

**REPORT TITLE:** Hackney Carriage and Private Hire Vehicle Specification Policy Review

Licensing and Safety Committee – Wednesday 14<sup>th</sup> February 2024

<b>Cabinet date</b>	<b>N/A</b>
<b>Cabinet Member</b>	<b>Councillor Mussarat Pervaiz</b>
<b>Key Decision Eligible for Call In</b>	<b>No No</b>
<b>Purpose of Report</b> The purpose of the report is to inform members of the results of the consultation for the proposed changes to the Council's current Hackney Carriage and Private Hire Vehicle Specification Policy	
<b>Recommendations</b> <ul style="list-style-type: none"> <li>Members make a decision in relation to the draft policy following full consideration of all responses to the consultation.</li> </ul> <b>Reasons for Recommendations</b> <ul style="list-style-type: none"> <li>A decision is required regarding the proposed policy amendments following full consultation.</li> </ul>	
<b>Resource Implications:</b> There are no resource implications relating to this report.	
<b>Date signed off by <u>Strategic Director</u> &amp; name</b>	Rachel Spencer-Henshall – 26.01.2024
<b>Is it also signed off by the Service Director for Finance?</b>	Isabel Brittain – 31.01.2024
<b>Is it also signed off by the Service Director for Legal Governance and Commissioning?</b>	Julie Muscroft – 26.01.2024

**Electoral wards affected:** All

**Ward councillors consulted:** None

**Public or private:** Public

**Has GDPR been considered?** Yes, there is no personal information contained in this report.

## 1. Executive Summary

1.1 this report details the outcome of the consultation process in respect of the review of the current hackney carriage and private hire vehicle specification policy.

1.2 Members are asked to make a decision regarding the proposed changes to the policy following a review of the results of the consultation.

## 2. Information required to take a decision

2.1 The current vehicle specification policy, shown at **Appendix 1**, has not been reviewed/amended since July 2008.

2.2 Following discussions with the Hackney Carriage and Private Hire associations and engagement meeting with the hackney carriage and private hire licensed trade, several matters were raised regarding the existing vehicle specification policy. Some of the issues raised were:

- Vehicle age limits
- Window tints
- Door signs
- Vehicle testing
- Cost

2.3 Following the engagement with the trade a review of the policy was undertaken, including consideration of the matters raised by the hackney carriage and private hire trade.

2.4 All the issues raised were considered, other than the cost of a licence as this calculated in accordance with the administration of applications and ongoing compliance costs. Licence costs will be addressed separately during a review of all the hackney carriage and private hire fees. In addition, vehicle testing is being reviewed separately.

2.5 A copy of the draft policy can be found at **Appendix 2 (deletions are in red with a strike through and proposed amendments can be seen in blue)**.

2.4 At the meeting of the Licensing and Safety Committee on 19<sup>th</sup> July 2023, members resolved: -

- 1) That the hackney carriage and private hire vehicle specification policy review report and associated appendices be noted.
- 2) That the authority be given for officers to commence a 12-week consultation regarding the proposed changes to the existing vehicle specification.
- 3) That the report outlining the results of the consultation be considered at a future meeting of the Licensing and Safety Committee.
- 4) That the proposed consultation questions, as appended to the considered report, be agreed with an additional question proposing no age limit for vehicles.

2.5 The Consultation ran for a period of 12 weeks and the consultation closed on Wednesday 22<sup>nd</sup> November 2023.

2.6 The survey resulted in an overall total of 374 respondents. The breakdown of respondents are as follows:

- 182 Members of the public
- 163 Licensed Drivers
- 9 Licensed Operators
- 7 Licensed Vehicle Proprietors
- 6 Local Ward Councillors
- 4 Other, these were:
  - Taxi rental company
  - Leeds taxi driver
  - A user of taxis in the area
  - National private hire and taxi association

2.7 A breakdown of the questions asked in the survey and responses can be seen at **Appendix 3**. In addition, 2 emails have been received in response to the survey and have also been added to appendix 3.

### **3. Implications for the Council**

#### **3.1 Working with People**

One of the licensing service's key priorities is to ensure the standards across the private hire and hackney carriage trade in Kirklees are high to protect the travelling public, this includes the standards of the vehicles used to transport passengers to and from their destinations.

We, as an Authority, want the residents of Kirklees and any visitors to the area to be transported safely, feel protected from harm, and experience a high quality, clean, sustainable, and green environment, as well as a good customer experience.

#### **3.2 Working with Partners**

In developing its policies and delivering its services the licensing team works with several partners including (and the list is not exhaustive), Kirklees Safeguarding Children and Adults boards, West Yorkshire Police, Public Health, Environmental Health, Overview and Scrutiny Committee, the Community Safety Partnership, and the other West Yorkshire Licensing Authorities (Inc. York).

#### **3.3 Place Based Working**

There is no specific impact in the context of this report. However, reviewing policies and procedures enables the service to examine the way in which it interacts and engages with the licence holders, residents, and communities.

#### **3.4 Climate Change and Air Quality**

Climate change is one of the biggest issues we face, increased carbon emissions caused by human activity, such as driving vehicles, are causing the rise in global temperatures. Kirklees Council's vision is to make Kirklees completely carbon neutral by 2048. The draft policy considers this, and it proposes the cleaner the engine the longer the licence.

The Climate Change and Air Quality team were involved in pre-consultation discussions in respect of the draft vehicle specification.

### **3.5 Improving outcomes for children**

The Council has a duty to protect the travelling public and safeguard the vulnerable including the transportation of children travelling in licensed vehicles.

### **3.6 Financial Implications**

There are no financial implications for the authority other than the cost of completing the consultation and these costs are met by the service.

### **3.7 Legal Implications**

There are no concerns from Legal regarding this report.

### **3.8 Other (eg Risk, Integrated Impact Assessment or Human Resources)**

#### IIA

There is no requirement for an IIA in this report.

#### Human Resources

There are no human resource implications contained in this report other than the officer time undertaking the consultation.

## **4. Consultation**

4.1 The consultation has been undertaken; the consultees were:

- All licence holders
- Public Health
- LADO
- Safer Kirklees Council Kirklees CCG
- All Ward Councillors
- MP's
- Susie Lamplugh Trust
- National PH and Taxi Association
- All neighbouring authorities
- Trade Unions
- West Yorkshire Police
- Members of the public via Council comms

## **5. Engagement**

5.1 Prior to the commencement of the consultation and amendments to the existing policy the licensing service offered 4 drop-in sessions for the hackney carriage and private hire trade to attend to discuss both the previous consultation for the Suitability Policy and for the trade to discuss any suggestions they may have had regarding the vehicle policy. These sessions were held:

- Tuesday 6<sup>th</sup> December – Cleckheaton Town Hall
- Wednesday 14<sup>th</sup> December – Dewsbury Town Hall
- Tuesday 20<sup>th</sup> December – Hudawi Centre Huddersfield
- Thursday 2<sup>nd</sup> February – Batley Town Hall

5.2 Discussions were held with trade representatives from both the hackney carriage and private hire associations.

5.3 In addition, the licensing service also held meetings to discuss the proposed changes with the Council's Transport Service, who carry out the vehicle compliance tests and also the Council's Climate Change and Air Quality Team.

## 6. Options

### 6.1 Options considered

Options: -

- i. Resolve to adopt the proposed policy, shown at **Appendix 2**.
- ii. Resolve to adopt the proposed policy with amendments, please confirm which sections members wish to amend and reasons for this decision.
- iii. Resolve to maintain the whole policy as existing, as shown at **Appendix 1**.

If members resolve to adopt the proposed policy or to adopt the proposed policy with amendments a decision is required about existing vehicles that may not meet the requirements of the new policy, therefore, members can:

- a) Resolve to allow for all existing vehicles to continue to be licenced until their licence reaches the upper age limit of the new policy or until the licence is cancelled/surrendered; or
- b) Resolve that all existing vehicles be required to comply with the requirements of the new policy.

### 6.2 Reasons for recommended option

Recommendation and reasons for each survey question: -

#### Question 1

Do you agree that hackney carriage vehicles should be white and private hire vehicles can be any colour other than white?

	Percentage	Number
Agree	65%	240
Disagree	30%	111
Don't know	5%	20

Officer Recommendation and Reason: -

It is recommended that members agree to amend the existing policy to the proposed change that no private hire vehicle can be white in colour. The reason for this recommendation is to ensure the public can clearly distinguish between hackney carriage and private hire vehicles.

The recently published Department for Transport Best Practice Guidance states:

“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.”

## Question 2

Do you agree wheelchair accessible vehicles should be licensed if they are Euro 5 diesel?

	Percentage	Number
Agree	75%	277
Disagree	13%	47
Don't know	12%	45

Officer Recommendation and Reason: -

It is recommended that members agree to resolve to amend the existing policy to the proposal to allow for Wheelchair accessible vehicles to be first licenced if they are Euro 5 diesel, the reason for this is the cost of wheelchair accessible vehicles is much higher than standard vehicles, we have limited provision of wheelchair accessible vehicles in Kirklees and this may encourage more license holders to purchase wheelchair accessible vehicles. It is accepted that the authority is working towards its climate responsibilities, however, we also need to strike a balance and offer some relaxation to fulfil the duties under the Equalities Act. The recently published Department for Transport Best Practice Guidance states:

“The physical accessibility of vehicles used to provide taxi and private hire vehicle services is a significant factor in the inclusivity of the overall service provided. Wheelchair accessible vehicles re essential for wheelchair users who are unable to transfer from their wheelchair to the vehicle, or who prefer to travel in their wheelchair.”

## Question 3

Do you agree that door signs for displaying operator details should be magnetic?

	Percentage	Number
Agree	65%	239
Disagree	23%	86
Don't know	12%	43

Officer Recommendation and Reason: -

It is recommended that members agree to the proposed change in relation to door signs as proposed in the draft policy and agree that private hire vehicles display magnetic door signs.

Most private hire vehicle proprietors work for more than one operator, currently, they are required to display permanent door signs that display their main operator and any additional operators they work for. This not only makes the vehicle look cluttered but is confusing for passengers. The best practice guidance confirms that private hire vehicle drivers and proprietors are free to work with more than one operator and licensing authorities should not have conditions or requirements that effectively tie a vehicle or driver to an operator.

## Question 4

Do you agree that all existing licensed Euro 5 standard vehicles, except for wheelchair accessible vehicles should cease to be licensed at 10 years old?

	Percentage	Number
Agree	47%	172
Disagree	44%	164
Don't know	9%	33

Officer Recommendation and Reasons: -

The current policy restricts all licensed vehicles to be no older than 10 years, the reason for the proposed restriction for Euro 5 Diesel vehicles to continue to be licenced to 10 years is for the licensing authority is in line with the Councils vision is to make Kirklees completely carbon neutral by 2048. The Department for Transports Best Practice Guidance states:

“The setting of an arbitrary age limit may be inappropriate, 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 5-year-old used electric vehicle will produce less emissions than a new euro 6 diesel or petrol 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.

Licensing authorities should not impose age limits for the licensing of vehicles instead they should consider more targeted requirements to meet their policy objectives on emissions, safety rating and increasing wheelchair accessible provision where this is low.”

#### Question 5

Do you agree that all wheelchair accessible vehicles should cease to be licensed at 16 years old?

	Percentage	Number
Agree	63%	230
Disagree	27%	98
Don't know	11%	40

Officer Recommendation and Reasons: -

As wheelchair accessible provision within Kirklees is low and the cost of wheelchair accessible vehicles is high it is recommended that members agree to the increase in the upper age limit of wheelchair accessible vehicles.

The Best Practice Guidance states:

“Licensing authorities should not impose age limits for the licensing of vehicles instead they should consider more targeted requirements to meet their policy objectives on emissions, safety rating and increasing wheelchair accessible provision where this is low.”

#### Question 6

Do you agree that all Ultra-low emission vehicles should cease to be licensed at 16 years old from date of first registration?

	Percentage	Number
Agree	63%	234
Disagree	29%	106
Don't know	8%	31

Officer Recommendation and Reasons: -

It is recommended that members agree to the proposed increase in the age of ultra-low emission vehicles in line with the Council's corporate aim to make Kirklees carbon neutral by 2048.

#### Question 7

Do you agree that vehicles licensed to 16 should be subject to 2 compliance tests per year between years 13 to 16?

	Percentage	Number
Agree	51%	189
Disagree	43%	159
Don't know	6%	21

Officer Recommendation and Reasons: -

It is recommended that members agree to the proposed requirement for vehicles being licensed to 16 being subject to 2 compliance tests per year between years 13 to 16, due to the 'wear and tear' vehicles face as they get older. Licensed vehicles mileage is, as expected, higher than the average personal vehicle. The Best Practice Guidance states:

"An annual test for licensed vehicles of whatever age (including vehicles that are less than 3 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 prone to mechanical defects."

#### Question 8

Do you agree that electric vehicles should cease to be licensed at 20 years old?

	Percentage	Number
Agree	62%	231
Disagree	25%	94
Don' know	12%	45

Officer Recommendation and Reasons: -

It is recommended that members agree to the proposed amendment to the existing policy to allow for fully electric vehicles to continue to be licensed until they reach 20 years of age. Electric vehicles are still more costly than a petrol/diesel engine vehicle, the average life expectancy for batteries within electric vehicles is 20 years,



therefore, to allow the vehicles to continue to be licensed until they are 20 years old is an incentive for vehicle proprietors to pay the more costly price of purchasing the vehicle.

#### Question 9

Do you agree that electric vehicles should be subject to two compliance tests a year between year 13 and 20?

	Percentage	Number
Agree	46%	170
Disagree	45%	166
Don't know	9%	32

Officer Recommendation and Reasons: -

It is recommended that members agree to the proposed requirement for electric vehicles being licensed to 20 being subject to 2 compliance tests per year between years 13 to 20, due to the 'wear and tear' vehicles face as they get older. Licensed vehicles mileage is, as expected, higher than the average personal vehicle.

#### Question 10

Do you agree that there should be no upper age limit for any licensed vehicles?

	Percentage	Number
Agree	51%	188
Disagree	43%	159
Don't know	6%	22

Officer Recommendation and Reasons: -

It is recommended that members do not remove the upper age limit on all vehicles. Members are asked to consider the previous questions regarding imposing age limits and the reasons for these limits being proposed.

#### Question 11

Do you agree that CCTV should be the choice and responsibility of the vehicle owner?

	Percentage	Number
Agree	67%	250
Disagree	30%	110
Don't know	3%	11

Officer Recommendation and Reasons: -

It is recommended that members agree to the proposed change to the policy to include that CCTV not be mandated but that should vehicle proprietors choose to have CCTV in their vehicle, until the work has been completed to establish whether there is the need for a CCTV policy in Kirklees.

The Department for Transport Statutory Standards state:

“All licensing authorities should consult to identify if there are local circumstances which indicate that the installation of CCTV in vehicles would have either a positive or adverse effect on the safety of taxi and private hire vehicle users, including children or vulnerable adults, and taking into account potential privacy issues”.

Consultation was previously carried out following a review of the Council’s Hackney Carriage and Private Hire Licensing Policy and members resolved to instruct officers to undertake further work to establish the need for a CCTV policy within Kirklees and submit a report for consideration at a future meeting of the Licensing and Safety Committee. This is an ongoing piece of work that will be presented at a later date.

### Question 12

Do you agree that windows (other than front windscreen and front passenger windows) should be manufacturers standard tints?

	<b>Percentage</b>	<b>Number</b>
Agree	77%	286
Disagree	18%	65
Don't know	5%	20

Officer Recommendation and Reasons: -

The current policy for window tints in Kirklees for all windows other than the windscreen and front passenger windows is 21% light transmission. When reviewing the policy, the draft best practice guidance suggested that it would be recommending that local authorities allowing manufacturers standard tints, however, the final published guidance, states:

“There is significant cost and inconvenience associated with requiring drivers to replace the standard manufacturer or factory specifications for window glass. Some passengers may feel more comfortable in vehicles that do not have very heavily tinted rear windows but there is a lack of evidence to suggest that these are detrimental to public safety. Balancing these factors, the department considers that licensing authorities should not require the removal of windows rear of the B-pillar if they have a minimum light transmission of 30% or above. This should maintain passenger confidence whilst ensuring a wide range of vehicles may be licensed.

It is recommended that members consider whether to agree to allow standard manufacturer or factory specifications for window glass and go against the guidance issued by the Department for Transport, or whether to maintain the existing policy of 21% light transmission which also goes against the guidance. Alternatively, members may decide to follow the guidance issued by the Department for Transport and increase the light transmission to 30%.

### Question 13

Do you agree that blackout/privacy glass and self-applied material/film should not be permitted on licensed vehicles?

	<b>Percentage</b>	<b>Number</b>
Agree	66%	243

Disagree	27%	99
Don't know	7%	27

Officer Recommendation and Reasons: -

It is recommended that members agree to the proposed amendment to the policy that states blackout/privacy glass and self-applied material/film should not be permitted. The current policy states no tinted film is accepted, and the addition of blackout/privacy glass further strengthens the policy. To purchase a vehicle with heavily manufacturers tints is not the choice of the vehicle proprietor, to have black out/privacy glass installed or to add self-applied material/film is the choice of the vehicle proprietor and would not be necessary addition for a licensed vehicle.

#### Question 14

Do you agree that MPV's (multi-purpose vehicles) and SUV's (Sports Utility Vehicles or 4x4s) should not be licensed?

	Percentage	Number
Agree	57%	211
Disagree	30%	111
Don't know	13%	50

Officer Recommendation and Reasons: -

It is recommended that SUVs continue to remain barred from being licensed, the reason for this is accessibility for passengers is not easy, SUV's are high and can be challenging for people to enter and leave the vehicle.

In relation to MPV's currently the authority does licence MPV's, an example of an MPV is a vehicle that has the standard 4 passenger seats and two additional seats in the rear, boot space. It is recommended that it is this type of MPV specifically that is not acceptable to be licensed as a private hire or hackney carriage licensed vehicle. The reason for this is that the space for passengers is tight as the two additional rear seats are not suitable for fully grown large adults, it is not possible to condition these vehicles to state that only children can use these seats as the licence specifies the number of passengers only, in addition access to these seats is not easy. In addition, if those seats in the boot space are being used, there is no space within the vehicle for bags/luggage or anything else the passenger may wish to transport with them. It is recommended that MPV's that allow for more than passengers that are not those vehicles with the addition of 2 seats in the boot space of the vehicle be considered to be licenced as long as they meet the criteria set out below from the best practice guidance. These vehicles if modified would require an IVA or certificate of conformity prior to being licensed.

The best practice guidance states:

"The design of non-wheelchair accessible vehicles licensed for use as taxis or private hire vehicles can also have a bearing on their accessibility. This guidance advises authorities to adopt the principle of setting down general criteria for vehicles and allowing drivers and operators to demonstrate how their vehicles fulfil them. When setting minimum criteria for newly licensed vehicles, authorities should consider factors which could influence the accessibility of vehicles to disabled passengers, including:

- The ease with which passengers can enter or leave the vehicles, including the height of steps and the positioning of seats.
- The space available for assistance dogs to remain with their owner in the vehicle.
- The space available for folded mobility aids in addition to other items of luggage.
- The comfort and safety with which disabled people can use them.
- Wheelchair accessible vehicles.”

### Question 15

Do you think licensed vehicles should be allowed to tow trailers?

	Percentage	Number
Agree	48%	177
Disagree	37%	137
Don't know	15%	56

Officer Recommendation and Reasons: -

It is recommended that members resolve to agree to bar licensed vehicles from towing trailers. There is no significant reason for a licensed vehicle to need to tow a trailer. A vehicle should have sufficient space to transport bags/luggage.

## **7. Next steps and timelines**

7.1 Members are asked to make a decision in relation to the draft policy following full consideration of all responses to the consultation.

