

<b>REPORT:</b>	Regulatory Committee
<b>DATE:</b>	9 October 2024
<b>REPORTING OFFICER:</b>	Director – Legal and Democratic Services
<b>PORTFOLIO:</b>	Resources
<b>SUBJECT:</b>	Taxi Licensing Policy Amendments
<b>WARDS:</b>	Borough-wide

## 1. PURPOSE OF REPORT

- 1.1. To consider additions and amendments to the Councils Taxi Licensing Policies.

## 2. RECOMMENDATION that

- 2.1. **The Committee considers the proposals and makes appropriate recommendations to the Executive Board.**

## 3. BACKGROUND

- 3.1. Recently the taxi trade has asked for several amendments to be made to the Taxi Licensing Policies. The request has been on the following points.
  - Age of vehicles
  - Card Readers
  - Colour of purpose-built vehicles
  - Spare wheel/space saver
  - Fire Extinguishers
  - Age of electric vehicles
- 3.2. According to the Council's Constitution the Committee is responsible for determining policies in connection with the grant, variation, suspension or revocation of licences relating to taxi and private hire.
- 3.3. However, the Constitution must now be interpreted in accordance with the case of R (On the application of 007 Stratford Taxis Limited v Stratford on Avon District Council 2011. This Court of Appeal decision interpreted the meaning of the Local Authorities (Functions and Responsibilities)(England) Regulations 2000 in respect of matters which must be dealt with by a Council's Executive or by a committee of its council. Essentially, the court held that: (1) it was clear that individual applications relating to taxi matters must be dealt with by the equivalent of this Council's Regulatory Committee and (2) matters calculated to facilitate, or be conducive or incidental to such applications must also be dealt with in the same way but (3) any "plan or strategy" associated with such a function would be an executive function and therefore have to be determined by a Council's Executive. The Stratford case concerned the introduction of a wheelchair access policy. The decision was taken by the Council's Cabinet rather than its Licensing Committee. The challenge from the

taxi trade was that the Licensing Committee should have adopted the policy. This element of the challenge was rejected by the Court.

3.4. Consequently, any decision of the Regulatory Committee on matters contained in this agenda will be by recommendation to the Executive Board.

3.5. In deciding whether to recommend the adoption of a policy the following questions should be addressed:-

3.5.1 Has a proper consultation been undertaken where the duty arises?

3.5.2 Are the proposals necessary and proportionate?

## 4. POTENTIAL AMENDMENTS

### Amendment 1 – Age of Vehicles

4.1 The Councils current policy on age limits of licensed vehicles are:

#### non fully wheelchair accessible vehicles

can be no more than 5 years old when first licensed and the maximum age is 10 years old.

#### Fully wheelchair accessible vehicles

Can be no more than 13 years old when first licensed and the maximum age limit is 16 years old.

4.2 Members will recall a temporary extension was granted for a period of two years with effect from the 25 February 2023, this is due to expire on the 25 February 2025, this temporary extension does not cover the whole of the trade it only covered qualifying vehicles that were coming up to the maximum age during the period.

4.3 The trade has asked for a review of the vehicle age policy due to the cost-of-living crisis and the price of replacing vehicles.

4.4 A review of the Liverpool City Region vehicle age policies has been undertaken, with Wirral Council being the most recent Authority to have adopted a new policy in June 2024, attached at **Appendix A** is the vehicle policy criteria.

4.5 Recent discussions within the Liverpool City Region have been taking place over the last few months with consideration being given that all the authorities within the region, are to adopt a standardised approach with a number of conditions and policies, the vehicle age policy is one of the policies that has recently been discussed. Research has found that most of the region already have similar criteria in place in relation to the age of vehicles.

4.6 In October 2015, the Deregulation Act 2015 made amendments to the Local Government (Miscellaneous Provisions) Act 1976 to allow a Private Hire Operator to subcontract a booking to another Private Hire Operator irrespective of where they are licensed. This practice is often referred to as “Cross Border Hiring”. The effect of

this deregulation is that vehicles with different criteria can operate across many different authorities. It is only in recent years, that the amendment to the legislation has had an impact on the operation of the licensed vehicles in Halton. Licensing Officers are witnessing increasing concern from drivers licensed by Halton in respect of the number of vehicles that operate in Halton but are licensed by other licensing authorities who have different criteria for licensing vehicles, and this includes age of vehicles. It is reported that individuals are seeking to have their vehicles licensed by other authorities as they are finding it difficult to obtain vehicles that will comply with the current criteria for licensing vehicles in Halton Borough Council. Should an individual wish to have a licensed vehicle licensed by another licensing authority, in order to be able to drive that vehicle the individual must also obtain a driver's licence from that authority and work for an operator who has a licence in that authority. The consequences of this are that both the drivers and vehicles can operate in Halton under the conditions and criteria set by another licensing authority.

## PROPOSAL

- 4.7 The temporary amendment – which permits an extension of the time limit for two years - is due to expire on the 25 February 2025 as the economic circumstances have not improved with the current cost of living crisis. The trade has requested that the whole of the vehicle age policy be reviewed.
- 4.8 In determining whether the policy should be reviewed, or an additional temporary amendment should be extended, the following considerations should be considered.
- Replacing a licensed vehicle on attaining current age limit could in the current time of austerity be punitive to the proprietor and place unreasonable financial and/or personal pressure on the licence holders.
  - Removing the conditions in their entirety could lower the standards achieved in the Borough since age restrictions were introduced to, the detriment of the service to which the public are entitled.
  - Any additional extension that may be granted would only benefit a small percentage of the trade whose vehicles reach the current maximum age in the next year or two. Even those licence holders who may benefit from any temporary extension to the current policy, may not necessarily take advantage of the any potential rule change and may choose to obtain a newer vehicle anyway.
  - The committee will also need to have regard to the consultation outcomes, the most recent publication of the DfT Best Practice Guidance, as well as the criteria for licensing vehicles in neighbouring authorities in the City Region as well as other licensing authorities. If it is considered that there should be no change to the current policy, vehicle proprietors may seek to have their vehicles licensed in other authorities where the criteria do not restrict vehicles in terms of their age. Attached at **Appendix B** is the relevant sections from the guidance.
  - The legislation gives licensing authorities a wide range of discretion over types of vehicles that they can licence as Hackney Carriage or Private Hire Vehicles. This is recognised in the DfT Best Practice Guidance which states:  
*“individual licensing authorities are still responsible for deciding their own policies and making decisions on individual licensing matters applying the relevant law and any other relevant considerations. This guidance is primarily intended to assist licensing authorities, but it is only guidance and does not intend to give a definitive statement of the law: any decisions made by an authority remain a matter for that authority”*

## CONSULTATION

- 4.9 The trade was consulted on the 10 June 2024 by email and the question was asked - should the age of vehicle be increased.
- 4.10 There were 111 replies to the consultation, which have provided the following information:
- 52 replies are in favour of the change
  - 52 replies are not in favour of the change
  - 7 replies made no comment
- 4.11 The findings with comments were collated and can be found at **Appendix C**.
- 4.12 The public have also been consulted via the Council website on the same question, no comments were received.

## 5. OPTIONS

- 5.1 The options available to the Committee are to recommend:
- Maintain current policy and readopt the 2-year extension time limit to 25 February 2027 or
  - Maintain current policy, but allow the extension time limit to expire on 25 February 2025 or
  - Adopt the same policy as other authorities in the Liverpool City Region or
  - Remove the minimum age requirement from 5 years to 7 for a standard vehicle and maximum from 10 to 12 years and keep the minimum age of 13 years for wheelchair accessible but increase the maximum to 18. With the same testing conditions as two a year
- 5.2 The Committee are asked to recommend one of the above options to the Executive Board for adoption.
- 5.3 In the event that policy is changed powers will need to be delegated to the Licensing Manager to settle wording of the policy.

## 6. POTENTIAL AMENDMENTS

### Amendment 2 – Card Readers

- 6.1 There is currently no condition within the vehicle policy to have card readers in a licensed vehicle.
- 6.2 A request was made by one of the Private Hire Operators that this should be reviewed by the Licensing Department.

## PROPOSAL

- 6.3 Should this proposal be reviewed in line with the Liverpool City Region, it may be noted that there are no other authorities within the city region that makes it mandatory to have a card reader in the vehicles.

6.4 Adding this to the vehicle licence conditions will add an additional cost for drivers licensed by Halton.

## **CONSULTATION**

6.5 The trade was consulted on the 10 June 2024 by email and the following question was asked - should it be a condition that Hackney Carriage and Private Hire Vehicles have card readers in the vehicle?

6.6 There were 111 replies to the consultation, which have provided the following information:

- 26 replies are in favour of the change
- 80 replies are not in favour of the change
- 5 replies made no comment

6.7 The findings with comments were collated and can be found at **Appendix C**.

6.8 The public have also been consulted via the Council's website on the same question, no comments were received.

## **7. OPTIONS**

7.1 The options available to the Committee are to recommend:

- Require a Card Reader for all new vehicles from .... and all vehicles currently licensed from .....or
- Do not require a Card Reader

7.2 The Committee are asked to recommend one of the above options to the Executive Board for adoption.

7.3 In the event that policy is changed powers will need to be delegated to the Licensing Manager to settle wording of the policy.

