

COMMENTS REGARDING THE REQUIREMENTS FOR DRIVER ASSESSMENT FOR ALL NEW APPLICANTS	OFFICER APPRAISAL
No comment	N/A
The proposed policy states that "We have concluded that the standard DVLA driving test provides sufficient evidence of driving competency for the drivers of hackney carriage and private hire vehicles" but then goes on to contradict this by requiring a driver assessment. Standards for this assessment seem to vary wildly from area to area with some official testers seeming to be determined to fail applicants at any cost, contrasted by others who have a much more pragmatic view as to what is required. Without a universal standard of testing this is just an exercise in box ticking and money wasting.	This is on page 13. The reference has been deleted
all improvements are good	Supportive comment
It's beneficial for the clients to be understood by the driver and for the taxi applicant to understand the paperwork they are reading otlr when filling in a form.	N/A
Yes,I strongly think that would be a good idea.	Supportive comment
I don't know about the new applicants	N/A
They have to provide the English test or proof of English.	N/A
English test and knowledge test need to be applied	N/A
Agreed, good idea.	Supportive comment
The rules & regulations should be the same as Gloucester. Far too many drivers are given licenses who would not pass the criteria In Gloucester and this is very unfair for drivers and company owners like myself. Gloucester & Cheltenham licensed drivers have not been happy about this for many years so do the right thing and implement the same rules for ALL!!!	Supportive comment
unlikely that you will be carbon neutral by 2030. the science states that we do not have enough CO2 (0.04%) at the moment and any reduction will kill plant life.	N/A
I have done taxi in London	N/A
Not really practical as all drivers have passed there test and hold a licence issued by DVLA is additional revenue for TBC and another cost for applicant	TBC will not be receiving any income from this
Fully support all recommended changes; Proposed measures are what was in place when we first got licensed in 2014. Driver standards drastically need an overhaul and drivers should show willingness to comply and jump through some hoops to achieve the licence. I also think should go further and include a mandatory first aid course	Supportive comment
I am a person who likes to travel with children and to drive in different cities and the country	N/A
There should be stricter rules and punishment around drivers who refuse passengers with guide dogs. It's illegal to refuse guide dogs without a valid exemption certificate and hat needs to be presentable at all	N/A

times. Too often drivers will arrive to pick up a blind or partially sighted passenger then make excuses that they can't take a guide dog or in some cases just drive off leaving the visually impaired person stranded in the street.	Any breaches of Equality Act 2010 will be investigated
As Cabinet member for Licencing at Cotswold District Council I applaud that Tewkesbury BC are updating their Taxi and Licencing policies. It is good to see that you are consulting on revisions in the current policy which bring it in line with other Gloucestershire licencing authorities. Having spoken to our Licencing department we are fully supportive of your recommendations	Supportive comment
Drivers assessment is good way to improve the quality of your work. So it should be done for the betterment of both drivers and customers.	Supportive comment
Driver assessment are very very important	Supportive comment
I really don't know what to say I believe Tewkesbury licensing officer should decide on that as I don't have to right or opinion to say	N/A
We disagree with this new proposal. If the new applicant has passed a drivers test why should they be tested again also why would an approved provider be any better qualified than a DVSA test instructor, this is an additional requirement that is unnecessary.	For Committee discussion
None	N/A
It is very helpful for new drivers	N/A
Must have the English proficiency leavel life in UK Test	Already in place
unable to see these documents	Link provided
Way too much waiting	The team have reduced the service delivery timescale from 12 weeks to 10 working days since 2021
council always make decisions good for people of gloucestershire i would recommend to add driving assessment for only new drivers and age 65 and over . it will be unfair to taxi drivers who been taxi drivers for 10 years or more with no driving convictions or offenses to go through this process again thanks regards	For Committee discussion
No comment	N/A
No need for it, if he had his licence for 5 years and above.	For Committee discussion
They should not use operators just to get license plate and move to other operators just less than one month later	N/A
There should be driver assessments test for all new driver to want to become a taxi driver	Supportive comment
Agree	Supportive comment

