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## **Regulatory Services Committee MINUTES**

**Of a meeting held in the Penn Chamber, Three Rivers House, Rickmansworth, WD3 1RL on Wednesday, 11 June 2025 from 7.30 pm - 9.03 pm.**

**Present:** Councillors

Harry Davies (Chair), Raj Khirya (Vice Chair), Ciaran Reed, Narinder Sian, Anne Winter and Oliver Cooper (Substitute) (In place of Andrea Fraser)

**Officers in Attendance:**

Lorna Curtis, Lead Licensing Officer  
Matthew Roberts, Development Management Team Leader  
Ludmilla Iyavoo, Interim Deputy Chief Legal Officer (Litigation and Licensing) and Deputy Monitoring Officer  
Anita Hibbs, Committee Officer

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### **RG30/21      APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillor Debbie Morris, Councillor Andrew Scarth and Councillor Andrea Fraser, with the appointed named substitute being Councillor Oliver Cooper.

### **RG31/21      MINUTES**

The minutes of the Regulatory Services Committee, special meeting, held on 25 April 2025, were confirmed as a correct and signed by the Chair.

### **RG32/21      NOTICE OF URGENT BUSINESS**

There was no other business.

### **RG33/21      DECLARATIONS OF INTEREST**

There were no declarations of interest.

### **RG34/21      REVIEW OF HACKNEY CARRIAGE AND PRIVATE HIRE POLICY 2022**

The Development Management Team Leader introduced the report.

Members expressed concern about eliminating fire extinguishers from vehicles, emphasising that having them as a safety feature could be beneficial, rather than relying solely on calling the fire service in an emergency. Officers responded by explaining that the removal aligns with guidance from the Department for Transport (DFT) and the Fire Service, which recommend that individuals should not attempt to fight fires but instead evacuate and call emergency

services to avoid personal risk. Members referenced statutory guidance from the National Fire Chiefs Council (NFCC), suggesting that if fire extinguishers are required, proper training should also be mandated. In response, officers explained that training drivers is challenging, and noted that in practice, fire extinguishers in vehicles are often out of date or unused, supporting their removal.

Members also enquired about the MOT testing standards applied to taxi vehicles. They raised concerns about the current policy allowing vehicles with prior MOT failures or advisories on breaks and tyres to be licensed if those issues occurred before the taxi driver owned the vehicle. Members expressed discomfort with this approach, advocating for all vehicles to meet high safety standards regardless of ownership history. Officer clarified that vehicles undergo thorough MOT history checks and compliance testing to ensure roadworthiness, and significant failures are considered during licensing decisions. In addition, officers advised that the policy aligns with the broader county-wide standards, and that most vehicles are under 10 years old, with older vehicles subject to stricter criteria.

Members also expressed strong concerns about allowing individuals with past abduction convictions to become taxi drivers, regardless of how long ago the offense occurred, advocating for a permanent ban. Officers explained that current policies are guided by rehabilitation principles and statutory guidance, which recommends a 10-year ban but allows for rehabilitation chances. However, officers acknowledged that applicants with violent offenses, especially abduction, are scrutinised heavily and often denied licences due to the severity of their records and associated offenses. Furthermore, Members argued the appropriateness and implications of a 10-year ban on dangerous driving convictions for taxi and private hire drivers. They expressed discomfort with the length of the ban, suggesting it may be overly punitive and advocating for reconsideration. Members drew attention to the statutory guidance under the Rehabilitation of Offenders order, particularly document Annex A, which highlights regulated activities involving interaction with children, noting that the largest users of private hire vehicles in the district are related to special educational needs transport. They raised concerns about public safety and the need for stringent checks. Officers responded by confirming that drivers must be licensed both by the local licensing authority and Hertfordshire County Council.

Members queried the absence of explicit provisions for SEND children in contractual documents, and the need for drivers to be aware of potential behaviours such as absconding or disruptive conduct during transport. Officers responded by emphasising the rigorous safeguarding training drivers undergo before obtaining licenses and additional bespoke training mandated by Hertfordshire County Council, specifically for SEND school transport contracts. In addition, officers confirmed that all drivers are DBS checked.

