

Consultation Comments 2020

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1. Overall Proposed Policy

A. Driver	No more private hire taxi licence No more hackney
B. Driver	Against
C. Driver	It's not fair to impose new laws on drivers and make their living hard no door mandatory and in vehicle sign don't make any sense
D. Operator	These "proposed" new policy regulations will have a detrimental effect on the sustainability and growth of the EXECUTIVE CHAUFFEUR SERVICES in Cambridge. It is already impossible to attract new people due to the overregulation of this service and being treating as a taxi service. It therefore will reduce the options and competition for local commerce and industry, which is contrary to the recommendations of the MCA.
E. Operator	Good afternoon, I think the new proposal is valid to protect and put good professionals to work and serve the community, but is getting too expensive to drive and run a business in Cambridge
F. Operator	Policy is restricting trade and inhibiting business viability. It contradicts itself in several places and sets out timescales and regulations which are unrealistic and in some cases seemingly arbitrary.
G. Driver	The new proposed rules are not fit for every 1
H. Driver	It is all rubbish and you people have nothing els to do other than just trying add more stress and more money and more headache on us YOU ALL work for us so find better things to do and save us money and time, it is all for a big WOW when you want to talk about it later to others thanks
I. Driver	Not happy with all policy
J. Driver	Putting drivers into financial difficulties by trying to introduce new rules shouldn't be the aim of the council. All of these new rules have costs involved which would be the drivers responsibility. I find it unfair and irresponsible.
K. Driver	Absolutely support all proposals
L. Resident	I agreed with all proposals
M. Driver	Dear sir.i am as a private hire taxi driver not agree with your new policy cause it's going to be so much burden for the driver as you know the taxi business going down day by day.its because so many new drivers coming from different places and working in Cambridge also new companies coming here.thanks
N. Business	I dont want them.coz they shoukd stay where ever they take liecence.its not fair who give lots of think over here
O. Resident	I agree with all proposals
P. Business	I strongly support all proposalsJ,
Q. Driver	Changing policy with out any reason that effective negatively for thus people providing services for the customer in Cambridge, this is unfair if you compare with other cities like London, for example Uber driver in London, they haven't use a pleat and other staff like . They use just a badge. And you every short time make new policy, please go to another problem to solve. I'm thinking to live this job if you do this new policy.
R. Driver	So basically with all these new regulations you trying to make people's lives more difficult? or you just trying to make money? Maybe some of you can afford to get a brand new car every year but in real life taxi drivers are not swimming in the money!
S. Driver	All below changes will help investor who gives car on rent, as difficult for new or poorer driver to buy any car, it will force driver to get on rent either from or somewhere else , speically from Cambcab which they used Wolverhampton council taxi which have very low required

	for taxi licensing i strongly disagree all of them
T. Operator	<p>So there is certain proof written above that there are 3 Drivers in the travelling market because there are 3 specifications needed to apply for And that's not all ! As an Executive Driver I am more obliged to give not only my driving experience and comfortable travelling services but anything else to within reason my passengers ask of me, I am always on time for them and when I am unable to drive myself, I always get cover from a source of Executive drivers who can rely on and give my passengers exactly what I give and my passengers are so grateful the lengths I go too to get them the best drivers available and they trust my judgment rather than a taxi driver And if my passenger are running slightly late themselves I do not have a metre running or charging them extra LIKE A TAXI DRIVER DO! And I do not even Charge a percentage fees like other companies I am so lucky to have the best helping me I am just grateful of this and my bonus is that my passengers always come back to me because I have given the best service.</p> <p>Please forgive me if my grammar is not correct BUT in all the jobs I have done in my time not one of them has wanted as many emails and correspondence as you guys request and to be honest I'm not that clever with this kind of correspondence but what I say comes from my feelings</p> <p>But what I do know is that S.cambs are slowly demoralising me from doing the thing I love to do well and it is only my customers friendship I have made along the years I have been driving them and their companies and their families and friends and strong relationship I have built up that keep me going driving in the rain,snow and heavy motorway queues ! I will always be there for my passengers in trousers and shirt and tie if required that is.</p> <p>My customers have chosen me because of who I am and how well I drive and what good service I bring to them,So if they want me to turn up one day in jeans and to give them some help with personal stuff when I get them safely home or to the office then I will turn up in Jeans so if I am reported wearing jeans look out for the backlash. And again I repeat myself again and again YOU DO NOT UNDERSTAND THE EXTRA MILE I/WE EXECUTIVE DRIVERS GIVE to our to our wonderful passengers AND that's just not the taxi driver way. In January 2020 a passenger I collected from Peterborough Railway Station to drive to Stevenage (who I'd never met before in my life) to join the company I drive for on a regular basis said she was worried about her short travel and having to get a taxi at the station but then all her fears had disappeared because Eppendorf said that we'll have a word with Wayne will be there for you ! That's the service I give to my passengers and the companies that employ me! And taxis don't do that! They don't give the confidence I give! I am also making people at ease more the talking in confidence with me and how they felt when I explained that the council want us to install cctv in the car and as I said very mixed views indeed .</p>
U. Operator	<p>But there is so much i still dont undertsand in you drafts, even when i read it, it gets more confusing for me like d)</p> <p>c) All new Hackney Carriage and Private Hire vehicles must be fitted with a Council approved CCTV system at application no later than 31st March 2021. Please see the Hackney Carriage and Private Hire Handbook for details.</p> <p>d) Drivers, proprietors and operators must notify this Licensing Authority prior to installation. They must be registered with the ICO (Information Commissioners Office) if required and comply with all aspects of data protection and CCTV codes of practice, including clear signage that the vehicle uses CCTV. Further information can be found on the following link https://ico.org.uk/. Does d) also apply to ALL Private Hire Taxi drivers ref obtaining a ICO yes or no and if no why ?</p> <p>Can you please explain Yes or No to the questions below because call me Mr Thicky but no matter how I read it I do not understand still what it means?</p> <p>I can understand your point about the safety factor for CCTV but i believe there is a thin line and i am struggling here I do hoever belive a town taxi car should have one installed from my experience of friving as a taxi But my work now is so so much different.</p>

	<p>It seems to me that people that make the rules do not have the same connection with people like i do, And i strongly believe that the there is an alternative motive here and that is to make Cambridge a 1 or 2 taxi comapny town YOU NEED TO SEE THE DIFFERENCE BETWEEN ME AND PANTHER CABCO and CAMCABS I AM HIRED BECAUSE I AM SPECIAL AND I UNDERSTAND WHAT PEOPLE WANT IN THERE TRAVEL AND I AM HERE AS A CHOICE AND NOT FORCED UPON THEM If people want a taxi they will book a taxi If people want a multiseated vehicle they'll book a multi seat taxi If people want a professional long haul executive driver they will book me or another executive driver ! It seems to me that the council have not listened to one word what executive drivers have been saying and only make your deals with the Cambridge taxi companies I'm totally fed up to the back teeth with what you council and send letters for this and that ! let me do my work please 25 years i have been driving for members of public and executive clients DO know what my passengers want and search for in privacy and professionism</p>
V. Driver	Not happy with all policy
W. Driver	Totally unfair and disagree.
X. Resident	<p>Just two things you need to add to this consultation is ensuring all drivers are disability aware and know how to help. I've had one superb Cambridge driver and one from Suffolk up to date and know how to help. Although are some who aren't and some have poor grip of basic English. The problem also is almost all new vehicles at ranks are low height mini vans which I struggle getting in and out so I prefer a car. When I book with Panther using the app in Cambridge under the type of vehicle to car and put VP in the comments box. What I also would like is the taxi card come out to Linton / Balsham. From say Mill Road it can be £21-£25. It would be nice and more fair if someone like myself on esa and pip get a taxi say for that distance say £15-£20. Basically more consideration for disabled but a better fare (fixed) for disabled and get more cars back into the ranks. This is not helpful for me almost specifying nearly all taxis have to be that van type vehicle which I've struggled with myself.</p>
Y. Driver	<p>I would to inform you that, I approve all of the proposed changes in Taxi consultation apart from CCTV. With in my personal view I would like to mentioned that CCTV should be on voluntarily basis rather then mandatory.</p>

2. Environmental Issues

A. Resident	As a resident of central Cambridge I am concerned about the impact of diesel taxis on air pollution. Your policy does not seem to propose any measures to tackle this until December 2021. I feel that this is unacceptably slow.
B. Resident	Licence fees for electric and petrol/electric taxis should be reduced and fees for diesel vehicles should be increased, to begin the process of cleaning up the air in Cambridge.
C. Resident	Many diesel taxis in Cambridge are emitting considerable levels of NOx and particulates. Diesel taxis should be tested yearly and dirty vehicles banned.
D. Driver	I have another EV car on order but if this silly ruling goes through I shall have to think again. is there anything the council is going to assist me with on my purchase of another EV, my first I ran for three years had no perks from you as the council, Cambridge City Council offer free licences. Excessive regulation will see a diminished fleet of taxis!
E. Operator	ULEVs..There has to be a reasonable transition period for the exempt chauffeur market to reach the required level of emissions as there are NOT the vehicles available on the market suitable for our level of service. But, our service does not include driving around town, so has very little effect on pollution in Cambridge. WE ARE NOT A TAXI SERVICE.
F. Driver	I have an EV on order and now you have new rules on types of vehicles are you going to match the free licences given by the City Council for all new EV's licenseFs? You mention installing new chargers but it's being covered by government grants, what is the SCDC putting in the pot or is it once again you want all these changes without you paying for anything just put it on low paid self employed people. Have you informed the costs to us to the councilors who will be voting on this?
G. Operator	Has an accurate assesment been made of the environmental impact of the manufacture and delivery of new vehicles and the disposal of old ones against the retention of older (but well maintained) ones? Has the impact of the disposal of lithium batteries been considered (currently no known method of disposal)
H. Operator	Electric or hybrid cars cost more money
I. DRIVER	In regards of zero emissions it still be the drivers choice to have it as of 78%. Vehicles are euro 6 to compliance road and traffics act not really harming the environment
J. Business	Absolutely support your proposal measures for environment.
K. Drivers	Environmental Issues This a National Issue and we think the Taxi Trade is being discriminated.
L. Driver	If the council requires new vehicles, how much the council subsidise the drivers towards the cost of buying fully electric cars?
M. Driver	NOT AGREE• With effect from 1 October 2021: all first time Hackney Carriage and Private Hire vehicle licence applications to be Zero or Ultra-Low Emission.
N. Driver	Ultralow emission car requirements is useless too. The number of cabs compaired to all traffic is very low. Also, PHDs spend most of the working time outside towns. Such policy will impose an extra cost for drivers with no effect on air pollution at all. The proposed policy changes will have no effect for air pollution or the customer happyness. They will only make our business more costly and many drivers force to give up with the job. Then they will need a help from you.
O. Driver	Electric car too expensive to buy and do not have enough charging facilities in the country and they do not give sufficient mileage at per charge also not enough option for electric car.