<b>COMMENTS REGARDING THE COUNCIL VEHICLE TEST REQUIREMENT</b>	
<p>From 01.06.24, a taxi or private hire vehicle is required to have at least 1 Council Vehicle Test a year. Vehicles aged 5 years and over are required to have a Council Vehicle Test every 6 months - Question - Is this an MOT or another type of vehicle test? Is this going to cost me more money?</p>	<p>Yes. The test will be chargeable and will be Council prescribed looking at the cosmetics of the vehicle, plate display, fire extinguisher etc.</p>
<p>The link to approved vehicle testing stations does not work. Whilst I agree that it is important to ensure vehicles are tested to proper standards, if there is any suggestion that an M.O.T. station is being soft on taxi or private-hire applicants then they should be reported to the relevant authorities. Limiting testing stations can lead to real issues regarding retest availability. Drivers have struggled to get retest appointments and can find themselves without income to support their families for extended periods as a result. Having recently performed a phone around of various MOT stations I was unable to book an appointment with any of them within a two week period as they were fully booked and suffering staff shortages. There must be options and protection in place for drivers so they may be able to continue working at the earliest opportunity.</p>	<p>The link does not work presently as there has not been a procurement exercise. MOT's do not cover the higher standards such as wear and tear and to ensure that vehicles are a good standard. The licensing team receive complaints and this will ensure that there is a test in place where vehicles are being inspected to standards set by TBC similar to other Glos. LA's</p>
<p>safety is priority</p>	<p>Supportive comment</p>
<p>A car should always be presentable and in good roadworthy condition, and the Council should have the right to check this.</p>	<p>Supportive comment</p>
<p>Yes it must need to be done</p>	<p>Supportive comment</p>
<p>Mot test should be carried out as requested</p>	<p>N/A</p>
<p>It's very good to test the vehicles is safely for everyone</p>	<p>Supportive comment</p>
<p>They should take a test drive.</p>	<p>N/A</p>
<p>Yes</p>	<p>Supportive comment</p>
<p>We still do not agree with this change. MOT Testing stations are regulated and approved and work to a common standard. Procurement of app stations by TBC will inevitably result in increased costs for operators and will also reduce availability. This is an unnecessary change and not one that is adopted by other licencing departments.</p>	<p>This has been misunderstood. Also, in place at Gloucester, Stroud and Cheltenham</p>
<p>Good</p>	<p>Supportive comment</p>
<p>Mot test to be atleast 3 months validity required</p>	<p>N/A</p>
<p>Should be within 5 years like Gloucester and more severe checks on the individuals etc</p>	<p>Supportive comment</p>

I am willing to take test	Supportive comment
<p>I strongly disagree with this new policy as the MOT test is already a comprehensive examination which is mandated by national regulations designed to ensure vehicles meet safety standards, so why the need to add further tests?</p> <p>This will create more burden on Taxi drivers like me especially financially. Having multiple levels of vehicle testing, including both MOT and council tests, could lead to confusion amongst us Taxi drivers. Different testing criteria and standards could potentially create inconsistencies and conflicting requirements, resulting in confusion.</p> <p>Instead of duplicating further tests, it would be more beneficial for the council to work together with the authorities in charge of MOT tests to support their existing policies.</p>	<p>The MOT only covers the mechanics of the vehicle. This will further enhance the standards of the vehicles</p>
<p>Concerns that there will not be enough garages that adopt this scheme and if only a couple of garages would prove difficult to get multiple vehicles tested within the time frame there needs to be sufficient garages to deal with the volume of vehicles licensed</p>	<p>Supportive comment</p>
<p>No issues for requirements. However, P21 - Vehicle Test Correction of defects; some clarity or would like to see some officer discretion around MOT advisories particularly for Chauffeur industry or those with LWB Luxury Saloons &amp; V-classes which come with on-board low wear alerting systems. Advisories are very subjective. Early replacement of parts unnecessary would have a financial and environmental impact. P24 Accident Damage; disagree that councils should allow any 'written off' vehicles to be licensed for PH. Whilst a car might be suitable to go back on the road for private use, its safety features will never be the same and PH use involves a higher percentage of time on the road. This not only seems a step back in passenger safety, but also potentially opens the council staff up to liability should any criminal or civil action be sought should vehicle safety features fail in an accident after council have approved its use. Think this is an unnecessary risk for passengers and for council staff to take.</p>	<p>Valid comments.</p> <p>MOT advisories – have put an example, such as tyres close to legal limit</p> <p>Accidents – have researched and included a section in the report. Have amended policy</p>
<p>the car has all up-to-date services and has no modifications to the engine</p>	<p>N/A</p>
<p>We at the Gloucestershire Sight Loss Council would happily join in the consultation and give advice or training to drivers to help deal with carrying blind and partially sighted passengers</p>	<p>Misunderstood – have fed back to Sight Loss Council regarding the safeguarding and equality awareness training that will cover this area</p>
<p>approve</p>	<p>Supportive comment</p>
<p>to be honest, I don't know, but in the near future I will try to get more information</p>	<p>N/A</p>
<p>I happy to take any test that is required</p>	<p>Supportive comment</p>
<p>Test required for the vehicle is already going on its best</p>	<p>Supportive comment</p>
<p>Vehicle test requirement has to be mandatory in my opinion</p>	<p>Supportive comment</p>
<p>I believe the council test should be done anywhere so long the vehicle is good</p>	<p>Supportive comment</p>

