

Appendix B

Officer response to consultation response received

Appendix Letter/ Document Number	Para. No.	Included in Revised Policy [Y/N or In Part]	Officer Comments Explanatory Notes
Doc 1	1	N	Comment is outside the remit of this Policy
	2	N	Knowledge Test is already part of the Policy and covers the Administrative Area of Shropshire Council
	3	N	Removal of the emissions requirements directly conflicts with the Councils Public Health Outcomes Framework and the requirement to improve air quality
	4	N	Comment noted
	5	N	Comments noted – all comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
	6	N	The Deregulation Act 2015 allows for cross border hiring in relation to private hire drivers, vehicles and operators. Appendix K is the Intended Use section of the Policy which sets out how the Council deals with Hackney Carriage Vehicles and drivers.
	7	N	Comment noted but the law allows for drivers to work for multiple operators.
Doc 2	1	In Part	The consultee has not made it clear which sections of the Policy they are referring to. Officers note that the Policy has an age and MOT requirement. Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 3	1	In Part	Policy has been amended to increase the age requirements for hybrid petrol vehicles.
Doc 4	1	In Part	Policy has been amended to increase the age requirements for hybrid petrol vehicles.
Doc 5	1	N	Comments noted

Doc 6	1	In Part	Policy has been amended to increase the age requirements for hybrid petrol vehicles.
Doc 7	1 to 3	Y	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 7	4	In Part	Policy has been amended to increase the age requirements for hybrid petrol vehicles.
Doc 8	1	Y	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 9	1	Y	Comments regarding age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 10	1	N	Policy document provides clarity on how an applicant can demonstrate an executive business model to qualify for the exemption under Section 75 of the Local Government (Miscellaneous Provisions) Act 1976. The Council's view is that an executive private hire vehicle must only be used for an executive service, for example business to business contracts. There is no proposed provision to allow for vehicles to operate as both an executive and standard private hire vehicle under the same licence.
Doc 11	1	In Part	Policy has been amended to increase the age requirements for hybrid petrol vehicles.
Doc 12	1	Y	Comments regarding age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 13	1	Y	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 14	1 - 12	Y	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 14	13 - 23	Y	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 14	24	N	Comment noted – response falls outside the remit of this consultation
Doc 15	1	N	Comment noted – response falls outside the remit of this consultation
Doc 16	1 - 3	N	Comments noted
Doc 16	4 - 5	Y	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.

Doc 16	6 – 7	N	Comments noted
Doc 16	8	N	Comments noted - The proposed policy does not prohibit an applicant from applying to licence an M2 vehicle. However, the applicant would be required to provide proof that the M2 vehicle being applied for has one of the three conversion certificates as listed in the proposed policy, i.e. VCA, IAC or IVA 6.
Doc 16	9	Y	Supporting comment – for not allowing Cat S vehicles to be licenced
Doc 16	10	In Part	A new paragraph has been inserted to set out the documentary requirements for a vehicle to be licenced after an accident across all vehicle sections of the Policy.
Doc 16	11	In Part	MOT Garages are VOSA approved and should be working to the same standards set out by VOSA. Consideration will be given to enhance the vehicle compliance check undertaken by the Licensing Team which will include aesthetic standards of the interior and exterior of the vehicle.
Doc 16	12	N	The Policy review is set at 4 yearly intervals to ensure it captures changes in legislation but can be reviewed at any time if required.
Doc 16	13	N	Comment noted
Doc 17	1 - 3	N	Comments noted
Doc 17	4 – 5	Y	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 17	6 – 7	N	Comments noted
Doc 17	8	N	Comments noted - The proposed policy does not prohibit an applicant from applying to licence an M2 vehicle. However, the applicant would be required to provide proof that the M2 vehicle being applied for has one of the three conversion certificates as listed in the proposed policy, i.e. VCA, IAC or IVA 6.
Doc 17	9	Y	Supporting comment – for not allowing Cat S vehicles to be licenced
Doc 17	10	In Part	A new paragraph has been inserted to set out the documentary requirements for a vehicle to be licenced after an accident across all vehicle sections of the Policy.
Doc 17	11	In Part	MOT Garages are VOSA approved and should be working to the same standards set out by VOSA. Consideration will be given to enhance the vehicle compliance check undertaken by the Licensing Team which will include aesthetic standards of the interior and exterior of the vehicle.

