

Hackney Carriage and Private Hire Policy Review 2020

Consultation Responses

	Consideration (Responses Received)	Options/Proposal/Change
1	<p>I would like to draw your attention towards the new taxi policy for the years 2019-2022 regarding the removal of the safest and the most convenient cars for wheelchair (Peugeot Partner Tepee and Citroen Berlingo).</p> <p>I mean if these cars are built by cab direct or any authorised mobility workshop these are the safest and easiest cars to carry wheelchair. As this is the only car which can carry electric wheelchairs because of having electric winch in them which prevents all sorts of wheelchairs from rolling back at the time of getting the disabled customers on board.</p> <p>If the council reviews the policy and brings these cars back on the hackney carriage list, it will make our disabled customers' life a lot easier and safer in the future as majority of the wheelchair users order these particular cars (Peugeot Partner and Citroen Birlingo) on request at the time of booking only because they don't feel safe and comfortable with other type of hackney carriages.</p> <p>Kind regards Abubakker Farooq</p>	<p>These vehicles have been reviewed and included in the list</p>
2	<p>I'm writing let you know why I do not think you should implement these changes to the hackney and private hire vehicle policy. Euro 6 engined vehicles are not cheap to obtain, to get a euro 6 engined taxi for hackney carriage, you have to spend at least a minimum of £18,000.00 for a hackney purpose built M1 taxi as a euro 6 engined taxi starts in 2016-17. How are we supposed to afford this? After all the expenses e.g</p>	<p>The Euro 6 is a government led change since 1 January 2015. It is for the licensing committee to decide when ESBC should implement the change and</p>

<p>insurance, MOT, fuel, office rental, wear and tear etc etc, it's hard to afford this we are already struggling in this trade we can just about afford the current vehicles allowed which we just bout can afford a few years old used one for our work because of the age restrictions after just few years in use we loose over half of the money we pay it's ridiculous! this is going to make it very difficult for us taxi drivers to stay in a job? Because the way that it is going it won't be long before there will only be drivers who can afford to stick with your policy's . I would seriously think about this change that you are implementing and reconsider as this will effect us massively. As for the CAT D/N and C/S vehicle if they are checked and motd and vosa passed i don't see the problem That's why we have a Taxi MOT every 6 months to check if the vehicle is roadworthy i'm speaking for the poor drivers who do god sent ours to put food on the table and pay for there families as your aware we do not get a fixed or hourly wage we do 80/90 hours to get paid for bout 40/45 hours as we only get paid by calls we do which makes it very difficult for us please try to put yourselves in our shoes thank you. I hope you can reconsider this policy and can come to an alternative arrangement taking this review into consideration.</p> <p>Qamar Nazir</p>	<p>whether grandfather rights will apply or there will be an extension to 2022.</p> <p>Point 5 The important words in the policy are "as having sustained structural damage ". A Category S (similar to previous Cat C) write off is where it has been recorded by DVLA as having sustained structural damage resulting from a road traffic accident rendering it beyond economical repair. Cars written off as a CAT S case , must have a form V23 submitted by the insurer or agent to DVLA as soon as the categorisation decision is made and without waiting for the V5 .There is a danger that some sellers try to pass off Cat S cars as non-damaged motors by hiding their past history. The damage is more than cosmetic and could include a bent or twisted chassis or collapsed crumple zone. Insurers often sell Cat S vehicles for Salvage. Therefore, these vehicles are risky in several ways including safety.</p>
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		<p>(Cat S (Formerly Cat C) – its only affecting Cat S – Structural damage. The Cat N (Formerly Cat D) these vehicles should be non-structural damage, unless have been deemed a write off)</p> <p>The stance of the Council in respect of insurance “write off” vehicles is purely on the grounds of public safety. There are concerns regarding substandard repairs and a question of adequate insurance cover. Both of these concerns should not be compromised for licensed vehicles carrying passengers.</p>
3	<p>Whom it may concern Dear sir/Madam Thank you for giving me the opportunity to give you my views on Hackney and private hire vehicles policy 2019/2022. I would like to request to you to please bring back the Hackney vehicles which have been taken off from the list such as Fiat doblo Peugeot partner tepee etc. I request to you to please look at the age of the vehicles too and extend the age for Hackney vehicles from 10 to 15 years and for private hire vehicles from 7 to 10 years so every couple of years drivers don't have to change their vehicles, To give drivers families a good financial peace of mind so they can concentrate on the best future of their children and contribute in to the community.</p>	<p>These vehicles have been reviewed and included in the list.</p> <p>The age of vehicles do not form part of this policy review and consultation.</p>

