

Appendix B: West Suffolk Council Hackney Carriage and Private Hire Conditions Policy Handbook: Consultation Survey Summary

Background

1. Public consultation took place between 27 January and 9 March 2020 on the proposed changes to the West Suffolk Council Hackney Carriage and Private Hire Conditions Policy Handbook.
2. West Suffolk Council currently licenses all hackney carriage and private hire vehicle businesses within the district. Separate licences are required for vehicles, drivers and operating companies. The policies that set out what is required of taxi drivers and operators are set out in a document known as the West Suffolk Council Hackney Carriage and Private Hire Conditions Policy Handbook.
3. In line with the creation of a single West Suffolk Council in April 2019, a new licensing handbook was produced that brought together the previous requirements of the two predecessor licensing authorities - Forest Heath District Council and St Edmundsbury Borough Council.
4. Following consultation, almost all sections of these predecessor policies were aligned, except for some requirements. It was agreed that these should be addressed in more depth following the creation of West Suffolk Council.

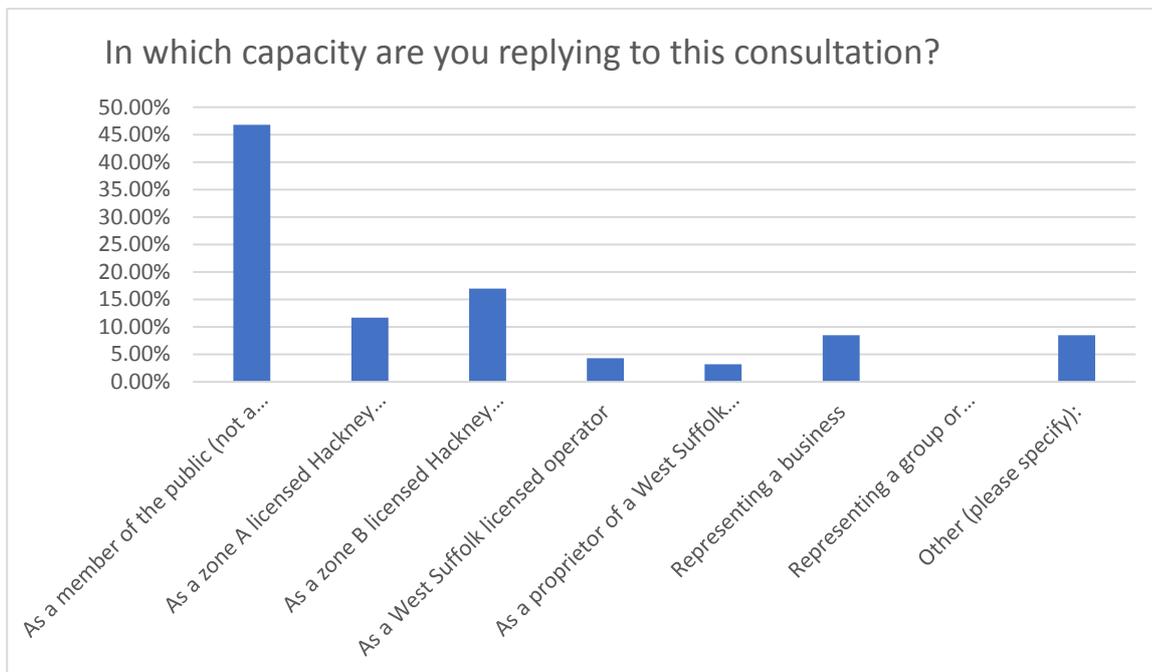
Methodology

5. During the consultation period, views were sought from the public, drivers and businesses regarding new requirements for a single licensing area, vehicle age, livery, time elapsed following convictions and other minor changes.
6. An online response form was created, and this was published through media, website, social media, councillors, staff and partner organisations.
7. In addition, the consultation was discussed at the new Drivers-forum on 17 February and the consultation was circulated among councillors. Further drop-in sessions in Mildenhall and Haverhill were held on 27 and 26 February respectively.
8. At the time the consultation closed, 80 online forms had been completed. The number of complete hard copy surveys submitted was 15. This report outlines the results from the analysis of quantitative data and themes that can be drawn from the qualitative (free text) data. In total, therefore, this report reflects feedback from up to 95 different submissions.
9. Section 1 of this report outlines the type of respondents who took part. Sections 2-4 outline the specific results for the zoning, livery, vehicle and other proposals.
10. Please note:
 - All answers are listed in descending order (except equality monitoring questions which remain in standard categories).

- A large part of the survey was made up of free text responses. These have been analysed using standard manual techniques for free text analysis, which while highly effective are unable to eliminate any degree of judgement or subjectivity.

Section 1: About the respondents

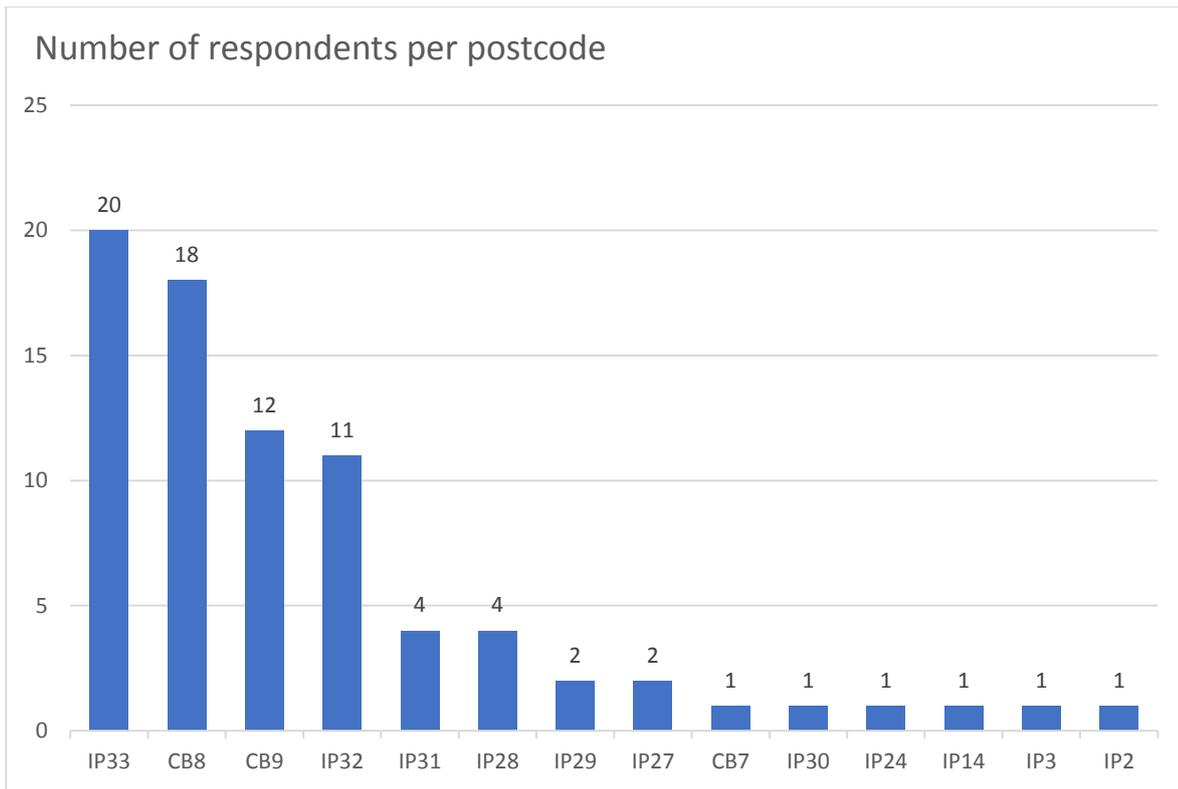
11. Of a total 95 respondents that responded online or in writing, the largest group of respondents were members of the public (46.6 per cent). 44.7 per cent responded to the survey as representatives of the taxi and private hire car industry. Of this number, the highest proportion identified as drivers from zone A (former FHDC area) (11.7 per cent) and zone B (former SEBC area) (17 per cent). Due to irregularities in the way some of the written consultation submissions were completed, some respondents selected more than a single option for this category. These respondents, and an additional individual responding as a private hire driver, are registered under 'Other' and all are members of the taxi and private hire vehicle industry (8.5 per cent).



