
Licensing & Regulatory Committee
Cabinet Member City Services

18th November 2025
8th December 2025

Name of Cabinet Member:

Cabinet Member for City Service - Councillor P Hetherton

Director Approving Submission of the report:

Director of Law and Governance

Ward(s) affected:

All

Title:

Review of the current Statement of Licensing Policy (Taxi & Private Hire) to include changes on Emissions, Age of Vehicles and Best Practice Guidance.

Is this a key decision?

No

Although the matters within the report affect all wards in the city, it is not anticipated that the impact will be significant.

Executive Summary:

The purpose of this report is to update Members of the outcome of the eight-week consultation undertaken on the review of the current Statement of Licensing Policy (Taxi & Private Hire) to include changes on Emissions, Age of Vehicles and Best Practice Guidance and to recommend for approval, a revised policy.

Recommendations:

Licensing & Regulatory Committee is recommended to:

1. Consider the results of the consultation, and the proposed changes on the revised Statement of Licensing Policy (Taxi & Private Hire) and notify the Cabinet Member for City Services of its comments.

Cabinet Member for City Services is recommended to:

1. Consider the results of the consultation, and the proposed revised Statement of Licensing Policy (Taxi & Private Hire) and any comments from the Licensing & Regulatory Committee.
2. Approve and adopt the revised Statement of Licensing Policy (Taxi & Private Hire) attached as Appendix A of the report.

List of Appendices included:

Appendix 1 – revised Statement of Licensing Policy (Taxi & Private Hire) (shaded paragraphs illustrate the amendments to the document).

Appendix 2 – Summary of consultation responses

Appendix 3 – Representation - The Guide Dogs for The Blind

Appendix 4 – Equalities Impact Assessment

Other useful background papers:

DfT Taxi and Private Hire Vehicle Licensing Best Practice Guidance for Licensing Authorities in England (November 2023).

Has it been or will it be considered by Scrutiny?

No

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

Yes

Licensing & Regulatory Committee – 5th August 2025 & 18th November 2025

Will this report go to Council?

No

Report title: Licensing Act 2003 – Revised Statement of Licensing Policy

1. Context (or background)

- 1.1** The current Statement of Licensing Policy (Taxi & Private Hire) commenced on the 14th September 2022. The policy is reviewed every 5 years unless a review is required due to legislative changes or emerging issues.
- 1.2** The purpose of the policy is to set out the terms and conditions that will apply to new applicants and those already licensed for the Hackney Carriage & Private Hire trade.
- 1.3** Coventry City Council (The Council) has a duty under the Town Police Clauses Act 1847 and the Local Government (Miscellaneous Provisions) Act 1976 to carry out its functions as the Licensing Authority.
- 1.4** The Council has a duty under these acts to carry out the following functions:
- Ensure that drivers are ‘fit & proper’.
 - Ensure that all licensed vehicles are road worthy and fit for the carriage of fare paying passengers; and
 - Protect public safety.

The promotion of these functions is of paramount consideration when determining an application and any conditions attached to an authorisation.

- 1.5** The DfT has national responsibility for Hackney Carriage & Private Hire legislation in England & Wales. The DfT has issued best practice guidance on taxi & private hire vehicle licensing since 2006 to assist local authorities that have responsibility for the regulation of taxi & private hire vehicle trades. This is updated periodically, considering stakeholder views and the way in which the sector operates. The DfT has published non-statutory best practice guidance to complement the statutory standards in 2010 and revised and re-issued this in November 2023, covering a range of issues outside of the remit of the statutory standards.
- 1.6** The focus of the best practice guidance is to ensure that taxi & private hire trade provides a safe, inclusive, accessible and attractive service for the passengers they carry. Whilst the safety of the public is paramount, licensing authorities, as regulators, also have a duty to ensure that they carry out their activities in a way that supports the people and businesses that they regulate. The best practice guidance aligns with overarching principles in the Regulators Code that unnecessary burdens should be avoided and that regulators should approve proportionate approaches.
- 1.7** This policy must be renewed every five years, but an earlier review may be triggered by new legislation, regulatory changes, or emerging issues subject to a full consultation process. As such, relevant sections of this policy are under review to reflect local issues.
- 1.8** Cabinet Member for City Services on 25th July 2025 and Licensing & Regulatory Committee on 5th August 2025, considered a report on the draft revised Statement of

Licensing Policy and authorised the Director of Law & Governance to consult on its contents.

- 1.9** This report advises Members of the consultation that has taken place and outlines the comments received and amendments made to the Council's draft licensing policy.
- 1.10** Following public consultation, the revised draft Statement of Licensing Policy is now ready to be recommended for adoption to take effect from 1st January 2026 (Appendix A).