7.2 Members are also asked to consider whether to allow existing vehicles that do not meet the specifications within the draft policy to remain licensed until they reach the upper age limit in accordance with any decisions taken today, in effect to allow them “grandfather rights”.

7.3 If members resolve to adopt the draft policy or adopt the draft policy with amendments, the new policy will come into effect immediately.

7.4 If members resolved to keep the policy as existing this will be effective immediately and there will be no change.

## **8. Contact officer**

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 Group Leader -Licensing  
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## **9. Background Papers and History of Decisions**

[Agenda for Licensing and Safety Committee on Wednesday 19th July 2023, 10.00 am | Kirklees Council](#)

## **10. Appendices**

**Appendix 1 – Current Vehicle Specification Policy**

**Appendix 2 – Draft Vehicle Specification Policy**

**Appendix 3 – Consultation Responses**

**11. Service Director responsible**

Katherine Armitage

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# **Kirklees Council**

## **Vehicle Specification**

Part A – Hackney Carriage Vehicles

Part B – Private Hire Vehicles

Part C – Vehicle Dimensions

## **Vehicle Specification** **Hackney Carriage Vehicles**

**Amended July 2008**

Above the normal requirements for a MOT test, the Authority's Hackney Carriage test examines the following items

### **HACKNEY CARRIAGES**

1.0 Local Authority conditions for licensing.

1.1 The whole of the vehicles paint work must be coloured white (two tone paint work coloured mouldings or insignia will not be permitted).

1.2 The vehicle must have Kirklees Metropolitan Council's official door sign displayed on top panel of the two front doors. The door signs to be of the adhesive type and securely attached to doors. Any sign not securely fitted i.e. placed on magnetic backing or any other temporary measure will be rejected.

- Any tampering or cutting up of the signs will be rejected and new ones required.
- Any signs that become damaged or defaced will require new ones.

1.3 The vehicle must have a roof mounted illuminated taxi sign (minimum width 1 metre) with the exception of London type cabs.

1.4 The vehicle must be fitted with a tariff meter approved by the Authority. The meter must be fitted securely, horizontal, clearly visible to all passengers, in working condition, professionally installed and set to the Authority's current tariff. The tariff card to be clearly displayed on near side window.

1.5 The vehicle must have a fire extinguisher (minimum weight of 0.95 kg and of a dry powder type. The fire extinguisher to be replaced after three years or carry a twelve monthly service label to indicate extinguisher is still serviceable. The fire extinguisher may be securely fixed within the driver's compartment or rear boot area; it may also be stowed in the glove box but must be clearly marked.

1.6 All Hackney carriage vehicles must have a seat belt that meets British safety standards fitted to each seat.



## INTERIOR

- 2.1 All controls must be in a serviceable and working order (drivers pedals, all switches and controls etc).
- 2.2 No left-hand drive vehicles to be authorised.
- 2.3 The vehicles interior condition must be clean and free from damage.
- 2.4 All seat belts must be secure and operational, of a lap and diagonal type fitted to all Hackney carriage vehicles. With the exception of a lap belt only fitted to middle rear seat of a saloon type vehicle.
- 2.5 All windows, sun-roofs, locks and handles must be secure and operational.
- 2.6 Interior lights and instrument lights must be operational.
- 2.7 Where automatic boot and fuel locks are fitted they must be operational.
- 2.8 The vehicles heating and ventilation systems must be operational (including heated windows.
- 2.9 Where electric mirrors are fitted they must be operational.
- 2.10 The vehicle must carry a legal spare wheel and tyre and a means for changing a wheel.
- 2.11 MPV's must be fitted with a limpet " FOR HIRE" sign to the bottom front near side windscreen, clearly visible from the outside of the vehicle when applying for hire.
- 2.12 Seating capacity to be no more than six passengers (max).
- 2.13 Where short wave radios are fitted they must be securely attached to the vehicle in a position which does not interfere with all driving controls (all foot controls, steering, etc)of that vehicle. The wiring must also be installed to a professional standard and should not interfere with the same driving controls

## EXTERIOR

- 3.1 All fitted lights must be clean and in working order.
- 3.2 All windows must have full visibility and free of stickers etc (other than the legal requirements of a tax disc and licence disc). With the exception of a company name/logo to the front screen visor.
- 3.3 Tinted or smoked glass will be assessed on an individual basis as the level of tint may vary from vehicle to vehicle the limits are front and rear windscreen 75% visible light transmission(VLT) and all side windows 70% VLT. These limits only apply to new applications after 01 January

2007, any existing taxi is exempt these limits. Testers should write on the pass certificate the relevant levels of tint for future reference. No adhesive films allowed. No adhesive films allowed, only tints built into the glass are acceptable. And no mirrored tints of any description.

- 3.4 When fitted rear wash wipe and headlight wash wiper systems must be operational.
- 3.5 All body fitments must be in place, secure and free from damage.
- 3.6 Vehicles must have a matching set of wheel trims fitted (with the exception of alloy or chrome wheels).
- 3.7 All road tyres must be of the same size and speed rating
- 3.8 Tyre side wall repairs will not be acceptable.
- 3.9 Wiring of meter equipment/radios must be of a professional standard (correct cable, fastenings and inline fuses to be fitted).
- 3.10 Engine and gearbox mountings must be secure and of a serviceable condition, gearbox and gear change mechanism must be in good working order.
- 3.11 Paint work must be to manufactures standards (no blemishes, blistering, discolouration, runs, no visible rust spots and have a polished finish).
- 3.12 The legal VIN (Vehicle Identification Number) plate and chassis plate must be fitted in a legible state.
- 3.13 Vehicle must display the Authorities licence plate which when viewed from the rear is clearly visible. The plate to be permanently attached to the vehicle.
- 3.14 The suspension must not be modified or lowered in any way that could adversely affect the handling, ride comfort or safety of the vehicle.
- 3.15 The fitting of bull bar type attachments is strictly prohibited
- 3.16 No jeep type vehicles to be allowed.
- 3.17 With the introduction of multi- purpose vehicles are capable of carrying more than four passengers, the acceptance criteria may vary from vehicle to vehicle depending on luggage space, seating layout and measurements. Each vehicle will be assessed individually for acceptance to carry adult passengers.

#### MPV

- 4.1 With the introduction of multi- purpose vehicles are capable of carrying more than four passengers, the acceptance criteria may vary from vehicle to vehicle depending on luggage

space, seating layout and measurements. Each vehicle will be assessed individually for acceptance to carry adult passengers

- 4.2 With the introduction of multi- purpose vehicles are capable of carrying more than four passengers, the acceptance criteria may vary from vehicle to vehicle depending on luggage space, seating layout and measurements. Each vehicle will be assessed individually for acceptance to carry adult passengers.
- 4.3 Above the annual test vehicles can be subject to 3 checks per year for safety and condition when required.
- 4.4 The London Cab on some models is equipped with a vinyl roof which will be accepted.
- 4.5 All accident damage must be repaired before test/checks can be carried out.

#### ADDITIONAL

- 5.1 Above the annual test vehicles can be subject to 3 checks per year for safety and condition when required.
- 5.2 The London Cab on some models is equipped with a vinyl roof which will be accepted.
- 5.3 All accident damage must be repaired before test/checks can be carried out.
- 5.4 Where a vehicle is presented for a test for the first time, i.e. new application or a change of vehicle class, the test may be carried out without side door signs, roof lights, meter, a limpet for hire sign and fire extinguisher although a pass certificate will not be issued until all the appropriate items above have been fitted and check.

**Amended July 2008**

**TRANSPORT SERVICES**  
**GUIDELINES FOR PRIVATE HIRE OPERATORS/ PROPRIETORS**

**Amended July 2008**

Above the normal requirements for an MOT test the Authority's Private Hire Test examines the following items.

**PRIVATE HIRE**

- 1.1. The vehicle must not resemble a Hackney Carriage.
- 1.2. The vehicle must have Kirklees Metropolitan Council's official door sign displayed on the top panel of the two front doors. The door signs to be of the adhesive type and securely attached to the doors. Any sign not securely fitted i.e. placed on magnetic backing or any other temporary measure will be rejected.
- 1.3. Space is provided on the door sign to display information which the user may require i.e. company name and telephone number. Any tampering or cutting up of the signs will be rejected and new ones required.
  - Any tampering or cutting up of the signs will be rejected and new ones required.
  - Any signs that become damaged or defaced will require new ones
- 1.4. The vehicle may be fitted with a meter (the meter must be fitted securely and will be checked to the owner's tariff, which will be displayed). The meter will be tested at annual test.
- 1.5. The vehicle must have a fire extinguisher (minimum weight of 0.95 kg and of a dry powder type. The fire extinguisher to be replaced after three years or carry a twelve monthly service label to indicate extinguisher is still serviceable. The fire extinguisher may be securely fixed within the driver's compartment or rear boot area; it may also be stowed in the glove box but must be clearly marked.
- 1.6. All private hire vehicles must have a seat belt that meets British safety standards fitted to each seat.

**INTERIOR**

- 2.1 All controls must be in a serviceable and working order (drivers pedals, all switches and controls etc).
- 2.2 No left-hand drive vehicles to be authorised.

- 2.3 The vehicles interior condition must be clean and free from damage.
- 2.4 All seat belts must be secure and operational, of a lap and diagonal type fitted to all Private Hire vehicles. With the exception of a lap belt only fitted to middle front compartment seat and middle rear seat of a saloon type vehicle.
- 2.5 All windows, sun-roofs, locks and handles must be secure and operational.
- 2.6 Interior lights and instrument lights must be operational
- 2.7 Where automatic boot and fuel locks are fitted they must be operational
- 2.8 The vehicles heating and ventilation systems must be operational (including heated windows.
- 2.9 Where electric mirrors are fitted they must be operational.
- 2.10 The vehicle must carry a legal spare wheel and tyre and a means for changing a wheel.
- 2.11 Seating capacity to be no more than eight passengers (max).
- 2.12 Where short wave radios are fitted they must be securely attached to the vehicle in a position which does not interfere with all driving controls (all foot controls, steering, etc)of that vehicle. The wiring must also be installed to a professional standard and should not interfere with the same driving controls

## EXTERIOR

- 3.1 All fitted lights must be clean and in working order.
- 3.2 All windows must have full visibility and free of stickers etc (other than the legal requirements of a tax disc and licence disc).
- 3.3 Tinted or smoked glass will be assessed on an individual basis as the level of tint may vary from vehicle to vehicle the limits are front and rear windscreen 75% visible light transmission(VLT) and all side windows 70% VLT. These limits only apply to new applications after 01 January 2007, any existing taxi is exempt these limits. Testers should write on the pass certificate the relevant levels of tint for future reference. No adhesive films allowed. No adhesive films allowed, only tints built into the glass are acceptable. And no mirrored tints of any description.
- 3.4 When fitted rear wash wipe and headlight wash wiper systems must be operational.
- 3.5 All body fitments must be in place, secure and free from damage.

- 3.6 Vehicles must have a matching set of wheel trims fitted (with the exception of alloy or chrome wheels).
- 3.7 All road tyres must be of the same size and speed rating
- 3.8 Tyre side wall repairs will not be acceptable.
- 3.9 Wiring of meter equipment/radios must be of a professional standard (correct cable, fastenings and inline fuses to be fitted).
- 3.10 Engine and gearbox mountings must be secure and of a serviceable condition, gearbox and gear change mechanism must be in good working order.
- 3.11 Paint work must be to manufactures standards (no blemishes, blistering, discolouration, runs, no visible rust spots and have a polished finish).
- 3.12 The legal VIN (Vehicle Identification Number) plate and chassis plate must be fitted in a legible state.
- 3.13 Vehicle must display the Authorities licence plate which when viewed from the rear is clearly visible. The plate to be permanently attached to the vehicle.
- 3.14 The suspension must not be modified or lowered in any way that could adversely affect the handling, ride comfort or safety of the vehicle.
- 3.15 The fitting of bull bar type attachments is strictly prohibited
- 3.16 No jeep type vehicles allowed

#### TRAILERS

- 4.2 Trailers must be of an all metal construction with a secure lockable hardtop cover.
- 4.3 Trailer weight not to exceed 750kg gross vehicle weight.
- 4.4 Must have all relevant lights fitted and working.
- 4.5 Trailer must be licensed to one specific vehicle only (no multi vehicle use allowed).
- 4.6 Trailer to be tested annually with relevant vehicle.
- 4.7 Towing vehicle must have two side entry doors for ease of escape in the event of an emergency.

4.8 National speed limits apply when towing trailer.

4.9 Trailers to be used by MPV type vehicles only.

#### MPV

5.1 Trailers to be used by MPV type vehicles only.

5.2 With the introduction of multi- purpose vehicles are capable of carrying more than four passengers, the acceptance criteria may vary from vehicle to vehicle depending on luggage space, seating layout and measurements. Each vehicle will be assessed individually for acceptance to carry adult passengers.

#### ADDITIONAL

6.1 Trailers to be used by MPV type vehicles only.

6.2 Above the annual test vehicles can be subject to 3 checks per year for safety and condition when required.

6.3 All accident damage must be repaired before test/checks can be carried out.

6.4 Where a vehicle is presented for a test for the first time, i.e. new application or a change of vehicle class, the test may be carried out without side door signs, roof lights, meter, a limpet for hire sign and fire extinguisher although a pass certificate will not be issued until all the appropriate items above have been fitted and check.

**Amended July 2008**

## Hackney Carriage and Private Hire Vehicle Dimensions

### Saloon Type Cars

- A. The width of the rear part of the body, measured six inches below the top and six inches in front of the rear back seat shall not be less than 52 inches. The measurement made with the doors closed.
- B. The rear seat shall not be less in width than the full interior width of the vehicle, provided that wheel covers forming permanent arm rests may reduce the seat length to 48 inches.
- C. The front seat shall not be less than 18 inches in width.
- D. The front and rear door entry width measured from the inside of the door seal aperture shall not be less than 24 inches.
- E. Rear seat head room shall not be less than 33 inches.
- F. The depth of any fixed seat shall not be less than 18 inches
- G. The distance between the front and rear seats shall be a minimum distance of 6 inches with the front seat fully retracted with the seat back in a normal driving position.
- H. Minimum height from ground 5.75 inches to main structure of vehicle, i.e height ground to undersill (structural member) or sub frame/front box section.  
Sufficient clear and clean internal luggage capacity for maximum number of passengers.

### Vans, Minibuses and MPV's

- A. Internal floor to roof height 52 inches
- B. Seat bases 16.5 x 16.5 inches
- C. Wheelchair access door height 46 inches
- D. Wheelchair access door width 27 inches
- E. Wheelchair floor space and method of securing to comply with all relevant legislation
- F. Luggage space compatible with seating capacity
- G. Taxi hire sign to be mounted at the centre of the roof in the front position (as with a London cab)
- H. A fire extinguisher to be a minimum 1kg accessible from driver's seat
- I. Seat base to roof height 33 inches



The above are the current dimensions which we use but due to changing vehicle types may be reviewed and change periodically.



# **Kirklees Council Vehicle Specification**

Part A – Hackney Carriage Vehicles

Part B – Private Hire Vehicles

Part C – Vehicle Dimensions

## Vehicle Specification Hackney Carriage Vehicles

### Amended July 2008

Above the normal requirements for a MOT test, the Authority's Hackney Carriage test examines the following items

#### HACKNEY CARRIAGES

1.7 Local Authority conditions for licensing.

1.8 The whole of the vehicles paint work must be coloured white (two tone paint work, coloured mouldings or insignia will not be permitted).

1.9 For Hackney carriage vehicles to be considered for first licensing, they must meet the following emissions criteria:

Petrol engines – Must meet Euro 5 standards

Diesel engines – Must meet Euro 6 standards

The authority recognizes the need for additional wheelchair accessible vehicles (WAV's) within the licensed trade. New licensed WAV's powered by a diesel engine will be allowed to meet the lower euro 5 diesel standards and not euro 6 standards.

1.10 The vehicle must have Kirklees ~~Metropolitan~~ Council's official door sign displayed on top panel of the two front doors. The official door signs for Hackney Carriage vehicles are produced in house by the licensing service, unless otherwise agreed. The door signs to be of the adhesive type and securely attached to doors. Any sign not securely fitted i.e. placed on magnetic backing or any other temporary measure ~~will be rejected~~ may result in the failure of the compliance test or suspension of the vehicle licence. It is however accepted that some Hackney Carriage drivers also obtain work through private hire operators. Should this be the case, then a logo displaying the name of the private hire operator can be fixed to the vehicle via a magnetic backing. This logo will be provided by the driver and not the licensing service. Any tampering or cutting up of the signs ~~will be rejected~~ may result in the failure of the compliance test or the suspension of the vehicle licence and new ones required. Any signs that become damaged or defaced will require new ones.

1.11 The vehicle must have a roof mounted illuminated taxi sign (~~minimum width 1 metre~~) with the exception of London type cabs. The roof sign must be clearly visible from both the front and the rear of the vehicle.

1.12 The vehicle must be fitted with a tariff meter approved by the Authority. The meter must be fitted securely, horizontal, clearly visible to all passengers, in working condition, professionally installed and set to the Authority's current tariff. The tariff card to be clearly displayed on near side window.

- 1.13 The vehicle must have a fire extinguisher (minimum weight of 0.95 kg and of a dry powder type). The fire extinguisher to be replaced after three years or carry a twelve monthly service label to indicate extinguisher is still serviceable. The fire extinguisher may be securely fixed within the driver's compartment or rear boot area; it may also be stowed in the glove box but must be clearly marked.
- 1.14 All Hackney carriage vehicles must have a seat belt that meets British safety standards fitted to each seat.
- 1.15 All diesel-powered Hackney Carriage Euro 5 vehicles, with the exception of Wheelchair Accessible Vehicles (WAV's) will cease to be licensed at 10 years old.
- 1.16 All Hackney Carriage vehicles except for WAV's will cease to be licensed at 13 years old.
- 1.17 All wheelchair accessible Hackney Carriage vehicles will cease to be licensed at 16 years old. Between years 13 to 16, the vehicle will be subject to two compliance checks a year at 6 monthly intervals. Failure to take a vehicle for its 6 monthly test will result in the suspension of the vehicle Licence until it has passed the compliance test.

#### Definition of Wheelchair Accessible Vehicles (WAV's)

*A WAV is a vehicle constructed or converted specifically so that it can accommodate one or more person(s) seated in the wheelchair(s) when travelling on the road.*

- 1.18 All Hackney Carriage Ultra-low emission vehicles (ULEV's) will cease being licensed at 16 years old. Between years 13 to 16, the vehicle will be subject to two compliance checks a year at 6 monthly intervals.

#### Definition of Ultra-Low Emission Vehicles (ULEVs)

*ULEVs are currently defined as having less than 75 grams of CO2 per kilometer (g/km) from the tail pipe. The CO2 count can be ascertained using the following website - <https://www.gov.uk/get-vehicle-information-from-dvla>*

- 1.19 The authority recognises the national and industry wide push for the greater use of environmentally friendly all electric vehicles. This is especially so given that new vehicles fitted with internal combustion engines are due to be banned from sale in the UK from 2030. It is anticipated that within the coming years, all electric vehicles will start to be used within the licensed trade as the charging infrastructure and battery technology improves. Any all-electric Hackney Carriage vehicles used within the licensed trade can remain licensed until 20 years of age, subject to two annual compliance checks from years 13 to 20 at 6 monthly intervals.
- 1.20 There is currently no requirement for CCTV to be installed within Hackney Carriage vehicles. However, the licensing service will allow drivers to install CCTV in their vehicles should they desire. Any installation of CCTV must not interfere with the normal operation of the vehicle and/or visibility out of the vehicle windows. If a driver decides to install CCTV, they must ensure that they are registered with the Information Commissioner's Office and abide by their rules. Further information on this can be found at <https://ico.org.uk>
- 1.21 All licensed Hackney carriage vehicles are tested at the Council's testing stations. Test are conducted at the time of being licensed and upon renewal. The test carried out is a compliance test and not an MOT. Should Licence holders/vehicle proprietors wish to have an MOT at the time

of the compliance test this must be requested prior to the test commencing and will result in an additional charge. Failure to do so will result in the issuing of an MOT certificate not being possible.