## **8. POTENTIAL AMENDMENTS**

### **Amendment 3 – Colour of Purpose-built vehicles (Wheelchair accessible)**

8.1 The current vehicle conditions are as follows

#### **Hackney Carriage**

Be painted black except where the vehicle is a London style vehicle where it can be any solid colour

#### **Private Hire**

Painted any colour other than black

- 8.2 A request was made by the trade to remove the colour on purpose-built vehicles (Fully Wheelchair Accessible Vehicles) due to the cost of replacing the vehicles. Comments have been made that the cost of purchasing a black vehicle is a lot more expensive than purchasing one in any other colour.
- 8.3 The DfT guidance states on colour of vehicles  
*Licensing authorities should not impose a livery requirement on private hire vehicles. The more distinctive a private hire vehicle is made to appear, the greater the chance that this might be confused with a taxi. **To assist the differentiation further, licensing authorities which require taxis to be a particular colour should prevent private hire vehicles from being that same colour, unless they are easily identifiable i.e. they are purpose-built vehicles as is the case in many of our cities.***
- 8.4 Residents of Halton are fully aware of the colour of licensed vehicles in Halton and if this was to be changed it could lead to confusion with the public.
- 8.5 In October 2015, the Deregulation Act 2015 made amendments to the Local Government (Miscellaneous Provisions) Act 1976 to allow a Private Hire Operator to subcontract a booking to another Private Hire Operator irrespective of where they are licensed. This practice is often referred to as “Cross Border Hiring”. The effect of this deregulation is that vehicles with different criteria can operate across many different authorities. It is only in recent years, that the amendment to the legislation has had an impact on the operation of the licensed vehicles in Halton. Licensing Officers are witnessing increasing concern from drivers licensed by Halton in respect of the number of vehicles that operate in Halton but are licensed by other licensing authorities who have different criteria for licensing vehicles, and this includes colour of vehicles. It is reported that individuals are seeking to have their vehicles licensed by other authorities as they are finding it difficult to obtain vehicles that will comply with the current criteria for licensing vehicles in Halton Borough Council. Should an individual wish to have a licensed vehicle licensed by another licensing authority, in order to be able to drive that vehicle the individual must also obtain a driver's licence from that authority and work for an operator who has a licence in that authority. The consequences of this are that both the drivers and vehicles can operate in Halton under the conditions and criteria set by another licensing authority.

## CONSULTATION

- 8.6 The trade was consulted on the 10 June 2024 by email and the following question was asked - should the colour of purpose-built vehicles be changed?.
- 8.7 There were 111 replies to the consultation, which have provided the following information:
- 23 replies are in favour of the change
  - 27 replies are not in favour of the change
  - 61 replies made no comment
- 8.9 The findings with comments were collated and can be found at **Appendix C**.
- 8.10 The public have also been consulted via the Councils website on the same question, no comments were received.

## 9. OPTIONS

- 9.1 The options available to the Committee are to recommend:
- Maintain current policy or
  - Change policy in specified respects.
- 9.2 The Committee are asked to recommend one of the above options to the Executive Board for adoption.
- 9.3 In the event that policy is changed powers will need to be delegated to the Licensing Manager to settle wording of the policy.

## 10. POTENTIAL AMENDMENTS

### **Amendment 4 – Spare Wheel/Space Saver**

- 10.1 The current vehicle conditions are as follows
- When driving a licensed Hackney Carriage or Private Hire Vehicle equipped with a space saver tyre the holder must be aware of and adhere to the VOSA requirements for the use of space saver tyres.*
- 10.2 A request was made by the trade to remove the conditions for a spare wheel/space saver. The request was due to when drivers are purchasing new vehicles, manufacturers do not provide a spare wheel or space saver they now only provide the manufacturer tyre kit (tyre foam).
- 10.3 Officers have reviewed the conditions within neighbouring authorities, and it is noted some authorities do allow tyre sealant as part of the vehicle condition.
- 10.4 Comments have been received from the Councils Lowerhouse Lane Depot that they would have concerns regarding how they would continue their journey, and this could be an issue regarding passenger safety.

## CONSULTATION

- 10.5 The trade was consulted on the 10 June 2024 by email and the following question was asked – should the condition for space saver/spare wheel be removed
- 10.6 There were 111 replies to the consultation, which have provided the following information:
- 78 replies are in favour of the change
  - 18 replies are not in favour of the change
  - 15 replies made no comment
- 10.7 The findings with comments were collated and can be found at **Appendix C**.

10.8 The public have also been consulted via the Councils website on the same question, no comments were received.

## **11. OPTIONS**

11.1 The options available to the Committee are to recommend:

- Keep the requirement for a space saver/spare wheel in the vehicle as per current policy or
- Remove the current policy requirement for a space saver/spare wheel in the vehicle (with the implications that the manufacturers specification applies).

11.2 The Committee are asked to recommend one of the above options to the Executive Board for adoption.

11.3 Should the Committee recommend any of the changes to the Policy then they will need to be altered. The Committee would therefore be requested to include within the resolution a delegation of the task of preparing detailed wording and other consequential matters to the Licensing Managers.

## **12. POTENTIAL AMENDMENTS**

### **Amendment 5 – Fire Extinguishers**

12.1 The current vehicle conditions are as follows

*A fire extinguisher shall be maintained within the vehicle in a position approved by the Council. The extinguisher shall comply with BSEN3 1996, bear a K mark and licence number and have a gauge. The extinguisher shall be subject to annual test by a qualified tester and the test certificate shall be produced to the Council when the vehicle tested by the Council.*

*The fire extinguisher shall be permanently marked with the vehicle registration number and/or plate number.*

12.2 A request was made to remove this condition due to not being required any longer, as it was not felt safe for a driver to return to a vehicle if it was on fire.

12.3 Officers have reviewed the conditions within neighbouring authorities, who do not have this condition as part of their policy.

12.4 Officers have contacted Cheshire Fire regarding this condition, and the replied received was that they could make no comment on this condition.

12.5 Comments have been received from the Councils Lowerhouse Lane Depot that fire extinguishers are a fire safety support, and all Halton Borough Councils fleet vehicles carry a fire extinguisher.

## **CONSULTATION**

12.6 The trade was consulted on the 10 June 2024 by email and the following question was asked – should the condition for fire extinguishers be removed

There were 111 replies to the consultation, which have provided the following information:

- 30 replies are in favour of the change
- 21 replies are not in favour of the change
- 60 replies made no comment

12.7 The findings with comments were collated and can be found at **Appendix C**.

12.8 The public have also been consulted via the Councils website on the same question, no comments were received.

### **13. OPTIONS**

13.1 The options available to the Committee are to recommend:

- Keep the requirement for a fire extinguisher in the vehicle as per current policy or
- Remove the current policy requirement for a fire extinguisher in the vehicle

13.2 The Committee are asked to recommend one of the above options to the Executive Board for adoption.

13.3 In the event that policy is changed powers will need to be delegated to the Licensing Manager to settle wording of the policy.

### **14. POTENTIAL AMENDMENTS**

#### **Amendment 6 – age of electric vehicles**

14.1 The current vehicle conditions regarding Electric Vehicles are the same as the current age restrictions as set out in paragraph 4.1 of this report.

14.2 A request was made by the trade that the age of Electric Vehicles should be allowed to be licensed for a longer period than the current vehicle age conditions due to the financial cost of purchasing a new vehicle.

14.3 Officers have reviewed the conditions within neighbouring authorities, and they do not have a age policy specifically for Electric Vehicles.

### **CONSULTATION**

14.6 The trade was consulted on the by email and the following question was asked - should the age of Electric Vehicles be amended.

14.7 There were 111 replies to the consultation, which have provided the following information:

- 30 replies are in favour of the change
- 8 replies are not in favour of the change
- 73 replies made no comment

14.8 The findings with comments where collated and can be found at **Appendix C**.

4.9 The public have also been consulted via the Councils website on the same question, no comments were received.

## **15. OPTIONS**

15.1 The options available to the Committee are to recommend:

- Maintain current policy with no difference between licensing conventional and electric vehicles or
- Electric vehicles to have a different age limit as specified.

15.2 The Committee are asked to recommend one of the above options to the Executive Board for adoption.

15.3 In the event that policy is changed powers will need to be delegated to the Licensing Manager to settle wording of the policy.

## **16. REGULATORS' CODE 2014**

16.1 The Regulators' Code 2014 requires regulators (such as the Council) to take into account a number of factors when introducing new policies.

16.2 For example, paragraph 1.2 of the Code states: "When designing and reviewing policies, operational procedures and practices, regulators should consider how they might support or enable economic growth for compliant businesses and other regulated entities, for example, by considering how they can best:

- understand and minimise negative economic impacts of their regulatory activities;
- minimising the costs of compliance for those they regulate;
- improve confidence in compliance for those they regulate, by providing greater certainty; and
- encourage and promote compliance."

16.3 The Code also states that regulators should base their regulatory activities on risk. In the present case the balancing exercise is to weigh any negative consequences on the taxi trade against the positive consequences on the public who use the services of the trade.

16.4 It is taken as read that unnecessary burdens should never be imposed and that all actions need to be proportionate.

## **17. POLICY IMPLICATIONS**

17.1 Any changes made to in relation to the above sections of this report would impact upon existing policies and possibly standards of Hackney Carriage and Private Hire Vehicles Licensed by Halton Borough Council.

17.2 Any changes made would change elements of existing policy and vary Conditions relating to applicants applying to hold Single Status Driver's and Private Hire Operator's Licences issued by Halton Borough Council.

## **18. OTHER IMPLICATIONS**

There are no other implications arising out of this report.

## **19. IMPLICATIONS FOR THE COUNCIL'S PRIORITIES**

### **19.1. Improving Health, Promoting Wellbeing and Supporting Greater Independence**

None

### **19.2. Building a Strong, Sustainable Local Economy**

None

### **19.3. Supporting Children, Young People and Families**

None

### **19.4. Tackling Inequality and Helping Those Who Are Most In Need**

None

### **19.5. Working Towards a Greener Future**

None

### **19.6. Valuing and Appreciating Halton and Our Community**

None

## **20 RISK ANALYSIS**

N/A

## **21 EQUALITY AND DIVERSITY ISSUES**

There are no equality and diversity issues to highlight.

## **22 CLIMATE CHANGE IMPLICATIONS**

There are no climate change implications since the decision will have no effect on the environment.

## **23 LIST OF BACKGROUND PAPERS UNDER SECTION 100D OF THE LOCAL GOVERNMENT ACT 1972**

**Document**

**Place of Inspection**

**Contact Officer**

<b>Document</b>	<b>Place of Inspection</b>	<b>Contact Officer</b>
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Taxi Consultative Group Agenda	Licensing Section	Kim Hesketh
Current licence conditions/policies		Kim Hesketh
Taxi consultation file		Kim Hesketh

# HACKNEY CARRIAGE VEHICLE LICENCE

## CRITERIA

**JUNE 2024**

# Hackney Carriage Vehicle Criteria

In this document the "Licensing Authority" means Wirral Council, its Regulatory and General Purposes Committee, its Licensing Panel and its Officers.

