

FULL CONSULTATION RESPONSES (sic)
with personal data removed

Dear Sir/madam

My view regarding the revised licensing policies are the following:

The 10% wheelchair accessible requirement for hackney carriages should be raised to 20% making wheelchair accessible vehicles more accessible to wheelchair users.

It should also be introduced to private hire firms as there is a lack of wheelchair accessible type vehicles in some private hire companies.

Yours sincerely

Mr. K.S. Minhas

Dear Steve.

Please do not issue any more hackney or private hire plates There is very little work. If you need more money simply double the money for current plates. If you really are serious about the environment then ban all diesel vehicles. As for idling, in the winter it gets cold so we need to keep cars running to keep warm.

H jaspal
Plate 240

I agree with the suggestions but is resignations from extinguishers a step in a right direction.
your sincerely,
Krzysztof Kiersztejn

Dear sir.

Thank you for your mail regarding the comments . i have sent you an email last time regarding the same matter unfortunately I did not receive any feedback.
i hope this time I will get your valuable feedback. I am a hackney driver and working for a company , I have to pay the company mileage as other drivers doing the same. The drivers have to pay .83P for each mile. which is very high and unfair. I believe the council will look at this and help us out of this problem. We try to work hard to get some benefit but at the end of the day most of our income goes to companies pockets. for example if we go to Heathrow airport we take 105 pounds from customers where we have to drive 84 to 90 miles and spend more than 3 hours and we have to pay to company 84* .83P which means most of the money going to the company. Sometimes if we go to pick a customer and don't have pick up we have to pay for that journey in full. Which is going from our pocket. Sometimes some customers don't pay or run away , unfortunately we have to pay for that as well .

Therefore I request you please look at this matter and change the mileage system.

Kind regards Syed Rahman.

Hi Steve,

I just have three points to relay.

Clarification of the Acceptable seating arrangements in multi passenger vehicles (MPV)

I have long held the opinion that the Chauffeur, Executive Private Hire companies should have its own policy. Whilst probably 80% of what we do does come under the governance of the existing hackney carriage there are some key differences. All my company does 100% is take business clients and some private to Airports and Concerts and special events like Cheltenham etc. thus all long distance journeys. It is very difficult for them to travel over 250 miles backwards. No matter how good a driver you are, people get travel sick and constantly have to swap seats with other occupants. I would like to see a concession with this policy. All modern MPV's have sliding seats where occupants in the back can get out quickly and safely should anything happen. Secondly unless the vehicle is a long wheel base version their Knee's constantly touch the people facing, Not Good. Also from an Health & Safety point of view whilst occupants shouldn't take their seat belt off, if they did for a second on a motorway at speed and we suddenly had to brake they would end up hitting the person facing. In this instance a seat in front would give better protection.

ULEVs Electric, Hydrogen Vehicles.

I believe we should stick to the current Government guidelines for target dates for swap over. All our work is distance work. The charging infrastructure is currently woefully inadequate. Electric cars at the moment do not give us anywhere near the range we need and is not economically viable at this time. I agree though if your working as a taxi in the town city centres this very much makes a lot of sense to reuce town pollution however, I think even then we should be sensible and wait to see how technology advances before realistically setting a date.

Boot Space for Wheelchair.

All my Vehicles have a boot that could take a wheel chair Audi A8 & S Class very expensive cars however, they wouldn't be able to take luggage to the Airport as well. The only vehicle on the vary rare occasion over 17 years I've had a client with a wheelchair I used the multi seater vehicle. They managed to get into the vehicle safely and easily with the help of staff or relatives. This vehicle is not converted. I do not believe its right to make it mandatory to make all vehicles have a boot big enough to take a wheel chair in our sector .We already have the vehicle capable but apart from the Multi seater would not be able to take luggage.

NHDC I believe in my experience to have been very fair over the years and have always sought feedback to policy. I hope my points above are not in anyway seen to be Elitist but we are very different to standard Taxi, Hackney Carriage and most Private Hire in our day to day business. I would very much like to offer any further assistance in any future policy for our sector if required.

Regards

Lee Harker PHO 113 Operators Licence.

Groupexec

NHDC TAXI CONSULATION AUG2020
comments on draft v3

2.4.4 The Council will seek to strike an appropriate balance between protecting the environment and ensuring sufficient transport provision in the District as it is aware that many elderly and/or vulnerable residents are dependant on hackney carriages and private hire vehicles to undertake essential journeys i.e shopping, social interaction and medical appointments.

Comment: I fail to see how switching off taxi engines whilst stationary is in any way relevant to the above statement. So this statement is misleading and should be removed.

OPTION ONE 2.4.5 All hackney carriage and private hire vehicles MUST switch off engines when stationary; NO vehicle is to be idling at any time particularly at hackney carriage ranks, when parked and whilst awaiting passengers. This will have a significant positive environmental impact considering the number of licensed vehicles within North Hertfordshire.

OR

OPTION TWO 2.4.5 All hackney carriage and private hire vehicles MUST switch off engines when stationary for more than one (1) minute. Vehicles are not to idle for any longer than one (1) minute, particularly at hackney carriage ranks, when parked and whilst awaiting passengers. This will have a significant positive environmental impact considering the number of licensed vehicles within North Hertfordshire.

Rule 123 of the Highway Code, Reg 98 of the Road Vehicles Regulations 1986, Section 42 of the Road Traffic (vehicle emissions) Regulations 2002 and section 87 of the 1995 Environment Act

Comment: The above are the extant laws that prohibit “unnecessary idling whilst stationary” section 42 the Road traffic act can be enforced with fines of up to £2500, fixed penalty notices of a minimum £20 can also already be applied. The Royal Borough of Kensington and Chelsea has £40 fixed penalty notices for idling. Given this, option one can be the only one to be considered. The thing I find surprising is that local authorities consistently fail to uphold the law.

2.4.6 All licensed hackney carriages and private hire vehicles will be required to display an anti-idling sticker provided by the Council inside the front windscreen or on the front dashboard reminding drivers of the need to switch off the engine when stationary.

Comment: Yes good idea.

2.4.7 The Council encourages the use of cleaner, low emission vehicles as hackney carriages or private hire vehicles and will offer a subsidised licence fee for electric or hybrid vehicles to encourage vehicle owners to consider changing to cleaner fuels.

Comment: Yes good idea. This should be coupled with an increase licensed fee (on a sliding scale perhaps?) for drivers of larger and more polluting vehicles, this information is readily available, based on CO2 emissions and NOX levels for diesels, from vehicle manufacturers. This will discourage hackney carriage drivers from buying large diesel Mercedes (as many of them seem to run now). It should also be clearly articulated to drivers and operators. The benefits of greatly reduce running costs with uLEVs.

2.4.8 The Council is aware of the limited hackney carriage rank provision in the District and the potential for hackney carriages to congregate in areas such as town centres, particularly as part of

Draft v3 Page 6 the late-night economy. This often causes increased emissions in high density residential areas having an adverse impact on public health and the environment

Comment: Is there any such thing as a late-night economy in the post-Covid "New Normal"?

OPTION ONE 2.4.10 The Council will seek to establish new hackney carriage ranks in town centres that will be limited to use by electric vehicles only; these ranks will have electric charging facilities. All other hackney carriages will have to use the existing hackney carriage ranks or park away from the town centre other than collecting pre-booked customers.

2.4.11 Private hire vehicles will only be permitted in the town centres to collect pre-booked customers.

2.4.12 An Appendix will be added to this Policy outlining the areas considered as a 'town centre' for the purposes of this section of the Policy at the appropriate time.

OR OPTION TWO

2.4.10 The Council will seek to establish new hackney carriage ranks in town centres that will be limited to use by electric or hybrid vehicles only; these ranks will have electric charging facilities. All other hackney carriages will have to use the existing hackney carriage ranks or park away from the town centre other than collecting pre-booked customers.

2.4.11 Private hire vehicles will only be permitted in the town centres to collect pre-booked customers.

2.4.12 An Appendix will be added to this Policy outlining the areas considered as a 'town centre' for the purposes of this section of the Policy at the appropriate time.

OR OPTION THREE

2.4.10 The Council will seek to establish new hackney carriage ranks in town centres that will be limited to use by electric, hybrid or ultra-low emission (uLEV) vehicles only; these ranks will have electric charging facilities. All other hackney carriages will have to use the existing hackney carriage ranks or park away from the town centre other than collecting pre-booked customers.

2.4.11 Private hire vehicles will only be permitted in the town centres to collect pre-booked customers. 2.4.12 An Appendix will be added to this Policy outlining the areas considered as a 'town centre' for the purposes of this section of the Policy at the appropriate time.