- 1.22 48 hours notification of a test cancellation must be given, failure to do so will result in a further payment for a test being charged and no refund will be provided.
- 1.23 Where the Council is not satisfied with the roadworthiness of a Hackney Carriage vehicle, it may request a HPI check at a cost to the licence holder. Should that HPI check reveal that the vehicle is an insurance total loss, then the vehicle may have to undergo an independent inspection and an 'Autolign' report produced at the cost of the licence holder.
- 1.24 Where a Hackney carriage vehicle fails its test and the tester is not satisfied as to the roadworthiness of the vehicle, the vehicle licence may be suspended by an authorised officer of the Council.
- 1.25 Should a Hackney Carriage vehicle licence be suspended, then it cannot lawfully be driven on the public highway without a valid MOT certificate in place.
- 1.26 Any Hackney Carriage vehicle whose licence has been suspended due to accident damage, may have to be taken to the Council's testing stations to be examined. This is to ensure that any repairs have been made satisfactorily and that the vehicle is roadworthy.
- 1.27 The law requires that front vehicle windscreens must permit a minimum of 75% light transmission and front passenger windows 70%. The Council will allow manufacturers standard tints on all other windows, excluding the front vehicle windscreen and the front passenger windows. This must only be the standard level of window tint. Blackout or privacy glass is not permitted. Self-applied material/film is not permitted.
- 1.28 There are three types of Hackney Carriage vehicle licence. These are:
  - A new licence – a licence that is issued when the vehicle is first licensed following an application for a new vehicle licence being submitted.
  - A renewal – a renewal licence is issued annually following an application to renew being submitted.
  - A transfer – A transfer is an application to transfer the vehicle and its current licence to a new proprietor (owner).

## INTERIOR

- 2.14 All controls must be in a serviceable and working order (drivers pedals, all switches and controls etc).
- 2.15 No left-hand drive vehicles to be authorised.
- 2.16 The vehicles interior condition must be clean and free from damage.
- 2.17 All seat belts must be secure and operational, of a lap and diagonal type fitted to all Hackney carriage vehicles. With the exception of a lap belt only fitted to middle rear seat of a saloon type vehicle.
- 2.18 All windows, sun-roofs, locks and handles must be secure and operational.
- 2.19 Interior lights and instrument lights must be operational.
- 2.20 Where automatic boot and fuel locks are fitted they must be operational.
- 2.21 The vehicles heating and ventilation systems must be operational (including heated windows).
- 2.22 Where electric mirrors are fitted they must be operational.
- 2.23 Seating capacity to be no more than six passengers (maximum).
- ~~2.24 The vehicle must carry a legal spare wheel and tyre and a means for changing a wheel.~~
- ~~2.25 MPV's must be fitted with a limpet "FOR HIRE" sign to the bottom front near side windscreen, clearly visible from the outside of the vehicle when applying for hire.~~
- ~~2.26 Where short wave radios are fitted they must be securely attached to the vehicle in a position which does not interfere with all driving controls (all foot controls, steering, etc) of that vehicle. The wiring must also be installed to a professional standard and should not interfere with the same driving controls~~

## EXTERIOR

- 3.18 All fitted lights must be clean and in working order.
- 3.19 All windows must have full visibility and free of stickers etc (other than the legal requirements of a ~~tax disc and~~ licence disc). With the exception of a company name/logo to the front screen visor.
- ~~3.20 Tinted or smoked glass will be assessed on an individual basis as the level of tint may vary from vehicle to vehicle the limits are front and rear windscreen 75% visible light transmission (VLT) and all side windows 70% VLT. These limits only apply to new applications after 01 January~~

~~2007, any existing taxi is exempt these limits. Testers should write on the pass certificate the relevant levels of tint for future reference. No adhesive films allowed. No adhesive films allowed, only tints built into the glass are acceptable. And no mirrored tints of any description.~~

- 3.21 When fitted rear wash wipe and headlight wash wiper systems must be operational.
- 3.22 All body fitments must be in place, secure and free from damage.
- 3.23 Vehicles must have a matching set of wheel trims fitted (with the exception of alloy or chrome wheels).
- 3.24 All road tyres must be of the same size and speed rating
- 3.25 Tyre side wall repairs will not be acceptable.
- 3.26 Wiring of meter equipment/radios must be of a professional standard (correct cable, fastenings and inline fuses to be fitted).
- 3.27 Engine and gearbox mountings must be secure and of a serviceable condition, gearbox and gear change mechanism must be in good working order.
- 3.28 Paint work must be to manufactures standards (no blemishes, blistering, discolouration, runs, no visible rust spots and have a polished finish).
- 3.29 The legal VIN (Vehicle Identification Number) plate and chassis plate must be fitted in a legible state.
- 3.30 Vehicle must display the Authorities licence plate which when viewed from the rear is clearly visible. The plate to be permanently attached to the vehicle.
- 3.31 The suspension must not be modified or lowered in any way that could adversely affect the handling, ride comfort or safety of the vehicle.
- 3.32 The fitting of bull bar type attachments is strictly prohibited.
- 3.33 MPV's (Mulit purpose vehicles) are not acceptable and will not be licensed, any existing MPV's will be permitted to remain licensed to their upper age limit.
- 3.34 SUV's (Sports Utility Vehicles or 4x4's) will not be licensed.
- ~~3.35 No jeep type vehicles to be allowed.~~
- ~~3.36 With the introduction of multi purpose vehicles are capable of carrying more than four passengers, the acceptance criteria may vary from vehicle to vehicle depending on luggage space, seating layout and measurements. Each vehicle will be assessed individually for acceptance to carry adult passengers.~~

#### MPV

- ~~4.6 With the introduction of multi purpose vehicles are capable of carrying more than four passengers, the acceptance criteria may vary from vehicle to vehicle depending on luggage~~



~~space, seating layout and measurements. Each vehicle will be assessed individually for acceptance to carry adult passengers~~

~~4.7 With the introduction of multi-purpose vehicles are capable of carrying more than four passengers, the acceptance criteria may vary from vehicle to vehicle depending on luggage space, seating layout and measurements. Each vehicle will be assessed individually for acceptance to carry adult passengers.~~

4.8 Above the annual test vehicles can be subject to 3 checks per year for safety and condition when required.

4.9 The London Cab on some models is equipped with a vinyl roof which will be accepted.

4.10 All accident damage must be repaired before test/checks can be carried out.

#### ADDITIONAL

~~5.5 Above the annual test vehicles can be subject to 3 checks per year for safety and condition when required.~~

~~5.6 The London Cab on some models is equipped with a vinyl roof which will be accepted.~~

~~5.7 All accident damage must be repaired before test/checks can be carried out.~~

5.8 Where a vehicle is presented for a test for the first time, i.e. new application or a change of vehicle class, the test may be carried out without side door signs, roof lights, meter, ~~a limpet for hire sign~~ and fire extinguisher although a pass certificate will not be issued until all the appropriate items above have been fitted and check.

**Amended July 2008**

# TRANSPORT SERVICES

## GUIDELINES FOR PRIVATE HIRE OPERATORS/ PROPRIETORS

Amended July 2008

Above the normal requirements for an MOT test the Authority's Private Hire Test examines the following items.

### PRIVATE HIRE

1.7. The vehicle must not resemble a Hackney Carriage.

1.8. The licensing service understands the importance that members of the public can differentiate between Hackney Carriage Vehicles and Private Hire vehicles. Within Kirklees all Hackney Carriage vehicles are white in colour and display a 'taxi' roof sign. No 'new' vehicle licences will be issued to Private Hire vehicles that are white in colour. Any existing Private Hire vehicles that are white in colour will be allowed to remain licensed and renewed until they reach the upper age limit of a licensed Private Hire vehicle.

1.9. The vehicle must have Kirklees ~~Metropolitan~~ Council's official door sign displayed on the top panel of the two front doors. ~~The official door signs for Private Hire vehicles are produced in house by the licensing service, unless otherwise agreed.~~ The door signs to be of the adhesive type and securely attached to the doors. Any sign not securely fitted i.e. placed on magnetic backing or any other temporary measure ~~will be rejected~~ may result in the failure of the compliance test or suspension of the vehicle licence. Any tampering or cutting up of the signs ~~will be rejected~~ may result in the failure of the compliance test or the suspension of the vehicle licence and new ones required. Any signs that become damaged or defaced will require new ones. It is acknowledged however, that many Private Hire drivers obtain work through more than one Private Hire Operator. The licensing service will allow drivers to utilise the logo of the Private Hire Operator for whom they are working through at the time and attach it to the vehicle via a magnetic backing. The word 'taxi' is not permitted to be used on the logo. The logo will be provided by the driver and not the licensing service.

~~1.10. Space is provided on the door sign to display information which the user may require i.e. company name and telephone number. Any tampering or cutting up of the signs will be rejected and new ones required.~~

- ~~• Any tampering or cutting up of the signs will be rejected and new ones required.~~
- ~~• Any signs that become damaged or defaced will require new ones~~

~~1.11. The vehicle may be fitted with a meter (the meter must be fitted securely and will be checked to the owner's tariff, which will be displayed). The meter will be tested at annual test.~~

1.12. The vehicle must have a fire extinguisher (minimum weight of 0.95 kg and of a dry powder type. The fire extinguisher to be replaced after three years or carry a twelve monthly service label to indicate extinguisher is still serviceable. The fire extinguisher may be securely fixed

within the driver's compartment or rear boot area; it may also be stowed in the glove box but must be clearly marked.

1.13. All private hire vehicles must have a seat belt that meets British safety standards fitted to each seat.

1.14. For Private Hire vehicles to be considered for first licensing, they must meet the following emissions criteria:

Petrol engines – Must meet Euro 5 standards.

Diesel engines – Must meet Euro 6 standards.

The authority recognizes the need for additional wheelchair accessible vehicles (WAV's) within the licensed trade. New licensed WAV's powered by a diesel engine will be allowed to meet the lower Euro 5 diesel standards and not Euro 6 standards.

#### Definition of Wheelchair Accessible Vehicles

*A WAV is a vehicle constructed or converted specifically so that it can accommodate one or more person(s) seated in the wheelchair(s) when travelling on the road.*

1.9 All diesel powered Private Hire Euro 5 vehicles, with the exception of WAV's will cease to be licensed at 10 years old.

1.10 All Private Hire vehicles except for WAV's will cease to be licensed at 13 years old.

1.11 All wheelchair accessible private Hire vehicles will cease to be licensed at 16 years old. Between years 13 to 16, the vehicle will be subject to two compliance checks a year at 6 monthly intervals.

1.12 All Private Hire Ultra Low Emission vehicles (ULEV's) will cease to be licensed at 16 years old. Between years 13 to 16, the vehicle will be subject to two compliance checks a year at 6 monthly intervals.

#### Definition of Ultra-Low Emission Vehicles (ULEVs)

*ULEVs are currently defined as having less than 75 grams of CO<sub>2</sub> per kilometer (g/km) from the tail pipe. The CO<sub>2</sub> count can be ascertained using the following website - <https://www.gov.uk/get-vehicle-information-from-dvla>*

1.13 The authority recognises the national and industry wide push for the greater use of environmentally friendly all electric vehicles. This is especially so given that new vehicles fitted with internal combustion engines are to be banned from sale in the UK from 2030. It is anticipated that within the coming years, all electric vehicles will start to be used within the licensed trade as the charging infrastructure and battery technology improves. Any all-electric Private Hire vehicles used within the licensed trade can remain licensed until 20 years of age, subject to two annual compliance checks from years 13 to 20 at 6 monthly intervals.

1.14 There is currently no requirement for CCTV to be installed in private Hire vehicles. However, the licensing service will allow drivers to install CCTV in their vehicles should they desire. Any installation of CCTV must not interfere with the normal operation of the vehicle and/or visibility out

of the vehicle windows If a driver decides to install CCTV, they must ensure they are registered with the Information Commissioner's Office and abide by their rules. Further information can be found at <https://ico.org.uk>.

1.15 All licensed Private Hire vehicles are tested at the Council's testing stations. Tests are conducted at the time of being licensed and upon renewal. The test carried out is a compliance test and not an MOT. Should Licence holders/vehicle proprietors wish to have an MOT at the time of the compliance test this must be requested prior to the test commencing and will result in an additional charge. Failure to do so will result in the issuing of an MOT certificate not being possible.

1.16 48 hours notification of a test cancellation must be given, failure to do so may result in a further payment for a test being charged.

1.17 Where the Council is not satisfied with the roadworthiness of a Private Hire vehicle, it may request a HPI check at a cost to the licence holder. Should that HPI check reveal that the vehicle is an insurance total loss, then the vehicle may have to undergo an independent inspection and an 'Autolign' report produced at the cost of the licence holder.

1.18 Where a Private Hire vehicle fails its test and the tester is not satisfied as to the roadworthiness of the vehicle, the vehicle licence may be suspended by an authorised officer of the Council.

1.19 Should a Private Hire vehicle licence be suspended, then it cannot lawfully be driven on the public highway without a valid MOT certificate in place.

1.20 Any Private Hire vehicle whose licence has been suspended due to accident damage, may have to be taken to the Council's testing stations to be examined. This is to ensure any repairs have been made satisfactorily and that the vehicle is roadworthy.

1.21 The law requires that front vehicle windscreens must permit a minimum of 75% light transmission and front passenger windows 70%. The Council will allow manufacturers standard tints on all other windows, excluding the front vehicle windscreen and the front passenger windows. This must only be of the standard level of window tint/ Blackout or privacy glass is not permitted. Self-applied material/film is not permitted.

1.22 There are three types of Private Hire vehicle licence, these are:

- A new licence – a licence that is issued when the vehicle is first licensed following an application for a new vehicle licence being submitted.
- A renewal – a renewal licence is issued annually following an application to renew being submitted.
- A transfer – A transfer is an application to transfer the vehicle and its current licence to a new proprietor (owner).

- 2.13 All controls must be in a serviceable and working order (drivers pedals, all switches and controls etc).
- 2.14 No left-hand drive vehicles to be authorised.
- 2.15 The vehicles interior condition must be clean and free from damage.
- 2.16 All seat belts must be secure and operational, of a lap and diagonal type fitted to all Private Hire vehicles. With the exception of a lap belt only fitted to middle front compartment seat and middle rear seat of a saloon type vehicle.
- 2.17 All windows, sun-roofs, locks and handles must be secure and operational.
- 2.18 Interior lights and instrument lights must be operational
- 2.19 Where automatic boot and fuel locks are fitted they must be operational
- 2.20 The vehicles heating and ventilation systems must be operational (including heated windows.
- 2.21 Where electric mirrors are fitted they must be operational.
- ~~2.22 The vehicle must carry a legal spare wheel and tyre and a means for changing a wheel.~~
- 2.23 Seating capacity to be no more than eight passengers (maximum).
- 2.24 Where short wave radios are fitted they must be securely attached to the vehicle in a position which does not interfere with all driving controls (all foot controls, steering, etc)of that vehicle. The wiring must also be installed to a professional standard and should not interfere with the same driving controls.

## EXTERIOR

- 3.17 All fitted lights must be clean and in working order.
- 3.18 All windows must have full visibility and free of stickers ~~etc~~ other than the ~~legal requirements of a tax disc and~~ licence disc.
- ~~3.19 Tinted or smoked glass will be assessed on an individual basis as the level of tint may vary from vehicle to vehicle the limits are front and rear windscreen 75% visible light transmission (VLT) and all side windows 70% VLT. These limits only apply to new applications after 01 January 2007, any existing taxi is exempt these limits. Testers should write on the pass certificate the relevant levels of tint for future reference. No adhesive films allowed. No adhesive films allowed, only tints built into the glass are acceptable. And no mirrored tints of any description.~~
- 3.20 When fitted rear wash wipe and headlight wash wiper systems must be operational.
- 3.21 All body fitments must be in place, secure and free from damage.
- 3.22 Vehicles must have a matching set of wheel trims fitted (with the exception of alloy or

chrome wheels).

- 3.23 All road tyres must be of the same size and speed rating
- 3.24 Tyre side wall repairs will not be acceptable.
- 3.25 Wiring of meter equipment/radios must be of a professional standard (correct cable, fastenings and inline fuses to be fitted).
- 3.26 Engine and gearbox mountings must be secure and of a serviceable condition, gearbox and gear change mechanism must be in good working order.
- 3.27 Paint work must be to manufactures standards (no blemishes, blistering, discolouration, runs, no visible rust spots and have a polished finish).
- 3.28 The legal VIN (Vehicle Identification Number) plate and chassis plate must be fitted in a legible state.
- 3.29 Vehicle must display the Authorities licence plate which when viewed from the rear is clearly visible. The plate to be permanently attached to the vehicle.
- 3.30 The suspension must not be modified or lowered in any way that could adversely affect the handling, ride comfort or safety of the vehicle.
- 3.31 The fitting of bull bar type attachments is strictly prohibited.
- 3.32 MPV's (Mulit purpose vehicles) will not be licensed, any existing MPV's will be permitted to remain licensed to their upper age limit.
- 3.33 SUV's (Sports Utility Vehicles or 4x4's) will not be licensed.

~~3.34 No jeep type vehicles~~

#### allowed TRAILERS

~~4.10 Trailers must be of an all metal construction with a secure lockable hardtop cover.~~

~~4.11 Trailer weight not to exceed 750kg gross vehicle weight.~~

~~4.12 Must have all relevant lights fitted and working.~~

~~4.13 Trailer must be licensed to one specific vehicle only (no multi vehicle use allowed).~~

~~4.14 Trailer to be tested annually with relevant vehicle.~~

~~4.15 Towing vehicle must have two side entry doors for ease of escape in the event of an emergency.~~

~~4.16 National speed limits apply when towing trailer.~~

~~4.17 Trailers to be used by MPV type vehicles only.~~

MPV

~~5.3 Trailers to be used by MPV type vehicles only.~~

~~5.4 With the introduction of multi-purpose vehicles are capable of carrying more than four passengers, the acceptance criteria may vary from vehicle to vehicle depending on luggage space, seating layout and measurements. Each vehicle will be assessed individually for acceptance to carry adult passengers.~~

ADDITIONAL

~~6.5 Trailers to be used by MPV type vehicles only.~~

6.6 Above the annual test vehicles can be subject to 3 checks per year for safety and condition when required.

6.7 All accident damage must be repaired before test/checks can be carried out.

~~6.8 Where a vehicle is presented for a test for the first time, i.e. new application or a change of vehicle class, the test may be carried out without side door signs, roof lights, meter, a limpet for hire sign and fire extinguisher although a pass certificate will not be issued until all the appropriate items above have been fitted and check.~~

**Amended July 2008**

## Hackney Carriage and Private Hire Vehicle Dimensions

### Saloon Type Cars

- I. The width of the rear part of the body, measured six inches below the top and six inches in front of the rear back seat shall not be less than 52 inches. The measurement made with the doors closed.
- J. The rear seat shall not be less in width than the full interior width of the vehicle, provided that wheel covers forming permanent arm rests may reduce the seat length to 48 inches.
- K. The front seat shall not be less than 18 inches in width.
- L. The front and rear door entry width measured from the inside of the door seal aperture shall not be less than 24 inches.
- M. Rear seat head room shall not be less than 33 inches.
- N. The depth of any fixed seat shall not be less than 18 inches
- O. The distance between the front and rear seats shall be a minimum distance of 6 inches with the front seat fully retracted with the seat back in a normal driving position.
- P. Minimum height from ground 5.75 inches to main structure of vehicle, i.e height ground to undersill (structural member) or sub frame/front box section.  
Sufficient clear and clean internal luggage capacity for maximum number of passengers.

