

## Vehicle Conditions

### Appendix B - 7.1 – 7.4

7.1 Private Hire vehicles must always display, securely affixed on the outside to the rear of the vehicle, the yellow licence plate as issued by the Licensing Authority.

7.2 An internal licence plate, as issued by the Licensing Authority must be displayed on the front windscreen.

7.3 Private Hire Vehicles must have signage on the rear passenger doors of the vehicle as issued by Huntingdonshire District Council.

7.4 At all times, Private Hire Vehicles must also display signage bearing the name of the private hire operator for whom the booking is being fulfilled. This signage may be in the form of a logo or text and must be displayed on the front doors of the vehicle in a clear and legible way.

## Responses

### Response 1 - Driver

With regard to the proposed 2024 Draft Taxi Policy please find my thoughts on section 7.1, 7.2, 7.3 and 7.4 regarding private hire vehicles and the display of signage.

From what I can deduce the new proposed policies require private hire vehicles to permanently display the HDC and Private Hire operator signs at all times whether in use as a private hire vehicle or not.

I believe this could cause considerable safety issues as it doesn't take into account owner drivers such as myself who use their private hire vehicle as their own method of transport when not working and not in the district. Driving workers such as bus drivers and taxi drivers are already at high risk of abuse so their privacy is extremely important.

In my experience as a police officer this would make drivers easily identifiable (along with a rough home location) when off duty putting the following at high risk of assault, identification or potentially worse crimes:

- Female owner drivers
- Drivers of ethnic minorities
- Family members of drivers
- Children of drivers

I travel to many locations outside of Huntingdonshire in my vehicle with my spouse and children and I would not want my car identified as a private hire vehicle for privacy and safety reasons.

This serious safety issue can be circumvented by adding wording such as, "When the vehicle is in use for reward for private hire" or similar to separate personal and working use of that vehicle.

With this simple adjustment of the wording the council can protect themselves against any potential litigation in future, whilst also helping protect drivers and passengers.

#### **Licensing Team Comments**

Whilst a licensed vehicle always remains a licensed vehicle regardless of its use at the time, it is a known fact that licensed drivers also use their vehicle for private use when not working. As long as a non-licensed driver is not driving the vehicle, there is no issue with amending the wording of the conditions to specify the signage must be displayed at all times when in use for the purposes of completing bookings.

#### **Appendix B – Removal of door signage for Hackney Carriages**

##### **Response**

3x responses received supporting the removal of signage on Hackney Carriages as they already have distinguishing marks on these vehicles such as the Taxi and For Hire signs.

#### **Licensing Team Comments**

#### **Section 26.5 – 26. 8 / Appendix B – 1.9**

26.5 Existing hackney carriage plates 1-44 which have retained grandfather rights to use saloon style vehicles provided the licence remains in continuous use. If a renewal application is made late and the licence lapses, the grandfather rights will be lost and a new application for a new WAV vehicle will need to be made.

26.6 Any vehicle currently licenced under retained grandfather rights (Hackney Carriage plates 1-44) may continue to be licenced until the vehicle is no longer able to meet the vehicle safety inspection standards. It will also be subject to the emission requirements as set out in the policy, details of this can be found in Appendix B.

26.7 Once a vehicle licensed under the retained grandfather rights ceases to be licensed, the plate will be removed from the list of grandfather rights vehicles and only re-issued to a wheelchair accessible vehicle

26.8 A licence issued under the grandfather rights cannot be transferred to any other vehicle. This will not remove a proprietor's right to transfer their interest in the vehicle to someone else.

Appendix B 1.9 Any vehicle currently licenced under retained grandfather rights may continue to be licenced until the vehicle is no longer able to meet the vehicle safety inspection standards. It will also be subject to the emission requirements as set out below.

#### **Responses**

##### **Response 1 - Operator**

While we understand why Grandfather rights for a vehicle deemed unsafe should be removed, the emissions requirement for existing vehicles starting on 1st September 2024 negates the Grandfather rights completely. It would be useful to understand if there are any conditions under which the Grandfather rights could remain in place after 1st September 2024.

##### **Response 2 - Operator**

I am writing to you regarding concerns I have about the proposed draft consultation under section 3.

The main classes in contention are 26.5 and 26.6

It seems these clauses are aiming to get rid of Grand father right plates for HC 1-44 over a period of time based on vehicles naturally no longer meeting standards and vehicles not being allowed to be transferred.