	<p>Best Regards Ghulam Murtaza Hackney number 786</p>	
4	<p>Hi I am Burton Taxi driver for 30 yrs the licensing tram all ways making changers taxi badges & taxi fee going up Avery year we can't ford to spend money new taxis u gave us 10 year limits on hackey wheelchair excess vehicle peugeot expert tepee rear wheelchair excess vehicle was on list then off the list i wish to add peugeot expert tepee independence on the list this VEHICLE is affordable for all the taxi driver in burton on trent thank u Mr Mehboob Hussain</p> <p>Mabs Hussain</p>	<p>These vehicles have been reviewed and included in the list</p>
5	<p>Hi there, I'm writing to tell you why I do not think you should implement these changes to the hackney and private hire vehicle policy. Euro 6 engined vehicles are not cheap to obtain, to get a Euro 6 engined taxi for hackney carriage, you have to spend around £20,000.00 for a hackney purpose built M1 taxi as a euro 6 engined taxi starts in 2016-17 which as you know even a normal 16-17 plate vehicle is not cheap. After all the expenses like insurance, MOT, fuel, office rental, wear and tear etc etc, we just about get by and with this new change, it will be impossible to afford. We can just about afford the current vehicles allowed! It is absurd. It seems like you are trying to put taxi drivers out of a job because the way that it is going it won't be long before there will hardly be any taxi drivers on the road. I would seriously think about this change that you are implementing and reconsider as this will effect us massively. CATEGORY D/N and C/S vehicles should be allowed as when vehicles get written off you can just make it mandatory to have another MOT? I don't understand why you are making life so hard for us we have to pay so much in fees as it is. I'm not just speaking for myself I speak</p>	<p>As Number 2</p>

	<p>on behalf of many taxi drivers who have the same opinion as I do and if you do not believe me you can go and ask them directly. They do so many hours to put food on the table and now with these newer EU6 vehicles it will be tough for them to stay as taxi drivers. I hope you do take this into consideration, come to alternative arrangements and put yourselves in our shoes with this policy you plan on enforcing. I also planned to get a hackney carriage vehicle but the moment I heard about the new policy, it instantly swayed me away from the idea.</p> <p>Thank you for taking the time to read my "Review".</p> <p>Regards, Shaan Khan.</p>	
6	<p>Hi the loop hole of operator license is making south derbyshire cars coming picking up and dropping in older vehicles then east staffordshire council and on top of that the biggest base in burton i cars has drivers licensing their car at south derbyshire when the years run out for east staffs. So you are losing license fee. Consider the private hire to be 8 or even 9 years maybe the same as hackney vehicles as the standard of private hire vehicles is better than hackneys who are given 10 years as you will lose more vehicles license money to this loop hole.</p> <p>AmerMahmood Sent from my iPhone</p>	<p>The age of vehicles do not form part of this policy review and consultation.</p>
7	<p>Dear Margaret Woolley,</p> <p>Many thanks for your letter dated 3rdDecember 2019 informing me that East Staffordshire Borough Council wishes to carry out a formal consultation of its Hackney Carriage and Private Hire Policy Review of Vehicle Requirements and that as part of</p>	<p>No changes required.</p>

