

TAXI AND PRIVATE HIRE POLICY CONSULTATION RESPONSES

2020 Consultation Responses

1. Age policy is a little bit harsh, going back to the old system of 4 years first license then upto 10 would be much fairer.

Also maybe consider HPI checks for vehicle and calibration certificates for meters.

2. Window tinting has caused a few issues. All other surrounding borough allow factory privacy tints. What is the benefit of having non privacy tints most modern vehicles comes with factory tints which is legal.

I think written off vehicles cat n is safe as it's not structural damage. Also the vehicle has an inspection to deem it safe.

Most vehicles from 2013 onwards are compatible with the ulez.

3. I have a complain about the current taxis licenses which the council are issuing it's one to many taxi drivers in farnham. I think it's about time the council should limit the taxi licences. If one of your guys come and have look out side slugs and lattice how may drivers picking illegally plus castle street only 4 or 5 parking spaces you will see around 20 plus cars parking and blocking the road . Also the station taxi rank has only 8 parking spaces. But station also to blame they have issued 40 plus permits in the station if want give visit in the weekend or in the week days you are welcome. What I want to say give permit to only private hire only and stop issuing hackney carriage licence out. That's my opinion and to add one more thing is to many drivers from other boroughs, I also think you should issues licence to people who live withen the waverley borough . And most importantly most cars are to old you should get a limit on how old the car should be.

4. (a) I feel that I need to address the matter of the door signs. As you are aware, my work is almost exclusively tour work via an agency and, as with the plate and tinted windows policy, it would make my life difficult, if not impossible were a waiver / exemption policy not included within the main policy. I spoke to the agency today and they confirmed that I would not receive work were my vehicle to be adorned with the proposed door stickers.

As I said, I will attend the meeting on the 12th and I would add that I do understand the theory behind the policy amendment but unless an exemption can be applied for, it would mean that I would loose my "sole" income stream.

- (b) Further to the meeting, which I found very useful, I thought I would write and try and address the concern expressed by many regarding the age of cars when registered and the need to have cars of less than a given age – I believe 7 is the proposed maximum age.

Most drivers, myself included do not buy new cars, the norm would appear to be 3-4 years. You can obtain an excellent vehicle at a good price and expect 5 years finance to be obtainable.

From the attached I think that in Calculations 1 you will see that if the proposed age limits are made official then my car (2016) would be required to be replaced in 2023 when having purchased it is 2020 I would hope that it would be paid for by 2025.

That option is shown in Calculations 2 and that would see my car – as an example – registered in 2016, registered for private hire in 2020 and available for use until 2025. When the finance is complete.

A compromise might be to give a 9 year maximum for cars registered with Waverley in 2020 and from Jan 1st 2021 a new policy adopted. For example, a car newly registered in 2018 could be registered with Waverley in 2021 and available for use – under the 7 year rule – until 2025. That would make a 4 year finance deal necessary but if an 8 year old maximum age was applied then a 5 year finance – the preferred option – would be available.

The third option would also allow you to give all drivers of cars registered with the DVLA prior to 2015 a few years to look for a replacement.

I hope all this makes sense. Should you wish to discuss it further please contact me.

On another matter

Might I also suggest that you make drivers aware that the Medical Forms have changed. I went to my doctor, having waited 3 weeks for an appointment, for her to then tell me that the eyesight “part” needs to be done by someone else! This I have now arranged but at an additional cost. It would have been preferable to have been reminded that the forms had changed and that I should ensure my medical practitioner might not be able to complete the form. I should have everything ready for the end of this week and will arrange to come in and get everything done.

5. •Window tinting policy amendments (page 23 para, 25 page 39 para 13 & page 43 para13) The chauffeur industry throughout the UK and indeed worldwide has 2 requirements unmarked vehicles and factory tint on the rear windows. I cannot believe that Waverley Borough Council fails to recognise the importance of these requirements both for safety and privacy. Should you not allow us to continue then you will leave us no option than to move our business to Hart or Surrey Heath. I am hoping that it will not come to this and we can move on. One suggestion I would like to make is maybe to charge a fee for exemption which we would be happy to pay or have a Chauffeur Licence which has the package of Plate and Privacy glass written into it. Making a blanket decision across the Taxi and Private Hire industry is incorrect. Lets be clear this is Mercedes-Benz factory tint not LIMO tint or Tint Film.
6. (a) I would first ask why the suggested change of policy, management of the condition of vehicles is already managed through testing on a six monthly basis and surely the condition and mechanical condition is more important than the age of any vehicle. I would suggest that a vehicle of under two years of age could have in fact covered more miles than an older vehicle. The age restriction in my mind only means that a large proportion of vehicles currently registered will have to be replaced and will, I feel have a huge adverse effect on the ability for a large numbers of drivers to trade.

