

**REPORT TO:** Licensing Sub-Committee

**MEETING DATE:** 13 February 2014

**BY:** Depute Chief Executive - Resources and People Services

**SUBJECT:** Age of Taxi Vehicles

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## **1 PURPOSE**

1.1 To advise the Sub-Committee of the responses received to the public consultation launched following the meeting of the Sub-Committee on 14 November 2013.

## **2 RECOMMENDATIONS**

2.1 That the Sub-Committee-

- (i) Consider the terms of the responses attached as an Appendix to this report and the views of the Transportation division as outlined at paragraph 3.7 below.
- (ii) Decide, in the light of the responses received to the consultation, whether to confirm in whole or in part, or to reject, the proposals regarding the Age of Taxi vehicles which were put to the Sub-Committee at the meeting on 14 November 2013, as enumerated at paragraph 3.4 hereof.
- (iii) Authorise the Manager, Licensing, Administration & Democratic Services and such officers as she may appoint to implement any further action required as a result of the decision taken in respect of point (ii) above.

## **3 BACKGROUND**

3.1 In a series of reports to the Sub-Committee between October 2012 and February 2013, consideration was given to a proposal to amend condition 9 of the Council's conditions for taxi licences relative to the age of vehicles. Members will recall that the proposal was to delete the words "prima facie" which then existed in the condition and which were deemed to simply confuse the meaning of the condition.

- 3.2 The proposal was formally advertised and consulted on. Only one objection to the proposal was received within the consultation period. The ELTPHA thereafter submitted a response to the proposals, which was considered at the meeting of the Sub-Committee on 14 February 2013. At that meeting the proposed change to the licensing condition was approved, and, in discussion with the Transportation division, it was agreed that the changes would be implemented on a rolling basis from January 2014 to give the trade time to prepare for the changes which would result.
- 3.3 Following that decision, there has been considerable disquiet within the trade to the implications of this decision. Several meetings were held to discuss matters further. The outcome of this process was that the report submitted to the Sub-Committee on 14 November 2013 put forward proposals to effectively reverse the changes enumerated above.
- 3.4 The proposals put forward were that:
- (i) Condition 9 of the conditions of licence is removed altogether, to the effect that there would no longer be an age limit on the acceptability of vehicles submitted for renewal of licence. Licensing of a vehicle would thereafter be determined purely on the issue of safety/roadworthiness, irrespective of its age.
  - (ii) Testing of vehicles being submitted for renewal of licence be increased from on an annual basis to once every six months once the vehicle has reached an agreed trigger age - currently suggested as 6 years (or 12 years in the case of purpose built vehicles).
  - (iii) Any consequent amendments or alterations required to other licence conditions, and to guidance and procedural notes and information, be adopted as part of this proposed alteration.
- 3.5 At the meeting on 14 November 2013, the Sub-Committee authorised the Licensing section to implement a public consultation on the new proposals. Said consultation was open throughout the latter part of November, December and January, and closed on 29 January 2014. A total of 13 responses were received, and are attached as an Appendix to this report.
- 3.6 The various comments received can be read in the Appendix. A general analysis of the responses reveals the following statistics:-
- (i) Respondents agreed 12-1 that the current age limit should be removed.
  - (ii) Respondents were 7-5 against bringing in a 6 monthly test for older vehicles with one "don't know".
  - (iii) Respondents agreed 7-6 that 6 (12) years was a reasonable trigger age to initiate the more frequent testing.

(iv) Respondents were tied 5-5 with three “don’t know” on the question of whether the principal of twice yearly tests was reasonable.

3.7 The Council’s Transportation division have expressed some concerns regarding resourcing any move to six monthly tests. They are of the view that there will have to be some thought given to the resources within the VPMU. They currently require sub-contractors to do some of the taxi and private hire testing. Given the age of the current fleet this would increase the testing by approx 40% ie 243 tests becomes 345 tests assuming it is two tests per year for over 6 years old and this does not account for additional testing as a result of failures. They ask how would this be paid for? The Act requires that the licensing fee covers the costs of implementation of the licensing regime. Increased costs would logically suggest the need for increased fees.

