

# SHEFFIELD CITY COUNCIL

## Licensing Committee

### Meeting held 29 September 2016

**PRESENT:** Councillors David Barker (Chair), Alan Law, Andy Bainbridge, Jack Clarkson, Neale Gibson, Adam Hurst, George Lindars-Hammond, Anne Murphy, Andy Nash and Cliff Woodcraft

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#### **1. APOLOGIES FOR ABSENCE**

1.1 Apologies for absence were received from Councillors Moya O'Rourke, Josie Paszek, Vickie Priestley and Bob Pullin.

#### **2. EXCLUSION OF PUBLIC AND PRESS**

2.1 No items were identified where resolutions may be moved to exclude the public and press.

#### **3. DECLARATIONS OF INTEREST**

3.1 There were no declarations of interest.

#### **4. MINUTES OF PREVIOUS MEETINGS**

4.1 The minutes of meetings of the Sub-Committee held on 19<sup>th</sup>, 21<sup>st</sup>, 25<sup>th</sup>, 26<sup>th</sup> and 28<sup>th</sup> July, 2<sup>nd</sup>, 9<sup>th</sup>, 16<sup>th</sup>, 18<sup>th</sup>, 23<sup>rd</sup>, 25<sup>th</sup> and 30<sup>th</sup> August, and 1<sup>st</sup> and 6<sup>th</sup> September 2016, were approved as correct records.

#### **5. PRIVATE HIRE OPERATOR AND VEHICLE POLICY**

5.1 The Chief Licensing Officer submitted a report on the Private Hire Operator and Vehicle Policy. The report indicated that the Licensing Service was streamlining the current policies in relation to the licensed Hackney Carriage and Private Hire trade, and this was one of the three policies being created, with the others being the Hackney Carriage and Private Hire Drivers Policy and Hackney Carriage Vehicle Policy.

5.2 The report also set out information in terms of what the Policy would mean to the people of Sheffield, what the Policy would deal with, and what it delivered, together with details of the consultation undertaken. The report attached, as appendices, details of responses received as part of the formal consultation exercise, equality impact assessment notes and a copy of the draft Private Hire Operator and Vehicle Policy.

- 5.3 The report was introduced by Steve Lonnia (Chief Licensing Officer) and also in attendance was Craig Harper (Licensing Strategy and Policy Officer).

The following people made representations in connection with the draft Policy:-

5.4 Fred Jones (General Manager, UK and Ireland Expansion, Uber)

- 5.4.1 Mr Jones, accompanied by Alan Clark (UK Policy) and Mustafa Khanbhai (General Manager, Sheffield), expressed initial concerns at the fact that Uber had only become aware of the report on 5<sup>th</sup> September 2016, and were extremely concerned at the number of changes the Licensing Service was seeking to introduce in the new Policy. He considered that the Policy imposed a number of wholly new and very material conditions, which were likely to have a very significant adverse impact on private hire vehicle operators and drivers, as well as the overall competitiveness of the market in Sheffield, which would ultimately be damaging to consumers. He referred specifically to four conditions, which had not been included in the original consultation, but had been added subsequently and, as such, he believed they had not been properly consulted upon and that their impact appeared not to have been properly assessed by the Licensing Service. Uber's objections to the proposed conditions were as follows:-

- (a) Part 6 – Condition 2(d) – The operator premises must be staffed at all times that the operator is open for business

Mr Jones considered this condition unreasonable on the grounds that the Uber office was not open to the public, there was minimal need for drivers to attend the office, and that this would materially increase the Company's costs in maintaining its private hire operation in Sheffield. He stated that there was no evidence that any of the aims of the condition, specifically regarding public safety, would be met, and he considered that a requirement for all operators to staff their offices 24 hours a day, every day, was entirely disproportionate.

- (b) Part 6 – Condition 6(d) – The operator must ensure that customers can speak to a real person in the event of a complaint or problem with the journey. Therefore, all operators must have a telephone line, based in Sheffield, that is advertised to the public and is accessible at all times.

