

Appendix 4: Public consultation responses

Consultation from 1 August to 29 September 2025											
Responses	Do you agree with the suggested changes to the emission/age standards?	As you have answered no, please expand upon any possible implications which may arise from the changes	Please provide any comments on the dates for implementation	Do you believe that zero-emission vehicles should be exempt from the age	Do you believe that greater consideration should be given to extending the age criteria for wheelchair accessible vehicles	Please provide any alternative suggestions	Do you agree with the use of saloon vehicles as Hackney Carriages?	As you have answered no, please expand on any possible implications which may arise	Do you believe an initial cap of 3 saloon vehicles is appropriate?	What other suggestions do you believe could be considered to assist the black taxi	If you have any further questions or comments to make regarding the changes to the policy please enter them here
1	Yes			No	12 years is reasonable		Yes		Yes		
2	Yes			No	12 years is reasonable		Yes		Yes		
	Yes		Perfect	Yes	12 years is reasonable	Any vehicle more than 10 years old Compliance certificate should be two times a year Three times too	Yes		Yes	N/a	
3											
4	Yes			Yes	12 years is reasonable		Yes		Yes		
5	Yes			No	12 years is reasonable		Yes		No		
6	No			Yes	12 years is reasonable		Yes		Yes		
7	Yes			Yes	12 years is reasonable		Yes		Yes		
	No	Rising vehicle and insurance costs, combined with limited earning opportunities because platforms like Uber do not accept Three Rivers licences, already make it difficult for drivers to sustain a living. Tightening vehicle age standards would force costly replacements at the worst possible time, deepening financial hardship during a cost-of-living crisis. The risk is not only to driver livelihoods, but also to the availability of affordable local transport provision for residents if licence holders are forced to exit the market. Maintaining the current standards is therefore essential to balance safety with economic viability for drivers.		No	12 years is reasonable		Yes		Yes		The licensing process in Three Rivers urgently needs modernisation. New applicants face an unclear and outdated knowledge test with no guidance or preparatory support, unlike neighbouring councils that offer structured courses. Requiring detailed knowledge of road names is no longer relevant in an age where GPS and digital navigation are standard, and numerical "pence counting" questions are equally outdated given that most payments are now digital, especially post-Covid. At the same time, licence fees for new applications in Three Rivers exceed £800, far higher than Transport for London (£477 including DBS, excluding medical) and Watford Borough, both of which are more competitive. Raising costs further would deter new applicants and weaken the trade. In today's market, customers predominantly use apps such as Uber or Bolt, yet these large operators like Uber, do not accept Three Rivers licences, leaving drivers at a competitive disadvantage. Meanwhile, cost of vehicle, insurance, and maintenance continue to rise, and drivers are already struggling to cope with reduced margins in a highly competitive environment where private operators also take 20–30% commission. If vehicle standards, particularly age limits, (as proposed) are tightened further, it would impose an additional and unsustainable financial burden, creating a domino effect that undermines drivers ability to earn a basic living. Furthermore, the market is shifting rapidly toward electric vehicles, with operators like Uber requiring drivers licensed under TfL to adopt EVs. In London, the charging infrastructure is in place to support this transition. However, in Hertfordshire such infrastructure is lacking, making it unrealistic to expect drivers to invest in EVs without proper support. For these reasons, Three Rivers Council should modernise its licensing process, align fees with neighbouring authorities, avoid raising vehicle standards prematurely, and explore partnerships with major operators to ensure local drivers can compete fairly in the current market.
8	No	Only 2 cabs operating in South Oxhey, 1 being euro 5. Cab drivers aren't rich, these changes will push the price of a previously owned taxi (not new) to our £40k. Lack of drivers now, this will destroy the trade. This will also decimate the school transportation for vulnerable children!	Too soon!	No	Greater consideration required	If a vehicle passes compliance and mot with a clean and tidy passenger section, let it be used to provide a service!	No	They're mini cabs/ Private Hire. They haven't got the space for walkers, wheelchairs, buggies, shopping and often a combination of these!	No	Busses, such as vitos, transporters and similar vehicles without wheelchair would work.	If this goes ahead I'm unable to carry on a service to my community. The initial financial burden along with the monthly payments, maintenance and repairs make it untenable! This needs to be thought through properly and the outcome that this creates achieves anything at all positive. 1% of the world pollution is all the UK creates, the country could shutdown tomorrow and it wouldn't make a blind bit of difference to the CO ₂ percentage in the atmosphere. 0.04% is the amount of CO ₂ in the air BTW, up from 0.03 since the industrial revolution! 0.02 or below all plant life dies? Perhaps stopping the shipping wooden pellets from The Americas, cutting down the amazon and blowing things up in the forever wars would be a better place to start!