

Status of Consultee	Comments	Section of Policy	Officer Comments and Recommendations
Ward Cllr	<p>Fuel tanks/fuel supply. What restriction if any will apply EV and their batteries</p> <p>Vehicle testing, allowing for fair wear & tear but subject to use (mileage covered) eg brakes/exhaust systems bearing in mind an MOT is only valid on the day the vehicle passed. Perhaps consideration could be given by annual (6 month testing) with a visual badge to be displayed ideally on the licence plate or/and in the vehicles fares line of site</p>	<p>2.2.4</p> <p>2.2.5</p>	<p>No change to the policy. This is dependent on individual vehicles</p> <p>No change to the policy considered necessary. With regards to the testing of vehicles currently vehicles that are under 5 years old have to present not only an MOT but also pass the Council's inspection criteria which requires more than that of a MOT. Vehicles that are over 5 years have to be tested every 6 months.</p> <p>Licensing officers proactively visit the taxi ranks and inspect vehicles as well as call them to attend Swale House for random inspections.</p> <p>Experience tells us that licensed operators require that drivers who work for them inspect their vehicles themselves, normally daily, so that any defects can be picked up and remedied as it is not in the operators interest to have defective vehicles on the road. The same can be said for independent drivers whose car is actually their means of earning a living.</p>
Ward Cllr – same Cllr with further comments	<p>Is SBC looking to license the driver or indeed drivers e.g. What is preventing a vetted driver being the possible vehicle owner allowing the licensed / tested vehicle being used for hire & reward [shift work] by a none vetted HMRC listed party. Similarly is it not possible that such none HMRC listed parties may not be insured for the purpose of hire & reward?</p> <p>A further concern is the safety of vehicles re an annual test is only as good as the day of the test & could fail the next day or even minutes after the test, may I suggest that all vehicles used or those</p>	<p>2.2.5</p>	<p>This is a question requiring a response rather than a change to the taxi policy. Response is: There is nothing that can actually stop a licensed driver permitting an unlicensed driver to drive their vehicle but if found out then they would face a Licensing Sub-Committee who would have the ability to revoke the licensed driver's badge. The unlicensed driver would be prosecuted. Any tax breach discovered would be reported to HMRC.</p> <p>No change to policy necessary. With regards to the testing of vehicles currently vehicles that are under 5 years old have to present not only an MOT but also pass the Council's inspection criteria which requires more than that of a MOT. Vehicles that are over 5 years have to be tested every 6 months.</p>

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	that qualify for a Hackney Carriage & or Private Hire license vehicles are tested every 6 months.		<p>Licensing officers proactively visit the taxi ranks and inspect vehicles as well as call them to attend Swale House for random inspections.</p> <p>Experience tells us that licensed operators require that drivers who work for them inspect their vehicles themselves, normally daily, so that any defects can be picked up and remedied as it is not in the operators interest to have defective vehicles on the road. The same can be said for independent drivers whose car is actually their means of earning a living.</p>
Operator	What financial support is available for companies to change their fleets to electric vehicles from diesel or petrol by 2030, is there support and plans for charging points around Swale as currently they are still few and far between. Ideally the placement of charging points at ranks would benefit hackney vehicles	1.2.5	<p>This is a question that requires a response rather than a change to the policy. The response is: Work is currently being undertaken to install more charging points within the borough. It is intended to require a lower licence fee for electric vehicles for a temporary period of time. This will be finalised later in 2022.</p>
Member of the public	<p>It is time that Swale caught up with the rest of Kent and the UK and allowed Uber and other ride sharing operations in the borough.</p> <p>Over the last 2 years it has become increasingly impossible to get a taxi. My wife travels to London 3 days a week and struggles to find a taxi to take her from Minster to Sittingbourne station.</p> <p>I would encourage you to open the borough to ride sharing apps. It will improve the service massively, offer new flexible employment opportunities and related tax income</p>	General comment	<p>No change to the policy as this involves legislation rather than local policy.</p> <p>Swale BC like every other authority has no power to stop Uber or any other ride sharing app within the borough as the Deregulation Act 2015 made it lawful for any company that has a private hire operator's licence, private hire vehicles and private hire drivers licensed with one authority to work in the boundaries of another local authority without being licensed in that borough. It is the decision of Uber not to work in Swale rather than them being prevented from doing so.</p>
Driver	I would like to suggest that Swale council introduce a standard policy on contactless payments throughout the borough. It is becoming clear that	General comment	Noted. It is not intended to introduce a 'standard policy' in this regard as this is a business decision to be made by drivers and operators.

