



## Harlow Council

# Public Consultation on Licensing Standards for Private Hire and Hackney Carriage Vehicles Results (Summary)

## Background

There are approximately 240 private hire drivers and 68 hackney carriage drivers operating in Harlow serving a population of over 85,000 residents.

The Licensing Team has consulted the public and taxi/private hire trades on proposals to modify and replace conditions attached to vehicle licences.

The survey was available online hosted on SurveyMonkey® between 16<sup>th</sup> January 2017 and 5<sup>th</sup> March 2017. The Council has also accepted representations made by email and letters.

## Summary

Results relates to BOTH Hackney Carriages and Private Hire Vehicles

- Just under half of respondents (42%) agree that the council should make it a condition that licensed vehicles should meet a European Standard to improve air quality.
- Of those respondents that agreed with vehicles meeting a European Standard, 45% support the adoption of Euro 4.
- Almost 40% of respondents oppose a move over the longer term to hybrid or zero emission vehicles.
- Over 80% of respondents oppose a condition to limit the use of dark factory fitted rear tinted windows. Respondents that agreed with limiting tinted glass were overwhelmingly in favour of 0% tint.
- Just over half of respondents oppose a condition to prohibit Category C insurance write-off vehicles from being licensed.
- A majority of respondents support the adoption of the legal tyre tread standard.
- Over a half of respondents (53% per cent) consider the proposed standards for dents, scratches and other defects are to be about right.

## Private Hire Vehicles

- A majority of respondents 77% oppose the licensing of one passenger vehicles.
- 43% of respondents support the proposed vehicle inspection frequency

- A majority of respondents (72%) oppose permanently fixed door identification panels.
- A majority of respondents (51%) support an exemption to display council identification plates on executive/chauffeur vehicles.

### Results relates Hackney Carriages

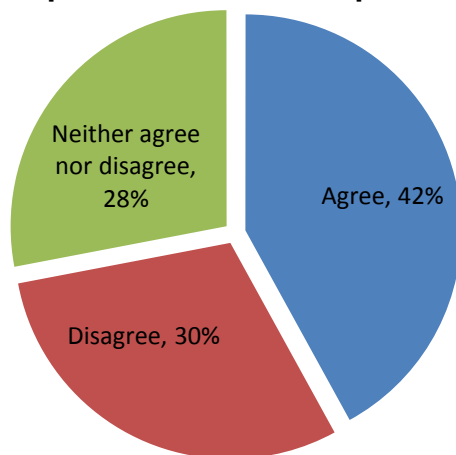
- More than half of respondents (57%) support a condition that new entrants should be required to purchase a new vehicle.
- A majority of respondents support a limit on the number of Hackney Carriage licenses.
- Most respondents support the testing of hackney carriages at more frequent intervals that currently undertaken.

### Response Rate

	Response (%)	Response Count
Hackney carriage driver	16%	9
Private hire driver	66%	37
Private hire operator	5%	3
Person associated with taxi or private hire trade	9%	5
Member of the public and not associated with the trade	13%	7
Representative of a community group	7%	4

Results relates to BOTH Hackney Carriages and Private Hire Vehicles

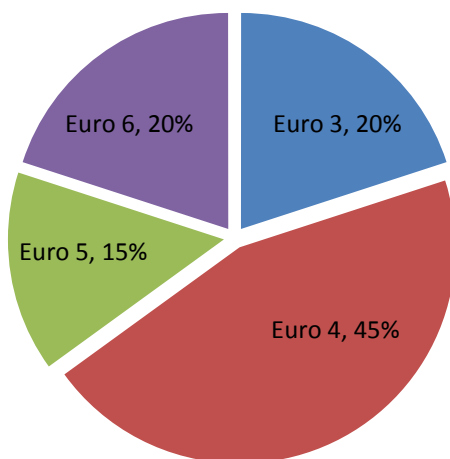
**Do you agree or disagree that the Council should make it a condition that licensed vehicles meet a specified European Standard to improve air quality?**



	Response (%)	Response Count
Agree	42%	22
Disagree	30%	16
Neither agree nor disagree	28%	15

**If you agree that the Council should require licensed vehicles to meet a designed European Standard, what do you think that the Council should adopt?**

Those agreed to the Council should make it a condition that licensed vehicles meet specified European Standard to improve air quality, almost half of the respondents stated Euro 4 standard.

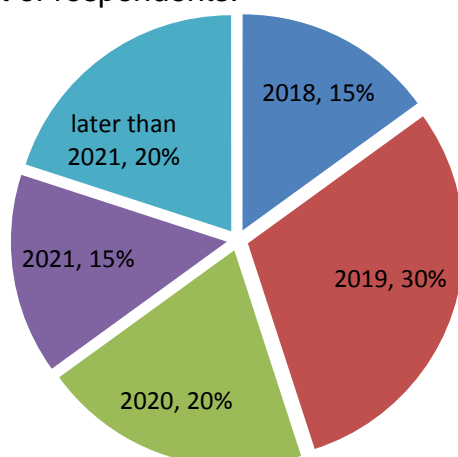


	Response (%)	Response Count
Euro 3	20%	4
Euro 4	45%	9
Euro 5	15%	3
Euro 6	20%	4

## Results relates to BOTH Hackney Carriages and Private Hire Vehicles

### **When should the new revised standard be introduced?**

Those who elected an European Standard, the most popular choice for it to be put in place is in the 2019 with 30 per cent of respondents.