Secondly two dates are quoted for the sole use of low emission vehicles 1/1/2023 and then 1/1/2030 which one is correct. Can I suggest that a better policy would be that all vehicles need to be low emission vehicles as of the 01/01/2030, this would allow all current vehicles currently in use to be naturally replaced with appropriate vehicles within a more appropriate time. I think the current policy of no age limit would allow also for all vehicles to be replaced in future with low emission vehicles.

- (b) Good morning having given this matter further thought, can I firstly ask if these amendments or whatever amendments are made to council policy are enforced when will be the next review date be. I need this information to try and future proof my business in essence if the age requirement is enforced which I strongly disagree with, this will lead to me having to replace both of my vehicles in the next 2 years. Has consideration been given to enforcing a totally green fleet of electric taxis to be enforced by 2030. I believe such a policy would allow all businesses to adapt their fleet over the next ten years and for the council to promote a green policy and to provide appropriate charging points. I strongly challenge the differing policy in relation to age of vehicles as this is in essence a change from initially 10 years old to no age limit then a reversal which is even more constricting.
- (c) Can I please raise an issue in line with the forthcoming suggested policy change, could it be considered that in line with the latest government policy on vehicle usage that Waverley leaves the present policy in force and a target date be set of 2030 for all taxis to be electric 5 years in advance of the government policy. This would allow natural wastage of all present taxis and the installation of charging points at the ranks across Waverley. This I believe will have a two fold effect of allowing a small revenue for the council for sale of electricity at such units and encourage a greener fleet.
- (d) Final suggestion for inclusion on the debate which I believe would keep all of the drivers happy, so here goes, give all present taxis registered grandfather rights to be operated under the present provisions as in no age limit etc, but with immediate effect for the new age limits to come into force. Therefore the wish to restrict older cars coming to the trade would be effective immediately. In order to control the possible ageing fleet to introduce a condition that the vehicle is kept to a certain standard with an appeal process in force as this would be obviously subjective. With this stance also a policy as previously suggested an overall policy of projected all electric vehicles by 2030. I believe that the life of a working taxi, notwithstanding it's previous history is only about three years therefore any older cars will naturally demise within that time only extending your suggested time policy by 12 months e.g. 2023 rather than 2022.

If the policy should be adopted as suggested I believe that as of 2022 nearly all of the currently

Running taxis in Godalming would breach the 7 year age limit and therefore reduce available options for the residents of Godalming.

- (e) Having attended the meeting today I would like to put forward the following suggestions which I believe would give the benefit that the council requires and would be acceptable to current trading drivers.
1. With a view to allowing current drivers to continue to trade and plan for the future, that all currently licensed be allowed to be used in line with current policy e.g no age limit. (Grandfather rights).
 2. That the current policy with effect to inspection be adjusted, for example that all tyres should have a minimum depth above current MOT allowances and that advisory's be required to be repaired /addressed priority

to a further inspection say in one month. Failure to comply would require that the plate be revoked. This will therefore mean that older vehicles are no more economically viable and slowly reduce the older vehicles.

3. That the proposed age change e.g max 3 to 7 years comes into effect immediately ,therefore stopping the increase of older vehicles and making it harder to register in the Waverley area, this would have a two fold effect by reducing any increasing fleet and controlling future requests and hopefully increasing trade for current drivers.

I would suggest this policy would be acceptable to all at the meeting, as all other suggested changes met with very little opposition, again the main problem being the age change suggested.

7. It seems like your considerations cover the important topics but in addition to the stipulations about new tyres only to be fitted and the age of tyres, I would like to see the use of “re-treads” banned.

On the roadsides, I see retreads that have come off the vehicle, surely making the vehicle illegal and unsafe.

Also tinted glass should not be allowed (but that me already be in the document).

