

**V & F associates**  
**Mick Vaines, MLoL, Consultant**  
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6th July 2017

Dear Sir,

**Private Hire and Hackney Carriage Policy Review**

I am writing on behalf of Teesside Cars, Station Cars and Skyline Taxis with reference to your above policy review and the issues that you have raised in your on-line survey.

Whilst the simple survey has been completed by the above Private Hire Operators they consider that the proposed amendments, especially in relation to vehicle age restrictions and European Emission Standards have not been fully explained and/or justified with reasons.

The following comments are therefore made for your information and for you to comment on as appropriate.

**AGE RESTRICTION AND EMISSION STANDARDS**

These proposals are not supported.

At the present time the policy requires that all new applications must be in respect of vehicles that comply with Euro V emission levels and which are also exceptionally well maintained. This permits vehicles up to six years of age to be licensed and to remain licensed indefinitely so long as the vehicle continues to meet the Council's standards.

As the survey proposal does not make it clear could you confirm whether it is proposed to remove that part of the policy relating to emission levels and whether it is also proposed to remove or retain the requirement that the vehicle has to be exceptionally well maintained?

If the well maintained requirement is to remain as part of the policy requirement then could you please give your reasons as to why you now consider it necessary to introduce an age limit "to improve vehicle quality", bearing in mind you are no longer stipulating any emission level as a policy requirement?

Are you now saying that that your conditions relating to vehicle quality and/or testing are no longer considered fit for purpose and if so why are they not being addressed as an alternative to the introduction of an age policy and if they are considered to be adequate then could you please explain what difference the vehicle's age will make if it has to be exceptionally well maintained to the Council's prescribed standards?

Could you also explain your reasons as to why you now consider it necessary to introduce an arbitrary maximum age limit for vehicles of eight years, again bearing in mind that you appear to have abandoned your policy in respect of emission levels and if it is still a requirement for a vehicle to be exceptionally well maintained and if a vehicle complies with the Council's policy requirements in all other respects?

Your comments in respect of vehicles due for renewal between January 2017 and December 2018 not being relicensed if they exceed the 10 year age limit (e.g. Euro III and Euro IV) is not factually correct in that the current policy does not stipulate a maximum age policy and is based entirely on emission levels, which you are now appear to be abandoning, hence the comments above.

You have indicated that the proposed age limits will bring the Council in line with neighbouring authorities. Whilst commonality in respect of vehicle requirements is welcome my clients believe that this should be looked at in its entirety and not just in respect of the age requirement as one big difference is that the neighbouring authorities of Middlesbrough, Hartlepool and Redcar and Cleveland all permit the licensing of category C and D insurance write-off vehicles, subject to satisfactory engineers reports, whilst Stockton's policy does not permit such vehicles to be licensed. This enables such vehicles up to three years of age to be purchased at greatly reduced prices. Is the Council therefore prepared to change its policy in this respect if an age limit is introduced and if not why not as the recent legislative changes on cross border hirings enables private hire operators with multiple licences in neighbouring authorities to use vehicles licensed in a different authority, including insurance write-offs cat C and cat D, to carry out private hire work in Stockton?

The introduction of such age limits will also have a financial impact on my clients who have already carried out financial forecasts on their businesses on both the projected need for the replacement of existing vehicles and the licensing of new vehicles based on existing policy requirements. The Council is therefore requested to take into consideration the financial impact these changes will have on existing licence holders and in view of the current economic climate to either defer the introduction of these proposals or to allow existing licence holders a longer phased in period to comply with any new age limits introduced. My clients also believe that the extra financial burden will either result in them having to reduce the size of their businesses which will result in the loss of jobs, or eventually ceasing trading or being taken over by one of the larger operators who are able to absorb the additional costs and who are starting to gain a monopoly on the private hire trade, as demonstrated recently by the takeover of two small companies, namely Binks and Stockton Cars. Such monopoly reduces competition and choice and could ultimately lead to an increase in taxi fares for the residents of Stockton.

#### DISCLOSURE AND BARRING SERVICE CHECKS

Agreed.

#### WHEELCHAIR ACCESSIBLE VEHICLES

The same comments in respect of the first question in respect of age limits apply.

