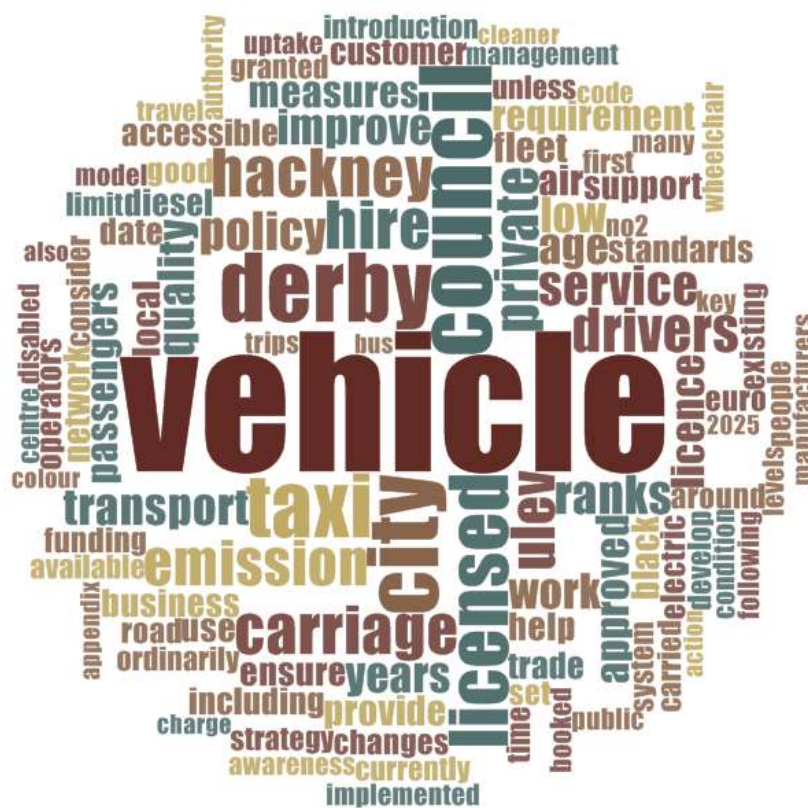


Proposed Taxi and Private Hire Vehicles Strategy 2020 CONSULTATION RESULTS



Version Control

Date Issued	Version	Author	Status	Reason for change
03/07/19	V1.0	HC	Draft	n/a
05/07/19	V1.1	HC	Draft	Amendments. Addition of 5.9.1
17/07/19	V1.2	HC	FINAL	Addition of emails/letters
05/08/19	V1.3	HC	FINAL	Additional emails/letters added

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1. Executive summary

Background and Context

Derby City Council is committed to improving the city's transport offer whilst supporting the trade to meet the demands of cleaner air and smarter, safer and cleaner Taxi and Private Hire (TPH) fleet. We are proposing Taxi and Private Hire Vehicle (T & PHV) Strategy that seeks to achieve this but also aligns with the wider vision for Derby.

In order to ensure that the Council understands local views and that these views inform any proposals, a twelve week public consultation was undertaken from 8 March to 31 May 2019. Feedback was welcomed from taxi/private hire drivers and operators, trade representatives, residents, local business and statutory bodies to help identify and develop further the taxi and private hire vehicle strategy for Derby.

The consultation sought opinion on the actions within the proposed Taxi and Private Hire Vehicles Strategy 2020 and the Hackney Carriage and Private Hire Vehicle Age and Specification Policy.

Methodology

The consultation was primarily conducted through an online survey. Paper versions (and translated versions) of the survey and strategy were available on request and at the Council House reception and at the Licensing booth. Stakeholders and individuals were also given the opportunity to write in with any other comments they had and these have all been incorporated in this report.

As part of the consultation Council officers also held 6 workshop sessions over 2 days with members of the trade and public. The workshops included a presentation, a summary of the proposals and question and answer sessions. Participants were encouraged to complete the survey online although paper copies were also available at the events. Council Officers also met with various forums and groups to discuss the proposals.

Main findings

OUR VISION

Over half of respondents (52.8%, 270) agreed with the overall vision for the future, 'to improve taxi (Hackney Carriage) and private hire vehicles through: embracing new technology, improving service and safety and modernising the fleet', with 38.1% in disagreement.

THE MEASURES AND ACTIONS IN THE PROPOSED STRATEGY

Respondents were asked for feedback on the proposed actions and measures set out under the six main themes of the strategy.

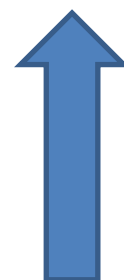
The most support came for the proposed actions and measures that underpin closer working with neighbouring districts.

The least support was for the proposed measures and actions to create a clean fleet.

Themes

1. Work with neighbouring districts
2. Improving customer experience and services offered by the trade
3. Technology
4. Safeguarding
5. Measures to help encourage the use of low emission vehicles
6. Clean fleet

MOST SUPPORT



LEAST SUPPORT

DIFFERENCES BETWEEN GROUPS

Throughout the consultation there was a statistically significant difference in viewpoint given between the two distinct groups:

- those in the trade (*hackney carriage driver or owner, private hire vehicle driver or owner, a private hire operator, or a trade representative*)
- those that were not in the trade (*Derby resident, friend/relation of someone in the trade, local business/organisation or on behalf of a Statutory body*).

Non-trade were supportive of the overall vision for the future of Taxi and Private Hire Vehicles in Derby through embracing new technology, improving service, safety and modernising the fleet. Trade, on the other hand were less positive, raising concern with specific measures/actions and what could be expected of them within the proposed time frames. [5.1.2 of main report]

KEY AREAS OF POSITIVE FEEDBACK

- Developing a framework enabling Councils the right to enforce against licensed vehicles operating within the area that are not adhering to licensing requirements [5.4 of main report]
- All new drivers to pass an English test before licence granted
- Work with Police, University, Derby Live and BIDS to launch a safety awareness campaign [5.6.2 of main report]
- Introduction of E-newsletter to improve communication between Council and trade [5.5.2 of main report]

KEY CONCERNS RAISED

- Age and emission limits to the licensing process [5.8.2 of main report]
- Provision of mandatory eco-driving course as part of licence process [5.3.3 of main report]
- Driver dress code [5.5.1 of main report]
- Taxi ranks as ULEV only [5.2.4]

2. Background

- 2.1 Derby City Council is committed to improving the city's transport offer whilst supporting the trade to meet the demands of cleaner air and a smarter, safer and cleaner Taxi and Private Hire (TPH) fleet.
- 2.2 Like many cities and towns within the UK, Derby is under a legal obligation to improve its air quality. It is important that proposals and actions contained within the proposed Taxi and Private Hire Vehicle (T & PHV) Strategy align with the wider vision for Derby, including present and upcoming changes to the Council Plan, Local Transport Plan and various policy changes to improve the Derby experience.
- 2.3 Derby is committed to improving its transport offer and integrating services where possible through the use of trains, buses, park and ride schemes, electric bikes and TPH. Good quality transport is crucial to delivering economic benefits whilst contributing to a low carbon transport system and improving people's accessibility to services and employment. The measures set out in the proposed T & PHV strategy will contribute to Derby's Transport Vision 2026.
- 2.4 There are currently around 270 Taxis licensed within Derby, all of which are diesel vehicles. These comprise of two main manufacturers; the London Taxi Company (formerly London Taxi International) and Metrocab. Both of their parent companies are investing heavily in electric vehicle technology as well as several other manufacturers that will be available in future years.
- 2.5 There are currently around 1,000 private hire vehicles within Derby, although many more are licensed elsewhere and take pre-booked sub-contracted work in the city.
- 2.6 There are currently no age restrictions on TPH vehicles licensed in Derby. This has led to an aging fleet, high emission levels and poor overall condition.
- 2.7 In order to ensure that the Council understands local views and that these views inform any proposals, a public consultation was undertaken. Feedback was welcomed from taxi/private hire drivers and operators, trade representatives, residents, local business and statutory bodies to help identify and develop further the taxi and private hire vehicle strategy for Derby.
- 2.8 The consultation sought opinion on the actions within the proposed Taxi and Private Hire Vehicles Strategy 2020 and the Hackney Carriage and Private Hire Vehicle Age and Specification Policy.

3. Methodology

- 3.1 A twelve week consultation was undertaken from 8 March to 31 May 2019.

- 3.2 The consultation was primarily conducted through an online survey. Paper versions (and translated versions) of the survey and strategy were available on request, at the Council House reception and at the Licensing booth. Stakeholders and individuals were also given the opportunity to write in with any other comments they had and these have all been incorporated in this report.
- 3.3 The trade association DATA requested and received 300 paper copies and proposed strategies.
- 2.4 As part of the consultation Council officers also held 6 workshop sessions over 2 days with members of the trade and public. The workshops included a presentation, a summary of the proposals and question and answer sessions. Participants were encouraged to complete the survey online although paper copies were also available at the events. Council Officers also met with the following:
- The 50+ forum
Disabled Equality Hub
Race Equality Hub
- 2.5 A number of communications were sent during the fieldwork period via a variety of methods: social media – Facebook, Twitter and Linked-in, press coverage – Derby Telegraph and Radio Derby, email to all Councillors to share within their wards, an email to partners – Derbyshire Police, Derbyshire Fire and Rescue and the CCG and internal staff engagement.

4. Data in the report

- 4.1 Data from the closed questions is presented in the report as a % score. This data in the text of the report is rounded up or down to the nearest whole percentage point. Charts or tables therefore may result on occasions adding up to 99% or 101%. On occasions when a table or chart does not match exactly to the text in the report this occurs due to the rounding up or down when responses are combined. Results that differ in this way should not have a variance that is any larger than 1%.
- 4.2 When reading the data, please note that there is a base number against all charts and tables; this is the valid number of responses for that particular question and the figure that the percentages are calculated from.
- 4.3 In total there were **515** responses to the survey, with additional comments also received through letters and emails. Table 1 below shows the number of responses made through each method.

Table 1: Consultation responses

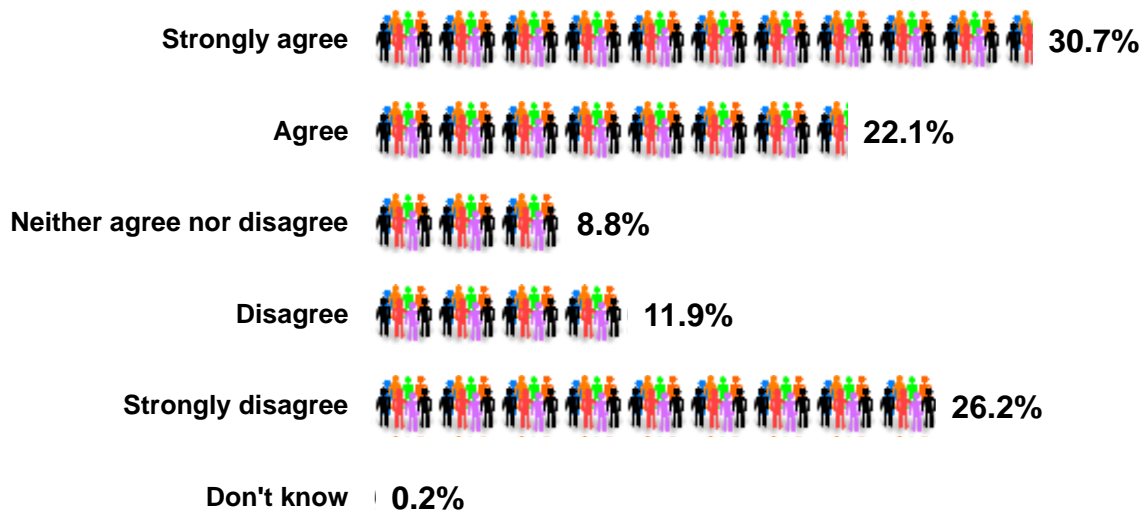
Source of comment	Number of responses
Online responses	346
Paper responses	169
Additional letters and emails	16

5. Main findings

5.1 Vision for the future

- 5.1.1 Respondents were asked the extent of their agreement/disagreement with Derby City Council's overall vision for the future to improve taxi (Hackney Carriage) and private hire vehicles. This would be through: embracing new technology, improving service and safety and modernising the fleet. Over half of respondents (52.8%, 270) agreed with the aim compared with 38.1% (195) that did not. [Chart 1].

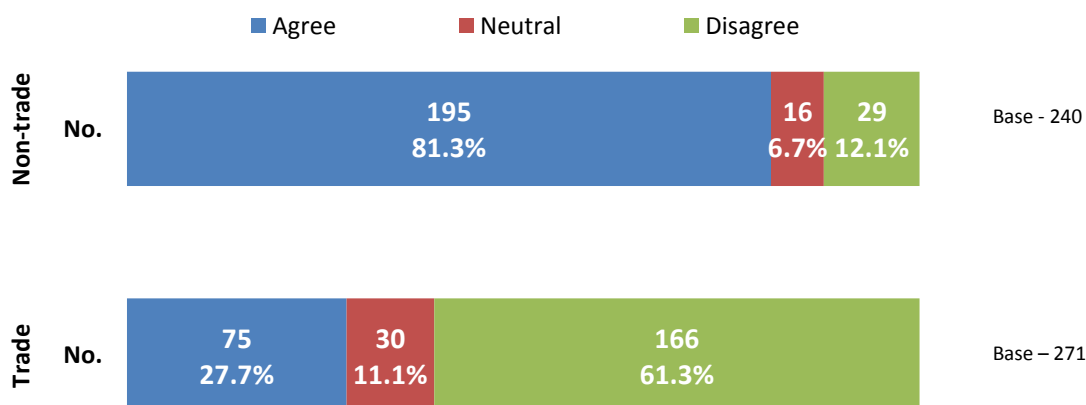
Chart 1: Extent of agreement/disagreement with the aim to improve taxi and private hire vehicles through embracing new technology, improving service and safety, and modernising the fleet



Base: 511 respondents

- 5.1.2 When comparing responses to the proposed vision for the future, there was a clear difference in viewpoint given between the two distinct groups: those in the trade (*hackney carriage driver or owner, private hire vehicle driver or owner, a private hire operator, or a trade representative*) and those that were not in the trade (*Derby resident, friend/relation of someone in the trade, local business/organisation or on behalf of a Statutory body*). Perhaps unsurprisingly those that were not in the trade were significantly more likely to agree with the aim to improve taxi and private hire vehicles through embracing new technology, improving service and safety, and modernising the fleet, receiving over three quarters of responses 81.3% (195). In contrast, over half, 61.3% (166) of those in the trade that responded disagreed with this aim [Chart 2].

