

TLTA Consultation Response September 2021

The Torbay Licensed Taxi Association has compiled this document in response to the H C & P H Licensing policy consultation

2.6 (p.12) Encourage Environmental Sustainability

The statement “Investigate conversion systems” has been removed.

Many drivers have voluntarily already upgraded their vehicles to Euro 6 engines as this standard was introduced in September 2015 to reduce harmful exhaust emissions in petrol and diesel vehicles. There is a willingness within the trade to move to greener option and some drivers are exploring hybrid or electric options especially in light of Licensing’s initiatives to encourage this move. While we fully appreciate the Governments need to reduce societies carbon footprint there are several emerging ways in which we can look to improve this locally as well as nationally. It seems a little excessive and unfair to remove the investigation of **conversion systems as this may in the near future be an economical alternative for the trade as technology advances**. It may also help reduce the amount of petrol or diesel vehicles scrapped as their value on the second- hand market would depreciate under the pressure of market forces as they would appeal to a more limited resale market.

Proposed Changes within the Policy

5.22 (p. 16) MEDICALS

Due to pressures on the NHS. it can be difficult to get driver medicals done in a timely fashion by the drivers own GP. While it is useful to have a list of providers willing to provide this service it seems a little harsh to only use your own GP and this group. Any Doctor should be able to use the national data base that has been created and is being developed to share a summary of a patient’s medical record including past and current prescriptions etc. This development makes it safe easy and quick for a doctor to look at a summary of your medical record which includes diagnosis and conditions past and present. To make this process quick and simple they can even be accessed by the patient via the *NHS App* or *Patients Know Best* App on mobile devices however the patient cannot delete or amend entries or in any way alter the information stored.

This should allow any qualified Doctor to ensure the driver satisfies all the requirements for the DVLA Group 11 Medical standards of fitness to drive. The medical form issued by Torbay has very specific questions to this end on the form that the Doctor must sign.

There is some concern over a lack of choice and the potential impact on fees charged as a monopoly of providers can lead to higher charges for a service especially when providers realize it is time sensitive as it would be with a driver medical.

14.6 (p.24) Vehicles-specification and conditions

Some drivers are naturally exploring hybrids or electric vehicles and we now have some drivers in Torbay voluntarily embracing the new technology encouraged by Torbays policy initiatives this is a positive move as they felt it fits with their personal requirements. All licensed drivers will without the need for compulsory regulation from Torbay make a natural transition to greener options like they did with the Euro 6 engine as the vehicles and technology available to purchase and operate become more readily available and economically viable. Licensed drivers are on the whole self-employed and thereby mainly profit driven in order to financially sustain themselves and their dependents. Their vehicles already have time limited working lives which ensures they have to renew their vehicle in an acceptable time frame. When they source newer models, they want best value for money so often upgrade to the highest specification they can afford as it's such a big financial commitment. Newer vehicles tend to have been manufactured to incorporate the latest technology thereby moving the trade forward. The current international drive is for manufacturers to develop greener technology to help reduce the industry's carbon footprint and damage to the environment. This is a positive move that should be applauded and globally beneficial to everyone.

The main question is should the move to hybrid and electric vehicles be forced upon drivers within the time scales proposed by Torbay? Licensed Drivers feel this is grossly unfair for the following reasons;

The members think the time scale is unrealistic and fear it will cause great financial hardship to the trade.

The extra cost of purchasing a hybrid or electric vehicle in Torbay will for some not be financially viable if some of the proposed policies come into force by the dates currently recommended.

Those drivers who have changed to electric vehicles tend to have relatively lower milage and cover more localized work than some. Even within this minority they are experiencing range issues that impacts the amount and type of jobs they can undertake in a shift.

Many licensed drivers are opting for a compromise of hybrid or plug in hybrid as range is still a major issue for the majority of drivers. Those within the bay currently moving to electric, hybrid or plug in hybrid tend to be 4-seater cars. These types of vehicles are significantly more expensive to purchase across all ranges and sizes as there is a very limited due to the newness of the technology and also less availability on the second hand market. **Not all drivers can afford this additional expense at this moment in time, some are still trying to recover financially after the unprecedented financial hardship within the trade due to the pandemic.** Some drivers have delayed longer than normal changing their vehicles due to lack of available funds, credit options or from concerns for the future financial stability.

Nationally some individuals have found their credit ratings adversely affected during this time especially as some lenders look unfavorably on borrowers who applied for financial assistance from the Government in one form or another.

Torbay needs to maintain the versatility within its fleet of licensed vehicles if it's going to meet the diverse needs of the general public and meet the requirements of the local authority's own social care and Local Authority school transport needs.