Although the criteria set out in this document may have been met, approval for the issuing of a licence may be withheld if the Licensing Authority is of the opinion that the vehicle is unsuitable for use as a Hackney Carriage Vehicle to transport members of the public for hire and reward.

Although the Licensing Authority may extend its approval of any particular type of vehicle to all other vehicles conforming to the design of that type, the Licensing Authority may withdraw such general approval if, in their opinion, any unsuitable features arise.

The criteria set out in this document are made under Section 47 of the Local Government (Miscellaneous Provisions) Act 1976.

A vehicle that meets the criteria to be licensed as a Hackney Carriage Vehicle must have passed the MOT and Compliance Test in accordance with the Licensing Authority's procedure for testing vehicles before it can be licensed and before each renewal of that licence. Further tests and inspections may be carried out as directed by the Licensing Authority or Merseyside Police.

MOT or Compliance Test Pass Certificates submitted more than 28 days after the date of test will not be accepted.

A vehicle licensed as a Private Hire Vehicle or Hackney Carriage Vehicle with any other Local Authority will not be licensed by Wirral Council.

## VEHICLE EMISSION STANDARDS AND AGE POLICY

1. A vehicle presented for the grant of a Hackney Carriage Vehicle Licence with Wirral Council must have been compliant with **Euro 5** emission standards at the date of first registration.
2. A vehicle that is **11 years** of age or more from the date of first registration will be subject to a **licence of no more than 6 months** and will therefore be required to pass an MOT and Compliance test every 6 months.
3. A vehicle that reaches 11 years of age before the expiry of a current licence will be issued with a licence of no more than 6 months in accordance with the criteria set out in paragraph 2 above.

## GENERAL CONSTRUCTION

4. The vehicle must be fitted with at least 4 doors and 4 wheels.
5. The vehicle must be capable of carrying at least 4 and not more than 8 passengers in addition to the driver.
6. In addition to the front driver and passenger doors, the vehicle must be fitted with at least two side/rear opening doors.
7. All vehicles must be purpose built and built to accommodate disabled passengers whilst seated in a wheelchair in the rear passenger compartment.
8. Any vehicle to be licensed as a Hackney Carriage Vehicle must be a side loading wheelchair accessible vehicle.
9. The vehicle must hold European Community Whole Vehicle Type Approval (ECWVTA) or GB Vehicle Type Approval category M1. A vehicle that does not hold M1 type approval must be

presented with approved certification that the specific vehicle meets the requirements of M1 category.

10. All vehicles must have separate driver and rear passenger compartments, separated by a transparent partition in accordance with the manufacturer or vehicle converter's original specification.
11. The vehicle must comply with the Road Vehicles (Construction and Use) Regulations 1986 and any subsequent amendment or re-enactment thereof.
12. The steering wheel must be on the offside of the vehicle.
13. Unless approved by the Licensing Authority no fittings outside of the manufacturer's or vehicle converter's specification may be attached to or be carried upon the inside or outside of the vehicle.

## **BODYWORK**

14. The vehicle must be free from corrosion, damage, or unsatisfactory repairs.
15. Paintwork must be of a high standard and the colour and finish of all panels must match exactly.

## **WHEELS**

## **AND**

## **TYRES**

16. Where a vehicle is fitted with alloy wheels, all four road wheels must be of the same type and pattern.
17. Where a vehicle is fitted with wheels intended to be fitted with wheel trims, all four road wheels must be fitted with wheel trims of the same pattern.
18. Alloy wheels, wheel rims, and fitted wheel trims must be free from damage and defects which affect the safety, appearance, or integrity of the wheel.
19. Part-worn and remould tyres must comply with the Motor Vehicle Tyres (Safety) Regulations 1994.
20. Vehicles must not be fitted with tyres that are more than ten years old.
21. All tyres, including the spare where applicable must be the correct size, speed, and load rating for the vehicle as per the manufacturer's specification, and be compatible with the taximeter.
22. All tyres, including the spare where applicable, must be properly inflated in accordance with both the vehicle and tyre manufacturer's specifications.
23. All tyres must have a continuous tread depth of at least 1.6mm across the central three quarters of the breadth of the tyre, and visible tread across the remaining breadth of the tyre.
24. All tyres, including the spare, where applicable, must be free from cuts and other defects.
25. The Hackney Carriage Vehicle must carry a method for dealing with a wheel or tyre should it become defective. This method must be in accordance with the vehicle manufacturer's specification which must be one of the following:
  - a. **full size spare wheel** - which must be the same size and type as the four road wheels and be fitted with a tyre of the same size, speed, and load rating as the four road wheels. Proper tools and equipment for changing the wheel must also be carried

- b. **space saver spare wheel** - which must be the correct size and type for the vehicle and be fitted with a tyre of the correct size, speed, and load rating. The tyre must be correctly inflated in accordance with the manufacturer's specifications. Proper tools and equipment for changing the wheel must also be carried.
- c. **run-flat tyres** - which must be fitted to all four road wheels. Run-flat tyres may only be used if the vehicle is fitted with an appropriate and serviceable tyre pressure monitoring system (TPMS).
- d. **emergency tyre sealant and compressor/inflator pack** – which must be permanently marked with the vehicle registration number.

#### **INTERIOR LIGHTING**

- 26. Lighting must be provided for the driver and passengers.
- 27. Separate lighting controls for both passenger and driver must be provided.
- 28. Passenger compartment light switches and window controls must be within easy reach of all passengers.
- 29. In the case of the passenger compartment, an illuminated control switch must be fitted.
- 30. Lighting must be provided at floor level to each passenger door and be activated by the opening of the doors.

#### **SEATS**

- 31. Seats must be secure and covered with an appropriate material which must be properly upholstered and in good and clean condition, free from rips, tears and holes.
- 32. If seat covers are used they must be correctly fitted, in a good and clean condition and free from rips, tears and holes.

#### **SEAT BELTS**

- 33. Vehicles must be fitted with lap and diagonal seatbelts on all seats, including rear facing seats, as per the manufacturer or vehicle converter's specification.
- 34. Seatbelts and seatbelt mechanisms must be in good working order and free from frays, cuts, and other damage.
- 35. If a seatbelt sustains any frays, cuts, or other damage the seatbelt must be replaced – not repaired.

#### **DRIVER COMPARTMENT**

- 36. Vehicles must be provided with a means of communication between the passenger and the driver.
- 37. Vehicles must be fitted with an induction loop system.

#### **PASSENGER COMPARTMENT**

- 38. Occasional seats must automatically rise when not in use.
- 39. The rear seat dimensions must be adequate to carry the appropriate number of adult passengers comfortably.
- 40. Suitable means must be provided to assist persons to rise from the rear seat with particular

attention to the needs of elderly and disabled persons.

41. Colour contrasting grab handles must be placed at door entrances to aid passenger access to and egress from the vehicle.
42. Colour contrasting sight patches are required on all passenger seats.

### **WHEELCHAIRS & RAMPS**

43. Vehicles must be built to accommodate disabled passengers whilst seated in their wheelchair and must be so equipped in order that disabled passengers in a wheelchair may be carried comfortably and safely.
44. A ramp for the loading of a wheelchair and the occupant must be made available at all times for the safe loading and unloading of passengers.
45. Any passenger ramp that was not fitted to the vehicle at the time of manufacture must comply with BS 6109-2:1989 and have a minimum safe working load (S.W.L.) of 250kg for the loading of a wheelchair and occupant.
46. Anchorages must be provided for the wheelchair and occupant. Anchorages must be either chassis or floor linked.
47. Restraints must be provided for wheelchairs and occupants which must be independent of each other.
48. Anchorages must also be provided for the safe stowage of wheelchairs when not in use, whether folded or otherwise.
49. An adequate locking device must be fitted to ensure that the ramp(s) do not slip or tilt when in use.
50. The surface of the ramp must be covered with a non-slip material.
51. The edges of the ramp's surface must be marked in a high-contrast colour scheme.
52. Ramps which are not permanently fixed to the vehicle must be permanently marked with the vehicle registration number.

### **ENTRANCE STEP**

53. The outer edge of the floor at each entrance must be fitted with non-slip high-visibility treads.
54. The top tread for any entrance must not exceed 38 cm above ground level when the vehicle is un-laden, except as detailed in criteria 55.
55. Where the top tread for the entrance exceeds 38 cm then an intermediate step must be provided at each entrance into the passenger compartment. The intermediate step must not extend outwards beyond the vertical line of the vehicle's wing mirrors. The step must be covered with a suitable non-slip surface with the edges of the step highlighted yellow.

### **WINDOWS**

56. Windows must be provided at the sides and at the rear of the vehicle.

57. Passenger door windows must be capable of being easily opened by passengers when seated. The control for opening a door window must be clearly identified so as not to be mistaken for any other control.
58. The front windscreen must allow at least 75% of light through, the front side windows must allow at least 70% of light through and the windows rear of the B-pillar must allow a minimum light transmission of 30%.
59. No windows or glass fitted to the vehicle may have been subject to an enhanced film / after-market tinting post manufacture.

## HEATING AND VENTILATION

60. A heating and ventilation system must be provided for the driver and passengers with independent controls for the driver and passengers and must be in good working order.

## DOORS

61. Where hinged doors are fitted:
  - a. An automatic locking device must be fitted to passenger doors.
  - b. When the vehicle is stationary, the passenger doors must be capable of being opened from the inside and outside of the vehicle by one operation of the latch mechanism.
  - c. The interior door handle must be clearly visible, of a contrasting colour to the interior of the vehicle, and easily accessible to passengers when the door is in the fully open or closed position.
  - d. A hinged door must be capable of being opened to a minimum angle of 90 degrees.
62. Where sliding doors are fitted:
  - a. An automatic locking device must be fitted to passenger doors.
  - b. When the vehicle is stationary, the passenger doors must be capable of being opened from the inside and outside of the vehicle by one operation of the latch mechanism.
  - c. The interior door handle must be clearly visible, of a contrasting colour to the interior of the vehicle, and easily accessible to passengers when the door is in the fully open or closed position.
  - d. There must be reflective strips on both the front and rear edges of the door.
  - e. There must be an illuminated sign bearing the words "Door Open" clearly visible from the rear of the vehicle. This sign must be automatically linked to the passenger doors in order that when either door handle is activated to open the door, the sign is illuminated.
  - f. There must be a sign within the passenger compartment, clearly visible to all passengers, giving instructions on the correct operation of the passenger door.
  - g. An audible or visual warning must be fitted in the driver's compartment indicating when any door is open.
63. Where electric doors are fitted:
  - a. A sign must be clearly displayed inside the vehicle providing instructions on the correct operation of the door opening and closing mechanism.

