

Appendix B

Responses to Coventry City Council Statement of Licensing Policy Consultation

8th August 2025 – 3rd October 2025

1. Background

- 1.1 The public consultation on the draft Statement of Licensing Policy took place for 8 weeks from 8th August 2025 – 3rd October 2025.
- 1.2 The consultation was extensive and included a range of licensed trade, stakeholders and the general public..
- 1.3 There were 119 responses received during the consultation period (117 through the online portal, one by e-mail and a separate representation). The breakdown of respondents is as follows:
 - Licensed Trade - 80 (67.2%)
 - Licensee with other authority - 1 (0.8%)
 - Disability Group - 2 (1.7%)
 - Member of the public - 32 (26.9%)
 - Business / Business association - 4 (3.4%)
- 1.4 All consultees were asked for comments on the draft policy, which have been organised into themes and are presented below.

1. It is proposed to change the current emissions policy in line with the other West Midlands Councils so that as of the 1st 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.

Are you supportive of this measure YES or NO

- **Yes – 67**
- **No – 45**
- **No opinion – 7**

Respondent	Feedback/Comments/Amendments
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Under the current economic condition, totally no, we have abundance of Wolverhampton plated vehicles operating within our city with empurity and free will
As a Coventry City Council Licensed Vehicle Proprietor, As a Coventry City Council Licensed Operator, A driver, proprietor or operator licensed with another licensing authority	The new vehicles being offered are just not affordable to comply with this.
As a Coventry City Council Licensed Driver	Electric Taxis are too expensive and Uber has taken alot of the trade.

	If vehicle is maintained to a good standard and it passes the emissions test during inspection, it should be allowed to carry on
As a Coventry City Council Licensed Driver	Because of gray areas in law already drivers suffering from changing who went on hybrid cars and still city council allowing 20to fifteen years cars ...city council s monopoly law destroy black cab drivers.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Due to previous emissions policy and vehicle age policy, as an abiding licensed proprietor I made the financial commitment to purchase a new LEVC taxi. This was a huge undertaking for me and during COVID time it was very difficult. Moving the goal post on the emissions policy is grossly negligent and irresponsible to proprietors like myself
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	2030 is an ambitious target unfortunately councils and the wider government have always been over confident in there emissions targets and zero emission zones we clearly do not have enough zero emission vehicles on the road and they are costly to purchase.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	As you know there is lot competition in taxi trade, since uber and bolt operating in Coventry our taxi trade has significantly decreased so we can't afford to buy new vehicles at the moment thx.
As a Coventry City Council Licensed Driver	Despite living costs contineously going up including council tax, other bills such as electricity, gas water, and food costs that has negatively impacted the population of this city, this extra cost of new or replacement of vehicle will put everyone and my family below any poverty imagenable. As you aware in our profession (taxi) no one can earn enough to live on and this has put many people on state benefit. The council must have this in mind that the main concern for it is the competition that other large company outside of the city such as Uber that has put our job at risk of complete collapse.

	The last thing that poor working people of this city need is for it's own council to purposely bring in a policy that make every family poorer and the children to suffer even more.
As a Coventry City Council Licensed Vehicle Proprietor	As I purchased a levv electric vehicle i am disgusted that the council keep on changing the policy year after year I know times are tight but vehicle are getting older and older and the owners won't replace them if there being given a reprieve year after year
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Operator	It's practically impossible to cover airport transfers in low emission vehicle's due to size and mileage capacity.
As a Coventry City Council Licensed Driver	As a hackney driver in Coventry our trade in the city has been significantly impacted by the border crossing of other council licenced vehicles working in the city. It has to be extended beyond 2030 as theirs not enough trade for drivers to buy these new levv for working in the city.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	It is grossly negligent to change the goal post on this, against proprietors who have made financial commitment based on current policy.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	The taxi trade has changed due to online companies and its not viable to purshase a ultra low emmision taxi or eletric taxi .
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Should be sooner
As a Coventry City Council Licensed Driver	In order to meet the emmision one need to buy a new car, only allowed to use one brand which a low income driver like me can not think about let afford , other vehicle options should be available like other councils offer
	Yes I completely support this change to the emissions law

