

## Appendix 4: The email responses received together with comments from Licensing Services

No	Respondent	Response	Comments
1	Cllr Mike Currah	I would like to give some feedback on the changes proposed. In terms of the vehicle emissions changes, I think that given the current cost of living crisis, which is likely to worsen in the Autumn, that we should [not] be increasing costs for taxi drivers and taxi businesses. Therefore, I would propose that the changes in vehicle standards should be postponed for at least a year, to avoid any increase in costs at this time.	Cllr Currah proposes postponement of vehicle emission standards in policy for economic reasons
2	Respondent	Hello, in response to the proposal for renewal applications, I would like to mention that if I apply for a renewal of my vehicle after January 2024, I would Not be able to work for the final year which would lead to my retirement. This proposal would force me into buying a vehicle and not give me sufficient time to pay for it in 1 year	Respondent concerned about economic effect of proposed emission standards i.e., having to change his car to meet new standards close to his planned retirement.
3	Respondent	As the authorities are stimulating acquisition of vehicles manufactured to the emissions standard "EURO 6" or higher, a nice incentive would be helping taxi drivers to buy new vehicles! Just to clarify it better on a practical example, Brazilian taxi drivers pay only 70% for new vehicles and the remaining 30% the government release to improve that kind of public fleet. Summarising: More financial government investment, more new cars on streets, environment pleased for less bad fuel emissions, more taxi drivers glad and, even more important, more bliss costumers on their comfortable and safe journeys!	Respondent proposing financial assistance for licence holders to buy newer, replacement vehicles to meet new emission standards.
4	Respondent	After reading the changes to policy I agree with euro standards and removal of private hire locality test we need more drivers as there is a shortage of new ones. The driver improvement scheme I am not so much in favour of unless it applies to all council employees as well, while we carry passengers surely all drivers have a responsibility drive safely at all times. Safeguarding and disability training are a necessity. Everything else is ok.	Respondent generally happy with proposals however thinks a driver improvement scheme should apply to council workers as well. Noted however, the policy would only apply to those licensed to own, drive and operate licensed vehicles.

5	Respondent	<p>HC/PH changes. - I have no comment to make other than the current service provided by licensing falls way below what it should be.</p> <p>Disabled persons Act - For the last 40 years or so I have provided as good a service as possible to any disabled person or assistance dog user, I have never refused to carry any person in this category. However over the last few years there has been a sharp increase in the use of battery powered wheelchairs and mobility scooters. In the main these are extremely heavy and usually require a level of dismantling to get them into the vehicle, this is sometimes impossible as you are invariably alone and obviously the passenger is unable to assist. Trying to lift a 50 kilo power chair into a car boot is not good practice. Damage could be done to both the chair / scooter , your vehicle and to the driver. There is also the chance of a battery leakage. We should not be required to man handle this type of equipment.</p>	<p>Respondent complaining about the heavier, more cumbersome wheelchairs. Points noted. Wheelchair access and drivers' responsibilities are subject to guidance and legislative controls.</p>
6	Respondent	<p>Is the council going to make a one tier system with these new changes? As you know private hire cannot pick up or drop off in a taxi rank even with a booked customer. Where is the safety of our customers considered, not only disabled ones? Equality covers members of the public.</p>	<p>Respondent appears to ask if DCC is going to remove the legal differentiations concerning hackney carriages and private hire. This is beyond our remit and legal capabilities.</p>
7	Respondent	<p>There is no indication the range of Disabilities which are covered by the Disability Awareness Training. Which organisation provides the training? Is the training restricted to Mobility, Visual difficulties? Have a range of Durham County based organisations/individuals been consulted on the content of the training?</p>	<p>Points noted. There are several known providers of disability awareness training. We are developing a list of disability awareness training providers, including bespoke courses and training package for their licensed drivers. These will be evaluated prior to publication.</p>
8	Respondent	<p>Good morning Helen, many thanks for allowing me to attend your meeting on the 5th of July, I found it to be very constructive. Can I formally ask if the powers that be, take into consideration the drivers who are due for retirement in 2026 bearing in mind their vehicles may be Euro 5 compliant. I would like to stress that revocation of these vehicles would not give the drivers time to finance newer euro 6 vehicles and would effectively force people close to retirement out of a job. An extension would be greatly</p>	<p>Respondent's second submission raising his concerns about economic effect of proposed emission standards i.e., having to change his car to meet new standards close to his planned retirement. Noted</p>

		appreciated to allow drivers to retire gracefully and elevate the stress attributed from financing another vehicle.	
9	Respondent	<p>Durham Council seem adamant to make driving in our city impossible or unaffordable, while drivers from outside areas have the freedoms of lesser rules &amp; regulations</p> <p>I feel DCC discriminate Durham owner drivers, which is really inappropriate</p> <p>The trade should be left as it is to carry on without any change !!</p> <p>Changing rules &amp; regulations @ this time, post Covid &amp; War &amp; Fuel &amp; Energy hike is like kicking the trade while its on the floor</p> <p>Where does everyone think all this extra money comes from ?..</p> <p>Until Government make ALL councils have SAME rules on drivers &amp; emissions, I feel DCC need to put their foot on the brakes 🚗🚗</p> <p>Outside drivers will still come into our city regardless &amp; drivers will also just get plated &amp; badged elsewhere &amp; work in Durham as 100s do already !!!</p> <p>Therefore, DCC will lose money not gain</p>	Respondent voicing concerns about changes to emission standards for licensed vehicles under the current economic climate.
10	Respondent	<p>I am writing this letter to comment on the recent policy changes, requiring that commercial vehicles used in transport operations with Euro 4 engines are to be replaced with vehicles using Euro 6 engines from 1st January 2023 onward. Please consider this letter on behalf of my business, as well as other small businesses within the local constituency.</p> <p>A direct quote in an article from MPs published by the Department for Business Innovation &amp; Skills is that “Small businesses are vital to the UK economy” and that “The Government is committed to creating the right long-term environment to help many more people start and grow their enterprise.”</p> <p>We are a small, local business with 4 vehicles, two of them recently purchased as replacements for old vehicles – of which we will soon be required to replace again due to policy changes. As I’m sure you can appreciate, purchasing, maintaining and operating good-quality vehicles is not an easy feat, nor is it an inexpensive activity.</p>	Respondent voicing concerns about changes to emission standards for licensed vehicles under the current economic climate. Seeking delay in implementation of proposals regarding emission standards for existing vehicles