Key Changes to the Revised Licensing Policy

- 1.11** The proposed changes include:
- Paragraph 5.9 - To bring the current emissions policy in line with the other West Midlands Councils so that as of the 1st of January 2030 new and replacement vehicles are required to be either an Ultra-Low Emission vehicle (a vehicle that will produce less than 75g CO2/km), produce zero emissions or be zero emission capable by this date.
 - Paragraph 5.8 - Remove the age limit to reflect the Department for Transport guidance.
 - Paragraph 5.2 - Remove the London Conditions of Fitness to enable a greater choice of vehicles to be licensed as hackney carriage vehicles. These vehicles would be required to be wheelchair accessible (either factory made or modified in accordance with the DVSA and industry standards). There will no longer be a prescribed list of approved vehicles, but rather each vehicle will be assessed at the point of application to determine its suitability in accordance with the policy, and in line with industry standards in relation to wheelchair accessibility.
 - Paragraph 4.12.3 - All drivers must register with the Disclosure and Barring Service (DBS) by subscribing to the DBS Update Service enabling the licensing authority to check the driver's DBS status at any time (a minimum of 6 monthly intervals).
 - Paragraph 4.18.1 - When a certificate of good conduct is provided and not in English a notarised translation would need to be provided by the applicant at their own expense.

2 Options considered and recommended proposal.

- 2.1** The Licensing & Regulatory Committee is recommended to:

Consider the results of the consultation on the revised Statement of Licensing Policy for the period 2026 – 2031 and notify the Cabinet Member for City Services of its comments (Appendix B).

2.2 The Cabinet Member for City Services is recommended to:

1. Consider the results of the consultation of the revised Statement of Licensing Policy and any comments from the Licensing & Regulatory Committee.
2. Approve and adopt the proposed changes to Statement of Licensing Policy for the period 2026 – 2031.

3 Results of consultation undertaken

3.1 The public consultation ended on 3rd October 2025, and the following were consulted:

- All Taxi & Private Hire licence holders
- Hackney Carriage trade
- Unite Trade Union representing the trade
- Private Hire Operators
- Formally writing to the Chief Officers of the responsible authorities, including the Chief Officer of Police
- Neighbouring local authorities
- Relevant internal departments
- Disabled groups (DEAP)
- Wider public consultation through the City Council Website.

3.2 There were 119 responses to the consultation (117 online consultation responses, one response received by e-mail and a separate representation). The consultees were from the licensed trade, members of the public, disability groups and businesses. The comments are summarised in Appendix 2.

3.3 A separate representation was made by The Guide Dogs for the Blind which is attached as Appendix 3. Whilst this was a direct response to the consultation the issues raised are not relevant to this policy review but will be considered for future reviews to the policy.

3.4 Most of the responses supported the proposed changes.

3.5 Of the responses the comments can be summarised as follows:

3.5.1 Amendment to emissions policy

The majority of consultees supported the policy, noting that providing there is a sufficient transitional period, licensees will benefit from the change, as they will have flexibility to choose from a number of suitable vehicles commensurate to their financial position.

Some consultees indicated that the extension to the emissions policy to 2030 does not provide adequate transition time to allow for purchasing new vehicles. However, should the policy not be amended the implication is that the existing emissions policy would have to come into effect on 1st January 2026. Therefore, the amended policy

allows significant additional time for licence holders to comply.

In addition, some consultees were aggrieved by the proposed revision on the basis that they had already purchased an electric vehicle. We acknowledge their position but consider the proposed revision necessary to place Coventry in line with neighbouring authorities. We acknowledge the challenges faced within the last few years regarding cross border hiring and hope that the revision will work to reduce this and level the playing field for Coventry licencees.

Some consultees commented that no revision should be made in order to promote clean air within the city. Whilst we acknowledge the concern, this would have an adverse effect on the current fleet, in terms of the number of wheelchair accessible vehicles that comply with the current policy. Furthermore, the proposed changes have been made in collaboration with the climate change team.

Recommendation: Adopt proposed revision of the policy.

3.5.2 Removal of vehicle age limit

The majority of consultees supported the proposed change to remove the age limit. The comments included supporting an emissions policy, keeping vehicles in good condition and passing MOT's and to be consistent with other local authorities. Some consultees agreed with The Department for Transport guidance which advises against the imposition of rigid age limits on licensed vehicles, suggesting instead that vehicle eligibility be based on targeted outcomes such as emissions, safety standards and accessibility.

Those consultees who were unsupportive of the proposed change were concerned that removal of the age limit would encourage drivers to run the vehicles for longer and risk poorer quality vehicles to be on the road. We consider compliance with the revised emissions policy and regular MOT inspections would alleviate this concern.

