#### Comments

#### Age restrictions for new vehicles

This is a very contentious subject in the taxi and private hire industry, not just in the New Forest but all over the UK so please forgive me but I must make my points and feelings clear.

I need to firstly say that if you neglect your responsibility as our licensing authority by not listening to all stake holders and ploughing through you WILL put the finances of families at risk all over the New Forest which potentially will add increased pressure on the already stretched benefits system to bridge the gap financially as families will simply not be able to survive. This will also majorly effect peoples mental health through stress and worry and will certainly add increased pressures onto the health service when it can simply be avoided. Not all drivers in the New Forest are attached to a company who are supplying them with regular work, most drivers work for themselves and they go to work every single day in order to put food on the table for their families. If you insist on implementing this upper age limit all drivers and drivers families will suffer. Operators will inevitably have to change their vehicles once they become 10 years old and new vehicles are not cheap and so they will have to take out finance, this will suffocate individuals and businesses with extra costs. We are still in the middle of a cost of living crisis where we are all struggling as it is, let alone adding extra costs for vehicles and burdening families with extra costs is going to majorly effect people. Not all operators may even be able to get the finance for new vehicles and so you will be backing them into a corner and they will have to either come out of the industry due to the extra costs or you will force them into operating illegally in order for them to make any money, this obviously has untold effects both on the public and the driver involved. If we put ourselves in the shoes of new potential operators and drivers looking at being licensed in the New Forest, they will go elsewhere due to the tight restrictions in place and so NFDC will be limiting themselves from the potential extra income that comes from new drivers and operators. I note from the GP & I. Committee meeting held on 8th March 2024 it was mentioned by the officers that the council need to try and get money back (this is going to be done through an increase in all fees). Surely if NEDC make this major change, new and existing drivers will go elsewhere. This will then mean NFDC will not be able to get as much money back as expected. Drivers and operators looking at coming into the taxi and private hire industry will get licensed with surrounding authorities for a variety of reasons in addition to the points above. If we look at Southampton City Council (SCC), they have a similar policy to the one proposed by yourselves but that's where the similarity's simply stop. Once you step into the SCC authority region there are many more pubs, bars, clubs, restaurants, hotels as well as an extremely large student population from both universities and colleges alike. There is also a European airport as well as 5 international cruise terminals which are all serviced by SCC licensed vehicles. All of these locations are within a circa 8 mile radius of the centre of Southampton and so they are very quick to get another job. Drivers and operators in Southampton therefore have more potential to make money compared to the New Forest area. In the New Forest there is a far bigger area and so a less concentrated amount of venues to service, as you can imagine this has a greater impact on how much money can be made in the New Forest in the same time as it would take in Southampton. Another note to take is that of 'cross border hiring'. In short this is where a driver and vehicle is licensed with one authority but works somewhere else. This is mainly used by certain 'app based' private hire companies. If I once again make note to the same appendix as before "Maintains a professional fleet for local customers and visitors to the area and raises standards". I know for a fact that many tourists as well as local people to the area use the same 'app based' private hire companies. This instantly overrides you're reasoning for this change in policy because drivers and their vehicles can work in the New Forest and so they will be servicing the same customers. Customers do not know and many don't even care where these vehicles are licensed. Many passengers just want to be picked up and taken to their destination and they don't care how they get there. All they worry about it the cost and reliability of the service, this can come from anyone.

If NFDC were to go ahead and introduce an age limit of 10 years we would obviously have to renew certain vehicles in our fleet. We would have to buy brand new vehicles so that we get the full 10 years on the road. We recently sold one of our minibuses for £7,000.00. If we use this as an example for renewing our fleet. The factual cash price to buy a brand new equivalent minibus would cost us £57,000.00. us, like many other operators don't have major cash reserves so we would need to finance the difference of £50,000.00. With cost of interest, this vehicle would then cost us £62,500.00. This is just over £1,000.00 per month over 60 months. This is an extra £1,000.00 on top of all other costs to drive this vehicle and the cost to live. This cost for us, as well as 95% of other people is just unreachable. If we look at an example for replacing a car. The cars that we have would sell for around £6,500.00. A brand new equivalent vehicle would cost us £30,000.00. With cost of finance this would rise to £40,000.00 which works out to be just over £65,000.00. A brand new equivalent vehicles and so they warrant a higher cost to buy. If we were to sell one of our executive saloon cars we would get around £20,000.00. To buy a like-for-like perlacement it would cost at least £120,000.00. After finance this would rise to £140,000.00 which works out to be a staggering £2,329.83 every month. Many operators do not make this as profit at the moment so it is guaranteed that they would be put out of work due to not being able to afford a new vehicle. I can only speak for ourselves but we do not keep running vehicles until the end of their lives, us like many other operators and drivers change vehicles periodically not only because of their age and general condition but if you were to imagine driving your personal vehicle for 10 hours a day I'm sure you would soon get bored of the same car. Taxi and private hire drivers are just the same, as soon as it becomes affordable and all external factors such as interest rates, vehicle pric

I would like to bring a few manufacturers to your attention. Firstly, Mercedes-Benz make the Vito. This is a well-known and highly used vehicle in the taxi and private hire industry up and down the country. The current Vito shape has been around for the past 9 years and I'm sure it will continue to be sold. Secondly, Renault make the Trafic. This is also a highly used vehicle in the industry. The current shape has been in service since 2015 and is still for sale brand new today in the same shape. I his shape has been around for the past 9 years and I'm sure it will continue to be sold. Secondly, Renault make the Trafic. This is also a highly used vehicle in the industry. The current shape has been in service since 2015 and is still for sale brand new today. Lastly, Toyota make the Prius. The current shape has been in service since 2019 and part from the points above that vehicle remains unchanged from 2014 to the current day. Lastly, Toyota make the Prius. The current shape has been in service since 2019 and the part of the past 9 years on the same shape. I hope you can see from the points above that vehicle manufacturers rarely change vehicle shapes, they keep the same shape vehicle because they are tried and tested and they are accepted well by users. As mentioned, many of these vehicles look the same regardless of age but would instantly be un-licensable if NFDC were to introduce an upper age limit. If I were to have a 2015 Mercedes Vito I would have to sell that and buy the exact same looking vehicle for no other reason than age. If I may quote an extract from your proposed policy "Maintains a professional fleet for local customers and visitors to the area and raises standards" as I have mentioned potentially vehicles from 2015 will still look 'professional' as they still look the same as the current as these points made will make a major change to the proposed licensing policy.

In comparison, all vehicles first registered after 1st September 2015 are certified as having a euro 6 diesel engine. So when you state "after 1 January 2026 only those vehicles less than ten (10) years old will be renewed" this means that some euro 6 vehicles will be barred from being renewed although they still have clean engines. Transport For London (TFL) demand all vehicles driving into greater London (Not central London and the congestion charging zone) be either euro 6 diesel or euro 5 petrol and above. Subsequently these same vehicles can drive into greater London free of charge, if this is good enough for TFL who look after all transport provisions in the most populated city in the UK and one of the most populated cities in the world why isn't this good enough for NFDC. I know for a fact TFL were offering a cash incentive up to a maximum of £7,500.00 for hackney carriage drivers to give up their older diesel taxis in order for them to acquire a new electric taxi. I know NFDC cannot do the same but one thing you can do as our licensing authority is not pursue an age limit so that we are afforded more time to make more money with our vehicles. I can only speak for ourselves but we only operate euro 6 vehicles, every year we put these in for test with VOSA and they pass both the mechanical check and the emissions test. I note you ropposal the following extract "assists our clean air strategy (currently in development)" I have a couple of issues with that reasoning, firstly I note you say "currently in development". Firstly, from this statement you haven't actually got a clean air strategy/policy so why are you including this as a reason for change in the policy. My second issue is that all vehicles used on UK roads are subject to the same emissions tests as set out by VOSA. Anyone can drive to the New Forest in a highly polluting vehicle and add to the pollution, whereas if you implement this policy taxi and private hire drivers will be stopped from driving their licensed vehicles on the same roads in the

I have done some extra research with regards to age limits with other local authorities and the findings are interesting. Over half of the local authorities I researched do not have an upper age limit, surely this must mean something to you. I also know some other authorities around the country are looking at actually removing the upper age limit in their policies, surely this shows you that they are considering peoples futures and keeping a reliable and cost effective taxi and private hire service in their regions.