Members discussed the issue of overcharging. Concerns were raised about the leniency of the approach where the current system allows drivers to accumulate up to 12 contravention points before facing serious consequences, with overcharging assigned 6 points and written off after 12 months. Members stated that overcharged customers are unlikely to pursue small claims court actions. They emphasised the need for stricter enforcement and harsher penalties for deliberate overcharging to protect consumers and maintain industry integrity. It was noted that incidents of overcharging are rare in the district, but the enforcement system acts as a deterrent. Officers advised that the penalty points table can be adjusted.

Members also discussed the management and implications of different types of penalty points applied to drivers, particularly in relation to TRDC and DVLA points. The Committee explored the 12-month period for writing off points in relation to vehicle and driver licences, emphasising that points are issued against the vehicle licence, which is valid for one year, while driver licences last three years. They also discussed the challenges of handling offences, such as speeding, distinguishing between deliberate and incidental infractions, and the difficulties in gathering evidence to take further action.

In response to several questions raised by Members on Group 2 medical certificate requirements for drivers, vaping rules, dual licensing rules, including taxi operation boundaries, as well as religious symbols kept in taxis and seat belt requirements for limousines, officers clarified the following:

- Group 2 medical certificate is required for lorry, coach and bus drivers. It is a Driver Standards Level Two medical test, which includes eyesight examination, among other checks. It must be completed by the driver's own family GP or alternatively by authorised D4 Drivers due to some GP's time constraints. Only registered practitioners are authorised to sign off on these medical certificates.
- With regards to vaping; officers responded by affirming that vaping should be prohibited at all times in licensed vehicles due to uncertainty about nicotine content in vaping products, emphasising that this standard should be consistent throughout the policy.
- Dual licensing – vehicles cannot have two license plates because plates are permanently fixed, which prevents confusion about licensing authorities across different districts. Vehicles must be licensed in the district where the driver holds their licence, but drivers are free to operate their trade outside their district. There is no cross-boarder hiring allowed unless a booking originates within the licensed district or is fulfilled through a private hire operator when the original operator cannot meet the booking.
- Clarity on religious symbols was provided by officers explaining that the original intention of the rule was to prevent prominent displays such as signs on windows or mirrors, rather than small personal items like hanging symbols.
- On limousines, officers explained that they are often older and modified vehicles and lack seat belts, hence the specific mention in the policy. For standard vehicles, seat belts are already a legal requirement.

Members also touched on the use and approval of mobile apps, specifically, taxi booking apps such as Uber. They raised concerns about whether there is an existing policy for approving such apps and questioned the Committee's role in setting a framework for app approvals. Officers responded by noting the increasing prevalence of taxi apps and, emphasised the importance of these apps functioning correctly by transmitting booking details to private hire operators, and providing driver and vehicle information to the customer.

Responding to further questions on seat belt requirements, officers explained that while it is a legal requirement to wear seat belts, taxi drivers are exempted from wearing them when carrying passengers, hence the use of the term 'recommended' rather than mandatory. Furthermore, when it comes to carrying children, a passenger assistant (PA) is present to help enforce seatbelt use.

Members emphasised the importance of enforcement when requiring drivers to comply with regulations, noting that without proper enforcement, the credibility of the rules may be undermined. Additionally, they appreciated the officer report's recognition of challenges related to literacy, digital access, and English language comprehension among drivers. This acknowledgement is seen as crucial because a good command of the English language is necessary for driver to understand regulations and accurately report required information.