Recommendation: Adopt proposed revision of the policy.

3.5.3 Removal of the London Conditions of Fitness.

The overwhelming majority of consultees support this change noting that it will provide more affordable vehicles for current and prospective licence holders. Those in support welcome the revision to encourage the availability of other vehicles, noting the importance of wheelchair accessibility standards.

Of those that were unsupportive the concern was around a decline in standards and a potential decline in the availability of wheelchair accessible vehicles (WAV's). To ensure that the fleet are able to respond to the demand for WAVs, the licensing authority will only licence those vehicles that are either manufactured or modified to be wheelchair accessible. These vehicles will need to demonstrate compliance by the licensing authority prior to granting a licence. There will not be a prescribed list of approved vehicles, but rather each vehicle will be assessed at the point of application to determine it's suitability in accordance with the policy, and in line with industry standards in relation to wheelchair accessibility.

Recommendation: Adopt proposed revision of the policy.

3.4.4 Subscription to the DBS update service

There is an overwhelming majority supporting this proposed change noting that this is a more efficient way of working and it promotes public safety.

An unsupportive consultee suggests the checks should be annual; however, we do not see the benefit of this as the Council has a duty under the Town Police Clauses Act 1847 and the Local Government (Miscellaneous Provisions) Act 1976 to carry out its functions as the Licensing Authority to protect the public, and six monthly DBS checks provide this reassurance.

Recommendation: Adopt proposed revision of the policy.

3.4.5 Certificate of good conduct.

There was an overwhelming majority supporting this proposed change, noting that it would promote public safety and allow for more rigorous checks on the driver.

Unsupportive consultees expressed concern about the cost to the driver and accuracy of translation. However, the requirement for a notarised translation will provide reassurance in this regard. Further for the Council to meet this cost implication it would require a full fee review, which is disproportionate considering the small, anticipated number of prospective applications requiring translated documents.

Recommendation: Adopt proposed revision of the policy.

4 Timetable for implementing this decision.

- 4.1** The revised Statement of Licensing Policy must be published by 1st January 2026 allowing the Council to continue to carry out any function in respect of individual applications.

5 Comments from Director of Finance and Director of Law & Governance.

5.1 Financial implications

The financial implications associated with the recommendation are limited to the employee costs associated with undertaking the consultation exercise and any costs involved in publishing the Statement of Licensing Policy, which are funded within existing budgets.

Legal implications

The licensing function is carried out by the Council's Licensing and Regulatory Committee and officers exercising delegated powers. The one exception is the approval of the Policy, which must be approved by Full Council.

The Council is required to have regard to any DfT best practice guidance when carrying out any licensing functions including its Statement of Licensing Policy

6 Other implications

6.1 How will this contribute to achievement of the One Coventry Plan?

<https://www.coventry.gov.uk/strategies-plans-policies/one-coventry-plan>

The Policy aligns with the One Coventry Plan to work together to improve our city and the lives of those who live, work and study here. The changes to the policy will encourage a more flexible approach to licensing which will encourage the trade to licence with Coventry, increasing the economic prosperity of the City and region.

The changes to the policy will encourage a more inclusive fleet, which aligns with the objective of tackling inequalities within communities.

The policy aligns with the One Coventry Plan as the Council is acting as partner with neighbouring authorities by harmonising our policies with those in the region, encouraging a level playing field for those within the hackney carriage and private hire trade.

6.2 How is risk being managed?

The Statement of Licensing Policy will inform decisions taken by the licensing authority that will have an impact on the interests of private individuals and businesses. The Policy reflects the need to respect the relevant rights given by the Human Rights Act.

Decisions of the Licensing Authority are open to challenges through the Magistrates Court and beyond. The Statement of Licensing Policy is designed to ensure our compliance with legislation and best practice guidance, minimising the risk of legal challenge.

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6.3 What is the impact on the organisation?

The adoption of the policy should have no impact on the organisation. There are no human resources, financial or ICT implications.

6.4 Equalities / EIA

The Statement of Licensing Policy makes links to the Council's Equality and Diversity Policies and an Equalities Impact Assessment exists for licensing activities. This has been reviewed and updated as part of the consultation process (Appendix 3).

6.5 Implications for (or impact on) climate change and the environment

The Policy has been reviewed in collaboration with the Climate Change team, and it contributes to the Council's aim for Coventry to be carbon neutral by 2050, with an interim target of a 68% reduction in emissions by 2030.

6.6 Implications for partner organisations?

The Statement of Licensing Policy contributes towards the work with partner agencies

specifically with the work of the police and safeguarding children.

The effective operation of the policy by the Licensing Authority and all enforcement agencies has an impact on the public safety of residents and communities.

6.7 Human Rights Act Implications

None

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