



AGENDA ITEM: 6

SUMMARY

Report for:	Licensing, Health & Safety and Enforcement Committee
Date of meeting:	4th February 2014
PART:	1
If Part II, reason:	

Title of report:	Taxi and private hire vehicle licensing standards
Contact:	Ross Hill – Licensing Team Leader, Legal Governance
Purpose of report:	To outline proposed changes to the criteria for vehicles to be accepted for licensing as hackney carriages or private hire vehicles within Dacorum
Recommendations	<ol style="list-style-type: none"> 1) That Committee adopt the attached ‘Vehicle standards for hackney carriages’ and ‘Vehicle standards for private hire vehicles’ as the Council’s pre-licensing criteria for hackney carriages and private hire vehicles, with effect from the 1st June 2014; and 2) That officers shall monitor the average age of licensed vehicles for two years following the implementation of the revised criteria, and report any change or trends to Committee following that period.
Corporate objectives:	<p>Safe and Clean Environment</p> <ul style="list-style-type: none"> • Support the creation of a high quality, low carbon environment • Maintain a clean and safe environment
Implications:	<p><u>Financial</u> Under the revised proposals, there will be an additional charge for a second vehicle test per year for vehicles over 10 years of age, payable by licence-holders directly to the testing station.</p> <p><u>Health And Safety</u> More frequent tests for older vehicles will help to ensure that they are being maintained to a high standard, and will enable any mechanical or safety issues to be identified sooner.</p> <p><u>Value for Money / Risk / Equalities</u> No implications are expected to arise affecting these matters.</p>

Consultees:	The results of consultation with the licensed trade on the initial proposals are set out within. The revised proposal has been discussed informally with the Hackney Carriage Drivers Association.
Background papers:	None
Glossary of acronyms and any other abbreviations used in this report:	

1. BACKGROUND

- 1.1. The Council licences vehicles as hackney carriages under the Town Police Clauses Act 1847, and private hire vehicles under the Local Government (Miscellaneous Provisions) Act 1976. Both statutes permit the Council to set criteria in respect of the suitability, type, size and design of vehicles which will be licensed, and it is open to the Council to refuse to licence any vehicle the suitability of which it is not satisfied of, or which is not in a suitable mechanical condition, safe or comfortable. It is not enough that a vehicle can simply pass an MOT test – the Council must be satisfied that the vehicle is suitable for its proposed use, in addition to being safe and comfortable for passengers, before a licence may be issued.
- 1.2. The Council has previously adopted a number of criteria for the vehicles it will licence, which have been amended over time. Most recently, in 2012, a new criterion was applied to hackney carriages requiring those vehicles to be of type M1 whole vehicle approval, and compliant with the relevant European standards. Other changes have been made in respect of prohibiting the issue of a new hackney carriage licence to anything other than a wheelchair-accessible vehicle, the removal of a seat from multi-purpose vehicles so as to clear an access route to rear seats (later overturned), and exemptions in respect of stretch limousines.
- 1.3. Vehicle technology has continued to develop rapidly in recent years, with safety standards continuing to improve, engines delivering more power from smaller units, and emissions levels dropping. However, the Council's licensing criteria have not been reviewed as a whole in several years, and have not kept pace with automotive development.
- 1.4. The Council's criteria have become slightly muddled over time, with amendments being brought in piecemeal, and frequently applied only to one of the two categories of vehicle. It is now proposed to review the criteria, applying common standards to both categories of vehicle, and updating the requirements where appropriate to do so.
- 1.5. Recent consultations have also highlighted public concern over the average age of licensed vehicles in Dacorum (at the time of writing, 8.74 years for 'golden plate' hackney carriages, 7.86 years for wheelchair-accessible hackney carriages and 7.99 years for private hire vehicles), and the need to try and encourage the introduction of newer vehicles where possible.

2. INITIAL PROPOSAL AND CONSULTATION RESPONSE

- 2.1. An initial proposal to revise the applicable vehicle criteria was presented to the Committee on the 27th August 2013, seeking authorisation to commence consultation with the trade. The proposals instantly attracted attention, with a number of drivers attending that meeting in the mistaken belief that the Council would be immediately adopting the revisions without consultation. With the Committee's approval, details of the proposal were published on the council's website, in the taxi email newsletter, and via a direct mailshot (which summarised a number of active consultations). Comments on the proposal were invited with a deadline of the 1st November 2013.
- 2.2. The initial proposal detailed revised criteria for both hackney carriages and private hire vehicles, which consolidated a number of previous policy decisions and sought to establish some parity between the two sets of criteria. It was proposed to extend the 'M1' vehicle type requirement from hackneys only to both licences, to clarify the circumstances around the use of IVA tests and requirements for certificates of conformity, and to introduce a formal prohibition on 'dual plating'. However, the proposal which attracted the most attention and feedback was to introduce a 'maximum age on first licensing' policy for vehicles, under which a vehicle being licensed for the first time would have needed to be less than 5 years old at the time of licensing in the case of a non-accessible hackney carriage, and 7 years for accessible hackney carriages and all private hire vehicles.
- 2.3. It was stated in the original report that the initial proposals had been intended to provoke discussion, and a clear undertaking was given that officers would consider any feedback received before making a final recommendation.
- 2.4. A petition organised by the Hackney Carriage Drivers Association was received bearing 255 signatures (including a small number of duplicate entries) and a further 7 unsigned entries. The covering letter states the Association's opposition to the initial age limit proposal, and suggests instead a 12-year age limit. The other proposals are not addressed within the petition, although reference is made to current economic difficulties and the larger trade opportunities in other areas where age policies have previously been adopted. A copy of the petition is attached at Annex C.
- 2.5. A further 27 individual responses were also received, all of which opposed the proposed age limits, expressing a variety of concerns but the most frequent being affordability, citing a downturn in driver's earnings in recent years. Respondents also suggested that the proposed policy would lead to older vehicles being kept for as long as possible to avoid the cost of buying a newer vehicle, a potential issue around the temporary replacement of vehicles during repairs or maintenance, and doubt over whether the age policy proposal would lead to a safer fleet of vehicles for passengers. Copies of the individual responses are included at Annex D.
- 2.6. A number of responses suggest that Dacorum taxis would be put at an unfair disadvantage when compared to vehicles from neighbouring boroughs if the proposed age policies were introduced. By way of comparison, a summary of age policies adopted by other nearby authorities is appended at Annex E.
- 2.7. Very few of these responses addressed any other elements of the proposals. A couple of responses refer to the requirement that vehicles should be 'dent-

free'. This was unchanged from the current criteria, and is interpreted as no obvious dents, on panels pressed inwards. Smaller imperfections, such as door dings and stone-chips are not currently a bar to licensing (unless a single panel is excessively marked with such), and it is not envisaged that this approach would change. The Council's compliance standards, which form the basis for the additional checks carried out during vehicle tests, make provision for minor damage of this type.

3. REVISED PROPOSAL

3.1. After considering the feedback received, officers have made amendments to the most contentious parts of the proposals.

3.2. In respect of vehicle age, after consideration of the feedback received during consultation (including a number of salient points about the effect of such a policy on other operational aspects), officers are now recommending that the initial proposal should not be progressed. Instead, a revised requirement is now proposed, under which vehicles which are older than 10 years at the time of the issue of the annual licence, will be required to complete a second MOT and compliance test half-way through the licence period. Licence-holders would be responsible for arranging and paying for the relevant test directly with the council's authorised testing station. If a vehicle failed to complete an additional test in the required period without good reason, a suspension notice would be issued. A number of respondents highlighted that compliance testing was a more suitable tool to ensure higher standards than a simple age policy, and this option should also provide a means to ensure that older vehicles are being correctly maintained, and alert owners earlier to any developing faults arising from the age of the vehicle. The additional cost of a second test may also act as an incentive to replace older vehicles.

