

Comments to Hackney Carriage and Private Hire Licensing Policy

Comments in blue are from the Climate Officer for Spelthorne Borough Council

<p>Two Hackney Carriage drivers</p>	<p>We think electric vehicles are too expensive at the moment. With so few charging point it's a bit of a conundrum. waiting to charge is too restrictive especially when working / travelling.the environmental impact of an electric battery is negligible and raises concerns . Replacing batteries is expensive and also poses a recycling problem, and finally diversity of models adapted to the variety of consumer needs and preferences .</p> <p>I'm writing to let you know that we don't agree with the new policy for electric vehicles that the council is considering . I think the structure is not in place for this in the borough as yet . Also it limits the vehicles and doesn't give us the freedom to choose how many passengers we can take . I would much appreciate you having another look at this policy .</p> <p>The electric vehicle policy states that from the 1st October 2028 <u>new taxi licences</u> will only be issued to electric vehicles. This means that vehicles licences issued between the 1st October 2025 and the 30th September 2028 will be able to renew their licences until the vehicle is 15 years old. For example, a new petrol taxi licenced on the 30th September 2028 will be eligible for renewal of its licence until the 30th September 2043, by which time infrastructure and costs will have likely changed significantly. This will allow for a phased transition to electric vehicles.</p>
<p>One Hackney Carriage Driver</p>	<p>With reference to your email regarding the use of electric vehicles from 2028, i would like to oppose the idea as it is not easy to keep charging the cars, secondly we are already driving ulez compliant vehicles which causes either no or very less emissions, i would also like to mention the cost of buying an electric car is quite higher than a petrol or diesel car. I hope you would consider theses issues</p> <p>The electric vehicle policy states that from the 1st October 2028 <u>new taxi licences</u> will only be issued to electric vehicles. This means that vehicles licences issued between the 1st October 2025 and the 30th September 2028 will be able to renew their licences until the vehicle is 15 years old. For example, a new petrol taxi licenced on the 30th September 2028 will be eligible for renewal of its licence until the 30th September 2043, by which time infrastructure and costs will have likely changed significantly. This will allow for a phased transition to electric vehicles.</p>

One
Hackney
Carriage
Driver

From: Catlyn, Lucy <L.Catlyn@spelthorne.gov.uk>
Sent: Wednesday, August 21, 2024 5:36 PM

Thank you for your email and comments.

1. Unfortunately, we are not permitted to accept third party DBS. Please see this for information as to why: [Institute of Licensing](#) – please read the letter from the home office.
2. Please see 4.10 of the statutory standards - [Statutory taxi and private hire vehicle standards - GOV.UK \(www.gov.uk\)](#) as the DBS only covers UK offences we will always seek to safeguard the travelling public if applicants and existing drivers live abroad for a period of more than 6 months over 10 years of age. Please advise what your exact objection is to this please.
3. I am not sure what else I can advise re the electric vehicles other than that I have noted your points.

All comments need to be made on writing, I am happy to speak to you but you would need to put any comments in writing

Thanks
Lucy

Lucy Catlyn
Principal Licensing Officer
Environmental Health and Licensing

From:
Sent: Wednesday, August 21, 2024 1:30 PM
To: Licensing <licensing@spelthorne.gov.uk>; Catlyn, Lucy <L.Catlyn@spelthorne.gov.uk>
Subject: Re: FW: draft of the Hackney Carriage and Private Hire Policy 2024-2029

Hello Lucy,
I hope this email finds you well.
I would like to bring to your attention some concerns regarding the proposed changes in the policy:

1. **Non-Acceptance of Third-Party DBS Checks:** The decision to no longer accept third-party DBS checks, particularly from Surrey County Council, seems both costly and time-consuming. There has been no clear justification provided for this change, and it would be helpful to understand the reasoning behind it.