Chart 2: Agreement/disagreement with the aim to improve taxi and private hire vehicles through embracing new technology, improving service and safety, and modernising the fleet by trade/non-trade – **Comparison of responses between trade and non-trade**



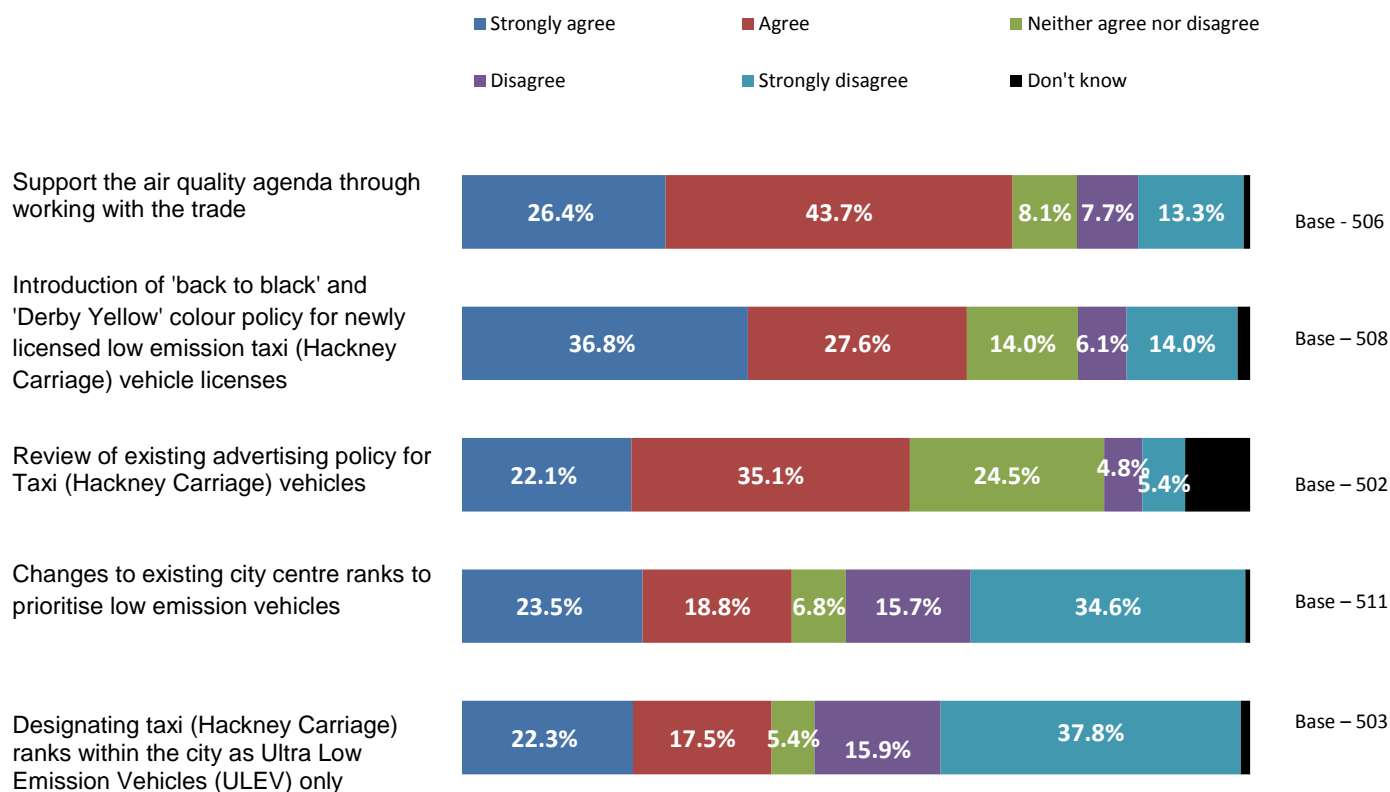
Base: 511 respondents

5.2 Feedback on the proposed measures and actions to help encourage the use of low emission vehicles

5.2.1 Within the proposed Taxi and Private Hire Vehicles Strategy 2020 respondents were asked their strength of agreement/disagreement with the proposed measures contained within the action plan. In consideration of the measures to help encourage the use of low emission vehicles, overall responses tended to be positive towards the actions identified, particularly 'supporting the air quality agenda through working with the trade' where just less than three quarters of respondents 70.1% (353) were in agreement. [Chart 3]

5.2.2 Over half of all respondents also agreed that newly licensed low emission taxi vehicle licences should follow a 'back to black' colour policy with 'Derby yellow' wrapped bonnet, roof and boot (64.4%) and that there should be a review of the existing advertising policy for Taxi vehicles (57.2%). Respondents were less enthusiastic about the designation of taxi ranks within the city with 53.7% (270) people disagreeing with the proposed action. The proposal of 'changes to existing City Centre ranks to prioritise low emission vehicles which may include permitted access arrangements' was also less popular with 50.3% (257) of respondents disagreeing with the measure. [Chart 3].

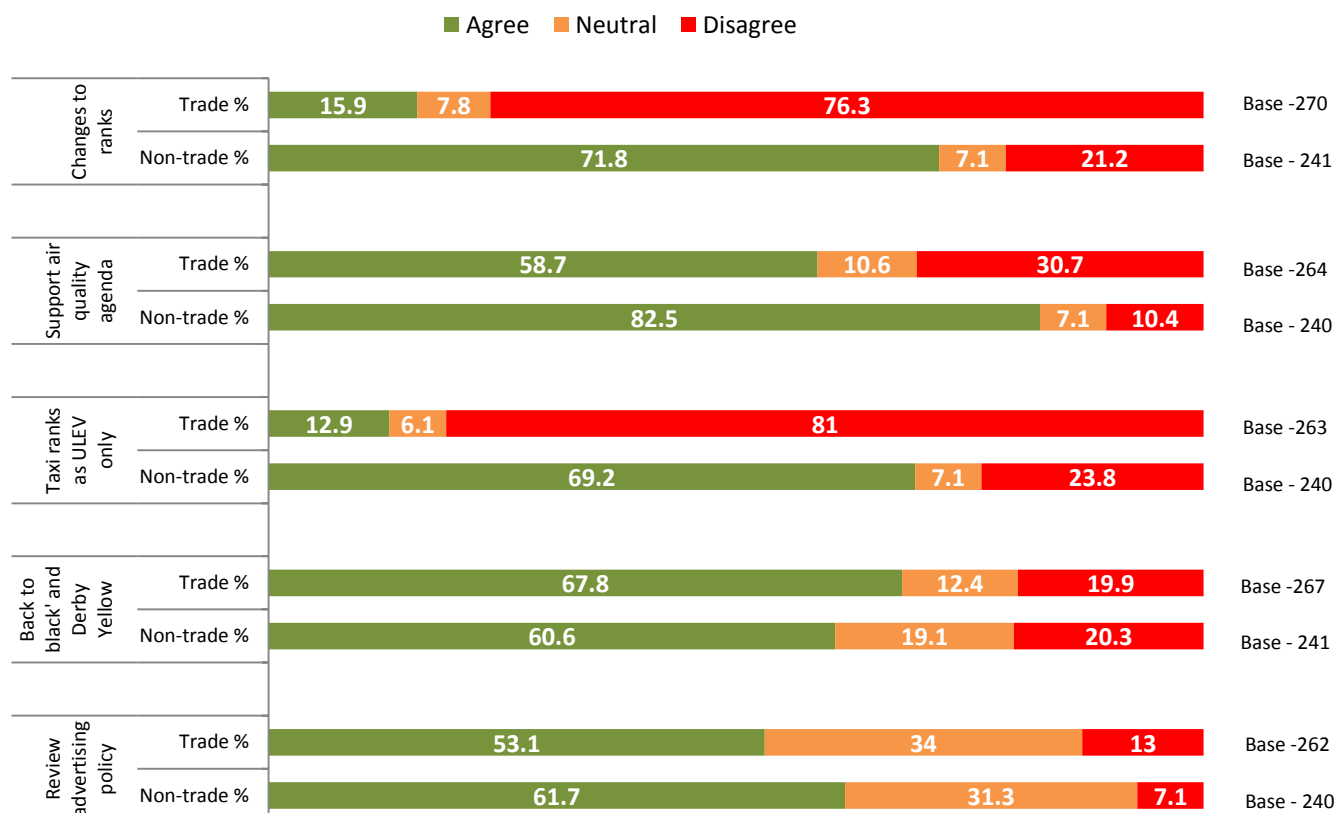
Chart 3 – Strength of agreement/ disagreement with the proposed measures to help encourage the use of low emission vehicles



5.2.3 When comparing responses between those in the trade and those that were not, there was parity in agreement between both groups in respect of the 'Back to black' and 'Derby Yellow' (Non-trade 60.6%, trade 67.8%) proposal and the review of the current advertising policy (Non-trade 61.7%, trade 53.1%). To a lesser extent the support of the air quality agenda was also favourably received achieving over 50% agreement from both groups. However, this was supported more by non-trade (82.5%) than those in the trade (58.7%). [Chart 4]

5.2.4 In contrast, division of opinion between the two groups was most widely marked for the proposals of 'designating Taxi ranks within the city as ULEV only' (Non-trade 69.2% agreed, trade 12.9% agreed) and 'changes to the existing taxi ranks within the city centre to prioritise low emission vehicles' (Non-trade 71.8% agreed, trade 15.9% agreed). Non-trade were generally more likely to agree to all of the proposed actions with each obtaining the majority support. [Chart 4]

Chart 4 – Strength of combined agreement/ disagreement with the proposed measures to help encourage the use of low emission vehicles by respondent type. Comparison of responses between trade and non-trade %



5.2.5 Comments regarding proposed measures to encourage the use of low emission vehicles

Consultees were asked why they had responded either 'strongly agree' or 'strongly disagree' to the statements in this section of the survey. The most common themes emerging from these comments were:

- 1. Support for all black cabs (no or limited yellow wrap)**
 The largest number of comments (70) was made in support of the 'back to black' proposal. A large proportion of these also stated that they were not supportive of yellow wrap on the cabs or if yellow was used it should be very limited.
- 2. Comments generally supportive of any ideas to improve air quality**
 Many strongly agreed with the proposals relating to reducing emissions because they support any actions that will improve air quality in the city. 41 comments were made about this.
- 3. Disagree with ULEV prioritisation at ranks or want ULEV on new ranks only**
 Many drivers or representatives of the trade disagree with the proposal to have designated ULEV only taxi ranks within the city. 40 comments were received about this. Those who strongly disagree are concerned about this proposal reducing rank space in the city. Many also believe that if this proposal were actioned it would

cause some real tension between drivers and that this would be bad for the trade and the people of Derby.

4. Not enough rank space already or concern about waiting time at ranks

Linked to the above comments were general concerns about the current lack of rank space in the city and the feeling that this is very much an existing problem whether the proposals are introduced or not. 39 comments related to this.

5. Disproportionate focus on taxis or unfair penalising of the trade

32 comments were made relating to the impact the proposals would have on drivers. Some respondents strongly disagreed on the basis that they perceive taxi drivers are being unfairly blamed for the issues with air quality in Derby and disproportionately burdened with the responsibility of reducing emissions.

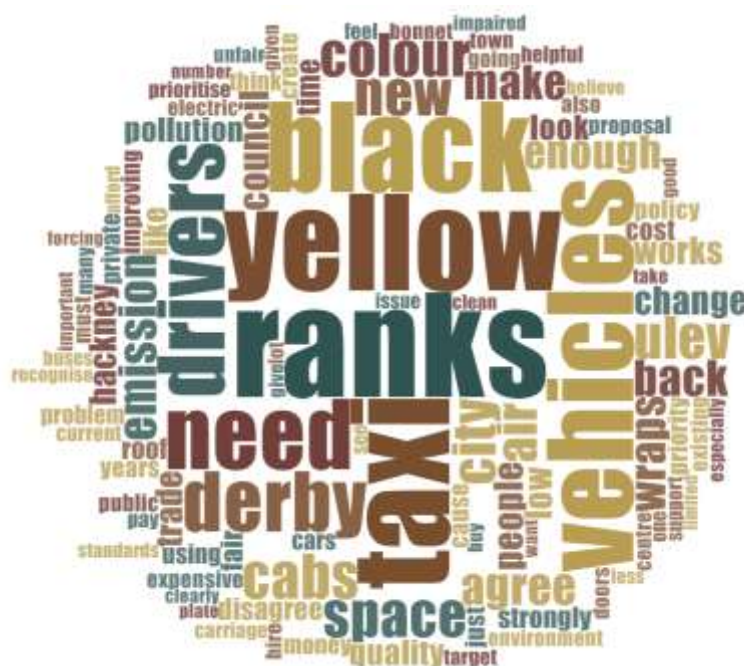
6. Keep taxis all yellow

18 comments were submitted relating to this. Several respondents were concerned about the proposal to change the colour of the hackney cabs in the city because of the impact that this would have on visually impaired people in the city. Many commented that this would be a step back in terms of accessibility.

7. Concern about cost to driver

Some strongly disagreed with the proposals on the basis on the potential high costs that would need to be incurred by the driver in order to bring the proposals in, particularly in relation to any expectations around drivers purchasing new low emission vehicles or making changes to their existing vehicles. 15 comments were made regarding this.