	Because there is no chance of affording a LEVC electric vehicle not enough work because of UBER and other taxi services operating in Coventry. If we could get a few more years beyond 2030 would also help.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Only vehicles over 15 yrs should b removed
As a Coventry City Council Licensed Driver	Far too many Uber in Coventry has taken black cab jobs. Black cab must stay. Stop cross border hiring.
As a Coventry City Council Licensed Driver	You have only given us a one option which is Levic Taxis not any others makes so it's very difficult to run the taxi which is very expensive and on the other side is Uber so at least give us more options like other councils so we can pick and choose more reliable vehicles.
As a Coventry City Council Licensed Driver	Under current circumstances of work no driver can afford any new vehicles
As a Coventry City Council Licensed Driver	No thanks.
As a Coventry City Council Licensed Driver	Our earning margin is low compared to other# uber drivers and also paperwork fees are higher.
As a Coventry City Council Licensed Driver	The deadline is unrealistic
As a Coventry City Council Licensed Driver	As a Hackney carriage driver a replacement vehicle will cost £70000 which not affordable in the current climate
As a Member of the public	Usd exactly the same rules as Wolverhampton
As a Member of the public	2030 is too soon to introduce this policy. The infrastructure for EV cars will not be in place in sufficient numbers to support the amount of vehicles in the city.
As a Member of the public	There are still so many older taxis in use which are clearly highly polluting, this is a major step forward.

As a Member of the public	Why do you have to wait until 2030? There are very old taxis polluting Coventry.
As a Member of the public	Unlikely to have enough national power generation for the drive to change to all electric for this to be viable.
As a Member of the public	Can we ensure this applies to uber driver also why we got Uber driver from Wolverhampton operating in coventry
As a member of a Business, Business Association or Manufacturers	Whilst supportive of this change an impact assesment should be carried out on the current fleet and what support is offered to local firms to support with the transition to a greener fleet.
As a Member of the public	I think it's important to have a phase out period for current older vehicles
As a Member of the public	Fully support this move. In my opinion, many of the older taxis look incapable of meeting modern emission requirements.
	LEVC supports revisions to emissions policies that are aimed at accelerating the uptake of zero emission capable (ZEC) vehicles and support the Council's clean air ambitions. Coventry originally introduced a ZEC requirement for new taxis in 2019, to apply to new vehicles from 1st January 2024. We consider this a sufficient amount of time for drivers to prepare for the transition and to plan their investment in a new vehicle. Coventry should not further delay the enforcement of stricter emissions criteria for taxi drivers to ensure the local population is able to benefit from cleaner air as soon as possible. Road traffic is often the largest contributor to local CO2 and NOX emissions, and a single non-ZEC taxi or PHV can produce multiple times more pollution than a private passenger car due to the time spent on the road. Accelerating the switch to ZEC taxis with a mixture of 'carrot and stick' policies will have a more significant impact on local air quality and deliver greater environmental benefits in urban areas than private vehicles.
As a member of a Business, Business Association or Manufacturers	<u>Euro Standards to 2030</u> . We support the Council's recommendation in 5.9.1 that from 1st January 2030 any replacement vehicles and any new vehicles are required to be ultra-low emission, zero emission or zero emission capable.

	However, in the interim, (1st Jan 2026- 31st Dec 2029) the proposal indicates that the Council will continue to licence older Euro 4 or Euro 5 taxis which significantly contribute to poor local air quality. The government's recommendation is to move over to Euro 6 as the minimum standard for taxis. Many local authorities, and not only those in Clean Air Zones, have already done so, or set earlier time limits. <u>Defining zero emission capable.</u> In addition to CO2 rates the Council should also consider the minimum zero emission mileage range for hybrid vehicles, (e.g. 20, or 30 miles). For example a more defined policy for zero emission capable might be that a wheelchair accessible taxi should have CO2 emissions of 75gm/km or less, measured according to the WLTP and be capable of being operated at zero emissions for 30 miles or more.
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2. It is proposed that the policy be amended to reflect the DfT guidance and that the age limit of vehicles be removed.

Are you supportive of this measure YES or NO

- **Yes 69**
- **No 39**
- **No opinion 11**

Respondent	Feedback/Comments/Amendments
As a Coventry City Council Licensed Driver	In the current economic climate, Age limit should be removed
As a Coventry City Council Licensed Driver	Stop two yearly MOT,s ..as if major faults driver have to fix it to b on road .second MOT is just money making machine for tlo.

As a Coventry City Council Licensed Driver	Providing it passes existing emissions controls
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Again grossly negligent to proprietors made financial commitment on previous policy.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	It is quite clear to everyone in the trade and out of the trade that if you take out older taxis as intended you will only have a handful of taxis on the road which is no where near enough to cover demand.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Age limit should not be removed
As a Coventry City Council Licensed Driver	If vehicle has passed mot and fit to be on the road then no age limit should apply
As a Coventry City Council Licensed Vehicle Proprietor	As the work is really quite we need time to get opinions
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Operator	In the current format it's practically impossible to license newer vehicles and be competitive against the likes of UBER.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Having a taxi myself we have 2 mot a year and keep the cab in top condition.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Remove the old sheds on the road
As a Coventry City Council Licensed Driver	There should not be an age limit

