

APPENDIX B

Register and Summary of Responses to consultation exercise on the Draft revised Hackney Carriage and Private Hire Policy and Conditions (Consultation Period – 1st March 2021 to 2nd May 2021 inclusive)					
Ref.	Respondent	Date Received	Comment(s)	Licensing Authority Appraisal	Licensing Authority Response
TPR1	Kevin Farren Rogate Cars (Licence Holder)	01/03/2021	Paragraph 21.3 (a) Use other garages for MOT and Fitness Tests; (b) Fitness Tests 6 days/ week.	(a) MOTs can already be undertaken at any Driver and Vehicle Standards Agency (DVSA) approved MOT testing station and there is no proposal to change this. Regarding Fitness Test, CCS is independent and verifiable. (b) CCS amenable to the idea subject to volume of work and availability of staff.	(a) No change required to proposed Policy. (b) No change required to proposed Policy.
TPR2	'Sean M' Uber	02/03/2021	(a) Acknowledging receipt of consultation, however no comments at this stage.	(a) Noted.	(a) N/A

<p>TPR3</p>	<p>Kim Mullen Station Taxis (Licence holder)</p>	<p>03/03/2021</p>	<p>Paragraph 20</p> <p>(a) Age limit unfair for newer vehicles.</p>	<p>(a) Due to the ongoing climate emergency, there is an urgent need to reduce emissions, and it is necessary to improve/ reduce emissions arising from Taxi and Private Hire vehicles: The proposed 10 year age limit is one mechanism for achieving this with ongoing pollution-reducing improvements in engine design.</p> <p>An already-planned transitional concession is that all existing vehicles over 4 years old will be eligible for a 5 year extension, irrespective of their current age, this to allow existing Licensed proprietors time to plan for replacing vehicle(s). The proposed 10 year age limit for new Applications is considered fair and balanced, also taking into account such other factors as wear & tear on bodywork & interior trim, as well as ongoing improvements in design & safety.</p>	<p>(a) No change required to proposed Policy.</p>
<p>TPR4</p>	<p>Carole Foster Central Cars (on behalf of Licence holder)</p>	<p>03/03/2021</p>	<p>Paragraph 38</p> <p>(a) Operator staff not public-facing as on phones, so why the requirement for DBS checks?</p>	<p>(a) All Booking & Dispatch staff are public-facing: This is a specific requirement of s.8.7 to 8.12 of the Department for Transport's 'Statutory Taxi & Private Hire Standards' (July 2020)</p>	<p>(a) No change required to proposed Policy.</p>

<p>TPR5</p>	<p>Adrian Arnell (Licence holder)</p>	<p>03/03/2021</p>	<p>(a) Unable to find paragraph in Draft Policy.</p>	<p>(a) The respondent was not looking at the Draft Policy itself: emailed 04/03/2021 with instructions & web link.</p>	<p>(a) N/A</p>
<p>TPR6</p>	<p>John Hoole (Workshop Manager) Chichester Contract Services</p>	<p>04/03/2021</p>	<p>(a) All new applicants should be required to pass an English comprehension test.</p>	<p>(a) Requirement already included within proposed Policy at Paragraph 12. In addition, there is a general and overriding requirement that all licence holders are, and remain, 'fit and proper'.</p>	<p>(a) No change required to proposed Policy.</p>

<p>TPR7</p>	<p>Katy Fletcher (Licence holder)</p>	<p>15/03/2021</p>	<p>Paragraph 14</p> <p>(a) Unfair that an annual medical examination is required for 60+ age group.</p>	<p>(a) The current requirement is that all applicants/ Licensed Drivers must meet the Driver and Vehicle Licensing Agency (DVLA) Group 2 vocational standard. Group 2 is applied by DVLA in respect of individuals it licenses to drive large lorries and buses. To evidence that an individual meets the Group 2 Standard, currently CDC requires a completed D4 Medical Examination report upon initial application, and then every 4 years up until the age of 60, thereafter an annual check. DVLA now requires checks for Group 2 drivers that it licenses every 5 years, and annually from age 65: It is appropriate to align with this. Positively, locally this increased age change should be coupled with an amended Declaration by Medical Practitioner (Form T14) for all Licensed Drivers, enabling the examining Doctor to increase the frequency of checks as they see fit: This will improve public safety in respect of any medical issues in persons of all ages.</p>	<p>(a) Proposed Policy amended at Paragraph 14.</p>
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<p>TPR8</p>	<p>Kevin Farren, Rogate Cars (Licence holder)</p>	<p>17/03/2021</p>	<p>Paragraph 21.3</p> <p>(a) Comment made why 'Taxi Licencing Officer' or 'taxi admin officer' able to overrule trained MOT Testers regarding 'advisories' on an MOT.</p>	<p>(a) Noted, however such decisions are/ would be made by experienced Officers and, where necessary, in conference with qualified MOT Testers. MOT Tests only provide a snapshot report for a particular day: Necessarily, other factors including the extremely high mileage travelled by Licensed Vehicles, safety, comfort, and expectations of the travelling public are all factors considered by Officers.</p>	<p>(a) No change required to proposed Policy.</p>
<p>TPR9</p>	<p>Enzo Caira (Licence holder)</p>	<p>18/03/2021</p>	<p>Paragraph 20</p> <p>(a) Age limit unfair for newer vehicles.</p>	<p>(a) The respondent misread/ misunderstood the age limit proposal, believing that already-Licensed vehicles would be subject to the same criteria as new applications: The already-planned transitional concession is that all existing vehicles over 4 years old will be eligible for a 5 year extension, irrespective of their current age, this to allow existing Licensed proprietors time to plan for replacing vehicle(s). The proposed 10 year age limit for new Applications is considered fair and balanced, also taking into account such other factors as wear & tear on bodywork & interior trim, as well as ongoing improvements in design & safety.</p> <p>[Clarification email sent 18/03/2021]</p>	<p>(a) No change required to proposed Policy.</p>

