

2. Would like the council/officers to also look at/consider the modern rationale for continuing to ask which operator a driver is attached too – and asking Ops to sign application papers in normal times as – these days - drivers are more likely to be with more than 1 operator and there seems to be NO onus on them to inform council when they are with more than 1, and/or when they move operator – we believe, not least for safeguarding reasons, it should be incumbent on a driver to inform the authority you of such changes and would ideally like it to be a license condition. If it is to be that it is not incumbent on drivers to inform in this (or similar) way, then surely there is no point in asking the question in the first place.

3. For us, the sooner a suitable course is found, and drivers can start to get through it, the better. Without being critical SCDC were a little slow previously in getting this set up so not as many current drivers have been through at this point as we would like. Being able to go to our customers (schools; boarding schools; NHS; language schools; county council; social service etc) and confirm/verify that drivers have had some training is becoming ever more commercially vital to us.

7. CCTV: we knew we would not be able to stop this populist clause coming in at SCDC when it did but were always of the mind - for many reasons - that this should be down to driver choice. Additionally, we knew from prior experience at Cambridge City, that, despite extensive research and time spent, finding a properly and suitably specified camera that really did do everything needed for all parties was a massive a near insurmountable task – and certainly not one that could be achieved within a sensible budget for the average driver, it being pointless having one at all if it didn't do everything required practically and lawfully regulation wise. Thus, an affordable camera's main use might be only as a deterrent, and this clearly needs to be driver choice.

With new Statutory guidelines in place we agree, a further onus for proportionality assessment exists and this has certainly not been done in the past, mainly due to it not being a requirement!

Add in the pandemic factor and how economically challenged drivers currently are, the last thing they need is the cost involved in this obligation, so again, at very least, timelines for any implementation need pushing back, and when the other factors are added in, this whole part of the policy needs revision before deciding on any implementation.

8. Regarding 3.12 COC's: we are very happy with the proposal to remain at 12 monthly tests plus MOT with some officer discretion where appropriate. SCDC policy of having a range of accredited garages works well and, in our experience, standards have been and remain appropriately high. Despite having a testing garage ourselves at Panther that would have benefitted from 6 monthly tests, we never in favour of moving to this because of the extra burden on drivers etc. and admin staff at operator HQ's. Also, implementing was always going to be a significant extra burden on officers/staff at SCDC.....all unnecessary when current/12 monthly system is good.....classic case of 'if it isn't broken, don't try and fix'!!

3.19 Exempt vehicles: we have no particular view on this either way due to not being in the 'exec market' but would advise that exempt vehicles without plates sometimes have issues getting on the whitelist for bus lanes and the Cambridge city centre access area depending on the mood/current interpretations/current rules of the county council with regard to this – might be worth checking things out with them before making this change.

3.27 Age limits & Environmental Considerations:

- Of all the proposed changes outlined this is the one, in our opinion and experience, that is the most vital (for drivers, and by association, their operators) to be implemented as proposed in order to avert major post-pandemic difficulties for the trade, and more pertinently to avoid a significant deterioration in service levels to the taxi using public. Here are the variety of reasons why:
- Records at Panther and individual driver feedback, shows that drivers have spent much of the last 18 months enduring gross takings of between 25 and 50% of their normal pre-pandemic levels, these being the levels on which many based their business plans regarding vehicle purchase/purchase methods etc. back in 2019 or prior.
- Even now, as lockdown is eased a 'good day' at Panther (in terms of overall job numbers/bookings) still only represents 65% of what we had pre-pandemic; it is clear that the recovery in Cambridgeshire is much slower than in other parts of the country. We have colleagues in the industry running taxi companies in the likes of Milton Keynes, Sheffield, Nottingham, Portsmouth and Newcastle, and their recovery has been much quicker than ours – some are back to pre-pandemic levels and one operator is actually short of drivers and trying to recruit – this is a very different outlook to the one we face in Cambs and where Cambs has often been immune to economic difficulties in the past, this time the 'boot is on the other foot'. Here is a snapshot of why:
- There is a very high number of people still working from home in the Cambs area and this is likely to continue to be the case for the foreseeable going forward.....this is down to the nature of 'industry' in Cambridge and we know several large employers whose staff have been told that there is no end date to them working from home.
- The traditional things that support the taxi trade in Cambs have all been severely adversely affected: business travel; tourism; university closure/partial closure/restricted activity; language school business decimated; night economy decimated.
- SEISS payments on their own have proved not to be enough and drivers have still had to keep up payments of fixed business costs such as insurance; car finance; vehicle maintenance; licensing; fuel; vehicle excise; DBS costs. Most of these costs have suffered inflationary pressures, especially fuel. There has been no respite in the licensing regime for them and many have not been able to access grant help via the ARG funding at SCDC due to the SCDC stance on payments to taxi drivers from their LRDHS fund.
- Many drivers have been forced to take payment holidays from their vehicle finance agreements which severely delayed their individual business plans including any planning they were doing towards acceding to the SCDC policy for vehicles as effective from Dec 21st this year – this date has become a major worry for many of them in terms of being able to viably stay in the trade when it comes to their next change of vehicle.
- Resultantly, many drivers no longer currently have a good enough credit record to help them facilitate the move towards electric & ULEV's this soon.
- Panther have already lost 70-80 drivers as a direct result of the conditions brought about by the pandemic. Drivers are settling into employed jobs that pay less than taxi driving traditionally did but guarantee an income and have much less of the uncertainty and worry incumbent on being a sole trader. Many more drivers are considering their future and 'treading water' whilst working out how this is all going to play out for them – many of them are stressed and are seeking help and advice from us on an almost daily basis. Of major concern to them is the now prohibitive cost involved and infrastructure issues surrounding, the implementation of eth vehicle age limits and electric/ULEV requirements coming into