Figure 1: Measures to help encourage low emissions – most common 100 words

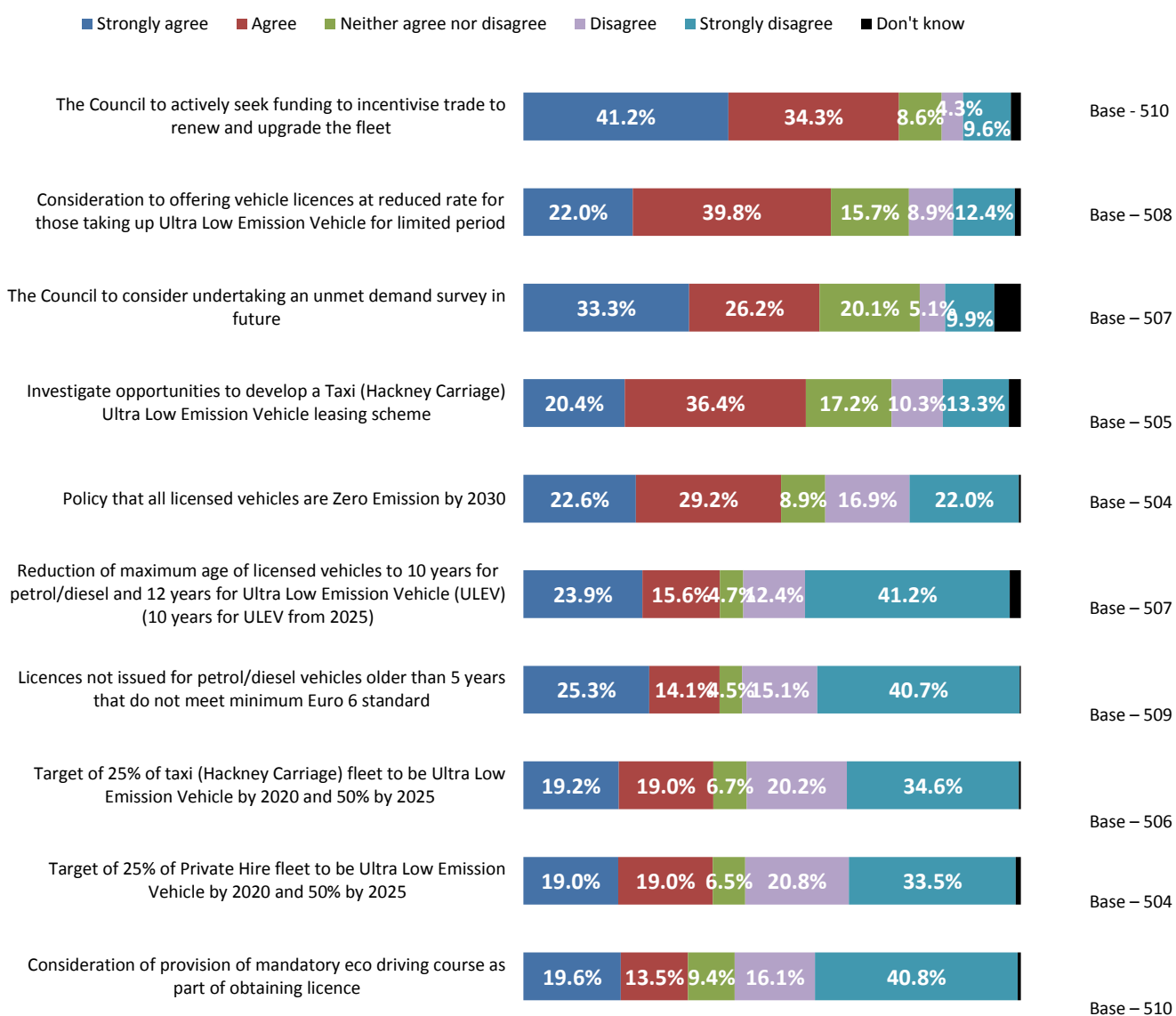


5.3 Feedback on the proposed measures and actions to create a clean fleet

5.3.1 As part of the work to create cleaner air solutions for Derby, 10 proposed measures and actions were identified as part of the proposed Taxi and Private Hire Vehicles Strategy 2020. As illustrated in Chart 5, of the ten actions, respondents were most in favour of five, the most popular 'The Council to actively seek funding to incentivise trade to renew and upgrade the fleet' achieved over three quarters agreement (75.5%). The next most supported measure was consideration to offering vehicle licences at reduced rate for those taking up ULEV for limited period (61.8%).

5.3.2 Over 55% of respondents disagreed with the proposed 'consideration of provision of mandatory eco driving course as part of obtaining a licence' (56.9%). The proposal which had the highest percentage of 'strongly disagree' was the 'reduction of maximum age of licensed vehicles to 10 years for petrol diesel and 12 years for ULEV – 10 years for ULEV from 2025' (41.2%).

Chart 5: Strength of agreement/ disagreement with the proposed measures to create a clean fleet.



5.3.3 Comparing responses from those in the trade and those not in the trade the disparity in responses appears more marked. Non-trade agreed with all of the proposed actions – all achieving the majority agreement. Trade on the other hand were clearly opposed to six of the 10 proposals, over 70% of members of the trade disagreed with five of the measures. The least support from trade was for the mandatory eco driving course as part of getting a licence (84.9% disagreed). [Chart 6]

Chart 6: Strength of agreement/ disagreement with the proposed measures to create a clean fleet between trade and non-trade. **Comparison of responses between trade and non-trade %**



5.3.4 These groups did concur however, in respect of 'DCC to seek funding to incentivise the trade to upgrade/renew the fleet' (Non-trade 77.5%, trade 73.7%) proposal and DCC to consider undertaking an unmet demand survey (Non-trade 57.5%, trade 61.4%). [Chart 6]

5.3.5 Comments regarding proposed measures for a clean fleet

Consultees were asked why they had responded either 'strongly agree' or 'strongly disagree' to the statements in this section of the survey. The most common themes emerging from these comments were:

1. Comments on the age limits of vehicles

The age of vehicles had the largest amount of comments (84), with consultees having mixed views on the proposals. Those in the trade expressed concern about maximum age limits impacting on their ability to afford and operate a business. Those that agreed with the proposals were generally Derby residents and not in the trade. Other comments also suggested that ULEV vehicles should be given a longer age limit.

2. Affordability and the impact on drivers

Many drivers raised concerns about the affordability of the proposed vehicles and the impact this would have on income. A number of comments linked this to the proposed age limit of 10 years which would not be sufficient time to allow drivers to recover the cost of the vehicle. 78 comments were made in this section. 13 respondents commented on the proposals to seek funding to help incentivise trade renewal. Some respondents suggested that help with the proposed changes would be of benefit to the trade. Others did not agree that the Council should be supporting incentives.

3. Emissions and the environment

31 comments mentioned emissions and the environment. The majority of these comments talked about the importance of hitting the target for lower emissions and the environmental benefits. Some respondents commented that other vehicles should also be meeting these standards.

4. The length of time to change vehicles

Linked to concerns about the age and cost of vehicles, 26 respondents had general concerns about the timeframe for changing vehicles. Some respondents were concerned that changing vehicles in the timeframe would not be feasible and have a cost impact on the trade. Other respondents felt that the time for changing vehicles was too long and should be decreased to help meet emissions targets.

5. Hackney carriage

19 comments were submitted about Hackney carriages. Several respondents commented on limiting of licences for this type of vehicle operating in Derby, others commented on the cost of purchase of a Hackney carriage and the time it takes to make money back on the vehicle. Others suggested that the manufacturers guarantee was 15 years on this type of vehicle and the Council should allow this as the time frame.

6. Testing

Some respondents (17) suggested that vehicles over 10 years old could be tested on a more regular basis.

7. Other comments

Respondents also commented on ECO courses (14), need for ULEV (12) and the cost implications, unmet demand survey (12).

Figure 2: Measures to help encourage low emissions – most common 100 words

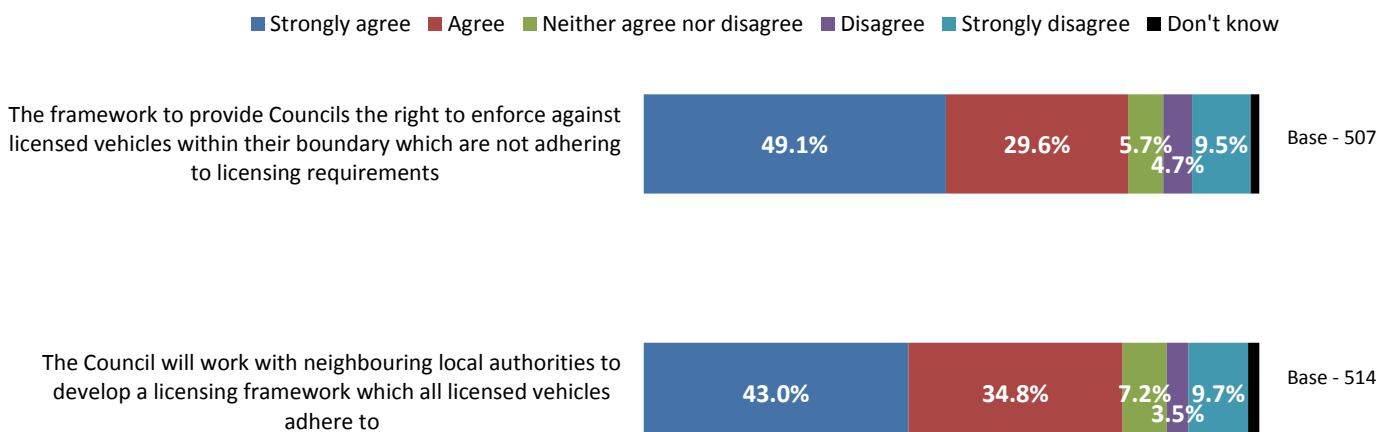


5.4 Feedback on the proposed measures and actions on working with neighbouring districts

5.4.1 Respondents were asked for feedback on the Council's ideas on working with neighbouring districts to develop a coherent Taxi and Private Hire licensing and enforcement policy.

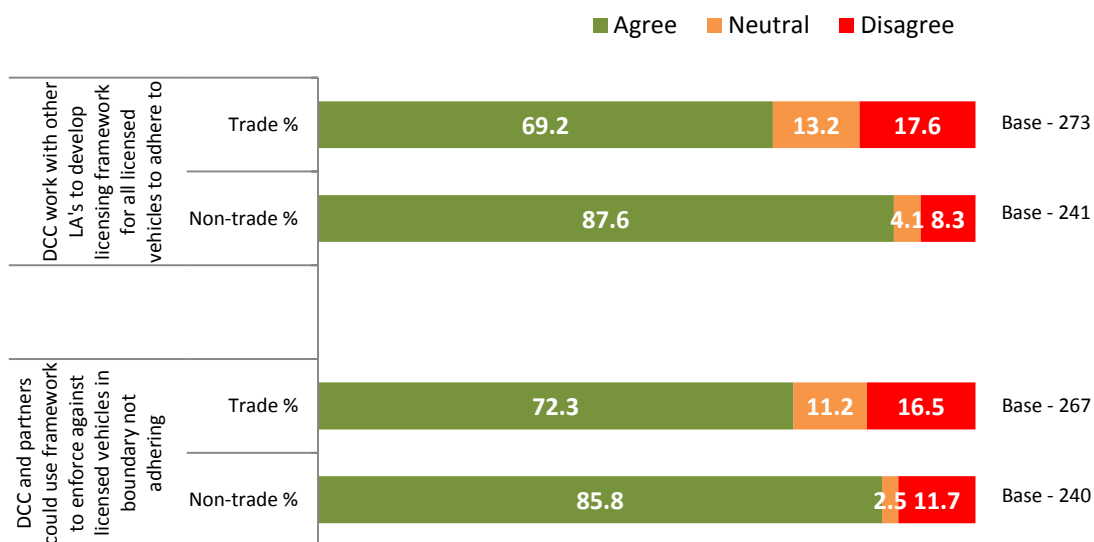
5.4.2 Over three quarters of respondents were in agreement with both actions. 78.7% were in favour of the framework which could give the Council and other partner local authorities the right to enforce against licensed vehicles within their boundary, which are not adhering to licensing requirements and 77.8% were in favour of the Council developing a licensing framework to which all licensed vehicles would adhere to [Chart 7].

Chart 7: Strength of agreement/ disagreement with the proposed measures on working with neighbouring districts.



5.4.3 Both trade and non-trade were in agreement with the measures particularly ‘the framework could give the Council and other partner local authorities the right to enforce against licensed vehicles within their boundary, which are not adhering to licensing requirements (trade 72.3%, non-trade 85.8%)’. The other measure also attained a high agreement rate with 69.2% of trade and 87.6% of non-trade agreeing. [Chart 8]

Chart 8: The extent of agreement/disagreement with the proposed actions of working with neighbouring districts between trade and non-trade. **Comparison of responses between trade and non-trade %**



5.4.4 Comments regarding proposed measures to work with neighbouring districts

Consultees were asked why they had responded either ‘strongly agree’ or ‘strongly disagree’ to the statements in this section of the survey. The most common themes emerging from these comments were:

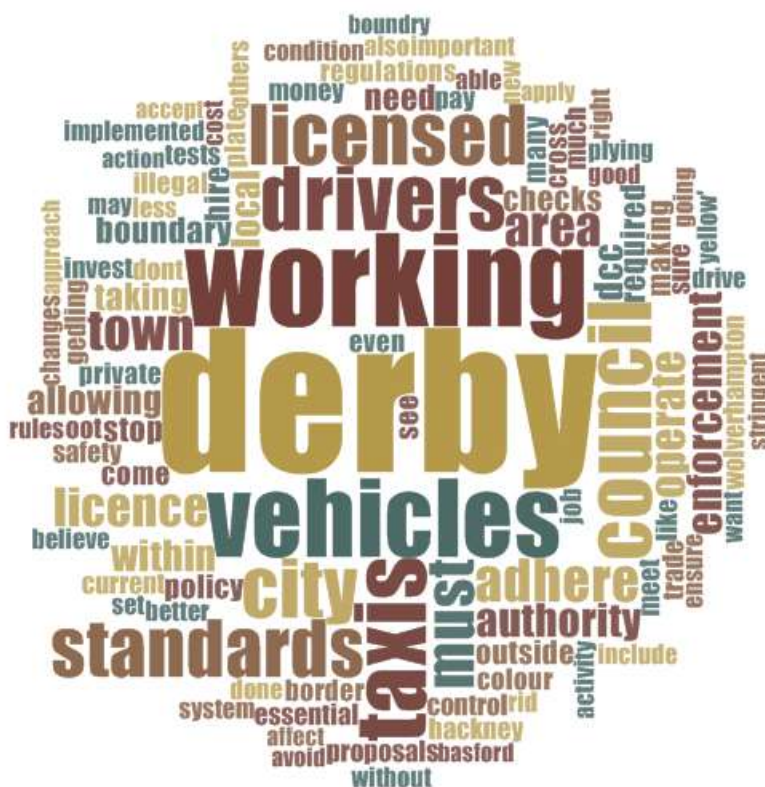
1. Working with neighbouring local authorities

The majority of comments (86) were supportive of suggestions to work with neighbouring local authorities. Respondents commented on the impact of out of area drivers operating in Derby and raised concerns over the potential different standards. They suggested a number of trade vehicles were being licenced in other areas and operating in Derby.

2. Right to enforce

42 comments were made on the right to enforce with the majority of respondents supporting the idea that there should be enforcement. Those that disagreed asked how enforcement was to be managed.