		<p>The policy changes set to be implemented in Q1 2023 will no doubt force us and many other small, local businesses to potentially needlessly purchase very expensive vehicles in finance agreements – this paired with the current financial squeeze that everybody is undergoing will undoubtedly lead to failure and foreclosure of many businesses such as ours.</p> <p>This letter is not a request to allow concessions to the policy, nor to prevent it, but simply to delay it – we need more time. A chance for local economies to bounce back, a chance for the average person to start using small, local businesses again. If the quotes are true on creating an environment to allow small enterprises to endure, a delay in policy changes surely cannot be so drastic. I hope you understand and acknowledge our plea.</p>	
11	Respondent	<p>To whom this may concern Craig Rudman this is Carl Bussey Spennymoor Taxis I'm a bit concerned of the struggle that we are having at the moment trying to find Euro 6 vehicles to go on as a taxi and I think that euro 4 should come off in January 2023 but I think euro 5 should stay on till January 2025 as long as they're abide by the council rules and kept in good condition and well serviced and you could ask them to provide the service records for that extra year which I have no problem doing just that we cannot find any vehicles on Euro 6 at the moment for reasonable price specially 7 seater and 9 seater taxis are very hard to get and I think new drivers coming on should not have to do a locality test and a knowledge test this is making it very hard for us to find drivers and County Hall are struggling covering the contracts at the moment they cannot get no 7 seater and 9 seater to do their contracts as I think they should be left on at the moment just to help County Hall out if you don't believe me please contact them because they are struggling to get people to cover their contracts children to go to schools I hope this will help all the taxi drivers in County Durham and new Ones to thanks Carl Bussey Spennymoor taxis contact number</p>	<p>Respondent voicing concerns about changes to emission standards for licensed vehicles under the current economic climate. Seeking delay in implementation of proposals regarding emission standards for existing vehicles. Also, wanting removal of both knowledge and locality tests for new drivers to make it easier for him to recruit new drivers.</p>

12	Cllr Richard Ormerod	<p>Can the review of the Licensing Policy be used to include a statement about drivers being expected to abide by the rules of the road? In addition, can it specifically deal with the controls and requirements relating to the use of designated taxi ranks and the picking up and setting down of passengers out with the ranks?</p> <p>It would seem to me that there is nothing to lose by this. It wouldn't place any extra burden on the council and surely encouraging people to obey the law has got to be a good thing.</p>	<p>Points noted however, it isn't for licensing policy (or conditions of licence) to replicate/duplicate other laws that already apply. <i>'Operators need to familiarise themselves with the law and ensure they employ suitable work methods to comply with the law and avoid committing licensing offences.'</i> May be reasonably included. Or some similar wording.</p>
13	Respondent	<p>Hi, I think the length of time to get a euro 6 car should be extended as people just don't have the money at present to buy a new vehicle. I do see why it is necessary but maybe extend by another year or see what can be done grants /loans etc .as of changing tests I think the locality should be made easier on hack as well as private hire that's why there are no drivers attempting it thanks Darren</p>	<p>Respondent voicing concerns about changes to emission standards for licensed vehicles under the current economic climate. Seeking delay in implementation of proposals regarding emission standards for existing vehicles.</p>
14	Respondent	<p>Regarding the further consultation on Durham's Taxi Policy, I am urging Councillors to feedback and demand that the 1996 Employment Act is attached as a condition of holding an Operators License with Durham County Council.</p> <p><a href="https://www.legislation.gov.uk/ukpga/1996/18/contents">https://www.legislation.gov.uk/ukpga/1996/18/contents</a></p> <p>Sadly since 2012 and notably since 2017 with Durham County Council, many Private Hire drivers have been misclassified and deprived of various working rights under the 1996 Employment Act via Operator(s) that they were working for.</p> <p>In February 2021 there was a Supreme Court Ruling confirming the misclassification of these drivers under the 1996 Employment Act.</p> <p><a href="https://www.supremecourt.uk/watch/uk-sc-2019-0029/judgment.html">https://www.supremecourt.uk/watch/uk-sc-2019-0029/judgment.html</a></p> <p>Time has ran out for Operator(s) who have been exhausting the Court and Appeals system for the last 8 years - right up to the Supreme Court. The time has come to abide by the Law like everyone else, and to stop denying basic workers rights.</p> <p>Important point for councillors to note - When Operators denied basic workers rights it has allowed loopholes to be created for Operators to avoid VAT.</p>	<p>"The case referred to applied to Uber drivers. Not all private hire operators will be the same so some drivers may be workers, and some may not. It is a matter for the particular company to determine the status of their drivers and a driver can complain to the employment tribunal if they take issue with this. Each operator needs to comply with legislation relevant to their business, but we do not consider that it should be included in the policy that conditions should be attached relating to caselaw which could continue to evolve". Catherine Hazel and Stephen Buston.</p> <p>If a driver wishes to take a complaint to an employment tribunal and is successful, if the operator failed to comply with a ruling, there may be the option/possibility to take the operator to Licensing Committee in connection with their propriety.</p> <p>Like the European Working Hours directive, drivers would have the choice to opt out and maintain their self-employed</p>

		<p>SAFETY OF THE PUBLIC Further element and most importantly to consider is that when drivers are exploited it can lead to the public being put at risk. Im sure most of us are aware of the sweatshop conditions that Uber drivers have been working in, via the media and/or Frank Fields report into it.</p> <p><a href="https://www.politicshome.com/thehouse/article/uber-are-subjecting-workers-to-sweated-labour-for-poverty-pay-in-the-gig-economy">https://www.politicshome.com/thehouse/article/uber-are-subjecting-workers-to-sweated-labour-for-poverty-pay-in-the-gig-economy</a></p> <ol style="list-style-type: none"> <li>1. Maintenance of vehicles will reduce to a lower standard and service intervals will be increased - if drivers aren't even receiving basic minimum wage.</li> <li>2. Drivers will also work longer hours increasing fatigue levels and damaging the wellbeing of workers. Again putting the public at risk.</li> </ol> <p>CONCLUSION It is a 'NO BRAINER' that the 1996 Employment Act is attached as a condition of holding an Operators License. I am very surprised it has not ALREADY been included in the proposed changes as the Department has had almost 18 months since the ruling was handed down. I am not aware or have been supplied of a logical and/or legal reason why it should not be?</p> <p>The next Policy review will not be until 2026 - can we afford another 4 years of a 'race to the bottom' and potentially putting the safety of the public at risk? I urge all elected members not to adopt this policy in its current state unless an acceptable reason has been given not to attach the 1996 Employment Act as a condition of holding an Operator's License, and for relevant elected members not to vote in favour of it.</p>	<p>status, however if any challenges were to be made, this route may be appropriate (unless advised otherwise).</p>
15	Respondent	<p>Could I suggest that we are not forced to carry first aid kits and fire extinguishers within HC and private hire vehicles without adequate training given for their usage. A large part of this training should involve Risk assessment, and PPE.</p>	<p>Points noted.</p>
16	Respondent	<p>After I failed to renew my licence on time some years ago, could I suggest that it would be, in future, any driver failing to renew on time, given that licence back and a fine issued as a penalty for late renewal. This would be a deterrent for late renewal. Drivers</p>	<p>We have no powers to issue fines under this legislation.</p>

