

## General Purposes and Licensing Committee– 10 January 2025

### Taxi Policy Review

Purpose	For decision
Classification	Public
Executive Summary	<p>The Licensing Authority has drafted a revised Taxi Licensing Policy to provide a robust, fit for purpose policy, in line with current statutory guidance.</p> <p>Following a public consultation on the draft policy, amendments are proposed for consideration by Members prior to adoption at Council.</p>
<b>Recommendations</b>	<b>That the General Purposes and Licensing Committee review the responses received during the consultation and agree the subsequent amendments to the draft Taxi Policy, recommending approval by Council in February 2025.</b>
Reasons for recommendation(s)	Licensing Authorities are required to publish a Policy for applicants, licence holders, the public and decision makers.
Ward(s)	All
Portfolio Holder(s)	Cllr Dan Poole
Strategic Director(s)	Richard Knott – Strategic Director of Housing & Communities
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## **Introduction**

1. A report launching a review of the existing Taxi Licensing Policy, was taken to the General Purposes and Licensing Committee on 5 January 2024. Members agreed approval to consult on the proposed changes in a draft Taxi Licensing Policy between 15 January 2024 and 15 April 2024.
2. The Council, as the Licensing Authority, consulted widely with all those who would be affected by the new policy. This included taxi and private hire licence holders, neighbouring authorities, unions representing drivers, Councillors, Town and Parish Councils and the public.
3. A significant number of responses were received during the consultation period, and these have been fully considered when proposing the amendments to the policy in this report.

## **Background**

4. The proposed Taxi Licensing Policy provides a clear statement of how this Licensing Authority intends to carry out its statutory duty with regard to the licensing of drivers, vehicles and operators and providing transport to members of the public.
5. The proposed policy has been reviewed and updated following changes to legislation, best practice and statutory guidance. It is intended to promote public safety and protection of the vulnerable and provide an accessible taxi service, whilst taking steps to improve the environment and promoting the local economy.
6. The document sets out a framework of standards to which the Licensing Authority will have regard to when undertaking its regulatory duties.
7. The policy is an integral part of a Local Authority's decision-making process; informing and guiding officers and members to make decisions which are fair, clear and consistent.
8. In undertaking the review of the taxi licensing policy, officers gathered information across Hampshire and other neighbouring authorities to benchmark standards on ages of vehicle licensed, requirements for wheelchair accessible vehicles, assessments of vehicles and door signage. (Appendix 2 and 3)

9. This policy is dynamic and will be reviewed periodically to ensure that it reflects current best practice and recent case law, changes in technology, social climate, and vehicle specifications.

### **Summary of the fleet**

10. NFDC, as the Licensing Authority currently license 620 drivers, 560 vehicles (hackney carriages and private hire vehicles) and 81 private hire operators.
11. The fuel types for vehicles on the licensed fleet are as follows;

Diesel	Hybrid	Petrol	Electric
358 (64%)	167 (30%)	26 (5%)	9 (2%)

12. The current age of the licensed fleet is as follows;

Age	Hackney carriages	Private hire vehicles	Total	Percentage
5 years and over	82	335	417	76
Under 5 years	25	118	143	26
Total	107	453	560	100

13. Drivers currently licensed are from the following locations:

30% are New Forest residents
43% are from Southampton and Eastleigh
Over 25% are from other areas including Bournemouth, Dorset, Portsmouth and further afield including Reading, Kent and Croydon

### **Consultation**

14. The consultation was designed to gain feedback from the taxi trade, relevant agencies and organisations and the public on the changes in the draft Taxi Licensing Policy.
15. The consultation period ran for 12 weeks from 15 January 2024 to 15 April 2024 and involved an online and paper consultation survey, plus an option to comment directly by emailing the Licensing Team.
16. In total 73 responses were received, specifically 63 online submissions and 10 responses via email, as well as a face-to-face meeting with trade representatives.



vehicles at the current time. The recommendation is in line with guidance on emission-based standards rather than age limits.

### **Age of vehicles on the existing (on licence renewal) fleet**

22. Existing policy : No age restrictions on existing fleet.  
Proposed policy : From 1 January 2026 only those vehicles less than 10 years old will be renewed.  
No age restrictions on fully electric vehicles.