We totally disagree with this proposal. We have to use approved DVSA MOT Centres and should be given the opportunity to select the centre of our choice. Vehicles over 5 years are already tested every 6 months. By TBC Licensing becoming responsible for procurement of approved testing centres will ultimately result in additional costs for operators, this is not in line with other Gloucestershire LA's	The MOT requirement will be removed and replaced with the Council inspection
Council or council approved MOT tests is a good idea. I agree with the proposal	Supportive comment
I believe that The MOT certificate would be enough	Not supportive
MOT TESTING CENTRE APPROVED BY DVLA . BUT UNDER THE BARROW COUNCIL BOUNDARY	Out of area driver
on new license and renewel license it is a good practise for new vehicles .	Supportive comment
"Council vehicle test"!! if the mot'er is doing thier job correctly it shouldn't matter where vehicle is mot'd but should be stated no advisors on mot, all vehicles after any mot should be deemed safe	For Committee discussion
MOT is enough.	Not supportive
That vehicles are road worthy	N/A
In my opinion this is very important the vehicle should have special inspection before getting a license	Supportive comment
Agree	Supportive comment

<b>COMMENTS REGARDING THE REVISED AGE AND EMISSIONS POLICY FOR VEHICLES</b>	
<p>Vehicle Renewal Applications</p> <ul style="list-style-type: none"> <li>- From 1 January 2024, an application to renew a taxi or private hire vehicle will be processed until 31 December 2025. Any vehicle licence that expires after this date must comply with the above requirements.</li> <li>- From 1 January 2026 - An application to renew a taxi or private hire vehicle will be refused if the vehicle is not Euro 6 compliant or ULEV or EV and over 10 years of age (WAV's over 15 years of age).</li> </ul> <p>My MPV is in immaculate condition. I simply wont be in a position financially to buy a Euro 6 compliant 9 seater MPV by the date you are proposing. So, this means I wont be able to keep using my vehicle and I will lose 50% of the volume of the work I have but this amounts to roughly 65-70% of my revenue. I will therefore only have my car left to use and this wont be enough for me to continue in this industry because I simply cannot earn enough money to survive with just my car that can only comfortably carry 3 passengers. So if the dates you are proposing are realistic then I (and I imagine quite a few others) wont be able to continue in the industry.</p>	<p>Unsupportive comment</p> <p>The licence holder has 2 vehicles – one s Euro 6 compliant – the other is a diesel 8 seater Ford Tourneo that is 9 years old</p>
another step forward	Supportive comment
Understand the requirement, but shouldn't be imposed as not everyone has the means to get one.	Unsupportive comment
10 years or less	Supportive comment
I believe this will have a huge impact on everyone financially. Many only do school run and many companies operate minibuses. It will be huge cost. If there are grants and loans available then it would be a good start. Gradually over the years everyone would have changed vehicle to euro 6.	Unsupportive comment
I think is very hard to change the vehicles ages because drivers are not earning enough money to pay a very expensive car no money in taxis now customer itself have difficulty to pay the drivers sometimes no money	Unsupportive comment
They vehicle standers shouldn't matter.	Unsupportive comment
Yes	Supportive comment
Whilst we agree to changes for newly registered vehicles for all categories. We strongly disagree that any changes should be made to requirements for WAV's that are currently licenced providing they have compliant IVA's. at present there is no age limit on WAV's and this should remain in force for all vehicles that are currently licenced. Revisions to only apply to new applications.	Unsupportive comment re WAV's. Potential to change WAV policy for new vehicles only

Not very good in the sense that So many drivers won't have enough resources to pay for vehicles under five years old. And this may result to shortage of taxes. And it will have a negative effect on the commuters	Unsupportive comment
Ditto	That all Councils have a generic policy – difficult without changes to National Legislation but we are striving for this in Gloucestershire
Hybrid vehicles most better than old other cars	Supportive comment
I have been a private hire driver for 20 years, all of them self employed, the cost of second hand cars have sky rocketed in recent years, mostly due to shortages of stock, the 5 years old rule you are proposing to bring in, is not going to be financially viable for most drivers, unless they start taking out big loans etc, how much we now earn, just doesn't match with having to register a car no older than 5 years, I get the euro 6 thing by all means, but coming from someone who has done this job for 20 years, I know I am going to struggle along with others when it comes to registering our next vehicle, this should be relaxed slightly, and I'm sure every driver would agree, subs to our operators. Endless car repairs, constantly rising insurance, the list goes on and on.	Unsupportive comment  For Committee discussion
100 all cars need to match the current standards rules and regulations	N/A
I willing to take	N/A
<p>I am very disappointed with this new policy. Reasons will be divided into two categories.</p> <p>Personal Reason: I just purchased my car this year in January, and i purchased a fairly good condition low mileage car which was manufactured in 2012. The car costed around £9000 and the mileage was 12,000. So this new policy will affect me financially because resale value will be around £2000-3000. I received my taxi licence at around the same time, and i wasn't prewarned about potential policy changes, so i feel that is unfair as well. Forcing me to change a fairly good condition car also goes against sustainability and adds to waste because it means i have to change car in less than 1-2 years. Overall, this change is going to cause a financial burden upon me and i feel treated unjustly and unfairly and it is going to affect my livelihood.</p> <p>Reason as a community of taxi drivers as a whole: As I use my taxi licence for School runs, I meet many different drivers with their different vehicles on a daily basis. I have seen that most do not have cars which are as new as five years. This means so many of us will have to change our cars and be under this financial pressure as a whole.</p>	<p>Unsupportive comment</p> <p>This is a Euro 5 11 year old vehicle</p>