Mr Jones stated that this requirement, if introduced, would impose a considerable financial burden on app-based operators, like Uber, without any, or any material, benefit for customer care or safety. He stated that Uber already had a dedicated service team, available at all times, which provided

timely responses to customer queries and complaints via in-app support, e-mail and outbound calls, and that there was no evidence to suggest that such a service would compromise public safety. As part of Uber's service, riders and drivers were able to contact each other by telephone via the app, with neither party's telephone numbers being revealed to the other for privacy reasons. In addition, Mr Jones considered that such a condition would constitute a considerable barrier to entry for new operators, thereby potentially reducing the supply of private hire vehicles, and having a distorting effect on competition.

- (c) Part 7 – Condition 7(h) – The operator must have the ability to take a booking up to seven days prior to the commencement of the journey.

Mr Jones stated that, again, he considered that this proposal would have no material impact on customer safety, and would be likely to reduce competition and consumer choice, leading to direct consumer harm. Uber relied on its technology to keep partner drivers busier, reduce costs and increase partner driver revenue, and that long-term pre-bookings would fundamentally compromise its ability to do this by radically lowering the utilisation of private hire vehicles.

- (d) Part 14 – Change of Operator - (a) Any Sheffield licensed vehicle may only be registered to work with one licensed operator at any one time, except when the vehicle is also operated personally by the proprietor/driver, and (b) The proprietor or such driver of the vehicle must notify the Council immediately, or in any event within five working days, of any change of operator to which the vehicle is to be operated.

Mr Jones stated that this, along with the other proposed conditions above, would have a significant detrimental impact on the ability of operators, including Uber, to compete, and for private hire vehicle drivers to establish and maintain their businesses in Sheffield.

5.4.2 Mr Jones also referred to a letter sent by the Competition and Markets Authority (CMA) to the Licensing Service, commenting on the draft Policy. He referred specifically to the CMA's comments on the four additional conditions now referred to, which it considered could risk undermining competition, create barriers to entry and innovation, and thus harm the interests of passengers.

5.4.3 Steve Lonnia responded by stating that the Licensing Service had consulted on the draft Policy in the same manner which it always undertook consultation, in that all relevant groups and individuals had been notified of the draft Policy over a 10 to 12 week period, as

recommended by the Government. He made the point that there was no legal requirement on the Service to consult, but accepted that it was best practice to do so. Mr Lonnia indicated that the four policy changes, as now mentioned, had been included in the draft Policy following consultation and represented changes that the Service considered necessary and positive, particularly in terms of improving public safety. The Licensing Service had looked at the potential impact of all the four policy changes, and considered that they were all relevant, particularly in terms of improving public safety. Mr Lonnia added that, although it was not the responsibility of the Council, he considered that the four changes would not purposely stifle competition in terms of private hire vehicle operators in the City.

- 5.4.4 In response to questions from Members of, and the Solicitor to, the Committee, it was stated that, in terms of investing in the City, Uber created employment opportunities for drivers and increased choice for passengers, and the Company had plans to talk to local authorities in terms of the use of electric and low emission vehicles. The Company paid all due taxes on profits in the UK, and the Company was now operating in 20 towns and cities across the UK. The drivers were paid by direct bank transfer, and would receive payment statements. Whilst it was appreciated that not everyone would choose to use Uber, feedback from those customers who had used the Company had been very positive. In terms of how the system worked, customers would use the app on their smartphones, and would be able to track the vehicle's arrival. In terms of customer services, in the light of a serious incident, the public could contact Uber's Incident Response Team, 24 hours a day, seven days a week, through the app.
- 5.4.5 Steve Lonnia stated that, as part of the consultation process, the Licensing Service sent out details of the draft Policy to relevant trade parties and groups, as well as putting the report on the Council's website. He stated that, on 1<sup>st</sup> April 2016, at the request of Members, the sections in the draft Policy relating to vehicle age limits and vehicle signage had been temporarily withdrawn from the consultation process and subsequently, meetings were arranged with relevant trade parties and groups, which included GMB, Sheffield Taxi Trades Association (STTA), ALPHA and City Taxis, in order to try and agree an amicable way forward.
- 5.4.6 Mr Jones made the point that Uber had not been consulted as part of this second stage. In terms of the Company's driver operation, Mr Jones stated that its drivers could pick up customers anywhere in the country, as long as the booking was made in the area where the driver was registered. He added that the Company held detailed electronic records of all its drivers, together with insurance and other relevant details. In terms of contact with the Company, communication would generally take place via the app, but any serious incidents would be dealt with by the Company's call centre.