		however would Not be entitled to drive until that renewal is processed.	
17	Respondent	Could a Mot be undertaken as the primary objective to the COC. Legistically this is possible. New policy.	Points noted.
18	Respondent	New proposal new policy. This is too much for taxi drivers also very hard time going on, Uber should not working in Durham with Newcastle plate on	Respondent raising concerns about economic impact of proposals. Voices unsubstantiated opinion about Uber.
19	Respondent	I wish to comment on the taxi policy consultation. 1. Vehicle Emission standards Hybrid vehicles should have they license renewed after 1st January 2024. These vehicles are the next best to fully electric vehicles. They are already low emission and environmentally friendly and mostly Zero Road tax. There is no mention of these in the policy. 2. Driver improvement Scheme Should be implemented at 9 points. 3. Safeguarding and disability awareness course should be refreshed every 5 years.	Points noted
20	Respondent	DT and PHA Response	Points noted – see comments in connection with DT and PHA response below
21	Respondent	1) I am sure you will have been getting a lot of comments on the announced euro 6 proposals, particularly from minibus owners. I am in the position of having to replace my minibus now and having searched about i am horrified and dismayed at the prices of suitable second hand Euro 6 minibuses they are in the region of 18k-20k minimum, and im sure other owners are having a similar experience and probably (like myself) wont be replacing theirs. This is going to cause huge logistical problems for Durham home to school transports department with even fewer buses available than there is now. In the past the regulations allowed minibuses to be a euro level down from cars and i propose the council amends the proposals to make Cars euro 6 and minibuses euro 5 once again, this would make it more realistic for us to run. 2) why are the proposals only aimed at the taxi industry?? why dont they apply to psvs and the councils own	Respondent raising concerns about economic impact of proposals.  We can only develop and adopt policies that relate to vehicles that we licence.  Request for tariff increase rests outside policy and is being dealt with via the recognised legal channels  When a licensed vehicle fails a test, despite not being mechanically fit and potentially a public safety issue, the licence remains in place unless and until a suspension notice is issued and for this reason a suspension notice is issued as soon as possible.  When a licence is due to expire the licence holder is written to in advance of the expiry of the licence to remind them that the expiry is imminent and to offer the licence holder the

		<p>transport vehicles?? the word "discrimination" springs to mind</p> <p>3) given the recent oil company profiteering ,why is there no mention of HELP to the taxi industry by way of substantial meter price increases.</p> <p>4) When a vehicle fails its test,a letter is hand delivered to the business address within an hour warning NOT TO USE THE VEHICLE AS A TAXI. Why then ,when a vehicle fails to be re-licensed ,is there not a similar letter sent or delivered to the owner giving a SIMILAR WARNING,after all we are not infallible???</p>	<p>opportunity to renew the licence. After the expiry of the licence they are also sent a letter notifying them that the vehicle licence has expired and must not be used as a licensed vehicle and requesting return of the expired licence plates.</p>
22	Cllr Liz Brown	<p>Dear all, I should like to put forward the following observations as part of this review.</p> <p>1. P27, Appendix 1. Continuing Suitability and Renewal Process. In this age of computer records a reminder could surely be sent to all licence holders before their personal licence is due for renewal rather than holders "normally" receiving a reminder "as a matter of courtesy"</p> <p>2. P37, Appendix 3, 5th Paragraph. Vehicle Licences. Again the weasel words "normally" and "matter of courtesy". Vehicle Licences are computerised. Computers can be programmed to send out reminders automatically.</p> <p>3. P40, Appendix 3, Paragraph 22. Vehicle Licences Re the carrying of a fire extinguisher. I have consulted with the Deputy Chief Fire Officer of Durham about the Fire Brigades advice on car fires. The advice is to get passengers out and as far away from the vehicle as possible and not attempt to fight the fire. My fear is that a "readily accessible" fire extinguisher could be used as a weapon. If a means of fire fighting is deemed necessary then a fire blanket would allow an extra few minutes to get passengers out.</p>	<p>A letter is generally sent 99.9% of the time at least 8 weeks in advance of the expiry of licence. They will also get a reminder email from the DASH system if they did their initial application online.</p> <p>See point 1 above</p> <p>Points noted</p>
23	Respondent	DT and PHA Response	Points noted – see comments in connection with DT and PHA response below.
24	Respondent	DT and PHA Response	Points noted – see comments in connection with DT and PHA response below.