The speed of the proposed compulsory introduction of electric vehicles is alarming to the vast majority of the trade.

The introduction of the Electric or plug in hybrid will also prevent drivers from sharing a vehicle as it will need considerable charging time making this impractical for both drivers. Actually, some drivers may have to reduce their working hours in busy times due to a need to recharge potentially reducing the actual number of drivers available to work in busy periods.

MPV vehicle specification proposed changes

Currently there are very few MPVs in manufacture or development that will comply within the new Torbay specifications in the time scale proposed in the policy changes. For the dates proposed to be achievable both the infrastructure and availability of electric vehicles fit for purpose would have to be rectified.

A range of Hybrid electric MPV's from across the leading vehicle manufacturers are not even in mass production yet so there is no forecast as to availability. Therefore, the proposed changes could mean a driver is unable to renew his MPV due to lack of availability and high purchase price.

It would certainly have a big impact on regular contract work for organizations like the Local Authority Transport department and language school as efficiently as well as larger groups needing a taxi for social reasons. Having to send two cars rather than an MPV is not only more expensive for the customer but also not good for the environment.

If the equilibrium of our licensed fleet changes too drastically due to cost or availability it may have a negative impact on the Torbay economy. Torbay councils' own budget for transporting students to the various special educational provision across the bay and neighboring authorities would also be negatively impacted.

Day trippers, families and their holiday luggage and indeed foreign students are very important to the Torbay economy. The easy with which they arrive travel within the bay during their stay; and ultimately return home will have a big impact on their memories of the bay and influence any future plans to return. It's not just Bed and Breakfast/ Hotel establishments but also host families, shops, transport and a wide variety of attractions and

leisure facilities to name just a few that benefit from the revenue tourists and students generate in the Bay.

The UK is currently experiencing a severe shortage of affordable secondhand vehicles of all types; saloons, estates or MPV's that fit with the Torbay Local Authority specifications.

The proposed changes would mean all licensed drivers Hackney and Private Hire being restricted to a much stricter specification on replacing their vehicles this is especially difficult for hackneys who because of the livery specifications are also restricted to just black.

The TLTA have therefore been asked to submit that the Hackney drivers would like to see the livery conditions for new electric vehicles suspended given the current issue with supply across the world.

The stricter specification on replacing licensed vehicles will have major financial implications at a time when drivers financial resources are already de-plenished after the COVID restrictions. Supply and demand market forces will also drastically reduce the resale or trade in value of our existing petrol or diesel vehicles as they are inevitably; due to the nature of the job; of considerably high milage. Not every driver within the bay was able to access financial support via the local restrictions grant and nor all sectors have been able to benefit from the summer increase in tourists in the bay.

The introduction of the Electric or plug in hybrid will also prevent drivers from sharing a vehicle as it will need considerable charging time making this impractical for both drivers. Actually, some drivers may have to reduce their working hours in busy times due to a need to recharge potentially reducing the actual number of drivers available to work in busy periods.

This is of course assuming the battery continues to function past 100,000 which is still the life expectancy of a battery. While we appreciate the fuel costs would reportedly be reduced over time the higher purchase price may mean the majority of drivers will be forced to finance this move through expensive credit agreements

The lack of an adequate infrastructure was repeatedly echoed by drivers Not all drivers have convenient off-road parking that they can use for personal charging points couple who live in a housing association accommodation have reported back they are struggling to get written permission from the housing association to even have a domestic charging point installed at their home. Those lucky enough to be able to fit individual domestic chargers are unable to have the rapid chargers fitted as the national grid connections to domestic housing is not compatible with such high power use. **The electric training provided by Torbay said it is most cost effective to charge your vehicle for 6 hours over night on a special electric EV Tarif. Unfortunately, that is often not possible as a lot of our work spans this period.**

It is noted that Torbay have secured Funding from the On-street Residential Charge Point Scheme (ORCS) but it is for 10 more public charging sites with initially two 22KW chargers

per car park. They could potentially maximize these to accommodate a further 6 chargers as it is deemed necessary assuming the funds to do so are available when required.

Unfortunately, the minimum for efficient charge should be 50KW this was confirmed at the Electric Vehicle training organized by Torbay Council. We currently have a total of 23 charging points at 13 sites. These sites include within 2 business retail parks, main dealer garages, supermarkets, public houses, hotels, a holiday park and Paignton Sea front. The proposed new sites are also in very public places and open to anyone. **There is no specifically licensed vehicle only charging points within the bay. The trade also needs to have confidence in the wider infrastructure when travelling out the bay to transport passengers to their destination.**

On initial installation of the first batch of charging points from ORCS funding with the existing points we will have a total of approx. 43 across the bay for general use. Even when at maximum capacity after the installation of the extra anticipated charging points we will still only have 103 charging points at 23 different public locations for the general population in the bay.