8. (a) I have purchased and licensed my current vehicle in June last year. I have a 14 reg Volkswagen Sharan on HP finance of 5 years period which will end on June 2014.

According to the newly drafted policy, I have to change my vehicle by the 1st of January 2023. So, can I still pay for my current vehicle finance outstanding balance and I'm pushed to go and buy a new vehicle? When I'm able to use my current vehicle. And will allow me to earn money and clear my remaining balance and I also have other daily/monthly bills to pay for?

- (b) Following our conversation today I would like to append a new comment regarding the new proposed policy and also could you please pass it on to the next committee meeting.

I do like and accept the idea of bringing in a new vehicle with a maximum of 3 years old, but I do reject the idea of keeping the vehicles only for a maximum of 7 years old in duration. This new proposed policy will affect dozens of drivers including myself. Especially if is your vehicle under HP agreement. My proposed idea which I'm aware that lots of drivers are happy with is to keep the vehicles to a maximum of 10 years old.

Thus, the perfect policy will be licensing a new vehicle to a maximum of 3 years old and last only for 10 years from the first date of registration.

9. With reference to the proposed vehicle age limit, as you should recall this was only amended in 2018 to a no age limit, what I want to know is why are you proposing to change it after only two years?

Drivers are finding it hard enough to make ends meet without worrying about having to replace their vehicle every seven years,if the testing centre does their job properly and takes cars off the road when they are not up to standard, I don't see what the problem is.

You may recall we had a petition about the age policy with over 50 signatures,as for wanting ULEVs, where is the infrastructure to support this, there are no charging

points in Farnham, are you as a Council going to provide them on Taxi ranks bearing in mind all the cars in Farnham, there are only 7 bays at any one time, 4 in Castle Street and 3 on West Street (when not occupied by private cars and vans) it's all well and good you wanting drivers to change, what incentive is there when the roads in Farnham are so bad that repairs are costing a fortune.

I hope as a Council you will see that changing the age policy will cause a lot of hardship for most of the drivers, please leave it as it is and take this as an objection to the proposed amendment.

10. Any car should be less than 2 years old for 1st plate as a taxi.

Any taxi shouldn't be as a taxi more than 8 years old.

To have a New driver license should be some more knowledge test like Rushmoor Borough and Guildford Borough does.

11. My only comments on the review are about the proposed age policy for vehicles when first offered for a licence.

Many private hire customers appreciate travelling in a prestige branded luxury vehicle. The adoption of an "under three year old, when first licensed ,policy " will preclude many drivers from buying such vehicles on grounds of non-affordability.

I don't drive a prestige vehicle myself but a " 3 year old " policy, would limit my choice when replacing my car.

There are many cars available on the used car market that are **JUST OVER** 3 years old because lease company & PCP agreements most commonly, run from new to 3 years old. There are far fewer cars available, just under 3 years old.

I suggest that a limit of three & a half or four years old would help most drivers & the quality of the "taxi stock " would still be very good.

That would probably still not be good enough for the "Prestige drivers". The luxury brands can still look immaculate & be reliable at far greater ages.

The quality of the " prestige private hire vehicle " stock will inevitably be diminished if you take the "3 year old " decision.

12. I applaud the introduction of the date by which only ULEV will be registered for this policy. However, this will require many more charging points in the street and at destinations like stations. airports, shopping centres, hospitals. What arrangements are being made to liaise with such organisations to co-ordinate the introduction of fast charging points in places other than public car parks.

Of course most taxi and private hire drivers will want to recharge at home. But not every one will be able to afford installing such private charging points or indeed be living where this is practical. We can only hope the Chancellor covers this point in the budget and proves to be more generous than previously.

13. 1) *The no age policy for taxis/private hire vehicles was adopted on 1st March 2016. And was still included in the policy which was dated 1st March 2018 to 1st March 2023.*

Can you explain as to why this is proposed to be changed in the 1st April 2020 to 31st March 2025. Policy considering that it has only been adopted for 4 years?