#### **4 POLICY IMPLICATIONS**

4.1 None. As Licensing Authority, the Council may impose or amend conditions of licence as deemed necessary subject to appropriate consultation.

#### **5 EQUALITIES IMPACT ASSESSMENT**

5.1 This report is not applicable to the well being of equalities groups and an Equalities Impact Assessment is not required.

#### **6 RESOURCE IMPLICATIONS**

6.1 Financial – Increased frequency of vehicle testing will result in increased costs- licence fee levels will require to be reviewed to ensure that such costs continue to be covered by the level of fees imposed.

6.2 Personnel - increased frequency of vehicle testing will have an impact on resources within VPMU in terms of carrying out the additional tests and also within Licensing admin in terms of increased administration required as a result.

6.3 Other – None

#### **7 BACKGROUND PAPERS**

7.1 Reports to the Licensing Sub-Committee dated 11.10.12, 13.12.12, 14.2.13 & 14.11.13

<b>AUTHOR'S NAME</b>	Kirstie MacNeill
<b>DESIGNATION</b>	Manager- Licensing, Administration & Democratic Services
<b>CONTACT INFO</b>	Ian Forrest, Senior Solicitor, x7389
<b>DATE</b>	31.1.14

# Age of Taxi Vehicles Consultation

#1



**COMPLETE**

**Collector:** New Link (Web Link)

**Started:** Wednesday, November 27, 2013 9:52:44 AM

**Last Modified:** Wednesday, November 27, 2013 9:56:08 AM

**Time Spent:** 00:03:24

**IP Address:** 86.148.148.218

## PAGE 2

**Q1: It is proposed that the age limit on the acceptability of vehicles submitted for renewal of license be removed and that the licensing of a vehicle would instead be determined purely on the issue of safety / roadworthiness, irrespective of age. Do you agree with this proposal?** Yes

**Q2: Please use the box below to share any other comments you have on this aspect of the proposal.**

although I would suggest being an ex taxi driver that when taxis are tested for road worthy that the test are robust enough to ensure all are treated equally

## PAGE 3

**Q3: It is proposed that the testing of vehicles being submitted for renewal of licence be increased from once a year to once every six months once the vehicle has reached an agreed trigger age - currently this is suggested as 6 years (or 12 years in case of purpose built vehicles). Do you agree with this proposal?** Yes

**Q4: Do you think the trigger age of 6 years old (12 for purpose built vehicles) is reasonable?** Yes

**Q5: Do you think twice yearly tests for vehicles over 6 years old (12 for purpose built vehicles) is reasonable? - or should tests be more or less frequent?** Yes

**Q6: Please use the box below to share any other comments you have on this aspect of the proposal.** Respondent skipped this question

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**Q7: Please share any other comments you have.** Respondent skipped this question

# Age of Taxi Vehicles Consultation

#2



**COMPLETE**

**Collector:** New Link (Web Link)

**Started:** Friday, November 29, 2013 5:26:21 AM

**Last Modified:** Friday, November 29, 2013 5:48:34 AM

**Time Spent:** 00:22:13

**IP Address:** 86.169.25.5

PAGE 2

**Q1: It is proposed that the age limit on the acceptability of vehicles submitted for renewal of license be removed and that the licensing of a vehicle would instead be determined purely on the issue of safety / roadworthiness, irrespective of age. Do you agree with this proposal?**

No,

If you answered no, please explain why.  
Vehicles of over 6 years of age become less safe due to wear and tear of major components and will have a high mileage on at this point making the engines less efficient. More money will need to be spent on the vehicles to try and keep them on the road at this age to comply with mot / taxi test making this a false economy in real terms and the money used trying to keep these older vehicles roadworthy would be better spent on the cost of purchasing a new safer vehicle.