P. Driver	<p>Environmental Issues and Vehicle Age</p> <p>This is a global Issue and I understand that every business has to take responsibility for less emissions (I personally drive a hybrid for 2 years now) , but please consider the fact that we are self-employed and not all of us drive in town were you can drive Nissan leaf with 80 miles range, but some of us do longer journeys such us Gatwick Airport which is over 90 miles from Cambridge. Not to mention I've had trips to York, Leeds, Manchester and so on. The only electric vehicle capable of such range is tesla and a 4 year old one cost average £40000. I'm doing my best but I don't think I can make profit out of such investment I suggest focus on big companies not the self-employed (whether we're talking about drivers on other business)</p>
3. Drivers	
A. Resident	My feeling is all drivers need compulsory disability training and awareness. There's only a few really geared up drivers. This is even happening when I put VP in the booking notes and from where I normally use them. I give them warning it'll take a couple of minutes to get out but they often park a distance from where I can't see them easily. This is not helpful and a serious area which needs improving as it doesn't help me.
B. Driver	please don't give taxi licence to people out of county
C. Resident	Drivers need better disability training to help recognise the needs of the disabled / elderly more clearly.
D. Operator	<p>Policy states that taxis (and PH vehicles) are used most frequently by vulnerable groups and the policy has been formulated with that basic presumption. Where is the statistical evidence behind this assertion? It certainly does not reflect our customer base or that of other similar PH operators.</p> <p>2.1 h states that renewal of licence should be applied for 8 weeks in advance</p> <p>2.24 states that if you apply for renewal before expiry date of old licence, then your existing licence expires and you cannot drive until a new one is issued. This means that drivers may not be able to drive if SCDC is not able to issue a renewal promptly.</p>
E. Driver	As a driver and proprietor i have had cause to complete your new vehicle application form on more than one occasion and note that this requires extensive information about person convictions/records - surely you have already had this information via the driver application forma and do not need to confuse driver by asking for it on a vehicle application.
F. Operator	Probational period is a good idea Reference for NEW taxi licences is a good idea
G. Driver	Why don't you introduce anything that is protection of drivers? We are not protected if a customer decide not to pay for the service, or we get not enough protection if we get attacked. Police doesn't help at all. Where abouts our safety and wellbeing? Don't forget you make money from us, not from public.
H. Driver	STOP giving licence to people from other locations, outside of Cambridge. We have enough competition and decreased customer demand and increased fees that doesn't help at all. Stop trying to make money by issuing licence to everyone otherwise you will destroy the whole taxi business in Cambridge.
I. Driver	Fit and proper person I find this category completely insulting. I lost my City License due to speeding about 5 years ago. I can acknowledge I needed to be more careful and I have been. But the person interviewing me at City, during the time of that ordeal, mentioned in passing that they had had a speeding ticket too ha ha ha. I understand that they were not a taxi driver. But I am honestly shocked how does one decide what a fit and proper person is? This feels like a completely subjective and spurious category. Of course I want the public/passengers to feel safe and secure in my car. Every human deserves this right. I should know I had to leave

	<p>my own country due to my Kurdishness. However I would also like to see South Cambridge District Council put equal amounts of effort into the safety and security of their drivers. And to make them feel like they are a valued part of the community doing a public service that is of equal value to the employees at the Council and the passengers. To acknowledge that they can also be vulnerable and deserve to be treated with respect.</p> <p>I am a taxi driver trying to support my family. I try my best and am a respectful person as much as the next person. Your rules feel like an insult to my integrity and all the years that I have worked as a trusted driver to so many of my loyal customers which does not seem to amount to much.</p>
J. Driver	<p>I am so sorry but I have read some of the Council drafting that I felt appeals to me but I am more confused now than I was last year with the councils first proposals and to be honest I can't make out much or even if there has at all been any changes that applies to Private Hire Taxi Driver or me. In fact one thing I didn't see was a separation from a Private Hire Taxi Driver and a Private Executive Driver like there is from a Hackney Driver to a Private Hire Taxi Driver.</p> <p>2-2.1(d) This Licensing Authority issues two types of licences for drivers, a Hackney Carriage Driver licence and a Private Hire Driver Licence. These are two separate licences and therefore if any person wishes to hold both a Hackney Carriage and Private Hire driver licence, they are required to submit two separate applications.</p> <p>I have done all my DBS forms which is required by all drivers,</p>
3.1 DBS	
A. Driver	<p>If DBS expire driver should be given chance to apply new one not to cancel the taxi badge as this is their earning becoming job less just because db's system don't Allow direct debit it's not fair on drivers</p>
3.2 Safeguarding	
A. Operator	<p>SAFEGUARDING...As an EXEMPT operator/driver who by definition in our licence can ONLY do "Executive style, Chauffeur work" Therefore we do not pick up or get pre-booked work from the public. SO WHY MUST WE UNDERGO TAXI REGULATION? It has no bearing on our work whatsoever.</p>
B. Operator	<p>Now like i have said,I have paid £60.00 for a Safeguard course which actually I do support and hopefully I will pass this test because I do not want again to lose another £200.00 like I am going to on the 7th by getting my work covered on top of the £60.00 I have paid you</p> <p>Not only that but i feel i am constantly being bombarded with letters from your department but verbal correspondence I have had lately for appointments has been atrocious!</p> <p>I cannot remember exact date approximately September/October i spoke to girl on the phone who told me she had arranged for me to visit the council for 6th of January for a Safeguard appointment but I explained this had already been booked by Brooke for the 7th of February but she said no it is the 6th of January</p> <p>But after speaking to XXXXXX she said the girl had and shouldn't not of told me the 6th and just keep the appointment with XXXXXXXX on 7th</p>

	The 7th January I have just received a letter from the council about my Safeguarding Workshop appointment for the 29th of January I had to ring feeling confused and a bit anxious to say I can't do the 29th and had already arranged with the 7th and Brooke confirmed this But I spoke with XXXXXXXX again and I feel gutted that I was talking to her in a negative manner mainly because I keep getting frustrated with letters and dates that are just confusing me and all I want to do is get on with my work !
C. Driver	The £60 for safe guarding should be waived especially for drivers who have already done it with CCC Not fair. Really does seem like money making making scheme by SCDC
3.3 Competency Test	
A. Operator	COMPETENCY TEST...Yes for a Taxi driver, common knowledge that a taxi must know his local area! An exempt "Executive Style/Chauffeur does not operate within the SCDC area NO TAXI WORK as outlined in our "EXEMPT" licence conditions. So why do we have to undergo TAXI tests/regulations? Completely unnecessary, we drive around the country, all work is booked days/weeks/months in advance, and no monetary transactions, all payments are made by BACs on invoice. So again, WHY DO WE TO BE REGULATED AS A TAXI? This is having a detrimental effect on our business, that is, in getting new individuals to enter our industry, therefore reducing choice for local industry!

4. Operator	
A. Resident	You should move more quickly to mandating that taxi operators must use hybrid and electric vehicles only. The taxi operators are dragging their feet over introducing cleaner vehicles. They are currently having a huge negative impact on air quality in Cambridge. You must force them to adopt hybrid and electric vehicles in order to protect the health of the residents of central Cambridge.
B. Resident	Some operators are using very basically very poorly understanding the different kind of customer. Also some have poor English and or bad driving.
C. Driver	Operators should be penalised for drivers who illegally pick passenger as private hire because those drivers are tricked by operators come work we will give you work and they can't as they are greedy and they have lots of cars then some drivers are doing illegal fares which is wrong companies shouldn't employ more drivers then their clients and if they do and drivers found illegally taking fare then should fine the company
D. Driver	Not happy with all policy
E. Driver	Operators must take full responsibility of all drivers. Too many SCDC drivers are prodomently working in Cambridge with SCDC plate. Loophole permits a job to be covered but its illegal to predominantly work in another borough.
F. Driver	The charges for the operators are unfair. Small operators pay from £100 to £369 , where big operators pay only £510. The council chooses to charge more from the little bussineses .An operator with over 200 vehicles makes millions per year from the drivers, also from every contract they have they charge additionaly.
G. Operator	<p>And I have paid and registered with ICO data protection WHICH I understand does not apply to a Hackney Driver neither does an operating Licence so if he does not need a operating licence then he will not have to apply for a ICO like I do so now we have 3 type of drivers</p> <p>a)A Hackney driver who only need a Hackney Licence and No Operating licence and No ICO registration b)A Private Hire who need only a Private Hire Licence and No Operating Licence and No ICO registration (yet receives private data from the Taxi Company he's employed from to his/hers machine in car BUT to me I believe that the driver is getting data the same as me i.e. name address and there for is warranted to have to pay and register with ICO as I have to) c)Then me, an Executive drive, who needs an Operating Licence and an ICO registration because I receive my information via my email or phone (much the same as his/her as a Private Hire driver machine get via the Taxi Operator)</p> <p>My point here is that although I am an operator, I have to pay the ICO registration for having information of passengers on my system But a taxi driver can obtain the private information about passengers via the Operator given on his or her hand held machine which is mobile with them and quite possible one day can lose and end up in the hands of a complete stranger Whereas my pc is at my home and less likely to end up in the hands of stranger so therefor if we are not being separated from a Private Hire Taxi Driver then a I suggest not only do Operators need to register to the ICO to hold peoples information then the PHTD should also register the same as a Executive Driver because they both hold private data i.e. Addresses and names and contact numbers.</p>
H. Driver	Local operators are the real trouble makers here! I really do believe the council takes a favourable views towards them. If only the council knew and hurtful and cunning these local operators are, then you would support the drivers.

5. Vehicles

5.1 Age of Vehicle

A. Driver	If a vehicle is over 5 years old then maybe but a lot of us are driving round in new or nearly new cars and two tests a year is not fair on us.
B. Driver	Private hire vehicle should be private not put sign like hacks now a days you can't tell difference between private and hackney.
C. Driver	Vehicle age shouldn't be a problem as cars are not cheap putting age limit on the car means making lots of drivers job less as it's not easy to get credit as self employed so taxi drivers needs to invest in the car and at latest run the car 15 years to make return the investment and plus drivers are very keen when they find car is giving problem after 7 to 10 years they change you don't policy for this as repairs are not cheap so drivers just get rid of the car and get new question how many old cars you see on the system not a lot that is a proof
D. Operator	AGE OF VEHICLE..clarification needed on maximum age for a new vehicle purchase for an exempt chauffeur service.
E. Operator	3.7 Renewal will only be given to vehicles less than 9 years old (longer for low/ultra low emission vehicles). This drive towards environmentally friendly technologies is premature, damaging to the financial viability of businesses and based on insufficient/incomplete research and evidence. There will not be sufficient charging points for electric vehicles for many years to come, taxi and PH vehicles cannot be sitting idle whilst charging - this is not financially viable. Operators are likely to choose hybrid vehicles and use fuel - the weight of the batteries will mean higher fuel costs and emissions. Current fleet vehicles may be in pristine condition and business cases have been on them being in service for far longer than 9 years - having to withdraw them and purchase newer vehicles may not be an option for many operators. They may go out of business. A well maintained vehicle, whatever its age, as long as it can pass the COC, which in itself is a quality standard of SCDC, is preferable to purchasing a new low emission vehicle. Far better to maintain current vehicles to a high standard than to invest in new technology for which the lifetime infrastructure (charging points) and eventual disposal (batteries) have not yet been worked out.
F. Driver	Section 3.7 refers to vehicle age rules and i am very concerned that under part A, there is not an implementation notice period for the application of the 9 year old rule on petrol/diesel vehicles i.e. if the policy is adopted on say 28th Feb 2020, without an implementation notice period, a driver could be forced to change his vehicle within a matter of 1-7 days (or similarly short in practical period) as suddenly it will be deemed too old to be re-licensed. i am not against the 9 year rule itself but think it is grossly unfair on drivers with older vehicles who could suddenly be faced with this possibility 'overnight'. This would be both a grossly unfair economic penalty for a individual driver which could cause serious hardship and the driver would be further punished by unexpected loss of earnings caused by the impossibility of buying a new vehicle and getting it tested and licensed in a day or two - this process will always take 7-14 days minimum and even this assumes a sensible turn around by SCDC licensing staff. I believe there needs to be a period of 'grace' before this rule is applied in order that all drivers can become properly aware and i would suggest that this period be 1 year or 6 months (being the new period between testing of vehicles under the new policy). To implement this rule the day after the policy is passed is, as stated very unfair on a driver with a vehicle coming up to its 9 th birthday and not least because the previous policy regarding upper age limit was open ended. am in agreement with a general push towards making the taxi fleet more environmentally friendly. However, there will be a severe issue with the vital provision of wheelchair accessible vehicles on all operators fleets unless WAV vehicles I are excluded from the zero or UL emission