	Response (%)	Response Count
2018	15%	3
2019	30%	6
2020	20%	4
2021	15%	3
later than 2021	20%	4

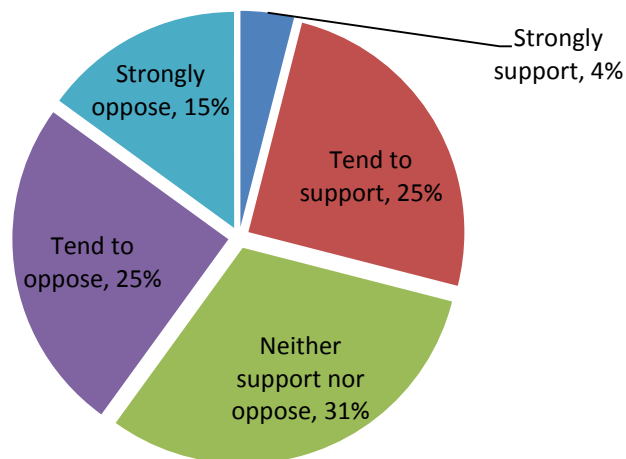
From those respondents who elected Euro 3, half of the respondents preferred it to be introduced in 2021. This standard currently exists (Euro 3).

Respondents who elected Euro 4, forty-four per cent stated to be introduced in 2020.

Respondents who elected Euro 5 or 6, show that more than half stated it should be adopted in 2019 with 67 per cent and 50 per cent respectively.

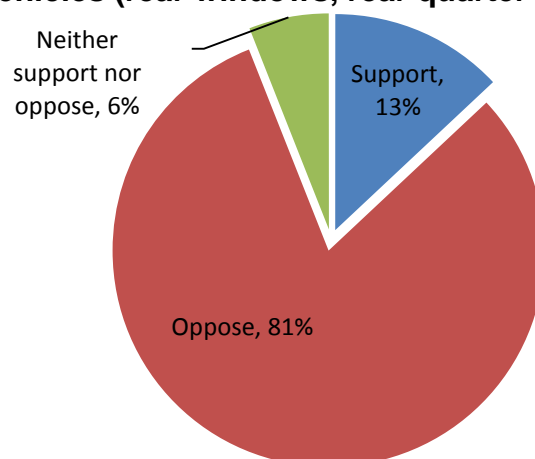
Results relates to BOTH Hackney Carriages and Private Hire Vehicles

**Over the longer term, would you support or oppose measures to encourage vehicle owners to move from diesel vehicles to hybrid and zero emission vehicles?**



	Response (%)	Response Count
Strongly support	4%	2
Tend to support	25%	12
Neither support nor oppose	31%	15
Tend to oppose	25%	12
Strongly oppose	15%	7

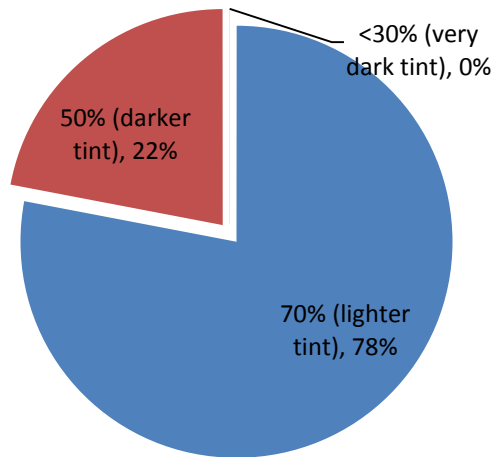
**Do you support or oppose a condition which limits the use of dark tinted windows in the rear of licensed vehicles (rear windows, rear quarter lights and rear tailgate)?**



	Response (%)	Response Count
Support	13%	6
Oppose	81%	39
Neither support nor oppose	6%	3

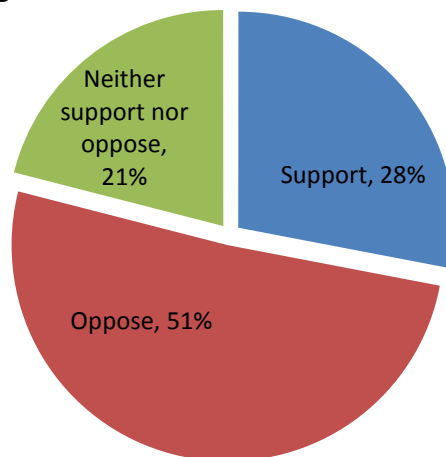
Results relates to BOTH Hackney Carriages and Private Hire Vehicles

**What percentage light transmission (tint) should the Council allow to be fitted to the rear windows?**



	Response (%)	Response Count
70% (lighter tint)	78%	7
50% (darker tint)	22%	2
<30% (very dark tint)	0%	0

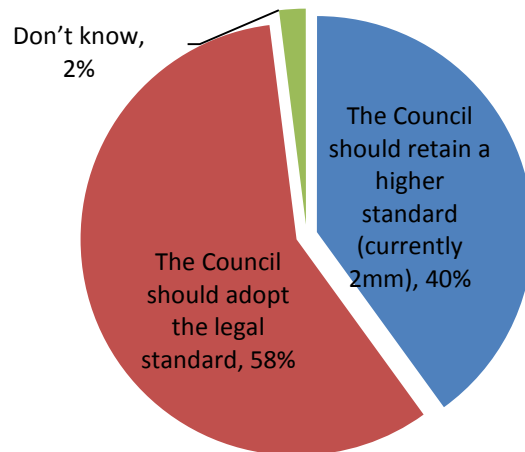
**Do you support or oppose a new condition which prohibits Category C insurance write-off vehicles from being licensed?**



