

# Taxi Licensing Committee



Date of meeting:	01 February 2024
Title of Report:	<b>Review of Hackney Carriage and Private Hire Licensing Policy 2022 and Associated Polices and Conditions</b>
Lead Member:	Councillor Sally Haydon (Cabinet Member for Community Safety, Libraries, Cemeteries & Crematoria)
Lead Strategic Director:	Ruth Harrell (Director of Public Health)
Author:	Nicola Horne
Contact Email:	nicola.horne@plymouth.gov.uk
Your Reference:	NH/TLCPOLICY/FEB24
Key Decision:	No
Confidentiality:	Part I - Official

## Purpose of Report

The Council's Hackney Carriage & Private Hire Licensing Policy is framed by virtue of the powers granted to the Council by Town and Police Clauses Act 1847, the Plymouth City Council Act 1975 and the Plymouth City Council Act 1987.

The Council adopted its third Hackney Carriage and Private Hire Licensing Policy (the Policy) in May 2022 which updated and set out a licensing framework required to regulate hackney carriage and private hire services within Plymouth. The Policy can be viewed at the following link:

[Taxi policy, guidance and byelaws - 2022 | PLYMOUTH.GOV.UK](https://www.plymouth.gov.uk/taxi-policy-guidance-and-byelaws-2022)

It is best practice and will always be the intention of the Council to keep the policy under review and to adjust as required. This report contains a number of suggestions for insertions and clarifications that are considered necessary for various reasons, set out in the report and that take into account the economic and operational changes that have arisen since the current policy's implementation.

The proposed amendments and associated documents were published on Plymouth City Councils website between 24 October to 23 November 2023. All licensed drivers, vehicle proprietors and operators were consulted, in addition to a variety of agencies and departments including disability groups, resident's associations and businesses.

A total of 386 responses were received following the public consultation.

The results of the online survey are included in the Briefing Report attached to this report as Appendix A. All comments received including those from the Plymouth Licensed Taxi Association (PLTA) are shown in the Appendix documents C to L.

Should Committee approve the proposed amendments, the Policy, associated conditions and guidance notes will be updated to be implemented on 1 April 2024 to allow sufficient time to amend the documents, inform the trade, garages who undertake compliance checks and other interested parties.

### Recommendations and Reasons

- I. Adopt the proposed amendments to the Hackney Carriage and Private Hire Licensing Policy and associated conditions and guidance documents detailed in this report with effect from 1 April 2024.

Reason: - The proposed amendments are considered necessary when taking account best practice guidance, economic and operational changes that have arisen since policy implementation in May 2022

### Alternative options considered and rejected.

- I. The Council has considered leaving the Policy and conditions as written however there are certain elements of the policy that require amendment, due to the cost-of-living crisis, and for clarity, to remove some ambiguity in the current policy. By doing nothing, these issues will remain.

### Relevance to the Corporate Plan and/or the Plymouth Plan

N/A

### Implications for the Medium-Term Financial Plan and Resource Implications:

No implications identified.

### Financial Risks

The costs of implementation will be met, proportionately, through the existing hackney carriage and private hire trade budgets which are funded through the vehicle, driver and operator licence fee income.

Any amendments to the licensing policy should have no financial impact to the general account.

### Carbon Footprint (Environmental) Implications:

None identified.

### Other Implications: e.g. Health and Safety, Risk Management, Child Poverty:

*\* When considering these proposals members have a responsibility to ensure they give due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act and those who do not.*

None identified.

### Appendices

*\*Add rows as required to box below*

Ref.	Title of Appendix	Exemption Paragraph Number (if applicable) <i>If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12 of the Local Government Act 1972 by ticking the relevant box.</i>						
		1	2	3	4	5	6	7
A	Briefing report title							
B	Consultation Questions Document							
C	COGC Responses Part 1							

D	COGC Responses Part 2								
E	Dress Code Responses								
F	GRCC Responses								
G	Card Reader Responses								
H	Penalty Point Responses Part 1								
I	Penalty Point Responses Part 2								
J	Private Hire Vehicle Specification Responses Part 1								
K	Private Hire Vehicle Specification Responses Part 2								
L	Private Hire Vehicle Specification Responses Part 3								
M	Vauxhall Grandland								

**Background papers:**

\*Add rows as required to box below

Please list all unpublished, background papers relevant to the decision in the table below. Background papers are unpublished works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based.

Title of any background paper(s)	Exemption Paragraph Number (if applicable)						
	1	2	3	4	5	6	7

*If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.*

**Sign off:**

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Originating Senior Leadership Team member: Ruth Harrel

Please confirm the Strategic Director(s) has agreed the report? Yes

Date agreed: 20/01/2024

Cabinet Member approval: Councillor Sally Haydon (Cabinet Member for Community Safety, Libraries, Cemeteries & Crematoria) approved by email.

Date approved: 19/01/2024

## Appendix A Briefing Note

### 1.0 Background

1.1 The Council adopted its third Hackney Carriage and Private Hire Licensing Policy (the Policy) in May 2022.

This report outlines several changes to the Policy that are considered necessary when taking into consideration the economic and operational changes that have arisen since the Policy's implementation.

A full consultation exercise was undertaken between 24 October to 23 November 2023. The reasons for the consultation were outlined in the Executive Decision (ED) report that can be accessed at:

[Decision - Authorisation to consult on a review of the Hackney Carriage and Private Hire Licensing Policy 2022 and Associated Policies and Conditions - Modern Council \(plymouth.gov.uk\)](#)

The consultation document, to be read in conjunction with the ED report, is provided in Appendix B.

1.2 The Council Constitution sets out the democratic process for decision making. Some decisions are for the Taxi Licensing Committee to make, and others are for Full Council to determine. This was set out in the ED report. This report seeks to cover those specific matters that require Taxi Licensing Committee approval only, specifically item numbers 3 to 8 detailed and highlighted in bold in table 1 below.

The Livery and Topographical Knowledge of Plymouth test (KOP) have been considered by Cabinet and will be going to Full Council on 29 January 2024 for further consideration.

Table 1.

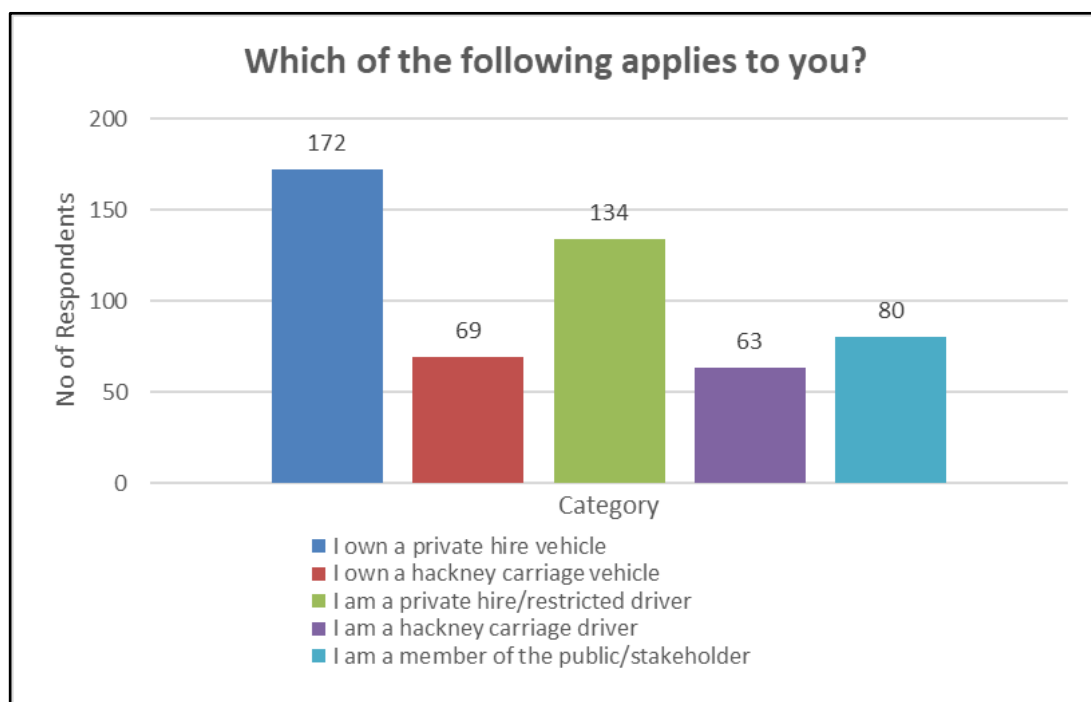
Item Number	Policy Subject/Area	Changes Required	Full Council or TL Committee
1.	Livery Policy 2022	Revoke full livery requirement & retain door signage	Full Council
2.	Topographical Test (Knowledge of Plymouth)	Remove requirement for new private hire driver applicants to take and retain for hackney carriage drivers	Full Council
3.	<b>Certificate of Good Conduct</b>	<b>Change requirement for amount of time living in country from majority of adult life to more than 10 years in line with Barrister advice and Home Office guidance</b>	<b>TL Committee</b>
4.	<b>Acceptable Standard of Dress (Dress Code)</b>	<b>Change of wording required to allow black denim, see review document for suggested wording.</b>	<b>TL Committee</b>
5.	<b>Private Hire Driver &amp; Hackney Carriage Driver New Driver Applicants (Accumulation of licence endorsements before application)</b>	<b>Amend wording to cover new applicants who have more than 6 points on licence</b>	<b>TL Committee</b>
6.	<b>Hackney carriage Conditions of Licence. (Card Holder) Fixing Point and must be operational and offered.</b>	<b>Amend card reader wording for clarity. Remove requirement for card reader fixture.</b>	<b>TL Committee</b>

7.	<b>Changes to penalty Point Scheme</b>	<b>Review of what happens when 12 points reached i.e., points go back to nil or rollover etc, and Insertion of points for additional minor offences.</b>	<b>TL Committee</b>
8.	<b>Private hire vehicle Specifications</b>	<b>Amend to allow PHV WA/tail lift vehicles to only have 1 side door. Add requirement for minimum of 4 adults to private hire vehicle specs. Amend seating requirements to allow for rear folding seats where safe and suitable. Remove engine capacity.</b>	<b>TL Committee</b>

## 2.0 Consultation

- 2.1 All drivers, vehicle proprietors and operators were sent a letter by email, explaining the proposed amendments and asking for their feedback via an online questionnaire or printable form. Letters and emails were also sent to the Cabinet Member for Community Safety, Libraries, Cemeteries & Crematoria, the Cabinet Member for Strategic Planning and Transport, all Ward Councillors, a variety of agencies and departments including disability groups, residents' associations and businesses.
- 2.2 A total of 391 responses were received, 386 were made on-line and 5 were received by post or e-mail, which were added to the online system to allow for analysis. There was an opportunity to leave comments for each question asked. Full anonymised copies of the responses are shown in Appendix's C to L.
- 2.3 Of the 391 responses received, the following breakdown of who responded to the consultation can be seen below in Figure 1. Some responders ticked more than one of the options if they were both a driver and vehicle proprietor. 80 responses were received by members of the public but again some drivers ticked this option in addition to their licence category.

**Figure 1: Breakdown of who responded to the consultation.**



### 3.0 Considerations

- 3.1 As stated in section 1.1, the proposed amendments detailed in this report are considered necessary when taking into consideration the economic and operational changes that have arisen since implementation in May 2022.
- 3.2 In addition, there have been concerns for some time about the falling numbers of hackney carriage and private hire vehicles available in Plymouth. The wider 'taxi' service, (including both hackney carriages and private hire vehicles) provides a valuable support system to residents and visitors to our city. With this in mind, it is important for the Council to consider the economic wellbeing of the city, including employment opportunities, but also consider actions that can be taken to increase the availability of hackney carriages and private hire vehicles, to support the evening and nighttime economy and ensuring visitors and residents can move around the city safely at whatever time of day or night.

It is considered that the proposed amendments remove some of the obstacles to those in the private hire and taxi trades to remaining in and investing in their future in the trade and for taxi licensing officers to effectively carry out their enforcement duties ensuring that public safety and confidence in the trade is retained so that a safe service can be provided to the public.

- 3.3 All of the individual responses to those questions delegated to Taxi Licensing Committee have been reviewed, considered and are summarised below.
- 3.4 Those matters that are delegated to Full Council (Livery Policy and Knowledge of Plymouth Test) have not been considered in this report.
- 3.5 The recently issued Department of Transport Best Practice Guidance for Licensing Authorities, published on 17<sup>th</sup> November 2023, has also been considered in reviewing the consultation responses. [Taxi and private hire vehicle licensing best practice guidance for licensing authorities in England - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/1181422/Best-Practice-Guidance-for-Licensing-Authorities-17-November-2023.pdf)

### 4.0 Certificate of Good Conduct (COGC)

#### 4.1 Part 1

The current policy requires all applicants who are a foreign national or a UK national who have for whatever reason lived for a period of three months or more in another country, to obtain a COGC from the relevant UK Embassy or Consulate of the relevant country(s) where they have resided. This is in addition to any requirement to obtain an enhanced Disclosure Barring Service Certificate (DBS certificate).

- 4.2 Some applicants can demonstrate that there are clear and compelling reasons for them to be granted 'Exceptional Circumstances' to allow that applicant to be exempt from providing a COGC. These are:
- They have spent the majority of their adult life in this country (including five continuous years immediately prior to applying for the licence).
  - They cannot obtain a COGC from the relevant country (for example, they are an asylum seeker or a refugee, or there is no known process to obtain a COGC).
  - That an enhanced DBS will provide information covering a sufficient period of their adult life to allow a determination on the applicant's fitness and propriety to be made.
- 4.3 The basis for suggesting that the exemption only applies to those who have resided in the UK for the majority of their adult life is that this would mean that the enhanced DBS is likely to provide

sufficient information for a decision to be made on their fitness to be a licensed driver in that it will cover the largest part of their adult life.

Officers consider this requirement as excessive and excludes many drivers from entering the taxi/private hire trade in Plymouth.

- 4.4 369 responses were received for this proposed amendment. Of the responses, 214 (58%) were in favour of the proposal and 155 (42%) were against the proposal. 83 further comments were received and can be viewed in Appendix C.
- 4.5 On reviewing the responses against the proposal there was some confusion that this meant that applicants would not need to obtain an enhanced DBS certificate. This is not the case as all applicants would still require an enhanced DBS.

In addition, there were some responses that this would impact on public safety and standards.

The PLTA disagreed with the proposed ten-year period stating that 'new licence applicants who have lived in this country for three years with a clean record should be encouraged to obtain work and make a contribution to society.'

- 4.6 After further legal consideration, and clarification from the Home Office, it is proposed that the requirement for an applicant to have spent the majority of their adult life in the UK is amended to having to have lived in the UK for 10 years or more.

It is considered that 10 years or more in the UK will provide sufficient DBS records to establish whether the applicant is a fit and proper person to hold a licence. Therefore, it is proposed that the wording in section 7.2, paragraph 1 of the Policy, Certificates of Good Conduct (COGC) is amended to state:

**7.2 If within 10 years of the date of application or renewal you have lived outside of the UK for a continuous period of 3 months or more since the age of 18 you must obtain a certificate of good conduct from the country or countries that you have lived in.**

#### 4.7 Part 2

It is also proposed to insert new wording into the policy for existing drivers who have been licensed for more than 5 years and who have spent 3 months or more outside of the UK to renew without a COGC or for Taxi Licensing Committee to decide dependent on the reason and justification for the absence. The proposal is not to remove the requirement to obtain a DBS but for Officers to have the discretion for existing drivers who have been licensed for more than 5 years and who have spent 3 months or more outside of the UK to renew without a COGC or for Taxi Licensing Committee to decide **dependent** on the reason and justification for the absence. This allows for Officers to consider these cases on their own merits.

- 4.8 82 responses were received in relation to this proposal. Of the responses, 48 (58%) were in favour of the proposal and 34 (42%) were against the proposal. There were 68 comments received which can be viewed in Appendix D.
- 4.9 On reviewing the responses, the majority of comments against the proposal cited public safety as a concern.

The PLTA stated that 'Again, a three-year period is sufficient with many existing licence holders having many skills obtained prior to becoming Taxi Drivers and on occasion are requested to take up their previous occupation; oil rigs, Divers; boat skippers, building contracts, electronic

engineers. Very often they are absent for more than three months. Even while waiting for repairs to a vehicle.'

- 4.10 Following a review of comments, the following wording is proposed to be inserted in Section 7 of the Policy Certificates of Good Conduct (COGC):

**7.4 Where an existing driver (who has held a licence for 5 years or more), has lived outside the UK for a continuous period of 3 months or more and cannot provide a COGC, the Council reserves the right to allow the licensed driver to continue without the requirement to provide a COGC or to review the current licence at Taxi Licensing Committee.**

## **5.0 Acceptable Standard of Dress (Dress Code)**

- 5.1 A Dress Code was introduced in the Taxi Policy in May 2022 to ensure that the hackney carriage and private hire trade portrays a professional image and to ensure that driving is carried out safely, This was inserted into the [Code of Good Conduct for Licensed Drivers – Hackney carriage and Private Hire](#).
- 5.2 Contraventions of the Dress Code can result in the driver receiving penalty points leading to a review of their licence should they receive 12 or more points within a rolling 36-month period.
- 5.3 376 responses were received to the consultation question 'Do you agree to the proposed amendment to the dress code?' 322 (86%) were in favour of the proposal and 54 (14%) were against the proposal. There were 134 additional comments received which can be viewed in Appendix E.
- 5.4 The majority of responses received were in favour of this amendment citing that provided drivers attire was clean, not scruffy or ripped that the wearing of black jeans should be allowed. Those against the proposed amendment cited maintaining driver standards as a reason.
- The PLTA are in favour that Taxi Drivers should be permitted to wear jeans but do not agree that there should be a restriction applied to the colour.
- 5.5 As previously stated Officers have listened to the arguments put forward by the trade and consider that the condition/cleanliness of the clothing is suitably covered by the existing policy wording and that allowing the wearing of black jeans will not impact on driver standards or their professionalism.
- 5.6 Consideration has been given to the arguments for and against this amendment and it is proposed that the wording should be amended to allow the wearing of black jeans:

### **Trousers/Shorts/Skirts**

**Long legged trousers or black denim jeans, knee length tailored shorts, knee length skirt or dress.**

The condition of the clothing is covered within the existing wording of the Dress Code:

**“All clothing worn by the driver must be clean and in good condition, and the driver must have good standards of personal hygiene.”**



## **6.0 Private Hire Driver & Hackney Carriage Driver New Driver Applicants (Accumulation of licence endorsements before application).**

- 6.1 It is a requirement for new and existing drivers under the Taxi Policy to meet the criteria set out in the Guidance on the Relevance of Convictions and Conduct. (GRCC)
- 6.2 Where an existing driver receives points or convictions on their driver's licence (DVLA) there are provisions in the GRCC to deal with them either by warning from taxi licensing or through review of their hackney carriage or private hire driver's licence at taxi licensing committee.
- 6.3 Where a new applicant has accumulated points on their DVLA licence prior to application, there have been occasions where they do not fall under the GRCC requirements as the policy requires an applicant to go to committee if they either have six or more points arising from convictions in the last two years or they have received more than three penalty points in the twelve months prior to applying for a licence.
- 6.4 In addition, the existing GRCC does not allow the Council to consider an applicant's pattern of offending through historic convictions or endorsements as it can with existing licensed drivers.
- 6.5 371 responses were received. 279 (75%) were in favour of the proposal and 92 (25%) were against the proposal. 65 additional comments were received which can be viewed in Appendix F.
- 6.6 The majority of responses received against the proposed amendments were in relation to the fairness of being penalised twice by the DVLA and PCC when considering driving records.
- 6.7 An individual's driver's record and any endorsements or convictions they have is always taken into account when considering if a driver is fit and proper. Officers have brought this amendment due to the disparity in the current wording between applicants and existing drivers and consider that the proposed wording removes this disparity ensuring that public safety is maintained when considering driver applicants as well as existing drivers records.
- 6.8 Taking all comments and views into account, the proposed amended wording is shown in the table below.

