



Report to: Licensing and Environmental Health Committee, 19 June 2023

Report of: Head of Worcestershire Regulatory Services on Behalf of Worcester City Council

Subject: HACKNEY CARRIAGE AND PRIVATE HIRE VEHICLE AGE POLICY REVIEW

1. Recommendation

That the Committee:

1.1 Note the contents of this report, and in particular the consultation feedback document at Appendix 1.

1.2 Recommend to Council that it:

- i. Approves an amendment to the existing hackney carriage and private hire vehicle policy, to include that 'No lower or upper age limit restrictions will apply in respect of 'all fully electric' new and replacement hackney carriage and private hire vehicles presented to the Council for licensing'.**
- ii. Approves an amendment to the existing hackney carriage vehicle age policy, to state 'The current lower vehicle age limit applicable to all new, replacement and temporary hackney carriage vehicles is 5 years from the date of first registration'.**

2. Background

2.1 Worcester City Council declared a 'Climate Emergency' in July 2019 and committed to act with the ambition of making the city carbon neutral by 2030. To support this ambition the Council has developed and published the Worcester City Council Environmental Sustainability Strategy 2020 – 2030.

2.2 One of the focus areas in the strategy is 'Transport' with one of its aims being to work with local taxi operators to facilitate the transition to zero emission taxis and introduce a new licensing strategy to support this.

2.3 This is in line with the UK Government's commitment to promoting cleaner motoring by reducing transport emissions and ending the sale of new petrol and diesel vehicles by 2030 and making all passenger vehicle sales zero emission vehicles by 2050.

2.4 During its meeting on 6th March 2023, and to incentivise the transition to electric vehicles, this Committee directed officers to undertake a public and stakeholder

consultation exercise on a proposal to amend the council's hackney carriage and private hire vehicle age policies, as follows:

- That no upper or lower age limit restrictions are to apply in respect of 'all fully electric' new and replacement hackney carriage and private hire vehicles.

2.5 In addition to the above proposal and following a formal request from existing vehicle licence holders at a Taxi Forum meeting, the Committee also directed officers to consult on a proposal to amend the council's hackney carriage vehicle age policy, as follows:

- That the current lower age limit for new/replacement hackney carriage vehicles to be amended from 3 years (currently) to 5 years (proposed).

2.6 The rationale put forward in respect of the second proposal, is that it would enable existing and potential licence holders to purchase a replacement or first-time vehicle at a lower cost (due to older age), thus enabling the difference to be saved and put towards an electric vehicle at some stage in the future whether that be driven via local or national policy requirements.

2.7 There is obviously an element of risk associated with such a policy as the Council has no control over the individual finances of licence holders. It does however provide a further incentive to licence holders to transition and help build a momentum when thinking about a timetable for electrification of the taxi fleet.

2.8 Some concern was raised at Committee about the introduction of an electric vehicle policy which doesn't specify a lower or upper vehicle age limit. Officers highlighted the fact that any change to vehicle age policy would not undermine any other requirement placed on a licence holder or their vehicle in respect of condition, internal space and arrangements, safety, signage, cleanliness etc. furthermore electric vehicles would still be subject to the twice-yearly safety inspections, which are required for all licensed vehicles.

2.9 Concern was also raised regarding the risks associated with extending the current hackney carriage vehicle age limits, in that drivers and operators may simply continue to purchase and use older polluting petrol and diesel vehicles until the Governments cut off dates of 2030 and 2035. Officers highlighted the fact however that the Council may wish to consider its taxi licensing policy position at some stage in the future with a view to legislating (through policy) an 'all electric' or 'low emission' fleet ahead of 2030 and revisit the work undertaken previously that investigated electrification of the taxi fleet.

2.10 In addition, officers will be reviewing the council's hackney carriage and private hire vehicle licensing policies, following the publication of The Department for Transport's "Taxi and Private Hire Best Practice Guidance" which is currently in the final stages of review. The findings will be presented to Committee for consideration at a later date.

3. Consultation

3.1 Consultation was undertaken over an 8-week period between 24th March 2023 and 22nd May 2023. It comprised of a survey which was available to complete online via the Council's website and was promoted by the Council's Communications Team,

across a range of channels. Paper versions of the consultation survey were also made available for those that wished to respond in that way.