	<p>many operators and individual drivers are setting their own rules regarding contactless payments.</p> <p>It is becoming embarrassing when a customer has to go to 3 or 4 taxis before they find one which takes card or will take card for the cost of the fare. It is becoming a regular sight of customers being grilled on their destination before the driver decides whether to take the customer or not if they are paying by card.</p> <p>It is obvious that currently the needs of the Swales residents are not being met, which is at the heart of your new Hackney policy.</p>		<p>Taxi drivers may only refuse a fare if 'there is reasonable excuse to do so'. Customers should be encouraged to report any refusals by drivers to the licensing team to investigate and take appropriate enforcement action.</p>
Driver	<p>The reason for this email is that I think it mentioned something about a course that any driver that had been suspended would have to attend in order to satisfy the Hackney department that they are fit to hold their badge. With that in mind has it or would it be worth considering to make that course or something similar a requirement to hold a restricted private hire only badge thus replacing the knowledge test as all fares are pre booked and plenty of time to look up directions or sat nav before pick up. It seems to be the case now that Swale are losing potential income as any new drivers on a private hire are just going up to Wolverhampton to get a badge. I've held my licence now for nearly 18 yrs so obviously I have no real vested interest in this but</p>		<p>Noted. No change is proposed to the draft policy</p> <p>The issue of having 'restricted private hire badges' was considered by the General Licensing Committee of 15th January 2022: https://ws.swale.gov.uk/meetings/ieListDocuments.aspx?Cid=152&Mid=2317</p> <p>At this meeting it was resolved that:</p> <p><i>Resolved:</i></p> <p>(1) That after consideration, introducing a new category of Private Hire Drivers' licence, being a restricted licence for school run contracts only, without the need to undertake the elements of the current Street Knowledge Test relating to routes and locations is not agreed.</p>

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	just thought as the policies passed will be for the next 5 yrs maybe worth considering,		<i>(2) That after consideration, removing the requirement of testing knowledge of routes and locations for all applicants sitting the current Street Knowledge Test to obtain a Private Hire Drivers' licence be not agreed.</i>
Swale licensing officer	<p>Street Knowledge Tests (SKT)– Street Knowledge Tests cost £25 for each test taken. In the past few months we have had applicants cancel their test at the last minute to 'roll over' onto another date which involves unnecessary work for licensing officers and also precludes being able to offer a test to another applicant on our waiting list.</p> <p>It would be much better of the SKT fee was applicable for each test where an applicant has said that they will attend and will not be allowed to 'roll over'</p>		Agreed. The test fee of £25 will not be 'rolled over' if an applicant cancels an SKT unless there are exceptional circumstances to do so.