Figure 3: Measures to work with neighbouring districts – most common 100 words



5.5 Feedback on the proposed measures and actions on improving customer experience and services offered by the trade

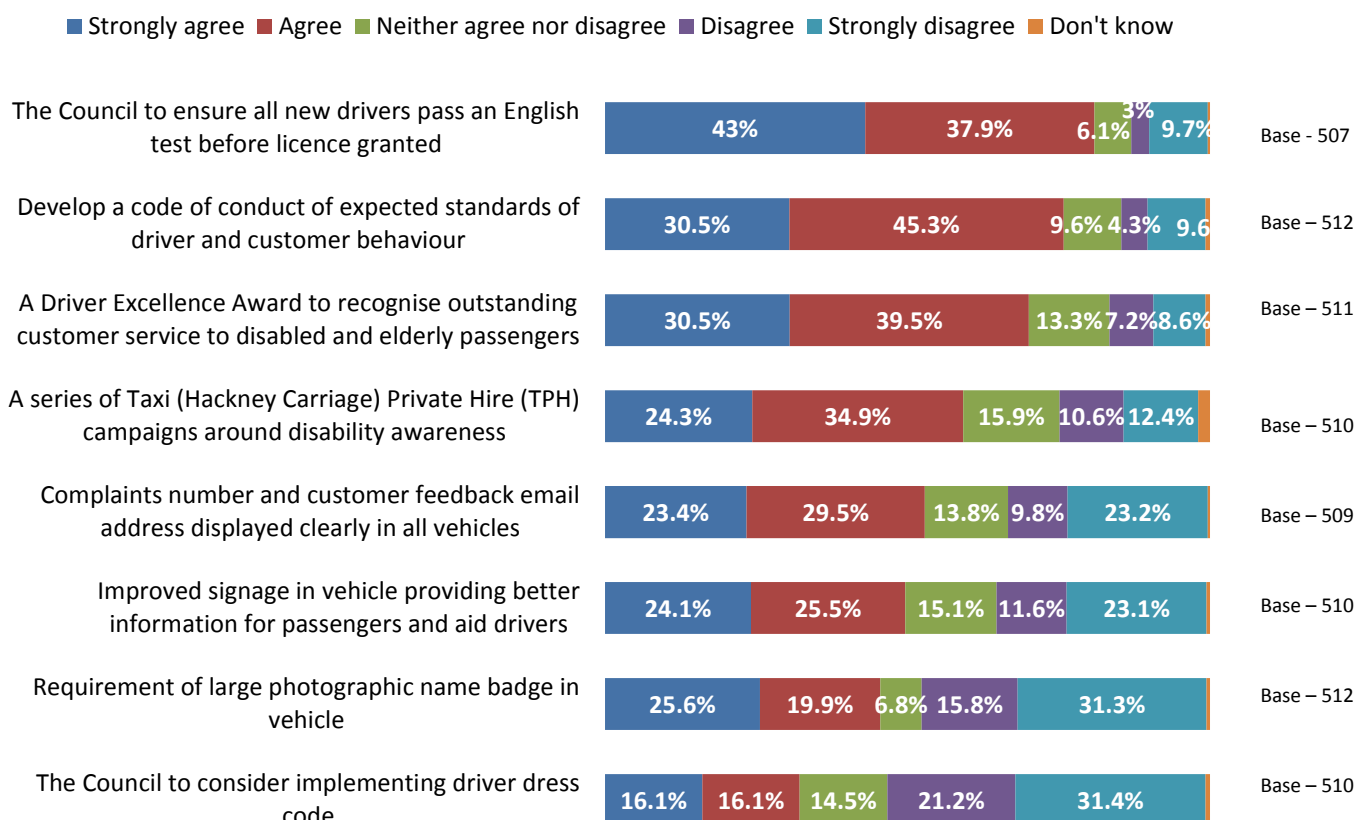
5.5.1 The three most supported actions and measures were:

- 'The Council to ensure all new drivers pass an English test before a licence is granted' (80.9%),
- the development of a 'code of conduct of expected standards of driver and customer behaviour' (75.8%)
- a 'driver excellence award to recognise outstanding customer service to disabled and elderly passengers' (70%).

The two least preferred actions/measures where disagreement was greater than agreement were:

- 'the Council to consider implementing a driver dress code' (52.6% disagreed with proposal)
- 'requirement of a large photographic name badge in the vehicle' 47.1% disagreed with the proposal). [Chart 9]

Chart 9: Strength of agreement/ disagreement with the proposed measures to improving customer experience and services offered by the trade



5.5.2 Comparing responses from the two groups (trade and non-trade) there was general consensus of opinion on the top three actions/measures as identified above. Non-trade were more supportive of all of the actions/measures. Trade on the other hand strongly opposed four actions/measures; namely, the requirement of a large photographic name badge in vehicles (75.7% disagreed), DCC to consider implementing a driver dress code (75.2% disagreed), improved signage in vehicle giving better information for passengers and aid drivers (56.3% disagreed) and the inclusion of a complaints number/customer feedback email address displayed clearly in all vehicles (51.3% disagreed). [Chart 10]

Chart 10: Strength of agreement/ disagreement by trade/non-trade with the proposed measures to improving customer experience and services offered by the trade Comparison of responses between trade and non-trade %



5.5.3 **Comments on improving customer experience and services offered by the trade**

Consultees were asked why they had responded either 'strongly agree' or 'strongly disagree' to the statements in this section of the survey. The most common themes emerging from these comments were:

1. Large photographic name badge

The majority of respondents (51) commented on the large photographic name badge and improved signage. Trade respondents raised concerns about safety of the drivers if a large photographic name badge was required in their vehicle. A number of the respondents commented that photographic ID was already in place.

A number of Derby residents made general comments about all of the proposals suggesting that they would help improve the quality and standards of the trade by promoting driver accountability and the safety of passengers.

2. Dress Code

38 respondents commented on the proposed dress code. Some of the respondents commented that a dress code was not needed or important to them or that drivers should be able to make their own choice. Those that did strongly agree with this commented on the appearance of drivers and a feeling of safety.

3. Improved signage and visibility of the complaints number

There were 32 comments on improved signage in vehicle. Some respondents suggested that information was currently on display and that the amount of information in vehicles needed to be reduced not increased. Others raised concerns that the information would make drivers vulnerable to abuse and harassment. Others commented that there needed to be more simplified and clearer information on display, including the need for complaints information to be clear and visible to passengers.

4. English test

32 respondents commented on the proposals to ensure all new drivers passed an English test. Some of the respondents felt that a good standard of English was important to being able to deliver good quality customer service and communications, others felt that driver standard of English was already being assessed in their written test.

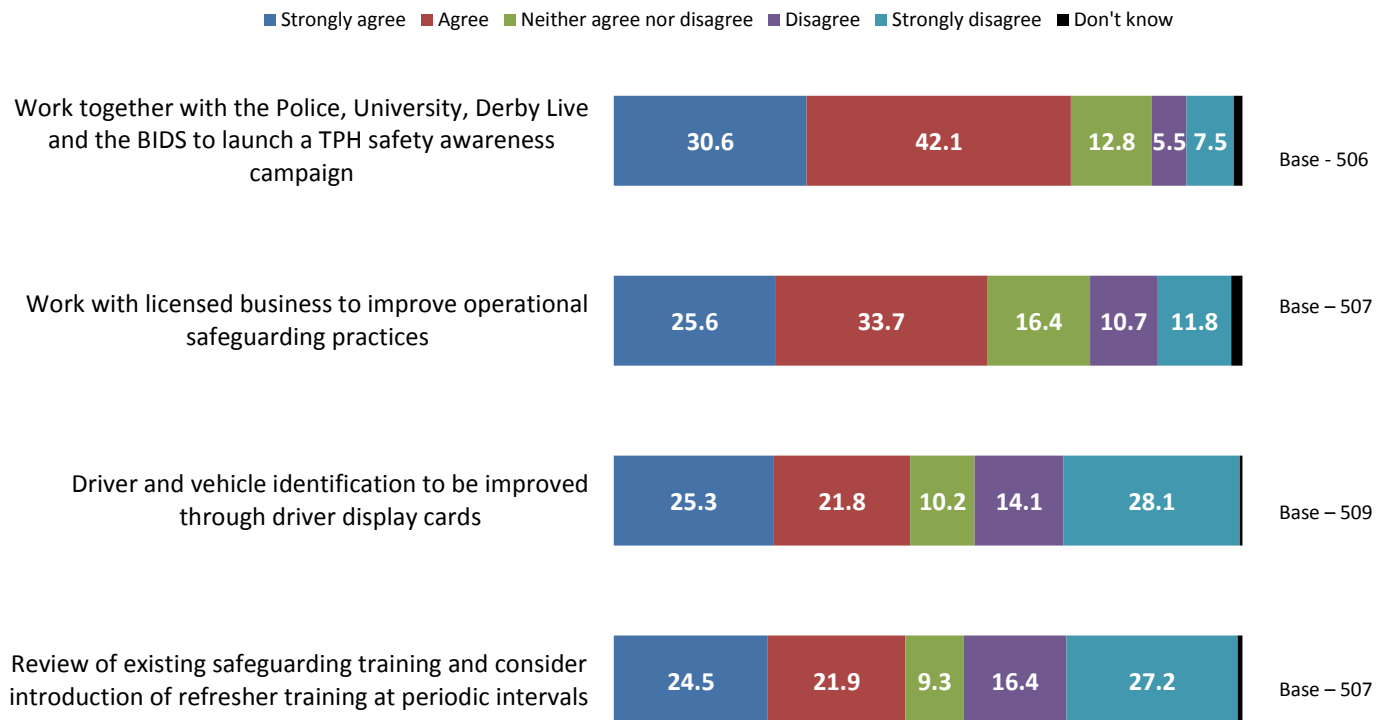
5. Driving standards and code of conduct

Some respondents (29) made reference to the proposed measures raising the quality of driving standards. Some of the respondents referred to existing examples of poor quality service or the need to improve standards in the future. A number of respondents commented on the existing driver code of conduct suggesting they felt this was already sufficient.

5.6 Feedback on the proposed measures and actions on Safeguarding

5.6.1 The action/measure receiving the greatest agreement from the proposed Safeguarding measures was the 'launch of a TPH Safety Awareness campaign in partnership with Derbyshire Police, University of Derby, Derby Live and the BIDS to understand the potential dangers of using unlicensed vehicles' (72.7% agreement). The least favoured measure was the proposed 'review of existing safeguarding training and consider the introduction of refresher training at periodic intervals' which attained only 46.4% agreement, a similar proportion disagreed. [Chart 11]

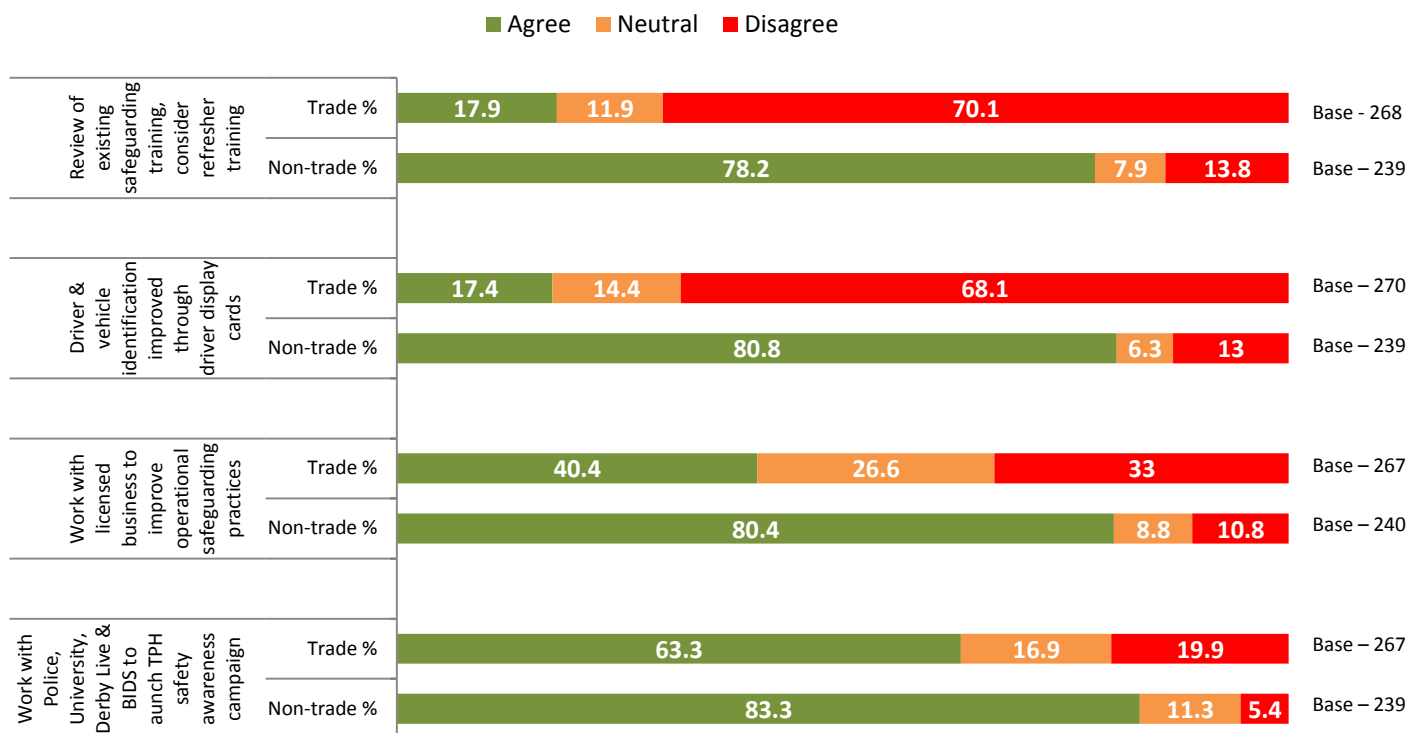
Chart 11: Strength of agreement/ disagreement with the proposed measures to improve Safeguarding



5.6.2 When comparing responses between those in the trade and non-trade the difference of opinion is more pronounced. Whilst both groups were in strongest agreement with the measure identified above (TPH safety awareness campaign), non-trade were far more in support of all of the actions/measures with over three quarters agreeing with each of the proposals.

5.6.3 Conversely, trade widely disagreed with the 'review of existing safeguarding training and consider refresher training at periodic intervals' proposal (70.1% disagreed) and 'driver and vehicle identification improved through driver display cards' where 68.1% of trade disagreed. [Chart 12]

Chart 12: Strength of agreement/ disagreement with the proposed measures to improve Safeguarding by trade/non-trade **Comparison of responses between trade and non-trade %**



5.6.4 Comments regarding proposed measures on safeguarding

Consultees were asked why they had responded either 'strongly agree' or 'strongly disagree' to the statements in this section of the survey. The most common themes emerging from these comments were:

1. Safeguarding

The largest number of comments (63) in this section made reference to safeguarding training and practices. A number of drivers and representatives from the trade disagreed with proposals on the basis of previously completing safeguarding training. Many suggested there was no purpose of a refresher course. Others respondents suggested that that training should be completed at a cost to the Council and not the driver, while some respondents suggested that there was an issue with the quality of the existing safeguarding course. Comments made in this section from Derby residents were generally supportive of suggestions for safeguarding practices and training.

2. Driver and vehicle identification

38 comments on the proposed driver and vehicle identification display cards. Some strongly disagreed on the basis that current identification provided the necessary information. There were concerns from a few respondents that improved information on drivers would be used to abuse and attack drivers both physically and online.

