

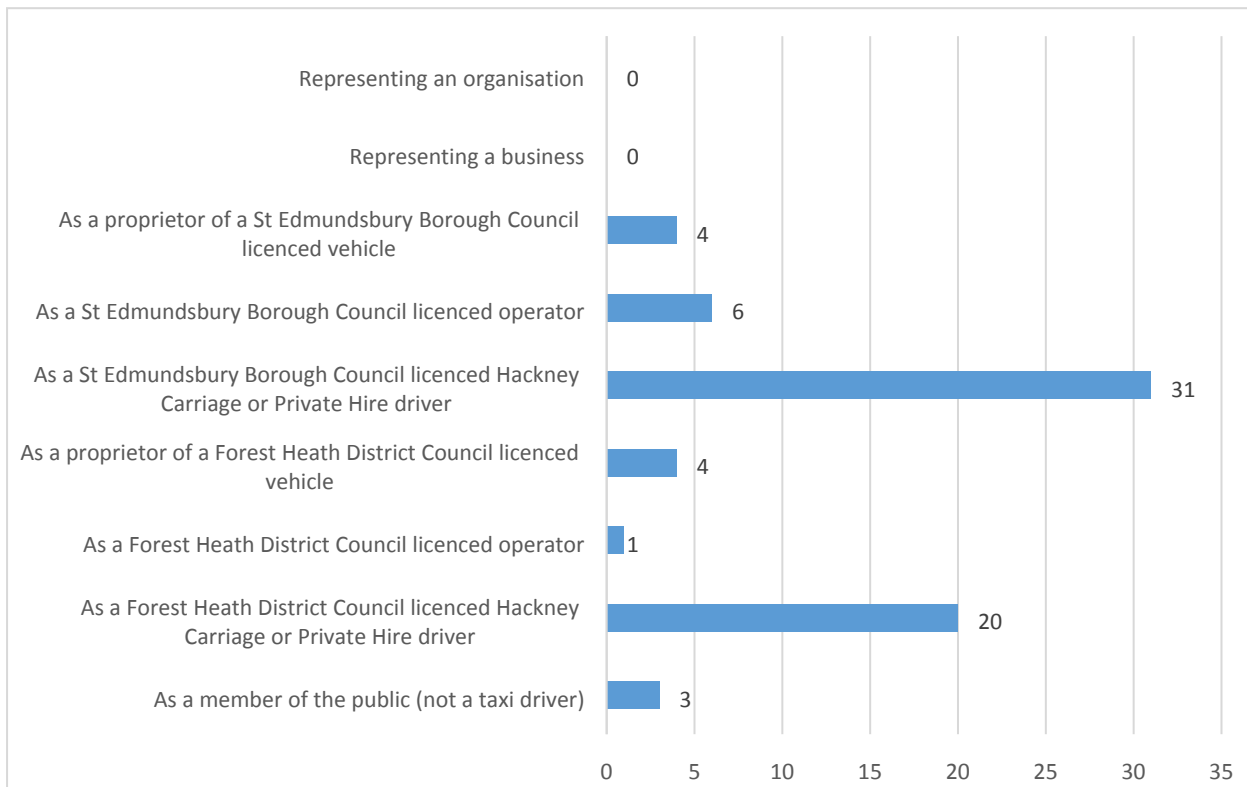
APPENDIX B

Summary of Taxi Policy Harmonisation consultation responses

There were 76 responses to the survey in total, however, three were tests carried out by members of staff and two were left completely blank. The total number of responses analysed is therefore 71.

1. About the respondents

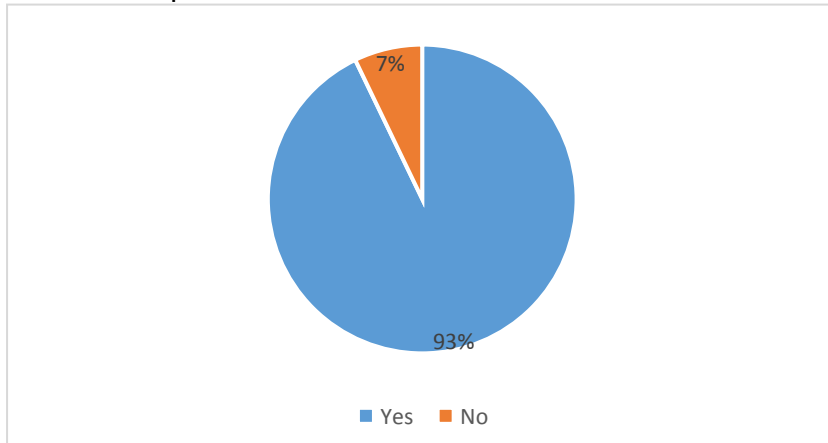
The majority were responding as a St Edmundsbury Borough Council licensed Hackney Carriage or Private Hire Driver (31). There were no responses from those representing an organisation or business.