I would like to quote an extract from the government website on the best practice guide for Taxi and private hire licensing as follows. Vehicle age limits 8.28 The frequency of testing required (see 'frequency of vehicle tests' above) 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 and 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 five-year-old used electric vehicle will produce less emissions than a new Euro 6 diesel or petrol fuel 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. 8.29 Licensing authorities should not impose age limits for the licensing of vehicles but should consider more targeted requirements to meet its policy objectives on emissions. Safety rating and increasing wheelchair accessible provision where this is low.

In short, we wholly disagree with the upper age limit of 10 years. Instead, we would encourage NFDC to pursue the emissions rating of vehicles rather than age

All petrol or diesel vehicles must be less than five (5) years from the date of first registration, at the time of initial licensing.

We understand the rationale behind this new condition and welcome efforts to ensure that there are more electric vehicles on the road and in maintaining a high standard in the condition of vehicles

In our recent driver forum, this age limit was raised as a concern by many of our drivers. Over 75% of our licensed drivers in New Forest have vehicles over the age of five years and this condition may place a financial burden on drivers who are not able to afford a new vehicle. In addition, the average age of a vehicle in the UK according to the DfT is 9.1 years. Therefore this new condition may deter new PHV drivers from entering the market. During our driver forum, drivers also expressed concerns that this age limit would impact the availability of Wheelchair Accessible Vehicles in New Forest. We agree with the proposals to test the condition and standards of vehicles every six months as an alternative but also recommend further engaging with operators and drivers on a range of options to ensure that there is a balance between maintaining the condition of vehicles and the burdens placed upon drivers.

Age of vehicle should not matter providing it is in good condition and passes inspection. If the policy change goes ahead I will need to buy a new vehicle sooner than planned which may prevent me continuing to hold a private hire licence.

The age limits will mean that it will be harder for new drivers to register

Please think about drivers situation as some of the draft policies will make drivers to buy new car. And most of them can't afford!

Some vehicles are very old and outdated. New forest district council should make changes of newer vehicles for drivers

It's Good that vehicle policy is changing as some of the cars were very old.

Vehicle age should not be very old.

My vehicle is 9 years old and it's as good as new. Every 6 months test feels like just making more money for the council and wasting drives time. Life is already tough enough with the cost of living and inflation.

Vehicle can be same standards as Southampton.nfdc registered vehicles seems to ne more older vehicles then Southampton so vehicle age limit would be good.lots of southampton registered drivers complaining that when vehicle is too old to plate in southampton, drivers going to new forest to get plated and working in southampton and most living in southampton. Also cctv should be compulsory

I strongly object to the proposed implementation of the new licensed vehicle age limits. Five years at first presentation is reasonable but for those of us operating vehicles older than 8 years, the six monthly test is sufficient and provides adequate opportunity to ensure safety and cleanliness standards

The thing that i really cannot agree with is the maximum 10 year age of any vehicle from 2026. This will put owners like myself out of business overnight as I cannot afford to replace my vehicle and moreover should not be expected to, providing that it continues to operate within the rules set down by both yourselves and DVLA.

The current cost of living crises has no signs of improving in the foreseeable future. This means that not only do we drivers struggle to survive day by due to increased costs for business running and personal finances, it also means that there are much reduced customer numbers so its lose lose all around. To be expected to provide a newer vehicle at this time/period is completely out of reach.

I implore you NOT to implement this new rule at this time. Vehicle standards on the current rules are perfectly sufficient, and MOT tests ensure pollution from vehicles is kept to safe levels.

Firstly, the economic impact on taxi drivers should taken by the NFDC into account. Many drivers have invested in their vehicles and may face financial strain if NFDC renew only less than ten years old vehicles after 1st January 2026

Additionally, above ten years older vehicles (especially Euro 6 cars) can be well-maintained and meet safety standards through regular inspections.

Moreover, the environmental aspect should considered by the NFDC. By allowing well-maintained vehicles beyond the 10-year limit, we contribute to sustainability by reducing unnecessary waste and the environmental impact of manufacturing new cars.

I am a private hire driver, please consider the maximum age from 10 to bit longer as drivers are already struggling to make ends meet, and cars under 5 years old cost a fortune to buy please consider cars with newer engines like Euro 6 instead of the age requirement because brand new cars have the same Euro 6 engine's and these engines start from 2015 if you consider the engine over age driver can buy good cars on newer technology engines instead they go for high mileage under 5 years old cars as the market is really high for under 5 years old car's and also PHV vehicles do not need door stickers, PHV vehicles already have front window stickers and license plates at the back please reconside as the vehicle's will look ugly, Thanks.

Age limit and door stickers is unreasonable.

As you are going change age limit 05 years and continue driving with PHVP 10 years.

You can do whatever you like to change but honestly I'm not able to buy a vehicle.

Then I have option to work with my local council's because I have plenty of options work with any Operator on their car without investing a single penny

I start working with you after clearing all your process because your Vehicle policy affordable.

Vehicles Age. Concerned to read about the 10 year old limit from 2026. This will be detrimental to the home to school specialist operators, many of whom operate slightly older vehicles but relatively low mileage, often with quality wheelchair accessibility. Many of the best home to school operators only carry out home to school work and there is already an nationwide shortage. Consideration should be given to exemption arrangements or perhaps a restricted licence with relaxed age criteria but only for home to school transport. Otherwise these specialist companies may be forced out of the industry.

I'm NFDC driver. Under 5 year old car will be very tough for most of the drivers as prices are too high. If condition of vehicle is your concern you can do minimum euro 6 cars as requirement.

Also I think front windscreen sticker and taxi plate is enough. Mostly private hire doesn't have stickers on sides or roof signs. Its ok for hackney plated cars but not good for private hire because private hire customer make advance booking and 99% they know from operators that which car is coming to pick them up with car details and reg. so I think stickers on sides will look uply and most of PH drivers won't like it.

No vehicles older than 5 years.

I strongly disagree with this proposed policy. It will lead to fewer and more expensive taxies in the New Forest.

Being part of the trade in Fareham we have no age limit on WAV taxis ,HC or PHV I'm in but all vehicles are euro 6 complaint and that I believe should be the way forward

Removing a vehicle that is fully functional meets Euro 6 standards and is receiving a good MOT and engineers report is ludicrous and an expense for a taxi driver that sometimes will not be able to make that purchase

There aren't a great deal of taxi companies within the area and the 5 year requirement would impose such a strain on them that I believe that they could be put in a position where, due to the cost of new vehicles, they could go to the wall

Other than being able to crow about " cleaner air", which can be argued against in the overall situation, what would be the advantage of new vehicles to those of any age that are regularly serviced and well looked after.

Although buying a vehicle That's no more than five years old, is in the current climate, more expensive than one up to 8 years old. Then have to pull it off of the license when it becomes 10 years old even if it's in perfect condition is unaffordable for many of us that are barely hanging onto a business since Covid.

The decision to restrict the age of vehicles rather than on the Euro class is supported. This enables a clearer understanding of the Policy requirements and ensures regular improvements to the fleet. The current Euro 6 standard was introduced in 2015 (9 years ago) which would currently align with the policy proposals however with Euro 7 possibly coming into force in 2025 / 26, it is likely a Euro standard fleet requirement could be out of date within 18months. It is noted the Policy does not apply to the current fleet until 2026, when only 10yr old or younger cars will be able to be relicensed. All newly licensed vehicles will have a requirement of being less than 5 years old for petrol and diesel vehicles - this approach is agreed.

The Policy on vehicle restrictions in terms of age or Euro class falls in line with many Local Authorities, including neighbouring and regional authorities. The majority of Local Authorities who adopt this type of Policy do so to align with their commitments to improve local air quality and address climate change.

This Policy is agreed and welcomed.

As with all Licencing authorities and how businesses work. It's easy enough for an operator to register in a different area. When an operator looks to register in an area they take into account many things including age of the vehicle and livery requirements.