2) *When considering the changes proposed for new submitted vehicles, what was the reasoning behind not introducing (ULEV) on 1st April 2020. Rather than wait until 2023?*

3) *The proposed changes will incur higher costs to owner drivers when having to buy replacement vehicles in an already difficult financial time. If the introduction of (ULEV) was introduced on 1st April 2020 it would enable owners to buy older cars that still met the (ULEV) requirements if the no age policy was kept.*

4) *If the new policy is adopted it could lead to encourage more dubious practices of some drivers to maintain a level of income that is needed to pay for all other outgoings, such as rents, mortgages, hire purchase for vehicles, and an increased amount of hours worked. All issues that may arise if the policy is adopted and ultimately reflecting on the service provided by the taxi industry in Waverley.*

14. My main concern is the age limit on vehicles being 3years from April. I agree completely to aiming for everyone to have a vehicle that is a ULEV, However I would like to ask the question as to why it has to be no older than 3 years old? My current vehicle is an ULEV and is 5 years old. Buying a car that is no older than 3 years is really expensive and would have a major impact on myself and I'm sure everyone else, to the degree that I would have to consider my future as a taxi driver. It is really difficult at the moment, every year everything goes up In price including your prices, but the meter price has stayed the same. Please can I point out that I don't want an increase at the moment as taxis are already way to expensive.

There has been a massive increase in the number of drivers, so many, that this past Friday I couldn't get on any taxi rank In Farnham. Castle street was full and queuing up to almost the Nelson Pub. West street had 3 taxis on and the station was full with 6 extra taxis in the bus lay-by. Oh and I nearly forgot about the artificial rank outside of the slug and lettuce. I work long hours everyday just trying to survive, I could earn more money a week working at Sainsburys and have all the benefits that come with it,sick pay holiday pay etc. I'm only talking about Farnham, I know it's only a small part of Waverly but it must be bad elsewhere as lots of drivers from Godalming and Haslemere are coming here throughout the week.

If the 3 year age limit is applied it will be forcing people to become more in debt and have a major impact on drivers mental health, the amount of working hours will have to increase just to survive. I also think that at the moment a lot of people have bought Mercedes which are better vehicles a 3 year old Mercedes is well out of most drivers price range and so you will end up with drivers replacing their vehicles with cheaper vehicles that have higher mileage.

Good vehicles to buy are ones that have been leased out however these would be no longer available as lease periods are normally 3 years and so then the vehicle would be to old for a taxi under the proposed new rules.

The policy about not using written off vehicles is not very clear do you mean all cats?

The tinted window policy has made it extremely difficult to purchase a vehicle if you are to keep it at a certain percentage it needs to be made easier somehow for when purchasing a vehicle. Why can't you allow windows that have been in the vehicle from manufacture?

I am fully supportive of working together with Waverly borough council to benefit the environment and the public and I have a few suggestions for the new policy.

All new vehicles [from April 1st 2020](#) should be ULEVs

All vehicles should have the facility to take electronic payments

No need to look at a fare increase at the moment (unless you bring in the 3 Year old age policy)

So to summarise:-

Why are you changing the policy now when the current policy doesn't expire to 2023?

Why are you changing the age of vehicles?

Why are you changing the window tint to 22% and not just to manufactured standard glass?

What's the reason for stopping previously written off vehicles from being tested if they have been fixed and declared as being repaired satisfactorily?

Can you put a cap on the number of vehicles in Waverley?

15. With reference to your recent email regarding the proposed changes to your licencing policy my main concern is the reintroduction of the age policy.

Firstly I feel that Waverley Borough Council have no idea how hard it is to make a living as a taxi driver. This is mainly due to the fact that they will not cap the number of licences issued because 'everyone has the right to earn a living'. No other organisation creates jobs for this reason. If there isn't a vacancy then you have to go elsewhere. By doing this you are actually making it extremely difficult for drivers to make ends meet without working unsafe hours and by introducing this policy would actually put a lot of people out of work!

I don't know how you expect drivers to be able to afford to replace their vehicles once they get to 7 years old with a new car that is less than 3 years old?

I personally will only finish paying for my current car in May 2022 and at that point it will be 7 years old so would then only be licensed until December 2022. I would then not be expecting to have to start all over again with a new car so soon. As long as it passes the relevant tests then I don't see what the problem is?

You are also saying that it would have to be an ULEV which is very expensive and again would only be licensed for 7 years. Where is the incentive to do this?

16. I understand the council are considering a fare increase for Waverley drivers.

I propose an increase of 20 pence on tariff one.