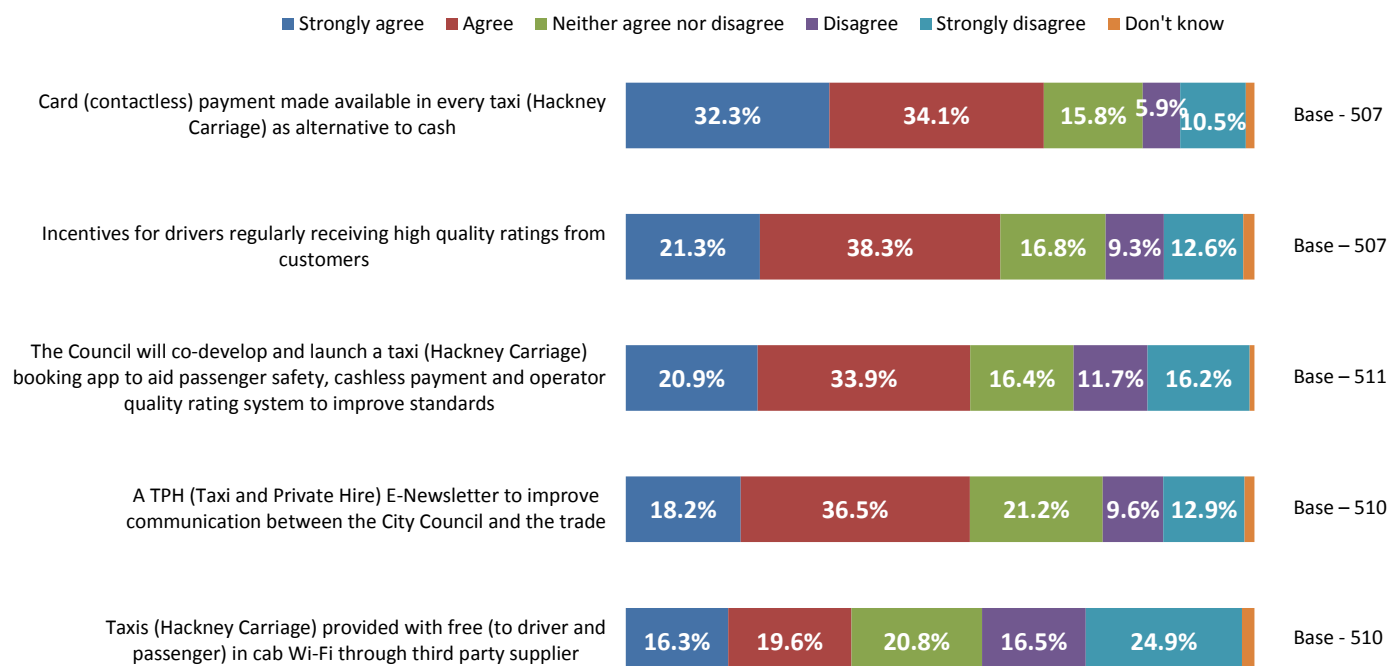
21 comments were received in relation to support safety campaigns. Some comments suggested that disability awareness and equality training should be offered as part of this proposal.

[illegible]

5.7.1 Responses to the proposed actions and measures to improve technology were varied. The action/measure with which most agreed with was the introduction of a 'mandatory card (contactless) payment will be made available in every Taxi as an alternative to cash' to which 66.4% of respondents agreed. All other actions/measures with the exception of 'each taxi will be provided with free (to driver and passenger) in cab Wi-Fi through a third party supplier' achieved over 50% of agreement.

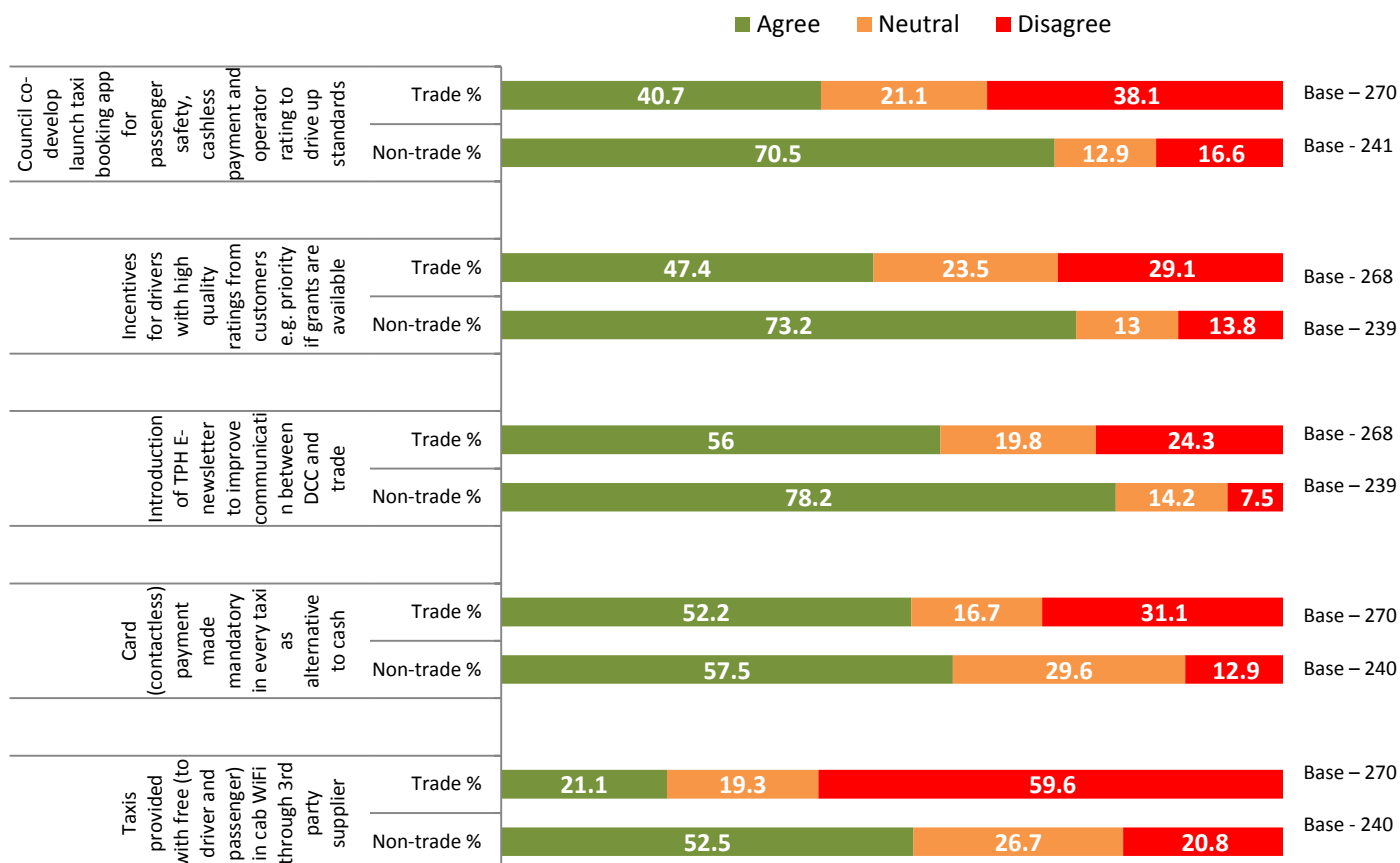
5.7.2 The measure 'each taxi will be provided with free (to driver and passenger) in cab Wi-Fi through a third party supplier' attained a greater percentage of disagreement (41.4%) than agreement (35.9%). [Chart 13]

24



5.7.3 The levels of agreement/disagreement were less varied than other aspects of the proposed strategy. Both groups were most in favour of 'the introduction of a TPH E-newsletter' with 78.2% of non-trade in agreement and 56% of the trade in agreement. The lowest level of support from both groups was to the 'free in-cab Wi-Fi for Taxis'. Whilst for non-trade the response was 52.5% agreement, for trade the response was substantially less at 21.1%. The closest response between the two groups was for the 'card (contactless) payment made mandatory in every taxi as an alternative to cash', 57.5% of non-trade agreed and 52.2% of the trade agreed with the initiative. [Chart 13]

Chart 14: Strength of agreement/ disagreement with the proposed measures on Technology by trade/non-trade **Comparison of responses between trade and non-trade %**



5.7.4 Comments regarding proposed measures to improve technology

Consultees were asked why they had responded either 'strongly agree' or 'strongly disagree' to the statements in this section of the survey. 124 respondents gave their views. The most common themes emerging from these comments were:

1. Taxis with free Wi-Fi

The largest number of comments (59) was made about the proposal for free in cab Wi-Fi. A large proportion of these stated that Wi-Fi is an added extra rather than a necessity. Others queried who would pay for the facility following the initial free set up and some cited that customers generally had internet access with their personal mobiles.

2. Contactless card payments

Many agreed with the proposals relating to Taxis taking card payments asserting that this would be beneficial for passengers and safer for drivers. Others were more cautious, agreeing in principle but with the assurance that cash payments could still be made and that contactless facilities may not be appropriate for the elderly or some disabled passengers. A number of drivers stated that contactless/card payment could already be made and that there was no need for it to be mandatory. 51 comments were made about this.

3. Comments on Council involvement

25 comments were concerned about the level of Council involvement in the trade citing that the Council's role was as a regulator not as a proprietor. Others felt that the expense to the Council was likely to be considerable (software/Wi-Fi) and was not easily justified.

4. **Booking app**

19 comments were received about the proposal to introduce a booking app, with many respondents saying that technology development should not be a core competency of the Council. Others suggested existing apps that were tried and tested. Some were concerned that there would be a cost associated with the app which would inevitably be passed on to the passengers.

5. **Incentives for drivers**

Concerns were raised by some that a proposed ratings scheme may be abused, particularly as a result of racial bias. Others agreed with the incentive scheme providing that it was fair and proportionate. 17 comments related to this.

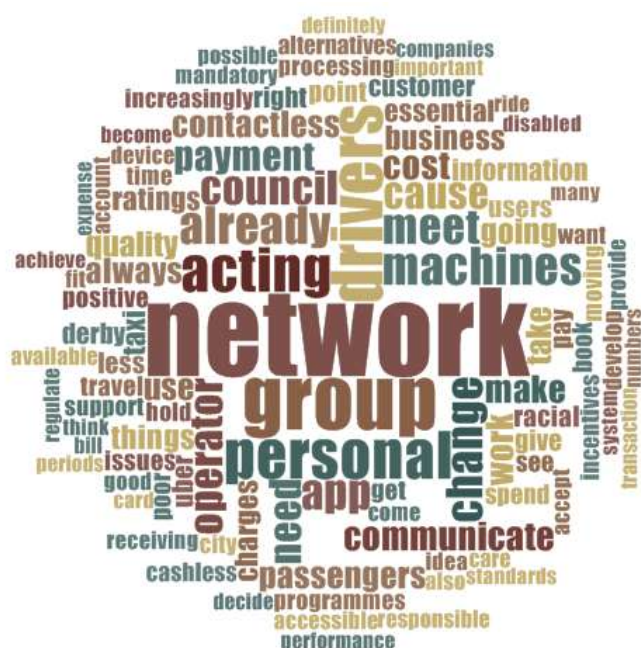
6. **Suggestions/general feedback**

16 comments were made with suggestions relating to the proposals. Some respondents made suggestions as to the types of booking apps that would be beneficial. Others suggested that the inclusion of payment devices should be accessible (both reachable and usable) for disabled patrons. Several felt that whilst the use of technology was important it was also imperative that alternatives for those that did not use technology were also available.

7. **General positive comment**

Several respondents were supportive of all of the proposed actions/measures and said that it was important to embrace technology to modernise and professionalise the service. Others said that the measures gave more options to the consumer and that the move towards apps and card payments was more in line with modern customer interfacing businesses. 10 comments related to this.

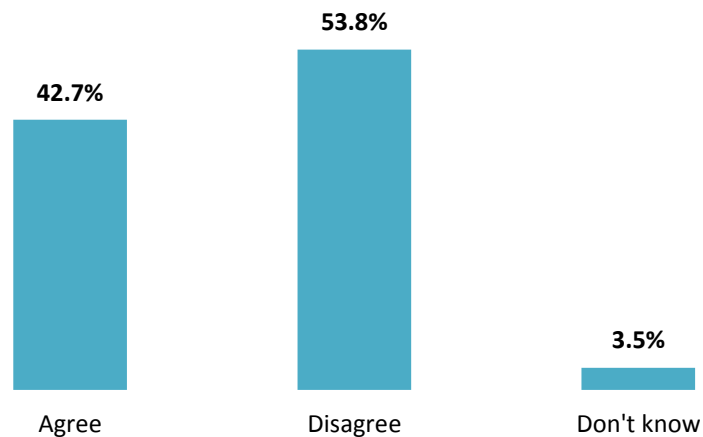
Figure 6: Measures to improve technology –100 most common words



5.8 Feedback on the Hackney Carriage and Private Hire Vehicle Age and Specification Policy

5.8.1 Respondents were asked whether or not they agreed with the proposed introduction of age and emission limits to the Hackney Carriage and private hire vehicle licensing process in this proposed policy. 276 people disagreed with the proposals (53.8%) whilst 219 (42.7%) were in agreement. [Chart 15]

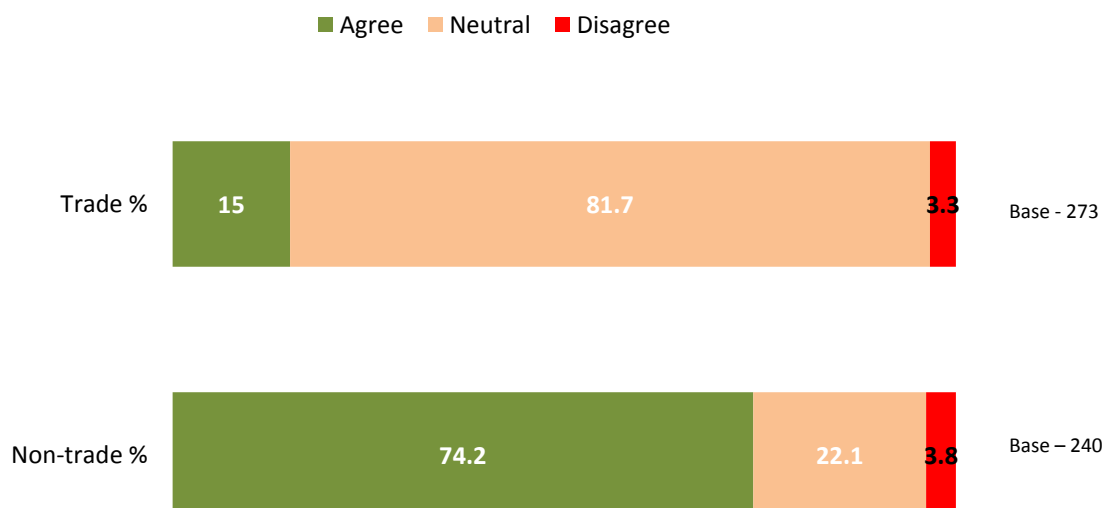
Chart 15: Strength of agreement/ disagreement with the proposed introduction of age and emission limits to the licensing process



Base: 513 respondents

5.8.2 When comparing the responses given from the two groups there is a clear difference in opinion; trade were opposed to an age and emission limit being introduced with 81.7% (223) of trade respondents disagreeing. Non-trade were in agreement with the proposed age and emission limits (74.2% agreed). [Chart 16]

Chart 16: Strength of agreement/ disagreement with the proposed introduction of age and emission limits to the licensing process by trade/non trade **Comparison of responses between trade and non-trade %**



5.8.3 Comments regarding proposed introduction of age and emission limits to the licensing process

Consultees that 'strongly disagreed' to the proposed introduction of age and emission limits to the licensing process were given the opportunity to explain why. 159 respondents gave their views. The four most common themes emerging from these comments were:

1. Age restriction

72 comments were made relating to this. A number of respondents felt that the deadline was too early and they would not have sufficient time to make such a large investment. Others agreed with the emissions requirements but not the age limits citing that twice yearly testing would ensure the vehicle was suitably well-maintained. Several were concerned that their Euro 5 vehicles would soon be deemed obsolete even though the purchase was made within the last 2-3 years.