- b. The door system design shall incorporate a method to detect an obstruction in the path of a closing door. When an obstruction is detected, the door system shall react in a manner that will allow the obstruction to be released
- c. A method for detecting an obstruction and preventing the closure of a powered door shall be included as part of the design of the door controls.

### **INTERIOR LIGHTBOX**

- 64. A lightbox must be exhibited in a prominent position within the vehicle.
- 65. The lightbox must display the word 'CAB' in uppercase letters and the vehicle licence number below it.
- 66. The lightbox must be wired to the ignition so that it will remain lit at all times the vehicle ignition is turned on.

### **FLOOR COVERING**

- 67. The floor of the vehicle must be covered in an appropriate non-slip material which can be easily cleaned.
- 68. The floor covering must not impede the movement of wheelchairs.

### **LUGGAGE**

- 69. There must be provision for the safe carrying of luggage commensurate with the number of passengers being carried in the vehicle.
- 70. Provision must be made for luggage to be kept separate and secured from the passenger seating area.

### **TAXIMETER**

- 71. A taximeter must be fitted to the vehicle, calibrated, and sealed to show the current tariffs set by the Licensing Authority.

### **EXTERIOR ROOF LIGHT**

- 72. An illuminated roof-sign displaying the word 'TAXI' must be securely fitted to the roof of the vehicle in such a position that it is clearly visible from the front of the vehicle by day and night.
- 73. The roof-sign must be connected to the taximeter so that when the vehicle is available for hire the sign is illuminated and it is not illuminated when hired.



# **PRIVATE HIRE VEHICLE LICENCE**

## **CRITERIA**

**JUNE 2024**

# Private Hire Vehicle Criteria

Legislation gives local authorities a wide discretion over the types of vehicles that can be licensed as Private Hire Vehicles.

In this document the “Licensing Authority” means Wirral Council, its Regulatory and General Purposes Committee, its Licensing Panel, and its Officers.

The Licensing Authority must be satisfied that vehicles licensed by them as Private Hire Vehicles are suitable in type, size, and design for use as Private Hire Vehicles, that the vehicle is in a suitable mechanical condition and is safe and comfortable.

Although the criteria set out in this document may have been met, approval for the issuing of a licence may be withheld if the Licensing Authority is of the opinion that the vehicle is unsuitable for use as a Private Hire Vehicle to transport members of the public for hire and reward.

Although the Licensing Authority may extend its approval of any particular type of vehicle to all other vehicles conforming to the design of that type, the Licensing Authority may withdraw such general approval if, in their opinion, any unsuitable features arise.

A vehicle that meets the criteria to be licensed as a Private Hire Vehicle must have passed the MOT and Compliance Test in accordance with the Licensing Authority’s procedure for testing vehicles before it can be licensed and before each renewal of that licence. Further tests and inspections may be carried out as directed by the Licensing Authority or Merseyside Police.

MOT or Compliance Test Pass Certificates submitted more than 28 days after the date of test will not be accepted.

A vehicle licensed as a Private Hire Vehicle or Hackney Carriage Vehicle with any other Local Authority will not be licensed by Wirral Council.

## VEHICLE EMISSION STANDARDS AND AGE POLICY

1. A vehicle presented for the grant of a Private Hire Vehicle Licence with the Licensing Authority must have been compliant with **Euro 6** emission standards at the date of first registration.
2. A vehicle that is **8 years** of age or more from the date of first registration will be subject to a **licence of no more than 6 months** and will therefore be required to pass an MOT and Compliance test every 6 months.

3. A vehicle that reaches 8 years of age before the expiry of a current licence will be issued with a licence of no more than 6 months in accordance with the criteria set out in paragraph 2 above.

## **GENERAL CONSTRUCTION**

4. The vehicle must be fitted with at least 4 doors and 4 wheels.
5. The vehicle must be capable of carrying at least 4 and not more than 8 passengers in addition to the driver.
6. In addition to the front driver and passenger doors, the vehicle must be fitted with at least two side/rear opening doors.
7. A vehicle with a top tread for the entrance which exceeds 38cm from the ground must be fitted with a step to allow easy access into and egress from the vehicle. Any vehicle that does not have a step fitted must carry a portable step to be available for passengers. Both a fitted and portable step must be robust to carry the weight of a passenger and covered with a non-slip surface. The step height must be no more than 38cm from the ground. The driver of the vehicle must risk assess the use of a portable step on each occasion it is requested by a passenger.
8. Any vehicle to be licensed as a Private Hire Vehicle that is wheelchair accessible and is a rear loading wheelchair accessible vehicle may only be used to undertake school contract work and must load the wheelchair using a tailgate system.
9. The vehicle must hold European Community Whole Vehicle Type Approval (ECWVTA) or GB Vehicle Type Approval category M1.
10. Any converted vehicles will be required to hold the appropriate low volume type approval certificate in the M1 classification or the appropriate Individual Vehicle Approval (IVA) Certificate.
11. The steering wheel must be on the offside of the vehicle.
12. Unless approved by the Licensing Authority no fittings outside of the manufacturer's specification may be attached to or be carried upon the inside or outside of the vehicle.
13. Where bench seats are fitted in the vehicle one person will be counted for each complete length of 16" measured in a straight line along the widest part of the seat.

## **BODYWORK**

14. The vehicle must be free from corrosion, damage, or unsatisfactory repairs.
15. Paintwork must be of a high standard and the colour and finish of all panels must match exactly.

## **WHEELS AND TYRES**

16. Where a vehicle is supplied with alloy wheels, all four road wheels must be of the same type and pattern.
17. Where a vehicle is supplied with wheels intended to be fitted with wheel trims, all four road wheels must be fitted with wheel trims of the same pattern.
18. Alloy wheels, wheel rims, and fitted wheel trims must be free from damage and defects which affect the safety, appearance, or integrity of the wheel.
19. Part-worn and remould tyres must comply with the Motor Vehicle Tyres (Safety) Regulations 1994.
20. Vehicles must not be fitted with tyres that are more than ten years old.
21. All tyres, including the spare where applicable, must be the correct size, speed, and load rating for the vehicle as per the manufacturer's specification.
22. All tyres, including the spare where applicable, must be properly inflated in accordance with both the vehicle and tyre manufacturer's specification.
23. All tyres, including the spare where applicable, must have a continuous tread depth of at least 1.6mm across the central three quarters of the breadth of the tyre, and visible tread across the remaining breadth of the tyre.
24. All tyres, including the spare where applicable, must be free from cuts and other defects.
25. The vehicle must carry a method for dealing with a tyre should it become defective. This method must be in accordance with the manufacturer's specification which may be one of the following:

- a. full size spare wheel - which must be the same size and type as the four road wheels and be fitted with a tyre of the same size, speed, and load rating as the four road wheels. Proper tools and equipment for changing the wheel must also be carried.
- b. space saver spare wheel - which must be the correct size and type for the vehicle and be fitted with a tyre of the correct size, speed, and load rating. The tyre must be correctly inflated in accordance with the manufacturer's specifications. Proper tools and equipment for changing the wheel must also be carried.
- c. run-flat tyres - which must be fitted to all four road wheels. Run-flat tyres may only be used if the vehicle is fitted with an appropriate and serviceable tyre pressure monitoring system (TPMS).
- d. emergency tyre sealant and compressor/inflator pack – which must be permanently marked with the vehicle registration number.

#### **INTERIOR LIGHTING**

26. Interior lighting must be provided in accordance with the manufacturer's specification. No additional lighting may be fitted.

#### **SEATS**

27. Seats must be secure and covered with an appropriate material which must be properly upholstered and in good and clean condition, free from rips, tears and holes.

28. If seat covers are used they must be correctly fitted, in a good and clean condition and free from rips, tears and holes.

#### **SEAT BELTS**

29. Vehicles must be fitted with lap and diagonal seatbelts on all seats, including rear facing seats, as per the manufacturer's specification.

30. Seatbelts and seatbelt mechanisms must be in good working order and free from frays, cuts, and other damage, and show no evidence of repair.

31. For the avoidance of doubt any cut, frayed or damaged seatbelt must have been replaced and not repaired.

## **WINDOWS**

32. Windows must be provided at the sides and at the rear of the vehicle.
33. Passenger door windows must be capable of being easily opened by passengers when seated.
34. The front windscreen must allow at least 75% of light through, the front side windows must allow at least 70% of light through and the windows rear of the B-pillar must allow a minimum light transmission of 30%.
35. No windows or glass fitted to the vehicle may have been subject to an enhanced film / after-market tinting post manufacture.

## **HEATING AND VENTILATION**

36. A heating and ventilation system must be provided and must be in good working order.

## **DOORS**

37. All doors must be easily accessible to all passengers and capable of being opened from inside. It must be clear to passengers how to operate the doors of the vehicle.

### **Hinged and sliding doors**

38. When the vehicle is stationary, the passenger doors must be capable of being opened from the inside and outside of the vehicle by one operation of the latch mechanism.
39. Where sliding doors are fitted, an audible or visual warning must be fitted in the driver's compartment indicating when any door is open.
40. Where sliding doors are fitted, there must be a sign within the passenger compartment, clearly visible to all passengers, giving instructions on the correct operation of the passenger door.

### **Electric doors**

41. Where electric doors are fitted:

- a) A sign must be clearly displayed inside the vehicle providing instructions on the correct operation of the door opening and closing mechanism.
- b) The door system design shall incorporate a method to detect an obstruction in the path of a closing door. When an obstruction is detected, the door system shall react in a manner that will allow the obstruction to be released
- c) A method for detecting an obstruction and preventing the closure of a powered door shall be included as part of the design of the door controls.