3.3. As of the time of writing, this proposed age policy would affect the following number of vehicles:

Vehicle type	Total number licensed	Number aged over 10 years	%
Hackney carriage:			
<i>Non-wheelchair only</i>	189	62	32.8%
<i>Wheelchair-access only</i>	52	11	21.2%
Total	241	73	30.3%
Private hire vehicle:			
<i>Standard usage</i>	154	40	26.0%
<i>Exempt/specialist vehicle</i>	19	4	21.1%
Total	173	44	25.4%

3.4. While there are benefits to requiring newer vehicles for licensing (such as ensuring the latest technologies and safety standards, as well as typically lower emissions levels than equivalent older vehicles), there is clearly also a need to take account of economic considerations. In this respect, the revised

proposal is considered to be the most suitable policy, offering an incentive to replace older vehicles, but not imposing undue financial barriers to entering the trade. However, there will be a need to monitor whether any improvement occurs in vehicle ages as a result of the implementation, and as such it is suggested that, if the Committee are minded to adopt the recommendation below, officers will track this data over the next 2 years, with a view to reporting any change to Committee after that period.

- 3.5. Initial discussions have been held with the appointed testing station about the possibility of additional tests, who have confirmed that they have sufficient capacity to facilitate these.
- 3.6. The other parts of the proposal are unchanged from the original report.
- 3.7. The M1 type policy, first applied to hackney carriages in 2012 but omitted from private hire criteria, ensures that only vehicles which have been designed and built for the safe carriage of no more than 9 persons (including driver) are being licensed. This policy also ensures that vehicles which have been modified from other vehicle types (e.g. from larger passenger vehicles which have had seats removed, or from goods vehicles), and which may not satisfy the relevant European safety standards applying to M1 vehicles are not considered for licences. For this reason, it is proposed to extend this policy to cover private hire vehicles. An amendment to the policy also deals with vehicles which have been converted in accordance with approved specifications, and have been certified as conforming to the relevant type and safety standards – a significant number of purpose-built taxis and wheelchair-carrying vehicles are now manufactured and approved in this way, and would currently fall outside of the policy.
- 3.8. The Council is of course free to depart from any criteria it has set when considering a particular vehicle, if the merits of the particular case in question warrant doing so. However, it is envisaged that this power will only be used in exceptional circumstances, and by no means will it be a regular occurrence – the standards should be set at a suitable level that will prove appropriate in the vast majority of cases. This power has previously been delegated to senior officers, subject to a right of appeal against a refusal to grant an exemption to the Committee.
- 3.9. This report contains proposals on the standard of vehicle that will be licensed, and does not refer to the conditions that may be applied to the vehicle's licences, nor does it stipulate compliance standards against which vehicles are tested. It is intended to review and report on these conditions and compliance standards, with suggested amendments, later this year.
- 3.10. This report also omits the specifications expected of stretch limousines and other novelty vehicles (e.g. decommissioned fire engines / ambulances / military vehicles, converted ice cream vans, etc, which are used to carry passengers), a number of which have been licensed as private hire vehicles. Again, it is intended to conduct a review of these specifications following a report later this year. Other types of vehicles which may also be licensed, such as horse-drawn carriages or non-motorised vehicles, will also be considered outside of these standards.
- 3.11. The following documents are attached to this report:

Annex A – proposed criteria for hackney carriages
Annex B – proposed criteria for private hire vehicles

4. RECOMMENDATIONS

- 4.1. That Committee adopt the attached 'Vehicle standards for hackney carriages' and 'Vehicle standards for private hire vehicles' as the Council's pre-licensing criteria for hackney carriages and private hire vehicles, with effect from the 1st June 2014.
- 4.2. That officers shall monitor the average age of licensed vehicles for two years following the implementation of the revised criteria, and report any change or trends to Committee following that period.

Proposed criteria for hackney carriages

Licensing, Dacorum Borough Council, Civic Centre, Marlowes, Hemel Hempstead, HP1 1HH

**Vehicle standards for hackney carriages**

Dacorum Borough Council will require vehicles presented for licensing as hackney carriages to satisfy the following criteria:

Vehicle specification

1. The vehicle must be suitable in type, size and design for its proposed use, and must satisfy the following requirements:
 - a. The vehicle must be a vehicle with four road wheels, which is authorised for use on public roads in Great Britain;
 - b. The vehicle must be right-hand drive;
 - c. The vehicle must be in a suitable mechanical condition, free of rust and dents, safe and comfortable;
 - d. The vehicle must have sufficient seating capacity to carry not less than four and not more than eight passengers in addition to the driver. (The seating capacity is determined on the assumption that allowance is made for a rear seating width of approximately 400 mm (16") per passenger measured laterally along the widest part of the seat and where arm rests are positioned over such seats the measurement shall be taken between arm rests).
2. The vehicle must:
 - a. Be a saloon, estate, hatchback or multi-purpose vehicle with:
 - i. at least four doors capable of being opened outwards from the near and offside of the vehicle to an angle of at least 60 degrees, or slide open to their fullest extent;
 - ii. an engine capacity of not less than 1400cc;
 - iii. all seats facing forwards or rearwards, and each fitted with an inertia seat belt per passenger, except continuous rear seats where centre belt may be lap type; and
 - iv. a suitable space separated from the passenger compartment for the safe carriage of luggage; or
 - b. Be a 'London' type taxi; a purpose-built taxi or a similar large passenger carrying vehicle (with seating for no more than eight passengers), with:
 - i. at least four doors, either hinged or sliding, and a rear tail-gate that must be capable of opening to their full extent. There must be at least one door on either side of the vehicle for passenger loading;
 - ii. an engine capacity of not less than 1800cc;
 - iii. all seats facing forwards or rearwards, and each fitted with a seat belt restraint per passenger per seat; and
 - iv. a vehicle capable of carrying passengers in wheelchairs must be equipped to safely load and restrain every wheelchair and its occupant securely. The wheelchair may face either forwards or rearwards. The vehicle must have a ramp or lift to load the wheelchair from the near side or rear.

Type approval

3. All vehicles must comply with British and European vehicle regulations, be approved to the standard of type M1 European Whole Vehicle Type Approval (EWVTA), and materially unaltered from the type approval specification. A certificate of conformity bearing the vehicle's

unique identification number which relates to an M1 whole vehicle type approval may be required. This requirement is subject to the following provisions:

- a. The Council may, at its discretion, accept vehicles converted and certified as conforming to a national Small Series or Low Volume Type Approval in place of the above requirement, providing no further modifications have been made to the vehicle since conversion. A certificate of conformity, bearing the vehicle's unique identification number, will be required as evidence of the satisfactory conversion.
- b. Proprietors of vehicles which have been modified from an original type approval specification must additionally provide proof of type conformity by way of successful completion of a voluntary Individual Vehicle Approval (IVA) test to M1 standards at a Vehicle and Operator Services Agency (VOSA) testing station, following completion of the modification and with any additional equipment (e.g. wheelchair access/restraints) in place. In such cases, the original vehicle, prior to modification, must be of M1 EWWTA Approval.
- c. Vehicles converted from other base vehicle types (e.g. M2 or N1) will not be accepted for licensing, unless converted and certified in accordance with sub-paragraph a.

Roadworthiness inspection and compliance test

4. The vehicle must attend the Council's authorised testing station and undergo a roadworthiness inspection ('MOT test'), and a compliance test against the relevant specifications set by the Council. The vehicle must satisfactorily complete both elements of the test before it may be considered for licensing.

Egress from rear seating

5. Multi-purpose vehicles (MPV's) which feature rear seating without direct unimpeded access to a door (i.e. if it is necessary to tilt or fold a seat in the middle row to gain access to a door adjacent to the middle row of seats) must feature a device enabling the rear door of the vehicle to be opened from the inside of the vehicle, permitting emergency egress from the rear seats. Under no circumstances shall a seat installed by a manufacturer be removed from the vehicle, unless replaced by a seat of identical construction and safety standards.

Age of vehicle

6. A vehicle which, on the date of issue of a licence is older than **10 years** (as calculated from the date of first registration shown on the V5C registration certificate) shall be required to complete an additional MOT and compliance test through the Council's authorised testing station, within a period of 28 days prior to the day 6 months prior to the expiry of the licence, and to submit the results to the Council no later than that day.

Dual plating

7. A vehicle will not be licensed as a hackney carriage if it is already licensed as a hackney carriage or as a private hire vehicle, by Dacorum or by any other authority. Evidence of the surrender of any applicable licence will be required prior to the issue of a licence.

Wheelchair accessibility

8. A hackney carriage vehicle licence will only be granted in respect of a vehicle which is safely accessible to a disabled person in their wheelchair and must be able to carry the person in safety and in reasonable comfort whilst remaining within their wheelchair.

