

**From:** Paul Le Huray [REDACTED]  
**Sent:** 01 April 2022 10:55  
**To:** Rackley, Shaun <Shaun.Rackley@torbay.gov.uk>  
**Subject:** Policy Changes

Hi Shaun,

Just writing in response to the proposed policy changes. I would support all of the changes with the exception of the following two.

*14.6 - It is proposed that the maximum vehicle age for new Hackney Carriage and Private Hire vehicles to be licensed, be decreased from 4 years to 3 years. There is also the removal of the maximum mileage of 50,000 miles, so any mileage will be accepted.*

This change I believe will add to the existing issue of attracting new drivers to the trade. We are still 30- 40 drivers short of pre-pandemic numbers and are struggling to attract new drivers to the trade. The shortage of drivers has become a huge issue for us and it is not unusual to be quoting delays of up to 2 hours at peak times. Obviously the newer the vehicle the higher the cost to purchase, this will definitely put prospective drivers off from applying, especially when you consider the other costs involved in gaining a licence. I would like this to stay the same at 4 years.

*14.56 - All Hackney Carriage vehicles must now be able to take card payments. It is proposed that drivers/owners will have until the 30th September 2022 to ensure a payment device is available.*

*- No minimum card payment can be specified when taking a card payment.*

This is a good move but I cannot understand why this has not been proposed for **all** licensed vehicles. We at Torbay Taxis have had payment terminals in our vehicles for 10+ years and have seen the use of cash diminish considerably over this period. Hackney and private hire vehicles are essentially performing the same role of transporting passengers from A to B, so surely it is important for someone travelling in a licensed vehicle to have the same service in both. I hesitate to use the term discriminatory, but there are two points I would make:

1. The new rule does appear to favour private hire drivers who will not have the same costs imposed on them as the hackney trade with regards to the cost of the terminal and transaction fees.
2. My second point would be that due to the fact that there would be payment terminals in all hackney vehicles, this could be advertised in a negative way to imply that private hire vehicles do not.

Both of these issues could be avoided by expecting all licensed vehicles to have a payment terminal available.

Feel free to contact me to discuss.

Best regards,

Paul.

*Paul Le Huray*

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