

Licensed Private Hire Car Association

56 Austins Mead, Bovingdon, Hemel Hempstead, Herts. HP3 0LH
Tel: 01442 833464 Chairman Mobile: 07956 329288
E-mail: office@lphca.co.uk Chairman Email: steve@lphca.co.uk
Web: WWW.LPHCA.CO.UK



Council Leader Bridget Smith
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge CB23 6EA

Also sent to:
Chairman of Council
Head of Legal
Head of Licensing
Licensing Committee Chairman

27th November 2019

Dear Councillor Smith,

Subject: Hackney Carriage & Private Hire Licensing Policy & Conditions Proposals (December 2019)

I am writing to request South Cambridgeshire District Council ("SCDC") **rejects or otherwise does not approve or adopt** the proposed 'Hackney Carriage & Private Hire Licensing Policy & Conditions' on 28th November 2019.

The Licensed Private Hire Car Association ("LPHCA"), are national private hire trade representatives, who submit this request on behalf of, and in support of, affected members in the district. This includes the South Cambridgeshire Executive Operators Group ("SCEOG").

We, like them, have serious misgivings about SCDC's (a) *consultation process*, (b) *resultant report* and (c) *final proposals*. By way of example, attention is drawn to the following:

- (1) In respect of the consultation, **SCDC has failed to consult, in any way, on the blanket removal of private hire operator licences for businesses based outside the district.**
- (2) In respect of the report, **SCDC has failed to give due consideration to stakeholder consultation submissions, redacted aspects of those submissions and unduly relied upon SCDC Licensing Officer opinion.**
- (3) In respect of the proposals, **SCDC has failed to satisfy Information Commissioner Office (ICO) guidance and Surveillance Camera Commissioner (SCC) codes of practice on CCTV (and dashcam) requirements.**
- (4) **In general terms policy not proposed or covered in the consultation process would be introduced.**

Additional detail on our concerns, as expressed in our original consultation response, can be found in the attached letter dated 16th September 2019.

We are acutely mindful these complaints imply serious legal questions as to the *general fairness, impartiality, procedural propriety and reasonableness* of the proposals. It furthermore raises wider *accountability* concerns about the *transparency* of SCDC as a licensing authority.

In light of the above, I would welcome the opportunity to meet with SCDC officials to discuss how workable solutions may be achieved on these proposals.

Yours sincerely,

Steve Wright MBE LPHCA Chairman

Licensed Private Hire Car Association

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Tel: 01442 833464 Chairman Mobile: 07956 329288
E-mail: office@lphca.co.uk Chairman Email: steve@lphca.co.uk
Web: WWW.LPHCA.CO.UK



Taxi & Private Hire Vehicle Licensing Team

DRAFT

South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge CB23 6EA

16th September 2019

Dear Licensing Team,

South Cambridgeshire District Council (SCDC) - Taxi Policy Consultation

Thank you for consulting on Taxi Policy with a wide-ranging consultation and for hosting a Taxi Policy Consultation Event, which I was delighted to attend and meet so many of you at.

I am responding to your consultation as Chair of the Licensed Private Hire Car Association (the LPHCA), a national Trade Association for Operators of Private Hire Vehicles and Taxi services, with over 250 operator members from Portsmouth to Glasgow.

Overview

As previously advised I was contacted by executive private hire service providers (SCDC licensed operators) who had major concerns about some of the proposals in your consultation. I initially visited Cambridge on the basis of helping them and they subsequently formed The South Cambridgeshire Executive Operators Group (SCEOG).

This group is autonomous but has now affiliated to the LPHCA for guidance and support from myself and the Association. To that end, I have now visited Cambridge on numerous occasions and the SCEOG will be sending in their own considered submission, independently of the LPHCA's submission, which follows.

Our mandate has been to help them engage with you, to respond constructively to your consultation and to collectively work in harmony with you for the delivery of sensible regulations that ensure safety for drivers and the travelling public.

As previously advised I was afforded a great deal of courtesy and time at your Taxi Policy Consultation Event and managed to gain a lot from my visit with those involved from SCDC.

It was also helpful that we met with you following my request to meet you with SCEOG colleagues to discuss matters to enable your team to consider concerns and suggestions from the group and myself. Although the meeting had 3 different people to deal with at different times I feel it was beneficial to us, even though your colleague Jane Jackson (your Resource Team Leader) was unwell and therefore unable to attend.