### Vans, Minibuses and MPV's

- J. Internal floor to roof height 52 inches
- K. Seat bases 16.5 x 16.5 inches
- L. Wheelchair access door height 46 inches
- M. Wheelchair access door width 27 inches
- N. Wheelchair floor space and method of securing to comply with all relevant legislation
- O. Luggage space compatible with seating capacity
- P. Taxi hire sign to be mounted at the centre of the roof in the front position (as with a London cab)
- Q. A fire extinguisher to be a minimum 1kg accessible from driver's seat
- R. Seat base to roof height 33 inches



The above are the current dimensions which we use but due to changing vehicle types may be reviewed and change periodically.

**All comments from Survey and Council's Response****Question 1**

**Do you agree that hackney carriage vehicles should be white and private hire vehicles can be any colour other than white?**

	<b>Percentage</b>	<b>Number</b>
Agree	65%	240
Disagree	30%	111
Don't know	5%	20

<b>Comments</b>	<b>Council Response</b>
At this time an age it's hard to find specific colour and to get a vehicle resprayed white costs thousands and devalues the vehicle	Comment noted
Hackney carriage should be any colour it has a taxi sign on roof so it's clearly visible	Comment noted
Private hire can be any colour	Comment noted
Private hire should be any colour including white	Comment noted
A white coloured car should be allowed to be a PHV as it is easy to distinguish between a HCV and and PHV.	Comment noted
They can be any colour	Comment noted
I do believe that taxis being a public service for GAIN should be of uniform standard which includes the colour WHITE	Comment noted
Should be multicoloured	Comment noted
For years in kirklees hc are white in colour and council livery applied to these vehicles, phv are totally different & different livery altogether I don't see why phv can't be in white colour.	Comment noted
Private hire should be any colour	Comment noted

<p>It's unfair to discriminate against private hire drivers who wish to buy or use white colour cars for taxis.</p> <p>At the end of the day the drivers are buying the cars and alot of drivers prefer white because they are seen better at night and dark evenings.</p>	Comment noted
<p>There needs to be a clear visible difference between hackney carriage and private hire. Personally I think white should not be allowed as private hire and only hackney carriage as some customers mistake white private hire vehicles for hackney carriages.</p> <p>White - hackney carriage only Any colour excluding white - private hire Of course this will take a few year's to complete as there are many White private hire vehicles already licensed but if you start this rule now and don't allow new one's that are white for private hire use then slowly within a few years the current ones will end and no new ones will be entered.</p>	Comment noted
<p>I think any colour for both Hackney and private hire vehicles. It doesn't make a difference.</p>	Comment noted
<p>Providing a service is the key</p>	Comment noted
<p>No</p>	Comment noted
<p>Hackney should be always white however private hire could also be white, it seems a bit of a stretch to prevent a white car from becoming a private hire. Signage on the roof of both types of vehicles could overcome this quite simply.</p>	Comment noted
<p>private hire should be more distinctive</p>	Comment noted
<p>If the public can't tell the difference between a hackney and a saloon hatchback or estate car then that is where your issue lies.</p>	Comment noted
<p>PH should be any colour including white as there is a clear difference between HC with the roof signs anyway</p>	Comment noted
<p>Will make it easier to distinguish between hackney carriages and private hire vehicles.</p>	Comment noted
<p>Cost of white cars seem to be higher colour of the car should not determine whether it is private hire or Hackney carriage. Hackney carriage also work with private hire firms.</p>	Comment noted
<p>allowing private hire to be white vehicles will only cause confusion</p>	Comment noted

Pick a standard colour for private hire vehicles. Hackneys OK white.	Comment noted
Easy to spot, nice presentable fleet	Comment noted
What difference does colour make.	Comment noted
Personally I think all Hackney carriage vehicles should be white its a standard vehicle manufactures colour	Comment noted
Not sure if it will be of any benefit	Comment noted
A Taxi sign on roof that's enough to recognise.I will say there should be West Yorkshire taxi similar to North Yorkshire	Comment noted
I am not really concerned about the colour of the taxi	Comment noted
You can't find a particular colour vehicle when looking FP	Comment noted
Just why? Never been a problem in the past, big massive sign on top, who uses Hackney any more anyway. Thier demand is falling, we're not in the 80's where you will get out of a club and get into a Hackney, now customers tap on phone and Private Hire is out for them in secs. Even more convenient than a Hackney.	Comment noted
Because both paid the same fee . Rules are same for both	Comment noted
What difference does the colour make	Comment noted
Colour is irrelevant	Comment noted
Hackney only white Private hire any colour excluding white	Comment noted
They should all be a bright colour and the SAME colour	Comment noted
So customers can distinguish both types of vehicles	Comment noted
Colour doesn't matter as long as they are safe and legal.	Comment noted
The colour is irrelevant but it should be distinguishable from vehicle to vehicle which are licensed and which are not	Comment noted
Having all the same colour would identify if they are a genuine taxi along with their licensing plate. And would help passengers identify them when out and about including people with poor vision.	Comment noted
Hackney carriage vehicle should be any colour	Comment noted
Doent matter on the colour whatbdoes matter is the correct licencing plate from the council thatbit is serving in woth all the correct details displayed for the user	Comment noted
Colour isnt important but clear signage and licensing information must be	Comment noted

They cost so much, this is why o don't or make sure I don't get in one as it coz so much	Comment noted
It doesn't matter as long as they are clearly marked	Comment noted
Doesn't make any difference what colour they are!	Comment noted
Think all taxis shoukd be one colour and display on top when they are available to hire (like london)	Comment noted
Makes it easier to understand	Comment noted
I don't necessarily think they should be white but I think they should definitely be a different colour to private hire.	Comment noted
Not sure what the colour of the taxi has to do with anything. what about Black taxis?	Comment noted
All taxis should be white	Comment noted
All Taxis should look like Taxis, ie have Taxi sign on top,I nearly got in a car thinking it was a Taxi till a member of the public pulled me away	Comment noted
Any colour but a badge would help like Manchester	Comment noted
They should be any colour whichever they are	Comment noted
I don't care what colour they are.	Comment noted
Unfair to ask private hire drivers to pay for another car just because of the colour	Comment noted
Private hire any colour even white is ok	Comment noted
As long as a safe, reliable and affordable taxi, dont care what colour or type it is.	Comment noted
All taxis should be properly designed and built (like black cabs) so they are easily identified for safety reasons - too many posing as taxis Standard cars should not be allowed	Comment noted
There have been alot of private hire plates from other councils operating in kirklees for example Wolverhampton which is leading to kirklees licensing losing out on revenue.	Comment noted
There are much bigger issues in Huddersfield right now that what colour taxis are.	Comment noted
Flag down white PH any colour as they have different stickers on... duh	Comment noted

If Hackney carriage vehicles remain white, then private hire vehicle can be any colour apart from white to prevent confusion.	Comment noted
The colour of the car is irrelevant. Just means private hire drivers in cars that are white are out of a job or have to buy a new car. We all know what a white taxi is & we all know when we get a private hire taxi instead as they communicate the registration & vehicle description. I don't see how the colours of the cars matter so long as it's safe to drive	Comment noted
Hackney Too expensive	Comment noted
It would be beneficial for Hackney carriages to be one colour and private hire one colour, to assist in identification.	Comment noted
Whilst we recognise and understand the desire for uniformity, we also see the dangers to the public of such a condition, since the single colour then becomes the norm to recognise a hackney carriage, reducing the council signage impact or focus, thereby creating a risk of a late night passenger simply jumping into a white car, thinking it is a hackney carriage simply because it is the correct colour.	Comment noted
P/hire can be any colour Inc white	Comment noted
Existing policy is ok .private hire could be any colour including white	Comment noted
Private hire should be any colour	Comment noted

## Question 2

Do you agree wheelchair accessible vehicles should be licensed if they are Euro 5 diesel standard?

	Percentage	Number
Agree	75%	277
Disagree	13%	47
Don't know	12%	45

Comments	Council Response
It's very hard to get hold of wav that is adapted for wheel chair and there are plenty of wheel chair users	Comment noted
There is a shortage of WAVs	Comment noted
Safety is paramount	Comment noted
Vehicles in 2023 are very expensive due to covid plus cost of living crisis hitting every one including taxi trade the most, eu5 vehicles will be cheaper to buy to insure and cheaper to repair compared to eu6 in present times	Comment noted
Yes because wavs cost upto 50% more for euro 6 than 5 this is because of all the special equipment needed . Euro 6 wav will cost approximately 15k that's average milleage and a cheap end like Peugeot/Citroen. To get a better make like a VW Caddy etc your looking over 20k. However for a euro 5 wav on the cheap end you can pick them up for around 7/8k which is more or less half	Comment noted
No	Comment noted
Euro 5 vehicles stopped being produced in September 2015 - this is 8yrs ago. I appreciate that you want a 13 year cut off for vehicles but i would suggest this is too old a vehicle and should be reduced to 10yrs	Comment noted
If it has a MOT and passed an emissions test why not. But a don't see what difference a polluting car makes because it can carry wheelchairs.	Comment noted

If it is needed to ensure a good supply WAVs, then it should be allowed.	Comment noted
As long as it is WCA it shouldn't matter	Comment noted
Euro 6	Comment noted
Should be no fee for license & vehicle license because demands is high and also wheel chairs accessible vehicles are pricey & maintenance is high. Also there should not be restrictions to issue the new license for wheelchair vehicles. I will say Operators shouldn't charge their fee and make taxi available easier for disabled people	Comment noted
Any vehicle on the road should be licenced regardless	Comment noted
Yes, these vehicles new (euro 6) can be very expensive. People will not invest if they can't afford. Will affect disable people.	Comment noted
Diesel standard is irrelevant, no ulez nonsense here	Comment noted
ALL vehicles should be licensed, taxed, insured and MOT'd on a yearly basis, the same as everyday vehicles	Comment noted
To encourage more taxis to be wheelchair accessible	Comment noted
should be Euro 6	Comment noted
What's the euro 5 have to do with wheelchair access It's should be across the area. Another form of discretion against someone who drives a less compliant car. This question is based on working class affordability	Comment noted
Is Any help towards cost given to purchase a new one? The wheelchair users deserve and need much more than general public these services	There is no financial aid to assist in the purchasing of vehicles for the licensed trade.
All private hire vehicles must be licenced	Comment noted
Why should a wav vehicle be older and not as safe or held to as high standards as a regular vehicle!	Comment noted
Why would Euro 5 make any difference? All accessible vehicles should be licensed	Comment noted
I also think that if a driver who has an accessible vehicle refuses to carry wheelchair passengers on more than 3 occasions they should be taken off the register and the additional 2 years of vehicle use should be taken away. It's wrong that far too many do this!	This comment does not relate to the question posed, this is a comment regarding driver conduct. Concerns regarding driver conduct can be reported to the licensing service at <a href="mailto:licensing@kirklees.gov.uk">licensing@kirklees.gov.uk</a>



We should be setting standards for the future. There are plenty of used vehicles that are WAV that meet Euro6 standards	Comment noted
All vehicles should be licensed surely	All vehicles which meet the vehicle specification policy can be licensed, this consultation is in relation to a review of the policy. If vehicles do not meet the required specification will not be licensed.
All should be euro 6	Comment noted
Dont understand the question	Comment noted
Adapting vehicles to be wheelchair accessible is expensive and Euro 5 diesels aren't very old. To prevent them from being licensed would likely result in the majority of accessible taxis being removed from service and few if any replaced as operating a non accessible vehicle will be cheaper all round especially if/when the goalposts change again and Euro 6 is deemed unworthy	Comment noted
the availability and cost of a WAV renders it difficult to obtain and unaffordable, allowing Euro 5 and Euro 6 allows some time for the car purchasing market to settle down and become more affordable again, effectively providing your licensees with some breathing space, thereby supporting your duty as an authority to ensure there is adequate provision of such vehicles.	Comment noted
The prices of WAV accessible vehicles are currently extortionate with not many drivers being able to afford a new vehicle, I believe because there's a shortage of WAV euro 5 standard should be licensed this will encourage drivers to purchase accessible vehicles.	Comment noted
Not good for environment	Comment noted

### Question 3

Do you agree that door signs for displaying operator details should be magnetic?

	Percentage	Number
Agree	65%	239
Disagree	23%	86
Don't know	12%	43

Comments	Council Response
Shouldn't have door signs the tfl don't have any whatsoever apart from a round sticker on front and rear screen	Comment noted
When the vehicle is not being used for work they should be removed and the vehicle will not be targeted	Comment noted
They can be changed and a safety risk	Comment noted
There's no need to have door signs most PH firms send text messages to customers which says vehicle registration number and driver details on it	Comment noted
I don't mind to put magnetic door signs on my car. Most of the driver used the same car as family run. If look London taxi's they don't have any door signs. Now days everything is updated. People looked at the car registration number not the door signs.	Comment noted
Door sign should be abolished	Comment noted
There has many incidents when not working my car window has been smashed due to having my door stickers on which attracts thieves. Three times I had to replace my window because of this. Also I feel door stickers are not even needed because most of time customers are notified what the car registration is. Also i have been bricked when carrying passengers in various areas which are no go for taxis. Please consider drivers safety	Comment noted

No need for any door signs the numberplate is told to the customer when they book. Saves hassle for taxi drivers who are subject to stones and there cars broken in to.	Comment noted
We live the day and age where numberplates are told to us. I look out for the numberplate rather than the sticker and confirm my name.	Comment noted
Don't even need door sign they get all details on text or app	Comment noted
As kirklees Council permits drivers to work for multiple operators therefore drivers require door signage for each company they work for, the company door signage should be magnetic so that it allows drivers to quickly switch between operators although of course the signage displaying the plate number should be permanently stook to the doors for the safety of the public. The company door signage should be allowed as magnetic to allow drivers to easily switch between operators.	Comment noted
Details of operator should be permanently FIXED	Comment noted
Reason so vehicle don't get vandalised overnight when parked on street as this always been the issue	Comment noted
Majority of council up and down the country allow drivers to have magnetic signs. Why any different with Kirklees? The driver should be allowed to removed on his day and use as a personal vehicle	Comment noted
Magnetic or no stickers at all on doors as now days we can regognise vehicles by its number plate	Comment noted
remove the stickers	Comment noted
Because when we purchase car from dealer on installment or full purchased policy and soon they come to know it's gona run in taxi they void warranty or reduce warranty which is really pain full for driver who work hard to get new car because of kirklees policy	Comment noted
I think magnetic stickers are the way forward as many drivers are working with few operators and its not practical to have permanent stickers. Also those working in health and social care should be allowed to use magnetic stickers as the vehicles are also used for work purposes. Also cars are at risk more when permanant stickers are displayed of theft and antisocial behaviour.	Comment noted

This is a must as the amount of taxis that get broken into in Kirklees is at a record high! This is because having stickers 24 hours let's criminals know it's a taxi!!	Comment noted
Local authorities like calderdale allow magnet's. Majority of drives use their work vehicle for personal use and they should be allowed to remove magnets etc when with their families doing personal errands.	Comment noted
Vehicles are used for social use as well. Magnetic stickers will be popped on when you're working	Comment noted
Because we then use our vehicles for our private use and be safe from the robbery	Comment noted
Yes definitely should be magnetic. Because we can have time with family drive take stickers off. Private hire should be magnetic because it's private higher not sticker up everywhere. Plus customers nowadays read number plates anyway with smart booking apps!	Comment noted
No	Comment noted
Some vehicles do not have metal door skins, signs should be attached by suitable fixings	Comment noted
This becomes problematic, when private hire have magnetic signs they are not always displayed – it would be better to have a blank magnetic sign to cover the permanent door sign	Comment noted
more clear at night	Comment noted
Makes it easier for drivers to run multiple booking apps and cherry pick the best fare.	Comment noted
Need more signs with bigger taxi number operater	Comment noted
Taxis are reguarly targeted just because they are taxis. When you have your kids in car and are not working should be allowed to remove the magnetic stickers, it is a horrible feeling when you are driving with family and you are thinking somebody is about to throw something at your car	Comment noted
The normal signs are in essence a sign to thieves in big writing come smash my window / break into me. London has no signs at all just a twx disc on the inside of windows so why do we have these huge signs and I personally have had my csr broke and got into atleast 10 times it is expensive and a violation when each time is happens	Comment noted

causing paranoia and stress. aswell as that every operator sends car details and customers see exact travelling location of the drivers so signs are not even needed. If they are put on a magnetic backing atleast hopefully half the cars will be smashed. I tried get a window for my smashed csr I had to ring over 50 places to get it and that was absolute extortion aswell this is how common it is.	
As long as they are securely fixed and unobscured, I don't see an issue. There are some vehicles, however, whose stickers are faded or held with tape which shouldn't be allowed.	Comment noted
As long as there is something to indicate the private hire company I don't really care. Even if more than one operator. More sophisticated operators go by reg and colour.	Comment noted
No I am not convinced this is secure enough	Comment noted
Proper permanent signage	Comment noted
A taxi is a taxi not a car that swaps its identity	Comment noted
They could easily be switched for fraudulent purposes	Comment noted
Too easily swapped between vehicles	Comment noted
Dual standards is too confusing	Comment noted
I don't know how secure this is but if its on the proposal, I imagine it's pretty secure	Comment noted
These could be transferred to other unlicensed vehicles if not fixed	Comment noted
So when we can take them off while using it for personal use	Comment noted
Both stickers or magnetic should be allowed	Comment noted
No they could easily be stolen and put on another car. They must be at the rear if the vehicle and attached	Comment noted
Drivers should display the signs whilst they are working and drivers can use same vehicle on their special occasions	Comment noted
As long as they stay on when legally obliged then anything can be used	Comment noted
Keep it safe, so drivers cannot abuse it, also risk of getting pulled off by anti social kids.	Comment noted
I have had people trying to get into my taxi when not working, had lots of hassle because they see the door signs are assume you are	Comment noted

working. I have had my car broken into twice , people see the door signs and assume you have left money in there. Having removable magnetic signs would help alleviate this	
Permanent fixing should be required. Pop rivets or screws.	Comment noted
Anything magnetic can be applied to any vehicle whether the correct vehicle or not. This could promote misuse.	Comment noted
The operators license should be permanently fixed, while registered as a taxi. A sign should be illuminated when in use.	Comment noted
They should be more permanent and not easily transferrable	Comment noted
Surely that means they can be removed and put on a non registered vehicle?	Comment noted
No because they can be taken off when being driven privately which I don't agree that they should	Comment noted
Door signs are not required anymore. When booking taxis now you the passenger will get the drivers picture, vehicle picture, make and model. If London can have taxus with out any door stickers then we in Yorkshire definitely don't need them.	Comment noted
Since your printing machines have been down and drivers working without stickers. Has this placed the public in risk. The answer is no. Modern tech of booking is now the norm and passengers are given details of the driver from photo to reg details. Kirklees stickers is about making money now not moving with times	Comment noted
I don't know because currently we have stickers and they're fine but if you make license plate a sticker that'll be great	Comment noted
I would be worried it could fly off if became dislodged at high speed, eg on a motorway.	Comment noted
Because they swap & change & use unlicensed drivers and vehicles. Dangerous. Signs should be fixed.	Comment noted
As long as theybare displayed clearly it should be driver choice as to what they want on the car. If car is used as a personal car as well as a taxi as long as in working hrs the information is displayed it's not a issue	Comment noted
Should be permanently attached	Comment noted

