

19<sup>th</sup> September 2018

**Southern Taxis Group (South Coast Taxis) formal response to  
Lewes District Council Taxis Licensing Consultation.**

Firstly, Southern Taxis welcomes all changes that can improve the safety and wellbeing of both driver and passengers. Our company has always gone beyond the minimum to facilitate this continued improvement.

We would like to offer some observation on the following.

**Age limits,**

We agree with the guidance of the DFT, NATPHELO and the Law commission that such conditions are onerous. We believe even more so given the recent changes to MOT law and the fact the council already has a 6-month policy on testing. It is perfectly possible for an older car to be in good condition.

**Mandatory CCTV,**

Most of our vehicles are already compliant with this condition and go beyond the rather weak conditions being proposed by Licensing. This is a must have, to ensure safety for both driver and passenger. However there needs to be strict conditions on data control and independent (from driver/owner) responsibility for said data as well as the equipment itself.

**Approved Vehicle Specification,**

If adopted, we believe that this should be again in line with best practice, which states this list should be as wider range as possible.

**Vehicle Livery and Signage,**

We feel it is an important part of public safety to have clearly identifiable vehicles, however one must weigh up the cost implication in doing so. The cheaper and very effective means of this is to ensure that all vehicles have signage. This signage should include private hire or hackney carriage and the company's identity if working on or partly on a circuit. Both the rear, front and side should also display the vehicles license number. These factors are far more important than simply the colour of the vehicle.

To have part of a perfectly servable vehicle sprayed a different colour purely for identity, is not only onerous but environmentally unjust. To specify a single colour is again onerous and could influence the purchasing decision of an individual to purchase a vehicle that is less desirable purely because of the limited availability of a specific colour.

Kind regards

Mick Hildreth  
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Southern Taxis Group