Other

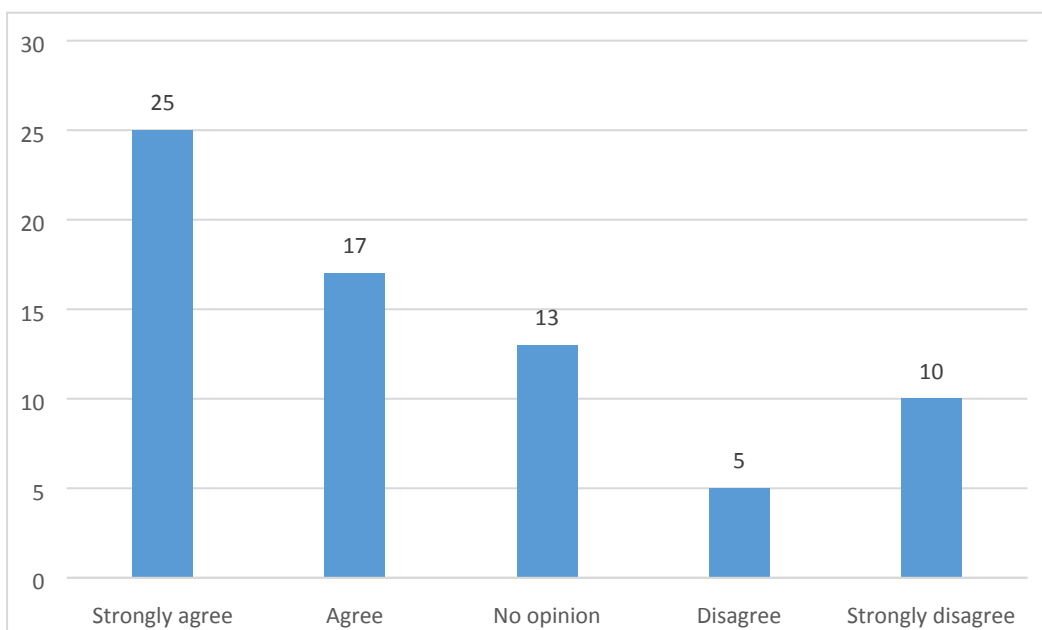
FHDC Councillor	1
SEBC Councillor	1

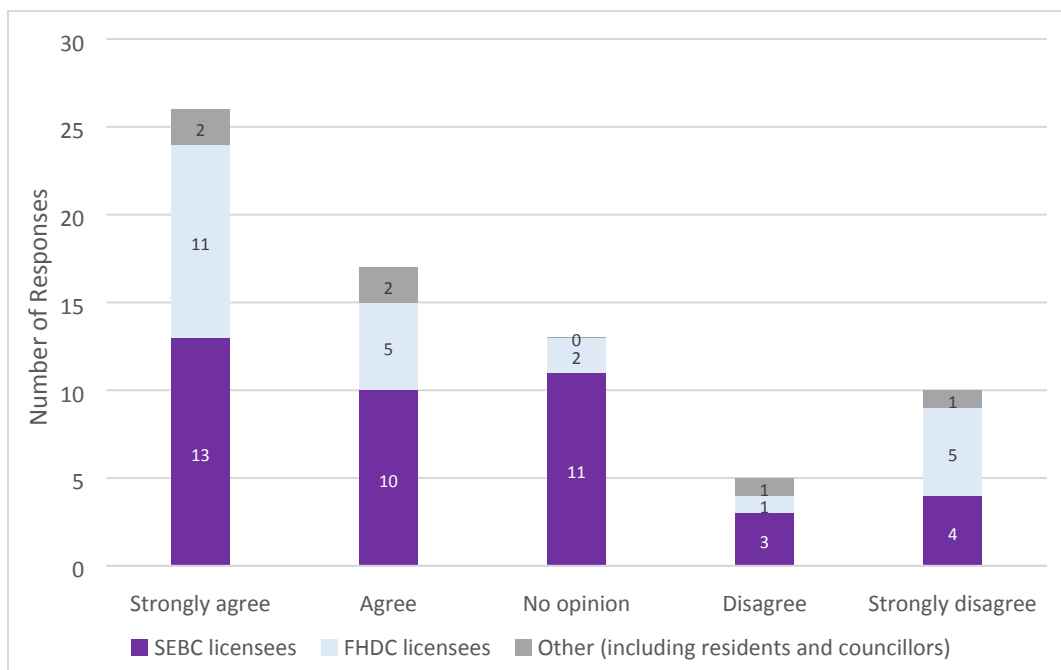
93% of respondents live in West Suffolk:



2. Hackney zones

The majority of respondents (60%) either strongly agreed or agreed with the proposals to keep the St Edmundsbury and Forest Heath areas as hackney zones.





