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Sent: 02 April 2022 11:16
To: Rackley, Shaun <Shaun.Rackley@torbay.gov.uk>
Subject: Changes to Torbay Council's Taxi Policy May 2022-Eco Vehicles

Hi Shaun

Thanks for the chance to comment. Most if not all of the proposed changes will not ultimately effect me as i suspect most will happen after my driving days are over. However such means that i can put forward views that i believe to be unbiased, based on 20 years of experience and without an individual agenda,so here goes

1Whilst i agree that there has to be restrictions as to what vehicles can be plated, i do not see what difference this change will actually make. In effect you could plate a 3 year old car with 100000 miles on the clock and decline to plate a 4 year car with 20000 miles on clock-no logic to that. I am sure that you are aware of current recruitment difficulties. I suspect there are many reasons for such, but i believe the initial "start up" costs to be a factor and i believe this change of policy would mean that the cost of buying a suitable car would increase

Re Good to see that implementation of licensing only new 100% now is being proposed for May 2030.This has to be right. Obviously if such becomes mandatory legislation by 2030, none of us have a choice, however i have no doubt that here in Torbay were are no where near ready, i.e Electric Cars do not travel far enough without charge, there certainly is insufficient charge points in Torbay, and many people have no at home facility Frankly unless there is massive change to the infrastructure/facilities, then mandatory 100% Electric cars will simply not work. Therefore it is good to note a 2027 review ahead of a possible mandatory government policy.as per 14.7

Ref the 2 year reduction on age of vehicle policy, i do not see what advantage such has. Cars should be judged on condition and being fit for purpose as opposed to age.e.g you could have a 10 year old car in better condition than say an 8 year old car with higher mileage. After saying all that, it will not be a problem for most in as much as if you drive a taxi past its 8 year age it is usually finished anyway. I personally feel that "blanket policies " need to be avoided and each situation should be judged on its merit.

Ref Compliance test, don't have much to say on this matter,just means the car is checked more often,-fine

Ref Public Liability- I thought this was already mandatory as opposed to a proposal, as i see it not a problem, it already is part of most if not all policies, and my case i have 10 million pound cover anyway.

In conclusion, whilst i am all for changes that deal with climate change, public safety and complying with legislation etc, all authorities need to take care regarding change. Post pandemic there appears to be a growing problem with taxi driver recruitment. There may well be many reasons for this, but i suspect one of issues to be the "set up" costs for someone new. E.G they will have a substantial initial outlay to buy a vehicle that Torbay Council will licence, followed by a substantial first year insurance cost, if you then add the other costs to the equation then i believe that you are looking at around 20K costs. If you then impose too many vehicle restrictions/changes that mean higher costs and/or more frequent change of vehicle, then i think you compound the problem. I accept the safety angle, but feel the vehicle age to be irrelevant Some 10 year old vehicles could well be more roadworthy and fit for purpose than some 8 year old cars. I have serious concerns regarding the all electric vehicle policy. Ok if it becomes mandatory, then we have no choice and there is a need to work towards the goals/challenges this presents,hence it is correct to review ahead of possible mandatory change . At this stage i have no doubt that as an area we are simply not ready. In the interim period their needs to be a massive investment in infrastructure to deal with charging issues. I have additional concerns re the maximum mileage that can be achieved on a single charge. Rare i know but some taxi journeys far exceed the maximum stated by manufacturers In addition consideration will need to be made regarding the cost of purchase of an all electric vehicle.In todays market place you would probably have to buy new at a cost of 30-40K for total electric, due to limited second hand availability. Once again if the set up costs and ongoing repair/replacement vehicle costs are too high the recruitment problem will grow

Regards

Mike Lawlor