<b>Penalty points on a licence</b>
<b>Any applicant who applies to be a hackney carriage or private hire driver whose licence has been endorsed with more than six points in the last two years on their licence from, the date of the application being submitted, will not be granted a licence until two years after the last endorsement or conviction.</b>
<b>Any applicant who applies to be a hackney carriage or private hire driver and their driving licence record demonstrates a pattern of offending through convictions or endorsements, the Council reserves the right to review their licence application at Taxi Licensing Committee.</b>

## **7.0 Card Payments (Card Machines)**

- 7.1 The Taxi Policy introduced the requirement for the hackney carriage and private hire trade to have the facility to take electronic (card) as well as cash payments. The requirement was inserted into the hackney carriage and private hire vehicle conditions.
- 7.2 In addition, the current wording requires the card reader to 'be placed in a plastic partition between the driver and passenger' and that faults must be rectified within three days.

- 7.3 While the requirement to have a working card reader is clear and the ability to take payments by this method is implied, the wording needs to be amended for clarity and to remove any ambiguity about providing this method of payment to customers.
- 7.4 In addition, Taxi Licensing Officer receive numerous complaints from service users that many drivers claim that their card readers do not work and therefore they can only take cash payments.
- 7.5 For driver operation and in practical terms, the requirement for the card reader to be placed in a plastic partition between the driver and passenger is considered onerous and not required. Provided a working card reader is available and accessible to customers, it should be at the driver's discretion where this is placed.
- 7.6 372 responses were received. 287 (77%) were in favour of the proposal and 85 (23%) were against the proposal. 100 comments were received which can be viewed in Appendix G.
- 7.7 Those against the proposal stated that it should be the driver's discretion whether to take card or cash payments and that this should not be dictated by the Council. Comments were also received that in some areas of Plymouth there is no network coverage and that drivers should not be punished for this.

The PLTA agree that card readers should be in working order but that this should be an optional choice not imposed. The PLTA also state that there are many areas within and without Plymouth where there is no signal. There are also occasions when there are insufficient funds in a passenger's bank account. Outages also occur when the clocks alter and servers are down and submit that drivers should not be punished when not being able to take a card payment is beyond their control.

- 7.8 With regards to the 'fixed position' for the card reader the majority agreed that this is an unnecessary and burdensome requirement.
- 7.9 With regards to allowing drivers discretion to whether they can accept card or cash payments, according to the Office of National Statistics, in 2022, 59% of payment transactions in the UK were made using cards, 14% using cash and 10% using direct debit according to UK Finance's Payment markets summary. It is a fact that the majority of payments for any service are made by card and to not accept this facility would impact on the amount of service users who can access licensed vehicles and also impact public safety with the service users including elderly and vulnerable people being seriously limited.

By mandating that all drivers have working card readers, ensures that all service users can safely and securely access taxis.

Each case is considered on its own merits and where a complaint of failing to take a card payment is investigated and there is a valid/justifiable reason for this to have happened, then no formal action will be taken.

- 7.10 It is proposed that the hackney carriage and private hire vehicle conditions are amended to state:

**Hackney carriage Vehicle Conditions****9.0 Payments**

- 9.1 All hackney carriage vehicles must have a card payment reader with the ability to always take contactless payments in the vehicle for use by customers at the start of every journey.**
- 9.2 Card payment readers must be kept in working order. Drivers must not work until any faults are rectified.**
- 9.3 You must provide a receipt for payment if requested.**
- 9.4 You must not charge more than the metered fare and must not apply a charge for paying by card.**

**Private hire vehicle Conditions****9.0 Payments**

- 9.1 All private hire vehicles must provide a card payment reader with the ability to always take contactless payments in the vehicle for use by customers at the start of every journey.**
- 9.2 Card payment readers must be kept in working order and any faults rectified before accepting any customers. Drivers must not work until any faults are rectified.**
- 9.3 You must provide a receipt for payment if requested.**
- 9.4 You must not apply a charge for making a card payment.**

**8.0 Private Hire and Hackney Carriage Penalty Points Scheme****8.1 Part I**

The Penalty Points Scheme was introduced during the last Policy review to provide a more balanced, consistent and transparent approach to enforcement against licence holders who commit minor offences and can be considered a more structured and formalised method of issuing warnings.

- 8.2 The scheme does not prevent the Council from taking any other enforcement actions it is entitled to take under legislation or bylaws. Penalty points are not be added to the person's record where they are dealt with by alternative sanctions.**
- 8.3 Under the current scheme where a licence holder accumulates 12 points or more within a rolling period of 36 months, their licence will be subject to a review by the Taxi Licensing Committee. After being in operation for more than a year, it is proposed to amend the wording to reflect that if a licence holder has accumulated 12 points or more within a 36-month period and they have had their licence reviewed by Committee, that their points have been 'discharged' and they start from zero again.**
- 8.4 371 responses were received to the question, 'Do you agree to the proposed amendments to the Penalty Points Scheme?' 266 (72%) agreed with 105 (28%) not in agreement with the proposals. 71 further comments were received which can be viewed in Appendix H.**
- 8.5 On reviewing the responses, the majority of those who are against the proposals are against the penalty points scheme as a whole and state that other means of enforcement are available.**

The PLTA are not in agreement with the proposal and submit that 'thirty-six months is too long a period. There should be a rolling period of twelve months after which time the 'Points' should drop off the list and that repeat offenders for the same offence could perhaps be treated more severely.'

- 8.6 The removal of the penalty points scheme is not a consideration of this review and Officers consider that the 36-rolling period is suitable and sufficient to ensure full consideration of an individual's history and pattern of minor offences committed.

The penalty point procedure is designed to work in conjunction with other enforcement options. It provides a formalised stepped enforcement plan. The purpose of the Scheme is to record misdemeanours and to act as a record of licensees' behaviour and conduct to ascertain whether they remain a fit and proper person to be a vehicle driver or operator and/or suitable to hold a vehicle licence. It does not prejudice the Council's ability to take other action. In addition, Section 5.5 of the DFTs latest guidance document states that 'points-based enforcement systems provide greater consistency in enforcement and make better use of the licensing committee's time.

- 8.7 Officers consider that this approach is fair and proportionate for minor offences and that should points be accumulated again quickly, then any previous history of noncompliance can be taken into consideration by Committee, should the licence holder appear before them again.
- 8.8 Officers therefore propose that the following wording is inserted into the Penalty Points Scheme under 'Method of Operation' to state:

**If a licence holder accumulates 12 points or more within a rolling period of 36 months, then their licence will be subject to a review by the Taxi Licensing Committee. Once the Committee have considered the matter, the points will be considered as spent and therefore excluded from the running total recorded against any individual licensee. The Council reserves the right to take into consideration previous points accumulation and pattern of history should the 12-point threshold be reached again.**

- 8.9 Part 2

In addition to Part 1, It has been identified that there is a need to add additional point sanctions for minor breaches of policy for incorrect signage and failure to provide working card payment readers.

- 8.10 369 responses were received to the question 202 (55%) agreed with 167 (45%) not in agreement with the proposals. A further 95 comments were received which can be viewed in Appendix I.
- 8.11 Similar to Part 1, the majority of those against the proposal, do not agree with the penalty points scheme as a whole and that breaches of policy should be dealt with in other ways.

The PLTA agree with points being applied for signage but not for card readers for the reasons given in the previous section.

- 8.12 Officers have fully appraised the responses but consider that the additional sanctions are required to allow for minor offences to be dealt with by way of points instead of taking up Committee time and it is proposed that the following additional minor offences are added to the hackney carriage and private hire infringements tables:

Point Code	Offence / breach of condition or policy	Points	Driver	Vehicle proprietor	Regulatory framework
<b>H38</b> <b>(insertion)</b>	Failure to display required signage and/or displaying unsuitable or inappropriate sited signs in or on the vehicle	4	√	√	Hackney carriage Vehicle Conditions Hackney carriage Vehicle Specification and Vehicle Compliance Testing Manual
<b>P32</b> <b>(amendment)</b>	Failure to display required signage and/or displaying unsuitable or inappropriate sited signs in or on the vehicle	4	√	√	Private hire vehicle Conditions Private hire vehicle Specification and Vehicle Compliance Testing Manual
<b>H39</b> <b>(insertion)</b>	Failure to provide working card machine for customer use.	6	√	√	Conditions of Licence Hackney Carriage Vehicle
<b>P33</b> <b>(insertion)</b>	Failure to provide working card machine for customer use.	6	√	√	Conditions of Licence Private Hire Vehicle

## 9.0 Private Hire Vehicle Specifications

### 9.1 Wheelchair accessible vehicles (Tail Lifts)

9.2 Taxi Policy prescribes the minimum standards a vehicle must satisfy to be licensed as a hackney carriage or private hire vehicle by Plymouth City Council. All hackney carriages must be wheelchair accessible whereas private hire vehicles can be wheelchair accessible, but it is not a formal requirement for a vehicle licence.

9.3 Private hire vehicles are required to be fitted with at least four doors with two passenger doors at the rear with a door situated on each side of the vehicle for the use of passengers. Rear opening doors are not counted for the purpose of this specification.

9.4 While this specification is suitable for the average private hire vehicle, the requirement to have opening doors on both sides for passengers generates a problem with the availability of those private hire vehicles that are wheelchair accessible and are fitted with tail lifts.

9.5 Vehicles available with 2 side loading doors other than the rear door are becoming increasingly difficult to source from manufacturers and specialist vehicle converters. Discussions with manufacturers and vehicle conversion specialists indicate that 99% of the vehicles they provide to the private hire trade are with one side loading doors. Manufacturers also state that only one side loading door is safe in the event of an emergency as most of the side doors are 5ft wide opening for easy access in and out of the vehicle (along with the rear door (s)).

9.6 Officers offer reassurance that vehicle safety will not be compromised should this amendment be accepted as the vehicle conditions and specifications retain the requirement that they must have M1 classification from the Vehicle Certification Agency, be of fixed head design (i.e., no convertible vehicles) and fully comply with all aspects of the Vehicle Compliance Testing Manual.

9.7 M1 category vehicles are designed and constructed for the carriage of passengers and comprising no more than eight seats in addition to the driver's seat and having a maximum mass ("technically permissible maximum laden mass") not exceeding 3.5 tons. Converted vehicles are subjected to an IVA test to be classified as M1.

9.8 369 responses were received to the question where 284 (77%) agreed with the proposals and 85 (23%) were not in agreement. There were an additional 68 comments received which can be viewed in Appendix J.

- 9.9 The PLTA submitted that for the interests of passenger safety there must be doors on both sides of the vehicle to afford egress in the event of an accident and that this is particularly important in the event of a rear end shunt.

When reviewing the individual comments most agree with the proposal but are unsure whether this will increase the number and availability of these vehicles on the road.

- 9.10 While Officers are unable to quantify if this proposal will increase the number of tail lift vehicles in Plymouth, if approved the availability of these vehicles to existing and future operators will increase allowing for fleet upgrades and additional purchases that are not cost prohibitive and without compromising passenger safety.
- 9.11 It is hoped that this amendment will facilitate an increase in more licensed vehicles of this type to be able to provide a service for disabled customers without compromising on passenger safety.
- It is therefore proposed to replace the existing wording from the Private Hire Vehicle Specifications and replace with wording highlighted in bold:

### **Wheelchair Accessibility**

- 1. It is accepted that in some cases private hire vehicles need specific capability for carrying a passenger whilst in a wheelchair.**
- 2. These vehicles must be fitted with at least 3 doors with one door situated at the near side rear to allow convenient egress from the vehicle.**
- 3. The driver's door must be situated on the offside and the front passenger door situated on the nearside of the vehicle to allow convenient egress from the vehicle.**
- 4. Sliding doors are permitted to the near side rear. Any sliding door must be fitted with a device that will illuminate a sign mounted on the rear of the vehicle, which warns following traffic that the doors are opening.**
- 5. Rear loading wheelchair access is permitted. These vehicles must be fitted with a back opening door and fitted with a tail lift or ramp mechanism to allow wheelchair(s) to be loaded whilst the passenger is in the wheelchair if required.**
- 6. Ramps must be manufacturer approved and tested and must be fitted for the loading and unloading of wheelchairs from the rear or side rear side of the vehicle.**
- 7. Passenger doors and the back opening door must be capable of being readily opened from the inside and outside of the vehicle by one operation of the latch mechanism.**
- 8. Where the licensed vehicle is capable of carrying wheelchairs, all wheelchair securing devices, fixtures and fittings as specified by the vehicle manufacturer must be available for use and kept in good working order.**

## **10.0 Private Hire Vehicle Specifications**

### **10.1 Private Hire Vehicle Seating**

The current vehicle specifications policy for private hire vehicles does not state that vehicles must be able to carry 4 adults in comfort. This is an omission, and the wording needs to be

amended to reflect this requirement avoiding any ambiguity. In addition, vehicle design and safety standards have advanced over recent years. Rear fold away seats located in the boot are not permitted to be used under the current policy. However, after careful consideration it is proposed that this should be amended, where it is safe and suitable, that these seats should be allowed subject to conditions.

- 10.2 372 responses were received to the question where 284 (76%) agreed with the proposal and 88 (24%) were not in agreement with the proposals. A further 74 comments were received which can be viewed in Appendix K.
- 10.3 The PLTA submit that there should be a minimum seat width of 38cm's (15 inches) per passenger and 144.4cm's (45 inches) per rear seat as there used to be to permit three rear seat passengers to sit in reasonable comfort and those saloon PHV's with less than 144.4cm's (45 inches) on the rear seat should only be licensed for three passengers.
- 10.4 Officers have considered all comments received and consider that being prescriptive with sizes/dimensions is unnecessary and that the proposed wording is sufficient to ensure that private hire vehicles can safely accommodate four adult passengers.

Therefore, it is proposed that the private hire vehicle specification wording for seating is amended to reflect this (shown in bold):

#### Seating

1. No vehicle shall have more than 8 passenger seats (excluding the driver seat)
2. **The vehicle must be so constructed to carry a minimum of four adult passengers, with provision for one passenger seated beside the driver, and three passengers occupying the rear seats in comfort.**
3. Where a continuous forward-facing seating is provided, each seating position shall be counted where a properly functioning seatbelt is provided.
5. **All licenced passenger seats will be suitably designed for an adult passenger. We are aware that some manufacturers produce vehicles with seats that take up much of the boot compartment, these are commonly known in a saloon vehicle as (3<sup>rd</sup> row seats or Jump seats) All seats must be of a standard size not a child's seat and that there is suitable head room for adults. In addition, there must be suitable leg room for all adults when the vehicles seats are all taken.**
6. **Foldaway child seats located in the boot compartment should not generally be licensed as passenger seating for private hire services, on the grounds of suitability, passenger safety, comfort and reasonable leg room.**
7. Fold away seats will not count towards the overall passenger seating capacity of the vehicle.

## 11.0 Private Hire Vehicle Specifications

### 11.1 Engine Capacity

As with vehicle design and safety standards, vehicle engines have advanced considerably in recent years. Smaller more efficient and environmentally friendly engines can now deliver as much power as older and larger capacity engines. To reflect this advancement, it is proposed that the private hire vehicles engine must not be less than 1290cc is removed from the vehicle specifications.

- 11.2 372 responses were received to the proposal that reference to engine capacity is removed with 296 (80%) agreeing and 76 (20%) not in agreement with the proposals. There were 71 further comments received which can be viewed in Appendix L.
- 11.3 Most comments received supported the proposed amendment. Those who disagreed stated that the smaller engine performance particularly in hilly areas of Plymouth would be poor.

The PLTA responded similarly that this is not a good idea as with four adults in a PHV there remains a requirement for vehicles to have engines powerful enough to maintain a reasonable speed on the hilly terrain of Plymouth and the surrounding area and that the 1290cc specification should be retained.

A number of the consultee responses advocated the removal of reference to engine capacity but to adopt a minimum requirement for brake horsepower as an accurate reflection of a vehicles power.

- 11.4 Officers have considered all the responses and take the view that modern vehicle engines can deliver sufficient power to cope with the topography of Plymouth and out of district and that engine size, in cubic capacity, is no longer valid.

An example of such a vehicle that may be presented for licensing is the Vauxhall Grandland 1200 CC (please see Appendix M). This is a SUV sized vehicle that has a 1200cc engine and does not meet current vehicle specifications, yet the power output is 128 brake horsepower which is more than adequate to meet Plymouths Road network and beyond.

Although difficult to quantify, by removing the restriction on engine capacity the availability and choice of suitable vehicles to be licensed to the private hire trade will be greatly increased which is hoped will encourage investment in newer environmentally friendly vehicles.

