
To: Regulatory Functions Board

On: 5 September 2019

Report by: Director of Finance and Resources

Heading: Taxi and Private Hire Car Specification: Proposals for Consultation

1. Summary

- 1.1 The purpose of this report is to advise the Board of a review by officers of the Council's vehicle specification for taxis and private hire cars and to seek approval of proposed revised specifications for these vehicles for the purpose of consultation.
- 1.2 The report also seeks the Board's approval to consult on a proposal to increase the current number of passengers able to be carried in suitable wheelchair accessible taxis and private hire cars, from seven to eight.
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2. Recommendations

- 2.1 Approve the terms of the proposed revised condition in relation to taxi licences set out at Appendix 1, as suitable for the purposes of consultation;
- 2.2 Approve the terms of the proposed revised condition in relation to private hire car licences set out at Appendix 2, as suitable for the purposes of consultation;

- 2.3 Approve the consultation questions at Appendix 3;
 - 2.4 Agree to consult on a proposal that wheelchair accessible MPVs to be licensed as taxis or private hire cars, which are suitable for the carriage of eight passengers, may be licensed to carry a maximum of eight passengers; and
 - 2.5 Instruct officers to undertake a public consultation on the proposed conditions at Appendices 1 and 2 and the questions at Appendix 3, to include all taxi and private hire car licence holders in Renfrewshire, representatives of those licence holders, Renfrewshire Access Panel, relevant Council Services and such other persons or groups as officers consider appropriate; and to report the responses to the consultation to the Board thereafter.
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3. **Background**

- 3.1 In terms of the Civic Government (Scotland) Act 1982, section 10(2), the Council as licensing authority requires to be satisfied that a taxi or private hire car to be licensed is suitable in type, size and design for use as a taxi or private hire car, as the case may be, and is safe for that use.
- 3.2 The Council as licensing authority is therefore entitled to determine the suitability of vehicles for use as a taxi or private hire car and to develop a policy in this regard. The Council's existing standards for taxis and private hire cars were agreed in 1998, on the basis they would fully take effect in 2002, to include requirements on wheelchair accessibility, particularly in relation to taxis. The requirement for wheelchair accessibility in respect of taxis was the subject of legal challenge and as such the policy was not fully implemented until around 2010.
- 3.3 The Council's current requirements are contained in condition 22 of the Council's standard conditions for taxis and condition 1 of the standard conditions for private hire cars. These conditions are in the following terms:

Taxis

- 3.3.1 "22. The holder of a taxi licence shall use as a taxi only custom built taxis or any other vehicle of a type which has received the prior approval of the Licensing Authority. All vehicles licensed as taxis shall:-
 - (i) be coloured white;

(ii) be wheelchair accessible and either custom built taxis or alternatively multi person vehicles (MPVs) of a type approved by the Licensing Authority;

(iii) be less than 8 years from the date of the first registration of the vehicle where that vehicle is wheelchair accessible and should otherwise be less than 7 years old. Vehicles shall be taken out of service and replaced when they become 8 years old/ 7 years old from the date of first registration respectively; and

(iv) be subject to 6 monthly inspections as from the time they are 5 years old from the date of first registration.”

Private Hire Cars

3.3.2 “1. The holder of a private hire car licence shall use as a private hire car, a four door saloon, a five door hatchback or estate vehicle with a minimum width across the back seat of 48 inches or alternatively a multi person vehicle (MPV) of a type approved by the Licensing Authority. All vehicles licensed as private hire cars shall be:

(i) any colour other than white; and

(ii) less than 7 years old from the date of first registration unless the vehicle is a multi person vehicle (MPV) and wheelchair accessible where that vehicle shall be less than 8 years old from the date of first registration. Vehicles shall be taken out of service and replaced when they become 7 years/ 8 years old from the date of first registration respectively;

(iii) be subject to 6 monthly inspections as from the time they are 5 years old from the date of first registration.”