Our response is as a national organisation extremely experienced in working with safety groups, operators, licensing authorities, alongside local and national government to deliver good regulations that work for all.

We will be forthright with our responses and constructively critical where we believe there are shortcomings, having said this, our responses are sent in the spirit of being helpful and collaborative.

Please consider the above Overview as part of our formal response to the actual consultation, which continues below.

Consultation structure and process

South Cambridgeshire District Council (SCDC) has produced a decent consultation and endeavoured to engage with the trade in an open and transparent manner. The documentation is well indexed and easy to follow however there are some considerable problems therein, which for potential responders are confusing at best and quite perplexing if you are not very familiar with previous policy.

Timing of the policy review

A key point to make at the outset is regarding the timing of the policy review and the potential policy introduction date. With government ministers considering National Standards, CCTV and consulting on replacing existing Department for Transport (DfT) Best Practice Guidance with Statutory Guidance, alongside your policy having been updated in 2018, it seems very odd to be proposing to introduce new policy in December 2019, especially as December is the busiest time for the industry and passenger trips.

Reference to a handbook not yet finished

Your proposal document well-over 40 times refers to the Hackney Carriage and Private Hire Handbook for details, without actually saying what the handbook is or how or where it can be obtained. As many, including the LPHCA, are looking at the online documentation, this renders it impossible to form a considered opinion on many matters in the consultation proposals without sight of this handbook.

At your Taxi Policy Consultation Event, I sought a copy of the handbook, only to be advised it was not ready prior to the consultation, which of course renders swathes of the consultation impossible to comment on in a 'learned' manner.

I mentioned that I had been given a copy of policy dated 2017 and referred to my not seeing or being able to access the referenced Handbook. Jane Jackson your Resource Team Leader subsequently kindly sent me the most current policy document in a series of PDFs, dated 2018 and advised that 'This policy replaces all previous Handbooks'.

This of course, with the timing issues referenced previously, makes bringing in major new policy, completely inappropriate as the consultation is undermined without the handbook it refers to throughout.

Notwithstanding the aforementioned, I have read the existing (2018) policy, which appears to be fairly sound and this could be a basis to work from but the consultation process without the handbook it refers to, is with respect, flawed.

In light of this alone I do not believe SCDC has consulted effectively enough to bring in serious policy changes in December 2019, without further consultation and trade discussion.

Proposed way forward

As mentioned in the overview we will be forthright with our responses as well as constructively critical and our response is sent in the spirit of being helpful and collaborative.

To this end, I have responded on the primary matters of concern, that I have identified from the proposals and feedback from the trade, alongside my own knowledge of what has worked well elsewhere. These are set out below and were forwarded then discussed as part of our meeting with SCDC on 4th September.

- Signage in/on Private Hire Vehicles
- CCTV
- Vehicle Ages
- Emission requirements
- Exemptions
- The Wider Consultation (Covered above)

Signage in/on Private Hire Vehicles (including branding)

The LPHCA has a long-standing belief and much evidence that there should be very little signage on Private Hire Vehicles for proven safety reasoning, including the confusion of the travelling public. Furthermore, the fact that Private Hire Vehicles (PHVs) are just that - Privately Hired Vehicles, is often lost on many.

It is a fact that the more signage you put on a PHV, the more it looks like a taxi and the more the public are confused, especially in licensed areas where traditional London style taxis are not utilised and the same vehicle can be licensed for taxi or PHV usage.

For this reason, regulatory signage on PHVs should be discreet, and the number plate should be the primary thing that a passenger looks for, not a licensing plate, door stickers, branding or other identifiers.

As the London Private Hire Car Association, we worked very hard with the Public Carriage Office in London on appropriate signage on PHVs, prior to licensing in 1998. We spent 2 years with other trade bodies agreeing to 'hologrammed' screen discs front and back that contain all the licence details, which very importantly can be seen from the outside of the vehicle.

With government currently constructing a taxi and PHV database that will carry that information in real time there will be even less reliance on such a disc.

We know that horrendous sexual attacks, robberies and assaults have taken place when unsuspecting members of the public have been lured into danger by false signage on vehicles that are not-purpose built like London taxis.

Branding

After many years of success with the screen disc system in London the question of what branding as opposed to regulatory signage could be allowed on PHVs was asked. It was resolved that almost no company branding would be permitted other than on the rear of vehicles, to ensure that PHVs were not hailed and mistaken as publicly hireable taxis.