	set date of December 2021 and this is because there are simply no WAV vehicles sensibly available that fit the zero/UL criteria there are currently only 2 on the whole market and 1 is the London style TX1 which obviously cannot be used as a PHV as it is and looks like a hackney carriage. The other is the Nissan ENV200 which is cost prohibitive for nearly all drivers at circa £60k to buy. Wheelchair access jobs are currently being carried out by Peugeot Partner/Horizon style vehicles and this works very well, however there are not immediate plans to provide electric or UL versions of these. Therefore to adopt the policy in its current form is stupid on the basis that wheelchair bound customers will be severely disadvantaged
G. Driver	As it says change your vehicle if its 9 years old. How can i afford to buy new vehicle. I living hand to mouth and these rules just making my life more difficult.
H. Driver	I think it to late your trying to change the policy now after giving out lincence. Cars should be 5 years old. Your a joke now!!!!
I. Driver	I feel that with cars being built to better standards that cars should be able to be no older than 5 years for new license and 10 years for renewels as oppose the the 4 and 9 years proposed.
J. Driver	Taxi age. I believe we should relax the age of the first registration of a vehicle up to 6 years. Reason being 1. Price, we are all self employed drivers, cars are expensive imagine being forced to spend 15k plus to go to work. 2. The age a car has to come off road should be 10 years. 3. Most importantly we should be looking at the condition of the cars.
K. Driver	Not happy with all policy
L. Driver	Is we are are leaving European Union taxi job in Cambridge especially people from European countries has been less and less income is gradually going down so so this proposal about 9 years old vehicle cannot be used as a taxi is the very costly move on drivers buy South cambs District council
M. Driver	I strongly disagree with reducing the vehicle age to 4 years instead of the 5 years it used to be for petrol and diesel cars and 9 years renewal window. There are a lot of cars that are more than 4 years and less than 5 years but have very low mileage and in very good condition. My car was registered in 2015, I bought it last year March with a mileage of 5000 and is still in perfect condition.
N. Driver	I would like to take this opportunity and object to few point of upcoming changes you would like to introduce. First of all age of vehicles not to exceed 9 years. There's no reason for you to change the age and I'm strongly against this change. This would affect how many more years I can drive my vehicle. I have a BMW 7 series. And I'm still paying finance on the car. This will greatly affect me personally, having to buy a new car again in few years. I would like to stick with previous 10 years for a vehicle. Thank you.
O. Driver	6 Months COC. There is again no reason to do MOT/COC every 6 months. This would cost every single driver another £7085 per year as well as inability to plan any other work which will cost driver anotemher unpaid day off, another cost and compliance to think of. Vehicle condition is checked yearly. MOT is a yearly test. There are poeople out there like for example area managers for shop chains, etc.. who are driving similar miles per year, are those required to do 2 MOT's? No. So why we should? I understand the reason behind to have road worthy vehicles out there. But they already are. We take pride of looking after our cars. And if if a condition of a single vehicle is not up to standard, this should be reported by clients to the Operators.
P. Driver	Already changing vehicle age from 5 year to to under 4 years. Makes it very expensive adding at least extra £2000 on price of the car. You cant expect drivers who cars coming upto 9 years at short notice buy a new cars. You need at least £12000 buy suitable car. Uber taken a lot of the student business we already struggling. Radio fee £130 week Fuel £100 - £120 weekly cost fuel so high town driving poor mpg. Insurance. 50 week

	<p>Car finance. 60-100 week Or renting Repairs etc Badge and plate. £25 week At least minimum £375 week expense Average daily talkings £100 - £120 x 5 = £600 -375 £225 week wage 40 hours week earning less then minimum wage. Taxi the are Long waits and no job customer cancelled. We have to work 7 days week to make a living. Yes some driver make more if the company looks after them but majority Don't have school runs or fix regular work.</p>
Q. Business	Vehicle age must be 9 or less. Old vehicles are unsafe and polluting.
R. Driver	<p>Vehicle Age We think its not fair to introduce age limit and Zero or Ultra-Low Emission the trade is very slow and vehicles cost a lot and as self employed loans on the new cars are hard so the age limit should be scrapped and keep 2 MOT a year and as long car is fit to drive stays Zero or Ultra-Low Emission. This Age limit will put 347 vehicles out of the business in just year 2020</p>
S. Driver	I beleive the 9 year rule for vehicle age is unfair to be brought into force staright away. This would cause alot of drivers problems. I think the best way would be to set a date for this for examoke no cars will be re licenced if there 9 years or older after May 2022. This would be a fairer way in my opinion
T. Operator	<p>I am writing in response to the 'Hackney Carriage and Private Hire Licensing Policy Consultation 2019'. Firstly, I would like to address the proposal to reduce the age of existing taxis operating within South Cambridgeshire. I believe that this decision is based on emissions, with the intention of the county ultimately committing to a zero carbon pledge by 2050. This is something that I wholeheartedly support and am instrumental to achieve for my business. However, being a relatively new company that has recently been affected by extensive mechanical costs in the form of new engine and clutch replacement for two of my four vehicles, I would like to express my concerns regarding the new policy that has been proposed. While two of my vehicles are older than the requirements of the new guidelines, I would like to emphasise that these vehicles have been meticulously maintained to very high standards, both mechanically and cosmetically. Although I fully understand the environmental impact that older vehicles may have on the environment, I am also a believer that to repair, conserve, and make use of items that are fit for purpose should also be viewed as a form of environmental friendliness. In the unfortunate event that I am forced to remove these two cars from taxi service will result in the unemployment of two drivers, as financially I am unable to replace the vehicles for newer or low emission versions at this present time due to the recent costs that have incurred regarding the pre-mentioned maintenance issues. When I fulfilled the repairs, I was unaware that the intended policy would be implemented immediately and therefore feel quite insecure in my position as both an operator and a driver and am seriously concerned about the profitability of this industry.</p>
U. Driver	The Council should review the age of the cars - in my opinion cars should be no more than 5 years old. A taxi easily makes about 30,000 miles per year and after 5 years is not safe or reliable to carry passengers.
V. Drivers	<p>Vehicle Age We think its not fair to introduce age limit and Zero or Ultra-Low Emission the trade is very slow and vehicles cost a lot and as self employed loans on the new cars are hard so the age limit should be scrapped and keep 2 MOT a year and as long car is fit to drive stays Zero or Ultra-Low Emission. This Age limit will put 347 vehicles out of the business in just year 2020</p>
W. Driver	<p>NEED TO GIVE SOME RELAXATION A new vehicle licence will not be granted in respect of a vehicle unless it is less than 4 years old. NOT AGREE• A vehicle licence will not be renewed for a petrol or diesel vehicle unless the vehicle is less than 9 years old and complies with at least the Euro 5 emission standards limiting CO, NOX and particle matter emissions. NOT AGREE• A vehicle licence will not be renewed for an Ultralow emissions vehicle unless the vehicle is less than 12 years old. CAN BE IMPLIMENT • A vehicle licence will not be renewed for a zero emissions vehicle unless the vehicle is less than</p>

	15 years old.
X. Driver	To whom this may concern, this new proposal sounds very expensive!. To have to replace your vehicle after 9years because if u buy a taxi which is 4 years old u can only have it for 5 years in that time u may need to have spent a lot of money services it and fixing it when owning the taxi ie gear box clutch engine suspension etc will be like a new vehicle then you will have to replace when buying a vehicle 4 years old or under you might have problems with it if u kept the existing car to u know what has been changed. It seems ridiculous that I need to spend more money on a newer taxi when I have one that is immaculate and has been well maintained.-the taxi I have well maintained kept in good condition you would need to get rid of it and you take the chance on a new or second hand one which you don't know how well it has been maintained or how long it will last also having cctv sounds another expense buying + installing it the thing is there can normally more taxi than customers + with Uber being in Cambrigde it making the trade impossible to earn a good wage considering how much expensive there are just try to understand what I have said please make the right decision thank you
Y. Driver	CCTV will protect public and driver.
Z. Driver	<p>TOPIC – IMPLEMENTATION OF VEHICLE AGE OF 9 YEARS</p> <p>I honestly believe this rule of a vehicle being older than 9 years to be implemented straight away is UTTER CRAZINESS due to its unfairness. I'll explain why I think it's unfair. As of today I can re licence my vehicle which is 10 years old for another whole year but as soon as your policy is implemented another driver whose car is say 9 and half years old will be refused..... how can that be fair???</p> <p>Moreover what would his options be at that point, not everyone can just go and buy a newer vehicle. In my opinion it would be fairer for a date in the future to be set like by Feb 2021 no vehicle over 9 years old will be re licenced, so that drivers have time to buy another vehicle. This surely has to be the right thing to do.... PLEASE PLEASE PLEASE consider this.</p>
AA. Driver	I am very concerned about the 9 year upper age rule for Diesel/petrol PHV's coming in as immediately as this policy is passed. This gives no notice to some drivers who will be expecting to be able to renew in late Feb/March/April of this year and will cause considerable hardship to them and may even cause them to have to leave the trade. I am not against a 9 year rule - just think it should be applied after some notice is afforded to drivers/proprietors subsequent to the policy being passed - somewhere between 1 and 2 years after adoption of policy would seem sensible although it could also be a consideration to align it with Dec 21 date for electric/low emission as this could in fact encourage/speed up the taking on of these vehicles as drivers will be allowed to keep current vehicles until then rather than changing them to another petrol/diesel shortly in order to 'buy' extra years before Dec 21. Surely 4 year rule for new Ultra Low/Electric vehicles should be abandoned now. The only reason given that this was ever in place was 'environmental' and this this is now an argument with these vehicles. If SCDC are serious about encouraging uptake of the these vehicles as soon as possible then this rule must surely and obviously be dropped – not for petrol/diesels, but just the ULEV's and electric ones.
BB. Operator	We are pleased you have moved the formerly proposed 7 year upper age limit for diesels/petrol's out to 9 years. However, we are extremely concerned that applying this as soon/or soon after the policy is adopted is grossly unfair on those drivers whose vehicles are currently 9 year or more or are about to be as this will mean that they instantly have to source and buy a new vehicle - this could cause severe financial hardship and could even lead to some having to leave the trade - either way, it must be unfair to implement without notice and we therefore think a notice period before implementation is vital and practical and reasonable. We would suggest at least a 6 month period (keeping in line with expected new testing regime) but preferably a year more. A further, arguably even better suggestion would be to bring the implementation of the 9 year rule into line with the December 21 rule/move to ULEV/Electric vehicles as we believe there will be quite a few drivers with current vehicles that they will then keep until then/post then because they have been given decent notice and will then buy a ULEV/Electric as opposed to being forced into changing their vehicles prior to then in which case they will almost definitely buy another petrol/diesel and keep renewing it well beyond the Dec 21 date - in other words, we believe that delaying implementation of