**Q2: Please use the box below to share any other comments you have on this aspect of the proposal.**

We only need to look around at current operators of taxis in Eastlothian with a fleet of 4 to 6 taxis or more the conditions of many are very poor and it is quite obvious that in this current climate and change of social behaviour that demand for taxis has fell and profits also that means less is being spent on maintenance of fleets. It is time for Eastlothian council to take control as licence issuers and regulators to put more rules in place to reduce the of taxis on the road especially ones in poor condition. Many operators have around 6 taxis which are rarely used and around parked up all over streets within areas of Eastlothian.

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**Q3: It is proposed that the testing of vehicles being submitted for renewal of licence be increased from once a year to once every six months once the vehicle has reached an agreed trigger age - currently this is suggested as 6 years (or 12 years in case of purpose built vehicles). Do you agree with this proposal?**

No

**Q4: Do you think the trigger age of 6 years old (12 for purpose built vehicles) is reasonable?**

Yes

**Q5: Do you think twice yearly tests for vehicles over 6 years old (12 for purpose built vehicles) is reasonable? - or should tests be more or less frequent?**

No,

If you answered 'no', please suggest how often a year you think vehicles over a certain age should be tested  
If the council give in to taxi operators on this rule, older taxis 6 years plus should be tested quarterly as more can go wrong with safety aspects on older vehicles even a week after a test. Let us not forget that taxis are public service vehicles carrying the public and must be safe to do so. Currently all bus and coach operators must have checks similar to an mot every 6 weeks to carry the public safely so what different is a taxi. Even taxis on the road at the present time having had passed a taxi test if these vehicles were to be re submitted let us say 3 months after the test it is guaranteed that faults would be found on a large percentage of them.

## Age of Taxi Vehicles Consultation

**Q6: Please use the box below to share any other comments you have on this aspect of the proposal.**

The council should make the decisions on licensing and stand by their decision. What authority does this show allowing operators appeal decisions on licensing. Once the council make a rule which is right in the interests of public safety it should be put in place and operators who do not like it can make a decision which is right for them after it should they continue in the business or move on. is guaranteed that the operators who object to this rule of replacing older vehicles will be the ones with large fleets of unused and under maintained taxis.

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**Q7: Please share any other comments you have.**

*Respondent skipped this question*

# Age of Taxi Vehicles Consultation

#3



**COMPLETE**

**Collector:** New Link (Web Link)

**Started:** Monday, December 02, 2013 4:47:19 AM

**Last Modified:** Monday, December 02, 2013 5:47:15 AM

**Time Spent:** 00:59:56

**IP Address:** 94.6.181.109

## PAGE 2

**Q1: It is proposed that the age limit on the acceptability of vehicles submitted for renewal of license be removed and that the licensing of a vehicle would instead be determined purely on the issue of safety / roadworthiness, irrespective of age. Do you agree with this proposal?**

Yes

**Q2: Please use the box below to share any other comments you have on this aspect of the proposal.**

*Respondent skipped this question*

## PAGE 3

**Q3: It is proposed that the testing of vehicles being submitted for renewal of licence be increased from once a year to once every six months once the vehicle has reached an agreed trigger age - currently this is suggested as 6 years (or 12 years in case of purpose built vehicles). Do you agree with this proposal?**

No

**Q4: Do you think the trigger age of 6 years old (12 for purpose built vehicles) is reasonable?**

No,

If you answered 'no', please suggest an alternative  
How can a taxi of 11 years old with a 400000 mls on the clock have 1 test a year where a private hire with 120000 6 years old will have to take 2 tests a year. Do the committee think a private hire car or bus will do more mls than a taxi that is on the road 24/7 I do not think so. Edinburgh has private hire cars 14 years old with 1 test a year this 6 years and 2 tests makes no sense at all.

**Q5: Do you think twice yearly tests for vehicles over 6 years old (12 for purpose built vehicles) is reasonable? - or should tests be more or less frequent?**

No,

If you answered 'no', please suggest how often a year you think vehicles over a certain age should be tested  
It should be same as taxis.

