

2025 Consultation Question	2025 Raw Consultation Responses Data	Licensing Team Response
Does the drivers' policy cover all obligations and requirements? - Reason:	Current Dbs process has issues what guarantees that moving to new system it will be more efficient and easier for drivers. Current applications asks if you are subscribed to update service, but if policy is you must be subscribed why have a question regarding it and be clear of process.	TaxiPlus system is Tried and Tested by a large number of Local Authorities. It allows Drivers to self complete their Enhanced DBS application on-line themselves, the previous arrangement required drivers to make an appointment to attend the Council to complete their Enhanced DBS application, which was a slower process. Drivers have to sign up for the on-line DBS service themselves, the Council is not able to do this for Drivers.
Does the drivers' policy cover all obligations and requirements? - Reason:	Dbs issuestaking too long for applications to get outcome	How long Enhanced DBS applications take once applied for are a matter for the DBS service. The Council have no ability to influence this process while with the DBS service.

<p>Does the drivers' policy cover all obligations and requirements? - Reason:</p>	<p>Statement Regarding In-Taxi Policy Changes In response to the recent taxi policy changes, I would like to express my concerns as a driver. Removing the six-month MOT requirement and instead directing drivers to the depot for inspections may lead to significant challenges in securing timely appointments, given the council's limited infrastructure. This could result in drivers missing school runs and fixed contractual commitments. We respectfully request that the council retain the current system. If inspections are deemed necessary, they could instead be carried out as a 20-minute visual check during each licensing plate renewal. Additionally, the council should provide a clear checklist for visual inspections so drivers can maintain their vehicles accordingly and avoid unnecessary delays during the process. With thousands of vehicles affected, the risk of delays and drivers being taken off the road due to missed or unavailable appointments is high. We further recommend that the depot department introduce an online booking system, enabling drivers to schedule inspections quickly and conveniently, rather than relying solely on phone lines.</p> <p>3. Introduction of Formal Vehicle Check Documentation Requirements Unnecessary Burden: The new requirement for drivers to formally document vehicle safety check is viewed as an unnecessary administrative burden. Existing Safety Culture: Taxi drivers already take responsibility for ensuring their vehicles are safe. There have been no significant issues in the past under the current informal system. Lack of Clear Benefit & Oversight: Introducing new documentation adds administrative hassle without a clear, demonstrable added benefit. Furthermore, drivers need training on a formal standard sheet, and we believe the Council should be responsible for cross-checking and policing these new requirements. There needs to be clarity on "who polices and checks." An increase in fares would be necessary to cover the time and administrative costs associated with completing these checks. Driver Request: We request the Council remove or significantly reconsider this requirement, recognising the existing safety culture and vigilance among drivers.</p> <p>4. Age Limits for Wheelchair Accessible Vehicles (WAVs) WAV Entry Age: We are content with retaining the current policy of allowing WAVs up to 6 years old to enter service. Extended Maximum Age Limit: We respectfully request that the maximum age limit for WAVs be extended from 10 years to 12 years, counted from the date of first registration.</p> <p>4 Investment & Sustainability: This adjustment would allow drivers to make a more substantial investment in a decent, well-maintained WAV and keep it in service for up to 8 years, rather than being limited by the current 10-year cap. Under the current policy, drivers often struggle to find suitable vehicles that meet the 10-year requirement, leading to higher costs (e.g., respraying to meet licensing colour standards, addressing other compliance issues). Benefits: Extending the</p>	<p>We have moved the implementation date for the Council led inspections from the 1st January 2026 to the 1st April 2026, to allow for testing capacity and functionality assessments prior to implementation. Drivers will also be able to book slots on-line themselves and pay in advance. We have amended the document requirement for the driver vehicle daily checks, these are now only required to be noted as completed and report by exception. What is required to be checked daily is contained in the policy appendices. The age limit for all types of WAV have been increased post-consultation, WAV ICE vehicles 15 years, WAV Hybrid 20 years and Electric/Hydrogen unlimited. We are unable to stop any vehicle licenced in another district from operating legally in our district. We would ask that where these vehicles are operating illegally this is reported to us. We are not able to insist on taxi ranks on private land, however, we would not be against supporting any of these where they are safe to position and there is a need.</p>
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	<p>upper age limit to 12 years will provide drivers with more flexibility to find cost-effective and roadworthy vehicles without compromising on quality or compliance, benefiting both drivers and the communities they serve.</p> <p>Additional Concerns from GMB Union Taxi Members Cross-Border Private Hire Vehicles (Specifically but not limited to Wolverhampton Licensed Drivers) Unfair Competition & Illegal Plying for Hire: We are deeply concerned about the increasing presence of Wolverhampton-licensed private hire vehicles operating in our area, particularly in the town centre (High Street, Caltrop Street, and George Street). These drivers are actively offering rides to customers directly from these locations, which is a clear breach of private hire regulations as they are effectively plying for hire without a pre-booking. This severely impacts the business of our locally licensed members. Safety & Enforcement Issues: As these drivers are not licensed by our local authority, they are not subject to the same regular checks or monitoring, raising serious issues around enforcement, public safety, and fairness. Driver Request: We respectfully request the Council take urgent action to address this matter. Specifically, we suggest the implementation of a geofence for private hire vehicles that restricts them from parking or operating near these key areas unless they have a legitimate, pre-booked job. This will help maintain fair competition, protect local businesses, and ensure compliance with taxi and private hire legislation. Greater parking enforcement is also required in these areas. 5 Request for Additional Taxi Ranks We urgently need more taxi ranks to support our work. Specifically, we request a new rank at Banbury Gateway Retail Shopping Centre with at least four spaces, and another at Bicester Village with several spaces. As many businesses have relocated to retail parks, these locations are key for generating more business. It is recognised that these are private establishments, but council support would be welcomed.</p>	
Does the drivers' policy cover all obligations and requirements? - Reason:	Some requirements, including DBS checks and certain licensing processes, can take time to be completed, which may delay full compliance with all obligations.	It is unclear from the comment what "processes" are being referred to, other than DBS checks. With regard to enhanced DBS checks, as outlined in the response in row 2, the process has been improved by allowing Drivers to apply themselves on-line, rather than waiting for an appointment and having to attend the Council offices to complete the application in paper form.

Does the drivers' policy cover all obligations and requirements? - Reason:	Currently we struggle to get a response from licensing on several issues, issuing of badges and plates is left last minute a majority of the time regardless of how early you apply, , vehicle age limits are a hindrance, 3 year safeguarding tests are unnecessary, daily vehicle checks are unrealistic, 6 month checks are not required	The response is broken down below to the various parts as follows: • Currently we struggle to get a response from licensing on several issues: – It is not clear what “issues” this refers to. • Issuing of badges and plates is left last minute a majority of the time regardless of how early you apply: – Badges and Plates are issued by Licensing when all of the required documents and checks are completed. • Vehicle age limits are a hindrance:- The post consultation policy includes increasing the age limits of vehicles. • 3 year safeguarding tests are unnecessary:- We consider that regular Safeguarding training is vital—it helps equip Drivers with the confidence and tools to spot risks, act promptly, and protect people. • daily vehicle checks are unrealistic:- Daily vehicle checks are important to ensure vehicles remain safe and compliant; however, we recognise that filling in a checklist daily may be onerous. We have amended the Policy to make clear checks need to be made but only documented as completed in a diary or electronically, and any defects reported by exception only. • 6 month checks are not required:- We consider that the 6 month check is necessary to ensure vehicles remain complaint.
Does the drivers' policy cover all obligations and requirements? - Reason:	1. Currently we struggle to get a response from licensing on several issues, issuing of badges and plates is left last minute a majority of the time regardless of how early you apply, DBS applications are constantly delayed, vehicle age limits are a hindrance, 3 year safeguarding tests are unnecessary, daily vehicle checks are unrealistic, 6 month checks are not required	Repeat comment see line 6 for response
Does the drivers' policy cover all obligations and requirements? - Reason:	what guarantees that moving to new system it will be more efficient and easier for drivers.	It is not clear from the comment what is being referred to.
Does the drivers' policy cover all obligations and	We think the policy is very unfair on the drivers in question, it seems like this policy has been designed so that operators and drivers can police themselves and licensing can be made redundant. At a time when the trader is already feeling the	There are no changes in the new policy with regard to the requirements to be licenced.

requirements? - Reason:	pinch rather than relaxing rules and following suite in line with other councils why recommend a policy which makes it difficult to be a licensed driver in Cherwell.	
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Does the drivers' policy cover all obligations and requirements? - Reason:	The policy does not outline the cost of this service for a yearly subscription fee. It would benefit the license holder to be made aware of this cost. Yearly subscription fee for enhance DBS is £16.00 this new recommendation of Taxiplus should be the same price, additional cost will not benefit the licence holder as an enhance DBS check is equally as good as the Taxiplus check. Breakdown of the cost should be given to all licence holders.	The £16 cost is the yearly charge for the DBS update service, which all licenced drivers are required to subscribe to. This is an existing requirement and the fee for this is set by the DBS service not the Council or TaxiPlus. The cost of apply for an enhanced DBS check through TaxiPlus is less than the cost Cherwell DC charged to complete these. The cost is clearly displayed on the TaxiPlus page before making the application.
Does the drivers' policy cover all obligations and requirements? - Reason:	Currently we struggle to get a response from licensing on several issues, issuing of badges and plates is left last minute a majority of the time regardless of how early you apply, DBS applications are constantly delayed, vehicle age limits are a hindrance, 3 year safeguarding tests are unnecessary, daily vehicle checks are unrealistic, 6 month checks are not required	Repeat comment see line 6 for response
Does the drivers' policy cover all obligations and requirements? - Reason:	Current DBS has issues what guarantees going forward it will better it. Seems likes CDC are just pawning it of so they don't have to do the leg work as they massively understaffed	The Council have no control on how long Enhanced DBS check take once the application is made, this is a matter for the DBS service.

Does the drivers' policy cover all obligations and requirements? - Reason:	The policy omits a fair and transparent appeals process for false allegations or suspensions and fails to assess the economic impact of changes. Some measures such as depot-only testing, extended penalty points retention, and unrealistic vehicle age limits go beyond DfT guidance and create unnecessary burdens that will push drivers to licence elsewhere.	The appeal process when enforcement action is taken is always outlined, where these are available. Retaining penalty points for 3 years is in line with DfT guidance. Vehicle age limits have been increased in the post consultation policy, they have not been removed so we retain the incentives to adopt greener vehicles.
Are the assessments, tests/specifications proportionate and relevant? - Reason:	Knowledge and Safeguarding should only apply on new applications, for renewals a refresher on Safeguarding workshop	Knowledge test is only required for new driver applicants, not required at renewal. We believe Safeguarding training is a very important course for Taxi Drivers and up to date training is necessary. No refresher type course is currently offered by the provider all Oxfordshire authorities use.
Are the assessments, tests/specifications proportionate and relevant? - Reason:	Safeguarding test should only be done once and there after we should have refresher training	We believe Safeguarding training is a very important course for Taxi Drivers and up to date training is necessary. No refresher type course is currently offered by the provider all Oxfordshire authorities use.
Are the assessments, tests/specifications proportionate and relevant? - Reason:	Safeguarding should be for new drivers and renewals should have refresher courses or free of charge sessions to courses	We believe Safeguarding training is a very important course for Taxi Drivers and up to date training is necessary. No refresher type course is currently offered by the provider all Oxfordshire authorities use. Cherwell DC do not currently have the necessary trainers or resource to provide in house free refereshers courses.
Are the assessments, tests/specifications proportionate and relevant? - Reason:	Knowledge and safe guarding should be for new application and after should just be update	Knowledge test is only required for new driver applicants, not required at renewal. We believe Safeguarding training is a very important course for Taxi Drivers and up to date training is necessary. No refresher type course is currently offered by the provider all Oxfordshire authorities use.
Are the assessments, tests/specifications proportionate and relevant? - Reason:	Knowledge and Safeguarding should only apply on new applications, for renewals a refresher on Safeguarding workshop	Repeat comment, see line 17 for response
Are the assessments,	Knowledge and safeguarding requirements should apply to new applications only. For renewals, a safeguarding refresher workshop would be more proportionate.	We believe Safeguarding training is a very important course for Taxi Drivers and up to date training is

