

CONSULTATION RESPONSE GRID

Status of Consultee	Comments	Section of Policy	Officer Comments and Recommendations
Operator	<p>"Private Hire vehicle – A vehicle licensed by the authority to undertake pre-booked work. It must have no more than 8 passenger seats. It may stand at ranks. Bookings must be made in advance via a private hire operator licensed by the same authority. It cannot ply for hire."</p> <p>What is meant by it may stand at ranks?</p> <p>"Restricted Private Hire vehicle – Private Hire vehicles with conditions applied restricting their use."</p> <p>What is a restricted private hire vehicle/license?</p>	1.2.9	<p>Noted. This is an error wording has been changed in the draft policy</p> <p>Noted: A proposal for restricted private hire vehicle and driver licences is included in section 4 of the main report</p> <p>Description of the proposal for restricted private hire vehicle and driver licences provided to Operator.</p> <p>A proposal for restricted private hire vehicle and driver licences is included in section 4.14 – 4. of the main report</p>
Janet Hill Climate Change Officer	the target for being net zero carbon has changed to 2045 from 2030 (this should be adopted by the Environment Committee on 18 th March)	2.4.2 Appendix A 2.6	Please see section 4.6 – 4.13 of the main report for comments
Ward Cllr	The note below from one of my residents is self explanatory. He feels a restricted licence is the best fit for his business and would like the council to consider this. If there is no policy specifically allowing officers to make a determination, then can this please be brought to the Licencing Committee by way of a report at the earliest opportunity. I have copied the Committee Chairman, Cllr Carnell for convenience.	3.1.3, 3.3.3 Appendix A 23.1, 23.2 Appendix F 5.3, 5.4	Noted: A proposal for restricted private hire vehicle and driver licences is included in section 4.14 – 4. of the main report
Operator	A Restricted Licence which includes DBS Check, Medical, Vehicle Checks, MOT, Insurance and Driving Licence Checks.		

CONSULTATION RESPONSE GRID

	<p>This would greatly improve my chances of employing drivers as the other checks are not fit for purpose for this contract with Peel Ports.</p> <p>Peel Ports and the Marine Pilots have also offered to support this by writing a supporting letter for this request.</p> <p>Subject: Proposal for a Restricted Taxi License</p> <p>I hope this letter finds you well. I am writing on behalf of [REDACTED], a local company that has been providing transportation for Maritime Pilots between ports on behalf of Peel Ports for over 20 years. In recent years, we have encountered significant challenges in recruiting new drivers, a process which has been further complicated by stringent licensing requirements that we believe are not relevant to the specific nature of the work we do.</p> <p>One of the primary obstacles in our recruitment efforts is the requirement for new hires to pass a local knowledge test in order to obtain a taxi license. Given that our drivers are responsible only for transporting Maritime Pilots between ports, we feel that local knowledge of areas such as supermarkets and nightlife is unnecessary and does not align with the specialised, on-call nature of our work.</p> <p>To illustrate the impact of this requirement, we recruited our most recent driver in June. However, due to the need to pass the local knowledge test, and DBS checks we were unable to offer them a position until January. As I'm sure you can appreciate, a six-month waiting period from recruitment to starting a position is a significant deterrent to potential candidates and has hampered our ability to fill vacancies in a timely manner.</p> <p>Our drivers operate on an on-call basis, working a specific number of hours within a 24-hour period. Some of the most</p>	<p>3.1.3, 3.3.3 Appendix A 23.1, 23.2 Appendix F 5.3, 5.4</p>	<p>Noted: A proposal for restricted private hire vehicle and driver licences is included in section 4.14 – 4. of the main report</p>
--	---	---	--