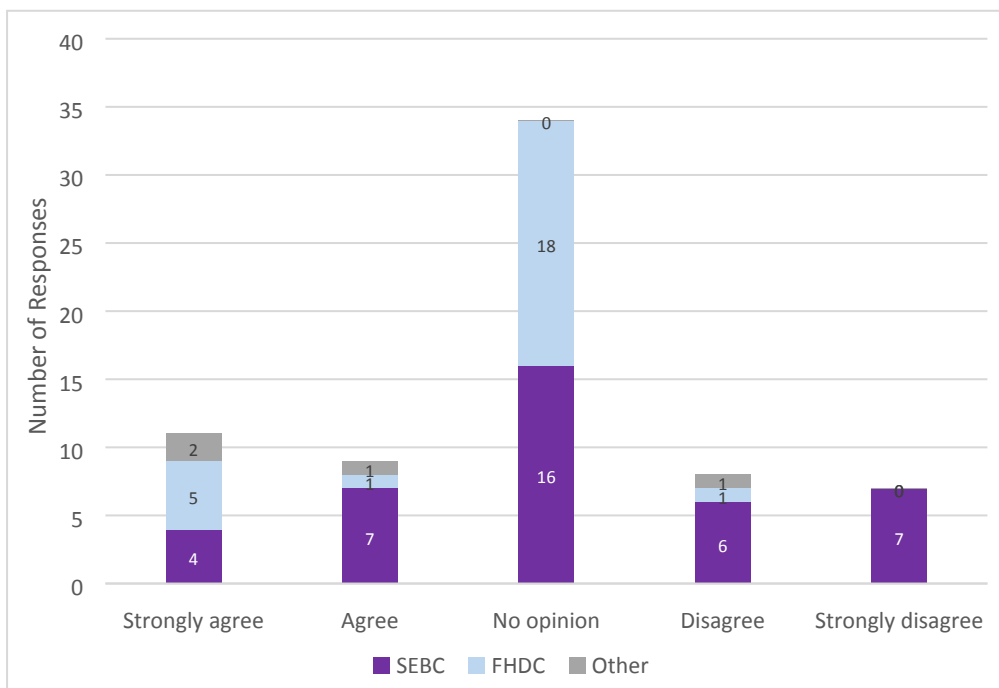
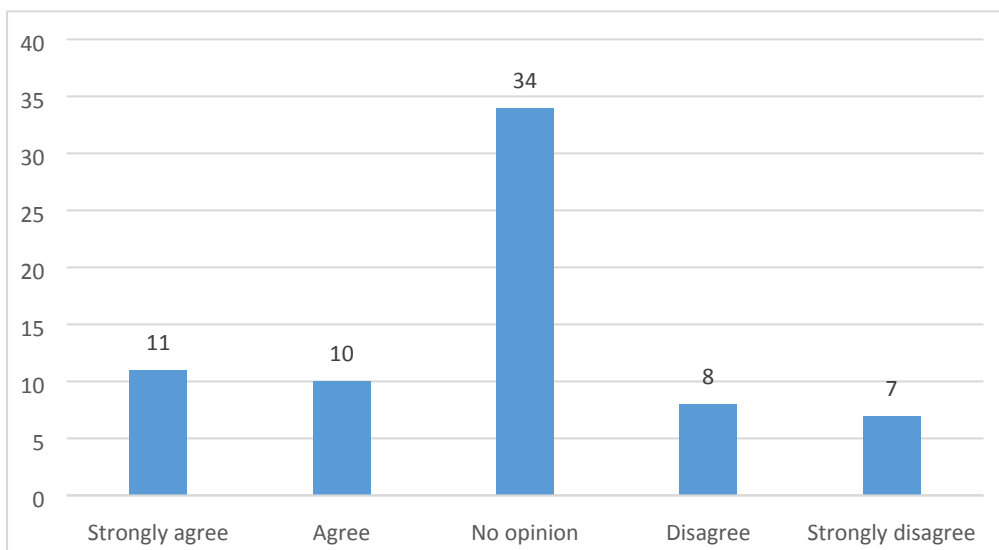
38 respondents gave a reason for their answer. The following themes represent some of the reasons given:

Theme	Example quote
Hackney zones are bad practice, unfair and go against Government advice	<i>"...It is now ILLEGAL to have Hackney zones in a council and for a brand new council to applaud them is disgraceful. We want and need a level playing field."</i>
Taxi drivers were advised by the Council that there would be a single zone	<i>"Were told that the tariffs are being made the same because it would be a single licence council have spent time and money changing meter to find we have been conned."</i>
Separate zones will harm wheelchair users	<i>"Wheelchair users will find that some West Suffolk Taxis refuse to pick them up because the Taxi is from another part of the council. This may be ok in the strict legal sense but it is morally wrong and will cause hurt."</i>
Keep zones separate as more taxis could mean over saturation in some areas	<i>"Zones need to be kept separate, otherwise drivers could cherry pick saturating one area whilst leaving others with a poor service. It is already difficult to earn a decent living and the addition of more taxis within a certain zone would make the situation worse."</i>
Unfair for hackney drivers based at RAF Lakenheath taking military personnel to Bury St Edmunds	<i>"As a FHDC driver, based on RAF Lakenheath, I often take customers into BSE - the current situation means I have to return empty - on occasions I have had to refuse a request from American personnel standing outside a venue as I cannot pick them up. My understanding one council, and the fees I pay to one</i>

	<i>council should eliminate this issue. Or is it a threat to BSE business?"</i>
One zone would make journey times too long for customers	<i>"Journey times would be too long to make sense, but of course if a passenger is picked up in they could as now be taken to the other."</i>
There is currently not enough space on the ranks – a single zone would make this worse	<i>"Not enough space on the rank or work to start spreading into each other zones."</i>

3. Abolish the zone in Haverhill

The majority of respondents had no opinion on the abolishment of the zones in Haverhill.



22 respondents gave a reason for their answer:

Abolish ALL Zones and let us trade fairly!!! Stop protecting the few and work for the many including residents.

Needs sorting for all parties concerned.

As a private hire driver I am not affected.

what zone in Haverhill???

This allows BSE to extend range but once again not me !

It is a long way from either zone and could lead to more expensive journeys, I would have thought local taxi service would suit best.

no nothing about Haverhill zone

do not live in haverhill

where are the Haverhill drivers going to plot up not bury or forest heath I hope!

Abolish all zones. 1 zone West Suffolk.

No zones so content

Haverhill is expanding rapidly therefore there could be more demand for taxis.

Consolidate with two zones which will reduce the admin running costs.

Haverhill needs a hackney zone as town is expanding rapidly there may be more need to taxis.

Haverhill is totally different to the other two and should remain the same.

This anomaly should have been sorted years ago. SEBC should have been one operating area

It would all depend upon which Zone Haverhill would become absorbed within, I would imagine if drivers and operators of FHDC and SEBC were advised under which zone Haverhill would operate there would be a more defined answer.

It works fine as it is and everyone's happy with it. Why change for the sake of it?

As rank in Bury is swamped with taxis at the moment need to look at plate issuing.

If taxis were parked on rank people would congregate outside kebab house and go to taxi rank or book private hire and make police's job easier.

