to 2.19.2 I find it rather contemptuous that all existing drivers would be made to undertake a course called “an Introduction to the Role of a Professional Taxi and Private Hire Driver”. I, like many other existing licenced drivers, have been working in the industry for many years and have operated in a professional manner throughout those years. **The fact that we have been working in the industry and have abided by “3. CONDUCT OF ALL DRIVERS” without complaint for so long should be evidence enough that we do not need undertake an introductory course in being a Professional Taxi and Private Hire Driver.** I am sure many if not all other existing licensed drivers will take offence at this proposal.

10.2.3 Goes on to extend the need for qualification in “BTEC Level 2 course in an Introduction to the Role of a Professional Taxi and Private Hire Driver” to all partners and company directors. **I fail to see why all partners and company directors should be required to take this introductory course, provided that the director(s) or partner(s) who are in charge of the licenced operations are adequately knowledgeable of the councils policies (e.g myself, an operations manager who has been working in the industry for years). It would be detrimental to impose that all partners and company directors have this knowledge as there is no need for a financial backer (silent partner) to be qualified and it could introduce another barrier for anyone wishing to invest in the industry.**

**6.1.2 All licensed vehicles shall comply in all respects with the requirements set out below As appropriate for the type of vehicle (Hackney Carriage or Private Hire Vehicles including Stretched Limousines). This is in addition to all requirements of the Road Traffic legislation, which relates to all motor vehicles.**

### **6.1.5 Be no more than eight years of age since the date of first registration**

The wording currently used in 6.1.5 when taken with the context of 6.1.2 states that “All licensed vehicles shall be no more than eight years of age since the date of first registration”. The retirement of vehicles based on age is not going to be good for the environment, as the majority of the carbon footprint in the production the new vehicle, and I would draw comparison to the environmental issues with so called “fast fashion”. In my opinion vehicles should be used for as long as possible while remaining financially viable as the impact on the environment from vehicle production (including all environmental impact in the acquisition of a new vehicle and disposal of old vehicles) is far higher than that of a vehicle remaining in use for longer. The forced retirement of vehicles based on age, especially such a young one, will not be financially feasible for the industry in the vast majority of cases.

**I don’t believe that this is what 6.1.5 is supposed to mean and I believe that the correct wording should read “In applications for a new Hackney Carriage or Private Hire Vehicle**

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**licence, the vehicle shall be no more than eight years of age since the date of first registration at the time of application".** This will make far more sense and help with the move towards a greener taxi and PHV fleet.

In the vast majority of cases 8 passenger vehicles are built on a commercial platform that is designed to last for longer periods and higher mileages. Couple this with the higher purchasing price at new and higher residual values when used and I feel that there is a fair case **to increase the age from 8 years to 12 or more years for 8 passenger vehicles specifically so as to not outweigh any incentive for owners to acquire 8 seater vehicles. This may, in a lot of cases, also be applicable to wheelchair vehicles as the purchase price and residual values when used are so high in comparison to a standard 4 or 6 passenger vehicles.** Without doubt it would be detrimental to the needs of wheelchair users if any benefits of an operator offering a wheelchair accessible vehicle were outweighed by the financial outlay.

**6.1.11 Any application for a new Hackney Carriage or Private Hire Vehicle for 8 passengers must be Wheelchair accessible.**

I fear that a policy such as 6.1.11 fails to recognise the cost implications in regard to acquiring 8 passenger vehicles, wheelchair accessible vehicles and 8 passenger vehicles that are also Wheelchair accessible, nor the physical size, engine capacity and layout of the vast majority of 8 passenger vehicles that are also wheelchair accessible that are currently on the new and used market.

**As a company we have had many 8 passenger vehicles that are also wheelchair accessible and have found that in most cases they are in the form of long wheelbase high top vehicles that usually come fitted with larger engines due to the commercial platforms primary uses in the eyes of the manufacturer, or if not, are smaller short wheel base vehicles that are unpractical for non-wheelchair users that are traveling with a wheelchair user (for example a family that has a member who is a wheelchair user.)** Couple these issues with that stated above in response to 6.1.5 and I think that this policy will have not only an adverse effect on wheelchair users but also on families and larger groups who wish to travel as the benefits of acquiring such a vehicle will be far outweighed by the financial outlay. My business in particular has in the past acquired vehicles like these for use on Suffolk County council routes and have then had the vehicles available for when other wheelchair users wish to use our services. **If this policy was to be implemented, I will not be in the position to acquire any future 8 passenger vehicles!**

**If the Council's intention with this policy is to improve the availability of wheelchair accessible vehicles, I would suggest as above in response to 6.1.5 to increase the age that newly licenced vehicles can be from 8 years to 12 or more years for wheelchair access vehicles and 8 passenger vehicles (regardless if they are 8 passenger vehicles that are also wheelchair accessible). This would create an incentive for an operator to acquire wheelchair accessible vehicles and 8 passenger vehicles over a standard 4 or 6 passenger vehicles. This would in turn improve access to transport for wheelchair users and larger families and groups that, in a lot of cases, are currently having to book multiple smaller vehicles.**

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**The Council could use a similar incentive to steer operators into the purchase of hybrids and electric vehicles over petrol and diesel.** As mentioned in 6.1.8 The Council strongly recommends that new and replacement vehicles are either hybrid or electric, however if also imposing a maximum age for vehicles when applying for a new application, then, as in the case of 8 passenger vehicles and wheelchair accessible vehicles, the higher purchasing price at new and higher residual values when used may make it un financially viable for an operator to choose a hybrid or electric vehicle over a petrol and diesel equivalent. **I would suggest again to increase the age that newly licenced vehicles can be from 8 years to 12 or more years for hybrids and potentially an even bigger increase for fully electric vehicles as the emissions of operating a fully electric vehicle are so low.**

6.15.4 Self-adhesive identification signs as approved by the Council, **indicating that insurance is invalid unless the vehicle is booked by private hire**, must be affixed to the drivers' door and front passenger door panels of the vehicle. These signs should not be tampered with in any way and must be displayed at all times whilst the vehicle has current private hire vehicle plate affixed.