Basic fare £3.60 Charge for any distance not exceeding. 11/13 of a mile (1489.2 yards, 1361.7 metres)

For each subsequent thirteenth (1/13) of a mile (135.3 yards

Waiting time to remain the same £18 per hour. Pro-rata with all the other tariffs.

With the vehicle age policy the council are proposing, I would suggest allowing vehicles to be licence up to the age of 4 years rather than only 3 years old. Leasing companies tend to sell a lot of their fleet cars once they reach 3 years old making

these vehicles too old to be licensed with Waverley Borough Council. In addition to this from having an open vehicle age policy and restricting it to only 7 years I would suggest 8 years would be more appropriate.

17. Busbridge Parish Council is happy with the new policy.
18. Please find below my response to and suggestions regarding the consultation; plus some additional observations which I would like you to bring to the attention of the licensing committee when they next meet to review the licensing policy to 2025.
 1. "From 01 April 2020 a vehicle submitted, for a new vehicle application for licence must be **under 3 years old** from date of first registration. Once licensed a vehicle may continue to be licensed up to the 7th anniversary of first registration. Once any vehicle reaches 5 years of age, it becomes subject to 6-monthly tests." – **excellent idea**. I fully support this proposal. How will the council conduct the 6 monthly test?
 2. "Existing licensed vehicles that are over 7 year old, or that will become over 7 years old can continue to be licensed until the 31 December 2022. From 01 Jan 2023 a vehicle will not be licensed if it is 7 years old or more from date of first registration." – **not a good idea**. Some cars (Hackney and Private Hire) are very old indeed. I suggest: vehicles should only be **licensed until 31 December 2021. From 1 Jan. 2022 a vehicle will not be licensed if it is 7 years old...**
 3. "From 01 January 2023 a vehicle submitted, for a new application, to licence must be an **Ultra Low Emission Vehicles (ULEV)...**" – **excellent idea**.
 4. Clause 27: "Private Hire vehicles shall be of a **suitable type, size and design**" – how are these terms defined exactly? What is a 'suitable type etc'?"
 5. p. 28 **the penalty points scheme**: is this different to penalty points under the normal Road Traffic Act 1988 – DVLA recorded scheme? Or this is Waverley's own scheme under the bylaws and secondary legislation issued by Waverley B. Council? Who actually 'awards' these points? Do other councils do the same? Is the Woking or Guildford penalty points scheme the same? Is there a national register or data base? Can drivers simply ignore these points as they work in another borough?
 6. Could the Council please ensure that all **operators have an office within the Waverley boundaries**. This review should take place annually or at least every two years.
 7. **The Knowledge test**: your document is silent about 'good use of written and verbal English' as a requirement to pass the test. Is the test multiple choice? Is no reasonable English required?
 8. it is my understanding that the knowledge test (Waverley) is taken by each driver only once; how does the Council ensure that each driver who might have taken the Waverley Knowledge many years ago is still a fit and proper person? Should each driver not (re) take the knowledge test every four years?
 9. Can the Council ensure that drivers who have had their licence revoked in another borough, e.g. Woking, Guildford or further afield, should not be able to apply for a hackney or private hire licence in Waverley.
 10. Could the Council consider introducing a **taxi rank situated in Godalming High Street** e.g. outside the Fat Face shop – and remove the rank at the Crown Court carpark (old Waitrose carpark).