tests/specifications proportionate and relevant? - Reason:		necessary. No refresher type course is currently offered by the provider all Oxfordshire authorities use.
Are the assessments, tests/specifications proportionate and relevant? - Reason:	who will check we have done daily checks, where will we keep these records?, who will pay for me to keep these records and who will train me as to what records i should keep and how, why do we need safeguarding tests every 3 years?, why can these not be refresher courses?, why are they paid separately to my licensing fee?	Following consultation feedback, daily checks will still need to be completed, but only recorded as being completed in a diary or electronically. Only issues found will need to be recorded and corrective actions against these recorded, a full recorded list of the checks will not be required. Up to date safeguarding training is very important for Licensed Taxi drivers, no refresher course is offered by the current provider. The Safeguarding course is provided by an external supplier and paid for on booking by drivers, therefore, CDC can't take the payment.
Are the assessments, tests/specifications proportionate and relevant? - Reason:	Who will check we have done daily checks, where will we keep these records?, who will pay for me to keep these records and who will train me as to what records i should keep and how, why do we need safeguarding tests every 3 years?, why can these not be refresher courses?, why are they paid separately to my licensing fee?	Repeat comment see line 23 for response
Are the assessments, tests/specifications proportionate and relevant? - Reason:	Knowledge and Safeguarding should only apply on new applications	Knowledge test is only required for new driver applicants, not required at renewal. We believe Safeguarding training is a very important course for Taxi Drivers and up to date training is necessary.
Are the assessments, tests/specifications proportionate and relevant? - Reason:	There is no need for daily checks and then document them, drivers shouldnt have to take mandatory safeguarding courses every three years, topography test is old and dated as every driver has access to digital maps and navigation.	Daily checks are required, and drivers should already be doing these. We have amended the requirement to fully document these checks following the consultation. We believe Safeguarding training is a very important course for Taxi Drivers and up to date training is necessary. The knowledge test is being amended to take account of the widespread use and availability of digital map services.
Are the assessments, tests/specifications proportionate and relevant? - Reason:	who will check we have done daily checks, where will we keep these records?, who will pay for me to keep these records and who will train me as to what records i should keep and how, why do we need safeguarding tests every 3 years?, why can these not be refresher courses?, why are they paid separately to my licensing fee?	Repeat comment see line 23 for response

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Are the assessments, tests/specifications proportionate and relevant? - Reason:	Who will check we have done daily checks, where will we keep these records?, who will pay for me to keep these records and who will train me as to what records i should keep and how, why do we need safeguarding tests every 3 years?, why can these not be refresher courses?, why are they paid separately to my licensing fee?	Repeat comment see line 23 for response
Are the assessments, tests/specifications proportionate and relevant? - Reason:	It is ludicrous to propose points and then keep them on my record for over a year, i think when it comes to enforcement it should be proportionate to the crime	Taxi driver licenses run for a maximum of 3 years, it is sensible that points remain on licenses for 3 years, this is also in line with current Dft guidance. What points are issued for and how many points should be issued are already contained in the appendices for the policy.
Are the assessments, tests/specifications proportionate and relevant? - Reason:	Knowledge and safeguarding test should only apply to new applicants. Renewal applicants should only do safeguarding refresher.	Repeat comment, see line 17 for response
Are the assessments, tests/specifications proportionate and relevant? - Reason:	Nonetheless	No comment, can't provide response
Are the assessments, tests/specifications proportionate and relevant? - Reason:	I think the policies that are proposed seem to be getting more difficult rather than being relaxed. No wonder there's an influx of local drivers using other council licenses for work around CDC.	We are committed to having fair and robust checks for drivers who apply for licences. We do not see that "relaxing" requirements can in any way ensure we as a Licensing Authority discharge our duty to protect the public. We can't comment on the policies of other Local Authorities with regard to Taxi Drivers licences.

Are the assessments, tests/specifications proportionate and relevant? - Reason:	Several proposals are disproportionate and not evidence-based. Re-testing safeguarding for renewals is unnecessary refresher workshops would achieve the same result without cost or stress. Depot-only inspections will cause downtime, extra costs, and economic harm to local garages without proven safety gains. Stricter vehicle age and type rules are unrealistic given costs, supply, and local demand, and risk reducing fleet numbers. These measures go beyond DfT guidance and will raise costs for drivers and passengers without improving safety or service.	We maintain that regular up to date Safeguarding training is essential for licenced Taxi drivers, the Council do not have the necessary resouces and expertise to provide "workshops". We would also have concerns of the checks that the atendees have absorbed the information required. The current course with an test provides assurance the necessary learning has been achieved. The Council led inspections will take no longer than the current standard MOT, the cost will be no more than the govenment issued price for MOT's. Only the current mid-term 6 month MOT will be replaced by the Council led check. Annual MOT's can be done at any MOT providing garage, which is for the driver to decide where they go. Age limits for vehicles are being increased following the consultation, not reduced.
Are the policies' requirements and licenses options and tests relevant and proportionate? - Reason:	Safeguarding workshop as a refresher rather than being a test	We maintain that regular up to date Safeguarding training is essential for licenced Taxi drivers, the Council do not have the necessary resouces and expertise to provide "workshops". We would also have concerns of the checks that the atendees have absorbed the information required. The current course with an test provides assurance the necessary learning has been achieved.
Are the policies' requirements and licenses options and tests relevant and proportionate? - Reason:	Renewals shouldn't be tests but refresher rather	Unclear which part of the renewal process this comment is referring to.
Are the policies' requirements and licenses options and tests relevant and proportionate? - Reason:	Should be workshop refresher not test	We maintain that regular up to date Safeguarding training is essential for licenced Taxi drivers. We would have concerns of the checks that the atendees to "workshops" have absorbed the information required. The current course with an test provides assurance the necessary learning has been achieved.

Are the policies' requirements and licenses options and tests relevant and proportionate? - Reason:	Safeguarding workshop as a refresher rather than being a test	Repeat comment see line 35 for response
Are the policies' requirements and licenses options and tests relevant and proportionate? - Reason:	ull knowledge and safeguarding tests should be for new applications; renewals should have a safeguarding refresher instead.	Knowledge test is only required for new driver applicants, not required at renewal. We believe Safeguarding training is a very important course for Taxi Drivers and up to date training is necessary. No refresher type course is currently offered by the provider all Oxfordshire authorities use.
Are the policies' requirements and licenses options and tests relevant and proportionate? - Reason:	Please answer to previous questions, i think the council needs to bring itself up to speed with other councils rather than trying to stand out by being over demanding, all changes are to ease licensing teams work and increase cost and consume more time of drivers	The policy changes bring the Council more in-line with the current DFT guidance, we do not see the requirements in the policy as overdemanding. We are not sure what is being suggested by easing the work of CDC Licensing, general requirements for applications are not changing.
Are the policies' requirements and licenses options and tests relevant and proportionate? - Reason:	Pleases see answer to previous questions, i think the council needs to bring itself up to speed with other councils rather than trying to stand out by being over demanding, all changes are to ease licensing teams work and increase cost and consume more time of drivers	Repeat comment see line 40 for response
Are the policies' requirements and licenses options and tests relevant and proportionate? - Reason:	Refresher course rather than another test	No refresher course is offered by the supplier, we are also of the view that the full course provides the right level of training given the importance of the subject.
Are the policies' requirements and licenses options and tests relevant and proportionate? - Reason:	I think licensing needs to relax their rules in order to attract more drivers, knowledge tests should be scrapped or should allow licensees access to digital maps when taking these tests, drivers shouldn't need 3 years driving experience, 1 year should be sufficient	Changes have been made to the policy to remove Topographical questions from the knowledge test. The time a driver needs to have held a driving licence has been amended from 3 years to 12 consecutive months.

Are the policies' requirements and licenses options and tests relevant and proportionate? - Reason:	I think licensing should be more informative when it comes to certain actions and appeals, drivers should be able to make an informed choice.	We always provide details of the offences to drivers where enforcement is taken, details of any appeal available is also given when taking enforcement action.
Are the policies' requirements and licenses options and tests relevant and proportionate? - Reason:	Plases see answer to previous questions, i think the council needs to bring itself up to speed with other councils rather than trying to stand out by being over demanding, all changes are to ease licensing teams work and increase cost and consume more time of drivers	General comment, no specific response.
Are the policies' requirements and licenses options and tests relevant and proportionate? - Reason:	I think licensing needs to relax their rules in order to attract more drivers, knowledge tests should be scrapped or should allow licensees access to digital maps when taking these tests, drivers shouldn't need 3 years driving experience, 1 year should be sufficient	Repeat comment, see line 43 for response
Are the policies' requirements and licenses options and tests relevant and proportionate? - Reason:	I think licensing should be more informative when it comes to certain actions and appeals	We always provide details of the offences to drivers where enforcement is taken, details of any appeal available is also given when taking enforcement action.
Are the policies' requirements and licenses options and tests relevant and proportionate? - Reason:	Safeguarding workshop only no test	Repeat comment see line 37 for response
Are the policies' requirements and licenses options and tests relevant and proportionate? - Reason:	I think the current 2 MOTs system has been working ok, not sure about the new idea of depot inspection!	Mid term license MOT is being replaced witt Council led check, this is being introduced so the check can be Taxi Licence specific.

Are the policies' requirements and licenses options and tests relevant and proportionate? - Reason:	Some requirements duplicate existing systems, such as DVLA penalty points, without added value. Licence options are restricted by unrealistic vehicle specifications and limited testing locations. Several proposals exceed DfT guidance, increasing costs for drivers and passengers without measurable public benefit	DVLA penalty points are driving offence specific only, taxi license points go beyond these and include taxi licensing requirements. The Council led mid-term vehicle check is the only check required to be at the Council depot, normal annual MOT's can be done at any MOT authorised garage.
Are the conditions to acquire a license and application process comprehensive and inclusive? - Reason:	Age limit to vehicles requirements are outdated and electric vehicles are not viable at all even the 2030 target is not feasible	The age limit for all vehicles has been increased following the consultation.
Are the conditions to acquire a license and application process comprehensive and inclusive? - Reason:	6 month mot test should not be limited to just one workshop will be impossible to gwt appointments should not be discrimination against other garages need to be able to go to anyone rather than just one place for the 6 month test	We have moved the implimentation date for the Council led inspections from the 1st January 2026 to the 1st April 2026, to allow for testing capacity and functionality assessments prior to implementation. Drivers will also be able to book slots online and pay online.
Are the conditions to acquire a license and application process comprehensive and inclusive? - Reason:	Age limit to vehicles requirements are outdated and electric vehicles are not viable at all even the 2030 target not feasible Would require that new policy is included in application that 6 month inspections isn't a mot test but also visual inspection	The age limits for all vehicles is being increased following the consultation, incentives to adopt cleaner or zero emission vehicles remain. The Council is still committed to net zero by 2030 at this time.
Are the conditions to acquire a license and application process comprehensive and inclusive? - Reason:	he licensing conditions and application process are not fully comprehensive or inclusive, as outdated vehicle age limits and unrealistic electric vehicle expectations create unnecessary barriers for many operators. The 6-month inspection process also needs clearer wording to confirm it is a visual check rather than an MOT-equivalent to avoid extra costs and confusion.	Comment is not clear on where they feel the conditions and application are not comperhensive or inclusive, we believe the conditions and application are comprehensive. We are unsure why the commenter feels it is not inclusive, as we see no barriers to anyone in the process. The age limitis for all vehicles has been increased post consultation. The Council led 6 month checks will not be an MOT equivelent, and taxi specific. The implimentation date has been moved from the 1st January 2026 to