Comment: Option one is the most desirable and environmentally sound, however, this would curtail future use of uLEVs and may meet much more resistance in implementing, therefore, option three.

OPTION ONE

2.4.14 From 1 January 2028 all new vehicles must be ultra-low emission vehicles (uLEVs).

2.4.15 Existing licensed vehicles will be able to continue to be licensed, subject to section 2.4.16 below, until such time as they are replaced at which point they will be considered to be a new vehicle and must comply with section 2.4.14 above.

2.4.16 From 1 January 2035 no petrol, diesel or hybrid vehicle will be licensed by the Council.

OR OPTION TWO

2.4.14 From 1 January 2028 all new vehicles must be ultra-low emission vehicles (uLEVs).

2.4.15 Existing licensed vehicles will be able to continue to be licensed, subject to section 2.4.16 below, until such time as they are replaced at which point they will be considered to be a new vehicle and must comply with section 2.4.14 above

2.4.16 From 1 January 2028 no petrol, diesel or hybrid vehicle will be licensed by the Council.

OR OPTION THREE

2.4.14 From 1 January 2028 all new vehicles must be electric vehicles.

2.4.15 Existing licensed vehicles will be able to continue to be licensed, subject to section 2.4.16 below, until such time as they are replaced at which point they will be considered to be a new vehicle and must comply with section 2.4.14 above

2.4.16 From 1 January 2035 no petrol, diesel, uLEV or hybrid vehicle will be licensed by the Council.

OR OPTION FOUR

2.4.14 From 1 January 2035 all new vehicles must be electric vehicles.

2.4.15 Existing licensed vehicles will be able to continue to be licensed, subject to section 2.4.16 below, until such time as they are replaced at which point they must be replaced with either an electric or uLEV. 2.4.16 From 1 January 2035 no petrol, diesel, uLEV or hybrid vehicle will be licensed by the Council.

Comment: Option one is the only viable option but the 2.4.14 date of 1Jan 2028 is unacceptable, this should be replaced with the date of implementation of this policy, ie now!

The 2.4.16 date of 1 Jan 2035 is unacceptable and shouldn't be replaced with 1 Jan 2025

The dates currently proposed under sections 2.4.14 and 2.4.16 in option one are basically a) "kicking the can down the road!"; b) make the assumption, almost certainly incorrectly, that vehicles used as Hackney carriages have a working lifespan of longer than five years and c) will simply encourage Hackney carriage drivers to buy highly polluting vehicles in the last quarter of 2027.

2.7.3 To ensure adequate provision, the Council will endeavour to ensure that a suitable percentage of the licensed vehicles are purpose-built wheelchair accessible vehicles and that all other vehicles have sufficient space to carry a folding wheelchair.

Comment: What percentage?

OPTION ONE

2.7.4 New hackney carriages All vehicles for new hackney carriage licence applications must be either: (i) a 'London' type hackney carriage, or (ii) a suitable wheelchair accessible vehicle, approved by the Council, until a minimum of 10% of the total number of licensed hackney carriages meet this criteria, at which time this restriction will no longer apply. This restriction will apply at any time when the criteria is not met.

OR OPTION TWO

2.7.4 New hackney carriages All vehicles for new hackney carriage licence applications must be either: (i) a 'London' type hackney carriage, or (ii) a suitable wheelchair accessible vehicle, approved by the Council, until a minimum of 15% of the total number of licensed hackney carriages meet this criteria, at which time this restriction will no longer apply. This restriction will apply at any time when the criteria is not met.

OR OPTION THREE

2.7.4 New hackney carriages All vehicles for new hackney carriage licence applications must be either: (i) a 'London' type hackney carriage, or (ii) a suitable wheelchair accessible vehicle, approved by the Council, until a minimum of 20 % of the total number of licensed hackney carriages meet this criteria, at which time this restriction will no longer apply. This restriction will apply at any time when the criteria is not met.

Comment: Although some flexibility will need to be applied to 2.4.14 above until wheelchair accessible uLEVs become widely available, stipulating London Hackney type carriages is unacceptable unless these are uLEVs. At the present time I'm not sure any of them are.

Comment: Where do the percentage numbers come from in these three options above? NHDC's own website states that the number of people living in North Hertfordshire, claiming disability allowance is 4%. Although this is not an absolute number for people who require wheelchair access it's probably the best we have to go on, so none of the percentage numbers in the three options make any sense.

2.7.5 New private hire vehicles – all options

Comment: All new private hire vehicles, adapted for wheelchair access, including minibuses, should apply with the criteria in 2.4.14 option one dates amended as above.

2.11.3 No advertising of any other business is permitted on the exterior of the vehicle.

Comment: uLEVs Hackney carriage owners should be actively encouraged to advertise this fact on the outside of their vehicles and to have an internal advertising space promoting the benefits of uLEV transport to passengers.

Comment: For private hire vehicles and Hackney carriages that are not uLEVs internal advertising space should be provided to encourage passengers to report engines left idling whilst stationary with the reason why clearly articulated and a contact telephone number to report the incident.

2.19.1 On the occasion of major sporting or non-sporting events (for example, a world cup, coronation, royal wedding, etc.) a maximum of two (2) national flags may be flown on a licensed vehicle. The flags must be of a size and manufacture that will not obstruct the driver's view in anyway, nor endanger the safety of other road users or pedestrians. All flags are flown at the proprietor's own risk

Comment: Really, why?

2.29 Vehicles Powered by Liquid Petroleum Gas (LPG)

Comment: These vehicles will not meet the criteria required in section 2.4.14 so should be discouraged or not licensed.

Temporary Vehicles

Comment: 2.36.11 Licences for temporary vehicles will only be permitted, provided the temporary vehicle meets the criteria defined in 2.4.14

2.39 Stretched Limousines

Comment: It is most unlikely that any stretched limousine or vehicle of this type will meet the criteria defined in 2.4.14. Therefore, no licences should be granted to stretched limousine owners and all existing licences should be withdrawn effective immediately.

2.41 Courtesy Cars

2.41.1 The Council takes the view that vehicles, which are used as "courtesy cars", i.e. for transporting customers to and from garages, airports, hotels and night-clubs, without charge but with an obvious business benefit, are likely to need to be licensed under the private hire licensing scheme. Whilst there may not be a separate charge for using the vehicles, they are being supplied with a driver for a specific purpose which is likely to result in a 'business benefit', for example a customer using that particular business as opposed to one that doesn't offer the same transport service.

Comment: All courtesy cars, providing the services listed in 2.41.1 above, shall be required to meet the criteria defined in 2.4.14

2.43 Voluntary Sector Transport

Comment: Any voluntary sector providing transport services should be actively encouraged to meet the criteria defined in 2.4.14

5.4 Operators

5.4.1 An application for an operator licence will only be considered complete when all of the following components have been received:

- (i) prescribed application form, fully completed**
- (ii) appropriate fee**
- (iii) inspection of the operating premises by a licensing officer**
- (iv) basic Disclosure & Barring Service (DBS) disclosure(s) in accordance with section 4.2 above**
- (v) safeguarding training attendance in accordance with section 4.19 above**

Comment (vi) a statement of CO2 and NOX (for non-uLEV vehicles) which clearly identifies the vehicle and the operator licence number.

6.1 Enforcement

Comment: Somewhere in section 6.1 there needs to be the ability for disciplinary action and strict and rigorous enforcement action to be taken against non-uLEV drivers who fail to comply with the no idling criteria defined in 2.4.5. Fixed penalty notices should be applied with the option of reporting to the police as civil law is being broken. The licensing manager should have the ability to apply a “three strikes and you’re out” type policy for persistent offenders. This needs the legal team to look at it.

9.2 Waiting on Stands

Comment: Need to include some of the wording from section 2.4.5 in section 9.2

13.1 All references in this policy document to the following terms imply the definition below:

Comment: Need to include references to these: *Rule 123 of the Highway Code, Reg 98 of the Road Vehicles Regulations 1986, Section 42 of the Road Traffic (vehicle emissions) Regulations 2002 and section 87 of the 1995 Environment Act* in the definitions table in section 13.1

C.1.3 Whilst waiting on hackney carriage ranks, in addition to the requirements of subsection C.1.2, a licensed driver shall:

- (i) rank in an orderly manner and proceed promptly along the rank in accordance with rank protocol, and**
- (ii) remain in the vehicle, save for alighting to smoke or for comfort breaks.**

Comment: (iii) Not allow vehicle to idle whilst stationary

C.1.4 Whilst waiting at private hire operator premises, in addition to the requirements of subsection C.1.2, a licensed driver shall:

- (i) not undertake servicing or repair of vehicles on the highway,**
- (ii) not undertake servicing or repair of vehicles on the premises unless appropriate planning permission has been obtained, and**
- (iii) take whatever action is necessary to ensure that the business operation does not cause unnecessary disturbance to residents.**

Comment: (iv) Not allow vehicle to idle whilst stationary

APPENDIX D PENALTY POINTS SCHEME

Comment: From the table in D10 schedule of penalty points, failure to comply with the no idling requirements of this Policy shall incur 12 penalty points, not 4 as stated.