- 11.5 Should members wish to ensure that vehicles are of sufficient power they may wish to consider the addition of wording whereby minimum brake horsepower is considered in place of engine capacity such as:

#### **Vehicle Dimensions and Engine Size**

1. As a minimum standard all vehicles presented for licensing shall possess a minimum of 100 BHP (Brake Horsepower).
2. In the case of a hybrid or fully electric vehicle there shall be a minimum power output of at least 100 BHP (Brake Horsepower) or the electric equivalent.

## **12.0 Hackney Carriage Door Signage**

Although not delegated to Taxi Licensing Committee, should Full Council approve the requirement for vehicle Livery to be revoked and require Hackney Carriage Vehicles to display driver and passenger door signage, the following will need to be inserted into the Hackney Carriage Vehicle Conditions.

- 12.1 It is therefore proposed that, subject to Full Council revoking the Livery Policy, that the following condition is inserted:

#### **Front Door Signage**

**From 1 April 2024, each new Hackney Carriage Vehicle on application and existing Hackney Carriage Vehicles on renewal of licence, shall display signs on the front passenger and driver's door in accordance with the design approved and supplied by the**



**Council. The signs shall be constructed of vinyl and be applied directly to the driver and front passenger door.**

12.2 In addition and subject again to Full Council revoking the Livery Policy, is proposed that where a Hackney Carriage Vehicle has been licensed for a temporary period for example where a rental vehicle is used after accident or garaged for repair, the following wording would be added to the vehicle conditions to allow a derogation for displaying door signage:

### **Temporary Vehicles**

**In exceptional circumstances, where a temporary vehicle license is issued it will be exempt from displaying front door signage**

### **13.0 Recommendations**

- 13.1 That Taxi Licensing Committee after considering the proposed amendments and associated consultation responses received and detailed in the above report in sections 4 to 10 & 12, approve the amendments as detailed.
- 13.2 That Taxi Licensing Committee consider the proposed amendment and associated consultation responses detailed in section 11 regarding engine size and capacity and approve the proposal as detailed or consider removing the reference to engine capacity and replace with a requirement for minimum brake horsepower to be inserted into the PHV specifications.
- 13.3 That Taxi Licensing Committee resolve that all approved proposed changes are inserted into the Hackney Carriage and Private Hire Licensing Policy and associated vehicle conditions and guidance documents to take effect on 1 April 2024 to allow sufficient time for implementation.

## Appendix B

### Consultation Questions

#### TAXI LICENSING POLICY OCTOBER 2023

##### Consultation Questions



The Council is consulting on proposed amendments to the Hackney Carriage and Private Hire Licensing Policy 2022 and associated guidance documents between 24 October to 23 November 2023.

The Executive Decision report can be found at:

[Decision - Authorisation to consult on a review of the Hackney Carriage and Private Hire Licensing Policy 2022 and Associated Policies and Conditions - Modern Council \(plymouth.gov.uk\)](#)

The location of the current Hackney Carriage and Private Hire Policy and Associated Policies/Conditions of Licence can be found at: [Taxi licensing | PLYMOUTH.GOV.UK](#)

#### 1. Which of the following applies to you?

- I own a private hire vehicle*
- I own a hackney carriage vehicle*
- I am a private hire/restricted driver*
- I am a private hire operator*
- I am a hackney carriage driver*
- I am a member of the public/stakeholder*
- None of the above*

#### 2. Livery Policy

Plymouth City Council (PCC) introduced a Livery Policy in May 2022. The Livery Policy requires new hackney carriage vehicles entering the fleet from 1 May 22 and existing hackney carriage vehicles to comply with the livery (colour scheme) requirements by 1 May 2027. It is also a requirement that new private hire vehicles entering the fleet cannot be white in colour.

It is proposed that the livery requirement is removed for both hackney carriage and private hire vehicles and that hackney carriage vehicles retain the requirement to have front door signage.

**Do you agree that the livery for licensed vehicles should be removed from taxi policy and hackney carriage front door signage be retained.**

- **Yes, Livery requirement should be removed:**
- **No, Livery requirement should be retained:**

Comments:

### 3. Topographical/Knowledge of Plymouth Test

It is a requirement for all new applicants wishing to become a private hire or hackney carriage driver to pass a topographical/knowledge of Plymouth test (K.O.P)

It is proposed to remove this requirement for applicants who wish to obtain a private hire drivers' licence and retain this requirement for those who wish to apply to be a hackney carriage driver.

If this proposal is approved, it is further proposed that if a private hire driver has held a licence for 3 or more years, ~~that~~ they will not need to then undertake a K.O.P test to obtain a hackney carriage drivers' licence.

Do you agree to remove the requirement for a K.O.P test for new private hire drivers?

- Yes
- No

Do you agree that a private hire driver who has held a licence for 3 years or more who wishes to become a hackney carriage driver will not need to take the K.O.P test?

- Yes
- No

Comments:

### 4. Certificate of Good Conduct (COGC)

The Taxi Policy requires all applicants who are a foreign national or a UK National but have lived for a period of three months or more in another Country, to obtain a Certificate of Good Conduct (COGC) from the relevant UK Embassy or Consulate of the relevant country(s) where they have resided. This is in addition to any requirement to obtain a DBS certificate.

Some applicants can demonstrate that there are clear and compelling reasons for them to be granted 'Exceptional Circumstances' to allow that applicant to be exempt from providing a COGC. These are:

- They have spent the majority of their adult life in this country (including five continuous years immediately prior to applying for the licence).
- They cannot obtain a COGC from the relevant country (for example, they are an asylum seeker or a refugee, or no known process)
- That an enhanced DBS will provide information covering a sufficient period of their adult life to allow a determination on the applicant's fitness and propriety to be made.

The basis for suggesting that the exemption only applies to those who have resided in the UK for the majority of their adult life is that this would mean that the enhanced DBS is likely to provide sufficient information for a decision to be made on their fitness to be a licensed driver in that it will cover the largest part of their adult life.

After further legal consideration and clarification from the Home Office it is proposed that the requirement for an applicant to have spent the majority of their adult life in the UK is amended to having to have lived in the UK for 10 years or more.

It is the Officers view that 10 years or more residency in the UK will provide sufficient DBS records to establish whether the applicant is a fit and proper person to hold a licence. Therefore, it is proposed that the wording in section 7.2 of the Taxi Policy is amended to state:

7.2 If within 10 years of the date of application or renewal you have lived outside of the UK for a continuous period of 3 months or more since the age of 18 you must obtain a certificate of good conduct from the country or countries that you have lived in.

Do you agree that the policy should be amended?

- Yes
- No

Comments:

It is also proposed to add new wording into the policy for existing drivers who have been licensed for more than 5 years and who have spent 3 months or more outside of the UK to renew without a COGC or for Taxi Licensing Committee to decide dependent on the reason and justification for the absence.

Therefore, it is proposed that the following wording is inserted to state:

Where an existing driver (who has held a licence for 5 years or more), has lived outside the UK for a continuous period of 3 months or more and cannot provide a COGC the Council reserves the right to allow the licensed driver to continue without the COGC or to review the current licence at Taxi Licensing Committee.

Do you agree that the proposed changes to the requirements to obtain a **COGC**:

- Yes
- No

Comments:

## 5. Acceptable Standard of Dress (Dress Code)

Plymouth City Council proposes to permit the wearing of black denim jeans in the dress code.

**Do you agree to the proposed amendment to the dress code:**

- Yes
- No

**Comments:**

**6. Private Hire Driver and Hackney Carriage Driver New Driver Applicants Driver Endorsements**

It is a requirement for new and existing drivers under the Taxi Policy to meet the criteria set out in the Guidance on the Relevance of Convictions and Conduct. (GRCC)

Where an existing driver receives points or convictions on their driver's licence (DVLA) there are provisions in the GRCC to deal with them either by warning from taxi licensing or through review of their hackney carriage or private hire driver's licence at taxi licensing committee. Where a new applicant has accumulated points on their DVLA licence prior to application there have been occasions where they do not fall under the GRCC requirements as the policy requires an applicant to go to committee if they either have six or more points arising from convictions in the last two years or they have received more than three penalty points in the twelve months prior to applying for a licence.

In addition, the existing GRCC does not allow the Council to consider an applicant's pattern of offending through historic convictions or endorsements as it can with existing licensed drivers.

Therefore, there is disparity between the requirements for new and existing drivers and Officers propose to amend the motoring convictions wording of the GRCC for new applicants to resolve this.

It is proposed to remove the disparity in the Guidance on the Relevance of Convictions and Conduct (GRCC) between the requirements for new and existing drivers with regards to motoring convictions.

**Do you agree with the proposal to amend the GRCC with regards to motoring convictions.**

- Yes
- No

**Comments:**



## 7. Card Payments

It is proposed to amend the hackney carriage and private hire vehicle conditions to ensure that working card readers are always used and remove the requirement for locating the card readers in fixed positions.

**Do you agree to the proposed amendments to the card reader requirements:**

- Yes
- No

**Comments:**

## 8. Private Hire and Hackney Carriage Penalty Points Scheme

Under the current scheme where a licence holder accumulates 12 points or more within a rolling period of 36 months their licence will be subject to a review by the Taxi Licensing Committee. After being in operation for more than a year it is proposed that the wording is amended to reflect that if a licence holder has accumulated 12 points or more within a 36-month period and they have had their licence reviewed by Committee that their points have been 'discharged' and they start from zero again.

**It is proposed to amend the penalty system to state**

**If a licence holder accumulates 12 points or more within a rolling period of 36 months, then their licence will be subject to a review by the Taxi Licensing Committee. Once the Committee have considered the matter, the points will be considered as spent and therefore excluded from the running total recorded against any individual licensee. The Council reserves the right to take into consideration previous points accumulation and pattern of history should the 12- point threshold be reached again.**

**Do you agree to the proposed amendments to the Penalty Points Scheme**

- Yes
- No

**Comments:**

It is also proposed to introduce the addition of **penalty** points for failure to display required signage and/or displaying unsuitable or inappropriate sited signs in or on the vehicle and for failure to provide working card machine for customer use.

Do you agree to the proposed amendments to include these penalty points?

- Yes
- No

Comments:

#### 9. Private Hire Vehicle Specifications

Taxi Policy prescribes the minimum standards a vehicle must satisfy to be licensed as a hackney carriage or private hire vehicle by Plymouth City Council. All hackney carriages must be wheelchair accessible whereas private hire vehicles can be wheelchair accessible, but it is not a formal requirement for a vehicle licence.

It is proposed that removing the requirement for wheelchair accessible private hire vehicles to have passenger doors on both sides of the vehicle will encourage investment in newer wheelchair accessible vehicles by not making this investment cost prohibitive. It is hoped that this amendment will facilitate an increase in more licensed vehicles of this type to be able to provide a service for disabled customers without compromising on passenger safety.

It is proposed to amend the PHV vehicle specifications to wheelchair accessible/tail lift vehicles to not be required to have loading doors on both sides of the vehicle.

Do you agree to the proposed amendments to the Private Hire Vehicle Specifications:

- Yes
- No

Comments:

The current vehicle specifications policy for private hire vehicles does not state that vehicles must be able to carry 4 adults in comfort. This is an omission, and the wording needs to be amended to reflect this requirement.

Do you agree to the proposed amendments to the Private Hire Vehicle Specifications:

- Yes
- No

Comments:

As with vehicle design and safety standards vehicle engines have advanced considerably in the last years. Smaller more efficient and environmentally friendly engines can now deliver as much power as older and larger capacity engines. To reflect this advancement, it is proposed that the private hire vehicles engine must not be less than 1290cc is removed from the vehicle specifications.

**Do you agree to the proposed amendments to the Private Hire Vehicle Specifications:**

- Yes
- No

**Comments:**



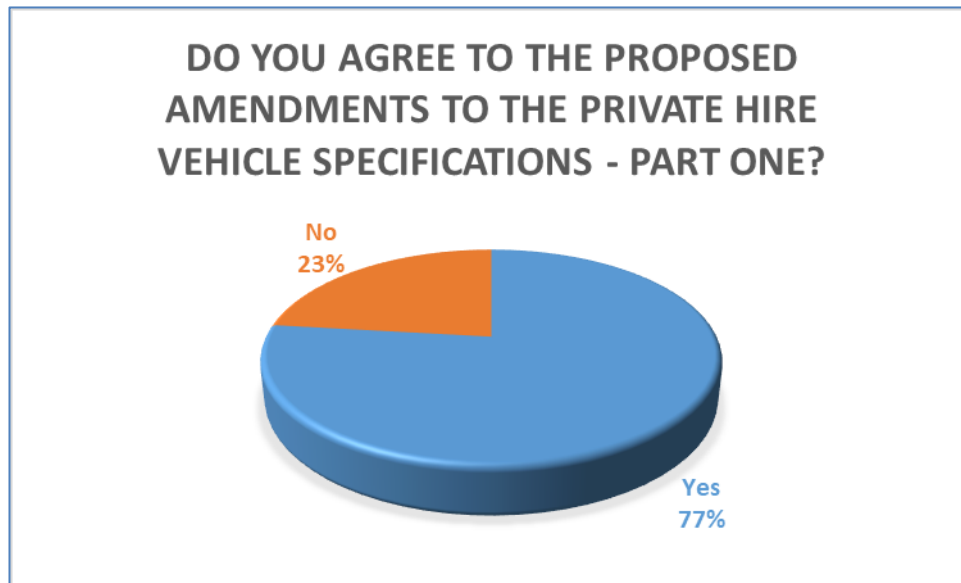
## Appendix C

### Comments received in the online survey.

Certificate of Good Conduct (COGC) - Part One

Do you agree that the policy should be amended?

369 responses were received in relation to reducing the requirement to having resided in this UK for the majority of more than half of your adult life to more than 10 years. Of the responses, 214 (58%) were in favour of the proposal and 154 (42%) were against the proposal.



83 comments were received.

#### Plymouth Licensed Taxi Association Response:

We do not agree with a ten-year period. New Licence Applicants who have lived in this country or three years with a clean record should be encouraged to obtain work and make a contribution to society.

ID	Name	Responses
1	anonymous	Everyone should be treated equally and have a 10 year checkable DBS
2	anonymous	No clear DBS, no license and no exceptions i.e. letter of good conduct is not acceptable.
3	anonymous	No
4	anonymous	Some people commits crimes in they home country how can u be sure that wasn't related with children or female abuse ?
5	anonymous	All persons applying to be a taxi driver in Plymouth City, should always have DBS or if coming from another country, whether here for months or years

ID	Name	Responses
		should have a letter of good conduct, how do the public know its safe to be in there cab, the council would be guilty if they didn't show due diligence.
6	anonymous	This "asylum seeker or a refugee" reason for not be able to obtainan COGC is a little bit racist towards other drivers who where force to have that one when they aplied for an driver licence.The law should be the same for everybody!
7	anonymous	No
8	anonymous	I've clicked no but I really don't understand the question if it help I feel everybody who has a badge should be legal and most importantly dbs clear
9	anonymous	N
10	anonymous	Remove the KOP test
11	anonymous	No corners should be cut. It is more important that the people of Plymouth are safe to use taxis in the city than increasing the number of taxi drivers on the road.
12	anonymous	No
13	anonymous	No
14	anonymous	A clean record can inspire confidence in customers. They expect a safe ride with a taxi driver, which can be easier to accept when the driver has no criminal record.
15	anonymous	Wording is a bit confusing
16	anonymous	No one who can obtain dbs from the UK government should be granted a licence.this is not racist in anyway shape or form .the whole idea of dbs is to keep the public or vulnerable safe.how can some worthless letter from a mayor of some town who doesn't actually know the individual confirming he is trustworthy. I personally wouldn't want any of my family travelling in a licenced vehicle by anyone unchecked by dbs .
17	anonymous	If it isn't broke why try to fix it
18	anonymous	I do not agree. I find the current policy reassuring that all measures are taken to ensure my safety.
19	anonymous	A clean record is often one of the eligibility criteria for obtaining a taxi driver's license. Prospective drivers with significant criminal records may be turned away or denied a license. A clean record can inspire customer confidence. They expect a safe ride with a taxi driver, which can be easier to accept when the driver has no criminal record.
20	anonymous	To be on the safe side I think is much better to ask for a certificate. You will protect the public

ID	Name	Responses
21	anonymous	no
22	anonymous	None
23	anonymous	No one , with no exception, should be able to work as a taxi driver in any capacity unless you are satisfied that they have the correct paperwork to do the job and are no threat to their customers
24	anonymous	When I moved to this country and applied for a taxi license, I had to provide COGC. Remember that some people are trying to escape from their country due to criminal offences. Therefore, to ensure the public's safety, this requirement should be in force.
25	anonymous	No
26	anonymous	These rules are fair across the board, again... it ain't broke - don't fix it.
27	anonymous	I think that the current rules are perfect
28	anonymous	No
29	anonymous	Everyone should have a DBS check including taxi licensing staff and councillors connected to taxi licensing.
30	anonymous	n
31	anonymous	n
32	anonymous	n
33	anonymous	n
34	anonymous	n
35	anonymous	n
36	anonymous	To protect the travelling people from and visiting our city every driver no matter where their original country of residence was MUST supply either a dbs or equivalent NO EXEPTIONS
37	anonymous	No comment.
38	anonymous	Yes that sounds fair, even though I had to spend time and money to get the certificate myself, and many others had to go through it, so will we be getting our money back??
39	anonymous	NO
40	anonymous	Every driver should have aDBS ckeck
41	anonymous	No coment on this section

ID	Name	Responses
42	anonymous	By far the applicant should have a proper check.
43	anonymous	In addition to the stated amendment, it would be great if Council can publish a report showing data of how many applicants have submitted a COGC that contains an indictment. If there's been little or no record of applicants being disqualified by indictments in COGC then council might need to rethink and revisit the COGC requirement entirely. Maybe Enhanced DBS would be sufficient for all applicants provided they are lawful residents of the UK.
44	anonymous	Theoretically, a person could have committed a serious offence in another country over ten years prior, especially one that would be an automatic bar for obtaining a licence. If the policy was amended then it is highly likely that this wouldn't be picked up during the checks.
45	anonymous	More watering down of standards.... Great idea.....NOT
46	anonymous	No
47	anonymous	Safe guarding
48	anonymous	No
49	anonymous	Pointless if you allow non checks regarding (They cannot obtain a COGC from the relevant country for example, they are an asylum seeker or a refugee, or no known process)
50	anonymous	I think this should be scrapped as it is sometimes hard to obtain this information from some countries.
51	anonymous	No comments
52	anonymous	No
53	anonymous	No
54	anonymous	No
55	anonymous	No comments
56	anonymous	Safe reasons. I wouldn't trust any part-time "taxi driver licensed" to go wherever and to do whatever for how long they want without any evidence.
57	anonymous	All have to of been a full legal Uk resident with voting rights for 5 / 10 years , this also gives a fair background check through an enhanced DBS check
58	anonymous	I've not entered yes or no, it would seem from my own personal experience of working in the trade that pretty much anyone is already 'suitable' to become a taxi or private hire driver, regardless of past criminality or lack of records to prove otherwise, basic english requirements seem to have been swept under the carpet too, it's seems as though everything is done to enable new arrivals into the trade by pcc, maybe under pressure from taxi/private hire companies

ID	Name	Responses
		desperate for a steady supply of new meat so that their profit streams remain healthy.
59	anonymous	No comment
60	anonymous	N/A
61	anonymous	Why?
62	anonymous	Exemptions required for Armed Services, Merchant Navy, Boat Skippers, the list goes on.
63	anonymous	All DBS should be fair. If a person here must prove they have a ten year checkable history then people from overseas must prove the same or we could allow rapist and serious criminals to be alone with females late at night.
64	anonymous	N/A
65	anonymous	Drivers should be checked for sexual offences back to school
66	anonymous	not interested as its the council too blame in courts and press.
67	anonymous	10 years in UK is the right DBS
68	anonymous	No
69	anonymous	To protect people from crime we must make sure everyone is checked for serious crimes
70	anonymous	I believe you should have to live in this country for at least 3 years so then you can have an enhanced DBS search conducted on you
71	anonymous	Safety of the public should be paramount, no exception when related to Safety
72	anonymous	Increase the period for a minimum more than 6 months to 1 year.
73	anonymous	If the person has a criminal record before coming to the UK, how can you know?
74	anonymous	No
75	anonymous	Passenger safety is top priority
76	anonymous	By offering your services to the people and taking care of them, I think that you need to be an example to the other especially by your behaviour even if you lived in a different country for three months or more
77	anonymous	Should be amended, as it will be more fair to applicant and in accordance to real needs of checking fit and proper applicant.