#### ADVERTISEMENTS, SIGNS AND NOTICES ETC

Agreed.

#### VEHICLE ROOF IDENTIFICATION NUMBERS

As you have not indicated could you confirm as to whether this been requested by the Police? And if so, why now?

It is understood that this requirement was introduced in Middlesbrough nearly twenty years ago with a view to the other neighbouring authorities introducing the same requirement after a trial period but it never happened. Why not? Is there now evidence that it is of value to the Police and are the other authorities in the Cleveland Police area making similar policy changes?

Also what will the cost of the stickers and who will be expected to pay that cost in respect of existing licensed vehicles?

I look forward to receiving your comments in due course and would be obliged if you could also advise me as to whether you will holding any meetings with the trade to discuss the outcome of your survey and comments received and as to the timescales for determining these proposals.

Yours sincerely,

M. R. Vaines MLoL

Licensing Consultant

Simon Mills  
Licensing Team Leader  
Stockton-on-Tees Borough Council  
Municipal Buildings  
Church Road  
Stockton-on-Tees  
TS18 1LD

Our Ref: DBW / Boro  
Your Ref:  
Date: 7 July 2017  
Please ask for: David Wilson

**Sent by email only to:**  
**simon.mills@stockton.gov.uk**

Dear Mr Mills,

### **Consultation response of Middlesbrough Borough Cars Limited Private Hire and Hackney Carriage Licensing Policy Review**

Thank you for inviting my client, Middlesbrough Borough Cars Limited to respond to the Private Hire and Hackney Carriage Licensing Policy Review consultation.

Please excuse my not using the online questionnaire, but as you will appreciate, it was necessary for me to secure confirmation from my client that the following accurately represents its views, which could not be done if I were to submit comments online.

For your convenience, I reproduce below the questions posed online, together with my client's answers and, where appropriate, additional comments.

Q refers to the Question posed by the Council, A refers to my client's Answer and C refers to my client's Comments, if any. For ease of reference, each Q, A and C are numbered.

#### **Q1: Age Restriction and European Emission Standards**

In the interests of improving vehicle quality and by default air quality, any application for a NEW hackney carriage or private hire vehicle licence will only be granted if the vehicle meets the maximum age requirements of 3 years old at initial application.

The renewal of an EXISTING hackney carriage or private hire vehicle licence will only be granted if the vehicle does not exceed the maximum of 8 years old for those vehicles due for renewal in 2019 and beyond.

Vehicles that are due for renewal between January 2017 and December 2018 will not be relicensed if they exceed to 10 years age limit (eg Euro III and Euro IV vehicles) this reflects current policy. This brings us in line with neighbouring authorities.

Do you agree with the above policy change?

**A1:** YES.

**C1:** My client agrees that everyone, especially those engaged in the transport industry that undertake substantially higher mileages than the average private motorist, have a responsibility to do what they can to reduce air pollution caused by petrol and diesel motor vehicles. We note that DEFRA is to publish the National Air Quality Plan (NAQP) on or before 31 July 2017 and urge the Council to also have regard to the NAQP when it is published.

**Q2: Disclosure and Barring Service Checks (DBS)**

To support safeguarding a criminal record check on a driver is an important safety measure. It is a requirement that all applicants undertake a DBS check with the Council at the time of first application and every 3 years thereafter. In order to protect and safeguard the public, the Council is proposing to implement the DBS update service which new applicants and drivers would have to subscribe to, which will allow officers carry out online status checks annually.

Do you agree with the above policy change?

**A2:** YES.

**C2:** My client agrees with this proposal for the reasons the Council has given.

**Q3: Accessibility – Wheelchair Accessible Vehicles (WAVs)**

In line with the proposal to move all other forms of licensed vehicles to an age related policy, it is recommended to introduce an age related policy for WAVs. It is proposed that new licences for vehicles will only be granted where the vehicle is no older than 5 years old at the date of initial application and a maximum vehicle age limit of 12 years old before being removed from the fleet. This requirement would be take effect at the renewal of the licence in 2019.

The age limit recommend recognises the higher initial costs to purchase a WAV and therefore the need to operate it longer to recover costs. The age limits also serve to promote and encourage WAVs on to the licensed fleet and is favourable compared to neighbouring authorities.