<p>This means less sustainability and results in wastage.</p> <p>An alternative: Instead of mandating these new rules for the car age and emissions, the council should offer incentives for drivers who change to newer or EV cars. This would be more fair and effective.</p> <p>Last alternative: offer grants to help us purchase these new vehicles.</p>	<p>The Council are investing money in widening the network of charging locations within the Borough.</p> <p>Any switches to electric vehicles would need to be supported by Central Government</p>
<p>MG are concerned that the upper age limit is not practical, there is currently a shortage of used vehicles and given that many operators will have to change older vehicles there will not be sufficient vehicles available, also larger operators are disadvantaged financially in comparison with single p/h drivers this will put many larger operators out of business resulting in lost revenue for TBC</p>	<p>Unsupportive comment</p>
<p>Have no concerns about what is being proposed. Would only ask that when looking longer term around mandatory electric vehicles or vehicle supply issues that the council could consider a 'officer discretion' particularly for the chauffeur industry when a car aged 5yrs or less can mean an investment of over £60k per car and supply might not be there depending on industry restraints. Also there are no electric cars on the market that can provide the range for chauffeur work which is predominantly long distance and would require much more logistical restraints on customers.</p>	<p>For Committee discussion</p>
<p>No comments</p>	<p>N/A</p>
<p>approve</p>	<p>Supportive comment</p>
<p>Vehicle should not be very old it should be well kept and maintained.</p>	<p>Supportive comment</p>
<p>Emissions policy is good for global warming</p>	<p>Supportive comment</p>
<p>Regarding the age revised is okay by them will need to give time on this as cars are very expensive for short years cars but long notice will be okay for this changes</p>	<p>Supportive comment</p>
<p>We do not agree with proposal for Vehicle Renewal application - that being they would only be exempt from age limit until 31st December 2025. We strongly believe that this should be up to 5 years from implementation date which would allow operators of our size to upgrade and renew vehicles in our fleet to comply with the age policy. This proposal must be reconsidered as a matter of grave importance it will not only effect the operator but also the staff employed to drive the vehicles.</p>	<p>Unsupportive comment</p>
<p>As long as vehicles are safe and comfortable</p>	<p>Unsupportive comment</p>



Hybrid Cars only in next 5 Years	Unsupportive comment
we Uk citizen been hit hard by recession and all energy prices and cost of living it would be wise decision to at least have 8 years age policy . not five as cost of living is already too high .	Unsupportive comment
Don't agree with max age on vehicles as long as it comply with emissions when new vehicle some people can't afford new cars, if vehicle already in system should be able to go for as long as needed but kept safe and roadworthy and clean	Unsupportive comment
It should be a euro 6.	Supportive comment
10 years old or less no more than 10 years old	Unsupportive comment
The vehicle should be not more than 7 years old	Unsupportive comment
Agree	Supportive comment

<b>ANY OTHER COMMENTS</b>	
<p>I feel that with the additional testing, new demands in terms of how old the vehicle can be, emissions etc will put many of us PH drivers out of business. My insurance has already increased this year versus last year because insurers have put their fees up. There is already a shortage of drivers in this industry and it's clear to me why that is the case - it's financially very difficult as it is and with the proposed changes for some of us it will be impossible to continue. I have a good number of customers that require my 9 seater MPV for transfers but if your proposed time frames come to fruition I simply wont be able to offer that type of service to my customers as it's not financially viable for me to purchase a newer one for at least 2 more years from now - have you seen the cost of second hand diesel vehicles. All I can afford is one around 7 years old. There's no point of me buying one because I'll only be able to keep it for 3 years going by your new 10 year policy - it simply isn't financially viable to do that with the current cost of vehicles. Also - Electric 9 seater MPV's simply don't have a long have charge for me to even consider buying one - even if I could afford one.</p>	Not supportive
<p>On page 11 it is suggested that checks on refugees may be waived. We all read the news and are aware that not all refugees are who they say they are and their personal circumstances regarding age and country of origin are not clear. It is vital to protect the public from any risk from all applicants regardless of their background. I would suggest that a refugee should not be permitted to apply for a licence until they have a proven record in this country and a DBS report can be issued to reflect this.</p> <p>Regarding penalty points it is suggested that an existing licence may not be renewed if a driver has more than 3 penalty points on his/her licence. A member of the general public is permitted to drive with a maximum of 12 penalty points on their licence. A Hackney or private hire driver covers, on average at least 3 times the mileage of a private driver, often driving in unfamiliar areas at night where signage is unclear or speed restrictions have been recently changed. Whist drivers should at all times drive in a professional and responsible manner whether they have passengers in the car or not, they are ultimately human beings and, as such are prone to making mistakes and minor infractions. Taking a view that having more than 3 points on a licence in any four year period is placing all drivers under an incredible level of stress whilst trying to earn their living in an already stressful job. I wonder if any of the licensing team have ever tried driving at 3am in heavy rain in an unfamiliar area with a car full of drunk passengers behaving the way they do, often using flash photography in the back of the car or spilling chips and curry sauce over the seats and floor of the vehicle? The list of stress factors is enormous and licensing teams really need to factor this into their considerations rather than adding to them with threats of loss of livelihood.</p>	<p>This would be a licensing sub committee decision</p> <p>No changes to existing policy proposed. Gloucestershire common standards policy</p> <p>This has been clarified</p>