ID	Name	Responses
78	anonymous	Not sure but if I where moving abroad I would want to keep my licence live in case I return
79	anonymous	No comments
80	anonymous	Is a big risk if you don't know what he is done prior coming in UK. As far as I know is fairly ease to get a false document from some country as well.
81	anonymous	I think it should stay as it is for the safety of the public.
82	anonymous	We need to make sure there are no sexual predators

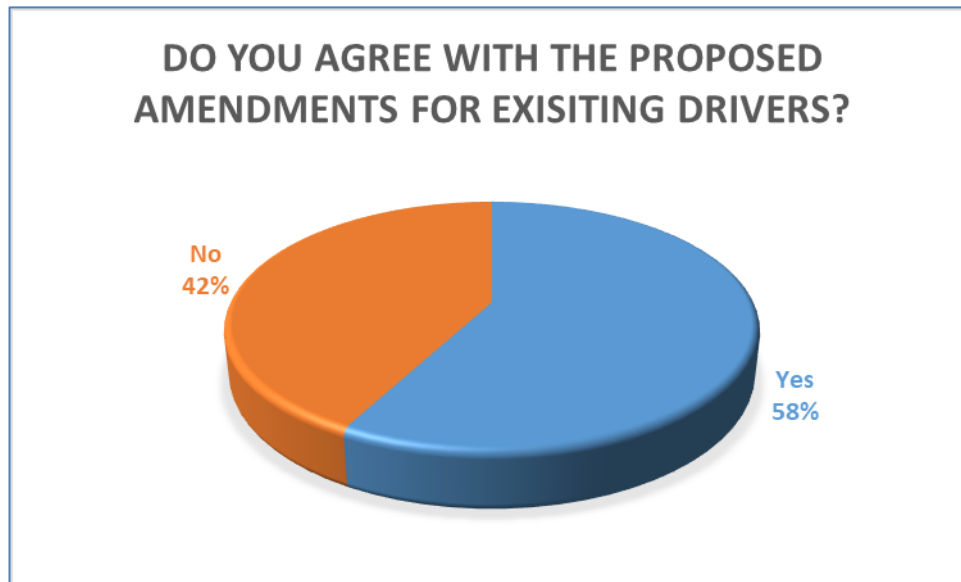
## Appendix D

### Comments received in the online survey

Certificate of Good Conduct (COGC) - Part Two

Do you agree with the proposed amendments for existing drivers?

371 responses were received. 242 (65%) were in favour of the proposal and 129 (35%) were against the proposal.



68 Comments were received

Plymouth Licensed Taxi Association response:

Again, we submit that three years is quite sufficient. Existing Licensees have many skills obtained prior to becoming Taxi Drivers and on occasion are requested to take up their previous occupation; oil rigs, Divers; boat skippers, building contracts, electronic engineers. Very often they are absent for more than three months. Even while waiting for repairs to a vehicle.

ID	Name	Responses
1	anonymous	Yes many who fill out this form will be taxi drivers who wish to keep the taxi numbers shrinking so they have a strangle hold on the city
2	anonymous	Why keep moving goal posts, keep it clear if you don't meet criteria then no license.
3	anonymous	No
4	anonymous	All drivers should show that they are a fit and proper person to carry passengers in the city or beyond.
5	anonymous	No
6	anonymous	N/a

ID	Name	Responses
7	anonymous	No
8	anonymous	Remove the test
9	anonymous	N
10	anonymous	No
11	anonymous	No
12	anonymous	Local laws and regulations may require taxi drivers to have clean records. Violation of these requirements may result in penalties or license revocation. The drivers with clean records help maintain a positive image of the taxi industry and public transport services.
13	anonymous	Why would you allow someone to go off for more than 3 months to a country that cannot produce a certificate of good conduct and not require this. This is a risk as you do not know anything about what has happened in this period.
14	anonymous	Every driver should be up to date with all aspects of licencing not just when it suits .
15	anonymous	Why were these policies put in place in the first place???
16	anonymous	Local laws and regulations may require taxi drivers to have clean records. Violation of these requirements may result in penalties or license revocation. Drivers with clean records help maintain a positive image of the taxi industry and public transport services.
17	anonymous	Doesn't matter for how long a driver to be in the trade
18	anonymous	no
19	anonymous	None
20	anonymous	Who knows what's gone on in that Country? If they're in a Country for more than 3mths it must be a safe place.
21	anonymous	No
22	anonymous	No
23	anonymous	These rules and regulation's are there to protect the General Public and to also keep the drivers "in line with policy".
24	anonymous	Those who stay for more than 5 months a year in their country of origin stay there for a purpose for example families so I don't see why I would change anything for them once they do their duty as citizens in the UK
25	anonymous	No



<b>ID</b>	<b>Name</b>	<b>Responses</b>
26	anonymous	Al it can happen in 3 months if out of the.country
27	anonymous	remove the test
28	anonymous	n
29	anonymous	n
30	anonymous	n
31	anonymous	n
32	anonymous	n
33	anonymous	Providing the taxi licensing committee interviews the applicant.
34	anonymous	NO
35	anonymous	No comments
36	anonymous	No
37	anonymous	No
38	anonymous	Stupid idea
39	anonymous	No
40	anonymous	More should be done to protect the disabled too many small private hire vehicles not big enough for folding up wheelchairs in their boots
41	anonymous	No
42	anonymous	No
43	anonymous	No
44	anonymous	No
45	anonymous	No comments
46	anonymous	No
47	anonymous	No comments
48	anonymous	See reply to part one
49	anonymous	No
50	anonymous	No
51	anonymous	Just need more taxis

<b>ID</b>	<b>Name</b>	<b>Responses</b>
52	anonymous	If a Driver has acted responsibly for such a period, I see no problem
53	anonymous	The council must take responsibility if they licence an ex criminal who attacks again while at work.
54	anonymous	No
55	anonymous	We must check everyone against sexual offences to keep females safe
56	anonymous	Every driver out for 3 months 8s predictable for recheck!
57	anonymous	Cogc still needed in my opinion
58	anonymous	No
59	anonymous	Safety of the public comes first.
60	anonymous	Allow the experienced driver to continue without the COGC
61	anonymous	No
62	anonymous	No
63	anonymous	It will be fair. Driver after 5 years of service is probably still fit and proper even if he was outside UK for more than 3 months.
64	anonymous	No
65	anonymous	why should an already licensed driver require a COGC for being out of the country for more than three months .
66	anonymous	I would agree if it was stated that the 3 months in question were before those 5 years. How is stated the question means that if I go for a year or more and live in other country can apply again without the conduit paper. How would you know what have I done there?
67	anonymous	Again I think it should stay as it is for the safety of the public.

## Appendix E

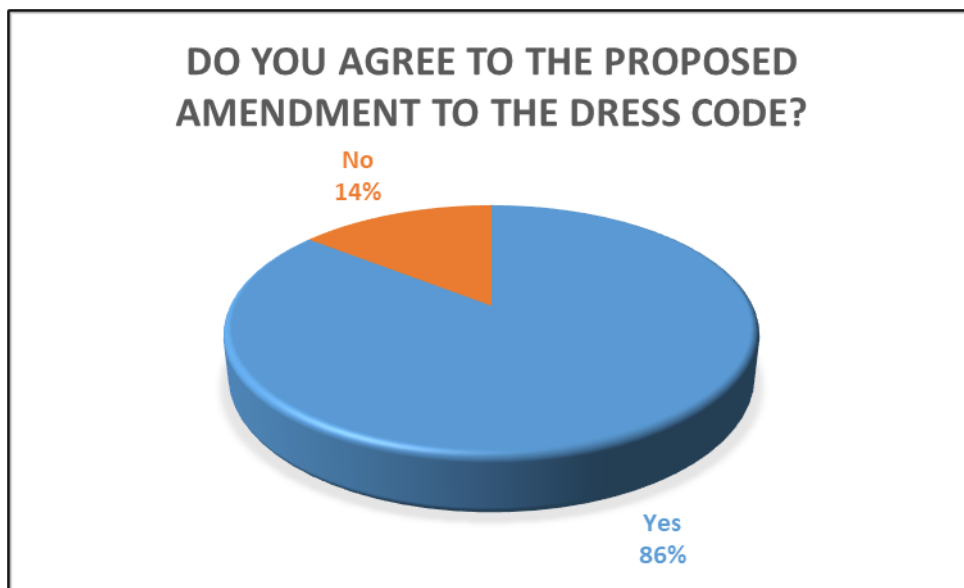
### Comments received in the online survey

#### Acceptable Standard of Dress (Dress Code)

Plymouth City Council proposes to permit the wearing of black denim jeans in the dress code.

#### Do you agree to the proposed amendment to the dress code?

376 responses were received. 322 (86%) were in favour of the proposal and 54 (14%) were against the proposal.



134 Comments were received

Plymouth Licensed Taxi Association response:

Yes; we believe that Taxi Drivers should be permitted to wear Jeans.  
No; we do not believe that there should be a colour restriction.

There is no material nor colour restriction on shirts and it is quite permissible to wear a blue denim shirt or even a green one with yellow dots. Individual Licensees wish to wear clothes to suit their own personality. May we point out that Royalty, the Clergy, Parliamentarians, Service personnel, even Councillors find it appropriate to appear on television in Jeans so why cannot Taxi Drivers for whom denim is a very practical material for the type of job being carried out.

Where we do agree with the LA is that all clothing should be clean and wholesome.

ID	Name	Responses
1	anonymous	Aslong as you are neat & tidy show your logo and your taxi badge i don't think it matters

ID	Name	Responses
2	anonymous	We need drivers and cabs on the road not ones who are dressed with a tie and suite
3	anonymous	Jeans are scruffy
4	anonymous	I don't think how anyone dresses effects there ability to perform to a high standard. I understand that in some circumstances that you would need to dress more formally, but for thr majority of drivers, jeans would be fine
5	anonymous	No
6	anonymous	It doesn't matter how you dress up as long as your clothes are clean and you look let's say smart dress,and more important is if your car is clean and in same time you have manners and help costumers when they need: bags , wheelchair etc. Everyone can wear trousers but if car is dirty and costumers are feeling disgusting to jump on it that's mean this rule doesn't help at all.
7	anonymous	No rips or motifs and black black denim not faded
8	anonymous	It's private hire so let them dress smart. Not black & white dress
9	anonymous	All drivers should be white shirt and black trousers with black shoes. A lot of customers have already commented on the dress code getting worse . Tower cabs and taxi first were always required to dress smart . It was always commented on by a lot of customers.
10	anonymous	Not just black jeans, blue jeans are perfectly acceptable dress wear, even your own councillors wear them on official business.
11	anonymous	Why only black? Why not blue as well? It is perfectly possible to have a set of blue jeans that look smart, a faded pair of black jeans will look no better or worse than blue
12	anonymous	Personally I think that all drivers should be able to wear what ever they want when driving, all the passengers care about is that they are driven in a safe environment from A to B.
13	anonymous	No
14	anonymous	the council officers need to be out on the road more often and check the drivers . They need to go to schools more often and check the drivers that do school runs because some of them they are not dressed like a taxi driver .
15	anonymous	I never wear Jean so this amendment doesn't make any difference to me I feel that we should be able to wear what we wish as I like to wear tracksuit bottoms and like to be comfortable when working a shift I've always looked clean and tidy when working
16	anonymous	Jeans may be deemed by some to be casual, but as long as the dress code is being monitored and any abuse of this is penalised, then I have no objections.

ID	Name	Responses
17	anonymous	N
18	anonymous	Wearing denim Black, blue red etc etc shouldn't be allowed you should look professional at all times and to be honest with you 50% don't.
19	anonymous	N
20	anonymous	It is more important for a driver to be clean and smart, rather than be concerned with what he is wearing. Some drivers have the personal hygiene of a skunk and their taxi interiors to match.
21	anonymous	I have no problem with blue denim either provided they are clean and not torn. Personally I prefer to dress for work on the assumption that my next job might be to a funeral but I can understand other drivers preferring not to wear a collar and tie.
22	anonymous	The dress code is fine and should be applied to all drivers. Some are really scruffy - t-shirts, jeans, track-suits should not be allowed
23	anonymous	Sitting in a car for 12 hours + you should be able to be comfy
24	anonymous	No
25	anonymous	No
26	anonymous	As long as they are black looks smart enough
27	anonymous	Dressing well-kept and clean, contributes to the image of professionalism. Customers feel safer and more confident that they are served by an experienced and dedicated driver. Customers can trust that the taxi driver will provide a safe and comfortable ride when they see a well-dressed driver. A driver's appearance can influence customers' perception of safety and professionalism.
28	anonymous	The biggest problem I see with many drivers, is not what they are wearing but the state of it. Messy dirty and smell. Uniform should be clean and smart. Shorts tailored, a collared top. Trainer if black or all white but clean. Trousers or black jeans but clean not fading or holes.
29	anonymous	I don't see what gives pcc any right to tell me what I can wear ,every driver is an adult and should be treated as such .pcc are not employer or parent of drivers .yes some drivers maybe dirty scruffy then pcc have enforcement officers who actually are unfit for purpose to tell drivers when they come across them .
30	anonymous	They should be able to wear smart casual.
31	anonymous	Some people look like a sack of @@@@ in a £1000.00 suit others the opposite as long as the jeans are black and not faded to grey ( that's the problem with denim)

ID	Name	Responses
32	anonymous	Most drivers already do wear denim black jeans.
33	anonymous	Why should it only be black jeans you should also be able to wear blue jeans as long as they are smart looking not ripped jeans if it's good enough for your councillors to wear them on official business surly it's good enough for taxi drivers to wear when working
34	anonymous	Don't see the problem in having to wear trousers to be honest,
35	anonymous	If the customer is new or travelling to the city and we are the first person they I think we should look smart to give a good image
36	anonymous	Dressing casually, meaning well-kept and clean, contributes to the image of professionalism. Customers feel safer and more confident that they are served by an experienced and dedicated driver. Customers can trust that the taxi driver will provide a safe and comfortable ride when they see a well-dressed driver. A driver's appearance can influence customers' perception of safety and professionalism.
37	anonymous	No comments
38	anonymous	Colour of clothing doesn't matter as long as it's clean and tidy.
39	anonymous	Taxi drivers expect to be treated as professionals & therefore should dress accordingly
40	anonymous	Could we also allow smart roll neck jumpers for winter time?
41	anonymous	None
42	anonymous	When a Driver looks smart he gives over a sense of professionalism, standards will slip and we'll all look like Hackney's.
43	anonymous	I think they should be free to wear what they choose, this is an out dated and sexist policy
44	anonymous	As long as the jeans are comfortably fit to the person and not impairing their mobility whilst conducting their duties.
45	anonymous	The requirements regarding the dress code should be relaxed. It should be entirely up to the driver what he or she is wearing as long as the clothes are clean and in good condition and they are not controversial. Regarding the private hire drivers, Operators should have the final word regarding the dress code for their drivers. Finally, blue denim jeans should also be allowed. Why black?!
46	anonymous	We should not spend extra money on dresses. We should work as normal people work.
47	anonymous	People can't get a taxi and I am sure they could not care what the driver has on

ID	Name	Responses
48	anonymous	As long as the drivers agree and understand the "Ripped or Teared " look is not appealing, whereas clean, tidy complete Jeans are perfectly fine. Again "Standards are in place to keep up quality service".
49	anonymous	I am female driver and I would like to wear a skirt in the summer, not pants otherwise I agree with the uniform
50	anonymous	No
51	anonymous	As long as we're smartly dressed including jeans should no t be a problem
52	anonymous	Your councillors even wear blue jeans so taxi drivers defo should be able to.
53	anonymous	Should be able to wear what we want
54	anonymous	Yes should be able to wear blue as well we are self employed in our own cars doing a job why should we be told what we can wear were not in school
55	anonymous	Anything smart should be allowed. Black jeans are smart
56	anonymous	We should be allowed to wear any colour jeans without rips as we're self employed Not employed by taxi licensing. IF the lord Mayor Mark shayer, Chaz Singh, Pat Patel, Luke Pollard, and Jonny Mercer Can all wear any colour jeans whilst working ( I can provide Photos) then so should us Cabbies be able to wear any colour. Your also not banning Religious Gowns within the Muslim community of taxi Drivers discriminative and hypocritical in my view.
57	anonymous	n
58	anonymous	n
59	anonymous	n
60	anonymous	n
61	anonymous	n
62	anonymous	n
63	anonymous	No reason why ALL DRIVERS cannot present themselves in clean and respectful attire
64	anonymous	No comment.
65	anonymous	Dress code should be Broad in generic terms.
66	anonymous	There's basically no difference between black trousers, chinos or black denim jeans..
67	anonymous	Why their should there be a "black" only denim trousers , it should be blue also.