3.2 Information on the consultation, along with details on how to respond were also sent directly to:

- Worcester City hackney carriage and private hire licence holders
- The Worcester Taxi Association
- National Private Hire and Taxi Association
- Licensed Private Hire Car Association
- West Mercia Police
- Safer Roads Partnership
- Worcestershire County Council - Relevant contacts at Worcestershire County Council, including those responsible for safeguarding children and adults and arranging home to school transport
- Relevant interest groups, including those that represent people with disabilities and the elderly
- Relevant local business groups via Worcester BID
- Elected Members

3.3 In total, the consultation attracted 132 responses. Of those, 78 indicated that they were holders of either a taxi/private hire driver, vehicle, or operator licence. In addition to these, there were also responses from West Mercia Police, City Councillors, local residents, local businesses, users of taxi's or private hire vehicles and local interest/community groups. A copy of the questions and all the responses received during the consultation are attached at **Appendix 1**.

3.4 In response to proposal 1 ("That no upper or lower age limit restrictions are to apply in respect of 'all electric' new and replacement hackney carriage and private hire vehicles"), 69 respondents (66%) agreed with this proposal. Of the 35 (34%) respondents that did not agree with the proposal, some of the relevant reasons cited were:

- A vehicles age and condition should always be taken into account when considering whether it is suitable to be licensed,
- Electric vehicles should not be exempt from the licensing requirements
- Electric vehicles will deteriorate with age
- Electric vehicles need to be safe
- Older electric vehicles will be bought onto the fleet in coming years
- There is support to extending the age restrictions, but not removing them entirely, as having no age may create problems for the future

3.5 When respondents were asked to put forward possible alternatives to the current upper and lower vehicle age limits for member and officer consideration, many took the opportunity to simply site financial hardship as being an issue, rather than putting forward suitable alternative age limit suggestions for consideration. Of the other various options put forward, there was no clear indication from the responses of a preferred vehicle lower or upper age limit.

3.6 In response to Proposal 2 ("That the current lower age limit for new/replacement hackney carriage vehicles to be amended from 3 years (currently) to 5 years (proposed)"), 87 respondents (87%) agreed with this proposal. Of those in favour with

the proposal the majority again cited financial hardship as their main concern, whilst others made the following relevant comments:

- This should be temporary and there should be proof that this is what the individual license holder is intending to do. Otherwise the roads will be flooded with older taxis, and we will be in the same place in 5 years' time.
- I think this is a fair proposal as most cars that are 5 years old have been designed to be economical and have low emissions
- As previously stated, our responsibility is to the safety of passengers, we should not be reducing standards
- Keep the current 3-year rule. Extend the life of each vehicle by 2 years
- You are lowering standards which should not happen
- This would only bring older hackney vehicles in
- If this specifically for electric / ultra-low emissions vehicles. Otherwise no

3.7 In summary, the majority of respondents are in favour of both proposal 1 and proposal 2. The perception that safety and condition of vehicles would be undermined as a result of both proposals can be significantly, if not fully mitigated by the fact that any change to vehicle age policy would not undermine any other requirement placed on a licence holder or their vehicle in respect of condition, internal space and arrangements, safety, signage, cleanliness etc. Furthermore electric vehicles would still be subject to the twice-yearly safety inspections, which are required for all licensed vehicles.

4. Preferred Option

4.1 Having considered the results of the recent consultation exercise and also the comments put forward by the respondents, the preferred options being put forward for Member consideration are:

4.2 Proposal 1 - Introduce a new licensing policy for fully electric vehicles only, where there are no lower or upper age limit restrictions on vehicles which can be licensed with the Council as either a hackney carriage or private hire vehicle. All other conditions and policy implications will still apply.

4.3 Proposal 2 - Amend the current hackney carriage vehicle age policy, by increasing the lower age limit restriction from 3 years to 5 years.

5. Alternative Options Considered

5.1 Members may wish to consider the following alternative options:

5.2 Introducing an age limit for electric vehicles has been considered, in line with those of the Hackney Carriage vehicle age policy. However, it is highly likely that given the technological advances in electric vehicles that drivers would be required to buy a more modern type of vehicle to ensure size criteria is met and that they have sufficient mileage range to meet their needs.

5.3 Furthermore, as outlined already within the report, any change to vehicle age policy would not undermine any other requirement placed on a licence holder or their vehicle in respect of condition, internal space and arrangements, safety, signage, cleanliness etc. furthermore electric vehicles would still be subject to the twice-yearly safety inspections, which are required for all licensed vehicles.

- 5.4 Continuing with the lower vehicle age limit of 3 years for hackney carriage vehicles has been considered. With cost however continuing to be cited as the primary reason for why licence holders will not purchase an electric vehicle, then extending the minimum vehicle age limit is an incentivisation tool that would not undermine the safety of vehicles and would importantly mean that all new or replacement vehicles coming onto the fleet would meet minimum emission standard Euro 4 (petrol) and Euro 6 (diesel).