The way 6.15.4 is currently worded is factually incorrect. None of my private hire vehicle's insurance is invalid simply because it is not booked. If this were the case I would be driving without valid insurance whenever I did not have a paying passenger. **So as to be factually correct I would change the wording "indicating that insurance may be invalid if the vehicle is booked by means other than private hire"**. Although I can see no need for the statement to be affixed to the drivers and front passengers' doors as the nature of a private hire vehicle is pre booked in any case.

6.16.1 Any advertising on the vehicle must be restricted to the name, logo or insignia, telephone number, free-phone number, fax number, email address or web site of the owner or operator of the vehicle. **Advertising of other businesses or products or services is not permitted**, including art works, emblems, symbols, slogans, or other displays of any kind.

I feel that 6.16.1 is detrimental to not only the local taxi and PHV industry but also to other local industries. **I can see no better time than now to allow the advertising of other businesses as many of our local businesses are struggling to regain traffic after the recent covid restrictions. Advertisements for other local businesses would not only help the taxi and PHV industry with a small income stream but also offers a fantastic way for local businesses to advertise. A statement in the policy such as "all advertising of other businesses must first be approved by the council" would ensure that the aesthetic and businesses advertised remain respectable.**

### 6.16.5 PRIVATE HIRE VEHICLES

(i) For saloons and estate cars the lettering of all advertising/graphics etc must be a maximum height of 7.5 cm and must be confined to either the rear doors, the rear wings, or the rear of the vehicle to a size which does not exceed 800 sq. cms on either side or on the rear of the vehicle. **This is in keeping with the 'executive vehicle' nature of private hire.**

The wording in 6.16.5 (in bold) is incorrect and therefore the size of the graphics differing to Hackney carriage vehicles is irrelevant: as previously stated for many years our business activities have almost solely been supplying transport services to Suffolk County Council, primarily school transport and vulnerable adults. Also, the statement **"This is in keeping**

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**with the 'executive vehicle' nature of private hire."** is incorrect as in Mid Suffolk one could not say that the primary nature of private hire is to the executive market. Although I do accept that the executive market will make up a portion of private hire consumers it is only a portion and my PHV business in no way could be described as executive in nature. I understand that this statement may make more sense in a city like London where the executive travel will be in far higher demand.

**9.4.2 Prior to submitting the vehicle for testing owners must ensure that the vehicle is in good condition, i.e., mechanically sound, bodywork in a satisfactory condition and the engine and full chassis steam cleaned.**

As we have stated in previous policy consultations, steam cleaning of an engine should not be mandatory or recommended by the Council as in a lot of cases (and even more so in newer vehicles) vehicles have many complicated and sensitive electronics housed in the engine bay that are crucial to the operation of the engine, it should not need to be mentioned that sensitive electronics and water (even that in the form of steam) should be kept apart. **It is unwise for the council to include wording in the policy that indicates that at the council's request someone do something that is so likely to cause very costly damage their vehicle.**

**9.4.3 Owners of vehicles will be subject to a re-charge fee in respect of vehicles that have to be resubmitted for a second inspection test on the grounds of mechanical/MOT related reinspections pertaining to the specified requirements for hackney/private hire vehicles.**

As we have previously discussed with the Council, any re-test fee is at the testing station's discretion as such a fee may well not be charged by the testing station, for example, if the vehicle that has failed a test then goes on to have all of the remedial work carried out by the same testing station and then retested by the same testing station it is unlikely that a retest fee is charged by the testing station. If the testing station does not feel the need to charge the council a re-test fee then it is clearly wrong & I suggest illegal for the council to profit by charging an operator the fee. **I recommend the word "will" be replaced with the word "may".**

I will be sharing my thoughts with other local operators and expressing how important it is that they respond to the consultation with their concerns in the hope that the Council notice how implementing some of these policies could be detrimental to the local industry, consumers and the environment. I trust that the concerns and suggestions that result from this consultation will be taken into account by the Council when reviewing and making a decision on the new policy.

Many Thanks  
Luke Williams  
Operations manager  
A2B Needham Market

### RESPONSE 2:

8 Fir Tree Lane,  
Haughley,  
Stowmarket,  
Suffolk  
IP14 3RH.

Babergh & Mid Suffolk District Councils Licensing Team,  
Endeavour House,  
8, Russel Road,  
Ipswich,  
Suffolk.  
IP1 2BX.

3<sup>rd</sup> September 2021.

Dear Sir/Madam,

Further to your letter of 18<sup>th</sup> August concerning the Hackney Carriage, Private Hire Operator, Vehicle & Driver Policy Consultation please find below our comments that we would like given consideration when this policy is discussed.

We are a couple who have both been licensed in the Mid Suffolk District Council for over twenty five years. We have chosen to work predominantly during the evening/night with the majority of customers being commuters/airport travellers/pubs/clubs/diners/shift workers etc. Since coronavirus hit our level of traffic has dropped like a stone due to people working from home and the closure of pubs/clubs/restaurants/airports etc. A miniscule amount of essential workers have still needed transportation however for some this drivers has been insufficient to justify the expense of keeping a vehicle on the road and a vast amount have laid their vehicles up for a prolonged period of time. The Taxi industry is financially on it's knees at the moment and the following points that I wish to raise will only serve to push more people away from it and discourage new blood into this industry if they are implemented in January 2022 as proposed.

2:19.2.

All existing drivers on renewal will be expected to undertake the BTEC Level 2 in an Introduction to the Role of a Professional Taxi and Private Hire Driver Course and this training will be carried out at the drivers expense.

The majority of drivers who have been in the industry as long as we have are more than aware of these regulations and have been executing their duties accordingly. Whilst we can understand the need for new inexperienced drivers entering the trade to take this BTEC as a way of fast tracking their knowledge it is ultimately no replacement for time served skills. We find it questionable to expect the older generation who are often computer illiterate to complete this course .

For years it has been compulsory to carry fire extinguishers and first aid boxes yet there has been no stipulation for us to know how to operate either. No courses have been made mandatory for either of these so it is difficult to understand why are going from one extreme to the other. We feel a certain amount of "grandfather rights" should be applicable whereby people who have been in this work for upwards of 10 years and have practised these requirements should be spared the necessity or expenditure of a BTEC qualification.