- 5.4.7 Steve Lonnia stated that he believed that a facility for the public to speak to someone was necessary in terms of public safety, particularly in those cases where friends or relatives of the customer either did not have a smartphone, or where those who did, were either not able to download the app or did not understand how to use it.
- 5.4.8 Mr Jones stated that, as part of Uber's service, users had the facility to send friends or relatives a text, which would able them to track the vehicle's journey. Mr Jones stressed that customer safety was very important to Uber, and that it was obviously in the Company's interest, to ensure that this was the case. The Company believed that there were other, better ways for customers to communicate with the Company other than a landline. The Company had a dedicated law enforcement response team, which would deal with any matters of a serious nature, and if there were any serious matters of a safeguarding nature, the Company's technology allowed for every single journey to be tracked. In the case of valuables left in its vehicles by customers, the driver would make a note on the app, which would enable the customer to meet the driver or for a call to be directed through to the Company's call centre, who would then contact the customer. The Company's Instant Response Team was based in Limerick, Republic of Ireland, and comprised around 100 staff. In terms of customer complaints received relating to the lack of a landline, and customers or anyone else trying to contact Uber, Mr Jones stated that whilst he did not have any details, any complaints of this nature would have been acted on and reviewed immediately.
- 5.4.9 Craig Harper stated that, whilst he did not have any details, his recollection was that the Licensing Service had not received any such complaints.

5.5 Kevin Flint (General Manager, City Taxis)

- 5.5.1 Kevin Flint stated that he would like to support the four additional licensing conditions now referred to on the grounds that City Taxis considered that they would enhance the customer experience and promote public safety, as follows:-

- (a) Part 6 – Condition 2(d) – The operator premises must be staffed at all times that the operator is open for business

Mr Flint stated that over many years, City Taxis offices had proved to be a vital focus point for its drivers and customers, with its drivers having been forced to visit the offices on those occasions when they have felt afraid or vulnerable, due to incidents that had occurred. City Taxis also provided prayer facilities at its offices for its drivers to use, and drivers would also attend the offices should they encounter any issues

surrounding their equipment. Customers had also visited the offices to retrieve lost property, make complaints, or simply pay for journeys in advance.

- (b) Part 6 – Condition 6(d) – The operator must ensure that customers can speak to a real person in the event of a complaint or problem with the journey. Therefore, all operators must have a telephone line, based in Sheffield, that is advertised to the public and is accessible at all times.

Mr Flint stated that City Taxis believed that the requirement for operators to provide a manned telephone line, to deal promptly with customer complaints, lost property, police enquiries and other urgent enquiries about children or vulnerable adults who may be missing, should be mandatory. The Company received a large number of such enquiries, on a regular basis, including many calls out of normal business hours, and believed that a responsible taxi operator should be compelled to provide such a facility 24 hours a day, seven days a week, 365 days a year. Mr Flint made specific reference to a letter of thanks the Company had received from the police, for their assistance in terms of providing information on taxi journeys, which had ultimately led to the sentencing of a number of people for murder or manslaughter.

- (c) Part 7 – Condition 7(h) – The operator must have the ability to take a booking up to seven days prior to the commencement of the journey.