APPENDIX E ADDITIONAL CONDITIONS FOR LICENSING STRETCHED LIMOUSINES

Comment: For quite clear environmental reasons licensing should we withdrawn from all stretch limousines, effective immediately, and no further licences for stretch limousine should be granted unless these can be demonstrated to be uLEVs.

END OF COMMENTS.

R.A. Hart

Aug 2020

Dear Sirs

Please consider the following when undertaking the policy review:

Under the present economic climate I do not think any policy change regarding the introduction of ULEV's or electric vehicles will be possible or financially viable for fleet operators without further consultation or discussion. Whilst I appreciate the reasoning in considering an introduction date, the current uncertainty for small businesses means their immediate concerns are trying to stay in business and not having to think of future financial commitments which may be introduced.

DBS Checks for Private Hire Operator Staff. Clarification as to who will pay for this service should be provided. Staff turnaround can be an issue so again if the cost is to be borne by the operator then this seems a little harsh. Also I would like this to be discussed in more detail as to the thinking behind this proposal.

No idling. Some drivers will idle on the ranks for periods of time during cold weather in order to keep the vehicle warm. Assume this proposal is a "green" proposal so again maybe need to be clarified further.

Following the recent release of non wheelchair accessible Hackney Carriage licence plates, I believe that the current percentage limit should be increased. Again under the current climate of uncertainty I understand a number of existing Hackney Carriage vehicle owners are looking to sell up thus numbers will potentially reduce.

Vehicle dimensions and boot space. May this can be considered but again a popular model of hybrid vehicle currently being licensed does seem to have a small boot space although its environmentally friendly. Maybe consider not licensing certain "hatchbacks", ie: Vauxhall Astra, VW Golf type vehicles. However, as vehicle come in all shapes and sizes there will be much to consider as I have seen 4x4 vehicles licenced as Private Hire vehicles.

Multi Seat Vehicles. Seating arrangements should be reviewed as some purpose built 8 seater vehicles (not purpose built taxis) have a manufacturers seating arrangement which can not meet the current rules so therefore it becomes difficult to comply. Further research into this aspect should be considered before applying any policy changes.

Printed receipts. As previously mentioned at a forum meeting, I feel that printers are old technology and an expensive one at that. Most drivers now have card readers which have the

ability to text or email receipts. Furthermore, the customer will have a record of the transaction on their bank statement. I am not sure what the rationale was to introduce printed receipts, but some fleet operators have invested in technology including passenger apps which provide a complete record of any bookings. I have a printer in my vehicle and the volume of receipts issued has been minimal. I think this part of the policy needs looking at further or the need for printed receipts to be scrapped.

At present I do not feel prime location ranks should have any vehicles prioritised. Rank space is an issue in most towns so I am not sure what purpose this would serve.

When considering any policy changes thought should be given to the fact the majority of licenced vehicle owners are individuals but some changes could have financial impacts on fleet operators and not so on individuals and as previously mentioned there is a massive uncertainty in the trade as a whole at present.

I feel once the consultation period is over and before any major changes are applied to the policy, a summary of the proposals should be published and further trade discussions should be held.

M S Thind
Hackney Carriage Drivers Badge: 1111
Taxi Forum Member

Good Afternoon

I would like to put my thoughts and comments forward regarding the consultation.
I will comment on what I feel is most relevant and important to me.

2.4.4 - Idling

I agree with option 2.

2.4.6 - Stickers, I feel it is unnecessary to have stickers in the car to remind drivers of anti-idling rules, if it becomes a rule the drivers should know and adhere to it just like all the other rules. Stickers will cause more clutter and confusion for customers.

2.4.8 - Hackney carriage ranks

I disagree with 2.4.8 as the town centres (Hitchin) are not deemed to be 'highly dense residential areas'. As always emissions and noise levels should be kept to a minimal in the evenings and regardless of the location.

If restrictions are put in place for the town centre ranks, and types of NHDC licenced vehicles, it will give others such as Uber/Lyft to congregate the town centre and emissions and public health will still be an issue?

I feel it's more of an educated approach that is needed then restrictive approach.

2.4.10 - I agree with option 3, however I feel Euro 6 vehicles should be included in the proposed rank until the government guidelines when they phase out petrol and diesel and euro 6 vehicles.

In this moment in time 'electric and hybrid vehicles are very expensive, and the volume of trade vs taxis/Uber available, I don't feel it will be a viable investment as such. I feel normal conventional vehicles are being penalised are being pushed further away from the centre and the priority is with

electric & hybrid vehicles which shows signs of prejudice and discrimination against older licenced vehicles.

2.4.14 - option 1 feels the fairest, in this moment in time.

2.5.4 and 2.5.5 I will need more clarity on this clause, and I didn't understand the proposal?

2.7.4 - Option 1 seems the fairest.

2.7.5 - Option 2 seems the fairest - As it adds WAV to private hire companies and operators' fleet, and not just on independents owner drivers.

2.7.9 - Agree with this option

2.8.5 - Agree with this option

2.10.1 - Licence plates,

I disagree with this option. As an independent owner driver, the vehicle is commonly used for private personal use. Occasionally the genral public get confused if you are for hire or not and attempt to get in the vehicle because the plates and the signage can cause them confusion whether you're on duty or not.

Also, it may seem the driver may be touting for business when they are not. Furthermore, if the vehicle is in unfamiliar territory/area/town the magnetic plates are prone for theft. For this reason, I strongly disagree with this option.

2.18.13 - Child seats - I agree with this option.

2.20.3 Windows - I agree with this option.

2.26.3 - Taxi meter - I agree with option 3, all Private and Hackney vehicles should offer the same level of payment options and facilities.

2.28/5 - Disability access - I agree with this option.

2.36/2 - Accident reporting - I agree with option 1.

2.38 - Protective screens - I agree with most points made on this proposal.

Penalty points scheme: I agree with points award scheme, however with 40 out of 50 offences been uprated it seems really unfair, increase of points per offence has been set significantly higher than the previous table.

I hope my thoughts and comments are considered and I am more than happy to give more input in the consultation and proposals of the policy.

Kindest Regards

Saiful Hoque

1648

Dear Licensing team at NHDC,

Thank you for inviting me to review the changes to Hackney Carriage and Private Hire Licensing Policy.

It was helpful that the areas of change were in red – I have never even looked at a Hackney Carriage and Private Hire Licensing Policy before and so it made the job of reviewing it so much easier. I have reviewed only those areas high-lighted in red. In this letter, I have summarised my key points and I can be available to discuss these, or other points relating to this policy.

I am writing from the position of a local resident and an experienced business growth consultant. I now run my own business in Royston, but my professional background is a qualified process and productivity specialist and therefore I have written and reviewed hundreds of policies. It is from these combined positions and experience I have reviewed the changes to this policy.

Generally, I believe that I understand your long-term goal with Hackney Carriage and Private Hire. However, the reason I have taken time out of serving my own customers to reply is I strongly feel that some of the changes you are suggesting are flawed and I have explained these below along with a number of other observations.

In summary, I believe that:

- You are not considering how big the business of covid have been and that businesses will need time to stabilise before significant changes such as having to invest in new cars and implement new processes is enforced.
- Small one-car companies may be able to apply these rules quicker than bigger companies with larger fleets which will really struggle.
- Businesses will likely have business plans for a minimum of 5-10 years ahead and the more expensive changes such as replacing cars with much more expensive hybrid/electric ones will need to be introduced to these plans – otherwise how are they going to fund it all?
- There is poor availability of electric/hybrid cars and those which are available are really expensive. Waiting for a few years to implement this policy will give time for the relative cost of the cars to be more in line with current cars. I understand that especially those suitable to carry wheel chairs etc are particularly difficult to get at a reasonable price? Your policy has time to be implemented as the government changes are to be from 2035 – given the current business climate I believe this should be the target date.
- Taking in to account that users of taxis are unlikely to be aware that there are Hackney Carriage and Private Hire, to them they are 'just' taxis, and therefore having different user facing processes are just confusing and therefore I suggest that they are kept the same, where possible, throughout the policy.