		the 1st April 2026, to allow for testing capacity and functionality assessments prior to implementation.
Are the conditions to acquire a license and application process comprehensive and inclusive? - Reason:	I think we dont need safeguarding testing every 3 years, why are we limited to 1 supplier who then makes us travel as far as Didcot if Banbury is booked up, who benefits from this? 6 month checks are expensive and unrealistic, why will we need to keep a record of daily vehicle checks is our word not good enough anymore?, age limits on grants of new license need to be relaxed as cost of new car has increased over the years	We believe regular robust safeguarding training is important and not an area we would look to relax any current requirements. The cost of the Council led mid-term license 6 month check will not exceed the government set cost of an MOT. The age limits have been increased for all vehicles post consultation.
Are the conditions to acquire a license and application process comprehensive and inclusive? - Reason:	I think we don't need safeguarding testing every 3 years, why are we limited to 1 supplier who then makes us travel as far as Didcot if Banbury is booked up, who benefits from this? 6 month checks are expensive and unrealistic, why will we need to keep a record of daily vehicle checks is our word not good enough anymore?, age limits on grants of new license need to be relaxed as cost of new car has increased over the years	Repeat comment see line 55 for response
Are the conditions to acquire a license and application process comprehensive and inclusive? - Reason:	Age limit to vehicles requirements are outdated and electric vehicles are not viable at all even the 2030 target not feasible Would require that new policy is included in application that 6 month inspections isn't a mot test but also visual inspection	Repeat comment, see line 53 for response
Are the conditions to acquire a license and application process comprehensive and inclusive? - Reason:	Things need to be made easier so that drivers are willing to take up the trade, licensing need to take down the red tape not add more to it	The policy changes does not in our opinion add any additional requirements to drivers being licenced.
Are the conditions to acquire a license and application process	I think we don't need safeguarding testing every 3 years, why are we limited to 1 supplier who then makes us travel as far as Didcot if Banbury is booked up, who benefits from this? 6 month checks are expensive and unrealistic, why will we need to keep a record of daily vehicle checks is our word not good enough anymore?, age	Repeat comment see line 55 for response

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Are the conditions to acquire a license and application process comprehensive and inclusive? - Reason:	Age limits are outdated and should be moved to 15 years with a 6 year minimum. Many councils have done this or stripped the age barrier all together and this is not DFT guidance! And electrics are not viable for 2030 at all. 6 month check not viable as public hours and cannot choose our garage in Cherwell. Have to come to Banbury when people are in kidlington, bicester	Age limits have been increased for all vehicles, and the 6 year requirement at first vehicle licence has been removed. We have moved the implimentation date for the Council led inspections from the 1st January 2026 to the 1st April 2026, to allow for testing capacity and functionality assessments prior to implementation. Drivers will also be able to book slots online and pay online. Only the mid-term 6 month council led check will have to be done at the Council depot, annual MOT's can be done at any garage authorised to carry out MOT's.

Are the conditions to acquire a license and application process comprehensive and inclusive? - Reason:	While core checks are covered, the process is not inclusive or proportionate. The knowledge test should be removed it is outdated in the modern world where satnavs, journey planners, and even AI tools like ChatGPT can provide accurate routing information instantly. Requiring it offers no additional public safety benefit. The policy also mandates a full safeguarding session for renewals, when a shorter refresher would be sufficient. In addition, the requirement to have held a full UK driving licence for three years is unnecessarily restrictive; many other councils accept one year of safe, roadworthy driving experience. These measures exclude competent drivers and create unnecessary barriers to entering and remaining in the trade	Changes have been made to the policy to remove Topographical questions from the knowledge test. We believe regular robust safeguarding training is important and not an area we would look to relax any current requirements. The time a driver needs to have held a driving licence has been amended from 3 years to 12 consecutive months.
Do the applications cover all options of license? - Reason:	Application options are narrowed by restrictive vehicle age limits, narrow WAV/EV specifications, and reduced testing flexibility. The process should reflect all legally available licence categories and remain practical, proportionate, and economically viable.	The age limits for all vehicles has been increased.
Is the enforcement policy transparent and proportionate? - Reason:	No proper investigation and Lack of Transparency as currently no way of knowing what is happening with issue and the time in responding accordingly. Loss of trust.	Unclear what is being referred to, so can't provide a response.
Is the enforcement policy transparent and proportionate? - Reason:	Drivers need to be more involved and aware of all the developments.	Consultations are carried out with the trade and public for all policy changes.
Is the enforcement policy transparent and proportionate? - Reason:	No proper investigation	Unclear what is being referred to, so can't provide a response.
Is the enforcement policy transparent and proportionate? - Reason:	No proper investigation and Lack of Transparency as currently no way of knowing what is happening with issue and the time in responding accordingly. Loss of trust.	Repeat comment, see line 66 for response
Is the enforcement policy transparent and proportionate? - Reason:	The enforcement policy lacks transparency and proportionality, with delays in communication, no clear updates during investigations, and frequent failure to answer phone calls. These issues leave licence holders uncertain about progress and outcomes, causing frustration and a loss of trust in the process.	Drivers are always notified of the outcome of investigations.
Is the enforcement policy transparent and proportionate? - Reason:	it is ludicrous to propose points and then keep them on my record for over a year, i think when it comes to enforcement it should be proportionate to the crime	Taxi driver licenses run for a maximum of 3 years, it is sensible that points remain on licenses for 3 years, this is also in line with current Dft guidance. What points are issued for and how many points should be

		issued are already contained in the appendices for the policy. We consider that any points issued are in-line with the offence.
Is the enforcement policy transparent and proportionate? - Reason:	It is ludicrous to propose points and then keep them on my record for over a year, i think when it comes to enforcement it should be proportionate to the crime	Repeat comment see line 71 for response
Is the enforcement policy transparent and proportionate? - Reason:	Enforcement is too stringent and needs to be relaxed in line with other councils,	We consider our enforcement to be measured and proportionate, we do not see relaxing enforcement is in the interest of protecting the public.
Is the enforcement policy transparent and proportionate? - Reason:	It is ludicrous to propose points and then keep them on my record for over a year, i think when it comes to enforcement it should be proportionate to the crime	Repeat comment see line 71 for response
Is the enforcement policy transparent and proportionate? - Reason:	it is ludicrous to propose points and then keep them on my record for over a year, i think when it comes to enforcement it should be proportionate to the crime	Repeat comment see line 71 for response
Is the enforcement policy transparent and proportionate? - Reason:	It is ludicrous to propose points and then keep them on my record for over a year, i think when it comes to enforcement it should be proportionate to the crime	Repeat comment see line 71 for response
Is the enforcement policy transparent and proportionate? - Reason:	No proper investigation and Lack of Transparency as currently no way of knowing what is happening with issue and the time in responding accordingly. Loss of trust.	Drivers are always notified of the outcome of investigations.
Is the enforcement policy transparent and proportionate? - Reason:	It is ludicrous to propose points and then keep them on my record for over a year, i think when it comes to enforcement it should be proportionate to the crime	Repeat comment see line 71 for response
Is the enforcement policy transparent and proportionate? - Reason:	No proper investigations and fabrications of evidence or pushing outside party's to provide evidence so they can take a driver off the road rather than work with the driver. Guilty before innocent! No proper investigation or transparency. Loss of trust	We believe all investigations are conducted fairly and outcomes based on the evidence and directed by policy.
Is the enforcement policy transparent	Suspension on allegation without due process is neither fair nor proportionate. Retaining penalty points for three to five years is excessive and duplicates DVLA	Council penalty points remaining for 3 years is in line with the current DfT guidance.

and proportionate? - Reason:	sanctions. Enforcement should be evidence-based, follow due process, and align with DfT guidance.	
Are actions and appeals comprehensive and inclusive? - Reason:	Drivers are being penalised without thorough investigation and don't get any information on how to appeal or how it is progressing	Where an appeal to a decision is available drivers are advised of this.
Are actions and appeals comprehensive and inclusive? - Reason:	I have not been told off by the council as of yet so can't answer yes	No response necessary
Are actions and appeals comprehensive and inclusive? - Reason:	Guilty before any investigation drivers get suspended on complaints so presumed guilty has big affect on mental wellbeing and financially due to being suspended	All complaints are investigated and enforcement taken when evidence suggests it is necessary.
Are actions and appeals comprehensive and inclusive? - Reason:	Driver bean penalised with out being guilty	All complaints are investigated and enforcement taken when evidence suggests it is necessary.
Are actions and appeals comprehensive and inclusive? - Reason:	Drivers are being penalised without thorough investigation and aren't get any update information on how to appeal or how it is progressing. Driver is presumed guilty without being proven guilty	Repeat of above comments.
Are actions and appeals comprehensive and inclusive? - Reason:	Statement Regarding Complaints and Disciplinary Actions for Drivers In relation to complaints about drivers, I believe the council should conduct a formal interview process to establish the facts and ensure valid evidence before taking any action that could result in a driver being taken off the road. Some complaints may be unfounded, and without proper investigation, such actions could severely impact a driver's livelihood. We recommend that, before issuing penalty points, the council adopt a fair, step-by-step disciplinary process: 1. Verbal Warning – Drivers should first receive a verbal warning for a first-time or minor mistake. 2. Written Warning – If the same issue is repeated, a written warning should be issued. 3. Penalty Points – Only if the driver repeats the offence after the above steps should penalty points be applied. This approach would help create a fair and transparent system for	Where it is deemed by the investigating officer to do so interviews are conducted. We already have a graduated approach to enforcement. However, the enforcement action is based on policy and serverity so it is not always appropriate to pass through steps as outlined in the comment.

	maintaining professional standards while safeguarding drivers from unjust penalties.	
Are actions and appeals comprehensive and inclusive? - Reason:	he actions and appeals process is not fully comprehensive or inclusive, as the policy does not clearly outline step-by-step procedures, expected response times, or how licence holders will be kept informed during investigations and appeals. This lack of transparency, combined with delays in communication and difficulty reaching officers by phone, limits fairness and undermines confidence in the system.	We will look into the communication aspect of this comment.
Are actions and appeals comprehensive and inclusive? - Reason:	I think licensing should be more informative when it comes to certain actions and appeals	We always provide details of the offences to drivers where enforcement is taken, details of any appeal available is also given when taking enforcement action.
Are actions and appeals comprehensive and inclusive? - Reason:	I think licensing should be more informative when it comes to certain actions and appeals	Repeat comment see line 88 for response
Are actions and appeals comprehensive and inclusive? - Reason:	No consistency	No context, can't provide a response.
Are actions and appeals comprehensive and inclusive? - Reason:	I think licensing should be more informative when it comes to certain actions and appeals, drivers should be able to make an informed choice.	Repeat comment, see line 44 for response
Are actions and appeals comprehensive and inclusive? - Reason:	I think licensing should be more informative when it comes to certain actions and appeals	Repeat comment see line 88 for response