force from December. We see this in the form of them coming to us with ever increasing regularity and in numbers not seen before, to see if we can rent then a licensed vehicle from us to work in as opposed to them trying to own one themselves. We have been able to help drivers in the past by either renting them their first vehicle or two when they initially come to the trade or even by financing vehicles for them as we have a Consumer Credit Licence. Unfortunately, in the current conditions we are pretty much unable to help on this front; this is due to two main factors: firstly, we are not in as strong a position ourselves due to the catastrophic effect the pandemic has had on us as an Operator and secondly, the cost of electric & ULEV vehicles is still so high (with no viable second-hand market yet) that it means to buy them and rent them is no more viable than the driver buying them, as the cost of them means we would have to set rental cost to the driver accordingly and unsustainably high.

- Here are some ballpark but accurate figures regarding how things work for drivers based on our extensive experience as an Operator:
- For viability, most drivers spend between £10k and £15k on a relabel vehicle to undertake their licensed work in. They run these cars over a number of years until they are virtually worthless whilst obviously keeping them well maintained and within the standards required by COC's & MOTs. They then repeat the cycle. The most successful taxi drivers are those that follow this simple but effective routine; these make up the majority of successful taxi drivers on our fleet and are the ones that make taxi driving a career choice and consequently gain the experience that places them well to provide a consistently high service to the public. These are the drivers who, on a daily basis, service our schools and social services obligations; move our vulnerable adults to and from day centres and take infirm people to the doctors/to collect prescriptions and on essential shopping trips. They are the same batch of drivers who service our medical centres and in particular, the hospital where their work contact work conveying patients in lieu of hospital transport is vital; they also provide daily transport for dialysis patients for the ambulance service. These are the bank of drivers that the current conditions and prospective rules are hurting most and are in most danger of being lost to us all unless the changes proposed by SCDC officers to push the implementation dates back are adopted. In addition to this there are very major infrastructure and other economic reasons that make the implementation of the rules as they stand impractical and unviable. In no particular order they are as follows:
- Major and severe lack of charging points in the area. Cambridge & Cambs is light years behind many cities/areas with its provision for charging points. This isn't to 'point the finger' just to state fact. Milton Keynes for example has twice the Cambridge population but over 10 times as many publicly accessible charging points. In Cambridge there are a handful of taxi only points but in South Cambs – to the best of my knowledge, a very small handful, not all of which are particularly publicly accessible (such as the West Anglia one at the college in Milton) and half of which are fast chargers as opposed to rapid chargers. The 'main' 2 are at Cambridge Servies on the A14 and in Cambourne, with one either up and running or soon to be in Eddington, compliments the University. There is NOTHING south of Cambridge city. I appreciate there are plans in the pipeline but I am also ware from attending SCDC taxi trade meetings that the authority has been turned down for points in multiple places. This state of affairs is nowhere near advanced enough to facilitate the imminent change in taxi policy' let alone future Govt intentions.
- Even with the advent of home charging an RAC survey provides that over 30% of vehicle owners do not have access to a driveway or personal garage and rely on parking in the streets when their vehicle is not in use – that's circa 9million vehicles in the UK and common

sense therefore dictates that obviously the local taxi trade will have a commensurate number of vehicles that fall into this category too.