6. Implications

Financial and Budgetary Implications

- 6.1 There are no financial or budgetary implications associated with this report and any work undertaken to progress the recommendations and subsequently the implementation of any policy change will be undertaken by Worcestershire Regulatory Services within existing resources.

Legal and Governance Implications

- 6.2 When considering any application for a Private Hire Vehicle Licence, the Council, in accordance with Section 48(a) (i) (iv) and (v) of the Local Government (Miscellaneous Provisions) Act 1976 shall not grant such a licence unless they are satisfied that the vehicle is suitable in type, size and design for use as a private hire vehicle.
- 6.3 Under Section 47 of the Act the Council may attach to the grant of a hackney carriage licence such conditions as it may consider reasonably necessary.
- 6.4 Under Section 48 of the Act the Council may attach to the grant of a private hire vehicle licence such conditions as it may consider reasonably necessary

Risk Implications

- 6.5 To minimise any risk of legal challenge when introducing new or amending existing hackney carriage and private hire licensing policy, officers have undertaken a full public consultation on the proposals contained within this report, those consulted were licence holders, relevant stakeholders, and the general public. The outcome of this consultation will also be considered by Members of the Licensing and Environmental Health Committee prior to any changes taking place.

Corporate/Policy Implication

- 6.6 All regulatory policies relating to Environmental Health and Licensing approved by Worcester City Council should comply with the Regulators Code. The Regulators Code is made under the provisions of the Legislative and Regulatory Reform Act 2006. It seeks to promote proportionate, consistent, and targeted regulatory activity through the development of transparent and effective dialogue and understanding between regulators and those they regulate.
- 6.7 The proposals set out within this report seek to further incentivise existing and new hackney carriage and private hire vehicle operators and drivers to transition to electric vehicles. This links to the theme of 'Enhancing and Sustaining our Beautiful City for Future Generations' within the Worcester City Plan 2022 – 2027. Within this theme the Council is committed to 'combatting the climate change emergency by leading city-wide measures to reduce carbon emissions' and 'improving air quality through a reduction in carbon emissions.

Equality Implications

- 6.8 The Licensing and Environmental Health Committee will ensure it has regard to the desirability of exercising its functions with regard to the need to eliminate discrimination and to increase equality of opportunity.

Human Resources Implications

- 6.9 No Human Resources Implications have been identified.

Health and Safety Implications

- 6.10 As outlined in the report all other criteria that would be applied to vehicles in respect of physical condition, visual condition, safety, and signage etc will remain unchanged and therefore, there are not considered to be any health & safety implications associated with this report.

Social, Environmental and Economic Implications

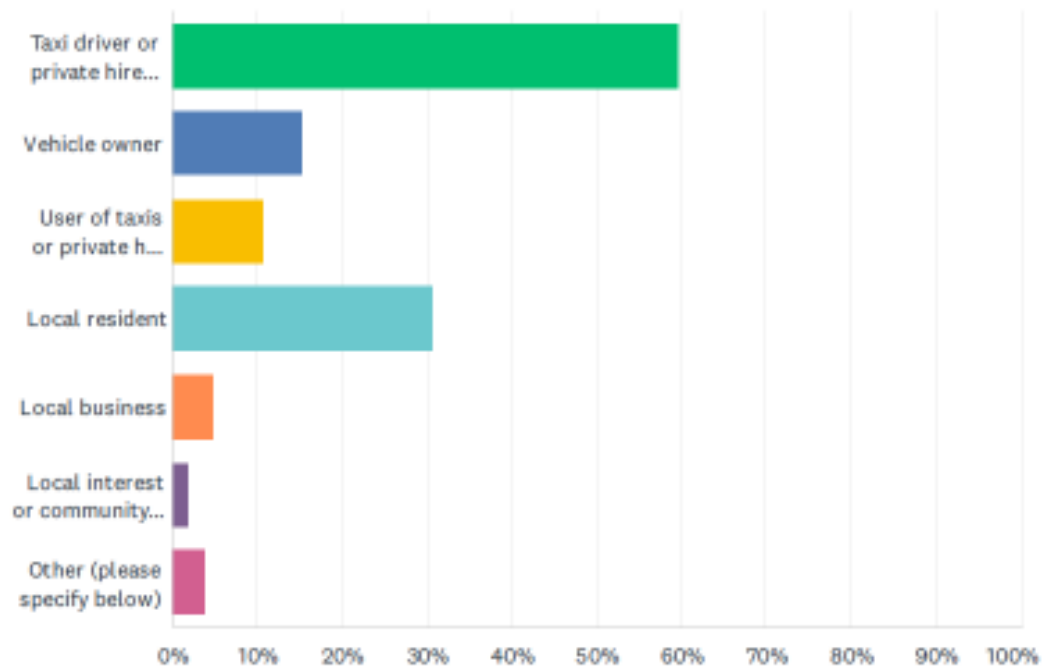
- 6.11 The removal of age limits in relation to fully electric new/replacement hackney carriage vehicles and new/replacement private hire vehicles may encourage the licensing of electric vehicles by existing licence holders, which will contribute to improving air quality. It will also encourage behaviour change and play a part in the city seeking to become carbon neutral by its target date of 2030.
- 6.12 Enabling operators and drivers to purchase and licence older vehicles will have a positive financial impact and encourage a sustainable taxi fleet to serve the needs of residents and visitors serving both the daytime and night-time economies.
- 6.13 When considering the impact of the proposed amendments to policy, members should note there are currently 253 hackney carriage and 60 private hire vehicles licensed by the Council. Members should further note that the Council has in place a cap or limit on the number of hackney carriage vehicle licences which it issues, this means that any proposed change to policy, as highlighted in this report will not lead to an increase in hackney carriage vehicle numbers.