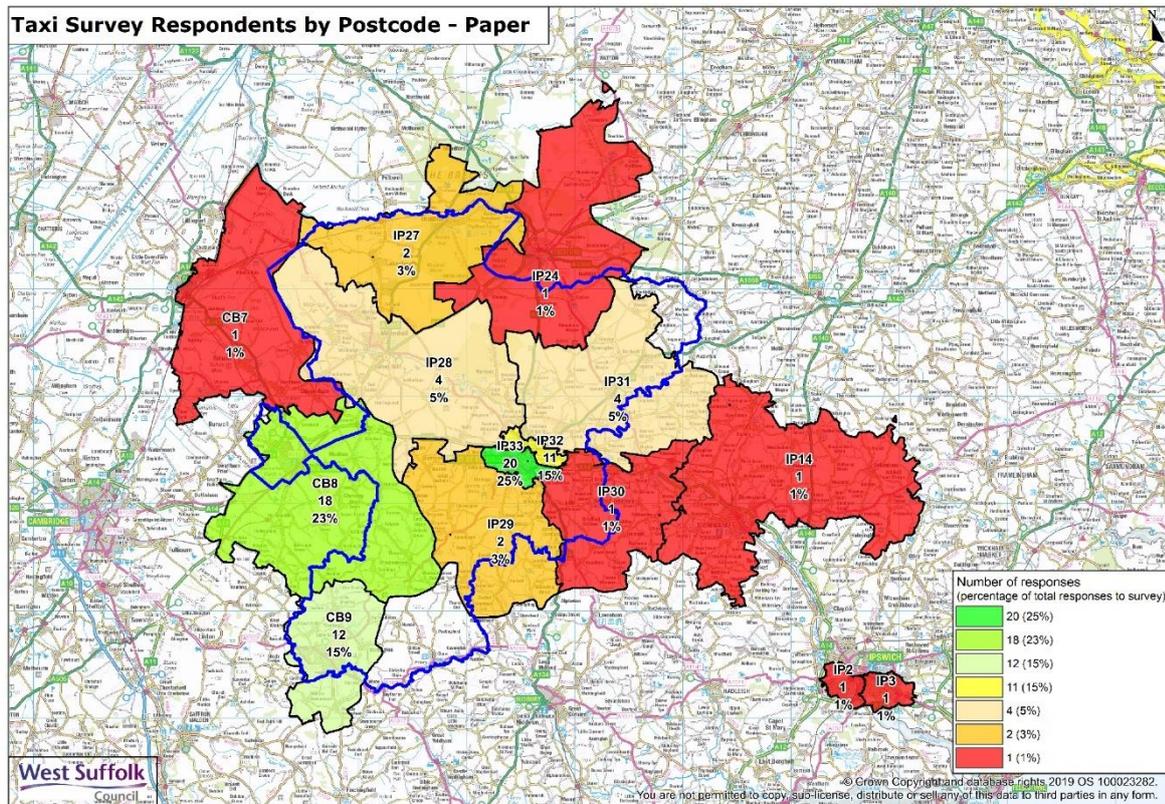
The graph highlights the that largest single group of respondents were members of the public at 46.6 per cent. 8.5 per cent of respondents represented a business, with the other 44.7 per cent representing the taxi industry in various forms.

Respondent location

12. 91.5 per cent of respondents are residents of West Suffolk. 86 of 95 complete responses (91.5 per cent) show that most respondents lived in IP32-33 (Bury St Edmunds) and CB8-9 (Newmarket).



The graph shows that the majority of respondents were residents of the Newmarket and Bury St Edmunds areas.



The map further illustrates that the majority of respondents were residents of the Newmarket and Bury St Edmunds areas.

Gender

13. The survey was completed by more males than females, with men accounting for 60.7 per cent of respondents, compared to 37.1 per cent who were female. The remaining respondents did not disclose their gender.

Age and health or disability

14. The age breakdown (see chart below) demonstrated a larger proportion of older people completed the survey; ages 35 to 70+ represents nearly 80 per cent of the total. There is no representation from those aged under 18, with very few 18-24-year olds also. 12.4 per cent of respondents also stated that they had a longstanding disability, illness or infirmity, which is below the Suffolk average of 18 per cent – this is taken from 2011 'Census data – Day to Day activities': 10.1 per cent limited a little; 7.9 per cent limited a lot.

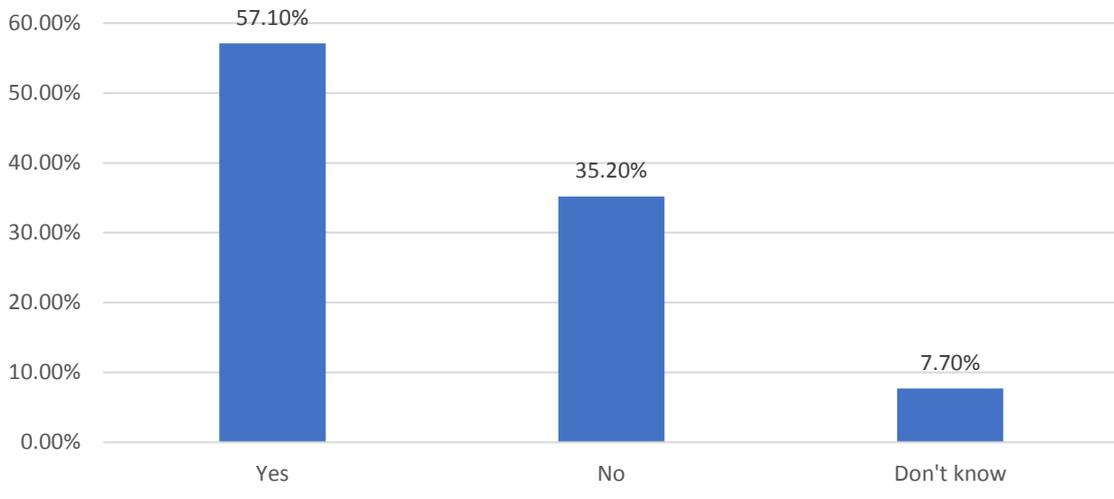
Age breakdown of respondents		
Age categories	% in each category	West Suffolk % (2018)
0-17	0	21.1
18-24	4.6	7.7
25-34	17.2	13.8
35-44	29.9	11.5
45-59	26.4	19.5
60-69	16.1	10.9
70+	5.7	15.5

Section 2: Question 5

Licensing areas

15. Proposal 1 refers to creating a single licensing area in West Suffolk. Of 91 responses, 52 (57.1 per cent) agreed to this proposal. 32 (35.2 per cent) answered 'No' to the proposal.

Please refer to proposal 1 of the summary of proposed changes document. Do you agree with the proposal? Please provide a reason for your answer (optional).