It is also a consideration that in this area some of the newest drivers are Asian and are perfectly able to execute their duties however English is not their mother tongue and this will just be another barrier to retaining the services of current drivers or indeed recruiting new ones.

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6.1.5 Be no more than 8 years of age at the date of first registration.

Considering the cost of purchase and set up incurred this needs to be more flexible as the initial outlay will be a prohibitive factor to many people currently licensed and any who may be considering joining the trade

6.1.8

The Council strongly recommend new or replacement vehicles be either Hybrid or Electrical.

What a wonderful world it will be at some point in the future when this becomes the norm.

However at the moment very few people have secure parking spaces where they can charge their electric cars safely. The new housing estates that we weave our way through often have no provision for parking on their drives or in their garages and at the moment all I have is a mental vision of dozens of extension leads criss crossing their ways to the cars. It's nice saying they need to have a range of 140 miles. Brilliant I can get someone to the airport IF I dont use the radio, don't use my lights, don't have anything else that draws power however it has been proven unviable so far by Ipswich drivers who drop their passengers in Stowmarket Railway Station yard because they will not do any further onward travel as they are electric. I feel that at the moment Electric cars are not the answer however they will come into play in the future .At the moment we need to be allowed to continue with our vehicles and have the ability to update them with newer ones until all petrol and diesel cars are phased out and it is possible to purchase a hybrid/electric one second hand at a realistic price as opposed to the £25-£30k outlay a new one that would currently be prohibitive for many.

6.1.12

The following categories of vehicle are unacceptable to be licensed. City cars, Supermini, Small family cars etc.

.As long as any vehicles we replace fall within the stipulated remit regarding head clearance/leg room as set by yourselves then surely this is a step forward for the moment..Recently we have been looking at vehicles newer than the ones we currently drive. We have chosen to look only at estate vehicles as they can accommodate wheelchairs/walking frames/buggies etc however the majority of these have fallen into the "small family car" bracket as stipulated by licensing and as such are not allowed. However we can purchase a saloon car which is unsuitable to convey the above mentioned items but falls within the councils remit. By restricting our choice of purchase the council will be restricting our ability to carry certain passengers such as my little old ladies that both need walking frames. They will now need to travel seperately and will each be charged seperately as their walkers will not fit into the boot of a saloon car. We understand where the council is coming from on this issue but a level of practicality should be considered before the blanket ban on "small family cars" is introduced. we personally feel this will discriminate against anyone who needs the use of walkers/prams etc.

We are not councillors nor specialists in the transport of special needs people however we have continued to do our best to ensure that travel is accessible to all and can assist with wheelchairs and offer the use of turn tables for ease of access if required.

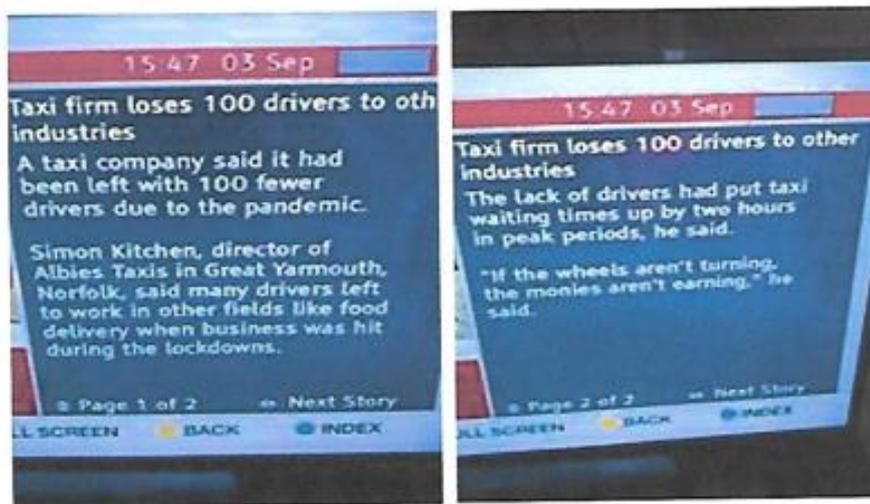
We have a huge gap in the taxi industry as does the HGV transport system yet new HGV drivers can be put through their tests at minimum personal cost and with immediate financial reward. It beggars the question of why would new taxi drivers invest so much personally and financially to enter an unknown occupation. We should be encouraging more people to become licensed drivers not putting obstacles in their way..

Things do have to move on in the taxi industry but we would urge the committee to put these new measures on the back boiler until the after effects of Covid has passed and we are back up and running. Don't kick us when we are already down or people will not return and then when the

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pubs/clubs/nightlife does reopen there will be nobody to transport these people home. Inevitably it will be like when they first reopened pubs and the local crazys came out to play. Insufficient taxis to move them at closing time means that drunken brawls will break out and police will be called to attend.

Please give consideration to articles such as the one below before bringing in new rules that can only compound the difficulty for both new and already established drivers that are hanging on by the skin on their teeth.



Handled properly and with forward thinking there will hopefully be a compromise whereby despite the outlay and some of the grimmer sides to taxi driving it will once again be a viable business with people coming forward to invest in their future trade and we would dearly love to still be hanging on in there when that day comes.

Thank you for taking the time to read my letter and we look forward to many more years of being licensed drivers.

Yours faithfully,

Mr& Mrs Crane.

### RESPONSE 3:

The comments below are made on behalf of the Mid Suffolk Disability Forum.

### **DRAFT BMSDC – Hackney Carriage, Private Car Operator, Vehicle and Driver Policy**

2.19 Training: Does the BTEC Level 2 include a module on disability awareness? The policy should be clear that disability awareness is a required element of training?

3.1 General Conduct: This section should include a clause that states 'All reasonable assistance will be afforded to passengers with disabilities'.

#### 4 Additional Assistance Requirements

4.1 The heading for this should be 'Passengers with assistance dogs' not Assistance Dogs.

4.2 The heading for this should be 'Passengers who are Wheelchair Users' not 'Wheelchair Passengers'.

4.2.3 'Before any movement ....brakes of the wheelchair have been applied'. Add to this clause: 'The driver must ensure that a passenger travelling in their wheelchair is wearing a seat belt unless the passenger is exempt.'