Number of responses in favour of the proposal	2
Number of responses not in favour of the proposal	7

23. Recommendation:  
All vehicles currently licensed are not subject to upper age limits or emission standards. However, any replacement vehicle for one already licensed, will become subject to the Euro 6 emission standard from 1<sup>st</sup> January 2026.  
Amendments to the policy: 2.3 and 3.0 of Appendix F

24. Reason:  
Concern was raised from the trade on the financial burden of replacing vehicles which had been regularly serviced, had replacement parts for key components and still passed annual MOTs. They stated that many vehicles would be purchased on financial agreements over 5-6 years and so ordinarily would not give them any pay back until years 12 to 15. The original proposal would impact them economically. Based on the nature of the district, it is essential that an accessible and viable taxi fleet is provided for our communities. Safety standards of vehicles will continue to be maintained through 6 monthly assessments of older vehicles.

### **Ages of wheelchair accessible vehicles (WAVs) in the current fleet**

25. Existing policy : No age restrictions on new and existing WAVs.  
Proposed policy : Same age restrictions as proposals for new and existing vehicles on the fleet.

Number of responses in favour of the proposal	0
Number of responses not in favour of the proposal	7

26. Recommendation:  
WAVs will not be subject to any emissions or age criteria.  
Amendments to the policy: 2.3 and 3.0 of Appendix F

27. Reason:  
 Following a review of the consultation it is likely the WAV proposal would have a negative impact on the provision of WAVs in the fleet, based on the current age of vehicles and the expense to replace WAVs due to specialist suppliers required to fit the vehicles (particularly minibuses). There was also the potential negative impact on school transport, increasing cost and reducing availability. The recommendation meets the best practice guidance, in supporting the wheelchair accessible provision within the Forest and may also incentivise drivers to purchase future WAVs based on their being no age restriction for new vehicles.

### Mid Term Vehicle Assessments

28. Existing policy : Vehicles of 8 years and older to have 6 monthly assessments.  
 Annual assessments for all other vehicles.  
 Proposed policy : Vehicles 5 years and older to have 6 monthly assessments.

Number of responses in favour of the proposal	1
Number of responses not in favour of the proposal	8

29. Recommendation:  
 No change to existing policy. Vehicles that are 8 years and older from the date of first registration will require twice yearly testing. Annual assessments for all other vehicles.  
 Policy: 2.4 and 2.1 and 3.2 of Appendix F.
30. Reason:  
 MOTs will ensure vehicle roadworthiness and safety is maintained and therefore the additional assessment is not considered necessary. Annual tests whatever the vehicle age, are in line with current guidance and other compliance methods are available to address poor quality vehicles.

### Door signage on private hire vehicles

31. Existing policy : no requirement for door signage on vehicles.  
 Proposed policy : self-adhesive NFDC identification signage to be affixed to each of the rear passenger door panels of a private hire vehicle (unless an individual exemption is granted for a vehicle) stating that the vehicle must be pre-booked and also makes clear the vehicle is licensed by NFDC.

Number of responses in favour of the proposal	4
Number of responses not in favour of the proposal	39
<p>However, 7 comments refer to executive vehicles which would be exempt if they meet the Council's exemption criteria and carry out executive work only.</p> <p>In addition, a number of responses (6) mention operator signage, but the proposal is only for signage that identifies the vehicle as being for pre-booked journey only and is licensed by NFDC.</p> <p>A large number did not offer reasons for an objection to the proposal whilst some respondents felt that the existing external and internal plates were sufficient to identify a vehicle.</p> <p>Others commented on the aesthetic effect on their vehicles.</p>	

32. Recommendation:

Door signage is affixed to each of the rear passenger door panels of a private hire vehicle. Executive vehicles are exempt from this requirement (example sign is shown at Appendix 5).  
Amendment to the policy: 2.7 and 9.15.2 of Appendix F.

33. Reason:

Whilst there were many responses against the proposal (particularly from those operating via an app (uber etc.) or residing further afield and not operating in the district), it was considered that the safeguarding benefits outweigh the opposition to the change. During the consultation meeting a proposed sign example was shown to local non-app based operators who gave broad agreement. The signage assists in differentiating between private hire vehicles (must be pre-booked) and taxis (can be hailed). It improves identification for the public and any enforcement agencies, informs the public that a booking is required and ultimately improves safeguarding for the public. The signage further supports partnership working as the recommendation is in line with many neighbouring Licensing Authorities and does not limit a driver or vehicle from working for one or more operators, or outside of the district. It is also in line with best practice guidance which states that private hire vehicle signage requirements should be limited to the authority licence plate and a "pre-booked only" door sign.

## **CCTV provisions for licensed vehicles**

34. There are no requirements in the draft policy for CCTV to be installed in licensed vehicles, and as such no consultation questions were posed. However, the Council is clear that the safeguarding of the public and drivers remains a priority so will keep the matter under review.
35. The installation of CCTV is required to be evidence led so further consideration will be given to the cost of the equipment for vehicle proprietors and implications on the control of data, in line with ICO requirements. Following the outcome of this future review, further consultation will be undertaken.