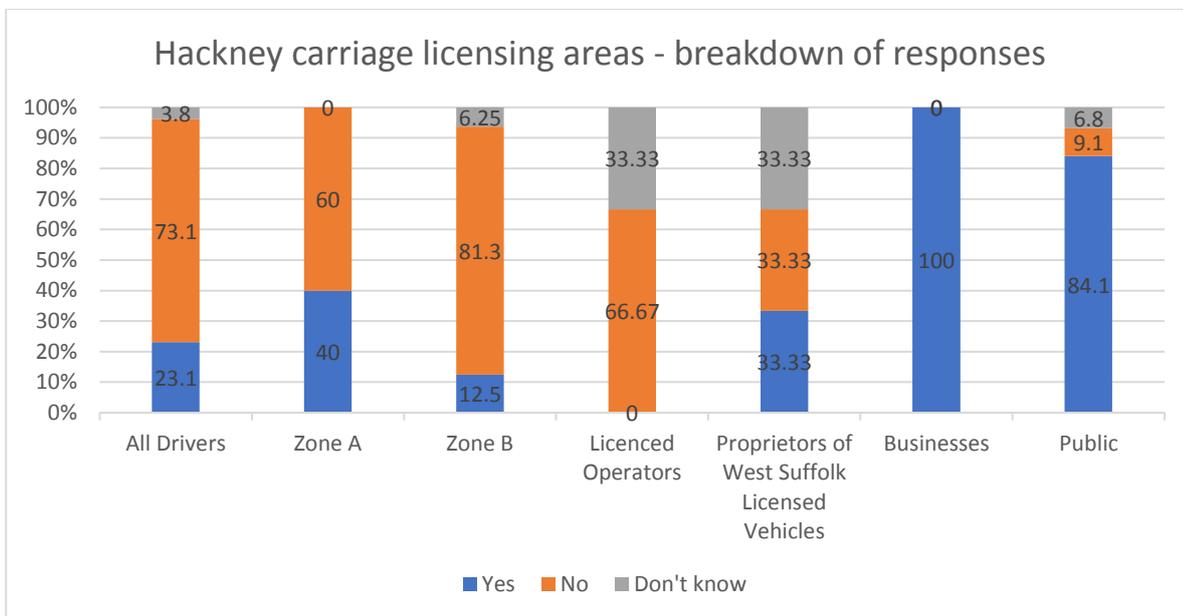
The graph indicates that most respondents agree with proposal 1 – with 57.1 per cent agreeing and 35.2 per cent disagreeing. 7.7 per cent answered don't know.

16. Eight (100 per cent) respondents representing businesses and 37 (84.1 per cent) of members of the public were in favour of this proposal. These figures were reinforced with seventeen respondents providing a free text reason for their answer; eleven comments indicated that respondents felt this proposal represented a 'common sense' initiative for West Suffolk.

Comments - Yes	Frequency of inclusion
Common sense proposal	11
Uniform approach across district or increase efficiency	4
Reduced emissions	2
Opens up the market	1
Will improve number of taxis to a more adequate level	1
Good for the area	1
Wheelchair users should be allowed options	1
Want in place by end of 2020	1
Support for livery for safety reasons	1

17. Conversely, 73.1 per cent of all drivers (Zone A and B) that responded online were opposed to the proposal. 66.7 per cent of all respondents that were representatives of the taxi and private hire vehicle industry also opposed. Twenty-two said that the provision of taxi and private hire cars in Bury and or Newmarket was already either too high or adequate.

Comments - No	Frequency of inclusion
Too many taxis	13
Enough taxis	9
Not viable – less trade	4
Driver knowledge of new areas insufficient	2
Favours bigger companies	1
May lead to areas without taxi cover	1
Will cause disruption	
Will not reduce emissions	1
Don't want livery	1
Private hire vehicles shouldn't pick up without pre-booking	1



Graph illustrates a breakdown of responses as a proportion of each group of respondents. This shows that a high proportion of members of the taxi industry disagreed with the proposals, while very few members of the public disagreed with the proposal.

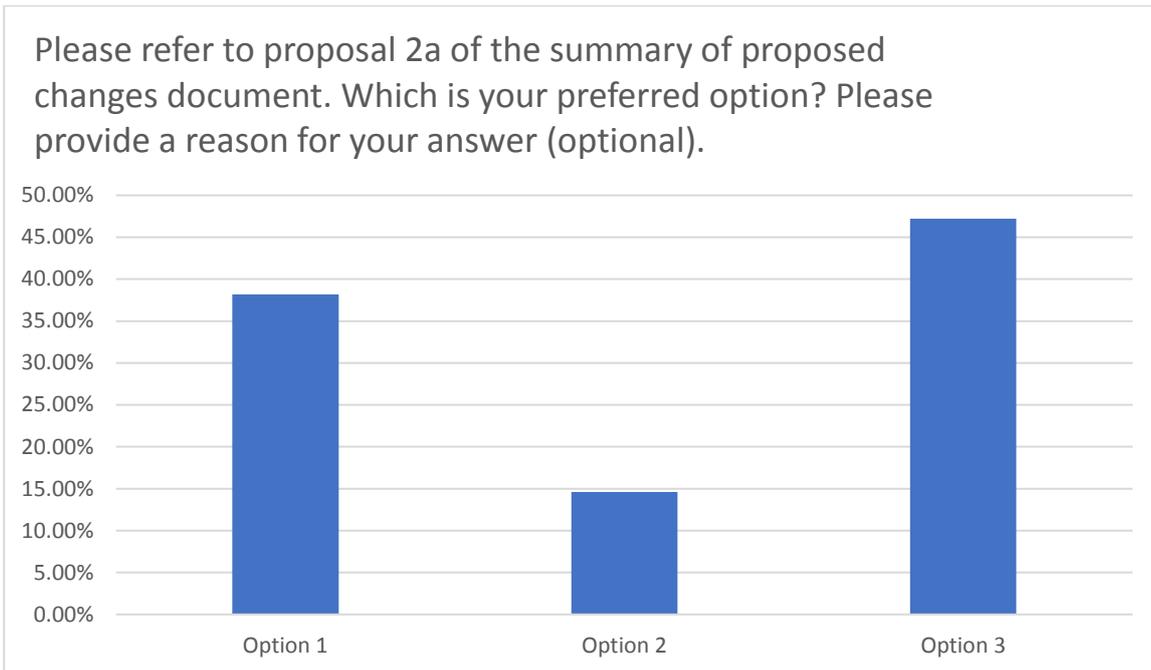
Section 2: Questions 6 – 8

Hackney carriage livery

18. Proposal 2a refers to a range of options for a potential future livery requirement for hackney carriages. This was listed in three options:

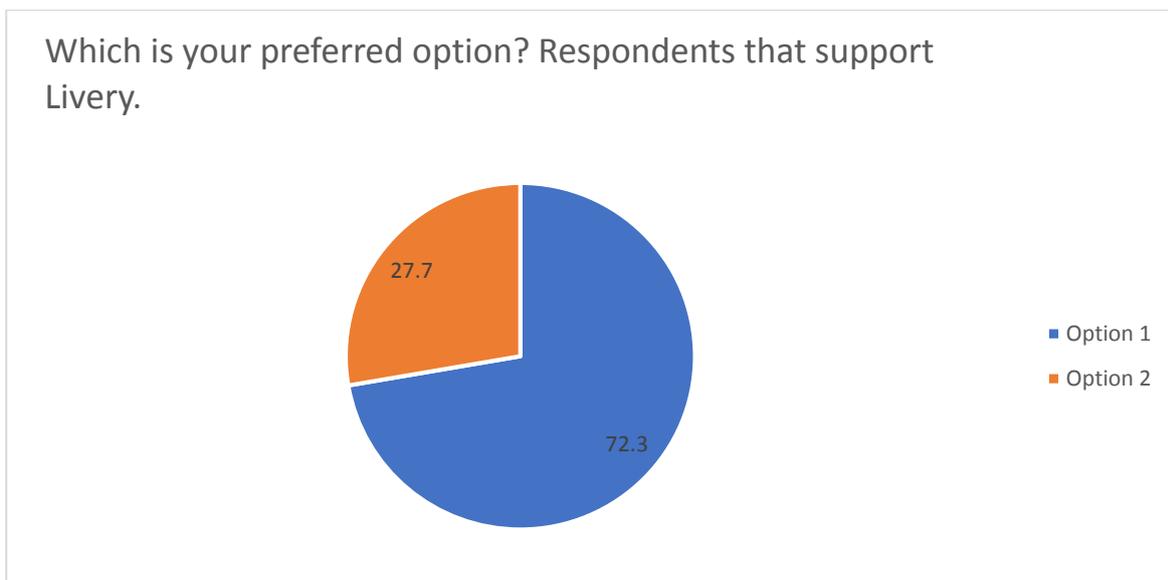
- Option 1 - A livery requirement of black vehicle plus yellow boot and bonnet wrap for all hackney carriages in West Suffolk.
- Option 2 - A livery requirement of black vehicle plus a coloured boot and bonnet wrap (other than yellow) for all hackney carriages in West Suffolk