4.3.1 This would be better worded as 'Exemption from lifting wheelchairs or people who are wheelchair users or who have mobility difficulties and from transporting assistance dogs may only be obtained by individual drivers on medical grounds.

6.22.2 Please adjust the wording to 'passengers using a wheelchair' not 'in a wheelchair'. Change the reference to 'assistant' from 'helper'.

6.22.4 Please adjust the wording to 'passengers who travel in their wheelchairs' not 'wheelchair bound'.

6.22.5 The sign on the vehicle should simply say that it is 'wheelchair accessible'.

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11.13.1 With regard to Private Car Hire, it is concerning to read that the operator has to have a Company Policy for Drivers/Staff in respect of the carriage of assistance dogs and people with disabilities but does not say that this Company Policy should state that assistance dogs and people who use wheelchairs must be transported in line with the Equalities Act 2010 and not charged extra. It could allow an operator to have a discriminatory policy refusing to take assistance dogs or wheelchair users.

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### RESPONSE 4:

I've read this reply from luke Williams and I totally agree with what he has said especially the existing drivers needing to do a btec. I've been doing this job for 20 years and have never had to do this. Are you saying for 20 year I wasn't able to do my job properly. Rather insulting I think.

Darran mayhew

### RESPONSE 5:

Dear Licensing Team

I have been passed your letter dated 18<sup>th</sup> August, and would like to comment on the Policy Consultation as follows:

Clause 2:19      You refer to training to a BETEC Level 2 'Role of a Professional Taxi and Private Hire Driver' course. I would question whether this training includes safeguarding training? I know that previously, Mid Suffolk/Babergh did not include any safeguarding training for new and existing taxi drivers, and this is the ideal opportunity for this to change. *It is essential that taxi drivers have a good understanding and awareness of safeguarding both to protect their customers and to ensure they do not put themselves in a vulnerable situation.*

Clause 5.3      I welcome the intended consultation on mandatory CCTV in licensed vehicles. We deal with incidents where licensed drivers have complaints made against them, and if CCTV were available, this could help resolve the complaint potentially with more accuracy within a faster timeframe.

Yours faithfully

With kind regards.

Senior Transport Officer - Safeguarding

Growth, Highways and Infrastructure

Suffolk County Council

Constantine House, 5 Constantine Road, Ipswich, Suffolk, IP1 2DH

### RESPONSE 6:

Good afternoon,

In respect of the new licensing policy. We feel we need to raise or question the following points and raise some additional questions.

A) we note that you are proposing to add an BTEC National Diploma to the requirement. I have consulted with all of our drivers and we do not feel that this is a necessary requirement to becoming or staying as a Taxi driver. Most people fall into Taxi driving as either a 2nd income or a change of employment. The process is as it is drawn out, which doesn't aid us as an employer in recruiting drivers. We certainly don't feel the need for an additional qualification at our own expense. Again as an employer we'd like to see how this process can be speeded up and certainly not lengthened.

B) We feel that the age of a vehicle is immaterial as long as it's maintained and meets the taxi test criteria as well as the existing Midsuffolk criteria. We note that a vehicle must be no more than 8 years old. Having looked at the whole of the Midsuffolk fleet there are very very few who meet that criteria. To insist on this change will be to place unnecessary additional costs at the feet of your operators.

C) Tax disclosure is surely a private thing between the individual and HMRC and has no bearing on one's ability to transport passengers. Surely this contravenes the Data protection act.

D) Ranks there are simply not enough spaces / ranks for the taxis that we have at the moment so we feel this needs to be increased and possibly just outside the train station.

E) We wholeheartedly agree with the proposal to stop the sub contracting of School contract routes by preventing the transfer of safeguarding for children and vulnerable adults as this has long provided an unfair advantage to some of the larger firms in Stowmarket making money without actually doing the work. Hopefully this policy will cut that out which it needs to do.

F) If the combination of the two unitary authorities goes ahead which would make sense does that mean vehicle and driver licensing will be valid in Midsuffolk and Babergh. We feel this would be beneficial to all.

G) We'd like more help obtaining grants i.e in the recent pandemic these were not easily accessible and we probably missed out on help because we got referred to websites which are hard to navigate in large organisations on their main sites.

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F) It was massively easier in the pandemic when you guys accepted digital copies of documents and the like with this in mind are there plans to add a specific licensing portal like Suffolk on board for the new combined authority.

We have heard tell of some kind of board which consists of the likes of Kellys cabs and others on important town council related issues, we were not aware this existed and we're certainly never offered any consultation or opinion.

Lastly thanks to Kay at Midsuffolk was a massive help to us during the pandemic when we needed cars replaced and the likes.

Kind Regards

Richard Budd

Ops and Finance Director

Arrow Taxi Services Ltd (Stowmarket)

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### RESPONSE 7:

In response to your request for comments about the review of the Hackney Carriage and Private Hire Vehicle Policies for Babergh and Mid Suffolk District Council.

I am Lorraine Williams and I am a partner in A2B Needham Market. Our work is for Suffolk County Council in the form of 5 year contracts transporting children (both special educational needs and not) and young adults with special needs to places of education.

I list below my main concerns but in essence they are the same as those of Luke Williams:

**2.19.1** The requirement for new drivers to undertake this course at their expense will introduce another barrier to entry. We have already noticed increased difficulty in finding new part time drivers with the recently implemented but limited availability of the knowledge test.

**2.19.2** "An Introduction to the Role of a Professional Taxi and Private Hire Driver". I have held a Taxi and Private Hire driver licence for many years and strongly feel that I do not need to attend an introductory course, especially at my own expense, with the course costing between £150 - £300 and taking at least 3 days. **In my role driving children to school and back Suffolk County Council advise as to my role and conduct.**

**10.2.3** All partners and company directors have to attain this BTEC qualification. If a partner or director is not a professional driver I suggest there is no benefit to them having to take this course.

### Part 2

6.1.5 (6.1.2 All licensed vehicles....) Be no more than eight years of age since the date of first registration. I assume 6.1.5 refers to new registration and my comments below assume this.