Rear windscreen signage that meets light and opacity regulations was agreed upon, alongside MOGO number plate type attachments and approved sign-written company branding (all rearward facing). This has worked very well and there is no evidence to suggest otherwise, most importantly PHVs are far less likely to be mistaken as being taxis and members of the public are not likely to be confused.

Disc System and even greater safety

The disc system has been in place for over 15 years now in London and we estimate that well over 1 million have been issued (at the vehicle licensing point).

In addition to the fact that new government vehicle database is coming online, Transport for London (TfL) have regulated that Private hire operators must provide a booking confirmation to a passenger before their journey starts.

The operator is expected to request passenger contact information and offer to provide a booking confirmation for all bookings.

All operators must (at a minimum) be able to provide a booking confirmation to passengers via email, text (SMS and MMS) message and phone (regardless of what booking channels the operator offers). The booking confirmation must contain, as a minimum:

- The vehicle registration mark
- The first name of the driver
- The driver's private hire licence number, as shown on the ID the driver is wearing
- Where the passenger can receive it, a photo of driver

Where the customer books in person or by landline phone, a photo must be provided if the customer requests confirmation through a communications channel that can provide an image, for example an email or smart phone.

All this negates the need for confusing and in some cases very dangerous signage on vehicles that we know can be copied and used to confuse unsuspecting members of the public. From the Chauffeur and Executive perspective many corporates do not wish to have the company their staff are travelling with identified for aesthetical and security reasons.

Prosecution for false signage and badges

LPHCA research has revealed that in April this year (2019) a bogus cab driver used stickers to trick potential customers into thinking he was in a legitimate private hire vehicle. He also stuck no-smoking signs in the front windows of a dark-blue Vauxhall Zafira.

Fortunately, he was caught by council licensing officers and prosecuted by Southampton Magistrates' Court.

In 2017 'fake' South Cambridgeshire taxi drivers' badges were seized in an investigation which involved police in Buckinghamshire following the discovery of a fake taxi drivers badge purporting to be issued by you - South Cambridgeshire District Council. This prompted a police investigation into fraudulent taxi licences and a South Cambridgeshire vehicle plate was also seized.

False signage and badges have often been used to aid and abet criminal activity and with modern technology, police and enforcement teams can now check in real-time, as they do with road tax nowadays. With the DfT & DEFRA taxi & PHV database being constructed, which will identify the registered keeper, the licensing authority, date of licensing, etc., alongside the customers ability to check in real time with the company booked with, anything other than basic signage is unnecessary.

We know that the more you put on a PHV the more likelihood there is of illegal activity, including touting, bogus cabs and far worse. Some naively believe that putting 'pre-booked only' on doors helps but this does not help tourists or others who don't understand written English, it only serves to confuse. Council crests can be copied, as can branding and magnetic door signs, which can easily be removed by a criminal for potentially very sinister use.

Executive & Chauffeur Vehicles Signage

The case for discreet signage on executive vehicles is even more compelling because such vehicles are not utilised for street hiring's. Typically, but not exclusively, Executive & Chauffeur Vehicles are utilised for corporate work or executive business that may have emanated by recommendation or website promotion.

Street bookings are a rarity for Executive & Chauffeur Vehicles and in some cases never happens. The more discerning customers that utilise such specialist services in nearly 100% of cases book such vehicles well in advance.

If SCDC adopted the successful London signage model it could also be utilised by the wider Private Hire Vehicles you licence that has been so effective in the capital. Executive & Chauffeur Vehicles in London and in general all PHVs have accepted the Screen Disc option alongside the new operator requirements as the norm and it works well because it is discreet.

With government constructing the new Private Hire and taxi vehicle database, not only will safety improve because passengers with smart devices will be able to check in real-time, alongside the police, licensing & compliance officers, who will also have access to all the required details too.

Our response to signage and branding is that 'less is more', so please seriously consider the London Screen Disc and branding model not only for Executive Vehicles but for all PHVs that you licence. The public will be less easily confused and much safer.

Internal signage in PHVs is also a bad idea, as it can be fraudulently copied and used to entice a passenger into a vehicle and a potentially dangerous situation. With 'self-destruct on removal' screen discs, the practice of issuing things like a licensing information card, that can easily be replicated, removed by passengers and I understand, in the main gets stored in the glove box anyway, is negated.

All the Executive drivers I have spoken to in SCDC have said that the plate exemption you currently utilise should not be radically changed unless a screen disc option comes into place.