Developments since 2002

3.4 The above conditions have not been substantially reviewed by the Board since, except in that (i) the upper age limit (previously five years) applicable to private hire cars was extended to seven years by the Board on 11th January 2012, and (ii) the previous requirement for a minimum engine capacity (1600cc) was removed by Council on 28th September 2017, when it was also agreed that officers would undertake a comprehensive review of licensing conditions reflecting developments in electric vehicle technology.

- 3.5 In addition, on 27th June 2019, Council agreed to declare a climate emergency, to pledge to work proactively to make Renfrewshire carbon neutral by 2030 and to continue to work with partners and community groups to deliver this goal through all relevant strategies and plans.
- 3.6 Further, there have been a number of developments in the construction of vehicles for use in the taxi and private hire car trades generally. The private hire car conditions currently require a minimum width of 48 inches across the back seat of a vehicle which, taken together with removal of the minimum engine size as stated above, prevented smaller vehicles being licensed as private hire cars at the time the policy was introduced. However, changes to the design of vehicles combined with the removal of the minimum engine size (to recognise the availability of electric and hybrid vehicles and vehicles with more fuel-efficient engines) has resulted in relatively small vehicles being licensed.
- 3.7 Similarly, in relation to taxis, when the policy was introduced the list of wheelchair accessible vehicles considered suitable for licensing contained only three wheelchair accessible MPV types. Over time, this list has expanded significantly, allowing a number of smaller vehicles to be licensed which are only capable of carrying a limited number of additional passengers and associated luggage in addition to a wheelchair passenger. As a result, vehicles which can currently be licensed as taxis and private hire cars may no longer provide sufficient passenger and luggage space to ensure passengers can travel with the level of comfort they should reasonably expect.
- 3.8 In addition, since the Council's policy on wheelchair accessibility was introduced in 2002, there is now a greater general understanding and awareness of accessibility issues, with various other local licensing authorities having agreed policies on wheelchair accessibility and their own criteria for licensing taxis and private hire cars. At the same time, the Council has received enquiries from the taxi and private hire car trades about the possibility of vehicles being licensed for longer than 8 years, in the case of taxis, and 7 years, in the case of private hire cars.
- 3.9 Given all the above factors, it is the view of officers that the Council's existing regulatory standards require to be reviewed, in terms of the vehicles which may be licensed as taxis and private hire cars and the age of these vehicles. Accordingly, Sections 4 and 5 of this report detail further considerations in relation to taxis and private hire cars respectively.

4. Taxis

- 4.1 The Council's Civic Government Enforcement Officer has met regularly with Renfrewshire Access Panel and, as required, with other groups having an interest in accessibility issues, such as Renfrewshire Carers' Service. Renfrewshire Access Panel is supportive of the Council's policy on wheelchair accessibility, which has resulted in approximately 97% of the taxi fleet in Renfrewshire being wheelchair accessible (a small number of exceptions to the policy having been granted to taxi licence holders by the Board, on grounds of disability). However, officers are aware of concerns in relation to the use of dual access ramps for wheelchair access into some vehicles and also in relation to the use of rear-loading taxis, in respect of which a passenger may be loaded from, and unloaded onto, a roadway rather than a pavement. Further information in relation to this is set out at Paragraphs 4.4 to 4.6 of the report.
- 4.2 Further, since the introduction and implementation of the existing policy, there has been considerable progress in the development of more environmentally sustainable vehicles. There are now a number of fully electric or zero emissions vehicles available, including purpose built, wheelchair accessible taxis, with the discontinuation of the diesel or petrol engine counterpart. As fully electric taxis have fewer serviceable parts than diesel or petrol engine vehicles, it may be considered that such vehicles are suitable for a longer licensed use. At present, only a small number of fully electric taxis are operating in Renfrewshire. This may be due to the cost of acquiring them, as the cost of fully electric vehicles is significantly higher than conventionally powered equivalents. The Board may consider that the longer such vehicles can remain in service, the lower the annual depreciation cost will be, as the cost of buying the vehicle would be written off over the licensed life of the vehicle, which would encourage operators to invest in vehicles likely to have a lesser impact on the environment. There is also a prospect that existing operators in Renfrewshire will seek to upgrade their vehicles to lower emissions vehicles in any event, to be able to accept fares into the low emissions zone in Glasgow, which will apply to vehicles such as taxis and private hire cars from 2022.
- 4.3 Having regard to the considerations above, a proposed revised condition of licence for taxis is attached at Appendix 1 for the purposes of consultation. The proposed revised condition would introduce, for the first time, a maximum age (5 years, from the date of the vehicle's first registration) at which vehicles can be first licensed within Renfrewshire. Such an entry requirement for licensed vehicles already exists in some