ID	Name	Responses
68	anonymous	I am agree that we should wear a proper dress but no points in taxi licence
69	anonymous	Black trousers/skirt/ jeans and a white shirt.
70	anonymous	Denim jeans are denim jeans whatever the colour. PS why are you not wearing high viz jackets anymore? I was always led to believe that was your part of your uniform, just saying
71	anonymous	I don't think we should check the material of the trousers until they are elegant and well appearance.
72	anonymous	This isn't enforced anyway. The amount of drivers that I have had picking me up that are wearing dirty torn/ripped jogging bottoms is unbelievable
73	anonymous	I think comfy drivers are happier drivers
74	anonymous	It's common sense to permit the wearing of black denim jeans in the dress code!
75	anonymous	As long as the jeans are smart and clean
76	anonymous	No
77	anonymous	As long as the driver is dressed smart and tidy.
78	anonymous	Companies usually have a uniform, dress code, majority have black trousers, so can't see a reason why black jeans, should be excluded.
79	anonymous	Could be black or grey
80	anonymous	No
81	anonymous	I think taxi drivers should be permitted to wear any form of bottoms that are black and look professional, whether they're denim jeans or any other form of trouser (Excluding loose fitting tracksuit bottoms)
82	anonymous	Try enforcing the dress code the clothes some wear is ridiculous ..... Try enforcing the existing policy is not rocket science.... Just stand around the ranks take down numbers etc and you'll get them all but if you are speed the word gets around and the offender's go elsewhere
83	anonymous	No
84	anonymous	Providing he are not faded or ripped
85	anonymous	Aa long as they are not faded and should go back to white shirts or company uniform licencing are doing enough to catch people not wearing collared shirts
86	anonymous	Some trousers are very similar to jeans



ID	Name	Responses
87	anonymous	Not for the City Council to tell self employed workers what to wear!
88	anonymous	I believe that private hire should wear the uniform of the office they work for. And hackney drivers should wear smart attire. Believe as long as it's smart casual it shouldn't matter. Can be jeans as long as not ripped and no offensive logos/writing.
89	anonymous	Jeans are smart hard wearing and warm 90percent of the population wears or owes a pair of jeans
90	anonymous	I think as a self employed driver, we should be allowed to wear Jeans and trainers.
91	anonymous	Blue Jeans would be ok too. Providing they are clean and free from holes et cetera
92	anonymous	The pockets should not matter.
93	anonymous	Denim jeans should be ok for wearing while working
94	anonymous	As long as they are clean and tidy with no designer holes in them
95	anonymous	No jeans . No Track bottoms .
96	anonymous	Denim jeans should be ok
97	anonymous	Denim jeans should be ok to wear while working
98	anonymous	Nope
99	anonymous	Drivers should be allowed to wear whatever they please as long as it is clean and in good condition, it would help if the driver was also clean and in good condition. Someone could be in black dress shoes, trousers a shirt but if it's filthy and ragged how is that more acceptable than a chap in smart, clean trainers, shorts and t-shirt? I understand it a difficult balance.
100	anonymous	Denim jeans should be ok wearing while working
101	anonymous	YES IF U WANT US TO WEAR WHAT U SAY THEN GIVE US SOME MONEY TOWARDS IT AS WERE SELFEMPLOYED WORK IS HARD AS IT IS AND THE STUFF UR TELLING ME TO WEAR IS NOT MY KIND OF CLOTHES
102	anonymous	The colour of a driver's trousers or jeans doesn't matter as long as the are clean and in good order
103	anonymous	No
104	anonymous	Let them wear what they want I could not care

ID	Name	Responses
105	anonymous	This should not be limited to "Black". Denim is perfectly acceptable in any colour.
106	anonymous	All drivers should be of smart dress
107	anonymous	How a driver looks has no bearing on the job
108	anonymous	Drivers have different personal pride and still wear whatever they want, regardless of condition or colour so being allowed to wear black jeans won't make much difference to some who have no personal pride in their appearance
109	anonymous	i never looked at what a driver has on
110	anonymous	All forms of wear should be allowed within reason
111	anonymous	Black jeans look smart if not ripped
112	anonymous	Denim is a material made in many different colours all of which look good. The amendment should read denim is ok as long as its not ripped\ torn \or patched\or multi coloured.
ID	Name	Responses
113	anonymous	Black denim is good for our body, this country is hell of cold!
114	anonymous	But unfortunately even if this goes through drivers will still wear blue denim and joggers etc, and look scruffy still and get away with it as there is very very little enforcement these days I guess this must be done to lack of resources, but we currently have a very scruffy looking fleet of vehicles and drivers in Plymouth, I have mentioned this in our quarterly trade meetings with taxi licensing
115	anonymous	Wearing jeans of any kind makes no sense to exclude them from the picture (blue) or black I think that the fact is the how clean they are nor what we wear.... Or how we wear it..
116	anonymous	No
117	anonymous	I have never thought "look at the state of the driver"
118	anonymous	We are taxi drivers not fashion models so it doesn't matter what we wear as long as it is decent and professional.
119	anonymous	If they are clean, why not?
120	anonymous	There self employed
121	anonymous	Black smart trouser

<b>ID</b>	<b>Name</b>	<b>Responses</b>
I22	anonymous	Smart shirt and trousers should be worn
I23	anonymous	Smart clothes regards any color
I24	anonymous	No
I25	anonymous	Dress code aslong as it's smart and not scruffy
I26	anonymous	Black denim jeans looks professional. And they are durable and quite warm which is needed in this job.
I27	anonymous	While I think uniform and smart is good, I think the majority of customers just want to get from a to b. I sometimes think that the customers could do with a good shower and smartning up.you at licensing don't see this
I28	anonymous	Denim jeans should be ok for wearing while working
I29	anonymous	I agree that Jeans can be worn but why restrict to black denim when denim can be a variety of colours including blue, which as long as they are clean and in good order should be acceptable.
I30	anonymous	Yea there smart
I31	anonymous	The jeans are worse than the sport ones?
I32	anonymous	There is nothing wrong with black jeans or any other colour of jeans. I could wear any colour trousers but not blue jeans???
I33	anonymous	No one cares and just wants a taxi

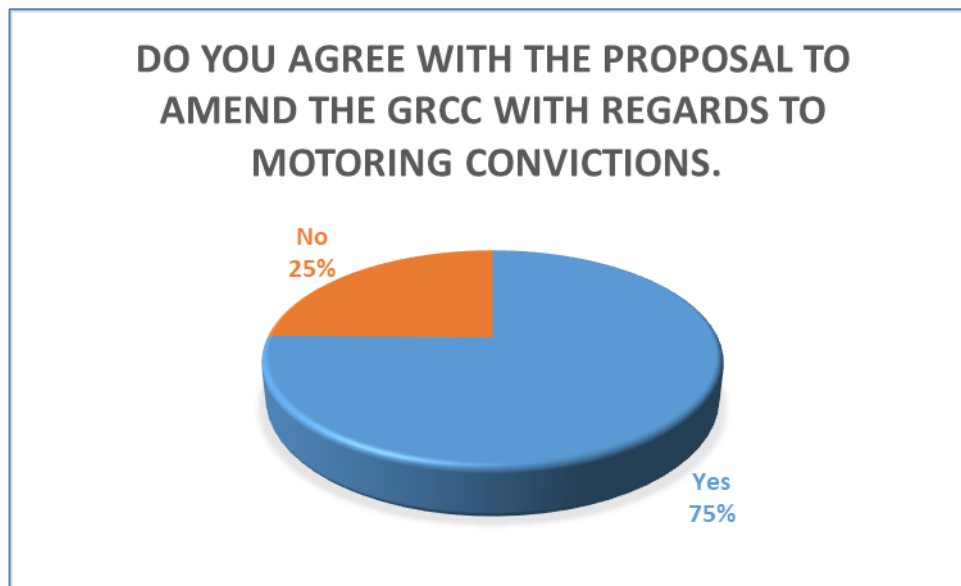
## Appendix F

### Comments received in the online survey

#### Private Hire Driver and Hackney Carriage Driver New Driver Applicants Driver Endorsements

Do you agree with the proposal to amend the GRCC with regards to motoring convictions.

371 responses were received. 279 (75%) were in favour of the proposal and 92 (25%) were against the proposal.



65 Comments were received.

Plymouth Licensed Taxi Association response:

New Driver Applicants should be treated in the same manner as existing Licensees.

Where an Applicant has reoffended for the same offence closer scrutiny should be applied.

ID	Name	Responses
1	anonymous	Its very easy to pickup speeding points and however wrong it maybe that doesn't make them a bad driver or a danger. As long as a driver hold a valid licence and DBS is clear then they should be allowed to drive as long as the points are not for drink and drugs
2	anonymous	No
3	anonymous	Plymouth Taxi licensing Council has to on drivers side. I drive one car with two license ( taxi license) and (DVLA ) license but two separate places to get points from. Not fair

ID	Name	Responses
4	anonymous	If we have drivers who accumulating points and have 12 or more but yet are still able to retain their drivers license should the committee not be asking the question as to whether these people are fit to drive? Especially if there is a common pattern in their accumulation of points. I know one driver who in the space of six weeks accumulated nine points, what does that say about their driving? And how does that reflect the professional standards that we are trying to achieve within the Taxi industry
5	anonymous	All drivers should be a driver with a safe and reliable record in accordance with the laws of the land.
6	anonymous	No
7	anonymous	I think it should stay as it's very important as having point means you have broken the law at some point and it avoids the dangerous drivers being out here on the road
8	anonymous	Minimum standards need to be applied.
9	anonymous	N
10	anonymous	N
11	anonymous	No
12	anonymous	No
13	anonymous	Driving points does not make anyone a criminal, in this day and age with stupid speeding camera,s everywhere it's a hazard of the job.
14	anonymous	I can understand a taxi driver receiving 3 speeding fines in 12 months doing 50,000 miles but a new driver having 9 points in the last 12 months probably driving a fraction of that, what happens when they start driving for a living and probably believing that the faster you drive the more money you earn ( a common thought with new drivers)
15	anonymous	Private hire drivers, in a way, represent the taxi company they work for. Therefore, dressing appropriately helps maintain a positive company image. Some cities or jurisdictions may impose rules and standards regarding how private hire drivers must dress. These regulations may vary by location.
16	anonymous	no
17	anonymous	None
18	anonymous	I had a clean licence when I first became a taxi driver, within 12mths I had 6points due to being tired late into the night. I'd never had points before, what will happen if they start with 6points and receive 6 more in 12mths.

ID	Name	Responses
19	anonymous	Please remember that taxi drivers are self-employed. They should not be punished twice for the same offence. The points and convictions on the licence should not be of any interest to Plymouth City Council.
20	anonymous	When drivers banned by DVLA, it should return license to council. When ever he get the license back ; the driver should be eligible for requesting license back and carry on work.
21	anonymous	As long as they hold a licence
22	anonymous	Leave the system the way it is, Transparency is essential, If a driver has anything on his/her licence it should be stated and if need be investigated, let's not make it easier, a driver should have nothing to hide.
23	anonymous	Being a taxi driver I know that sometimes misunderstanding can occur so I don't see why they would be punished, then there would be drivers who would be out of work due to a misunderstanding
24	anonymous	No
25	anonymous	n
26	anonymous	n
27	anonymous	n
28	anonymous	n
29	anonymous	n
30	anonymous	n
31	anonymous	No comment
32	anonymous	Consistent approach for current and new drivers
33	anonymous	NO
34	anonymous	No
35	anonymous	No
36	anonymous	No
37	anonymous	welcome to the 21st centre
38	anonymous	All convictions for old Laira road should be ignored it's a ridiculous speed limit which even the most careful of drivers fall foul to
39	anonymous	No
40	anonymous	No

ID	Name	Responses
41	anonymous	Everyone should be treated the same whether they are new or existing drivers.
42	anonymous	No
43	anonymous	No comment
44	anonymous	No comments
45	anonymous	Probably makes sense.
46	anonymous	No
47	anonymous	All drivers should be treated equal
48	anonymous	No
49	anonymous	As long as they are legal to drive
50	anonymous	It is very easy to pick up points and doesn't make a driver more unsafe unless for drink or drugs and they should never be allowed a taxi licence.
51	anonymous	Do you want drivers with bad previous driving experience, points etc on the roads of Plymouth let alone dealing with the public??????? Beggars belief
52	anonymous	We all get points and its to easy to get points
53	anonymous	Again
54	anonymous	Skin off every one!
55	anonymous	No
56	anonymous	To much pressure on drivers
57	anonymous	High standards of driving should be kept at all times.
58	anonymous	No
59	anonymous	Dvla and Devon and Cornwall police problem to police not Plymouth city Council to play God its simple if a new driver or an existing driver has endorsements on his licence when applying for new or existing licence you flag it to go to the committee
60	anonymous	I don't think the point system is required. Serious offences can be seen on our license checklist for applications however we should still have to inform you of Serious offences,ie no tax or insurance
61	anonymous	No comments
62	anonymous	NO

ID	Name	Responses
63	anonymous	All drivers must respect same rules
64	anonymous	Everyone gets points, it is a hazard and instead look at people who have crashed, been drunk or smoke weed



## Appendix G

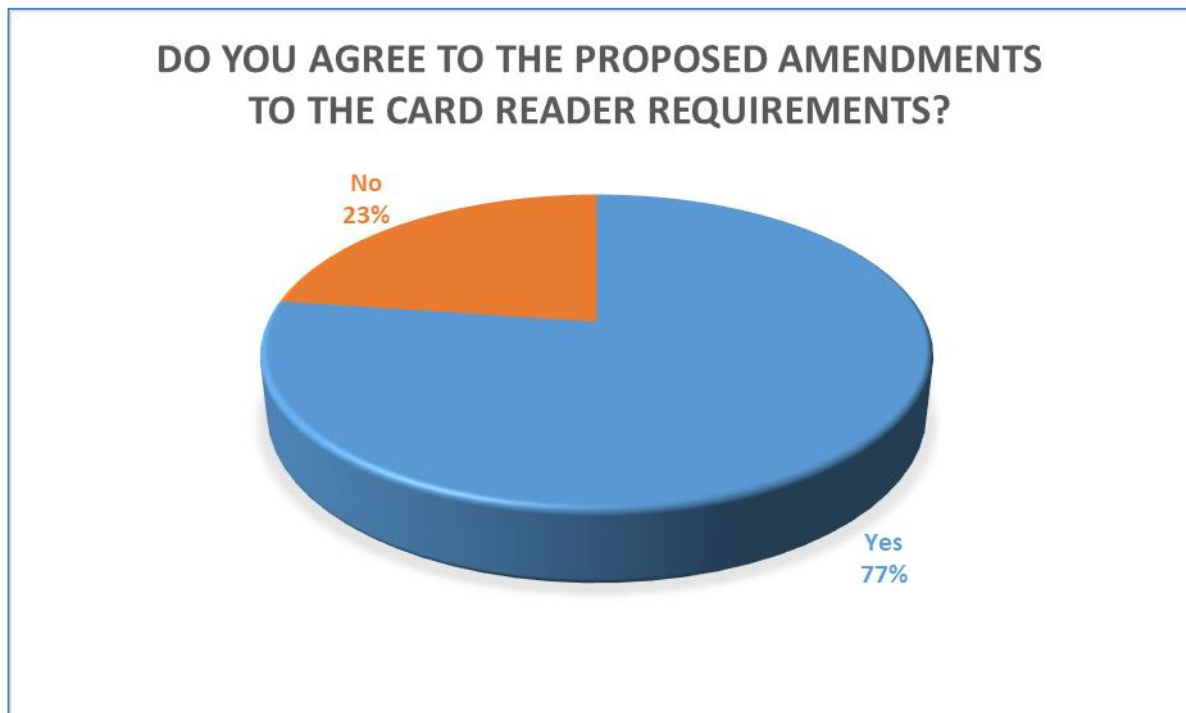
### Comments received in the online survey

#### Card Payments

It is proposed to amend the hackney carriage and private hire vehicle conditions to ensure that working card readers are always used and remove the requirement for locating the card readers in fixed positions.

#### Do you agree to the proposed amendments to the card reader requirements?

372 responses were received. 287 (77%) were in favour of the proposal and 85 (23%) were against the proposal.



100 comments were received.

Plymouth Licensed Taxi Association response:

Yes, if carried then a card reader should be in working order. It should be an optional choice and not imposed. There are many areas within and without Plymouth where there is no signal. There are also occasions when there are insufficient funds in a passenger's bank account. Outages also occur when the clocks alter and servers are down.

We refer to Executive Decision 7.5 9.2: For the above reasons it is not possible to ascertain whether a card reader will work when the vehicle, driver and passenger arrive at the final destination whether inside or outside the LA area. Drivers should not be punished in this event.

ID	Name	Responses
1	anonymous	Card readers should be at the drivers discretion
2	anonymous	My card reader will not work in busy areas at busy times due to the network overloaded.
3	anonymous	No
4	anonymous	Cash payment should always be an option, not everybody has a bank card.
5	anonymous	First card payments depend heavily on cellular phone network signal which is not always available,or client card not working in many cases specially at night, second why should I be forced to take lees money(because of the fees) than cash for the same fare,sometimes making a big difference in earnings?
6	anonymous	The card reader should be available only if the self employed driver requires to have one
7	anonymous	I still feel it should be a drivers own decision on whether or not he wishes to take card payments, should not be forced upon us.
8	anonymous	Card readers are so readily available and accessible these days that's not having one that works is really an invalid excuse for refusing to take a card payments. I agree that having a card reader in a fixed position should not be a prerequisite as in some ways it is neither practical or possible.
9	anonymous	As card readers are to used by all drivers, then the council should make sure drivers adhere to the rule and not refuse, it would be a good idea if the council advertised the fact to the public using Taxis, that cards are to be accepted in all Hackneys and Private Hire, it is wrong that a lot of drivers still refuse card payments and get away with it.
10	anonymous	80% of the clients at this moment are paying with cards
11	anonymous	No
12	anonymous	No keep them hand held as it avoids extra cost and being a Saturday night driver I've had my cab vandalised on more than one occasion it's just one less thing to replace and with mobile phone devices we use the hand help works better think we are going a bit of head of time with this
13	anonymous	N
14	anonymous	N
15	anonymous	Licensing should do random checks on drivers card reader records to ensure they are taking card payments. Every day I get complaints from the public about drivers refusing card payments.
16	anonymous	I would find it unpractical for the card reader to be in a fixed position. Bluetooth connectivity means it can be used anywhere within the vehicle.