We are rejecting the proposal on the following remit:

We as a company have invested heavily since the Euro 6 criteria where vehicles have to be under 5 years of age.

And now with this proposed change of non compliant grandfather right plates having to be re issued onto wheelchair accessible vehicles things will become untenable for me as an operator. New and used wheelchair accessible vehicles will require major financial input, in excess of £40,000.00. A figure that will put strain on the viability of my business in providing the much needed taxi trade service in the locality.

There is also the issue of customer feedback, where many customers at present are not willing to board wheelchair accessible vehicles based on size and pricing strategy. This will no doubt have impact on customer satisfaction and having to turn customers away, with future trade affected too.

This is our livelihood and we will struggle if the above criteria 26.5 & 26.6 are enforced and become mandatory.

### **Response 2 – Driver**

This policy contradict with clause 25.1 where proprietor of vehicle has rights to transfer the vehicle to another vehicle with filling up transfer of vehicle form. I object this unfair treatment where the basic right of Hackney drivers are being taken away and forcing him to be either buy expensive wheelchair accessible vehicle or go out of trade. Those wheelchair accessible vehicles are not only expensive but also not comfortable. There are many member of public passengers who simply refuses to take a ride on wheelchair accessible vehicle and only accept to ride on saloon vehicles. This policy will lead to financial murder of grandfather rights.

### **Licensing Team Comments**

The grandfather rights apply to hackney carriages with licence plate numbers 1-44. This grandfather right allows for saloon vehicles to be licensed instead of wheelchair accessible vehicles (WAV) which is a requirement under the Equality Act 2010 (section 160 & 163). The grandfather rights have been in place for a significant number of years and account for almost half of the licensed fleet, heavily reducing the amount of WAV's available in the district. At present, a vehicle proprietor is transferring the plate to a new, non WAV vehicle. The intention of the new condition is to close this 'loophole' and the introduce more WAVs into the licensed trade.

All other vehicle conditions must be met, including the new conditions proposed restricting Euro 4 emission standards vehicles.

The proposals, if coupled with the removal of age restrictions actually allow for a greater range of vehicles which can be newly licensed, therefore reducing some of the perceived financial burden.

The licensing team are not aware of any complaints or feedback from the public regarding preference to use a saloon vehicle.

The ability to transfer the licence from vehicle to vehicle will be closed, however the right to transfer between owners (provided in legislation) will not be affected by this change.

### **Section 3 – 16.1 & 16.2**

16.1 Any application for the grant of a new Hackney Carriage or Private Hire vehicle licence, including hybrid or fully electric vehicles, must as a minimum meet Euro 6 emission standards.

16.2 From the 1st of September 2024, any existing licensed Hackney Carriage or Private Hire Vehicle must, as a minimum, meet Euro 5 emission standards. This new standard will be applicable upon renewal of the vehicle licence and if it does not meet Euro 5 standards, the licence will be refused.

### **Responses**

#### **Response 1 – Driver**

I would object to this proposal as it will cause a sudden financial burden on taxi drivers to change the vehicle, even the current vehicle is 100% mechanical fit. Not all driver has finance resources and will lead many drivers to be out of work due to unaffordability of buying new EURO 6 vehicles. I would suggest to keep re-licencing current vehicle which are mechanically fit for compliance test.

#### **Response 2 – Driver**

I think all Euro 4 and Euro 5 should be removed from being a taxi

#### **Response 3 – Operator**

We also welcome your decision to not to renew of Euro 4 taxifrom this year,- they are all rusty, very often break down on road, and drivers are cheating during Mot( temporary fix, borrowing wing mirrors, doors, bumper etc from other drivers who has similar vehicles and give them back once Mot is passed, I have personally witnessed this Many times)

#### **Response 4 – x2 Drivers (same response)**

I am reaching out to you as a self-employed individual who holds a Huntingdon District Hackney License, I am the primary provider for my young family, and a homeowner whose livelihood hinges on the operation of my wheelchair accessible taxi. After reviewing the recent consultation regarding licensing regulations, particularly pertaining to Euro 4 vehicles, I am compelled to share my concerns and thoughts, respectfully, I would request an extension of at least four years before any regulatory changes are enforced.

As a taxi driver predominantly stationed at the Huntingdon train station rank, the sustainability of my 7-seater wheelchair accessible vehicle directly impacts my financial stability. This vehicle not only serves as my primary income source but also affords me the flexibility to attend to my young family's needs, including school engagements and appointments.