	the nine year rule and putting it in line with the ULEV/Electric rule will actually encourage and accelerate the move to the cleaner vehicles and this is the stated aim of SCDC.
5.2 Wheelchair Accessible Vehicles	
A. Resident	Dear sir/madam - I am related to a wheelchair bound person from time to time relies on Panther Taxis to convey him to appointment/visits to aid his quality of life. i am therefore disturbed to hear that your proposed SCDC taxi policy will lead to many less wheelchair taxis being available in the future. I believe this is because there are no wheelchair adapted electric/hybrid options for the drivers to buy and that the only one available is very very expensive. Can councillors please look at this part of the new policy with a view to exempting wheelchair vehicles for the time being. I believe the City council have done this, probably not least because one of the main councillors is wheelchair bound.
B. Driver	Think wheelchair access (WAV) vehicles should be excluded from proposed timeline for ULEV/Electric implementation as there are no signs of a sensible/cost effective Electric WAV vehicle coming to market or on market currently – there is a real danger that SCDC operators will not be able to provide a WAV service and this cant be right. In future, rules could be brought in, but not until the technology/infrastructure and most of all, the market place move on - and no one knows how long this will take.
C. Operator	Wheelchair bound customers will likely have no service: As the main provider of a comprehensive and inclusive Wheelchair access service we are obliged to suggest that unless WAV vehicles are exempted from the intended Dec 21 move to being Electric that there will quite quickly cease to be a wheelchair service available to customers and this is a grave concern and cannot be the aim of SCDC. This will be the case because simply, there are no suitable electric/Ulev WAV vehicles on the market at the moment except two. One of these (the London TX1) cannot be used a private hire vehicle and the other (Nissan ENV200) is circa £60k to buy and is cost prohibitive for the usual economics of a driver in this (and most other) areas; additionally the Nissan is so new there is not yet a second hand market. It is not yet known when/if more practical and cost effective WAV vehicles will be coming to market and also whether the infrastructure to charge then will be available and until they do - and are tested and second hand markets are created - there will be deterioration in the wheelchair service we can provide UNLESS petrol/diesel versions are exempted for the foreseeable - the exemption could be revisited in the future when more is known. Obviously we know the current makeup of our WAV fleet and it is conceivable that our wheelchair service will cease quite quickly if current and future WANS arent exempted and this could be an Equalities Act issue for both Operators and SCDC. Elsewhere in your own policy doc you (SCDC) encourage the provision of a WAV service - the current proposals contradict this.
5.3 Private Hire Plate Exemption	
A. Drivers	How chauffeur cars are exempt from sign so what happen to the public safety I this matter it's like they get special treatment.
B. Operator	The policy, again, does not make clear or differentiate the requirements for The Exempt, Chauffeur Style service, this all refers to taxis. So much confusion, where do we stand. For instance..the strap on the top of your policy site states "All New Drivers to undertake "Safeguarding " by Jan 2020..your draft policy docs states ALL drivers, new and renewal!! So which is it? And does it include Exempt chauffeur services.
C. Operator	3.19 exemption. Why is there a requirement fo PH contracts to be signed 10 days in advance? Why 10 days - is this an arbitrary figure or is there some rationale behind it? PH is of course always advance booking already. Is this point designed as protectionism for local taxi

	<p>firms? Is this legal? Customers should have the right to choose which company they use for any of their journeys, not just executive travel. Many of our "executive" customers tell us that they prefer to use our company for all their journeys (personal as well as business) as they know we only use top quality vehicles and provide a premium service. Many also say they much prefer to travel in an unmarked (exempt) vehicle. The policy is restricting operators from building their business and will disadvantage customers in many rural communities who do not have a wide variety of transport options, as perhaps city dwellers do. Under the new policy, If a new customer attempted to book an airport transfer for a personal(rather than business) trip tomorrow (for example), the operator (with exemption on vehicle) would have to decline as there is no contract in place, the booking may not be "prestige" in nature and the customer is not "regular". However, by declining, the operator would be turning down valuable business which may have developed into a regular pattern, affecting business viability. The customer would also be disadvantaged as there may well not be any other local operators/transport options in the rural area.</p>
D. Driver	<p>Private Hire vehicle exemptions Why exemption for chauffeur and contract Private Hire Vehicle when normal Private Hire Vehicle have to use signage all over the car .</p>
E. Driver	<p>I an an executive chauffeur who is plate exempt. On 11th July last year submitted a FOI request to ascertain of all the complaints received over the last 3 years how many were against hackney carriage and regular private hire and how many were against plate exempt executive chauffeurs. I was looking to get this information to prove, or other wise, the type of work we do means we deal with a very different clientele and would not have same issues as say hackney carriage drivers. Understandably with your the current system you were unable to provide this information as I was told all complaints come in the same way. Going forward I would like to suggest that plate exempt drivers have a plate number for example starting PE so as to differentiate when a complaint come in between us and drivers that are not plate exempt, this would also help to distinguish the difference I believe between the roles and assist everyone.</p>
F. Drivers	<p>We welcome the broad scope of the Exemption privilege but we would question why the figure of 10 days has been included? 3.19 Private Hire Vehicle Notice of Exemption a) This Licensing Authority recognises that there is a specialist market for the use of unmarked hire and reward vehicles in the following circumstances: <input type="checkbox"/> Chauffeur / prestige-type services <input type="checkbox"/> Fulfilling a pre-existing, written contract (pre-existing meaning signed at least 10 working days in advance of the hire) <input type="checkbox"/> Providing a regular service (whether to an individual or to a business) Modern business contracts are often done electronically and sometimes can start very quickly. We feel the purpose of this statement is to exclude immediate 'street hires' (which we support) but would suggest this is reduced to 4 hours. This would enable companies or individuals to engage services quickly but also prevent exempt cars acting as general taxis. Finally we would reiterate our objection to the blanket policy regarding CCTV, thought and consideration should be given to the needs of all types of vehicles and while we can understand the investigative benefits in the processing of complaints we would suggest that the likelihood of dispute is considerably less in an exempt car and should be balanced against the rights of privacy for our passengers. This has been reinforced by the dozens of objections received from our collective customers and forwarded to you. Vehicle licences could be endorsed as for exempt use only, this would prevent a minicab operator from engaging the vehicle for street hires. Ideally this would be</p>

	backed up with an online register.
G. Operator	<p>3.18 Speciality Vehicles and Limousines</p> <p>a) Limousine and speciality vehicles are generally used for special occasions such as anniversaries, stag and hen parties, prom nights, etc. and may be specialist, or stretched vehicles.</p> <p>b) Limousine and speciality vehicles used for the purpose of hire and reward are required to be licensed as Private Hire vehicles, with a seating capacity for 8 passengers or fewer, and all bookings must be made via a licensed operator. So, the above I am right in thinking that I can do this type of work for my customers Yes? Also the 3) below what it actually means please</p> <p>e) Proprietors of prestige type vehicles licensed as Private Hire vehicles or Private Hire vehicles used in special circumstances may seek the permission of this Licensing Authority to waive the conditions of their licence relating to the display of licence plates and door signage Ref to e) above What this means above please ? Because to me it is saying that Panther and other Taxi companies in Cambridge can ask you the Council to waiver a car of its door signs to do a particular Executive job ? Am I right in thinking this ??? yes or no and yes how come</p> <p>Because if e) above is yes then how on earth can you let a plated taxi car become Exempt to do Executive work without a ICO registration and yet Excmpt Executive drivers has to abide by 3.19 below</p> <p>3.19 Private Hire Vehicle Notice of Exemption</p> <p>a) This Licensing Authority recognises that there is a specialist market for the use of unmarked hire and reward vehicles in the following circumstances: • Chauffeur / prestige-type services Fulfilling a pre-existing, written contract (pre-existing meaning signed at least 10 working days in advance of the hire) Providing a regular service (whether to an individual or to a business)</p> <p>i) A certificate of exemption and internal vehicle notice will also be issued by this Authority and must displayed in a prominent place, visible to all passengers.</p> <p>j) Vehicles which have been issued with an exemption certificate will solely undertake executive chauffeur work</p> <p>k) Exempted vehicles found to be carrying out standard private hire work will be subject to enforcement action and the exemption certificate may be revoked.</p> <p>l) Exempted vehicles must not display any advertisements, signage, logos, or insignias advertising the operating company inside or outside the vehicle.</p> <p>m) Operators and proprietors who wish to apply for an exemption certificate must complete the application form, pay the required fee and provide sufficient supporting documentation to establish that the vehicle will be solely used for executive bookings.</p> <p>n) There are extra conditions applicable to exempted vehicles, in addition to the standard conditions. Where there is any inconsistency between the standard conditions and these extra conditions, then these extra conditions must prevail. The extra conditions can be found in Appendix E.</p> <p>o) If an exemption certificate has been issued but the vehicle will no longer be utilised solely for executive type bookings, the exemption plate and certificate must be surrendered and returned to this Licensing Authority. If the vehicle is still licensed, it must then display the plate and door stickers as required by the conditions for private hire vehicles. There will be a fee for the replacement plate and door stickers.</p> <p>p) The types of work that will not be considered for the grant of an exemption include but is not limited to: -</p> <ul style="list-style-type: none"> • Council 'school contract' work; • Journeys to airports, seaports or railway stations, unless part of a journey covered by an exemption