I feel that a number of areas in this policy has not been properly thought through, and as a local resident I am not amused that some decisions are being made without statistical reasoning.

Given the time I have spent reviewing this document, I trust you will take my concerns seriously and consider them especially as I have done this at your request. In return, I request a response to each point – along with the action (if any) you are going to take – and if no action, then an explanation as to why not.

You will see my comments refer to the reference number and then I have added a few additional comments at the bottom of the document.

PART 2 – VEHICLES

2.4 Environmental Considerations

I agree with this new focus on climate change - it is in keeping with what the larger global society is pushing for.

2.4.4

I think this is too limited as this refers only to the elderly and vulnerable. Not everyone has cars, people use taxis for save transport home after being out in the evening, it is a safe mode of transport for children/teenagers, the weather can make it impossible to cycle or walk, the bus services in this area (especially the more rural villages) are extremely poor and therefore often taxis are the only form of transport for some people.

2.4.5

I would like the aspiration to be Option 1, but I believe it is unrealistic for drivers to turn their engines off EVERY time and therefore for me it must be Option 2

2.4.6

“All licensed hackney carriages and private hire vehicles will be required to display an anti-idling sticker provided by the Council inside the front windscreen or on the front dashboard reminding drivers of the need to switch off the engine when stationary.” At a time we are trying to improve safety on the roads – why are you suggesting adding blockages to the visibility for the drivers – I think the location of this sticker this is a flawed idea.

2.4.8 Hackney Carriage Ranks

Not all towns and villages have taxi ranks and therefore a lot of this policy seems very heavy for areas like Royston and the villages. You state that “This often causes increased emissions in high density residential areas having an adverse impact on public health and the environment”, I am not aware that Royston and the local villages have any taxi ranks in residential areas and therefore this illustrates my observation that this policy does seem heavy.

2.4.10/2.4.11/2.4.12 Hackney Carriage Ranks

I understand what you are trying to achieve here and I propose that option 3 is implemented for now with a plan to change to option 2 or 1 in say 7-10 years once the availability of electric / hybrid cars has improved. This will give the business owners chance to change over to these more expensive vehicles and to build this extra costs in to their business plans – this also fits better with the Government’s intention to introduce a ban on the sale of new petrol, diesel and hybrid cars in the UK by 2035 at the latest.

2.4.14/2.4.15/2.4.16 Environmentally Friendly Fleet

I think some of these options are far too heavy handed. It may be fine for a small one-car company but some of the larger companies are going to really struggle. I feel that by pushing this through sooner you will be severely hampering the survival of some of these companies. For this reason, I propose that you implement option 4.

2.4.17 Other Assistance

Your comment of “Government schemes offering subsidies and/or other help-to-buy alternatives for more environmentally friendly vehicles” Is very vague – what does this support actually look like in terms of money for the businesses? How do business access this information?

2.7 Vehicle Type

2.7.4 and also 2.7.5

I absolutely agree with what you are trying to achieve here however I think you are fundamentally flawed in your approach. Your current options seem to me like you are just trying to hit a NHDC target rather than actually make an effective change to the users of taxis.

A small one/two-car firm will simply wait until the bigger businesses have picked up this cost, making this an economically unfair proposal. I would instead suggest that each firm must have at least 10/15/20% of their cars as wheelchair friendly. Which then covers all taxi firms and not just bigger ones and or those changing their car at that time.

As far as a % goes I suggest that again your approach is flawed. I would want to base my opinion on research of how many wheelchair journeys are requested and then go for slightly above that figure. Your proposal feels like a guess which is not professional and could severely underserve those in wheelchairs and/or have a huge cost impact for no reason on local businesses if it is overpredicted. Clearly this percentage should also not be based on the number of disabled people as not all disabled people are in wheelchairs and occasionally there will be temporary wheelchair users e.g. a broken leg. This point is one of the key reasons I feel this policy has not been properly thought through.

2.7.7 Procedure for when the Wheelchair Accessible Criteria is Met

This reads like you limit the number of taxis which can be given a license? If this is so, then on what statistical evidence / grounds do you make that decision?

2.7.8

Spam filters are very strong sometimes and messages get lost in the cloud. I think this point does not address the issues of current technology – could you add a text to this option?

2.11.3 Advertising

This is very confusing as a standalone statement – is this connected with 2.1.1?

Why such restrictions? London taxi firms do this all the time and get additional income from the advertising – why is this an issue?

By putting this clause, you are restricting the taxi business owners an opportunity of having an additional revenue stream from advertising and also help to promote other local businesses.

This feels like someone is making rules up without thinking through the business implication to the owners, when doing exactly what you are saying no to is part of British culture, are you going to stop London taxi companies travelling in to NHDC to drop off passengers?

2.26.2/2.26.3/2.26.4 Meters

Option 3 sounds modern, consistent, fair and straight forward.

However, given the current instability for businesses, I would propose start with option 2 and then say in 3 years move to Option 3.

2.36 Accident Reporting

2.36.1/2.36.2

Option 1 seems to make the most sense.

What type of accident do you want them to report in 2.36.2? If there is no damage to their vehicle, why would they report it to you? Are they going to have to report running a rabbit over?

Are they reporting accidents they witness? If so, then that surely is a police issue and not NHDC.

2.36.4

I would add the option to inspect virtually e.g. a driver/owner can show you around on video camera on their phone to save unnecessary pollution and tax payers money – only in exceptional circumstances should a taxi be needed to be inspected in person.

2.36.9

Is there ever a situation where the police want a vehicle as evidence in a case? If so, then maybe this needs to be covered here

2.38 Protective Screens

2.38.1

Why can these not be optional at all times?

2.38.4

Does this apply when there is national instruction from the government to fit them? It reads like regardless of the national law the taxi businesses need to wait for your approval. Surely this is not correct? Why do they need to get permission when it is their vehicle and it is now a recognised safety measure? Will the council use government funding to support critical small business with this type of measure? Will you set up arrangements with local suppliers? Or at the very least maybe you could research potential suppliers to create a list in support of the business owners – who will have so many issues to address and support that I am sure some support would be extremely welcome.

PART 3 - DRIVERS

3.7.6 Disclosure & Barring Service (DBS) Disclosures

Is the company that the driver works through, also informed that they are now suspended?

3.10 Safeguarding Training

Is this free? Are you going to cover the cost of wages?

What if they have similar training from another UK local authority? E.g. Cambridgeshire?

If you are expecting them to attend your training on top of other similar training, then that seems over the top and disruptive.

Are certain professionals exempt? I understand from my personal contacts that many drivers are serving or ex-police or ex-forces. Are you saying that professionals with a very high-level of safeguarding training also need to attend your course? If they need to learn how to apply their knowledge to NHDC why not a simple leaflet to read or short video?

It says from 1 August 2019 – so has this been happening anyway, even before it became policy?

Can this course be online or via video? This will also reduce NHDC costs, reduce impact on emissions and congestion from drivers and staff travelling to you, and it also a standard procedure which fits with any future covid situations.

Could you postpone these additional requirements to allow businesses to stabilise before adding more pressure on them and staffing.

PART 4 - PRIVATE HIRE OPERATORS

4.2.3 and 5.4 (v) Disclosure & Barring Service (DBS) Disclosures

Why are you managing this via a DBS? The legislation related to this is surely GDPR?

What if taxi firms want a short-term of temporary member of staff? What about a company cleaner or car mechanic or valet? Does this apply to family members answering the phone for a one-car business?

Does this include agency staff or consultants working in the business?

Are you offering a simple process for business to put their DBS requirements through yourself? It is not as easy for small businesses to get DBS checks as it is for large businesses. Maybe you could offer this as a service to help business owners at cost price – or do you already and therefore adding to the number of people needing DBS checks is being considered as an income stream?

I think 'all persons involved in the management and staffing' needs defining as to the scope of persons involved.

PART 5 – APPLICATION PROCEDURE

5.5.4 and 5.5.5 Submitting and Collecting Documentation

You state, 'upon production of the existing plate or badge'. This assumes that there is something to hand in, but this section is for 'relating to all application types'. This is confusing and I suggest is clarified.

C.4 DRIVER CODE OF CONDUCT

I think a definition of lost property would be useful. Technically an empty crisp package could be classed as lost property, or a dirty pair of socks, or a scarf. Which are to be classed as lost property, and which are rubbish or disposable items?

Could a perceived monetary value be useful here and if so, how will drivers decide what that is?

Some items may be precious to their owner but have no perceived value.