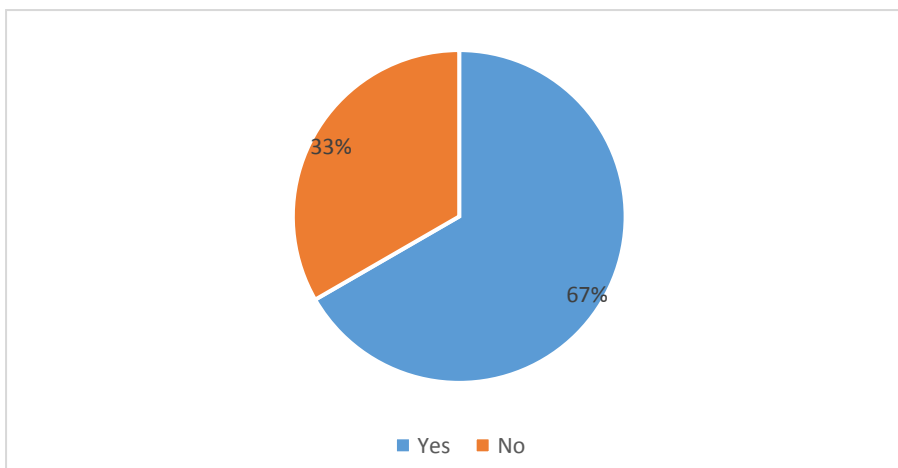
90% of Haverhill drivers and Bury drivers are very happy with the current set up so why change it? It will affect Bury's taxi earnings.

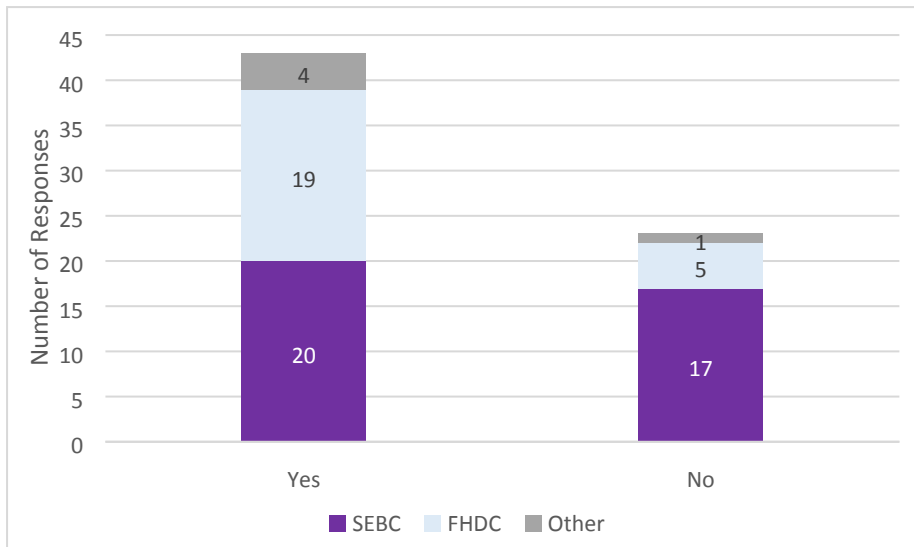
I have no knowledge of the Haverhill zone.

All existing zones should be kept.

4. Proposed age limits for Wheelchair accessible hackney vehicles

The majority of respondents (44, or 67%) agreed with the proposed age limits for wheelchair accessible vehicles:





12 respondents gave a reason for their answer:

First grant should be 3 years as the 12 month first grant restriction was put in place to protect the few and stifle competition from potential new traders.

I just believe the 12 month first grant is too strict, 3 year 3 months is fair for first grant and replacement. It should be the same.

It should remain new vehicles to receive a free plate there are too many disabled vehicles already (very few doing wheelchair work)

Harmony needed

if a car is in good condition and passes all its test each year there should be NO age limit

As a private hire driver I am not affected.

with the changes with requirements for electric vehicles there are not enough that could be used for hackney usage

I do not understand the rationale in making it more difficult and more expensive to add a wheelchair accessible vehicle to the fleet of taxis within west suffolk, surely everything should be done to make it easier.

Vehicles need to be suitable for the job and well maintained.

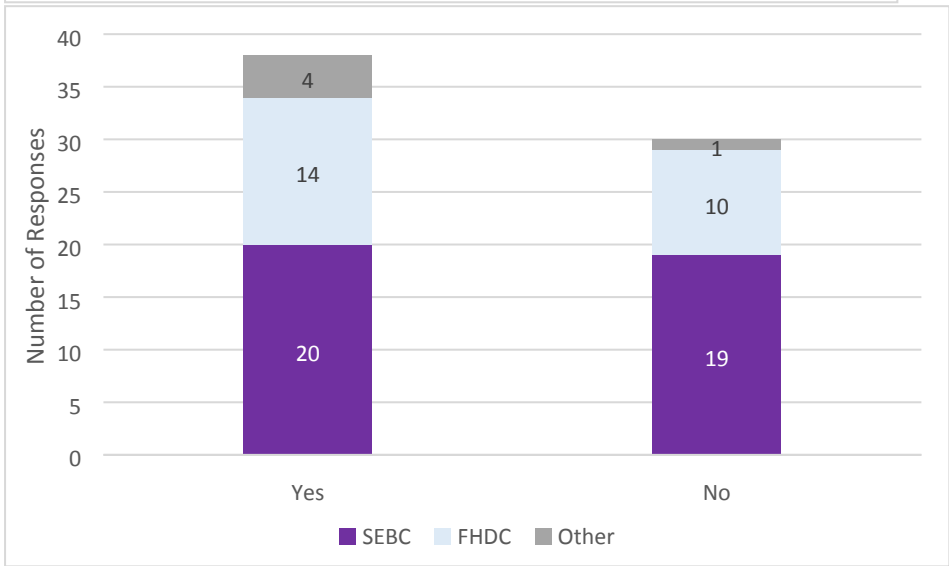
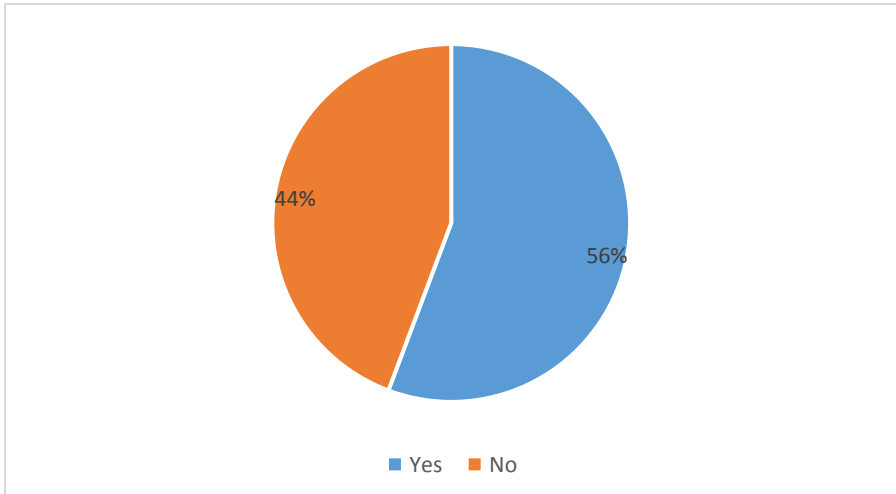
First grant should be new as the market will become flooded and the ranks are already oversubscribed.93 Hackney vehicles in Bury st Eds and all new ones to be wheelchair friendly are large 8 seaters....and only rank space for 9 vehicles !!!!!