ID	Name	Responses
17	anonymous	Cash needs to be retained and should be encouraged. Card payments are not always possible
18	anonymous	Not always used, but always available. Some of my customers prefer cash and that's the way it should stay. Half cash half card.
19	anonymous	No
20	anonymous	No
21	anonymous	Using bank cards is much more convenient than handling cash. The card reader enables quick and easy payments in places such as shops, restaurants or online. Bank cards offer high levels of security, such as PIN authentication or fingerprint authentication. This reduces the risk of theft or loss of money.
22	anonymous	Firstly pcc shouldn't have any rights to tell any driver they have to accept card payments. It is wrong to force any driver to use a card reader and accept charges for it .
23	anonymous	Should still be able to use cash
24	anonymous	All drivers ( Business owners) should accept card payments and any who refuse to take a card should be punished
25	anonymous	I would like to keep the card reader away from the customer so it's safe and away from any customers who would either steal or damage
26	anonymous	Using bank cards is much more convenient than handling cash. The card reader enables quick and easy payments in places such as shops, restaurants or online. Bank cards offer high levels of security, such as PIN authentication or fingerprint authentication. This reduces the risk of theft or loss of money. Using bank cards helps reduce the amount of cash a person has to carry, which can reduce the risk of loss or theft. Some bank cards offer rewards or cashback on spending, special offers at merchants, or insurance for travels.
27	anonymous	Every car needs to have a working card reader displayed to the customer site
28	anonymous	Card readers should be retained by the driver & never left or fixed in a position where they could be tampered with
29	anonymous	None
30	anonymous	If the card's are fixed you can't insert the card's when required to verify ownership.
31	anonymous	No
32	anonymous	Card payment is the necesaty in this modern world ;all drivers should take card payment.
33	anonymous	Bad signal in the city means card readers are at times pointless

ID	Name	Responses
34	anonymous	Again, it's safety for the driver and the General Public. It's the way the world is going anyway.
35	anonymous	We must all have a card rider
36	anonymous	No
37	anonymous	We should have a choice as to whether we take cash or card payments and not bullied and threatened with suspension, court Action, and our livelihoods into taking card payments it's putting a lot of Drivers under pressure. We should be allowed to charge the extra commission we pay. You allow us to put 10p on fuel when it's a certain price. Plus Nobody in licensing would like a commission taken from their wage each month for having their wages payed into the bank would they.. we're self Employed and should have the option..
38	anonymous	n
39	anonymous	n
40	anonymous	n
41	anonymous	n
42	anonymous	n
43	anonymous	n
44	anonymous	I have recently had training in the use of a card reader and it would greatly assist disabled fares in payment.
45	anonymous	I've had card readers in my vehicle for over 3 years now. And I can assure you that they work when and if they want to. The driver has very little control over wether the device will work or not. Especially at the outskirts of Plymouth, where reception is very bad. "Working" card readers should be an optional requirement, because a driver can have 10 of them and none of them could be working, without the driver being at fault for it.
46	anonymous	I am self employed. Are the council willing to reimburse me for any transaction fees if it's made compulsory.
47	anonymous	NO
48	anonymous	We still have a lot problem with card payment
49	anonymous	People like to see that they can pay by card. Instead of keep being told that they must pay cash or go to a cash point.
50	anonymous	It doesn't need to be in a fixed position but should be available when needed, but not a condition that you have to use a car reader. It should be a drivers choice for cash or using a card, they are self-employed and not employed by you

ID	Name	Responses
51	anonymous	No
52	anonymous	Every transaction on card readers has to be paid by taxi drivers this means my income will be lower; should I be happy about that? In some occasions the card reader doesn't work and customer leave without paying, does it help me this?
53	anonymous	Common sense
54	anonymous	No
55	anonymous	Not all customers are able to pay by card.
56	anonymous	No
57	anonymous	If this rule is implemented, which given the growing reliance on cashless methods of payments it should be, the rule should stipulate that the card machine must be able to display the amount to be charged. The card readers should have to be registered to display the transaction as coming from the a Plymouth taxi and should also include the Taxi registration number, to aid with identification should a billing issue arise.
58	anonymous	I'm not putting my card reader in the back where it can be tampered with by idiots. I show my reader to customers as it works through the dividing screen.... Also cans should not be allowed to work without a working card reader and not given the days to get a new one... There available from Screwfix so there's no problem getting a new one
59	anonymous	No
60	anonymous	Still alot of drivers Still refusing card payments should be inforced by licensing and more checks done
61	anonymous	Lots of drivers refusing card payments expecially black cabs on sat night stopping outside post office mutley plain
62	anonymous	You need to crack down on card payments too many refusing them just sit on Mutley plain from midnight until 4am and watch the drivers take customers to cash points.
63	anonymous	Too many refuse it if taxi drivers want an income they should accept all forms of payments. However, do not agree with the offices and the card company's taking a percentage of the money earned because of the card payment. Taxi companies are charging drivers a fee to be able to claim the money they have earned to go into their bank accounts. As a local authority you also license takeaway outlets which too many are of them only accept cash!
64	anonymous	We have a card reader but it isn't working everywhere, I took a job to Cornwood Village and they wanted pay by card but we had no signals so we couldn't complete the payment and when they wanted to go to the cash machine I said thos will cost you more than what I said, they have accepted but they could refuse easily, this is just one of the facts.

ID	Name	Responses
65	anonymous	Should not be made to have a card reader due cost associated with card fees And availability of a car reader at short notice if it stop working.as we are not all IT illiterate
66	anonymous	They get broken by members of the public especially when they are drunk.
67	anonymous	Many times when outside of the city we can't get the signal so we need to put this into consideration
68	anonymous	Yes , but we all have some issues. Like No signals especially outside the city, so many time there cards been declined . And even some time they have No change to pay by Apple Pay .This is happens every week .
69	anonymous	Many times when outside or inside of the city we can't get the signal so ended up losing fares so we need to put this into consideration
70	anonymous	Cash is King
71	anonymous	Very sensible, fixed card readers are open for abuse/vandalism, particularly in hackney carriages. Need to ensure that all drivers are willing to accept card payments though, this isn't the case at present.
72	anonymous	Many times when outside the city we can't get signal so we need to put this into consideration
73	anonymous	CARD READERS SHOULD BE OPTIONAL IN SOME AREAS THERE ARE NO SIGNAL
74	anonymous	Should be a drivers choice and not imposed on them because modern technology fails
75	anonymous	No
76	anonymous	My card in the shop only works at times due to signal
77	anonymous	There will always be Two problems. 1. No signal to complete the Card Payment. 2. No Funds to complete the Card Payment.
78	anonymous	We need to keep cash alive
79	anonymous	Totally agree EVERY driver MUST have a card reader but unsure about permanent positioning of reader.
80	anonymous	Unsure
81	anonymous	It should be the choice of the company or individuals
82	anonymous	Make payment easier
83	anonymous	dont know anybody with a fixed card reader as you need to get out the cab and walk around to try and find a signal whilst hoping the customer stays calm.

ID	Name	Responses
84	anonymous	Many old pearsons pays cash...you ask me to refuse!!! Are you mad?
85	anonymous	A card reader should be as important as your drivers badge you must have this with you at work at all times most customers want to use card these days also the Sum up card payment app now does not need the card reader to take payment you can actually y use your phone also to accept payment
86	anonymous	Not all card readers work well and if the person has no money in their bank account we lose time and money with those customers...
87	anonymous	No
88	anonymous	It doesn't matter where the card reader is as long as it works.The drivers are paying all the fees so somehow the council should help,also loosing most of tips which is a lot.
89	anonymous	We want some short of security of drivers, customer who don't pay and run off giving threats to drivers who ask them for their fare.
90	anonymous	No
91	anonymous	Nope
92	anonymous	it is good idea to remove requirement for locating the card readers in fixed positions as sometimes you need to give them to customer, sometimes you are giving them to customer when he is outside vehicle. Card payments suppose to be available for customers in every PH or Hackney Vehicle.
93	anonymous	Sometimes card readers are temperamental so I think there should be give and take but personally think they are good and it would cause me unnecessary problems without a reader
94	anonymous	Cannot guarantee on a card machine always working, I have used numerous makes and have experienced them freezing and stop working at least 6/7 times
95	anonymous	Many times when we are outside of the city we can't get no signal so we need to put this into consideration
96	anonymous	I think that providing should be a personal business choice for the driver, I have used a card reader for many years and there can be numerous problems involved in giving the customer this choice particularly when alcohol comes into the equation. In a retail environment the payment is taken before goods are supplied, in hospitality the customer pays before leaving the premises, taxi drivers have to provide the service and then hope that the customer:- I has enough money in the account, 2 that the phone signal is adequate for the transaction to work, 3, if the transaction is done and later on the customer says it was not them, 4, if the card does not work, you have to take the customer to a cash point, do you charge the customer for the extra distance and time or does the driver have to loose it. This list is not exhaustive.

ID	Name	Responses
97	anonymous	Most of the time is not the card reader. Is the network issues. I have many nights I go early at home because of network issues. I don't want to start talking about network coverage
98	anonymous	Cash should always be in use as a form of payment
99	anonymous	I can't get a signal in the city



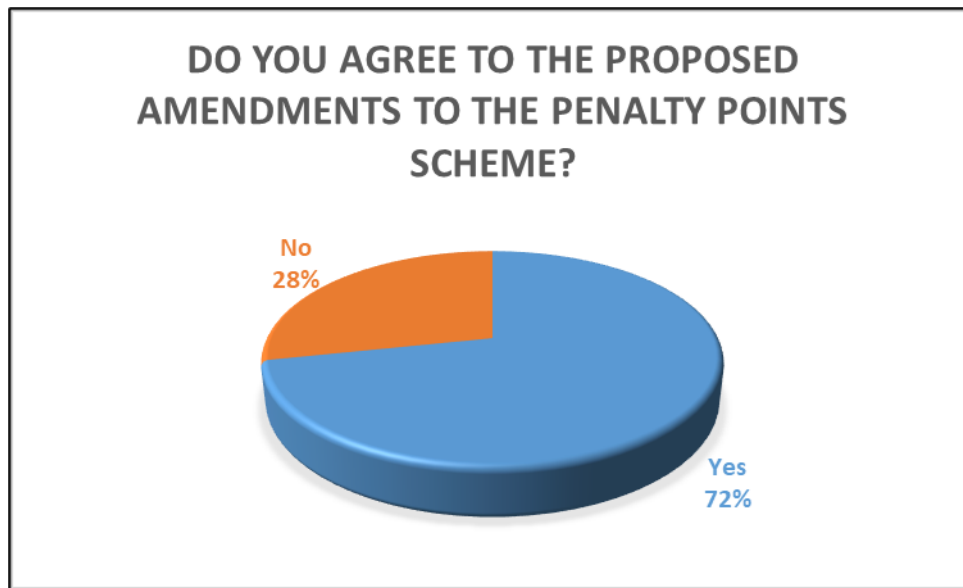
## Appendix H

### Comments received in the online survey

Private Hire and Hackney Carriage Penalty Points Scheme - Part One

Do you agree to the proposed amendments to the Penalty Points Scheme?

371 responses were received to the question 266 (72%) were in agreement with 105 (28%) not in agreement with the proposals.



71 Further comments were received and are shown below:

Plymouth Licensed Tax Association response:

Thirty six months is too long a period. There should be a rolling period of twelve months after which time the 'Points' should drop off the list.

A repeat offender for the same offence could perhaps be treated more severely.

ID	Name	Responses
1	anonymous	Should be kept at 12 months incase something happens in the next 24 months after
2	anonymous	I gained 12 points within 2 weeks back in November 2020. It was wrong of me but because of the pressures it has made me a worse driver in my eyes.
3	anonymous	Yes, licensing officers should receive points the same his drivers are not doing their job as there is about six taxi ranks in Plymouth, what you cannot park on as private vehicles are parked there rank one HMS Drake rank two Saint Budeaux Three barcode rank four Derry's Cross roundabout by the Theatre Royal write five pizza express Derry's Cross. Ring six octagon ranks seven after

ID	Name	Responses
		7 o'clock night times Iceland, Mayflower Street rank eight Albert Road as you cannot park on these ranks because our private vehicles being parked on them. Thank you
4	anonymous	No
5	anonymous	If I have accumulated 12 points over a 36 month period then the committee needs to look at what I have done to accumulate them and how quickly I have accumulated them. I do not believe that they should be classified as spent once the committee has sat and discussed this matter, they should Drop off when those points have expired and they should serve as a warning to the driver not to continue with that activity that has gained them the points in the first place
6	anonymous	As long as the council says they are safe to drive members of the public then that should be fine.
7	anonymous	This comitee has to much power.They are not always corect in there judgment
8	anonymous	No
9	anonymous	I have never really agreed with this we have rules to follow just do as your told to avoid the points it's really not the hardest thing in the world
10	anonymous	N
11	anonymous	N
12	anonymous	No
13	anonymous	No
14	anonymous	Punitive
15	anonymous	The commission must take into account which crimes the penalty points were taken. the points taken on the basis of speed, passing a red light and dangerous driving should not be eliminated.
16	anonymous	I find it difficult to believe that the proposal may accept a new driver who has accrued 9 driving points in 12 months also says that accumulating 12 points ( for often minor offences) in 36 months has to appear before a council committee?????????
17	anonymous	Don't agree with the penalty point scheme in the first place
18	anonymous	no
19	anonymous	None
20	anonymous	You should scrap the Penalty Points Scheme altogether. We already have lots of things we need to deal with. All the breaches of conditions of the licence should be considered a case-by-case scenario.

ID	Name	Responses
21	anonymous	No
22	anonymous	No
23	anonymous	I think it's the best rule applied until now
24	anonymous	No
25	anonymous	A formal warning should be sufficient
26	anonymous	If you get to many points with the dvla you get banned end of.
27	anonymous	n
28	anonymous	n
29	anonymous	n
30	anonymous	n
31	anonymous	n
32	anonymous	n
33	anonymous	A fairer system would be beneficial sometimes a little education is all that's needed
34	anonymous	The proposal would be different from the criteria used by the police and DVLA. The criteria should be the same.
35	anonymous	The whole point system is ridiculous. Every offence should be treated separately and patterns discussed individually. Also, you should have at least one person in the licensing department that has experience of working as a taxi driver, or in a taxi office, as your enforcing officers are sometimes considering we should be robots who follow rules to the absolute TEE, and allow zero tolerance to even the most unimportant regulations..
36	anonymous	The penalty points system is based purely on hearsay and personal opinion ie personal hygiene: what someone might see as smelly. To remove someone's livelihood based on this system is legally wrong.
37	anonymous	NO
38	anonymous	We don't have to put this type of pressure on driver
39	anonymous	36 months is too long, we are humans, we can do mistakes
40	anonymous	No
41	anonymous	No
42	anonymous	No

ID	Name	Responses
43	anonymous	Just a time consuming and worrying period for any driver.... Not been there yet but I imagine it's stressful enough dealing with courts etc without you getting on our backs..... Having said that if it's a serious violation then perhaps they deserve it but minor infringements like breaking the limit on old Laira road should be not included
44	anonymous	No
45	anonymous	No
46	anonymous	No
47	anonymous	36 months is just too long 12 months maximum. we-are talking about peoples livelihoods here, and it's very difficult to drop off in Plymouth legally there's no parking bays for private hire to pick up or drops off in the city. It's getting very stressful, thank God for Marks & Spencer's pick up area. It seems to be the only way to access city centre without getting a ticket or some sort. Or you need to by train or bus? Not good for people with disabilities or elderly et cetera. While are we on this matter? can we have more toilets please 24 hours would be good thank you. I am sometimes put off working at night or early mornings, due to lack of toilet facilities around the city et cetera
48	anonymous	I think it is just to look into trouble as this job is enough stressful
49	anonymous	I believe should look into the case because this job full of stress
50	anonymous	I think it is just to look into trouble as this job is enough stressful
51	anonymous	Sounds ok.
52	anonymous	I think it's just to look into trouble as this job is enough stressful
53	anonymous	THIS IS PLAYGROUND STUFF WE ARE WORKING POEPL AND THIS POINT SCHEME IS RIDICULOUS
54	anonymous	Far to long a period 12months is long enough
55	anonymous	No
56	anonymous	We need drivers
57	anonymous	I don't see the requirement for a points system at all. The Driver receiving points has no way to Appeal against the issue of points. If a Driver has allegedly Offended, the Taxi Committee, not Licensing Officers should decide on penalties.
58	anonymous	Don't really understand the question but if a driver has points then if they reach 12 or more they should be allowed to drive if the points are for minor infringements such as driving at 35 in a 30 zone as most people do the same
59	anonymous	No

ID	Name	Responses
60	anonymous	No comment
61	anonymous	If you penalty old and good,experiented drivers...who will represent this city to tourists? You???
62	anonymous	No
63	anonymous	No
64	anonymous	No
65	anonymous	No
66	anonymous	Plymouth city Council playing god again with a person's livelihood if a driver does something wrong reprimand them there and then if he gets 12 points in 3 yrs for silly things is not the end of the world
67	anonymous	Don't agree with the points scheme anyway.
68	anonymous	I think it's just look into trouble as this job is already enough stressful
69	anonymous	I think that points should only last for 12 months and then be removed from the record, keeping them on record for 3 years for minor misdemeanors that do not affect the safety of the vehicle or passengers is bullish and could be misused to the detriment of owners and drivers, it could also lead extra unnecessary work for the licensing committee .
70	anonymous	Silly idea TBH
ID	Name	Responses
61	anonymous	If you penalty old and good,experiented drivers...who will represent this city to tourists? You???
62	anonymous	No
63	anonymous	No
64	anonymous	No
65	anonymous	No
66	anonymous	Plymouth city Council playing god again with a person's livelihood if a driver does something wrong reprimand them there and then if he gets 12 points in 3 yrs for silly things is not the end of the world
67	anonymous	Don't agree with the points scheme anyway.
68	anonymous	I think it's just look into trouble as this job is already enough stressful

ID	Name	Responses
69	anonymous	I think that points should only last for 12 months and then be removed from the record, keeping them on record for 3 years for minor misdemeanors that do not affect the safety of the vehicle or passengers is bullish and could be misused to the detriment of owners and drivers, it could also lead extra unnecessary work for the licensing committee .
70	anonymous	Silly idea TBH

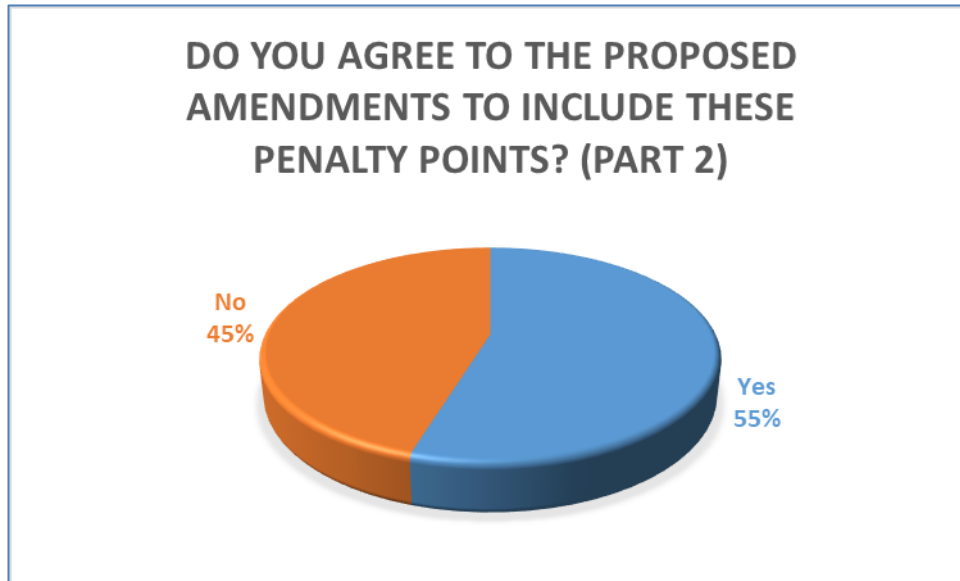
## Appendix I

### Comments received in the online survey

Please note, this document only includes the questions that ask for comments in the online consultation questionnaire.