(Note: The above requirement will not apply to the licence renewal or to the substitution of a vehicle to an existing licence, where a licence for a non-accessible vehicle was held prior to 1 April 2004, providing that the licence has been maintained continuously since then without revocation or lapse, and at no point since that time has a wheelchair-accessible vehicle been substituted to the licence).

N.B. Vehicles which do not satisfy certain of the above requirements may be considered for licensing in exceptional circumstances, at the discretion of the Council. Please contact a licensing officer to discuss prior to making an application or purchasing a vehicle.

ANNEX B

Proposed criteria for private hire vehicles

Licensing, Dacorum Borough Council, Civic Centre, Marlowes, Hemel Hempstead, HP1 1HH



Vehicle standards for private hire vehicles

Dacorum Borough Council will require vehicles presented for licensing as private hire vehicles to satisfy the following criteria:

N.B. Alternate standards will be applied to stretched limousines and novelty vehicles, presented for licensing.

Vehicle specification

1. The vehicle must be suitable in type, size and design for its proposed use, and must satisfy the following requirements:
 - a. The vehicle must be a vehicle with four road wheels, which is authorised for use on public roads in Great Britain;
 - b. The vehicle must be right-hand drive;
 - c. The vehicle must be in a suitable mechanical condition, free of rust and dents, safe and comfortable;
 - d. The vehicle must have sufficient seating capacity to carry not less than four and not more than eight passengers in addition to the driver. (The seating capacity is determined on the assumption that allowance is made for a rear seating width of approximately 400 mm (16") per passenger measured laterally along the widest part of the seat and where arm rests are positioned over such seats the measurement shall be taken between arm rests).
2. The vehicle must:
 - a. Be a saloon, estate, hatchback or multi-purpose vehicle with:
 - i. at least four doors capable of being opened outwards from the near and offside of the vehicle to an angle of at least 60 degrees, or slide open to their fullest extent;
 - ii. an engine capacity of not less than 1400cc;
 - iii. all seats facing forwards or rearwards, and each fitted with an inertia seat belt per passenger, except continuous rear seats where centre belt may be lap type; and
 - iv. a suitable space separated from the passenger compartment for the safe carriage of luggage; or
 - b. Be a large passenger carrying vehicle (with seating for no more than eight passengers), with:
 - i. at least four doors, either hinged or sliding, and a rear tail-gate that must be capable of opening to their full extent. There must be at least one door on either side of the vehicle for passenger loading;
 - ii. an engine capacity of not less than 1800cc;
 - iii. all seats facing forwards or rearwards, and each fitted with a seat belt restraint per passenger per seat; and
 - iv. a vehicle capable of carrying passengers in wheelchairs must be equipped to safely load and restrain every wheelchair and its occupant securely. The wheelchair may face either forwards or backwards. The vehicle must have a ramp or lift to load the wheelchair from the near side or rear.
3. The vehicle must not resemble a 'London' type or purpose-built taxi or be of such design to lead any person to believe the vehicle is a taxi.

Type approval

4. All vehicles must comply with British and European vehicle regulations, be approved to the standard of type M1 European Whole Vehicle Type Approval (EWWTA), and materially unaltered from the type approval specification. A certificate of conformity bearing the vehicle's unique identification number which relates to an M1 whole vehicle type approval may be required. This requirement is subject to the following provisions:
 - a. The Council may, at its discretion, accept vehicles converted and certified as conforming to a national Small Series or Low Volume Type Approval in place of the above requirement, providing no further modifications have been made to the vehicle since conversion. A certificate of conformity, bearing the vehicle's unique identification number, will be required as evidence of the satisfactory conversion.
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5. The vehicle must attend the Council's authorised testing station and undergo a roadworthiness inspection ('MOT test'), and a compliance test against the relevant specifications set by the Council. The vehicle must satisfactorily complete both elements of the test before it may be considered for licensing.

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6. Multi-purpose vehicles (MPV's) which feature rear seating without direct unimpeded access to a door (i.e. if it is necessary to tilt or fold a seat in the middle row to gain access to a door adjacent to the middle row of seats) must feature a device enabling the rear door of the vehicle to be opened from the inside of the vehicle, permitting emergency egress from the rear seats. Under no circumstances shall a seat installed by a manufacturer be removed from the vehicle, unless replaced by a seat of identical construction and safety standards.

Age of vehicle

7. A vehicle which, on the date of issue of a licence is older than **10 years** (as calculated from the date of first registration shown on the V5C registration certificate) shall be required to complete an additional MOT and compliance test through the Council's authorised testing station, within a period of 28 days prior to the day 6 months prior to the expiry of the licence, and to submit the results to the Council no later than that day.

Dual plating

8. A vehicle will not be licensed as a private hire vehicle if it is already licensed as a hackney carriage or as a private hire vehicle, by Dacorum or by any other authority. Evidence of the surrender of any applicable licence will be required prior to the issue of a licence.

N.B. Vehicles which do not satisfy certain of the above requirements may be considered for licensing in exceptional circumstances, at the discretion of the Council. Please contact a licensing officer to discuss prior to making an application or purchasing a vehicle.

Petition from Hackney Carriage Driver's Association

Petition against Vehicle age limit
Taxi Drivers Association

Dacorum Borough Council Licensing Committee

25th Oct 2013

Head of Licensing Department Dear Sir/Madam,

We the taxi drivers of dacorum have gathered a signed petition by 262 drivers, sanguinely hoping that persons at the helm will take cognizance of the below points raised and address them at the earliest opportunity. This is a serious matter which affects the livelihood of over 500 drivers and their families, so it requires urgent attention.

We are strongly opposed to the proposal put forward by the licensing department setting a vehicle age limit of no older than 5years and disabled access being no older than 7 years. The trade feels that this is not a viable time to implement such a proposal, in the current economical downturn. The majority of businesses are currently struggling to survive. There a number of factors that need to be taken into consideration:

The financial implication to drivers having to upgrade vehicles is considerably high, and very few drivers could afford to fulfil this obligation. The extra cost to obtain such vehicles will lead to a considerable number of drivers being forced out of the taxi trade and into unemployment. The age restriction may force vehicle proprietors to purchase lower quality vehicles with high mileage depending on their budget. The Taxi trade is undergoing major changes with the current Taxi rank being forced to move to a new location, this will also have considerable financial implications on drivers. Also with rising fuel and insurance prices it is already difficult to earn a living. As well as this, the enforcement against foreign plate drivers from other boroughs is appalling and is having considerable financial implications on the dacorum borough drivers.

The Dacorum Borough does not have the volume of business in comparison to other towns such as Watford and Luton. These towns have major Train routes, hospitals, large shopping centres and also alot more night time trade. Luton also benefits from a main Airport, university and also benefits from a much higher population.

We feel if the vehicle passes the compliance test and the MOT, then the age should not be a deciding factor. The safety of customers is paramount, so if the vehicle is meeting all the safety aspects then the age limit should not be a legal requirement.


We would also like to bring to your attention that this age limit policy has only been implemented by some Council and thus is not a country wide policy. There is also an indication that the councils which have adopted this vehicle age limit also have higher fares than Dacorum.

We the association would recommend setting a vehicle age limit of 12 years for both types of vehicles. This recommendation is a fairer policy that is also financially more viable to drivers.

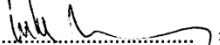
Please find attached 16 pages of signed petition of 262 drivers opposing the above proposal.