Are actions and appeals comprehensive and inclusive? - Reason:	I think licensing should be more informative when it comes to certain actions and appeals	Repeat comment see line 88 for response
Are actions and appeals comprehensive and inclusive? - Reason:	I think licensing should be more informative when it comes to certain actions and appeals	Repeat comment see line 88 for response
Are actions and appeals comprehensive and inclusive? - Reason:	Drivers are being penalised without thorough investigation and aren't get any update information on how to appeal or how it is progressing. Driver is presumed guilty without being proven guilty	See comments 79-83.
Are actions and appeals comprehensive and inclusive? - Reason:	I think licensing should be more informative when it comes to certain actions and appeals	Repeat comment see line 88 for response
Are actions and appeals comprehensive and inclusive? - Reason:	Drivers are being penalised without proper investigations. Guilty before innocent & will take you off the road and move back court dates over and over	We believe investigations are conducted and appropriate enforcement action taken where required. The Council have no control of Court dates, this is a matter for the Courts Service.
Are actions and appeals comprehensive and inclusive? - Reason:	The appeals process is unclear, lacks defined timelines, and does not guarantee a fair hearing before suspension or penalty. This risks excluding and unjustly penalising drivers. Appeals must be transparent, timely, and accessible to all.	Appeals relating to a licensing determination are listed within the Policy and remain unchanged from the existing policy. All such appeals are via an appeal application to the Magistrates courts in the first instance. As appeals are administered through the courts the Council is unable to indicate such appeal timescales. All such appeals are subject to full transparency of any legal procedural hearing. Appeals are open to all via the courts application processes.
Vehicle carbon emissions and	Too soon and we can't afford electric cars	At this time the Council remains committed to the 2030 zero emission target, however, we have

carbon reduction policies.		comitted to review the Policy in 2029 to take account of any changes.
Vehicle carbon emissions and carbon reduction policies.	Current target not feasible No suitable vehicles for saloon cars that give adequate range and are very costly the used EV market is unknown. plus driving condition always changing ie weather and roads No suitable WAVs at all in the current market that are cost appropriate	At this time the Council remains committed to the 2030 zero emission target, however, we have comitted to review the Policy in 2029 to take account of any changes. The age limit for ICE and hybrid WAV have been increased following driver feedback regarding the lack of availability of electric WAV.
Vehicle carbon emissions and carbon reduction policies.	We need better infrastructure	At this time the Council remains committed to the 2030 zero emission target, however, we have comitted to review the Policy in 2029 to take account of any changes.
Vehicle carbon emissions and carbon reduction policies.	Such as many other councils in the UK these should be postolponed or given longer dates for deadline as 2030 is not accurate or realistically possible	At this time the Council remains committed to the 2030 zero emission target, however, we have comitted to review the Policy in 2029 to take account of any changes.
Vehicle carbon emissions and carbon reduction policies.	Not ready for that no feslity	At this time the Council remains committed to the 2030 zero emission target, however, we have comitted to review the Policy in 2029 to take account of any changes.
Vehicle carbon emissions and carbon reduction policies.	Current target not feasible No suitable vehicles for saloon cars that give adequate range and are very costly the used EV market is unknown. plus driving condition always changing ie weather and roads No suitable WAVs at all in the current market that are cost appropriate	Repeat comment see line 100 for response.
Vehicle carbon emissions and carbon reduction policies.	Feasibility & Cost: The push towards electric or hydrogen vehicles, especially for wheelchair-accessible taxis (WAVs), is currently not feasible. Such vehicles are either not readily available in the market or are prohibitively expensive. Even conventional petrol and diesel WAVs are difficult to source. Lack of Infrastructure: There is a severe lack of adequate local infrastructure, including charging points for electric vehicles and, critically, hydrogen refuelling stations. Without this essential infrastructure, such a mandate is premature and impractical. Range anxiety is a significant concern for drivers. Driver Request: We strongly urge the Council to defer the implementation of this policy until at least 2030. This will allow sufficient time for affordable 3 vehicle options to become available and for the necessary charging/refuelling infrastructure to be established locally. A fare increase specifically for 5+ ecological vehicles would be a reasonable consideration once this becomes viable.	Following the consultation we have increased the age limit for WAV from 10 to 15 years for ICE vehicles 20 years for Hybrid and Electric and Hydrogen remain unlimited.

Vehicle carbon emissions and carbon reduction policies.	the 2030 zero-emission target is unrealistic, as current EV technology does not meet the operational needs of taxi work in terms of range, charging times, and performance in varying weather and road conditions. Affordable long-range saloon models are not available, the used EV market is unproven, and there are no cost-appropriate electric wheelchair-accessible vehicles, making the target impractical without a phased transition supported by suitable vehicles, infrastructure, and funding.	The Council is still committed at this time to net zero by 2030. However, following the consultation the age limits for all vehicles has been increased. Electric and Hydrogen vehicles age limits remain unlimited to encourage drivers to move to these types of vehicle.
Vehicle carbon emissions and carbon reduction policies.	I think these targets are unrealistic and can not be achieved, vehicles are much too expensive and the range they offer are just impractical for the trade, they can potentially work in cities but not here	See comment above.
Vehicle carbon emissions and carbon reduction policies.	I think these targets are unrealistic and can not be achieved, vehicles are much too expensive and the range they offer are just impractical for the trade, they can potentially work in cities but not here	Repeat comment see line 107 for response
Vehicle carbon emissions and carbon reduction policies.	Not feasible	No relevant response can be provided.
Vehicle carbon emissions and carbon reduction policies.	Setting targets which can not be achieved makes no sense	The Council remains at this time committed to its 2030 zero emission target. However, we have increased the age of all vehicles post consultation.
Vehicle carbon emissions and carbon reduction policies.	I think these targets are unrealistic and can not be achieved, vehicles are much too expensive and the range they offer are just impractical for the trade, they can potentially work in cities but not here	We have increased the age of all vehicles post consultation, incentives for adoption of cleaner vehicles remain as the Council see has a net zero target for 2030.
Vehicle carbon emissions and carbon reduction policies.	I think these targets are unrealistic and can not be achieved, vehicles are much too expensive and the range they offer are just impractical for the trade, they can potentially work in cities but not here	Repeat comment see line 111 for response
Vehicle carbon emissions and carbon reduction policies.	I think these targets are unrealistic and can not be achieved, vehicles are much too expensive and the range they offer are just impractical for the trade, they can potentially work in cities but not here	Repeat comment see line 111 for response
Vehicle carbon emissions and	Current target not feasible No suitable vehicles for saloon cars that give adequate range and are very costly the used EV market is unknown. plus driving condition	The age limit for Saloon ICE vehicles has been increased from 10 to 12 years and ICE WAV have been increased from 10 to 15 years.

carbon reduction policies.	always changing ie weather and roads No suitable WAVs at all in the current market that are cost appropriate	
Vehicle carbon emissions and carbon reduction policies.	I think these targets are unrealistic and can not be achieved, vehicles are much too expensive and the range they offer are just impractical for the trade, they can potentially work in cities but not here	Repeat comment see line 111 for response
Vehicle carbon emissions and carbon reduction policies.	Net 2030 not feasible nothing on the current market out there and no help or funds from council just want more money of us. Ev range is a lie. More costly & life on cars is around 5 years and can't do the same Milage across the board	The Council remains at this time committed to its 2030 zero emission target. We have increased the age of all vehicles post consultation. We cannot comment on manufacturers claimed EV ranges.
Vehicle carbon emissions and carbon reduction policies.	The infrastructure for electric only vehicles is 30 years behind in my opinion. The council should encourage petrol hybrid vehicles for taxis.	The age limit for all vehicles has been increased.
Vehicle carbon emissions and carbon reduction policies.	The target is unrealistic without affordable EV/hydrogen vehicles, adequate charging points, and viable WAV options. Forcing early adoption risks reducing fleet size, increasing costs, and harming service availability. Targets should be phased and supported by infrastructure and funding	We appreciate the feedback we have received regarding this, and we have increased the age limit of all vehicles.
Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	Increase in age would assist drivers	Following feedback from the consultation and in person events, the age limits for vehicles has been increased.
Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	New cars are expensive	To address this the age limit of vehicles has been increased.
Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	It should not be exclusively for just electric, hybrid or hydrogen It should be for all type as not easy to acquire even in current climate	The age limits for vehicles has been increased post consultation.

Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	There are only licensing authorities within Cherwell that operate and have different vehicle age which should be equal to all council policies and regulations	We have increased the age limit for all vehicles post consultation. However, we see the incentives to change to cleaner vehicles as important, so we continue to reserve the unlimited age limit to zero emission vehicles.
Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	Not able to afford the electric vehicles so feel more time is needed for the change to take place.	We have increased the age limit of ICE vehicles, and have committed to reviewing the zero emission requirement before 2030.
Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	Should be for all	We have increased the age limit for all vehicles post consultation. However, we see the incentives to change to cleaner vehicles as important, so we continue to reserve the unlimited age limit to zero emission vehicles.
Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	It should not be exclusively for just electric, hybrid or hydrogen It should be for all type as not easy to acquire even in current climate	We have increased the age limit for all vehicles post consultation. However, we see the incentives to change to cleaner vehicles as important, so we continue to reserve the unlimited age limit to zero emission vehicles.
Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	Statement Regarding Age Limits for Wheelchair Accessible Vehicles (WAVs) We support keeping the current rule that wheelchair accessible vehicles (WAVs) must be no more than 6 years old when entering service. However, we propose extending the upper age limit for WAVs in service to 12 years. This change would allow drivers to operate safe, reliable, and affordable vehicles for longer, while still ensuring that vehicles entering the fleet meet modern safety and accessibility standards. In my opinion, the entry age limit should remain the same, but the maximum age should be increased to 12 years to give drivers more flexibility and reduce financial pressure.	The age limit for ICE WAV has been increased from 10 to 15 years.
Do you agree with the changes to the age of vehicle licensing changes?	The proposed changes in Appendices C are too restrictive. Limiting non-wheelchair-accessible private hire vehicles to a maximum of 6 years old at first registration and licensing them only until 10 years from first registration disregards the fact that many modern vehicles remain safe and efficient well beyond this period. While exemptions for electric, hybrid, or hydrogen-powered wheelchair-	Age limits have been increased for all vehicles, and the 6 year requirement at first vehicle licence has been removed.

(Appendices C). - Reason:	accessible vehicles are noted, the lack of affordable and suitable models in the current market makes these provisions impractical for many operators.	
Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	vehcile ages is not the problem, my problem is purchase of a car to meet this criteria, why cant i purchase a car that is 8 years old and drive it for 2 years? other councils are definitely more lenient on this and enjoying the benefits of it.	The requirement to be a maximum of 6 years old at first vehicle licence has been removed.
Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	vehicle ages is not the problem, my problem is purchase of a car to meet this criteria, why cant i purchase a car that is 8 years old and drive it for 2 years? other councils are definitely more lenient on this and enjoying the benefits of it.	Repeat comment see line 128 for response.
Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	It should not be exclusively for just electric, hybrid or hydrogen It should be for all type as not easy to acquire even in current climate	We believe the incentive of unlimited age limit for zero emissions vehicles is important in meeting the Council's 2030 zero emission target. However, we have increased the age limit for all vehicles.
Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	These changes need to be made to all cars, majority of drivers will not buy electric or hydrogen so who will these changes benefit exactly?	We believe the incentive of unlimited age limit for zero emissions vehicles is important in meeting the Council's 2030 zero emission target. However, we have increased the age limit for all vehicles.
Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	These changes need to be made to all cars, majority of drivers will not buy electric or hydrogen so who will these changes benefit exactly?	Repeat comment see line 131 for response.
Do you agree with the changes to the age of vehicle licensing changes?	vehicle ages is not the problem, my problem is purchase of a car to meet this criteria, why cant i purchase a car that is 8 years old and drive it for 2 years? other councils are definitely more lenient on this and enjoying the benefits of it.	Repeat comment see line 128 for response.