Doc 17	12	N	The Policy review is set at 4 yearly intervals to ensure it captures changes in legislation but can be reviewed at any time if required.
Doc 18	1 - 3	N	Comments noted
Doc 18	4 - 5	Y	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 18	6 - 7	N	Comments noted
Doc 18	8	N	Comments noted - The proposed policy does not prohibit an applicant from applying to licence an M2 vehicle. However, the applicant would be required to provide proof that the M2 vehicle being applied for has one of the three conversion certificates as listed in the proposed policy, i.e. VCA, IAC or IVA 6.
Doc 18	9	Y	Supporting comment – for not allowing Cat S vehicles to be licenced
Doc 18	10	In Part	A new paragraph has been inserted to set out the documentary requirements for a vehicle to be licenced after an accident across all vehicle sections of the Policy.
Doc 18	11	In Part	MOT Garages are VOSA approved and should be working to the same standards set out by VOSA. Consideration will be given to enhance the vehicle compliance check undertaken by the Licensing Team which will include aesthetic standards of the interior and exterior of the vehicle.
Doc 18	12	N	The Policy review is set at 4 yearly intervals to ensure it captures changes in legislation but can be reviewed at any time if required.
Doc 19	1	Y	Comments regarding emissions standards have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 20	1 - 7	In Part	Appendix M, Paragraph 1.2 has been amended to provide further clarity in the use of trailers.
Doc 20	8 - 15	Y	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 21	1 - 3	Y	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 21	4	In Part	A new paragraph has been inserted to set out the documentary requirements for a vehicle to be licenced after an accident across all vehicle sections of the Policy.
Doc 21	5	N	Comment noted

Doc 21	6	N	Comment noted
Doc 22	1	N	The Policy review is set at 4 yearly intervals to ensure it captures changes in legislation but can be reviewed at any time if required.
Doc 22	2	In Part	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 22	3	Y	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 22	4	N	Additional MOT checks are required to ensure the continued safety of vehicles.
Doc 22	5	Y	Policy amended to allow Category S vehicles to be licenced providing they have been subject to a new basic voluntary IVA check and a valid IVA 6 provided.
Doc 22	6	N	N1 vehicles are light goods vehicles and are not built to carry passengers therefore it is not possible for the N1 vehicles to undergo an IVA safety check? the policy sets out the Councils position with regards to M2 and N1 vehicles. The proposed policy does not prohibit an applicant from applying to licence an M2 or N1 vehicle. However, the applicant would be required to provide proof that the M2 or N1 vehicle being applied for has one of the three conversion certificates as listed in the proposed policy, i.e. VCA, IAC or IVA 6.
Doc 23	1 - 3	N	Comments noted
Doc 23	4 – 6	Y	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 23	7	N	Comments noted
Doc 23	8	Y	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 23	9	N	Comments noted
Doc 23	10	N	Comments noted
Doc 23	11	N	Comments noted - The proposed policy does not prohibit an applicant from applying to licence an M2 vehicle. However, the applicant would be required to provide proof that the M2 vehicle being applied for has one of the three conversion certificates as listed in the proposed policy, i.e. VCA, IAC or IVA 6.
Doc 23	12	N	Comments noted
Doc 23	13	Y	Supporting comment – for not allowing Cat S vehicles to be licenced
Doc 23	14	Y	Policy amended to allow Category S vehicles to be licenced providing they have