other Council areas and would prevent a taxi licence holder seeking to license a vehicle in Renfrewshire once it no longer meets the age criteria applicable in another area where the vehicle was previously licensed. As stated at Paragraph 4.2, there is a likelihood in any event that some vehicles will be removed from service in anticipation of the low emission zone in Glasgow being extended to taxis and private hire cars in 2022.

- 4.4 The proposed revised condition at Appendix 1 would allow wheelchair accessible taxis currently licensed as taxis to remain in operation for a period of up to eight years, as under the existing policy. However, the Council has received representations on behalf of wheelchair users, expressing concerns about the use of dual access ramps in the existing taxi fleet for wheelchair entry. These ramps preclude access by some wheelchairs due to the wheel width of those wheelchairs. As a result, as set out in the suggested consultation questions at Appendix 3, it is proposed that the views of consultees are obtained as to whether all wheelchair accessible taxis should require to be equipped with a single solid wheelchair access ramp. It is also proposed that consultees' views are sought as to when such a change might be implemented. It would be possible to apply such a policy to all applications for renewal of taxi licences made following an agreed implementation date, as suggested in the consultation questions at Appendix 3.
- 4.5 Similarly, officers have received comments about the suitability of rear-loading vehicles as wheelchair-accessible taxis. These vehicles are likely to require wheelchair passengers to be loaded into the vehicle from, and unloaded to, a roadway rather than a pavement. When the current policy was introduced in 2002, the list of MPVs suitable as wheelchair-accessible taxis consisted of only a small number of vehicles, most of which were capable of carrying both a wheelchair passenger and other passengers (with associated luggage). Over time, the list of vehicles has been expanded significantly, which has allowed a variety of smaller, rear-loading vehicles to be licensed which, in addition to a wheelchair passenger, can carry only a limited number of passengers and amount of associated luggage.
- 4.6 It is therefore recommended that the Board seeks views, as set out at Appendix 3, as to whether rear-loading vehicles should continue to be licensed as wheelchair-accessible taxis (or wheelchair accessible MPVs for use as private hire cars). It is recommended that the views of consultees are also sought as to when any change of policy, to prevent the licensing of such vehicles, might be introduced. This could be achieved by a requirement that any vehicle to be licensed in Renfrewshire as a taxi (or wheelchair-accessible MPV licensed for

private hire use) for the first time, either by way of an application for a new licence or an application for a change of vehicle, must be side-loading, as suggested at Appendix 3. Views are also sought in Appendix 3 on a possible alternative approach, based on the number of passengers and amount of luggage which can be carried in addition to a wheelchair passenger. Should the Board, after consultation, adopt such an approach, any requirements would need to be precise and measurable. It is proposed that views are, similarly, sought from consultees as to whether any policy change to this effect should be introduced in respect of vehicles proposed to be licensed as taxis in Renfrewshire for the first time, or on some other basis.

- 4.6.1 Officers have considered whether there should be any change to the regularity of testing of taxis by the Council. Currently, taxis require to be inspected annually by the Council and then, after they attain the age of five years, at six-monthly intervals. In the proposed consultation questions at Appendix 3, it is suggested that views are sought as to whether tests should be required biannually after taxis reach the age of three years old. The general requirement exists that vehicles (i.e. not restricted to any vehicles intended for hire), require an MOT test after they become three years old. Vehicles used as taxis (or private hire cars) are likely to travel considerably higher numbers of miles each year. Against this background, it might be considered reasonable to require more regular testing of taxis from an earlier age.