Do you agree with the above policy change?

**A3:** YES.

**C3:** Whilst my client agrees with the proposal for the reasons the Council has stated, the Council should also note that WAVs are not only more expensive to purchase, but they are more expensive to insure, maintain and run as they are less fuel efficient.

**Q4: Accessibility – Wheelchair Accessible Vehicles (WAVs)**

The Council needs to ensure that the number of WAVs in the fleet does not reduce. Therefore, it is proposed that all WAVs which are currently licensed can only be replaced with a like for like vehicle eg a wheelchair accessible vehicle which complies with current policy.

Do you agree with the above policy change?

**A4:** YES. Although it is assumed this relates to only hackney carriage WAVs, because the Council cannot apply quantity restrictions to private hire vehicles.

**C4:** My client has no further comment to make in relation to this question / proposal.

**Q5: Advertisements, Signs, Notices, etc**

The Council is proposing to amend the Policy which will require all companies / operators to submit ONE application to approve their livery and contact detail adverts for all vehicles. If companies / operators wish to use additional adverts, they will be required to complete a further application for approval.

Do you agree with the above policy change?

**A5:** NO.

**C5:** In different towns in the Borough, my client trades under different names / trading styles. The proposed change would either prevent my client from doing so or perversely require my client to apply for separate licences for each different trading identity so that each could then have one livery approved, which requirement would be contrary to the requirements of the Regulators' Code.

**Q6: Vehicle Roof Identification Numbers**

In order [to] help prevent and detect crime for both the licensed trade and members of the public the Council is proposing the introduction of vehicle roof identification stickers for all licensed vehicles.

**A6:** NO.

**C6:** My client does not accept that Vehicle Roof Identification Numbers contribute in any way whatsoever to the detection of crime, let alone the prevention of crime. As you are aware, my client is also licensed by Middlesbrough Council. Middlesbrough Council has for many years required Vehicle Roof Identification Numbers to be displayed on licensed vehicles. At no time, to the best of my client's knowledge, has any licensed vehicle ever been identified by the police or anyone else by its Vehicle Roof Identification Numbers. At my client's request, Middlesbrough Council is currently considering removing its requirement for licensed vehicles to display Vehicle Roof Identification Numbers. In the circumstances, unless the Council has material evidence that shows that Vehicle Roof Identification Numbers are reasonably necessary and that the costs of them are justified to achieve the Council's stated objective, the Council will be acting in breach of various provisions of the Regulators' Code (BRDO/14/705), a statutory code to which the Council is obliged to have regard in relation to hackney carriage and private hire licensing.

If you require clarification of any of the answers of comments contained herein or I can give any further assistance to the Council in connection with this consultation, please do not hesitate to contact me.

Whatever proposals are taken forward to the Licensing Committee for consideration, please note that I may wish to address the Licensing Committee and, in that regard, I would be obliged if you would kindly note this request and, if necessary, ask the Chair if he would be so kind as to grant me permission to address the Licensing Committee.

I look forward to hearing from you further in due course.

Yours sincerely,



**David B Wilson**

Licensing Consultant, Mediator and Trainer  
Consulting Editor, Paterson's Licensing Acts 2015-17  
Contributing Author, LexisPSL

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Dear Madam

### Private Hire and Hackney Carriage Policy Review

We the undersigned represent the views of the Stockton Hackney Carriage Drivers Association and the named Private Hire Operators below.

Having met together recently to reflect on your above proposals and comments made at the meeting with the trade we are united in saying that we do not at this time support your proposals regarding the introduction of new age limits with respect to licensed vehicles.

We are aware of the letter that has already been sent on behalf of some of the Private Hire Operators by Mr Vaines and fully support the comments and questions raised as the Council have given no reasons for their decision to introduce these new age limits.

We believe that such proposals will have a detrimental financial impact on all vehicle proprietors in view of the difference in purchase costs for replacement vehicles and as a consequence on all drivers and members of the public who use taxis and which is considered to be unacceptable in the current economic climate.