			been subject to a new basic voluntary IVA check and a valid IVA 6 provided.
Doc 23	15	N	Comments noted – continual review of the time it takes to process paperwork following an accident notification is undertaken to improve the service.
Doc 23	16	N	The Policy review is set at 4 yearly intervals to ensure it captures changes in legislation but can be reviewed at any time if required.
Doc 24	1	N	Comments noted – licensing fees fall outside the remit of this policy
Doc 24	2	N	Comments noted
Doc 24	3 - 4	In Part	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 24	5	N	5 Star NCAP Safety Rating has been in existence since 2001 and is an established measure for the safety of vehicles. Officers consider this the appropriate means for assessing the safety of licenced vehicles and the protection of the public.
Doc 24	6	N	Comments noted - Officers note that this does not cause an unnecessary burden as proprietors are encouraged rather than it being compulsory to have hackney carriages that are black or private hire vehicles that are any colour other than black.
Doc 24	7	N	Proprietors of wheelchair accessible vehicles suggested that if the Council provided a longer period for which they could licence their vehicles this would improve their financial position. Therefore, a separate age/emissions chart has been included in the revised policy in support of this request.
Doc 24	8	N	It is not clear what the consultee is specifically referring to as the current Policy provides for applicants to complete the Councils road safety and driving ability test (driving assessment) or to provide a current advanced motorist qualification. Officers consider that applicants to become a professional driver should be required to evidence a higher standard of driving ability.
Doc 24	9	N	The Statutory Taxi and Private Hire Vehicle Standards requires all licenced drivers to have safeguarding training. To ensure that applicants and licenced drivers fully understand their safeguarding responsibilities the Council considers that this should be undertaken in an environment where applicants have the opportunity to ask questions and interact with their trainer.
Doc 24	10	Y	The Policy has been amended to remove the examples of unacceptable dress

			code.
Doc 24	11	N	The medical standards adopted by the Council are set out in the DVLA Group 2 medical standards which all applicants and licenced drivers are required to meet.
Doc 24	12	N	Comment is outside the remit of this Policy; the Council's Constitution sets out how the delegation of licensing matters are dealt with.
Doc 25	1 to 129	Summary of final action points are at paragraph 130 below	Notes from the Taxi Forum held on 18 August 2022 attended by 6 Private Hire Drivers/Operators and 10 Hackney Carriage Proprietors, all questions considered, and a summary of the action points is below in paragraph 130 (1) to 130 (6)
Doc 25	130 (1)	Y	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 25	130 (2)	Y	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 25	130 (3)	Y	A new paragraph has been inserted to set out the documentary requirements for a vehicle to be licenced after an accident across all vehicle sections of the Policy.
Doc 25	130 (4)	N	Comment is outside the scope of this policy. However, a trade update was sent out to the Trade on the 19 August 2022 to provide information on the progress.
Doc 25	130 (5)	Y	The revised Safeguarding course offer as part of this policy will include notes to be taken away.
Doc 25	130 (6)	N	Comment is outside the scope of this policy. However, a programme of enforcement is scheduled throughout the year with the Out of Hours Team, VOSA and West Mercia Police.
Doc 25	131	N	Comment is outside the scope of this policy and is part of an update for the Trade on the separate consultation to do with the Hackney Carriage Table of Fares.
Doc 25	132 to 133	Y	Consultee has requested direct contact and clarification which will be provided separately. However, Paragraphs 3b.110 and 3b.111 have been amended to provide further clarity.
Doc 26	1	N	The purpose of paragraph 1.2 is to set out the Councils position in relation to ensuring applicants and existing licence holders are alerted to specific areas