Of a population of	134,500
16 to 64 years old	76,300
Over 65 years old	35,600

This means we have a population of approx. 111,000 of driving age (with some adjustment as not every adult will drive) while it is unknown how many of these will in fact drive or use electric vehicles. It is logical to assume electric vehicle use will grow steadily as the new technology is become increasingly popular for the average family. The population in Torbay will fluctuate with seasonal ingress from tourists etc. However, it is very reasonable to assume there will be a significant proportion of the population dependent on public charging points.

With over 600 licensed drivers in Torbay all expected to embrace fully electric vehicles within a relatively short time we need high speed charging points at various locations designated for licensed vehicles ONLY.

Perhaps the local Authority could explore ways to encourage local landlords to help facilitate installation of home charging points where this is possible as currently this is cheaper than public alternatives. Unfortunately, the cost of electricity is currently escalating for domestic users this will filter down and effect the EV tariffs as well.

Not only is there likely to be a high demand for the charging points around the bay it will also take far longer to charge your vehicle than to refuel with petrol or diesel. Some will take several hours to achieve a full charge frequent fast charging is bad for the battery life and can affect battery warranty People may connect to a charging unit then go shopping or for a meal etc. while they wait especially given the type of locations the charging points are

sited in. This could leave others waiting for them to return or having to drive around looking for another vacant point.

With the national drive to move to electric vehicles and to use less domestic gas or oil systems in our homes it remains to be seen if the national grid will keep up with demand in the future. The Committee on Climate Change state that as 14% of greenhouse gas emissions come from our homes no new homes should be connected to the gas grid from 2025

There have been many documented negative reports in the press and on television on the significant issues trying to charge these vehicles across the UK. We need the infrastructure in the bay to be drastically upgraded to meet the growth in demand before we are dependent on it on a daily basis. It was noted should the Licensing Department receive repeated complaints of ANY plug-in hybrid or electric vehicle due to running out of range while trying to complete a job it may result in a review of the license issued in respect of that vehicle model. This does not fill drivers with much confidence as it appears to read that a model of vehicle may be deemed unsuitable and removed as an approved licensed vehicle in the future over range issues. **This raises concern as it will be new technology and many factors like weather, weight and road topography can affect range on route including driving style it may take some a little time to adjust to regenerative driving and also finding accessible charging points on route.**

The TLTA request a minimum 50KW charging point but in an ideal world 350KW designated exclusively for the trade to accommodate drivers need to rapidly charge mid shift, before accepting a longer-range fare or just because they cannot charge their vehicle at home in an acceptable time frame.

The TLTA have been asked to submit the drivers would like to see the proposed time scale for stage 1 delayed by two years to allow technology advancements with regard to range and for the national and local infrastructure to be improved.

It is also felt the remaining two stages of 2024 and 2026 should be removed at this point and looked at a later date as technology and infrastructure across the UK improve.

Increased working life

It is noted that Licensing proposes to increase a licensed vehicles working life to a maximum of 15 years for electric to help offset the initial cost of purchase. However, the nature of our trade often means most vehicles do high mileage in a relatively short time.

The vehicle depreciates quickly therefore the proposed extended working life is not much of an incentive for them. The majority of these drivers already change vehicles before they

reach the end of their working life as heavy use takes its toll on the interior of vehicles as well as the engine and other mechanical parts. In fact, some fear it will lower the overall quality of the fleet in the bay and as the technology is still relatively new no one knows its long-term longevity under commercial usage.

The battery warranty offered by most manufacturers is 8 years impressive until you ask the right questions and discover in the fine print it is or 100,000 miles whichever comes first. For some drivers this would be just over a year. A replacement is said to be about £5000 depending on the make. However, some manufacturers do not actually replace batteries at the current time claiming it is cheaper to replace the vehicle. To keep an EV battery healthy and extend longevity it is recommend you should

1. Minimize exposure to extremely high temperatures when parked. ...
2. Minimize the batteries at 100% state of charge. ...
3. Avoid using fast charging. ...
4. Control the optimal battery state of charge during long storage.