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Background Papers: None

HACKNEY CARRIAGE AND PRIVATE HIRE VEHICLE AGE LIMITS SURVEY CONSULTATION RESULTS

Details of respondents, I am responding as:



ANSWER CHOICES	RESPONSES
Taxi driver or private hire driver	59.62% 62
Vehicle owner	15.38% 16
User of taxis or private hire vehicles	10.58% 11
Local resident	30.77% 32
Local business	4.81% 5
Local interest or community group (please specify below)	1.92% 2
Other (please specify below)	3.87% 4
Total Respondents: 104	

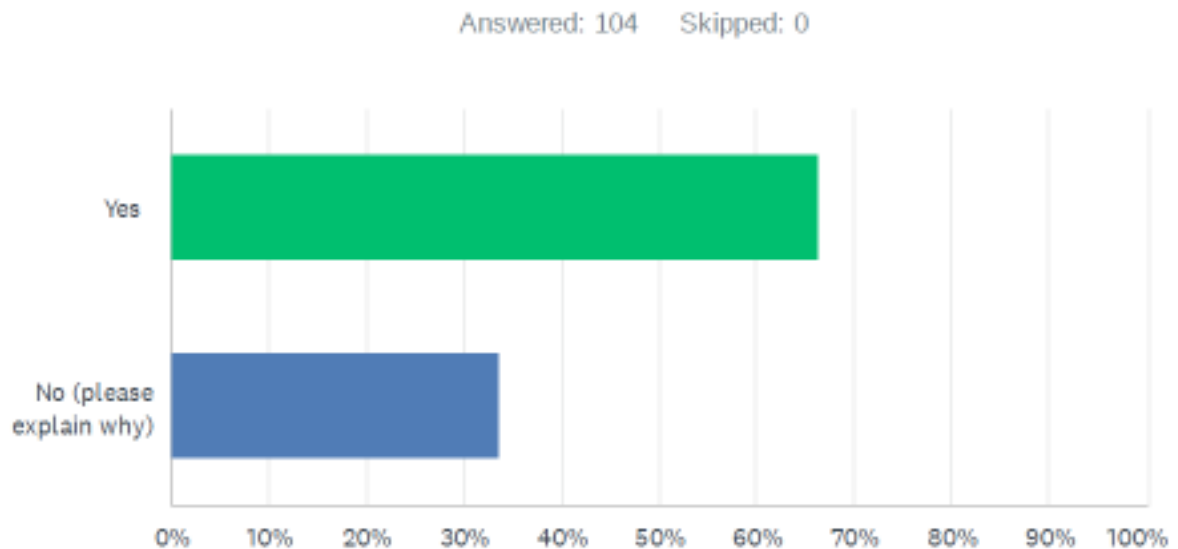
#	PLEASE SPECIFY (IF APPLICABLE)	DATE
1	Worcester City Cllr	4/17/2023 8:08 AM
2	Police Licensing Officer	4/11/2023 11:12 AM
3	City Councillor	4/9/2023 6:59 PM
4	Councillor	4/9/2023 9:51 AM
5	Worcester city driver	3/31/2023 11:00 AM
6	taxi owner operator in Scotland	3/29/2023 8:41 AM

PROPOSAL 1 - ELECTRIC VEHICLES

The Council is proposing that any fully electric vehicle presented for licensing, as either a Hackney Carriage (taxi) or Private Hire vehicle will not be subject to any age restrictions.

It has been cited that this will encourage drivers and vehicle owners to purchase fully electric vehicles.