### **FLOOR COVERING**

- 42. The floor of the vehicle must be covered in an appropriate non-slip material which must be free from rips, tears, and holes.
- 43. All floor covering fitted must be of uniform colour and material.

### **LUGGAGE**

- 44. There must be provision for the safe carrying of luggage commensurate with the number of passengers being carried in the vehicle.
- 45. Provision must be made for luggage to be kept separate and secured from the passenger seating area.

### 8.4 Vehicle age limits

The frequency of testing required (see [frequency of vehicle tests](#)) to ensure the ongoing safety of vehicles is a separate issue to the setting of maximum age limits at first licensing, or maximum age limits beyond which an authority will not licence a vehicle.

The setting of an arbitrary age limit may be inappropriate, counterproductive and result in higher costs to the trade and ultimately passengers. For example, a maximum age for first licensing may have adverse unintended consequences. A 5-year-old used electric vehicle will produce less emissions than a new Euro 6 diesel or petrol car – enabling the trade to make use of previously owned vehicles will assist it to transition more rapidly to zero emission vehicles and improve air quality.

Licensing authorities should not impose age limits for the licensing of vehicles instead they should consider more targeted requirements to meet their policy objectives on emissions, safety rating and increasing wheelchair accessible provision where this is low.

## APPENDIX C

### Consultation – policy and conditions

	Should card readers be a condition on the licence for Hackney and Private Hire	Colour of purpose-built vehicles	Should the condition for spare saver/spare wheel be removed	Should the condition for fire extinguishers be removed	Age limit on electric vehicles	Age of vehicles	Additional comments
1	Everyone should have a card reader						No other changes as far as I'm concerned.
2	Card readers should be optional as it is with shops	All purpose built vehicles should be black so where is a distinct difference	Spare wheels should be removed as most new vehicles don't have capacities to carry them	There is no reasonable reason to have them	All vehicles should have the same age restrictions regardless of fuel type	All vehicles should have the same age restrictions regardless of fuel type	It may be a good idea to be able to bring a vehicle on to trade up to 7 years old and removed at 12 years old
3							No further comment
4	Yes for both vehicles	Yes any colour	Yes remove it, new cars don't always come with one, and its just more expense	Yes	Yes	Yes there should be no age limits anymore, the cost of replacing a vehicle is expensive, and with the job being so quite. Sometimes you wonder why. Also should be kept at 2 tests a year, not 3/4	
5	Also I feel that all drivers hackney or private hire should be made to accept card readers as I get a lot of complaints from customers about having to wait longer if a driver doesn't accept this.			The fire extinguishers rule is also a rule that may need changing, as I would rather stay away from and it passengers with me stay away from my vehicle if it caught fire.		Increase age	I have felt for a while now that vehicle ages needs to be looked at, especially the age of bringing a vehicle on the road, the reason for this is the cross boarder working now, with all Wolverhampton plates, and also Uber now in force from various councils using older cars than Halton.
6	Yes card readers should be a condition on the vehicle licence conditions, for both Hackney and Private Hire Vehicles. There have been instances where drivers are insisting on cash payments and taking the client to a card machine, thus increasing the charge and causing anxiety to the customer	They should remain black to identity a Hackney vehicle, which can pick up without booking. Using any colour can increase the probability of Private Hire Vehicles illegally picking up without booking.	All vehicles should include these.	Providing its not an insurance necessity, then the inclusion of a fire extinguisher should be removed from the vehicle licence conditions. In the case of a vehicle catching fire, the advise is to move as far away from the	Comments have been received from the trade that the age limit on electric vehicles should be changed due to the cost of purchasing an electric vehicle, please provide any comments. N/A at the moment.	Yes the age of vehicles should be changed due to the cost of purchasing a new vehicle. Providing your vehicle is fit for purpose (valid MOT), then continued use should be allowed. Drivers out of HBC licensing do not have to abide by the twice yearly MOT, so do not have to follow these same rules. HBC residence	

				vehicle as possible, not attempt to extinguish the fire		who use UBER, could be at high risk of either of being in an accident, or unsure whether the insurance fully covers them as customers. Quite worrying.	
7	Card machines shouldn't be part of the test, I can take payment on my phone.	Colour should remain black on multiple purpose vehicles, as we need to stand out from all the cross border hiring vehicles in our area.	Yes it should be removed, I'd phone the AA or road side assistance	Yes the fire extinguisher should be removed as we aren't trained to use them,	Yes the age should be older, just to encourage people to use electric vehicles more.	Yes the age should be higher as cars and engines now last longer and they're definitely getting more expensive	
8	All Hackney and PH to have card readers for convenience of customers	Any colour due to scarcity and extra expense of black vehicles	All vehicles to carry spare or space savers, safety of customer	Remove extinguisher, we are not trained and fire most likely in engine. Believe it is very dangerous to open bonnet.	Stay same as before.	Raise age to 12 years with 2 tests. Also consider having milage restrictions on new vehicles instead of age. I can bring a 3 year old vehicle on that has done 100,000 miles but not my wife's 6 year old vehicle that has done 34,000.	
9	These should not be a mandatory condition. Its becoming increasingly more difficult to earn a living and often to meet national minimum wage as a Hackney drivers in Halton, additional fee's for card payments only add to this burden. Therefore this should be down to each drivers personal choice of payment method.	London cabs should remain at being any colour however all other vehicles should stay black	This should remain as its important top carry a spare wheel	Should be removed from licensing conditions. Unsure if one has ever been required. In the event of an emergency appropriate emergency service would be contacted	I agree that electric vehicle time limit should be extended. The cost to purchase are typically more expensive and thus will also create an incentive to switch to electric vehicle	As previously mentioned its becoming more difficult to make money, especially with the cross boarder rules no longer in place. Drivers have all taken a huge hit over the past 5 years and average yearly income has rapidly declined, for this reason age of vehicles should be extended to allow drivers to save for new vehicles and to purchase a vehicle within their budget. This also allows drivers with brand new vehicles to pay off any existing finance agreements over a longer period of time to increase monthly affordability.	
10	If a driver doesn't want to use a card reader then I think its his choice, I don't think this should be mandatory to gain a license	I don't think the colour of a purpose made vehicle matters after all London cabs come in all colours.	Cars supplied new don't have a spare wheel they come with a pump and repair kit however a spare wheel is the best option to keep you on the road	Fire extinguishers are a must they should be kept	No comment	The age of vehicle should be extended not only for the cost of replacing with a new one. But speaking for myself my car is tested twice a year by the council workshop, also I service my car every 6 thousand miles to maintain perfect running order and its clean inside and out. Its in perfect condition so why	

						can't it stay longer, with the cost of living through the roof and the amount of competition now in Halton we are barely making ends meet.	
11	No, I have had one for several years but I think its personal choice it should be personal choice. They're a pain to be honest, you often drop off in areas with a poor signal and it can be difficult to get one, if people want to pay by car it's probably better for them to do it through the prepay facility on the app.	I think that any vehicle should be any colour, there's black private hire in widnes with out of town plates so whats the point in Halton being different, the waters have been muddied as the town is flooded with vehicles from other councils so it makes no sense any longer	New vehicles don't come with a spare wheels anymore so I don't think it should be mandatory. They come with a foam pump to reinflate and temporarily fix the puncture until you get to a garage.	I've never had to use my fire extinguisher in 23 years and never known anyone else to have used one so I'd say they're not needed personally.	See point 6.	Halton is now flooded with drivers plated in authorities that don't have age restrictions on vehicles, we're all working in the same area so to make it fair it should be the same rules for everyone. That's why you never see prestige vehicles in Halton, it wouldn't be worth investing in a Mercedes under the current restrictions, I think if age limits were stopped people would be more inclined to but these types of vehicles. If a car is good enough to pass a mot does it really matter how old it is	
12						The main one that really stands out for myself is the age of vehicle, I have been doing the taxis for nearly 20 yrs & always kept my car in tip top condition, but when you see other vehicles working our borough in no wr're near the condition of my car it really hits home. I alike no doubt other Halton taxis are noticing that taxing does not warrant going into debt on a new car when we're struggling to make a wage with the massive change in the job.	To many taxis without Halton plates are having a big impact on our job, our living & I honestly can't really afford going into debt at this present moment until things change. My car is a very good example & when customers are commenting on how nice it is, why get rid of it when there happy to ride in it & I'm happy to maintain & keep it to a high standard.
13	No, people already use them, if they want to pay cash keep it as it is. If a driver who doesn't have a reader and it's the only way to pay, that's up to them to get paid. Just do it through the office if needs be	Keep with different colours, but see if you can do it with the 7 seaters as then private hire only use cars, as it was years ago.	Leave as is	Leave as is	Yes but don't think may will buy, as they still no good as a taxi	As cars are a lot better than years ago, they should be aloud to bring on under 7 years with a maximum mileage of 80,000. And keep the vehicle up to 14 years old, but as long as they don't exceed 300,000 miles at 12 years old, plus get rid of the 3 tests as long as they don't have loads of advise on test.	