	<ul style="list-style-type: none"> • Theatre journeys or sporting events unless stipulated on the exemption • ‘Hen’ and ‘Stag’ nights. q) Each application for exempt status will be considered on its own merits and there is no right of appeal against a decision by the Local Authority to refuse to grant under s75(3) Local Government (Miscellaneous provisions Act) and the only direct means of challenge would be judicial review. Full details of the process for <p>So how or who makes the decision to decide which work comes under what ? Surly the paying passenges has this choice by booking what they require and for who they value as VIP or Executive and NOT the S.Camb to tell the paying passengers what the council will dictate them to do or who to book</p> <p>There is a market outside the taxi world that people want and that is the 3rd Option an Executive Driver.</p> <p>Also the above work, My work consists of many airport travel work ! And as I said before and will repeat again Most of my work is repeated business from certain companies. From time to time people ring or email me because they want a Executive Driver with Airport and motorway experience which they don’t have the confidence with Taxi Companies so they seek those that do !</p> <p>Not a Hackney which is 1 Option Not a Taxi Company which is the 2nd Option but a 3rd Option and that’s Executive Drivers which is why I said at the beginning of my letter that have not really recognised</p> <p>Lots of my work is also through word and mouth which is fantastic so if people do its is because they want to pay extra for the best and want more that a Hackney Option 1 or Private Hire Taxi Option 2</p> <p>Last year I was asked to send you a letter to describe the work I do and proof of my earnings which I did and I have even printed out my calendar to show how much work I cover ! Last year you also asked me to contact my customers to send you an emails to confirm I drive for them and what my driving meant for them which I also did ! Also last year I was asked to register with ICO for the data protection requirements to safeguard my passengers information which I did ? What is the point of me doing all the above like ICO forms and the above if you’re letting Bigger Taxi Companies give data information to drivers who don’t have and don’t pay for ICO You say that being an Uber driver you cannot work for another taxi company AND YET if you’re a Private Hire Taxi Drivers working for a Taxi company such as Panther you can apply for an Operating License to do individual work ?!?! You’re not making sense! To me if you’re working for a Taxi company such as Panther then you should not be applying for a operating license and doing both ! To me that’s no different from working for Uber and Panther at the same time</p> <p>Even people these days are asking people to remove Alexa’s from there homes when people visit them because don’t feel they are in private !</p>
H. Drivers	<p>Exemptions (Proposals 3.17-3.20)</p> <p>The LPHCA maintains concern on the application and administration of the exemptions for private hire vehicles. In substantiating this position, the LPHCA offers the below comments:</p> <p>(a) The proposals appear to create, at Proposals 3.19(a) and 3.19(j), a conflict with statute by imposing a “sole use” restriction which could limit use of a private hire vehicle under the superseding 24-hour contract exemption (pursuant to <i>section 75(1)(d) Local Government (Miscellaneous Provisions) Act 1976</i>).</p> <p>(b) The proposals do not broadly appear to have considered general CMA guidance on licensing conditions which “...may restrict or distort competition, potentially resulting in...higher fares or...lower quality of service...” (as recommended in ‘<i>Guidance on the Impact of Taxi & Private Hire Licensing on Competition & Consumer Welfare</i>’, CMA, June 2017).</p> <p>c) The proposals do not appear to have considered specific CMA concern on licence conditions which, as at Proposal 3.19(a), over-regulate on the minimum number of days for advance bookings (as found at “<i>Examples of Conditions That May Harm The Interest of Passengers</i>’, <i>Regulation of Taxis & Private Hire Vehicles</i>):</p>

	<p><i>Understanding the Impact on Competition</i>, CMA, April 2017).</p> <p>(d) The proposals do not appear to have been subject to a Competition Impact Assessment (as recommended in <i>'Regulation of Taxis & Private Hire Vehicles: Understanding the Impact on Competition'</i>, CMA, April 2017).</p> <p>(e) The proposals reference, and place reliance upon, the <i>'Hackney Carriage & Private Hire Handbook'</i> which is a policy document not open to public consultation, scrutiny or challenge (as found, for example, at Proposals 3.18(q) and 3.20(d)).</p> <p>We accept the attribution of such exemptions, with the exception of <i>section 75(1)(d) Local Government (Miscellaneous Provisions) Act 1976</i>, is a discretionary matter for licensing authorities (pursuant to <i>section 75(3) Local Government (Miscellaneous Provisions) Act 1976</i>). We, accordingly, recommend additional clarification be given on the administration of these exemptions and seek further stakeholder discussions, prior to any ratification, with SCDC on this matter.</p>
5.4 MOT/ Certificate of Compliance (COC)	
A. Driver	There is no need to do 6 monthly testing just another money spinning regime from the council you will kill the level of service far to much buraucy and red tape, we only just make it pay at the moment
B. Driver	A certificate of compliance every 6 months is too much and just means more time off the road and more expense.
C. Driver	Also with the additional testing means more payout.
D. Driver	also I object to two tests per year.
E. Operator	I am totally against the Mot compliance be twice a year, that cost double and the time that the car will be at the service shop, if you are requiring new cars and we already have a very new fleet in Cambridge, I dont see any reason to do that
F. Driver	I am against the idea of testing the vehicle twice a year as i already spend substantial time and money on car servicing and maintenance throughout the year.
G. Operator	Regarding; Vehicle Testing – Certificate of Compliance <ul style="list-style-type: none"> All vehicles will be required to be tested twice a year. 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. For part time taxi drivers I think it is unnecessary and costly to test the vehicle twice a year. A certificate of compliance once a year should be enough.
H. Operator	Testing every 6 months is too excessive. Means more outlay for the driver as usual
I. Driver	Not happy with all policy
J. Operator	6 monthly tests cost more money
K. Driver	also so to have to MOT test year ear it is not fair especially for pre-booked taxis. The Certificate of Compliance: I strongly oppose the proposal of testing taxi vehicles twice in a year to obtain this certificate, one of the reasons being cost and time wasted at the garage. Since taxi vehicles, considering the mileage accumulated in a year, do general servicing twice in a year. I expect these services to keep the vehicle in good running condition and thereby fit for business and all other things like internal stickers, fire extinguisher and 1st Aid box are already in place and always in the car, so I don't really see any need doing the test twice in a year.
	Testing for Certificate of Compliance twice in a year is putting additional stress on drivers that are already calculating how to get new tyres,

	save for the next service, pay monthly for the car and insurance and also provide for the family. There are unforeseen contingencies to take into consideration, so saving for these is sensible. Creating more expenses for drivers is putting more pressure on them and their performances
L. Driver	With regards to the new South Cambridgeshire policies over the twice a year service and Mot and taxi plates to be change twice a year I, I would like to bring whom ever it may be concern 's attention to the this decision , which I am hopeful they reverse As it I found it hard to make the end meet. As you might have notice Uber cars have take lots of jobs away from us, Service the car twice a year and pay for licensing twice a year make a earning harder to cover all expenses. I wonder if you would like to take that into consideration, that my car pass every year with the very little need to be done and I don't see why I have to pay twice to council when I know it is pointless practice My question Is if we need to service car twice a year why do have to pay for licence again if the car has passed , why not only charge, if the car had not passed Second MOT
M. Driver	In terms of mot test twice a year wouldn't as in Hackney and private hires cars already less than ten years old and well looked after.
N. Driver	I like that council is thinking about age and condition of cars. But I don't think that doing MOT and Certificate of Complacency twice a year is good option. It will increase costs of running business and waste a lot of time. I do like take care of my car, I can not imagine driving faulty or even dirty car.
O. Driver	Regarding 2 vehicle check ups- once a year is enough for already licensed vehicles as you already set up an age limit. If you think it should be 2, then you or the company should pay for the second check-up. Every single procesdure you introduce costs to taxi driver while you making money out of it.
P. Driver	Now 2 mot year south Cambs don't care about drivers keep on issuing licence trying make more money.
Q. Driver	The two test a year again is bringing more and more cost to us the
R. Driver	I think it is unnecessary to have a certificate of compliance test twice a year. The taxi vehicles are very young cars and there should be no reason why they would need additional tests. I already have an MOT test annually and my car is serviced every 16000 miles. This additional test would only add extra cost and time to running my taxi for no obvious benefits. I keep my car in good condition for my client and my own safety.
S. Driver	Vehicle Testing – Certificate of Compliance STRONGLY DISAGREE, IT WILL ADDITIONAL BURDEN TO DRIVERS AND ADDITION FEE FOR COMPLICES ALREADY VERY DIFFICULT MAKING ANYTHING • All vehicles will be required to be tested twice a year. 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.
T. Operator	In addition, I would like to comment on the further proposal of MOT testing to be increased to biannually. While I understand your concerns regarding safety, I think it is important for your department to understand the financial implications of this requirement for small businesses and also the loss of earnings for drivers, particularly since your other policy changes already involve significant financial commitments for drivers and operators.
U. Resident	2 mot is a necessary measure to ensure the vehical is fit for driver and passengers. Cabs can do 5 times more mileage than average person.
V. Driver	COC check 2 times a year is a very bad idea. Every PHD I know keeps the car in the top fit all the times. If introduced it will make another day off and more unnecessary cost.
W. Driver	About two mot it's too much for private hire coz we are not independent driver like Hackney carriage we control by local operator company who do not allow us to work with another operative company at same time and number of taxi has increased in recent year and we getting less job also expense increasing which difficult to cope with situation.

5.5 Dashcam	
A. Driver	CCTV dash cams are quite common these shouldn't be mandatory by the council as it should licensed vehicle owner's choice to install or not
B. Driver	Dashcams NOT AGREE AT ALL, IT SHOULD BE DRIVER CHOICE• Any dashcams installed in a licensed vehicle must be outward facing only. NOT AGREE AT ALL, IT SHOULD BE DRIVER CHOICE• Internal facing dashcams will not be permitted in the licensed vehicles.
C. Driver	I don't support that dash camera should be control by council but I'm not against the dash camera, you can say every driver must have it in their car by law but strictly private control not third party.
5.6 Door Signage/ Licence Plate	
A. Driver	Private hire signage. 1. The council issued signage is very confusing for customers that notice them (if they are noticed) I personally have been asked numerous time's if I work for two companies. 2. The signage is very confusing with camcabs sign writing being yellow. 3. These signs damage our cars. 4. They look hideous, I firmly believe with these signs on or off it does not make a private hire car any safer. Many members of the public do not know where to start how to complain to the council. The council if enforcing the signage should put a complaints number directly to the council. 5. Operator door signs 5.1 I agree every car to have operator door signs, it's important to have the customer identify the company and car easily. Also if needed to complain the number is on the operator door sign so complaints can be sorted straight away.
B. Driver	I have asked many of my customers about the new signs. Nobody even noticed this. Those who wanted to complain was called to Panther without any problems. This all new signs policy is completely useless. Another beaurocratic costfull nonsense. Should be scrapped ASAP.
C. Driver	External Signage Door signage is not safe for drivers to change them while between the jobs on busy roads and the argument of customers safety linking those door signage is totally false as there are over 40000 private hire vehicles with no door signage and never been a passenger safety issue. Internal Vehicle Notices Interior signage should be drivers info not the company its again a joke changing every time I switch my work to other operator Operators should pay the cost for internal signage as we think its not fair for us to pay to display there info inside the car . Private Hire vehicle exemptions Why exemption for chauffeur and contract Private Hire Vehicle when normal Private Hire Vehicle have to use signage all over the car .