Private Hire and Hackney Carriage Penalty Points Scheme - Part Two

Do you agree to the proposed amendments to include these penalty points?



369 responses were received to the question 2202 (55%) were in agreement with 167 (45%) not in agreement with the proposals.

95 Comments were received and are shown below:

The PLTA were in favour of penalty points for incorrect signage but not for card reader/card payments.

ID	Name	Responses
1	anonymous	Agree to all except card,machine
2	anonymous	TBH we want more cars and a deregulated system to bring more cars into the system
3	anonymous	For the signage yes I do. For not having a card machine, no. There are many times that the machine may not be working and these would have yo be taken into consideration
4	anonymous	No
5	anonymous	For incorrect signage yes, but not for card readers

ID	Name	Responses
6	anonymous	Should be no penalty for not providing a working card reader.
7	anonymous	I don't think a self employed taxi driver should be told he must have a card machine
8	anonymous	In rare situations card machines dont work because of signal or other issues that appear during journey. So its unfair to be penalised for something that its not your fault.
9	anonymous	Card machines are very often unreliable a week's grace should be given
10	anonymous	If the card reader goes down as doesn't work they should not get points but given 3 to 5 days to make sure they have a replacement
11	anonymous	Agree with it for signage but not for having a broken card reader.
12	anonymous	I agree, too many vehicles are now running round Plymouth that are incorrectly signed or have door badges that are magnetic or don't have a rear plate. Additionally there are some drivers who refuse to take card payments, therefore discriminating against those who wish to make payment by card
13	anonymous	Totally and about time, drivers have been getting away with not allowing cards to be used by passengers for far to long.
14	anonymous	No
15	anonymous	I strongly believe the cars should be sign written i a strong believer in this as for the card reader I feel we should be able to decide weather we take cash or card that should be are choice
16	anonymous	Not displaying signage of the Operator you are currently working for, is in my opinion, a serious safeguarding issue and also leads to passenger confusion and the number "No Fares" increasing.
17	anonymous	N
18	anonymous	N
19	anonymous	Personally, I wouldn't work if I had no provision to take card payments even temporarily. It is now the the most prevalent way to pay. I also have a back up card payment facility available but of course, the lack of mobile data signal in beyond anyone's control.
20	anonymous	I disagree with be forced into a cashless society
21	anonymous	Don't be ridiculous
22	anonymous	No
23	anonymous	No



ID	Name	Responses
24	anonymous	All cars and drivers must respect the rules of the community
25	anonymous	To many stickers on the cars are destroying the paint work and cost to much when selling cars on.
26	anonymous	Who are pcc to give any driver penalty points which is not a legal penalty point. Pcc should be able to advise drivers or reprimand drivers but not to give out so called points
27	anonymous	No
28	anonymous	It is important for taxi drivers to obey traffic rules and drive safely to avoid accumulating penalty points.
29	anonymous	Everyone needs rules
30	anonymous	They're a lot of places in Plymouth that we don't have phone signal,so the card reader is not working(ex: Priory Road, North Hill,Tamerton Foliot and many more)
31	anonymous	no
32	anonymous	None
33	anonymous	My customer's always tell me hackney's don't take card's only cash. And that was last said to me Friday.
34	anonymous	Again, please remove the Penalty Points Scheme.
35	anonymous	No
36	anonymous	Not a great system TBH and just in place to give someone a job feeling important
37	anonymous	Every driver must understand the rules and regulations are there as a standard for all, there is no victimisation intended.
38	anonymous	It's stupid, maybe my card reader doesn't have a signal or maybe it's just broken until the next one comes, it might take a week this would mean I can't work anymore which is nonsense
39	anonymous	No
40	anonymous	No signage
41	anonymous	I thought this was already a rule to be fair
42	anonymous	n
43	anonymous	n

ID	Name	Responses
44	anonymous	n
45	anonymous	n
46	anonymous	n
47	anonymous	n
48	anonymous	High standards should be maintained.
49	anonymous	As stated before, card machines work when and if they want to, the driver being penalised for something they cannot control is utterly ridiculous. That's exactly why so many drivers have quit the job in recent years, taxi licensing's points sytem is a complete joke.
50	anonymous	Again are the council willing to compensate for transaction fees. Perhaps the council should employ all drivers on PAYE!!
51	anonymous	NO
52	anonymous	I think all private hire taxis should display what company they work for. For public safety.
53	anonymous	We all have card machines but not working some times and is not our fault
54	anonymous	If suddenly the card reader crashed and stop working please could you tell me why you should give penalty points to the driver? What's his fault?
55	anonymous	Who pays for card reader fee? Who pays if card reader doesn't work? No!NO! Working card machine should not be compulsory!
56	anonymous	No
57	anonymous	Every vehicle should have appropriate signage, if working for a company, it helps customers identify the cab picking them up.
58	anonymous	Points for failing to provide a working card machine - yes Points for failing to provide signage or inappropriate signs - no (this matter should be dealt with as it is currently)
59	anonymous	No
60	anonymous	We all should be displaying properly
61	anonymous	Too many not showing the office number which is a safeguarding issue
62	anonymous	It is not going to help anyone, especially card payments, we can't get the payment if we don't have the signal, and I have already lost over a hundred pounds regarfing this signal issues, Now you trying to bring in the give a penalty point, it must be joked really.

ID	Name	Responses
63	anonymous	I agree with the signage, but not the card reader, as I can be Populatic and difficult to replace et cetera
64	anonymous	Sometimes on the card machine there isn't a signal and the machine can be faulty sometimes. It should not be a punishment if the machine stops working.
65	anonymous	Same as previous
66	anonymous	A card reader can go down at any time if you loose Internet connection my Internet connection was down a few months ago sky for about 6 hours
67	anonymous	Same as previous part .
68	anonymous	Same as previous
69	anonymous	As a taxi driver we are always change locations when we try to proceed a card payment. Sometimes due the poor signal, mobile network issues , card payment providers going down or many others not very logical reasons ( like the customer is ask to try another card but the card is working in a cash machine). Because of that I consider that I consider that it will be very unfair for me to receive points because I couldn't proceed a transaction. If a complaint is made the history shows even if is very hard to determine what really happened the Taxi Licensing and the committee tends to punish the drivers .
70	anonymous	Agree, hopefully large flags, romanian and other draped across back windows will be considered inappropriate too.
71	anonymous	Same as previous
72	anonymous	WHAT A LOAD OF RUBBISH TO COME UP WITH
73	anonymous	Signage attach to windows obscure the view not needed
74	anonymous	No
75	anonymous	Just get cars on the road
76	anonymous	I don't see the requirement for a points system at all. The Driver receiving points has no way to Appeal against the issue of points. If a Driver has allegedly Offended, the Taxi Committee, not Licensing Officers should decide on penalties.
77	anonymous	Most card machines do not work in Plymouth
78	anonymous	No
79	anonymous	Don't get it, as long as they are licenced and insured and have a none sexual or violence clear dbs then that should be fine
80	anonymous	Equal to everyone

<b>ID</b>	<b>Name</b>	<b>Responses</b>
81	anonymous	Some time people do forget things
82	anonymous	The stickers signs provided are not suitable for all vehicles or positioning in and are not readable at night. waste of money.
83	anonymous	Are you looking for more money to budget? Sent you employed people to work! you make more money!
84	anonymous	Again lack of enforcement , drivers will carry on refusing card payments until such time enforcement starts to actually penalise these unprofessional drivers
85	anonymous	No
86	anonymous	Pathetic
87	anonymous	No
88	anonymous	Only if the action was made with a bad intention
89	anonymous	Playing God
90	anonymous	As above
91	anonymous	Same as previous
92	anonymous	how many points and what is considered unsuitable or inappropriate. I agree that if something is racist, sexist, homophobic etc but if a driver or owner wants to advertise an event or another service that they can provide what is the problem, why can't it be left to common sense.
93	anonymous	This is going too far and I am starting to feel like an employee rather than self employed.
94	anonymous	Silly idea and we just need more cars on the road.

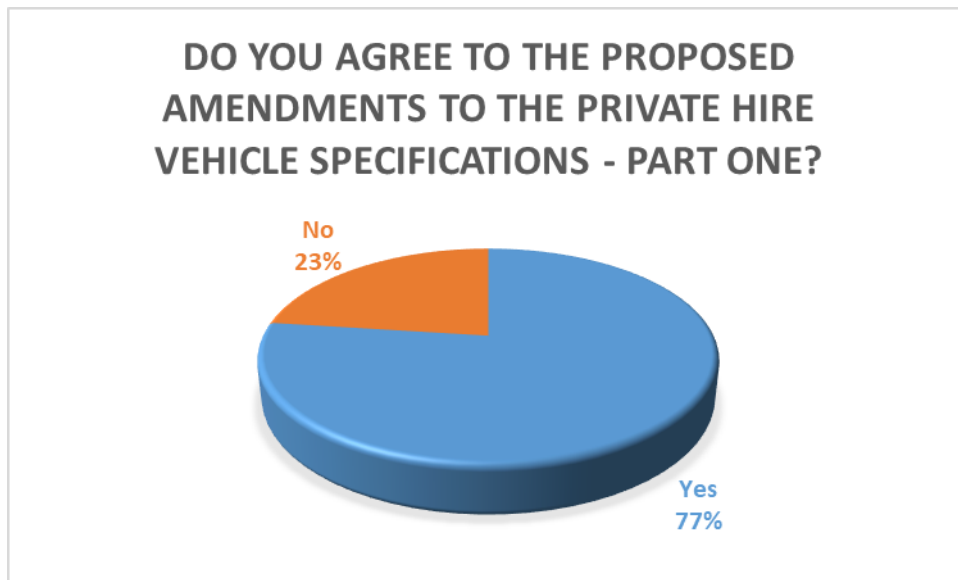
## Appendix J

### Comments received in the online survey

#### Private Hire Vehicle Specifications - Part One

Do you agree to the proposed amendments to the Private Hire Vehicle Specifications - Part One?

369 responses were received to the question 284 (77%) were in agreement with 85 (23%) not in agreement with the proposals.



68 comments were received and are shown below:

Plymouth Licensed Taxi Association response:

In the interests of passenger safety there must be doors on both sides of the vehicle to afford egress in the event of an accident. This is particularly important in the event of a “rear end shunt”.

It appears that PH operators do not wish to have WAV's in their fleets as such vehicles appear to have been off loaded to specialist PH companies who charge higher fares to all passengers to get around the Equality Act 2010 S164A (5)(f).

ID	Name	Responses
1	anonymous	I help many disabled customers and always explain the vehicles to them. The customer normally has a few options themselves and the most important thing for them is just to help as best as we can or they end up with no taxi at all.
2	anonymous	No
3	anonymous	Whilst I agree with the change in the rules I genuinely don't believe that it will encourage drivers to go out and purchase a WAV. These vehicles are expensive to buy, they have to have extra testing for the rear loading mechanism and the market for this vehicle with customer trade is marginal.

ID	Name	Responses
		Additionally the time taken to load/unload a wheelchair bound customer eat into the working day and whilst I acknowledge that to charge someone for this would be discriminatory I do believe that this is a primary reason why many drivers do not consider this type of vehicle for their Taxi
4	anonymous	If it means that all passengers are catered for who am I to argue.
5	anonymous	No
6	anonymous	is not that easy to find a W.A.V. with two side doors .
7	anonymous	I'm Hackney so doesn't affect me and I wouldn't ever buy a wheel chair private hire
8	anonymous	It is much safer for ALL passengers to embark/disembark on the pavement side of ant vehicle.
9	anonymous	N
10	anonymous	N
11	anonymous	When it comes to vehicle investment, I don't think that the council fully appreciates how much "income" a vehicle can raise in a working week. Purchase of a vehicle, running costs and the driver's income has to be paid from that weekly turnover which can only be greater than £1,000 per week if the driver works dangerously long hours.
12	anonymous	No
13	anonymous	No
14	anonymous	2-door ramp cars are designed to allow people with disabilities to get in and out of the vehicle easily. The ramp facilitates loading and unloading in a more accessible way. In many countries, there are regulations and laws that require taxi operators and transport companies to have accessible vehicles for people with disabilities.
15	anonymous	Hackney carriage drivers should all be made to carry wheelchairs and the only exception is failing a medical, a doctors note does not cut it for me
16	anonymous	Easy access to the car and easy closing of the ramp contribute to the comfort of people with disabilities. They don't have to exert much effort to get in or out of the vehicle. These cars give disabled people more independence and autonomy because they can get in and out of the vehicle without the help of others.
17	anonymous	no
18	anonymous	Again, a very sensible proposal based on available vehicles on the market
19	anonymous	None

ID	Name	Responses
20	anonymous	No
21	anonymous	No
22	anonymous	No.
23	anonymous	Currently and private hire or managed I don't see why there would be a change
24	anonymous	No
25	anonymous	More private hire operators fail to serv the disabled
26	anonymous	n
27	anonymous	n
28	anonymous	n
29	anonymous	n
30	anonymous	n
31	anonymous	n
32	anonymous	No comment.
33	anonymous	NO
34	anonymous	I strongly agree with this proposal. As stated, this will allow upgrading existing vehicles and acquiring newer wheelchair accessible vehicles much easier and more cost effective.
35	anonymous	After reading all your proposed it's look like you work against us, trying to force us to spend more money, to fulfil your idea, increasing the risk to take away our licence and make complicate our business. I am very disappointed 😞
36	anonymous	As a disabled person I find it really difficult to get a suitable vehicle. I do not agree with Hackney carriages having wheelchairs. It is not safe and they can not be secured properly
37	anonymous	No
38	anonymous	No
39	anonymous	Not enough disabled friendly taxis in Plymouth
40	anonymous	Too many private hire vehicles being licensed with small boots
41	anonymous	Too many private hire cars are too small and not fit for purpose. Yes most a more efficient for the economy but unable to fit passengers luggage or wheelchairs in or prams meaning passengers with babies are being made to

ID	Name	Responses
		stand in the rain for too long. This wouldn't be a problem if there was more hackney carriages but people are leaving the trade due to all the new rules.
42	anonymous	No
43	anonymous	No
44	anonymous	No comment
45	anonymous	No comments
46	anonymous	Seems sensible enough.
47	anonymous	No
48	anonymous	KEEP IT THE SAME
49	anonymous	Must be doors both sides for safety
50	anonymous	No
51	anonymous	Cars on road please
52	anonymous	As the WAV Hackney will continue to decline in numbers, the cost of the vehicles being too prohibitive, something must be done for the wheelchair using public. Unfortunately, as PHV set any Tariff they like, I foresee Taxi or PH provision disappearing completely except for VERY expensive specialists, who, as they "would" charge the same for the ambulant, can charge whatever they like.
53	anonymous	If we can help the disabled then great depending on money
54	anonymous	No
55	anonymous	Anything to help the disabled get around
56	anonymous	Again personal preference
57	anonymous	here you are again pushing the disabled into the most expensive form of transport with no competition. You should be licensing hackney carriages with those types of vehicles creating competition between the trades not restricting the disabled to expensive transport.
58	anonymous	Disable people should have priority
59	anonymous	No
60	anonymous	If that helps disabled to move around better when needed why not.
61	anonymous	No



ID	Name	Responses
62	anonymous	It will rise to much the cost for purchasing new vehicles and also maybe it will affect the cost of the services provided
63	anonymous	Asking private hire drivers to purchase new wheelchair friendly vehicles at massive cost Some drivers can't even afford to pay their normal bills at moment in a cost of living crisis get a grip Plymouth city Council and taxi licencing
64	anonymous	Am not wheelchair accessible so have no opinion but I carry disabled and fold wheelchairs for the boot
65	anonymous	No
66	anonymous	This is totally biased if allowed , the council has imposed on the Hackney Carriage trade the financial burden of having to buy WAV's when a large proportion of drivers have medical exemptions or are elderly and can only manage to accommodate some wheel chairs. we have asked for rear loading vehicles etc and have been declined on safety grounds yet private hire companies that can buy cheaper vehicles but charge inflated prices to disabled customers are now asking that safety standards be relaxed so that profits can be increased. this is not in the spirt of the disability discrimination act.
67	anonymous	Some cars are too small for 6 or 4 persons

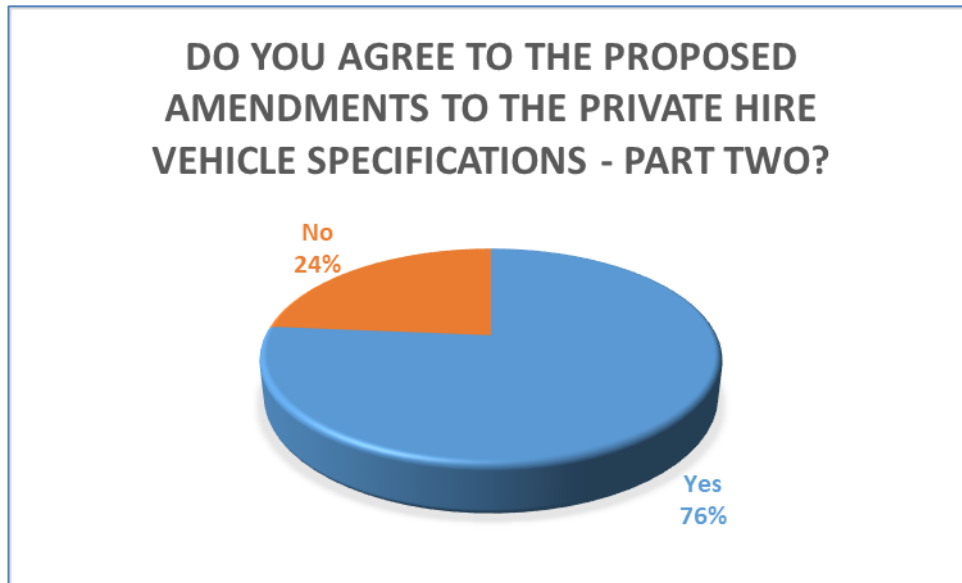
**Appendix K**

**Comments received in the online survey**

Private Hire Vehicle Specifications - Part Two

Do you agree to the proposed amendments to the Private Hire Vehicle Specifications - Part Two?