	Response (%)	Response Count
Support	28%	12
Oppose	51%	22
Neither support nor oppose	21%	9

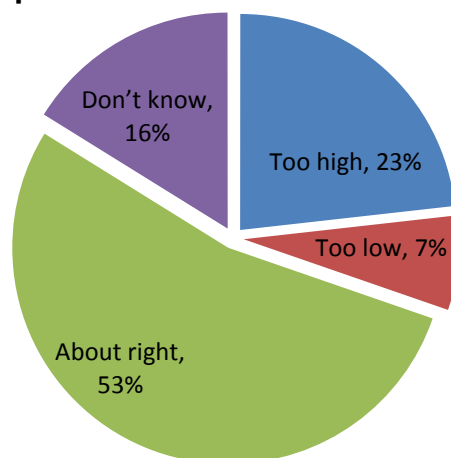
Results relates to BOTH Hackney Carriages and Private Hire Vehicles

**Should the Council have a higher standard for vehicle tyre tread or rely on the legal minimum tread?**



	Response (%)	Response Count
The Council should retain a higher standard (currently 2mm)	40%	17
The Council should adopt the legal standard	58%	25
Don't know	2%	1

**Do you consider that the proposed standards are:**

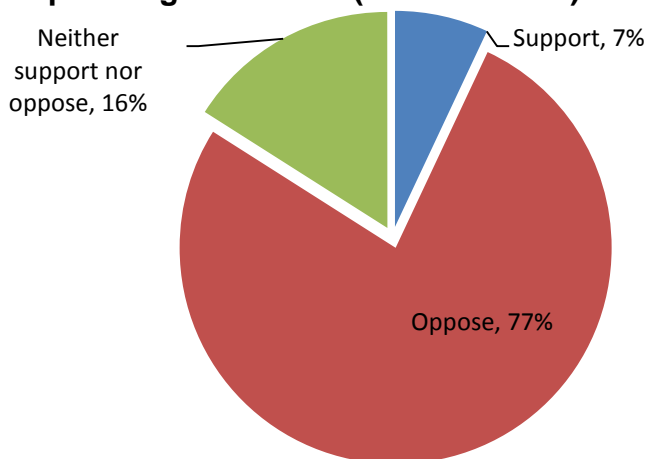


	Response (%)	Response Count
Too high	23%	10
Too low	7%	3
About right	53%	23
Don't know	16%	7



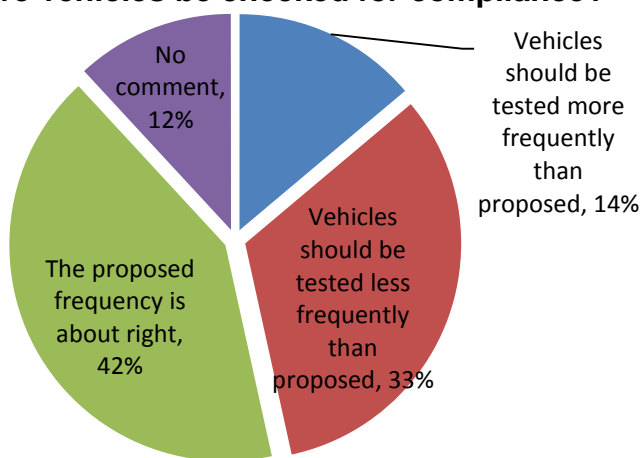
Results relates to Private Hire Vehicles

**Do you support or oppose the introduction of new conditions which would allow the Council to license 1 passenger vehicles (i.e. Smart Car)?**



	Response (%)	Response Count
Support	7%	3
Oppose	77%	33
Neither support nor oppose	16%	7

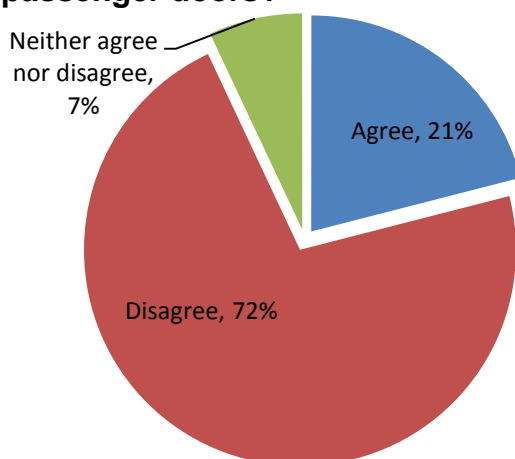
**How often should private hire vehicles be checked for compliance?**



	Response (%)	Response Count
Vehicles should be tested more frequently than proposed	14%	6
Vehicles should be tested less frequently than proposed	33%	14
The proposed frequency is about right	42%	18
No comment	12%	5

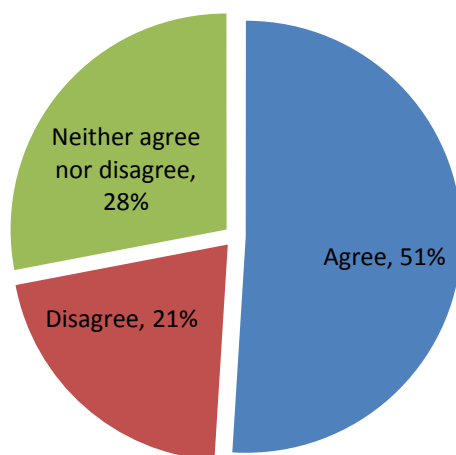
Results relates to Private Hire Vehicles