- There are still no really practical or viable electric vehicles that have the mileage on one charge that a taxi driver requires to undertake a properly full shift or to consider long-distance work. This situation is improving all the time and the market is evolving – but not quicker than the pace of desire for change and some of the timeframes that have been set out within. There are still no viable 5–8-seater options or wheelchair access options.
- **Crucially**, there is not yet a viable/vibrant/competitive second-hand market for all electric or ULEV vehicles – it was reasonable to think there would be when the current policy was adopted but the pandemic has severely put the brakes on that - excuse the pun – as people have not changed their cars and many of the few qualifying vehicles that can be found are in the £19 - £25K price bracket – too expensive for ordinary taxi drivers in normal times, let alone these times.
- Of 130 electric vehicle models on the market in the UK only 13 (so exactly 10%) are likely to reach most licensing authorities' conditions to be suitable to be a taxi – and of these, all but 4 are well over £30K new and those 4 are over £25K new – figures from an article in a taxi trade magazine.
- The Govt has recently removed the forecourt subsidy for those buying electric vehicles so they are now more expensive when we most need them to be cheaper!
- Gone too, via a recent change, is the favourable VAT subsidy on the fuel i.e., the electric at charging points - this is now charged at standard rate so has gone up to taxi drivers who, invariably, are not VAT registered.
- All of this combined contributes to a situation that has been concerning Panther management for some time now, as we have watched the market, then the pandemic situation, as the date for implementation of vehicle age changes and environment considerations gets ever nearer and becomes more unachievable. Due mainly to the unprecedented pandemic situation but also the lack of infrastructure progress, we believe the current policy has become a classic case of trying to 'run before we can walk' and we welcome the notion that the dates be put back as prescribed in the officer proposals, indeed we merit the idea as essential for the future success of the taxi industry locally on all levels.
- We would like to stress that we are completely behind the long-term proposals themselves and enthusiastically endorse the end goals of moving to a greener future for all the obvious reasons; indeed, Panther have tried to place themselves at the forefront of this thinking locally in a number of different and verifiable ways. We 'voted' for this in the previous consultation, as did a significant number of our drivers – it seemed viable then, but clearly needs adapting, time-wise, now.
- The only structural change to the current policy that we would ask the council to give consideration to help drivers/the trade recover from all this in due course would be the removal of the 'less than 4 year old' stipulation for a vehicle at the first point of licensing once the electric/Ulev policy 'kicks-in'. The rationale for this rule has historically always been an environmental one but when the environmental consideration policy finally does take effect, this consideration has clearly then become obsolete by default – it will help drivers take-up the Electric/Ulev option quicker, once applicable.

3.27 Appendix Di – proposal to insert/change rules regarding MPV access egress:

Panther disagree with this proposal unless a distinction is made between MPV vehicles and minibuses as categorized on a vehicle V-5. To explain further, the implementation proposed achieves two things that may not be desirable. Firstly, it ultimately means that minibuses with forward facing seats will be eliminated from being able to be licensed – which will have a negative impact on availability to the public via drivers not buying such vehicles (and it should not be underestimated how often we get requests from the public for forward facing multi-seaters). Secondly, it ‘encourages’ drivers to change the way their seats are facing to get them through a taxi test and then creates a seating arrangement that a) hasn’t been safety tested properly and b) means the leg-room between the forward & rear-facing passengers is uncomfortable; intrusive and frankly could become a safeguarding issue.

Vehicles such as the Ford Torneo or Renault Traffic minibuses (with minibus categorized on the log-book) have been extensively crash-tested to VOSA standards for safety including passenger access/egress and are fitted – in almost all cases with a quick-release mechanism on the middle row of passenger seats to facilitate safety in the event of an accident – enabling the removal of the whole seat very quickly and easily. So, we believe that these vehicles should be able to be licensed. MPV vehicles such Ford Galaxy’s and Vauxhall Zafira’s (with MPV categorized on the log-book) built for full capacity use on a more casual/less often basis and are therefore (invariably) tip-up seats/clamber of the corner, that are not easily removable in the event of an accident and should therefore arguably, be subject to licensing policy that restricts numbers of passengers or wont be licensed.

In other words, we agree with this insertion in terms of MPV’s but not minibuses, and would ask that this is thought about in greater detail before implementation. Our Operations Manager, Gavin Witt has done lots of research in this area whilst discussing it with drivers and the officers at Cambridge City Council who we also license with, and he can assist with advice/viewpoints if required.

Point 39. DBS proposals; this reads that drivers will have to seek their own enhanced DBS on-line. With the level of check required they cannot do this ‘off their own back’ and can only do it through a registered body i.e. SCDC in this instance so can we just check that this will still be the case and that you are simply moving the DBS process on-line through yourselves?

Thank you for the chance to respond to these proposals and apologies this text is so extensive!!

Regards,

Paul Clare

General Manager – Panther Taxis Ltd