The Council predicted a regeneration of Stockton High Street with the proposed re-opening of the Globe Theatre, but this has not materialised and the night time economy is still at an all time low following the closure of other major venues in the area and so we would request that your proposals be deferred until your next policy review. This will hopefully see the predicted re-opening of the Globe as a major entertainment venue in the North East together with the new hotel which together will give a much needed boost to the local economy and benefit all concerned.

We are also aware that the All Parliamentary Group on Taxis have recently published a report on the future of taxi regulation which will be put to Parliament for consideration and which includes a recommendation in respect of the production of statutory guidance for taxi and private hire licensing and which should set out 'a robust set of minimum licensing standards for all licensing authorities to impose'. Again, another reason for deferring your proposals until your next policy review, as the production of such guidance will ultimately determine your policy.

We would also like to express our concerns regarding your consultation survey which was anonymous and you are therefore unable to determine who sent a response i.e. was it a member of the public, a member of the trade and if so was it hackney or private hire, driver, vehicle proprietor or operator? The method also permitted duplicate replies to be completed by one person and assumed all members the trade to be computer literate, consequently we believe your survey to be flawed and we would therefore question the accuracy of any statistical data produced from it.

We would respectfully suggest therefore that you reconsider and defer your proposals in light of our above comments and that a copy of this letter and the previous letter sent by Mr Vaines together with your response be submitted to the Licensing Committee for their consideration.

We await your further comments in this matter.

Yours sincerely



*T. Jones*  
SKYLINE TAXIS

*Shakeel Hussain*  
Shakeel Hussain  
Vice - chairman  
S.H.C.D.A

*M. H.*  
STATION CARS.



## Mills, Simon

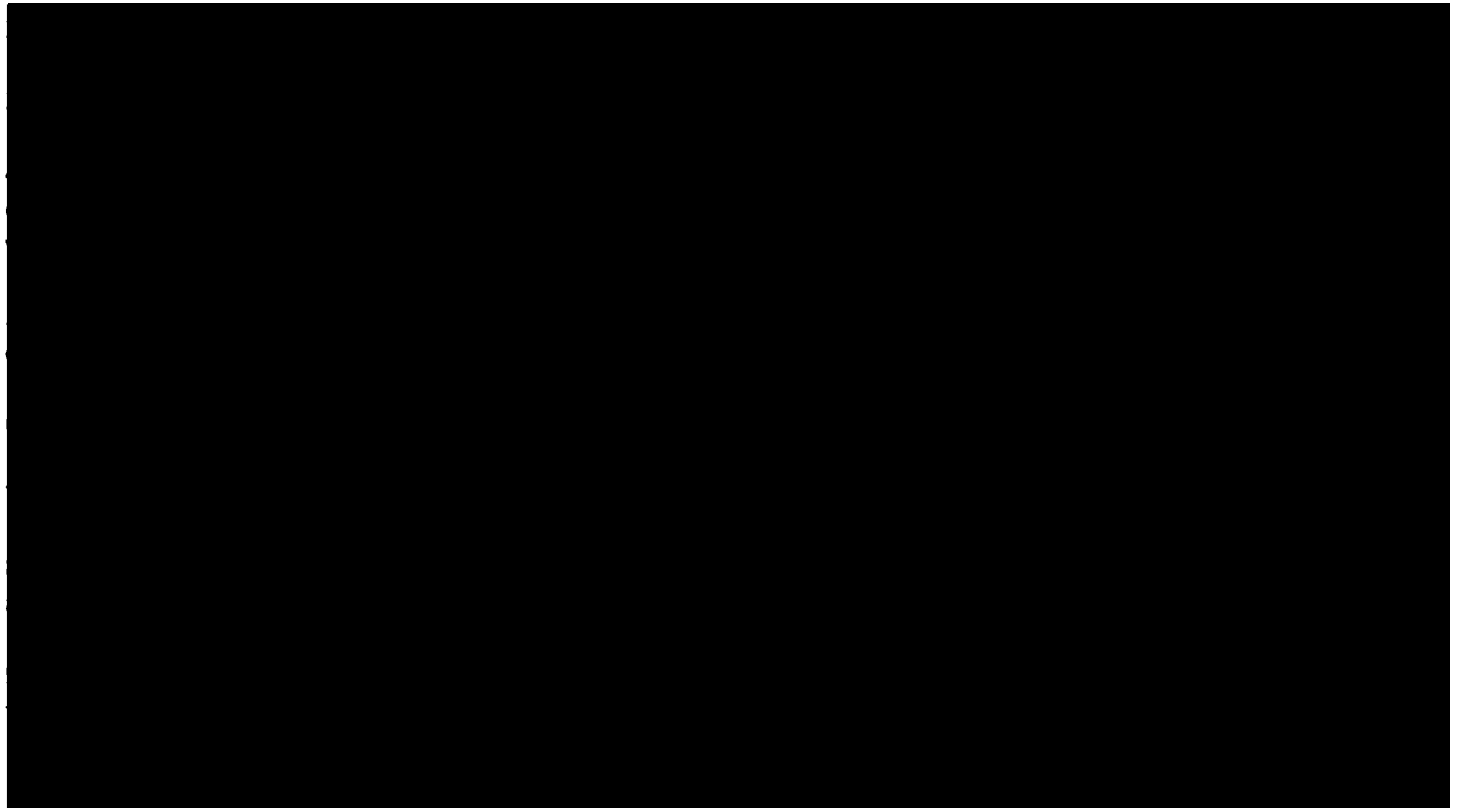
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**From:** Kyra Moy <Kyra@royal-taxis.co.uk>  
**Sent:** 04 July 2017 09:47  
**To:** Kitching, Jill; Mills, Simon  
**Cc:** Immy Khan; a.schiller@denningssolicitors.co.uk  
**Subject:** RE: Hackney Carriage & Private Hire Policy Consultation