**Do you agree or disagree that the Council should continue making Private Hire Vehicles permanently display Council identification panels with their licence number on the front driver and passenger doors?**



	Response (%)	Response Count
Agree	21%	9
Disagree	72%	31
Neither agree nor disagree	7%	3

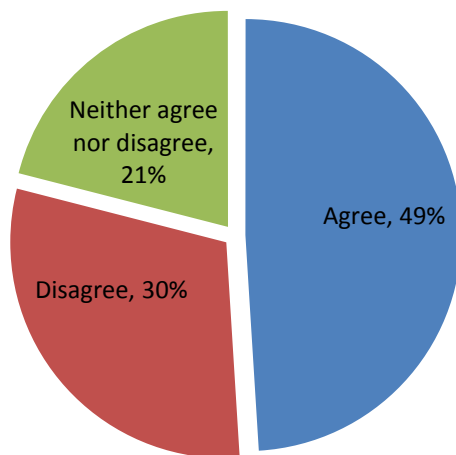
**Do you agree or disagree that genuine executive/chauffeur vehicles should be exempt from an obligation to display a Council rear identification plate and front door panels?**



	Response (%)	Response Count
Agree	51%	22
Disagree	21%	9
Neither agree nor disagree	28%	12

Results relates to Private Hire Vehicles

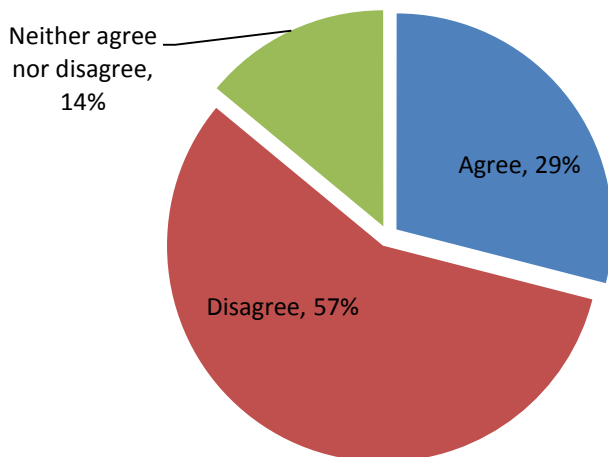
**Do you agree or disagree the Council should check and approve taximeters when fitted to private hire vehicles?**



	Response (%)	Response Count
Agree	49%	21
Disagree	30%	13
Neither agree nor disagree	21%	9

Results relates to Hackney Carriages

**Do you agree or disagree the Council should require the applicant for new vehicle licence to buy a brand new vehicle?**



	Response (%)	Response Count
Agree	29%	12
Disagree	57%	24
Neither agree nor disagree	14%	6

**If you agree, please state your reasons**

This condition prevents an influx of cheap hackney carriages which would drive down the standards

Should be on the condition of the vehicle not its age

The system works as it is

Raise Standards

Keeps them clean tidy and smart.

As Black Taxi's tend to sit at ranks, in the winter most tend to have the engines running, polluting the air. Newer taxi-lower Pollution.

Please refer to Views Given at the end

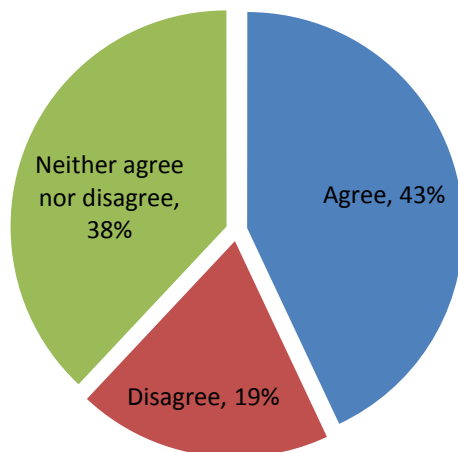
I am unable to answer this as the question only allows 160 characters but there are many valid reasons.

Is not enough work in Harlow and the ranks are not big enough as it is now

There are already too many taxis and not enough work so why even allow more licences to be available?

Results relates to Hackney Carriages

**Do you agree or disagree the Council should limit the number of Hackney Carriage vehicle licenses it will issue?**



	Response (%)	Response Count
Agree	43%	18
Disagree	19%	8
Neither agree nor disagree	38%	16

**If you agree, please state your reasons**

The council should make all private hire change over to Hackney carriage so they can stop the influx of drivers from other areas .

Flooding the market

Too many licensed vehicles already and not enough demand.

Council should also limit the amount of private hire licenses issued.

I have ticked Agree as I believe it is more important to limit the number of ABC & METRO CABS (private hire!) as there are far to many now.

To many sitting at the play house and station blocking the road and on Double Yellow Lines

The Most Important Cap Should Be To Private Hire Cars

Too many already

Please refer to Views Given at the end

I am unable to answer this as the question only allows 160 characters but there are many valid reasons.

As I stated in the last question

There is no unmet demand and not enough work to go round, so limiting the numbers will protect the meagre livelihoods of existing drivers.