KCC Transport	<p>para 1.4 - the list of Consultees at items d and e are both better combined as KCC Public Transport.</p> <p>The Executive Summary on p4 refers to members of the public as 'he or she' but all references to the driver are 'he'</p> <p>Appendix A para 22.3 – the Vehicle Inspectorate ceased to exist in 2003, being replaced by VOSA which was itself replaced by DVSA in 2014.</p> <p>Appendix B para 4.1 – unless required by the hirer. KCC requires all vehicles operating client transport services under contract, regardless of whether they are classified as a limousine or</p>		<p>Noted. Agreed. Policy to be changed.</p> <p>Noted. Reference to be changed.</p> <p>Noted. Wording to be changed</p> <p>Noted. Operators will have to comply with KCC requirements when using a vehicle for a 'school run' contract.</p>

	<p>executive or similar, to display a licence plate to the rear of the vehicle. This is to ensure the vehicle can be identified as a licensed vehicle by parents, schools and KCC officers.</p> <p>2.12 – The issue of ambulance licensing can be contentious and centres around the definitions of the terminology.</p> <p>“An Ambulance Service is an Ambulance Operator, who is providing Ambulance Transport Services to or from a place of Medical Treatment, to a sick or injured person, in a vehicle which is specially designed for the purpose of carrying sick or injured persons” and Medical Care is “Treatment given by a Person who’s name appears on the Statutory Register”, and “A place of Medical Treatment may be any place where such a person who’s name is on the statutory register is in attendance for the purpose of which” .</p> <p>Ambulance means “A Vehicle which is constructed or adapted for, and used for no other purpose other than, the carriage of sick, injured or disabled people to or from welfare centres or places where medical or dental treatment is given, and is readily identifiable as a vehicle used for the carriage of such people by being marked “Ambulance” on both sides.” Road Vehicles (Registration and Licensing) Regulations 1997.</p> <p>This definition has presented challenges when it has been expected that an ‘Ambulance’ could be an appropriate form of transport to take a client to and from their school or day care facility due to</p>		<p>Noted. This will be considered on an individual basis.</p>
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	<p>that client's medical condition. As the school is not 'a place of Medical Treatment' and the vehicle is therefore being used for a purpose other than the carriage of sick, injured or disabled people to or from welfare centres or places where medical or dental treatment is given, it cannot be operating as an Ambulance whilst so doing.</p>		
Operator	<p>Here are some of my concerns and reasons behind some of the proposed policy changes.</p> <ol style="list-style-type: none"> 1 Lack of public chargers 2 School runs 3 Range 4 Disable vehicles 5 Cost and availability of vehicles 6 Airports and seaports 7 Refusing customers 8 SBC to charge vehicles 9 SBC grant <p>Point 1 Lack of public chargers</p> <p>At the time of writing this, there are 14 public chargers in Swale. The majority of taxis and private hire vehicles in Swale survive by having a school run because there is not enough work to rely on the taxi ranks. Many of the school runs are long, therefore most vehicles would most likely require charging straight after. This means that Swale customers waiting for a taxi would have to</p>		<p>Noted. These issues are for the determination of Members. Please see section 4 of the main report for comments</p>

	<p>wait for them to be charged before being ready to serve the public.</p> <p>Drivers want to work a shift, without driving around Swale looking for an available charger before starting to work on the taxi ranks, prebooked work and phone bookings.</p> <p>Until there are more chargers fully electric taxis will not work with the current lack of fast chargers.</p> <p>Many of my drivers live in either flats or they live in terraced streets with no guarantee of parking outside their homes. Without private parking, it makes charging at home impossible. Would the council put in fast chargers at the council or a car park solely for all licenced vehicles and include all charging fees as part of our plate costs? We would then be able to pick up all drivers to take them to their fully charged vehicle to start their shifts.</p> <p>Point 2 School runs</p> <p>SCL currently have 19 school contracts with KCC that are between 100 and 150 miles a day we would not be able to do any work before school runs as we could not guarantee we would have enough battery to fulfil our contractual runs. Currently, it is not feasible to run a taxi company without school contracts as the drivers would not make enough money to stay in business.</p>		