The potential loss of my taxi due to the proposed regulations would not only pose a financial setback but also impose exploring alternative avenues of support, potentially through government benefits. Additionally, the current economic downturn, compounded by the existing recession in the UK, increases the challenges faced by self-employed individuals like myself.

The abrupt implementations of these regulations would render my vehicle unsuitable for licensing elsewhere or for private sale due to its age and mileage, consequently depreciating its value significantly. Furthermore, the steep price hike for Euro 6 wheelchair accessible vehicles presents a financial obstacle that I cannot surmount without assistance.

Hence, I respectfully request an extension of at least four years to continue operating my current vehicle. During this period, I commit to diligently saving towards acquiring a Euro 6 wheelchair accessible vehicle in alignment with the council's Cleaner and Greener Huntingdonshire policy. Additionally, any support, grants, or bursaries extended by the council to facilitate this transition would be immensely appreciated.

I trust that you will consider my situation and recognise the hurdles faced by self-employed taxi drivers supporting dependent families. Your understanding and cooperation in this matter are vital and would benefit not only me but also many others Taxi drivers in similar circumstances.

#### **Response 5 – Environmental Health HDC**

The proposal is that with new licences the vehicle must, as a minimum, meet Euro 6 emission standards and from September this year any existing licensed vehicles must, as a minimum, meet Euro 5 emission standards. This is positive, however, it is noted that consideration could be given to promoting the use of dual fuel or fully electric vehicles in more urbanised areas in future and as the policy is only reviewed every 5 years it could be considered whether this could be included now as a future objective.

#### **Response 6 – Driver**

The removal of the entry age requirement is again, a sensible decision, given that testing the roadworthiness and suitability of vehicles for service to the public was already in place and continues to be a better measure of suitability than an indiscriminate age limit on entry, especially when those working in the industry are aware that, especially in the case of hackney carriage vehicles, and wheelchair accessible hackney carriage vehicles in particular, such specialist vehicles are significantly more expensive to buy and run than the saloon vehicles used as private hire vehicles, and are accordingly constructed to a better standard and with greater longevity in mind.

The specialist nature of these vehicles and their greater longevity mean that a new wheelchair accessible hackney carriage vehicle, (which are the only hackney carriage vehicles available as new applications,) are priced at around £38,000 or more and some secondhand makes and models command a price between £23,000 and £39,000, which given their greater utility and service to the

community compared with the price of new and secondhand estate and saloon cars available to private hire and hackney carriage legacy drivers, (which can be as little as £10,000 for a policy compliant secondhand vehicle, to £20,000 for a new compliant vehicle,) has been a barrier to new entrants and a barrier to vehicle replacement. It has also offered an unfair advantage to private hire and drivers of legacy hackney carriage vehicles that are estate and saloon cars that have both a lower purchase price and that also offer greater fuel efficiency and running costs than wheelchair accessible hackney carriage vehicles, which was further confounded by the irregular mileage rate reviews and increases that create price shocks amongst users.

All this being said, the removal of the “5 year” entry rule and the end to this very obvious inequity is to be welcomed, and it is to be hoped that revisions to other parts of the policy are not taken forward to effectively produce the same undesirable and unintended consequences on drivers of wheelchair accessible hackney carriage vehicles in Huntingdonshire.

I also note that there is a proposal to set a minimum emissions standard for licensed vehicles at Euro 6 for newly licensed vehicles and Euro 5 for existing licensed vehicles, and this is effectively introducing the 5 year rule in another format, based on vehicle emissions, that like the proposed existing 5 year rule, will act as a barrier to entry for new entrants to the wheelchair accessible hackney carriage service and to replacements of older wheelchair accessible hackney carriage vehicles as their purchase and running costs are prohibitive relative to private hire and legacy hackney carriage estate and saloon cars. The Council will already be aware of the difficulties wheelchair passengers experience in sourcing a wheelchair accessible hackney carriage or private hire vehicle in Huntingdonshire District, and I note that the Council has proposed to amend the current policy so that a register of licensed wheelchair accessible vehicles will be maintained.

This is a very positive step, and one that I have suggested to the many wheelchair users that have contacted me should be set up, and it is encouraging to see that their voices have been heard.