Regards

Tabrez Khan (Chairman)



Luke Mcilvaney (Vice Chairman)



Taxi Drivers Association

**Petition against proposal vehicle age limit
Hackney Carriage Taxi Drivers Association**

Name	Address	Email / Tel	Badge No	Signature
1. TABBAZ KHAN			HD 319	TABBAZ KHAN
2. MOHAMMED FANOOZ AHMED			281	FANOOZ AHMED
3. IJAZ KHAN			278	IJAZ KHAN
4. M. I. KHAN			PD 182	M. I. KHAN
5. F. M. KHAN			HD 248	F. M. KHAN
6. SAHIR			HD 299	SAHIR
7. HASEEB			HD 322	HASEEB
8. Asim Hussain			HD 312	ASIM HUSSAIN
9. Gioban Jhan			HD 370	GIOBAN JHAN
10. SAFEER AHMED			HD 118	SAFEER AHMED
11. WAHAB MIRZA			HD 317	WAHAB MIRZA
12. M. IJAZ			HD 087	M. IJAZ
13. SAFIYAH			HD 10	SAFIYAH
14. M. MAHROOF			HD 091	M. MAHROOF
15. G. RAJOOB			HD 75	G. RAJOOB
16. RUPAN			HD 210	RUPAN
17. G. KHAN			HD 081	G. KHAN
18. S. VESALIA			PD 43	S. VESALIA
19. N. KHAN			129	N. KHAN
20. M. SAJJID			161	M. SAJJID
21. M. ULHASS			MAIL COM.	M. ULHASS
22. A. KHAN			787	A. KHAN
23. M. LATIF			309	M. LATIF

QTY (23)

SIGNATURE: (262)

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**Petition against proposal vehicle age limit
Hackney Carriage Taxi Drivers Association**

Name	Address	Email / Tel	Badge No	Signature
1. Abrar Khan			HD 144	ABRAR KHAN
2. M. ESSO/NE			HD 252	M. ESSO/NE
3. C. VENNOR			MD 014	C. VENNOR
4. M. ASHRAF			HD 213	M. ASHRAF
5. G. N. TAYEB			HD 170	G. N. TAYEB
6. B. WILLIAMS			HD 104	B. WILLIAMS
7. K. AZIZ			HD 15	K. AZIZ
8. B. KRAZI			HD 168	B. KRAZI
9. A. MOJIB			122	A. MOJIB
10. P. PUNJ			227	P. PUNJ
11. W. ABID HUSSAIN			315	W. ABID HUSSAIN
12. MATHBOOB			HD 36	MATHBOOB
13. CSAMIRULLAH			HD 239	CSAMIRULLAH
14. IMRAN KHAN			HD 175	IMRAN KHAN
15. P. WALKER			037	P. WALKER
16. MUKHTAR			275	MUKHTAR
17. MADRAS			HD 127	MADRAS
18. M. HANAWAN			HD 082	M. HANAWAN
19. A. JELVIS			HD 060	A. JELVIS
20. A. TAYSS			HD 179	A. TAYSS
21. S. HAZARATI			HD 128	S. HAZARATI
22. A. ALI			HD 326	A. ALI
23. N. KHAN			HD 174	N. KHAN

QTY (23)

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**Petition against proposal vehicle age limit
Hackney Carriage Taxi Drivers Association**

Name	Address	Email	Badge No	Signature
1. Jamil			HD 059	[Signature]
2. ASSAD			HD 096	[Signature]
3. 'INDRAT			HD 343	[Signature]
4. M. AKHAT			HD 164	[Signature]
5. M. TAFFI K			HD 090	[Signature]
6. M. MALOM			PD 910	[Signature]
7. M. INTIAZ			PD 164	M. Gumbry
8. M. Adrees			HD 122	[Signature]
9. R. Poin			HD 226	[Signature]
10. Y. AROUCHE			HD 011	[Signature]
11. SPATH			HD 098	[Signature]
12. SHAKEL			BS1	[Signature]
13. ASIA KHUSRA			HD 312	[Signature]
14. Z. NI			HD 331	[Signature]
15. K. Shadford			HD 139	[Signature]
16. RANM KHAN			310	[Signature]
17. M. TAFFI			HD 036	[Signature]
18. M. I. ALI			HD 361	[Signature]
19. SAIFOR. BIDD			HD 119	[Signature]
20. M. IGHMANED ISHAK			HD 347	[Signature]
21. SHAKEL AHMED			HD 073	[Signature]
22. GULIPAD			HD 44	[Signature]
23. TABREZ KHAN			PD 319	[Signature]

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**Petition against proposal vehicle age limit
Hackney Carriage Taxi Drivers Association**

Name	Address	Email / Tel	Badge No	Signature
1. TABREZ KHAN			HD 159	[Signature]
2. M. UHABUDDIN			HD 268	[Signature]
3. RAJAT KHAJURJI			HD 217	[Signature]
4. M. GULSHI			HD 049	[Signature]
5. M. SALEEM			HD 316	[Signature]
6. F. KALEMBA			HD 121	[Signature]
7. MASOOD KHAN			HD 186	[Signature]
8. MDHAMMAD FISHK			HD 325	[Signature]
9. SAQIB MAJID			HD 161	[Signature]
10. ASAD KHAN			HD 318	[Signature]
11. JINGMAY KONG			HD 343	[Signature]
12. ASAD/MOHAMMAD			156	[Signature]
13. PI BISHALI			HD 211	[Signature]
14. T. GANESAN			HD 129	[Signature]
15. JEFF HANES			PD 913	[Signature]
16. SIMEN HEBBS			HD 238	[Signature]
17. SYFAYAZ			HD 250	[Signature]
18. J. USMAN			HD 208	[Signature]
19. M. AHMED			HD 093	[Signature]
20. G. GILANI			HD 044	[Signature]
21. GULRAZ KHAN			HD 286	[Signature]
22. MANISHA KHAN			PD 210	[Signature]
23. AMR AB			HD 263	[Signature]
Z. AHMED				[Signature]

Con.

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**Petition against proposal vehicle age limit
Hackney Carriage Taxi Drivers Association**

Name	Address	Email	Badge No	Signature
1. M. AZAD			HD 306	
2. A. ADILYAS			PD 138	
3. Mubarak Ali			PD 219	
4. IMRAN KHAN			HD 239	
5. ALI SETTOUL			PD 104	
6. MAZAN KHAN			HD 47	
7. Syahid (Prakash Mead)			PD 288	
8. AKSUK CAMP			HD 294	
9. ZIPPORHO QURESHI			PD 274	
10. LASHAD KHAN			HD 290	
11. GEORGE FOUZ			HD 298	
12.			HD 187	
13. S.M. BILAL			PD 093	
14. G. HOSES			PD 143	
15. Z. FAROOQ			HD 100	
16. M. HARIF			PD 112	
17. NOORAMMED KHAN			HD 271	
18. M. KHAN			HD 32	
19. N. KHAN			PD 193	
20. A. SYHAR			PD 070	
21. A. AHMED			PD 25	
22. J. KHAN			PD 14	
23. N. MEHMOOD				

**Petition against proposal vehicle age limit
Hackney Carriage Taxi Drivers Association**

Name	Address	Email	Badge No	Signature
24. R. KHAN			PD 41	
25. T. REZA			HD 236	
26.			HD 346	
27. A. KHAN			PD 317	
28. W. ADIP YOUSUF			PD 149	
29. ZAHIR SIDDIQI			PD 105	
30. KELVIN			PD 271	
31. S. PHILLIPS			PD 097	
32. A. ELA-TAMMI			PD 005	
33.			HD 48	
34. S. JAFARI			HD 12	
35. NALAKSI			PD 261	
36. ZIA KHAN			HD 135	
37. S. MOSSAN			PD 241	
38. SAJJAD ALI			PD 33	
39. SALEM KHAN			HD 288	
40. SAJJAD KHAN			HD 185	
41. M. KHAN			PD 114	
42.			HD 157	
43.			PD 140	
44. ISMAIL ALI			HD 259	
45. GUDAM JAFAR			HD 374	
46.			PD 096	

**Petition against proposal vehicle age limit
Hackney Carriage Taxi Drivers Association**

Name	Address	Email	Badge No	Signature
47 DUNNETT			PD 77	[Signature]
48 JINAFU AHMED			PD 234	[Signature]
49 TKHAN			HD 26	[Signature]
50 C. BIEK			PD 21	[Signature]
51 J. HERRERA			PD 244	[Signature]
52 M. NAGEEM			HD 226	[Signature]
53 S. KHAN			PD 309	[Signature]
54 AHMAD			HD 283	[Signature]
55 [Name]				[Signature]
56 SAMIR				[Signature]
57 EOLAKVIC				[Signature]
58 AMJAD			PD 277	[Signature]
59 FREHAZ			HD 101	[Signature]
60 I. COBAL			HD 171	[Signature]
61 KAHAN			HD 685	[Signature]
62 [Name]			HD 215	[Signature]
63 AYAZ AHMAD			HD 196	[Signature]
64 [Name]			HD 321	[Signature]
65 SIZED GILAND			PD 119	[Signature]
66 FAZAL			HD 310	[Signature]
67 HUSAIN			HD 27	[Signature]
68 Shabid Ismail			HD 137	[Signature]
69 ASHRAF KHAN			HD 182	[Signature]
70 L. EVANS				[Signature]
71 ZAFAR				[Signature]
72 [Name]				[Signature]
73 AMRULLA KHAN			HD 61	[Signature]