2. Affordability

46 respondents were concerned about the costs involved in purchasing a new vehicle and believed that age limits would need to be increased due to amount of investment involved. Others simply said that they would not be able to afford a new vehicle and that such a policy would impact on their ability to work.

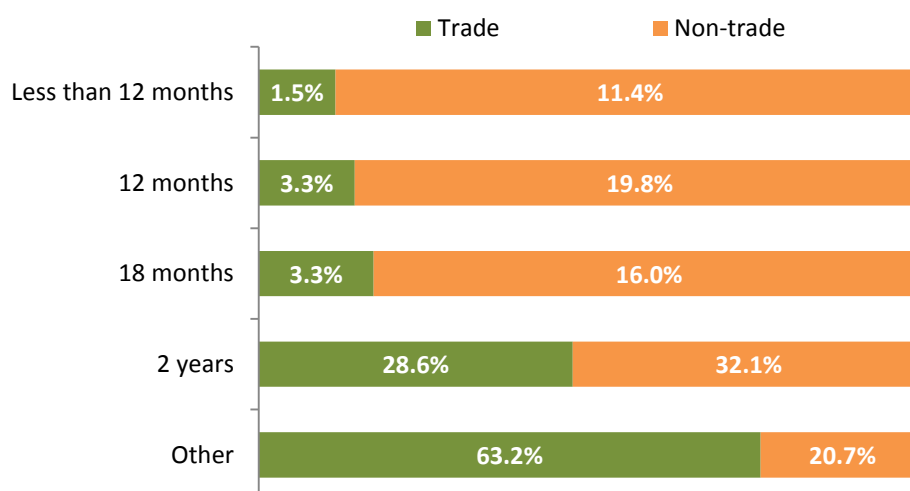
3. Emissions

36 comments were made relating to this. Several of the comments were concerned that taxis/private hire vehicles were being unfairly targeted to move to low emission vehicles. Others said that the car industry was moving towards low emission vehicles and that within time drivers would be replacing with improved low emission vehicles. Some agreed that low emission vehicles should be brought in but on a more phased approach.

4. Impact to trade

A large number of comments related to insufficient trade in Derby to warrant the costs of purchasing a vehicle and some drivers would simply leave. Others were concerned that this could lead to some drivers being able to earn a living and forcing them into unemployment. Other themes that emerged were: timescale too short, concerns, the current enforcement was enough and twice yearly vehicle checks.

Figure 7: Measures to improve technology –100 most common words



Base: 269 trade respondents, 237 non-trade respondents

5.8.5 Of the 206 respondents that selected 'other' and left a comment, 135 said 5 years would be an appropriate timescale. There was some variance however in terms of the 5 year timescale: *"up to 5 years"*, *"minimum of 5 years"* and *"5 years plus"*. There were also a number of different reasons given as to why this timeframe would be more appropriate: *"5 years to save up"*, *"5 years to obtain credit"*, *"5 years to get the best car they can get"*, *"5 years as we were given 5 years to change colour"*.

5.8.6 The next most popular timeframe identified was 3 years with 23 responses.

5.9 Feedback on ideas, suggestions or additional comments on the draft Taxi and Private Hire Vehicle Strategy 2020

5.9.1 Comments, suggestions and ideas regarding the draft Taxi and Private Hire Vehicles Strategy 2020

Consultees were asked if they had any comments, ideas or additional suggestions to the proposed policy. A total of 224 people contributed; the most common themes emerging from these comments were:

1. Age limits

The largest numbers of comments (72) related to the proposed age limits of vehicles. Concern was raised by a number of respondents that ULEV vehicles were costly and that the maximum 10 year age was not sufficient to recover costs from the original outlay. Some concluded that the introduction of age limits could effectively remove a large proportion of the taxi/private hire fleet from Derby and cause owners/drivers to be unemployed. Others suggested alternative age limits or combined the proposed age limits with test frequency (increased to twice a year for older vehicles) and regular maintenance. Emissions were cited by some as more important and more indicative of the vehicle's condition than age alone.

2. Consider affordability to trade

Many strongly urged that the costs involved in purchasing be appreciated. Some stated that whilst not averse to the proposals, more time to enable transition would be appreciated. Some suggested that the Council should source funding to enable owners to upgrade their vehicles and repay over time. 42 comments were made about this.

3. Other suggestions

Many drivers or representatives of the trade suggested that 'retro kits' should be permitted and that new vehicles which are supplied without a spare wheel should be allowed to be licensed. Others suggestions included an area knowledge test for all drivers, different vehicle types that should be permitted and changes to the road infrastructure which would enable greater movement. 42 comments were received.

4. Air quality/Emissions

Linked to the above themes were general concerns about the speed that these proposed changes would be brought in. A number of people stated that there was insufficient forewarning of proposed changes to meet the costs of purchasing a new ULEV vehicle. Others believed that taxis were being unfairly targeted and not solely responsible for the air quality problems in Derby. Some felt that air quality improvements were imperative and the measures did not go far enough. Others suggested ways in which air quality could be improved through taxis switching off ignition rather than engine idling when in ranks. 32 comments related to this.

5. DCC comment

32 comments were made relating to Derby City Council. Comments included suggestions of ranks – new locations and existing, suggested in-house (Council) MOT test facility for all licensed vehicles, taking greater responsibility for the licenses issued and implementing rigorous sanctions. Others believed the speed at which the proposals would be implemented is too quick and that the Council should seek to phase in any changes. Others wanted the Council to be more ambitious whilst others conversely felt that the proposals were interference from the licensing body.

Figure 8: Ideas, suggestions or comments –100 most common words



6. Additional letters and emails

16 consultation responses were also received in letter or email format. Key points included:

- concern about the proposals to define an age limit to licensed vehicles;
- the difficulty in meeting current licensing conditions when a spare tyre is not included in new vehicles,
- concern that the consultation was misleading in respect of spot checks. (The respondent asserted that spot-checks tended to be undertaken on older vehicles (average 10 years old) and that subsequent reporting would lead the general public to believe that all of the fleet is ageing),
- the importance of a reasonable timescale for drivers to implement changes,

Suggestions included:

- changes to regulations from the Council,
- testing on a bi-annual basis only for vehicles over 10 years old,
- financial incentives for drivers,
- black was the preferred colour of Hackney Carriages.

One respondent asked for clarity on the colour of Hackney Carriages in this interim period before a decision from the consultation is made. The respondent was concerned that their newly ordered vehicle would not comply.

DATA (Derby Area Taxi Association) drafted a counter-proposal which included (but not limited to) extended age limits, testing/inspection frequency increased at a dedicated DCC testing station, concern with the immediacy and financial burden of meeting Euro 6 within the given time to implement and counter dates by when changes would be more viable for members of the trade. For completeness the full DATA counter-proposal is included as **Appendix 2**.

6. About those who responded to the survey

- 6.1 A range of different people took part in the consultation. 274 (53.2%) respondents identified themselves as a hackney carriage driver/owner, a private hire driver/owner, a private hire operator or trade representative. Those that represented a trade were from DATA, Derby Hackney Union, Derby Area Taxi Operators Association and the taxi trade – CCTV for licensed vehicles. (Full details of members of the trade available in the Appendix – Data table 2).
- 6.2 The 241 (46.8%) other people that took part identified themselves as either a Derby resident (92.9%), a friend/relation of someone in the trade (2.5%), responding on behalf of a local business/organisation (2.5%) or on behalf of a statutory body (0.4%). 4 people (1.7%) identified themselves as ‘other’, describing themselves as ‘a regular user of Derby Taxis/Private Hire Vehicles’, ‘living near to Derby’ or as ‘a frequent visitor to the city’. Local businesses, organisations or statutory bodies included: Guide Dogs for the Blind Association, Derby Blind, a charity that uses Hackney cabs and a Disability Equality Group member.
- 6.3 This section sets out the demographic details of those that took part in this consultation.

Table 1: Gender

	Number	%
Male	356	83.4
Female	71	16.6

Base: 427 respondents

Table 2: Gender same as assigned at birth

	Number	%
Yes	411	99
No	4	1

Base: 415 respondents

- 6.4 **Age:** All respondents were aged over 13; the age range is set out in Table 3. The average age of respondents was 45.

Table 3: Age

	Number	%
Under 18	1	0.3
18 – 25	15	3.8
26 – 35	70	17.8
36 – 45	120	30.5
46 – 55	102	26
56 – 65	61	15.5
Over 65	24	6.1

Base: 393 respondents

Table 4: Ethnic Group

	Number	%
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White - English / Welsh / Scottish / Northern Irish / British	199	48.4
Any other White background	4	1
Asian or Asian British - Pakistani	150	36.5
Any other ethnic group	9	2.2
Asian or Asian British - Indian	17	4.1
White – Irish	6	1.5
Black or Black British - African	4	1
Dual Heritage - White and Black Caribbean	3	0.7
Dual Heritage - White and Asian	4	1
Any other Asian background	1	0.2
Black or Black British - Caribbean	3	0.7
Other ethnic group – Arab	3	0.7
Asian or Asian British - Bangladeshi	2	0.5
Any other Black background	4	1
White - Gypsy or Irish Traveller	2	0.5

Base: 411 respondents

6.4 Disability: 10.3% of those responding to the consultation consider themselves to be a disabled person.

Table 5: Sexuality

	Number	%
heterosexual/straight	275	70.5
Prefer not to say	80	20.5
a gay man	13	3.3
Other	10	2.6
bisexual	9	2.3
a gay woman/lesbian	3	0.8

Base: 390 respondents

6.5 Religion: Just under half (47.9%) of those that responded have religious beliefs; of those 60.7% are Muslim and 23.9% Christian. Full demographic data tables can be found in Appendix 1.

Appendix 1: Data Tables

Table 1: Are you a hackney carriage driver or owner, a private hire vehicle driver or owner, a private hire operator, or a trade representative?

	No.	%
Yes	274	53.2
No	241	46.8
Total	515	100

Table 2: In what capacity are you taking part in this survey?

	No.	%
As Private Hire driver licensed in Derby	116	N/A
As Hackney Carriage driver licensed in Derby	120	N/A
As Private Hire vehicle owner licensed in Derby	56	N/A
As Hackney Carriage vehicle owner licensed in Derby	70	N/A
As Private Hire operator licensed in Derby	6	N/A
As a trade representative	14	N/A
As a driver, vehicle owner or operator licensed outside of Derby City	8	N/A
Total ***multiple response question, figures do not total 274		

Table 3: In what capacity are you taking part in the survey?

	No.	%
As a Derby resident	222	92.9
As a friend / relation to someone in the trade	6	2.5
On behalf of a local business or organisation	6	2.5
On behalf of a Statutory body	1	0.4
Other	4	1.7
Total	239	100

Table 4: Extent of agreement with aim to improve taxi and PHV through new technology, improving service and safety and modernising the fleet?

	No.	%
Strongly agree	157	30.7
Agree	113	22.1
Neither agree nor disagree	45	8.8
Disagree	61	11.9
Strongly disagree	134	26.2
Don't know	1	0.2
Total	511	100

Table 5: Extent of agreement with changes to existing city centre ranks to prioritise low emission vehicles?		
	No.	%
Strongly agree	120	23.5
Agree	96	18.8
Neither agree nor disagree	35	6.8
Disagree	80	15.7
Strongly disagree	177	34.6
Don't know	3	0.6
Total	511	100

Table 6: Extent of agreement with support of air quality agenda through working with the trade?		
	No.	%
Strongly agree	133	26.4
Agree	220	43.7
Neither agree nor disagree	41	8.1
Disagree	39	7.7
Strongly disagree	67	13.3
Don't know	4	0.8
Total	504	100

Table 7: Extent of agreement with designating taxi ranks within city as ULEV only?		
	No.	%
Strongly agree	112	22.3
Agree	88	17.5
Neither agree nor disagree	27	5.4
Disagree	80	15.9
Strongly disagree	190	37.8
Don't know	6	1.2
Total	503	100

Table 8: Extent of agreement with introduction of back to black and Derby yellow colour policy for newly licensed low emission taxi (HC) vehicle licenses?		
	No.	%
Strongly agree	187	36.8
Agree	140	27.6
Neither agree nor disagree	71	14
Disagree	31	6.1
Strongly disagree	71	14
Don't know	8	1.6
Total	508	100

Table 9: Extent of agreement with review of existing advertising policy for taxi (HC) vehicles?		
	No.	%
Strongly agree	111	22.1
Agree	176	35.1
Neither agree nor disagree	123	24.5
Disagree	24	4.8
Strongly disagree	27	5.4
Don't know	41	8.2
Total	502	100

Table 10: Extent of agreement with policy that all licensed vehicles are zero emission by 2030?		
	No.	%
Strongly agree	114	22.6
Agree	147	29.2
Neither agree nor disagree	45	8.9
Disagree	85	16.9
Strongly disagree	11	2.2
Don't know	2	0.4
Total	504	100

Table 11: Extent of agreement with targets of 25% of taxi (HC) fleet to be ULEV by 2020 and 50% by 2025?		
	No.	%
Strongly agree	97	19.2
Agree	96	19
Neither agree nor disagree	34	6.7
Disagree	102	20.2
Strongly disagree	175	34.6
Don't know	2	0.4
Total	506	100

Table 12: Extent of agreement with targets of 25% of Private Hire (PH) fleet to be ULEV by 2020 and 50% by 2025?		
	No.	%
Strongly agree	96	19
Agree	96	19
Neither agree nor disagree	33	6.5
Disagree	105	20.8
Strongly disagree	169	33.5
Don't know	5	1
Total	504	100

Table 13: Extent of agreement with licenses not issued for petrol/diesel vehicles older than 5 years that do not meet min Euro 6 standard?		
	No.	%
Strongly agree	129	25.3
Agree	72	14.1
Neither agree nor disagree	23	4.5
Disagree	77	15.1
Strongly disagree	207	40.7
Don't know	1	0.2
Total	509	100

Table 14: Extent of agreement with consideration of provision of mandatory eco driving course as part of obtaining licence?		
	No.	%
Strongly agree	100	19.6
Agree	69	13.5
Neither agree nor disagree	48	9.4
Disagree	82	16.1
Strongly disagree	208	40.8
Don't know	3	0.6
Total	510	100

