

Appendix C

After reading your latest proposals for next year bringing in new rules and regulations, we strongly disagree to your actions. Instead you should try enforcing the rules you have already applied. In the early days of licensing, officers made regular checks on vehicles and drivers on the streets doing random checks, we can't remember the last time this happened.

We feel that if you go ahead with your plans a certain percentage of drivers and vehicles will disappear leaving a shortage of supply to members of the public within Saffron Walden who already struggle to get transport.

The Private Hire trade is working long hours for little reward and this added burden will drive away experienced drivers as well as deterring new drivers from applying. We have also been advised that you are going to limit drivers hours another burden should this go ahead and the expense that this will create.

What complaints have you had from the public to warrant these new proposals. The town is always growing in size and you should be trying to help to increase the Private Hire trade to supply more drivers and vehicles to meet the demand.

We also notice that you are going to reduce the age limit on Private Hire and Hackney vehicles which transport the members of the public to 10 years, but still hold onto the 20 year limit to normal unmodified vehicles which transport vulnerable school children.

If you do go ahead are you prepared to supply and fund drivers and vehicles, the losers in this will be the elderly and the disabled who desperately need transport to get around.

RESPONSE:

Thank you for your comments in regards to the proposed changes to UDC taxi policies.

We appreciate your point regarding the matter of enforcement. Due to the disproportionately high number of vehicles and drivers licensed with UDC providing the type of proactive enforcement you describe is currently difficult. You will be aware that not all of the costs of enforcement are recoverable through licence fees and this again causes further issues and we have to be more reactive by dealing with complaints, drivers getting convictions, failure to produce documents and a high volume of new applications. UDC hopes to redress the balance between proactive and reactive enforcement work in the future and the proposed policy changes are the first step in this direction. By ensuring high standards and compliance amongst new entrants to the trade it will allow enforcement to concentrate on dealing with the small percentage of cases that require action.

UDC licences a large number of private hire vehicles and drivers and it is possible that some may choose not to continue to be licensed. However it is not envisaged that this will have the impact on the travelling public to which you allude. At least 80% of the licensed vehicles already meet the emissions standards which will not come into effect for vehicle renewals until 2021 giving vehicle proprietors time to plan for the change. With the age part of the policy being removed following discussions with the trade this will allow people that will need a new vehicle to purchase a used car rather than having to go to the expense of purchasing a brand new car. Similarly the cost of an LPG conversion to meet the proposed emissions standards would be recouped more quickly the higher the mileage a vehicle does and vehicle proprietors may choose this as another option.

It is very unfortunate if parts of the trade are working long hours for little reward but this is more a matter for market forces rather than something that can be addressed by policy. The primary

function of the taxi licensing regime is to ensure the safety of the public and every proposal has this at its core.

UDC has made no proposal for a mandatory limitation to drivers working hours as this would require a change in the primary legislation. However, UDC would like to remind drivers of the risks of working overly long hours and not taking regular breaks.

Changes in policy are driven by the duty imposed on this authority to ensure public safety. If an authority simply waited for complaints to drive change then they are likely to end up in a similar situation as other authorities in the country such as Rotherham. Reacting to issues rather than proactively driving positive change can have drastic consequences for all involved.

We appreciate that the population within the District is growing but again the number of vehicles that supply that increased need is largely a matter for market forces. This authority cannot have standards that it believes do not ensure public safety in an attempt to ensure the ready availability of private hire vehicles.

With regards to the age of vehicles the proposal is for the differentiation between schools vehicles and other PHV vehicles to be removed. The authority agrees with your point that the standards for vehicles carrying school children, some of which are vulnerable, should be as high as any other type of vehicle.

The majority of the proposals will apply to new vehicles and drivers entering the trade with some increase in standards for currently licensed drivers and vehicles. It is not our intention to drive away existing drivers or the right type of new applicant but to ensure that we carry out due diligence in our duty to protect public safety.