(20)

**Petition against proposal vehicle age limit
Hackney Carriage Taxi Drivers Association**

Name	Address	Email	Badge No	Signature
70 Farwa Shaha			PD 24	[Signature]
71 [Name]			HD 160	[Signature]
72 WAKOOS MURZA			PD 317	[Signature]
73 MY HAMID			PD 69	[Signature]
74 [Name]				[Signature]
75 SAMEZ ALI			PD 287	[Signature]
76 IM SHAHID			HD 110	[Signature]
77 [Name]				[Signature]
78 RAJA ZAFAR			HD 332	[Signature]
79 MUSSAIN			PD 63	[Signature]
80 [Name]			PD 157	[Signature]
81 NIMIL JAMES			PD 155	[Signature]
82 ANDREW MULLS			HD 14 & HD 1005	[Signature]
83 SAJID AHMED				[Signature]
84 [Name]				[Signature]
85 [Name]				[Signature]
86 [Name]				[Signature]
87 [Name]				[Signature]
88 [Name]				[Signature]
89 [Name]				[Signature]
90 [Name]				[Signature]
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97 [Name]				[Signature]
98 [Name]				[Signature]
99 [Name]				[Signature]
100 [Name]				[Signature]

(10)

**Petition against proposal vehicle age limit
Hackney Carriage Taxi Drivers Association**

Name	Address	Email	Badge No	Signature
1. A. MAHMOUD			142	
2. A. MAMMAD			110	
3. RATA SHAKI			HD	
4. O. COOKE			HD 120	
5. H. BASHIR			PH 140	
6. M. D. KHAN			HD 202	
7. Foad SHAH			HD 178	
8. MIKE DUM			HD 171	
9. MAHSAAN			0228	
10. SHAHATAI			HD 230	
11. A. GEORGE			PD 033	
12. INTIAZ KHAN			HD 112	
13. M. BASHIR			HD 100	
14. Q. ALI			PD 358	
15. D. AHMED			PD 312	
16. S. MIAN			262	
17. S. KHUSS			PH 154	
18. R. N. JIBAL			PH 120	
19. A. KHAN			PH 202	
20.			218	
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22.				
23.				

**Petition against proposal vehicle age limit
Hackney Carriage Taxi Drivers Association**

Name	Address	Email	Badge No	Signature
1. MOHAMMAD ISLAM			HD 358	
2. T. MAMMAD			HD 136	
3. KAMAL MAHOOD			HD 042	
4. SHEHAR RAHMAN			HD 209	
5. KAMAL KISHAN			176	
6. ANWAR ALI			206	
7. MAMMAD BASHIR			167	
8. YOUSUF ALI			353	
9. TOM CLARKE			188	
10. SADIQ KUN			185	
11. SAIED			202	
12. REVAZ KHAN			290	
13. ABID FRAZ			M 169	
14. M. IMRAN ALI			365	
15. SHARID			333	
16. GHAZALANFOR			336	
17. Shaheed Ismael			310 HD	
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**Petition against proposal vehicle age limit
Hackney Carriage Taxi Drivers Association**

Name	Address	Email / Tel	Badge NO	Signature
1. MOHAMMAD KAMAL			HD 311	
2. FAIZAN FRANZ			HD 041	
3. MUHAMMAD			HD 368	
4. ANIS			245	
5. ANPU VISHWANATHAN			054	
6. KHALED AHMED Ahmed			198	
7. MOHAMMAD Said			354	
8. MOHAMMAD KHALIL			007	
9. MOHAMMAD RAHMAN			105	
10. MOHAMMAD KHALIL			273	
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**Petition against proposal vehicle age limit
Hackney Carriage Taxi Drivers Association**

Name	Address	Email	Badge No	Signature
24. SHAMEEL FAZ			HD355	
25.			PD 271	
26. SHAFIQAT KHAN			271	
27. KAFIAT KHAN			186	
28.				
29. TANVIR KARIM			HD 341	
30. JAMIL KHAN			PD 313	
31. MOHAMMED A. BHATTI			PD 160	
32. T. PARZ			PD 203	
33. WAHID RAJA			19 004	
34. VADEEM A KHALIL			HD 300	
35. MOHAMMED G. A. B.			PD 153	
36. MOHAMMED KHALIL			HD 147	
37. ZAFAR I. QADAR			HD 182	
38. MOHAMMED KHALIL			PD 153	
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**Petition against proposal vehicle age limit
Hackney Carriage Taxi Drivers Association**

Name	Address	Email	Badge No	Signature
1. Kabeel Khan			HD 104	[Signature]
2. [Name]			[Signature]	
3. [Name]			[Signature]	
4. CAROL NICKSON			[Signature]	
5. Ghulam Mustafa			[Signature]	
6. [Name]			[Signature]	
7. Steve Burgess			PD 121	[Signature]
8. [Name]			[Signature]	
9. [Name]			[Signature]	
10. IAN BIRCH			PD 224	[Signature]
11. Barry Ab.			PD 222	[Signature]
12. [Name]			[Signature]	
13. [Name]			[Signature]	
14. S. Ansari			266	[Signature]
15. [Name]			[Signature]	
16. ABDUL RAHMAN			1591	[Signature]
17. IAN RANSOME			[Signature]	
18. SPENCER KHAN			HD366	[Signature]
19. N. AZHAR			M HD 158	[Signature]
20. HUNTER			LH	[Signature]
21. A. KRAMS			HD103	[Signature]
22. S. AKRAM			[Signature]	
23. [Name]			[Signature]	

**Petition against proposal vehicle age limit
Hackney Carriage Taxi Drivers Association**

Name	Address	Email	Badge No	Signature
1. M. Shabazz			103	[Signature]
2. A Khan			106	[Signature]
3. [Name]			[Signature]	
4. [Name]			[Signature]	
5. [Name]			[Signature]	
6. [Name]			[Signature]	
7. [Name]			[Signature]	
8. [Name]			[Signature]	
9. [Name]			[Signature]	
10. [Name]			[Signature]	
11. [Name]			[Signature]	
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15. [Name]			[Signature]	
16. [Name]			[Signature]	
17. [Name]			[Signature]	
18. [Name]			[Signature]	
19. [Name]			[Signature]	
20. [Name]			[Signature]	
21. [Name]			[Signature]	
22. [Name]			[Signature]	
23. [Name]			[Signature]	

**Petition against proposal vehicle age limit
Hackney Carriage Taxi Drivers Association**

Name	Address	Email	Badge No	Signature
1. M. BYANE	[Redacted]	[Redacted]	173	[Signature]
2. K. FARUK			176	[Signature]
3. YOUSUF AH			353	[Signature]
4. N. SHARIF			103	[Signature]
5. S. AYUB			219	[Signature]
6. B. KHAN			017	[Signature]
7. S. RAHMAN			165	[Signature]
8. A. KHAN			206	[Signature]
9. S. DURRANI			362	[Signature]
10. A. ALI			306	[Signature]
11. M. ILYAS			285	[Signature]
12. M. AWES			1074	[Signature]
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**Petition against proposal vehicle age limit
Hackney Carriage Taxi Drivers Association**

Name	Address	Email	Badge No	Signature
1. MUHAMMAD NEMAN	[Redacted]	[Redacted]	025	[Signature]
2. Muhammad SAKIB			PD 155	[Signature]
3. AHMAD MAHMOOD			PD 004	[Signature]
4. Yaqiz Khan			PD172	[Signature]
5. MIRZA RASUL			HD123	[Signature]
6. MOHAMMAD ADEES			K HD300	[Signature]
7. SAEEDANI				[Signature]
8. Kamran Hossain			HD352	[Signature]
9. USMAN MUZZA			HD133	[Signature]
10. M. SHAFIQUE			HD320	[Signature]
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ANNEX D

Individual consultation responses

I am just writing to say that I agree on the golden plates, but could you move the age limit up to 10 years please, because the Country is in crisis and we are not able to afford a new car ever 7 years. Plus there is not much work out there either so how could we possibly afford to buy a new car every 7 years?