Q - Do you agree with this proposal



ANSWER CHOICES	RESPONSES	COUNT
Yes	66.35%	68
No (please explain why)	33.65%	36
TOTAL		104

No - Please explain why

1.	Vehicle age, and condition should still be taken into account in all circumstances.
2.	For taxi trade it should be a hybrid taxi where you can drive long hours. only electric cars not good for taxi trade because life of the battery is not enough. Then you have to off from work and finding charging point.
3.	Because there is no infrastructure for electric vehicles. Milage on electric vehicles are restricted so on a busy weekend drivers will be busy charging the vehicle rather than driving it. Plus electric vehicles are more dangerous and cause more problems to the environment than your combustion engine and its scientifically proven.
4.	Electric vehicles are too expensive

5.	I don't see why just because a vehicle is electric, it should be exempt of the licensing requirements adhered to by other taxis. Will it also not be required to follow the same safety policies either then? Where do we draw the line? In my view, with the dangers associated with the batteries in electric cars, they should be assessed more stringently, not less.
6.	In the future, this may be problematic as old vehicles that are not as safe may be used
7.	Vehicles need to be safe. Age criteria should apply to all vehicles.
8.	An EV still deteriorated in terms of condition, brakes etc and in order to ensure that taxis are safe a reduction in age limit is not acceptable.
9.	Unsustainable.
10.	How taxi driver can afford
11.	The cost of purchasing the vehicle is too expensive. Electric have not had, the same research and development as petrol and diesel vehicles.
12.	Hybrid should be included
13.	Electric cars are not reliable because they are not useful for long shifts
14.	Electric vehicle does not cater for customers who might want to be transferred to airports or out of the city boundary, for example a half charged vehicle will need to be charged in a service station and a customer will need to wait and be charged for wait time, this sort of vehicle is a problem for the trade
15.	Will be very hard for the taxi trade. Will possibly kill the trade off
16.	Its not viable at this present time to buy electric car too expensive
17.	Council also need to look into getting hybrid vehicles as some electric vehicle gives you about 200 miles from the full charge depending on the weather and time as everything works on batteries if you driving in cold rainy weather at night it will give you lesser mileage as lights heating and viper all draining batteries for an instance trip to London could take you too long to complete compare to hybrid or fuel driven cars
18.	Electric vehicles are really expensive
19.	I think some drivers will not be able to keep their taxis in good working order if they don't have an age limit. I think it should be limited to 15 yrs.
20.	Electric vehicles doesn't give enough mileage to cover 1 shift work pulse they are too expensive
21.	Too expensive to buy
22.	Too expensive
23.	Electric vehicles still unsustainable from an earnings point of view and the high upfront cost is not able to be negated from the availability of work within Worcester
24.	Older Vehicles could be brought in.

25.	However the council should incentivise the scheme as those vehicle are expensive and work is not busy - eg get funding from central government or no fees for 4 years. There are not a lot of electric wheelchair vehicles so driver should be given the choice to get non wheelchair access. Majority of the taxi are Peugeot partners which are wheelchair access I would like to get a plug in hybrid or fully electric however due to market not having such option I'm stuck with a diesel car. It's not very comfortable for passengers too . Drivers should be given the choice to choose a saloon car or wheelchair access when they present a new car to licence
26.	No
27.	The charging not enough charging points
28.	Some cars half electric and they are 15 years old so electric vehicles should be no more then8 years old
29.	No
30.	Currently there is not enough choice off electric Hackney vehicles and they are to expensive to buy
31.	Issue with long distance jobs, for example now if I go to London Heathrow, I can come bk on half a tank of fuel, if it was a electric car I would need to pay for parking and charging , wait more that an hour before coming back, I will be losing out time and money. also issue with with charging points on ranks and outside houses, not all drivers have driveways so they msy not a parking spot outside their houses. Price cost electric cars are very expensive, battery with will not hold as much range as much as it would be shown, because taxi are used a lot more than private vehicles. Heaters, lights radio will reduce the battery life.
32.	No unfortunately due to the hours drivers work and the charge timing for vehicles this isn't available option at all. The cost of any fully electric vehicle isn't cheap whether its a larger people carrier or a saloon. If there isn't an age limit the problem is older electric vehicles won't might be slightly cheaper but more likely to encounter problems with the batteries etc So doesn't make sense at all
33.	Too expensive
34.	The reasons cited would to me support extending the age restrictions, not removing them entirely. Particularly ss. Why not set that at 10-15 years which allows for a review later?
35.	Because there's already a 2 year age difference between hackney and PH replacement vehicles. Due to the cost of the vehicles virtually nobody can afford them as the cost is treble that of anormal cab or PH

PLEASE INDICATE WHAT YOU THINK MAY BE A SUITABLE ALTERNATIVE TO:

The lower vehicle age limit (this is the maximum age at which a vehicle can be presented to the council for the first time),

Or:

The upper vehicle age limit (this is the maximum age which a vehicle can continue to be licensed as a taxi with the council)?