Age of vehicles: restricting the use of petrol/diesel vehicles to five years or less from 2026 seems to be an attack on the working class so that a few councillors can 'virtual signal' unless of course the long term plan is to restrict all vehicles over five years from the Nfdc area. I oppose this plan in the strongest way

Sensible age limits - higher age limits for hybrids.

You need to consider the ground reality that's average private hire driver's working with you just because their own Local Council's not Licensing more than 05 years vehicle

Remove the part about taxis needing to be less than five years old.

Consider the unintended consequences of this policy.

understand the wish to have all newer vehicles on the road, but the cost of purchasing vehicles have soared enormously.

In 2019 I purchased new Mercedes E Class for £37,000 today to purchase the same vehicle it costs £62,000. The costs of second hand cars have consequently hit the roof. To purchase a 2020 E Class today would cost £30-37,000. The residual when the car has fulfilled its licensed life then becomes considerably as traders do not like cars that have been licensed so are marked down accordingly. Changing the policy from 8 to 5 years seems to penalise the operator, this could stop prospective new operators and the existing operators as to the viability /profitability of Running a licensed company.

We need to look at the overall picture for electric vehicles. The NFDC promoting electric vehicles for CO2 lower emissions is short termism. Look at the wider picture, when the valuable minerals used for the batteries, the need for polluting power stations providing the electric, the extra cost to purchase the vehicle, the massive lack of charging infrastructure, the disappointing mileage per full charge and the lack of recycling of lithium batteries. Short term CO2 reduction isn't necessarily looking at the bigger picture for the long term, when all the cars are electric, the mineral resources are low, the forest car parks will have to have electric charging points, the fire hazards that all entail and finally the batteries that will be dumped in the forest because the charges to dispose of them will be too high, is this the fitting of New Excest?

Why is there no mention of alternative fuel cars like BIO Deisel. HVO and Hydrogen, where do they stand in you plans, will they have the same benefits as the Hybrids and electric cars?

newly formed NFDC Taxi operator and Driver association There is also a cost factor involved newer cars are in the region of £26,000 upwards now minibuses are currently around the £50,000 mark second hand vehicles are at an all-time high also so the investment operators are putting in does not warrant if there are time scales introduced so that in 10 years, they are expected to replace this is just not good for operators or drivers across the board. Many finance agreements are over 5- 6 years this leaves 4 years to make a profit from the vehicle. It is also our fear that this may increase the number of non-licensed vehicles operating in the area due to operators and drivers not being able to meet the costs and just closing business.

We would like to quote the gov.uk best practice guide for Taxi and private hire licensing as follows. Vehicle age limits 8.28 The frequency of testing required (see 'frequency of vehicle tests' above) 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 and 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 five-year-old used electric vehicle will produce less emissions than a new Euro 6 diesel or petrol fuel 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.

8.29 Licensing authorities should not impose age limits for the licensing of vehicles but should consider more targeted requirements to meet its policy objectives on emissions, safety rating and increasing wheelchair accessible provision where this is low. We also note that this policy change rests on NFDC clean air strategy which is in fact not written yet but in development so there is no evidence for these changes to be implemented. Furthermore, there is insufficient infrastructure available in the New Forest area to support the uptake of electric vehicles and not to our knowledge a grant available to assist with the high prices of purchasing electric cars. Main government have already pushed the electric vehicle date forward as they are aware that the dates are not fit for purpose or achievable. We suggest no age limit for first test or a renewal timescale of 10 years for vehicle. If a vehicle passes yearly mot test and is deemed fit by DVLA and the NFDC vehicle test they are fit to be operated as a taxi or private hire vehicle in the New Forest, there is no necessity to burden us as a trade with these extra unnecessary costs. I do hope that our objections are given serious consideration as we see these as a great threat to our livelihoods and detrimental to our future in the trade. For reference licensing councils local to NFDC policies on age limits as follows. Eastleigh – No Max, East Hampshire- No Max, Gosport- No Max, Winchester- 12 year Max, Bournemouth- No max, Test Valley- 12 year Max, IOW- NO Max.

These objections are a joint objection from the NFDC Taxi driver and Operator association we represent in excess of 100 drivers and operators and hold a substantial amount of NFDC Taxi and Private hire plates. The two points we are objecting to have serious detrimental effects on our operations and our livelihoods and if put in place will naturally put possibly us and other operators out of business the current trade and financial climate does not allow for us to replace vehicles in these time periods it is just not realistic. We do hope our voice and our objections are considered. As this is a genuine concern for us and our businesses.

#### Age restriction for existing fleet

The policy regarding age of vehicles is wholly unsustainable. Drivers cannot afford to upgrade cars every few years. This is especially true for hybrid vehicles. One of the primary reasons this vehicle change is being pushed is because of neighbouring councils putting restrictions on NFDC vehicles. Can the council confirm that NFDC licensed vehicles will be able to freely use Bus gates/lanes in neighbouring council (like Southampton) that has made it difficult for our trade and undermined our services?

Will the council provide grants for the purpose of upgrading vehicles to get in line with these new regulations?

Currently the taxi fleet does not have age restrictions on the vehicles. This can result in an ageing fleet, particularly with the preference for the use of diesel vehicles which are the most polluting vehicle type in terms of tailpipe emissions when comparing different fuel type vehicles of the same age. Recent air quality assessments for the New Forest advises the main source of NOx pollution is from vehicle emissions, and for particulate matter vehicle emissions are the third highest source of pollution.

Improvements in vehicle technologies - cleaner engines, stop / start technologies has shown monitored decreases in NOx pollution across the country and within the New Forest district, including Lyndhurst, which combined with other factors resulted in the revocation of an Air Quality Management Area (AQMA). The AQMA was originally designated due to the exceedances of the nitrogen dioxide air quality objective, with the main source being determined as vehicle emissions. Such improvements in vehicle technologies continue over time and are not restricted to updates to the Euro class specifications. Therefore by gradually reducing the age of the fleet, this will improve local air quality for our communities.

the removal of vehicles from the license after ten years is in itself environmentally unfriendly as the vehicle itself may be more than fit for purpose and you are just scrapping a vehicle for no good reason. continue with twice yearly testing should insure the vehicles make standard of rif needs be introduce the option of the third test more often.

it is also unclear if current vehicles that will become over ten years old after the 1st january 2026 would need to be withdrawn from service? the appendix states no change to the currently fleet! surely this should mean that the ten year maximum should apply to vehicles registered after 1st january 2026.

also with the ever increasing cost of second hand vehicles, and many single car operators being unable to afford changing vehicle more often than needs. this is more than likely to force some of them out of business.

I don't think taxi drivers should have to upgrade their vehicle at enormous cost to themselves.

Your dracion measure not to renew licences for cars over 10 years old from 1.1.26 will be a death knell for some small firms.

I am sure that a cost analysis has been undertaken, but did it factor in the economic effects on the local area.

The effect the change will mean that cars will have to be replaced every 10 years regardless of condition. This presumably unintended consequence will close down firms and cause unemployment.

The rationale behind the change is hypocritical. As long as the car passes the inspections all the criteria are being met regardless of it's age

I do not agree with the age restriction of a taxi being limited to 10 years. So long as the 6mthly tests are carried out and the vehicle passes there should be no need to limit the taxi to an age of 10 years this is not a free n policy

This is a poorly thought out policy if it leads to fewer available taxis in the New Forest.

ULEZ compliant vehicals can date from 2015 meaning older cars can be used without worries of pollution provided they are maintained.

Vehicle age and emissions - from 2026 vehicles can keep going for 10 years, of any engine type - could this be more ambitious e.g. 8 years?

# Implications for WAVs (Wheelchair accessible vehicles)

Introducing age restrictions on vehicles operating in NFDC would have no benefit to the residents of NFDC, especially those residents who require wheelchair access

It's very important that the dft consultation is applied and used. There is no age limit imposed on cars. The new forest is a large rural area with a very small ammount of public electric chargers how much infrastructure including charging points will be made available at taxi ranks?

By imposing age limits on the vehicles of 10 years is handy however the current air quality regulations may not change and plenty of good vehicles that would still meet current legislation would ne removed from

The fleet. . WAVs are extremely expensive . New forest has an exceptionally large amount of "voluntary wheel chairs accessible hackneys, and phy "owing to the lack of age limits These vehicles would need to be replaced, it's highly unlikely they will be replaced with equivalent vehicles . Lots of operators do school transport and the recquirement to replace cars at 10 years would mean an increase of costs to Hampshire council .