**Q6: Please use the box below to share any other comments you have on this aspect of the proposal.**

*Respondent skipped this question*

## PAGE 4

**Q7: Please share any other comments you have.**

*Respondent skipped this question*



# Age of Taxi Vehicles Consultation

#4



**COMPLETE**

**Collector:** New Link (Web Link)

**Started:** Monday, December 02, 2013 9:44:15 AM

**Last Modified:** Monday, December 02, 2013 9:49:13 AM

**Time Spent:** 00:04:58

**IP Address:** 81.135.0.132

## PAGE 2

**Q1: It is proposed that the age limit on the acceptability of vehicles submitted for renewal of license be removed and that the licensing of a vehicle would instead be determined purely on the issue of safety / roadworthiness, irrespective of age. Do you agree with this proposal?**

Yes

**Q2: Please use the box below to share any other comments you have on this aspect of the proposal.**

*Respondent skipped this question*

## PAGE 3

**Q3: It is proposed that the testing of vehicles being submitted for renewal of licence be increased from once a year to once every six months once the vehicle has reached an agreed trigger age - currently this is suggested as 6 years (or 12 years in case of purpose built vehicles). Do you agree with this proposal?**

Yes

**Q4: Do you think the trigger age of 6 years old (12 for purpose built vehicles) is reasonable?**

Yes

**Q5: Do you think twice yearly tests for vehicles over 6 years old (12 for purpose built vehicles) is reasonable? - or should tests be more or less frequent?**

Yes

**Q6: Please use the box below to share any other comments you have on this aspect of the proposal.**

*Respondent skipped this question*

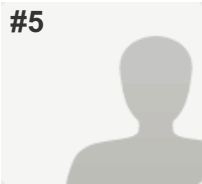
## PAGE 4

**Q7: Please share any other comments you have.**

*Respondent skipped this question*

# Age of Taxi Vehicles Consultation

#5



**COMPLETE**

**Collector:** New Link (Web Link)

**Started:** Tuesday, December 03, 2013 1:43:51 AM

**Last Modified:** Tuesday, December 03, 2013 2:02:03 AM

**Time Spent:** 00:18:11

**IP Address:** 92.4.11.33

## PAGE 2

**Q1: It is proposed that the age limit on the acceptability of vehicles submitted for renewal of license be removed and that the licensing of a vehicle would instead be determined purely on the issue of safety / roadworthiness, irrespective of age. Do you agree with this proposal?**

Yes

**Q2: Please use the box below to share any other comments you have on this aspect of the proposal.**

*Respondent skipped this question*

## PAGE 3

**Q3: It is proposed that the testing of vehicles being submitted for renewal of licence be increased from once a year to once every six months once the vehicle has reached an agreed trigger age - currently this is suggested as 6 years (or 12 years in case of purpose built vehicles). Do you agree with this proposal?**

No

**Q4: Do you think the trigger age of 6 years old (12 for purpose built vehicles) is reasonable?**

No,

If you answered 'no', please suggest an alternative I think private hire should be the same as purpose built taxis-if vehicles pass ELC Test the age rule should be the same for both.

**Q5: Do you think twice yearly tests for vehicles over 6 years old (12 for purpose built vehicles) is reasonable? - or should tests be more or less frequent?**

Don't know / not sure

**Q6: Please use the box below to share any other comments you have on this aspect of the proposal.**

If vehicles pass taxi tests then can,t see reason for age limit,also-can,t work out why purpose built taxis have 12yrs limit+private hire 6yrs.If this could be explained maybe,could try and understand the rule?