- Option 3 – No livery requirement



Graph shows that most respondents (47.2 per cent) favoured Option 3. The second most popular proposal was Option 1 at 38.2 per cent. And Option 2 was selected by 14.6 per cent of respondents

19. Of all 89 respondents, 52.8 per cent supported the use of a livery. 38.2 per cent preferred Option 1; 14.6 per cent for Option 2. 63.8 per cent of respondents who supported the adoption of a livery were members of the public, with businesses the next largest group at 17 per cent. 72.3 per cent of respondents who supported a livery preferred Option 1.



The pie chart shows that of the respondents that favoured a Livery, the most popular option was Option 1 at 72.3 per cent, with Option 2 at 27.7 per cent.

20. 42 respondents preferred no livery requirement. 69.1 per cent of this number were representatives of the taxi and private hire industries. 31 per cent were members of the public.

Hackney carriage livery comments – support livery	Frequency of inclusion
Yellow is an easy colour to assist identification	5
Support livery – but a colour other than yellow is preferable	4
It will provide alignment across West Suffolk	3

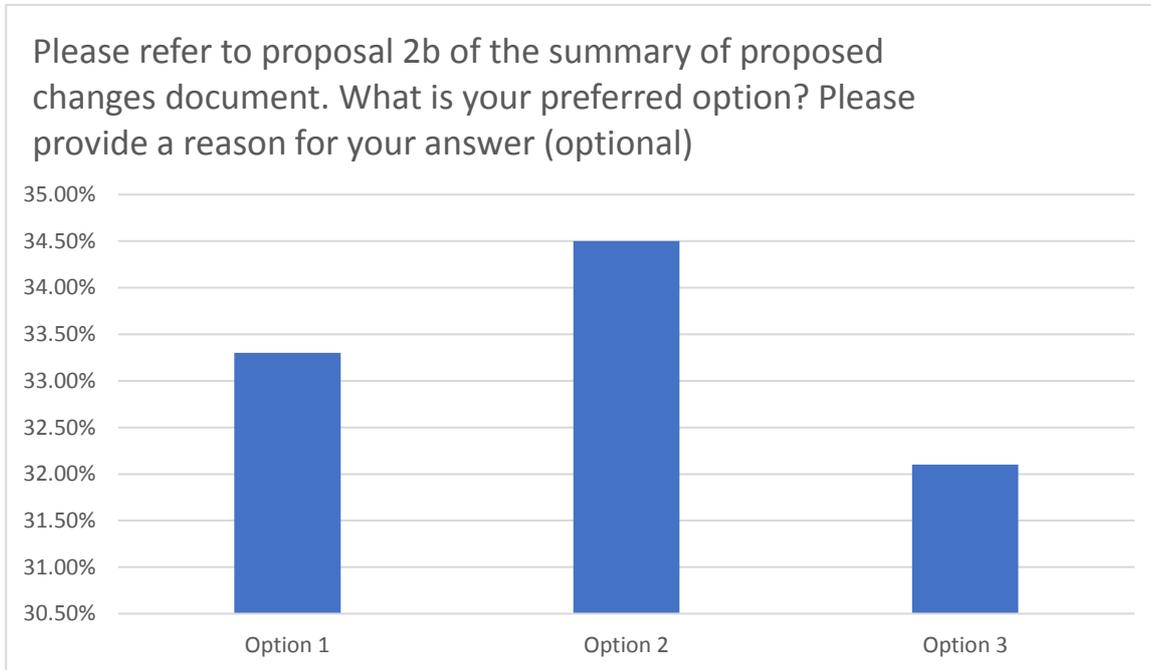
Hackney carriage livery comments – oppose livery	Frequency of inclusion
Expense for industry	19
Already have sufficient means of identification	13
Will impact on the individual identity of Taxi firms	2
Aesthetics – will make the car ugly	1
Aesthetics – will make towns look tacky	1
Safety – passengers rely on colour rather than licensing	1

21. Respondents who chose Option 2 were asked to complete an additional free text question to indicate which livery colour scheme they would advocate. A total of twelve colours and colour combinations were put forward. The most popular individual colour was Blue. Black with another colour (red, yellow and blue were suggested) was also popular.

Colours suggested	Frequency of inclusion
Blue	3
Black with another colour	3
Beige	2
Pink	1
Pink and purple	1
Black	1
Silver	1
Silver and blue	1
Green	1

22. Proposal 2b set out options for potential implementation of a possible new livery, as set out in proposal 2a. Three options were provided:

- Option 1 - The new livery is only required for new or replacement vehicles from the implementation date of the policy.
- Option 2 - The new livery becomes a requirement for all vehicles (including existing) from 1 January 2025.
- Option 3 - An alternative implementation timetable.



The graph indicates that respondents were quite evenly split of this proposal, Option 2 was the most popular at 34.5 per cent; 33.3 per cent of respondents preferred Option 1; and 32.1 per cent of respondents choosing Option 3.

23. In total, 84 respondents answered this question and the response preferences were quite evenly split. 33.3 per cent of respondents preferred Option 1; 34.5 per cent for Option 2; and 32.1 per cent Option 3. A free text comment option was provided for respondents to offer a reason for their answers.
24. The reasons provided by respondents who selected Option 1 were that they either considered it to be the cheapest option, or that a rush to implement in 2024 could be avoided through a staged approach to implementation.
25. For Option 2, three respondents said that they considered a 5-year timetable to be enough time to properly implement any potential changes. One respondent said that this would be the cheapest option. Another considered a clear set deadline would be best for passengers, citing safety as the key consideration for a quick implementation. Two respondents said that they selected this option as they are due to leave or retire before 2025 and another indicated that their preferred option would be to avoid livery implementation.

Comment – Option 1	Frequency of inclusion
Cheapest option	2
Prevents a rush to deadline in 2024	1

Comment – Option 2	Frequency of inclusion
Five years is enough time	6
Will have left or retired by time of implementation	2
Cheapest option	1
Safety of passengers	1
Preferred option not to implement livery	2

Comment - Option 3 preferred timetable	Frequency of inclusion
Never or do not implement livery	13
Immediate implementation, or as soon as possible	3
2021	2
2022	2
2040	2
2027	1
2023	1
2050	1

26. Respondents who selected Option 3 were invited to answer an additional free text question to state their preferred timetable. There were twenty comments provided in all, with the most frequent saying that a Livery should not be implemented.