I fail to see any logic to this, especially if the Council are trying to move towards a greener fleet. An average 4 door saloon car reduces it's carbon footprint by 50% simply by doing 200,000 miles rather than 100,000. The older the car, while still meeting the MOT and test in **9.4.1** then the LOWER it's carbon foot print. The large majority of an average 4 door saloon's carbon foot print is in it's manufacture.

Surely this (no more than 8 years old at **new application** for PHV) will not apply to 8 and above seaters as that would simply be ridiculous if trying to be "green".

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**6.1.6** Clearly in contradiction to 6.1.5. I assume by mistake.

**If any vehicle reaches the standards as required by the MOT and the additional test at 9.1.4 what actual grounds are there for limiting it's life for commercial use ?**

**In any event** I fail to see any logic to this, especially if the Council are trying to move towards a greener fleet. An average 4 door saloon car reduces it's carbon footprint by 50% simply by doing 200,000 miles rather than 100,000. The older the car, while still meeting the standards in an MOT and test in 9.4.1 then the LOWER it's carbon foot print. The large majority of an average 4 door saloon's carbon foot print is in it's manufacture.

**6.1.8** I'm not entirely sure that any 8 seater or above vehicles are available which match these recommendations

**6.1.11** This will mean unnecessarily large vehicles for school transport, causing more congestion (and pollution) at educational facilities and will undoubtedly put drivers out of work as the cost of purchase of an 8 passenger + wheel chair vehicle will prevent many drivers and/or operators from bidding for contracts.

**6.15.4** The insurance on our vehicles is NOT INVALID unless the vehicle is booked by private hire and in any event there will be garage trips, fuel trips, relocation of vehicle trips, return from drop off trips etc etc etc.

**6.16.5** "Executive vehicle" Nature of private hire ? It was my belief that dispensation to not display the licence plates was for the "executive vehicles" as I was unaware of any pre existing nature of private hire vehicles (perhaps in the very old days).

### **9.4.2**

It is unwise for the council to include wording in the policy that indicates that at the council's request someone do something that is so likely to cause very costly damage their vehicle. (Electrics)

**9.4.3** Re-charge fee - As we have previously discussed with the Council, any re-test fee is at the testing station's discretion as such a fee may well not be charged by the testing station, for example, if the vehicle that has failed a test then goes on to have all of the remedial work carried out by the same testing station and then retested by the same testing station it is unlikely that a retest fee is charged by the testing station. If the testing station does not feel the need to charge the council a re-test fee then it is clearly wrong & I suggest illegal for the council to profit by charging an operator a retest fee. **I recommend the word "will" be replaced with the word "may"**.

Many thanks

Lorraine Williams A2B Needham Market

### RESPONSE 8:

13/09/21

Having read the proposed changes to the policies I would like to share my feelings on some of the issues.

2.19.2

As a licensed driver of 18 years with an impeccable record with Mid Suffolk I do not feel that it would be necessary or beneficial to undertake this training course.

Surely the title itself indicates that this is for drivers that are new to the hackney carriage or private hire industry.

6.1.5

I agree that electric or hybrid cars are the future but for now and with the taxi industry on its knees due to the pandemic I feel strongly that it is unfair to stipulate that a car needs to be a maximum of 8 years old when first registered.

We need to encourage more people to the trade and not make it more difficult to get started.

If a car is roadworthy, well maintained, clean and tidy I don't see why age is an issue, especially in the short term for the above reasons mentioned.

6.1.6

With regards to 2 tests a year for older cars, surely 1 m.o.t and 1 taxi test is more than sufficient?

It is already tested twice yearly.

Yours faithfully

Duane Mayhew

### RESPONSE 9:

**Hackney Carriage, Private Hire Operator, Vehicle & Driver Policy Consultation**  
Firstly, thanks for the opportunity to review this proposal, I am both a private hire operator and a driver in Mid Suffolk. I have felt slightly insulted by some of it, given my years of experience, and confused by other parts as detailed in the following.

**Section 2.19.2** The sudden need for this training for experienced drivers, although reluctantly I except at least all can then show it. It is the need for refresher training every 3 years that seems superfluous as little has changed in 20 years. It just feels like an additional cost burden on drivers.

**Section 6.1.5** This section leaves me confused, is it saying all vehicles over 8 years olds must be scrapped at next renewal, or only vehicles less than 8 years can be licensed for the first time. This would mean no immediate problems for me as oldest vehicle is less than 6 years old, would wipe out significant numbers of taxis, and has huge cost implications for drivers. Then we move onto **6.1.6** which talks about vehicles 10 year old being tested twice a year.

**Section 6.1.8** I agree that hybrid or electric vehicles are currently the way forward, but they are expensive to buy. It seems the policy is against self-charging hybrids (we operate one) but in favour of Plug-in hybrids, fine if these are charged regularly but much more polluting if not. This of course raises the issue of charging points which the council has failed to produce to date.

**Section 6.1.15.4** Private Hire Signage, other councils locally have dedicated stickers on their vehicles, I am not aware that we have an equivalent, so then all private hire vehicles would be consistent, thus helping the wider public.

**Section 6.22.4** What is the point of refresher training if a course can be found if you are already regularly handling wheelchairs, it is insulting to the driver and may lead to even fewer wheelchair accessible vehicles in the future.

**Section 9.4.2** Why is steam cleaning of the chassis a requirement, clearly it must be clean enough to allow inspection. Steam cleaning may not be safe or appropriate for modern hybrids and electric vehicles. Clearly if an inspector cannot view a part due to dirt the vehicle should be failed.

**Sections 10.2.2-4** Why? is the first thought that springs to mind, in the case of a limited company you could have several of these, what is the need or the benefit? What use is the Role of a Taxi Driver qualification or the knowledge test when they will have google maps or similar available for setting fares.

**Michael Drain Driver & Operator of Superb Airport Transfers Ltd.**

RESPONSE 10:

# Kelly's Cabs

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24 Ipswich Street, Stowmarket, Suffolk. IP14 1AD

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F.A.O Licensing Team  
Babergh & Mid Suffolk District Council  
Endeavour House  
8 Russell Road,  
IPSWICH  
Suffolk  
IP1 2BX

9<sup>th</sup> Sept 2021

To whom it may concern,

Re: Hackney Carriage, Private Hire Operator, Vehicle & Driver Policy Consultation

Thank you for the opportunity to review the third revised policy.