Finally, I think it useful to point out that vehicles especially for executive use, nowadays for very good business and environmental reasons, work for multiple companies. It is therefore not a good idea to tie vehicles or drivers to companies, especially as this can compromise their self-employed status. Working for multiple companies, increases the earnings potential and has considerable environmental benefits as drivers that are available to multiple operators have reduced dead mileage.

Executive & Chauffeur Vehicles Signage Position – Improve what you already have for Chauffeur & Executive, consider screen discs and far less signage more widely on PHVs, so they are not confused as taxis.

CCTV

The case for CCTV in Executive & Chauffeur Vehicles in particular and more widely in Private Hire Vehicles is controversial, unproven and subjective. Whilst there is slightly more of a case for publicly hired taxis as no independent record (unlike under PHV regulations) or tracking is assured, the Surveillance Camera Commissioner's response to the Department for Transport consultation on statutory guidance for taxi and private hire vehicles for licensing authorities makes significant points.

I have put our comments in bold below the Surveillance Camera Commissioner consultation response and I have put the full link at the bottom of this section in italics.



Surveillance Camera Commissioner consultation response to the Department for Transport consultation on statutory guidance for taxi and private hire vehicles licensing authorities.

1. The Surveillance Camera Commissioner welcomes the opportunity to provide input into this consultation on statutory guidance for licensing authorities with regard to taxis. He has worked with the Department for Transport in development of the draft guidance that was issued for consultation.

2. The Commissioner recognises that it refers local authorities to the Surveillance Camera Code of Practice. The Protection of Freedoms Act 2012 (PoFA) s.33(5) sets out that they must pay due regard to the code. It is also encouraging that the guidance refers to a number of the tools the Commissioner has issued to help organisations comply with the 12 guiding principles in the code. As relevant authorities under PoFA, local authorities must be made aware that if they do not pay due regard to the code this is admissible as evidence in court. The Crown Prosecution Service revised their Disclosure Manual in December 2018 to reflect this.

3. That said blanket licencing may be disproportionate and should only be used where there is a strong justification as set out in paragraph 1.15 of the code:

When a relevant authority has licensing functions and considers the use of surveillance camera systems as part of the conditions attached to a licence or certificate, it must in particular have regard to guiding principle one in this code. Any proposed imposition of a blanket requirement to attach surveillance camera conditions as part of the conditions attached to a licence or certificate is likely to give rise to concerns about the proportionality of such an approach and will require an appropriately strong justification and must be kept under regular review.

LPHCA COMMENT - In section 3.9 CCTV you state:

i. The installation of CCTV in licensed vehicles can be both a deterrent to would-be troublemakers and a source of evidence in the case of disputes between drivers and passengers, other incidents and accidents.

We question whether a lot of this is accurate and ask what evidence, especially for Chauffeur & Executive and basic pre-booked and often tracked PHVs do you have for SCDC?

Recent media footage has shown CCTV has not acted as a deterrent on busses, tube stations and main line railway, where murders and serious assaults have occurred. As PHVs are pre-booked we are not convinced that the cost of installation, maintenance and overheads a) are necessary, b) proportionate and can therefore be reasonably justified.

As well as this we would like to know if you conducted a formal regulatory impact assessment to cover costs to drivers, operators, SCDC and ultimately to the fare paying passengers.

In addition, what have you done to directly engage with businesses and passengers, who may well object?

At our recent meeting on 4th September we were asked by your goodselves to evidence how Chauffeur & Executive passengers would regard CCTV and we are now compiling the responses from Cambridgeshire businesses and expect to have them within 28 days of your request. Evidence gathered to date shows total resistance to CCTV being in place in a Private Hired Chauffeured or Executive Vehicle.

ii. The key objects are:

- The protection of licensed drivers.
- The protection of the travelling public.
- To ensure that licensed drivers continue to be 'fit and proper' in line with licence conditions.
- To enable investigations to be fully supported with evidence in a secure and retrievable form.

To understand the necessity for the protection of licensed drivers and the travelling public in SCDC are you able to provide statistical information on previous problems in PHVs please?

We have grave concerns regarding the bullet point that licensed drivers continue to be 'fit and proper' in line with licence conditions via CCTV surveillance as being reasonable and proportionate.

iii. All Hackney Carriage and Private Hire vehicles must be fitted with an approved CCTV system no later than 30th November 2020.

This seems to be a blanket policy and as stated above should only be used where there is a strong justification.