Mr Flint stated that City Taxis believed that an integral part of good customer service and good business practice was to allow the facility for a customer to place an advanced booking with an operator, up to seven days in advance. The facility provided peace of mind for the travelling public, as well as allowing the operator to plan for times of increased demand. It was considered that customers may feel let down if all operators adopted a policy of not accepting advanced bookings, and pointed out that the sign displayed on the Company's licensed private hire vehicles underpins this condition.

- (d) Part 14 – Change of Operator - (a) Any Sheffield licensed vehicle may only be registered to work with one licensed operator at any one time, except when the vehicle is also operated personally by the proprietor/driver, and (b) The proprietor or such driver of the vehicle must notify the Council immediately, or in any event within five working days, of any change of operator to which the vehicle is to be operated.

Mr Flint stated that City Taxis would like to endorse the

condition, making licensed private hire drivers only able to register with one licensed third party operator. The Company supported the suggestion that a driver could be registered as an operator in his/her own right, and select to work for one third party operator in addition, as this would prevent the driver simply moving around a number of platforms, undertaking work across numerous operators simultaneously. Mr Flint stated that, in real terms, if this way of working was allowed to happen, drivers would not be likely to change over signage continuously and as a result, the travelling public would be confused. This could possibly lead to customers approaching any private hire vehicle in an attempt to find their driver which, in turn, could lead to passengers potentially travelling in un-booked and therefore, uninsured cars, resulting in a detrimental effect on passenger safety and operator/driver accountability. He indicated that City Taxis also supported the condition requiring the proprietor or such driver of the vehicle notifying the Council of any change of operator to which the vehicle is to be operated, on the basis that it was believed this was fair and reasonable.

- 5.5.2 Mr Flint added that City Taxis also welcomed the proposed conditions regarding lost property on the grounds that the Company handled over 3,000 enquiries a year relating to lost property and that, as part of its existing services, the Company already recorded all lost property reported by customers and drivers. The Company also tried to ensure that any lost property was returned to the customer, as a priority, and always endeavoured to liaise with the driver and customer, to ensure that property was returned promptly. In those circumstances where the Company was unable to identify the owner of property found, it would always ensure that such property was handed over to the police within 24 hours. The Company also supported the proposed condition regarding the requirement for those operators who ceased to operate any licensed vehicle, notifying the Licensing Authority, within 72 hours, for amendment by an authorised officer, on the basis that it considered such condition to be fair and reasonable.
- 5.5.3 In response to questions from Members of, and the Solicitor to, the Committee, Mr Flint stated that the Company was happy with the level of checks made by the Licensing Service in respect of its drivers. In terms of additional checks/training, the Company required all its drivers to undertake a first aid course and undertake Passenger Assistance Training, regarding the handling of, and dealing with, customers. All drivers were also given a selection of clothing, including polo shirts, sweaters and fleeces, all with the Company logo on. Other checks implemented by the Company included the inputting of drivers' insurance details, which would trigger a prompt when their insurance was due to run out. Mr Flint indicated that he considered the current license fee structure

reasonable and proportionate. He confirmed that City Taxis supported the condition regarding Sheffield licensed vehicles only being registered to work with one licensed operator at any one time mainly for reasons of passenger safety. The Company had the technology to track a journey if the customer had made the booking online, as well as for each job booked by phone. Mr Flint confirmed that City Taxis would be happy to accept the draft Policy as it stood, and that nothing he had heard, up to this stage in the meeting, would change his mind. He stated that there had not been many occasions when customers or other members of the public had attended its offices to seek help, but whenever they had, staff would always try and help where possible. If a customer booked a journey an hour in advance, whilst the Company were not able to guarantee the booking, it would make every effort possible but, if this was not possible, for any reason, the Company would refund the customer any expenses they had incurred as a result of the failed booking. He accepted that this was not particularly a public safety issue, but more the Company providing a public service. Mr Flint stated that if a driver was working for more than one operator, as long as the vehicle had the correct Company sticker on at the time, this would not present a risk to public safety. He stated that there would be situations where a driver working for different operators would not necessarily change the stickers on the vehicle's doors.