25	Respondent	DT and PHA Response	Points noted – see comments in connection with DT and PHA response below.
26	Respondent	DT and PHA Response	Points noted – see comments in connection with DT and PHA response below.
27	DTPHA TAXIASSOCIATION (DT and PHA Response)	<p>The main problems with the policy are as follows:</p> <p>4.0 Vehicle Emissions and Manufacture Criteria Tackling air pollution is one of several public health priorities aimed at safeguarding the public. To combat poor air quality, innovative and bold measures are being taken across the country to ensure the health and wellbeing in communities as well as road users. Adoption of the following proposed policy requirements will enable? No, it will force! Durham licenced vehicles to help to reduce traffic pollution and improve local air quality in our region:</p> <p>This policy fails on many levels. 75% of Wheel Chair vehicles would need replacing @ up to £50K each about £4,350,000 About 50% of all other vehicles would need replacing @ up to £32K each about £16,576,000 About £20,926,000 austerity from 2010, lockdown and restriction 2020-22 some drivers earning £12 a day at times, for the small and sole traders where is that money coming from? We were not sat at home on pay and expenses, or receiving a generous allowance plus expenses.</p> <p>Retrofitting with the www.Atmos-clear.com type system will make all Euro4 &amp; Euro5 vehicles cleaner than Euro6 for a more reasonable cost to the trade of £277,695. (£459 per vehicle) Considering what has happened this is a more proportionate way forward and complies with 1.2 of the regulators code: 'minimising the costs of compliance for those they regulate';.</p> <p>Already councillors and the public are complaining that there are no taxis in Barnard Castle, Bishop Auckland, Crook and the Wear Valley area, Chester-le-Street area, Newton Aycliffe and the Sedgfield area.</p>	<p>Vehicle emissions and Manufacturing criteria – see options in appendix X.</p> <p>Retrofitting with the www.Atmos-clear.com type system – Respondent raising concerns about economic impact of proposals and offering alternatives for consideration including a delay in implementation and the ability to use pollution control equipment fitted retrospectively to older vehicles. Comments from specialist in this field, Colin Smith, Programme Manager Freight and Clean Vehicle Retrofit – The Energy Saving Trust:</p> <p><i>"With respect to the Atmos-Clear system my previous answer still applies, I do not believe that these hydrogen on demand systems reduce emissions or improve fuel efficiency or in the 15 years at Energy Saving Trust I have not seen an independent test report that demonstrates the claims made by the suppliers of such systems. I suspect it would be quarter of a million wasted fitting these systems. I believe fitting these systems to Euro 4 and 5 cars will not make them cleaner than Euro 6.</i></p> <p><i>Depending on what you are trying to address in terms of emissions, either air pollutants (PM and NO2-) or GHG emissions (climate change) will affect the standards you put in place. Ideally, we should be addressing both and the passenger car solution for that is electric with zero tailpipe air pollutants and if 100% renewable electricity is used to charge the EV then you address the GHG aspect. However, that will be an expensive option for</i></p>

		<p>With this it will get worse putting people in danger from people posing as taxis picking up lone females or students walking home by riverside paths.</p> <p>It also fails as a green policy as it doesn't take those 'dirty vehicles' off the counties roads but puts them in the public's hands.</p> <p>7.6 The Council has the option to suspend or revoke a licence should information be received that causes concern over whether a driver is a fit and proper person. A decision to revoke a licence does not however prevent the reissuing of a licence should further information be received that alters the balance of probability of a decision previously made. A decision to suspend or revoke is based on the evidence available at the time the determination was made. New evidence may, of course, become available later. If, for example, the allegations against a licence holder were, on the balance of probability, considered to be unfounded, or their fitness to drive was proven satisfactory, a suspension could be lifted or, if the licence was revoked, an expedited re-licensing process will be used. We will operate a Fast-Track application process for licence reinstatement following an officer revocation in such cases.</p> <p>If someone is revoked on spec by an officer it could take months to get them back on the road, the delay could take them out of the trade altogether.</p> <p>Suspension can be rescinded in a matter of minutes when the facts have been discovered.</p> <p>8.0 Partnership Working 8.1 The Council will actively engage and seek to work in partnership with the following agencies, groups, and individuals to promote the licensing objectives: This is not "will" but "MUST" in accordance with section 2.1 of the regulators code, this is not optional, it is mandatory for all "regulators" Failure to hold a working group meeting since Dec 2019 proves this to be a joke.</p>	<p><i>taxi drivers and would require investment in charging infrastructure to allow for the range limitations of EVs (although having that data on daily miles driven by taxi drivers in your area would help understand the extent of range limitations).</i></p> <p><i>From an air quality perspective, it looks like your policy doesn't differentiate petrol from diesel, charging CAZ standards are Euro 4 for petrol and Euro 6 for diesel but I guess most taxis will be diesel for the better fuel economy over petrol (although there is less of an advantage if the driving is urban stop start and short journeys). For Durham I expect would be a higher-than-average miles per job than a more city based fleet.</i></p> <p><i>A Euro 4 (introduced in 2005/2006) car will be in the age range 13-16 years A Euro 5 (introduced in 2009/2012 – there was Euro 5a and Euro 5b) 10 – 13 years Dieselnet is a great source of info on emission standards (<a href="https://dieselnet.com/standards/eu/ld.php">https://dieselnet.com/standards/eu/ld.php</a>)</i></p> <p>The availability of taxis in Barnard Castle, Bishop Auckland, Crook and the Wear Valley area, Chester-le-Street area, Newton Aycliffe and the Sedgfield area. – points noted.</p> <p>Revocation and fast-track reinstatement of licences – This requirement stems from the UK National Standards for taxi and private hire licensing. Points and opinions noted however, system has been approved by legal officers. Application would still be required however the application may be fast-tracked through the complete administration process.</p> <p>Partnership Working – points noted, a question of semantics.</p>
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		<p>would increase the number of drivers available for IPT as well as comply with part 4 of the regulators code.</p> <p>Applications for Vehicle, Driver and Operator Licences following a conviction / caution and the ongoing suitability of Licence Holders P38 Where an applicant has 7 or more points on their DVLA driving licence for minor traffic or similar offences, a licence will not be granted until at least five years have elapsed since the completion of any sentence imposed. Every case should be on its individual merits, not prescribed. An HGV or PCV driver carrying over 44 tons or up to 73 people doesn't face this type of sanction, why do Councillors feel the need to add to the already negative view of drivers by saying they are worthy of harsher punishment? The attitude of council and licensing has always been hostile to the trade as the constant attempts to remove them from Durham City, especially over the covid period has shown.</p> <p>Appendix 3: Vehicle Licences Standard Conditions P43 5. Occasional (tip-up) seats must be arranged to rise automatically when not in use. This is a legal claim waiting to happen, while many have flip up seats in the past the number of times a customer has stood up and sat down without checking the seat is still there, just imagine an injury due to council policy?</p> <p>10. The vehicle must prominently display the following: • internal licence plate / complaint sticker on each window so it is clearly visible in all passenger areas My vehicle has 16 window panes. I suggest an amendment to read "must be clearly visible" and NOT to use the suggestive term "complaint" but use comments instead as this is far more acceptable and less subliminal that the only time anyone has anything to say is when they complain! Again this is part of the way licensing frame the way it deals with the trade.</p>	<p>Alex Cummings County Fleet Manager Neighbourhoods and Climate Change Durham County Council</p>
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28	Respondent	<p>I would remind you that we had nearly 2 years were taxis and PHVs were hardly used. A prime example I purchased a EURO 5 compliant vehicle on a 2014 plate in February 2020 with 63k on the clock. It was hardly used during the pandemic until the schools restarted and this new policy if adopted by DCC will force me and many others to purchase another vehicle by Jan 2024? I would also like to ask if DCC want to make all taxis/PHVs EURO 6 compliant by 2024 why do they give so many school contracts to companies using bus/coaches many aged between 12/22 years of age?</p> <p>I would suggest that yes maybe EURO 4 compliant vehicles should be removed by 2024 not 2023 as the policy suggests and EURO 5 within 1 year of when EURO 7 has been introduced to the UK which if still on schedule should be 2025? This at least gives those affected an extra 12 months to prepare for the extra financial restrictions put on them by DCC. It seems our Council may have missed that in the news there is a cost-of-living crisis hitting the UK?</p>	<p>Points noted – contract work lies outside remit of DCC Licensing Services</p> <p>Respondent raising concerns about economic impact of proposals.</p>
29	Respondent	<p>4.0 Vehicle Emissions and Manufacture Criteria</p> <p>Tackling air pollution is one of several public health priorities aimed at safeguarding the public. To combat poor air quality, innovative and bold measures are being taken across the country to ensure the health and</p>	<p>Respondent raising concerns about economic impact of proposals and offering alternatives for consideration including a delay in implementation and the ability to use pollution control equipment fitted retrospectively to older</p>