(Appendices C). - Reason:		
Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	vehicle ages is not the problem, my problem is purchase of a car to meet this criteria, why cant i purchase a car that is 8 years old and drive it for 2 years? other councils are definitely more lenient on this and enjoying the benefits of it.	Repeat comment see line 128 for response.
Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	These changes need to be made to all cars, majority of drivers will not buy electric or hydrogen so who will these changes benefit exactly?	The age limits for vehicles have been increased post consultation.
Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	It should not be exclusively for wavs all cars across board,	The age limits for vehicles have been increased post consultation.
Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	I think vehicles should be run for 12 years and waves for 15 years! A 10year old taxi is not old.. other council vehicles are 15-20 years old and still licensed, I've seen a few myself over the years	The age limits for vehicles have been increased post consultation.
Do you agree with the changes to the age of vehicle licensing changes? (Appendices C). - Reason:	The proposed limits are too restrictive, stricter than neighbouring councils, and ignore that many older vehicles are kept in excellent condition. A condition-based approach would meet safety needs without unnecessary financial pressure or encouraging drivers to licence elsewhere	The age limits for all vehicles have been increased post consultation.
Do you agree with the changes to wheelchair accessible vehicle licensing?	I'm a chauffeur so w scant have wheel chair access	N/A

(Appendices C). - Reason:		
Do you agree with the changes to wheelchair accessible vehicle licensing? (Appendices C). - Reason:	WAVs are being favoured over saloon cars Even when there's not enough requirements for them and are incentivized	N/A
Do you agree with the changes to wheelchair accessible vehicle licensing? (Appendices C). - Reason:	There are enough already available so change needed	We want to ensure there remains enough WAV for the deamand and so the incentives of increaed age is important.
Do you agree with the changes to wheelchair accessible vehicle licensing? (Appendices C). - Reason:	Not enough demand	I believe this comment is in relation to the 20% WAV for Operators in the policy that was consulted on. The Operator requirement for 20% of vehicles to be WAV, has been amended, the requirement will now be 1 WAV for each 20 vehicles registered with each Operator.
Do you agree with the changes to wheelchair accessible vehicle licensing? (Appendices C). - Reason:	WAVs are being favoured over saloon cars Even when there's not enough requirements for them and are incentivized	N/A
Do you agree with the changes to wheelchair accessible vehicle licensing? (Appendices C). - Reason:	Wwhile Appendices C proposes extended licensing for wheelchair-accessible vehicles (WAVs) — including exemptions from the 6-year first registration rule for petrol/diesel WAVs, a 15-year limit for electric hybrid WAVs, and no age limit for fully electric or hydrogen WAVs — these changes are not practical in the current market. There are no cost-appropriate fully electric WAVs available, hybrid and hydrogen models are extremely limited, and infrastructure for alternative fuels is insufficient. In addition, the requirement for operators with 10 or more licensed	We have introduced changes to the policy post consultation, which are in line with this comment.

	vehicles to have at least 20% of their fleet as WAVs by 2028 is unrealistic given the lack of affordable and suitable WAV options, and such a requirement should only apply to larger fleets, such as those with 20 or more vehicles, to avoid placing excessive financial and operational strain on smaller operators	
Do you agree with the changes to wheelchair accessible vehicle licensing? (Appendices C). - Reason:	I believe if we want more wheelchair access vehicles then the new changes should apply to combustion engine vehicles as well as electric and hydrogen	We have listened to the comments and input at the drop in sessions, and we have increased the age limit of WAV.
Do you agree with the changes to wheelchair accessible vehicle licensing? (Appendices C). - Reason:	I believe if we want more wheelchair access vehicles then the new changes should apply to combustion engine vehicles as well as electric and hydrogen	Repeat comment see line 145 for response.
Do you agree with the changes to wheelchair accessible vehicle licensing? (Appendices C). - Reason:	WAVs are being favoured over saloon cars Even when there's not enough requirements for them and are incentivized	The age limit for WAV has been increased beyond Saloon cars as an incentive.
Do you agree with the changes to wheelchair accessible vehicle licensing? (Appendices C). - Reason:	If the aim is to encourage drivers to invest in WAV then setup grants or amend the policy to affect already licensed vehicles. Setting unrealistic targets on operators is unfair and unrealistic.	We are incentivising WAV by increasing the age limit. The Operator requirement for 20% of vehicles to be WAV, has been amended, the requirement will now be 1 WAV for each 20 vehicles registered with each Operator.
Do you agree with the changes to wheelchair accessible vehicle licensing?	I believe if we want more wheelchair access vehicles then the new changes should apply to combustion engine vehicles as well as electric and hydrogen	Repeat comment see line 145 for response.

(Appendices C). - Reason:		
Do you agree with the changes to wheelchair accessible vehicle licensing? (Appendices C). - Reason:	I believe if we want more wheelchair access vehicles then the new changes should apply to combustion engine vehicles as well as electric and hydrogen	Repeat comment see line 145 for response.
Do you agree with the changes to wheelchair accessible vehicle licensing? (Appendices C). - Reason:	I believe if we want more wheelchair access vehicles then the new changes should apply to combustion engine vehicles as well as electric and hydrogen	Repeat comment see line 145 for response.
Do you agree with the changes to wheelchair accessible vehicle licensing? (Appendices C). - Reason:	If the aim is to encourage drivers to invest in WAV then setup grants or amend the policy to affect already licensed vehicles. Setting unrealistic targets on operators is unfair and unrealistic.	The age limits for all WAV has been increased post consultation.
Do you agree with the changes to wheelchair accessible vehicle licensing? (Appendices C). - Reason:	WAVS always being favoured over everything else when there is no demand for it	Due to the cost of WAV we consider that incentives encourage up take of these vehicles. Demand for WAV does exist and it is important these are available for those who need them.
Do you agree with the changes to wheelchair accessible vehicle licensing? (Appendices C). - Reason:	WAV targets are not backed by local demand data and risk reducing standard vehicle numbers. WAVs are costly, less fuel-efficient, and lack adequate rank facilities. Accessibility policy should be evidence-led and supported by incentives	WAV targets for Operators have been reduced following the consultation.

Do you agree with the policy approach to accessibility and inclusion? (Appendices A to D). - Reason:	improvement are required for all parties	Context unclear so can't provide a response.
Do you agree with the policy approach to accessibility and inclusion? (Appendices A to D). - Reason:	improvement are required for all parties	Context unclear so can't provide a response.
Do you agree with the policy approach to accessibility and inclusion? (Appendices A to D). - Reason:	The entire policy needs to be reviewed and rewritten in consultation with current drivers to create a new, balanced approach that is practical, reasonable, and fair for all parties involved.	The Council's policy is largely in line with the DfT guidance, we believe it is balanced and following the consultation we have made amendments after listening to Drivers, who have been properly consulted through the process.
Do you agree with the policy approach to accessibility and inclusion? (Appendices A to D). - Reason:	i believe licensing needs to do more in order to attract drivers to purchase wheelchair access vehicules	To add an incentive for investing in WAV, we are increasing the age limits for WAV.
Do you agree with the policy approach to accessibility and inclusion? (Appendices A to D). - Reason:	i believe licensing needs to do more in order to attract drivers to purchase wheelchair access vehicules	Repeat comment see line 158 for response.
Do you agree with the policy approach to accessibility and inclusion? (Appendices A to D). - Reason:	Improvements needed	Unsure of centext of response, therefore, can't provide a response.

Do you agree with the policy approach to accessibility and inclusion? (Appendices A to D). - Reason:	As mentioned above, licensing needs an approach where by drivers feel rewarded for investing in WAVs and the current policy simply doesn't address the issues at hand.	To add an incentive for investing in WAV, we are increasing the age limits for WAV.
Do you agree with the policy approach to accessibility and inclusion? (Appendices A to D). - Reason:	As mentioned above, licensing needs an approach where by drivers feel rewarded for investing in WAVs and the current policy simply doesn't address the issues at hand.	Repeat comment see line 161 for response.
Do you agree with the policy approach to accessibility and inclusion? (Appendices A to D). - Reason:	i believe licensing needs to do more in order to attract drivers to purchase wheelchair access vehciles	The age limit for all WAV has been increased, as an incentive this has been increased beyond the increase in age liimit for other ICE vehicles.
Do you agree with the policy approach to accessibility and inclusion? (Appendices A to D). - Reason:	i believe licensing needs to do more in order to attract drivers to purchase wheelchair access vehciles	Repeat comment see line 163 for response.
Do you agree with the policy approach to accessibility and inclusion? (Appendices A to D). - Reason:	As mentioned above, licensing needs an approach where by drivers feel rewarded for investing in WAVs and the current policy simply doesn't address the issues at hand.	As an incentive we have increased the age limit of WAV ICE vehicles to 15 years, for other ICE vehicles it has been increased but to 12 years.
Do you agree with the policy approach to accessibility and inclusion? (Appendices A to D). - Reason:	Improvement required for all parties	Unsure of exact centext of response, therefore, can't provide a response.

Do you agree with the policy approach to accessibility and inclusion? (Appendices A to D). - Reason:	The approach overemphasises WAV targets without balancing the needs of all passengers. Accessibility should be based on demand evidence, maintain a mix of vehicle types, and be supported by infrastructure and funding	The target for Operators for WAV has been amended following the consultation.
Any further details to add to appendices A to I? - Reason:	Cross-Border Private Hire Vehicles (Specifically but not limited to Wolverhampton Licensed Drivers) Unfair Competition & Illegal Plying for Hire: We are deeply concerned about the increasing presence of Wolverhampton-licensed private hire vehicles operating in our area, particularly in the town centre (High Street, Caltrop Street, and George Street). These drivers are actively offering rides to customers directly from these locations, which is a clear breach of private hire regulations as they are effectively plying for hire without a pre-booking. This severely impacts the business of our locally licensed members. Safety & Enforcement Issues: As these drivers are not licensed by our local authority, they are not subject to the same regular checks or monitoring, raising serious issues around enforcement, public safety, and fairness. Driver Request: We respectfully request the Council take urgent action to address this matter. Specifically, we suggest the implementation of a geofence for private hire vehicles that restricts them from parking or operating near these key areas unless they have a legitimate, pre-booked job. This will help maintain fair competition, protect local businesses, and ensure compliance with taxi and private hire legislation. Greater parking enforcement is also required in these areas.	The existing Taxi licensing policy requires all licensed operators ensure that vehicles and drivers used for their hire and reward bookings are suitably licensed and safe and suitable. A driver and vehicle which has been licensed by another authority as a Hackney Carriage driver and vehicle has been assessed as both meeting the legal requirements of that license, and being safe and suitable to hold or retain such a license. The law allows a Hackney carriage driver/vehicle to work as a Private hire vehicle/driver outside of their licensed area, and as such the Authority are unable to prevent such legal activities. Cherwell Licensing have no reported incidents or evidence of Hackney vehicle/drivers licensed by another authority plying for hire within Cherwell, and would take appropriate and proportionate enforcement action in such circumstances. All licensed operators are licensed with conditions which manages licensed vehicle parking within the vicinity of an operator.
Any further details to add to appendices A to I? - Reason:	The current plate exemption process is unnecessarily burdensome, requiring yearly renewals that create excessive administrative work for operators and unnecessary disruption to business operations. This repeated process also inconveniences clients, who may feel harassed by ongoing checks and restrictions, despite no changes in their service needs or compliance record. A more reasonable approach would be to grant plate exemptions for a longer term, such as 5 years, which would reduce bureaucracy, provide stability for operators, and maintain customer confidence, while still allowing the council to conduct compliance checks or revoke exemptions in cases of genuine breaches. We would introduce an alternative identification method, for example, a discreet window sticker similar to those used by London private hire vehicles, instead of the bulky plates and door signs. Additionally, the requirement for both drivers and licensed	Discreet license plate are only issued to a vehicle. Vehicles are only licensed for a maximum of one year under legislative requirements. A plate exemption can only be issued for the licensed period, and are reliant on evidence of current contractual requirements needing a plate exemption, as such the authority is unable to issue a plate exemption which would exceed the license of a vehicle, or which does not have contractual requirements of a plate exemption. Displaying a vehicle license plate is not only a requirement of the legislation, it also acts as a

	operators to complete, document, and retain a daily vehicle check is unrealistic to maintain in practice, and should be changed to a weekly or monthly check to ensure compliance without placing an excessive and impractical burden on operators and drivers	safeguarding tool for the public, allowing them to clearly identify safe licensed vehicles as taxis.
Any further details to add to appendices A to I? - Reason:	Why are the trade not consulted when these changes are being proposed, even at the consultation meetings a lot of valid points were made however we are told every driver needs to complete this survey independently, it just seems a complete waste of everyone's time	The consultation is so the public and trade can put their views on the changes across. Those who attended the drop in events were encouraged to also fill in the on-line survey, so their view could be put on record. This does not mean the points and areas raised in the drop in events were ignored and only the survey results taken into account, all views have been taken into account.
Any further details to add to appendices A to I? - Reason:	Why are the trade not consulted when these changes are being proposed, even at the consultation meetings a lot of valid points were made however we are told every driver needs to complete this survey independently, it just seems a complete waste of everyone's time	Repeat comment, see line 170 for response
Any further details to add to appendices A to I? - Reason:		N/A
Any further details to add to appendices A to I? - Reason:	Why are the trade not consulted when these changes are being proposed, even at the consultation meetings a lot of valid points were made however we are told every driver needs to complete this survey independently, it just seems a complete waste of everyone's time. If this policy is pushed through operators will be forced to employ more staff in order to be compliant, drivers will be forced off the road, eventually drivers will turn to other councils or stop driving altogether and this will affect both the public and companies like us who will not be able to meet the demand.	The consultation is so the public and trade can put their views on the changes across. Those who attended the drop in events were encouraged to also fill in the on-line survey, so their view could be put on record. This does not mean the points and areas raised in the drop in events were ignored and only the survey results taken into account, all views have been taken into account. Following the consultation changes have been made, the WAV requirement has been relaxed to reflect the feedback given. The requirement for Operators to collect the daily checks from drivers has also been changed, so now the records need to be available to them on request.