Morning

The following list are changes we believe would benefit everyone in the taxi trade.

1) 3 years of age rather than euro emission would be easier to understand when adding a new vehicle.



Kind Regards

Kyra Moy  
**(Licensing Manager)**

North East Executive Ltd  
T/A Royal Cars and incorporating Hudson Taxis  
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Thornaby  
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Company Number 07110322  
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[www.royal-taxis.co.uk](http://www.royal-taxis.co.uk)



Age Restriction and European Emission Standards - Do you agree with the above policy change?	Comments	Disclosure and Barring Service Checks (DBS) - Do you agree with the above policy change?	Comments	Accessibility - Wheelchair Accessible Vehicles (WAVs) - Do you agree with the above policy change?	Comments	Accessibility - Wheelchair Accessible Vehicles (WAVs) - Do you agree with the above policy change?	Comments	Adverts, Signs, Notices, etc - Do you agree with the above policy change?	Comments	Vehicle Roof Identification Numbers - Do you agree with the above policy change?	Comments
No	i agree with the new vehicle being no more than 3 years old but i would prefer there to be an increase in tests for older cars from 2 to 4 a year. there would be very few cars not meeting euro 5 anyway due to natural wastage. in my own case, i have just spent over Â£2000 fitting new injectors and fuel pump to my vehicle, is clean and tidy with excellent body work. the engine is clean as a whistle but would not be renewed next year by this change. as i only have 2 cars this is going to put undue financial pressure on me	Yes		Yes		Yes		Yes		No	how will putting stickers on the roof of our cars stop or help detect crime? this seems a pointless exercise
No	As stated before we SHCDA had a meeting & all agreed the limit on a saloon vehicle should be 12 years & 14 years for a wheelchair accessible vehicle	Yes		Yes	Yes 12 years for saloon h/c & 14 years for a wav	Yes		Yes		No	You've got enough stickers & plates to identify ph & HC cars easily in Sbc without having to increase the cost of a plate or renewal
No	Drivers already struggling not much night life in stockton town drivers can't afford to buy less the three years old vehicles. I think Euro 4 emissions will be suitable standards.	Yes	I think this is a good idea	No	Minimum Euro 4 emissions standards should be implemented and 12 years restricted	Yes		Yes		No	
No	The new policy should be the EXISTING HACKNEY CARRIAGES AS LONG AS THE VEHICLE'S PASS THEIR MOT AND ARE ROAD WORTHY THEY SHOULD STAY ON THE ROAD. AS YU WELL NOW THE CURRENT CLIMATE IS NOT GREAT AND AFFORDABILITY TO BUY A NEW CAR..	Yes		No	We should have no limit on licenced vehicle along they pass the government requirements..			Yes		Yes	