I would like to register my objection to the proposed changes regarding the age of the taxi vehicle. This would place unnecessary financial burden on taxi drivers; who are already struggling financially. With limited night club business demand in Hemel, as well as accelerated car y depreciation of newer cars, this change is unwelcome for ALL Taxi drivers. I appeal to the committee for help in this

As all vehicles are all subject to the MOT and compliance test there appears to be no justification to imply the vehicle is unroadworthy based on its age. My vehicle is a "57" plate and if this change goes ahead I will have to change my vehicle next year. It was purchased eighteen months ago with 3,800 miles on the clock as it was a fleet car held in bankrupt stock. It now has 40,000 miles on the clock. I cannot understand how this is justifiable to enforce a vehicle change.

If a vehicle is properly maintained, it will be safe and reliable. It would not be in any taxi/private hire driver's interest to retain a vehicle that is unsafe or prone to breakdown as this would have a detrimental effect on his earnings and his life.

Many vehicles are older than this and are executive type vehicles. To impose this change would enforce drivers to purchase vehicles at the lower range of the spectrum and this would lower standards, not raise them.

I think this idea is absolutely ridiculous and disgraceful. This will only decrease our income and put another pressure on our financial situation. I think it's perfectly acceptable to have neat and clean vehicle without any age limit especially in this current situation where everything is going up and we are having to put many many extra hours to make up for it.

I recently received a email from you suggesting a amendment to HC vehicle age limit I strongly object to this and many of drivers who work in this trade feel the same and as committee member this matter should have been discussed first before presented front of licence committee and to be fair to all the HC age limit should been same between 8 to 10 years plus at this present claimant where the industry is struggling to provide sufficient salary for there families

I like to register my objection to car age limit because our industrial and night club life for taxi demand is very low I suggest the people who related to make law should have ground knowledge before making any changes thanks

Licensing department going to bring taxis age limited free disable plate and golden plate. I am not satisfaction that you are going to make a new rule for the age limited for the taxis. because I bought my brand new van by finance in 2008 and I got a free plate at same time then after four year (2012) licensing department needed to M1 certificate for that van which i have so I spend another £4080.00 to convert wheelchair accessible taxis(attach both receipt) when you issue the first time free disable plate car age less than 5 years that is acceptable, but you have to allow the free disable plate and golden plate stay in the car/van at

least for 10 years old. That's why i bought new car so i can use my car at least for ten years. If you do changes I am going to lose my plate and I can't afford to buy a new vehicle because poor financial situation in my family and less work. I can't work long hours if you make this rule I will lose my work. If you want to make this rule i can't offered to buy new vehicle so I looking from you a taxi grant buy a new vehicle.

I am opposing to limit the car age because it cause a lot for the drivers. Causes will be-

- 1) Making someone as a unemployed.
- 2) Some one cannot get the personel loan to buy new car of that age.
- 3) Some one cannot earn more money by new car.
- 4) Every one struggling to earn normal money.
- 5) Have to pay more money for insurance company.
- 6) All drivers are getting abuse because of one way in the high street.
- 7) Day by day less customer because of reessionion.
- 8) As long as car got MOT driver should drive that car.
- 9) By limiting we shall not get award from the public or more money.

I hope authority will consider those fact and cancel the proposal. Thank you.

I am writing with regards to the suggestion being put forward to the licencing committee on 27th August about the vehicle age limit, as I understand it is not a recommendation made by licencing department but merely a suggestion by a few drivers. After speaking to the majority of drivers in the trade they are all opposing this suggestion based on the points highlighted;

- Due to the economic downturn the trade has already suffered approximately 40% downturn
- Due to the regeneration of the town and displacement of the taxi rank the trade is likely to suffer further decline
- The new bus routes are also have a impact on the trade
- High fuel prices and insurance is already taking a toll

You cannot compare Hemel with other towns who have a lot of trade i.e Universities,Nightclubs,Museums, Large Shopping Centers,Hospitals which generate a lot of taxi trade unfortunately we are missing half of the above attractions.

A few individuals have brought new cars and are suggesting to put an age limit on the vehicles, economically this is not a good time to be putting this proposal forward as it will force a lot of people out of business becoming dependent on government handouts, which I can guarantee the government or the people in the trade want. Maybe this should be delayed until the rank issue has been settled and then possibly a ten year limit should be more reasonable to start with.

I am looking at the whole trade rather than self interest of a few individuals. I request the department and the committee to carefully consider the points mentioned above before making any further recommendations.

poor situation of work, extended bus service, regeneration of town we will lose work and will not be able to afford new cars. Can you please extend the golden plates for ten years and disable free 5 years. i will be thankful to you.

I would be against a 5 year old car limit as I feel this would unfairly penalise drivers like myself who run an older car to an extremely high standard.

In relation to the changing of vehicle licences to seven years for golden plates and 5 years for Disabled , We object as following;

- In a recession where such a rule will make continuing or starting new increasingly difficult economically.
- Hackney rank being moved from the town centre to be replaced by new bus terminal which will see the use of taxis decrease and thus having to buy new vehicles seems pointless.
- No survey amongst drivers carried out
- The trade has seen an active decline in business and implementing such a policy will clearly be detrimental as we are not making enough money to now start replacing vehicles with newer ones.
- To see a drivers suitability a medical is required to be able to be licensed, in the same way an M.O.T is conducted by a reputable local garage where extra stringent tests are in place. Why is this not deemed sufficient.
- Newer vehicles with more computerised systems are proving to be problematic with many newer models costing more than their older counterparts. A typical example is a VW Passat or a Toyota Avensis which many drivers in the borough have.

In summary it is not cost effective to implement such changes, a town which has no major club a college which is not fully operational and RANK BEING MOVED FROM THE TOWN. You are now expecting us to fork out on more money for cars not to mention the already increased yearly licence fee,

Thank you for your letter dated 30th august 2013. I read your letter with great interest and i am pleased to say that there are a lot of points which i agree with but as far as the VEHICLE STANDARD is concerned i totally disagree with because as a hackney driver with a eleven years old car and no finance on it i am struggling to make a living out of it. Only two days ago i paid £240 for an Mot test which is £40 more than last year and you are planning to have mots twice a year,plus you have put up other fees too. As u probably know the work situation, it is dire as there are too many taxi to share the work. For me to buy a five years old car i will have to take out a finance which will b extra burden on my already streached budget. While i appreciate you are trying to modernize the fleet but please also consider the daily struggle of a taxi driver who is trying to earn a decent wage for himself. For me a ten year age limit would me more aporopiate. Thank u for your time and i hope you will give my point a serious thought.
ps. please also keep MOT to once a year.

I opose to new rules stating 5years for saloons and estates mpv reason for it is not possible there is just not enough

I feel that instead of being 7 years age policy it should be higher, already we have a lot if taxi driver and its very competitive. They are many of us that feel the same some changes do need to made so its fair for every person, as at the moment the effort some people put in its not reflecting on there earnings because of unfair treatment!

I have thoroughly looked through the proposed changes to taxi licensing and I would have to comprehensively dispute the change regarding the age of vehicles when first licensed.This if for two main reasons;
1- Rather then judging cars on age I think it would be more appropriate to judge them on their condition as cars of an older age can be in just as good condition as newer ones.
2- We are currently going through a very difficult financial situation and business in town is very slow. Because of this our incomes have significantly dropped over the past few years, this means it very difficult if not impossible for all taxi drivers to afford newer cars.
I have no problems with any of the other proposed changes.

I am writing regarding the current proposal to implement rules which would mean that only must not be over the age of 7 years, I strongly disagree with this for a number of reasons. Firstly it is not possible for people to buy new cars because the rules change and then to keep updating to stay within the specified time scale.

Secondly financially it is not affordable for me to buy a new car, taking into account the number of drivers you have allowed into the Borough to take up employment as taxi drivers I am only earning enough to pay my household bills. I do not have any dispensable income to put towards a new car.

If the vehicle is safe and in working condition I do not see the reason why it needs to be updated. We pay for the council to check whether the car is fit for purpose, and if it is deemed to be why is it necessary to make life more difficult and impose more unnecessary rules.

Work is already down in the borough and to have to start saving towards a new car, which will be a lengthy process, it means individuals will have even less than they currently do. The process of saving for a new car would take such a long time, taking into consideration individual circumstances, it would mean some people would not be able to work when the new rules come in, meaning higher unemployment and more people on benefits with a final result of more burden on society and the government.