If I understand this correctly in order for me to continue operating a NFDC hackney registered vehicle, I would not only have to replace my current vehicle but replace it with a DISABLED ACCESS vehicle less than 5 years old??

This would cost in excess of £40.000!! Does anyone at NFDC licencing have any idea of the impact this will have on the taxi fleet in the new forest??

I would estimate that you would loose 70 - 80% of operating taxi's I would not consider continuing and have spoken to many other drivers who feel the same.

Do you think I make anywhere near enough to even consider buying a new vehicle? Cost of fuel, dead mileage, insurance costs increased by 50% this year, lowest fare rate in the country and the lack of support provided by NFDC licencing?????????????

I am writing regarding proposed changes to taxi licencing laws at NFDC, a draft policy is out at the moment detailing worrying changes to the existing regulations required to operate a hackney or private hire vehicle in NFDC.

At present a tax operator can have a suitable vehicle which in addition to a regular MOT test has a NFDC inspection, if the vehicle is over 3 years old then two annual inspections are required (three annual inspections) no age restriction is currently in place.

As licencing laws stand at present and in order to own and operate a hackney taxi at NFDC it must be wheelchair accessible, (unless on a historic plate), therefore if the proposed changes take effect then I would have to acquire a disabled adapted vehicle, less than 5 years

I currently operate a London taxi, built to be a taxi and wheelchair accessible, it is maintained to the highest order and is visually pleasing to many in the New Forest.

To follow these new guidelines as set out by NFDC I would have to invest £40k at least for a suitable replacement vehicle. Many other small operators are exactly the same, ironically the small operators are the only ones currently operating wheelchair access vehicles, many of the larger firms don't have a suitable vehicle on their fleet.

I have only been in business for a few years and there is no way I could justify outlaying that kind of money to keep up with proposed changes, it will wipe out 75% of the taxis currently operating in Ringwood, especially with the ever increasing cost of fuel.

I think that NFDC are mimicking neighbouring BCP council who have already implemented a similar change, this is grossly unfair as at NFDC we have, by geographical nature, massive dead milage as well as the lowest fair structure in the country and totally unsuited to operating a fully electric vehicle as implemented in the proposed change.

The Hampshire County Council School Transport Service has concerns regarding a lack of dispensation to the age of wheelchair accessible vehicles under the proposed changes to the Taxi Policy. Increasing the restrictions on age for wheelchair accessible vehicles, as is proposed under these changes, is therefore likely to increase the cost to school transport and in the medium term also reduce availability. We would therefore like to request that a dispensation is considered for wheelchair accessible vehicles, in line with other licensing authorities. Useful examples can be found in the policies of Eastleigh Borough Council, Southampton City Council, East Hampshire District Council and Fareham Borough Council.

My company is New Forest Travel. I am really concerned by this change as we have 5 Minibus's licenced by NFDC and are currently in contract with Hampshire County Council for School transport for 4 years. We carry children in Wheelchairs. This new change would take out my entire fleet and also make 3 drivers redundant. This is a worry. To replace all vehicles we are looking at over £300,000. Our mileage is relatively low compared to normal taxis as they are only used for school contracts. Is there a way that Minibus's could be exempt from this

WAVs are extremely expensive. New forest has an exceptionally large amount of "voluntary wheel chairs accessible hackneys, and phy "owing to the lack of age limits These vehicles would need to be replaced, it's highly unlikely they will be replaced with equivalent yehicles. Lots of operators do school transport and the recquirement to replace cars at 10 years would mean an increase of costs to Hampshire council.

#### Interim vehicle testing

believe Hybrid Vehicles should be tested twice a year only if they are 7 or more years old. (Not 5 years as described in vehicle licensing section)

I further write to disagree about another proposed change in the vehicle regulations, this time not about costings.

It seems discriminatory against diesel and petrol vehicles over hybrid and electric in age and testing, of which it seems critical detail has been overlooked!

In what world are electric cars any less problematic than diesel or petrol? Electric or hybrid's are much more expensive to buy, much heavier in weight meaning more tyre wear, hybrid's less efficient on motorways, potentially harder on suspension and ball joints and other mechanical parts. Becoming more expensive to insure, difficult to be recovered on break downs.

Harder wearing on brakes due to excessive weight.

They will also corrode in the same way as diesel or petrol vehicles as well.

Also I suggest a potential risk in your workplace.

Another oversight by yourselves and indeed Government is 75% of the population do not have off road parking for charging if forced the EV route.

Oppose test every 6 months vechile over 5 years not cost effective.

Opposethis thatt petrol diesel cars 5 years old this is, financially unviable.

Cost of new vehicles start £26,000 last at least 6 to 5 years so would take at least 4 years be in any profit.

We oppose this point for many reasons. Firstly, New Forest District Council already struggle with the current pressures where vehicles over 8 years old are tested twice a year. I phoned up on the 27th February for a vehicle test date and the next available test was the 13th March. This will only get worse if vehicles over 5 years old are being tested twice a year. We believe the current 8 year provision is sufficient enough to maintain a high level of vehicle standards.

We can only speak for ourselves, but our vehicles are inspected multiple times during the year as it is already. For our vehicles under 8 years old they are tested by VOSA once a year, they are then inspected by yourselves (NFDC) once a year, we then service all vehicles every year or at 10,000 miles (whichever is first) and during the service they are inspected again. All of our vehicles inevitably require general maintenance during the year so every time they are bought in for work they are inspected again. These inspections are not just mechanical but we like to think they are similar to the NFDC test so as well as the mechanical side, the condition of the inside of the vehicle is inspected to make sure it is a fit and proper state for carrying passengers, we do this to catch potential issues early and if they need rectifying we do that immediately. Obviously for our vehicles over 8 years old they are subject to another test from yourselves.

To reduce this to 5 years seems ludicrous and from the outside looking in it could be seen as a money making scheme for the council, especially in light of the proposed increase in test fees.

Twice yearly testing of vehicles - this is better than the current 8 years but our understanding is that neighbouring authorities say 3 years. Could this be more ambitious?

Due to the extra checks on the 5 year and above vehicles the appointments will take so much longer to arrange. I am sure the proportion of vehicle this age in the forest having to have an extra test will have and impact on administration and vehicle test time, will there be extra staff and space at testing centres to accommodate the surge?

Life of a Taxi. 5 years for petrol and diesels, 7 years for hybrids. No restrictions for E.V's. (Surely E.V.'s wear at same rate as other vehicles.) This depends on make, quality and maintenance of the vehicles. With New Forest having its own testing centre, many older vehicles are in good condition, surely they are able to advise if vehicle is fit for purpose. Double testing for vehicles over 8 years.

Dear NFDC Licensing I write to you as chairman of and on behalf of the newly formed NFDC Taxi operator and Driver association with regards to the Key changes to New Forest taxi policy 2024. We have read through the alterations proposed and, in most parts, agree that they are for the good of the trade and support them. We do object to two points as follows and would like them to be seriously re considered they are as follows.

Vehicles that are 5 years or older from the date of first registration must undertake an additional test six months after the license grant date. We appose this proposal on the grounds that we as operators struggle to get tests when we require them with often two or three-week lead time. Reducing this date would make there a necessity for more vehicle testing thus further problems obtaining testing. Also, modern cars are much better built than in the past with some manufacturers even giving a 10-year warranty although taxis do higher millage than average cars the product is much more reliable, and we feel the current 8-year timescale for 6 monthly testing is sufficient at present and should be kept in place. There is furthermore an impact on cost with some manufacturers even giving a 10-year warranty although taxis do higher millage than average cars the product is much more reliable, and we feel the current 8-year timescale for 6 monthly testing is sufficient at present and should be kept in place. There is furthermore an impact on cost with some manufacturers even giving a 10-year warranty although taxis do higher millage than average cars the product is much contributed by the product is much be less than five years from the date of first registration, at the time of initial licensing. All Hybrid vehicles must be less than seven years from the date of first registration, at the time of initial licensing. No change for current fleet, but after 1 January 2026 only those vehicles less than ten years old will be renewed. The age policy does not apply to fully electric cars. We oppose this policy change that all petrol or diesel vehicles must be less than five years from the date of first registration at the time of initial licence and the policy to introduce a 10 year life span for Taxis on the grounds that all petrol or diesel vehicles have such stringent emission levels and on mot tests it currently states emissions not recorded on a (2016 1.6 Seat Toledo TDI car) as an example, they are free to travel in Lond

The legal requirement is that private hire vehicles which are at least three years old, and all taxis, must be subject to an MOT test or its equivalent at least once a year. Local authorities may obtain a designation from the Secretary of State for Transport to issue 'Certificates of Compliance'. The requirements of the test normally include those in an MOT test but may also include another inspection by a licensing officer to ensure the vehicle meets the relevant local requirements for issuing a taxi or private hire vehicle licence e.g. cleanliness of the vehicle inside and outside, correct plates displayed etc.