Age Restriction and European Emission Standards - Do you agree with the above policy change?	Comments	Disclosure and Barring Service Checks (DBS) - Do you agree with the above policy change?	Comments	Accessibility - Wheelchair Accessible Vehicles (WAVs) - Do you agree with the above policy change?	Comments	Accessibility - Wheelchair Accessible Vehicles (WAVs) - Do you agree with the above policy change?	Comments	Adverts, Signs, Notices, etc - Do you agree with the above policy change?	Comments	Vehicle Roof Identification Numbers - Do you agree with the above policy change?	Comments
No	12 years	Yes		Yes		Yes		Yes		No	
No		Yes		No		Yes		Yes		No	
No	No need to ,the vehicles have two tests and an mot ,if it is fit enough keep it on the road if not suspend the plate.	No	I think 3 years should be good enough ... No need for every year	No	The other thing is what if the driver does not replace the vehicle then? He would lose his plate... one less WAV... The vehicle is old does not pass ,council can suspend the plate....	Yes		No	I think the council should make all private hire companies stop advertising their telephone number on the vehicle Never mind advertising....	No	No need it's just more cost , I think the vehicle has enough stickers on it for identification, Thank you
No	Due to the present position of work iris difficult to afford new car. There should be restriction of age. But the car must me low in emission and in good condition. If necessary the council must keep as Euro emission5	Yes		No		Yes		Yes		No	
No		No		Yes						Yes	
No	Taxi trade is very quiet. Carnt afford to put new cars on.	No		No		No		No		No	
No	Can you please stick with the old policy. And not to follow Middlesbrough council.	Yes		No		No				Yes	
No		No	Minimum should be 10 -12 years	No	Should be a maximum of 14 years.	Yes		No		No	
No	For new license 3 years age is ok but to renew age should be at least 10 years for saloon cars an12 for wheelchair access able.	Yes	Regular checkups are good if it doesn't costs drivers	Yes	Good	Yes	Good	Yes		Yes	
No	12 years old	No						Yes		No	
No		Yes		No	Along the vehicle pass the mot	Yes		Yes		Yes	



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No	The council needs to understand that we are nothing like the neighbouring councils..We have nowhere near the same population, have a handfull of night clubs and bars and very little night life facilities for a taxi driver to make the required amount which would justify buying a car which is 3 years old. Middlesbrough council licensing are out evey weekend protecting the livelihood of their drivers..Would SBC licensing be doing the same? They are allowed to use bus lanes..Are we... If you are looking ti follow suit with neighbouring councils then you need to provide the infrastructure for taxi drivers that they have.. SBC cant be seen to follow bits of other council policies which it sees fit and ignoring thr rest	No	Every other profession requires a check to be done every 3 years. Stop targeting Taxi drivers..Teachers have more interaction with children and they are only required to do a check every 3..Dont create 1 rule for one and 1 rule others	No	Same comment as question 1	Yes		Yes		No	
No		No		No		No		No		No	
No		No		No		No		No		No	
No		No		No		No		No		No	
No		No		No		No		No		No	
No	The council is creating a monopoly and driving small businesses out!!	No		No		No		No		No	