## **General Comments**

36. It is recommended that general comments including those on tinted windows, driverless cars and safeguarding training providers are noted but no further amendments made to the policy.

## **Corporate Plan Priorities**

37. The adoption of the Taxi Licensing Policy is a statutory requirement and relates to the following corporate priorities.

### **Theme**

38. Empowering our residents to live healthy, connected and fulfilling lives.

### **Corporate Plan Objectives**

39. Protect and improve the health and wellbeing of our communities.

### **Service Objectives**

40. Adoption and implementation of the Taxi Licensing Policy.

### **Option Appraisal**

41. It is recommended that the following options are considered:
42. **Option 1**  
For the General Purposes & Licensing Committee to accept all of the proposed recommendations to the policy (version 2) at Appendix 1, following the consultation process and recommend the revised Taxi Licensing Policy for adoption by Full Council. All other content of the



draft policy to be agreed. This is the preferred option as it is a requirement for the authority to publish a Taxi Policy.

43. **Option 2**

For the General Purposes & Licensing Committee to accept some of the proposed recommendations to the policy following the consultation process and recommend the revised Taxi Licensing Policy for adoption. This option is not recommended.

44. **Option 3**

For General Purposes & Licensing Committee to reject the proposed recommendations and not adopt the proposed revised Taxi Licensing Policy, reverting back to the current policy. This option is not recommended.

### **Introduction of Policy requirements**

45. All approved amendments will be introduced from the date of adoption of the policy. However, the requirement for door signage on private hire vehicles (non-exempt) will be implemented from 1 April 2025 for all new or renewed private hire vehicles. Information and the new policy will be provided on the Licensing web pages and private hire operators and proprietors notified of the key changes and where to refer to the new policy.

### **Financial and resource implications**

46. Taxi licensing fees are required to be set to recover costs and fees are currently under review to reflect the impact of any approved amendments to the policy.

### **Legal implications**

47. The policy has been updated to reflect Statutory Standards and best practice guidance. The policy states the way in which the Council will undertake its statutory duties with robust and consistent decision making, thus ensuring fairness and transparency for the trade and the public. Decisions on individual licensing matters determined under the policy are subject to appeal to the Magistrates' court applying the relevant law.

### **Crime and disorder implications**

48. Taxi licensing is governed by legislation on criminal offences for illegal activities. The policy includes increased standards and further guidance on enhanced Disclosure and Barring Service checks, a

code of conduct, fit and proper person checks and the convictions policy.

### **Environmental/Climate and nature implications**

49. The requirement for new vehicles on the fleet to be Euro 6 compliant will have a positive effect on environmental and climate actions. Furthermore, the policy may encourage more electric vehicles on the fleet as there are no age restrictions on these vehicles.

### **Equalities implications**

50. The policy has been updated in line with Statutory Guidance which the DfT will have completed its own impact assessment on. Accessibility for all social groups has been considered when revising the policy.

### **Data protection/Information governance/ICT implications**

51. There are none.

### **Conclusion**

52. The primary and overriding objective of the licensing policy is to protect the public, as well as the provision of an affordable and accessible service and consideration of local requirements to support the trade and help protect the environment.
53. The unique nature of the New Forest has been considered when drafting and reviewing amendments to the revised policy. The taxi trade plays an essential role in the transport network across the district, particularly with vulnerable members of the community and based on the rural nature of parts of the district.
54. A large number of comments were received during the consultation process and where concerns were raised, the council has taken these into consideration, when recommending further changes to the draft policy.
55. The proposed changes to the draft policy, following the consultation process, have considered the potential financial burdens for the trade and should provide confidence to them and the public that an accessible and safe service continues to operate across the New Forest.

56. The age of vehicles and emissions standards will be kept under review and revisited through consultation at an appropriate time in the future.

**Documents referred to:**

Statutory Taxi and Private Hire Standards.  
July 2020 - updated November 2022

[Statutory taxi and private hire vehicle standards - GOV.UK](#)

Taxi and Private Hire Licensing Best Practice Guidance for Local Authorities in England- updated November 2023

[Taxi and private hire vehicle licensing best practice guidance for licensing authorities in England - GOV.UK](#)

**Appendices:**

Appendix 1- Draft Taxi Policy v02

Appendix 2- Benchmark document New vehicles in Hampshire

Appendix 3- Benchmark document existing licensed vehicles in Hampshire

Appendix 4 - Overview of consultation responses

Appendix 5- Proposed sample of door signage