An annual test for licensed vehicles of whatever age (including vehicles that are less than three years old) seems appropriate in most cases, unless local conditions suggest that more frequent tests are necessary. More frequent tests may be appropriate for older vehicles which may be more prone to mechanical defects (see Vehicle age limits or for vehicles owned by proprietors that persistently present vehicles that do not meet the standards required by the authority

## Private Hire door signage

have executive car i spend 30,000 on it we have nfdc taxi vehicle plate as a identitey so why we need sticker on the door.it doesn't look nice on car in london they are reducing the the plate and sticker and our areas putting more stickers on car.

I am NFDC driver. I am not happy with vehicle signage and windows tinted.

We work with executive. Our cars are expensive. We won't like to put signage or remove tinted windows

No where in England private hire vehicles has these restrictions. If this will go ahead a lot of drivers will go to other councils

Door stickers.i am against the door stickers.

Being a NEWFOREST DRIVER FOR over 5 years I never had any issue with customer about door stickers. The inside badge and back plate is more than enough. I do not agree with door sticker and would like to request not to implement this policy.

Door sticker removal

The dft consultation made no mention of a Licencing authorities name on the door of a vehicle (this is something that Southampton Licencing have wanted for a long time. All the drivers and companies know that you're bowing to their wishes) door stickers indicate the car is available to be hired. And That invites the public to approach the vehicle and find out the booking details and could lead to uninsured bookings occurring. Without door signage only the person ordering the vehicle will be aware of its status and no attempt would be made any member of the public to enquire how to order it. Hackney carriages should be identifiable as being able to be hired immediately. The lights indicate his. The stition is one indicate it can be hired, by diving a registration number to the passenger. No other identification needs to be on the vehicle. The registration is enough. Any extra identification iust indicates it is "possible to hire this vehicle" and invites the public to ask how.

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I believe in all councils signage is to promote or to proof the licensed operator of the that council. If I am working for Uber and I work in zone system where I can work in any city, Then I do not think I should have sign on the car. If I work in New Forest area with a Local operator then yes I should have signage with operator name and phone number to make bookings. But If I am on app based operator then I should be exempt from the signage. I HOPE COUNCIL WILL ALLOW EXEMPTION FOR APP BASE PHV DRIVERS.

I Have Mercedes E Class 68 plate this is executive cars.sorry we don't want any stickers on our cars.

But please don't make it compulsory to put signage and remove windows tinted

As a Private Hire Driver with New Forest District Council I don't agree to put additional signage to be placed on the rear doors of the vehicle. I request the council not to implement this rule for Private Hire Vehicles. Only external plate and internal plate issued by the council is enough. Please consider my request.

Door sticker: New Forest District Council, which licenses taxis in the area, understands the value of its taxi drivers. Many drivers work part-time to supplement their income, and come from diverse backgrounds. Currently, New Forest permits drivers to work with multiple operators without requiring door stickers. Implementing mandatory door stickers could create difficulties for these drivers, as it might limit their flexibility. Therefore, I strongly recommend against implementing mandatory door stickers for private hire vehicles in the New Forest district council.

Vehicles are hard to identify as they don't have door stickers and only plate on the back.also in Southampton ph Vehicles are not allowed to be white colour so it's also confusing when white car comes outside house and have no door stickers.maybe have same rule as Southampton like no white cars as ph and have door stickers

As a Private Hire Vehicle Driver with NFDC, I don't agree to put additional signage to be placed on the rear doors of the vehicles. It is to be requested that please don't implement this rule on Private Hire vehicles. Only external and internal plates issued by council is enough.

There are some companies as well who had clients they prefer signage free vehicles. It might effect there business as well

Hope for the positive response

Ultimately, it's a cost for private hire drivers who want to change their vehicle or the firm they work for, as the stickers can damage paintwork when removed.

No need of signage

As a Private Hire Vehicle Driver with NFDC, I don't agree to put additional signage to be placed on the rear doors of the vehicles. It is to be requested that please don't implement this rule on Private Hire vehicles. Only external and internal plates issued by council is enough.

There are some companies as well who had clients they prefer signage free vehicles. It might effect there business as well.

As experienced driver, i believe that permanent stickers should be avoided for the following reasons:

\*\*Safety Concerns\*\*: When it comes to private hire vehicles, the safety and well-being of our customers must always remain our top priority. With the majority of the public unaware of the distinction between private hire and hackney taxis, there is a risk that passengers will hail any vehicle displaying these stickers, potentially leading to drivers taking advantage of the situation. Simply relying on stickers on doors will cause customers to overlook essential details like the driver's photo and registration number, potentially putting their safety at risk. When a customer books a private hire vehicle, they receive the driver's name, registration number, vehicle color, body type, and the driver's private hire number for identification. Therefore, the permanent door stickers are deemed useless and unnecessary. As an experienced private hire driver, I believe that stickers on the doors do more harm than good.

\*\*Confusion with Taxis\*\*: It's important to distinguish between private hire vehicles and public taxis clearly. Requiring private hire cars to have permanent stickers similar to taxis will create confusion among the public. This confusion will lead individuals to mistake any vehicle with council stickers for a taxi, inadvertently compromising their safety. Maintaining this distinction is essential to ensure a clear and safe transportation environment.

\*\*Driver Experience\*\*: Introducing permanent stickers on the doors of private hire vehicles will pose significant challenges for drivers. Just imagine situations where customers mistakenly enter the wrong vehicle, causing inconvenience and potential safety risks. This will create major difficulties for drivers, especially for the majority of New Forest drivers who work for Uber. Given Uber's popularity for night out, many rides are requested from popular nightlife spots in busy areas. These Serious safety concern that must be considered.

\*\*Tinancial Impact\*\* The implementation of permanent stickers on private hire vehicles by the New Forest Council inght not directly benefit the drivers financially, but it could inadvertently impact the Council itself. This is because some drivers may choose to prioritize obtaining the Southampton private hire badge over the New Forest sticker. Many drivers in New Forest also hold the Southampton badge, and they will lean towards using it more if the option of utilizing bus lanes in Southampton becomes more attractive to them. This shift in preference will lead to a potential decrease in revenue for the New Forest Council as drivers opt to operate under the Southampton badge to enjoy the additional benefits it offers. On the other hand, Southampton City Council might experience a financial advantage from this situation, seeing an increase in revenue from licensing fees and more drivers choosing to operate under their authority due to the appeal of using bus lanes. It's important for the New Forest Council to consider this financial impact when assessing the implications of the permanent sticker law on private hire vehicles.

As an Operator and Driver in the NFDC authority, I object to this new policy change. Door cards were a requirement in the past for NFDC registerd PHV's. They were used then removed. The stated reason for re-introduction of the door cards is safeguarding. I have read your policy changes. I have also read the UK.Gov guidelines on door cards, from the taxi and PHV guidelines, as well. There is NO conclusive evidence that door cards makes the public any safer.

Furthermore, The evidence used in the government policy guidelines uses midlands cities such as Birmingham for data analysis. I sumbit that Southampton, the New Forest and othere local authorities are nothing like Birmingham. Further study on crimes in our areas related to taxis or PHV's has shown conclusively that no victim was able to remember the type, registration, or council where the perpetrator's car was registerd. I have spoken to several victims directly and councillors of SCC about door cards. They agree that they were unable to remember anything about the vehicle used in their crime case. This is despite having door cards fixed to the vehicle used to perpetrate the crime.