It should be noted however, that it will not resolve the shortage of availability that exists in the District overall, (e.g. there are fewer than 5 wheelchair accessible taxis working in St. Neots, which has a population of over 33,000 residents,) and that the likely consequence of that change to policy will be a further reduction in the number of wheelchair accessible vehicles available for public or private hire to wheelchair user passengers in Huntingdonshire.

It should also be noted that I have been contacted by many passengers to whom I have recommended Huntingdonshire based services that have wheelchair accessible vehicles in their fleet that operate in the area that the passenger requires, and the passenger has confirmed that the providers I have suggested they try have told them either that their vehicle is already fully booked for the date required by the passenger or that the vehicle is unavailable for some other reason. The situation is such that I now find myself travelling to passengers across the whole district, because passengers have been unable to source on a suitable future date, provision for their prospective booking. Any actions on the part of the

Council that reduce the availability of transport provision for disabled passengers will be detrimental to the needs of those passengers.

The requirements to reduce emissions to improve air quality for resident, particularly emissions from diesel vehicles in inner city areas, has been understood and responded to with the introduction of low emission zones and the introduction of emissions charging and a phasing out of diesel vehicles in public transport and local authority owned vehicles. Whilst the impact on resident's air quality in cities such as London and Manchester has been well documented, there doesn't seem to be a similar case that the residents of predominantly rural areas, such as Huntingdonshire, which suffers little or no traffic congestion in which vehicles with running engines stand or move slowly, the Council should demonstrate that there is a significant benefit to be gained from forcing from service, public and private hire vehicles that remain lawful to use on the roads and that won't be subject to restrictions or additional charges in the District when not being driven as licensed vehicles.

To force such vehicles off the road, when they are, in all other respects legal and roadworthy and may be driven as ordinary vehicles, simply because they're under the control of the District Council would be disproportionate and punitive. There is also no evidence provided by the Council in its proposals that would show that the number of non Euro 5 or Euro 6 vehicles currently operating as public or private hire vehicles in the District is such that a universal ban on non Euro 5 and Euro 6 vehicles would have any meaningful impact on emissions reductions or on air quality for residents. It should be incumbent on the Council to provide evidence of the current number of licensed private hire and hackney carriage vehicles that will not meet the new requirements, so that an assessment can be made by those commenting and providing feedback can do so in an informed way, such that they can assess the number of individuals affected and the scale of benefit to be expected from such as ban.

Furthermore, where licensed vehicles that do not meet licensing department emissions standards have been removed from service by Councils through a change in licensing requirements, the licensing bodies that have instigated and enforced those changes have set up "scrappage schemes" to compensate owners of licensed vehicles for the loss of their vehicle and the costs of replacing that vehicle with one that meets the licensing authorities' revised standards, to ensure individuals and owners are not disproportionately affected in pursuance of the licensing authorities' wider aims.

In addition to the scrappage compensation schemes outlined above, licencing authorities that have introduced regulations banning from service licensed vehicles that do not meet licensing authorities' revised emissions standards have also ensured a suitable implementation period from the time the new policy comes into effect to the time such vehicles must be removed from service, rather than simply requiring such vehicles to be removed from service on the date of implementation of the revised policy.

As an alternative to supporting licence holders with scrapping non compliant vehicles, other licensing authorities that have enforced the withdrawal from service

of vehicles through policy changes such as those proposed by the council have provided support to licence holders to convert their vehicles to less polluting alternatives that also extend the working life of the vehicle through, e.g. conversion to LPG which permits the vehicle to remain in service for nn years after the date of conversion, or through the installation of a compliant engine. This approach also has the virtue of not reducing to scrap a vehicle which in all other respects remains viable as a service vehicle before being scrapped, this further defraying the original environmental impact that arose from its initial production.

Should Huntingdonshire District Council decide that the aim of improving air quality by reducing the number of non Euro 5 or Euro 6 compliant vehicles in service is proportionate to the impact of removing that number of vehicles from service and the likely reduction in wheelchair accessible to transport to disabled passengers in rural areas with few available suitable transport alternatives, then an appropriate phased implementation period of at least 12 months taxi plate/plates from the date of implementation of the policy to the removal of affected vehicles from service in the District.