	<p>2. Lowering of Age and Time Limits for Statements of Good Conduct: The proposed reduction in the age and time limits for the statement of good conduct appears unnecessary. Again, no explanation has been given for this change, which raises concerns about its necessity and impact.</p> <p>3. Licensing of Non-Wheelchair Accessible Vehicles: The new policy suggests that licenses for non-wheelchair accessible vehicles will only be granted if the vehicle is zero-emission (electric), with no age limit. While the goal of promoting electric vehicles is commendable, it may be premature for the industry to make such a transition. Here are some specific points to consider:</p> <ul style="list-style-type: none"> ○ There are currently no zero-emission MPVs (Multi-Purpose Vehicles) available. ○ Electric vehicles require significant charging time. For a driver working a 10-hour shift, 3-4 hours of charging could be required, which is impractical for taxi drivers. ○ Even if all licensed vehicles were to be converted to electric, the impact on air quality may be minimal, given the overall number of private hire and hackney carriage vehicles in operation in the area. <p>I would greatly appreciate further clarification on these points and the opportunity to discuss them in more detail.</p> <p>The electric vehicle policy states that only from the 1st October 2028 will <u>new taxi licences</u> of wheelchair accessible Taxis be issued to ULEZ and electric vehicles. Non ULEZ compliant wheelchair accessible vehicles licenced between the 1st of October 2025 and the 30th of September 2028 will be able to renew their licences until the vehicle is 15 years old. For example, a new non-ULEZ compliant wheelchair accessible petrol taxi licenced on the 30th September 2028 will be eligible for renewal of its licence until the 30th September 2043, by which time infrastructure and costs will have likely changed significantly. This will allow for a phased transition to electric vehicles.</p>
One Hackney Carriage Driver	<p>My only comments on this draft are that the “clamp down” on medical and DBS seem punitive, especially for older drivers like myself who don’t currently know how to apply for the DBS continuous update service! I have always relied on Licensing to submit the application on my behalf to date, each one lasting three years! Perhaps you might be able to assist me once more to start the process once more, so I can then sign on to the update service (which my wife says she will help me do), as I’m informed that this can only be done from a fresh application!</p>

Appendix B

<p>One Hackney Carriage Driver</p>	<p>A few quick notes on the subjects written down.</p> <p>Most items I don't have any objection too like the paperwork and renewal/new applicant process.</p> <p>Tinted windows are a big thumbs up from me as it would make it easier to get a better vehicle with tinted windows than one without.</p> <p>I am fully against the 1st October 2028 section where unless i buy a wheelchair accessible car i have to buy an EV, i do not and will not be forced to buy an EV at a extortionate rate when the possibility of EV's are not going to be the car of the future and especially when a diesel car would take about 16 years to be more polluting than an EV from the point of manufacture (and this doesn't include the battery change at about 8-10 years at a cost of approx £10k if it hasn't caught alight by then).</p> <p>Disability awareness, county lines and others. I always treat people the way I want to be treated and help the disabled anyway...with respect as I do with the elderly. I don't personally see the need for these 'tests', reason being, I'm a taxi driver not a social worker and I'll be watching the road, not the people in the back. Common sense should come to mind in this situation. These may be better suited to driver's of school runs.</p> <p>Sorry if I sound blunt on certain things and no disrespect was intended.</p> <p>The electric vehicle policy states that only from the 1st October 2028 will <u>new taxi licences</u> be issued to electric vehicles. Vehicles licenced between the 1st October 2025 and the 30th September 2028 will be able to renew their licences until the vehicle is 15 years old. For example, a new petrol taxi licenced on the 30th September 2028 will be eligible for renewal of its licence until the 30th September 2043, by which time infrastructure and costs will have likely changed significantly. This will allow for a phased transition to electric vehicles</p>
<p>PH Driver and Operator</p>	<p>As per my conversation with Bruce today, I would like to confirm are concerns/comments as detail below in red.</p> <p>As you are well aware we Mums & Sons Ltd are a Specialist Disabled Transport operator carrying out contract work for Surrey school and Adult services, Local borough therefore not operating as a normal taxi or PH company. In the past and to date we have</p>

been issued our PH vehicle licenses with an S prior to the number therefore differentiate from the others.

I trust all is in order and await your advices

On 25/07/2024 16:23, Licensing wrote:

Dear All

At a Licensing Committee meeting held on Tuesday 23 July 2024 at Spelthorne Borough Council, members agreed to consult on a draft of the Hackney Carriage and Private Hire Policy

The document is attached & I would ask that you please reply to licensing@spelthorne.gov.uk with any comments **between 26 July 2024 and no later than 26 August 2024**. We would appreciate replies sooner if possible please

The Department for Transport (DFT) recommends in the Statutory taxi and private hire standards that all licensing authorities make publicly available a cohesive policy document that brings together all their procedures on taxi and private hire vehicle licensing. This should include but not be limited to policies on convictions, a fit and proper person test, licence conditions and vehicle standards.

The existing policy does not include the changes from the Statutory taxi and Private Hire Standards or the updated Best Practice Guidance. The policy has been rewritten to be in line with this. It is not possible to list all the changes, however the significant changes of note are: -

Summary of Key Changes: -

1. Removal of forms which are currently given out with licenses with conditions and instead have the one policy with the conditions attached. This will make the process more streamlined and easier for applicants/existing trade to understand the requirements. **Thats OK**
1. The Council will no longer issue any Private Hire (PH), Hackney Carriage or Private Hire Operator licence until all documentation has been submitted e.g. medical and DBS. **Current Procedure**
1. Relaxation of Window Tinting requirements to allow factory fitted windows. **We do run some vehicles with Limo**

