

A total of 20 responses were received from various parties. The responses are summarised below.

1. Turners Hill Parish Council fully supported the proposed amendments
2. The Police were fully supportive of the changes especially in respect of amendments **(H) Overseas Applicants, (I) Fit and Proper test, (J) Safeguarding Awareness Training, and (K) Criminality Checks on Vehicle Proprietors,**
3. WSCC Safeguarding Team were supportive and very keen mandatory safeguarding training taxi drivers to also include training on wider criminal exploitation to include County Lines and Modern Slavery not just CSEA.
4. Guide Dogs sent a comprehensive response to these areas and were supportive of the measures proposed. They did suggest that some areas could potentially be tightened such as ensuring Safeguarding and Disability awareness training is completed in a shorter period than 12 months. I have attached their full consultation reply.
5. Disability Access East Grinstead responded to amendments **(V) Wheelchair Accessible Vehicles and (Y) Mandatory Disability Awareness Training.** They have additionally suggested mandatory minimum standards for wheelchair accessible vehicles. The mandatory requirement for Disability Awareness Training was supported. They suggested that the training includes physical disability, visual impairment and deafness.
6. The Brighton Representative of the GMB Union responded in relation to amendment **(R) Intended Use Policy.** He confirmed that the GMB Union National Organising Committee (Professional Drivers Branch) which now supports the policy for an 'Intended Use Policy' for both hackney carriages and private hire vehicles to try and tackle the abuse of Cross Border Hiring which has diminished local licensing control. I have also attached the draft GMB Policy regarding this for information.

All the other responses were from licensed drivers or private hire operators. Most of the drivers were solely opposed to the implementation of **(X) Licensed Vehicle Emissions.** I have detailed these first.

7. Driver A commented "*while it is absolutely right that we should align with the directives of The European Emissions Standards (currently Euro 6), these directives are upgraded approximately every five years. My hope is that this requirement would only apply to vehicles purchased for use as taxis from 1st October 2022 and not to vehicles purchased in good faith with the current ten year lifespan in mind prior to this date.*"
8. Driver B commented "*I am in agreement with the majority of the drivers in saying that due to current circumstances (pandemic) the new by laws regarding the emissions is not fair I have also purchased a new vehicle on finance which if this was to come into force would leave me unable to work to support my family. Please take this into consideration*"
9. Driver C commented "*Just want to raise my point last whole year of lost because of Covid as my self lots of other driver couldn't work please delays the implementation of new rule regarding euro car / white etc by a year as financially weak wouldn't able to afford 2016 or above car please consider my request*"

10. Driver D commented, *“In regards to drivers having to buy euro 6 cars in 2022, I would like to say that I just recently bought a white car this year and it’s not possible for me to buy another car in a years time. Can that rule be looked at again please.”*
11. Driver E commented *“Does this mean I will have to change my car again?”*
12. Driver F asked if a petition by drivers against the Euro 6 requirement would be permitted by the Council

Other drivers commented on both the Licensed Vehicle emissions together with other proposals

13. Driver G commented, *‘Regarding euro 6 complaint vehicles from 2022, white cars and CCTV installed and safeguarding by our own expense. This proposal is so unhelpful to our business trade that most or if all drivers won’t be able to cover this expense due to covid 19 as business has got even worse, even without covid 19 this is a huge expense that drivers like I won’t be able to afford. Most drivers have already bought new cars and they can’t afford to replace it with white and euro 6 compliant. Most drivers like I that have bought non white taxi is due to that it’s very hard to buy white cars that is in your range and spec that we want.*

Euro 6 vehicles that has been proposed must drivers weren’t aware of this before buying the new car and this isn’t fare as this is a huge amount of money that we are talking about especially in this situation that we are in due to covid 19. We are trying to make a living but business is so bad that we are falling in to debt just to cover the expenses.

I think like all businesses Safeguarding should be provided by that taxi council so will help drivers safe guard customers and children as with working for other companies outside taxi trade they would of provided the same.

CCTV I think should be optional for insurance purposes for those who can afford this, this is still an expense that is quite hard to manage due to the current situation.

These expenses that are proposed in this current situation isn’t right as we are trying to work and make a living and putting this in place is going to make it worse that could like I may drive people out if this trade.