- 4.7 Given the availability of fully electric/zero emissions vehicles referred to at Paragraph 4.2 of the report which are likely to be suitable for use over a longer licensed period, the proposed revised specification would allow taxi licence holders the opportunity to operate a vehicle meeting enhanced criteria over an extended licensed period (the proposed taxi specification at Appendix 1 suggests a period of 15 years). It is recommended that this would apply to purpose-built taxis which are fully electric, which facilitate side-loading for wheelchair passengers and which are equipped with a single, solid access ramp for wheelchairs. While, as noted above, electric vehicles have a smaller number of mechanical parts, it may be considered that these vehicles should nonetheless remain subject to the same regularity of testing as other taxis. While engines are replaced in these vehicles by a power plant, resulting in reduced emissions, there remains a need to ensure that other parts, such as brakes, remain serviceable at all times. It is also likely that further information will in time become available in relation to the durability of batteries used in these vehicles.

- 4.8 It is proposed that the views of consultees are sought as to whether the revised specification would apply to all applications for new grant, change of vehicle or renewal made after a given implementation date, subject to any possible change to policy in relation to small/ rear-loading taxis as set out at Paragraph 4.6. In the consultation questions at Appendix 3 an implementation date of 1st March 2020 is suggested. Further information on the proposed consultation is attached at section 6 of this report. In the event that the Council does not set an implementation schedule for any changes to policy to be introduced, vehicles which do not meet any new policy requirements could continue to operate until eight years from their date of first registration.

5. Private Hire Cars

- 5.1 The Council's current private hire car specification set out at Paragraph 3.3.2 above has applied since 2002, subject to changes to vehicle age limits and removal of the minimum engine capacity (1600cc) referred to at Paragraph 3.4. The removal of the minimum engine capacity was agreed by Council in 2017, allowing electric vehicles and hybrid vehicles with smaller, more fuel-efficient engines to be licensed. This standard, and a requirement that the rear seat of licensed private hire cars in Renfrewshire be at least 48 inches wide, together meant that smaller cars, which might be considered by the Board to be unsuitable for private hire, were precluded from licensing at the time the policy was introduced.
- 5.2 Since the Council agreed its specification for private hire cars in 2002, there have however been significant developments in the power output and general construction of vehicles. In relation to power, higher outputs can now be achieved from smaller engines. As such, the engine capacity previously relied on by the Council is unlikely to be a reliable indicator of a vehicle's power. Officers have considered whether an alternative measure of power should replace engine capacity. However, while various formulations of brake horse power or a power to weight ratio could be introduced, these alternatives may be of limited assistance, particularly as the power of an engine is likely to reduce over a vehicle's lifetime.
- 5.3 Changes in vehicle design over the same period now mean that a number of small cars and medium cars (sometimes referred to as Euro segment B and C vehicles) can easily meet the Council's existing specification for private hire cars. Taking into account the removal of the requirement for a minimum engine capacity, it is the view of officers that

this specification now requires to be updated to take account of the above developments.