Why are Haverhill taxis not using metres as it states metres must be on when taxi pulls away with customer in taxi?

12 months first grant is very restrictive and the aim is to keep the number of wheelchair hackneys artificially low. This is another 'Bury St Edmunds' led policy.

5. Proposed aligned age limits for saloon hackney vehicles

Respondents were almost split on the proposed age limits for saloon hackney vehicles. 39 respondents agreed with the age limits 31 did not agree.



14 respondents gave a reason for their answer:

Saloon Taxi should be treated with the same years as a private Hire vehicle
 Due to the amount of Hackney plates issued since deregulation tripling the amount of cars on rank there is not the income available to make it financially viable
 Five years for both districts would make a fairer compromise, Three-year-old vehicles are still commanding high prices, which is restrictive to anyone wanting to upgrade, whereas you can purchase low-mileage excellent condition five-year-old vehicles for a far more reasonable price. This would encourage owners to replace their vehicles more regularly therefore helping to raise standards and keeping emissions down.
 This would also be fairer financially on St Edmundsbury proprietors who will have to make a substantially higher payout when replacing their vehicles under the new proposals.
 The 5 year for private hire should be 3years 3month the same as hackney not 5years.
 First grant.
 I think there should be a life span for vehicles of 10 years
 I see no reason why saloon hackney vehicles should have different age requirements to private hire vehicles
 7 years is perfectly fine at the moment have tyour purchased a new motor of late pricewise its impossible to do it every 5 years
 I think you will find this is very restrictive as what is happening at the moment With the 7 year age limit is that you are plating cars for first grant with over 200000 miles on the clock because we CAN NOT afford newer vechiles with less miles because there are sooo many drivers in bury st edmunds now because you keep giving out a license to any body

who apply and not capping the number so the work is spread a lot thinner than it was 10 years ago what is wrong with say a 10 year old car that meets all the criteria of the plate test which is more affordable and a more realistic cost to ourselves.....

With the costs of running a hackney carriage spiralling I would make it easier to add replacement vehicles by aligning them with the proposal for Private Hire vehicles ie 5 yrs As previous statement

should be same as private hire

Hackney and Private Hire should have the same age limit of 5 years. With having an MOT every 6 months and a yearly taxi test which shows the vehicle being fit for purpose I see no reason why a 5 year age limit should not be the requirement.

you are pricing people out of a job, age doesnt guarentee quality, age just helps to promote the cheaper range of motors, kia, dacia

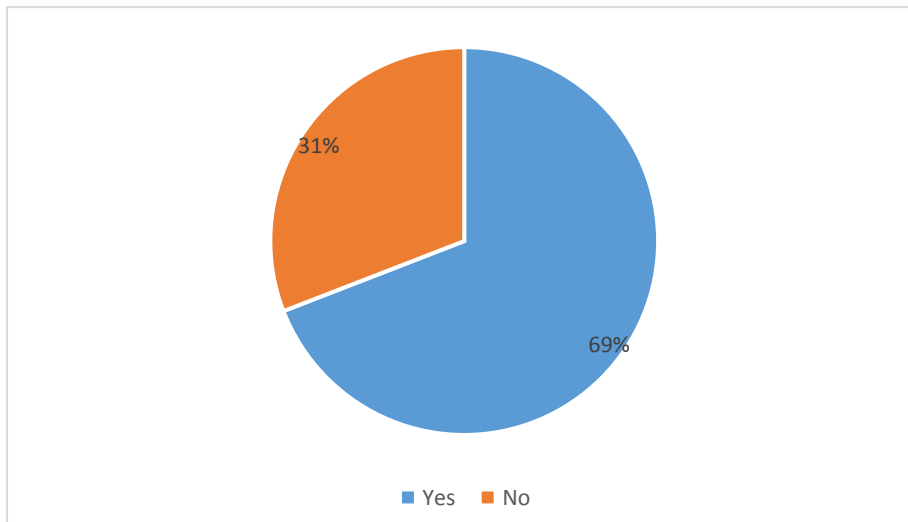
Absolutely no justifiable reason to change the limit. A 3yr 3mnth vehicle is no better than a 5 year old. It won't look smarter, which is the reason for all the changes anyway. To be safe and smart vehicles need to be properly maintained. Fares will have to rise because a 3.25 yr old car with 40,000 mls on the clock will cost around £15,000. At the end of a further 4 years it will have covered about 330,000 mls. At that point it is worthless but will need to be replaced. For a total loss of £15,000 to be imposed on drivers is unfair. It works out at a loss of £320 per month. The actual end result ill be exactly what has happened in FHDC. Cars are kept for years and years and Newmarket High Street often looks like a queue for the breakers yard.