D. Driver	<p>External Signage</p> <p>Door signage is not safe for drivers to change them while between the jobs on busy roads and the argument of customers safety linking those door signage is totally false as there are over 40000 private hire vehicles with no door signage and never been a passenger safety issue.</p>
E. Resident	Fully support CCTV and any signage for public and drivers safety .This is a basic must in my view. And support any extra measures put forward.
F. Driver	new door signs and internal signage again more cost to us as drivers
G. driver	I can not see the point of having those extra external sings on doors. There is one on a back of the car plus company logo and info pre booked only which clearly states that in case of privet hire vehicles journey can be done only after pre booking with office. Also the internal sign does not make any sense. Passengers can not see what is on it. Frankly no one even notices that in a car.
H. Driver	Yellow stickers on the cars - very poor quality, after a few car washes, they get very uneven , upeal in the corners, anyone can peel them off and the driver should not be held responsible for that. The magnetic ones fly off on the motorway. If you manage to provide a better quality , can you garantee that they will not damage the paint when removed? After all we are using our cars. In London the stickers on the inside the windows which are also their licence.
I. Driver	<p>Door signage:</p> <p>We are not a hailed taxi service and are only pre-booked. We can't just be flagged on the street. In addition, as a licensed South Cambridgeshire District Council Driver, I already have all the information on the back of the car on the plate. It feels like extra bureaucracy and an unnecessary extra charge. I can't see any reason why we need to have extra signage on the car or how it will benefit the public. I understand Hackney Carriage need this but can't see the benefits for Private Hire Taxis.</p> <p>In addition we are not even allowed to remove these plates, not even when we aren't working. Unfortunately Taxi cars are often targeted and damaged by people walking by or plates are stolen from the side of the car. I had a situation once when someone removed the plate from my car but I did not do anything at the time because they were in a group, it was late and they were drunk and I felt vulnerable.</p> <p>I think drivers should at least be able to remove the plates when they are not working.</p>
J. Driver	All doors sign requirements should be scraped. TLC in London is a prime example. No signs and it works.
K. Driver	<p>External Signage</p> <p>Door signage in 21st century it's pointless. In fact we didn't have it and it didn't make any positive difference since we've had it. Customer is still looking for the drivers and car details such us number plate, make model, colour, name, confirming destination. The amount of signage that we have now only make our car look like a Christmas tree. It is also not safe for drivers to change them while between the jobs on busy roads and the argument of customers safety linking those door signage is totally false as there are over 40000 private hire vehicles with no door signage and never been a passenger safety issue.</p>
L. Drivers	<p>External Signage & Livery / Advertisements (Proposals 3.6 / 3.20)</p> <p>The LPHCA maintains its opposition to the over-regulation of licensing authority, and private hire operator, signage, liveries or advertisements on or within private hire vehicles. In substantiating this position, the LPHCA offers the below comments:</p> <p>(a) The proposals fail to broadly establish such licence conditions are “<i>reasonably necessary</i>” (within the meaning</p>

	<p>of section 48(2) Local Government (Miscellaneous Provisions) Act 1976).</p> <p>(b) The proposals fail to broadly account for the right to privacy of potential public personalities, and vulnerable passengers, who may request, or require, a higher level of discretion (within the meaning of <i>Schedule 1, Article 8, Human Rights Act 1998</i>).</p> <p>(c) The proposals do not appear to have considered specific Competition & Markets Authority (“CMA”) concern on licence conditions which, as at Proposal 3.6(l), make it difficult for private hire drivers to work for multiple private hire operators (as found at “<i>Examples of Conditions That May Harm The Interest of Passengers’, Regulation of Taxis & Private Hire Vehicles: Understanding the Impact on Competition</i>”, CMA, April 2017).</p> <p>(d) The proposals do not appear to have considered specific CMA concern on licence conditions which, as at Proposal 3.20[?], prohibit advertisements thereby limiting the ability to compete (as found at “<i>Examples of Conditions That May Harm The Interest of Passengers’, Regulation of Taxis & Private Hire Vehicles: Understanding the Impact on Competition</i>”, CMA, April 2017).</p> <p>(e) The proposals do not broadly appear to have been subject to a Competition Impact Assessment (as recommended in ‘<i>Regulation of Taxis & Private Hire Vehicles: Understanding the Impact on Competition</i>’, CMA, April 2017).</p> <p>(f) The proposals reference, and place reliance upon, the ‘<i>Hackney Carriage & Private Hire Handbook</i>’ which is a policy document not open to public consultation, scrutiny or challenge (as found, for example, at Proposal 3.6(l)).</p> <p>We accept the statutory discretion licensing authorities possess (pursuant to section 48(2) Local Government (Miscellaneous Provisions) Act 1976). We however, recommend additional clarification be given on the prescription or restriction of signage, liveries or advertisements and seek further stakeholder discussions with SCDC, prior to any ratification, on the trade impacts of this matter.</p>
5.7 Internal Vehicle Notice	
A. Operator	INTERNAL VEHICLE NOTICE..NOT NECESSARY as we follow the rules of our Exempt certificate and DO NOT CARRY THE PUBLIC. The passengers in our cars do not make the booking. The booking is made by their company. The company has all information regarding our service. So, if any problem, there has been none in over 20 years, the passenger will contact their office, then the office will take it up with us. And we know exactly who the driver is. The company can then cancel our contract, or take further action if a serious offence occurs. There is no comeback on the council
B. Drivers	Internal Vehicle Notices Interior signage should be drivers info not the company its again a joke changing every time I switch my work to other operator Operators should pay the cost for internal signage as we think its not fair for us to pay to display there info inside the car .
C. Driver	New internal signage I already have a driver badge in the front of my car visible for all passengers to see, with my name and photograph clearly displayed. Putting additional signage on the dash board creates a reflection onto the window which is hazardous whilst driving. It is also completely unnecessary as I already have my photo ID displayed which is clearly visible to passengers. As above all identification is given to the passenger by the operator via text, prior to collection, and it is possible to get all this information at a later date if requested from the

	<p>company.</p> <p>You suggest these changes are for the safety of the public however you seem to completely disregard the vulnerability of the taxi driver. The threats that I face, often on a daily basis from passengers. And unfortunately I don't see you putting any measures in place to protect taxi drivers from racist and abusive passengers. If anything it feels like you are setting me up as a criminal and my car is becoming like an ice-cream van. Do you know how many passengers have run off without paying?</p>
5.8 CCTV	
A. Driver	<p>Just reading through the proposed changes to Taxi Licensing.</p> <p>I totally object to the need for CCTV I guess the costs which I can imagine as being very high would have to be covered by the owner of the vehicle. The proposed changes are totally unnecessary, I have been driving taxis for 23 years and have never had a situation where CCTV would have been of any use. Me and my wife are both winding down in the hours we do and the costs of such an implementation would probably drive us away from the trade we both earn less than the minimum wage.</p>
B. Driver	<p>Can I comment, if the proposed changes go ahead I will be forced to only run one taxi my wife only works part time and the additional costs of fitting cameras which I guess will be around £1000 will force her to stop working.</p>
C. Driver	<p>I would like to object to the proposed changes on taxi licencing. Especially the fitting of cctv as we haven't been given the cost of this equipment and I guess it will be very expensive. I work part-time and if the proposed changes go through I will be forced to hand back the plate. I have just plated the vehicle for 12 months will you be refunding me for not being able to work for a full year if you want cameras fitted by November?</p> <p>Yours sincerely</p>
D. Operator	<p>CCTV..section 78i states that Exempt vehicles SOLELY UNDERTAKE EXECUTIVE CHAUFFEUR WORK ONLY..we work to those rules so CCTV is not necessary as we can not carry the public! And as previously demonstrated our corporate accounts DO NOT WANT CCTV for confidentiality reasons. Why not make it compulsory for taxis but OPTIONAL for the exempt Chauffeur Services?</p> <p>Also, I can not fit CCTV as it will contravene the regulations on my finance agreement ..NOT TO MODIFY THE VEHICLE IN ANY WAY.</p>
E. Operator	<p>Regarding CCTV. The proposed policy of having CCTV in Executive Chauffeur Vehicles with exempt licences is totally unfair especially when I have previously demonstrated with letters from account customers protesting against it. But, as there are operators licensed with other authorities that DO NOT HAVE CCTV as a regulation can come in to Cambridge and "steal" our customers because they can give them the privacy and security they require. So SCDC could promote the demise of the Executive Chauffeur Service in Cambridge, therefore restricting the choice for the corporate sector in the city, at a time that the city wants to and needs to entice more large companies into the area. All those companies are global organisations who need to travel regularly and with a service they demand.</p>
F. Drivers	<p>CCTV</p> <p>WE love to have CCTV installed but there are lot of uncertainty as what will happen when the camera is broken and the company who installed they cant fix the camera same day are drivers allowed to drive ?</p> <p>Who will reimburse the driver loss of earning if the CCTV company unable to repair same day .</p> <p>My Private trips with my family how do I stop from CCTV recording my family .</p>
G. Driver	<p>CTV</p> <p>NOT AGREE AT ALL, IT SHOULD BE DRIVER CHOICE• All Hackney Carriage and Private Hire vehicles must be fitted</p>

	with a Council approved CCTV system at application no later than 31st March 2021
H. Resident	CCTV – If this becomes mandatory and a condition of licence the council will need to be the Data Controller as described by the ICO. If CCTV is optional for all vehicles the council can set a minimum standard for a system that is compliant with the ICO regulations. Implement a minimum standard within the policy so that any systems fitted must meet or exceed the requirements. This would negate the need to have a dashcam fitted and all data collected would be stored securely. In this scenario the vehicle proprietor would be the Data Controller. All those wishing to have a system fitted would need to complete and submit a registration form detailing the system being fitted, the installer, proof of registration with the ICO and any other conditions the council deem necessary. Once implemented, any vehicle with a dashcam fitted would be suspended until such time as it is removed.
I. Operator	CCTV - why does SCDC feel that it needs to have this in all PH vehicles when only 13 out of 2910 authorities require it? Is there statistical evidence to say that PH passengers would feel safer with it fitted? What about similar statistical evidence that passengers in exempt vehicles want it? It is unfair to pass this significant (and undefined) cost on to operators without full evidence of need.
J. Driver	Thirdly I totally disapprove of the fitment of any cctv equipment in the vehicle as this greatly infringes on mine and the customers privacy. I would not like to start work everyday with a camera recording and sure a lot of passengers will feel uncomfortable if they know someone can be watching them.
K. Operator	I would also like to raise my concerns regarding the proposed policy of 'Fitting approved CCTV'. Again, I fully understand the rationale behind this idea. However, I have serious concerns about the affordability of installation, maintenance, and in the event that this technology requiring transferral to another vehicle. The impact of these costs on small businesses has the potential to be detrimental, particularly if the new policies mentioned above also come into effect. I also do not feel that the issues around privacy have been adequately explained in the leaflet. Is the 30-minute delay activated each time the ignition is started? If this is the case, I see a huge privacy issue for drivers and their families who have selected a vehicle to meet both personal and business needs. In the event that drivers and their families are being filmed for the first 30 minutes of each journey they make, I see difficulties arising with breast feeding, removal of cultural/religious dress, and dignity for elderly relatives. I also have a number of other questions. If installation of this equipment causes problems to existing electrics, who will be responsible? If my car were to be stolen, who is being held responsible for this sensitive data? Will this installation be classified as a modification for insurance purposes? This will almost certainly increase the premium. Will lease companies allow drivers to install this technology in their vehicles? Since ordinarily they are not permitted to add any electrical devices, which could possibly result in breach of contract and the driver left financially responsible.
L. Driver	CCTV. 1. I have been a ph driver for four years now, not once have I felt at risk or have my customers. 2. If the council doubt some drivers and would like us to have cctv they should not have licensed those drivers. 3. The cost should be covered/reduced by the council if you are an existing plated car holder. New cars should have to pay.
M. Driver	Not happy with all policy
N. Operator	Why only external camera? What about protection for the driver with violent customers? Are council approved CCTV providers going to be checked by drivers aswell. I can get a good CCTV for under £40. How much is the council's CCTV providers going to be??? CCTV will cost more money and won't completely protect the driver.
O. Driver	However I understand the emission has to be kept low, and safety of the customers as well as myself as a driver is important so cctv is great idea
P. Driver	But to keep reading about all these new items like cctv. I'm very much against the introduction of CCTV my car is my personal car and my