Please help us and I as taxi business trade to withdraw these expenses in this current situation that the world has come to so we as drivers can stay afloat and try to move on by clearing my debts that we’ve incurred from car loans to other financial difficulties.

I and other drivers in this trade that have been trading for long time have seen a very big drop in trade and putting extra expenses won’t help drivers like I to be in business, we should all help each other out to stay in business this will help everyone including MSDC to stay in business with revenue as well

Please consider my and other request that other drivers may email regarding this proposal this will be a great help for all drivers including me.”

14. Driver H made comments regarding most of the proposed areas. Rather than detail all of them I have attached his response to the consultation to this document. However, in respect of Licensed Vehicle Emissions he commented

“This Is Going to be the Biggest Bug Bear for Drivers / Owners and will cause a Hugh Strain on already Stretched Purse Strings. I myself will have to change my car next year anyway as it has fallen into the Current 10 Year Bracket. That is of course if I am still doing this by then? As you know yourself since the first recession struck our

*livelihood has dwindled in ever increasing circles making a living is harder and harder. With costs rising all the time and earnings falling. Drivers are spending longer hours trying to earn the same levels of income that they earned in earlier years! I believe that these new Euro Emissions equate to cars and van registered from 2016 onwards? As you know this will force Drivers to Change Vehicles a lot earlier than they planned for. If they have a car registered between 2012 & 2016 regardless of the current 10 Year ruling in place! This one Ruling from the Council could Force Drivers to leave this Trade in Doves, overnight in fact. Less than 2 years notice is **NOT ENOUGH TIME!** I would Strongly Recommend that this is delayed for **at Least a Further 2 Years** to try and get some semblance back into this Trade. This trade has suffered immensely especially with Covid-19. We rely on People travelling from A to Z and everywhere in between that is not happening in today's World. Business as well as Leisure travel has dwindled to virtually nothing. People have changed their work schedules with many mainly working from home and that wont change anytime soon. As, well as people doing more shopping online and consequently less customers travelling around the District. Which has a direct effect on the Trade!"*

15. Driver I made comments in respect of **(X) Licensed Vehicle Emissions (J) Safeguarding Training (Y) Disability Awareness) and L (Installation of CCTV)**. In summary he stated:

"The proposals have the potential to place a serious financial burden on the trade at a time when business is roughly 70% down pre-Covid. Many drivers, especially jockeys, have given up others especially HAC driver /owners, are supplementing their reduced income by Universal Credit payment and loan holidays on their vehicle finance. These proposals, if implemented would not improve the service MSDC is seeking and most probably would lead to a further reduction in the number of vehicles available to the public.

Overall I agree with the intentions of the proposals but query the time frame and question if any thought has been given to the cost to the trade as a whole and the effect on peoples livelihoods."

16. Driver J made comments in respect of **(R) Intended Use Policy for Hackney Vehicles**

"I hear on the grapevine, that this has been prompted by some of our locally licensed drivers seeking work elsewhere, due to the shortage of fares in our area caused by the Coronavirus situation. If this is the case, whilst I would not condone their behaviour, I can totally understand why it may be happening. Some of our drivers have big fixed expenses which need to be paid. "Desperate times call for desperate means" as they say."

17. Driver K made comments regarding CCTV and additional costs that would be incurred

Regarding the installation of cctv, it needs to be taken into account the fact that the car is being used privately with the family members too. The privacy of the driver and his or her family should be looked at.

At this time with the pandemic and loss of earnings, without the clarity of when we will be getting back to normality, could you please look into delaying any proposals which would incur extra costs for the driver. We have an uncertain future.

Other comments received were:

18. Operator A welcomed the proposals but questioned the need for CCTV in plate exempt vehicles
19. Operator B asked for clarification on door signage for Private Hire Vehicles and the proposed reporting of complaints to the Licensing Team
20. Operator C made comments in several areas. In respect of **(J) Safeguarding Awareness Training**, they asked if the training could be online, in respect of **(O) Operator records**, will result in too much and extraneous administrative work for operators and **(S) Written Off Vehicles** stated *written off vehicles should be requested to obtain a new MOT and/or a taxi fitness test right after their repairs, regardless of the original expiry period of those documents, and only if they pass this test(s) they should be allowed back on the road.*