		<p>wellbeing in communities as well as road users. Adoption of the following proposed policy requirements will enable Durham licenced vehicles to help to reduce traffic pollution and improve local air quality in our region: I am led to believe that at the moment, 75% of Wheelchair access vehicles licensed by DCC only meet Euro 4 or Euro 5 and as such will need replacing.</p> <p>Purchasing wheelchair access vehicles is proving very difficult, new vehicles are requiring a minimum 2 year lead time, though that keep slipping due to the microchip supply issues, and the war in Ukraine impacting the supply chain for steel and wiring harnesses for new vehicles. Second hand vehicles are commanding a price similar to brand new vehicles. To get a reasonable priced wheelchair access vehicle you have to look at pre 2015, which means many are Euro 5.</p> <p>to Euro 6, I mean either Euro 6 or Electric Vehicles)</p> <p>None wheelchair accessible Vehicles. From 1st January 2023, only Euro 6 vehicles will be issued with a new license.</p> <p>From 1st September 2023, no Euro 4 vehicles will be permitted to renew their license and must be replaced with a Euro 6 vehicle.</p> <p>From 1st September 2023, to be able to renew a Euro 5 vehicle it MUST be retrofitted with a fully functioning <a href="http://www.atmos-clear.com">www.atmos-clear.com</a> which is capable of reducing harmful emissions by up to 72%, whilst delivering a 10% decrease in fuel usage. No Atmos-Clear = no renewal.</p> <p>From 1st September 2025, no Euro 5 vehicles will be permitted to renew their licenses and must be replaced with Euro 6 vehicles.</p> <p>From 1st September 2026, All Euro 6 vehicles (not EV) over 4 years of age# be required to be retrofitted with the Atmos-Clear system. (This will ensure the vehicles remain as clean as possible as they age)</p> <p>Wheelchair accessible Vehicles. From 1st January 2023, only Euro 6 vehicles will be issued with a new license, unless the owner is transferring a plate from a Euro 4 accessible vehicle to a Euro 5</p>	<p>vehicles. See also comments in relation to response from DT and PHA response in connection with the retro fitting of emission control equipment</p> <p>See comments in relation to DT and PHA response above.</p>
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		<p>accessible vehicle and is retrofitted with the Atmos-Clear system.  From 1st September 2023, Euro 4 or Euro 5 vehicle may only have licenses renewed if retrofitted with a fully functioning Atmos-Clear System.  From 1st September 2024, Euro 4 accessible vehicles may not be renewed, and may only be replaced with a Euro 6 vehicle.  From 1st September 2026, Euro 5 vehicles may not be renewed and must be replaced with Euro 6 vehicles.  From 1st September 2027, All Euro 6 vehicles (not EV) over 4 years of age# be required to be retrofitted with the Atmos-Clear system. (This will ensure the vehicles remain as clean as possible as they age)  If the above were adopted, it would allow the trade more time to upgrade to Euro 6 engines, whilst still allowing pollution produced by their vehicles to be reduced substantially.  It would also reduce the average drivers fuel bill by 10%. If that reduction is accurate, my own vehicle would cost around £20 per week less to fill, so would recover the cost of installing the system in under 6 months.  # The requirement to install Atmos-Clear to Euro 6 vehicles over 4 years of age is to allow for manufactures warranties to expire, thus avoiding any drivers attempting to claim against the council should a vehicle manufacturer refuse a warranty claim on the basis the vehicle had been modified.  7.6</p> <p>Other comments same as DT and PHA response</p>	
30	Respondent	<p>This policy is designed to decimate owner drivers and small taxi companies.  It could have been written by the big companies as a way of getting rid of the competition.  Following memorable incidents at previous CWWG meetings and recent revelations from the Guardian questions need asking.</p> <p>The policy is a dirty tick box green with no thought about the unintended environmental problems it will cause.</p>	Points noted

		<p>Why would the trade invest 10s of thousands of pounds with the proposed policy? This was put forward by someone with little practical knowledge of the trade and zero knowledge of how business works when looking at large financial investments.</p> <p>It needs to be halted and rewritten working with the trade not against it, as Craig agreed to do at the Dec 2019 CWWG.</p>	
31	Respondent	Please can you provide your full name. DT and PHA Response	See comments in relation to DT and PHA response above.
32	Respondent	I against your new policy this is too much for us Sent from my iPhone	Point noted
33	Respondent	<p>Q; is it your intention to overprice the ability for people to work 🤖🧑🏻♂️</p> <p>No malice intended but it seems humanity has no importance to a draconian elites agenda.</p> <p>I wish you peace, prosperity and a life with love 🙏🌸</p>	Point noted
34	Respondent	DT and PHA Response	See comments in relation to DT and PHA response above.
35	Respondent	DT and PHA Response	See comments in relation to DT and PHA response above.
36	Respondent	DT and PHA Response	See comments in relation to DT and PHA response above.
37	Respondent	<p>15.15 Vehicle licence holders who fail to present their vehicles for test or who reschedule their test for a date which is later than has been scheduled, will have their vehicle licence suspended. Where appointments have been rescheduled for an earlier date and time, no action will be taken.</p> <p>Why should the licence be suspended at that point – the licence has been paid for and should run the full duration of the licence period. Unless it is overdue then the licence should run until the vehicle is tested, regardless of rescheduling, whether earlier OR later. There may be genuine circumstances preventing the attendance to an appointment which are beyond the operators control. In these examples the Certificate of compliance expires on 31st of the month.</p> <p>Example A: Operator books vehicle test for Friday 10th, operator is delayed on holiday due to circumstances beyond their control, eg illness or flight cancellation and</p>	<p>Suspension of vehicles – vehicles licences may be suspended at this point and for that reason because of the risks of defective vehicles not being tested for mechanical fitness and not being presented for testing because the owner knows it will fail the mechanical fitness test, continuing to be driven on the highway as a licensed vehicle.</p> <p>Continuing Suitability and Renewal Process – the driver improvement scheme is designed by experts to assess and support drivers who have e.g. accrued penalty points and who's driving behaviour has been found to be sub-standard and which indicates a continuing inability to comply with highway legislation and which puts members of the travelling public at risk. It is a safeguarding measure and may be used in place of or prior to licence revocation. If a driver is required</p>