	work vehicle as well. I feel having CCTV running around the clock when I'm using the car on my own personal journey is wrong I feel if there was an incident involving me the police would have free evidence to look through where Joe public will not have to abide by this. Yes it could work in my favour but also against me. I don't willingly break the law when I drive my car but the fact I'll be under the microscope 24/7 I truly do not agree with. I'm in favour of Scdc getting tougher on new drivers this in my opinion should of been done years ago. But the fact you at Scdc feel it's right to keep making us have to fork out for all these new things is not fair. It will have to stop at some point. But to expect me to go and pay £500-£600 for cctv is unfair.
Q. Drivers	I am highly concerned about the welfare of my underaged children. As licenced vehicles are not only used for business they get used privately I would feel threatened that images and footage of my children will be recorded and stored without my permission or say. Also the fact that it can be requested by the public makes that matter worse. It is the highest level of violation of a human beings privacy.
R. Driver	It involves extra costs which drivers don't get reimbursed.
S. Driver	CCTV. Your polucy says that only council appriced CCTVs are allowed. Why is that? Why not simply set a guideline of what it should be like? I mean technical requirements. As you would either earn money on drivers doing your own system and only allowing that or favouriting specific brand model, installer. I want freedon of choice and price when it comes to this. What if I want a descltreet system? I drive 7 series for Executive company and would like to choose what would he fitted to my car myself.
T. Business	CCTV must be mandatory to ensure public and drivers are protected
U. Resident	Fully support CCTV and any signage for public and drivers safety.This is a basic must in my view.And support any extra measures put forward.
V. Driver	My only concern is about approved by council CCTV. What does it mean and why council has to approved this system. If I'll be able to provide footage from the system what difference does it mean if I'll choose one. I think that the price of this is the biggest worry and who will install this. As I've checked what kind of CCTV system has to be fitted I'm worried that it will damage internal parts of my car.
W. Driver	Introducing CCTV in the vehicles- how it is justified - how many criminal offences committed by taxi drivers are unsolved by the police . and if it is compulsory the council has to provide the equipment, the drivers are unable to pay £1200. We pay expensive taxi insurance avarage of £2,000 per year, £ 135.00 per week for the Taxi company providing the jobs, equivalent to £5,500.00 per year.. council registartion fees are rising every year. Council is giving permission to new drivers , there are not enough jobs to be able to cover our expenses. Drirers are forced to work 15- 20 hours, and it is not safe for anyone - drivers, passengers, pedestrians. Our charges in some cases are cheaper then a public transport. We are working unsocial hours for less than the minimum wage.
X. Operator	as a private hire taxi driver I do not wish to have any CCTV in my car I don't know from where you get that stupid ideas but probably some of you got IQ below 20!! In India you wouldn't get paid for that what are you doing in here! How even dare you to thought that you can put CCTV into our PRIVATE cars! do you understand that word --> PRIVATE! it means we use our cars not only to work but for many other purposes like shopping, holidays with family etc etc and we do not wish to be recorded! can't wait to see your stupid faces when we take you into the court for interrupting our privacy! Just read a little bit about Protection of Freedoms Act and about Human Rights. Every year you are changing your rules and its worst and more complicated then it was before... when you loose half of your registered taxi drivers you will start scrubing your head like monkey and wonder what we have done wrong? it will be too late! They will never come back, bunch of you have no idea how to improve any service... if you like spying other people I suggest to mount mini camera in your toilet and transmit that into all countries you will also earn couple pounds from viewers... good idea?? Not bad at all you haven't got any better so far.... I do understand you get many complaints every week and most of them are silly... I will give you one free advice that what you should do when you get another phone call with complaint. First of all you need to ask for nationality of that person who's calling I can bet in 99,9% all cases they are british this nation is born to complain everywhere and on everything day without

	moaning is wasted!!!! second advice also for free! if they are not happy from one taxi company please tell them to use different one and problem will solve itself... still not happy? they can use public transport! not god enough? they can start jogging
Y. Operator	CCTV ! Again, many of my passengers have mixed feelings about this and so do I, and many prefer not be filmed and recorded so we have a greed if they choose to use the camera as a coat hanger then I am not going to stop them and run the risk of my passengers whom I have been driving for may years ! I drive for them in PRIVATE unless my passengers request different.
Z. Driver	Now outwards facing cameras where is the protection for driver non. Camera cost will be Outrageous and drivers will have no privacy we do have long wait for jobs.
AA. Business	I'm an approved installer for Safesystems CCTV Ltd and have installed many systems for taxi drivers across the southeast. Many drivers have reported that these systems act as a great deterrent and it helps give them peace of mind. We've already had a number of cases where these CCTV systems have been very useful in road rage incidents and attacks on drivers. Having these cctv systems installed in all taxis and private hire vehicles will have a measurable impact on attacks towards drivers.
BB. Driver	CCTV the way it's being proposed is very expensive, if the council would subsidised the cost, then maybe it will be a good idea, plus it drivers will support it, I think if the council contribute towards the cost, in the long run the council would save loads of money, i.e no need to enforcement meetings etc for allegations etc.
CC. Driver	CCTV I don't like having CCTV installed in my vehicle there are lot of uncertainty as what will happen when the camera is broken and the company who installed they cant fix the camera same day are drivers allowed to drive ? Who will reimburse the driver loss of earning if the CCTV company unable to repair same day . My Private trips with my family how do I stop from CCTV recording my family . In fact if you want me to have one in my car I should probably have one in my house as well. Never met a customer or driver who will be happy to be recorded while travelling with business associates or family. It is discrimination to have us install CCTV when none of the other transport services like air transport, trains and so on has to do it.
DD. Drivers	CCTV (Proposal 3.10) The LPHCA maintains its opposition to CCTV being a <i>mandatory</i> requirement for private hire vehicles. In substantiating this position, the LPHCA offers the below comments: (a) The proposals fail to broadly establish it is " <i>reasonably necessary</i> " (within the meaning of <i>section 48(2) Local Government (Miscellaneous Provisions) Act 1976</i>). (b) The proposals exceed, at Proposal 3.10(c) the Department for Transport ("DfT") advice to merely "...look sympathetically on...or...encourage..." (at para. 35, <i>Taxi & Private Hire Vehicle Licensing: Best Practice Guidance, DfT, 2010</i>). (c) The proposals do not broadly appear to have been considered by the Information Commissioners Office ("ICO") (and / or Surveillance Camera Commissioner ("SCC")) (pursuant to, amongst others, <i>Southampton City Council v The Information Commissioner EA/2012/0171</i>). (d) The proposals do not broadly appear to have been subject to a Data Protection Impact Assessment (pursuant to <i>section 64 Data Protection Act 2018</i> and ' <i>Blog: Continuous CCTV in Taxis – Where Do Councils Stand?</i> ', ICO, August 2018). (e) The proposals, in light of the above, do not broadly appear to take account of legislative and regulatory

requirements (pursuant to the *General Data Protection Regulation EU 2016/679*, *Data Protection Act 2018*, *Protection of Freedoms Act 2012*, *Human Rights Act 1998*, *'Surveillance Camera Code of Practice'*, Home Office, 2013 and *'In the Picture: A Data Protection Code of Practice for Surveillance Cameras & Personal Information'*, ICO, 2017).

(f) The proposals do not broadly appear to have considered CMA guidance on licensing conditions which "...*...may restrict or distort competition, potentially resulting in...higher fares or...lower quality of service...*" (as recommended in *'Guidance on the Impact of Taxi & Private Hire Licensing on Competition & Consumer Welfare'*, CMA, June 2017).

(g) The proposals do not broadly appear to have been subject to a Competition Impact Assessment ("CIA") (as recommended in *'Regulation of Taxis & Private Hire Vehicles: Understanding the Impact on Competition'*, CMA, April 2017).

(h) The proposals seek to address an unresolved issue for national legislative or regulatory reform (previous conflicting recommendations have been made by the *Task & Finish Group on Taxi & Private Hire Vehicle Licensing* in 2018 and the *Law Commission* in 2014. Richard Fuller MP also notably introduced, without success, the *Hackney Carriages & Private Hire Vehicles (Closed Circuit Television) Bill* in 2013).

(i) The proposals reference, and place reliance upon, the *'Hackney Carriage & Private Hire Handbook'* which is a policy document not open to public consultation, scrutiny or challenge (as found, for example, at Proposal 3.10(c)).

The incorporation of a CCTV licence condition remains, in the absence of Parliamentary or Governmental reforms, a difficult and controversial matter. We would, accordingly, urge caution before SCDC strictly mandates this requirement and, in the alternative, submit the use of CCTV should be a subjective decision for each private hire vehicle owner or driver.