<p>Any further details to add to appendices A to I? - Reason:</p>	<p>I am writing on behalf of myself and several other licensed operators to formally oppose the proposed changes outlined in the Taxi Licensing Policy Consultation 2025. While we understand the need to update policies to meet legislative requirements and improve safety, we strongly believe that the current proposals are unrealistic, financially burdensome, and logistically unfeasible for many operators in Cherwell. The taxi trade in our area is already suffering, with many drivers forced to seek alternative employment in sectors such as food and parcel deliveries just to make ends meet. The introduction of the mandatory 6-month vehicle inspections, significant fee increases, and stringent vehicle and driver requirements is placing additional financial strain on an industry already in decline. These new measures could push even more operators and drivers to leave the trade, exacerbating the issue of driver shortages and potentially leading to fewer options for local residents in need of transport. Many drivers are already struggling to recover from the financial challenges posed by the pandemic, the cost-of-living crisis, and the ongoing economic pressures. We fear that these proposed changes will accelerate the decline of the taxi industry in Cherwell, making it even harder for operators to remain competitive and profitable. We respectfully urge the Council to reconsider these proposals, as they risk pushing the industry into further decline rather than fostering growth and improving services. In this response, we outline specific aspects of the policy that we believe are unrealistic, unfair, and unsustainable and ask that the Council collaborate with operators to create a policy that balances public safety, driver welfare, and the viability of the local taxi trade.</p> <p>1. 6-Month Vehicle Inspections at Council Depot The proposal to replace the current mid-license MOT test with mandatory vehicle inspections at the council-owned depot every six months is, in our view, unrealistic and excessively expensive for many operators. While vehicle safety is paramount, this change presents several challenges:</p> <ul style="list-style-type: none"> • Logistical Challenges: The requirement for vehicles to be inspected at the council depot every six months will cause significant disruption to our day-to-day operations. For smaller operators who rely on flexible working hours, scheduling inspections at a centralised location during business hours is impractical and time-consuming. • Financial Burden: The cost of these inspections, including potential downtime and travel expenses, will place a significant financial strain on operators. Unlike the current system, where inspections can be arranged locally, operators will now be forced to pay higher costs and manage additional travel time. • Impact on Small Operators: Many of our vehicles are in good working condition but may not require council-led inspections every six months. The added expense and administrative burden could drive smaller operators out of business, particularly those already struggling with rising 	<p>The Council led inspections are not every 6 months, they will be mid license term so 6 months into each 12 month vehicle license. With a normal MOT every 12months, which can be done at any MOT garage of the drivers choosing. The cost of the Council led inspections will not exceed the government published cost for MOT's. We have moved the implementation date for the Council led inspections from the 1st January 2026 to the 1st April 2026, to allow for testing capacity and functionality assessments prior to implementation. Applications for DBS checks via TaxiPlus are priced lower than Cherwell's cost for completing these in person and in paper form. TaxiPlus allows for drivers to complete an online application, which is quicker than the Council's old paper based method, which required drivers to visit the Council Officers by appointment. The TaxiPlus system is used by many other Council's and has become a trusted system for completeing DBS applications, we are not aware of any other similar provider for this service. Vehicle ages have been increased for all vehicles post consultation. We have reduced the WAV requirement for Operators following the consultation and changed the requirement for Operators to get the documented safety checks from drivers. With regard to fees, the taxi license fees charged by Cherwell District Council are in line or less than other Oxfordshire Authorities, which we consider to be the closest comparison. Also note the fees quoted for authorities in Northamptonshire are 24/25 fees. The change to the duration of penalty points remaining is in line with DfT guidance. We do not accept the suggestion that drivers will be penalised by totting up points as they remain on their license for longer. Points are designed not just as punishment but also as a deterrent to future non-compliances. The policy has been amended to require drivers to have held a</p>
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	<p>costs. We urge the Council to reconsider this requirement and instead allow inspections to be carried out by approved third-party garages or continue with the current MOT system. If the Council insists on depot inspections, we ask for a subsidized cost to ensure smaller operators can comply without undue financial hardship.</p> <p>2. DBS Checks via Taxi Plus Only The mandatory requirement to process DBS checks exclusively through Taxi Plus is another point of concern. Restricting this to a single provider could lead to:</p> <ul style="list-style-type: none"> • Increased costs due to lack of competition. • Delays in processing, which could disrupt business operations. <p>We recommend allowing flexibility for operators to choose from a list of approved providers, ensuring faster processing and maintaining competitive pricing.</p> <p>3. Vehicle Age Restrictions (Non-WAV Vehicles) The proposed restrictions on vehicle age, particularly for non-wheelchair accessible vehicles (WAVs), are too restrictive and do not account for the financial realities of small operators. The cost of purchasing new vehicles is increasingly prohibitive, and we recommend relaxing these age limits or providing financial support for operators transitioning to newer vehicles.</p> <p>4. 20% WAV Fleet by 2028 The proposed requirement that operators with 10 or more licensed vehicles must ensure 20% of their fleet is wheelchair accessible by 2028 is, in our view, completely unrealistic under current market conditions. At present, there are no WAVs within the licensed private hire fleet in Cherwell. Expecting operators to go from 0% to 20% WAVs in under three years is not only unrealistic but financially and logistically impossible for most operators without substantial support.</p> <ul style="list-style-type: none"> • Cost Barrier: WAVs are significantly more expensive to purchase, insure, and maintain than standard vehicles. Without grants or financial assistance, few private hire operators will be able to afford to transition even one vehicle—let alone meet a 20% threshold. • Lack of Demand & Use Cases: In the private hire sector, WAV usage is low due to limited demand from customers booking via apps or phone. It is unclear how this policy aligns with actual passenger needs in the area. • Unclear Enforcement: It is not clear how this percentage will be enforced, or what the consequences will be if an operator cannot meet it. Operators need this information well in advance to make long-term fleet decisions. We are asking the Council to explain: <ul style="list-style-type: none"> • Why this 20% requirement was chosen, given the starting point is 0%. • Whether financial support will be available to assist operators in acquiring WAVs. • What alternatives are available if the target cannot be met. <p>Without further consultation, this requirement is unachievable and risks penalising operators for circumstances beyond their control.</p> <p>5. Reporting Driver Income and Self-Employed Status One specific concern we would like clarification on is the requirement for reporting drivers' income, as outlined in the consultation. As self-employed individuals, drivers do not work under an employment contract, and</p>	<p>driving licence for 12 consecutive months rather than 3 years.</p>
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therefore, we are unsure about our responsibility to track and report their earnings to HMRC. The Council has mentioned that operators must comply with the "Reporting Rules for Digital Platforms", which would require us to report driver income annually. • Clarification Needed: How are we, as operators, supposed to track and report income for self-employed drivers, especially when drivers are responsible for their own tax filings and National Insurance contributions? Should we be collecting income data from drivers directly, and if so, how will this process be administratively managed? This aspect of the policy needs further explanation and guidance to ensure operators can comply without excessive administrative burden.

6. Financial Impacts and General Feasibility The combined effect of these proposals—especially the 6-month inspections, vehicle age restrictions, and reporting requirements—will place an enormous financial burden on operators. Many are already struggling with rising operational costs and the aftermath of the pandemic, and these changes will only exacerbate the situation. We strongly believe that these regulations are unrealistic for the majority of operators and urge the Council to revisit them with a view toward practicality and fairness.

7. 5-Year Penalty Points System for Drivers and Operators We also wish to challenge the proposal that licensing penalty points will remain attached to a driver's license for up to 3 years and to a licensed operator's record for up to 5 years, even if those points are still valid at the time of license renewal. This extended period for penalty points is overly harsh and unfairly penalises operators and drivers, particularly given the nature of the taxi industry. • Unfair Impact on Renewals: Operators and drivers rely on renewal opportunities to continue earning a living. The fact that penalty points will remain on the record for up to five years means that even minor infractions could affect future earnings, potentially limiting business opportunities and even making some drivers and operators ineligible for future licensing. • Lack of Proportionality: Not all penalty points reflect serious or ongoing issues with an individual's conduct. For example, a driver may have accumulated points for a small, isolated incident, yet the policy would treat this the same as more serious or repeated violations. A proportional approach is needed to ensure that points reflect the seriousness of the offence, with a reasonable timeframe for rehabilitation. • Failure to Consider Changing Circumstances: People change, and businesses evolve. A policy that enforces long-term penalties for offences that may have occurred under different circumstances or when individuals were new to the industry does not allow for rehabilitation. It penalises growth and improvement, making it more difficult for individuals to rebuild their careers or businesses after a mistake or a minor violation.

8. Increasing Licensing Costs and Declining Service Quality Another point we would like to raise concerns the annual increase in the

cost of driver badges and vehicle licenses. Over the years, we have seen an annual increase in fees, yet the quality of service from the licensing team appears to be deteriorating, rather than improving. Drivers and operators now face significant challenges, including:

- Lack of Access to Licensing Staff: Drivers and operators are unable to contact or speak directly with licensing officers. This lack of communication is frustrating, especially when operators are attempting to resolve urgent licensing issues or need clarification on policy changes.
- Limited In-Person Service: There is a lack of in-person services available for those who need to visit the office for assistance or to submit documentation. This situation has worsened over the past few years and is affecting the operational efficiency of many businesses. Given these service issues, we question why the Council continues to raise licensing fees without showing any improvement in the services provided. It seems disproportionate that operators are expected to pay more for services that are becoming less accessible and less responsive. We urge the Council to reconsider the annual fee increases and ensure that the licensing team can meet their service level agreements (SLAs) and offer a better standard of service to operators.