14	No	Should remain black	Yes	No	No purchasers choice to buy electric vehicles	Yes	
15	No	Purpose built any colour. Would give drivers more opportunity to find a cheaper vehicle.	Yes	No	Yes	Yes vehicles coming on should have the age limit increased to 7 years. Coming off should be 12 years. Allowed drivers to find a more affordable car. Purpose built cabs should have no limit of expiry	
16	Yes	Yes they should be allowed as its so expensive to have them sprayed	No it should not be removed, due to safety issues	Yes it should be removed, luckily never needed to use one and probably never would.	Yes electric vehicles should be allowed on longer years due to the cost of running and purchasing them	Yes if it passes the taxi tests then they should be allowed to stay on a lot more years, due to the cost of purchasing, the upkeep and standard of the vehicle, far to costly to replace.	
17	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
18	Yes	Yes they should be any colour as far to expensive to get them resprayed if purpose built	No spare tyres space savers should not be removed due to safety issues	Yes fire extinguishers should be removed, never used one in over 40 years.	Electric vehicles should have a longer age restrictions due to cost of purchasing, and battery costs.	Yes vehicles should not have an age restriction and should be allowed to be kept on a lot longer as long as they pass the councils taxi test each year without to many faults due to age.	Vehicles are to costly to replace especially if there's plenty of use left in them, not everyone puts hundreds of miles on their vehicle every year. Plus when your older you can't get finance to replace a car.
19	I do have a card reader & find it useful. However, I don't think it should be mandatory as some drivers may struggle with technology & if you don't have an iphone to connect it too, you will struggle.	No view either way	I think this should be removed, we have some great contacts in Halton that we can ring when needing to replace a tyre.	Definitely support this being removed. If the taxi is on fire, from a Health & Safety point of view, you would put distance between yourself and the car, so unlikely to utilize the fire extinguisher anyway.	I would support the age limit for all cars to be increased due to cost of buying a new vehicle. This will be in line with other councils and taxi providers such as Uber, who are operating with much older vehicles	I would support the age limit for all cars to be increased due to cost of buying a new vehicle. This will be in line with other councils and taxi providers such as Uber, who are operating with much older vehicles	
20	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further	

			without spare wheels on the grounds of efficiency, therefor it should be removed			increase diminishes the quality of PHV fleet	
21	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed			No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
22	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
23	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
24	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
25	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
26	No	Any colour doesn't matter	Remove as new vehicles aren't fiited with them anymore	From a safety point of view I'd keep them	No preference	Absolutely not, otherwise standards and safety would be severely impacted	

27	Yes	Yes I think hackneys should be allowed to by any colour, they have the taxi light and some even have the words Taxi and back and sides	Yes it should be removed. A lot of cars now have no space to store a spare wheely and its has to be fastened inside the boot, taking up valuable space. How about as part of the vehicle check if no spare wheel in the vehicle ten there must be an emergency repair kit. Like what most new cars come with.	I don't think fire extinguishers should be removed	This would be great, maybe make it the same length as wheelchair accessible vehicles. Would encourage drivers to but electric which can only ne a good thing	Don't see why not, they are checked every 6 months anyway after 3 years.	
28	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
29	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
30	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
31	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	

32	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
33	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
34	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
35	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
36	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
37	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	

38	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
39	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
40	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
41	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
42	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
43	No should be personal choice	No comment	No comment	Yes remove in 21 years never heard of anyone using one	Yes extend the cost of vehicles have rocketed	Yes extend the cost of vehicles have rocketed	
44	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further	

			the grounds of efficiency, therefor it should be removed			increase diminishes the quality of PHV fleet	
45	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
46	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
47	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
48	No should be your own choice, but should have stickers on vehicle saying "No card reader" so the customer understands, I use one myself with no problems	As there is now vehicles from other areas working in Halton with different colour vehicles, I don't see a problem with Halton vehicles being any or a few selected colours	This condition should be removed, if there is no room for a spare in the vehicle, providing they use run flats, personally I'd rather always try and buy a vehicle with a spare.	I like having a fire extinguisher available, I'd have one regardless	No electric vehicles is nothing to do with an age limit. The Dacia Sandero has a new RRP range of £13,795 to £17,295, the Audi A6 has a new RRP range of £44,590 to £69,875 should the Audi get a longer age limit because of no price No the price you pay and the Vehicle type is your choice	New and used vehicles are both expensive at the moment. So rather than extending the vehicles final age limit think about extending the age at which the vehicle can be first tested as a PHV or Hackney, as of now its under 5 years old, if it was say under 7 years old, the price range would be cheaper to buy, a car under 7 years old would have lower mileage and be in better condition than a 10 year old PHV or Hackney Vehicle its age limit extended.	
49	No	No material differences	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency,	No material differences	No material differences	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	

			therefor it should be removed				
50	No this would be very costly problem for me I would have to buy a new phone and card reader a very expensive and unrealistic idea to cater for the few people who want to pay by card	This should remain unchanged to keep the distinction between hackney and private hire	No idea	I have never used one	They wear out just like all others	No change should be made	
51	No	Vehicles should be any colour	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed			No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
52	Yes in all	Yes any colour	Yes removed as most vehicles have no room in boot or run flats fitted	No need for them should be optional	Yes longer due to cost of vehicle	All vehicles should have a longer life span than 10 years not only are newer vehicles more expensive but most if not all that are taken off are in perfect condition and with other private hire vehicles (Uber) are driving around in cars lot older making it easier for them to compete with us and making it a lot harder for us, its crazy to change a perfectly good vehicle for no good reason	
53	Should be made mandatory	Purpose built should be black if Hackney except the London Hackney Cab	Modern cars don't come with spare wheels so condition should be removed	Should remain as a condition	Should be increased	Should be increased	
54	No I can only speak for myself I really have problems with technology. I purchased a card reader and I have to admit I couldn't use it properly. In turn cost me quite a considerable amount of money. In 4 weeks I lost £160.00 because of my inability to use the machine	I feel that the system that is in use is more than adequate. The people of Halton are aware and used to knowing a black vehicle is hackney. So I don't see a need to change the requirements as it could cause confusion for the public.	I feel the public should at least be aware that if a situation arises such as a puncture that the journey can be completed by a wheel change	I cant think of an excuse for not having a fire extinguisher in a vehicle. For the safety of the vehicle the customer and the driver.	Drivers have to look at their own finances to see what is in their budget. I personally would like to see more and more EV's on the road as taxis. But raising the age limit also leaves the door open for other people who may take advantage of it	I feel much the same as point 5 (previous question) the vehicles and standard of vehicle in our borough is excellent and anything that affects that is in my opinion is a risk to the quality of our service to the people of Halton	

55	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material difference	No material difference	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
56	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material difference	No material difference	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
57	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material difference	No material difference	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
58	Yes		Yes	Yes		Yes	
59	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material difference	No material difference	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
60	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material difference	No material difference	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
61	No	Does not matter	No longer a fitted item	As a safety issue I think they should be fitted	Makes no difference	As long as a vehicle is well maintained it should be reliable vehicle for the companys fleets. In the long term the age should not be changed as mileage could be the issue and not the age of it.	

62	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material difference	No material difference	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
63	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material difference	No material difference	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
64	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material difference	No material difference	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
65	Yes for both PHV & HCV its more convenient for the customer	No residents of Halton recognize HCV as black only. By introducing any colour to purpose built vehicles, I feel it would be confusing and may lead to PHV drivers chancing their arm on a rank or accepting a hailed fare	Yes if I had a blow out whilst carrying passengers, I'd organize a replacement taxi to take my passengers and phone a mobile tyre specialist	No they are a vital part of H&S and could be lifesaving on that one occasion its needed. Plus, I would suggest all electric cars have an extra appropriate extinguisher in the event of battery or electrical fire	Yes for obvious reasons	Yes for obvious reasons	
66	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material difference	No material difference	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
67	I have a card reader in my taxi away it can be a good thing and in others not, Some people want to go out of town and say to the driver do you take card we say yes when you get to the	Colour of the hackney taxis should stay black as it will confuse the customer in widnes and runcorn as we	Fire extinguishers, I know there will be mixed opinions about this question I have mine in and happy to have it.	Electric cars I do know they are expensive to buy like any vehicle it's a big outlay of money and I think if you keep up with	Age of vehicles yes I think they should be removed we have cars coming in to halton now of all ages and they still		Halton borough exercise strict rules with our taxis that we keep them up to a standard the best we can which is welcomed by the

	<p>destination they put it in knowing it's declining. Then its it must be the card I'll get the cash from a cash point you let them out an they run off. So I think it should be left to the driver if he wants one or not but I do have one.</p>	<p>have far to many out of town driver sitting on ranks ect. At least if we leave it as it is people will know it's black it's a hackney.</p>	<p>I don't have an opinion on it I know the fire service do advise to move away leave it to them but if its small or some one is trapped in a accident at least you can fight it until help gets there i suppose.</p>	<p>the maintenance and they are in good order I think age should be looked at to get the revenue back what you paid out.</p>	<p>pass the test from other councils.</p>		<p>way and the testing structure of every 6 months I don't know why we don't change or remove the age. What me and other drivers I've spoke to have mentioned that wheel chair taxis today are so expensive and it's alot more now to buy a wheel chair cab now than what it was years ago. Vehicle manufacturers have come on since back in the 80s 90s where a car would last for maybe 8 years then have more holes than a sieve. When I've looked at knew wheel chair cabs now they are silly expensive and we don't live in a city like Manchester London ect we live in a town so it would be crazy to spend that much money on a wheel chair cab for a small town like widnes or runcorn we don't have the revenue coming in to pay for them. More to the point in my mind if the age of the wheelchair cabs are not removed or altered how are disabled people going to get about of a night time or any time it's restricting them which in my eyes is not fair on wheelchair users they find it hard enough to get out and about by putting age limits on these vehicles would make it even harder</p>
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							<p>as when mine gets to the age I don't think I will be getting another wheelchair vehicle due to the price of them. Its like taking out another mortgage on cabs direct website it's £59,995 Over 6 years that would be about 10k a year about £833 amonth that is cash price if you got a bank loan or finance it would be more plus test fee license fee fuel, service ect.</p> <p>It would be easier and cheaper to get a car due to the cost of living ect.</p> <p>Sorry if I go on I'm just trying to stress how the age rules affect us or could affect us in the future.</p>
68	No	Any colour	Yes remove or make it discretionary	Yes remove as not needed really but again discretionary an option	All vehicles are expensive now, so shouldn't be so age restricted	All vehicles are expensive now, so shouldn't be so age restricted	
69	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material difference	No material difference	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
70	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material difference	No material difference	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
71	This would be an additional expense to have these in our vehicles.					This is an issue for us. As a small business our vehicles accumulate	