<p>A subject that isn't mentioned in the policy. Can a person licence a private hire vehicle if they don't hold a private hire driver's licence? I was approached by someone who wanted to rent private hire vehicles but does not want to drive them. Please can this be clarified.</p> <p>For operators, please can it be clarified in the policy how long bookings records are required to be kept. When enquiries have been made to licensing officers in the past I have been told anything from 3 months to 3 years.</p> <p>Insurance on vehicles. It was not made clear in the policy proposal what is acceptable when it comes to policy length. Some drivers insure their cars weekly or monthly but the vast majority annually. Short term policies are often helpful to drivers who don't have access to the funds for an annual policy but they put a burden on the operator to chase updated documents constantly and in some cases there are small gaps in cover where the policy holder isn't working but seems to be under the impression that it is ok to leave a car on a public road with no insurance for 12-24 or 48 hours. I would propose that the minimum policy length should be 30 days. It is commonly understood in the trade that updated insurance details can take up to 3 days to update on the national database so there is a grey area that may tempt drivers to take a risk. Minimising this with a minimum policy length of 30 or 90 days would be sensible.</p>	<p>DfT Statutory Standards suggest 6 months. Policy currently states not less than 12 months Insurance is valid regardless of length when licensing</p>
<p>all improvements are a good thing</p>	<p>Supportive comment</p>
<p>Euro 6 or less than 10 years old is ok but that 5 years or less would be extremely difficult for most of the drivers.</p>	<p>Unsupportive comment</p>
<p>Every one is struggling at present with living cost and high interest rates.</p>	<p>Unsupportive comment</p>
<p>Page 17 - Applying for a PHD Licence. We have noted that this section stipulated an Enhanced DBS is required. It does not state however that this must be "Other Workforce Category" which the council is currently stipulating. The current wording suggests any category of Enhanced DBS would be acceptable.</p>	<p>This has been checked and it clearly states workforce type</p>
<p>Transferring of plants from existing vehicle to a new acquired vehicle should be made more easier for drivers.</p>	<p>This process has been significantly reduced in time</p>
<p>General comment - it would be helpful if ALL Councils got their heads together to come up with a generic process , forms , medical certificates ,requirements to streamline and remove the need for people to jump through the hoops of all the different councils as it is now.</p>	<p>Gloucestershire common standards has achieved this for driver application requirements in the County. Difficult to achieve without a change to legislation</p>
<p>It it's good step be look after other circumstances thanks</p>	<p>N/A</p>
<p>Simple majority of drivers are using Tewkesbury system cause it's easier to pass and drive in Gloucester so this needs to STOP NOW !!!</p>	

We had made some comments previously about this area, but noted that we had not really provided you with any specific considerations to help improve so please find additional comments attached. We kindly request that plate exemption section of the policy is reviewed in its entirety.

Status of corporate accounts have absolutely no bearing of whether plate exemption is required. This wording is actually detrimental to the only aspect of the private hire industry in which plate exemption is a minimum expectation e.g. Chauffeurs.

Corporate contracts are on the whole won based on 2 factors...size of fleet and competitive price. Both these are indicative of private hire companies which the public associates to Taxi's such as Andy Cars, Starline etc. Neither of those factors provide any grounds for Plate Exemption unless a contract specifically outlines an exemption as a contingency of the contract. Chauffeurs rarely have large fleets because the cost of luxury vehicles and finding quality drivers meeting the standards mean it is not possible without significant external investment which you will rarely find outside of London and major cities.