I therefore do not agree with the proposals and will strongly challenge them every step of the way.

I would like to state that I welcome the consultation as a part of your ongoing project to modernise the licensing procedure. However I am very concerned about the planned introduction of a minimum age for the vehicle. In the current financial climate it would be very difficult for the majority, myself included, to change our vehicle to one which is a minimum of 5 year old. We simply would not be able to afford this change.

Less and less people are using a taxi to navigate around our town thus making it very difficult for the present taxi drivers to sustain a living with any disposable income. Myself and my colleagues work the maximum hours possible just to ensure that we are able to 1) provide for our families and 2) make sure all expenses are covered from our earnings. I would also like to point out that I am the sole breadwinner in the family.

If the changes to the minimum age of the vehicle go ahead then I would be left with no choice but to no longer pursue my career as a taxi driver, a career in which I take great pride in providing a service to my local community. I will be left with no choice but to declare myself unemployed and thus be a burden on society and claim benefits.

In my entire working life I have never been in a position where I thought it is financially beneficial for me to not work and claim benefits rather than try and provide for my family through hard work and perseverance.

Also I do believe if my vehicle is road worthy and meets the MOT road safety and environmental standards then there is no need for a vehicle to be of a minimum age.

We as taxi drivers can not afford to have a vehicle which is a minimum of 5 years old, in a town which is struggling to attract any business during the day or any nightlife entertainment, and still be expected to provide for our families.

I urge you not to go ahead with this change as it will have a major negative impact on many lives. The lives of those taxi drivers who are working hard in providing great service to their local community.

I would like the chance to put a suggestion to the community.

I am of the opinion that it may be a far better to ensure that the safety and standards of Dacorum licensed taxi and private hire cars is maintained without introducing an age limit on replacement vehicles or new licences, this would be by implementing the existing compliance test by way of vetting out unsuitable vehicles but this would mean an enforcement officer inspecting the vehicles before it was accepted for licensing.

I was of the opinion that this's is how things where done before the compliance testing was out sourced to a garage.

I feel this is where the standers have slipped. iE visual presentation and hygiene wear and tear of the trim .

In our neighbouring towns they have age limits on there fleet of taxi and a worrying pattern has develop.

drivers are keeping there cars as long as they can continue to pass the test this is resulted in cars upwards of 15 yeas old this is no different to our fleet now so I feel it would make sense to implement the existing compliances test as it was intended thus maintaining safety standards with out the added expense of age limits

in London there are no such age Limits as they use the compliance test to filter out unsuitable vehicle at any stage of its taxi life

And amendment to the compliance would be far simpler way of increasing public safety and standards

From reading the letter, I personally do not agree with the age limit of the vehicle as I believe if the vehicle is in good working condition and is well maintained there should be no need to change the vehicle.

Furthermore, another issue that is becoming more noticeable it that there is a decrease in business within the area. Therefore, it ties in with my previous point, if there is not enough business it would be difficult to upgrade the vehicle every 4-5 years.

With regard to the starting age policy I strongly oppose the proposal due to the fact that when my customers get into my car they never complain about the age of the car and I have no doubt that as long as the car is road worthy, the cab is on time and that drivers provide a good service that, that Is what the customers are concerned about.

I have been a Taxi Driver for 11 years and in that time I have owned both new cars and older cars and it does not make no difference to the customer what the age of the car is/was and as we have a strict MOT, if the car passes the MOT, it means the car has passed a high standard of testing, beyond the normal test that a normal MOT would be.

The local Association representatives have informed me that one of the reasons for the age proposals is because neighbouring towns have an age policy but I would like to point out that they are much busier towns in terms business as they have bigger and busier train stations such as Watford \Junction, more pubs and nightclubs/bars in their town centres than what Hemel Hempstead/Dacorum has, so they on paper should be getting more business. That is why drivers in neighbouring towns might be able to afford to buy cars with an age limit but even then I doubt they find it that easy, as the job regardless of where you work has lots of overheads and drivers are left with very little profit.

I think that if the age limit goes through it will backfire in the sense that drivers are likely to re license their car for much longer than they would at the moment. I can forsee them changing the engine of the car when necessary in order to try and get round having to buy a car under 5 years old and they will carry on using their cars for as long as they can where at the moment drivers tend to change their cars every few years in my experience.

In my experience, a significant amount of the public do not treat our cars with respect and they cause a lot of mess, often deliberately I feel, such as spilling drinks over the car seats, eating take aways in the cars and sometimes there are things that they do that is a lot worse than that which I will not specifically mention.

With regard to any changes in the compliance test, I would oppose that too as I feel the current compliance test is hard enough as it is and tests our cars beyond a normal MOT.

I am writing to oppose the new proposal put forward by the licensing department to bring into force vehicle age limit. I strongly disagree with this proposal, i feel that this is not economically the right time to bring the proposal into action. The reason being, the displacement of the taxi rank in town will have a huge affect on trade.

The recent increase in MOT fees of 40% and the driver badge fees up by 50% has already affected the trade.

There is a comparison being drawn by the licensing department with Luton and Watford, i would like to highlight that you cannot draw comparisons with these towns. For instance, Luton has an airport, university, nightclubs, hospital, large shopping centre, football ground and the population is 3 times in excess of Hemel Hempstead. As a result, it is clearly apparent Luton has more trade due to the vast amenities listed above. Similarly, Watford have far superior trade due to the football stadium, nightclubs, hospital, major train station and popular shopping centre.

The drivers have to work 10 hours a day and on a good day they are lucky to earn approximately £60 a day. I would like to request the committee to give this proposal careful consideration as this will have an huge effect on the drivers and could possibly force a lot of them out of work. also, i would like to highlight that London being the capital city does not have such an age limit restriction in place for the taxi's. I feel that a visual inspection to check the condition of the vehicle should be reintroduced by the department at the time of the vehicle license renewal, where the vehicle should be checked for visual defects by the licensing department.

What would happen to vehicles that are plated and the plate needs to be transferred for a short period to another vehicle and the time limit has passed when the original vehicle needs to be replated?

e.g Golden plate X plated at 4.5 years, mechanical breakdown or paint damage sustained 18 months later. Awaiting parts or a respray so a cover vehicle is plated using golden plate X. Driver wants to return to original vehicle after repair but if new ruling comes in will not be allowed as vehicle would be 6+ years. Does this mean driver would be A) forced to buy a new vehicle or B) not be able to transfer plate and would be forced into a wheel chair accessible vehicle for the duration or C) would be prevented from working until the vehicle is back on the road.

Drivers are continually using cover cars on a temporary basis and I would appreciate your comments on any exceptions you may have in mind for situations like this or how to justify the imposition.

I am writing to you concerning the age limit on taxi vehicles. I strongly disagree with this idea for many reasons.

Firstly the economy is in a bad situation which results in higher costs for example insurance costs are high, MOT costs are high and Road Tax costs are high. The household costs are increasing but revenue is decreasing

Secondly the majority of taxi drivers will not be able to afford new cars as their financial situation is not good, which will result in taxi drivers losing their jobs.

The main reasons why I object to the maximum starting age proposal is because this will be unaffordable for many drivers including myself and we do not get enough work to be able to afford the cost of this proposal. The only way I can see myself being able to meet this proposal if it was implemented, was if I took out finance which is a very risky thing to do. It is stated in the proposals that it is reasonable to expect drivers to make significant investment in the vehicles they license and I would like to point out that we already do and I think a major point has been overlooked or the current staff at licensing may not be aware of the point I am about to point out at all.

Since the mid 1990's, many owners of Hackney Carriages have had to buy and pay thousands of pounds just to get hold of a Hackney Carriage plate/business in the first place, were up until the mid 1990's, drivers used to get a Hackney carriage plate as part of the license fee. This is the key point I was referring to.

When Dacorum Borough Council stopped issuing Hackney Carriage plates by and large in the mid 1990's, they created a waiting list for applicants to get a Hackney Carriage plate as part of the licensing fees and what happened was that many drivers who already had been issued with a Hackney Carriage Plate from the council, either put their name down on the waiting list for a second or more plate (!) or they got their relatives to put their names down and one way or the other were able to sell those plates as part of a business to new drivers for thousands of pounds!