When questioned in more depth the Vauxhall Sales representative said repeated fast charging which means only having the vehicle plugged in for the faster first 80% of charge rather than for the full charge as the remaining 20% is what actually takes the time could invalidate the battery warranty. The battery charging history is stored in the vehicles on board computer system. This would pose a dilemma for licensed drivers who need to keep their vehicles on the road for the maximum working time. It is also recommended as highly important to garage the vehicle overnight especially in cold weather as this also has a big impact on range. As does the use of electrical equipment like data heads, satellite navigation systems and even use of the radio, heater, air conditioning, lights, windscreen wipers etc. Weight from passengers and luggage speed and other driving conditions can significantly diminish range again this is not ideal for lots of drivers in the trade especially MPV's. **It is also recommended we should avoid charging a car straight after a long drive to give the batteries chance to cool down first. This is going to be impractical for airport drivers who need to cover long distances between airports etc within a tight time frame.**

14.23 (p.27) Vehicle Compliance Testing

Points 14.23 and 14.24 have been removed although the specifications of a vehicle being no more than 4 years and no more than 50,000 miles at first application remain in place in the application table on p24 under Specification and conditions. The only change to the 14.23 is to extend the vehicle age in line with extended working life. However, the TLTA would like to reiterate causing a monopoly of compliance providers leaves the council at risk of being seen to show favour and it could encourage increasing costs. Further information on how local garages be able to apply to be an approved garage for compliance testing would help reassure drivers as would some local authority recommendations for cost of these additional checks. We do appreciate this is a national directive from Government and that Torbay are trying to implement this the best way they can.

14.39 (p. 29) Door signs

There is an objection from some drivers who do not want to have their phone numbers on the vehicle door signs because they do not use their number to seek work. This may be because they offer an executive bespoke service or because they do contract work only or only offer a restricted service and they don't want to be disturbed late at night by random calls but may have to keep the phone on for their regular clientele.

As for having a landline displayed with the move towards new technology less and less people actually have a landline but rely on mobiles. This would generate an additional unnecessary bill if they had a landline just to comply with this bylaw.

In fact, traditional landlines are set to be axed from 2025 as the UK's telecoms industry makes the switch to digital calls. In just over three years all households and businesses will need the internet or a mobile phone to make calls.

Vehicles can easily be identified by the use of pre booked door signs or Hackney roof signs in addition to this is the colour of the plate Blue for Hackney and Red for Private Hire. The majority of Private Hire firms use an App which text the name of the driver, brief description and the number plate of the vehicle attending before it arrives at the pickup point.

The TLTA have been asked to submit the drivers would like to submit that as long as a vehicle is clearly identifiable to members of the general public it should be left up to the operator if they choose to include a number. It should be their choice if they wish to pass up this opportunity to generate extra work through advertising their number. A landline or a mobile should be acceptable as this is the way technology is being encouraged to move.

Appendix D (p.58) Licensing of 6-seater vehicles

The wording with regards to the egress and seating is a little confusing to most and could be interpreted as applying to the typical 9-seater minibus as the passenger middle seat is traditionally folded or adjusted in some way to allow access to the rear 3 seats. Perhaps the wording could be amended for greater clarification.

It is acknowledged the LA have removed the dimensions for the boot space in a vehicle but require provision for carrying the number of people with sufficient luggage the vehicle is licensed for. There isn't one size for suitcases so very subjective and open to interpretation as to what constitutes sufficient luggage space for 6 passengers.

They do however fulfil an important role in the diversity of the overall fleet as they bridge the gap between a car and a minibus for slightly larger families or groups of maybe 5 or 6 people. It is very hard for a single parent to use two vehicles as it's not always appropriate for younger children to travel without an accompanying adult.

The egress out of 6-seater vehicles as been deemed acceptable by the Department for Transport Vehicle Certification Agency (VCA) or they would not be in production. Many people own and happily use these vehicles across the country. It is acknowledged it is how the vehicle is used in real life situations. It is a very complex area and very difficult to regulate. Some models on the market have fully independent seats which are more accommodating than some models to rearranging to fit a wide variety of loading configurations.

The other danger with tighter vehicle specification is drivers may out of financial necessity look to cross boundaries and some are already looking at the specifications in neighboring authorities like Teignbridge and South Hams. National companies like Uber and Ola may well look to exploit this situation as they look to expand across the country. This is already happening within the bay causing frustration and some ill feeling amongst some Torbay licensed drivers.

This would reduce the licensing department's ability to carry out spot checks on vehicles and their ability to influence, maintain standards and control of the licensed drivers working within the bay.

The TLTA have been asked to submit the drivers would like to suggest this is subject to further research and that the suitability of models be explored by a steering group made up of the Licensing department Manufacturer representation and the TLTA.

As an association with national links the newly reformed TLTA wish to be recognized as important stake holders within the trade in Torbay and declare an interest in working with Torbay and other voluntary and statutory agencies to support and develop new initiatives and future planning in this field.

We are keen to safeguard passenger and driver safety while maintaining the professional reputation of our trade.