4. *The Commissioner is aware of the blanket requirement for taxis in Rotherham to have CCTV installed. This was one of a number of measures implemented following the child abuse issues in the Town where taxis were used to transport a number of the victims. Here there was persuasive evidence to argue sufficient justification but the Commissioner would not expect widespread installation of CCTV in taxis without well evidenced justifications. The local authority's Senior Responsible Officer for compliance with PoFA and the code will be able to advise on justification requirements for CCTV.*

In Rotherham, we understand there were major failings at Council Licensing & Enforcement level.

5. *Furthermore, CCTV in taxis typically also records audio (as well as video). The recording of conversations is extremely intrusive and requires strong justification as set out in paragraph 3.3.2 of the code:*

Any proposed deployment that includes audio recording in a public place is likely to require a strong justification of necessity to establish its proportionality. There is a strong presumption that a surveillance camera system must not be used to record conversations as this is highly intrusive and unlikely to be justified.

It is clear that customers do not want to be voice recorded

6. *A key part in the process for justifying a surveillance camera system is consultation. The Commissioner would expect to see clear evidence of public consultation before any final decision about installation is made. This consultation should involve members of the public, taxi drivers, police and any relevant regulators.*

Whilst you have clearly consulted via the proposal document, what direct level of engagement has been done with passengers and businesses by you on CCTV?

7. *Local authorities must also have completed a data protection impact assessment prior to installation and have consulted their data protection officer and legal teams. There is a surveillance camera specific DPIA template on the Commissioner's website which was developed in conjunction with the Information Commissioner's Office.*

Has this been done and if so is it available?

8. *Where it is the case that taxi drivers use the vehicle for their own private use the Commissioner would expect there to be a facility to switch off recording. In addition, there must be clear policies and procedures in place regarding how the CCTV system is used and who can access the footage it records and where CCTV systems are IP enabled (connected to the internet) then they must be cyber secure.*

Is this in place and applicable – the consultation does not appear to have covered this?

9. *The Commissioner would recommend that installation of any system should include a full operational requirement which can be achieved by using the Commissioner's Buyers' Toolkit and/or Passport to Compliance documents. This will ensure that a system is installed that is fit for purpose and actually delivers footage that can be used in court if required. Whilst the Commissioner appreciates the austere times that local authorities are working in, he would not expect that substandard systems are installed to save money particularly if the justification of the system is passenger and driver safety.*

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/798087/SCC-taxi-consultation-response-DfT.pdf

Vehicle Ages and Emission Requirements

LPHCA COMMENT - In section 3.6 Age of Vehicle you state:

i. As an incentive for the uptake of zero and ultra-low vehicles within the Hackney Carriage and Private Hire Licensing Policy and to comply with the South Cambridgeshire District Council's recognition of the global climate and health emergency action plan to deliver a zero-carbon future for South Cambridgeshire, it is required that:-

- A new vehicle licence will not be granted in respect of a vehicle unless it is less than 4 years old.
- A vehicle licence will not be renewed for a petrol or diesel vehicle unless the vehicle is less than 7 years old.

ii. To incentivise investment in ULEV and Zero Emission Vehicles, this rule will be extended as follows

iii. A vehicle licence will not be renewed for an Ultra-low emissions vehicle unless the vehicle is less than 12 years old.

iv. A vehicle licence will not be renewed for a zero emissions vehicle unless the vehicle is less than 15 years old.

This policy proposal, whilst well intended I do not believe will achieve the objectives you seek in i. above.

The regulatory impact will in my view be extremely disproportionate on different companies and different drivers in several ways for many reasons. The proposal presumes that 'age of', is better than 'condition of' and / or 'specification of' vehicles as the way forward.

I do not believe this will achieve the objectives you seek to achieve in i, as there are in my view many unforeseen consequences that a thorough regulatory impact assessment will highlight.

Age requirements

Age is a flawed method of determining the suitability and condition of a vehicle, so we are surprised that this method is being utilised, especially as SCDC already has in place, as set out in section 3.10 Vehicle Testing the following:

i. The vehicle must have an MOT certificate and a Certificate of Compliance that is no older than 1 month at the date of application for both new and renewal.

ii. The Certificate of Compliance will be issued for six months and a second test must be carried out 6 months minus 1 day from the last test.

As a former qualified mechanical engineer and operator of thousands of vehicles I can assure SCDC that the above policy is the right way to determine fitness and suitability of a vehicle, not age. It is the condition of a vehicle, not the age of the vehicle that is important and your Certificate of Compliance (COC) system that you already have, is in our view the correct measure.