27. Please note: the answers provided by Option 3 respondents under comment and question 8 have been combined to avoid duplicate responses

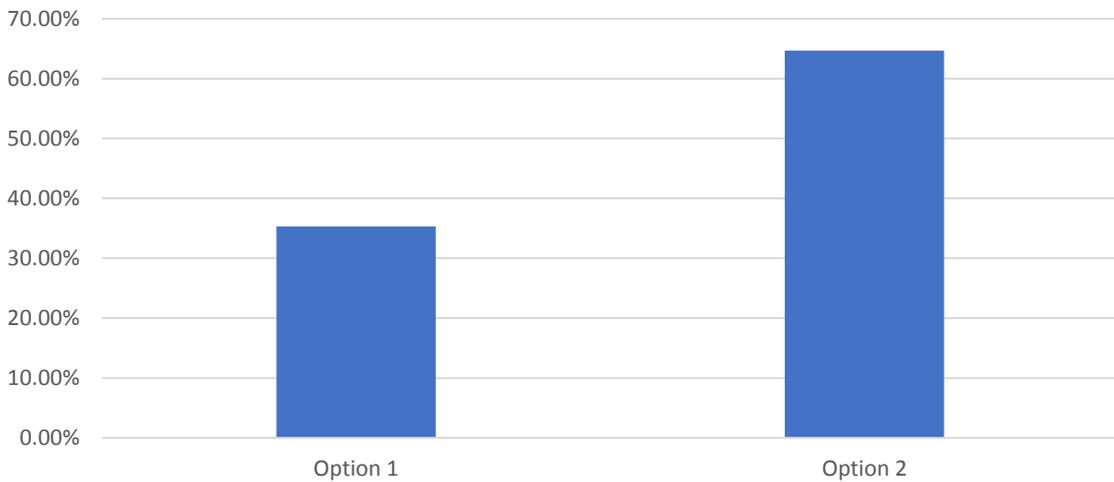
Section 3 – Questions 9-11

Private hire livery

28. Proposal 3a refers to a potential future livery requirement for private hire cars. Two options were consulted on:

- Option 1 - A livery requirement of silver or white vehicles for private hire in West Suffolk (on the basis that white and silver finishes are the cheapest to purchase).
- Option 2 - No livery requirement.

Please refer to proposal 3a of the summary of proposed changes document. What is your preferred option? Please provide a reason for your answer (optional)



The graph shows that Option 2 is the most popular at 64.7 per cent compared to 47.3 per cent for Option 1.

29. Of 85 responses, 64.7 per cent of all respondents selected the option for there to be no livery requirement for private hire vehicles. 47.3 per cent were members of the public; a total of 50.9 per cent of respondents were members of the taxi and private hire industry.
30. The free text comments provide greater clarity around why respondents selected Option 2. Seven respondents cited that a livery was unnecessary as cars are pre-booked, with passengers provided with a description of the car for pick up. Seven respondents also stated that the cost of implementation was unnecessary or prohibitive.

Comment -Option 2	Frequency of inclusion
Cars pre-booked with description provided	8
Cost of implementation	8
Cause confusion at popular venues	3
No livery required	4
Current identification sufficient – stickers + licenses	5
Will not adhere to livery even if implemented by council	2
Colours suggested by council will not aid identification	1
Identity of companies will be affected	1

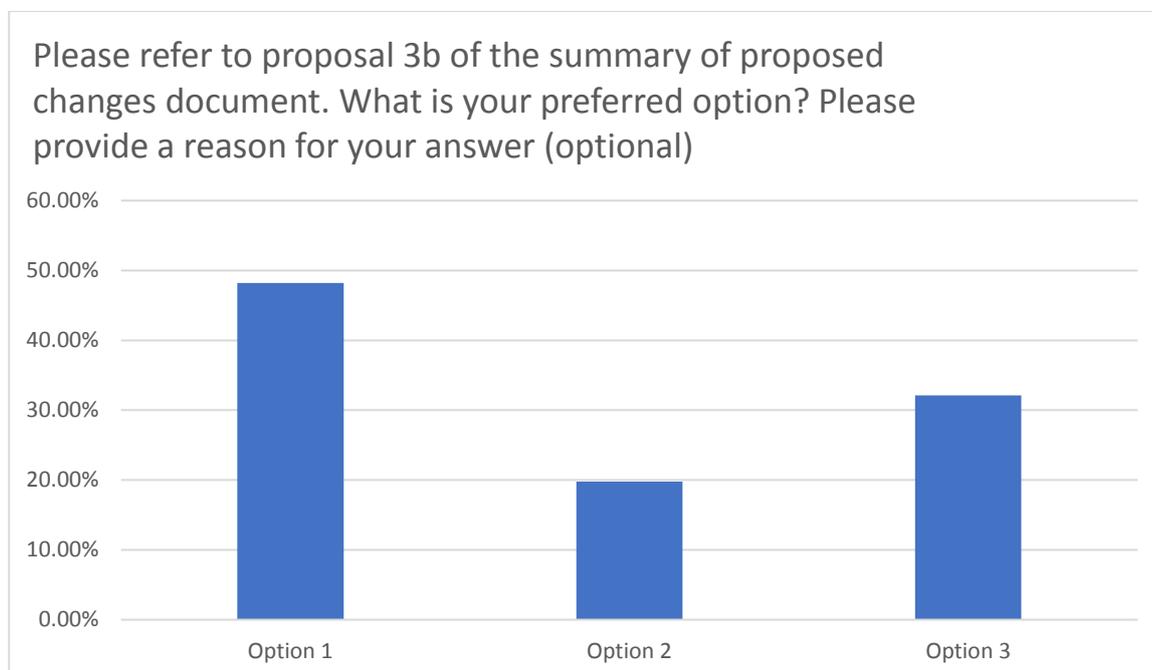
31. 46.7 per cent of respondents who selected Option 1 were members of the public; 23.3 per cent identified as representatives of business; and 30 per cent

represented the Taxi and Private Hire Car Industry. The most frequently cited reason for support of Option 1 is that a Livery will make Private Hire vehicles easier to identify and distinguishable from Hackney cars.

Comment – Option 1	Frequency of inclusion
Will make it easier to identify or distinguish between hackney and private hire	4
Good idea or common sense proposal	2
Better regulation of the industry	1
Help traffic management staff distinguish between hackney and private car	1
More environmentally friendly	1
Will look nice	2

32. Proposal 3b set out options for potential implementation of a possible new livery, as set out in proposal 3a. Three options were provided:

- Option 1 - The new livery is only required for new or replacement vehicles from the implementation date of the policy.
- Option 2 - The new livery becomes a requirement for all vehicles (including existing) from 1 January 2025.
- Option 3 - An alternative implementation timetable.



The graph shows that respondents preferred Option 1 at 48.2 per cent; 32.1 per cent favoured Option 3 and 19.8 percent Option 1.

33. In total 81 respondents answered this question. 48.2 per cent of respondents preferred Option 1; 19.8 per cent Option 2; and 32.1 per cent Option 3. A free

text comment option was provided for respondents to offer a reason for their answers.

34. Only nine respondents that selected Option 1 or 2 provided a comment.

Comment – Option 1	Frequency of inclusion
Cheapest option	2
Phased approach preferable	1
Easier to phase in with livery	1

Comment – Option 2	Frequency of inclusion
Allows time to implement	3
Represents earliest fixed date	1
Will be retired by 2025	1
Safety of the public is the key issue	1

35. Respondents who selected Option 3 were invited to answer an additional open text question to state their preferred timetable. There were nineteen comments provided, with the most frequent saying that a livery should not be implemented.