6. Enforcement

A. Resident	See more basic checks and enforcement action
B. Driver	Get more enforcement in Cambridge city please because private hire taking hackney jobs
C. Driver	It's good to keep the taxi standard high and need enforcement but some drivers Are penalised for just minor things and some occasions drivers are wrongly dismissed so the appeal system need to stay
D. Driver	Again their are drivers getting cautions with out investigation of the allegations and put on their record and used against the driver in later in hearings and knowing that it was alleged complaint
E. Driver	Not happy with all policy
F. Driver	Unfortunately not enough enforcement is done. More is needed.
G. Resident	Please do note enforcement.
H. Business	Regular enforcement is needed to ensure cabs are compliant. Hope to see more action
I. Resident	Working proactively with City is a must for public safety due to the amount of plying for hire by private hires
J. Driver	What I feel you should be doing is going out down the train station and other private hire hotspots looking at the drivers and their vehicles you have drivers not abiding by the signage rules. I've sent dozens of photographs regarding this to you guys.
K. Operator	<p>There appears to be some confliction between these two paragraphs,</p> <p>Appendix B, 11a states:</p> <p>11.Motoring convictions</p> <p>a) Hackney carriage and private hire drivers are professional drivers charged with the responsibility of carrying the public. Any motoring conviction demonstrates a lack of professionalism and will be considered seriously. It is accepted that offences can be committed unintentionally, and a single occurrence of a minor traffic offence would not prohibit the grant of a licence or may not result in action against an existing licence. Subsequent convictions MAY reinforce the fact that the licensee does not take their professional responsibilities seriously and is therefore MAY not BE a safe and suitable person to be granted or retain a licence.</p> <p>Section 13 goes on to state:</p> <p>13.Other motoring offences</p> <p>b) A minor traffic or vehicle related offence is one which does not involve loss of life, driving under the influence of drink or drugs, driving whilst using a mobile phone, and has not resulted in injury to any person or damage to any property (including vehicles). Where an applicant has 7 or more points on their DVLA licence for minor traffic or similar offences, a licence will not be granted until at least 5 years have elapsed since the completion of any sentence imposed.</p> <p>c) A major traffic or vehicle related offence is one which is not covered above and also any offence which resulted in injury to any person or damage to any property (including vehicles). It also includes driving without insurance or any offence connected with motor insurance. Where an applicant has a conviction for a major traffic offence or similar offence, a licence MAY not be granted until at least 7 years have elapsed since the completion of any sentence imposed.</p> <p>These two paragraphs seem to be at odds with each other, the first seems to imply that any driver with more than one minor traffic offenses in an unspecified time period will lose their livelihood, the second implies that two offences (6 points) would be acceptable but</p>

	<p>that more than 7 would result in the loss of the drivers licence.</p> <p>Whilst we agree that professional drivers need to be held to a high standard, we feel that these paragraphs even when clarified are too absolute and that in particular existing licence holders should be assessed individually to determine the circumstances. Often there can be extenuating circumstances and revocation of licences would cause unwarranted hardship. This policy could seriously reduce the number of licenced drivers available to operators which in turn endangers public safety by encouraging unlicensed touting and out of area drivers with lower standards. Please could you consider changing the wording to may instead of will as indicated in red?</p> <p>Another small issue we have noted appears on Appendix I (Page 114)</p> <p>a. The driver shall not allow any lone person, or more than one person, to be conveyed in the front of any licensed vehicle unless agreed with the operator at the time of booking.</p> <p>Customers often ask to sit in the front seat, particularly on long journeys as they feel more comfortable and may get travel sick in the rear. We provide private hire vehicles and our customers have hired the whole vehicle and driver for the duration of the journey. They should be entitled to choose whichever licenced seat they wish.</p>
L. Driver	Subside the cost of CCTV, less work for the enforcement team.
M. Vehicle owner	<p>Proper and effective enforcement of the door sign rules would be appreciated. There should also be a move back to Operator's having to keep ORIGINAL licence DOCS as this will help regulate the issues caused by drivers working for more than 1 company and this multiple issues this causes - not least that SCDC as regulators don't know who they work with operator wise - this must be a major safeguarding issue.</p>

7. Relevance of Convictions

A. Resident	The lowest offence should be ok if turning a new leaf. The middling to top crimes are refused especially those offences committed involving children.
B. Driver	Get strong punishment for private hire who ply illegal hire
C. Driver	Not happy with all policy
D. Driver	Scrap the points system.

8. Any other Comments

A. Driver	<p>General comment. It's very clear that southcamb's vehicle's work along side city council vehicle's. It should be made that they are very similar to view. Southcamb's cars look very silly with council signage next to a city plated car. All of these suggested changes seem to be "what if problems" if there are any problems in the southcamb's vehicle's do you think that signage/cctv/age of the Vehicle's will help? Please explain how all of those will help. As the only one that I believe will help is cctv. Also it seems to me all of these changes have come to light ever since southcamb's agreed to license Uber. Uber is not fit and proper. They are private hire cars plying for hire through and app. Which being private hire you are not allowed to ply for hire. Many thanks one of you're licensed drivers.</p>
B. Driver	<p>Vehicles with only conference seating should be licensed. This is the case in Cambridge. Pull up seats are a trap and really uncomfortable.</p>
C. Resident	<p>I was unfortunate enough to be in an accident with one of your licensed vehicles. The Multi-seater had row of seats and only access to rear seats was to pull forward middle seat. This is a trap which I found out. PLEASE license ONLY CONFERENCE SEATING vehicles. Many thanks.</p>
D. Driver	<p>Hi just want ask if it is legal. I see lots people driving Wolverhampton licenced cars in Cambridge But there is lot cars from Witlessford operating in Cambridge. And there is no markings on cars at all. Is it legal to set up company in Cambridge and one in Witlessford. Take bookings in Cambridge and operate with Witlessford licenced cars no plates show as am not sure they have not exempt plating. Thanks for your time</p>
E. Driver	<p>You make the life of drive more complicated please don't do this new policy. These drivers are not rich, and you have to look after him. Now there is more driver and the job no like before, now is less, So maybe many people will live this job .</p>
F. Driver	<p>All above changes will help investor who gives car on rent, as difficult for new or poorer driver to buy any car, it will force driver to get on rent either from or somewhere else, richer get more richer for example Cambcab used wolverhampton council taxi which have very low required for taxi licensing. 2ndly council and police why not stopping 20-50 Extinction Rebellion for blocking roads and private properties twice a week. Is that teaching taxi driver and other block the road and make pressure. If yes, we can do, every day.</p>
G. Driver	<p>I hope I'm far from the only one who disagrees with changes to the policy and you listen to peoples opinions this time. There have been loads of changes in just last 2 years. Starting from stickers in and out of car, yellow council signs, strictnes of positioning of those, green lines on silver cars, etc etc etc.. Please calm your horses down and dont make us clowns. Yes, we look like clowns on the streets. London has a green sticker on front and back of the car. Small, discreet sticker. We on the other hand are like a Christmas tree, with all the licences. Why we can't think of beautiful 1 sticker at the front and 1 at the back of the car, if you like yellow rhat much, make it yellow, but not 25 stickers in out, side, rear, another side, rear doors, froont doors.. Simply ridiculous. Please don't take my opinion as offence. That's not my point. But please rather listen and most importantly understand what I'm trying to say. I'm just saying that this is not only my opinion. Others think the same. Also, every little thing you have added to the vehicles since last 2-3 years cost drivers extra money and fills your accounts. A bit suspicious, feels like you are thinking how to monetise Hackney/Private Hire drivers. Again, just an opinion in our democratic system. Feel free if you want to contact me on my email, I will be able to reply to any questions you might have. I understand that I might have been shortsighted due to certain circumstances, but please just try to understand how majority of drivers think. Thank you for your time reading this.</p>

	Sincerely yours,
H. Driver	Every year there are new rules and procedures, fares, rules that put by either council or the taxi companies - costs to the driver . Companies decrease the rates, and increase the radio fees that hits the drivers. You put new fees and procedures that hits the drivers The number of licences you issue are increasing whilst competition is increasing while all of your procedures are costing to drivers. STOP introducing procedures to make money to yourself. It is not about public safety or wellbeing, it looks like you are benefiting from drivers through these changes. As the name shows, this is a private company, not public business. If you care about public safety, then you should meet all the extra costs, not put the burden on the taxi drivers. If you require extra tests or check ups, then you handle the fees.
I. Business	May I suggest SCDC not to license small multiseater that require folding seats. I understand Cambridge only permits conference seating. May I also suggest SCDC policies to be in line with Cambridge or hogher
J. Resident	Insurance certificates – Currently when a new or renewal vehicle application is received it is checked to ensure that it correctly covers private hire pre-booked work or public hire for hackney carriages. However, some drivers believe that if they have another named person on the policy and certificate and it covers social, domestic and pleasure, then that person can drive the vehicle. This is not the case as the legislation clearly states that any person driving a licensed private hire or hackney carriage vehicle must hold the requisite licence issued by the local authority. Therefore, any unlicensed person driving the vehicle is committing an offence for which they may be prosecuted. Likewise, the proprietor allowing this to happen is also committing an offence and is also liable to be prosecuted. I would therefore propose that all insurance documents with named drivers are checked against the database and any that are shown as not being licensed the renewal/grant of a vehicle licence is refused until such time as a new insurance certificate is submitted with only SCDC licensed driver's named on it. For any mid-term vehicle checks where the issue arises, the vehicle should be suspended until such time that a new correct certificate is submitted. To confirm that once licensed, a private hire vehicle is always a private hire whether working or not, see Benson -v- Boyce.
K. Driver	I wasn't consulted on the previous version of consultation and would have thought a summary of changes should have been posted to all involved instead of a letter telling to go to a webpage and read over 400 pages to find changes you are playing with our livelihoods, and you won't be happy until you have put us out of business.
L. Driver	Stop private hire and hackney carriage taxi who flooding the Cambridge city area.
M. Driver	Not happy at all
N. Operator	As a driver and operator I feel as though these new rules are a type of tax for the driver. All of these rules are going to cost more money.
O. Driver	We have no union protect drivers from operator poor condition. Honestly better of working at Tesco part time and staying at home rest of the time. If you don't work in the trade you will not understand no sick pay no holiday pay and we earn even less then minimum wage. Would be very grateful if you consider my points. All the above is true and reasonable honestly have consider new trade because taxi getting to hard and becoming a charity. If you don't work 80 hours week you can't survive in taxi. 40 hours you could make enough Many years ago now you can't even survive.
P. Driver	We need taxi forum and meeting with drivers and the taxi licensing authorities and listen to the drivers complains against the operators because drivers at the moment have no one to listen to them if operators are unfair with the driver
Q. Driver	And finally are you aware already working in the district we have taxis plated in Wolverhampton working and competing against us and with all the Uber cars you are plating we are already struggling financially
R. Operator	one thing I really don't understand is South Cambridgeshire is being so strictly, but nobody talk about a regulated Fare scheme, I got a flyer once an operator charging to go to Heathrow £70, there is a war here in Cambridge putting the prices very low and this hurts the hole business, in London the council there is not that strictly and the Fares are much higher than here, is something you have to think, or be

	honest and say that you guys wants to reduce the number of cars and operators, in this case is very simple, just limited the number of cars and operator in the City, too many rules will reduce a lot of good business and service for Cambridge.
S. Driver	Also please change your policy on multiseater. Folding seats are a trap. Conference seating like Cambridges requirement are much better, safer and accessible.
T. Driver	Please treat us fairly. Thank you.
U. Driver	I think that you should represent people and their will and what's morally accepted in the society, otherwise you're forcing us to share our personal space and privacy via our way of making living.
V. Drivers	<p>In addition to the above comments, and if not already done so, I would politely ask the LPHCA correspondence to SCDC of 26th November 2019 and 4th January 2020 be entered alongside this response. The latter being a request for extension to the consultation period based on SCDC failures to comply with the Cabinet Office '<i>Consultation Principles 2018</i>'.</p> <p>We wholly appreciate the very difficult balance local authorities must strike between duties to prevent crime or disorder and promote economic, social and environmental well-being of its area. The LPHCA supports these endeavours and is likewise committed to the overriding consideration of ensuring public safety.</p> <p>I wish to, once again, sincerely thank SCDC for its helpful assistance throughout both consultations and welcome continued dialogue in the future.</p>