

TULDA response to the Consultation on HC & PH licensing Policy April 2022.

Reduction to 3 years for car on first application.

In order to formulate this collective response on behalf of the Taxi trade in Torbay given the relatively short notice we were forced to canvas drivers via an open public meeting, TULDA members only page, email and phone contact local taxi social media sites. In the current economic climate where the drivers are still struggling with rapidly escalating operational costs, we feel reducing the maximum age at first application as a licensed vehicle is placing unreasonable AND unnecessary burden on drivers as set out in Regulators Code 2014

The Statutory & Best Practice Guidance for taxi & PHV Licensing also states decisions must be reasonable and proportionate.

We acknowledge Torbay wish to avoid issuing a license to a petrol or diesel vehicle that will run past their 2030 target for a fully electric only fleet, however as it is proposed to alter parts of the policy it would be possible to state regardless of age by 2030 Petrol and Diesels will ne longer be deemed acceptable as a licensed vehicle.

If a review of the local and national infrastructure identifies it is still insufficiently developed to guarantee adequate support for the commercial use of electric only taxi fleets the target dates for a fully electric fleet of li censed vehicles in Torbay will have to be deferred anyway.

It is important that the licensing department recognize the nature of our industry dictates that drivers are predominantly profit led therefore it is reasonable to expect a gradual voluntary transmission by the vast majority of drivers to electric as it becomes more financially viable.

Reduction of working life to 8 years for Diesel and petrol

For the same reasons drivers feel it is unreasonable to reduce the working life to 8 years for a vehicle working life as it was only recently increased to 10 years. Given that Torbay feel it is acceptable for a fully electric vehicles working life to be 15 years it is hard to justify this disparity. Even if the engine and body parts were more durable the interior is likely to need replacing long before that age if it is not to show substantial signs of wear and tear which may significantly impact on the overall quality of the fleet.

Mandatory facility for Card payments.

We are concerned that a driver may be disciplined if he asks a passenger to pay by cash if card payments become mandatory.

While we accept a driver should take steps to be able to offer this option to customers. Some drivers may require practical assistance as they struggle to learn how to operate what will be relatively new technology to them. In deed some more mature drivers and those with personal issues like dyslexic etc. are still currently struggling with the online applications and renewals. TULDA have and will continue to offer peer support and signpost to other relevant departments etc. as necessary.

It should also be noted that in some circumstances card machines may genuinely not work due to technical issues such as not being able to get a live internet signal.

We cannot move to a totally cash less society until there are significant improvements to the national internet coverage and a willingness for the more mature elements of the general public to forgo physical currency.

Drivers cannot just drive off and wait for a signal to send the payment request as it may be rejected by the passenger's bank. It would be too late to return and relocate the passenger in order to seek an alternative payment method. Therefore, drivers must have the right to warn passengers that a cash payment MAY be necessary especially if the drop off point requested is known to have poor signal strength, without fear of being reprimanded.

Removal of Conversion Systems

With regard to 2.6 in the HC & PH Taxi Policy

To Encourage Environmental Sustainability:

- Investigate alternative fuels **and conversion systems**;
- Investigate the potential for providing an environmental levy or reducing licence fees for cleaner vehicles;
- Involve Taxi Trade in identifying ways to reduce vehicle emissions;
- Consideration of suitability of vehicles that are unable to comply with Euro

Technology (or equivalent standard) requirements

We would like to reiterate the following points made in the earlier consultation submitted by Jacqui Nickels on behalf of drivers.

Technology is developing at a rapid pace so all options regarding alternative fuels and Conversion systems to enable existing cars to convert to these new fuels should remain on the agenda. It would be detrimental to the environment and economy to have widescale scrapping of serviceable vehicles if their useful life can be expanded by simply converting to a new fuel system should one become a viable option.

The Euro 6 diesel engine currently used in some licensed vehicles, is compliant with current Euro standards and meets current ULEZ requirements. Drastically subsidizing fully electric vehicles over the Euro 6 could be seen as an unfair commercial advantage. As the option to go fully electric is not a financial or reasonable option for some vehicles like the minibuses predominantly doing longer distance work at this point in time.

It was also submitted that allowing Torbay Taxis and Private Hire to use the bus lanes would reduce the trades carbon footprint and benefit the general public by facilitating shorter journeys in some instances.

Mandatory hard wiring of Hackney roof signs to light up when not on a job.

We acknowledge a lit sign is a useful indicator that a Hackney vehicle is available for hire however there are other considerations to take into account in this matter. As a Hackney you are allowed to do Private hire work you would not want to have your roof sign lit up when you are off to your next private hire job. Therefore, some of our members feel it would be better to be hard wired in to a switch for such occasions.