Because DT says so and he is never wrong

Mandatory Orders unless the council pay for an unmet demand survey

Results relates to Hackney Carriages

**At what interval should Hackney Carriages be compliance tested?**

	<b>Response (%)</b>	<b>Response Count</b>
Once a year only	21%	9
Twice each year when the vehicle age exceeds 5 years	36%	15
Twice each year when the vehicle age exceeds 6 years	5%	2
Twice each year when the vehicle age exceeds 7 years	7%	3
Twice each year when the vehicle age exceeds 8 years	0%	0
Twice each year when the vehicle age exceeds 9 years	0%	0
Twice each year when the vehicle age exceeds 10 years	14%	6
Twice each year when the vehicle age exceeds 11 years	0%	0
Twice each year when the vehicle age exceeds 12 years	10%	4
Twice each year when the vehicle age exceeds 13 years	0%	0
Twice each year when the vehicle age exceeds 14 years	2%	1
Twice each year when the vehicle age exceeds 15 years	5%	2

**To help the Council to understand your comments, please state;**

- a. the matter or condition to which you refer
- b. how the condition may be improved or altered and
- c. the reasons why you consider that condition is not acceptable or ought to be changed.

Q3. Of course I agree that the Council should meet a specified standard to improve air quality, but to propose that 350 vehicles complying to an increased specified standard would make a difference to air quality sounds highly unlikely. I might be persuaded to agree if the council could quantify the difference moving up a standard, and quantify the expense of doing so for the PH and HC trade. I quote from your own proposal " there are currently no identified breaches of health-based national air quality

standards in Harlow ". The question is phrased in such a way as to be impossible to answer yay or nay

Q4. Once again I agree with this proposal on the basis that this would indeed improve the air pollution problems inherent in using diesel or petrol fuelled vehicles. However I don't understand why the council haven't been consistent in the way they allow the question to be answered. Why "strongly agree/disagree"? Is that just a way of emphasising the councils' view in the councils' favour? Also cost implications should be outlined before agreement to this proposal sought.

Q5. I quote from the site [www.gov.uk](http://www.gov.uk):

"The front windscreen must let at least 75% of light through and the front side windows must let at least 70% of light through."

"There are no rules for tinting the rear windscreen or rear passenger windows."

"Tinted windows are not part of the MOT test."

I would ask the Council why they are seeking to impose a condition that is not the law of the land, which would cost drivers thousands of pounds to comply with. I refer you to others in comments from the PH trade for other considerations in this matter.

Q6. Why again are the Council wasting precious resources by trying to impose a condition that goes against current legislation. If the government with all their resources judge that Cat C vehicles are ok to re-use as long as they conform to the legislation of the day, what expert knowledge can the Council introduce to legitimise this proposal.

Q7. This is one of the few proposals I agree with, as I think it is justifiable based on the very high mileage incurred by PH drivers.

Q8. I can't really work out what question is being asked here. I quote from your own proposal:

" The Council currently has a range of conditions regarding scratches, dents and rust. These conditions are designed to ensure that the vehicle appears presentable for use as a private hire vehicle or taxi " So if you wish to amend them to " improve them", your current condition must have been seriously flawed in the first place.

Q9. PH trade have not raised prices for at least six years. We are all struggling to make a living. The Council justifies this proposal for 1 passenger cars in terms of passenger service and cheaper prices. I cant see that stuffing my 6' 2", 15 stone frame, together with a suitcase, into a smart car, is a better experience than sitting in a 5 seater car on my own on the way to the station or airport. I dont believe the business model of having one passenger a journey at a lower price is sustainable in the long run. Yet in a previous question you emphasis wanting to improve the quality of PH vehicles.

Q11. and Q12. I dont disagree with having door signs, but I do disagree with having them permanently fixed, so once again I cant provide an answer that reflects my views, because of the way it has been phrased. As for chauffeured cars the Council cant have it both ways. You quote that they also come under PH legislation, so they should be subject to the same conditions as all PH vehicles under the councils control. How would the public know they are genuinely licensed vehicles at first glance?

Q13. The Council would be wasting resources and time following this particular proposal. Meters are largely an irrelevance. Please chase the over-chargers, instead, as the operators dont.

Q14. and Q15. Unfair to HC trade in both cases.

Question 16 requires an answer but I am not in a position to comment on this. There was no "I do not have a view on this" option, which is what I would have selected, so please ignore my answer to this question.

why bring in stronger regulation, for Harlow drivers when other councils are different, the whole thing needs to be universal throughout the country, an English speaking test should be bought into the requirements of being either a private hire or hackney carriage driver, stricter knowledge test as well.

I don't understand why tinting on rear windows is being considered. if the tints pass the MOT then that should be sufficient.

Paint chips should also be included as per scratches. (at Martony's I was told my vehicle would be failed as I had a small chip approx. 8mm square in my top coat of paint, even though this is not mentioned in the conditions.)

I don't believe that the age or mileage should be a consideration, but the condition of the vehicle. My vehicle may be considered older but it is kept in good condition. As it is my lively hood.

Q3. Emissions. PH and HC vehicles represent such a small proportion of traffic in the town that the difference would be unmeasurable. Our vehicles are already reasonably environmentally friendly unlike the geriatric busses in town. Could the council confirm that that HTS vehicles will also be required to meet any changes introduced.

Q4. Hybrid Vehicles. The question asks if I support measures to discourage a move to these vehicles without explaining what this would involve making it impossible to answer.

Q5 Tinted Windows. I have outlined my opposition in a separate email which I would like incorporated into my response please

Q6 Cat C Write Offs. With the high costs of body repairs and parts a Cat C write the off could be privately repaired using pre owned body parts to an equal standard for a fraction of the cost without any detriment to quality.