Plate exemption should be judged necessary on 3 factors alone;

1. Where the work being conducted is indicative of "Chauffeuring" (e.g. bespoke services often wait & return services/day hires or long distance, whilst can include airport transfers; these are to customers who also use other chauffeur services or are requiring a specific chauffeur service above and beyond that of a taxi).
2. Security Aspect in which the customer needs to travel incognito or in unmarked vehicles for no traceability using publicly accessible systems (e.g. only traceable by law enforcement or other similar bodies)
3. Discretion for which a customer is willing to pay a higher price for services that afford them anonymity and discretion during their travel.

In reality the public see only two categories for private hire...Taxi (which covers hackney and plated private hire vehicles) and Chauffeur (plate exempt). Nothing else.

Chauffeuring is not just about having a fancy car. It is about the drivers persona, appearance, skills, etiquette and then yes about vehicle type, model and standard. A chauffeur meets all 3 factors for justification of plate exemption.

Evidence to determine if an operator/driver is a chauffeur are things like what vehicle (e.g. Long

<p>Wheelbase Saloon or MPV), cost of services, services offered, customer base etc.</p> <p>Chauffeurs maintain the highest level of standards and regulation compliance. Not just because of council policy, but because when dealing with high-net worth customers or people booking for special occasions they will not tolerate anything less. Because of this the chauffeur needs plate exemption.</p> <p>By judging plate exemption solely on the existence of contract work you are flooding the chauffeur industry with taxi drivers who have an executive car, but do not have any other attributes of a chauffeur. This is of greatest detriment to the chauffeur industry and is undermining the safety and security the publics association with a chauffeur service. In the currently policy you are making it difficult for the actual chauffeurs to carry out their work even though they are the only ones who can justify the necessity for exemption.</p> <p>Many thanks in advance for taking the time to consider our comments and feedback for your policy review.</p>	
<p>PH Drivers should be able to form a committee to be held monthly/quarterly to represent PH drivers/Operators concerns</p>	<p>Agree – nothing to stop this happening</p>
<p>P57. PH Plate Exemption;</p> <p>3.3.a Please can it be updated to cover Mercedes V-Class MPV's as they are the number 1 used vehicle for the chauffeur industry of which discretion is highest priority. Also remove E-Class and Lexus as these are not luxury vehicle consistent with industry standard where the need for plate exemption exists. These vehicles have become an industry standard for taxi/standard private hire. Maybe remove vehicle makes/models and say Executive MPV's (which would cover V-Class), Luxury Long Wheelbase saloons (which would cover Mercedes S-Class, Jaguar XJL, Audi A8L and BMW 7L), and Luxury SUV (Would cover any Range Rover etc) and then maybe say any other luxury brand vehicle council feels suitable for exemption. That would mean less need to keep updating policy wording with manufacture model releases.</p> <p>3.3.d The use of contracts is not something that is consistent with the chauffeur industry which require exemption. Corporate contracts drive down the price and restrict the flexibility of a service so are really only applicable for standard private hire companies who would not necessarily be applicable for plate exemption needs. Could wording be updated to say something like 'luxury services in nature' consistent with the chauffeuring industry and can demonstrate based on their customer requirements that exemption is a necessity for their business model. We then demonstrate to you and provide you evidence to support the need - again putting the onus on us as the operator rather than the council having to rely on general assumptions based mainly on corporate account status.</p>	

<p>1. You make no distinction between taxis that are in the road all the time, and tour guides that are seasonal and part time and I'm a Tour Guide.</p> <p>2. I drive for Rosehill Travel, but I'd like to also receive a private hire licence in my own name as well but I can't as live in Cheltenham and don't have a Tewkesbury address. This rule seems strange as I wouldn't just be driving in Tewkesbury. I already am affiliated with you. I can't seem to get around it. I don't want to have to hire an office in Tewkesbury as I'm not driving every day and tour driving is seasonal. It makes it too expensive. I wish you would consider this. Why do I have to live in an area with a Tewkesbury post code when I know others that don't? Could you please be more flexible on this?</p> <p>3. Why aren't private hire and taxi rules the same throughout the UK and why don't they cost the same? No-one is just going to drive only in the area where they actually live after all.</p> <p>4. I genuinely need your help with getting my private hire licence. Thanks.</p>	<p>We are not able to grant private hire licences to operators without an address in the Tewkesbury Borough by law.</p> <p>Legislation is outdated and every Council sets its own policies. Several bodies have been lobbying for legislation to be updated for years</p>
<p>I think language and communication skills will be very helpful</p>	<p>English Proficiency is in place</p>
<p>Whatever the licensing officer going to decide is okay so long the notice is long so people can prepare for this not short time which will affect a lot of people using the Tewkesbury as we need time to cop with The changes that is all I can say for now thanks for asking for our opinion before the law is pass.</p>	<p>There will be a 2 year transition period to comply with Euro 6 requirements</p>
<p>Yes - see below also note with reference to above comments, we seriously urge the council to consider the impact on operators of proposed changes as they will have serious impact on ability to provide transport for SENT pupils who need to attend school Age &amp; Experience - page 12, we disagree with proposed change. Accidents - page 23, 48hr reporting time is unworkable and needs to be reconsidered Appendix F. item 5 &amp; 6 - 48hr timescale is unworkable Appendix F. item 7, if this proposal is implemented the timescale for submitting driver list should be minimum 3 monthly</p>	<p>Unsupportive comment</p>
<p>New Vehicle licensing application needs to be changed. It takes too long and is costly to wait 1 month (with insurance) for the process to be completed. In line with moving to a carbon neutral council, application forms could be completed (and signed) online, rather than printed, completed by hand, scanned, then emailed.</p>	<p>There have been significant improvements to service delivery since 2021.</p> <p>Agree – online forms have been delayed</p>
<p>I think if the plate renew each 3 years better than yearly The prices are so high</p>	<p>Cannot grant a vehicle licence for more than 1 year by law. Fees are cost recovery</p>