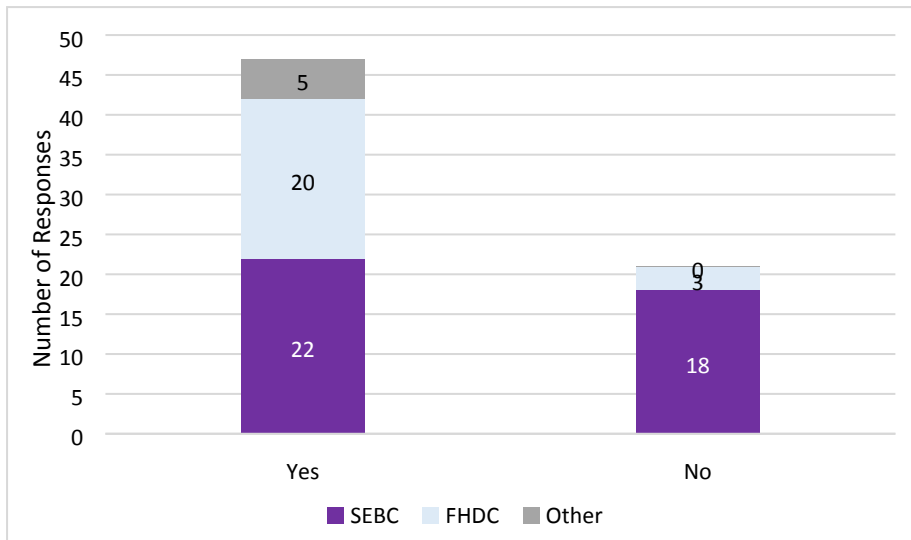
A point worth considering is why do we have to come in line with FHDC for everything? It appears to be more of a takeover than a merger.

5 years like private hire.

6. Proposed aligned age limits for private hire vehicles

The majority of respondents (47) agreed with the proposed aligned age limits for private hire vehicles. 21 respondents did not agree with the proposal.





Eight respondents gave a reason for their answer:

Yes: The 5 year is a fair compromise between Forest Heath and St Edmundsbury current years.

I am of the opinion that it should be left alone at 7 years as it currently is in Bury st Edmunds. Last year I registered a 59 plate car that had only 40,000 on the clock and was like new. The proposals do not take into account the milage of the car which we all know is a true age on which to judge a vehicle. In any case the stringent council test that all our vehicles take along with an MOT at 6 monthly intervals is perfectly sufficient in judging whether a vehicle is fit for purpose or not. Moving the goal posts in this way is not helpful to anyone trying to make an honest living.

Both Hackney and private hire should remain at 7 years

Should be the same as hackney 3years 3month not 5years

Due to the high depreciation of vehicles, this age limit can represent a considerable cost increase to some drivers.

same as for saloon hackney

Unaffordable and unrealistic to what we earn to justify the cost of a 5 year old veichle which only last on average 3 years for the type of work they do

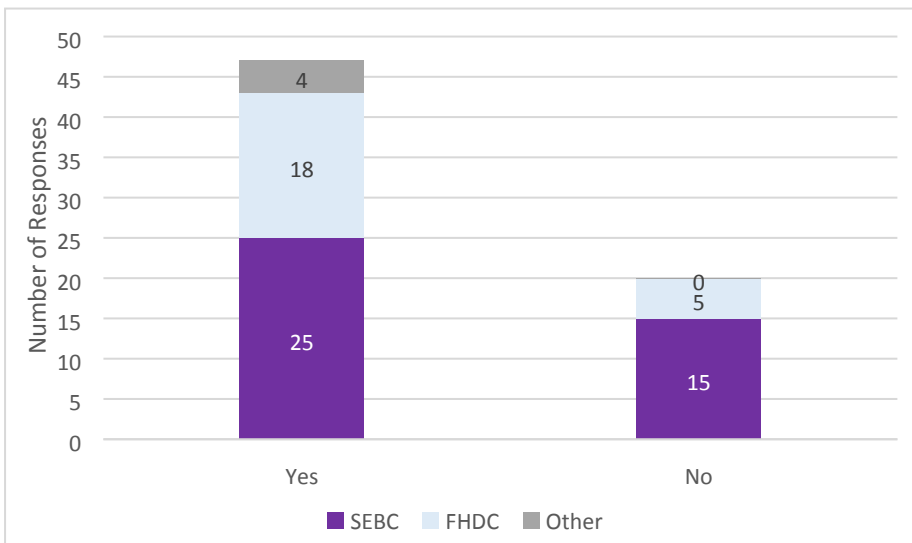
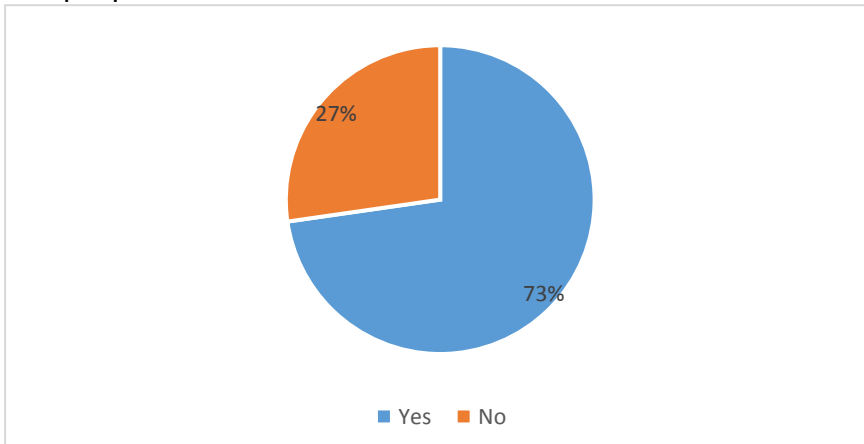
Absolutely no justifiable reason to change the limit. A 5 year old vehicle is no better than a 7 year old if properly maintained, especially as the end result will be exactly what has happened in FHDC. Cars are kept for years and years and Newmarket High Street often looks like a queue for the breakers yard. I, and any customers I have asked, find it incomprehensible that I can buy a high mileage, dubious 5 year old car from an auction and put it on as a PH car, but a 6 year old identical car with 1 owner, full service history and 39,000 mls recorded is unacceptable. It defies all the reasons put forward for the change. Whatever happens the cars will be kept for years and defeat the whole object of the exercise.