I don;t care if they are magnetic or permanent as long as they are large and clear.	Comment noted
Should be permanent	Comment noted
No because they are then easily removable	Comment noted
It seems to easy to remove them / lose them	Comment noted
Easily placed into unlicensed drivers cars , or replacement cars that have not been checked efficiently.	Comment noted
They should only be in place when the vehicle is in service too.	Comment noted
Stickers ruin paintwork on vehicles - we spend upwards of 30k on our vehicles and then we have to use adhesive stickers on the paintwork - unfair and not necessary as long as the operator and licence number are showing	Comment noted
All signage should be permanently attached to the vehicle and should only be removed when the vehicle reaches its end of life as a taxi/hackney carriage to prevent insurance fraud and incorrect insurance being held against the vehicle meaning	Comment noted
It would be so easy then to remove and put on an unlicensed vehicle	Comment noted
They should be a fixed sign magnetic signage open to abuse to easy or a risk just to stick it on any car and ply for trade.	Comment noted
They should be permanently fixed to the vehicle	Comment noted
How would you know if the sign had been taken off and put on a non licensed vehicle without constant monitoring	Comment noted
Many are not professional on the road. Taxis that are sprayed on with details would look more professional and hopefully make the drivers more responsible	Comment noted
There should be no need for door stickers with the technology nowadays and all apps where vehicles are tracked and all vehicle's details and driver details available to all customers look at London big city no stickers	Comment noted
Taxis should be taxis all the time, properly sign written with up to date contact information clearly displayed	Comment noted
Some vehicles may be used out of working hours due to affordability and expenses of a secon vehicle so when not working the magnetic door signs can be remove so there is no confusion	Comment noted

For drivers who use them as private vehicles as well this makes it easier	Comment noted
They shouldn't be easy to remove and swap and change. That could lead to unsavoury characters stealing them and passing themselves off as legitimate drivers to the unsuspecting public	Comment noted
I think the name of the Taxi firm should be painted on the Taxi door at a magnetic one can be attached to any car also sometimes they look like they have been thrown on all lopsided and they look scruffy	Comment noted
As I hear some drivers have stones and eggs pelt at there cars	Comment noted
I agree my next door neighbours car has been broken in to twice. It was targeted because it was showing as a private hire vehicle. Door livery should be magnetic so you can take off at night when parking your car. Whenever I book a taxi I am always notified of the car registration there is no need for door livery now. It should be magnetic if still used.	Comment noted
the use of magnetic operator signage does make is more practical for those working for more than one operator, but it also imposes the risk of the magnets being stolen and simply placed onto a non licensed vehicle.	Comment noted
I believe so long as the plate number is visible to the public the operator signage containing operator name and number should be allowed to be magnetic as drivers source work from more than one operator therefore this allows them to easily attach and detach the appropriate signage when they work.	Comment noted
Some drivers have nice cars and them use for home aswel so magnet is good so when home no body can break in to over night time	Comment noted
Yes it should be magnetic or no door stickers at all because most customers see the registration of the car .stickers attracts people to throw objects at private hire vehicles and taxis	Comment noted
When vehicle is not hired its not displaying any operator.also can be used with multiple operators.	Comment noted
Feedback from licensed drivers is that operator signage enables private hire vehicles to be identified and for the drivers to be subjected to bullying, harassment, and vehicle damage. Drivers	Comment noted



believe this is particularly prevalent where they choose to work with app-based operators who have more recently entered a market, and feel their safety can be compromised. Bolt recognises the importance of signage in identifying whether a vehicle is properly licensed and recommends Kirklees Council implement council-issued door signage only — with council logos, clearly distinguishing the vehicle as a private hire vehicle. We believe the council should consider removing the Operator signage requirement entirely. Many Licensing Authorities are opting for this approach which is aligned with the Department for Transport Best Practice Guidance.

#### Question 4

Do you agree that all existing licensed Euro 5 standard vehicles except for wheelchair accessible vehicles should cease to be licensed at 10 years old?

	Percentage	Number
Agree	47%	172
Disagree	44%	164
Don't know	9%	33

Comments	Council Response
Why not 15years like other councils	Every local authority sets its own vehicle policy and age limits vary from authority to authority.
Age limit is irrelevant to public safety Dft guidelines say No age limits	Comment noted
They should carry on, as long as MOT passed.	Comment noted
If the vehicle is in good condition it should be licensed again	Comment noted
Used vehicle prices are very high. It's very difficult to buy new vehicle in this hard time so it would be great to give them 2 years extra	Comment noted
Should be moor	Comment noted
should be 15 years	Comment noted
It's should be atleast 12 years	Comment noted
Why should vehicles be ceased at 10 year's old when purchasing a new vehicle can cost in the region of 10/15k. Drivers don't have this sort of money lying around. Work is so much quieter now than before covid and it looks like it's going to get worse . Please allow vehicles to be plated until they are no longer roadworthy however long this is. There are so many older cars well kept and low milleage that are better than newer cars.	Comment noted
Vehicles that run good should be kept going.	Comment noted
No	Comment noted

If they pass safety checks, and continue to meet euro 5 standards, and are in good condition let them operate.	Comment noted
If the vehicle is still in reasonable condition, it should still be allowed to be licensed.	Comment noted
including wheelchair accessible vehicles	Comment noted
Maximum age of any vehicle should be 8 years.	Comment noted
No age limit	Comment noted
Again what difference does a wheel chair vehicle make to the health of my lungs. The council is thinking equality before common sense.	Comment noted
100% no, should be atleast 12-13 years if not 15	Comment noted
the car is well maintained it should carry on most taxi cars are much better maintained than normal cars due to it being the earner and own and passenger security	Comment noted
The vehicles should allowed for 15 years providing they are kept maintained	Comment noted
This should be the case not just from an environmental perspective but also from an occupant and pedestrian safety perspective as newer vehicles have better safety equipment such as better airbags as well as emergency braking and pedestrian detection systems. Newer cars are also made from stronger materials which would improve occupant safety. Given both hackney carriages and private hire vehicles spend all day on busy roads near schools and in our town centres, there should be an age limit for vehicles for both an environmental and safety perspective to ensure the safety of those in and around the vehicle.	Comment noted
As long as it passes the councils MOT it should be allowed to carry on.	Comment noted
This should be in line with rest of the surrounding authorities	Comment noted
Far more carbon neutral to not be making new cars and throwing away old ones that are perfectly good. How profligate!	Comment noted
I think it depends on the vehicle and of our continued to pass MOT. My car for example is 15 years old and in really great shape but...I appreciate I do not do the miles of a taxi driver. On balance 10 years seems a fair idea.	Comment noted

Vehicles are too expensive now a days allow them maximum	Comment noted
The conditions of the vehicle rather than the age is more appropriate	Comment noted
The cars are getting expensive to afford	Comment noted
If the vehicle is well maintained it should be allowed to a taxi	Comment noted
15 years min	Comment noted
A 10 year old car is too old. Safety features improve every year. 10 years is far too old	Comment noted
If a vehicle has been maintained properly it will work well. Some cars under 10 years old should be taken off the road because of emissions etc. it should be down to a yearly test - the MOT should pick up problems.	Comment noted
I am in favour of eco friendly vehicles, so maybe as an incentive to keep euro 6 vehicles longer in trade would be more appealing as long as Euro 5 are given up after 10 years. Also extend first registered to more years for Euro 6 again a big incentive for driver to move to more eco friendly vehicles.	Comment noted
you could have a 10 year old car with 30000 or a 5 year old car with 200,000 miles on, which is likely to be more reliable and look better. If it passes an MOT sureley its safe to use	Comment noted
The condition is probably more important than the age so should probably have a yearly check similar to a Mot bur need to take in the condition of the seating etc	Comment noted
It will just add to costs. a 3 year old vehicle can be in worse condition than a 15 year old vehicle depending on maintenance	Comment noted
Minimum 15yrs	Comment noted
As long as a vehicle is maintained to the highest standards the age of the vehicle shouldn't come into it. As for Euro 5 and pollution, a well maintained 10+ year old taxi has a far less impact on the environment if it is allowed to continue in service for as long as is practicable rather than having to be replaced by a new taxi, who's build will have, by far, exceeded the environmental impact of keeping an older vehicle in service. Replace something when it is worn out, not at the whim of some idealist who thinks 'old' must be bad, when said 'old' may well have many more years useful service to offer.	Comment noted

6 years maximum	Comment noted
ALL vehicles should cease to be licensed at 10 years	Comment noted
To improve on environmental issues	Comment noted
Does the age matter? Perhaps it's the mileage that matters more	Comment noted
Again why one set of rules to another.	Comment noted
All vehicles should cease licencing at 10 yrs old	Comment noted
As long as the car is in a roadworth state and passes mot etc then age shouldn't matter	Comment noted
To keep the car up to date, and know it's safe to travel about..	Comment noted
they should be allowed to work as long as it is safe beyond 10 years	Comment noted
Should be based on the way the vehicle is performing, how it looks and if it's been looked after	Comment noted
I agree in essence, however if a vehicle is found unsuitable at any review prior to turning 10 the license should be revoked immediately and permanently	Comment noted
Not if they are kept in good order and are safe	Comment noted
Any vehicle over 5 years old should be cease	Comment noted
It depends on the condition of the car.	Comment noted
Unfair cost to driver	Comment noted
10 years is far too long for a standard car to be used as an 'industrial tool'	Comment noted
Work is quite so need a longer term on tge vehicle as long as it is upto standards	Comment noted
High mileage, high wear and tear	Comment noted
So long as a driver can provide proof that any remedial work for the emissions issue was carried out by the dealer as a result of the recall they should be allowed to continue use. Stop forcing people to throw away perfectly usable cars. Drivers who skipped the remedial work should be required to have the work done to continue using the vehicle.	Comment noted
All vehicles should cease to be licensed at 10 years old. There are already enough poor quality vehicles in service.	Comment noted
Should be same as others	Comment noted

15 years min	Comment noted
provided a vehicle passes its roadworthiness tests regularly, there is no justifiable reason to run the risk of potentially removing vehicles from fleet within the next two to three years, considering of course the fact that Euro 6 came out in 2015, effectively meaning that under such a condition, from 2025 onwards, less than 2 years, drivers could find themselves in a position of having to prematurely replace vehicles.	Comment noted
If the vehicle is well maintained and in good conditions then there should be no obligation licensing it past the 10 year mark so long as it complies with the inspection criteria.	Comment noted
They should get extention for 5 years	Comment noted
Limit should be 20 years regardless of euro 5 or 6	Comment noted
All shoud be ceased	Comment noted

## Question 5

Do you agree that all wheelchair accessible vehicles should cease to be licensed at 16 years old?

	Percentage	Number
Agree	63%	230
Disagree	27%	98
Don't know	11%	40

Comments	Council Response
Should cease till the driver wants to change vehicle	Comment noted
There's a short of WAVs and it's a cost of living crisis I think it should be open age limit	Comment noted
As long as MOT passed, 16 year or 25 years	Comment noted
Shouldn't it be based on state of building	Comment noted
16 years is decent but I think there should not be a limit as long as the vehicle is tested and runs within the legal limits then I don't see a problem for even 20+ year old vehicles. Please remember wav vehicles cost a lot more to purchase in the first place .	Comment noted
Not if they're running perfectly	Comment noted
If the vehicle is in good condition and well maintained should be granted a license	Comment noted
No	Comment noted
If they pass safety checks and are in good condition let them operate.	Comment noted
If the vehicle is still in reasonable condition, it should still be allowed to be licensed.	Comment noted
I think they should not be licensed after 10yrs	Comment noted
old cabs not comfortable	Comment noted
Max 10 years	Comment noted
No age limit	Comment noted

A non wheel chair vehicle can be in the same bad state of repair as a wheelchair accessible vehicle.	Comment noted
well maintained should carry on	Comment noted
This should be the case not just from an environmental perspective but also from an occupant and pedestrian safety perspective as newer vehicles have better safety equipment such as better airbags as well as emergency braking and pedestrian detection systems. Newer cars are also made from stronger materials which would improve occupant safety. Given both hackney carriages and private hire vehicles spend all day on busy roads near schools and in our town centres, there should be an age limit for vehicles for both an environmental and safety perspective to ensure the safety of those in and around the vehicle.	Comment noted
If it passes MOT it should carry on	Comment noted
If the vehicle is safe and road worthy it shouldn't be taken out	Comment noted
10 years max.	Comment noted
10 year maximum	Comment noted
Same standards should apply	Comment noted
Younger	Comment noted
The conditions of the vehicle rather than the age is more important	Comment noted
Should be given more time	Comment noted
If the vehicles condition is sound then it should be allowed to remain operating for 20 years	Comment noted
Should cease to be licensed at 10yrs old too.	Comment noted
Unlimited	Comment noted
If a vehicle has been maintained properly it will work well. Some cars under 16 years old should be taken off the road because of emissions etc. it should be down to a yearly test - the MOT should pick up problems.	Comment noted
Wheel chair vehicles could be expensive to buy / convert. This should be used as a incentive so drivers can invest in these vehicles so they can continue to serve the disabled community	Comment noted
No licensed vehicle should be more than 10 years old.	Comment noted



If it passes an MOT what does it matter how old it is	Comment noted
As above the condition is more important than the age	Comment noted
as above	Comment noted
Minimum 16 years ideally longer if good condition	Comment noted
10 years maximum	Comment noted
ALL taxis should cease at 10 years.	Comment noted
Seems reasonable	Comment noted
Why not have all taxis 10 years or younger so we know that the taxis are more likely to be fit for the road	Comment noted
should 10years as above	Comment noted
It should be the same 10yrs as other licenced vehicles, as a passenger's life in a trusted vehicle should be equally valued regardless of type of vehicle travelling in..	Comment noted
Or more	Comment noted
Again if the car is in good condition, services and mots are passed along with all your other safety checks not a issue	Comment noted
All vehicles should have the same timescale on them. 10 years.	Comment noted
Why should these be any different?	Comment noted
All dependent on how the vehicle looks and has been looked after, it may still have low mileage if only used for a contract and may be in better state than a much newer vehicle.	Comment noted
There is more requirement for a WAV to be in a safe and functioning manner due to the possibility of carrying individuals that cannot move under their own ability therefore the test should be more comprehensive and they should also have to adhere to the 10 year maximum lifespan for licensing	Comment noted
As above	Comment noted
This should be 5 years	Comment noted
Every taxi private hire vehicle should have a 10 year life expectancy the mileage and amount of abuse the interior takes in 10 years is astronomical technology moves at a fast rate these days at 10 years the car becomes more or less worthless and in some case seats	Comment noted

become worn uncomfortable. Modern cars are not built for the durability they are built with an of life cycle in place.	
Why should disabled users have to be driven around in a old vehicle when they are paying the same fare as able bodied users	Comment noted
Bias question with no reasonings of why 16 year old is a cut of point. Poorly worded.	Comment noted
A wheelchair accessible taxi should be checked that it's still up-to-date with access at 10years before been approved to go to 16 years old	Comment noted
Depending on the conditions of the car.	Comment noted
Unfair cost to driver. Not sure of the reasoning around this as you are saying there aren't many. Surely a car big enough for a wheelchair will be more expensive	Comment noted
I think they should be 10years old having worked on numerous vehicles with wheelchair access also I think ramps should be taken away	Comment noted
I think they should be 10 years as well OR have more frequent checks for safety	Comment noted
So long as it's had the Euro 5 remedial work done to ensure it actually works within the standards when being driven and is still safe just leave it alone	Comment noted
All vehicles should cease to be licensed at 10 years old. There are already enough poor quality vehicles in service	Comment noted
Lifetime until they don't run	Comment noted
WAV vehicles are difficult enough to source, at an affordable price, with the only WAV currently available being the LEVC at a cost of around £70k, within only real time EV mode ranges of around 48 miles. although 16 years for a serving taxi is quite a long time, with potentially very high mileage, we find that where there is an age limit in place, it is counterproductive, since where a vehicle would normally be well maintained, this ceases to be the case where there is only 12 to 24 months life left in the vehicle even if in pristine condition.	Comment noted
They are expensive to buy and convert	Comment noted

Limit should be increased to 20 years	Comment noted
It seems sensible but only if there are enough wheelchair accessible vehicles. In my view, all Hackney carriages should be wheelchair accessible so that disabled people have the same opportunity to hire a taxi.	Comment noted

## Question 6

Do you agree that all ultra-low emission vehicles should cease to be licensed at 16 years old from date of first registration?

	Percentage	Number
Agree	63%	234
Disagree	29%	106
Don't know	8%	31

Comments	Council Response
But this should be applied to all vehicles not just ultra low	Comment noted
Expensive cars should cease when the driver wants to	Comment noted
No age limit on age on emissions compliance cars	Comment noted
They should be allowed to run for as long as they can as long as they are in a good, safe condition	Comment noted
All hybrids should be allowed to 16 years not ulev (70gm) emissions as all other hybrids are just as expensive and most of the taxis wont meet the ulev limit	Comment noted
Same as above	Comment noted
The ultra low emission Vehicle electric or hybrid should be licensed till 18 years	Comment noted
Yes including hybrid and euro 6 diesel vehicles as they are low emission	Comment noted
Ultra low emissions vehicle should not have a exit time as they are deemed better for the environment. And also help reduce emissions and allow cars to be recycled and used.	Comment noted
16 years is decent but I think there should not be a limit as long as the vehicle is tested and runs within the legal limits then I don't see a problem for even 20+ year old vehicles.	Comment noted
Vehicles that are roadworthy should be kept on road.	Comment noted
If the vehicle is in good condition and well maintained should be granted a license	Comment noted

Ultra low is fully electrics only hybrids like Toyota should be given 16 years as all other councils in West Yorkshire.	Comment noted
No	Comment noted
If they pass safety checks every six months and are in good condition let them operate.	Comment noted
If the vehicle is still in reasonable condition, it should still be allowed to be licensed.	Comment noted
10 yrs - you seem to believe that a 10yr+ vehicle is acceptable. These vehicles irrespective of service history will have in excess of 150,000 miles (15,000 miles per year as a minimum), there performance will be reduced, ultra low emission vehicles including electric will have reached their end of life	Comment noted
Max 8/10 years	Comment noted
No age limit	Comment noted
Yes because they are too old and the engines will be worn to an extent where they will be polluting more nox than the manufacturers claimed at new	Comment noted
Yes 16 years sounds fair	Comment noted
They should carry on for longer as can be very well looked after so very reliable	Comment noted
This should be the case not just from an environmental perspective but also from an occupant and pedestrian safety perspective as newer vehicles have better safety equipment such as better airbags as well as emergency braking and pedestrian detection systems. Newer cars are also made from stronger materials which would improve occupant safety. Given both hackney carriages and private hire vehicles spend all day on busy roads near schools and in our town centres, there should be an age limit for vehicles for both an environmental and safety perspective to ensure the safety of those in and around the vehicle	Comment noted
If it passes the MOT it should be able to carry on.	Comment noted
10 years max	Comment noted
10 year maximum	Comment noted
This should be dependent on their actual emissions	Comment noted

Younger	Comment noted
As previous comments	Comment noted
10 years is long enough live span for any hackney carriage vehicle	Comment noted
As they are expensive to buy and there's hardly any work should be given more time	Comment noted
Should be given more time	Comment noted
Unlimited	Comment noted
If a vehicle has been maintained properly it will work well. . it should be down to a yearly test - the MOT should pick up problems.	Comment noted
16 years is a good limit by all means after 10 - 12 years introduce 2 MOT per year. Again incentivise so drivers can opt for eco friendly vehicles.	Comment noted
10 years should be the limit	Comment noted
why, theres no logical reason to. Its Low Emission, scrapping a car to buy another that has to be manufactured defeats the object	Comment noted
I agree but the criteria ulez to be 75o2 emissions I disagree all hybrids should be licenced to 16 years	Comment noted
Minimum 16 years ideally longer if good condition	Comment noted
Vehicles should be replaced when they are worn out, not at the whim of some idealist who thinks age means old! A 16 year old Ultra-low emission vehicle, as long as it is maintained in good condition, should stay in service for as long as possible. Far more environmentally friendly than a new replacement whose build will have caused far more damage to the environment, especially if it is an electric vehicle.	Comment noted
10 years maximum	Comment noted
ALL taxis should cease at 10 years	Comment noted
Seems reasonable	Comment noted
Same as above	Comment noted
should be 10 years	Comment noted
It should be 10 yrs old for all across the board. There is no equality in service otherwise	Comment noted
Or more	Comment noted

As long as car is in a roadworthy state and passes mots checks etc shouldn't matter	Comment noted
they should remain licences as long as it meets safety standards even beyond 16 years	Comment noted
They should cease at 10-years	Comment noted
Same as above	Comment noted
10 years maximum blanket enforcement	Comment noted
As above	Comment noted
All taxis should cease after 5 years	Comment noted
This is a very bias questionnaire without context and quite basic. Rather than 'I do not know' it should explore wider aspects. And explain the importance to each question. It's an absolutely awful questionnaire. Has this been peer reviewed by other councils please.	Prior to completing the questionnaire, it was recommended that participants read the draft policy to enable them to answer the questions in context with the policy. In addition, the questionnaire also gives participants the opportunity to submit any other comments at the end of the questionnaire.
It's not just about it meeting emissions but what the intearea is like after years of carrying passengers	Comment noted
Stop making life hard for taxi drivers	Comment noted
So long as it's safe and meeting the emissions requirements (tested during MOT) it's fine. That's why cars are tested periodically	Comment noted
As some of them are really nice cars so should be allowed a longer time in taxi	Comment noted
All vehicles should cease to be licensed at 10 years old. There are already enough poor quality vehicles in service.	Comment noted
As the ultra low emissions vehicles are expensive some drivers won't be able afford to buy after that period	Comment noted
Lifetime until they don't run	Comment noted
although 16 years for a serving taxi is quite a long time, with potentially very high mileage, we find that where there is an age limit in place, it is counterproductive, since where a vehicle would normally be well maintained, this ceases to be the case where there is only 12 to 24 months life left in the vehicle even if in pristine condition.	Comment noted
Limit should be increased to 20 years	Comment noted

## Question 7

Do you agree that vehicles licensed to 16 should be subject to 2 compliance tests a year between years 13 to 16?