<p>TPR10</p>	<p>CDC Environmental Protection Team (A.Smith)</p>	<p>22/04/2021</p>	<p>Paragraph 20</p> <p>(a) Reduced fees for lower emitting vehicles;</p>	<p>(a) Licensing Fees are set for cost recovery only, so it is not possible to reduce nor increase them to influence the choice of fuel types of vehicles. However, due to the ongoing climate emergency, there is an urgent need to reduce emissions, and it is necessary to improve/ reduce those arising from Taxi and Private Hire vehicles: The proposed 10 year age limit is one mechanism by which this may be tackled with ongoing pollution-reducing improvements in engine design, together with HM Government's stated intention to cease the sale of petrol & diesel vehicles by 2030. The already-planned transitional concession regarding existing vehicles over 4 years old being eligible for a 5 year extension, is to allow existing Licensed proprietors time to plan for replacing them.</p> <p>The proposed 10 year age limit for new Applications is considered fair and balanced: However to encourage a move towards non-polluting vehicles, pure Electric Vehicles (EV) should be excluded from the age limit proposal, but still be subject to the same robust testing regime as other Licensed vehicles to ensure that aspects such as wear & tear on bodywork & interior trim are monitored, as well as acknowledging ongoing improvements in design & safety, with replacement encouraged as necessary for the safety, comfort, and expectations of the travelling public, together with the public</p>	<p>(a) Proposed Policy amended at Paragraph 20.</p>
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			<p>(b) Install Electric Vehicle (EV) chargers near homes of EV taxi drivers;</p> <p>(c) Hold an EV “try before you buy” day;</p> <p>(d) Look at ways to reduce the capital cost of an EV;</p> <p>(e) Install an EV rapid charger at Chichester rail station taxi rank.</p>	<p>image of CDC as the Licensing Authority.</p> <p>(b) This is a WSCC Highways matter and, as such, not within the scope of the proposed Policy. However, the Licensing Team will be pleased to support and work with the Highways Authority and CDC Departments to achieve this.</p> <p>(c) Noted. Although not a matter of policy, the Licensing Team will be pleased to support and work with other CDC Departments to achieve this.</p> <p>(d) Noted. Although not a matter of policy, the Licensing Team will be pleased to support and work with other CDC Departments to achieve this.</p> <p>(e) The railway station is privately owned and operated by Govia Thameslink. As such it is not within the scope of the proposed Policy. However, the Licensing Team will be pleased to support and work with the landowner and any other interested parties.</p>	<p>(b) No change required to proposed Policy.</p> <p>(c) No change required to proposed Policy</p> <p>(d) No change required to proposed Policy.</p> <p>(e) No change required to proposed Policy.</p>
TPR11	Owen Watkins (Licence holder)	29/04/2021	<p>Paragraph 20</p> <p>(a) Cost of new vehicles is prohibitive.</p>	<p>(a) Due to the ongoing climate emergency, there is an urgent need to reduce emissions, and it is appropriate to improve/ reduce emissions arising from Taxi and Private Hire vehicles: The proposed 10 year age limit is one mechanism for tackling this with ongoing pollution-reducing improvements in engine design. The already-planned transitional</p>	<p>(a) No change required to proposed Policy.</p>