9. Cost of Taxi Licenses – Comparison with Other Local Councils

Another key issue is the ongoing increase in licensing costs in Cherwell, particularly in comparison to neighbouring local councils. The rise in fees for driver badges and vehicle licenses has already placed a significant burden on operators, and many are questioning the value they receive in return for these rising costs. Here's a comparison of the license fees across several neighbouring councils:

- Cherwell District Council: o Private Hire Driver Badge Renewal: £284.74 o Private Hire Vehicle License Renewal: £306.80
- Daventry Borough Council: o Private Hire Driver Badge Renewal: £187 o Private Hire Vehicle License Renewal: £161
- South Northants Council: o Private Hire Driver Badge Renewal: £200 o Private Hire Vehicle License Renewal: £250
- Wolverhampton City Council: o Private Hire Driver Badge Renewal: £98 o Private Hire Vehicle License Renewal: £125

As shown above, Cherwell's fees are significantly higher than those of Wolverhampton—a council that has become a preferred choice for many drivers and operators due to its lower fees, simpler application processes, and flexible requirements. Wolverhampton, for example, only requires 1 year of driving experience, does not require a knowledge test, and the costs for driver badges and vehicle plates are far more affordable than those in Cherwell. Moreover, Daventry Borough Council and South Northants Council offer comparable services but at much lower prices, making it evident that Cherwell's licensing fees are out of line with its neighbours. The rising costs in Cherwell, combined with the proposed policy changes, may encourage more drivers and operators to look outside the district for better conditions, which

could have long-term detrimental effects on the local taxi trade. 10. 3 Years Driver Experience Requirement – Comparison with Wolverhampton We also have concerns regarding the minimum 3-year driving experience requirement that Cherwell District Council have in place. This is significantly higher than what is required by other councils, such as Wolverhampton, which only mandates 1 year of driving experience for taxi and private hire drivers. The more stringent 3-year requirement in Cherwell could lead to a loss of drivers to neighbouring councils like Wolverhampton, where the entry requirements are less restrictive and the cost of operating a taxi is considerably lower. In Wolverhampton, drivers can enter the industry with just 1 year of driving experience, and the associated costs for driver badges and taxi plates are notably cheaper than those in Cherwell. Additionally, Wolverhampton does not require a knowledge test, which further eases the entry process for drivers. As a result, Cherwell risks losing a significant number of experienced drivers who may choose to relocate to Wolverhampton, where the process is more accessible and financially viable. This could result in a reduced pool of available drivers within Cherwell, affecting the overall supply and demand balance, potentially leading to longer wait times for passengers and reduced competition within the local market. We ask the Council to justify the need for a 3-year driving experience requirement when Wolverhampton has shown that a 1-year experience is sufficient to maintain high standards and ensure public safety. Furthermore, we would like to know what steps the Council plans to take to prevent the outflow of drivers to more flexible, competitive councils like Wolverhampton. It is crucial that any new policy implemented is not only feasible but fair to the people it affects—taxi operators, drivers, and local communities. The taxi trade plays a vital role in providing essential transport services, and Cherwell's local economy depends on a viable and sustainable industry. By imposing overly stringent regulations, high fees, and excessive vehicle requirements, the proposed policy may inadvertently harm the very people the Council seeks to protect, leading to greater unemployment, higher fares, and reduced service availability. We call on the Council to re-evaluate the proposed changes with a focus on ensuring that they are both realistic and balanced, particularly in light of the current challenges facing the taxi trade. Rather than adopting a one-size-fits-all approach, we urge the Council to work collaboratively with operators to find pragmatic solutions that can improve public safety while preserving the livelihoods of those who serve the local community. The local taxi industry is at a critical crossroads, and the Council has an opportunity to support and sustain it through a more thoughtful, flexible policy—one that allows the trade to thrive rather than diminish. We ask that you reconsider the most harmful elements of this proposal,

	<p>take our concerns seriously, and work with the community to build a policy that is fair, practical, and achievable for all stakeholders. We appreciate your time in considering this response and respectfully ask that the Council address the points we've raised in a manner that ensures fairness, practicality, and the continued viability of taxi and private hire businesses in Cherwell.</p>	
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<p>Any further details to add to appendices A to I? - Reason:</p>	<p>I am writing on behalf of myself and several other licensed operators to formally oppose the proposed changes outlined in the Taxi Licensing Policy Consultation 2025. While we understand the need to update policies to meet legislative requirements and improve safety, we strongly believe that the current proposals are unrealistic, financially burdensome, and logistically unfeasible for many operators in Cherwell. The taxi trade in our area is already suffering, with many drivers forced to seek alternative employment in sectors such as food and parcel deliveries just to make ends meet. The introduction of the mandatory 6-month vehicle inspections, significant fee increases, and stringent vehicle and driver requirements is placing additional financial strain on an industry already in decline. These new measures could push even more operators and drivers to leave the trade, exacerbating the issue of driver shortages and potentially leading to fewer options for local residents in need of transport. Many drivers are already struggling to recover from the financial challenges posed by the pandemic, the cost-of-living crisis, and the ongoing economic pressures. We fear that these proposed changes will accelerate the decline of the taxi industry in Cherwell, making it even harder for operators to remain competitive and profitable. We respectfully urge the Council to reconsider these proposals, as they risk pushing the industry into further decline rather than fostering growth and improving services. In this response, we outline specific aspects of the policy that we believe are unrealistic, unfair, and unsustainable and ask that the Council collaborate with operators to create a policy that balances public safety, driver welfare, and the viability of the local taxi trade.</p> <p>1. 6-Month Vehicle Inspections at Council Depot The proposal to replace the current mid-license MOT test with mandatory vehicle inspections at the council-owned depot every six months is, in our view, unrealistic and excessively expensive for many operators. While vehicle safety is paramount, this change presents several challenges:</p> <ul style="list-style-type: none"> • Logistical Challenges: The requirement for vehicles to be inspected at the council depot every six months will cause significant disruption to our day-to-day operations. For smaller operators who rely on flexible working hours, scheduling inspections at a centralised location during business hours is impractical and time-consuming. • Financial Burden: The cost of these inspections, including potential downtime and travel expenses, will place a significant financial strain on operators. Unlike the current system, where inspections can be arranged locally, operators will now be forced to pay higher costs and manage additional travel time. • Impact on Small Operators: Many of our vehicles are in good working condition but may not require council-led inspections every six months. The added expense and administrative burden could drive smaller operators out of business, particularly those already struggling with rising 	<p>Repeat comment see line 174 for response</p>
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costs. We urge the Council to reconsider this requirement and instead allow inspections to be carried out by approved third-party garages or continue with the current MOT system. If the Council insists on depot inspections, we ask for a subsidized cost to ensure smaller operators can comply without undue financial hardship.

2. DBS Checks via Taxi Plus Only The mandatory requirement to process DBS checks exclusively through Taxi Plus is another point of concern. Restricting this to a single provider could lead to:

- Increased costs due to lack of competition.
- Delays in processing, which could disrupt business operations.

We recommend allowing flexibility for operators to choose from a list of approved providers, ensuring faster processing and maintaining competitive pricing.

3. Vehicle Age Restrictions (Non-WAV Vehicles) The proposed restrictions on vehicle age, particularly for non-wheelchair accessible vehicles (WAVs), are too restrictive and do not account for the financial realities of small operators. The cost of purchasing new vehicles is increasingly prohibitive, and we recommend relaxing these age limits or providing financial support for operators transitioning to newer vehicles.

4. 20% WAV Fleet by 2028 The proposed requirement that operators with 10 or more licensed vehicles must ensure 20% of their fleet is wheelchair accessible by 2028 is, in our view, completely unrealistic under current market conditions. At present, there are no WAVs within the licensed private hire fleet in Cherwell. Expecting operators to go from 0% to 20% WAVs in under three years is not only unrealistic but financially and logistically impossible for most operators without substantial support.

- Cost Barrier: WAVs are significantly more expensive to purchase, insure, and maintain than standard vehicles. Without grants or financial assistance, few private hire operators will be able to afford to transition even one vehicle—let alone meet a 20% threshold.
- Lack of Demand & Use Cases: In the private hire sector, WAV usage is low due to limited demand from customers booking via apps or phone. It is unclear how this policy aligns with actual passenger needs in the area.
- Unclear Enforcement: It is not clear how this percentage will be enforced, or what the consequences will be if an operator cannot meet it. Operators need this information well in advance to make long-term fleet decisions. We are asking the Council to explain:
- Why this 20% requirement was chosen, given the starting point is 0%.
- Whether financial support will be available to assist operators in acquiring WAVs.
- What alternatives are available if the target cannot be met.

Without further consultation, this requirement is unachievable and risks penalising operators for circumstances beyond their control.

5. Reporting Driver Income and Self-Employed Status One specific concern we would like clarification on is the requirement for reporting drivers' income, as outlined in the consultation. As self-employed individuals, drivers do not work under an employment contract, and

therefore, we are unsure about our responsibility to track and report their earnings to HMRC. The Council has mentioned that operators must comply with the "Reporting Rules for Digital Platforms", which would require us to report driver income annually. • Clarification Needed: How are we, as operators, supposed to track and report income for self-employed drivers, especially when drivers are responsible for their own tax filings and National Insurance contributions? Should we be collecting income data from drivers directly, and if so, how will this process be administratively managed? This aspect of the policy needs further explanation and guidance to ensure operators can comply without excessive administrative burden.

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cost of driver badges and vehicle licenses. Over the years, we have seen an annual increase in fees, yet the quality of service from the licensing team appears to be deteriorating, rather than improving. Drivers and operators now face significant challenges, including:

- Lack of Access to Licensing Staff: Drivers and operators are unable to contact or speak directly with licensing officers. This lack of communication is frustrating, especially when operators are attempting to resolve urgent licensing issues or need clarification on policy changes.
- Limited In-Person Service: There is a lack of in-person services available for those who need to visit the office for assistance or to submit documentation. This situation has worsened over the past few years and is affecting the operational efficiency of many businesses. Given these service issues, we question why the Council continues to raise licensing fees without showing any improvement in the services provided. It seems disproportionate that operators are expected to pay more for services that are becoming less accessible and less responsive. We urge the Council to reconsider the annual fee increases and ensure that the licensing team can meet their service level agreements (SLAs) and offer a better standard of service to operators.

9. Cost of Taxi Licenses – Comparison with Other Local Councils

Another key issue is the ongoing increase in licensing costs in Cherwell, particularly in comparison to neighbouring local councils. The rise in fees for driver badges and vehicle licenses has already placed a significant burden on operators, and many are questioning the value they receive in return for these rising costs. Here's a comparison of the license fees across several neighbouring councils:

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As shown above, Cherwell's fees are significantly higher than those of Wolverhampton—a council that has become a preferred choice for many drivers and operators due to its lower fees, simpler application processes, and flexible requirements. Wolverhampton, for example, only requires 1 year of driving experience, does not require a knowledge test, and the costs for driver badges and vehicle plates are far more affordable than those in Cherwell. Moreover, Daventry Borough Council and South Northants Council offer comparable services but at much lower prices, making it evident that Cherwell's licensing fees are out of line with its neighbours. The rising costs in Cherwell, combined with the proposed policy changes, may encourage more drivers and operators to look outside the district for better conditions, which

could have long-term detrimental effects on the local taxi trade. 10. 3 Years Driver Experience Requirement – Comparison with Wolverhampton We also have concerns regarding the minimum 3-year driving experience requirement that Cherwell District Council have in place. This is significantly higher than what is required by other councils, such as Wolverhampton, which only mandates 1 year of driving experience for taxi and private hire drivers. The more stringent 3-year requirement in Cherwell could lead to a loss of drivers to neighbouring councils like Wolverhampton, where the entry requirements are less restrictive and the cost of operating a taxi is considerably lower. In Wolverhampton, drivers can enter the industry with just 1 year of driving experience, and the associated costs for driver badges and taxi plates are notably cheaper than those in Cherwell. Additionally, Wolverhampton does not require a knowledge test, which further eases the entry process for drivers. As a result, Cherwell risks losing a significant number of experienced drivers who may choose to relocate to Wolverhampton, where the process is more accessible and financially viable. This could result in a reduced pool of available drivers within Cherwell, affecting the overall supply and demand balance, potentially leading to longer wait times for passengers and reduced competition within the local market. We ask the Council to justify the need for a 3-year driving experience requirement when Wolverhampton has shown that a 1-year experience is sufficient to maintain high standards and ensure public safety. Furthermore, we would like to know what steps the Council plans to take to prevent the outflow of drivers to more flexible, competitive councils like Wolverhampton. It is crucial that any new policy implemented is not only feasible but fair to the people it affects—taxi operators, drivers, and local communities. The taxi trade plays a vital role in providing essential transport services, and Cherwell's local economy depends on a viable and sustainable industry. By imposing overly stringent regulations, high fees, and excessive vehicle requirements, the proposed policy may inadvertently harm the very people the Council seeks to protect, leading to greater unemployment, higher fares, and reduced service availability. We call on the Council to re-evaluate the proposed changes with a focus on ensuring that they are both realistic and balanced, particularly in light of the current challenges facing the taxi trade. Rather than adopting a one-size-fits-all approach, we urge the Council to work collaboratively with operators to find pragmatic solutions that can improve public safety while preserving the livelihoods of those who serve the local community. The local taxi industry is at a critical crossroads, and the Council has an opportunity to support and sustain it through a more thoughtful, flexible policy—one that allows the trade to thrive rather than diminish. We ask that you reconsider the most harmful elements of this proposal,