As a small PH company, we have been unable to recruit any drivers for the past 2.5 years. The cost of starting with a 7 year age limit is around £7,000. Having laid out that amount, people will go to A1 rather than a small company like ours. With a 5 year limit the cost will go up to £11 - 12,000 and a 3.25 year limit will push it to £15 - 16,000. We are small but very popular. We are honest with people, punctual, don't overcharge or steal from customers and our drivers are considerate to all, not rude, aggressive and dishonest as many others are. We turn away far more work than we ever undertake, yet this ongoing massive hike in overheads will kill the company. It won't look smarter, which is the reason for all the changes anyway, as many are now buying the cheapest small cars available, and it is well worth remembering these cheap cars do not have many of the safety features others have. Often their NiCAP safety rating is low, as is the case with some Dacia's. To be safe and smart vehicles need to be properly maintained.

There is also evidence that one company in Bury is buying loads of 6 year old cars to beat any change in the regulations.
 A point worth considering is why do we have to come in line with FHDC for everything? It appears to be more of a takeover than a merger.

7. Proposed change to the private hire maximum vehicle age exemption

The majority of respondents (48) agreed with the proposed change to the private hire maximum vehicle age exemption. 18 respondents did not agree with the proposal.



Six respondents left comments in the box provided:

As I described in last question I strongly disagree as the true age of a vehicle is its milage and not when it was manufactured. For example I could have a vehicle that is 4 years 11 months old at replacement that has covered 250,000 miles. I could also have a vehicle that is 6 years old that has covered 50,00 miles. I think this needs to be taken into account with milage clauses for vehicles that are between 5 and 7 years old. This would be a far more sensible and fair solution for all.

All regulations need merging same playing fields for all

No NO NO 10 years should be the limit age

should all be the same

As I said before: It is incomprehensible that I can buy a high mileage, dubious 5 year old car from an auction and put it on as a PH car, but a 6 year old identical car with 1 owner,

full service history and 39,000 mls recorded is unacceptable.

If a consistent standard of Council Test can be imposed, rather than the current system which seems to rely on the mood of the examiner on the day, then acceptance as a PH car should be based on the car's suitability and condition, not its age. However, while the depot testers can say things like, "Of course, if this was an MoT Test I'd have to pass your car, but because it's a Council Test I'm going to fail it," which suggest to me an examiner who considers himself all powerful with a duty to belittle drivers, no-one feels confident of a fair assessment. We've reached the stage, primarily due to one tester, where drivers can't sleep for days before a test as they're frightened of losing their living to someone's ego, as it seems any failure now the car is taken off the road. Surely, if a car is in a mechanical condition to pass an MoT test then it should pass the mechanical section of a council test, and there are many examples where this hasn't been the case, with the car being taken off the road for non safety related items. You already have a bad relationship developing over this which will only get worse

5 years like private hire.

8. Suggestions

22 respondents left comments in the box provided, however, not all of the comments were suggestions, but rather complaints about the current system.

Suggestions included those below, and officer comments are provided for each one:

- Mileage clauses for vehicles between 5 and 7 years old.
- Wheelchair assessable vehicles should be new at 1st registration and not be allowed to transfer after one year.
- Granting disabled plate should be monitored.
- If a taxi passes all its tests each year and looked after there should NOT be an age limit.
- Any hackney should be allowed to be any colour, or all stay yellow and black.
- Special age limit exemptions - if a consistent standard of council test can be imposed, rather than the current system which seems to rely on the mood of the examiner on the day, then acceptance as a PH car should be based on the car's suitability and condition, not its age.

9. Summary table of all changes

11 respondents left comments on the other changes proposed in the draft policy.

Liveries should be abolished as a point of being unnecessary expence a couple of yellow lines down the side would suffice and be cheaper

Is the colour stipulation being removed - is it discriminatory to have to have yellow on FHDC cars only?

Fare alignments are not working and are encouraging assaults on taxi drivers. Please note that the method for recording 8 seater fares on the meter has been changed from fare and a half for 5 or more people to adding on additional fares at the end. People at night see this as a driver bumping up the fare and conning the customer and is leading to verbal and physical abuse and non payment.

private hire wheelchairs, are used minimally, should be about condition not age. 5 years needs to stay at 7 as no need for reduction.

Will look at book/38 pages.

I have reviewed the issues (1-14) and have no comment to make - other than - I agree with the proposed changes. The changes reduce red tape as well as improving standards. Summary 10. please be aware that the meters have not been programmed correctly in St Edmundsbury for larger vehicles.

Since the latest meter changes the fares are wrong;

1. Bank holiday in August..stayed single fare
2.Change of method of calculating fares leading to many conflicts with public of which licensing aware.