I always thought should never have been allowed to have happened but it did, so drivers will have the cost of paying around 4-6 thousand on average to be able to get hold of a Hackney carriage business before they have to pay all the other costs involved in trying to license a vehicle as a Hackney Carriage.

If new applicants opt to buy a wheelchair accessible vehicle instead, which if they pass the licensing process could then get them a plate from the council that way only, then my response is, those vehicles do not come cheap either.

Another reason why I am opposing the maximum starting age is because it is implied in the proposals that drivers are able to pass the MOT by buying an older car for just a few hundred pounds and I know from direct experience that even when buying older cars, the total costs of getting the car through the licensing process as a whole, runs into thousands of pounds.

There are various licensing costs, insurance costs, the costs of buying meters which most drivers/cars have even those who are Private Hire drivers often have the meters in, as most cab companies follow the council rates of fares.

There is also the cost of meeting the compliance test requirements which means that the cars may need to be part re-sprayed if the car falls foul on the rules regarding scratches on the bodywork and things like that.

With regard to the point in the proposals that newer cars have much better technology and safety standards, it is not mentioned what they are exactly. Most cars since the late 90's have Anti Locking Brakes, Air Bags for both the driver and front passenger and as for satellite navigation systems, many drivers will either have their own sat nav or it will be part of the booking system device they have in their cars if they work for big cab companies like Choice and Millennium. I know that Rainbow also have an inbuilt sat nav system with their booking device inside drivers cars.

As for the point about newer cars emit lower carbon emissions, I have to ask, how much bad emissions are existing cars adding to the atmosphere? If the council isn't already, shouldn't they be targeting buses who do release in my view and experience far too much dodgy emissions and always have.

I gave some examples as to the risk drivers will be taking if these proposals are accepted if they take out finance on newer cars in order to try and stay in the job such as if a driver is in a non fault accident. If a drivers car is written off in a non fault accident, it could well be the case that the insurance company will not pay out the full value of the car and if that happens, not only will the driver have to pay the full finance with all the interest still but they could well be unable to afford to try and get another car on the road. I can also see the scenario where it could lead to a driver defaulting on payments in this kind of situation and then possible bankruptcy?

The Licensing Department may think that if drivers choose to get out of this business and go into unemployment, that they won't be missed as there are a lot of taxis/private hires these days but I would caution against this too for the following reasons:

First of all, it is because there is so many drivers who work in Hemel Hempstead especially that the public can get taxis/private hires on the whole very quickly. If there is a drop in the amount of drivers, then I know the public will not like having to wait longer to get a taxi/private hire.

Up until around 2003, there was still a lot of drivers then, but it was often the case that the public had to wait anywhere up to an hour or more for a Taxi/Private Hire depending on the time, demand and whether or not they had pre-booked or not. Even when customers had pre-booked, a lot of the time, companies would run late on their bookings as customers often

change their destination, or want to drop off a friend that they didn't mention to the company when booking and or want to go to petrol stations/off licenses to buy things like cigarettes and alcohol.

I also remember there used to be long queues for Taxi's in many public places during periods of high demand and at weekends this sometimes used to lead to fights breaking out at Taxi Ranks as well as Drivers being threatened and or attacked if they couldn't meet someone's demand to pick them up. If drivers are forced out of the job as a result of these changes being accepted, It could lead to a return of these horrible situations.

I also wanted to point out another concern I have with regard to taking out finance and how it could go wrong. In this job, drivers unfortunately do get a lot of abuse, threats in general in various ways and scenarios too. I genuinely believe that many of the people that treat us in this way do so "because they can", mainly that because we have a license that they can put in a vindictive complaint in about us if we object in anyway to the way we are being treated.

If a vindictive complaint is put in, there is no guarantee that things will go in the drivers favour if they have done nothing wrong, and those that hint at putting in a complaint motivated out of vindictiveness/spite I believe realise that it will be no skin off their nose if their complaint is not upheld and in any case they sure put drivers through a lot of stress and worry because like I said there is no guarantee what the outcome will be.

If a driver takes out a finance deal and a vindictive complaint is upheld and a driver loses his/her license, this will be complete and utter disaster for the driver in general including the possibility of facing financial ruin.

Going back to a point I made earlier about how some drivers got their Hackney Plates as part of the licensing fees and other drivers since the mid 90's have had to pay thousands to get a plate/business, I would also like to add that older drivers who have been driving for a long time since the 80's or earlier may have also benefited from much cheaper housing costs where the cost of buying/renting a home since the late 90's has rocketed and I think this also needs to be considered before this decision is made to accept the proposal for a maximum starting age for vehicles.

If the proposals on the maximum starting age are accepted, I really cannot see how it is going to be financially viable for anyone to be a Taxi Driver in the first place. It is a job that has so many overheads that drivers struggle to earn enough to live on in general and I think trying to recuperate "start up costs" as well as the cost that these proposals will incur will be impossible and as people go to work to earn money, the obvious point drivers and the council need to consider is why would anyone want to be a driver in future if these proposals go through as they will be earning next to nothing.

Moving onto my objection to vehicles having to be dent free. I am not sure if this is a exact proposal or not but it sounds like it is. I object as there is already existing policies on dents, scratches and rust to cars and on dents and scratches there is a little wriggle room for drivers on this but if it is being proposed that cars have to be totally dent free or scratch free that will be very unfair and I think petty.

Small dents have happened to most of the cars I have owned but none of it was my fault. They normally seem to occur in a car park, car park spaces when other vehicles park their car facing outwards and they hit their car doors onto parts of my car(s) not protected by a side impact bar and I've noticed that a lot of newer cars these days do not have side impact bars at all for some reason too so they could well incur small dents this way too.

On scratches, I would like to point out that drivers do not go round scratching their own vehicles, either cars are like that when first bought or our cars get vandalised and I have had that happen to me a lot over the years. For drivers to be penalised further for things that are beyond their control and not their fault is totally unfair so I request that any further changes on dents/scratches are not approved, it will lead to further costs as well if they are accepted.

That concludes my objections and opposition to the above mentioned proposals.

I am struggling to under stand the council proposed policy on hackney carriage age restriction and could you please explain the logic behind it

As I see it I could buy a brand new mondeo do average taxi mileage of 50000 and after 5 years have a car that has done 250000 miles and is taxi compliant

Or buy a 6 year old mondeo full service history one owner 35000 miles which would be non compliant

All so if I brought a new car and done 3 months driving 12000 miles and was not the sort not to check car daily portntially then running on illegal tyres that would also not alter this Surely the answer is a more strictly enforced compliance check this would be fairer on all driver and more importantly safer for fare paying passenger

As someone that's been in this trade for a long time you can have my feedback.

It would be nice to put new cars or ones of just a few years old, but because you the Council have been putting more & more taxis and private hires on the road, we are bearily making a living. And for drivers that have been doing this for a long time can not aford to pay that sort of money out.

When I started there where 60 taxis 100 private hire in Dacorum. How many now? 300 taxis 500 private hire.

And at no time has Licensing stoppedputting more & more taxis on the road. What did you do a few years ago, you ca have a taxi plate if you have wheelchair accessible and most of them couldn't take a wheelchair or get them into one unless the person got out the wheelchair.

So its not a good idea to change the policy for cars to be under 5 years, unless you take about 300 cars off the road, starting with last in first out. We need to earn money to pay out.

Another thing about new cars or 5 years old is DPF. Cars with DPF don't like lots of short jobs, they block up soot then don't go, so with are earning who can aford a newer car.

Summary of age policies adopted by nearby authorities

Council	HC limit policy	Max age on first licensing	Max age before de-licensing	Other age policies
Dacorum (current)	-	-	-	-
Dacorum (proposed)	-	-	-	6m tests @ 10 yrs
Aylesbury Vale	50 (Aylesbury only, unlimited in rural)	4 years	8 years	6m tests @ 6 yrs
Central Beds	-	5 years	Non-WAV HC / novelty PH: 10 years Standard PH or WAV: no limit	6m tests @ 5 yrs
Chiltern	-	4 years	10 years	6m tests @ 6 yrs
Luton	167	5 years No older than current vehicle if replacing	-	6m tests regardless of age
St Albans	-	5 years	-	6m tests @ 5 yrs 4m tests @ 7yrs
Three Rivers	-	HC: 10 years PH: no limit	-	-
Watford	304, reducing	4 years	Purpose-built taxi: 20 years Other: 13 years	-