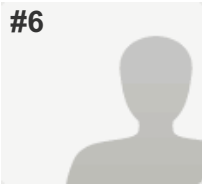
## PAGE 4

**Q7: Please share any other comments you have.**

*Respondent skipped this question*

# Age of Taxi Vehicles Consultation

#6



**COMPLETE**

**Collector:** New Link (Web Link)

**Started:** Wednesday, December 11, 2013 12:54:27 PM

**Last Modified:** Wednesday, December 11, 2013 1:25:04 PM

**Time Spent:** 00:30:37

**IP Address:** 89.241.164.195

PAGE 2

**Q1: It is proposed that the age limit on the acceptability of vehicles submitted for renewal of license be removed and that the licensing of a vehicle would instead be determined purely on the issue of safety / roadworthiness, irrespective of age. Do you agree with this proposal?**

Yes

**Q2: Please use the box below to share any other comments you have on this aspect of the proposal.**

*Respondent skipped this question*

PAGE 3

**Q3: It is proposed that the testing of vehicles being submitted for renewal of licence be increased from once a year to once every six months once the vehicle has reached an agreed trigger age - currently this is suggested as 6 years (or 12 years in case of purpose built vehicles). Do you agree with this proposal?**

Yes

**Q4: Do you think the trigger age of 6 years old (12 for purpose built vehicles) is reasonable?**

No,

If you answered 'no', please suggest an alternative I think that vehicles should all have the same trigger age whether purpose built or not. Surely it's not the class of vehicle, it is the maintenance and overall condition that must take priority.

**Q5: Do you think twice yearly tests for vehicles over 6 years old (12 for purpose built vehicles) is reasonable? - or should tests be more or less frequent?**

Don't know / not sure,

If you answered 'no', please suggest how often a year you think vehicles over a certain age should be tested  
Twice yearly tests would be agreeable as long as there would be no increase in the licensing fee. would it be acceptable for a car to be full tested once a year with a part test at the 6 month stage?

**Q6: Please use the box below to share any other comments you have on this aspect of the proposal.**

It would it be acceptable for a car to be full tested once a year with a part test at the 6 month stage? How will the licensing then be worked, will we only be issued with a 6 month licence? Surely these aspects need to be consulted to the operators in more detail prior to any proposal being passed.

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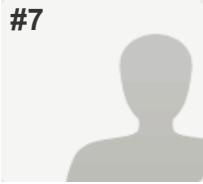
## Age of Taxi Vehicles Consultation

### **Q7: Please share any other comments you have.**

The costs of running have increased significantly since our last fare increase and to place the extra burden of additional charges for licensing onto the operators is totally unacceptable. Who will pay for the extra manpower required to carry out these extra tests, surely as the council as are proposing this the costs must be absorbed by them. As a small operator we are struggling to make ends meet as it is with increasing licenses being issued, not extra rank spaces being provided and the increase in fuel, insurance and repair costs. How many taxis does East Lothian actually need? When was the last time that a survey was done to see what the demand was? Surely the council have a duty to help local businesses survive. If there are too many license premises or takeaways the licenses are refused, how about having a look at the taxi trade and ways to protect our income.

# Age of Taxi Vehicles Consultation

#7



**COMPLETE**

**Collector:** New Link (Web Link)

**Started:** Monday, December 16, 2013 3:50:05 AM

**Last Modified:** Monday, December 16, 2013 4:15:36 AM

**Time Spent:** 00:25:30

**IP Address:** 86.167.244.131

## PAGE 2

**Q1: It is proposed that the age limit on the acceptability of vehicles submitted for renewal of license be removed and that the licensing of a vehicle would instead be determined purely on the issue of safety / roadworthiness, irrespective of age. Do you agree with this proposal?**

Yes

**Q2: Please use the box below to share any other comments you have on this aspect of the proposal.**

*Respondent skipped this question*

## PAGE 3

**Q3: It is proposed that the testing of vehicles being submitted for renewal of licence be increased from once a year to once every six months once the vehicle has reached an agreed trigger age - currently this is suggested as 6 years (or 12 years in case of purpose built vehicles). Do you agree with this proposal?**

No

**Q4: Do you think the trigger age of 6 years old (12 for purpose built vehicles) is reasonable?**

Yes

**Q5: Do you think twice yearly tests for vehicles over 6 years old (12 for purpose built vehicles) is reasonable? - or should tests be more or less frequent?**