Age Restriction and European Emission Standards - Do you agree with the above policy change?	Comments	Disclosure and Barring Service Checks (DBS) - Do you agree with the above policy change?	Comments	Accessibility - Wheelchair Accessible Vehicles (WAVs) - Do you agree with the above policy change?	Comments	Accessibility - Wheelchair Accessible Vehicles (WAVs) - Do you agree with the above policy change?	Comments	Adverts, Signs, Notices, etc - Do you agree with the above policy change?	Comments	Vehicle Roof Identification Numbers - Do you agree with the above policy change?	Comments
No	The proposed changes are unjustified. I have recently put a hybrid car on, it is a 2012 plate. Due to proposed rules, I will be forced to purchase a new vehicle in three years. The reason I purchased this specific vehicle as I was under the impression it would be future proof as it is a zero-emission car. There is not enough Hackney work in this area for its drivers to be constantly purchasing new vehicles that meet these proposed standards. Furthermore, it is unreasonable to purchase a new car every eight years, especially that the resale value of a taxi drops dramatically in comparison to a private vehicle, therefore it is not economically viable for a driver in this area to do this as it can take longer to recuperate the initial cost of that taxi, maintenance, council fees, running costs and damage caused by passengers. I think Zero emission cars should be exempt from any changes as they are already environmentally friendly, or incentives should be given to change to a hybrid car.	Yes	Yes, as long as the driver does not have to pay for the annual checks.	No		No		Yes		No	
No	Its too expensive to buy a car that is less than 3 years old and to replace it within 8 years. In stockton, there is not enough work therefore we are not making enough money to be able to do this.	Yes		No	Saloon cars should be allowed for 12 years. The wheelchair accessible should be allowed for 14 years.					No	This is another burden on the taxi drivers plus more work for the council. It will also be more expensive.

Age Restriction and European Emission Standards - Do you agree with the above policy change?	Comments	Disclosure and Barring Service Checks (DBS) - Do you agree with the above policy change?	Comments	Accessibility - Wheelchair Accessible Vehicles (WAVs) - Do you agree with the above policy change?	Comments	Accessibility - Wheelchair Accessible Vehicles (WAVs) - Do you agree with the above policy change?	Comments	Adverts, Signs, Notices, etc - Do you agree with the above policy change?	Comments	Vehicle Roof Identification Numbers - Do you agree with the above policy change?	Comments
No	Can't afford to replace cars there is not enough ranks in stockton hard times already cannot afford to replace would be serious consequences a lot of drivers would be facing I.e jobventre	No	Costs of getting dbs annually can't afford the extra costs hard as it is don't need all this hassle	No	Council need extra wheel chair accessible vehicles on by putting age restrictions the number will decline because drivers haven't got funds to put newer cars on	Yes		No		No	
No		No		No		No		No		No	
No	Because their is no work at all its very hard to my living	Yes		No	No work with older vehicle every one gets a chance to work	No		No		No	Taxi are plated front and rear I don't think so it will make different
No	Stockton high street and surrounding areas are not taxi oriented. These days drivers can't afford to make even both ends meet. My opinion even euro emission 4 ok as long as it pass taxi test and M O T .	No	I think 3 years current policy is fine,but if council pay the full cost then I don't mind.	No	5 years old is not enough time ,as a owner driver can't afford to spend over £3000.00and even five years old car cost a lot of money,,especially when not a lot of work in area.	Yes	Personally it's all about like for like,disable friendly with same and saloon with saloon.	Yes	Yes agreed there must be a some sort of rules apply on such vehicles. Fully agreed.	No	I don't think it will help.crime inforcement agencies they know who doing wrong stuff.In cities where crime level high one can impose these conditions but for Stockton area I think this is not the right time.

Age Restriction and European Emission Standards - Do you agree with the above policy change?	Comments	Disclosure and Barring Service Checks (DBS) - Do you agree with the above policy change?	Comments	Accessibility - Wheelchair Accessible Vehicles (WAVs) - Do you agree with the above policy change?	Comments	Accessibility - Wheelchair Accessible Vehicles (WAVs) - Do you agree with the above policy change?	Comments	Adverts, Signs, Notices, etc - Do you agree with the above policy change?	Comments	Vehicle Roof Identification Numbers - Do you agree with the above policy change?	Comments
No	I am currently undergoing my application to acquire a license in Stockton area with the pure intention of avoiding Middlesbrough's new registration policy. Putting a car on the road at under 3 years old will strangle a lot of the drivers who wish to become independant and will subsequently cost much more money to get over the line in becoming more self sufficient and earning more money. On average a driver who must rent from the companies currently operating under Stockton Council, earn approximately Â£4 an hour due to excess charges which may also rise, and drivers who can afford to spend money on their own vehicle are earning approximately Â£9-10 an hour, which is much more than would be spent on the maintenance and administration costs of having their own car. Currently people are already earning well under minimum wage in this profession, I feel this will make it worse.	Yes	I have no problem whatsoever in this. A great idea, as it will maybe get some of the less honourable drivers off the road, and maintain a safe standard for all customers of the taxi trade.	Yes		Yes		Yes		Yes	I already operate as a taxi driver in Middlesbrough and to be honest, I do not see any issues in this as it is already commonplace. If this is going to reduce cost of enforcement, then so be it, it will save money that we as taxi drivers, and residents of the area will not have to pay elsewhere.
No	The renewal of existing vehicles should be 12 years not 8 The new application age requirement should be 6 years not 3 Euro IV should not have an age limit of 10 years rather it should be 14 years.	Yes	It is a good safety measure	Yes		Yes		Yes		Yes	