	Percentage	Number
Agree	51%	189
Disagree	43%	159
Don't know	6%	21

Comments	Council Response
When a vehicle has its MOT like any other vehicle it goes through a tougher test	Comment noted
Mot is more than enough	Comment noted
1 compliance test per year is enough for all age vehicles	Comment noted
1 compliance test is sufficient. You will find majority of drivers maintain vehicles to a high standard as it is their investment and pride	Comment noted
Standard MOT is ok, one mot can be done by council	Comment noted
Should be one	Comment noted
But from any mot grade not only from Kirklees mot system.	Comment noted
1 test is more than enough, unless you see many faults at the time of test then it's fair enough to call that vehicle back in 6 months. Every vehicle should be different.	Comment noted
If it passes MOT the vehicle is roadworthy extra tests put unnecessary pressure on the driver.	Comment noted
Don't agree because drivers do look after their vehicles because they are their livelihood	Comment noted
One test is enough per year. Having more is pointless as spot checks are made and why is it that necessary, normal vehicles much older only have one MOT regardless of age. As long as it passes the initial compliance test there should be no need for another before the expiry date.	Comment noted



two compliance checks each year should be carried from a vehicle been 7 years old, licensed vehicles do a lot of mileage each year	Comment noted
No I don't agree with this at all should be one and mot or a check in one year as usual. Is the private MOT centre or council	Comment noted
No	Comment noted
All vehicles should be subject to six monthly checks from first being issued a licence	Comment noted
If the vehicle is still in reasonable condition, it should still be allowed to be licensed.	Comment noted
shouldnt be older than 10yrs	Comment noted
too many unroadworthy cabs on road	Comment noted
Max 8/10 years	Comment noted
No age limit	Comment noted
An extra cost a richer driver with a newer vehicle doesn't have to pay. Punishing a poorer driver	Comment noted
1 a year is more than enough, the testing centres cannot cope already with the current system, unless you do like other councils and allow subcontracting to other registered MOT centres	Comment noted
1 test is fine the council has already huge backslashes long awaits and expensive fees compared to some others. A taxi is better maintained than normal cars.	Comment noted
This is a sensible idea.	Comment noted
An annual MOT IS ENOUGH however the cost of MOT should be reduced kirklees MOT us very expensive and we should be able to get MOT,s from any respectable garage.	Comment noted
That's fair for an ageing vehicle in interests of public safety	Comment noted
No should be once a year like every other car	Comment noted
There are already enough expenses for the drivers and one compliance test is enough to establish weather its fit to remain for another year	Comment noted
From 10 to 16 years.	Comment noted
They should be off the road at 10 years as a taxi	Comment noted

The yearly MOT test is good enough - but the quality of the MOT can be an issue. Taxis should have to use licensed MOT stations that are regularly inspected	Comment noted
10 years old should be the limit	Comment noted
Car mot should be 1 year not every 6 months.	Comment noted
1 yearly	Comment noted
From 6 years to maximum of 10 years, they should have twice yearly checks	Comment noted
ALL taxis should cease at 10 years	Comment noted
Seems reasonable	Comment noted
End them at 10 years	Comment noted
should be from year 10	Comment noted
You cannot manage one test how are you going to manage two. Again is this about money or you going to do what other local councils do. Have a look at Wolverhampton And Leeds. Drivers will change to another council rather than kirklees Ask Leeds it had to change their policy as they were losing money	Comment noted
All vehicles should have 2 tests 8yrs and 10yrs. Older cars have more chance of being poorly maintained to a high standard.	Comment noted
Should be done every 2 years regardless if age if car	Comment noted
it should be tested once but mot should be done at independent mot approved centres	Comment noted
If they are allowed to be licensed after 10 years they should be subject to a test at least 3 times per year as these vehicles will undoubtedly be extremely high mileage and more susceptible to mechanical failure!!!	Comment noted
Seems reasonable for older vehicles	Comment noted
Shouldn't be used after 5 years	Comment noted
They should not be on the road as a vehicle moving paying public about on a regular basis	Comment noted
Though I do think all taxis/minicabs should have 2 tests after 6 years, many are in a shocking state	Comment noted

Taxis should be treated like our own personal vehicles with no money making schemes making their lives harder.	Comment noted
All taxis should have at least 2 mot inspections yearly starting as soon as they are registered as a taxi	Comment noted
And onwards after 16 years because if a car is still safe and running correctly within emissions requirements there's no need to remove it from service. We as a society need to stop with the constant disposal of perfectly good things because they're 'old' - it's a waste of valuable resources, carbon emissions and money!	Comment noted
I dontthink compliance test it not necessary the drivers should have a good understanding of there vehicles condition and history.... if it has good history 1test... bad list of history 2test	Comment noted
All vehicles should cease to be licensed at 10 years old. There are already enough poor quality vehicles in service.	Comment noted
There is no need yearly is OK as they are better maintained than private vehicles	Comment noted
since the very nature of the work performed means high mileage, it is not unreasonable to have 2 compliance checks/ MOT's per year.	Comment noted
Yes I agree with this as with it being an old vehicle it is important to regularly carry our inspections to ensure it is fit for purpose.	Comment noted
Why 2 yearly is good	Comment noted
1 compliance test is sufficient and other should be a normal mot from any mot station	Comment noted

## Question 8

Do you agree that electric vehicles should cease to be licensed at 20 years old?

	Percentage	Number
Agree	62%	231
Disagree	25%	94
Don' know	12%	45

Comments	Council Response
Electric vehicles should get more time on road it costs so much more to buy	Comment noted
I don't like electric cars	Comment noted
Batteries car are not reliable for high mileage	Comment noted
Depends on condition	Comment noted
20 years is decent but I think there should not be a limit as long as the vehicle is tested and runs within the legal limits then I don't see a problem for even 20+ year old vehicles. Electric vehicles are very expensive in the first place and are built to last a life time	Comment noted
Electric vehicles are not regulated properly enough unlike combustion vehicles	Comment noted
No	Comment noted
If they pass safety checks and are in good condition let them operate	Comment noted
An electric vehicle will not last 20yrs. Battery replacement on the currently most efficient vehicle has a shelf life of 10yrs - 20yrs but manufacturers only give a 5 - 8yr warranty	Comment noted
worn out suspension not comfy	Comment noted
Max 810 years	Comment noted
No age limit	Comment noted
10 years max.	Comment noted

Yes sounds fair	Comment noted
carry on	Comment noted
I feel 16 years should be the maximum with two tests from 13 to 16 from an occupant and pedestrian safety perspective as newer vehicle will be made from stronger materials and have better emergency systems improving safety for those in and around the vehicle	Comment noted
If it passes MOT it should carry on	Comment noted
Max 10 years	Comment noted
10 year maximum	Comment noted
Again depends on performance and compliance with safety and emissions regulations	Comment noted
Given that electric vehicles don't last that long, or at least the batteries don't (10 yeas max if you are highly optimistic) what is the point of this sentence?	Comment noted
Don't know enough about them yet	Comment noted
Absolutely they are still as physically dangerous	Comment noted
As previous comments, conditions rather than age of vehicle	Comment noted
I don't think EVs are the answer, hybrids like the Prius are the answer	Comment noted
Can't imagine they will still b running at 20 years! The new electrics will not be	Comment noted
The should be licensed because they are on the road.	Comment noted
Excellent initiative. Long term investment by drivers and great for environment	Comment noted
10 years old should be the limit	Comment noted
a electric vehicle wont get to be 20 years old, the batterys will be gone well before then and are too expensive to replace	Comment noted
Should be 16 years with 2 tests from 13 to 16.	Comment noted
I doubt most electric vehicles will reach 20 years old. The li-on batteries will have given up the ghost years before they reach 20 years old and proved prohibitively expensive to replace, or had set the vehicle on fire in the first 5 years of the vehicles life!	Comment noted
12 years maximum	Comment noted

ALL taxis should cease at 10 years	Comment noted
More environmentally friendly	Comment noted
If it's electric they are fine	Comment noted
Not hybrids, fully electric vehicles otherwise it defeats the object	Comment noted
should cease to be licensed at same point as other vehicles	Comment noted
Again why the electric euro 5 etc. Should be the same across. The board	Comment noted
It should be 10yrs for all vehicle types an old electric vehicle shouldn't be any different to that of a petrol or diesel vehicle	Comment noted
Don't know enough about the workings of an electric car so comment on this	Comment noted
These should be licensed until 10 years. Technology is changing so fast, in 20 years time we might find they are very unenvironmentally friendly compared to options available at that time.	Comment noted
For safety and maintenance they should be limited to 10-years.	Comment noted
All vehicles should be subject to 10 years maximum blanket enforcement	Comment noted
I don't know about electric vehicles so cannot comment	Comment noted
It should be fixed at 10 years same as petrol and diesel the vehicle is still subject to the same mileage and abuse irrespective of the fuel it's running on.	Comment noted
We don't have enough evidence to know about these cars long-term	Comment noted
Should be the same as fuel cars. More to do with the professionalism and improved responsibility on the roads as opposed to just emissions	Comment noted
If a vehicle is in good safe condition, leave it alone.	Comment noted
Sooner maybe 10	Comment noted
They shouldn't be being used at this age	Comment noted
They should be held to same standard as petrol and diesel vehicles	Comment noted
They should cease to be licensed when they are no longer safe. That may happen in 20 years, 20 months...and why run an electric car for 4 years longer than an ICE car? Provided safety can be	Comment noted

upheld a car should continue to be used	
I dont think they will last that long anyways	Comment noted
All vehicles should cease to be licensed at 10 years old. There are already enough poor quality vehicles in service.	Comment noted
10 years.	Comment noted
They should be given more times as they not cheap to buy	Comment noted
there is no justifiable reason for an EV to have a longer life than an ICE vehicle, there are still bodywork, suspension, steering, and other components parts of the vehicle that just as likely to fail as any other vehicle.	Comment noted
Expensive to buy	Comment noted

## Question 9

Do you agree that electric vehicles should be subject to 2 compliance tests a year between 13 and 20?

	Percentage	Number
Agree	46%	170
Disagree	45%	166
Don't know	9%	32

Comments	Council Response
1 test is enough for all ages	Comment noted
compliance test is sufficient. You will find majority of drivers maintain vehicles to a high start as it is their investment and pride	Comment noted
1 test is more than enough, unless you see many faults at the time of test then it's fair enough to call that vehicle back in 6 month's. Every vehicle should be different	Comment noted
Electric vehicles shouldn't be on the road	Comment noted
Mot means Mot why every 6 months when drivers do look after there vehicles because they are there livelihood	Comment noted
two compliance checks each year should be carried from a vehicle been 7 years old, licensed vehicles do a lot of mileage each year	Comment noted
No	Comment noted
All vehicles should be tested every six months from first licencing.	Comment noted
as above no more that 10yrs	Comment noted
should be 3 ayear	Comment noted
Max 8/10 years	Comment noted
No age limit	Comment noted
Same reasons as above, council cannot cope already to fit in MOTs	Comment noted
I still think it should be to a maximum of 16 years	Comment noted
This is a extra cost for the owner an annual inspection is enough	Comment noted
Should be bi yearly all it's life	Comment noted



Offer a prize to any EV that actually makes it to its 10th birthday?	Comment noted
There are already enough expenses for the drivers and one compliance test is enough to establish weather its fit to remain for another year	Comment noted
Even more than twice a year.	Comment noted
I am very sceptical that electric cars will last 13 - 20 years but yes if they are on the road and carry passengers they should have to pass compliance tests.	Comment noted
10 years old should be the limit	Comment noted
All taxis should have yearly checks	Comment noted
Should be 13 to 16 years only though	Comment noted
1 yearly	Comment noted
Twice yearly checks for last 4 years up to 12 years old	Comment noted
ALL taxis should cease at 10 years	Comment noted
Seems reasonable	Comment noted
Yes but at 8 and 10 yrs. Not over that.	Comment noted
Once annually is suffice.	Comment noted
If they are allowed to be licensed after 10 years they should be subject to a test at least 3 times per year as these vehicles will undoubtedly be extremely high mileage and more susceptible to mechanical failure!!!	Comment noted
Seems reasonable	Comment noted
The compliance cost should more affordable if two tests are needed	Comment noted
Same as above	Comment noted
See above comment about being at same compliance as petrol and diesel vehicles	Comment noted
And beyond 20 years	Comment noted
Because if they go wrong It can be very dangerous however I think your vehicle examiners need to be qualified more in depth in EV vehicles	Comment noted
there should be no difference in testing requirements	Comment noted
Yearly is fine	Comment noted
1 compliance test is ok	Comment noted

## Question 10

Do you believe that there should be no upper age limit for any licensed vehicles?

	Percentage	Number
Agree	51%	188
Disagree	43%	159
Don't know	6%	22

Comments	Council Response
Yes as long as the vehicle passes its road safety checks	Comment noted
No age limit is best for everyone	Comment noted
You will find majority of drivers maintain vehicles to a high start as it is their investment and pride	Comment noted
Yes if the vehicle is roadworthy and running there's no need to get rid. Cars are not cheap like they were before. Wages have decreased and car prices have increased.	Comment noted
Vehicles that are roadworthy can be at any age	Comment noted
If the vehicle is in good condition and well maintained should be granted a license	Comment noted
No	Comment noted
I dont think any vehicle should be over 10yrs old.	Comment noted
cars falling to pieces	Comment noted
Max 8/10 years	Comment noted
No age limit	Comment noted
The interiors are in such a state after 20 years who would want to get in	Comment noted
Although I understand the environmental argument for keeping an older vehicle on the road for longer, the safety of occupants and pedestrians should come first when it comes to taxis. An older vehicle doesn't have the same braking or airbag capabilities compared to a modern vehicle which will have added features such	Comment noted

as emergency braking and pedestrian detection as well as reversing cameras and a better safety rating	
Yes i do if it passes MOT and is Road worthy and well looked after why not.	Comment noted
Except for specialised vintage services regularly checked	Comment noted
Should depend on verifiable emissions and safety criteria	Comment noted
So long as it is serviced and MOT'd and I'm good working order as with all other cars on the road	Comment noted
Maybe the decision should be based on mileage rather than chronological age of the car?	Comment noted
Age 65 should be the cut off point for driver age	Comment noted
I think there should be a age limit but 12 years is too less as vehicles are very expensive to buy up to 16/20 years would be great and I'm sure drivers would highly appreciate it	Comment noted
As long as a vehicles condition is good then it should be allowed to remain operating regardless of age	Comment noted
Upper age limit no longer than 12yrs.	Comment noted
10 years is old enough. Cars are much safer now	Comment noted
Maximum 20 years	Comment noted
If a vehicle has been maintained properly it will work well. But there needs to be a geed enough network of inspectors the check vehicles	Comment noted
Age does not matter. Each vehicle should be assessed on its maintainance record or over all condition. A 15 year old vehicle with 100,000 miles is safer compared to 7 year old with 175.000	Comment noted
10 years old	Comment noted
as long as the car passes an MOT its safe to use, thats the idea of an MOT. If its good enough for privately owned vehicles why should it not be good enough for a taxi/PHV	Comment noted
But the condition should be checked the look as well as the mechanical okness	Comment noted
If in good condition let it carry on	Comment noted
As long as they are maintained to the highest standards, both mechanically and safety wise there is no practical reason why a licensed vehicle should have an upper age limit.	Comment noted

ALL taxis should cease at 10 years	Comment noted
Unless it is specifically a classic car/vehicle then should not be licensed after 10 years	Comment noted
I believe the maximum limit for a licensed vehicle should be 12yrs max with tests at 10yrs	Comment noted
Dependent on how well they have been maintained	Comment noted
Peoples safety would be compromised by licensing older vehicles and open the licensing authority to legal action as a result	Comment noted
Again if they are well maintained and safe	Comment noted
A vehicle is built for a purpose with a end of life cycle taxis although well maintained are subject to a life time of abuse they are not built for 24 /7 working	Comment noted
Safety is important - older vehicles may not be safe	Comment noted
All licensed taxis should have the same age limit be it private or hackney carriage	Comment noted
Maximum of 10 years old	Comment noted
Unless there are any compelling risks due to the type of safety technology used - for example lack of airbags, lack of seat belts, lack of crumple zones. Or of course if the car has been found to have serious signs of structural issues which can't be safely repaired	Comment noted
I believe a Taxi should not be any older than 10 years old they do far more miles than an average car and they are carrying the paying public so safety should be a priority	Comment noted
As above depending on history	Comment noted
10 year max.	Comment noted
The age of vehicles are important and checks need to be done	Comment noted
That will not be fair as its already licensed they should be given that extra time	Comment noted
we have to ensure that modern technology that is adapted and implemented into newer vehicles such as automatic braking, lane departure alerts etc are naturally introduced into the fleet.	Comment noted
Why mot	Comment noted

Question 11

Do you agree that CCTV should be the choice and responsibility of the vehicle owner?