My business is PHV only. I have an affulent clientele, including executives of PWC, Directors of Soverign wealth funds, and other prominent figures. They appreciate the minimal licensing on the car. None of my work is with Uber, or any other operator in the region. All my work is prebooked by phone, text, or email. In all cases my PHV is described to the client during the booking process. Or, the customer is a regular user of my services and knows the car.

I would ask that you reconsider the efficacy of this policy as well as the added burden for drivers and NFDC staff. If you must institute this policy, I request that you expand on the defined exemptions allowed to this new ploicy to include owners/operators who exclusivly use prebooking; or are not using any app based hiring platform such as Uber, Lyft, etc...

The Council supplied License plate holder is of poor design. There are 3 bolts which hold the 2 halves of the assembly together. 1 half is bolted to the car. The other half holds the license plate bracket. The 3 bolts holding the 2 halves together are easy to remove. The plate can then be removed from the vehicle. This process takes only a minute or two. I have spoken with NFDC registered PHV drivers who regularly remove them when not driving the car as a taxi. The exemption I received for using Velcro stickies was given as they are much harder to remove and replace. Once removed you need a new set of velcro stickies to fix the plate to another car.

I agree with this policy. However, there should be an exception for classic/vintage cars used for weddings and other special events.

I have my internal badge on the dash board. It stays there all the time. I can easily retreive it for showing a passanger. If it were fixed to the windshield in the lower left and it is raining then it is not visible. Also it is not accessable to me for showing to a customer once they are in the car.

prefer not to have stickers on my vehicle as a private hire driver. They can be distracting and may affect the aesthetics of my car.

the door signage could indicate that a vehicle is available for hire and could therefore lead to uninsured bookings.

It may cause confusion with the public between private hire vehicles and taxis,

It may encourage customers to hail a private hire vehicle in the street

Customers make an advance booking and know the details of the operator, vehicle type and registration number, which is collecting them.

app based operators who work outside of the area should be exempt from the signage requirement,

the door stickers can damage the vehicle paintwork when removed for sale of a vehicle, licence plates at the rear are sufficient,

clients may prefer signage free vehicles.

The new rule on stickers is completely unnecessary. The myth that car stickers make it safer is clearly outdated and this shouldn't be pushed for by the council. One of the main reason why I personally chose to license with NFDC is the fact that stickers are not required. Cars are identified by the number plate firstly and secondly by the taxi plate that we are required to fix to our cars, as well as the sticker on the front window. In my short 1.5 years working in this trade I've never had any issue with this. In fact, it can be argued that having stickers makes it unsafe, as people become indifferent. Does the council know that in London vehicles neither have a plate or stickers? Why would it be that we require it in the New Forest. This will also hit our pockets as some jobs and events will not give jobs to vehicles with stickers (because it looks tacky).

Other authorities have consulted on door stickers and these are not popular with drivers or passengers. DFT guidance clearly states that stickers should say pre booked only. Having to display company name and contact details makes it obvious to public that vehicle is available for booking rather than just pre booked through an operator.

Do not implement door signage

Drivers are not happy with new signage policy. Drivers are thinking about changing council and we are worried that we will struggle again with taxis.

Vehicles should have door stickers so it's easy to identify as at the moment only have plate on back.

It seems as though This council like many others is keen to put so much signage on PHVs that the mind of the consumer is inured to it all. Perhaps we should look at better training for the drivers instead.

NO STICKERS!

NO STICKERS!

Please don't make signage compulsory for the drivers and make it easy for them to get operator license.

We like to work in NFDC but please don't implement signage and windows tinted and make it easier for outside NFDC resident to get operator license.

I request the council not to implement the requirement to put signage on rear doors of Private Hire Vehicles.

We don't want to see door sticker signage

I request the council not to implement the requirement to put signage on rear doors of Private Hire Vehicles.

We don't want to see additional door sticker . We would like stay in newforest traditional way.

I don't want permanent door sticker in my car.

NO STICKERS!

NO STICKERS!

NO STICKERS!

We feel it is important for members of the public and other road users to know certain vehicles are licensed and who they are licensed by and that this is visible from all angles

I am an NFDC registered private hire driver in my 8th year. I have completed over 22,000 trips as a contractor with Uber. Uber recognise me as one of the highest customer rated professional drivers. Uber have provided me with acknowledgement and recognition that I am one of very few most complimented Drivers within the UK. My rating based on updated previous 500 rated trips is 4.99 out of a maximum of 5.

l object to vehicle door stickers being a requirement on my own personal Private hire taxi. I see it as a step backwards because customers can recognise my car is a taxi by my car Number plate.

These stickers can damage the paintwork and also can be a nuisance as I usually work at night and the door signage can draw unwanted attention of sometimes intoxicated people (who haven't booked), trying to enter my car because they see I am a taxi. I am insured in my car when not working, and

They can sometimes be aggressive and damage my car because I refuse to transport them because they have not made a bona fide booking. I personally don't want to draw unwanted attention of people being aggressive because I won't take them as they have not made an official booking. They can sometimes slam the door or hit the car, and this is damage I will have to pay for.

My car is owned outright by myself and bears the in car NFDC taxi licence details within the front windscreen, my rear taxi plate and also my taxi badge that I wear whilst working. The pre-booked Uber customers have my car Number plate and a huge amount of information about myself, including my up to date photo before entering my car.

I am registered with Uber for flexible bookings via app, and I also have regular pre-booked School runs for Hampshire County Council through an authorised taxi Operator registered with NFDC

I believe the door signage should be for all metered cars and cars owned by a company with hackney cars. The one-man band who has only his regular airports and hospital transfers, the clients would probably prefer not to have the signage and to promote the fact their home is unattended. The signage on the cars would make the forest an uglier place to drive in.

The signage would put off new PH owner drivers as its their only car in the household, we need to encourage more independent owner drivers.

Not sure in 4th paragraph the sentence regarding depreciating high milage cars.

I am writing to formally object to the proposals in the draft licencing document

The taxi trade is a wide and varied trade, where (no one size fits all) The members of the trade look round and register where the regulations suit them. The vast majority of the feedback I have had is (we registered in NFDC because they don't have door stickers) A few drivers even suggested £500 licence fees for stickerless cars.

I would suggest that the Council adopts all the recommendations in the DFT guidelines regarding signage and vehicle ages

During this report, you will see a reference to the DFT recent release of the best practice guideline

Taxi and private hire vehicle licensing best practice guidance for licensing authorities in England - GOV.UK (www.gov.uk)

I fully understand that it's a long and drawn out document, but since its release, I have asked every person involved in taxis if they have read it. Only two have replied yes. I feel it is therefore important that this read

As experienced driver, i believe that permanent stickers should be avoided for the following reasons:

Members of the public can often confuse private hire vehicles with taxis, failing to realise that they are not available for immediate hire and that a private hire vehicle driver can only fulfil pre-booked requests. Greater differentiation in signage will help the public to distinguish between the two elements of the trade. To achieve this, licensing authorities should seek to differentiate the profile of private hire vehicles as these can only be legally engaged through a booking with a licensed operator.

This increases the success of those illegally standing or plying for hire and may lead to confrontation when private hire vehicle drivers refuse a request for a journey that has not been pre-booked. Having an illuminated sign on taxis and prohibiting them from private hire vehicles will provide a simple way for the public to differentiate between the two services and we encourage all licensing authorities to promote this difference to raise public awareness.

Licensing authorities' private hire vehicle signage requirements should be limited to the authority licence plate or disc and a "pre-booked only" door sign.

This approach enables passengers to be given the clear and consistent message that you should only get in a vehicle that 'has a taxi sign on the roof' unless you have pre-booked a private hire vehicle and have received information from the operator to identify it.

Where an exclusive relationship exists between the vehicle proprietor, driver and operator, a licensing authority should consider permitting the display of operator details in a discreet manner to not undermine the overall objective of enabling the public to differentiate easily between taxis and private hire vehicles. This might, for example, be through small branding on the rear of the vehicle.

The signs on the door are also a generic sign any person who orders a car could think it's their car and could also get annoyed.