Age Restriction and European Emission Standards - Do you agree with the above policy change?	Comments	Disclosure and Barring Service Checks (DBS) - Do you agree with the above policy change?	Comments	Accessibility - Wheelchair Accessible Vehicles (WAVs) - Do you agree with the above policy change?	Comments	Accessibility - Wheelchair Accessible Vehicles (WAVs) - Do you agree with the above policy change?	Comments	Adverts, Signs, Notices, etc - Do you agree with the above policy change?	Comments	Vehicle Roof Identification Numbers - Do you agree with the above policy change?	Comments
No	The renewal of existing vehicles should be 12 years not 8 The new application age requirement should be 6 years not 3 Euro IV should not have an age limit of 10 years rather it should be 14 years.	Yes		Yes		Yes		Yes		Yes	
No	The renewal of existing vehicles should be 12 years not 8 The new application age requirement should be 6 years not 3 Euro IV should not have an age limit of 10 years rather it should be 14 years. Due to difficult times around 70% of taxi drivers are unable to afford new vehicles because of low wages	Yes		Yes		Yes		Yes		Yes	
No	The renewal of existing vehicles should be 12 years not 8 The new application age requirement should be 6 years not 3 Euro IV should not have an age limit of 10 years rather it should be 14 years. Due to difficult times around 70% of taxi drivers are unable to afford new vehicles because of low wages and not enough work in our area	Yes		Yes		Yes		Yes		Yes	

Age Restriction and European Emission Standards - Do you agree with the above policy change?	Comments	Disclosure and Barring Service Checks (DBS) - Do you agree with the above policy change?	Comments	Accessibility - Wheelchair Accessible Vehicles (WAVs) - Do you agree with the above policy change?	Comments	Accessibility - Wheelchair Accessible Vehicles (WAVs) - Do you agree with the above policy change?	Comments	Adverts, Signs, Notices, etc - Do you agree with the above policy change?	Comments	Vehicle Roof Identification Numbers - Do you agree with the above policy change?	Comments
No	We have this every 3 years the council wants the drivers to change the vehicle for s new ones... I would like to think not because its not easy ,can't afford to... if we can some help from the council for electric car ....then yes.... like Yorkshire council Â£4000 towards the costs You can take the old cars off like 3 and 4 e/missions..,which have been on the road for some time. Also the council gave extra two years for WAV (like 51 plate /04) to replace then, we should be give 3 yrs to replace any vehicle which is 10years old.	No	More checks and of course more money. ...	No	What ever it costs again ....	No	The council should help to put some more on ..... may be help with costs. ...	No	No advertising at all...	No	No benefits

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No	I fail to understand why there is a limit on the age of the vehicle when the sole duty of any working vehicle is to transport people from one destination to another; regardless of the age and as long as it meets the Euro emissions. So you're telling me that customers want to sit in new vehicles only? What's wrong with older vehicles that are already passing the test? Why create unnecessary policy changes and the cost of changing it? How come the council will not spend any money to make sufficient ranks for drivers? Do they fail to realise this is where the business lies? Why can the council not follow the neighbouring council to create these important ranks? Are we are easy targets? Yet private hires park anywhere they wish to and no one bothers to check them.	Yes		No	Should be given subsidy by the local authorities.	No	As long as vehicles are fit for the road and meet the Euro emissions, then leave them on.	No	Why create more unnecessary changes for vehicles? We have enough stickers on them, there is no need.	No	No need as we have enough stickers on the side. They will not bring any benefit. Would be better spending money on ranks which will mean that we will get more customers. Thank you.