3.Fares have been reduced by up to 40 percent and the new meter system is more open to over charging due to separate add ons

I can see problems when the Black/Yellow livery is imposed on Bury Hackneys Parking without bookings.

Taxis and private hire park in places they shouldn't i.e. outside mama pizza in Bury.

1) They block the street can't see through

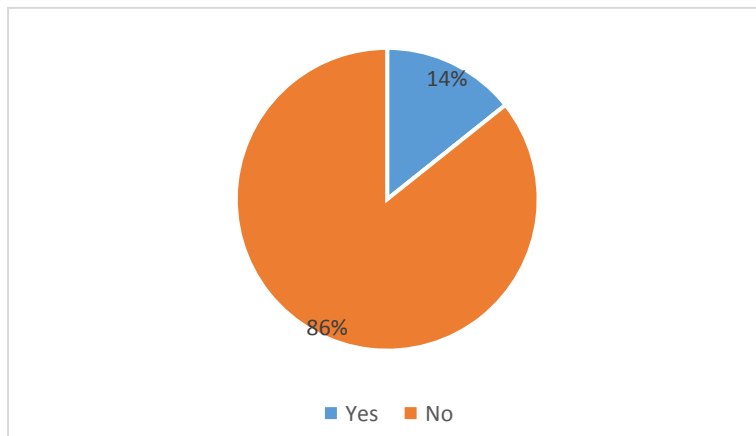
2) People congest out there because of taxis as on Saturday night fight broke out.

The Haverhill zone must of been conveniently left in the hand book so an admin mistake which does not mean it never existed. I was 100% told by yourself that it does exist so keep it so!!

Proposing these new age restrictions is likely to put self-employed drivers out of work, several already now have to rely on leasing cars from private hire operators rather than running their own vehicles. This can lower maintenance standards/ These age limits seem to exist purely to massage the egos of district councillors, rather than common sense.

10. Impact on those with a protected characteristic

54 respondents believed the proposals would not have an impact on those with a protected characteristic compared with nine who did.



Reasons given as to why the proposals will impact on those with a protected characteristic include:

- Taxis in West Suffolk will refuse to pick up wheelchair users if the Taxi happens to be in the wrong part of the council.
- Those who are not English from birth find it harder to get loans...newer vehicles will probably require finance.

- By encouraging the use of smaller cars the disabled will encounter additional problems getting into a car.
- Forest Heath has a very high percentage of Asian Hackney drivers and this is particularly noticeable in Newmarket. The proposed policy prevents these Asian drivers from working in Bury St Edmunds and Haverhill. The Zones are also discriminatory against persons with disability as Hackneys can refuse to pick them up because they are in the wrong zone.

11. Additional comments

Five respondents left additional comments:

I find this a bit of a waist of time as you will do what you want to do regardless as always Hackney Carriages should still come in all sizes and types of vehicles not just a disabled access vehicle

Consistency is essential in making this policy work

Taxi policy changes cannot safely go ahead unless the meter system is reviewed and changed.

We expect all the changes to come in as outlined because regardless of people's opinion, the Council will do whatever it sees fit. People's livelihoods are not something they consider.

We pay high fees for the privilege of operating within St Edmundsbury, yet absolutely nothing is given in return. We don't even get notified of any changes to conditions and instead find out by rumours. There is no policing of the system, even though there is a duty to provide it, and the idea of the PH and Hackney system in Bury being Fair and Reasonable is a joke. Everything at the moment is playing into the hands of the big operators at the expense of the small, and UBER have already been seen operating in Bury.

We are expected to spend thousands on cars which are then smashed to bits on the roads the council have no intention of maintaining or repairing. We struggle every day against the congestion caused by the haphazard roadwork popping up all over with no apparent planning.

There is already a shortage of drivers, as can be seen by the amount of outside cars (FHDC, Uttlesford, Cambridge and even Norwich) picking up in Bury. It's not only the shortage, but Bury has a bad reputation for cab drivers. Girls in particular will call a car from their home town rather than take a chance with a Bury Driver.

There is a great deal of work to do before Licensing has the trust of drivers.

Additional Officer Comments

Some of the suggestions and other comments above are not discussed anywhere else in the committee report or consultation documents so officer comments have been provided below.

Please note that all comments relating to hackney carriage fares or taximeters are being reviewed separately as they relate to a decision being made by the Forest Heath and St Edmundsbury Licensing and Regulatory committees.

Query	Officer comment
Why are Haverhill taxis not using meters as it states meters must be on when taxi pulls away with customer in taxi?	This is an enforcement issue

Liveries should be abolished	Liveries will be consulted upon within 2 years with a more comprehensive review
Taxis and private hire park in places they shouldn't i.e. outside mama pizza in Bury: <ul style="list-style-type: none"> i. They block the street can't see through ii. People congest out there because of taxis as on Saturday night fight broke out. 	This is an enforcement issue
Consistency is essential in making this policy work	We hope the proposals are consistent and fair
Expected to pay council a lot for the privilege of operating in St Edmundsbury when the roads are damaged by the roads 'the council' should be maintaining	The maintenance of road surfaces is managed by Suffolk County Council.
There is already a shortage of drivers, as can be seen by the amount of outside cars (Forest Heath, Uttlesford, Cambridge and even Norwich) picking up in Bury. It's not only the shortage, but Bury has a bad reputation for cab drivers. Girls in particular will call a car from their home town rather than take a chance with a Bury Driver. There is a great deal of work to do before Licensing has the trust of drivers.	We have anecdotal evidence to suggest there is saturation of taxis with St Edmundsbury and some to suggest otherwise. This why we would like to retain the licensing areas while we undertake a full review including collating evidence on supply and demand