	<p>this process the council wishes to undertake formal consultation with us before finalising the document.</p> <p>I have reviewed the draft policy and supporting documentation on the East Staffordshire Borough Council website. I wanted to express my happiness and gratitude at the addition of Peugeot Partner Tepee, Fiat Doblo and VW Caddy/Caddy Max within the list of approved purpose built Hackney Carriage Vehicles on pages 77 and 78 of the document. It will be extremely useful for our clients to benefit from these rear loading vehicles as they have expressed appreciation for the ease that these types of vehicles provide. For this reason, I fully support and welcome these proposed changes.</p> <p>I hope you find this information useful in your consultation process and I look forward to reviewing the report on the revised policy.</p> <p>Kindest regards,</p> <p>Mr Mohammad Ajmal</p>	
8	<p>To whom it may concern.</p> <p>I am in favour of your new policy. I agree with the fact that you have brought back the back loader taxi. As it is in high demand. Especially by the citizens in electronic wheelchairs</p> <p>Regards Imtiaz Talib</p>	No changes required

9	<p>Hi Can you please add Peugeot Expert Tepee rear wheel chair excess as well. Thanks ST14 Station Taxis Uttoxitor.</p>	<p>These vehicles have been reviewed and included in the list.</p>
10.	<p>Hi,</p> <p>I have recently bought my vehicle ref: SF65 EWS, and I have come across some changes that I am not happy with. I have spend £15,000 on my vehicle last year, expecting for it to run until 2025 due to my last vehicles age limit coming to an end. However some of the new changes to the policy means that I will have to change my taxi again in order to meet the requirements. This will cause is a massive financial problem for me as I am the only one providing for my family and can't afford to keep changing my vehicle.</p> <p>After reading the policy and noticing some of the changes. Section 19, Emissions is the area I am massively concerned about. Could you please clarify when this shall take effect by and who it shall effect. Will this effect me? The vehicle I have purchased last year was supposed to run up to 2025. I am loosing 3 years if this area has to be met as the now policy will take effect from 2022. I suggest leave the current drivers as they are, until their vehicle age limit expires. This should only take effect to new vehicles being used and not for drivers that are currently already on road.</p> <p>Please could you advise on what is the best way to overcome this issue. I look forward to hearing from you.</p> <p>If you'd like an discussion, please could you contact me on 07533254353 and I shall happily assist in answering any questions/queries.</p> <p>Thanks in advance Shaffaqat Mahmood</p>	<p>The driver has been advised that his vehicle is a Euro 6.</p> <p>The Euro 6 is a government led change since 1 January 2015. It is for the licensing committee to decide when ESBC should implement the change and whether grandfather rights will apply or there will be an extension to 2022.</p>