Members focused on the introduction of Euro 6 emissions standards and age limits for vehicles within the district. They raised concerns that the proposed policy may be too stringent, potentially forcing a significant portion of the fleet, approximately, 25 vehicles, to be replaced, which could lead to a reduction in licensed drivers due to financial burdens. The discussion highlighted the importance of aligning policies with neighbouring districts and Transport for London (TfL) to maintain economic viability and avoid pricing out drivers from the

market. Officers emphasised the intention to conduct consultations with the public to understand financial implications and explore transitional arrangements or exceptions before finalising the policy. Key points include the need to reconsider vehicle age limits, especially for wheelchair accessible vehicles, and to ensure that hybrid vehicles with low emissions are appropriately exempted. The discussion also stresses the importance of coordinated policy implementation across districts to preserve economies of scale and prevent premature adoption that could disrupt the trade. Officers suggested that instead of presenting changes as fixed proposal, the consultation should pose specific questions allowing respondents to choose or suggest preferences, such as the timing for implementing emission standards or the acceptable vehicle age limit. Members emphasised the importance of framing questions to understand potential behaviour impacts, such as whether proposed changes might cause licenced drivers to leave the profession or stop being licensed, which could have significant welfare consequences for the community. They also discussed exempting zero-emission vehicles from age standards, maintaining regulatory fees, and the need to balance environmental goals with practical impacts on drivers. Officers added that there is a difficulty in maintaining the hackney carriage trade, particularly the shortage of licensed drivers due to an aging workforce and the lack of younger applicants. Members also expressed concern about the impact of allowing saloon vehicles in the hackney carriage trade, as this could potentially drive out traditional wheelchair-accessible black cabs. The higher procurement costs of wheelchair-accessible vehicles necessitate caution to avoid pricing these valuable vehicles off the road.

The Committee also discussed the potential benefits and challenges of expanding taxi ranks within the district, particularly near Warner Brother Studios. They deliberated on the need to explore establishing a designated rank or pick-up/drop-off area to address demand and concerns about private hire vehicle driver behaviour. There was emphasis on ensuring that any policy changes facilitate easier retention and accessibility of wheelchair-accessible Hackney Carriages without limiting vehicle types excessively. Officers advised that efforts to engage Warner Bros for cooperation on managing taxi trade around their area have faced challenges, but ongoing discussions and projects are planned to address these challenges.

Officers emphasised the importance of clarity regarding the proposed changes before proceeding further. Members reiterated the requests for minor changes, addressing some of the points that officers had provided clarity on earlier, including:

- application barring times and specific rules such as abduction and dangerous driving,
- standardising vaping rules across multiple pages of the report,
- clarifying religious symbol allowances under personal effects,
- a recommendation to exclude discussions on app policies from this consultation to avoid delays, proposing it to be a separate document, and finally;
- minor typo errors that will need to be corrected within the document.

Members confirmed their support delegating officers to implement these changes without further committee review, allowing for a prompt consultation release.

Members clarified however, that the proposed changes on emission standards, vehicle age limit and flexibility for wheelchair-accessible vehicles will require more in-depth discussions before consultation. Officers advised of the option of arranging an extraordinary committee meeting to allow for the discussion. Members responded that there should be an opportunity to discuss and influence the proposed changes prior to consultation, although not necessarily through an extraordinary meeting. It was noted that the current stage is for providing suggestions and the policy is not final.

The Chair called for a conclusion and read out the officer recommendation.

Councillor Ciaran Reed proposed the following amendment to the recommendation, seconded by Councillor Raj Khiroya, that:

**Option 1:** *Officers are authorised to commence public consultation to propose changes to this policy, having amended it, taking on board the comments that were made by Members this evening, following the expiry of the consultation, for the policy to be brought back to the Regulatory Services Committee for agreement, before adoption at Full Council.*

On being put to the Committee the motion was declared CARRIED by the Chair having been agreed by general assent.

RESOLVED:

**Option 1:** *That officers are authorised to commence public consultation to propose changes to this policy, having amended it, taking on board the comments that were made by Members this evening, following the expiry of the consultation, for the policy to be brought back to the Regulatory Services Committee for agreement, before adoption at Full Council.*

**RG35/21      OTHER BUSINESS - IF APPROVED UNDER ITEM 3 ABOVE**

None

**CHAIR**