5.6 Ibrar Hussain (GMB)

5.6.1 Mr Hussain wanted to place on record his thanks, on behalf of the GMB, to the officers in the Licensing Service for their work undertaken as part of the consultation on the Policy. He stated that the GMB supported the four additional conditions now referred to. He believed that it was important that Sheffield licensed drivers should only be allowed to work in Sheffield and that this should be the case in other towns and cities, on the grounds that the condition of drivers' vehicles from other towns and cities may not be to a sufficient standard, and there could be a risk to public safety. He also considered it important that a driver's income should go direct to the Sheffield economy. In terms of the requirement for a telephone line, he considered that this was vital in terms of the safety of customers. He also stated that he agreed with the condition requiring a Sheffield licensed vehicle to be only registered with one licensed operator at any one time on the grounds that it was more important to protect the public, as opposed to restricting trade.

5.6.2 Mr Hussain stated that the GMB also requested additional conditions/amendments to existing conditions, and further work/information, as follows:-

- (i) The operator company must inform the Licensing Service, within 72 hours when the vehicle starts on a company, and must inform the Service when a driver leaves the company

within 72 hours;

- (ii) Intended use policy – to give commitment and weight to City Council policy and manage cross-border more readily;
- (iii) Private hire operator checks are very important – Licensing officers/Enforcement Team must have immediate access, 24/7 without any notice, to undertake investigations and inspection;
- (iv) Request an urgent, detailed report of the Licensing Service on taxi enforcement resources and ability to carry out its duties on private hire operators, cross-border private hire vehicles, Hackney Carriage vehicle and driver checks for both;
- (v) Request an urgent, detailed report on private hire operator fees, without any delay, and current banding is not correct, nor fair; and
- (vi) Request for immediate benchmarking of the tinted windows policy immediately.

5.6.3 Mr Hussain went on to state that it would be useful to have in place, a clear forward plan for policies that were forthcoming, for discussion with taxi trade representatives, and that this should be reviewed annually. He stated that the priority must be public safety, which must not be compromised at any cost, and that the Council should be dedicated in making sure that it aspired towards being the best Licensing Authority in the United Kingdom.

5.6.4 In response to questions from Members of, and the Solicitor to, the Committee, it was stated that the requirement for operators to have a telephone line would prove difficult for personal operators in that they would obviously not be able to access calls when out working, and would only be able to pick any messages up when they return home. It would not really be possible for a customer to contact the driver if they had left valuables in a Hackney Carriage. A change in legislation had resulted in operators being able to sub-contract jobs to drivers outside the City, meaning this practice was not illegal.

## 5.7 Lee Ward (ALPHA)

5.7.1 Mr Ward stated that ALPHA welcomed the four additional conditions now referred to, referring specifically to the requirement for operators to have a telephone line, and indicating that people would not always be able to use their smartphones if there was not internet access. Mr Ward also made further comments in terms of suggested amendments/additions to the Policy, as follows:-

- (i) Section 4(c) of the Private Hire Operator Policy – The operator

must also inform the Council when a vehicle starts on the company, not just inform the Council when a vehicle leaves the company. This should also have a 72 hour window for completion. There should also be a requirement that all vehicles should be registered with the Council within 10 working days of the commencement of the Policy, so that they can make a new and definitive list of where vehicles currently operate;