Q8. Vehicle Standards. I believe that we already have high standards for vehicle appearance

Q9. Single Passenger Vehicles. To licence these vehicles would simply lower the standards that the public enjoy. It is also only the expensive Brabus (Sport version) of the Smart Car that meets the councils BHP requirements

Q11. Door Panels. Although I agree to the use of panels I disagree that they should be permanently fixed. PH drivers often use their vehicles for other things than work

Q13. Meters. Although I have no objections to taxi meters being tested it is irrelevant as a driver can simply move to a GPS based meter which are available as apps on phones and used by Metro Cars and ABC and are out of the control of the council.

The council have never bothered to inspect meters in my 20 years of PH driving until a certain operator complained because he is against drivers using their own equipment

Q14 Hackney Carriage Testing. I believe that HC vehicles should be subject to the same mileage testing conditions as PH vehicles but this isn't in the drop down menu

I WOULD ALSO LIKE YOU TO NOTE THAT I FIND THE WORDING OF THE SURVEY VERY WEIGHTED TO GET THE ANSWERS THAT THE LICENSING DEPARTMENT REQUIRE.

I feel the emissions proposal is singling out the taxi trade as being a much larger issue than it is, we have buses in this town emitting huge amounts of visible emissions, during busy periods we have vehicles queuing to enter and exit car parks, yet the proposal will only affect vehicles which drop off and pick up spending minimal time in the a area idling,

I think the current rules on tyres and compliance testing are adequate , the tinted windows issue is very limiting on our choice of vehicle,

PLEASE READ & TAKE NOTE

A.

Tinted Glass

B&C.

We use chauffeur cars or Minibuses a lot and if the private glass was removed then we would have to book with another council so we continue to receive our privacy. This would hit the pockets of those Drivers Licenced By Harlow Council and in time the Council as those Chauffeurs will licence elsewhere.

**Chauffeur Vehicles & Private Hire Minibus's MUST BE EXEMPTED**

I use CAB's every day and it is re ridiculous that drivers should hath to change their class if tinted when it is standard from manufacture. I see no safety reason as stated by the council and have never heard of an accident caused by tinted glass.

When I have finished a day's work I order a cab with blacked out windows so I can relax on my way home knowing it is private

My Biggest complaint it the amount of licences you are handing out (private Hire), There needs to be a cap and very fast.

The council is flooding the town with cabs. It will kill the trade in the end.

The cost to remove tinted windows doesn't affect picking up dropping off customers.

If a vehicle has a minor defect that doesn't affect health and safety should be given 24 hours to sort it.

Tread on tyres should be lowered to national standard as this is legal limit .

My only concern with the proposed changes is with the TINTED GLASS. I do not understand or agree that changing the tint would make it any safer for customers or drivers.

I have done some research into reported crimes or incidents and through the freedom of information act I was unable to find A SINGLE reported incident/crime from all police forces contributed by vehicles having tinted glass. Just to help you understand the amount of crimes reported, the metropolitan police force alone have over 1 million reports every year.

I have not found any evidence of this affecting safety, if anything, the opposite - from some reports - it's believed to have lowered car crime, such as car brake-in's. I also found It to have other benefits such as protecting children and Adults by reducing Sunburn through the tinted glass as it offers up to 99% UV protection and reduces the heat entering the car by up to 46%. This puts less strain on the Air Conditioning unit and therefore fuel Cost & pollution. As PHV can be sitting around between jobs the tint enables the vehicle to cool rapidly, even when the outside temperature is high.

Blocking up to 99% UV ray will not just protect against skin burning, it protects against SKIN CANCER and skin aging.

From manufacturers research I found that tinting glass was not just for privacy, additionally the combination of UV and Solar heat can cause the interior upholstery to fade and plastics (interior door panels etc) to deteriorate and crack. This will affect the car life line, value and its condition.

As you can see, I have spent a lot of time and effort researching this matter, trying and understand the safety aspects but it is clear to me the vehicles safety has already been researched and implemented for a reason by the manufacturers.

I would only agree that the tinted windows should be allowed, when it standard for the glass to be tinted by the manufactures and at time of compliance the glass tint level is the same as the day it drove off the production line.

I would also recommend that the Tinted glass on minibuses and people carriers remain tinted for The above reasons (UV/Sun burn) as they tend to carry passengers on longer trips

#### Replacement Glass

With regards to Replacing glass, out of interest I contacted Ford and I was surprised to find out that they do not make clear glass for the Tourneo Minibus - Glass is Tinted as Standard.

In this case what do you expect the drivers to do?

#### Timing

I also find the change over date (November 2018) to be unrealistic for some drivers.

Some Drivers have only recently purchased their vehicles and have 3 or 5 year finance agreements, unaware of the councils pending changes and in these cases they should not be affect, until the finance is clear.

I would like to come and talk at the council board meeting to discuss my finding.

I look forward to speaking to you soon.

Kind Regards

Dear Sir/Madam

Please allow me to introduce myself. I am the proprietor of Harlow Taxi Hire Ltd. I supply London style Licenced Hackney carriage Vehicles to drivers who wish to rent them to operate within the district of Harlow.

I've enjoyed thus far a good working relationship with The Licensing officer, Mr David Taylor & his Team. However some of their current proposed changes to modify and replace conditions to the licencing of Hackney Carriage vehicles and private hire vehicles, are potentially a cause for concern in their current form, not only for myself personally & my business, but also to the drivers who rent their vehicles from myself.

With regard to the up and coming proposals, some of the suggested changes are certainly reasonable and are in need of updating or improving. However, others seem unfair to proprietors and have the power to put drivers out of work and also to close my business.