~~Answered 27 August 17~~

Responses

1.	The criteria for vehicles should be overall condition (mechanically, structurally, running gear, interior condition), not age, although age may be a factor in these.
2.	5 years old
3.	Lower the age limit so instead of 3 years allow 5yrs.
4.	I think 10 years is an acceptable maximum age limit.
5.	Upper age limit is fine
6.	Always need an age limit, no alternative
7.	Neither
8.	Vehicles should be have MOT and should be regularly checked for insurance and their licences to avoid corrupt practices.
9.	Over 6 years old for the date of 1st registration. Maximum no limit for expiry
10.	Keep the existing age limit for new vehicles. Extend the life of vehicles.
11.	Hybrid is a solution, however it comes an expensive option and the councils proposal grant is not enough, which will cause financial distress.
12.	5-7 years
13.	Under the current circumstances the council should accommodate the drivers in every way possible as the cost of living is going through the roof I would suggest 5 year old from the first registration and should expiry should be pushed too (Saloon cars should be able to have it licensed up till the age of 10 years side access wheelchair vehicles to 15 years
14.	2 or 3 year criteria is just right
15.	10 years
16.	Under 5-year-old
17.	As long as vehicle passes normal mot or under 5 years old

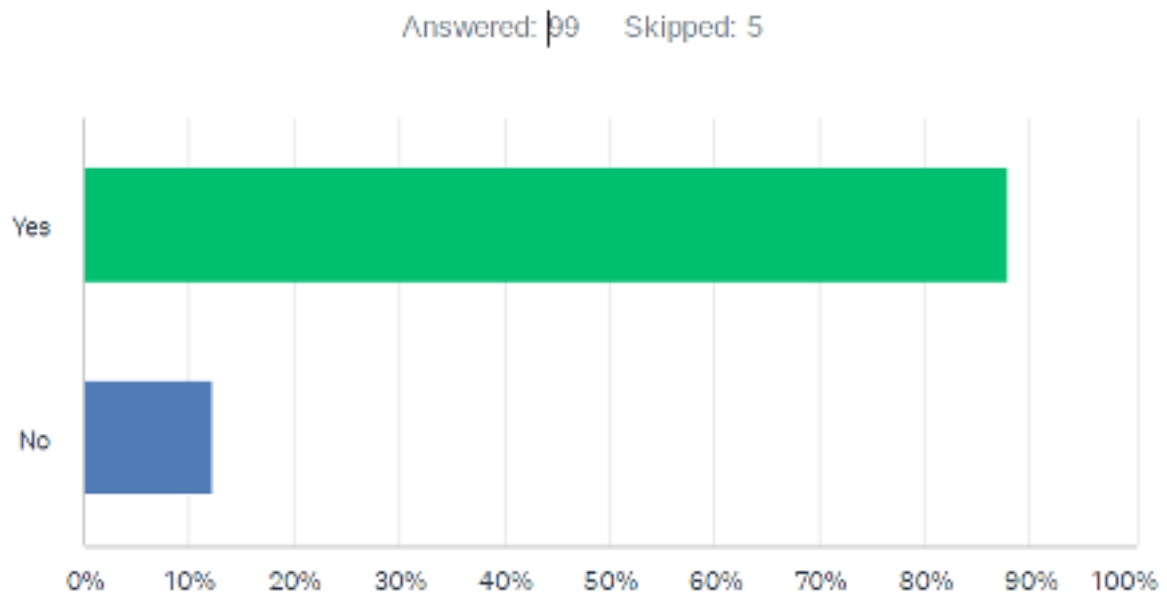
18.	The Upper Limit.
19.	Modern cars can last longer then 10 years or 8 years for saloon So increase first application to 5 years and give 10 plates
20.	Lower the age
21.	Life time
22.	I think this should be five years for first time registering the Hackney vehicle and as long as it's been looked after well it should be continued to be licensed
23.	increases the limits so our car can be used longer, if the taxi is in a good condition.
24.	Make the age for vehicles not the current 3 year old bracket To open and make it so you can at least have vehicles that are up to 5 or even 6 years old
25.	7 years old vehicle
26.	Upper limit of 10-15 years
27.	We in Scotland have a maximum age limit of 10 years 11 months , if a PH vehicle is to be licenced it has to be under 7 years 11 months , a wheelchair accessible hackney or PH can stay on as long as possible as long as they are kept in extremely good order

PROPOSAL 2 – HACKNEY CARRIAGE VEHICLE (TAXIS) LOWER AGE LIMIT

The Council is proposing to increase the lower vehicle age limit (this is the maximum age at which a vehicle can be presented to the council for the first time) currently 3 years, to 5 years.