- 5.4 Officers have, in reviewing the existing requirements, considered the policies of a number of local licensing authorities. It is the view of officers that, while it would be possible to develop a list of private hire vehicle types suitable for licensing, it is desirable that a revised specification for private hire cars should instead set out the Council's policy requirements in succinct and simple terms. The adoption of a list setting out all suitable vehicles for use as private hire cars, similar to the list the Council operates for MPVs, is likely to require that list to be updated frequently due to the number of vehicle types which may be licensed for private hire use. This would likely cause an unnecessary administrative burden for the Council as well as potential confusion for the private hire car trade, as some estate and saloon models of vehicles, for example, may meet the Council's requirements while the equivalent hatchback of the same model may not.
- 5.5 A proposed draft revised condition for private hire car licences has been prepared for the purposes of consultation, as attached at Appendix 2. Similar to the proposals in relation to taxis, the proposed specification would introduce, for the first time, a maximum age (5 years from the date of the vehicle's first registration) at which vehicles may be first licensed within Renfrewshire, for similar reasons as set out at Paragraph 4.3. As noted in relation to taxis at Paragraph 4.2, there is a likelihood that some vehicles will be removed from service in anticipation of the low emission zone in Glasgow being extended to taxis and private hire cars in 2022.
- 5.6 The proposed revised specification seeks to address the concern identified by officers that smaller vehicles, which appear unsuitable for use as private hire cars, may be licensed in terms of the Council's existing policy and standard licence condition. The proposal seeks to achieve this through a combination of vehicles having at least five designated seats (for a driver and four passengers) and a specified minimum luggage capacity (0.4 cubic metres, or 400 litres) with those seats up and the load cover fixed. These proposed criteria, taken together, would be likely to exclude some of the smaller vehicles currently licensed in Renfrewshire from continuing to operate. It is anticipated that, if the above proposed luggage capacity were to be agreed, it would be for applicants seeking to license a vehicle to provide evidence, when arranging their vehicle inspection, that their vehicle meets this requirement. This would likely require the manual for the vehicle proposed to be licensed to be produced. It is considered that, while the proposed luggage capacity requirement would preclude a

number of smaller vehicles, it would leave open to licence holders options including some fully electric vehicles. The Nissan Leaf, for example, has a capacity of 0.435 cubic metres (435 litres).

- 5.6.1 Similarly to the position in respect of taxis set out at Paragraph 4.6.1 above, officers have considered whether there should be any change to the regularity of testing of private hire cars by the Council. For similar reasons as set out in that Paragraph, it is suggested that views are also sought as to whether tests should be required at six-monthly intervals after private hire cars reach the age of three years old. This is again reflected in the consultation questions at Appendix 3.
- 5.7 As stated at Paragraph 4.2, as fully electric/ zero emissions cars have fewer serviceable parts than diesel or petrol engine vehicles, it may be considered that such vehicles are suitable for a longer licensed use. As such, the proposed specification includes an exception to the normal age restriction which currently applies, to allow these vehicles to operate as private hire cars for up to 10 years from their first registration. This approach would also allow licensed private hire car operators to finance their vehicles over a longer period, similar to the position in respect of taxis set out at Paragraph 4.2. Similarly as with taxis, it may be considered that the regularity of testing of these vehicles by the Council should remain the same as for other private hire cars, for the reasons set out at Paragraph 4.7 in relation to taxis.
- 5.8 It is proposed that the views of consultees are sought on the proposed revised specification at Appendix 2, as set out in the consultation questions at Appendix 3. Further, the views of consultees on possible additional requirements for wheelchair accessible MPVs to be licensed as private hire cars, and on implementation of any changes in this regard, are also sought. These proposed requirements relate to side-loading capability and the provision of single wheelchair access ramps, as already detailed in relation to taxis at section 4 of the report. Finally, it is proposed that views are also sought from consultees as to whether MPVs, which are currently considered unsuitable under the Council's current policy for use as private hire cars as they cannot accommodate wheelchair access, should now be allowed to be licensed, on the basis that they will carry only four passengers. A change to this policy would remove the anomaly whereby these vehicles cannot be licensed as a private hire car while other, smaller and similarly non wheelchair-accessible, vehicles can be licensed as private hire cars.
- 5.9 It is proposed that any revised specification might be introduced to apply to all applications for new grant, change of vehicle or renewal made after a given implementation date, with the exception of any policy to no longer

license rear-loading wheelchair-accessible MPVs, which might be applied to vehicles proposed to be licensed as private hire cars for the first time. The consultation questions at Appendix 3 suggest an implementation date of 1st March 2020. This would allow those whose licences fall due for renewal imminently after the introduction of the policy to obtain and source suitable vehicles, as required. In the event that the Council does not set an implementation schedule for any changes to policy which it may decide following consultation to introduce, vehicles which do not meet any new policy requirements will continue to operate until they attain the age of seven years from their date of first registration (or eight years, in the case of private hire cars which are wheelchair-accessible MPVs). It is proposed that the views of consultees are sought on the suggested changes and proposed implementation timetable, as set out at Appendix 3.