11. **DBS (enhanced) checks:** whilst new drivers have to undergo these checks – does the licensing committee/ Council check existing drivers' DBS (enhanced) certificates?
 12. How does the Council make sure that badges/ DBS/ drivers' own badges/ on cars etc. are not forged or fake documents (i.e. lazer copies)?
 13. How often are drivers' documents checked by the Council's Licensing Committee? Are there spot checks or does the council rely only on 'tip offs'?
 14. "If a licence has expired, even by one day, then it is no longer valid, and therefore there is nothing to renew. **The applicant may** have to start the full process from the beginning..." – why do you use the conditional tense here? Why not make it clear: "the applicant will have to..."?
 15. "**Mandatory CSE and safeguarding training for taxi and private hire drivers.** The training would include how to spot signs of child sexual exploitation" – **excellent idea**; whilst the Council is requiring all new drivers to undergo this training, what about existing drivers?
 16. Once a driver has had '**child exploitation' training** – what happens then? It is not only sexual exploitation but also county lines/ drug delivery etc. exploitation.
 17. What sanctions are in place if a driver engages in the facilitation of child exploitation?
 18. **Annexe 6 para 4.3 notification:** "Existing holders of driver's licences are required to notify the council in writing within five working days of receiving a driving licence **endorsement, fixed penalty notice, warning, reprimand, police caution, criminal conviction or other criminal proceedings.**" How often does the Council check that this has been done?
 19. Para 9.3: "A licence **will not normally be granted** if an applicant has more than one conviction for a dishonesty offence." Why is the word 'normally' in the text? Why not "a licence will not be granted" -
 20. Overall the various policy clauses contain too many conditional tense – terms (may, would, could etc) – also featuring the word 'normally' or 'usually' – which provides a 'get out clause' for drivers and operators.
19. Here is my opinion regarding 12th feb meeting relating to the age of vehicle.
When we buy vehicle for taxi please allow us at least 5 years old after getting plate it should be allowed for 7 years to use in taxi.
20. Thank you for advising me on the Waverly Policy Review, and the opportunity to make comments.
- As Guildford is one of the Authorities who have seen a number of our drivers migrate to Waverly, I am grateful that this and the need to act is recognised.
- As such, moves to reintroduce an age limit are welcome. The report also mentions use of door signage and I would recommend this for both hackney carriages and PHVs so as to enable easier identification and enforcement.
- Otherwise, for vehicles and operators the measures proposed are welcome.
- For drivers you are proposing the safeguarding course and driving assessment. There does not appear to be any proposal for drivers to complete a knowledge test or equalities training as recommended by the draft s.177

guidance. For this reason, I would recommend that you require a BTEC in The Introduction of the Role of the Professional Taxi and Private Hire Driver (details on our website). This would cover the English, knowledge of legislation and equality issues, amongst other things and help with improving customer service in the trade.

21. I wish to express my delight in the proposal for the amendment to the current Window-tinting policy.

I have for a while wished to apply for a Hackney Carriage licence, but have not been able to due to factory fitted tinted windows and the need to uphold privacy for wheelchair users.

I would be very pleased if I could be informed of the earliest date that I may submit my application to transfer from Private Hire licence to HackneyCarriage licence.

22. Why does there have to be an age restriction on vehicles, as long as they pass the stringent taxi test?

When some people bought their current car to be used as a taxi, like myself, we planned ahead and went for something that was going to last if we spent good money on it, but now having to face getting rid of the car a lot sooner than anticipated. If these new rules go ahead, who is going to invest a serious amount of money to buy, and indeed to run, knowing you're not going to get anything back from it after 7 years of age? I predict some people will probably get the cheapest car, which could well be unrefined, uncomfortable and quite possibly unreliable, and spend as little as they possibly can on it knowing they have to get rid of it regardless when it is 7 years old.

Surely by forcing people to buy new or newer vehicles, and potentially scrapping their current ones could well be causing greater, unnecessary environmental damage due to the materials and energy used in manufacturing new cars.

Other scenarios to consider,

What about people who have just bought a car, say within the last 6 to 12 months to be used as a taxi and got a loan or HP contract to buy the car, who will now be under financial stress or hardship because of these proposed new rules?

What if you buy a 3 year old car, due to financial restraints (as not a lot of people can afford a new or even a nearly new car), and the car has a catastrophic problem rendering it useless, but cannot afford to fix it or buy a replacement vehicle yet again?

Why can't new taxis just be ULEZ compliant? By means of progress anyway, all cars from 2015 have to meet ULEZ regulations, so older cars will gradually die off (unless they are classic cars, which wouldn't be used as taxis anyway)

If there really HAS TO BE A CHANGE, which I personally am against, my possible suggestion.....

No age limitations. All new car applications must be ULEZ compliant, and existing taxis can still be used until they are changed and then they too must be ULEZ compliant. (ULEZ complaint being Euro 4 for petrol and Euro 6 for diesel)

This way it would ease any possible financial hardship in the future.

Personally, I'm all for public safety, but I also believe in enforcing current regulations on drivers and driving standards should be priority, before vehicle changes.

From 01 January 2030 Waverley will only accept new applications and renewals for vehicles which are ULEV.