	Percentage	Number
Agree	67%	250
Disagree	30%	110
Don't know	3%	11

Comments	Council Response
All vehicles should have CCTV and be registered with the ICO. All footage should be available should a customer complain, this is to ensure public safety	Comment noted
The owner of the vehicle can shop around	Comment noted
All should have cctv	Comment noted
Council should fund it	Comment noted
I think it should be the Council's responsibility to keep your drivers safe at all times	Comment noted
Should be compulsory protects passengers and driver	Comment noted
Vehicle owners should be allowed to use cctv as per safety measures. Lone workers are at greater risk of harm and such.	Comment noted
Yes because most licensed vehicles are people's private vehicles for home use with family. CCTV should be upto the driver	Comment noted
CCTV costs money installing which may never be used in the court of law. Taxi drivers tend to reject risky fares, hence it won't make a difference	Comment noted
No	Comment noted
Should be mandatory in all public and private hire vehicles.	Comment noted
There should be a better minimum standard to help protect drivers and passengers	Comment noted
All cars should have CCTV	Comment noted

it shouldn't be a choice, it should be part of the license rules. It should not be funded by Kirklees Council	Comment noted
yes but to authority standards	Comment noted
Council should pay as its an added cost	Comment noted
If I driver has conflict management skills why does he /she need a costly cctv system, taxi can be wrote of at any time. Will insurance pay this cost to install in to a new vehicle. I highly doubt it.	Comment noted
Should be fitted as standard safety of passenger as well	Comment noted
Yes should be drivers choice solely because of the cost of buying and fitting	Comment noted
It should be a choice as taxis are also used as personal family vehicles	Comment noted
it should be mandatory	Comment noted
Mandatory	Comment noted
For the safety of passengers, especially the vulnerable ones, it should be compulsory!	Comment noted
I think it should be mandatory and passengers would surely feel safer. If the driver doesn't want it... Why not?	Comment noted
I think all vehicles should have cctv	Comment noted
This should be compulsory for both the safety of the driver and customer	Comment noted
It should be mandatory on all vehicles and both interior and exterior cameras installed	Comment noted
They should be compulsory as part of the license	Comment noted
It should be clear that the taxi has CCTV if it has when a customer gets into the vehicle. I am assuming CCTV records inside the vehicle - visual and audio	Comment noted
From personal experience most of my customers prefer CCTV.	Comment noted
All vehicles used to carry paying passengers should be fitted with CCTV	Comment noted
This should be mandatory to protect the driver and passenger(s). Dual CCTV should view both passenger(s) and driver to eliminate uncertainty and hearsay should an event take place. CCTV recording should also have audio capability.	Comment noted

It should be compulsory for driver and passenger safety and remotely held	Comment noted
They should all have cctv	Comment noted
It can be expensive for taxis but useful for everyone's security. It should be encouraged, maybe some financial support given	Comment noted
All should have Cctv	Comment noted
All taxis should have cctv	Comment noted
Yes it should be the responsibility of the vehicle owner, not the authority. But choice should not be down to the owner, should be down to the authority and the passengers	Comment noted
CCTV not only protects the public but protects the driver	Comment noted
Cctv should be mandatory in all vehicles but there has to be clear signage with regards to recordings as well as clear instruction with regard to retention periods and the deletion of footage recorded. Who is responsible for the footage.	Comment noted
Council should contribute toward the CCTV	Comment noted
Each taxi should have to have a cctv	Comment noted
should be compulsory but at the owners cost	Comment noted
Council should pay for it. God knows you make enough money but mismanage it another way Welcome to the real world or managing money	Comment noted
Should be imposed. For passenger safety and drivers	Comment noted
I feel CCTV should be mandatory in all PHV and taxis for the safety of the drivers and all passengers. The Government recognises that CCTV provides a safer environment for both passengers and drivers. A great deal of criminal offences could and would be prevented if there were CCTV in all vehicles, which in turn would protect the vulnerable in our society. Over many years especially lone females have been sexually assaulted by taxi drivers and many could have been prevented if there had been CCTV in the vehicles. This is a serious crime which has long term implications for the victims	Comment noted
It should be compulsory and a requirement by the authority that a vehicle owner and driver has an operational camera at all times.	Comment noted

Yes, as long as the vehicle has operational CCTV to protect both driver & passenger	Comment noted
Should be in all cars for safety of driver and passengers	Comment noted
It should be mandatory to protect drivers and clients	Comment noted
To keep the drive as well safe.. as well as the public that get into the car	Comment noted
CCTV should be mandatory in app the vehicles and should be in working order	Comment noted
CCTV should be mandatory for everyone's safety	Comment noted
all should have cctv	Comment noted
CCTV should be a condition of licensing. It protects the driver and the passenger	Comment noted
It should be a minimum requirement and essential to gain an approved license	Comment noted
All taxis should have cctv	Comment noted
It should be mandantory in all hackney and private hire vehicles so should dash cams front and rear	Comment noted
CCTV should be compulsory	Comment noted
As part of licensing conditions I believe	Comment noted
No should be mandatory	Comment noted
Mandatory. Protect the driver and customer, although concerns about data protection is present	Comment noted
Should be law for both parties I e passenger and driver...I was once mugged by a group of taxi drivers	Comment noted
All should have cctv	Comment noted
inside facing cameras should be obligatory for the safety of both driver and passengers	Comment noted
It should be mandatory	Comment noted
All vehicles should have cctv	Comment noted
CCTV should be mandatory for everyone's safety	Comment noted
Should be compulsory	Comment noted
Cctv should be Mandatory	Comment noted
Everyone should have to use cctv	Comment noted



Should be mandatory but offset by funding by council	Comment noted
This should be accessible either remotely or by download by the local authority	Comment noted
Should be a requirement. To protect driver, and passengers. Up the accountability of drivers and safety of passenger	Comment noted
I think perhaps it should be mandatory or perhaps a tracker being fitted just to ensure safety of passengers; which could record the last 30 days but not everything given some privacy to drivers. It could be looked at only in a complaint/incident	Comment noted
CCTV is to protect the driver and the customer	Comment noted
It needs to be mandatory	Comment noted
we do not agree with mandatory CCTV conditions, but it is essential that a minimum standard and criteria is set in place to ensure that any devices used are fully ICO and UKGDPR compliant, which rules out the use of any dashcams for licensed vehicles for many reasons	Comment noted
Should be compulsory for safety reasons	Comment noted
I think all taxis should have cctv for safety purposes both for passenger and driver.	Comment noted
All private hire vehicles should have independent cctv in them to protect the public	Comment noted

## Question 12

Do you agree that windows (other than the front windscreen and front passenger windows) should be manufacturers standard tints?

	Percentage	Number
Agree	77%	286
Disagree	18%	65
Don't know	5%	20

Comments	Council Response
What is manufacturers tint? this part is misleading and open to interpretation. All windows should be kept clear as per the front windows and side windows for public safety	Manufacturers standard tints are the level of tint that is given to a vehicle as it comes off the production line as a standard.
Manufactured spec should be allowed instead of percentages	Comment noted
If vehicle is standard then fine	Comment noted
What is different from manufacturer or after market it should be allowed but a certain amount of darkness	Comment noted
Midt vehicles now have slightly tinted widows	Comment noted
Low level tints should be allowed. Some passengers prefer abit of privacy.	Comment noted
As long as it's legal any tint or film should be allowed	Comment noted
All vehicles with factory tints should be allowed there should be no restrictions	Comment noted
manufactures tinted should be allowed without any light percentage	Comment noted
No	Comment noted
As long as the tints are legal	Comment noted
Any tints on rear screens is a bad idea	Comment noted
no safety with tints cant see in to see if its safe	Comment noted
A lot of cars come as standard	Comment noted
or any legal tints should be allowed	Comment noted

This is a sensible idea.	Comment noted
It's up to the owner of the vehicle and as long as no laws are broken the council should stay out of this issue.	Comment noted
windows should be clear.	Comment noted
All clear glass	Comment noted
Zero tints	Comment noted
They should be manufactured tints or we can tint them as long there in limit	Comment noted
When I bought my taxi car new in 2020 I was told not to have tinted windows at all because it will not be allowed and will fail its compliance test which meant i couldn't purchase my desired spec car. But I've seen many newer and older vehicles with factory tinted windows in operation since. Either way rools should be the same for everyone.	Comment noted
Who wants to travel in a car with dark windows?	Comment noted
Back rear windows don't matter	Comment noted
theres nothing wrong with tinted rear windows. Some people like anonymity and dont want to be seen. Victims of domestic abuse for example dont want their whereabouts to be known. If windows cant be tinted to the police can see who is in the back then Burkhas or any face coverings should also be banned	Comment noted
Any tint as long as legal 70% back 30% front	Comment noted
No vehicle taking payment for travel should have tinted / privacy windows	Comment noted
It should be uniform	Comment noted
Why should they be tinted? There is no need for this other than aesthetics	Comment noted
Not sure why this would be a requirement	Comment noted
Unless they come with the tinitis don't think theybshould be allowed at all	Comment noted
It's a taxi not a bloody pimped out car 🚗🚗	Comment noted
Most vehicles now come with tinted windows as standard. It's costly to have these changed as many of them do not meet licencing standards. Should be allowed to be tinted as per manufacturers	Comment noted

standards but NOT amended from that (unless tints have been chosen to be removed by owner) defo not darker	
There should be no non standard modifications allowed. If any modifications are present the license should be denied or revoked in the case of a test. All cars/vehicles produced in the last 15years have sufficient sun protection as standard (the only need for additional tints)	Comment noted
Should not be tinted...I would feel like I am in a grooming gang car.	Comment noted
If a person buys a car they will buy what is good for them not have a measuring system to check if it's kirklees compliant or not. Individuals are already getting penalised by kirklees council on things such as MOT when a private MOT should be accepted that's like saying the cars on the roads we see are not fit for purpose because they have a private MOT. Kirklees council need to support the drivers who are trying to put food on the table especially during the cost of living having gone through the roof.	Comment noted
So long as it's legal it's fine. If you don't like taxis with tinted windows don't use them and of enough people don't use them the drivers will getvthe message and remove the tint. I imagine most people don't care, and others probably appreciate the fact that the tint reduces heat and glare from the sun!	Comment noted
But also allow privacy windows as I don't mind tinted windows... they also reduce UV light and sun light in the car	Comment noted
No tints. For protection of all occupants	Comment noted
Tinted windows makes no difference if you buy them with them on you have no choice but to get them taken off which is unfair.	Comment noted
Any tints	Comment noted
we have written several articles on this subject in the <a href="http://www.phtm.co.uk">www.phtm.co.uk</a> , and successfully taken one local authority to court under judicial review, as there is no lawful or logical justification for not allowing manufacturers standard glass, furthermore, a vehicle is presented as manufactured in order to achieve M1 type approval for the vehicle, making such structural changes to the vehicle undermines the M1 type approval of the vehicle, and can have	Comment noted

<p>insurance implications too. i would go further to state "all windows" since the front windscreen and front passenger windows are also manufactured to satisfy national legislation of 75% light for windscreen and 70% front side windows.</p>	
<p>Due to 99% new vehicle coming with manufacturers tinted glass.</p>	<p><b>Comment noted</b></p>

### Question 13

Do you agree that blackout/privacy glass and self-applied material/film should not be permitted on licensed vehicles?

	Percentage	Number
Agree	66%	243
Disagree	27%	99
Don't know	7%	27

Comments	Council Response
Films reduce harmful rays entering a vehicle	Comment noted
This licence is also for private and pleasure use	Comment noted
Only manufactured windows should be allowed	Comment noted
It's should be allowed but limits should apply	Comment noted
Low levels should be allowed. Some passengers use taxis and prefer privacy when commuting.	Comment noted
Factory fitted privacy glass must be allowed because it is fitted as standard to most cars now	Comment noted
If it's legal then it should be allowed	Comment noted
public safety	Comment noted
No	Comment noted
It should be permitted on any licensed car	Comment noted
tints not needed for people dont feel safe	Comment noted
It just shouldn't.	Comment noted
if it is legal it should be allowed why is different laws applicable	Comment noted
This is a sensible idea.	Comment noted
As long as the UK law is followed it's ok	Comment noted
As long they in the limit should be fine	Comment noted
As longs they in limit	Comment noted
They shoukd never be allowed to do this even if it is legal	Comment noted
Just why not?	Comment noted

As long as legal shouldn't be problem	Comment noted
Why would you need blackout/privacy glass?	Comment noted
No vehicle taking payment for travel should have tinted glass, anywhere	Comment noted
Not sure why this would be a requirement	Comment noted
If this is found the license should be denied or revoked if discovered at retest	Comment noted
Why would this be necessary?	Comment noted
I agree people shouldn't put film themselves but feel that if that's the way they bought the car then that should be ok. It's bizarre how up until now It's never been mentioned but all of a sudden drivers are being targeted from all sides for some reason. Please stop forcing them out as there will a lot of people who feel that they are being targeted from all sides from kirklees. Other councils have allowed so many taxis in to kirklees as it is making it hard to earn a decent living as it is.	Comment noted
Lots of people who take taxis may be more vulnerable, for the safety of the passenger and the driver the interior should be clearly seen at all times	Comment noted
If passengers don't like it they can use a different taxi - vote with their feet. As above	Comment noted
Why are these things needed on a Taxi I thought this kind of window tinting was against the law anyway	Comment noted
As above	Comment noted
As long they in the limit should be no problem	Comment noted
If they are in the limit they should be allowed	Comment noted
anything other than manufactured standard should not be allowed, in fact the fire brigade also do not support aftermarket tints as they turn standard shatter glass into laminated glass, making it more difficult to get people out of a vehicle in the event of a serious RTA	Comment noted
If the glass isn't manufacturer tinted then this should not be permitted	Comment noted
As long as its not factory tinted glass	Comment noted
As long they in limit	Comment noted

Blackout / privacy should be allowed but not self applied material / film	Comment noted
As long they in limit	Comment noted



Question 14

Do you agree that MPV's (multi-purpose vehicles) and SUV's (Sports Utility Vehicles or 4x4s) should not be licensed?

	Percentage	Number
Agree	57%	211
Disagree	30%	111
Don't know	13%	50

Comments	Council Response
I see no reason why MPVs should not be used as per manufacturers approval. I agree that SUVs and off road type vehicles are inappropriate	Comment noted
They are easy to get in	Comment noted
Should be licenced	Comment noted
From my perspective any vehicle should be allowed especially in ph as supply and demand is changing with customers and many do inquire about mpv and suv infact I was thinking mercedes gls or x5 as an executive transport there is a market out there.	Comment noted
Some customer with back pain illness can sit in and out from MPV easily than saloon cars	Comment noted
There more roomy than a car so I don't understand why not	Comment noted
Drivers discretion	Comment noted
Should be driver's choice end of the day its driver's who pay for there vehicles not council	Comment noted
All cars should be allowed	Comment noted
No	Comment noted
If vehicles can carry passengers and their luggage then any vehicle should be permitted. I've had hips replaced and have problems with some standard cars. 4x4's might just be an advantage round here in winter.	Comment noted

What is wrong with larger vehicles like MPV's able to carry more passengers at once for larger groups?	Comment noted
I think there might be a need for these types of vehicle	Comment noted
too much pollution	Comment noted
However I might add that oap struggle to get in to these cars.	Comment noted
MPVs are impractical when it comes to seating people in the rearmost seats and SUVs shouldn't be licensed as we don't need more SUVs in our town centres or near schools.	Comment noted
It's down to each individual owner and what his customers like	Comment noted
Again depends on emissions and meeting safety standards	Comment noted
I can't se many being needed but for airport runs, group hire etc they are useful	Comment noted
Why not if the owner wants to he can	Comment noted
Every driver has his own needs should beeb given plates	Comment noted
They are too big and take up too much room on the road	Comment noted
Mpv are usually more seating capacity needed for School runs. It would affect the local community. No driver I have known is going to license an SUV anyway. 4x4 now a days can be more eco friendly then standard vehicles, so assess case by case. Also if there is a licensed vehicle which is 4x4 serving community in a rural area may still need licensing.	Comment noted
theres nothing wrong with them, some people actually find getting in and out of higher vehicles easier	Comment noted
The type of vehicle is irrelevant	Comment noted
Mpv should be allowed 5/6 seater because buying mini busses cost is very high and customer paying extra for mini bus when there are only people	Comment noted
Should be licensed	Comment noted
Difficult to define SUV/MPV	Comment noted
Such vehicles are vital to the transport of small groups	Comment noted
There is no reason for suv etc...to be used a taxi	Comment noted
No need for them	Comment noted
These types of vehicles are just as useful as minibuses	Comment noted

both have a place, rules around age as above	Comment noted
Are they safe yes Can they carry passengers yes Then should be allowed	Comment noted
SUVs should be allowed but not MPVs	Comment noted
As these can provide a more accessible service for the user ie disabled, less mobile and depending on terrain access, ie if someone lives off a main road.	Comment noted
In Yorkshire 4 x 4 vehicles are useful in times of ice and snow	Comment noted
What about more than 4 passengers?	Comment noted
So long as it's suitable for use on the road and can carry passengers who cares what shape it is? In more rural areas a 4x4 may actually be beneficial for certain passengers	Comment noted
As 5 seater cars are getting smaller aruis corolla.....an alternative is 4x4s	Comment noted
Alot of drivers need 7 seater mpv for private home use should be allowed	Comment noted
So long as it can get me from A to B faster than a bus i don't care what car it is	Comment noted
SUVs may be useful especially especially for travel to rural locations	Comment noted
Drivers with big family's will needs mpvs for there private use not just for taxis	Comment noted
many drivers like the higher driving position of such vehicles, as it allows them to see the road ahead much clearer, furthermore, the DFT best practice guidance of 2010 clearly stated that no vehicle should be automatically excluded from being licensed	Comment noted
Driver needs it for personal use	Comment noted
They should be licensed	Comment noted
In snow do need 4x4 vehicles.	Comment noted

## Question 15

Do you think licensed vehicles should be allowed to tow trailers?

	Percentage	Number
Agree	48%	177
Disagree	37%	137
Don't know	15%	56

Comments	Council Response
As long as they meet trailer MOT requirements	Comment noted
I can see no reason why not, it may make longer trips and airport runs more efficient - both for the driver and for the environment.	Comment noted
Some 6 seater vehicle and companies who do airport runs require extra space for luggage so what's the issue	Comment noted
Yes should be	Comment noted
Yes upto driver	Comment noted
Taxi ride is different to towing trailers	Comment noted
No	Comment noted
Given the standard of driving of taxis I've witnessed recently I wouldn't trust them with a trailer. I think they should all have to have cctv/dash cams and trackers fitted and examined regularly	Comment noted Complaints about standard of driving can be submitted to <a href="mailto:licensing@kirklees.gov.uk">licensing@kirklees.gov.uk</a>
Useful for those offering to carry additional luggage for passengers	Comment noted
But only for airport/luggage runs - not sure how to enforce this	Comment noted
Airport runs!	Comment noted
nonsense not safe	Comment noted
Not whilst on duty. Off duty it's a private vehicle	Comment noted
I believe it should be the choice of the owner. They may have passengers heading to the airport with lots of luggage. I have seen private hire vehicles with trailers from other authorities and don't see an issue.	Comment noted

Yes Because I use my vehicle for my own pleasure as well and should be allowed to put a trailer on it just like any normal car.	Comment noted
Subject to an additional test	Comment noted
Not sure if u mean that they have a trailer when they are working ir for their own use	Comment noted
Yes if the insurance covers	Comment noted
Trailers should only be drawn by the people who own them or specially trained personnel. Not taxi drivers.	Comment noted
Why not? As long as relevant insurance / MOT is there	Comment noted
yes, as long as they are driven in a safe manner. I cant see why taxis/PHV drivers should be treated any differently to a private motorist. We all have to pass a driving test which shows our competence to drive	Comment noted
But only if it is an MPV/mini-bus type taking a large group to an airport/seaport/holiday resort and the trailer is used for luggage.	Comment noted
Trailers could be used but subject to yearly checks for safety	Comment noted
This should be restricted to vehicles capable of towing ie SUV's and certain MPV's. Standard cars should not be allowed to tow whilst used as a Taxi.	Comment noted
Safety is paramount. Not every driver will have trailer licence on his or her licence	Comment noted
Licensed vehicles should be used for just that	Comment noted
For airport runs only	Comment noted
Airport providers for example. But trailers should be inspected at 12 month intervals	Comment noted
Again what's the difference to a normal car	Comment noted
It could enable users to move eg furniture, go camping, visit a tip etc.. so could be more flexible a way to help users	Comment noted
For airport services to hold suitcases etc	Comment noted
If used out if work yes, not while theybare working	Comment noted
Again it's a taxi .. not anything else .. so NO	Comment noted
Only when NOT in passenger service	Comment noted

The vehicle should be suitable for purpose in its standard configuration	Comment noted
If it is safe to do so	Comment noted
Some taxis carry multipul people to airports etc and their luggage needs to go somewhere	Comment noted
It would be a useful addition	Comment noted
Can the driver trust a passenger's trailer? Probably not worth the risk. I can't imagine a driver driving around picking people up with a trailer hitched just in case! One use case could be if a passenger needs a load moving but there are specific services for that.	Comment noted
Air port travel?	Comment noted
there are occasions where passengers travelling to and from the airports, seaports and rail stations, travel with too much luggage to fit inside a vehicle, which then requires additional luggage space to be made available, we see no justification for not allowing such a service to be provided	Comment noted

## Question 16

Do you have any other comments regarding any of the other proposed amendments to the existing vehicle specification, or any proposals you wish to put forward?