No,

If you answered 'no', please suggest how often a year you think vehicles over a certain age should be tested  
I think that 2 tests per year would put a lot of pressure on east Lothian councils testing station . At the moment we are toiling to get test dates and re-test dates . There is also a wait for meter re-test as well . I think that the best way forward and the cheapest way to save putting up the costs to the public would be to have a mot at the six month interval and a walk round test by the cab inspector and if any faults are found by the cab inspector the license holder could be given reasonable time to get any problems fixed and a small charge should be made for the re-visit to the cab inspector .

**Q6: Please use the box below to share any other comments you have on this aspect of the proposal.**

*Respondent skipped this question*

## PAGE 4

**Q7: Please share any other comments you have.**

The council has a duty of care to the general public in both respects here .

1. To make sure that the taxis / private hire cars are fit and safe for the purpose of carrying clients / public .
- 2 . That the costs are kept to a level that does not have to be passed onto the general public.

# Age of Taxi Vehicles Consultation

#8



**COMPLETE**

**Collector:** New Link (Web Link)

**Started:** Monday, December 16, 2013 5:18:04 AM

**Last Modified:** Monday, December 16, 2013 5:19:27 AM

**Time Spent:** 00:01:23

**IP Address:** 31.54.251.240

## PAGE 2

**Q1: It is proposed that the age limit on the acceptability of vehicles submitted for renewal of license be removed and that the licensing of a vehicle would instead be determined purely on the issue of safety / roadworthiness, irrespective of age. Do you agree with this proposal?**

Yes

**Q2: Please use the box below to share any other comments you have on this aspect of the proposal.**

*Respondent skipped this question*

## PAGE 3

**Q3: It is proposed that the testing of vehicles being submitted for renewal of licence be increased from once a year to once every six months once the vehicle has reached an agreed trigger age - currently this is suggested as 6 years (or 12 years in case of purpose built vehicles). Do you agree with this proposal?**

Don't know / not sure

**Q4: Do you think the trigger age of 6 years old (12 for purpose built vehicles) is reasonable?**

Yes

**Q5: Do you think twice yearly tests for vehicles over 6 years old (12 for purpose built vehicles) is reasonable? - or should tests be more or less frequent?**

Don't know / not sure

**Q6: Please use the box below to share any other comments you have on this aspect of the proposal.**

*Respondent skipped this question*

## PAGE 4

**Q7: Please share any other comments you have.**

*Respondent skipped this question*

# Age of Taxi Vehicles Consultation

#9



**COMPLETE**

**Collector:** New Link (Web Link)

**Started:** Monday, December 16, 2013 9:02:51 AM

**Last Modified:** Monday, December 16, 2013 9:26:58 AM

**Time Spent:** 00:24:07

**IP Address:** 92.4.0.142

PAGE 2

**Q1: It is proposed that the age limit on the acceptability of vehicles submitted for renewal of license be removed and that the licensing of a vehicle would instead be determined purely on the issue of safety / roadworthiness, irrespective of age. Do you agree with this proposal?**

Yes

**Q2: Please use the box below to share any other comments you have on this aspect of the proposal.**

It is common sense that the age of the vehicle may have very little bearing on the roadworthiness of any particular vehicle.

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**Q3: It is proposed that the testing of vehicles being submitted for renewal of licence be increased from once a year to once every six months once the vehicle has reached an agreed trigger age - currently this is suggested as 6 years (or 12 years in case of purpose built vehicles). Do you agree with this proposal?**

No

**Q4: Do you think the trigger age of 6 years old (12 for purpose built vehicles) is reasonable?**

No,

If you answered 'no', please suggest an alternative  
The examiner should be qualified enough to have the final say on whether any vehicle requires an intermediate test between the statutory annual test

**Q5: Do you think twice yearly tests for vehicles over 6 years old (12 for purpose built vehicles) is reasonable? - or should tests be more or less frequent?**

Yes,

If you answered 'no', please suggest how often a year you think vehicles over a certain age should be tested  
Refer to previous answer

**Q6: Please use the box below to share any other comments you have on this aspect of the proposal.**

If a 6month test is required an M.O.T. certificate along with a visual check should suffice and a nominal fee should be charged only. The current economic climate must be considered although i am not suggesting safety should be compromised and any reputable m.o.t. must therefor be acceptable.