Why do they hold on to the items for only 7 days and why take them to the police?

Has anyone asked the police what level of lost property they would keep? Maybe that could be used to create this policy point – and then the instruction has some basis of substance.

G REFERRALS TO THE LICENSING MANAGER

This process does not seem to have communication back to the business owners/managers. E.g. 6.4.5/6.4.6/6.4.7

G.1

What about complaints over the administration by the licensing team.

What happens if the complainant has issues with the department? Do you have a separate complaints policy? If so, then this should be referred to here.

Other observations

1. I think ALL cars – not just taxis should be told to turn off their engines when idling for more than a minute – maybe this could be suggested to the highways committee?

2. You may be interested that there is some inconsistency in capitalisation of your headings – personally, I prefer sentence case headings in my documents however I believe they should at least be consistent – e.g. 2.7.9 Renewal applications

3. I propose that the council looks at the time it takes to process the admin and applications of taxi firms. I imagine the types of processes this would include responding to correspondence, award licenses and test new drivers. After hearing comments from people applying to be taxi drivers with NHDC I believe that the NHDC processes and timescales are a significantly longer than neighbouring councils and in today's world of technology, and with my professional background in processes and productivity this all seems like it is taking too long. This will be unhelpful to the owners of business trying to recover from an unprecedentedly difficult year and recruit drivers with the uplift in demand, I imagine they will need people 'now' and those people will want to be in a job 'now'.

I look forward to hearing from you,
Regards
Jayne Bratton

Dear Mr Cob,

I hope this email finds you well during these unprecedented times.

Thank you very much for your email and to all staffs in taxi licensing department.

I first became a taxi driver in Letchworth back in 2003 and I remember we had to wait for six months to qualify and receive a station badge. However, I have noticed that nowadays anyone who applies for a station badge seems to receive this promptly and very easily. I don't feel this is fair for us. Therefore, I would like to ask if there is anything that you can do to support us Taxi Drivers who have more than 10 years of experience serving the community of Letchworth and their only way of any income is through passengers that we pick up from the Station as we do not have radios?

The second issue that I would like to bring to your attention is whether you feel it's right that those who are not a resident of Letchworth or North Hertfordshire are successfully becoming a Taxi driver in Letchworth? I don't think this should be acceptable and there should be extra measures in place to ensure this does not happen.

Thirdly, at the moment, drivers with the radio (such as Euro Cab) all join the queue at the station when they are quiet. For someone like me, with 17 years of experience, it's not fair when the only way of income for me is through passengers that I pick up at the station. I feel those drivers should go to th taxi rang outside the Cinema rather than have the opportunity to join the queue at Letchworth.

I urge you to find a way that will result in a fairer system for us more experienced drivers who do not have a radio.

Thanks in advance for the time you have taken to read this and I hope to hear from you with some positive news.

Best wishes,
Jalil ATOUFI
Plate number 58
Letchworth station taxi

Encourage Taxi companies to speed up the take up of Electric vehicles; the same for Electric buses....They already have electric buses in China !
Yours G.W.Howe

Policy Consultation

Let North Herts Hackney Carriage Taxis have the choice of adding to Taxi pick up apps like Uber Ola.It will give drivers another choice of work, picking up clients that otherwise clients will use & pay the mentioned app company taxis

Kind regards
Avtar Mander

In regards of proposition 2.10.1

It would not be acceptable to me to approve this regulation as it would amount to an invasion of privacy.

When I am not driving my taxi for work I do not want to be reminded of work by the plate on my car, the taxi light on my roof or any other signs of work. Likewise I would not wear my taxi badge round my neck in my free time.

I also don't want to be identified by members of the public as a taxi driver and have them know what I do for a living. It would take away my right to anonymity during my free time.

I also don't want customers to know where I spend my free time.

I don't want to be flagged down or asked for a lift by members of the public when I am not working. I don't want to explain to them why I'm not working when I clearly have an identifiable taxi.

I don't want to be stopped by police doing spot checks on taxis whilst I'm not working.

My free time and personal life should remain completely separate from work.

The vehicle is insured for personal use and should be exactly that - personal.

-- I hope this will suffice 😊

Kind Regards

Christina Boss and Ivars Boss

A few more points.

2.18.3 I agree with this. Although I wouldn't like the customer to see me as being unhelpful or unfriendly, but I'm sure I would like being sued for negligence or corporate manslaughter even less.

2.11.9 I can think of a certain private hire company with 'cab' in its name!

2.4.5 In winter this may have the opposite desired outcome if hackney carriage cars can't keep warm by idling on the rank, the drivers might have to drive around to keep warm due to the fact that there are now so many private hire cars, especially in Letchworth (including Uber) taking up work and causing longer waiting times for Hackney carriage cars. This scenario would cause more pollution not less, as does the ever increasing number of private hire cars at present. Where will all the private hire cars be idling during winter? Maybe we're looking at the wrong point where pollution is concerned.

Thanks once again for your attention - I don't get much!

Ivars

We believe operator technology has developed so fast and we should now have the option to use up to date computer Software technology for operators to run their business via a mobile operation instead of having to hire premises with utilities and staff costs.

Sonia price

Dear Sarah,

Thank you for the opportunity to comment on the above document. I have assumed that opinions are required predominantly on the various stated options, consequently my input is as follows:-

- 2.4.5 Option Two
- 2.4.10 Option Three
- 2.4.14 Option Three
- 2.7.4 Option Two
- 2.7.5 Option One
- 2.26.2 Option Two
- 2.36.1 Option Three

I trust the above will be of some assistance.

Sincerely
Keith Simpkins

I am encouraged that the Council is addressing the environmental impact of vehicles in the town centre. I would hope for the introduction of electric vehicles at the earliest opportunity, but I feel that drivers may need some appealing and accessible incentive to change asap.

My comments, as follows:

2.4.5 Option Two is probably more realistic for taxi queues and picking up in tightly parked roads.

2.4.10 Option One

2.4.14 Option Three. Some sort of incentive scheme would be appropriate.

2.4.16 Option Three date should read 2028 (says 2035).

2.7.4 Option Three. Very elderly people can be taken to appointments more easily with a wheelchair, so I feel more people would use taxis with wheelchair access.

2.7.5 Minibus option. Just wondering about the possibility/relevance of mentioning dial-a-ride schemes and sharing.

2.26.3 Option Three

2.36.1 Option Two or Three (more specific wording).

Hope this is helpful
Kathy O'Brien

I was asked if I had any comments on the proposed amendments to the NHDC taxi-licensing policy. It all looks fairly straightforward, and where I have any choice preferences these are given by section number below. There are also a couple of minor English corrections:

2.4.4 The spelling *dependant* normally, in English usage, is used for the noun, where e.g. a child is described as *a dependant*. Here, *dependent*, or relying upon, is better.

2.4.5 Option 1 seems unnecessarily draconian. I prefer option 2.

2.4.6 Yet another piece of signage which nobody will read. I think this is unnecessary.

2.4.10 – 2.4.12 I prefer option 3 for now, with the possibility of review in 5 – 10 years time.

2.4.14 – 2.4.16 Option 1 is good.

2.7.4 I have no idea what the proportion of the population is in wheelchairs, or the fraction of taxi users require a wheelchair, but I would guess that option 1 is more than adequate.

2.7.5 The private hire vehicles I have used have mainly been from companies consisting of one or two people, which would make anything except option 1 rather difficult to administer without hardship.

2.26.2 – 2.26.4 Option 3 gives the customer the option in all cases, so is preferred.

2.36.1 – 2.36.2 72 hours sounds reasonable, so option 1 preferred.

3.5.5 Item (ix): i.e. (which means *that is*) should be replaced by e.g. (meaning *for example*).

Yours sincerely

R F Carswell

As a member of the public living in Hitchin and frequent taxi user, I am responding to your invitation to comment on the revised Taxi Licencing proposals as follows:

Para 2.4.5 my preference is for option 2

Para 2.4.10 my preference is for option 3

Para 2.4.14 my preference is for option 1

Para 2.7.4 my preference is for option 2

Para 2.9.2 I would very much like to see the introduction of a distinctive livery for taxis. This aids identification of authorised vehicles that can safely be used by the public. Searching for the taxi licence plate on the back bumper is unhelpful particularly at night or when the vehicle is approaching a potential client.

Para 2.26.2 my preference is for option 3. In addition to the facility to accept credit/debit cards the facility to use a card touch screen for payment I have found very convenient and avoids the need to

enter PIN numbers in full view of other occupants of the taxi. This feature is currently in operation now by Gold Star Taxis in Stevenage.