		<p>doesn't return home in time to get to that appointment. Can't possibly get there sooner but could reschedule by 27th.. Vehicle is plated and certificate of compliance runs until 31st .</p> <p>That vehicle licence has been paid up to 31st of that month.</p> <p>Example B: : Operator books vehicle test for Friday 10th. Operator experiences a close family bereavement within 48 hours prior to the appointment and is unable to get to that appointment. Could reschedule for 27th . Vehicle is still licenced until 28th.</p> <p>Example C: Operator is an owner driver who contracts Covid within 36 hours of vehicle test.</p> <p>I think there should be some discretion/ compassion shown in cases of exceptional circumstances. It appears that operators are being penalised even when circumstances were beyond their control, and even when the licence plate is still valid and in force.</p> <p><b>Continuing Suitability and Renewal Process</b></p> <p>The ongoing suitability of a licence holder will be monitored. In addition, the following specific checks will be carried out upon renewal, or at any other time deemed necessary by the Council:</p> <p>a) DVLA check</p> <p>b) DBS update service (if a driver is no longer subscribed to the DBS update service at the time of making an application for renewal, they will be required to apply for a new DBS certificate and subscribe to the update service prior to a renewal application being processed and a licence granted)</p> <p>c) Notification of Convictions/Cautions/Arrest/Ongoing or Pending prosecutions or investigations etc. This is to include motoring fixed penalties and antisocial behaviour notices and attendance of any speed awareness courses</p> <p>d) Private hire licence holders must notify the Licensing Authority within 48 hours of their arrest and release, charge or conviction for any sexual offence, any offence involving dishonesty or violence and any</p>	<p>to attend such a scheme and does not want to, they would be at liberty to decline however, this would likely mean that they would be suspended or their licence would be revoked until and unless such a scheme was accessed, and their driving abilities properly assessed.</p> <p>Cleanliness of vehicles – point noted</p> <p>Stickers on windows – point noted</p>
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		<p>motoring offence. (We strongly recommend and encourage hackney carriage licence holders to do the same). An arrest for any of the offences within this scope will result in a review by the Licensing Authority as to whether the licence holder is fit to continue to do so. Hackney Carriage and Private Hire Licensing Policy 2022 - 2027 31</p> <ul style="list-style-type: none"> <li>e) Checks carried out because of information or intelligence received by Licensing Services.</li> <li>f) Periodic medical examination</li> <li>g) Periodic safeguarding including CSE awareness training</li> <li>h) Periodic disability awareness training</li> <li>i) Right-to-work / immigration checks</li> <li>j) Check of the National Register of Taxi Licence Refusals and Revocations (NR3)</li> <li>k) Requirement to undertake a driver improvement scheme</li> </ul> <p>Before drivers can agree to be bound by these terms – surely we should be advised what exactly is included within the scope of a “driver improvement scheme”. I note it is also referred to as a “driving improvement scheme” under the motoring offences section.</p> <p>Standard Conditions of a Private Hire Driver Licence</p> <p>The licensed driver shall:</p> <ul style="list-style-type: none"> <li>a) Notify the Council as soon as possible, and confirm in writing within seven days, of any alteration to their circumstances or material including but not limited to: Hackney Carriage and Private Hire Licensing Policy 2022 - 2027 33 (i) Change of address (ii) Change of name (iii) Change of private hire operator (iv) Accepting a fixed penalty notice or caution, or receiving a Criminal Behaviour Order (CBO), attendance at any speed awareness course (v) Injury sustained or illness including mental health illness that may alter their medical status in line with DVLA Group II standards or affect their driving ability (vi) Details of any motoring fixed penalty endorsements received</li> <li>b) Notify the Council within 48 hours of being arrested/bailed/charged with/convicted of, reported for an offence, or otherwise investigated in</li> </ul>	
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		<p>connection with any criminal or motoring offence</p> <p>c) Notify the Council as soon as possible, and confirm in writing within 48 hours, of any traffic accident they are involved in whilst driving a licenced vehicle.</p> <p>d) Apply for and provide a DBS disclosure upon request.</p> <p>e) Provide a copy of their DVLA driving licence or equivalent upon reasonable request.</p> <p>f) Produce a valid medical certificate, upon request (Failure to do so will result in the licence being suspended)</p> <p>g) When requested attend a medical practitioner and/or submit to any drug test deemed appropriate</p> <p>h) Always behave in a professional manner when working.</p> <p>i) Keep their vehicles always clean and suitable for use by members of the public.</p> <p>Whilst I understand and agree the need for vehicles to be kept clean it is unfeasable and unrealistic for anyone to “Keep their vehicles always clean” . You could have your car washed and valeted and drive through a puddle on the way to pick up your next fare. Your vehicle is now not “always clean”. It makes no sense to include the word always as it is not attainable in reality.</p> <p><b>STANDARD CONDITIONS (VEHICLES)</b></p> <p>10. The vehicle must prominently display the following: • internal licence plate / complaint sticker on each window so it is clearly visible in all passenger areas</p> <p>I find it excessive to have these on each window in addition to; no smoking signs (legal requirement) and signs about no eating /drinking or face masks must be worn. Exactly what size would these stickers be ? Before long we won't be able to see out of the windows, bearing in mind we also need tariff stickers and licence plate on display on windscreen.</p>	
38	Respondent	It is already difficult to get a taxi in Crook, Willington and Bishop Auckland. It makes going out difficult to go out, things will only get worse with the new policy. It needs a rethink, I agree with the taxi association.	Points noted