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	<p>Point 3 Range</p> <p>At present, the vehicles that are on the market that are similar to our existing fleet, do not have the range to cope with our taxi work.</p> <p>For example, an 8 seater Vauxhall e Vivaro has a range of 141 miles on a full charge without taking into account the extra weight of the disabled access passengers and luggage. Therefore this vehicle would not be able to make the round trip to the closest airports.</p> <p>Point 4 Disabled vehicles</p> <p>For some time now I have been showing an interest in which electric vehicles are being released, and if any of them could be used for the trade. At present, there are many issues with going fully electric. As mentioned in point 3 the Vauxhall Vivaro 8 passenger seat minibus has a range of 141 miles, however, it cannot be adapted to be wheelchair accessible due to the low roofline and batteries in the floor, meaning you cannot fit the ramp or fixing bolts for the straps. Fitting a false floor is also not possible again due to the batteries being in the floor.</p> <p>The only purpose built wheelchair vehicle on the market is the Nisan NV200 which Swale have recently bought. However, these vehicles cannot carry 8 passengers and luggage. When the wheelchair is in use there is only one seat for a</p>		
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	<p>carer or passenger and that is in the front with the driver, so should the disabled passenger require any help the driver would have to stop in order to get out of the vehicle to assist that passenger.</p> <p>Would the council allow currently disabled access vehicles to continue to be licenced past the year 2030?</p> <p>Point 5 Cost and availability of vehicles</p> <p>Four seater cars maybe ok to replace the current diesel and petrol cars that we currently have, however, these are a lot more expensive to buy than the current favourite Skoda Octavia. However, the 6 and 8 seater prices are out of the price range of operators the Vauxhall e Vivaro is around £40,000 and Mercedes e Vito is £70,000 both only have ranges of 141 and 211 miles range, if in ideal conditions and not being driven on the dual carriageways and motorways. However, neither can be licenced due to the reasons given in point 4.</p> <p>At the moment we still find ourselves not being able to purchase second hand vehicles due to the inflated market caused by the microchip shortage not to mention covid. Brand new vehicles would need to be ordered with waiting times being around 9 to 12 months for normal petrol or diesel. At the time of writing, there are 7,627 electric vehicles on Auto Trader of which 1,374 are in</p>		
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	<p>white, most are small superminis or SUVs unfit for the use of a taxi.</p> <p>www.nextgreencar.com/emissions/low-emission-cars/ gives you a list of cars under the proposed new rules most are small hatchbacks no room for airport luggage or expensive Audis that would get trashed by customers.</p> <p>Point 6 Airports and seaports</p> <p>Based on a normal non-covid world we would be running to and from the airports and Southampton seaports. Under the proposed new rules this would now not be possible, due to the lack of range as mentioned in point 3. The most common airports we go to are Heathrow and Gatwick which are approximately 154 and 105 miles return from Sittingbourne. Based on the current vehicles on sale, it would mean we would have no choice but to refuse to transport to Swale residents. The reason being we'd have to allow extra travelling time to charge, with the possibility of needing to stop with passengers onboard if we were travelling further to say Southampton Seaport or Luton Airport. This is without taking into account the battery deteriorating with the constant charging.</p> <p>Point 7 Refusing customers</p> <p>As a taxi, we are not allowed to refuse a fair without a proper reason, however, you will now</p>		
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	<p>have the problem of drivers refusing a fair as they do not have enough range left. This could be genuine reason due to a booking or school run however, you will find drivers that do have enough range making out they do not. even if they do just because they do not like where the customer is going.</p> <p>Point 8 SBC to charge licenced vehicles</p> <p>Would the council put chargers in Swale House or a few council owned car parks solely for licenced vehicles so that they can definitely be available 24/7 to enable us to do our job as mentioned in point 1?</p> <p>That would give operators the option to pick up and drop off drivers in one of our current regular minibuses.</p> <p>In my own previous experience of having to park a taxi and walk home unfortunately some opportunist lowlifes, think drivers are easy prey to rob them of their shifts takings.</p> <p>Point 9 SBC Grant</p> <p>Would the council give operators a grant to help with the extra money that would be needed to purchase these new vehicles? Or would the council buy all vehicles so that operators can lease them from you?</p>		