Table 15: Extent of agreement with Council to actively seek funding to incentivise trade to renew and upgrade fleet?		
	No.	%
Strongly agree	210	41.2
Agree	175	34.3
Neither agree nor disagree	44	8.6
Disagree	22	4.3
Strongly disagree	49	9.6
Don't know	10	2
Total	510	100

Table 16: Extent of agreement with consideration to offering vehicle licences at reduced rate for those taking up ULEV for limited period?		
	No.	%
Strongly agree	112	22
Agree	202	39.8
Neither agree nor disagree	80	15.7
Disagree	45	8.9
Strongly disagree	63	12.4
Don't know	6	1.2
Total	508	100

Table 17: Extent of agreement with Council to consider undertaking unmet demand survey in future?		
	No.	%
Strongly agree	169	33.3
Agree	133	26.2
Neither agree nor disagree	102	20.1
Disagree	26	5.1
Strongly disagree	50	9.9
Don't know	27	5.3
Total	507	100

Table 18: Extent of agreement with Council to investigate developing a taxi (HC) ULEV leasing scheme?		
	No.	%
Strongly agree	103	20.4
Agree	184	36.4
Neither agree nor disagree	87	17.2
Disagree	52	10.3
Strongly disagree	67	13.3
Don't know	12	2.4
Total	505	100

Table 19: Extent of agreement with reduction of max age of licensed vehicles to 10 yrs for petrol/diesel and 12 yrs for ULEV (10 yrs for ULEV from 2025)?		
	No.	%
Strongly agree	121	23.9
Agree	79	15.6
Neither agree nor disagree	24	4.7
Disagree	63	12.4
Strongly disagree	209	41.2
Don't know	11	2.2
Total	507	100

Table 20: Extent of agreement with Council working with neighbouring LA's to develop a licensing framework for a licensed vehicles to adhere to?		
	No.	%
Strongly agree	221	43
Agree	179	34.8
Neither agree nor disagree	37	7.2
Disagree	18	3.5
Strongly disagree	50	9.7
Don't know	9	1.8
Total	514	100

Table 21: Extent of agreement with framework to provide Councils the right to enforce against licensed vehicles within boundary that are not adhering to licensing requirements?		
	No.	%
Strongly agree	249	49.1
Agree	150	29.6
Neither agree nor disagree	29	5.7
Disagree	24	4.7
Strongly disagree	48	9.5
Don't know	7	1.4
Total	507	100

Table 22: Extent of agreement with developing a code of conduct of expected standards of driver and customer behaviour?		
	No.	%
Strongly agree	156	30.5
Agree	232	45.3
Neither agree nor disagree	49	9.6
Disagree	22	4.3
Strongly disagree	49	9.6
Don't know	4	0.8
Total	512	100

Table 23: Extent of agreement with Council to consider implementing driver dress code?		
	No.	%
Strongly agree	82	16.1
Agree	82	16.1
Neither agree nor disagree	74	14.5
Disagree	108	21.2
Strongly disagree	160	31.4
Don't know	4	0.8
Total	510	100

Table 24: Extent of agreement with requirement of large photographic name badge in vehicle?		
	No.	%
Strongly agree	131	25.6
Agree	102	19.9
Neither agree nor disagree	35	6.8
Disagree	81	15.8
Strongly disagree	160	31.3
Don't know	3	0.6
Total	512	100

Table 25: Extent of agreement with improved signage in vehicle providing better information for passengers and aid drivers?		
	No.	%
Strongly agree	123	24.1
Agree	130	25.5
Neither agree nor disagree	77	15.1
Disagree	59	11.6
Strongly disagree	118	23.1
Don't know	3	0.6
Total	510	100

Table 26: Extent of agreement with complaints number and customer feedback email address displayed clearly in all vehicles?		
	No.	%
Strongly agree	119	23.4
Agree	150	29.5
Neither agree nor disagree	70	13.8
Disagree	50	9.8
Strongly disagree	118	23.2
Don't know	2	0.4
Total	509	100

Table 27: Extent of agreement with driver excellence award to recognise outstanding customer service to disabled and elderly passengers?		
	No.	%
Strongly agree	156	30.5
Agree	202	39.5
Neither agree nor disagree	68	13.3
Disagree	37	7.2
Strongly disagree	44	8.6
Don't know	4	0.8
Total	511	100

Table 28: Extent of agreement with a series of taxi (HC) private hire (TPH) campaigns around disability awareness?		
	No.	%
Strongly agree	124	24.3
Agree	178	34.9
Neither agree nor disagree	81	15.9
Disagree	54	10.6
Strongly disagree	63	12.4
Don't know	10	2
Total	510	100

Table 29: Extent of agreement with Council to ensure all new drivers pass English test before licence granted?		
	No.	%
Strongly agree	218	43
Agree	192	37.9
Neither agree nor disagree	31	6.1
Disagree	15	3
Strongly disagree	49	9.7
Don't know	2	0.4
Total	507	100

Table 30: Extent of agreement with review of existing safeguarding training and consider introduction of refresher training at periodic intervals?		
	No.	%
Strongly agree	124	24.5
Agree	111	21.9
Neither agree nor disagree	47	9.3
Disagree	83	16.4
Strongly disagree	138	27.2
Don't know	4	0.8
Total	507	100

Table 31: Extent of agreement with driver and vehicle identification to be improved through driver display cards?		
	No.	%
Strongly agree	129	25.3
Agree	111	21.8
Neither agree nor disagree	52	10.2
Disagree	72	14.1
Strongly disagree	143	28.1
Don't know	2	0.4
Total	509	100

Table 32: Extent of agreement with working with licensed business to improve operational safeguarding practices		
	No.	%
Strongly agree	130	25.6
Agree	171	33.7
Neither agree nor disagree	83	16.4
Disagree	54	10.7
Strongly disagree	60	11.8
Don't know	9	1.8
Total	507	100

Table 33: Extent of agreement with working with the Police, University, Derby Live and the BIDS to launch a TPH safety awareness campaign?

	No.	%
Strongly agree	155	30.6
Agree	213	42.1
Neither agree nor disagree	65	12.8
Disagree	28	5.5
Strongly disagree	38	7.5
Don't know	7	1.4
Total	506	100

Table 34: Extent of agreement with Council co-developing and launching a taxi (HC) booking app to aid passenger safety, cashless payment and operator quality rating system to improve standards?

	No.	%
Strongly agree	107	20.9
Agree	173	33.9
Neither agree nor disagree	84	16.4
Disagree	60	11.7
Strongly disagree	83	16.2
Don't know	4	0.8
Total	511	100

Table 35: Extent of agreement with incentives for drivers regularly receiving high quality ratings from customers?

	No.	%
Strongly agree	108	21.3
Agree	194	38.3
Neither agree nor disagree	85	16.8
Disagree	47	9.3
Strongly disagree	64	12.6
Don't know	9	1.8
Total	507	100

Table 36: Extent of agreement with a TPH e-newsletter to improve communication between the City Council and the trade?

	No.	%
Strongly agree	93	18.2
Agree	186	36.5
Neither agree nor disagree	108	21.2
Disagree	49	9.6
Strongly disagree	66	12.9
Don't know	8	1.6
Total	510	100

Table 37: Extent of agreement with review of card (contactless) payment made available in every taxi (HC) as alternative to cash?		
	No.	%
Strongly agree	164	32.3
Agree	173	34.1
Neither agree nor disagree	80	15.8
Disagree	30	5.9
Strongly disagree	53	10.5
Don't know	7	1.4
Total	507	100

Table 38: Extent of agreement with taxis (HC) provided with free (to driver and passenger) in cab Wi-Fi through 3rd party supplier?		
	No.	%
Strongly agree	83	16.3
Agree	100	19.6
Neither agree nor disagree	106	20.8
Disagree	84	16.5
Strongly disagree	127	24.9
Don't know	10	2
Total	510	100

Table 39: Do you agree/disagree with proposed introduction of age and emission limits to the taxi (HC) and private hire vehicle licensing process?		
	No.	%
Agree	219	42.7
Disagree	276	53.8
Don't know	18	3.5
Total	513	100

Table 40: If the proposed age and emissions limits were introduced, what do you think would be an appropriate timescale?		
	No.	%
Less than 12 months	31	6.1
12 months	56	11.1
18 months	47	9.3
2 years	153	30.2
Other	219	43.3
Total	506	100

Equalities

Table 41: Are you...

	No.	%
Male?	356	83.4
Female?	71	16.6
Total	427	100

Table 42: Is your gender the same as you were assigned at birth?

	No.	%
Yes	411	99
No	4	1
Total	415	100

Table 43: what was your age on your last birthday?

	No.	%
Under 18	1	0.3
18-25	15	3.8
26-35	70	17.8
36-45	120	30.5
46-55	102	26
56-65	61	15.5
Over 65	24	6.1
Total	393	100

Table 44: To which group do you consider you belong?

	No.	%
Asian or Asian British - Indian	17	4.1
Asian or Asian British - Pakistani	150	36.5
Asian or Asian British - Bangladeshi	2	0.5
Any other Asian background	1	0.2
Black or Black British - African	4	1
Black or Black British - Caribbean	3	0.7
Any other Black background	4	1
Dual Heritage - white and black Caribbean	3	0.7
Dual Heritage - white and Asian	4	1
White - English/Welsh/Scottish/N. Irish/British	199	48.4
White - Irish	6	1.5
White - Gypsy or Irish traveller	2	0.5
Any other white background	4	1
Other ethnic group - Arab	3	0.7
Any other ethnic group	9	2.2
Total	411	100

Table 45: Do you consider yourself to be a disabled person?		
	No.	%
Yes	43	10.3
No	373	89.7
Total	416	100

Table 46: I consider myself to be...		
	No.	%
heterosexual/straight	275	70.5
bisexual	9	2.3
a gay man	13	3.3
a gay woman/lesbian	3	0.8
Other	10	2.6
Prefer not to say	80	20.5
Total	390	100

Table 47: Do you have any religious beliefs?		
	No.	%
Yes	202	47.9
No	133	31.5
Prefer not to say	87	20.6
Total	422	100

Table 48: To which religion do you belong?		
	No.	%
Christian	48	23.9
Jewish	1	0.5
Muslim	122	60.7
Sikh	12	6
Other	5	2.5
Prefer not to say	13	6.5
Total	201	100



**HACKNEY CARRIAGE AND PRIVATE HIRE
VEHICLE AGE AND SPECIFICATION
COUNTER PROPOSAL
FROM
DERBY AREA TAXI ASSOCIATION**

**COUNTER PROPOSALS FOR HACKNEY CARRIAGE AND PRIVATE HIRE VEHICLES ON
AGE EMISSIONS AND OTHER SPECIFICATIONS FROM DERBY AREA
TAXI ASSOCIATION**

DATE 9TH MAY 2019

Dear Councilors / Licensing Officers.

After having completed the online and hard copies of the consultation paper, On behalf of our members after a long and lengthy discussion with remainder of both Hackney and the Private Hire trade we have felt the urgent need to put forward counter proposals.

The paper based and online consultation doesn't give us the stakeholders sufficient space and input that we need to address this very important and severely financial impacting policy which is to be implemented in the near future.

This can only be addressed in depth by a long lengthy argumentative email with very good counter proposals with hard evidence and facts which will suit both sides hence this email.

Therefore we have addressed the issues in full depth below and would very much appreciate that these along with the data collected from the consultation process be discussed and considered very seriously before the licensing committee makes a final decision.

Also we would like to hold an open meeting with a few selected drivers and the DATA management committee members, where we invite all the licensing committee members to attend a Q&A and hear the serious consequences this policy will have and ask any further questions arising from both sides. We propose to have this meeting as soon as possible regarding this policy implementation, (Recommendation Monday June 3rd) TBC.

1. From 01/01/2026 any vehicle being licensed for the first time as a Hackney Carriage will be required to be Euro 6 emission standard.

Points to be noted, The taxi trade needs a five year transitional period to move forward with this major overhaul of the taxi trade in Derby, which we believe is a very reasonable time scale for the proprietors to move over to the newer vehicles without causing any financial hardship to them and those that have recently invested in newer vehicles with outstanding finance.

Richard Antcliff suggested at the workshop that they should sell the vehicles. This is not possible the reason being most finance deals don't allow vehicles to be sold during a finance period, Secondly once a vehicle has been a taxi it loses a considerable amount of value.

If the draft policy proposals were to be implemented on the 01/01/2020 100% of the Hackney Fleet will be rendered obsolete due to Euro 6 emission standards, This will have a detrimental effect on the proprietors livelihoods denying them the right to earn a living, along with all service users not having any vehicles with wheelchair facilities (school run contracts and disable users) and the general public within the vicinity of the town Centre along with week end revelers having no form of Public Hire Transport at all for a considerable length of time.

As elected councilors and Public Servant (Officers from the Taxi Licensing Department) of the local authority is this acceptable to be implemented in a such a short time scale...?

Surely this from a legal point of view is totally unreasonable and open to legal challenges.

The best way forward which has been discussed among our members and the remainder of the taxi trade would be to have a minimum upper age limit of 15 years from first registration of DVLA for current, replacement and any new vehicles to be licensed with a cutoff point of 01/01/2026 for Euro 5 vehicles.

This will have a significant impact on the CAZ policy which Derby City Council has to implement. This counter proposal will remove the older Hackney Fleet vehicles.

Hence drivers will have to upgrade to newer vehicles to meet the Euro 5 standards (Most of the Euro 5 vehicles came into production from 2011/2012 onwards) this will also allow drivers to buy secondhand vehicles with Euro 5 emission standards which are currently available on the market within their reach of financial needs and will not put them out of jobs and place financial hardship on them by implementing Euro 6 from 01/01/2020.

May we also remind you that if this above proposal was not to be approved then proprietors will and some already have looked at licensing their older vehicles from neighboring authorities which will have a detrimental effect on the taxi licensing authority and the general public as there will be no enforcement or control over cross border licensed vehicles. Also there is a very high possibility of the taxi licensing department being scaled down with fewer staff members as there will be very few Derby licensed drivers being licensed in derby.

We are not against the age limits or emissions policy implementation we both need to work to an amicable agreement which we believe the above is in the interest of both parties.

As you can see a good percentage of the Hackney taxi fleet of Derby will be upgraded and all the older vehicles which are not Euro 5 compliance and older than 15 years will be taken out of service from 1/1/2020.

This will lead to lower emissions for Derby City Council and a newer taxi fleet to meet the standards of the taxi licensing along with more safer and cleaner vehicles in the interest of public safety which is of paramount issue to the service users and proprietors.