As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	15 yrs or less
As a Coventry City Council Licensed Driver	Wolverhampton council issued far too many private hire licence they work in Coventry as an Uber driver. No need to stop age restrictions vehicle . If implemented there will be no Black cab in Coventry for disabled and night out customers.
As a Coventry City Council Licensed Driver	Age restrictions should be removed because other councils in surrounding not have any age restriction like Solihull Birmingham Nanton Bedworth.
As a Member of the public	Age limit should remain
As a Member of the public	Need to keep the taxis in good condition and high quality
As a Member of the public	Use the same rules as Wolverhampton
As a Member of the public	As long as it is in excellent condition
As a Member of the public	Not enough information in the statement to give an answer.
As a Member of the public	Only the new least polluting car should be used
As a Member of the public	Really old vehicles need to be removed.
As a Member of the public	This combined with the rules around emissions could encourage drivers to run vehicles for far longer increasing risk of failures, poor emissions etc. given the mileage covered and wear and tear from roads cars carrying fee paying public should have a maximum age limit in my opinion.
As a Member of the public	No need to scrap a vehicle that can still pass safety and emission requirements.
As a member of a Business, Business Association or Manufacturers	The Department for Transport 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. LEVC agrees with this approach; vehicle age is a less important measure when deciding on licensing

	requirements than meeting the transport needs of the local population and meeting clean air ambitions. It is our view that arbitrary age limits could prevent low-emission and zero-emission capable vehicles being sold in favour of higher-emitting, newer vehicles. As more ZEC taxis enter the second-hand market, these vehicles offer a more affordable option to many drivers.
As a Member of the public	I support the Age of Vehicles revision, provided all vehicles meet the updated Emissions policy (as of the 1st January 2030 new and replacement vehicles are required to be either an Ultra-Low Emission vehicle, produce zero emissions or be zero emission capable by this date).

3. It is proposed to remove the London Conditions of Fitness to enable a number of other vehicles licensed as hackney carriage vehicles. These vehicles would be required to be wheelchair accessible (either factory made or modified in accordance with the DVSA).

Are you supportive of this measure YES or NO

- **Yes 93**
- **No 15**
- **No opinion 11**

Respondent	Feedback/Comments/Amendments
As a Coventry City Council Licensed Vehicle Proprietor, As a Coventry City Council Licensed Operator, A driver, proprietor or operator licensed with another licensing authority	More affordable vehicles may interest drivers to upgrade their current Taxi

As a Coventry City Council Licensed Driver	For too long Coventry City Council had held drivers back by having these conditions, we the drivers should be allowed to have any vehicle as long as it's wheelchair accessible.
As a Coventry City Council Licensed Driver	I'd only support that if Uber was restricted from working in Coventry.
As a Coventry City Council Licensed Driver	This should have been done 20 years ago. We should follow middle cities and towns.
As a Coventry City Council Licensed Driver	The trade has been strangled with the TfL guidelines
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	There are many vehicles that are suitable to be licensed and have been able to be licensed for many years. Councils' stubborn attitude has led to the situation we are in now.
As a Coventry City Council Licensed Vehicle Proprietor	That would enable the driver to upgrade their vehicle as the trade have lost confidence with levcs and the tax isn't suitable for some wheelchairs
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Operator	Current vehicles are too expensive to operate.
As a Coventry City Council Licensed Operator	WE NEED MORE WHEELCHAIR ACCESSIBLE OPTIONS
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	It is grossly negligent to change the goal post on this, against proprietors who have made financial commitment based on current policy.
As a Coventry City Council Licensed Driver	no wheelchair vehicles
As a Coventry City Council Licensed Driver	It's a good idea to have other vehicles in place.
As a Coventry City Council Licensed Driver	This should have happened many years ago
As a Member of the public	Need more wheelchair and disability friendly vehicles

As a Member of the public	Use the same rules as Wolverhampton
As a Member of the public	More support for wheel chair users is always welcome.
As a Member of the public	I am puzzled why London are not making similar changes.
As a member of a Business, Business Association or Manufacturers	The Conditions of Fitness represent the gold standard in taxi licensing and should be retained as essential to guaranteeing accessibility, safety and consistency in Coventry; abandoning them would represent a dilution of standards and risks the long term reputation and retention of the taxi sector in Coventry without addressing the root cause of affordability concerns (driver earnings and cross border hiring). LEVC developed the TX taxi to meet the exacting Conditions of Fitness, resulting in a purpose built vehicle with inbuilt features including fixed partitions, CCTV compatibility and high visibility that are impossible to retrospectively incorporate into a converted vehicle without major cost. The Conditions of Fitness guarantee universal access for disabled passengers, ensuring the Council is meeting its obligation to wheelchair users. There is evidence of decline in availability of wheelchair accessible vehicles in areas where Conditions of Fitness have been dropped, for example in North Yorkshire which has seen a corresponding rise in private hire license applications. We are very concerned that removal of the Conditions of Fitness would result in further degradation of the Coventry fleet, with drivers choosing the cheapest option without sufficient consideration of the impact on passengers. Disabled passengers and people unable to access other forms of public transport rely on taxis for essential appointments and reducing their availability would represent a real-world decline in the Council's ability to meet transport needs, leading to hardship for some of the most vulnerable local residents. Coventry is already underserved by wheelchair accessible vehicles due to issues relating to enforcement and cross border hiring. To remove the CoF would fatally damage the future of the taxi trade here on our doorstep and with a growing number of high-quality, lower priced used taxis that meet CoF now entering the market, would undermine the future sustainability of wheelchair accessible vehicles in Coventry.