A well-maintained older vehicle will mechanically almost certainly be in far better shape than a poorly maintained newer vehicle. Your COC deals with this aspect fully, without needing tick-box 'age-based' criteria.

You will be aware that primary regulation already permits more frequent testing for older vehicles, which is a far better option than a blanket age policy that could refuse or fail a perfectly suitable vehicle.

Importantly, specialist vehicles as used by Chauffeurs and Executives, as well as accessible / special needs vehicles are far more expensive. Some will have been purchased for a lengthy lifetime of work, often at great cost, in some instances over a long 'pay-back' period for the operator or the driver.

To enable owners of such vehicles to transition into their next vehicle they will need to repay outstanding payments and earn the money to do that, so they can move into the next generation of environmentally friendlier vehicles, which we will cover below.

SCDC is not alone in believing that integrating taxi and Private Hire licensing into its Air Quality Improvement strategy is prudent. There are however considerable issues in transitioning for both taxis and PHVs. If age limits are brought into the equation this is further complicated and we assert that Air Quality standards are a far more reliable basis for taxi and PHV than age limits.

Environmental considerations

Understandably Local Authorities are rightly looking at all possible ways to improve 'Air Quality' as soon as possible. The LPHCA has regularly been attending the Joint Air Quality Unit (JAQU) sessions with the Department for Transport and DEFRA.

As part of JAQU's strategy a national database is being created by government to help Local Authorities determine whether taxis and PHVs meet the particular emission standard for their vehicle type in Clean Air Zones (CAZs) in major cities in England & Wales.

To complicate matters, some cities are opting in and others opting out, furthermore the government has delayed the introduction of the database until at least July 2020.

The principle of improving Air Quality by Euro Standards and Fuel Type and the associated harmful particulates is sound and in London this has trumped determination by age.

Manchester like SCDC, also sought to tie in standards policy with air quality requirements but has now postponed doing so and the following statement was issued by John Garforth, JP, MIOL Chair – GM Licensing Network.

In 2018, Greater Manchester's 10 local authorities agreed to collectively develop, finalise and implement a common set of minimum standards for Taxi and Private Hire services licensed in Greater Manchester. The proposed standards have four areas of focus: driver standards, vehicles standards, operator standards and local authority standards.

Greater Manchester Leaders have consistently stated that these standards must align with the Greater Manchester Clean Air Plan proposals and support the requirements to tackle air pollution across the region. The 10 local authorities are awaiting feedback from government on some elements of those proposals, most notably the funding available to support vehicle upgrades – including taxis and private hire vehicles (PHVs).

With this uncertainty, and the lack of clarity around the Government's intention to legislate for national minimum licensing standards for taxis and PHVs in the future, there will be no consultation on the proposed Greater Manchester common minimum standards this autumn, however we will continue to engage with the trade on the development of both Clean Air Plan and common minimum standards.

What is clear is that many regional and Local Authorities are determining their standards for taxi & Private Hire via Euro Standards and Fuel Type and not by age. This in our view is not only sensible but Best Practice.

With National Standards now being discussed by Ministers and cited as a priority Post-Brexit at DfT meetings I have recently attended and with Low Emissions Standards coming into place, it would seem sensible to make taxi & PHV licensing policy going forward based on defined standards rather than criteria like age of vehicles.

The taxi and PHV industries will need to transition into more environmentally friendly vehicles in a cost-effective and achievable manner, especially for specialist vehicles as used by Chauffeurs and Executives, as well as accessible / special needs vehicles, which as previously mentioned are far more expensive.

Infrastructure, vehicle availability, scrappage schemes and grant money, all needs to be determined to enable a smooth transition and the avoidance of supply shortages.

In summary, it is not in our view timely to introduce age limits or be too prescriptive with new regulations at local level until government has determined new national standards, which we believe in most cases should be 'absolute' and not minimum.

Exemptions

I have been privileged to work with safety groups, trade bodies, politicians, ministers and government officials at local and national levels on taxi & PHV licensing. I have also been fortunate to work with the

Law Commission on its wide-ranging review of taxi & private hire, as well as being on the government's recent task and finish group.

Along the way, I have learnt that all good regulations are considered thoroughly, but most importantly have within them the ability to empower regulators to make exemptions and have flexibility for officials to have discretion to make alternative arrangements where sensible.

I wish to thank SCDC for the courtesy, consideration and assistance shown in this consultation exercise.

Yours sincerely,

Steve Wright MBE LPHCA Chairman