Appendix C. Driver code of conduct

Suggested changes in red below.

C2 Driver Dress Code **and Personal Appearance**

C.2.1 The Council believes that licenced drivers have a responsibility to **present themselves professionally and appropriately in both dress and personal appearance** whilst undertaking hackney carriage or private hire work to promote confidence amongst members of the public, especially visitors to the District.

C.2.2 The following are deemed to be unacceptable standards of dress **or personal appearance** for a licenced driver and are not **allowed**:

(i) OK

(ii) OK

(iii) OK

(iv) OK

(v) OK

(vi) headgear such as baseball caps, or any headgear that partially or completely conceals the face or identity of the driver **excepting face covering as required for virus protection.**

(vii) **unkempt hair, untrimmed beards or stubble.**

Regards,

Peter Ball

Hi Sarah/Taxi Licensing team

In response to your invitation regarding Taxi Licensing consultation. Here are my comments. Please note, if the comments are published within a public report, do not include my contact details.

<https://www.north-herts.gov.uk/sites/northherts-cms/files/Policy%20for%20consultation.pdf>

2.4.5 Option TWO seems more reasonable for the present technology mix.

It could add a requirement that where start/stop technology is fitted to a vehicle, it should be enabled.

2.4.10

Option ONE or Option THREE

Charging points should be limited to electric or plugin hybrid vehicles only if sufficient provision cannot be made of charging points.

2.4.11

should include "or drop off" pre-booked customers

2.4.13 Option ONE

Especially considering the provisions in Section 2.5 it seems unreasonable for the council to ban new non-electric vehicles before the government ban in 2035

2.7.4 Option ONE

2.7.5 Option ONE

If another option is chosen at 2.7.5. There is no explanation of what type of vehicle will be acceptable once the wheelchair provision is met. The requirement for four doors must be retained for passenger comfort and safety. Many available electric and uLEV vehicles are small vehicles (3 door or fewer).

It can be resolved by adding the text (to any of the options TWO to FIVE):

Once wheelchair provision is met, all vehicles for new private hire licence applications must be either:

- (i) a saloon, estate, MPV or hatchback vehicle with a least four (4) side doors, or
- (ii) a purpose-built minibus designed to carry not less than (4) nor more than eight (8) passengers.

2.26 Option THREE

2.36 Option ONE

Note Options TWO and THREE are contain contradictory instructions in 2.36.1 and 2.36.2. Should the required time be 72 or 48/24 hours?

Regards
Sara Coles

I've read the proposals and agree that a regulation imposing no idling is long overdue. Some taxi drivers (and lots of other delivery drivers etc.) leave vehicles idling for quite a while, polluting the air.

The suggestion about introducing a requirement for vehicles to have sufficient boot space to carry passenger luggage and/or a foldable wheelchair seems sensible but would have to be introduced gradually, for new vehicles as older ones are replaced. It would seem very unfair if taxi drivers could not use their existing vehicles if they failed to meet this requirement.

Regards
Fiona Allison

Hi Sarah

Reviewing the policy I would oppose the following

Electric vehicle only ranks

As a rural district Electric vehicles do not yet offer the range to run all day and charging is not environmentally sustainable with current technology

Banning of Petrol Diesel or Hybrid vehicle from 2035

Whilst these classes of vehicles may well disappear by 2035 I also think Electric battery type vehicles will join them in obsolescence and as such the council has no need to set a policy now for 2035 and instead should set an age limit on vehicles in use as Taxis eg max age 20 years old etc which would mean the vehicles in use would continually upgrade over time

rgds

Ivan Geddis

Dear Sir or Madam,

I am a member of the North Herts community panel and was asked my email to comment on the consultation regarding Hackney Carriages.

I would like to comment on this point:

2.37 Security/CCTV 2.37.1 The hackney carriage and private hire trade provide a valuable public service, especially late at night when other forms of public transport are no longer available. Security for drivers and passengers is of paramount importance and CCTV cameras can be a valuable deterrent. That said, mandatory CCTV is not a requirement as the Council considers this a matter best left to the judgement of the owners and drivers themselves. If CCTV is installed in a vehicle, it will be incumbent upon the operator to handle relevant data gathered in an appropriate and secure manner.

I personally believe that the provision of CCTV should be mandatory and on by default, with the option of switching it off should the customer prefer it. This is to safeguard certain passengers, in particular women, who are I believe sometimes the subject of inappropriate conduct on the part of the driver.

Kind Regards

Phil Calver

Can I please suggest a requirement for bike awareness certification. Have had too many close passes and near misses - and one or two near death experiences - with taxis on North Herts roads for this not to be addressed.

General level of consideration when passing cyclists or pulling out from main roads is appalling.

Thanks

Matthew Peirce

All the proposed amendments listed seem sensible, but I think you should keep the requirement to carry a suitable fire extinguisher readily accessible to the driver.

Sue Kennedy

Dear Sarah

Having read the attached everything looks covered.

However why are those with any record of sexual convictions allowed to be a taxi driver ever again even after seven or 12 years? Thinking of the case of John Warboys.

I think it is sensible to keep a fire extinguisher of the correct variety in the vehicle too as it may make the difference between life and death.

Regards

Heather O'Dell

Thanks for this. I have looked at the proposed revised policy and I have no strong views on any of the proposed amendments to the regulations. I do, however, think that the use of the term "hackney carriage" throughout the document (rather than "taxi", or some other term that most people will understand) should be changed; it's now an historical anachronism, not a way of describing a taxi that anyone uses, and gives the impression that the Council prefers legalistic gobbledegook to plain English. I imagine that's not the image that the Council wishes to project. If "Hackney carriage" is legally necessary, you could get round that by having a statement at the beginning defining the terminology ("In this document, the word "taxi" is used to mean ...", or something like that?).

Thanks, David Pearson

Dear Steven

Thank you for the email dated 1st June 2020, I appreciate that there is much for you to do regarding the policy objectives you have outlined but I have to write and say that these are not welcome whilst we are struggling to navigate through the Covid 19 situation.

We have had no assistance from Government not falling into the leisure category for the grant. Whilst many of our drivers will be able to claim as they are self employed we are not able to claim anything at all. This has put a huge strain on our finances as you are still expecting us to pay for Licences, plating etc whilst earning no income what so ever for several months. The details enclosed in the email will simply add to the huge strain that we are under ensuring that our well run business survives this crisis which we have every intention of doing out of funds needed for other areas of the business.

We do not expect to be out of the woods for several months yet and the additional burden of policy objectives at this time is quite unwelcome. I'm sure you appreciate the difficulties we are facing. Some help from you either financially or by delaying some of the objectives would alleviate some of the burden and would be very much appreciated.

I look forward to hearing from you at the earliest opportunity.

Kind regards

Bill Stewart

Proposed amendments to The Hackney Carriage and Private Hire Licensing Policy

In response to your email advising us of proposed amendments we would like to reply as follows:-

Firstly and most importantly Butlermeltax has so far managed to survive the Covid 19 crisis with little or no work at all, there is very little public money around at present and a lot of the proposals have a financial factor involved which is questionable as to whether we can even afford them at this present time or in the next year if things do not pick up quickly as we still have our business overheads to pay for in the meantime.. We cannot see any improvement financially over the coming months.

Requirement of all staff in a private hire operator business to have a basic DBS

We are very concerned that the above proposal could be expensive and time consuming i.e. if you have a Private Hire one man operator he will not have hired staff but if his phone rings and one of his family answer for him do they have to have a DBS as well? From a company point of view we have regular operators but if one was to leave they would need replacing asap but they may not be suitable or they do not like the job so leave a month later meaning the DBS payment would have been wasted funds for the company. Anyone that joins the company is asked to sign an agreement on their first day to say that they understand that GDPR and Data Protection is detrimental for personal or private data during the course of their employment and extensive training is giving on the importance of the safety of data. There would also be a significant cost and time factor involved with this for the company.

Private Hire Operator Management to attend a safeguarding training:-

Safeguarding training has already been taken by one of the Directors with another council and the information is fed down to all members of the team and the business. Asking many members of the same company to attend the course is unnecessary and causes a great deal of strain financially and does not allow for time management especially when companies are fighting to keep in existence at this current time.

Introduction of a no idling requirement for Licensed vehicles:-

From our point of view this would be acceptable, especially as this is the law anyway.