My business, Kelly's Cabs, which is situated in the centre of Stowmarket, provides transport for the general public seven days a week, 24 hours a day. We also provide school transport for Suffolk County Council (passenger transport and Children and Young People Services), various local schools direct and we provide transfers for Galloway Coach Travel.

Our team, which includes Hackney Carriage Owner Drivers and Private Hire Owner Drivers carry out their duties on daily basis with a due care and attention required within such an industry to provide a service to all of the passengers mentioned above.

As a Taxi business owner, I have the pleasure of working alongside many drivers within the industry at various stages in their careers who work on a full and part time basis, without who, our industry would be in a situation where the transport needs of many would not be met. The ability to keep drivers involved who otherwise wish to retire, therefore keeping them involved in a part time position is essential to the industry.

The previous 18 months hit our industry hard with respect to the lack of bookings/walk ins which, to some was their main stay of income. Therefore many licensed drivers have already changed career to counteract the uncertain times we were in. The industry is slowly now picking up but many drivers still hold a certain uncertainty as to what the future may hold so in my opinion, our industry is in a very delicate state at present.

We have looked over the proposed changes and do have some points in which we would like to voice our opinion on.

*2.19.1 All new applicants are required to undertake the BTEC Level 2 course in an Introduction to the Role of a Professional Taxi and Private Hire Driver. This training is to be carried out at the drivers' expense and a pass certificate presented to the Council prior to acquiring a Combined Hackney Carriage & Private Hire Driver Badge. Refresher training will be required on a three-yearly basis. Drivers will be advised by the Licensing Team when refresher training is due.*

## APPENDIX B

2.19.2 *All existing drivers on renewal will be expected to undertake the BTEC Level 2 in an Introduction to the Role of a Professional Taxi and Private Hire Driver course and this training is to be carried out at the drivers' expense. A pass certificate must be presented to the Council within six months of the renewal of their Combined Hackney Carriage & Private Hire Driver Badge. Refresher training will be required on a three-yearly basis. Drivers will be advised by the Licensing Team when refresher training is due.*

*FOR NON-DRIVER OPERATORS (including all partners and company directors)*

10.2.3 *Applicants are required to undertake the BTEC Level 2 course in an Introduction to the Role of a Professional Taxi and Private Hire Driver. This training is to be carried out at the applicants' expense and a pass certificate presented to the Council prior to acquiring a Private Hire Operators*

We worry that 2.19.1 the requirement for new drivers to undertake this course at their expense will introduce a barrier to entry that for people wanting to enter the industry on a part time basis may consider to high either financially or in terms of difficulty to achieve. Please note that we have already noticed increased difficulty in finding new part time drivers with the addition of the knowledge test.

"3. CONDUCT OF ALL DRIVERS" if fit for purpose should already be a comprehensive policy that ensures that drivers remain professional and thus I struggle to understand what benefits an introductory course could offer.

In respect to 2.19.2 we find it rather insulting that all existing drivers would be made to undertake a course called "an Introduction to the Role of a Professional Taxi and Private Hire Driver". Myself and many of the drivers that work alongside us, have been working in the industry for many years and have operated in a professional manner throughout those years. The fact that we all have been working in the industry and have abided by "3. CONDUCT OF ALL DRIVERS" without complaint for so long should be evidence enough that we do not need undertake an introductory course in being a Professional Taxi and Private Hire Driver. We are sure that many if not all other existing licensed drivers across the board would take offence at this proposal.

10.2.3 Goes on to extend the need for qualification in "BTEC Level 2 course in an Introduction to the Role of a Professional Taxi and Private Hire Driver" to all partners and company directors. We do not understand why all partners and company directors should be required to take this introductory course, provided that the director(s) or partner(s) who oversee the licenced operations are adequately knowledgeable of the councils policies. We believe it would be detrimental to impose that all partners and company directors have this knowledge as there is no need for a financial backer (silent partner) to be qualified and it could introduce another barrier for anyone wishing to invest in the industry.

6.1.5 *Be no more than 8 years of age since the date of first registration*

We are aware of the current environmental pressures that we all need to be accountable for however requiring all new licensed vehicles to be no more than 8 years old will add pressure to the industry because any newcomer wanting to enter the industry would struggle to afford the initial outlay of an 8 year old vehicle without the use of other means such a finance agreement which instantly would add pressure and overheads thus becoming a negative point against entering the industry in the first place. Also accessible vehicles having the ability to carry 4, 6 or 8 passengers do come with an additional premium compared to a standard 4, 6 or 8 passenger vehicle. Add to this the fact that most standard 8 passenger vehicles are mass produced and firstly aimed at the commercial industry therefore these vehicles hold on their values so again extending the age limit of a viable vehicle could help with maintaining overall overheads. Maybe extending the age limit of a viable vehicle may help with making it more attainable and attractive to new entrants. Also in my opinion vehicle should be used for as long as possible whilst still remaining suitable for their intended purpose. The environmental impact involved in the producing and disposing of vehicles surely far out ways the environmental impact of reusing/recycling a used car.

6.1.6 *Where a currently licensed vehicle of either petrol or diesel reaches ten years of age it must be tested a minimum of twice a year to ensure the vehicle remains fully compliant and fit for purpose.*

## APPENDIX B

I would just like clarification that the two tests required a year is in addition to the VOSA MOT required by law.

*6.1.11 Any application for a new Hackney Carriage or Private Hire Vehicle for 8 Passengers must be Wheelchair accessible.*

We as a company use 8 seater vehicles for school transport and have consulted with other operators that run both non wheelchair and wheelchair accessible vehicles and have been informed that as stated above, the initial financial outlay for these vehicles are greatly impacted by the commercial industry as this is the blueprint most of these vehicles are designed for. Also the vehicles that are purposely designed for wheelchair use are typically in the form of a long wheelbase, high topped vehicle with a greater engine size to accommodate the additional aerodynamic flaws therefore making a bigger imprint on the environment. The smaller wheelchair accessible vehicles could be used but are unpractical for non-wheelchair users that are traveling with a wheelchair user. If this section of the policy becomes a reality I can say with certainty that I will not be in position to acquire future 8 passenger vehicles for the general public or Suffolk County Council .