	<p>Our margins are tight now and to impose extra costs would require another increase in our cost to customers.</p> <p>As we own the vehicles, we would also have further administrative costs and we cannot see any value from this both to the business and the customers.</p> <p>Currently we take card payments over the telephone if a customer does not want to pay cash on the day. For business customers we invoice at month end.</p> <p>A separate issue could potentially cause us further problems when dropping at the airport. All airports now charge to drop off and if we are delayed in this by taking card payments drop off charges could considerably ramp up.</p>					<p>high mileage. To purchase a new vehicle is very costly requiring us to take out finance/loan agreements. The depreciation is also considerable on a new vehicle due to the high mileage.</p> <p>We have viewed several 2<sup>nd</sup> hand low mileage vehicles that are in excellent condition, costs are lower, and we would be able to purchase without expensive finance.</p> <p>As a small business this would be better VFM. However, to only allow them to be licenced for a shorter time is costly to us. Our vehicles are regularly serviced and checked by the council we also carry out our own checks' cleanliness etc so we feel they could continue to provide a good reliable service beyond the restricted years.</p>	
72	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material difference	No material difference	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
73	No it should be the drivers choice, as no other outlets are forced to accept cards.	They should remain black for easy identification by the public for their own safety, so they do not hire an uninsured private hire by mistake. I believe this to be very important safety issue	Yes it should be removed	No it should not be removed	I agree with extra years as they are as they are an expensive item	Yes I agree with age extensions as soon as possible as both new and second hand vehicles are expensive. The extension needs to apply particularly to hackney wheel chair vehicles as they will become extinct in the borough because of their cost compared to cars.	Earnings are still low after covid. We must also take into account our private hire competitors who are being encouraged to plate vehicle outside the borough (Wolverhampton) with no age limit at all.
74	Drivers discretion	Any colour as Alpha have black private hire working in the area.	Not needed as most new cars don't come with them, car either come with	Not needed as more drivers are not trained to use them	Electric vehicles are expensive so maybe 8 year old	Needs to come down as other boroughs have longer age limit need to come inline with them maybe 7	

			run flat tyres or puncture repair glue			years to continue to come on and max 12 years	
75	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefore it should be removed	No material difference	No material difference	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
76	Yes to both	No hackney should be black and no other colour	Most modern car don't carry a spare wheel anyone so why should it be part of the MOT procedure unless they are supposed to be fitted with a spare wheel	Should still be part of the MOT	Price doesn't come in to it it's up to the individual	Same as previous question	
77	Yes I think with the way of the world today that a card reader is an important tool for a taxi driver to have in their vehicle at all times Hackney or Private hire and should be made a condition of your licence	The colour of purpose built vehicle should be allowed to be any colour as they are easily identified as a taxi whatever colour they may be plus it might make the purchase of such vehicles a little easier as there will be more to pick from and with cross border rules there is already different colour Hackney vehicles working in the borough	Should just remove this condition most new cars don't come with a spare wheel and with the new electric cars there is no space for a spare wheel so all we are doing is taking up luggage space	Fire extinguisher you know my feelings in this one it's actually dangerous to try and put out a fire we are not trained fire fighters We need to get out get any passengers out and stay out and call the fire brigade	Electric cars are double the price of a similar fuel type vehicle so if the council wants to encourage people to purchase electric cars then the licence conditions need to be more favourable so yes extending the life expectancy is a must.	Age of vehicles in general we have a fantastic fleet of taxis in the Borough but the job is very hard at present and we can't see it getting any better any time soon so we the trade need some help and by allowing people to purchase slightly older cars or keeping their current vehicles for longer would be a little help that the council could do quite easily	
78	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefore it should be removed	No material difference	No material difference	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	
79	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency,	No material difference	No material difference	No the age of vehicle should not be changed on the grounds of providing quality reliable vehicles. Any further increase diminishes the quality of PHV fleet	

			therefor it should be removed				
80	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material difference	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	
81	No	Colour black is old and other taxi Council's let you have any colour lets be the same as other Councils or have 3 choices black white or silver	Have a wheel if you don't have a wheel and your in a area with no mobile signal you car sort this out yourself and feel safe we're if you have never has one you could be there for a while	No as the fire department says if your car is on fire get to a safe place call 999	No they are bad for the environment you brake down there not enough charge	Big yes	
82	No	Define purpose built	No it shouldn't be removed I think common sense dictates that you should have a replacement of some sort	We've had fire extinguishers for the past 20 odd years or so now so why get rid of them	N/A	My car must go by January next year. Since I have had it, it has been services twice a year by either yourselves or Booths, in 2022 it had a fully reconditioned engine fitted by Booths & Dieselcraft, both reputable businesses, as of today it has only done approximatley 90,000 miles.	Because it has been services by yourselves at the testing station, any faults have been rectified and/or replacement parts fitted on the day so it hasn't been off the road for any kind of failure. I think the vehicle should be licensed with regards to its past test history.
83	Firstly the council will have to change the conditions so that all drivers will have to a smartphone. How will the council work round that, some drivers may still have Brick type phones or might not be tech savvy to know how to work the apps and card reader. Also it means passengers get a free pass if they can't get a signal, or not have any money to pay the fare in the first place how would we know, and what would the council do to protect the driver in this situation. Insist on taking payment up front ?	There is no need to change the council policy on this it will lead to out of Borough private hire ranking up on taxi ranks even more than they do now eg. Wolverhampton Liverpool Knowsley and Sefton private hire.	This needs to be removed at the earliest opportunity for cars that have no designated place to store a spare wheel 95% of other boroughs allow tyre inflation kits so why can't we it doesn't solve every problem but it beats having a spare wheel in the luggage compartment meaning large items like wheelchairs wouldn't fit in. The councils solution at the moment is run flat	taxi drivers are not trained to a fireman's job attending to a car fire were flammable liquids and fabrics are ablaze so why would you expect them to tackle them with a small fire extinguisher. If drivers wish to have a fire extinguisher let them but don't make it compulsory.	I proposed this idea for the forum to ponder and with financial and environmental concerns I think it's justified on its own merits I accept that 4 monthly tests would probably be required and that would be acceptable to drivers as long as they weren't burdened with excessive test fees for this.	Because the Borough is overrun with out of town taxi firms that don't adhere to our stringent regulations concerning licensed vehicles (which drivers don't have a problem with by the way) by letting them use them for longer gives us a more level playing field and 4 month test wouldn't be a problem. Licensed vehicles in this borough are far better than surrounding areas so I think this is a viable proposal.	

			tyres which would mean taking 4 road legal tyres of the car and replacing them with run flats at a cost of nearly £1000 also not all car tyre sizes are available in run flats so maybe invalidating insurance and the cars warranty if the incorrect size tyre is on the vehicle.				
84	No	Should be black	There should always be a spare wheel/space saver	Should be removed from vehicle licence conditions	Electric vehicles could be seriously dangerous after 10 years so no change	The vehicle age should be 12 yrs for cars and 16 yrs for cabs	
85	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material difference	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	
86	All vehicles should have card readers, it makes it easier for customers		All vehicles should have a spare wheel, it takes 10 minutes to change a tyre & if you have customers in, its quicker for them.	Basically a waste of money now, they wouldn't put a camp fire out let alone a car fire		Yes	The biggest thing that needs addressing is the age of All vehicles. Since covid, they have gone up exponentially. What cost £10,000 pre covid, is now costing upwards of £17,000. The cost of living crisis is crippling the taxi industry at the moment. Taxis are a luxury nowadays. & drivers are roughly about £200 A WEEK down on earnings now. Making us work longer hours, more days. Putting more wear on vehicles in doing so. So it should be brought in line with Wolverhampton criteria. An older vehicle

							doesn't mean a substandard vehicle.
87	Yes	7 seater wheelchair cabs are difficult to obtain in black and should be any colour provided the vehicle is clearly marked as a taxi	All vehicles should have a spare wheel	All cabs should carry a fire extinguisher	Status quo should remain	Registration age should be changed to 6 years 11 months	
88	Yes	Yes	Yes	Should be removed on the grounds of cost and also for being rarely used in real life situations	Yes	Yes	
89	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material difference	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	
90	No not to be a condition on licence	Should remain black only	There should always be a spare wheel or space saver	Should stay a condition of vehicle licence	Age limit should remain the same as the battery's degrade after 10 years	The age of vehicles should be 12 years and no age limit for wheelchair accessible vehicles	
91	No card readers should not be a condition	Colours options SHOULD stay the same so as to avoid confusion for current drivers when reapplying. Avoids confusion for customers who are aware and use to the current system. Keeps it fair to Drivers who have had to stick to the current system already in place.	Spare wheel/Space saver should be part of conditions as this is a safety feature	Fire extinguisher should be part of conditions as this is a safety feature	No comment	Due to extra rises in cost I believe the age condition should be increased by an extra 5 years on both standard and wheelchair access. This should be accompanied by an extra MOT each year after the normal age limit has expired so 3 MOT a year. 1 every 4 months	
92	No	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	No material difference	No material difference	Vehicle manufacturing industry has seen fit to provide new vehicles without spare wheels on the grounds of efficiency, therefor it should be removed	