- (ii) An intended use policy should be incorporated into the Private Hire Vehicle Policy - this would add weight to the Council when asking other local authorities to also implement such a policy to enable the management of cross-border hiring more readily;
- (iii) Window Tint Levels – this has been well documented from a collection of information from other authorities, and should be implemented as explained. Should this require further information, as suggested, then a date no later than two months should be assigned to this gathering of any further information needed. This time frame is also to be made available for further evidence to be given in favour of the argument from the trade;
- (iv) Exceptional Vehicle Criteria – the policy for extending a vehicle's plate was so constrictive that it was almost impossible to achieve. This needed to be addressed, as suggested within the comments supplied in response to the consultation;
- (v) Multi Media within Vehicles – a set date should be made for this item to be finalised, say two months from the implementation of the Policy;
- (vi) Operator Enforcement – the operator should not be given a time and date for a visit for enforcement. This is not given to hackney or private hire vehicles or drivers, and should not be given to operators; and
- (vii) Operator Fees – the fee structure for operator licences required addressing. The cost, for example, of one to 49 vehicles was not sustainable, and prevented people from starting a new company due to the cost. A company of 20 vehicles could have in the area of £22,000 income, where a 'one-man band' had zero income, and therefore was at a massive loss on these prices.

5.8 Hafeas Rehman (Sheffield Taxi Trades Association (STTA))

5.8.1 Mr Rehman stated that he had no objections to the draft Policy,

indicating that, in his opinion, the Council had been forward thinking and open-minded in connection with the drafting of the Policy, and would always try to work with all operators. He accepted that public safety was paramount, but stated that there was a need to give consideration to the safety of drivers also. Mr Rehman stated that he agreed, with some reluctance, with the four proposed conditions now referred to, as he considered that there was a need for the Council to be mindful of the wishes of all the different operators/drivers in terms of the restrictions that such conditions would place on them.

5.9 Virginia Halstead (Uber Driver)

5.9.1 Ms Halstead stated that she was not in favour of the four suggested conditions now referred to, indicating that she did not particularly like handling cash and that, whilst she would not want to work for two different companies, there was a need to give drivers the option. She also considered that customers should have a choice in how they wished to book their taxis.

5.10 Malcolm Billard (Uber Driver)

5.10.1 Mr Billard stated that he objected to the four proposed conditions now referred to, indicating specifically that he could not see any reasonable argument requiring operators to have a telephone line.

5.11 Ramis Naji (Hackney Carriage Driver)

5.11.1 Mr Naji stated that, as an independent driver, he objected to the four proposed conditions now referred to on the grounds that independent drivers or operators with very few vehicles would be the ones that would be penalised under the new Policy.

5.12 In addition to the comments set out in the report and the representations now made at the meeting, the Committee also considered representations submitted by Julie Hague, Sheffield Safeguarding Children Board, who indicated that the Board was in favour of the Policy, particularly the four additional conditions now referred to, on the basis that they are important to protect children, vulnerable passengers and operators.

5.13 Steve Lonnia reported on the options open to the Committee.

5.14 RESOLVED: That members of the public be excluded from the meeting before further discussion takes place on the grounds that, in view of the nature of the business to be transacted, if those persons were present, there would be a disclosure to them of exempt information as described in paragraph 5 of Schedule 12A to the Local Government Act 1972, as amended.

5.15 Marie-Claire Frankie reported orally, giving legal advice on various

aspects of the report.

5.16 At this stage in the proceedings, the meeting was re-opened to members of the public.

5.17 RESOLVED: That the Committee:-

- (a) notes (i) the contents of the report now submitted, (ii) the additional information now reported, (iii) the representations made by representatives of private hire vehicle operators and taxi trades operating in the City, and (iv) the responses to the questions raised;
- (b) approves the Private Hire Operator and Vehicle Policy, as attached at Appendix 'D' to the report now submitted, subject to the under-mentioned amendments, and with the majority of the Policy being implemented on 1st November, 2016, and the remaining elements, to be determined by the Chief Licensing officer, being implemented on a phased basis, with the trades and licensees being notified of such timescales:-