Derby's taxi trade are not the major polluters of the City, in fact only a very small percentage, The taxi trade has a very minimal contribution towards this it's around 0.3% of the overall contribution, Let's be fair and make all those who contribute to high emissions pay the price to balance the situation equally not just penalizing the taxi trade of Derby. Taxi drivers are not big businesses who can easily soak up these extra costs we are talking self-employed sole traders and the councils proposals will finish a lot of the trade off.

Until proprietors have accumulated funds by saving or from extra jobs or finance packages to purchase these Euro 6 and Electrical vehicles. The Chair along with officers and councilors have to take into consideration the financial impact on proprietors plus massive disruption to the general public and service users this 01/01/2020 deadline will have, and in any policy implementation there has to be a reasonable amount of transitional period given to those been affected by the policy.

Also the manufacturers of Euro 6 vehicles will not be able to supply the demand of nearly 275 Hackney Vehicles if all were to replace with Euro 6 vehicles on the set date, approximate delivery time for vehicle production is 12 weeks from order to delivery.

One other point that must be noted is that the Hackney's do not have the vast pool of second hand and new vehicles available to them currently. There is very limited amount because most Hackney's were made last half of 2016 and in 2017 onwards in Euro 6. Very few drivers have purchased these vehicles and will not be selling them back for the second hand market.

This then brings us to our previous point about not enough vehicles being available to the Hackney trade, and not everyone is in a position to buy brand new vehicles. This is why the five year transitional period is must for those wishing to purchase second hand Euro 6 vehicles. In that time scale second hand vehicles will be on the market for those wishing to buy used vehicles for a short length of time with the upper age limits in place.

The five year transitional period will see a gradual upgrade of the fleet with no difficulties to service users and proprietors which I believe is in the best interest for the proprietors and council.

May we also remind the Councilors and Licensing Officers that the Hackney trade when the Yellow colour policy was implemented in 2001 the councilors took into consideration the financial impact (between £1000/£2000 for respray) it would have on the Hackney trade and allowed us 5 years from implementation

date to change over, this emissions and age limits are a far far bigger financial impact on the trade £34,000 to £60,000 so looking at these figures the same principles should be applied.

Implementing the current date would cause unemployment to a good percentage of Hackney proprietors and Private Hire Proprietor, We believe this would be open to legal challenges which we believe the proprietors have very valid grounds to challenge this in the courts due the short timescale presented to the trade and all the above points we have raised. Which looking from the outset will be in the trades favour and any judge presiding will rule in their favour.

Derby Taxi proprietors cannot be made scapegoats we are perfectly within our rights to ask for the five year transitional period which drivers all have a right to ask for. The transitional period is a must in this major overhaul and the PH and Hackney remains united on this issue there has to be a compromise from the trade on this point to the sitting councilors on licensing committee along with corporate officers and Derby legal departments at our earliest opportunity.

2. From 01/01/2030 any vehicle being licensed for the first time as a Hackney Carriage will be required to be a Zero Emissions Capable (ZEC) or Ultra Low Emissions Vehicle (ULEV).

Points to be noted.. Our reason for the the extension on this date from 01/01/2025 is as follows currently there is only one vehicle which meets (ULEV) standards and is priced at £62,000 (without government grants) which at the taxi workshop Richard Antcliff pointed out it has a fuel saving of £100.00 per week which is just figures we believe from manufacturers and not what the proprietors have been saying on all the social media taxi groups. We also have to take into fact the cost of charging on electricity which so far we have had no true figures for so the £100.00 is not true reflection as Richard pointed out.

Currently there is only the TXe. Possible alternatives such as Nissan's Dynamo and a ZEC Vito taxi are apparently still in the pipeline, with the Dynamo said to be significantly cheaper than the TXe. While the development of alternative models is out of City Councils hands, it is important that City Council does what it can to encourage the creation of a range of options and alternative electric vehicles available to stakeholders.

The reliability of the TXe vehicle has been atrocious and proprietors have faced major problems and the reviews have been very negative. This has led to potential buyers deciding not to purchase the vehicle as it is still in development stages for further scope to be improved hence one of the reason for extension on council deadline.

Secondly the astronomical price is beyond the reach of proprietors to purchase this vehicle and run their business in a viable way.

Thirdly there is very little infrastructure in place in local cities and along the whole of the country in terms of charging points which will lead to a loss of potential incomes for proprietors and here in derby 80% of drivers live in terraced house where there is no potential for in house charging points which in our opinion is a major setback for (ULEV and ZEC) Vehicles for the taxi industry and will need quite considerable time to address and rectify.

It is essential that the number of rapid charging points in Derby, particularly those dedicated for use by taxis, matches the demand. Otherwise efforts to move to a zero emissions fleet could be seriously undermined.

By 2030 major improvements in infrastructure and vehicles reliability and availability will have taken place and this will lead to more proprietors been in a better position to buy these vehicles.

3. From 01/01/2041 no vehicle shall be licensed as a Hackney Carriage or Private Hire unless it's Zero Emission Capable (ZEC) Ultra Low Emissions Vehicle (ULEV).

Points to be noted. Reason for this date is as follows with the council bringing in age restrictions on licensed vehicles this deadline gives all those who purchased a Euro 6 vehicle in or around the transitional period the full 15 years life span. Which the taxi trade believes is a fair age for running a viable business with the large investment in purchasing these vehicles, anything below this upper age limit wouldn't make the business viable.

Most proprietors will be taking on some kind of financial package or lease agreements which will be over 5/8 year terms to make repayments affordable to run the business. As one can see the remainder of the 7 years will be when proprietors will see some kind of return from the business investment.

- All Hackney Carriage Vehicles will be subject to one 12 months inspection carried out by an approved Derby City Council testing station.
- **Points to be noted..** There is no need for bi annual testing on new vehicles and cannot be justified causing more financial hardship to proprietors. Under section 50 of the Miscellaneous Provisions Act of 1976 the council have powers to inspect vehicles up to three times a year (Random Spot Checks) which duly should be carried out to ascertain the conditions of the vehicles along with Testing stations to see a consistently of high standards set by the council across all testing stations.
- Alternatively once the vehicle has reached 10 years from first DVLA registration then bi annual testing should be carried out.
- Hackney Carriages vehicles over the age of FIFTEEN (15) years from the date of first DVLA registration will ordinarily be REFUSED a license.
- **Point to be noted..** The council when deciding on upper age limits has to be reasonable and justify their age limits. The suggested 10 years cannot be justified when the major overhaul of the taxi trade in Derby demands we buy vehicle of Euro 6, ZEC and ULEV which were first produced in the year 2016/2017 with the cheapest model costing £34,000 and ULEV costing £62,000 as we have already mentioned in our previous points most of the proprietors will be taking on financial packages with 5/8 years repayment terms so as one can see the first half of the 15 years will be trying to pay off the finance and only then will proprietors be able to recoup their investment in the latter 7 years. So as authority who should be looking at the financial impact on proprietors the 15 years age limit is a very reasonable demand from the Hackney trade.
- From the DATE OF POLICY APPROVAL all newly licensed Euro 6 Diesel or ZEC ULEV Hackney Carriage Vehicles must have all their exterior bodywork finished in the approved manufacturers BLACK paintwork colour, with a Derby coat of arms fixed in the Centre of both front doors with a diagonal yellow 3/4 inch vinyl strip running from one corner of the door to the other corner.
- This model can be seen displayed on the saloon Hackney Carriages of Bradford.
- **Points to be noted...** The livery should be kept very basic one colour keeps the vehicle looking smart... the coat of arms enhances this and the plate number can be positioned under the coat of arms keeping the aesthetics clean clear and simple without clutter. An extra colour on the bonnet distracts from this and only adds unnecessary additional costs for the proprietors. There are no extra safety features to the public from this proposal.
- Arguments will be sought due to the visually impaired finding it difficult to differentiate the Hackney Vehicles from ordinary vehicles. Can the council kindly inform us how many visually impaired people currently reside in Derby and what statistics or data do we have to date on them using a Hackney Vehicle...? From 2001 when the colour policy was introduced due to the visually impaired people we can kindly inform you that most of the visually impaired people when travelling to a destination from their residential address will use Private Hire vehicles because Hackney's are only available from City Centre Ranks unless the customer demands a Hackney vehicle which is unlikely, We can kindly inform the officers chair and councilors that when visually impaired people are out shopping in the city Centre, they either have carer's or family with them who always help them to the Hackney Vehicles so the colour coding of Hackney just for them cannot be justified. So we would urge all members to take our points on board when making the decision on colour choice.
- Provision of mandatory eco driving course as part of obtaining a licence will be considered
- **Point to be noted..** This course will be irrelevant at this stage because the intake of ZEC and ULEV vehicles will be very low due to the astronomical purchase price and reliability of the vehicles. When the

fleet is fully ZEC and ULEV in the near future then we can possibly look at these courses, most drivers will be looking at purchase the cheaper Euro 6 vehicles this time round.

- At some point in the future the Council will consider undertaking an unmet demand survey.
- **Point to be noted..** This is a must as Richard Antcliff pointed out in his report to the licensing committee that more needs to be done to improve the work for the struggling Hackney trade the income has been saturated with the influx of cross border Private Hire and Hackney's. So this survey is a must to stabilise the current fleet to maintain a good standard of earning for the proprietors in the Hackney trade.
- There will be a requirement of large photographic name badge to be present in the vehicle to make driver identification easier.
- **Point to be noted...** This is an absurd suggestion which beggars belief why do we need this when we have badges for identification purposes.
- Also driver details have to be protected and by advertising these with photo identity and further details this could lead to abuse and the safety of the drivers/ proprietors.
- Also all drivers information should comply with GDPR so by introducing these measures are the local authority breaking the GDPR regulation..?

We believe the five year transitional period is the best way forward for both parties involved and allowing Euro 5 vehicles to be licensed up to 01/01/2025 is the way forward to upgrade the current and new licences to be issued from 01/01/2020.

This does not cause any financial hardship on existing and new proprietors wishing to come into the taxi trade. Euro 5 vehicles are currently available in the second hand markets, which are in the affordable reaches of all in the taxi trade in Derby.

We have had meetings with a local law firm and spoken to a solicitor with specialist licensing law knowledge and been informed that there are serious questions which needs to be addressed as regards to the implementation date and transitional period.

We also will be instructing a council to further advise us on a possible Judicial Review if we cannot agree to the five year transitional period with the hard facts we have provided in our email to yourselves and the Corporate Officers and the current policy was to be implemented.

Which we believe is not in the best interest of both parties involved.

We are more than happy to sit down and work along with all involved into coming to an amicable agreement which both suits the trade and council. We request our counter proposals be presented to all 15 councilors on the taxi licence committee and be taken in to consideration when deciding on any new policies that are to be implemented.

We look forward to your response as soon as possible

Kind Regards

Ian Wigley

Chairman of DATA

SUMMARY OF COUNTER PROPOSAL FOR PRIVATE HIRE AND HACKNEY CARRIAGE VEHICLE AGE EMISSIONS AND SPECIFICATIONS

PRIVATE HIRE VEHICLES

FROM 01/01/2020

1. Private Hire Vehicles will be subject to SIX (6) monthly inspections once the vehicle has reached **10** years old from the date of first DVLA registration. The test should be carried out by an approved Derby City Council testing station.

This proposal will improve the overall safety of older vehicles that have reached 10 years of age. Bi annual testing these vehicles will no doubt make vehicles not only safer but also keep the proprietors on their toes knowing their vehicles will be subject to more frequent testing. Setting the implementation for 01/01/2020 will see safety standards improve in a short time span, but will also give the council and testing stations enough time to put infrastructure in place for extra testing.

FROM 01/01/2025

1. Only Private Hire Vehicles that are no older than **10** years old or less from first DVLA registration will be considered for first licensing or as a replacement vehicle.
2. Private Hire Vehicles over the age of fifteen (**15**) years from the date of first DVLA registration will be ordinary be refused a licence **UNLESS** the vehicle is in exceptionally good road worthy condition and be approved for use following an Exceptional Condition Vehicle check carried out by an authorised officer.

This proposal will improve the overall condition of private hire vehicles being licensed for private hire use, having a lower age of 10 years will also give drivers more options of vehicles available without the financial burden of the council's proposal of vehicles only being licensed less than 5 years on first licence. We would also like to bring to the attention of the council, while most of the trade is in favour of some sort of age restrictions. The council proposal is completely unacceptable to the trade and we feel this proposal would be a far better option not only for drivers but also customers bearing in mind the fares will remain relatively the same. Setting the upper age limit of 15 years we feel is more in line with other authorities. We would like to point out there are currently 103 councils in the UK who like Derby have no age restrictions at all, so we ask all councilors voting on age restrictions please don't think Derby is out of the ordinary by not having age restrictions as you may have been lead to believe, A full list of every council in the country can be provided on request stipulating any age restrictions.

HACKNEY CARRIAGE VEHICLES

FROM 01/01/2020

1. **Hackney Carriage** Vehicles will be subject to SIX (6) monthly inspections once the vehicle has reached **10** years old from the date of first DVLA registration. The test should be carried out by an approved Derby City Council testing station.

This proposal will improve the overall safety of older vehicles that have reached 10 years of age. Bi annual testing these vehicles will no doubt make vehicles not only safer but also keep the proprietors on their toes knowing their vehicles will be subject to more frequent testing. Setting the implementation for 01/01/2020 will see safety standards improve in a short time span, but will also give the council and testing stations enough time to put infrastructure in place for extra testing.

FROM 01/01/2020

1. Hackney Carriages being licensed for the first time or as a replacement vehicle must meet a minimum Euro 5 emissions standards or will be ordinarily REFUSED unless the vehicle to be licensed is newer than the existing vehicle and is no more than TEN (10) years age from the date of first DVLA registration.
2. Hackney Carriage Vehicles over the age of fifteen (**15**) years from the date of first DVLA registration will be ordinary be REFUSED a licence.

This will have a significant impact on the CAZ policy which Derby City Council has to implement. Vehicles over 15 years old will have to upgrade to newer vehicles to meet the Euro 5 emissions standards (Most of the Euro 5 vehicles came into production from the year 2011/2012 onwards). This will also allow drivers to buy secondhand vehicles with Euro 5 emissions standards. Which are currently available on the market within their reach of financial needs, and will not put them out of jobs and place financial hardship on them by implementing Euro 6 from 01/01/2020.

3. All newly licensed **Euro 5 and Euro 6 or ZEC/ULEV** Hackney Carriage must have their all exterior bodywork finished in the approved manufacturers Black paintwork.
4. All newly licensed **Euro 5 and Euro 6 or ZEC/ULEV** Hackney Carriage must have the approved Derby City Council Coat of Arms transfer fixed to the Centre of each front door with a diagonal 3/4 inch Yellow Strip.

FROM 01/01/2026

1. All Hackney Carriage Vehicles will be required to be a minimum of **Euro 6 Diesel or ZEC/ ULEV..**
ZEC/ULEV DEFINITION- Emit up to 50g/km CO2 with a minimum of 30 miles emissions range.
A ZEC Hackney Carriage MUST be petrol if an internal combustion engine is used.