Below are list of my concerns and views on how the proposed changes will affect my business and drivers who rent Taxis from me.

Introduction of Euro 4 Standard For taxi & Private Hire vehicles.

During Meetings with the Licensing team, I have already acknowledged that in principle, that this proposal is something myself & indeed the rest of the Taxi trade, understand the reasoning for & accept the concept. The issue that gives concern to all of us is the time frame they are proposing is unrealistic for the Hackney Carriage trade to comply.

There are currently very few Euro 4 compliant Hackney Carriage Vehicles for sale at an affordable cost. You may be aware London has a 15 year old age limit, that in turn means that there are very few compliant to the proposed Euro 4 requirement, that leave London until they are 16 years old and the ones that do change owners command a very high price.

On average, the cost to replace a vehicle in this time frame will be in the region of £10,000 each.

Michael Pitt, the Environment & Licensing manager confirmed this, to councillors present at the last committee meeting.

Currently I own and licence 16 Hackney Carriage vehicles in Harlow. For me to change my entire fleet of vehicles to euro 4 with the costs outlined earlier. It is apparent that I will be looking at a cost of in excess of £150,000. This is an unrealistic amount that I simply cannot afford, in the timescale suggested.

I have included a letter from my accountant (MG White & Co Chartered Accountants.) to show my business turnover and how much of an impact the proposed changes will have my business and drivers who rent Taxis from me.

Currently I charge £145.00 per week to rent a Hackney Carriage vehicle. In London to hire a similar standard vehicle, drivers would be expected to pay in excess of £280.00 per week. Proprietors can ask this in an affluent city, because the level of work there with tourism etc. is far greater than in Harlow. I feel I've always charged a fair & reasonable rent on my vehicles. & obviously would wish this to continue. Which makes any of the three scenarios outlined below horrific, to myself & potentially drivers that rely on me for their livelihood.

To meet the proposed Euro 4 changes, these are my 3 options;

1st To do nothing and let my business close, therefore possibly putting 15 drivers and myself out of work.

2nd increase my drivers rents by 50% (which of course, some of them will not pay, or be unable to, and as a result they would leave) in the hope that I will be able to cover the remaining cost and try and buy the suggested vehicles in the timescale.

3rd to increase my drivers' rents by an even more unfair 79%. This will completely cover the cost of the replacement euro 4 compliant taxi. but I fear, with the economic crisis that is currently happening within the trade. I cannot envisage any of the drivers will pay this amount and I think that it would grossly unfair for me to have to ask this amount.

If the committee would consider allowing the transition to Euro 4 in 6/7 years' time, therefore by 2023/2024, all vehicles will be Euro 4 compliant. Replacing the vehicles in this suggested time frame is something we can afford without imposing excessive costs to my business and drivers who rent Taxis from me. (whom I'm sure would seriously consider as a consequence, were this proposal to go ahead unchanged, asking the council for a fare increase to recover these costs which therefore will in turn increase the cost to their customers which would also be regrettable.

A New Condition Which May Not Allow Insurance Written Off Category "C" vehicles to be licensed.

The RAC describe a "Cat C" write off as;

"Vehicles written off after an accident, a flood, or fire damage are often classified as Cat C. In its simplest form, it means that although the car is repairable, the cost of the parts, labour and potentially an expensive hire car would significantly exceed the value of the vehicle. From a business point of view, if your car insurance company deems the damage to be beyond economic repair, it may be classified as a Cat C write-off."

<http://www.rac.co.uk/drive/advice/know-how/what-does-cat-c-car-insurance-mean/>

Although I do not currently own or hire any "Cat C" write offs. This does not change my view. From the RACS definition above it would appear that the vehicles can be repaired and when this is completed, it will be as safe as any other vehicle. The problem arises because it's simply not cost effective for insurance companies to pay for the labour/parts etc involved in the repair.

For someone like myself, or any other individual in my line of work that has the knowledge

to repair a vehicle back to its original condition, but only has to pay for parts and not labour charges, the subsequent repair costs would be significantly lower.

e.g. if a repair garage produced an estimate with parts and labour that were to be excessively high this would very likely create a "Cat C" write off. However, with myself only having the costs of parts, I am therefore in a position to repair the vehicle at a much reduced cost.

Furthermore I have had in the past, many issues with insurance companies over the cost of damaged/off road licenced vehicles. They do not take the additional costs e.g. licence fee or test into consideration, or the changes we make to vehicles to make them safer or more efficient Taxis. This can have a big impact on how much they consider the vehicle is worth, or in the cost of a replacement.

Therefore, what is considered by the insurance company to be a "Cat C" write off value, is generally much lower than would be considered reasonable. Insurance companies, mine included are aware of this. Moreover I have argued this point with them and won. The insurance company had wanted to write my licenced vehicle off & after explaining everything I have mentioned above to them, they have then agreed to repair the vehicle, & thus reverse their initial decision.

Some of these vehicles are currently in service today and have passed every MOT and Compliance with no issues. Therefore, in light of this, I feel it is unjust & unnecessary to assume that if a vehicle was once a "Cat C" Write off, then it is no longer fit to be a taxi.

To close, In consideration of my letter I'm hopeful this committee will understand how much impact the proposed changes will have on all drivers' livelihoods, and I hope the trade and licencing team can continue to work together on a solution that is an acceptable compromise to everyone.

my views on;

\* 17. Do you agree or disagree the Council should require the applicant for new vehicle licence to buy a brand new vehicle?