39	Respondent	DT and PHA Response	See comments in relation to DT and PHA response above.
40	Respondent	DT and PHA Response	See comments in relation to DT and PHA response above.
41	Respondent	DT and PHA Response	See comments in relation to DT and PHA response above.
42	Respondent	DT and PHA Response	See comments in relation to DT and PHA response above.
43	Respondent	It is already difficult to get a taxi in Crook, Willington and Bishop Auckland. It makes going out difficult to go out, things will only get worse with the new policy. It needs a rethink, I agree with the taxi association.	Points noted
44	Respondent	DT and PHA Response	See comments in relation to DT and PHA response above.
45	Respondent	DT and PHA Response	See comments in relation to DT and PHA response above.
46	Respondent	<p>The National Taxi Association agree with the sentiments in the letter from the DT&amp;PHA.</p> <p>Would it be possible to organise a meeting with the National Taxi Association to discuss policy matters causing great concern to members. We note that there has not been any trade forum meetings where policy review proposals should have been discussed and agreed before being open to consultation.</p> <p>The members of the National Taxi Association believe in working with licensing authorities in the interest of all, licence holders, Councils and the travelling public.</p> <p>These interests of all cannot be fulfilled unless face to face meetings take place which is the 1st expected duty of a regulatory body in the Regulators code of practice.</p>	Points noted. A meeting with the Durham Taxi Working Group took place during the 4-week consultation period.
47	Respondent	<p>I believe the current policy put forward is going to reduce the number of drivers available.</p> <p>Like my husband many are over 50 and are starting to reduce the number of unsocial hours he does.</p> <p>Where are the new young drivers coming from? point noted</p> <p>This policy is short sighted and written by someone with no experience of the trade.</p> <p>I don't know if it is design or not, but this will put young women in danger which is why I believe it was written by a man.</p>	Points noted

		I agree with the taxi association this policy is draconian and an attack on the trade.	
48	DT and PHA	<p>As a PH Operator people are not willing to wait months to be able to work.</p> <p>The current proposed policy will mean more drivers leaving and not being replaced.</p> <p>The new policy could almost have been written by the large firms to destroy the competition.</p> <p>We agree with the taxi association and believe this needs major changes; I have never seen such anti small business actions since the 70s.</p>	Points noted
49	Respondent	DT and PHA Response	See comments in relation to DT and PHA response above.
50	Respondent City of Durham Parish Council	<p>With up to 900 licensed vehicles permitted to operate in Durham City at any one time, the review of the Hackney Carriage and Private Hire Licensing Policy is of real importance to our parish area and we are grateful for the opportunity to respond to this important consultation .</p> <p>The City of Durham Parish Council applauds the extensive work which has been carried out by both the Department for Transport and Durham County Council in formulating this revised policy; with the key aims of ensuring the safety and welfare of the public, encouraging environmental sustainability and ensuring efficient taxi and private hire services in County Durham.</p> <p>Primarily, there is clearly a consensus that common core minimum standards are required to better regulate the taxi and private hire vehicle sector. The Statutory Taxi and Private Hire Vehicle Standards reflect the significant changes in the industry and lessons learned from experiences in local areas since the 2010 version of the Department for Transport's Best Practice Guidance. It is noteworthy that the recommendations set out in the Statutory Taxi and Private Hire Vehicle Standards document</p>	Points noted

		<p>(and which the proposed County Council policy seeks to incorporate) are the result of extensive consultation with the taxi and private hire vehicle sector, regulators and safety campaign groups.</p> <p>Following on from the 2020 consultation, the Parish Council understands that this present consultation is taking place to allow for further responses that may result from or reflect the effects of the Covid pandemic on the taxi trade and the travelling public. Whilst much of the Policy remains unchanged from the 2020 proposals, some significant amendments have been made and these are helpfully detailed on the County Council's website.</p> <p>The Parish Council very much welcomes much of what is proposed from the 2022 amendments to the Hackney Carriage and Private Hire Licensing Policy 2021 – 2026 and would make the following comments.</p> <p>Vehicle emissions and manufacturer criteria Firstly, the Parish Council very much welcomes that this Policy now includes a requirement that all new applications must meet at least Euro 6 vehicle emissions standards. I.e. for a diesel vehicle, it cannot emit more than 80mg/km of NOx (nitrogen oxides) gases and a petrol vehicle cannot emit more than 60mg/km. The previous Policy proposed that this commence from 1st April 2024 and the Parish Council is pleased to understand that this will commence as soon as this Policy is adopted by the Full County Council.</p> <p>Furthermore, for all renewal (existing vehicles) applications, the Council now proposes that, after the 1 January 2023, DCC will not accept renewal applications for licensed vehicles meeting Euro 4 or lower. After the 1 January 2024, DCC will not accept renewal applications for licensed vehicles</p>	
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		<p>meeting Euro 5 or lower. The Parish Council very much welcomes this amendment to the wording of the Policy. The Parish Council believes that specifying Euro emissions standards in the Policy is preferable to a specification of the age of the vehicle as Euro emissions standards must be the predominant factor of a vehicle not its age. The 2023 standard is new and acceptable to the Parish Council. However, the Parish Council requests that the original proposal from 2020 that all renewal applications from 1st April 2024 must meet Euro 6 emissions standards – as opposed to the newly proposed Euro 5 or lower standard – be reintroduced to the Policy.</p> <p>The revised Policy has also removed the 2020 proposal for wheelchair accessible vehicles (WAV), i.e. that existing licensed WAV's will have an extra two years added to the age restriction, meaning that WAV's that are more than 10 years old will not be re-licensed after 1 April 2024. The Parish Council's understanding from the new Policy is that there are no vehicle emissions standards for WAVs at all. This should be clarified in the new Policy.</p> <p>The Parish Council very much applauds the commitments made by the North East Combined Authority (NECA) at the North East Joint Transport Committee on 17th November 2020 to expand the EV charging network in the region and to invest in enabling infrastructure for this to happen. As such, the Parish Council very much welcomes the clear and unambiguous statement in the 2022 Policy that “zero emission vehicles - fully electric and zero emission (at source) vehicles are welcomed by the Council” with no specification of age restriction etc. The Parish Council would equally welcome any and all new initiatives by the County Council to support the roll out of Electric Vehicles as part of its existing fleet and thereby include an incentive to drivers e.g. a reduced application fee</p>	
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		<p>or similar in order to demonstrate this support.</p> <p>The Parish Council fully supports the additional amendments made to this Policy.</p>	
51	Respondent	DT and PHA Response	See comments in relation to DT and PHA response above.
52	Durham Green Party	<p>Comments expressed represent the views of County Durham Green Party (CDGP) members. We are surprised by the delay to this policy update, but appreciate the chance to comment on the draft document. Whilst welcoming the inclusion of national guidance that should ensure better safety for passengers, we are concerned to see the watering down of the emissions/age standards for both new/replacement licensed vehicles and renewal licenses since the 2020 draft. The "proposed changes" listed on the consultation summary page are confusing regarding the vehicle emissions standards as they do not explain WHY the standards have been weakened since the last draft. Why, given DCC's commitment to reduce emissions and to lead the way on addressing climate change, is County Durham destined to potentially have the weakest emissions standards for taxi licensing across all of the North East Local Authorities (LAs)? ! How is this policy going to improve the AQMAs in Durham City and Chester-le-Street? There is also confusion on when the policy is intended to run until, as the consultation states 2026 but the draft document runs through to 2027.</p> <p>Vehicle Emissions and Manufacture Criteria (Para 4.0)  The Dept for Transport's 'Statutory Taxi &amp; Private Hire Vehicle Standards (July 2020)' refers (at Para 4.21) to the LGA's 'Taxi and PHV Licensing Councillors handbook (July 2021)', where one criterion on the main checklist asks: "Do your taxi licensing officers have a regular dialogue with neighbouring councils, with a view to adopting consistent standards, developing a common approach and to share relevant information?" Given that there was originally an aim to standardise the taxi emissions license</p>	Points noted