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	<p>In summary, I am not against change and looking to reduce emissions but it cannot be done as quickly as you are hoping neither the manufacturers nor the borough has the vehicles or chargers in place available in time for the 1st April 2023.</p> <p>Having spoken with other operators across Swale a lot of them have expressed their opinion that they will be forced to cease trading and look for work elsewhere or licence in another area.</p> <p>No operator has the finances to invest in a dying trade with next to no new drivers coming through. If nothing is done to get more drivers working we will all be closing our doors as we will have no drivers. As our current drivers retire or look for work, elsewhere as we would not be able to afford or run our business under the proposed new rules. As you are aware KCC do not have enough operators to carry out the transport for the required pupils there are still 26% of pupils without school transport now after KCC retendered contracts.</p> <p>I also have concerns that if other close towns do not also follow suit, you may find other taxis getting booked for taxi jobs in Swale as there will no longer be any Swale taxi companies that can afford to stay in business.</p>		
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Operator	Comments attached as Appendix III		These are issues for the determination of Members. Please see section 4 of the main report for comments
Driver	My view on the fully electric car situation is we are not ready to enter that situation as a taxi as their are not enough charging points also the price off a fully electric car does not financially cover the monies earnt in a day espically if long distance fares towards the end off the day will be refused as their won't be enough electric in the car to do the journey because as a taxi driver working from the station it is impossible to plan your day..	Appendix I paras 2.3 – 2.5	Please see section 4 of the main report for comments
Operator	Verbal comments after face to face meeting with the trade Can the age limit for drivers entering in the trade be lowered from the existing 21 years of age		<p>Agreed. The DfT Best Practice Guidance for Licensing Authorities in England currently out to consultation states: It does not seem necessary to set a maximum age limit for drivers provided that regular medical checks are made. Nor do minimum age limits, beyond the statutory periods for holding a full driver licence, seem appropriate. Applicants should be assessed on their merits</p> <p>The existing wording within the policy will be changed from:</p> <p>3.2.1 A licence to drive a hackney carriage or private hire vehicle will not be granted to a person who is under 21 years of age. However, no upper age limit is proposed provided that a driver can demonstrate that they are still medically fit to hold such a licence. In this respect therefore, if a driver wishes to continue to be licensed once they reach 65 years of age the licensing authority shall require that they obtain a medical certificate at yearly intervals.</p> <p>To:</p> <p>3.2.1 A licence to drive a hackney carriage or private hire vehicle will not be refused solely on grounds of age provided that a driver can demonstrate that they are medically fit to hold such a licence.</p>

			<p>Add paragraph 3.2.4 Drivers who are under 21 years of age should have no DVLA penalty points on their DVLA driving licence.</p>
<p>Comments at Face-to-Face meetings</p>	<p>Street Knowledge Tests.</p> <p>At present there are questions relating to routes which are split into 2 sections which are routes relating to the specific area a driver wishes to work in and also routes covering the whole of the borough. It is difficult for any applicant to revise routes for all of the borough and they are likely to use a SatNav. Are these routes necessary</p> <p>Could a list of routes asked in the SKT be made available to candidates to revise before sitting the SKT</p> <p>Could prospective drivers be given a badge to work for a limited period e.g. 6 months so that they can learn 'on the job' and then be made to sit the SKT?</p>	<p>Appendix E</p>	<p>Noted. Whilst it is still deemed important that a driver knows the area in which they work without having to resort to a SatNav, it is acknowledged that expecting applicants to have knowledge of routes across the whole of what is a very large borough could be seen as unreasonable and it is proposed that these questions are removed from the SKT.</p> <p>At the moment we do not have sufficient questions to make this feasible. However, in the coming months we will build on our bank of questions and when ready will make this available to applicants.</p> <p>The licensing team have recently been made aware of 2 local authorities in Essex who have launched pilot schemes 'Learn to Earn' whereby drivers are given a trial period to work as licensed drivers without first having passed an SKT and are then required to sit the SKT. Licensing Officers will research this in more depth and if it is felt that this is something that is feasible and lawful will report back to Licensing Committee at a later date with their findings.</p>