On the Electric car front, from 2030, what will Waverley BC set up of electric charging points be like? Coverage? Costs? Has this already been thought out?

Vehicle engine size.

As the environmental issue is being brought up, why is there still a limit on a vehicles engine size? Nowadays, manufacturers are bringing out smaller, less polluting engines, so I feel this also needs addressing.

Window tinting

Tinted Windows. All vehicles must comply with the Road Vehicles (Construction & Use) Regulations 1986 and in particular the requirements relating to tinted windows, which states that as a minimum: The light transmitted through the windscreen must be at least 75% and the front side windows must allow at least 70% of light to be transmitted through them. Waverley also requires that vehicles will only be considered suitable where all rear windows allow at least 22% of light to be transmitted through them.

With regards to window tinting, when it comes to sourcing a replacement taxi, and according to the new proposed regulations, how will anyone know if the tinted windows, which come from the factory as such, will have the right level of tinting? As I for one, don't have a "light % detecting" appliance to check this, so is there a code on windows that can be looked up to determine just how much tinting/allowing light through?

23. The Parish Council is extremely concerned about the change in legislation that now requires community transport providers to obtain commercial operators' licences with the associated costs. This will impact their ability to serve those who cannot access public transport due to reasons such as social isolation, mobility issues or a disability.

The Council recognises that whilst hackney carriages are private businesses when considering their licence application at interview, please can Waverley officers establish the hackney carriage main area of operation, and the company name. For instance one would assume that a hackney carriage business called Godalming taxis would operate mainly around Godalming. This is important as hackney carriages can be hailed from the street and it should be obvious to clients that they are hailing a taxi serving their destination.

24. To make a change to the age of vehicle policy from currently, no age limitations which has only been in force for 4 years, to your proposed introduction of new vehicles being submitted for licensing having to be three years and younger as of 1st April 2020, with a life time of 7 years, gives any new intended purchaser very little time in which to make that purchase. This would have a detrimental effect on Taxi drivers business plans, as they would subsequently incur higher costs in the purchase of any such vehicles.

We would like to propose, that the age of vehicle policy be firstly changed to 5 years and younger, with a life time of 10 years from 1st registration, and secondly for this to be delayed until 2023 to then coincide with the ULEV policy that it is also proposed for that date of 1st January 2023. We are aware in Farnham that the majority of Taxis fall into the age group 5/10 years old, as it is with the largest group within Waverly. This proposal would allow Taxi drivers to have time to adjust their business plans and prepare for changes on 1st January 2023 and not 1st April 2020.

Whilst not part of the consultation directly, could it be proposed that Waverley Licensing have, in their possession, a light meter that could be used by Taxi drivers, when buying a vehicle with tinted glass, to ensure it meets with your requirements prior to committing to a purchase. Coupled with the above, could it be that more random checks are carried out within the Borough to eliminate border line illegalities of licensed vehicles.

25. The proposals to restrict vehicle age and encourage lower emission vehicles are welcome and consistent with the need to reduce emissions and improve air quality in Waverley.

It is suggested that further consideration could be given to how to fund rapid chargers at taxi ranks to support these proposals.

A reduced application fee for operators using lower emission vehicles might also be considered, to encourage uptake prior to the cut-off dates outlined in the policy.

26. **Vehicle age policy.**

We disagree with the reintroduction of a vehicle age policy as suggested.

If operators are forced to buy vehicles which are under 3 years old from date of first registration it forces the price of the vehicle up considerably. Many vehicles which operators purchase are just over 3 years old, these vehicles have just finished their initial 3 year lease and can be cheaper to purchase. In the main they will have been on lease or personal car plan and be main dealer serviced and maintained. Many operators can only afford to buy a car on a personal loan, or other types of finance, often over 5 years. By shortening the service life to potentially 4 years operators could permanently be in debt.

If a vehicle passes the council test we see no reason why the vehicle cannot be licensed indefinitely.

We would urge the council to leave the age policy as it is now.

More notice must be given if age policy is to be introduced, many drivers plan years ahead for replacing their vehicles.

If there is to be any changes made then 'grandfather' rights should be given to existing vehicles.