36. Please note: the answers provided by Option 3 respondents under comment and question 8 have been combined to avoid duplicate responses

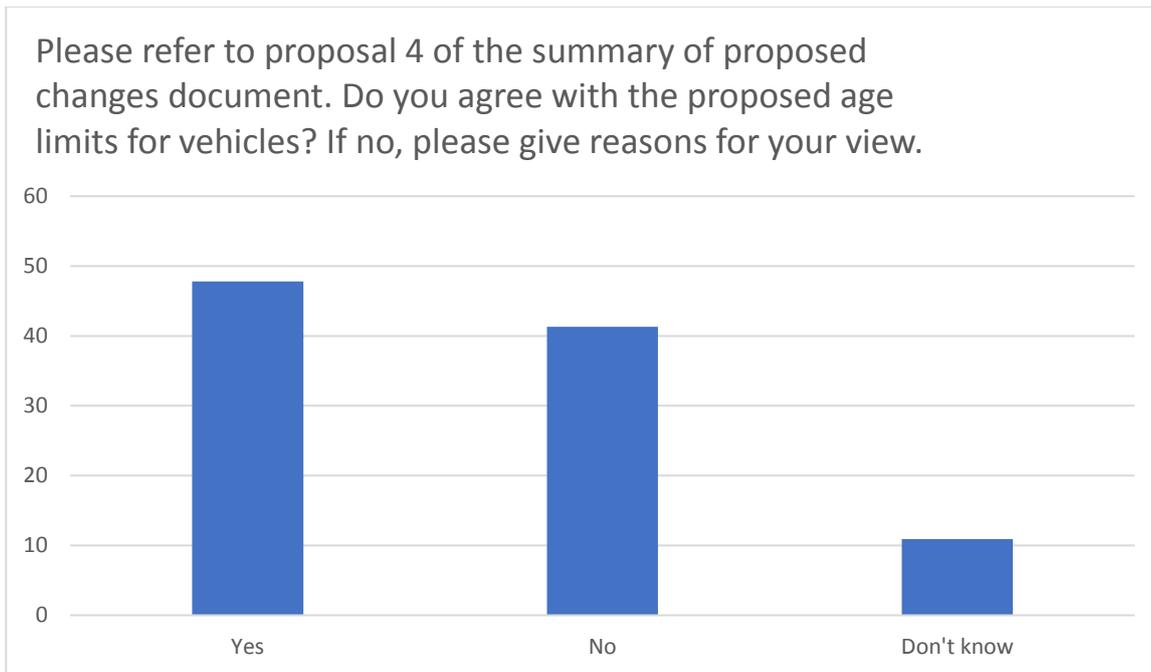
Comment - Option 3 Preferred timetable	Frequency of inclusion
No livery or expense unjustified	10
As soon as possible or 2021	3
Only for new vehicles	1
2022	1
2025	1
2040	1

Section 4 – Questions 12-17

Proposal 4 – Question 12

Age of vehicle

37. Proposal 4 refers to the age of vehicle, with a proposed maximum age requirement of 10 years to all except electric or zero emission vehicles; as well as a maximum age of five years for saloon vehicles upon first registration. 47.8 per cent of 92 responses were in favour of this proposal; 41.3 per cent were opposed.



The graph shows that 47.8 per cent answered yes to proposal 4; 41.3 per cent answered no and 10.9 per cent answered don't know.

38. 68.2 per cent of those that selected 'Yes' in the online survey were members of the public, with 14.6 per cent representing businesses. These answers were accompanied by eleven additional comments that highlighted that lower emissions and environmental impact were a prime reason for agreeing with this proposal. One comment indicated that the longer length of ownership would make it easier for taxi and private hire drivers to convert to electric due to costs. Five comments stated that this proposal would keep standards high or vehicles safe. However, one commenter raised concerns that the upper age limit could negatively affect part time or older drivers.

Comment	Frequency of inclusion
Lower emissions or environmental impact	5
Keeping standards high or vehicle safety	5
Vehicles should be three years old	1
Personal choice	1
Reservations about impact on part time and older drivers	1

39. Most respondents that selected 'No' to Proposal 4 were members of the taxi and private hire industry. 76.3 per cent of respondents were industry representatives. 21 per cent were members of the public and 2.6 per cent were business representatives.

40. 33 of the 38 respondents who answered 'No' to proposal 4 provided an additional comment. Fifteen commented that vehicle standards, through MOT and council tests, as well as the required Euro 6 emission standard, were sufficient to guarantee quality and lower emissions. Six highlighted the cost to the industry,

with one respondent suggesting that it could force drivers to buy cheap rather than quality vehicles and two other respondents highlighting the impact on saloon drivers. Other comments cited that such limits should apply to low emission vehicles as well, due to the need for regular maintenance; that environmental impact of converting to lower emission vehicles would be negated by the impact of scrapping the current fleet; and that the focus should not be on the age of the vehicle, but the CO2 emissions of the vehicle as a way of lowering carbon impact.

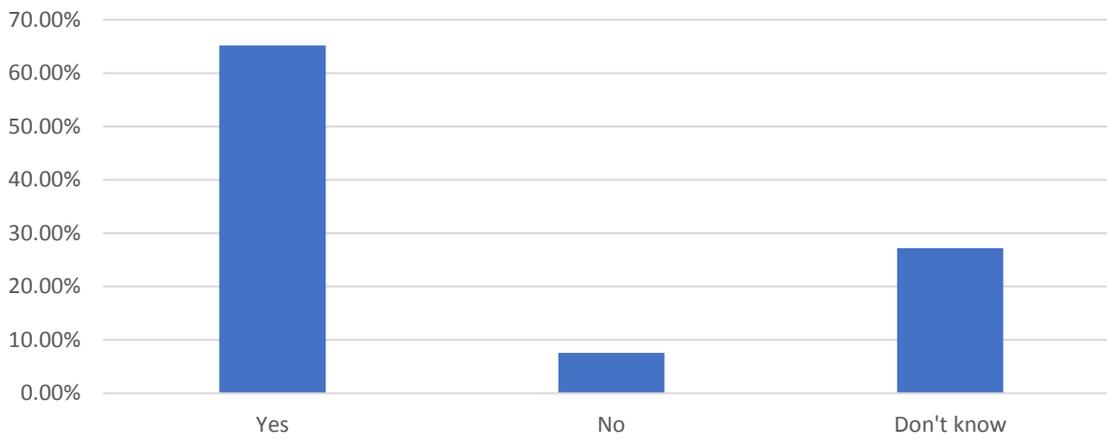
Comment	Frequency of inclusion
Vehicle standards (MOT, council tests, Euro 6) are sufficient	15
Cost to industry	6
Age limit should be set at 15 years max	3
Lower emissions negated by impact of scrapping serviceable vehicles	2
Similar age limits should apply to electric or low emission	2
Focus should be on CO2 and wheelchair accessibility	2
Many cars over 10 years old	1
Age limit should be 12 years max	1
Negative impact on part time drivers	1
Electric or lower carbon vehicles not good enough	2
Many coaches or buses over 10 years old	1
Customers don't care about car age	1

Proposal 5 - Question 13

Engine capacity requirements

41. Proposal 5 referred to proposed new engine capacity requirements for private hire and hackney carriages and consultees were asked whether they agreed with this potential change. Of the 92 responses to this question, 65.2 per cent agreed with the proposal. 7.6 per cent disagreed and 27.2 per cent did not know.

Please refer to proposal 5 of the summary of proposed changes document. Do you agree with the proposed engine capacity requirements for private hire vehicles and hackney carriages? If no, please give reason for your view.



The graph shows a majority in favour of proposal 5 with 65.2 per cent answering yes; 7.6 per cent responded no and 27.2 per cent answered don't know.

42. Respondents were asked to provide free text comments to explain their answer. Of the fifty-four respondents who agreed with the proposal, five respondents explained that they agreed with this proposal as it was a sensible approach, while two cited a decrease in emissions.

Comment – 'Yes'	Frequency of inclusion
Sensible approach	5
Decrease emissions	2
Failure to scrap minimal will lead to taxi shortages	1
Engines getting smaller and more efficient	1
Potentially cost effective for the industry	1
Uttlesford council licensed a Smart car	1
Engine capacity no bearing on power output	1

43. Six of the seven respondents who answered 'No' provided a comment. Two comments provided specific concerns. one respondent stated that the minimum engine requirement should be 1.8 to 2.2 engines. Another cited possible impact on independent drivers due to costs.