372 responses were received to the question 284 (76%) were in agreement with 88 (24%) not in agreement with the proposals.



74 comments were received and are shown below:

Plymouth Licensed Taxi Association response:

PHV's may have passenger seats for 1 – 8 passengers. There should be a minimum seat width of 38cm's (15 inches) per passenger and 144.4cm's (45 inches) per rear seat as there used to be to permit three rear seat passengers to sit in reasonable comfort.

Saloon PHV's with less than 144.4cm's (45 inches) Rear Seat should be licensed for three passengers.

ID	Name	Responses
1	anonymous	Some 5 seaters (4 customers) can't fit a 5th person in the center correctly
2	anonymous	No
3	anonymous	Some people are to big so its impossible to carry them in confort for them.
4	anonymous	Comfort is subjective
5	anonymous	Some of the vehicles that we have licensed within Plymouth as private hire vehicles today are ridiculous, there are vehicles that struggle to carry

ID	Name	Responses
		two passengers in the back with a level of comfort but yet they're being allowed to be used as private hire. I agree that we should have Rule that states that a private hire vehicle must be able to carry four people in a vehicle plus the driver
6	anonymous	All private hire cars should be comfortable for 4 passengers to be carried in, a lot are uncomfortable for carrying 4 passengers safely as some are not big enough.
7	anonymous	No
8	anonymous	Private hire minimum of 4 and Max of 8 if there's a seat and a belt then in my opinion everything is safe
9	anonymous	N
10	anonymous	No
11	anonymous	No
12	anonymous	4-seater cars are ideal for urban and short daily trips where a larger vehicle is not needed. 4 seater cars can provide an adequate level of passenger comfort without being overcrowded.
13	anonymous	Yes seen far to many cars plated as private hire when obviously not fit for purpose. But blame lies with pcc for allowing them to be plated
14	anonymous	A standard vehicle needs to be able to carry 4 passengers in comfort, I can remember when smaller vehicles eg a Ford Orion was used a it was licensed to carry 3 passengers, what happened to that condition??
15	anonymous	If you frequently travel in small groups, it is more economical to use a car that can carry 4 people than to rent or use a larger vehicle. 4 seater cars can provide an adequate level of passenger comfort without being overcrowded.
16	anonymous	The taxi specifications should be clear
17	anonymous	None
18	anonymous	It is impossible to define: "Vehicles must be able to carry 4 adults in comfort." Who will decide if the car is big enough to carry 4 passengers in comfort? If you have four tall people, most taxis will not be able to meet this requirement. Leave it the way it is.
19	anonymous	I think this is a grey area as if you are required to pick up 4 passengers who are over 6ft tall and 20 stone then they could argue they are not travelling in comfort. Years ago there was a minimum width for the rear seats. Surely this is an easier option for the council and drivers rather than the aforementioned proposal.

ID	Name	Responses
20	anonymous	No
21	anonymous	No, It's common sense.
22	anonymous	Is normal
23	anonymous	No
24	anonymous	I strongly agree with this. My customers are always commenting how some PHV drivers insist on nobody sitting in the front. Some passengers require the front seat for ease of access
25	anonymous	n
26	anonymous	n
27	anonymous	n
28	anonymous	n
29	anonymous	n
30	anonymous	In comfort is difficult because people vary dramatically in size
31	anonymous	No comment
32	anonymous	What does "in comfort" mean?? Some customers are never pleased and this would leave drivers at risk of being penalised for a very subjective matter.
33	anonymous	Size of the passengers would decide how comfortable the journey is. Are the council requiring passengers to declare their weight when booking the ride?
34	anonymous	There is a requirement for each seat being 16 inches per passenger, but I have seen smaller taxis which cannot possibly fit this remit.
35	anonymous	No
36	anonymous	The average number of customers for private hire is 1-2, only 10% of journeys are with 3 passengers and less than 2% with 4 passengers.
37	anonymous	No
38	anonymous	That's going to take a lot of cars of the road as not many can transport 4 in comfort
39	anonymous	No

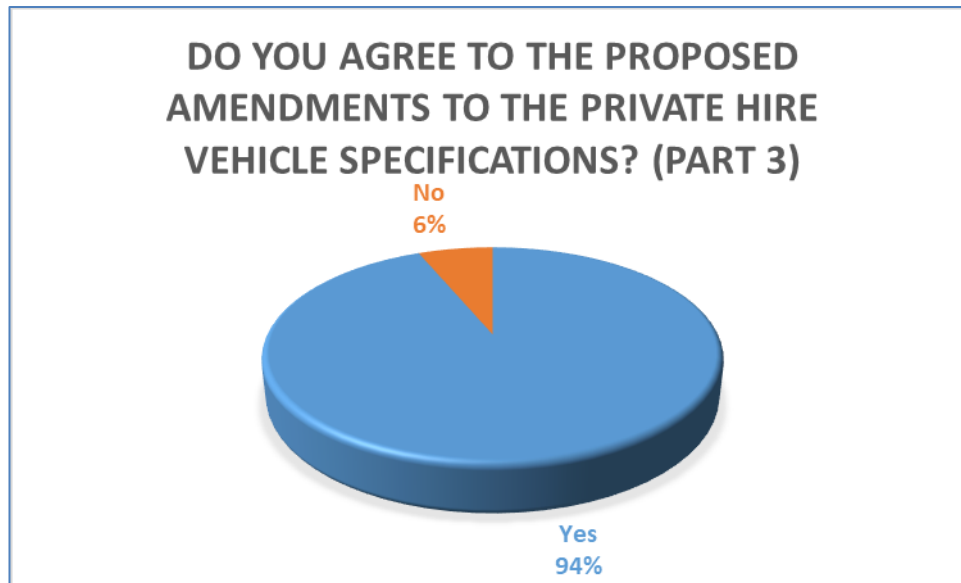
ID	Name	Responses
40	anonymous	Private hire seem to ignore disability customers needing wheelchairs too many cars with small boots which not possible to fold up a wheelchair or pram etc
41	anonymous	Too many private hire cars are too small and not fit for purpose. Yes most a more efficient for the economy but unable to fit passengers luggage or wheelchairs in or prams meaning passengers with babies are being made to stand in the rain for too long. This wouldn't be a problem if there was more hackney carriages but people are leaving the trade due to all the new rules.
42	anonymous	No
43	anonymous	No
44	anonymous	Yes vehicle design nowadays for the rear seat are different now than they where years ago
45	anonymous	No
46	anonymous	No comments
47	anonymous	Show me a good car for 4 rugby players
48	anonymous	Depending on the size of the passenger/ s . Eg 4 adults @ 6ft4 & heavily built will struggle to get into most 4 door vehicles , with little to no leg room , therefore not very comfortable.
49	anonymous	Agree, or some clever clogs will try to license a 2 seater beach buggy etc.
50	anonymous	No
51	anonymous	4 ADULTS SHOULD BE SAT COMFORTABLY IN ANY VEHICLE
52	anonymous	No
53	anonymous	Cars on road
54	anonymous	The "4 Adults in comfort" must not include a wheelchair passenger, such provision should be additional.
55	anonymous	I have sat in some very small cars like the Prius with 3 adults on the back seat and it feels very unsafe in the centre
56	anonymous	No
57	anonymous	Cars are very small but with ev's they are going to get smaller
58	anonymous	All depends on the size of the adults

ID	Name	Responses
59	anonymous	The vehicles with seats in third row not always in boot space as this depends on vehicle are already being licensed in plymouth thus showing licensing dont know what there doing again.
60	anonymous	4 persons is good reason to serve!
61	anonymous	The council have licensed vehicles that are slightly on the small size ,testing garages need more clarification on vehicle sizes
62	anonymous	No
63	anonymous	No
64	anonymous	Customers come in all shapes and sizes. And P/H vehicles similar . You will please some people but not others
65	anonymous	No
66	anonymous	Must be not more than 4 passengers
67	anonymous	there are already vehicle sizes specified. And you can't register vehicle which is vary small and uncomfortable. Plymouth is very narrow city, and to do this job efficient you can't have very big car as monovering will take a lot of struggle, time and be sometimes unsafe either. Vehicles like Toyota Prius or Toyota Auris are not small and uncomfortable for majority of 4 passengers. But If 4 passengers are bigger than average they will struggle with any normal 4 passengers car, they just need to hire 2 cars if they want comfortable journey, or book 5, 6, 7 seater car. Big majority of jobs are for 1 or 2 passengers only anyway.
68	anonymous	There are those who would say that the Toyota is to small for four passengers and has insufficient boot space but that would take half the private hire off the road.comfort is different for different people
69	anonymous	This will create more arguments. "In comfort" is something vague, really depending how big the passengers are.
70	anonymous	No
71	anonymous	what is an acceptable measurement for an adults seat in a private hire vehicle! I think that if a car is used for private hire use that it should be subject to the same seat width specifications as a public hire vehicle.
72	anonymous	State what "comfort" is. If you have 3 large person they will not be in "confort" in any type of vehicle, not even in a hackney. If you want introduce it then give minimum measurements. And what about the ones that have the vehicles in instalments and doesn't fit your criteria
73	anonymous	Some cars are to small for 6 or 4 persons and I would say dangerous

**Appendix L****Comments received in the online survey**

## Private Hire Vehicle Specifications - Part Three

Do you agree to the proposed amendments to the Private Hire Vehicle Specifications? (Part 3)



372 responses were received to the question 296 (80%) were in agreement with 76 (20%) not in agreement with the proposals.

71 comments were received and are shown below:

Plymouth Licensed Taxi Association response:

This is not a good idea. With four adults in a PHV there remains a requirement for vehicles to have engines powerful enough to maintain a reasonable speed on the hilly terrain of Plymouth and the surrounding area. The 1290cc specification should be retained.

ID	Name	Responses
1	anonymous	Some 1.0 engines are not for me but very good engines for around town.
2	anonymous	Unbelievable that this proposal has taken so long
3	anonymous	No
4	anonymous	The market for available vehicles that are suitable for private hire and forward within the rules has shrunk massively since the introduction of Euro six specification, some cars these days are now 1 Litre and supported by hybrid technology still managed to produce the power and economy that larger engines will provide Therefore I believe that we should be looking to change the rules that enable us to have vehicles of this engine size and upwards to be used as private vehicles but, in conjunction with the rule that it should be able to comfortably carry four people plus driver

ID	Name	Responses
5	anonymous	As long as the car is comfortable and is able to carry up to 4 passengers safely, then who can argue.
6	anonymous	No
7	anonymous	Long as the car drives safe enough and the power is there then shouldn't matter the size of the engine
8	anonymous	N
9	anonymous	N
10	anonymous	There are way too many old vehicles , some of them even from 2006 , all vehicles from 2014 and below shouldn't be used in the taxi trade. A vehicle to be licensed should be from 2017 at least or Euro 6. It would look much nicer to see all the licenced ars being newer , 2015 onwards, just an opinion.
11	anonymous	Brilliant, if you can afford a 1 litre turbo that has the same power as a 2 litre turbo ideal. Just don't put a cap on maximum engine size
12	anonymous	No
13	anonymous	No
14	anonymous	Yes definitely you can buy a Skoda octiva hybrid 1.0 litre which will be another good option which is used through the country as a private hire vehicle perfect size and enough power
15	anonymous	Too many old cars. A car cannot be licenced if it's not from 2017 or Euro 6, but there's still cars from 2005/2006.
16	anonymous	Cars with small engines usually emit less carbon dioxide, which can help reduce the environmental impact in polluted cities. Small engines are suitable for urban traffic and short city trips. They can provide better handling and save time and fuel in traffic jams. If operating costs, including fuel and maintenance, are lower, taxi drivers can earn a better income in the end.
17	anonymous	No
18	anonymous	Cars with small engines usually emit less carbon dioxide, which can help reduce the environmental impact in polluted cities. Small engines are suitable for urban traffic and short city trips. They can provide better handling and save time and fuel in traffic jams.
19	anonymous	no
20	anonymous	Vehicle engine capacity is obsolete as a factor now as noted and will likely continue to change with the advancement of new technology
21	anonymous	None



ID	Name	Responses
22	anonymous	Absolutely! It should be entirely up to the driver what car she or he wants to drive.
23	anonymous	No
24	anonymous	No.
25	anonymous	Plymouth is built in the hilly area and the small engines with 5 occupants in the car do not think cope properly
26	anonymous	No
27	anonymous	n
28	anonymous	n
29	anonymous	n
30	anonymous	n
31	anonymous	n
32	anonymous	n
33	anonymous	No comment.
34	anonymous	NO
35	anonymous	No
36	anonymous	Common sense ! Well done Plymouth City Council . These changes can only be good for the people of Plymouth .We need more taxi drivers in this City .These proposals are common sense and will benefit the whole community and will provide the public with a great Service .
37	anonymous	No
38	anonymous	This should only be applicable to those vehicles that have a hybrid power train, to ensure there are not private hire vehicles that don't have enough power to comfortably get up some of the steeper hills within Plymouth
39	anonymous	Ok for around town but not for anything out of the city
40	anonymous	No
41	anonymous	Small engine capacities in cars is NOT environmentally friendly if moving 3 or 4 people up hills. I own and drive a car with a smaller engine. Whoever said they are morons or liars!
42	anonymous	Too many private hire cars are too small and not fit for purpose. Yes most a more efficient for the economy but unable to fit passengers luggage or

ID	Name	Responses
		wheelchairs in or prams meaning passengers with babies are being made to stand in the rain for too long. This wouldn't be a problem if there was more hackney carriages but people are leaving the trade due to all the new rules.
43	anonymous	No
44	anonymous	Would be a good idea to postpone EV cars until 2035. Has we will have a better infrastructure hopefully by then
45	anonymous	Why is the requirement being based on engine cubic capacity? It should be on power output a 1.0 Eco boost Ford Focus produces 125 PS some cars over the 1290cc don't produce more than 125PS
46	anonymous	With regards to the Hackney cars you need to bring back the euro 5 because the euro 4 is old and is very expensive to run. Euro 5s are easy to get hold of but euro 6s are almost impossible to find, due to the financial situation in the UK., plus there is a shortage of the euro 6s.
47	anonymous	I think it should be 1.6 lowest engine
48	anonymous	Anything less you will struggle to get up roads like Ford Hill fully loaded
49	anonymous	Should be 1.6 engines .
50	anonymous	No comment
51	anonymous	No.
52	anonymous	I think it should be 1.6 lowest
53	anonymous	No
54	anonymous	I just want a taxi
55	anonymous	All electric would be Zero CC, so any number for CC is ridiculous. A BHP minimum makes more sense.
56	anonymous	You need a powerful engine to drive as a professional
57	anonymous	No
58	anonymous	powerful cars are faster getting around
59	anonymous	Economy friendly
60	anonymous	why you are so interested in trying to restrict the drivers of both trades i dont know as you cant control vehicles from other councils working in plymouth there needs to be one set of standards for the country as a Hackney cab can work anywhere in the country. plymouth licensing and councilors need to speak to drivers and learn about the trade and i dont mean in mass but more individual. contact. steven smale. <a href="mailto:smaler@hotmail.co.uk">smaler@hotmail.co.uk</a>

ID	Name	Responses
61	anonymous	Well. New cars gave small engine, because pollution, so stop tell us what is good. We know, you are just lost!
62	anonymous	Please explain why taxi licensing has knowingly licensed a vehicle very recently licence number PHVL0917 with 1199cc this is already less than the proposed changes of cylinder capacity? So in theory we should be allowed to plate a Hackney carriage without having to stick to the livery policy, surely it cannot be one rule for one and one for another
63	anonymous	No
64	anonymous	No
65	anonymous	No
66	anonymous	Again a cost of a new vehicle while 80% of the population are struggling get a grip Plymouth city Council and taxi licensing a taxi vehicle should be no more than 6 yrs old for both fleets
67	anonymous	I think it should be 1.5 at least
68	anonymous	vehicles with smaller engines that might be more environmentally will have work a lot harder than when used as a private vehicle and in doing so will be at the top end of their power curve and as a result burn more fuel which will make it less environmentally friendly.
69	anonymous	Finally one good question
70	anonymous	Small engines are poor and struggle

## Appendix M

Vauxhall Grandland X SUV (2018 – 2021)

Tech Line Nav 1.2 (130PS) Turbo S/S 5d



<b>Power (bhp)</b>	128 bhp
<b>Acceleration 0-60 mph</b>	9.2 secs
<b>Miles per tank</b>	464 miles
<b>Insurance group</b>	12
<b>Road tax</b>	£180 per year
<b>Dimensions (mm)</b>	Length <b>4477mm</b> X Width <b>2098mm</b>