take the decision of changes in 2025 not 2024 as taxi drivers are well prepared to costs they going to bear thanks	Unsupportive comment
Please don't do what Cheltenham did, max age of vehicle or certain colour, I'm independent and many others are and can't afford or get newer vehicles, could have a mot and or inspection every 6 months.	Unsupportive comment
No need for 2 MOT a year.	This will not be required once Council inspection is in place
Some vehicles are really bad especially the company I use to work for which is Bishop's Cleeve private hire the drivers cars are 17 years old or more it's shameful that's why I left them and move on because customers were complaining about the cleanliness of the cars	Supportive comment should changes be implemented
I would suggest there should be a standard to become a taxi driver, the driver should have go through all the test such as knowledge test , drivers assessment test , English test , and the vehicles should be also checked and should be new as at least 7 years old	Supportive comment

<p><b>MEMBERS OF THE LICENSING COMMITTEE WERE KEEN TO PROMOTE ANY LICENCE HOLDERS THAT HAVE CCTV INSTALLED IN THEIR VEHICLE. IF YOU DO, AND YOU ARE HAPPY FOR YOUR DETAILS TO BE PUBLISHED ON A LIST, PLEASE GIVE DETAILS ABOUT YOUR SYSTEM HERE ALONG WITH CONFIRMATION THAT THIS COMPLIES WITH THE ICO REQUIREMENTS</b></p>	
<p>I don't currently have CCTV installed. My higher end customers, sports professionals etc have expressed an opinion that this isn't something they would want because they have high profile conversations on the phone with agents etc and feel this is an intrusion of their private phone calls.</p>	
<p>I don't know yet</p>	
<p>no cctv in my vehicle</p>	
<p>Don't have a cctv installed.</p>	
<p>I don't</p>	
<p>CCTV is good idea. Resolves many issues.</p>	
<p>Me myself I'm very happy for my CCTV because it's my safety</p>	
<p>I have the camera in my vehicle.</p>	
<p>Okay</p>	
<p>We do have CCTV</p>	
<p>I have cctv installed</p>	
<p>No I don t have such a things to publish</p>	
<p>I have cctv fitted, have done for 5/6 years now I think, it's an NG2 system.</p>	
<p>Not sure about this one due to passengers privacy etc</p>	
<p>no</p>	
<p>Okey</p>	
<p>not happy to share</p>	
<p>See previous submission - support Dashcams, but think CCTV should be exempt for chauffeurs due to privacy and intellectual property concerns</p>	
<p>As per previous comments - consideration for CCTV exemptions for Chauffeurs due to the level of impact on customers privacy and risk of being in possession of intellectual property such as board meetings and other meeting contents, personal discussions etc. However, support Dash Cams across the board.</p>	
<p>We agree that CCTV has a place in Hackney and/or standard Private hire. But not for the Chauffeur industry. If CCTV was to be made mandatory for the chauffeur industry it would have a significant negative impact on the trade. We specialise in transporting people for longer journeys, wait &amp; return services and similar. Customers book these services for discretion and often use the time in the vehicle to hold board meetings, project planning and discussion of other sensitive topics. If CCTV was to be</p>	



installed not only would it be a discretion breach, but we would then potentially be in possession of confidential material that depending on what is covered in the customers travel could also be classified legally as intellectual property. Should CCTV be considered at any point to be mandatory I would kindly request an opportunity to come and discuss with the board for potential exemption requirements for the chauffeuring industry of the PH trade. However, can see a place for mandatory dash cams and do not believe they would impact on any discretion for customers.	
No comments	
I happy to install it	
Yes cctv came are most affected way to prevent the misconfusion between the tow drivers so it should be installed and I am happy to have my name for that	
I have a venture CCTV in my car and is very helpful	
I don't have	
We have a number of different types of CCTV cameras that are all ICO compliant	
N/A	
no cctv in car as not an insurance requirement this year.	
I am waiting for my cctv any moment	
I currently on have outward facing Road angel but records sound, will shortly have inward facing to trying to find right one	
I do agree with all this but I don't want my details to be in the list	
No	
N/A with present car Happy to be on list if future car has ctv Installed	