Private hire vehicles additional door signage

Private hire operators do not want this introduction. The current plate on the rear and front screen display should be adequate. Maybe a subtle disc in the rear screen similar to the PCO vehicles. Many customers get a private hire vehicle as they want a certain level of understated service and the appearance of arriving at their business meeting in a chauffeured vehicle. We can't see the reason for this change.

Tinted Windows.

The suggested amendment, below, needs to be simpler to understand so an operator can buy a standard manufactured vehicle knowing it will comply.

We would suggest that standard factory fitted glass would suffice.

All vehicles must comply with the Road Vehicles (Construction & Use) Regulations 1986 and in particular the requirements relating to tinted windows, which states that as a minimum:

The light transmitted through the windscreen must be at least 75% and the front side windows must allow at least 70% of light to be transmitted through them.

Waverley also requires that vehicles will only be considered suitable where all rear windows allow at least 22% of light to be transmitted through them.

Tinted films applied to the vehicle windows (after manufacture) are not permitted.

General comments

Many of the planned amendments will add considerable costs to operators and by doing this will put licensed operators under considerably more pressure, in what is an ever increasingly competitive market. Our costs are increasing every year from WBC, South Western Railways, servicing costs, insurance premiums to name a few, and we have not had a fare increase for many years.

What we don't want to happen is to risk more operators working 'under the radar'. This is already happening, and nothing is being done to stop it.

It is alleged some operators buy cars, or lease on a personal car plan, and then before council tests or MOT's, have the mileage 'corrected' so the vehicle would appear to have done less miles than it actually has. This artificially and illegally inflates the resale value of the car and deceives future owners as to the previous life of the vehicle.

I am sure WBC knows how many miles a full time operator would average in a year to earn a living out of taxi driving, anything less should be questioned.

27. *If you at the council want to understand what is like for us operating taxis, Before bringing in nonsensical and draconian regulations that could potentially be disastrous for us and for yourselves, and to show hard we work for sometimes not a lot , I respectfully suggest that the Council go and buy a car of the sort/style that we use, get it licensed, put one of your staff in it as a licenced driver, they work their 40 hour week, you pay the drivers salary, tax and N.I contributions licence fees insurance servicing/maintenance costs, run that car independently as a taxi, as we do, come and work with us at Haslemere station taxi rank. After six months I think you will find that that car has done a lot of miles, cost a lot of money to licence and maintain And you will also find there not a huge amount to made operating a taxi, I think you will find that at the end of six months the driver will hate the job and you, the council will be several thousands of pounds out of pocket, If you do this as an experiment to understand what it like for us, then you may begin to understand our fears about your proposals, be aware that on top of our licence fee, there is an additional licence fee of £500 per car payable annually to south western railway allowing us to ply for hire on their property.*
28. I believe that introducing a 3 year old age limit for newly licenced vehicles to be rather restrictive as it ignores a market which I & several of my colleges explore when looking to replace our vehicles,

Vehicles that become available on the second hand market when they reach the end of their PCP or Mobility contracts are a good source of low mileage dealer maintained vehicles of a high standard suitable for licencing, This source would be lost under the current proposal.

I also think the change from the current policy to the proposed policy to be quite dramatic & would suggest that any policy changes should be phased in over a period of time to soften its impact to licencees

I appreciate Waverley Borough Councils Position as regards Vehicle safety standards, & although I do not fully agree that a older vehicle is any less safe than a newer one, the newer vehicle is more likely to have more modern safety systems fitted, we must also consider the publics perception of 'newer vehicles being safer ' even if we do not entirely agree ! The public will probably feel safer in more modern vehicles.

Waverley must also do its bit for the environment & its policies must reflect a need to reduce harmful emissions & we should all do our bit wherever possible.

I Propose the following as an alternative for the licencing committee to consider:

From 1st September 2020 all newly licenced vehicles to be 5 Years old or younger at first registration (this will ensure all vehicles newly licenced will meet the current ULEZ (Euro 6) standard)

From 1st September 2022 all newly licenced vehicles to be 4 Years old or younger at first registration (This should mean that if the new Euro 7 standard is introduced this year as expected (most likely to be 1st September) all newly licenced vehicles from September 2024 will meet this standard)

Furthermore I think that it would be acceptable to licence vehicle up to the 10th anniversary of first registration subject to twice yearly testing when reaching the 5th anniversary of first registration (I believe a 7 year maximum age policy to be unnecessarily restrictive