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**Q7: Please share any other comments you have.**

*Respondent skipped this question*

# Age of Taxi Vehicles Consultation

#10



**COMPLETE**

**Collector:** New Link (Web Link)

**Started:** Thursday, December 19, 2013 9:56:49 AM

**Last Modified:** Thursday, December 19, 2013 9:58:12 AM

**Time Spent:** 00:01:22

**IP Address:** 82.132.220.10

## PAGE 2

**Q1: It is proposed that the age limit on the acceptability of vehicles submitted for renewal of license be removed and that the licensing of a vehicle would instead be determined purely on the issue of safety / roadworthiness, irrespective of age. Do you agree with this proposal?**

Yes

**Q2: Please use the box below to share any other comments you have on this aspect of the proposal.**

*Respondent skipped this question*

## PAGE 3

**Q3: It is proposed that the testing of vehicles being submitted for renewal of licence be increased from once a year to once every six months once the vehicle has reached an agreed trigger age - currently this is suggested as 6 years (or 12 years in case of purpose built vehicles). Do you agree with this proposal?**

Yes

**Q4: Do you think the trigger age of 6 years old (12 for purpose built vehicles) is reasonable?**

Yes

**Q5: Do you think twice yearly tests for vehicles over 6 years old (12 for purpose built vehicles) is reasonable? - or should tests be more or less frequent?**

Yes

**Q6: Please use the box below to share any other comments you have on this aspect of the proposal.**

*Respondent skipped this question*

## PAGE 4

**Q7: Please share any other comments you have.**

*Respondent skipped this question*



# Age of Taxi Vehicles Consultation

#11



**COMPLETE**

**Collector:** New Link (Web Link)

**Started:** Friday, December 20, 2013 2:44:45 AM

**Last Modified:** Friday, December 20, 2013 2:51:33 AM

**Time Spent:** 00:06:48

**IP Address:** 79.64.91.25

PAGE 2

**Q1: It is proposed that the age limit on the acceptability of vehicles submitted for renewal of license be removed and that the licensing of a vehicle would instead be determined purely on the issue of safety / roadworthiness, irrespective of age. Do you agree with this proposal?**

Yes

**Q2: Please use the box below to share any other comments you have on this aspect of the proposal.**

I used to own and drive my own private hire car and was very impressed with the inspection team at Macmerry. As long as they are inspecting vehicles regularly, I see no problem in removing the age limit on license renewal. The standards are very clear to all owners and should be applied to their vehicles as a minimum.

Rgds.

L A Cairney

PAGE 3

**Q3: It is proposed that the testing of vehicles being submitted for renewal of licence be increased from once a year to once every six months once the vehicle has reached an agreed trigger age - currently this is suggested as 6 years (or 12 years in case of purpose built vehicles). Do you agree with this proposal?**

Yes

**Q4: Do you think the trigger age of 6 years old (12 for purpose built vehicles) is reasonable?**

Yes

**Q5: Do you think twice yearly tests for vehicles over 6 years old (12 for purpose built vehicles) is reasonable? - or should tests be more or less frequent?**