**OTHER RESPONSES:**

**GLOUCESTERSHIRE COUNTY COUNCIL INTEGRATED TRANSPORT UNIT**

**Driver assessment:**

Having read the TBC Hackney Carriage (Taxi) and Private Hire Policy the assessments carried out by TBC are robust. The 6 monthly requirement to have a DBS check is very reassuring, plus maintaining the update service.

When we inspect contracted transport we do come across some drivers who struggle to have a conversation with us. The language proficiency introduced by TBC is very welcome and we believe this will have a very positive impact.

**Vehicle Test:**

The only comment we would make is that we inspected a TBC licensed vehicle several months ago and the condition of it was 'very battered', we reported this to TBC and were surprised to receive a reply that said it was satisfactory. The vehicle was not a positive reflection on TBC Licencing.

**Emissions/Age policy:**

GCC welcome the revisions on licensed vehicles being 5 years and under.

What is the maximum age for a WAV ?

**Any other comments:**

GCC would like to ask what is the minimum amount of cover period for vehicle insurance is, when we've inspected vehicles we have encountered insurance that has a weeks cover note, and its been week on week. GCC would be interested to know if there is a minimum requirement for cover.

**CCTV:**

No comment

## **NATIONAL PRIVATE HIRE AND TAXI ASSOCIATION**

### **Driver assessment:**

There are actually some local authorities that are removing this requirement on the basis that any new applicant must already have held their full driving license for a minimum period of XXX (the period varies for some) which means that the driver has already passed this assessment in order to obtain that license, however, we do support the idea of a "refresher" performed by any approved local driving instructor.

### **Vehicle Inspection:**

This section is clear enough, sets out in simple language the requirements and is in line with most other local authority requirements, it is not too burdensome, and overcomes any issues with not having the national MOT certificate as we highlighted in recent articles. We do recognise and appreciate the requirement only applying to vehicles after their first birthday.

### **Age and emissions:**

As much as we recognise and appreciate the desire to be carbon neutral, we would actually recommend reverting back to the original stance on this.

However, if the new approach is to be adopted, then we would have some comments

New vehicle applications and change of vehicle applications from 1 January 2024

A new application for a taxi or private hire vehicle licence will be refused if a vehicle is more than 5 years old from date of first registration. It must also be Euro 6 compliant, ULEV or EV.

remove ""must be euro 6 compliant"" since euro 6 was adopted in 2015, and we are not towards the end of 2023, any vehicle less than 5 years old will automatically be euro 6 anyway, rendering this requirement meaningless.

An application to transfer a taxi or private hire vehicle licence (including a temporary change) will be refused if a vehicle is more than 5 years old from date of first registration. It must also be Euro 6 compliant, ULEV or EV.

EVs (Electric Vehicles) and ULEVs (Ultra Low Emission Vehicles) are exempt from the above policy and there is no age restriction on these vehicles.

New WAVs (Wheelchair accessible vehicles) are exempt from the above age policy but will be refused if the WAV is not Euro 6 compliant or ULEV or EV

whilst we recognise and accept that these vehicles are inherently more expensive to purchase, and would therefore fully support an extended age limit on such vehicles, it has to be considered that such vehicles are still made from the same materials, with invariably the same component parts, Chassis, Suspension, Braking systems, etc. As such, the vehicle will still deteriorate over time, with this in mind, may we suggest a 50% longer age limit, as opposed to no age limit at all.

The other issue of course with having no age limit to some vehicles, but an age limit on others, is the fact that this runs the risk of allegations or complaints of preferential treatment or favouritism towards those that may be in a better position to afford such vehicles to begin with, and of course the risk of older vehicles of such type actually being far less roadworthy than those vehicles that were actually taken out of service due to the restrictions.

**Other comments:**

We welcome the change to the converted vehicle section, much clearer and more achievable.

Security and CCTV section would benefit from a little more clarity, for example there is nothing to suggest what being fully compliant means, no links to the ICO code of conduct for the use of recording equipment, no mention of data controller at all, nothing that makes it clear that dashcams may not be used to record internally, not even audio, nothing to suggest any kind of minimum criteria; the only thing it says is "to ensure compliance".

**CCTV:**

We would have liked to see some mention for clarity here, that a dashcam is not CCTV, should not be used at all, and will not be promoted, since again, the mention of "complies with ICO requirements" is not enough to suggest any kind of regulation here.

**TEWKESBURY TOWN COUNCIL**

The Town Council is content with the content and wording of this policy.