**10x other responses supporting removing the 5 year age restriction in favour of a Euro 6 minimum**

**4x other responses opposing the removal of Euro 4 from trade**

#### **Licensing Team Comments**

The current policy requires a newly licensed vehicle to be a maximum of 5 years old from date of first registration. Currently that would require a vehicle to be no older than a 2019 model vehicle. By introducing a minimum requirement of Euro 6, this would increase the maximum age to include vehicles from 2015 (as long as they are Euro 6 compliant) allowing the trade a greater range of vehicles at potentially far cheaper prices, all whilst achieving the aim of lower carbon emissions.

The removal of Euro 4 is seen as a positive step to not only reducing carbon emissions, but also removing older, potentially less reliable vehicles from trade, some of which are approaching almost 20 years old. The Licensing Team have seen an increase in vehicles routinely failing inspections, some for very serious safety failings.

There is an obvious need to restrict vehicles from both a safety and emissions perspective. Given the restraints of a small team, there are only very few options which are both manageable and effective in achieving this outcome. These options come down to an age restriction or an emissions restriction. The downside to an age restriction is the limit is ever changing with each year and being a blanket restriction, does not keep up with any euro standard changes. The best and most adapt way is to adopt a euro emission standard which sets a minimum standard.

Given the level of response, there can be some compromise to minimise the impact on vehicle licence holders with amended proposals:

#### **Proposal 1**

'From the 1st of January 2025, any existing licensed Hackney Carriage or Private Hire Vehicle must, as a minimum, meet Euro 5 emission standards. This new standard will be applicable upon renewal of the vehicle licence and if it does not meet Euro 5 standards, the licence will be refused. Any licence holder who currently licenses a Euro 4 vehicle, may upon refusal of a renewal licence present a Euro 5 vehicle for first licensing.'

**Proposal 2**

'From the 1st of June 2025, any existing licensed Wheelchair Accessible Hackney Carriage or Private Hire Vehicle must, as a minimum, meet Euro 5 emission standards. This new standard will be applicable upon renewal of the vehicle licence and if it does not meet Euro 5 standards, the licence will be refused. Any licence holder who currently licenses a Wheelchair Accessible Euro 4 vehicle, may upon refusal of a renewal licence present a Wheelchair Accessible Euro 5 vehicle for first licensing.'

**Section 3 – 16.3**

16.3 Any licensed Hackney Carriage or Private Hire vehicle that is still licenced once it reaches 8 years old or more from first registration will be required to complete a Certificate of Compliance check at the Council approved garage every 6 months for as long as it remains a licenced vehicle.

**Responses**

**Response 1 - Operator**

We do not agree with the need for twice yearly tests for these vehicles. We believe it will add unnecessary costs for drivers and operators.

15x driver responses requesting only one inspection per year in addition to the significant responses that are listed below

**Response 2 - Operator**

We adamantly oppose the proposal outlined in section 16.3. Implementing such a measure would place unjustified burdens on vehicle owners and operators without sufficient rationale or consideration for their challenges. This proposal fails to account for the diverse circumstances and needs of businesses, especially in the face of economic challenges such as inflation and rising costs of living. It is imperative for decision-makers to reassess this proposal and engage in meaningful dialogue with stakeholders to develop more balanced and fair solutions that do not unduly burden businesses already struggling to survive in the current economic climate.

Subjecting licensed Hackney Carriage or Private Hire vehicles to mandatory biannual Certificate of Compliance checks solely based on age discrimination is unjust and impractical. Age alone does not dictate the safety or roadworthiness of a vehicle. Implementing such a policy unfairly burdens vehicle owners with additional expenses and inconvenience without sufficient evidence that older vehicles pose a greater risk. Instead, a more equitable approach would involve regular inspections based on performance and condition rather than arbitrary age limits. This would ensure that all licensed vehicles meet the necessary safety standards, regardless of their age.

Given that a significant portion of our fleet and other companies in St Ives are primarily utilized for school transportation, resulting in minimal mileage accumulation, there is a compelling argument to adjust the inspection frequency

for these vehicles. Conducting inspections every six months seems excessive and inefficient for vehicles that are subjected to low usage and operate in relatively controlled environments such as school routes. Adjusting the inspection schedule to align with the actual usage patterns of these vehicles would be a more sensible and pragmatic approach, ensuring resources are allocated effectively while still maintaining safety standards.