- 5.10 Further information on the proposed consultation is attached at section 6 of this report.

6. Next Steps

- 6.1 Should the Board agree the proposed revised specification for taxis and private hire cars as suitable for consultation, officers will commence a consultation exercise, to include all taxi and private hire car licence holders and other stakeholders. It is anticipated that the consultation period would run for a period of approximately eight weeks.
- 6.2 Following the close of any consultation agreed by the Board, officers will bring a further report to the Board, detailing the responses received to allow the Board to consider the introduction of a new policy on taxi and private hire car specifications. Should the Board agree a new policy at that time, it would remain open to any licence holder following its implementation to make an application which is outwith the terms of that policy. The Board, in those circumstances, would consider any submissions made by the applicant for the licence in deciding whether to make an exception to the terms of the policy.

7. Numbers of Passengers Permitted within Taxis and Private Hire MPVs

- 7.1 In reviewing the Council's taxi and private hire car specifications, officers have also reviewed the Council's policy, agreed on by the Corporate Services Committee on 13th March 1997, that multi purpose vehicles

(MPVs) approved for use as Taxis and Private Hire Cars shall carry no more than seven passengers.

- 7.2 It may be considered that this restriction is no longer required. Taxis and private hire cars may carry a maximum of eight passengers in terms of the relevant legislation. A number of licensed operators in recent years have sought an increase in the maximum number of passengers who may be carried under the terms of their licence, to eight. The Board has as a result granted a number of these applications as an exception to the above policy.
- 7.3 Given the above, as also the Council's commitment to environmental sustainability and the climate emergency recently declared by Council, the Board may now wish to consider the removal of this restriction. As well as allowing more passengers to travel within a licensed vehicle, this change would enable future applications for grant or variation of licences, which seek to allow eight passengers to be carried, to be considered by officers under delegated powers, where the vehicle has nine designated seats (for the driver and eight passengers). It is recommended that the views of consultees are also sought on this matter, as recommended at Paragraph 2.4 of the report.

Implications of the Report

1. **Financial** – Nil. The recommendations in the report are to agree at this stage a proposal for the purposes of public consultation.
2. **HR & Organisational Development** - Nil
3. **Community/Council Planning** –
 - Our Renfrewshire is safe – the improved regulation of taxis and private hire cars through licensing, and by ensuring suitable vehicles are available to the travelling public, contributes to safer communities.
 - Reshaping our place, our economy and our future – the availability of suitable vehicles is important to the travelling public, visitors to Renfrewshire and the night time economy.
 - Building strong, safe and resilient communities – the improved regulation of licensed vehicles contributes to safer communities.
 - Tackling inequality, ensuring opportunities for all – ensuring vehicles are accessible for the travelling public.
 - Creating a sustainable Renfrewshire for all to enjoy – ensuring that licensing policies facilitate the use of greener technology.
4. **Legal** – Section 10(2) of the Civic Government (Scotland) Act 1982 states that the Council, as licensing authority, shall not grant or renew a

taxi licence or private hire car licence unless they are satisfied that the vehicle to which the licence is to relate is suitable in type, size and design for use as a taxi or private hire car. Under Paragraph 5(3)(d) of Schedule 1 to that Act, the Council as licensing authority shall refuse an application to grant or renew a licence, in their opinion “other good reason” exists for refusing the application.

Paragraph 5 also allows the Council to attach reasonable conditions to a licence.

5. **Property/Assets – Nil**

6. **Information Technology - Nil**

7. **Equality & Human Rights -**

The Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report because the recommendations in the report seek only that a consultation, on proposed changes to the Council's policies on vehicle suitability, be carried out at this time. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website.

8. **Health & Safety - Nil**

9. **Procurement - Nil**

10. **Risk – Nil.** At this time, the recommendations are restricted to agreeing a consultation on possible changes to the Council's licensing policies and conditions.