Yes

**Q6: Please use the box below to share any other comments you have on this aspect of the proposal.**

*Respondent skipped this question*

PAGE 4

**Q7: Please share any other comments you have.**

*Respondent skipped this question*

# Age of Taxi Vehicles Consultation

#12



**COMPLETE**

**Collector:** New Link (Web Link)

**Started:** Monday, December 23, 2013 10:36:37 AM

**Last Modified:** Monday, December 23, 2013 10:59:13 AM

**Time Spent:** 00:22:36

**IP Address:** 151.229.199.79

## PAGE 2

**Q1: It is proposed that the age limit on the acceptability of vehicles submitted for renewal of license be removed and that the licensing of a vehicle would instead be determined purely on the issue of safety / roadworthiness, irrespective of age. Do you agree with this proposal?**

Yes

**Q2: Please use the box below to share any other comments you have on this aspect of the proposal.**

*Respondent skipped this question*

## PAGE 3

**Q3: It is proposed that the testing of vehicles being submitted for renewal of licence be increased from once a year to once every six months once the vehicle has reached an agreed trigger age - currently this is suggested as 6 years (or 12 years in case of purpose built vehicles). Do you agree with this proposal?**

No

**Q4: Do you think the trigger age of 6 years old (12 for purpose built vehicles) is reasonable?**

No,

If you answered 'no', please suggest an alternative Purpose built vehicles are normally heavily used and therefore would require more testing than vehicles for example that are used only for school runs who only do approximately 10-12k miles per year. The mileage of a vehicle must be taken into consideration.

**Q5: Do you think twice yearly tests for vehicles over 6 years old (12 for purpose built vehicles) is reasonable? - or should tests be more or less frequent?**

No,

If you answered 'no', please suggest how often a year you think vehicles over a certain age should be tested Vehicles up to 10 years old to be tested once a year, older than that twice a year. Again mileage and condition should be considered.

**Q6: Please use the box below to share any other comments you have on this aspect of the proposal.**

At present a vehicle is MOT before the test inspection which is 2 thorough checks, if the vehicle wasn't deemed suitable the owner would be told. This system has worked fine in the past. I would imagine that most operators change their vehicles every 5 years for purpose built and 7 years for private hire. Depending on condition and mileage. Vehicles that are used for school runs only and do very little mileage maybe get changed on approximately the 10 year mark.

## PAGE 4

**Q7: Please share any other comments you have.**

*Respondent skipped this question*

# Age of Taxi Vehicles Consultation

#13



**COMPLETE**

**Collector:** New Link (Web Link)

**Started:** Friday, January 10, 2014 2:10:54 AM

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## PAGE 2

**Q1: It is proposed that the age limit on the acceptability of vehicles submitted for renewal of license be removed and that the licensing of a vehicle would instead be determined purely on the issue of safety / roadworthiness, irrespective of age. Do you agree with this proposal?**

Yes

**Q2: Please use the box below to share any other comments you have on this aspect of the proposal.**

*Respondent skipped this question*

## PAGE 3

**Q3: It is proposed that the testing of vehicles being submitted for renewal of licence be increased from once a year to once every six months once the vehicle has reached an agreed trigger age - currently this is suggested as 6 years (or 12 years in case of purpose built vehicles). Do you agree with this proposal?**

No

**Q4: Do you think the trigger age of 6 years old (12 for purpose built vehicles) is reasonable?**

No,

If you answered 'no', please suggest an alternative  
All cars are not all same some will be able to work fine at the suggested ages some not. If they are fit for purpose they should be allowed to work this would be determined by the taxi test and mot

**Q5: Do you think twice yearly tests for vehicles over 6 years old (12 for purpose built vehicles) is reasonable? - or should tests be more or less frequent?**

No,

If you answered 'no', please suggest how often a year you think vehicles over a certain age should be tested  
I would suggest that the vehicle would have an mot every 6 months to make sure that the vehicle is roadworthy maybe with a few trusted stations suggested by elc and cedrt to be recorded. This would also put no added pressure of work at the testing station at macmerry who are often struggling to fit in taxis at the moment along with all the other work schedule that they have.

**Q6: Please use the box below to share any other comments you have on this aspect of the proposal.**

*Respondent skipped this question*

## PAGE 4

**Q7: Please share any other comments you have.**

*Respondent skipped this question*