In light of the challenging economic circumstances faced by businesses, particularly amidst inflation and rising costs of living, it is imperative for regulatory authorities to empathetically consider the difficulties confronting vehicle owners and operators. Adding additional burdens, such as more frequent inspections, without taking into account the existing challenges faced by businesses, could exacerbate financial strain and further jeopardize the viability of operations. Therefore, it is prudent for authorities to exercise flexibility and understanding, taking into account the broader economic context when implementing regulatory measures to ensure they are reasonable and equitable for all stakeholders involved.

### **Response 3 - Driver**

I have a PEUGEOT EXPERT TAXI 59 plate in very good condition, I take pride in my vehicle and always ensure it is fit for purpose just as I am.

I understand the whole situation on carbon emissions and euro standards and wording changed from "global warming" to climate change, from the ozone layer depleting and ice caps melting, which we are still waiting for to happen.

Sorry to digress, generally MOT is undertaken annually and so by law we have to have an annual MOT check and DVLA allows us and it means that for a year our vehicles are road worthy (needless to say the roads aren't worthy for the vehicles).

I find it pointless and time consuming for 6 months checks to be done, all it is doing is generating more revenue for the tester and we drivers are out of pocket. It is our responsibility to ensure that our vehicles are safe maintained to very high standards and they are put bread and butter.

### **Response 4 - Driver**

I would object his proposal for not understanding the ground of this proposal. Why vehicle does need 6 months compliance check if it passes the national standard 12 month compliance check. Clearly policy draft maker are considering only the age of vehicle but not the health and fitness of vehicle. I am surprised policy maker has not suggested for daily or monthly test for 10 year or more old vehicle. Another point is for vehicle insurance, does more than 8 year vehicle need to be insured for every 6 month? It is not clear in the policy draft.

### **Response 5 – Driver**

The proposed introduction of six monthly tests for roadworthiness is also a positive change, given that, so far as I am aware, Huntingdonshire District Council, unlike many other licensing authorities does not undertake roadside inspections.

I note however, that the proposal is unclear on whether the six monthly tests for vehicles over 8 years old will also require such vehicles to have a new licence

plate issued every six months, and will effectively increase the District Council's licensing income stream at the expense of hackney carriage drivers, or whether the test will simply be required in order to ensure the vehicle licence plate is not revoked should the vehicle fail it's second test in the twelve month period.

### **Licensing Team Response**

The licensing team have noticed a growing concern with the frequency of vehicles failing inspections, some due to serious safety concerns. Whilst age alone cannot be a reliable measure for the safety of a vehicle, it is far more likely that an older, higher mileage vehicle will have more mechanical defects than a newer, lower mileage vehicle. Similar to the comments made about some form of restriction for vehicle age/emission standards, there needs to be something implemented to ensure vehicles are safe to be used for journeys.

The average licensed vehicle is likely to be used far more frequently than an average vehicle which is subject to an annual MOT, therefore it is not unreasonable to require a licensed vehicle to undergo two inspections per year when a certain age is reached. If the proposal to change the 5 year limit on newly licensed vehicles to accepting a minimum of Euro 6 standards, then a newly licensed vehicle may enter the trade up to 9 years old with no mileage restrictions.

Therefore, it is recommended that one additional test per year is required for all vehicles over 8 years old. This is benchmarked across all other districts in the Cambridgeshire County area, with the other local authority requirements listed below:

**Cambridge City – all vehicles to be tested every 6 months**

**Peterborough City – after 8 years old for any vehicle hybrid 105g/km or lower / after 6 years if conventional fuel**

**Fenland District – all vehicles after 5 years of age, tested every 6 months**

**South Cambs District – no frequency given, but annual standard MOT + CoC required**

**East Cambs District – all vehicles after 6 years of age, tested every 6 months**

Under the Local Government (Miscellaneous Provisions) Act 1976, there is provision for a licensing authority to require a vehicle to be presented for inspection to ascertain its fitness providing a vehicle is not required to undergo more than 3 inspections in a 12 month period.

### **Section 3 – 24.9**

24.9 A hackney carriage driver or private hire operator must ensure that the customer is offered the option of making payment via card or cash.

### **Responses**

#### **Response 1 - Operator**

We understand that this requirement pertains specifically to hackney carriage drivers offering card payments and does not mandate private hire operators to provide cash payments. To avoid any ambiguity, we suggest modifying this section accordingly.

3x other responses received supporting this condition

**Licensing Team Response**

The wording on the final policy can be altered to clarify that cash payment is not a requirement rather where cash only is accepted, a card payment option must be offered.