## **General Comments**

Changes from 2026

Air Quality

This is controversial, more about very poor traffic lights, road works, state of the roads, pollution from cruise and container ships in the Solent and Southampton having the most amount of traffic lights per mile than any other city in Britain. Stuck at traffic lights.

clarification regarding the boot or luggage compartment must be separated from the passenger compartment by a suitable barrier? surely the seats are barrier enough as this is the case in most cars/suv/mpv

"To meet the requirements of the Licensing Authority, the business address provided on the application form (which will subsequently form the licence address) must have recognised office facilities, a regular postal service and be widely acknowledged as a site that provides office space. The site must also be suitable for compliance inspections and meetings with officers."

This policy will not be good for owner operators who may have their business running from home. With new technology and booking systems, it may be better to run operations from home. For this reasons making home business operations obsolete with this policy is not a good thing for small time operator who may not need office space per say.

Cost of this box ticking exercise? I would like to know how much this will cost and who will undertake this consultation. Or to make work for idle hands?

Drivers and passengers are at risk in the dark and unlit areas

This will have the effect of the driver, passengers thinking its safe to get out the car in some areas of the forest, and could put them at risk of further injury on the unpayed roads

Visitors to the new forest are not aware of the dangers of Badgers, Ponies, Bulls, Deer or pigs that can be easily frightened if you creep up on them during the day let alone at night

Visitors could also be easily frightened by the forest noises and run off, they could easily fall in a roadside ditch or mud and be difficult to find.

Any person who has walked in the forest will realise its easy to lose your bearing . get lost , fall down and be hard to find. The safest option is to stay with the car

Really pleased to read about the enhanced DBS procedures and requirement to participate in the update scheme and 6 monthly checks.

Increased checks on driver

This all looks as an operational increase in Council staff duties. Why is this all really necessary? Obviously these extra cost will need to be past on by operators and drivers, with the price of cars and mini-buses more than doubling in price over the last 6 years, the New Forest will have to have a large increase in Tariffs and Rates.

There should be some consideration of the possibility of driverless taxi / hire vehicles.

Over the intended lifetime of this policy driverless vehicles are almost certain to be in wider use. Driverless taxi / hire vehicles should bring important cost savings and convenience to users, particularly in less densely populated areas, and contingency plans should be in place for oversight (and possibly regulation) of organisations deploying them.

Removal of Fire extinguisher.

Thank you! I have been saying for years that this policy puts drivers at risk.

I am a NFDC private hire driver. And I am worried about the draft for the new taxi policy.

It is easier to get taxi in NFDC, much better then before.

Cant say I had any problems with drivers

Been all good so far

I think the proposed changes would destroy the already fragile network of NFDC private hire and hackney transport

Already you have everything up to date.

This is good and part of a national programme

Hi! I find the measures you wanna implement extremely harmful for the trade and most of them are unacceptable. Seems like NFDC really want go go backwards with this one. I will not renew both of my licenses, driver and car with your money lover, extremist city council.
This is all just a cash grab. You are after our money but guess what? You will most definitely lose alot. Name one measure you guys took having drivers/car owners in mind and to help them. Ill wait. Also ,cut the bullshit about climate change agenda. We all know its a hoax.
People starting to wake up. You will not gonna get away with this. Been licensed with you for over 4 years but no more.

Private hire operator should be easily accessible for NFDC drivers as NFDC have given Uber operator licence even Uber doesn't have any office in NFDC but NFDC driver who live outside NFDC cannot get operator licence.

So many drivers are speaking about opening their own companies but some don't live in NFDC. And they can't apply for operator license. Can it be possible for the outside NFDC drivers to get operator license.

I live outside NFDC and would love to start my own taxi company but I can't as I can't get operator license.

still don't agree with cross border hiring vehicle livence in nfdc should only be working in new forest and soon vehicle only southampton.

The draft policies will make NFDC drivers out of job and they will have to rely on public benifits as new cars are very expensive.

As you change lot of drivers leave

Ridiculous why are you so determined to put people out of business

I have set out Bolt's response to the relevant proposals as a licensed private hire operator in New Forest in response to this consultation on your updated licensing policy. In support of our response, Bolt held a driver forum with New Forest Drivers on 1st March 2024. We appreciate some changes that have already been made to the proposed conditions, such as providing further clarity on reporting requirements for drivers when they partner with multiple operators. At our driver forum, 100% of drivers mentioned the importance of flexibility in maintaining their livelihoods so we are glad to see this change in the draft conditions.

We would appreciate further clarity on the three specific conditions referenced

Any sensible driver registered in the new forest will realise that they mights as well pay the £600 get a camera and register in Southampton.

That way they will have access to the bus lanes. And an extra 2 years on their licence

With the introduction of door stickers and an age restriction

That will be my personal choice. Couple this with the 6 months wait to get a driver authorised to drive a new forest car. It certainly makes sense

# Probably going to register in Southampton

This year taxi insurance has gone over the roof and drivers are struggling.

I believe if NFDC will go with draft policies, so many NFDC drivers will either leave NFDC or will be depend on public benifits.

Llive in Calshot, and first time to apply for taxi licence

White vehicles should not ne allowed as private hire vehicle as its very confusing for passengers in southampton.cctv and door stickers

The cost of living crisis is the wrong time to be increasingly any payments from new forest taxi firms and drivers

I am continuing to fight this proposed change, I think NFDC licencing are making a massive mistake!

Welcome to the online world :)

I moved to the New Forest a couple of years ago to be near my daughter. I have found it very difficult at times to hire a taxi. Going forward if there are less taxis available here I would have to move again away from my family to a less isolated area.

## Should be ashamed of yourselves stressing drivers out like this.

it is a shame that over recent years, more interest in assuring hackney carriage are complying with currently legislation by sending out compliance officers and following up of customers complaints about over charging.

Peoples habits have changed drastically since Covid and may never go back to the way it was before. It is hard enough to make a living in the current climate without imposing extra restrictions with regards to vehicles.

## Please make it easy for us not hard. Thank you

I was disappointed to find that I had to read the national newspapers to discover that NFDC had been conducting a review of the Taxi Licensing Policy which could have an adverse impact on the scale and scope of the taxi service within the New Forest.

I have now read the review document and have a number of concerns

1.Why are these things done in such a stealthy way? As someone who was born in the area, I have always tried to disagree with the widely held belief that NFDC is remote and detached from the people that it is supposed to serve but it will be hard to continue believing that unless the Council introduces a far more open, inclusive and better advertised approach when considering changes to their existing policies. I believe that Taxpayers shouldn't have to constantly monitor the NFDC website to enable them to engage with their Council and that there should be some form of distribution mechanism that allows interested parties to receive notifications of all such reviews and thereby facilitate a greater involvement in Policy making than is currently the case.

2. Given that the New Forest has always had a woefully inadequate level of public transport provision, anything that could impinge on the availability and scope of the Taxi Service in the area should be avoided.

3.The review states that "the new fleet standards will reduce the impact of emissions from our (licenced) vehicles on the air quality in both the New Forest and other areas where our licensed vehicles work". I would challenge this assertion and would like to seek the data that supports such a claim - even if this were true (which I doubt) then any such impact would be absolutely negligible.

Non-UK passport holders - requiring a good character/ conduct certificate, that is not limited by time passed or by the amount of time spent living in another country since the age of 10, appears a significant barrier for those who wish to enter in to the taxi trade, as these certificates can not be obtained from many countries. This element of the policy could be considered discriminatory based on race, especially for those who are not legally permitted to hold UK citizenship, no matter how long they have resided in the UK (e.g. China, Austria, Japan - to name just a few that do not permit dual nationality to be held). Therefore, a 55 year old with permanent residence in the UK potentially held for their entire adult life, would still need to obtain a certificate based on their childhood?

When compared with the requirements for a UK citizens; who only have to account for periods abroad for periods in the last 5 years, over 6 months in duration, it appears that the perception that non UK citizens pose a greater threat to the public than UK citizens, is being built into policy, when this is not a reality.