If the Council's intention with this policy is to improve the availability of wheelchair accessible vehicles, I would suggest as above in response to 6.1.5 to increase the age that newly licenced vehicles can be from 8 years to 12 or more years for wheelchair access vehicles and 8 passenger vehicles (regardless if they are 8 passenger vehicles that are also wheelchair accessible). This would create an incentive for an operator to acquire wheelchair accessible vehicles and 8 passenger vehicles over a standard 4 or 6 passenger vehicles. This would in turn improve access to transport for wheelchair users and larger families and groups that, in a lot of cases, are currently having to book multiple smaller vehicles.

*6.1.13 Vehicles should have no damage affecting the structural safety of the vehicle and must not have been written off for insurance purposes at any time.*

I would like to bring your attention to the "must not have been written off for insurance purposes at any time" It is our thoughts that due to the expensive nature of cars and car parts many insurance companies will "write off" a vehicle for the simple fact that they, as a company, do see the viability in repairing the damage if it outweighs the book value of the vehicle. Due to the rising costs and the likelihood of cosmetic dents/scratches caused by an accident would be deemed too expensive by insurance companies the DVLA/VOSA have restructured the categories of a vehicle being "Written off". Whilst I understand that a "Cat S" (A Cat S car is one which has sustained structural damage during a crash – think items such as chassis and suspension. While the car can safely be repaired and put back on the road, Cat S cars must be re-registered with the DVLA.) has been deemed so due to structural safety and therefore may not be safe to use as a Hackney Carriage/Private hire vehicle, a vehicle categorised as a "Cat N" (A Cat N classification encompasses all non-structural damage, such as lights, infotainment and heated seats. As with Cat S cars, Cat N vehicles can be put back on the road, however, unlike Cat S cars, there is no need to re-register it with the DVLA – though you will still need to inform them your car has been written-off.) has been deemed so purely because the financial outlay the insurance company would need to make does not meet the insurance companies policies. Therefore may I suggest that in the case of a current licensed becoming a Cat N vehicle, once damage has been rectified, DVLA has been notified and VOSA has passed the vehicle as roadworthy an additional "Taxi Test" be required to ascertain if the vehicle is still "Fit for purpose" and able to carry on in the industry. In the case of a new licencing being issued for a "Cat N" vehicle, the vehicle is checked in the same way as any other new licence procedure.

*6.15.4 Self-adhesive identification signs as approved by the Council, indicating that insurance is invalid unless the vehicle is booked by private hire, must be affixed to the drivers' door and front passenger door panels of the vehicle. These signs should not be tampered with in any way and must be displayed at all times whilst the vehicle has current private hire vehicle plate affixed.*

I can see no need for any signage to be affixed to the drivers and front passengers' doors as the nature of a private hire vehicle is pre booked. In addition to this, any signage added onto a vehicles' paintwork, over time will cause damage the vehicles paint work either by scratching which would lead to rusting or fading.

## APPENDIX B

This then leads to additional, unneeded damage being caused which would devalue/deface the vehicle therefore the vehicle would be no longer "Fit for Purpose" .

*9.4.2 Prior to submitting the vehicle for testing owners must ensure that the vehicle is in good condition, i.e., mechanically sound, bodywork in a satisfactory condition and the engine and full chassis steam cleaned.*

The condition of steam cleaning of an engine should not be mandatory or recommended by the Council. A lot of vehicles have many intricate and sensitive electronics within the engine bay that are crucial for the correct engine to run as it should. If water were to get into places where electronics come into play then it is likely to cause damage which could be very costly to the vehicle owner

*9.4.3 Owners of vehicles will be subject to a re-charge fee in respect of vehicles that have to be resubmitted for a second inspection test on the grounds of mechanical/MOT related re-inspections pertaining to the specified requirements for hackney/private hire vehicles.*

We believe that any re-test fee is at the testing station's discretion as such a fee may well not be charged by the testing station, for example, if the vehicle that has failed a test then goes on to have all of the remedial work carried out by the same testing station and then retested by the same testing station it is unlikely that a retest fee is charged by the testing station. If the testing station does not feel the need to charge the council a re-test fee then it is clearly wrong. We recommend the word "will" be replaced with the word "may".

We have attached a list of signatures of Licenced Hackney Carriage/Private Hire Drivers who also share my thoughts on this matter and would hope that our thoughts are taken into consideration during the review of the third revised policy.

Many thanks

Alan Kelly  
Business Owner

APPENDIX B

Print Name: DACCAN MAITHEW

Signature: ..... Dated: 10/9/21

Print Name: AARON LANDYMORE

Signature: ..... Dated: 10/9/21

Print Name: ROBIN ADIS

Signature: ..... Dated: 10-9-21

Print Name: CHARLIE AKERS

Signature: ..... Dated: 10/09/2021

Print Name: WILLIAM HURST

Signature: ..... Dated: 10/9/2021

Print Name: PHILIP BOWEN

Signature: ..... Dated: 10/9/2021

Print Name: STEPHEN CHILVERTS

Signature: ..... Dated: 10-9-2021

**APPENDIX B**

Print Name: ZAKIR HUSSAIN SYED

Signature: ..... Dated: 10/09/2021

Print Name: GRHAM BROWN

Signature: ..... Dated: 11/09/2021

Print Name: LAURA ROBINSON

Signature: ..... Dated: 13/09/2021

Print Name: PAUL LEWIS

Signature: ..... Dated: 13/9/2021

Print Name: ROY FULCHER

Signature: ..... Dated: 13/9/2021

Print Name: NAZRUL ISLAM CHOWDHURY

Signature: ..... Dated: 13/9/21

Print Name: MICHAEL BENNETT

Signature: ..... Dated: 14/9/21

**APPENDIX B**

Print Name: M.R. Pocock

Signature: .....

Dated: 14/9/21

Print Name: .....

Signature: .....

Dated: .....

### RESPONSE 11:

15/09/2021

I feel now is not the time to impose new rules when drivers have suffered badly over the Covid crisis.

We have lost many drivers due to no work being available because of places being closed. Please check health and safety regulations re fire extinguisher in front of cars as my insurance company have said this is a breach of regulations as it puts the driver at risk of assault from passengers. We are also not covered to use this equipment should we suffer injury'.