93	<p>I personally these should now be made compulsory and be brought into the licensing conditions.we are now after all in the 21st century and a large percentage of our customers carry cards/phones etc for contactless payment, along with the fact again most customers now have salaries paid directly into the bank. Also it can speed up the time taking a booking and the time taken by a fleet searching for a contactless vehicle.</p>	<p>I think the vehicle colours are fine as they are, my personal opinion is all purpose built vehicles i.e.wheelchair accessible should be issued with a hackney plate and coloured Black the plate retained with the owner until the vehicle has served its life whence the plate is returned to the council. The owner then should he decide not to renew a purpose built vehicle should seek a plate elsewhere. My reason for this is the education of the public, after all these years they are still confused as to whether the vehicle is a "taxi" or private hire? To them all vehicles with a licence are "taxis" a word now being replaced by the youth with the word "UBER"</p>	<p>Pretty much all cars today are supplied without a full spare wheel, especially Electric vehicles, as not only is there no space beneath said vehicle the recommendation to not even jack the vehicle up is suggested as it can be dangerous and short out batteries. If the council wish to see an increase in E.V'S in the fleet this necessity would need to be removed, also noting run flat tyres are not a financially viable option either as are way to expensive even to consider on an E.V. as weight restrictions on said tyres makes them extortionately overpriced.</p>	<p>I think fire extinguishers are no longer needed as yet I haven't seen one used, plus so many different vehicles now in production could actually be dangerous as different fires require different extinguishers i.e. electrical fire, petrol fire, diesel etc</p>			
94	<p>I personally these should now be made compulsory and be brought into the licensing conditions.we are now after all in the 21st century and a large percentage of our customers carry cards/phones etc for contactless payment, along with the fact again most customers now have salaries paid directly into the bank. Also it can speed up the time taking a booking and the time taken by a fleet searching for a contactless vehicle.</p>	<p>I think the vehicle colours are fine as they are, my personal opinion is all purpose built vehicles i.e.wheelchair accessible should be issued with a hackney plate and coloured Black the plate retained with the owner until the vehicle has served its life whence the plate is returned to the council. The owner then should he decide not to renew a purpose built vehicle should seek a plate elsewhere. My reason for this is the education of the</p>	<p>Pretty much all cars today are supplied without a full spare wheel, especially Electric vehicles, as not only is there no space beneath said vehicle the recommendation to not even jack the vehicle up is suggested as it can be dangerous and short out batteries. If the council wish to see an increase in E.V'S in the fleet this necessity would need to be removed, also noting run flat tyres are not a financially viable option</p>	<p>I think fire extinguishers are no longer needed as yet I haven't seen one used, plus so many different vehicles now in production could actually be dangerous as different fires require different extinguishers i.e. electrical fire, petrol fire, diesel etc</p>			

		public, after all these years they are still confused as to whether the vehicle is a "taxi" or private hire? To them all vehicles with a licence are "taxis" a word now being replaced by the youth with the word "UBER"	either as are way to expensive even to consider on an E.V. as weight restrictions on said tyres makes them extortionately overpriced.				
95		I believe they should stay black	I think we should be stop with a spare wheel especially in electric vehicles				
96	I believe this should be a part of the conditions given the drivers are able to choose which card machine they want. CWaC Council and LC Council only enforce this on Hackney Drivers whereas I believe Sefton Council enforce this on all vehicles. The choice of terminal should be left to the driver as different companies charge different rate for different level of service, i.e. next day payouts vs weekly payouts	– A vehicle that is black is the second most common colour of car. I believe dictating the colour of vehicles to distinguish between a Hackney and PH is not an effective way to do so. A more effective way is with purpose-built vehicles WAV, LTI/ E7 etc are more what the public would expect a hackney to be. I think a 10–12-year age limit is good practice and keeps the car at a good age, however the maximum of 5 years should be brought down to 7-8 years as the costs for the car are a lot cheaper.	Most newer cars don't have them; I'd say money better to have 24-hour breakdown cover than a spare wheel	No opinion on this, most drivers wouldn't be able to put an engine fire out with what is in the boot			
97	No	No	Yes	No	Yes	Yes	
98	No	Purpose built vehicles should stay black	Should remain	Should remain	Should be changed	Should be changed	
99	No drivers should be able to choose if they have a card reader or not	Vehicles should be any colour due to costs associated with respray/purchasing specific colour vehicles	Should be removed as most new cars no longer have a spare wheel included. This also takes up additional space	Yes this should be removed – never used in 20- years	Agree due to costs associated with electric vehicles	Agree due to costs associated with replacing vehicles especially in current economic climate and cost of living crisis	

100	Yes	Black	Definitely yes	Yes	Raise age limit	Raise age limit by five years at least	
101	Yes everyone should have a card reader in my opinion	Yes I would like any colour for purpose built vehicles but I would also like it for any Hackney vehicle due to the price of black cars. It also limits us to finding black cars to meet the criteria	Yes I feel the need to carry a spare wheel realistically don't feel the need to carry a spare wheel	I feel fire extinguisher is not required these days	I would like to see electric vehicle to get a life of 15 years due to the price	Same as electric vehicles	
102	<p>These should not form a condition for carrying in HCV or PHVs. Taxis are independent / itinerant businesses / traders. It must be for the driver to decide taking into account his/her own business needs and running costs because these readers have a cost to provide and to run.</p> <p>I paid £140 for a stand alone sim based reader and a deduction from sales of 2.7%. Additionally, from experience there are no tips from card users which in effect is a further deduction for the business. There are also signal problems; for example Daresbury Business Park, Windmill Hill and various spots around the borough.</p> <p>A current tactic being deployed against drivers is insufficient funds on cards and on ApplePay the device needs a certain level of charge for a transaction to complete. These users knowingly get into a taxi with insufficient charge. There is nothing in the legislation which covers the device charge and it is a total loss to the driver whom cannot at the best of times get help from the police.</p>	<p>This is no longer necessary given the sheer number of vehicles from neighbouring and further afield boroughs freely operating in Halton. A purpose built vehicle now costs upwards of £65,000. I recently had to pay £2500 for my next vehicle over the costs of the same vehicle in a different colour. The roof sign is sufficient. It is sufficiently covered in law that only a hackney carriage can have a taxi sign and thus they are readily depicted in any colour.</p>	<p>This should be removed. Breakdown cover is used on the road mainly for safety and taxi companies can and do send relief vehicles to those unable to continue the journey.</p>	<p>This condition should be removed. Fire Service advice is to safely evacuate the vehicle and call them.</p> <p>Today's motor vehicles no longer just use fossil fuels but use hybrid and full electric power. Other fuels include LPG. The same standard extinguisher is not suitable nor safe to use on all vehicles. Drivers also do not have any training in fighting fires.</p> <p>Even touching some extinguishers without the correct protection can result in serious injuries.</p> <p>In my previous employment full training on each type of extinguisher was given over two full days with periodic refresher training.</p>	<p>Agree that the age limit should be removed but it should be removed from all types of vehicle because they are now massively more expensive and additionally Halton is a relatively small town and from an earnings perspective doesn't generate the incomes typical of the larger authorities/cities.</p> <p>Historically the age limit was brought in to protect the trade from nearby areas but now with cross border hiring and the proliferation of Wolverhampton licensed vehicles the Halton trade is hampered by this policy.</p> <p>Standards across the Halton fleet are very substantially better than they ever were during the seventies and eighties. This was expressed by the garage</p>	Same as Electric Vehicle comment	

	If this condition goes through it should carry an amendment to cover the device payment method and there must be a minimum fare amount. I'm not advocating higher prices than tariffs; just that the journey should 'clock' more than say £5 for digital payment to be accepted.				lead Mr Cullen. Standards are now very high.		
103	Personally think its time all drivers had card readers. Although its not just making the drivers get a card reader it's the attitude towards using it when customers get in the vehicle	Happy have a purpose built vehicle in other colours as when buying these vehicles there is already such a some range of options a single colour choice can be the different between buying one or not. Maybe changing this would encourage more drivers into having them,	I feel like all vehicles should carry a spare wheel either full size spare or a space saver	Having never used my fire extinguisher and probably never will I would be happy for this to be dropped.	The electric saving when charged at home is huge compared to the cost of petrol or diesel. Any electric taxi that in on for the duration of its life would more than recover its price difference. The extension of age is not necessarily in my opinion as the financial incentive is already to buy one.	The vehicle age is a bit of open one here as I would like to see it that an older vehicle could ne brought on as long as it is under the maximum age. Making staying with halton council more financially viable instead of license shopping to save some money. I'm happy with the maximum age of vehicle and don't think this needs to change	
104	No	No material difference	The vehicle industry has provided new vehicles without spare wheels, for efficiency, so should be removed.	No material difference	No material difference	No. If the age of the vehicles is changed, this could mean the vehicles would be less reliable.	
105						The age of cars should be extended to 15 years.	
106	Yes	Colour of vehicles should be kept black				Age of vehicles should be extended as long as they pass there 2 yearly tests.	
107	Card readers should be available in all taxis "hackney/PH" the high percentage of customers now use card.	Purpose built hackney vehicles should be available in any colour easily recognised	All taxis should have either a full size spare wheel or space saver its avoids getting stranded	No I do not think a fire extinguisher should be part of the compliance test. I have never had the need to use one in the 35 plus years also would all drivers know what to do if required to use it	Most definitely electric vehicles should have a longer age limit due to the cost of purchase and batteries have a much longer life than conventional engines	Yes definitely vehicles should have a longer age limit due to the high cost of replacing and overheads increasing plus the decline in the trade which in turn means less annual mileage . Taking these factors into account drivers will leave rather than get into debt replacing their vehicles which	

					also encourages a cleaner environment	means eventually the trade will suffer..	
108	No not reliable enough	Any colour	Should have a spare wheel	Keep	Same age as petrol and diesel vehicles	Increase the age of vehicles, because of decline in business and cost of living, overrun with cross border taxis and illegally parked card on Hackney ranks	
109	No	Any colour they are purpose built	No new cars don't come with a spare wheel	No	All vehicles are expensive	If they pass the MOT test its shouldn't matter	
110	I have one and have no issue taking card payments at all but don't think it should be made mandatory. We do incur charges for using the card machine and I think it would be hard to police as you'd still get drivers who don't want to use one telling customers that there reader isn't working and stuff like that.	I think this should be changed, I am private hire at the minute but would like to go Hackney in the future and been only able to pick a black car severely limits your choice and therefore might not get the best deal for a car. Also with the amount of out of town drivers in the town now who can use black cars I don't think there's any need for this anymore.	Also think this should be changed most cars now a days don't come with any kind of spare wheel  my car didn't and I have to keep it in my boot which takes up a lot of room and can make it difficult fitting things like fold down wheelchairs in.	Don't see the need for these anymore never had to use mine in 8 years and don't know a driver who ever has, I've had to replace mine twice even tho I've never used it as they lose pressure over time.	If your wanting to encourage people to buy thses them the more flexibility the better as they are expensive	I strongly think this one needs changing when I bought my last car there where many better options but I couldn't take advantage as they where older than 5 years old. These cars get MOT'd every 6 months as long as the car passes and in good condition I don't think it should matter how old it is	
111	Yes I think card readers are a must	Any colour	Spare wheels are a must have	Fire extinguishers are not needed		Yes extend to 12 years and 7 years when first put on the taxis would help drivers a lot with the price of vehicles	