18. Do you agree or disagree the Council should limit the number of Hackney Carriage vehicle licenses it will issue?

I am in no way against new proprietors entering the trade and there are many ways in which they can do so.

I believe that if this proposal is agreed it will have devastating impact on the current Hackney Carriage drivers that work in Harlow Town. When the original 55 limit was raised to 75 in 2003 there was a lot more custom for the Hackney Carriage trade. Since then I believe that the level of trade has significantly declined and therefore a number of Hackney Carriage drivers have left the trade both old and new plates have been returned to the council. The number of vehicles remaining is at a workable level.

Currently I have 4 Hackney Carriage vehicles without drivers, I also know of a number of Hackney Carriage proprietors that are willing to sell their business for a lot less money than the cost of buying a new Hackney Carriage vehicle. I do not think that if someone wants to enter the trade that it is hard or expensive to-do so. I believe that the reason that less people enter the Hackney Carriage trade in Harlow is due to the lack of work. Over the last

2 years I have had 6 new licenced Hackney Carriage drivers hire vehicles from me. Since then 1 has bought his own Hackney Carriage vehicle from another driver, the other 5 were originally private hire drivers and have since returned to work as private hire drivers due to lack of work. In the last 3 months 2 of these drivers have returned to Hackney Carriage as they both "need to earn less money now" which demonstrates the current struggle to earn a living as a Hackney Carriage driver. This also demonstrates that drivers can enter and exit the trade at will.

The real issue is not going to be now but if the new proposed condition to eliminate the new taxi new plate rule is replaced by any Euro 4 complaint Hackney Carriage vehicle the real problem will arise in 6 or 7 years.

At the moment as I stated above Euro 4 complaint Hackney Carriage vehicles are expensive but in time they will not be. The trade will not cope with a vast number of new vehicles trying to work the few ranks we have and in addition over ranking at the Playhouse the main rank and at the train station is real problem for everyone especially at the train station. Making it far easier to bring more Hackney Carriage vehicles on to the town is only going to make this worse and make it even harder for drivers to maintain minimum wage.

I agree that the cost of new Hackney Carriage vehicles is a lot but for a driver that is prepared to do so and shows commitment to the trade. It shows that they have an invested interest in the trade to help it grow and continue to nurture the custom that the other drivers have built.

As above I agree that a brand new Hackney Carriage vehicle is expensive, however due to depreciation they will not be expensive forever and I believe a more thoughtful compromise is that rather than new proprietors buying a brand new Hackney Carriage vehicle to obtain a plate this be lowered to a 3 year old or newer Hackney Carriage vehicle. This would allow new proprietors to enter the trade whilst maintaining a constant not a varied cost that would be lower over time. This would also mean that new vehicles would meet euro 5 euro 6 and higher.

Yours truly

11.providing it meets current standards

15.there is a legal position in place

14. This is a leading question and from the way the question is phrased the council obviously wants to do away with this restriction. The current system obviously works as the Town has an excellent Hackney Carriage service. The only people qualified to answer this are the Hackney Carriage Drivers who inform me there are no availability issues with Hackney Carriage licences in Harlow.

Euro 4 standard - Let's wait until we have exited EU, then make a decision on our standard of emissions.

Tinted window - Don't understand the term objective standard. Keep the current conditions. Dont agree with comments that tinted window are a concern to the Public. There is not one reported crime incident that supports the necessity to impose standards on tinted window. Harlow Council have not justified the necessity to review the current rules relating to tinted windows. That is because there is not even 1 percent of public concerned. This is an example of unreasonable conditions of license.

Removal of 2mm tyre tread - Once again, MOT standard is fine. When a License vehicle

has had MOT, it is the responsibility of the vehicle owner to make sure their tyres are legal. The police will issue a penalty to motorist with tyres below minimum tread.

Changes to dents etc - Lets use the term "SIGNIFICANT" to attract passenger concerned.

Review of type and size of PH vehicles - vehicles should be large enough to carry 4 passengers and luggage. Petrol, diesel, gas and hybrid vehicles should be allowed to be used as private hire vehicles.

New condition relating to chauffeured vehicle - I agree with this review. Many HC licences are owned by one person that plates old rickety vehicles and rents them out to licenced drivers. The plates should not be bought as part of the sale of that vehicle. Licence plate should not be able to be transferred to another licenced driver but surrendered to Harlow Council.

Compliance testing intervals- In my opinion only one test is necessary each year. Both HC and PH vehicles should have the same conditions applied.

17. On the face of it this requirement may seem unfair but it is a sensible measure and ensures any prospective licence applicant is truly serious and carries out due diligence before making such a heavy financial commitment. The truth is that anyone doing proper research would soon realise that taxis are very expensive to maintain, the trade is under extreme pressure and it is not a viable option as existing drivers are having to work extremely long hours to make ends meet, or even at times to achieve minimum wage.

This is not a closed door trade as there are existing 'old' licences available to transfer now that do not require the purchase of a new vehicle, but these are not being taken up.

18. Limiting the numbers is a good and reasonable measure for the reasons given above at 17.

With regards to being seen as anti-competitive surely this only applies when competition improves the experience for the consumer. There is no unmet demand and the travelling public is adequately catered for at all times. Also competition would not drive down the cost to passengers as the local authority decides what is charged, so what would be the benefit.

As previously mentioned there are already ways for prospective drivers to enter the trade within the current limitations, so why increase the numbers?

HDC should require that a significant proportion of Private Hire Vehicles are readily wheelchair accessible.