It has been cited that this would help drivers and vehicle owners prepare financially for the transition to electric and (or) ultra-low emission vehicles in the future.

Q - Do you agree that the Council should increase the lower vehicle age limit for Hackney carriage vehicles (Taxis) from 3years (currently) to 5years?



ANSWER CHOICES	RESPONSES	
Yes	87.80%	87
No	12.12%	12
TOTAL		99

Please Provide Reasons for The Answer You Have Given

1.	Vehicles can still be in a good condition at 5 years.
2.	3 years old vehicle are very expensive now
3.	This should be temporary and there should be proof that this is what the individual license holder is intending to do. Otherwise the roads will be flooded with older taxis, and we will be in the same place in 5 years' time.
4.	Well, it makes sense considering the price hike on everything whilst the council is pocketing the profits. It's about time the council stop being crooks.
5.	Cars are now better for the environment than those in the past

6.	I think this is a fair proposal as most cars that are 5 years old have been designed to be economical and have low emissions
7.	It is reasonable to allow Taxi drivers to have the ability to lower the vehicle age limit to allow them to fund newer electric vehicles in the future, provided they are still tied to the twice-yearly vehicle checks and keep the vehicles in good working order as dictated by Road Traffic Act and other legislation.
8.	As suggested, it will give time to prepare, but I think there should be an overall limit on the age of a car being used for reason previously stated
9.	Age criteria should apply
10.	As previously stated, our responsibility is to the safety of passengers, we should not be reducing standards.
11.	if there is no age limit for EVs then those who can't afford new ones can purchase second hand
12.	More then 5 years please in that taxi driver got facility to purchase decent car for his business. I would say council should approved 6years old car as Hackney and 8years old as private hire
13.	Keep the current 3-year rule. Extend the life of each vehicle by 2 years.
14.	Increased car prices have made it impossible to buy hybrid or electric cars as there isn't the same amount of work there was precovid times.
15.	By lowering the age limit it would help taxi driver financially as u know the current market for buying cars it's very expensive specially if u buy a 3 year old. Thank you
16.	The cost-of-living crisis
17.	Cost of living crisis
18.	it's become financially impossible to purchase 3 year old vehicles or newer
19.	Vehicle prices so high
20.	5 year age limit should be increased to 7 years, and should not be allowed to be re used in Wychavon Council plated or another council who operate back in Worcester. They are represent us Worcester when they have no knowledge of the streets.
21.	Majority of taxi drivers I have spoken to are struggling with the cost of living and taxi expenses
22.	Cost of living hardship and debts will make hard for drivers like myself to finance/rent vehicle in current circumstances the price of used vehicles is at a current high level
23.	Cost of living crisis
24.	You are lowering standards which should not happen
25.	The cost of living is too high
26.	With less investment u can buy good car drivers don't have to do extensions on old cars u can maintain the standard

27.	I think lowering the age of the vehicle will benefit the drivers and the the users. drivers will have the option to buy more types of taxis (electric, hybrid, wheel chair accessible) also the cost of the vehicles will make drivers able to change the cars more often making the vehicle standards higher and more environmentally friendly
28.	Because not everyone can afford cars that are only 3 years old especially with the current financial crises that's going on
29.	5 year old vehicles are ulez compliant and little bit cheaper to buy
30.	Financial crisis cost of living
31.	Having an age limit will still mean an electric wheelchair accessible vehicle would still be prohibitively expensive. A 5 year old electric London taxi is still £40000 . No age limit until electric vehicles are more affordable would be a better idea. No age limit does not mean the vehicles are unsafe or dangerous as the safety checks are still carried out twice yearly.
32.	Allows choice of a wider variety of vehicles to be used by taxi drivers as many popular choices are now financially out of reach and are no longer available
33.	This would only bring older hackney vehicles in.
34.	We are going through living crisis and interest rates are on the rise fuel is expensive. So five year would make sense however additional plates should be provide eg if we present 5 year old car then we shouldn't be just left with 5 plates which defeats the objective. Any car presented up to 5 years should get 10 year for 5 or 3 year old , then driver can decide
35.	I think that all vehicles should be in line with Wychavon and an up to 10 years of age should be the policy for non-electric vehicles just because a vehicle is 9 years old doesn't mean it should not be plated you can get very low mileage vehicles that are better presented and looked after than a high mileage under 5 years old perhaps a mileage limit would be more appropriate than age limit
36.	Quick win. Worcester polluted and old vehicles generate a lot of nox, ppms.
37.	It might take some of the older vehicles off the road
38.	3 years age is under warranty and so expensive
39.	As the current situation with the new cars there is a shortage, when we need to be precise about finding the exact under 3 year old for a particular model it is really difficult to find one At least with 5yrs old rule we can have more choice and I believe most drivers will opt for 4yearold or maybe stick with 3 year old as sometimes you can find better deals when the car is let's say 3yrs 2months
40.	Because 1- The 3 year's old too expensive 2 -We can find many car to be wheelchair accessible and under 3 years old 3 - however when I our car finish the age they can use still in Worcester road again in different council, for example Wychavon council ,driver apps and wooper apps using under 10 to 15 years old ,and they're plating again. Thank you
41.	Cost of used vehicles Shortage of new vehicle supply has increased the price for used cars market over the last 4 years
42.	Because vehicles are expensive. And you letting Wychavon vehicles to work in Worcester with old cars and taking our customers away