11. **Privacy Impact – Nil**

12. **Cosla Policy Position – Nil**

13. **Climate Risk –** The recommended consultation contains proposals which would facilitate the licensing of more sustainable vehicles as both taxis and private hire cars.

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Proposed New Taxi Licence Condition

“22. All vehicles licensed as taxis shall:-

Either

- (A) (i) be coloured white;
(ii) be purpose-built taxis with European Whole Vehicle Type Approval and wheelchair accessible;
(iii) be fully electric/ zero emissions vehicles;
(iv) be side-loading for wheelchair access;
(v) have a single, solid ramp for wheelchair accessibility;
(vi) be less than five years old from the date of first registration when first licensed within Renfrewshire;
(vii) be less than 15 years old from the date of the first registration of the vehicle. Vehicles shall be taken out of service and replaced when they become 15 years old from the date of first registration;
and
(viii) be subject to 6 monthly inspections as from the time they are 5 years old from the date of first registration

Or

- (B) (i) be coloured white;
(ii) be wheelchair accessible and either purpose-built taxis or alternatively multi person vehicles (MPVs) of a type approved by the Licensing Authority;
(iii) be less than five years old from the date of first registration when first licensed within Renfrewshire;
(iv) be less than 8 years old from the date of the first registration of the vehicle where that vehicle is wheelchair accessible and should otherwise be less than 7 years old. Vehicles shall be taken out of service and replaced when they become 8 years old/ 7 years old from the date of first registration respectively; and
(v) be subject to 6 monthly inspections as from the time they are 5 years old from the date of first registration.”

APPENDIX 2

Proposed New Private Hire Car Licence Condition

- “1. The holder of a private hire car licence shall use as a private hire car, a four door saloon, a five door hatchback or estate vehicle, or alternatively a multi person vehicle (MPV) of a type approved by the Licensing Authority. All vehicles licensed as private hire cars shall:
- (i) be any colour other than white;
 - (ii) be less than five years old from the date of first registration when first licensed in Renfrewshire
 - (iii) subject to the exception below for fully electric/ zero emissions vehicles, be less than 7 years old from the date of first registration, unless the vehicle is a multi person vehicle (MPV) and wheelchair accessible where that vehicle shall be less than 8 years old from the date of first registration. Subject again to the exception below for fully electric/ zero emissions vehicles, vehicles shall be taken out of service and replaced when they become 7 years/ 8 years old from the date of first registration respectively;
 - (iv) have at least five designated seats (for driver and four passengers);
 - (v) have a luggage compartment with a minimum capacity of 0.4 cubic metres (400 litres) (with the seats up and the load cover fixed);
 - (vi) be subject to 6 monthly inspections as from the time they are 5 years old from the date of first registration.

Exception referred to above: Fully electric/ zero emissions vehicles licensed as private hire cars may be licensed until they are ten years old from the date of first registration. Such vehicles shall be taken out of service and replaced when they become 10 years old from their date of first registration.

Taxis

1. Do you support the proposed revised specification for taxis?
2. Do you support the introduction of a maximum age at which a taxi may first be licensed in Renfrewshire? If so, is the proposed 5 years a reasonable requirement? Please provide an explanation.
3. Should all taxis require to be equipped with a single, solid ramp for wheelchair access? Please give reasons for your answer.
4. Should this requirement affect all renewal applications made after a specified implementation date, as well as new licence and change of vehicle applications (where a vehicle is proposed to be licensed for the first time)? Please give reasons for your answer.
5. Would 1st March 2020 be a reasonable implementation date? Otherwise what do you think a reasonable date would be? Please give reasons for your answer.
6. Otherwise, please advise how you think any new requirements would best be implemented?
7. Should rear-loading vehicles be considered unsuitable to continue to be licensed as taxis? Please provide an explanation.
8. If so, should existing licensed rear-loading taxis be allowed to continue in service until the eighth anniversary of their first registration, with any change of policy only applying to those vehicles proposed for licensing in Renfrewshire for the first time? Please provide an explanation.
9. If you believe rear-loading vehicles should be allowed to be licensed, should minimum requirements be introduced as to how many passengers, and how much associated luggage, in addition to a wheelchair passenger, a licensed taxi is capable of carrying? Please specify what you think the requirements should be.
10. If so, should existing taxis affected by any change in policy be allowed to continue in service until the eighth anniversary of their first registration, with any change of policy only applying to those vehicles proposed for licensing in Renfrewshire for the first time? Please provide an explanation.
11. Do you agree that fully electric vehicles meeting the additional accessibility requirements set out in the proposed taxi specification should be allowed to be licensed for a longer period?
12. Do you agree that 15 years is a reasonable period over which these taxis should be licensed?
13. Should any other requirements be introduced to improve the accessibility of taxis for the travelling public (for example, minimum dimensions or particular features)?
14. Should the Council introduce a new requirement that taxis should be inspected at six monthly intervals once they attain the age of three years from their date of first registration? If this change were to be introduced, do you agree that the same requirements should apply to electric taxis?
15. Please provide any further information as to changes you think should be made to the Council's requirements for licensed taxis.