Comment – 'No'	Frequency of inclusion
Informed previously that there is no requirement	1
1.8-2.2 engines should be the minimum	1
Change could affect independent drivers due to increased prices	1

Proposal imprecise	1
Engine capacity no bearing on power	1
Should be any size	1

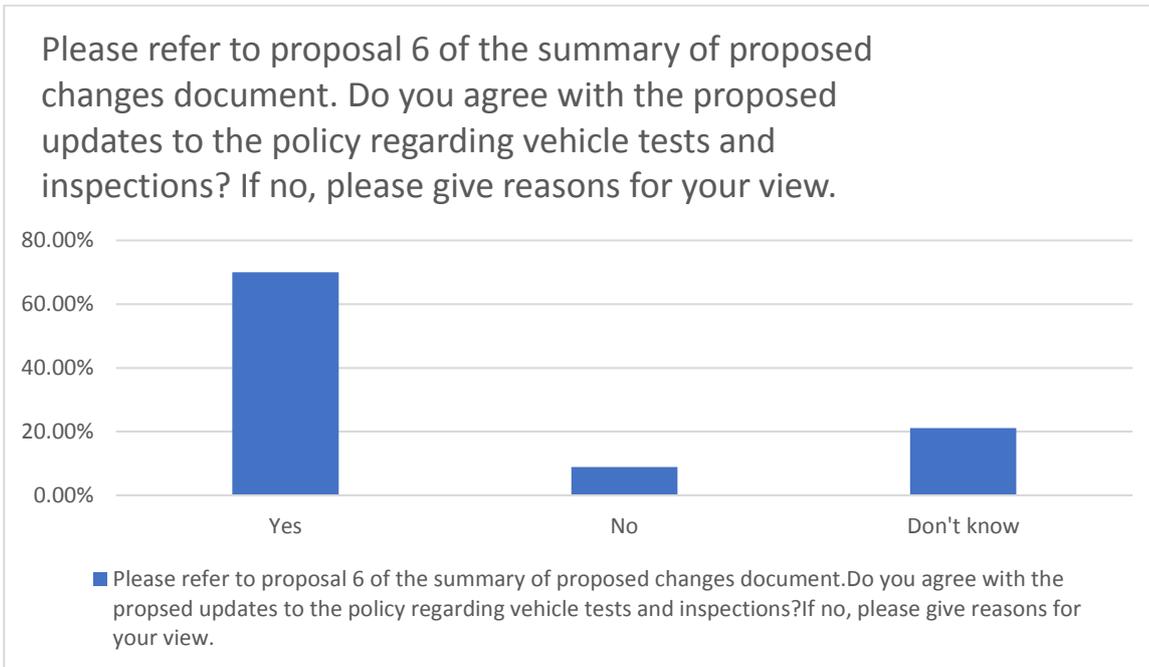
44. Four comments were also provided by respondents who indicated they 'didn't know'. The most frequent comment was that they had insufficient information or knowledge to answer. However, there was also one comment that, despite a lack of knowledge regarding this question, the most important factors should be low emissions and vehicle safety. One respondent stated that electric vehicles were too expensive and that this does not incentivise uptake by drivers.

Comment – 'Don't know'	Frequency of inclusion
Insufficient information or knowledge	3
Emissions should be low and vehicles safe	1
Electric vehicles too expensive	1

Proposal 6 – Question 14

Test and inspection

45. Proposal 6 referred to new test and inspection requirements for private hire and hackney carriages and consultees were asked whether they agreed with this potential change. Of the 90 responses to this question, 70 per cent agreed with the proposal. 8.9 per cent disagreed and 21.1 per cent did not know.



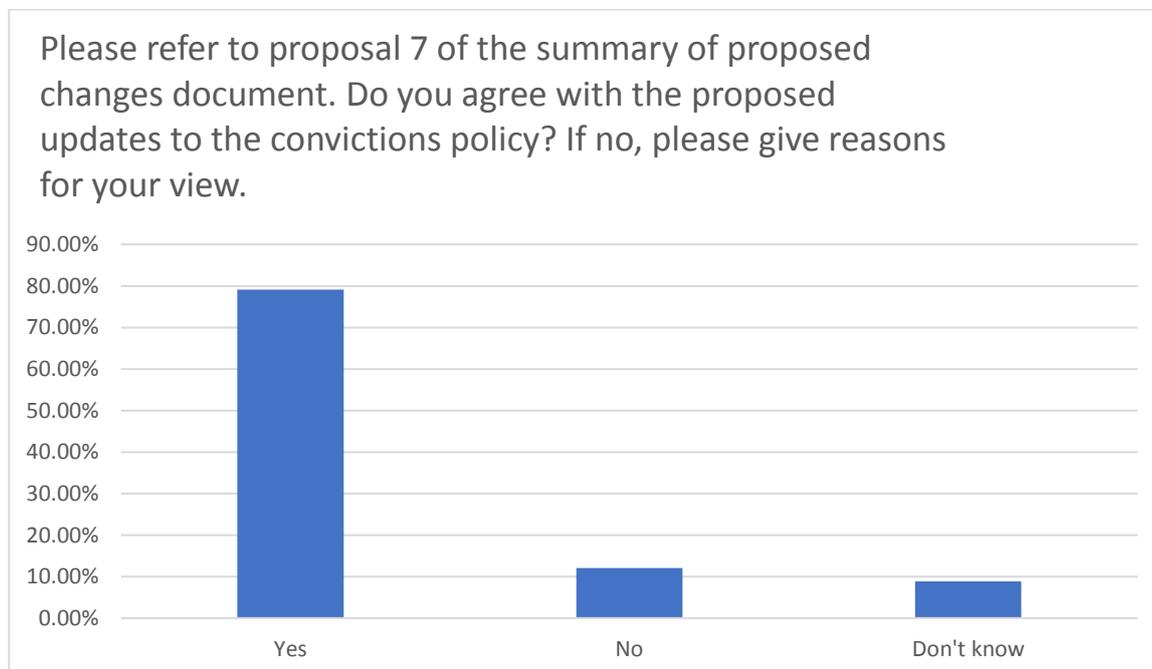
The graph shows a majority answered yes to proposal 6 (70 per cent). 8.9 per cent answered no and 21.1 per cent answered don't know.

- 46. Respondents were asked to provide free text comments to explain their answer. In total, thirteen comments were made for all answers. For respondents that answered 'Yes', two comments indicated that they believed this to be a sensible proposal. Two other respondents cited vehicle safety and that vehicle reliability and standards should be consistent.
- 47. Two respondents that answered 'No' argued that the proposal was not clear. One respondent cited financial constraints. Another respondent stated a preference to use a station and tradesmen that were known to the respondent, rather than a Council mandated station. In a similar vein, another respondent stated a preference for existing systems.
- 48. Three respondents that selected 'Don't know' suggested that they either held insufficient knowledge to answer or that the proposal was incoherent. One such respondent queried if the proposal suggested undertaking MOT and licensing at the same time. One respondent suggested that the proposal was too lax, and the policy should aim to ensure the highest possible standards.

Proposal 7 – Question 15

Convictions

- 49. Proposal 7 referred to a new convictions policy that increased the length of ban for violent and racially aggravated crimes, as well as sex offenses. Of 91 total responses, 79.1 per cent agreed with this proposal. 12.1 per cent disagreed and 8.8 per cent answered 'Don't know'.



The graph shows a majority in favour of proposal 7 with 79.1 per cent answering yes. 12.1 per cent answered no and 8.8 per cent answered don't know.

- 50. The comments provided for respondents who answered both 'Yes' and 'No' follow some similar themes. While there is broad agreement with the spirit of the proposal, all eight comments left by respondents who answered 'No' stated that

they disagreed with the proposal because the bans imposed should either be longer or permanent. Similarly, most respondents who answered 'Yes' to the proposal also favoured a longer or permanent ban. However, three respondents agreed with the length of ban as set out in the proposal.