			where attention should be applied and forms part of the guidance for perspective and existing licence holders.
Doc 26	2	Y	The policy has been amended to include the Taxi and Private Hire Vehicles (Disabled Persons) Act 2022.
Doc 26	3	Y	The policy has been amended to incorporate the consultees comment.
Doc 26	4	In Part	Paragraph 2.2 of the policy has been amended to include the words 'in nature'.
Doc 26	5	Y	Paragraph 2.12 of the policy has been amended to include the words 'drivers licence'.
Doc 26	6	N	Paragraph 2.13 of the policy is not intended to describe where the burden of proof lies.
Doc 26	7	In Part	A new paragraph in has been inserted Part 2 to clarify the definition of applicant.
Doc 26	8	Y	Paragraph 2.18 has been amended to include the consultees comment.
Doc 26	9	In Part	A new paragraph in has been inserted Part 2 to clarify the definition of applicant.
Doc 26	10	N	Paragraphs 1.9 and 2.9 contain references to the Taxis and Private Hire Vehicles (Safeguarding and Road Safety) Act 2022 contrary to the consultees comment.
Doc 26	11	N	Comment noted - The Policy is designed to put the Council's licensing requirements into context in accordance with relevant legislation. It is not the intention of the Policy to outline every section of the legislation. Furthermore, the proposed policy sets out how the Council will deal with any safeguarding or road safety concerns.
Doc 26	12	N	Comment noted
Doc 26	13	Y	Paragraph 3.5, first bullet point has been amended to include the DBS standard and the criteria to which it is applied for under.
Doc 26	14	Y	Paragraphs 3.6, 3a.31 and 3a.35 have been amended to include 'issue date'.
Doc 26	15	Y	Paragraph 3a.5 amended to include the words 'Unless already signed up to the DBS update service'.
Doc 26	16	N	The Policy includes the requirements as set out in the Statutory Taxi and Private Hire Vehicle Standards.
Doc 26	17	In Part	The Policy has been amended to include information on the Tax Check requirements. This applies to drivers and operator new and renewal applications.
Doc 26	18	In Part	The Policy has been amended to include information on the Tax Check

			requirements. This applies to drivers and operator new and renewal applications.
Doc 26	19	In Part	The Policy has been amended to include information on the Tax Check requirements. This applies to drivers and operator new and renewal applications.
Doc 26	20	N	Comments noted.
Doc 26	21	N	Comments noted – Officers consider the way the paragraphs are drafted make it clear that an application cannot be determined until all the supporting information listed in the application form has been provided.
Doc 26	22	N	Comments noted – Officers consider the way the paragraphs are drafted make it clear that an application cannot be determined until all the supporting information listed in the application form has been provided.
Doc 26	23	N	Comments noted – the requirements for the applicant are outlined in the application form.
Doc 26	24	N	The Policy has been amended to include information on the Tax Check requirements. This applies to drivers and operator new and renewal applications.
Doc 26	25	N	Officers disagree with comment made. The paragraph provides guidance to applicants regarding submitting a renewal application to ensure an application is received within sufficient time to allow for continuous driving.
Doc 26	26	Y	Paragraph has been amended to include the words ‘Licensing Panel’.
Doc 26	27	N	Comments noted – paragraph amended to provide further clarity based on the guidance (Department for Transport, Access for wheelchair users to Taxis and Private Hire Vehicles – Statutory Guidance uksiod_20170342_en.pdf (legislation.gov.uk))
Doc 26	28	N	Comments noted – officers consider the section on medical exemption applications clearly states that this is in accordance with the Equality Act 2010.
Doc 26	29	N	Comments noted.
Doc 26	30	In Part	Paragraph amended to include the words matters ‘prescribed by statute, byelaws’.
Doc 26	31	N	Officers disagree with the suggestion made by the Consultee. The paragraph is set out within the Main Legal Requirements section of the Policy and provision for ‘not unnecessarily prolonging a journey’ is contained within Section 69 of the