As a member of a Business, Business Association or Manufacturers	We welcome that Coventry Council is considering the removal the 8.54m turning circle requirement of the London Conditions of Fitness. Coventry now joins all other major UK cities outside London to remove this mandatory requirement and opens the opportunity for other alternative wheelchair accessible taxis to enter the market. Vehicle list The Council may wish to review the list of approved taxis. Some included are generic donor vehicles and not taxis (e.g. Citroen Dispatch, Ford Tourneo Custom or Fiat Scudo). These are likely to have been converted by several different converters over the years, only some of whom are likely to have been granted an ECWVTA or a GBTA for their conversions. Indeed some, might have only been granted "small series" or "Individual" approvals - or even no approval at all, in some of the worst cases). In addition, some of the specific taxis mentioned on the list, have not been manufactured for 15-20 years (e.g. SVA, TX1 or TW200) and will be of Euro 4 or, at best, Euro 5 standard.
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- 4 **It is proposed that there is an expectation that all drivers 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).**

Are you supportive of this measure YES or NO

- **Yes 93**
- **No 19**
- **No opinion 7**

Respondent	Feedback/Comments/Amendments
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Anything that keeps everyone safe is good
As a Coventry City Council Licensed Driver	It is easier monitoring and reduces the hassle.
As a Coventry City Council Licensed Driver	Should be one yearly.
As a Member of the public	Good idea
As a Member of the public	Use the same rules as Wolverhampton
As a Member of the public	I'm surprised that this is not the case already. Photo ID should also be displayed inside the vehicle and random council stop checks enforced.
As a Member of the public	Will this also apply to Uber drivers?
As a Member of the public	This should apply to those who Trent under a alias and uber drivers
As a Member of the public	Sounds a good way to reduce paper work, time and cost whilst maintaining public safety
As a Member of the public	This is important as vulnerable people utilise the taxi service often. Including women on evenings out.
As a member of a Business, Business Association or Manufacture	This expectation supports passenger safety and ability of the licensing authority to spot-check licenses whilst saving drivers money.

5 It is proposed that the policy will be amended to include that 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.

Are you supportive of this measure YES or NO

- Yes 88
- No 17
- No opinion 14

Respondent	Feedback/Comments/Amendments
As a Coventry City Council Licensed Vehicle Proprietor, As a Coventry City Council Licensed Operator, A driver, proprietor or operator licensed with another licensing authority	More checks are always a good thing considering the reputation that taxi drivers have and how the public feel about us
As a Coventry City Council Licensed Driver	When people enter UK they have to provide all relevant documents.councils are not above home office so please stay away from Wolverhampton model.it causes lots of stress and undue pressure...person living in England for 20 years with clean records all of sudden asked to produce paperwork from third world countries is unfair and totally disgrace.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	Good idea implementing it will be tricky if applicant is meant to provide translation, the council should be the one who has it translated independently
As a Coventry City Council Licensed Vehicle Proprietor	Why should we have to foot the bill when it the person is after a job
As a Coventry City Council Licensed Driver	It is vital and required for the safety and security of the community. In addition it makes the driver responsible and accountable for the job what he/she has taken among the society.
As a Coventry City Council Licensed Driver, As a Coventry City Council Licensed Vehicle Proprietor	I disagree because there is a lot of carupution in a lot of countries and these certicates are easy to get hold off
As a Coventry City Council Licensed Driver	The council should pay for this
As a Coventry City Council Licensed Driver	How can you sure it's right.
As a Member of the public	Makes sense

As a Member of the public	Use the same rules as Wolverhampton
As a Member of the public	Everything should be also checked that it is not forged
As a Member of the public	Again how is this not policy already! An application for any UK licence etc should be supported by documents written in English.
As a Member of the public	Who would police the translation service such that any record could not be 'cleaned up'. The origin of the certificate of good conduct should be required to provide an English version.
As a Member of the public	All drivers should have a level qualification who from abroad can drive and pass a uk test not international
As a Member of the public	As long as council maintains control of the companies authorised to make the translations on its behalf to protect quality of translations
As a Member of the public	This is absolutely of importance to ensure that criminals who have fled another country do not line work directly with the public.
As a Member of the public	All drivers should be fluent in English.