<b>Comments</b>	<b>Council Response</b>
There are some elements of the regulations around vehicles that I do not think are needed (why does a roof window need to function for example and why should a car be polished?). I am also concerned at the failure rate for vehicles stopped for random inspection. If the rules were less numerous and more focussed on actual safety, it may be easier to enforce the smaller number of safety related standards and ensure drivers concentrate on compliance.	Comment noted
Get rid of the stickers full stop	Comment noted
I think there shouldn't be any age limit for private hire as far as vehicle is road worthy If the vehicle is not fully maintained and no good enough for roads than don't give permission to drive	Comment noted
Private hire firms should not be allowed to use the word taxi as a company name- regardless if they employ or have hackney drivers working for them.	Comment noted
I want to remove door signs. Only licensed plate on back	Comment noted
Now a days council is not issuing door sign even though they take money for door sign so it better to abolished the door sign permanently	There was a short period when the Council's door sign printer was not working, once they were fixed door signs were taken to the licensed operators to be distributed to those drivers affected.
Licensing fees need to remain the way they are. Cost of living is very high drivers are barely making ends meet. Please consider not raising this and also allowing hybrid vehicles to stay licensed up to 15 years.	Licence fees do not relate to this consultation. Other comments noted.
My polite request to the council is to not change the taxi plate every year, renew the previous one, when the driver changes the vehicle, then he should be given a new taxi plate, thank you	The plate on the rear of the vehicle shows the expiry date of the licence, this is to ensure vehicles aren't being used without a current licence.

Give some operators an inch and they will destroy their own businesses. Taxis as public service vehicles , MUST be REGULATED	Comment noted
Hybrid and low emission vehicles euro 6 should have no age restrictions and allow 2 compliance test annually to keep them road worthy and passenger safety	Comment noted
Euro 6 licenced vehicle should have extended period	Comment noted
It would help flow of traffic, improve air quality and provide the people of Kirklees more public transport options at busy times around Kirklees, to allow private hire vehicles to use bus lanes in and around the district.	This comment does not relate to the vehicle specification policy consultation.
We should have choice to get mot testing done any mot place as it very hard to book with kirklees mot center..	This comment does not relate to the vehicle specification policy consultation.
council should accept private MOT certificates	This comment does not relate to the vehicle specification policy consultation.
Please allow private hire taxi to use bus lane or bus gate .it will reduce high level of pollution .time concompion .also will bring more trade to town .like shopping etc .	This comment does not relate to the vehicle specification policy consultation.
Any Private hire Euro 5 Diesil should get at least 13 years from date of registration due to cost of living it's not fare with drivers to change there vehicle if it's in good working condition if necessary there could be 2 compliance test after 10 years of age	Comment noted
Pls allow private hire drivers who also work in other settings to use magnetic stickers. These can help bring down taxi crime rates discrimination and also allow drivers to use different ones for different jobs	Comment noted
Stop out of town cars working here E.g wolves Let Uber have a limit . They are controlling and taking over	This comment does not relate to the vehicle specification policy consultation.
It's the driver not the vehicle, old vehicles are much better than newer ones. Simpler more safe	Comment noted
None	Comment noted
It is very confusing to differentiate between taxis and PH when the companies are called taxi in their names. I must be the only one in my household who knows the difference otherwise they are all taxis,	Comment noted



I bet i am not the only one. Private hire companies should not be allowed to have taxi in thier company name as this causes confusion to those who don't understand.	
If the vehicle is in good condition and well maintained should be granted a license	Comment noted
All hybrid cars should get 16 years licence. And can be licensed within 16 years of age. Magnetic stickers should be allowed for private hire! Because private time with your family you can remove stick stickers and have a nice trip with family without people staring at you and throwing stones misbehaving.	Comment noted
No	Comment noted
A vehicle should be able to have a license as long as the car is well Maintained and and is safe.	Comment noted
All kirklees taxis and private hire should have only private m.o.t were it suits our needs we're to get it done by it takes up to 6 or more weeks to get appointment with kirklees and driver is at lost	This comment does not relate to the vehicle specification policy consultation.
The attachment of taxi licences to registrations plates is illegal but this is still allowed to go on and should be totally banned and should be done by the licence authorities and the police	This comment does not relate to the vehicle specification policy consultation.
There needs to be better offerings for those with pets with conditions placed on passengers but also more requirements for drivers to accept bookings	This comment does not relate to the vehicle specification policy consultation.
Telematics should be compulsory	Comment noted
better sinegage especially at night cabs smell of smoke/vape	Comment noted
European Taxis are modern,clean,safe and with standard signage.....ie Spain,Germany.	Comment noted
All councillors on licensing should be made to go out and pick up a few drunks on a Saturday night. Use the sat nav so no route mistakes. And see what drivers have to deal with then think about equality laws and extra costs when implementing your crazy policies.	This comment does not relate to the vehicle specification policy consultation.
Too many taxi still can be haild to pick farye up,then radio through, should be banned ,more checks on safety lights, etc, no smoking.	This comment does not relate to the vehicle specification policy consultation.
Door signs is a big issue, i am fearfull when i have my family in car and waiting for someone to throw a stone/brick towards my car	Comment noted

Kirklees needs to put its cost down. Every thing is being automated yet cost are going up. We should be able to take our cars for a MOT to any respectable garage	This comment does not relate to the vehicle specification policy consultation.
The use of ULEV vehicles should be encouraged and incentivised, as in line with Kirklees Council CCAP Action T1.6, with the view of making them mandatory not optional by 2038.	Comment noted
No	Comment noted
Drivers should pass an advanced driving course	This comment does not relate to the vehicle specification policy consultation.
All drivers of petrol or diesel engine vehicles should switch off their engines while waiting for fares or be heavily fined	This comment does not relate to the vehicle specification policy consultation.
Hi Kirklees council should increase the vehicles age limit like so many other councils are doing in these hard times everything is so expensive now cars are more expensive and insurances has gone up cars repairs fuel licences fee etc we are private hire drivers but we are also members of the public in these difficult times Kirklees council should make things easy for us thanks	Comment noted
As vehicles are expensive to buy should be given more than 7 years to plate	Comment noted
The vehicles should be allowed to remain in operation till they are no longer In a satisfactory condition to do so.	Comment noted
Hygeine tests for all vehicles at least once a year. Since Covid hand sanitisers should be available in all vehicles.	Comment noted
The future of all vehicles lies in the established and improving hybrid vehicle which will self charge in use. No need for charging points and less weight on roads already in need of significant repair	Comment noted
Perhaps the taxi driver should have to take an advanced driving course? I'm not sure what standard they have to drive to, but when I follow one in Kirklees, I don't think I have ever seen them use an indicator. Mirror, signal, then manouver. Not the other way around would help other road users	This comment does not relate to the vehicle specification policy consultation.
Should be 1: 1 West Yorkshire licensing authority 2: DVLA mot should be accepted 3: DVLA rules should be applied for taxi drivers	Comment noted, part of the comment does not relate to the vehicle specification policy consultation.

<p>like penalty points 4: online 3 years renewals 4: more enforcement officers one the roads to spot on checks 5: Hard punishments for drivers who doesn't maintains their vehicles mechanically. 6: Computerised data sharing between Operators and licensing authority to make easier to spot on checking for enforcement officers. Licensing authority should not use 1990 system in this digital time. I'm happy to attend any consultation meetings to answer any Questions in more details. <a href="mailto:Muhammad.Ansar@07852265124">Muhammad Ansar 07852265124</a></p>	
<p>A taxi should have to carry a spare wheel and means to fit it. There is a change in the wording of some rules such as 1.3 when 'will be rejected' has been changed to 'may result in'. This is wrong. If something is incorrect it must be rejected. A 'may be' statement allows wriggle room and arguments from drivers which will waste the time of inspectors. It should be a definite condition. Take out all the 'mays' and put 'will' or 'must' Remove from point 1.12 the sentence 'This is especially so given that ....from sale in the UK from 20230' - The government are already distancing themselves from this condition and it seems pointless to include a condition into your vehicle specification that may not be true</p>	<p>Comment noted</p>
<p>Go by example of other councils such as Bradford. Licensing older eco friendly is a good incentive. If you don't, this is not 80's where drivers will work in the area that they're licensed at. Drivers will license from Bradford, live in Huddersfield and work in Leeds. Thanks to UBER. Wolverhampton is another good example. So stop being stubborn and big - headed and risk of losing licensees to other council who are just getting richer.</p>	<p>Comment noted</p>
<p>Can it please be checked that the drivers know the HIGHWAY CODE, as a large amount of taxi drivers frequently run red lights and are often pulling out without indicating and cutting other road uses up, which makes them a danger on the roads.</p>	<p>Comment does not relate to the vehicle specification policy consultation.</p>
<p>Please treat the taxi drivers like you treat the other council workers because most of the times we feel like criminals the way you treat us</p>	<p>Comment does not relate to the vehicle specification policy consultation.</p>
<p>All passengers vehicles carrying paying customers should be no older than 10 year for safety and environmental issues.</p>	<p>Comment noted</p>

Stop inventing ways to increase costs and overheads for honest working people	Comment noted
What is the council doing apart from putting fees up.? How are you going to help your driver to get on to more environmental friendly cars? Are you going to give grants like leed and Bradford council? Fees go up significantly every year if we complain and ask for the high cost the reply from the council representative is that Leeds and other neighboring councils have put them up too yet You do not realise that they work in city's not town and villages like us where the earnings is less. Yes other councils have put fees up but they have also given grant to drivers to get electric / hybrid cars where as you do not have any idea how you will help the kirklees licence holder.	Comment does not relate to the vehicle specification policy consultation.
Allow wav upto at least 16 years or longer if running good Allow all vehicles at least 15 year's or longer	Comment noted
Speeding is common in taxis and sometimes dangerous driving. What can be done?	Comment does not relate to the vehicle specification policy consultation. Complaints about standard of driving can be submitted to <a href="mailto:licensing@kirkleess.gov.uk">licensing@kirkleess.gov.uk</a>
Make the taxi drivers accept your dog. Few weeks ago 5 companies wouldn't accept our dog so we had to stay overnight at friends. Shocking service	Comment does not relate to the vehicle specification policy consultation. Complaints about drivers or operators can be submitted to <a href="mailto:licensing@kirkleess.gov.uk">licensing@kirkleess.gov.uk</a>
Drivers need to be tested as terrible drivers sometimes. Vehicles can be very old	Comment does not relate to the vehicle specification policy consultation. Complaints about standard of driving can be submitted to <a href="mailto:licensing@kirkleess.gov.uk">licensing@kirkleess.gov.uk</a>
Why is there nothing about the drivers themselves . This is all about vehicles . Drivers should not be allowed if above 6 points . We should not risk people with drivers with lots of points on licence . Would council employ them . Would other firms employ them . If not why are we risking people with poor driving standards .	Comment noted, this consultation relates specifically to the vehicle specification policy, the driver suitability policy was reviewed and consulted upon in 2023.
The vehicle and the driver are two separate entities. The vehicle should be licenced and the driver should too. But the vehicle is only licenced if driven by a licenced driver. I thought the survey might touch on driver training?	Vehicles, Drivers and Operators are all licensed independently. This consultation is specifically in relation to the vehicle specification policy. Other policies such as the driver suitability policy and driver training are reviewed regularly in accordance with the guidance for timescales for the review of policies.

White taxi cabs are well overpriced. I would prefer to use one but too expensive compared to other local taxis	Comment noted.
Please make all the processes easier for everyone too many bureaucratic hurdles such as going to office finds out door is locked only som	Comment does not relate to the vehicle specification policy consultation.
It is imperative that a driver is assessed as rigorously as the vehicle and vice versa and that it is equally across the board and not favouring one type of vehicle over another. I also think 2/3 seater mopeds/trikes and could be something to consider for a taxi service too, and are greener	Comment does not relate to the vehicle specification policy consultation.
Let vehicle run until stop working	Comment noted.
Trackers installed to ensure safe driving practices and adherence to speed limits	Comment noted.
The price of getting into the car, it's really expensive ... so that needs to be sorted out the price !!!!!	Comment does not relate to the vehicle specification policy consultation, price of vehicles is not something the local authority has any control over.
A common sense approach is vital. If you add to the costs of running a taxi business they will have to pass those costs on and whilst it is vital that vehicles are maintained properly there is no benefit to raising costs to taxi owners and therefore their customers unnecessarily in the current economic environment.	Comment noted.
Vehicles should have a max life span of 10-years. The company name should only be displayed when the taxi is "in service", hence the use of magnetic plates.	Comment noted.
Licenced vehicles should not be able to be 'cash only' Not many people carry cash with them and I caught a taxi near Huddersfield trainstation that only accepted cash and they had to drive me to a cash point for me to withdraw money for the journey. This not only made the journey longer, more expensive and arrived later than expected. This also calls into question are the drivers declaring all there income to the HMRC.	Comment does not relate to the vehicle specification policy consultation.
Boot space should be a minimum size capable of carrying suitcases, folding wheelchairs etc. Conversations between drivers and their bases should be conducted in English language.	Comment noted.

<p>The current maintenance levels of some taxis operating in the area are diabolical and it is clearly evident that modifications are taking place after the initial licence is issued. All Hackney Carriages and private hire vehicles should be retested thoroughly twice a year as a minimum</p>	<p>Comment noted.</p>
<p>I think that some sort of notice explaining that the driver has been police checked should be displayed with a picture of the driver I think that noisy music should not be playing when you are travelling and that the driver should refrain from talking on the phone for the journey</p>	<p>Comment does not relate to the vehicle specification policy consultation.</p>
<p>As previously stated all licenced vehicles should have mandatory cctv and dash cams to keep the driver and customers safe in this day and age it shouldnt be an option you get on a bus they all have them</p>	<p>Comment noted.</p>
<p>All Hackney carriages should be disabled access vehicles</p>	<p>Comment noted.</p>
<p>I think the metre should be removed and be charged a flat fee rather than a variable</p>	<p>Comment does not relate to the vehicle specification policy consultation.</p>
<p>Context to this questionnaire would be helpful it's awful written and not valuable from an input perspective. It's almost bias</p>	<p>Comment noted.</p>
<p>We need electric vehicles. Keep up kirklees</p>	<p>Comment noted.</p>
<p>Taxis parking on zebra crossing and any other crossing whilst dropping off or awaiting a fare should get a automatic points deducted on there licence</p>	<p>Comment does not relate to the vehicle specification policy consultation. Complaints about specific vehicles/drivers can be submitted to <a href="mailto:licensing@kirklees.gov.uk">licensing@kirklees.gov.uk</a></p>
<p>There should be no door signs its ruining our cars and bodywork the council wont pay us for that, look at tfl council in london they literally dont have anything on the vehicle apart from little sticker on windscreen and why cant we do the same</p>	<p>Comment noted.</p>
<p>Please show some Kindness to these people trying to earn a living don't force them out of work. Please try accommodate them not penalise them at every opportunity. I believe if the council keep this up they will make it hard for many people who are trying to feed their kids in these difficult times. Show compassion as they say if it ain't broke don't fix it.</p>	<p>Comment noted.</p>
<p>Safety for the driver and passengers is paramount. So testing and age of vehicle should be the priority. I also think fixed fares should be</p>	<p>Comment noted.</p>

the norm . Some drivers definitely take more expensive routes than they need to . So many traffic lights in Huddersfield post codes that a very short trip can cost an awful lot.	
I think too many taxi vehicles are not road worthy and some are very dangerous inside the vehicles	Comment noted. Complaints about vehicles can be submitted to <a href="mailto:licensing@kirklees.gov.uk">licensing@kirklees.gov.uk</a>
Leave things alone and stop making lives harder	Comment noted.
All taxis should allow card payment and have government approved tracking / monitoring system fitted, too many fiddling the system by having mileage altered on a weekly basis	Comment noted.
Less restrictions. Public transport is not up to the task, the more you strangle cars the more you strangle the town. It's already a maze of bus gates and one way systems, don't make getting taxis impossible too! Also there are far too few EV charging points in Huddersfield. There needs to be a usable alternative before you start making people spend money on things they already have	Comment noted.
I think that there should be a camera on the front of the taxi and the recordings can only be viewed by the licensing board and if seen to be driving aggressively or running a red light they should have their licence removed	Comment noted.
Both Hackney and private hire should follow same fair policy set by council ( same rate same fare) as it ridiculous that one can charge double the rate than the other.	Comment does not relate to the vehicle specification policy consultation. Fares for private hire cannot be set by the local authority.
Too expensive. Should have ability for contactless payment	Comment does not relate to the vehicle specification policy consultation. Fares for private hire cannot be set by the local authority.
I think we should have some female only taxi drivers.	Comment does not relate to the vehicle specification policy. The authority cannot require any person to become a licensed driver.
I believe that an option to pay by cashless means should be a mandatory requirement. Many operators accept cash only payments which is dangerous, as it gives opportunities to criminals to access the system. The standard of Hackney Carriages and Private Hire in Kirklees is diabolical and must be addressed	Comment noted.

think that additional checks on the drivers should be done for the safety of the passengers and to prevent people impersonating taxis. Thank you	Comment does not relate to the vehicle specification policy consultation.
No	Comment noted.
Door livery should be magnetic or totally scrapped as in a lot of areas there is stones thrown at cars. Taxis are targets. Drivers and passengers are both at risk. Kirklees council need to consider this as stones and other objects are thrown at the car with it being a taxi. Who is left to pay damages. The driver no one else and most importantly safety of passengers and then myself is very important.	Comment noted.
Whatever policy u make.make sure it's advertised correctly and licensing staff knows it.currently everytime I ring they give me different answers regarding vehicle age.	Comment noted.
I think all Hackney carriages should be wheelchair accessible. I'm a wheelchair user and have been unable to get a taxi in Huddersfield Town centre on a number of occasions because of my wheelchair	Comment noted.
The vehicle licence should be extended to 15 years	Comment noted.
The provision of a fire extinguisher in a private hire vehicle should be optional for the driver. In a forum session with licensed drivers, experienced drivers of 25 years or more said they had never needed to use the extinguisher. Some drivers highlighted that the extinguisher could also be used as a weapon against them. Drivers also said they did not feel comfortable having a fire extinguisher in the vehicle and would prefer to enlist professional help in an emergency. We believe that drivers should not be expected to firefight and should instead call 999 and await the Fire Service. We agree with the National Fire Chief's Council that if a licensing authority elects not to require drivers to undertake training on the safe way to tackle a vehicle fire, vehicles should not be required to carry fire extinguishers	Comment noted.



Consultation Responses Received Via Email

<b>Comments</b>	<b>Council Response</b>
<p>Hi</p> <p>I understand that there is a consultation happening in regard to taxi licensing. Is it possible please to recommend that taxi drivers are trained as Dementia Friends to enable them to assist vulnerable and often confused people using their services? Dementia Friends training is an hour session and this can be arranged via one of our commissioned services.</p> <p>Thank you for your help in this matter.</p>	<p>Comment does not relate to the vehicle specification policy consultation.</p>
<p>Taxi fares , why have they not gone down After drop in petrol prices</p>	<p>Comment does not relate to the vehicle specification policy consultation.</p>