Private Hire Operator Policy

- (i) the deletion of Condition 2(d) in the section - Premises, in Part 6, on page 26 – “The operator premises must be staffed at all times that the operator is open for business”;
- (ii) the amendment to Condition 6(d) in the section – Public Complaints, in Part 6, on page 29, to read ‘The operator must ensure that customers can speak to a person in the event of a complaint or problem with the journey. Licensing officers and the police must also be able to access information immediately on request’;
- (iii) the deletion of Condition 7(h) in the section – Acceptance of Bookings, in Part 7, on page 29 – ‘The operator must have the ability to take a booking up to seven days prior to the commencement of the journey’;
- (iv) the amendment of Part 2 – Fit and Proper Person Requirement, on page 16, to read ‘ The Licensing Authority has adopted the Local Government (Miscellaneous Provisions) Act 1976, Section 55, in respect of a Private Hire Operator’s Licence. Contained in this Act is the ‘fit and proper’ test, which states:’ (the rest of the wording in this section remains unchanged);
- (v) the substitution of the words ‘issue a licence for a period of five years’ for the words ‘issue a licence for a

period not exceeding five years', in the first paragraph in the section - Policy – Objective 9 – Duration of Licence, on page 24;

- (vi) the following amendments to Part 6 – Private Hire Operator Conditions:-
  - (1) the substitution of the words 'the Act' in the definitions section of Part 6 – Private Hire Operator Conditions, on page 25, for the words 'The Act';
  - (2) the deletion, in paragraph 4(b), on page 28, of the words – 'In order to ascertain the legitimacy of such documents';
  - (3) the substitution of the word 'ceased' for the words 'first commenced' in paragraph 5(b), on page 28;
  - (4) the deletion in paragraph 7(a), on page 29, of the words - 'In order to ascertain the legitimacy of such documents'; and
  - (5) paragraph 7(g) in the section – Acceptance of Bookings, on page 29, be moved to Section 11 – Compliance with Other Legislation, on page 30 ;
- (vii) the deletion of the word 'Therefore', and the word 'the' now reading 'The', in paragraph 2 of Part 7 – Compliance and Enforcement, on page 31;
- (viii) the deletion of the word 'formal' in the fourth paragraph of the section – Better Regulation Unit: Enforcement Concordat – in Part 7 – Compliance and Enforcement, on page 32; and
- (ix) the substitution of the word 'instigated' for the word 'implemented' in the first paragraph of the section – Prosecution, in Part 7 – Compliance and Enforcement, on page 35;

*Private Hire Vehicle Policy*

- (i) the amendment of the wording in paragraphs (a) and (b) – Change of Operator in Part 14 to read 'The proprietor or such driver of the vehicle must notify the Council of all companies for which they are working, and must immediately notify the Council if they cease to work for any company. The vehicle must also display sole relevant door signage for each booking'

- (ii) the amendment of the second paragraph under Currently Licensed Vehicles, under the section Policy – Objective 3, in Part 7 – Vehicle Inspections and Testings, on page 50, to read:-
- Non-ULEV Private Hire Vehicles up to six years old – Tested annually;
  - ULEV Private Hire Vehicles up to six years old – Tested annually;
  - Non- ULEV Private Hire Vehicles over six years old – Tested bi-annually;
  - ULEV Private Hire Vehicles over six years old – Tested bi-annually;
- (iii) the deletion of the word ‘formal’ in the fourth paragraph in the Section – Better Regulation Unit: Enforcement Concordat, on page 66; and
- (iv) the addition of the following wording in the section – Private Hire Emissions, in Part 3 – Emissions, on page 41:-

“Emissions from Private Hire Vehicles can be reduced by encouraging better maintenance of vehicles and by switching off engines when stationary or idling, particularly when parked at the side of the road. It is proposed that anti-idling is tackled through education and promotion, not by formal enforcement.

Anti-idling signage will be provided where this can be practically achieved. Adoption of anti-idling legislation will however remain optional for the future, noting the desire for the Council to reduce enforcement burdens for businesses, and in recognition of the limited staff resources available to undertake such work”.