43.	Keep the costs down
44.	On the basis that the ev rules come in and that there is a max age of a vehicle
45.	If this specifically for electric / ultra low emissions vehicles. Otherwise no.
46.	While the proposal would help drivers and owners still financially recovering from covid lockdowns, I don't think it will help much with purchase of new vehicles (which tend to be bought on credit). Older vehicles are more polluting (not only tailpipe emissions - brake linings etc as well), so should be discouraged.
47.	Yes Both Hackney and PH should be on the same age limit

ANY OTHER COMMENTS?

Do you have any additional comments that you wish to make in connection with this matter?

Answered: 25 Skipped: 79

1.	3 years is still the more desirable option.
2.	Needs to be electronic cable gullies installed in streets where taxi drivers live
3.	No
4.	Happy with this proposal as long as there are regular vehicle interior condition checks as this is what the vehicle age requirement is a proxy for. Also for non-electric vehicles could consider having a minimum vehicle emissions standard for new registrations.
5.	It is important the council provides an age criteria across all vehicle types
6.	While I have some sympathy for taxi drivers and the ever-increasing costs they incur, I do not believe that we should be lowering standards in terms of safety.
7.	Taxis should be made to offer card services so that all customers can use taxis more freely. This would also ensure that they are paying their taxes.
8.	If council want to make this city proud and attractive, then council have to provide and listen trade. Otherwise, city of Worcester people's will suffer their lives because outsiders came as public hires and council doesn't have power to check those drivers. Council have to protect our trade instead putting people's lives . Outsiders as public hire no traceability and more crime
9.	Extend the life of all taxis by 2 years.
10.	I prefer 5 year old vehicle
11.	Electric vehicles are good for local runs but are and will be a problem for long distance journeys and customers will not pay waiting time.
12.	Enforce 6 month vehicle checks more thoroughly to ensure safer taxis for passengers on older cars which are fine to drive when maintained correctly
13.	Inflation in price of vehicles is not being discussed, taxi drivers' income has not increased online with their related expenses
14.	Reduce the amount of taxis in the city!
15.	I feel like me being a Worcester Hackney driver I am paying way more for a taxi then a driver from Wychbold who's implies his/her trade in Worcester and there cars are way older than ours so I feel we should have a bit of a leverage as far as age of cars of concerned
16.	No

17.	We should now be in line with Wychavon licensing for all policies/costs which would then stop cross boarding
18.	Too many cars in W..older cars pollute. Pollution major issue. Better transport needed.
19.	I believe the traditional black cabs should be off the road by now as they are most polluted vehicles in my view with the tx1 model with an engine capacity 2.7litres no Morden technology in reducing the pollution Tx4 was a failure too By the London taxi international Please find the facts and revise the age limit unless you make an infinite number of years for fully electric cabs levv taxi they will stand out and a lot of drivers will go for the electric London cabs it's one of the best cabs made engineered by Volvo who always get an award for safety
20.	Yes please we not have much business, and have to wait 2 hours until pick up one job because of too many taxi from Wychavon council and some uber driver ,they come to our city to work .please should stop driver apps and wooper apps
21.	This should be changed as soon as possible
22.	One rule for all. At the moment Worcester private hire is 5 years old Worcester Hackney is 3years old. And you letting Wychavon to work in Worcester with 10 years old vehicle this is absolutely out of order
23.	Incentivise the transition to electric vehicles. Best spot in taxi rank is for EV only. EV only ranks.
24.	The taxis and ranks in Worcester need far better monitoring by regs services. They are consistently breaking licensing rules
25.	The move to electric / ule needs to be speeded up. Are there incentives available to encourage change of vehicles for licensed owners?