	<p>tinted windows due to clients having light sensitivity epilepsy</p> <ol style="list-style-type: none"> 1. Introducing a time limit for new drivers to complete their application of six months. This is to provide clarification on the process as it has been a recurring issue where new applicants can take extensive lengths of time to complete the process and not contact the Council for months on end. Thats OK 1. Introducing clarification where current medicals are not in place that the Council may suspend the licence for public safety. Can you be proactive and inform us with ample notice that medicals are due. 1. Applicants for the grant of a vehicle licence where they are not a holder of a current driver licence issued by the Council will be required to provide a basic DBS certificate. ? 1. Removal of the requirement to carry a first aid kit and fire extinguisher. As Mums & Sons Ltd is a specialist company we will keep these on board as all our staff are First Aid trained and have had in house training on using Fire Extinguishers. 1. Drivers to register on the online DBS update service. If they fail to do so or maintain subscription during the period the licence is in force the licence may be suspended or revoked. A licence will not be granted or renewed in the absence of a current Enhanced DBS Disclosure Certificate. Should drivers not have a DBS in place there will be no 'grandfather rights'. Checks will be carried out every six months at a minimum. Due to Mums & Sons Ltd being a specialist operator we currently have to have full enhanced DBS checks with Surrey CC and all drivers are fully registered to the DBS update service which can be accessed by yourselves. We would be happy to give your permission to carry out this service via written confirmation and providing an access code. 1. No longer accepting third party DBS's completed for other job roles e.g. Surrey School runs. Please see above 1. Lowering of age and time limits for statement of good conducts. These will now be required if the applicant has spent three or more continuous months living outside the UK (previously six months). This will be from age 10 (previously as an adult).¹ Thats OK
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	<p>1. Disability awareness training. Refresher training will be required every three years. All existing drivers to complete this by 1 October 2025. New Drivers will need to complete. As we are specialist disabled transport operators we currently have Disability awareness training along with Epilepsy training for all staff and a refresher course is also carried out every 3 years.</p> <p>1. New and existing drivers to complete safeguarding, child sexual abuse and exploitation and county lines training. Existing Drivers to complete refresher training every three years – all existing drivers to retake this by 1 October 2025. As per the above we also carry out a full and certificated Safeguarding course which is refreshed every 3 years</p> <p>1. New and existing drivers to undertake training and/or assessment focussed on attitudes and behaviours. Existing Drivers to complete refresher training every three years – all existing drivers to complete this by 1 October 2025. As Mums & Sons Ltd are specialist and carry out contracts with Surrey CC all our staff are vetted and monitored throughout our contract periods and are issued with a Surrey CC Blue Badge confirming they are fit and appropriate to carry out their duties.</p> <p>1. Update to policy and penalty points to notify the Council, in writing, of any motoring or criminal convictions within 48 hours of conviction or caution during period of current licence. Thats OK</p> <p>1. Introduction of 12 penalty points for failure of hackney carriage driver, private hire driver to provide a pass certificate in respect of Disability awareness training and/or Driver conduct, attitude, and behaviour training by 1 October 2025. As per the above this is already in place</p> <p>1. New Convictions policy in line with statutory guidance and Institute of Licensing guidance. “Where an applicant has seven or more points on their DVLA licence for minor traffic or similar offences, a licence will not be granted until at least five years have elapsed since the completion of any sentence imposed.”² Thats OK</p> <p>1. Revision of emissions policy. We currently have a 10-year age limit for non-wheelchair accessible and 12 for wheelchair accessible. If a driver currently has a ULEZ compliant car then their age limit of when it will be last licensed will now be extended to 15 years old. As all of our vehicles are specially made to our specification and</p>
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wheelchair accessible we have always had an extra discretionary years that are added on a vehicle to vehicle basis. I would like to think this still would be the case, as our vehicles are purchased from new and carryout limited mileage within there working life.

To further support the uptake of Ultra- Low and Zero Emission vehicles, there is no minimum engine size for hybrid/LPG, electric or other alternatively powered vehicles.

Further information is detailed at **Appendix B.**

From 1 October 2025	From 1 October 2028	From 1
New - will only be granted to ULEZ compliant vehicles. The maximum a license will be granted is when the vehicle is 15 years old.	New non-wheelchair accessible vehicle- licence will only be granted if the vehicle is zero emissions (electric) with no age limit	New wh accessible granted electric vehicles a licens is when years o
Renewal of currently licensed vehicles at the time of this policy being adopted - The maximum a license will be granted is when the vehicle is 15 years old.	Renewal of currently licensed vehicles at the time of this policy being adopted - The maximum a license will be granted is when the vehicle is 15 years old which must be ULEZ compliant	Renewa accessi maximu be gran vehicle which m complia

Many thanks

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