Consideration of prime location ranks with usage limited to the most environmentally friendly vehicle:-

In Royston I cannot say we have any prime locations and very few Hackney drivers to cover any rank. But if we did have any we would not be able to afford to change our vehicles at present as these vehicles are extremely expensive and we would not be able to afford them until the price comes down considerably as the environmentally friendly vehicles become more common place and more companies offering cheaper vehicles enter the market place. We would need to ensure that the amazing fleet of vehicles that we have and well look after as you know are used to their full potential

and allowed to utilise their shelf life. In time as cars need replacing we would if we survive this crisis look at the cost factor and whether we would be able to afford them, in time as these vehicles will reduce in price this would then be something that we would be able to look at but certainly not at present.

Setting a date by which the licensed fleet will be restricted to uLEVs or electric vehicles:-

This could be the date a lot of taxis come off the road and go out of business!!

We believe that the Government have set a limit for any new cars to be uLEV or electric by 2035 why do we need to set one any different.

Consider whether the current 10% wheelchair accessible requirement for hackney carriages is still appropriate: -

We think this should be left as it is.

Consider whether the wheelchair accessible requirement should be introduced for private hire vehicles: -

No. This would be another nail in the coffin.

Introduction of a requirement for a vehicle to have enough boot space to carry passenger luggage and/or a foldable wheelchair

I would of thought that would be one of the considerations when you purchase your vehicle, all vehicles should have a big enough boot to cover passenger requirements.

Clarification that if a wheelchair accessible vehicle is unable to carry passengers in wheelchairs due to a mechanical fault or driver incapacity then the vehicle is automatically suspended until such time as the problem is resolved: -

There are also other reasons why a vehicle would not be able to cover this – it could be on a school run each day or booked for account work; how would you be able to control this?

Clarification of the procedure to be followed by the council when the wheelchair accessible percentage is met: -

Leave it as it is.

Clarification of the acceptable seating arrangements in multi-passenger vehicles: -

Surely a manufacturer sets a safety requirement when they produce cars, if a vehicle is not safe, they would not be able to manufacture them. We believe that your seating arrangements are wrong.

Removal of the requirement to carry a fire extinguisher:-

Yes

Clarifying the procedure for licence holders when a vehicle is involved in an accident and introducing a new procedure for temporary replacement vehicles:-

Yes

An option to replace the need for printers attached to taximeters with electronic receipts sent by email, text or similar digital smart technology:-

We gave our views on this in an email sent 25th February 2020, but we do feel that electronic receipts are how most companies work (including ourselves), Technology is moving on and we need to as well.

Clarification of the specification for protective screens due to security or medical reasons (such as a pandemic):-

This could work but how often would we expect a pandemic, you would also need to cost this maybe it could be entered as a choice not a compulsion. Insurance companies and council dictate certain specifications that would be impractical and costly it could also change the specification of the car.

Amendments to the process used by the licensing manager to determinations relating to applications, enforcement action or departures from policy:-

What will these amendments be? As long as each individual case is looked at as a separate case and judged fairly then this would be OK.

Simplification of the penalty point scheme:-

If things can be simplified to make it work then this is a good thing

I work for an operator in Royston and I have been doing some research into the pricing structures of North Herts, Cambridgeshire & Central Bedfordshire and believe that North Herts companies are losing out on business to those operators in the neighbouring counties due to the fact that North Herts is far more expensive.

The attached comparison charge excel I have created shows that a run from Royston to Cambridge of 13.5 miles costs **£34.70** in NH, however the same journey only costs **£27.73** in Cambridgeshire, which is **25%** more expensive! As a result of this the operator I work for in Royston is losing out on a lot of business to operators in Cambridgeshire.

My proposal is that the price per distance be changed as follows:-

“After the first 1,166 yards, for every **71.5 yards** or part thereof” be changed to “After the first 1,166 yards, for every **90 yards** or part thereof”.

As you can see from my calculations this would change the cost of the run to Cambridge from £34.70 to £28.20 which is in line with the Cambridgeshire & Central Bedfordshire rates and would greatly improve the competitiveness of the operators in North Herts and Royston in particular.

Please feel free to contact me to clarify anything that isn't clear.

Many thanks, Best regards, Daniel Locke

No idling, very important.

Anna Redmond

Sir / Madam,

I would like to respond to the above consultation as a local resident and a sometime taxi user, and also with a professional perspective as a sustainable built environment expert who regularly urban design and placemaking advice to local authorities and developers. I have only responded to questions where I have experience or expertise.

In terms of your options:

I prefer option ONE at 2.4.5 on the grounds of limiting air pollution as much as possible.

I support option THREE at 2.4.11 as incentivising electric, hybrid, and as yet unknown ULEV technologies both improves carbon performance and encourages the development of markets for alternative less polluting vehicles.

The timetabling options at 2.4.12 do not seem particularly rigorous or stretching, and I would strongly suggest the timetable is brought forward to 2025. I support permitting electric and ULEV technologies from that time. In futureproofing this licensing policy, I would suggest that a section be added to set out how new modes of people carrying transport might be enabled, particularly where they may be proposed by a community interest company or social enterprise; my thinking here is around cycle rickshaws or “shopper and goods delivery” given the resurgence of interest in cycling. It may also be worth referring to some of the automated goods delivery systems and how they might be tackled (eg Milton Keynes’ “Star” robot deliveries – see <https://www.smartcitiesworld.net/news/news/robot-deliveries-roll-out-in-milton-keynes-centre-5117>)

In terms of meters and receipts, I fully support the principle of enabling electronic receipts, however could I suggest that guidance or requirements are set out for the non retention of email addresses given for this purpose ie they must be erased, preferably as soon as an automated email is sent. I would be deeply concerned to have personal data and journey details in an unsecure or driver accessible location.

In 3.3 and 3.4, it would be useful to expect competency in fuel efficient driving (with the added benefit that this brings in terms of smooth and comfortable journeys). It seems essential that as well as local knowledge, drivers should have access to in-cab fitted sat nav and other smart navigation technologies. This has the added advantage that, if visible to the passenger, reassurance is given that the quickest or most traffic-appropriate route is being taken (which will fit will with the new smart roads technologies being trialled and expected to be introduced by Highways England).

I am not sure in which section of the consultation this fits, but I have recently had a communication problem with a private hire driver who did not know the location I was travelling to, and could not understand the directions I was trying to give him (I had to hand him my phone in the end to show him the route). Could I suggest that a reasonable level of spoken English is a requirement of a license.

I have not been able to find a section dealing with the locations that should be covered by a taxi service, other than town centres. Could I request that attention is given to railway stations, and that NHDC should work with Govia to find a solution to the lack of taxis at stations outside of peak

time. Given that workers are now asked to commute at staggered times to “broaden the peak”, more passengers will need taxis outside the traditional 7-8am / 5-7pm bracket. There are often times when hackney cab ranks are unoccupied, and private hire often do not have cars available at these times, resulting in substantial waits (more than 15 minutes sometimes). Could a minimum level of cover be required from hackney or private hire operators for stations? This would facilitate better mode shift away from private cars, as well as alleviating some of the parking issues caused by those travelling outside the traditional rush hour peak who do not feel able to rely on taxis being available, especially at night or in poor weather.

I hope this response is helpful to you, please do not hesitate to contact me if anything is unclear or requires expansion.

Regards

Lynne Ceeney

At this present time when taxis are not being hardly required by the public I'm sure I speak for many of us drivers who have had no business since March that we are worried we still have all our council requirements to pay all our insurance for the taxi our station permits to renew and with no revenue coming we cannot at this time be thinking of spending money on new metres for our taxis new electric vehicles when some of us are still paying finance which we have had to pay coronavirus or no coronavirus we have a card receipt policy and if someone wants an e mail they are sent one from our phone the government suspended our mortgage would it not be a good thing for the council to look at extending our hackney caridge licences for another 6 months free of charge The company's maybe have had some business but us indecent taxis haven't we was always struggling before coronavirus with Uber many thanks Tarek Elnemr

Comments redacted as not suitable for publication due to inflammatory tone

Teimour Bakhtiar

Hi steve.

I am not happy with the

Introduction of a no idling requirement for licensed vehicles because what happens in the winter when it is cold and we need the engine running so that we are not sitting in a freezing cold car. Also, when it is too hot we need the engine running so we can have the air con in the car, so we are not sitting in a too hot taxi. Also, how are we going to charge our mobile phones because without the engine running the car battery will go flat. Another reason is when it is not busy and most taxi drivers are on their mobile phones to keep them occupied while waiting for customers to arrive.

