

13<sup>th</sup> April 2022

Dear Sirs

We are writing in response to the consultation on the proposed changes to the Torbay Council Licencing policy.

You have asked for responses to the following changes,

**1. To allow the use of an alternative medical provider (D4 Medicals).**

We agree this is a positive move as drivers can, at times have lengthy waits to see their own GP and the costing varies, in some cases as high as £150. It was noted that more than one alternative could be offered to give drivers a wider choice.

**2. Removal of Minimum Boot Space and Egress wording to allow more 6-Seater vehicles.**

The majority of the trade did agree with this change, due to the declining fleet of 6-seater vehicles that we can licence, we have found the use of cross border hirings have seen a decline in work around Torbay for multi-seater jobs. We feel, being able to licence these vehicles again would be a positive move for the Trade as work would be kept local.

**3. Compulsory £5million Public Liability Insurance for all Drivers.**

The majority of the trade agreed that Public Liability Insurance is needed and those that do school contracts have to have this included in their insurance policy anyway. The cost of the liability insurance in comparison to the costs involved in defending a claim made against a driver, we feel this is a change that would benefit the trade.

**4. Electric Vehicles only from 2030 with a review in 2027.**

After extensive consultation with the trade both in August 2021 and March 2022, the majority agreed with changing the implementation of Electric vehicles only from 2026 to 2030 as we felt that there isn't any infrastructure in

Torbay and given the vast amount of charging points that would be required, coupled with Governments targets, 2026 is too close to achieve even half of what would be required.

This change, together with lowering the life of a licenced vehicle back to 8 years, is a more realistic timeline to achieve the targets set by the Government.

**5. Reducing the age of a new licenced vehicle to 3 Years and removing the maximum mileage of a vehicle.**

The majority of respondants agreed with this change, especially with removing the maximum mileage allowed as this gives drivers more choice when choosing a vehicle. There were a few concerns from the Hackney Trade due to the livery policy currently in place. Some suggestions were to remove the maximum mileage as proposed but to keep the current age limit at 4 years.

**6. Hackney Vehicles must offer a Card Facility (no minimum charge)**

The majority of respondants agreed with this change. A positive move that would bring uniformity across the trade. Some of the respondants had concerns that some drivers are not as tech savvy as others and may encounter issues with setting up readers etc, it has been suggested that drivers are allowed 6 months to implement the change rather than the 4 months proposed.

With Thanks

Ray Hall

Torbay Licenced Taxi Association