		<p>standards across all 12 of the North East LAs (as taxis do not stay within council boundaries), we would question why the Council has been unable to achieve this. It's also confusing why some LAs are setting vehicle age limits and others are using the EURO emissions standard, as this does not seem to account for any retrofitting of vehicles. Perhaps an emissions test would be better? We welcome that all new applications will need to meet the EURO 6 standard but it means that from this year newly licensed vehicles could be 7+ years old, which lags behind the previous aim of new licenses only for vehicles less than 4 years old (which Newcastle, Hartlepool, Darlington, and Gateshead have). Newer vehicles generally have better fuel efficiency. The proposal for vehicle license renewals has also drifted slightly from the original aim (and the phrasing at Para 4.2 is a tad confusing) but we can understand the need to phase in the EURO 5 standard (2023, vehicles 9-12 years old) then EURO 6 standard (2024, vehicles up to 9 years old), but again, many other LAs have more stringent age limits for renewals. At Para 4.3 we feel there should be more of a statement on how DCC will be encouraging licensees to switch to LEVs, eg via grants or by the introduction of CAZ/LEZs in the towns/city.</p> <p>Promotion of taxi licensing objectives (Para 6.0) We feel that there is little in this section on the aim (5.1c) of "encouraging environmental sustainability". There should be a recognition that emissions (and noise pollution) from taxis could be further reduced by better maintenance of vehicles, eco-driving practices and by drivers switching off engines when stationary or idling, both at taxi ranks and when picking up from private addresses. Other LAs have a statement on this in their policies (eg Darlington, Stockton and Newcastle). Under para 6.2 there is reference to a "current Community Protection Enforcement Policy", but our members were unable to find this on the DCC website. A clear policy is</p>	
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		<p>needed on what any enforcement should be regarding excessive engine idling or poorly maintained vehicles.</p> <p>Appendix 1: Drivers We feel that, in addition to the safeguarding and disability awareness training, drivers should attend emissions awareness training (smarter driving/no idling etc) and vehicle maintenance training (for better road efficiency).</p> <p>Additional The draft policy does not include a 'code of conduct' for drivers/passengers or 'taxi rank etiquette' which are included in the policies of other LAs, eg Newcastle's. This could include a requirement for private hire taxis to turn off their engines when waiting (as a courtesy to residents) and no engines idling at a taxi rank, or the use of start/stop technology. Driver behaviour can be as much of a factor in reducing emissions as the standards.</p> <p>[Response compiled by Janet Hutchinson on behalf of COGP members</p>	
53	The City of Durham Trust	<p>Dear Sir or Madam,</p> <p>Hackney Carriage and Private Hire Licensing Policy</p> <p>The Trust is grateful for the opportunity to respond to these proposals.</p> <p>Vehicle emissions and manufacture criteria The Trust welcomes the phasing out of vehicles which do not meet the Euro 6 standard. For newly-registered vehicles the Trust would like to see stronger criteria. The first registrations for Euro 6 compliant vehicles were seven years ago. Requiring newly-registered vehicles to meet the Euro 6 standard and to be less than 4 years old as required by Newcastle. Darlington, Gateshead and Hartlepool would be of benefit, as newer vehicles will tend to be even more fuel-efficient.</p>	Points noted. Taxi rank and telemetry proposals lie outside licensing policy remit.

		<p>The Trust would like to see the policy strengthened to encourage a move to low emission vehicles (e.g. fully electric). Giving notice of a future date when licence renewal for fossil-fuel vehicles will start to be phased out would enable taxi companies to plan their replacement programmes. Perhaps for firms with large fleets the council could require a steadily-increasing percentage of vehicles to be electric over the rest of the decade. The Council should also require higher emissions standards within air quality management areas like Durham City Centre.</p> <p>Environmental sustainability Although environmental sustainability is listed as one of the aims and objectives of the licensing policy at 5.1(c) there is little, other than the inspection and testing of vehicles, to deliver this aim. The policy should include a requirement to turn off engines when waiting at taxi ranks or when a taxi or private hire vehicle is collecting a passenger. This would reduce both emissions and noise pollution. Newcastle and Darlington each have statements to this effect in their policies. Prior to the commencement of the bus station works, idling taxi engines contributed greatly to the localised air pollution in North Road. Could compulsory training for drivers also include fuel-efficient driving techniques?</p> <p>Taxi ranks The more popular taxi ranks may be oversupplied with vehicles, and when a taxi rank is full, taxi drivers may be tempted to park their vehicles in loading bays and other locations approaching tail end of the rank. The Trust would also like to see stronger wording against this practice coupled with enforcement. Long taxi ranks, such as on North Road, occupy a lot of valuable street space without the level of demand during the daytime to justify the number of waiting vehicles. It is essentially parking provision in premium street space which should be reallocated to sustainable transport or features such as seating to make streets more liveable. Could a common online/telephone taxi hailing/booking system reduce the</p>	
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		<p>need for taxi ranks and improve the taxi service by spreading vehicles more evenly? Reducing the distance travelled by taxis travelling empty would reduce emissions and help support our climate change objectives.</p> <p>Road safety Some insurers now offer motorists lower premiums in return for installing a “black box” which monitors the style of driving and compliance with speed limits. Is it possible for the council to require telematic monitoring through the licensing regime to improve road safety?</p> <p>Yours faithfully,</p> <p>Francis Pritchard Hon. Secretary</p>	
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