High viz to be worn when attending the garage - good to be in the policy

any exemption for station ranks that are private property? if not you may have a series of petty complaints from drivers about idling engines in the middle of winter when temperatures drop to freezing conditions. people expect taxis to provide a service but if they are not allowed to continual heat the cars why would they wish to stay out working in the evening and risk becoming ill through the cold conditions

#### Idling engines

This area of the policy is welcomed and agreed. Unnecessary idling engines increases localised air pollution impacting the local community including the drivers. It is agreed that compliance officers should routinely advise and request taxi drivers with idling engines to turn them off or move on. It would also be welcomed for taxi firms to request this positive behaviour from their drivers. Obviously suitable provisions should be provided in colder weather to ensure drivers do not get cold, and in extreme cold weather a common sense approach should be adopted by compliance officers.

Legislation and law Outdated. (please explain). I would have thought after operating a Licensing department for more than 100+ years I would have thought the New Forest Council authority should be aware if it is suitable for purpose.

The Licensee shall immediately after the termination of any hiring of a licensed vehicle, or as soon as practicable thereafter, carefully search the vehicle for any property which may have been accidentally left there; and Any property accidentally left in a licensed vehicle must. (within 48 hours) be handed in to the private hire operator if the journey is booked through an operator, or handed in a Police Station.

As mentioned in our recent Site Visit in February 2024, Bolt has a clear lost property process in place. If the driver and passenger are unable to resolve the issue within 24 hours, we escalate this to our local operations team to investigate further and arrange for a courier to pick up the item from the driver and deliver it to a local hub where a passenger can pick it up. We are happy to explain our Lost Property process in detail in a future meeting. We recommend that this requirement is caveated for operators such as Bolt who have their own processes in place and are applyabled.

No smoking signs. No one smokes in my car. Ever. This is the law. anyone entering the car who wishes to smoke is told that his is not allowed by law. I do not want to have to put stickers all over my car to show customers what is clearly part of the law already. My vehicle is not operating with Uber or any other app based service. All my customers are aware of me and my car. My customers, with rare exception, do not smoke at all. I make arrangements with those customers who do smoke to stop at appropriate points to allow them to exit the vehicle to smoke.

Licence holders must notify licencing services

Discriminatory, If the rules are being followed according to DVLA, there is no need to ask for extra proof.

This is ambiguous, "the office to be a recognised office facility"

When a small operator only needs a phone and a laptop or iPad, why would they need an office? Booking systems, online diaries and accounting packages are all online, no need for office facilities. To pay for a commercial office would not be financially viable and a total waste of money. The taxi companies, yes, I understand as the cabs and passengers would visit often so the need for a commercial premise is warranted. I even have reservations for the independent Hackney's that just use the ranks, why would they need an office? However, your independent Private hire owner operator why would there be the need? They do not have passengers visiting their home address, they probably only go out a couple of times a day. This would not be viable spending s

I have worked as an operator in the New Forest for over 19 years and I have seen a decline the recent years of the independent drivers. Please encourage them. I struggle to get drivers as your process is so long. It used to take 4- 6 weeks for a new driver application. Please reverse this situation and let's make it easier for the new local drivers. Let's encourage them, let's make them welcome please!!!

Drivers must cooperate fully with requests from police officers, authorised officers and authorised officers from other licencing areas

Only the police have the right to stop a moving vehicle. Any other person trying to stop a licenced vehicle, can be seen as attempting to "flag down" Any person trying to gain the attention of a licenced vehicle is clearly trying to "immediately hire a pre booked only car"
Licencing officials and the Police must comply with PACE section 34 "you do not have to say anything, but it may harm your defence if you do not mention when questioned, something which yoy later rely on in court" It would be a miscarriage of justice if an accused person who followed their rights was later prosecuted under a byelaw for "non cooperation"

external safeguarding training provided by the Blue Lamp Trust.

Hampshire County Council is redeveloping its MiDAS Accessible training course at the moment, with a view to incorporating Safeguarding training along side other material that would be beneficial and seek to raise the standards in the PH and HC trade in relation to customer service, disability etc.

Once developed, NFDC may wish to consider whether this combined course would offer a wider overall benefit. Therefore, removal of the reference to a specific external provider (Blue Lamp Trust) may provide scope for NFDC to select a different provider of safeguarding training, if appropriate, in the future.

Legislation was added to the police and crime act 2017 section 177 and is quoted as below

Licensing functions under taxi and PHV legislation; protection of children and vulnerable adults

(1)The Secretary of State may issue guidance to public authorities as to how their licensing functions under taxi and private hire vehicle legislation may be exercised so as to protect children, and vulnerable individuals who are 18 or over, from harm. Safety and best practice

I would have thought the Council do this automatically and is capable of operating the system. Driving test for all new would-be Taxi drivers would be an idea as for all taxi drivers over 70's. This is undertaken by the Council examiner and could check if an understanding of the English language.

Drivers should not stop or wait near a taxi rank

The dft guidleines state

Members of the public can often confuse private hire vehicles with taxis, failing to realise that they are not available for immediate hire and that a private hire vehicle driver can only fulfil pre-booked requests. Greater differentiation in signage will help the public to distinguish between the two elements of the trade. To achieve this, licensing authorities should seek to differentiate the profile of private hire vehicles as these can only be legally engaged through a booking with a licensed operator.

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.

Licensing authorities' private hire vehicle signage requirements should be limited to the authority licence plate or disc and a "pre-booked only" door sign.

If a vehicle is made to look like it can be hired the public will try and hire it. The best practice is to make it look inconspicuous as possible as per the guidelines,

But most importantly how near to the taxi rank, My car has no stickers on it, this can be parked 5 metres from a rank and no one would notice it was a PHV, unless they got close.

A vehicle that has livery on can be clearly seen from 100 metres from a rank ???

Where are the protections for the drivers? The council set the fayre tariffs but do not stipulate the minimum amount that is passed on to the driver as a living wage.

My experience that charges set by the operator that I work for on a self employed basis!) make it impossible through their mileage charges and operating methodology to earn anywhere near minimum wage. The company are not responsible for the lack of work or time spent waiting for work. They use more drivers than necessary which far exceeds the work load and do not offer a minimum amount that can be earned in an 8 hour day. Time does not matter to them!

For example: The NFDC put tariff rates up by 5% in February 2023. The operator increase charges for drivers from £0.90 per mile to £1.15 per mile. An increase of 28%. Therefore, taking in to account the NFDC increase of 5% the drivers immediately lost a total of 23% of their income during a cost of living crisis!

Is the NFDC not responsible for this treatment?

I believe tint is allowed on rear windows by law. All taxi with tint windows are preferred by passengers. In taxi Business customers love their privacy and that is why all taxi drivers use tint papers. Only luxury cars are manufactured tint because it cost a lot of money. So all other cars have to arrange it privately to tint the rear windows. I request council to look on this amendment.

We oppose this point for a few reasons, many vehicles still do not come with air conditioning and so the only reason we put tinted film on our windows is for passenger comfort. It goes without saying that if you sat in a greenhouse for an hour or so you would become very uncomfortable and potentially very adjitated. This is very similar to sitting in a minibus in the middle of summer.

If I may quote an extract from your proposal, "windows tinted during the build of the vehicle (factory fitted) are permitted to be used on a licensed vehicle." I honestly don't see how it effects proceedings whether the vehicle tints are factory fitted or if window film has been applied after the fact. They both have the same effect on the passenger by cutting UV light coming into the vehicle thus making it cooler inside the vehicle. If I may quote another extract from a different appendix "Maintains a professional fleet for local customers and visitors to the near and raises standards". I know for a fact that if visitors to the New Forest are forced to sit in vehicles with no air conditioning because it wasn't fitted at factory and the vehicle doesn't have tinted windows because you are forcing us as drivers/operators to remove the film, this will have the total opposite effect to what you are trying to achieve and if anything the standards will fall and visitors will not use taxis (both hackney carriage and private hire).

The DFT has said 8.8 Tinted windows

Authorities should carefully consider the views of the public and the trade when considering the acceptance of 'after-market' tinting and should be assured that any after-market window tinting does not negatively affect the safety features of the glass it is applied to.

Euro NCAP rating 4 is good. However, 5 should be the aim. Also, it seems that this point isn't binding - it is a recommendation that something should be considered. Could or should the wording be strengthened here?

Probably better to choose a Licencing authority that doesn't have massive waiting times, and can use the bus lanes on Southampton