The Btec or qualification that we need to do should not have to be done by drivers like myself that have done my job for 30 years plus.

New cars

While electrical cars are being promoted there are few charging places and are expensive to buy and maintain.

Cars less than 8 years old will increase our expenses so some of us cannot afford to continue with this job as insurance will cost more.

We are already closing some nights due to driver shortages more and more drivers are just covering school contracts because the night work is very problematic with drunk people being ill in taxis and abuse from passengers is much worse now than ever before.

There are not enough taxi rank spaces for the amount of independent drivers hence drivers are parking in dangerous places.

We are not first aid trained so cannot use our first aid kits.

These are just a few points I cannot find the email to respond to but these are a few points I feel are not going to help us to continue to provide a service which we are already struggling with.

Julie Row

I also forgot to mention

If we are required to help passengers with wheelchairs and lifting this comes under health and safety regulations and possibly involves manual handling courses having to be carried out by us.

Julie Row

### RESPONSE 12:

To whom it may concern,

We strongly disagree with all points of the consultation, not for the sake of being difficult or awkward, it's down to the fact that we as a trade, like many others have suffered the worst 18 months or more that this country has endured in modern times. Now is not the time for change, it's a time for consolidating and allowing the self employed people time to get back on their feet.

Our trade has been decimated due to covid, we have lost several drivers who won't be returning to the trade, this has left us short handed and very few new people coming through who want to become taxi drivers, this is mainly due to the ridiculous amounts of money that we have to pay out to gain our licenses and these proposed changes will only serve to decimate it further.

In the opening paragraph of your draft it states "Taxis and Private hire vehicles have a specific role to play in an integrated transport system" but your entire draft seems to contradict that statement by trying to finish off the trade in this area.

We can only speak of Mid Suffolk as that's the area that we operate in and we must say it's the most un-

taxi friendly area to work. Not enough rank spaces proportionate to the amount of licensed vehicles.

The two spaces in the regal car park are a joke and have probably never been used since they were put there, this also forces the independent taxis to park in ridiculous places when they are poaching work.

There is not a single supermarket or shop that has a designated taxi pick up point where we can load up our passengers safely, you missed a golden opportunity to put one in at the new Aldi, but there is 4 charging bays for electric vehicles but no taxi pick up point. Are taxis and their customers so low on the Council and planners radar that we are not given a second thought!!

You keep going on about us being "greener" yet the town is full of traffic lights that keep creating choke points as the town is overpopulated with these new estates and old roads that can't handle all the extra traffic. Also not allowing taxis and private hire vehicles to turn right into town from Milton road means that every journey into town made by taxis is over half a mile longer than necessary so adds more cost to the customer and more fumes pumped out into the air. We also receive a lot of abuse from customers who accuse us of "ripping" them off saying we are taking them the long way round into town.

With regards to changing to greener vehicles, this is just not practical. There are not enough charging points for vehicles, or are you expecting us to have them installed at our home addresses at yet more cost to us.

They do not have the range or reliability to be considered at present. There are not enough garages in the local area that are equipped to service electric cars therefore pushing us to having to use specialist main dealers at more over inflated costs.

I think there is a requirement for SUV type vehicles to be still licensed as Hackney Carriage as I have noted that a lot of the more modern hatchback type vehicles are very low to the ground making it quite difficult for a lot of our older clients to get in and out of the vehicle comfortably.

The changing of the age of vehicles is going to be problematic as no one in their right minds is going to spend between £8000 and £10000 and use that on weekend nights for people to abuse and be sick in.

It will also be difficult for drivers to get finance for that amount considering the small amount of work we've had over the last eighteen months.

## APPENDIX B

There will be a large increase to the cost of insurance.

I do not see the need for more wheelchair access vehicles as there are quite a few organisations that already provide a service for wheelchair users. Wheelchair friendly vehicles are normally large diesel vehicles that are heavy and not very environmentally friendly, they are higher up which can cause problems when picking up some of our older clients as they struggle to get into the vehicle.

### BTEC Qualification

I do not think that anyone who has served 5 years plus in the role of taxi driver should be subjected to this, it's quite an insult. I've been doing this going on 30 years and must be one of if not the longest serving taxi driver in Mid Suffolk, I really doubt that there is any situation that I haven't come across or anything you could teach me that I don't know.

### Fire Extinguisher

I don't think we should carry them in front of the vehicle, unfortunately you must live in a world that's full of unicorns and rainbows as this is basically handing a weapon to anyone that wants to use it against us, also drunk people like to fiddle and play with things, I really don't want to be travelling at the speed limit on the A14 and my passenger asks "what does this do" as they set the extinguisher off! And lastly after speaking with my insurance company they have told me that if I try and put the car fire out and burn myself I will not be covered for any kind of medical claim for loss of earnings, so with that in mind it negates the need to carry them.

### First Aid kit

Similarly to the fire extinguisher I don't believe that we should carry one either as unless fully up to date and certified as a first aider we cannot render any assistance, so therefore it becomes a very expensive ornament and when the contents expires we have to waste yet more money on purchasing another one that we still can't use.

### CCTV

I think a more important subject that should be looked into and I think is definitely more important than looking at other changes is the fitting of CCTV. All through out your draft it only mentions the safety and security of the public, yes, that is important, but the driver is not even given a second thought, you, as our licensing do nothing to help and protect us. Hull council think that this subject is very important as they have given all of their Taxi drivers a £500 grant to get CCTV installed in to their vehicles.

This leads onto my next point which is your complaint and punishment procedures, they impinge on our basic human rights and does not give us the chance to face our accuser or put our version of events forward before you hand out punishment. Not sure that is following legal procedure which is why I'm still working on my formal complaint against two members of your covid team.

I hope that all these points raised will be looked into and we would be quite happy to be approached to go into these subjects in more depth as there is much that needs improving on both sides to be able to continue operating a taxi service over the coming years as if we continue as we are then there won't be a service to continue and that would be a great shame and a great loss to our community.

Please acknowledge receipt of this email and note that this counts as two votes of full objections to the proposed changes at this time.

Yours faithfully

Paul Row & Jordan Row