

# Licensing Consultation Schedule of Responses

This is the schedule of responses to the consultation carried out by the Council in its capacity as Licensing Authority.

The consultation process was carried out from the 3<sup>rd</sup> of March 2022 to 30<sup>th</sup> June 2022 by means of written consultation, e-mail, public domain, and face-to-face meetings held with representatives of the local taxi trade.

All persons and bodies were provided with a copy of the draft policy.

The schedule sets out comments received from written representations.

Mark Brymer  
Principal Licensing Officer

## **Summary of responses to consultation:**

Despite the low response the statutory consultation process has been completed.

A range of views has been considered and amendments have been made where necessary to the draft policy.

Respondent	Comments	Outcome / Response
<b>Burbage Parish Council</b>	<p>Thank you for inviting Burbage Parish Council to consider HBBC's draft taxi licensing policy 2022.</p> <p>The information you provided was circulated to all Members and considered by the Council's Planning Committee at a meeting held Monday May 16.</p> <p>Members have no objections to the proposed draft.</p>	Comments noted.
<b>Mr Porter – Taxi Driver</b>	Thanks for the information you have supplied but I think this will finish me off and a few other taxis across the board.	Comments noted and considered.
<b>Mr Merrick – Taxi Driver</b>	<p><b>With reference to your document “HBBC Taxi Policy 2022”</b></p> <p>Dear Licencing department, After reading through your draft document “HBBC Taxi Policy 2022” I wanted to raise, and have noted, the following points: -</p> <p>The first point I would like to make is that I, and I am sure the majority of Hackney and Private hire drivers, fully support the councils aims to safeguard the public and cannot find anything within the document that should be changed apart from the following points: -</p>	<p>Comments noted and considered.</p> <p>Policy age limit for a vehicle to be licensed for the first time increased from 5 to 6 years from date of first registration with DVLA.</p> <p>To be granted a new plate all vehicles must meet one of the following vehicle emission standards:</p> <ul style="list-style-type: none"> <li>• Euro 6 petrol or Euro 6 diesel</li> <li>• Ultra-low emissions vehicle (ULEV)</li> <li>• Zero emissions vehicle (ZEV)</li> </ul>

**APPENDIX C  
Hackney Carriage Vehicle  
Specifications**

1. Vehicles that are licensed at the time this policy is adopted (whether they are wheelchair accessible or not) may continue to be licensed until they reach the maximum age of 12 years.

The above point is a departure from the current guidelines where a vehicle can be licensed for 15 years. If your new guideline is introduced some vehicle owners will be left in a position where their vehicle will “overnight” be unable to be used as a hackney carriage if they are between 12 and 15 years old and will need to be disposed of. As you stated on page 6 that you encourage environmental sustainability, I propose that you amend the wording to include that any currently licenced vehicles can continue to be licensed up to 15 years old, but any newly bought vehicles should conform to the new guidelines of 12 years maximum in age.

In respect to the following two paragraphs:

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- 3.** Any replacement or renewal of vehicles after December 2026 must be either ULEV, ZEV or wheelchair accessible vehicle, save those current holders of hackney carriage vehicle licenses for non-wheelchair accessible vehicles (i.e., saloons,

Vehicles that are licensed at the time this policy is adopted may continue to be licensed until either:

The vehicle fails the Ministry of Transport test at which point it will cease to be suitable for licensing; or they reach the maximum age of 15 years; or they do not meet the ULEV emission standard by December 2030.

hatchbacks, and estates) will continue to benefit from existing grandfather rights allowing them to replace their current vehicle, either during the licence period or at the expiry date of the licence.

**APPENDIX E VEHICLE EMISSIONS  
Existing Saloon Hackney Carriage &  
Private Hire Vehicles**

All existing saloon hackney carriage vehicles must be ultra-low emission or zero emission capable by December 2028. This is defined as a vehicle emitting less than 50gCO<sub>2</sub>/km and capable of travelling at least 70 miles without emissions at all.

The new guidelines indicate that vehicle owners with existing “grandfather rights” can continue to use their vehicles until their licence expires in 2026 at which point, they must dispose of their current vehicle and buy an ultra-low emission or zero emission vehicle. Again, this contradicts your aim to “encourage environmental sustainability” by forcing owners to dispose of their vehicle before the usual 12 year maximum is up which means that anyone replacing their vehicle in the next 3 or 4 years will only get 3 or 4 years of use of the new vehicle until it will need replacing to comply with your new guidelines. I would like to see the wording changed to reflect that anyone with “grandfather rights” at the start of 2026 can continue to use their vehicle until either it reaches its 12-year maximum age limit or fails its MOT retest as stipulated in the document. This will give

	current owners the confidence to replace their vehicles knowing that they can get the full 12-year maximum life out of it.	
<b>Rays Taxis</b>	Unhappy about the proposed change in vehicle age policy from 15 years to 12 years.	Comments noted and considered and discussed further at vehicle proprietors meeting.
<b>A1 Taxis</b>	<p>Happy to embrace new technologies once proven and range / charge times improve.</p> <p>Immediate concern is the proposed change in vehicle age policy.</p>	<p>Comments noted and considered and discussed further at meeting with vehicle proprietors.</p> <p>Outcome – Current vehicle age limits to remain at present, given the current cost of living situation and other factors on the international stage now is not the right time.</p>
<b>A2Z Taxis</b>	Unhappy about the proposed change in vehicle age policy from 15 years to 12 years.	Comments noted and considered.