Regards

Shamriz Khan

Introduction of a requirement for all staff in a private hire operator business that have access to sensitive information, for example office managers and call handlers, to provide a basic DBS disclosure

I feel this is appropriate and should be rolled out to all office staff [RSB]

Introduction of a requirement for private hire operator management to attend safeguarding training
Safeguarding is important and should be rolled out to all office staff [RSB]

Introducing a no idling requirement for licensed vehicles

Only if it is appropriate to do so, most new vehicle are fitted with stop / start functionality [RSB]

Consideration of prime location ranks with usage limited to the most environmentally friendly vehicles

Ultra low emission diesel car (Adblue additives versions) should also be allowed to stand on this new rank as the emission are negligible in mot tests [RSB]

Setting a date by which the licensed fleet will be restricted to uLEVs or electric vehicles

Suggested date 2035, same as motor industry [RSB]

Consideration of whether the current 10% wheelchair accessible requirement for hackney carriages is still appropriate

Should be increased to 15% to reduce the amount of Hackney vehicle on the road, due to work limitations. [RSB]

Consideration of whether the wheelchair accessible requirement should be introduced for private hire vehicles

This maybe an advantageous possibility to increase the WCA vehicles fleet without affecting Hackney vehicles. [RSB]

Introduction of a requirement for a vehicle to have sufficient boot space to carry passenger luggage and/or a foldable wheelchair.

This is overkill if the above action is going ahead. [RSB]

Clarification that if a wheelchair accessible vehicle is unable to carry passengers in wheelchairs due to mechanical fault or driver incapacity then the vehicle is automatically suspended until such time as the problem is resolved.

Agreed [RSB]

Clarification of the procedure to be followed by the Council when the wheelchair accessible percentage is met.

New plates should only be released if there is work demand not just because the WCA threshold has been met. [RSB]

Clarification of the acceptable seating arrangements in multi-passenger vehicles

No comment [RSB]

Removal of the requirement to carry a fire extinguisher

Agreed - as it dangerous to revisit a vehicle in a fire situation to use a extinguisher [RSB]

Clarifying the procedure for licence holders when a vehicle is involved in an accident and introducing a new procedure for temporary replacement vehicles

Agreed, this process need to be fast, responsive and effective communication with all parties. [RSB]

An option to replace the need for printers attached to taximeters with electronic receipts sent by email, text or similar digital smart technology

New technology (smart phones) have replaced the need for an expensive printer solution. [RSB]

Clarification of the specification for protective screens due to security or medical reasons (such as a pandemic)

This should remain optional to install but need to be compliant with safety standards, NHDC / insurance companies requirements and Installation by the manufacturer. [RSB]

Amendments to the process used by the licensing manager to make determinations relating to applications, enforcement action or departures from policy

No comment [RSB]

Simplification of the penalty point scheme

Agreed [RSB]

Randhir Singh Bachra

Dear Steve,

I have issues with the following amendments in the policy (my concerns/ comments listed in Black):

Idling

OPTION ONE

2.4.5 All hackney carriage and private hire vehicles MUST switch off engines when stationary; NO vehicle is to be idling at any time particularly at hackney carriage ranks, when parked and whilst awaiting passengers. This will have a significant positive environmental impact considering the number of licensed vehicles within North Hertfordshire.

OR

OPTION TWO

2.4.5 All hackney carriage and private hire vehicles MUST switch off engines when stationary for more than one (1) minute. Vehicles are not to idle for any longer than one (1) minute, particularly at hackney carriage ranks, when parked and whilst awaiting passengers. This will have a significant positive environmental impact considering the number of licensed vehicles within North Hertfordshire.

Option 1 just is not practical.

Hackney Carriage Ranks

OPTION ONE

2.4.10 The Council will seek to establish new hackney carriage ranks in town centres that will be limited to use by electric vehicles only; these ranks will have electric charging facilities. All other hackney carriages will have to use the existing hackney carriage ranks or park away from the town centre other than collecting pre-booked customers.

2.4.11 Private hire vehicles will only be permitted in the town centres to collect pre-booked customers.

2.4.12 An Appendix will be added to this Policy outlining the areas considered as a 'town centre' for the purposes of this section of the Policy at the appropriate time.

OR

OPTION TWO

2.4.10 The Council will seek to establish new hackney carriage ranks in town centres that will be limited

to use by electric or hybrid vehicles only; these ranks will have electric charging facilities. All other hackney carriages will have to use the existing hackney carriage ranks or park away from the town centre other than collecting pre-booked customers.

2.4.11 Private hire vehicles will only be permitted in the town centres to collect pre-booked customers.

2.4.12 An Appendix will be added to this Policy outlining the areas considered as a 'town centre' for the purposes of this section of the Policy at the appropriate time.

OR

OPTION THREE

2.4.10 The Council will seek to establish new hackney carriage ranks in town centres that will be limited

to use by electric, hybrid or ultra-low emission (uLEV) vehicles only; these ranks will have electric charging facilities. All other hackney carriages will have to use the existing hackney carriage ranks or park away from the town centre other than collecting pre-booked customers.

2.4.11 Private hire vehicles will only be permitted in the town centres to collect pre-booked customers.

2.4.12 An Appendix will be added to this Policy outlining the areas considered as a 'town centre' for the purposes of this section of the Policy at the appropriate time.

Vehicles are substantial investments for taxi drivers, you will be putting a significant numbers of owner drivers at a disadvantage by introducing these restrictions. Also the technology and infrastructure is not in place to enable this. this needs to be phased in.

Environmentally Friendly Fleet

2.4.13 The Council is aware of the Government's intention to introduce a ban on the sale of new petrol, diesel and hybrid cars in the UK by 2035 at the latest.

OPTION ONE

2.4.14 From 1 January 2028 all new vehicles must be ultra-low emission vehicles (uLEVs).

2.4.15 Existing licensed vehicles will be able to continue to be licensed, subject to section 2.4.16 below,

until such time as they are replaced at which point they will be considered to be a new vehicle and must comply with section 2.4.14 above.

2.4.16 From 1 January 2035 no petrol, diesel or hybrid vehicle will be licensed by the Council.

OR

OPTION TWO

2.4.14 From 1 January 2028 all new vehicles must be ultra-low emission vehicles (uLEVs).

2.4.15 Existing licensed vehicles will be able to continue to be licensed, subject to section 2.4.16 below,

until such time as they are replaced at which point they will be considered to be a new vehicle and must comply with section 2.4.14 above

2.4.16 From 1 January 2028 no petrol, diesel or hybrid vehicle will be licensed by the Council.

OR

OPTION THREE

2.4.14 From 1 January 2028 all new vehicles must be electric vehicles.

2.4.15 Existing licensed vehicles will be able to continue to be licensed, subject to section 2.4.16 below,

until such time as they are replaced at which point they will be considered to be a new vehicle and must comply with section 2.4.14 above

2.4.16 From 1 January 2035 no petrol, diesel, uLEV or hybrid vehicle will be licensed by the Council.

OR

OPTION FOUR

2.4.14 From 1 January 2035 all new vehicles must be electric vehicles.

2.4.15 Existing licensed vehicles will be able to continue to be licensed, subject to section 2.4.16 below,

until such time as they are replaced at which point they must be replaced with either an electric or uLEV.

2.4.16 From 1 January 2035 no petrol, diesel, uLEV or hybrid vehicle will be licensed by the Council.

Options 1 – 3 are not practical and will subject all businesses to significant cost of replacement. Especially when everyone has been hit hard by the current pandemic. Option 4 seems to fit with the Governments timeline and gives flexibility to businesses enabling to plan.

2.10 Licence plates

2.10.1 For the avoidance of doubt a licenced vehicle is always a licenced vehicle including when being

used for private purposes. At all times when a vehicle is licensed as a hackney carriage or private hire vehicle, unless an exception has been granted under subsection 2.10.4, the vehicle must display the licence plate provided by the Council, securely fixed externally in a prominent position on or above the rear bumper of the vehicle. Plates attached by magnets must not be removed when the licenced driver is not working at any time, save for when parked overnight outside the driver's home.

2.10.2 At all times when a vehicle is licensed as a hackney carriage or private hire vehicle, the vehicle must display the internal vehicle licence plate provided by the Council, securely fixed to the upper left of the windscreen (passenger side).

Taxi's are often the target for crime (Theft or vandalism) due to perceived cash stored within it or just general grievances. I see no benefit of identifying it as a taxi at all times, as this just increases the risk. Crime does happen during the day also !

C.4.3 Any property found that is not identifiable to a passenger and not subsequently claimed within seven (7) days should be reported to the police and/or left in the custody of a police officer after obtaining a receipt. If advised to do so by the police, the licence holder can retain the property for the period advised by the police or taken to the Council offices.

Just for information, the Police will not take any lost property that is not identifiable.

Regards

Nafees Khan