	<p>take our concerns seriously, and work with the community to build a policy that is fair, practical, and achievable for all stakeholders. We appreciate your time in considering this response and respectfully ask that the Council address the points we've raised in a manner that ensures fairness, practicality, and the continued viability of taxi and private hire businesses in Cherwell.</p>	
<p>Any further details to add to appendices A to I? - Reason:</p>	<p>I am writing on behalf of myself and several other license holders to formally oppose the proposed changes outlined in the Taxi Licensing Policy Consultation 2025. While we understand the need to update policies to meet legislative requirements and improve safety, we strongly believe that the current proposals are unrealistic, financially burdensome, and logistically unfeasible for many operators in Cherwell. The taxi trade in our area is already suffering, with many drivers forced to seek alternative employment in sectors such as food and parcel deliveries just to make ends meet. The introduction of the mandatory 6-month</p>	<p>Comment only makes direct reference to Council led mid-term licence inspections. We have moved the implementation date for the Council led inspections from the 1st January 2026 to the 1st April 2026, to allow for testing capacity and functionality assessments prior to implementation. The cost of these inspections will be below the Government published MOT cost.</p>

	vehicle inspections, significant fee increases, and stringent vehicle and driver requirements is placing additional financial strain on an industry already in decline. These new measures could push even more operators and drivers to leave the trade, exacerbating the issue of driver shortages and potentially leading to fewer options for local residents in need of transport. Many drivers a	
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Any further details to add to appendices A to I? - Reason:	Email	N/A
Any further details to add to appendices A to I? - Reason:	There is no downloadable version of the survey; we will follow up this online submission with an email.	N/A

<p>Any further details to add to appendices A to I? - Reason:</p>	<p>For the attention of all respected Councillors, members of the committee and Head of licensing. I am writing to express my concerns with the new Taxi license proposals based on the following grounds: Firstly the proposed changes ask us to go to the council approved test site. Thorpe Lane Depot is far from Bicester and Kidlington; it won't be able to cope with 2000 taxi and private hire vehicles. As drivers we have built up years of relationships with local garages and members of the public who own private garages, these changes would mean they lose out and feels wrong to unfairly monopolise on trade through back door legislation. Secondly there is an increasing number of drivers choosing to licence their vehicles in Wolverhampton, due to the restrictive policies being imposed already in comparison by Cherwell District Council. This raises safety and enforcement issues, with the council losing money and local taxpayers having to pay other councils whilst working in our district. The planned Penalty Points system is flawed and a waste of valuable resources are being poured into something that hasn't improved standards at all. Driving & Vehicle Agency point system is fair already gives a point system for drivers and adding another layer doesn't improve any standards. This has been evident since its introduction. It's a policy which might sound nice and something to keep people busy in the council offices but in practical terms there is no net benefit to the public since its inception. The DBS system won't cope with one CDC supplier. The current system addresses all concerns and ensures the public is safe. Adding another layer or further hindrances to a policy that's already working is pointless. We believe there should be a refresher course, not a repeat of the exam for safeguarding. If somebody has already passed all tests, a refresher is much better to address any future concerns rather than increasing anxiety amongst drivers who've already been trained and passed the exam. The Formal Vehicle Check Documentation reporting is impractical. The current system works well in terms of safety. CDC licensing department try their best but are already severely underfunded and overworked. It seems as though the heads believe increasing workload on an already stretched department will fix some imaginary issues which are not even here. The current vehicle checks are more than sufficient and there hasn't been any incidents whereby such a practice is needed. The plan for Cherwell District council to deliver training, and compliance checks won't work and is not possible with current levels of CDC Current Dbs process has issues what guarantees that moving to new system it will be more efficient and easier for drivers. Knowledge and Safeguarding should only apply on new applications, for renewals a refresher on Safeguarding workshop. Safeguarding workshop as a refresher rather than being a test The main point of contention is the Age limit to vehicles requirements are</p>	<p>We have moved the implimentation date for the Council led inspections from the 1st January 2026 to the 1st April 2026, to allow for testing capacity and functionality assessments prior to implementation. The actual number of licenced vehicles in Cherwell is around 1000, not 2000. Only the mid-term 6 month licence inspection is required to be done at the council depot, every 12 month MOT's can be done at a MOT garge of the drivers choosing. We can not control where drivers obtain licences from, however, those licenced by other Council's may only operate as the law allows in Cherwell. We see the penalty points system as a deterrent and alternative enforment tool, and extending the time points remain on licences will further deter non-compliances. The TaxiPlus platform has more than enough capacity for Cherwell DBS applications, it is cheaper for drivers than the paper based system we were using. It is also quicker and more convenient as drivers can also complete the DBS online, so no longer have to make an appointment to come to the Council to complete the paper DBS. The knowledge test already only applied to new driver applications, we believe for Safeguarding the full course every 3 years is necessary as this is a very important subject for licenced drivers. We have increased the age limit of all vehicles following the consultation. All allegations are properly investigated, the suggestion that any allegation against a driver will simply result in suspension is incorrect.</p>
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	<p>outdated. They are far too restrictive and cause many of the drivers to look elsewhere for their licensing. It is anti competitive. A cost of a car under 5 years old is expensive enough and with only a ten year period to cover those expenses it's already proving very difficult for most drivers to continue. Electric vehicles are not viable at all even the 2030 target not feasible The new policy would require that newpolicy 6 month inspections by the licensing authority rather than just a mot test. This is impractical. We still have major issues in relations drivers being penalised without thorough investigation. As it currently stands the drivers are not protected against any false accusations. It means if somebody disputes a fair and chooses not to pay- they can simply allege foul play by a driver and the driver is immediately suspended. There is no update information on how to appeal or how it is progressing. Driver is presumed guilty without being proven guilty. This results in a loss of income and the danger of persecution of character without any basis. Current target not feasible for electric or hydrogen vehicles; nothing on the market. No suitable vehicles for saloon cars that give adequate range and are very costly the used EV market is unknown. plus driving condition always changing ie weather and roads. No ;suitable WAVs at all in the current market that are cost or milage appropriate also no current facilities at the rank. The current age incentives should not be exclusively for just electric, hybrid or hydrogen. It should be for all types of private hire and Hackney carriages as not easy to acquire even in current climate and most vehicles are kept in immaculate condition mechanically and body wise. We do not agree with the wheelchair accessible changes due to the fact WAVs are being favoured over saloon cars Even when there's not enough requirements for them and they bring incentivised; please advise why? Do you agree with the policy approach to accessibility and inclusion? (Appendices A to D). (Required) No I don't agree with any! I also feel that our needs are always neglected and the council every year increase fees and the service and standards are dropping. We are one of few councils in the uk that did not get any support from the council in Covid. As a whole private hire and Hackney carriage make up of around 2000 drivers based on the £237.85 renewal fee of 3 years we contribute and pay the council around £475'000 divided by 3 is £158'333.33 1000 private hire renewals @ £306.80 = £306'800 200 HCV @ £317.50 = £63'500 So the drivers of Cherwell district council pump around £530'000 minimum into the council & Not only are these figures under inflated but we feel that we are mis treated and walked over especially how much money we push into the local economy. CDC Driver: Ansar Aslam Date:11/08/25</p>	
Any further details to add to	There is no downloadable version of the survey; we will follow up this online submission with an email.	N/A

appendices A to I? - Reason:		
Any further details to add to appendices A to I? - Reason:	<p>For the attention of Councillors, Licensing Committee, and Head of Licensing I strongly object to the proposed changes to Cherwell District Council's taxi licensing policy. These changes will damage drivers, harm small businesses, and reduce transport choice for the public. 1. Depot-Only Vehicle Testing Centralising six-month checks at Thorpe Lane Depot will create backlogs, take vehicles off the road, and strip work from trusted local garages across Banbury, Bicester, Kidlington, and surrounding areas. This is anti-competitive and will not improve safety compared to the current MOT system. 2. Unrealistic Vehicle Age Limits Strict age caps will push many drivers out of the trade or to licence elsewhere (e.g., Wolverhampton). Electric and hydrogen vehicles are not viable for most drivers due to cost, range, lack of charging points, and no affordable WAV options. Condition-based checks are fairer and in line with DfT guidance. 3. WAV Targets Without Evidence Increasing WAV numbers without proven demand will shrink the saloon fleet and raise passenger costs, with no guaranteed improvement in accessibility. 4. Penalty Points Overreach Extending point retention from 1 to 3 years (5 for operators) punishes the majority for the actions of a tiny minority. The DVLA already has a fair national points system. 5. DBS & Safeguarding The current DBS system works. For renewals, safeguarding refreshers should replace re-tests. Knowledge tests should apply only to new applicants. 6. Economic Damage to Cherwell Drivers contribute over £500k in licence fees to CDC each year. These proposals will cause downtime, higher costs, and fewer vehicles in service. Public transport gaps will widen, hitting shift workers, rural passengers, and vulnerable residents. In Summary DfT guidance requires policies to be proportionate and avoid unnecessary burdens. These proposals fail that test. Keep MOT flexibility, set realistic vehicle age policies, make WAV targets evidence-led, keep enforcement fair, and protect local business.</p>	<p>1: We have moved the implementation date for the Council led inspections from the 1st January 2026 to the 1st April 2026, to allow for testing capacity and functionality assessments prior to implementation. The Council led inspections will be taxi based to ensure compliance with taxi licensing requirements and general vehicle condition. 2: The age limit for all vehicles has been increased post consultation. 3: WAV numbers for Operators have been reduced following the consultation, we have also made it clear WAV Hackney vehicles can be included by Operators. 4: The change in penalty point duration on Taxi licences is in line with DfT guidance, the majority of drivers licenced with Cherwell DC don't have or have never had penalty points applied. We do not see how this change will affect any compliant drivers. 5: TaxiPlus is cheaper for drivers than the paper based system the Council was using. It is also quicker and more convenient as drivers can also complete the DBS online, so no longer have to make an appointment to come to the Council to complete the paper DBS. The knowledge test already only applied to new driver applications, we believe for Safeguarding the full course every 3 years is necessary as this is a very important subject for licenced drivers.</p>
Any further details to add to appendices A to I? - Reason:	There is no downloadable version of the survey; we will follow up this online submission with an email.	N/A
Any further details to add to appendices A to I? - Reason:	Across Appendices A to I, several proposals exceed DfT guidance and create unnecessary costs without clear public benefit. Depot-only testing will cause downtime and harm local garages. WAV targets must be evidence-led. Vehicle age policy should be condition-based. Enforcement must include a fair, timely appeals process. An economic impact assessment is essential before implementing changes that risk reducing fleet numbers or driver viability	Council only testing is only for mid-term 6 month license inspection, 12 month MOT's can be conducted at any MOT garage the driver chooses. We have moved the implementation date for the Council led inspections from the 1st January 2026 to the 1st April 2026, to allow for testing capacity and

		functionality assessments prior to implementation. WAV targets for Operators have been amended, reduced, following the consultation. All vehicle age limits have been increased.
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