Comments – Yes and No answers	Frequency of inclusion
Should mean permanent ban	13
Agree with policy as proposed	4
Should mean longer ban	3
Dependent upon circumstances of the crime	3

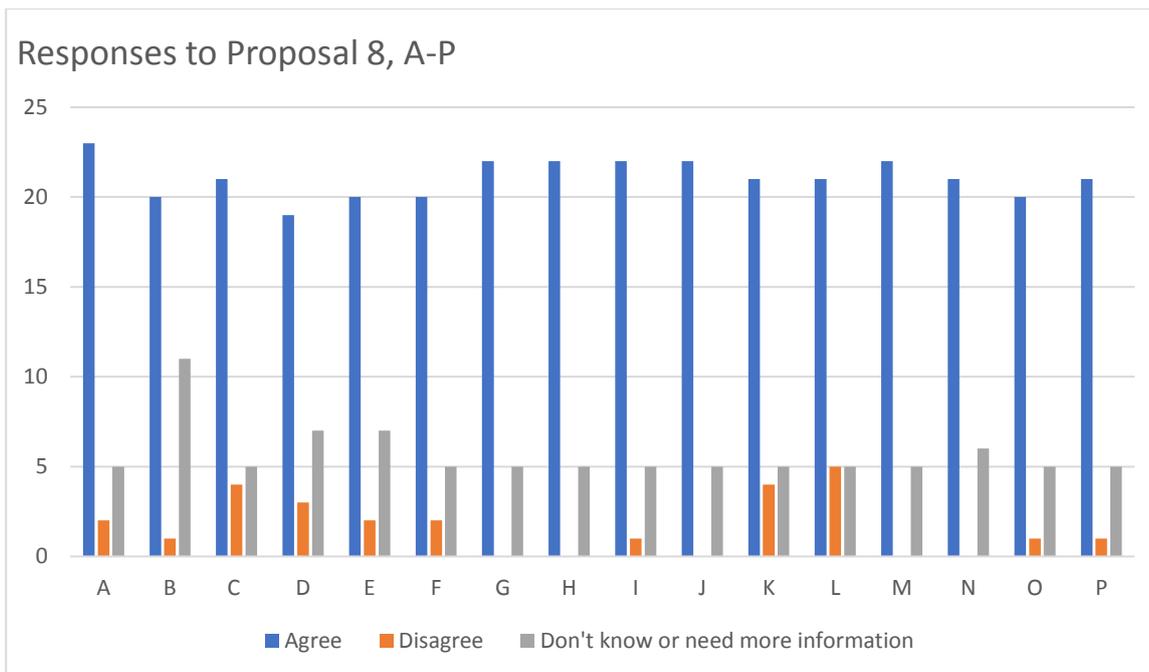
51. Three respondents who answered 'Don't know' provided a comment. Two indicated that they had insufficient knowledge to answer, with one stating that if there was evidence that the current ban length was insufficient then they should be increased as per the proposal.

Comments – Don't know answers	Frequency of inclusion
Insufficient knowledge	2
No comment	1

Proposal 8 – Question 16

Other minor proposals

52. Proposal 8 refers to a series of other minor proposals, designated A to P. Respondents were asked to comment on the proposals as presented. Forty-eight respondents provided comment. Analysis of the comments shows that there is broad agreement for all proposals.



The graph highlights the collection of responses to 16 additional minor proposals. The majority agree with all proposals, with some increased opposition to proposal L, K and C.

53. The proposal that respondents disagreed with most consistently was proposal L, which is a requirement for clear windows. Four respondents disagreed because many new cars come with tinted windows, so there would be a cost involved in making changes. One respondent also indicated that tinted windows prevent larger vehicles from overheating, so provide comfort and safety for driver and passenger. Conversely, two respondents argue that the proposal is irrelevant because DVSA regulations are sufficient and enforced.

Comments – Proposal L	Frequency of inclusion
New cars come with tinted windows	4
DVSA regulations are sufficient	2
Safety issue for larger vehicles	1

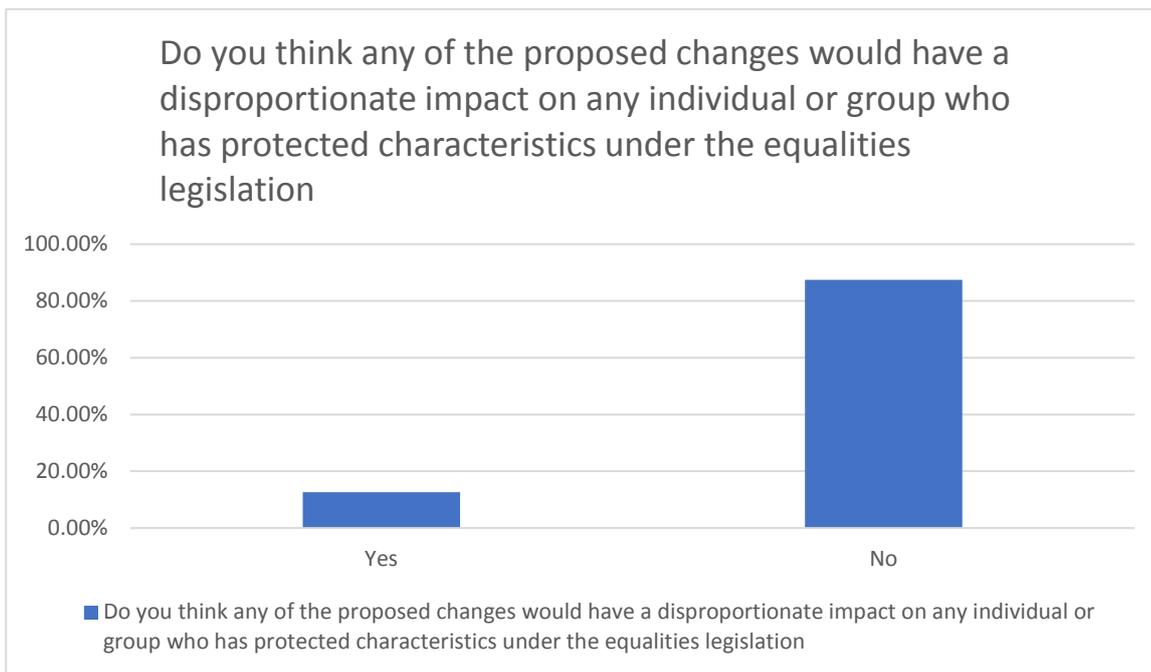
54. Proposal B, a new requirement for licensed drivers to undertake a refresher Safeguarding, Child Sexual Exploitation and Disability Awareness course, incurred the most calls for more information. Most frequently, respondents asked questions about finance. Three respondents specifically asked if West Suffolk Council would finance this proposal, with another asking how much the course would potentially cost drivers.

Comments – Proposal B	Frequency of inclusion
Council paying for it?	3
How much would it cost?	1

Requires consultation with drivers	1
More info required	1
Included in two-day course	1

Equalities impact – Question 17

55. Respondents were asked an additional question around equalities impact. 88.5 per cent of respondents answered that that they did not think the proposals set out by the council disproportionately affected any individual or group. Ten free text comments were added by respondents.



The graph shows that 12.6 per cent of respondents think there is a disproportionate impact on individuals or groups with protected characteristics. 87.4 per cent answered no.

56. Responses to this question can be divided between issues that can be considered under the Equalities Act and other issues. Seven comments explained why respondents considered the proposals discriminatory. Two comments cited age discrimination, but did not explain which age group; one respondent considered workers resident in the UK for under three years to be discriminated against due to increased cost requirements; one respondent considered the proposals discriminatory to people with disabilities, as the proposals will lead to drivers getting cheaper cars to cut costs; one respondent considered the proposals to discriminate against small firms and owner drivers; and another indicated that proposal 7 needed to be reworded.

Comments – equalities legislation	Frequency of inclusion
Age discrimination (unspecified)	2
No discrimination	2

Disabled passengers	1
Gender – some more awareness regarding male and female drivers doing the same job	1

Comments – Other issues raised	Frequency of inclusion
Migrants or EU workers – resident under three years	1
Offenders – all offenses should be judged in context	1
Small or self-owned companies	1
Proposal 7 – wording issues	1