	<p>Dear Licensing,</p> <p>This email/ Letter is made in reply to the proposed Hackney Carriage and Private Hire Policy Review published 2019 ending January 15th 2020.</p> <p>On Monday 6th January 2020 various members mainly Operators from the Trade held a meeting at Princess Street Community Centre representing the views of their Drivers and how best to return a reply to the Policy changes. It was agreed by all present that we reply by 1 email with the replies to various Items due for change and we raise our views and concerns as follows.</p> <p>Present at the meeting were the following Operators who represented the Drivers from there Firms. Darley Abbey Cars, A1 Ace Taxis, Alpine Taxis & Horninglow Taxis, Premier Cars, I Cars, New Street Taxis, Branston Taxis, Uttoxeter Taxis, Charlie Taxis, Express Cars, 43 Taxis, 5 Ten Taxis, Station Taxis,</p> <p>At the outcome it was decided that the following comments be passed forward which the Trade either want more clarity on or disagree with the change in full, they are listed by number order.</p> <p>2) Whilst the Trade agrees overall that we will have to move to the Emissions change, the Trade feels that in line with our neighbouring authorities we are not prepared for the change and to be allowed up to 2025 for this change to be introduced rather than 2022 which is too soon, furthermore as per previous Trade meeting held with Licencing the Trade want clarification that grand father rights be granted to all existing Hackney Carriages to run until there expiry example being if someone has bought a 2016 cab but does not meet the new law it will be allowed to run till 2026 if not taken off the road by the owner sooner.</p>	<p>Point 2 The Euro 6 is a government led change since 1 January 2015. It is for the licensing committee to decide when ESBC should implement the change and whether grandfather rights will apply or there will be an extension to 2022</p> <p>Other neighbouring Councils have or are about to introduce similar changes regarding emissions/ euro ratings of licensed vehicles by 1/4/2022. e.g. Lichfield DC, Ashfield DC, North West Leicestershire DC, Shropshire Council. Derby CC and Stoke on Trent CC appear to only licence certain HCVs , namely purpose built HCs or conversions by specialist taxi conversion firms. Many LAs have reviewed their policies, particularly following the introduction or pending implementation of Clean Air Zones (CAZ) in cities like London, Birmingham, Nottingham, Leicester, and</p>
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<p>5) The Trade disagrees with this point and feels the council should allow as present any vehicle even one sustaining a total loss subject to the Vosa approved Mot station passing the vehicle as per there high standards as safe to be on the road as is currently the procedure and if there is to be a change proof must be provided by the Council that in allowing these Vehicle into the trade in ESBC it has caused a valid reason for concern.</p> <p>12) At present there is no legal requirement to have CCTV installed into a Licenced vehicle and therefore there is very little chance of a driver presenting or having available any CCTV evidence to present to either authority. Moving forward on the issue of CCTV can the Council look at a grant to get this initiative installed into all Licenced Vehicles</p> <p>14) Ford connect rear loading Hackney be added to the list.</p> <p>The Trade asks the Council to consider all the points as listed and also feels there are some further points the Trade wishes to discuss and a meeting be arranged with the Operators representatives.</p> <p>The Companies below act on behalf of all the listed operators at the top of this letter as per the meeting held by the trade on 6th January 2020. Darley Abbey Cars, A1 Ace Taxis, Alpine Taxis & Horninglow Taxis, Premier Cars, I Cars, New Street Taxis, Branston Taxis, Uttoxeter Taxis, Charlie Taxis, Express Cars, 43 Taxis, 5 Ten Taxis, Station Taxis.</p>	<p>Derby.</p> <p>The rationale for the emission standards to be introduced by 1/4/2022 is all about public protection and compliance of "taxis" with the latest regulations /CAZs etc. This will contribute to the national and ESBC's objective of improving air quality. Poor air quality is a significant public health issue, and older "taxis" tend to be more polluting types of vehicles, as they operate throughout the day and night.</p> <p>The introduction in April 2022 (if agreed) will give a nationally consistent approach and permits taxi drivers to enter a number of possible CAZs without penalty over the next few years. Approx. 100 licensed HCVs (diesel WAVs) with registration plates 09/59, 10/60, 11/61,12/62 will all have been or are due to be replaced in line with the current 10 year age policy on or before 2022. This still gives a further 2 years notice to vehicle proprietors to plan for a suitable replacement vehicle, which fully complies</p>
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		<p>with emission standards.</p> <p>Point 5 The important words in the policy are "as having sustained structural damage ". A Category S (similar to previous Cat C) write off is where it has been recorded by DVLA as having sustained structural damage resulting from a road traffic accident rendering it beyond economical repair. Cars written off as a CAT S case , must have a form V23 submitted by the insurer or agent to DVLA as soon as the categorisation decision is made and without waiting for the V5 .There is a danger that some sellers try to pass off Cat S cars as non-damaged motors by hiding their past history. The damage is more than cosmetic and could include a bent or twisted chassis or collapsed crumple zone. Insurers often sell Cat S vehicles for Salvage. Therefore, these vehicles are risky in several ways including safety. The cars salvage category remains with the vehicle for life,</p>
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		<p>CCTV in use in vehicles . This does not apply to any vehicles who do not have CCTV at present. We are not aware of any funds that are available and therefore a matter for the trade. The recommendation merely regulates use of CCTV / webcams already installed by vehicle proprietors. The Council are aware that there is no legal requirement to have CCTV installed however are advising that if a vehicle has CCTV installed that they follow the points listed in the policy.</p> <p>Point 14 Other vehicles should they meet the vehicle specification can be added to the list.</p> <p>General Meetings are arranged with the trade and Officers are happy to continue to facilitate this. Also drop in sessions could be utilised.</p>