			<p>(b) Age only limit unfair: Should take into account engine improvements, EV, and LPG conversions giving longer age limit.</p>	<p>concession is that all existing vehicles over 4 years old will be eligible for a 5 year extension, irrespective of their current age,; this to allow existing Licensed proprietors time to plan for replacing their vehicle(s).</p> <p>(b) However to encourage a move towards non-polluting vehicles, pure Electric Vehicles (EV) should be excluded from the age limit proposal, but still be subject to the same robust testing regime as other Licensed vehicles to ensure that aspects such as wear & tear on bodywork & interior trim are monitored, as well as acknowledging ongoing improvements in design & safety, with replacement encouraged as necessary for the safety, comfort, and expectations of the travelling public.</p> <p>The emissions benefits of LPG-fuelled vehicles are debateable. Whilst LPG may in general produce significantly less particle and Nitrogen Dioxide (NO₂), the condition and age of the engine that has been converted will have an impact on the amount of unburnt fraction which is still emitted from the vehicle. In addition, conversions to an LPG system makes a car heavier which may make the car less efficient from a carbon perspective. It is felt appropriate to encourage EV rather than LPG conversions.</p>	<p>(b) Proposed Policy amended at Paragraph 20.</p>
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<p>TPR12</p>	<p>Farshad Ahmadian (Licence holder)</p>	<p>02/05/2021</p>	<p>Paragraph 20</p> <p>(a) Age only limit unfair:</p> <p>(b) Immediately should introduce higher Euro Standards;</p> <p>(c) higher standards in the testing regime;</p> <p>(d) introduce spot tests/ 'secret shopper' testing.</p>	<p>(a) Due to the ongoing climate emergency, there is an urgent need to reduce emissions, and it is appropriate to improve/ reduce emissions arising from Taxi and Private Hire vehicles: The proposed 10 year age limit is one mechanism for tackling this with ongoing pollution-reducing improvements in engine design. Further, it considers other factors such as wear & tear on bodywork & interior trim, as well as acknowledging ongoing improvements in design & safety, with replacement encouraged as necessary for the safety, comfort, and expectations of the travelling public.</p> <p>(b) Updated 'rolling' Euro (or any replacement standard) requirements are already included within the proposed Policy at Section 21;</p> <p>(c) An updated testing regime is already included within the proposed Policy at Section 21;</p> <p>(d) Multi-Agency spot checks & 'secret shopper' operations are expected to be reintroduced after COVID-19 restrictions are lifted.</p>	<p>(a) No change required to proposed Policy.</p> <p>(b) No change required to proposed Policy.</p> <p>(c) No change required to proposed Policy.</p> <p>(d) No change required to proposed Policy.</p>
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<p>TPR13</p>	<p>J.Rendall (Licence holder)</p>	<p>02/05/2021</p>	<p>Paragraph 20</p> <p>(a) Age only limit unfair: Should take into account EV & LPG conversions with longer age limit;</p>	<p>(a) Due to the ongoing climate emergency, there is an urgent need to reduce emissions, and it is appropriate to improve/ reduce emissions arising from Taxi and Private Hire vehicles: The proposed 10 year age limit for new Applications is considered fair and balanced, with all existing Licensed Vehicles benefitting from a 5 year extension irrespective of their current age: However to encourage a move towards non-polluting vehicles, pure Electric Vehicles (EV) should be excluded from the age limit proposal, but still be subject to the same robust testing regime as other Licensed vehicles to ensure that aspects such as wear & tear on bodywork & interior trim are monitored, as well as acknowledging ongoing improvements in design & safety, with replacement encouraged as necessary for the safety, comfort, and expectations of the travelling public.</p> <p>The emissions benefits of LPG-fuelled vehicles are debateable. Whilst LPG may in general produce significantly less particle and Nitrogen Dioxide (NO₂), the condition and age of the engine that has been converted will have an impact on the amount of unburnt fraction which is still emitted from the vehicle. In addition, conversions to an LPG system makes a car heavier which may make the car less efficient from a carbon perspective. It is felt appropriate to encourage EV rather than LPG conversions.</p>	<p>(a) Proposed Policy amended at Paragraph 20.</p>
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			<p>(b) Age limit potentially detrimental to the accessibility of Wheelchair Accessible Vehicles (WAVs)</p>	<p>(b) Currently there are 6 PHVs & 35 HCVs providing WAV capability in Chichester District Council's Licensed fleet: Should the number of Hackney Carriages reduce, it is reasonable to expect that market forces/ entrepreneurial acumen will correspondingly increase the number of Private Hire WAVs.</p> <p>The number of Hackney Carriage Vehicles has naturally been decreasing over recent years, this due to technological advances in booking systems, particularly App-based solutions provided by Private Hire Operators.</p>	<p>(b) No change required to proposed Policy.</p>
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