Private Hire Cars

1. Do you support the proposed revised specification for private hire cars?
2. Do you support the proposed introduction of a maximum age at which a private hire car may first be licensed in Renfrewshire?
3. Do you support the proposed requirement that vehicles have five designated seats (for driver and four passengers)?
4. If not, do you suggest an alternative requirement?
5. Do you support the proposal to introduce a minimum luggage compartment capacity?
6. If so, do you agree that 0.4 cubic metres (400 litres), with the seats up and the load cover fixed, is a reasonable requirement?
7. If not, do you have an alternative suggestion?
8. Should MPVs which are unable to accommodate wheelchairs be considered suitable for licensing, on the basis that they are allowed to carry no more than four passengers?
9. Do you agree that fully electric/ zero emissions vehicles should be allowed to be licensed over a longer period as private hire cars?
10. If so, do you agree that 10 years would be a reasonable period to license these vehicles?
11. If not, what period do you suggest?
12. Do you agree that any proposed changes should be introduced to apply to all future applications for new licences, renewals of licence and change of vehicle applications which are made after an agreed implementation date?
13. If so, would 1st March 2020 be a reasonable implementation date? If not, what date would you suggest?

Questions 14- 21 apply to the use of wheelchair accessible MPVs as private hire cars-

14. Should all wheelchair accessible MPVs to be used as private hire cars require to be equipped with a single, solid ramp for wheelchair access?
15. Should this requirement affect all renewal applications made after a specified implementation date, as well as new licence and change of vehicle applications (where a vehicle is proposed to be licensed for the first time)? Please give reasons for your answer.
16. Would 1st March 2020 be a reasonable implementation date? Otherwise what do you think a reasonable date would be? Please give reasons for your answer.
17. Otherwise, please advise how you think any new requirements would best be implemented?
18. Should rear-loading vehicles be considered unsuitable to continue to be licensed as wheelchair accessible MPVs used as private hire cars? Please provide an explanation.
19. If so, should existing licensed rear-loading, wheelchair-accessible MPVs be allowed to continue in service until the eighth anniversary of their first registration, with any change of policy only applying to those vehicles proposed for licensing as private hire cars in Renfrewshire for the first time? Please provide an explanation.?

20. If you believe rear-loading wheelchair-accessible MPVs should be allowed to be licensed, should minimum requirements be introduced as to how many passengers, and how much associated luggage, in addition to a wheelchair passenger, a licensed vehicle is capable of carrying? Please specify what you think the requirements should be.
21. If so, should existing vehicles affected by any change in policy be allowed to continue in service until the eighth anniversary of their first registration, with any change of policy only applying to those vehicles proposed for licensing in Renfrewshire for the first time? Please provide an explanation.
22. Should the Council introduce a new requirement that private hire cars should be inspected at six monthly intervals once they attain the age of three years from their date of first registration? If this change were to be introduced, do you agree that the same requirements should apply to electric vehicles?
23. Do you have any other comments in relation to the Council's specification for licensed private hire cars?