			Local Government (Miscellaneous Provisions) Act 1976.
Doc 26	32	In Part	A footnote has been added to clarify what legislation includes the definition of a 'vehicle tester'.
Doc 26	33	N	Comments noted.
Doc 26	34	Y	Paragraphs 3b.14, 3c.11, 3d.15 and 3e.14 have been amended to take into account the comments made.
Doc 26	35	Y	Paragraphs 3b.15, 3c.12, 3d.16, and 3e.15 and 3f.10 have been amended to take into account the comments made.
Doc 26	36	N	Comments noted – Appendix I provides clarity on how cautions and convictions will be considered.
Doc 26	37	In Part	Comments regarding emissions and age limits have been considered and the Emissions/Age chart has been revised to take into account the comments made.
Doc 26	38	N	Paragraph 3b.32 makes it clear that an existing licenced vehicle which sustains Category S damage must have an IVA to ensure the safety of the vehicle prior to being permitted for the use of Hackney Carriage or Private Hire work.
Doc 26	39	N	Comment noted.
Doc 26	40	N	Officers disagree with the Consultees proposal - Holders of a valid Hackney Carriage and Private Hire drivers' licence or Private Hire Operators Licence are subject to an enhanced DBS or a Basic DBS. The provision for references applies to applicants who do not hold these licences and is used as an additional check to verify the applicant's suitability to hold a licence.
Doc 26	41	N	Comments noted.
Doc 26	42	N	The Council requires applicants to submit a valid MOT test on application to satisfy the requirements of section 48 of the Local Government (Miscellaneous Provisions) Act 1976, namely, to be satisfied that the vehicle is in a suitable mechanical condition. The requirement to submit an MOT will be in accordance with section 50 of the Local Government (Miscellaneous Provisions) Act 1976 and the footnote provides further clarity.
Doc 26	43	Y	Paragraphs 3b.103, 3c.97, 3d.104 and 3e.104 have been amended to take into account the comments made.
Doc 26	44	N	Comments noted

Doc 26	45	N	Comments noted – Paragraph amended to provide further clarity in line with Section 67 Local Government (Miscellaneous) Provisions Act 1976.
Doc 26	46	In Part	Paragraph 3c.28 and 3d.37 have been amended to take into account the comments made.
Doc 26	47	N	The Council's view is that an executive private hire vehicle must only be used for an executive service, for example business to business contracts. There is no proposed provision to allow for vehicles to operate as both an executive and standard private hire vehicle under the same licence.
Doc 26	48	N	Paragraph 3f.8 has not been amended to take into account the comment made.
Doc 26	49	Y	Paragraph 3f.10 has been amended to provide further clarity in line with the comment made.
Doc 26	50	N	Comment noted
Doc 26	51	N	Paragraphs 3f.32 and 3f.42 already contain the information about Tax Checks so no amendments required.
Doc 26	52	N	Comment noted.
Doc 26	53	In Part	Comment noted – Paragraph 4.1 has been amended to provide further clarity Officers note that Part 2, Part 3 and Appendix I already include the information as outlined in the Consultees comment.
Doc 26	54	Y	Paragraph 1.7 has been amended to include 'issue date'.
Doc 26	55	N	The Policy includes the requirements as set out in the Statutory Taxi and Private Hire Vehicle Standards.
Doc 26	56	N	Comment noted
Doc 26	57	N	Comment noted – Officers have considered the cases referred to in the submission and do not consider that any amendments to Appendix B 1.18 or Appendix H are required.
Doc 26	58	N	It is not clear what the consultee is specifically referring to because Paragraph 1.24 of Appendix B does not relate to Paragraph 3a.49.
Doc 26	59	Y	Paragraph 1.34 has been amended to take into account the Consultees comment. Paragraph 1.36 has been moved to the Part 3 Hackney Carriage Vehicles section of the Policy.
Doc 26	60	Y	Paragraph 1.34 has been further amended to take into account the Consultees comment.

Doc 26	61	N	The Council requires applicants to submit a valid MOT test on application to satisfy the requirements of section 48 of the Local Government (Miscellaneous Provisions) Act 1976, namely, to be satisfied that the vehicle is in a suitable mechanical condition. The requirement to submit an MOT will be in accordance with section 50 of the Local Government (Miscellaneous Provisions) Act 1976.
Doc 26	62	N	Comments noted
Doc 26	63	N	Comments noted
Doc 26	64	Y	Paragraph 1.100 has been amended to take into account the Consultees Comments.
Doc 26	65	N	Comments noted
Doc 26	66	N	Comments noted