CONSULTATION RESPONSE GRID

	<p>common routes include trips between Sheerness Docks and Ramsgate and Harwich, as well as Scotline on Medway City Estate. These trips are solely for the purpose of transporting Maritime Pilots from Peel Ports, and therefore, there is no requirement for our drivers to have local knowledge beyond these routes.</p> <p>In an effort to streamline our recruitment process and ensure that we can continue providing essential services to Peel Ports, we would like to propose that the council consider granting [REDACTED] a restricted taxi license for Marine Pilots only. This restricted license would allow our drivers to operate solely for the purpose of transporting Maritime Pilots between ports, while excluding other types of taxi work. This would help us avoid the current barriers posed by the local knowledge test and allow us to hire drivers more efficiently, ensuring that we can continue supporting the local maritime industry.</p> <p>We believe this proposal would benefit both our company and the local economy, and we would be grateful for your support in considering this adjustment to the current licensing requirements.</p> <p>Thank you for your time and consideration. We look forward to the possibility of discussing this proposal further and working together to find a solution that benefits all parties involved.</p>		
NPHTA	<p>Good morning, i have had a quick glance so far at this, and notice quite a serious error that may benefit from amendment whilst a live document and at consultation stage, it would appear someone missed the word "not" to make it read "may not sit on ranks" for private hire.</p>	1.2.9	Noted. This is an error wording has been changed in the draft policy

CONSULTATION RESPONSE GRID

	<p>I also notice the suggestion in the subject of CCTV of "approved by", do you have such an approved list? If not then this may need to be amended, either to have an approved list, not only to assist licensees in identifying a compliant product / device / suppliers, but also to reduce burden on officer time to review each and every request, also might be worth noting and including somewhere, that since the condition is must satisfy and comply with ICO regulations, this rules out the use of dashcams for any internal recording at all, even if this is just audio, audio is internal recording and is therefore not compliant.</p> <p>I will review the rest in more detail after consulting with members and respond accordingly if there are more aspects of concern as we read with more detail.</p>	2.6.1 – 2.6.5	<p>There is on wording within this section of the policy regarding CCTV that states CCTV must be “approved by” Licensing officers 2.6.6 refers to drivers installing a protective screen/shield around the driving seat, the make, type and design must be approved by authorised officers of the Council, we do not have an approved list for screens/shields</p> <p>On checking the ICO guidance does not prohibit the use of internal cameras, but uses the example that the recordings should not be continuous and be capable of being switched off for example if the driver is using the vehicle for private use. Audio is considered particularly intrusive and should only be used in exceptional circumstances so if fitted must be switched of and only activated when justified Additional considerations for technologies other than CCTV ICO</p> <p>The impetus is on the taxi operator to ensure they are complying with the regulations.</p>
Operator	<p>I have read through the policy and would like to congratulate you on listening to the trade and DFT more than in previous years.</p> <p>Especially relating to the point of extending the life of vehicles past the current age limit and the new school-only driver badge & vehicle.</p> <p>The only thing that jumps out at this moment that is a concern to me is regarding Signage 4.8 PH vehicles to be fitted with permanent signage on the front doors stating "Pre-booked only"</p>	Appendix A 4.8	Operators have the option of licensing executive vehicle which are exempt from the requirement to display plates or signage.

CONSULTATION RESPONSE GRID

	We have a customer base that likes the fact that our PH vehicles are discreet, not showing that they are getting out of a taxi/minicab/PH.		
Operator	<p>In regards to the new taxi policy proposal, my biggest concern is the proposal on Appendix A 2.6, From 1st April 2027 lowering the CO2 emissions to 75gms, by lowering this to 75gms makes buying hybrid vehicles unattainable, most importantly MPV's and Wheelchair access vehicles which there are Hybrids available, most of our fleet 95% is made up of</p> <p>MPV's and Wheelchair vehicles, at this current time there are no electric 9 seater vehicles and I believe from talking to dealerships there is nothing in the pipeline to produce wheelchair electric vehicles, also to take in account is the cost,</p> <p>for instance we recently purchased 2 brand new seven seat Hybrid MPV's Dacia Jogger's costing £23700 each and a CO2 108g which we will not be able to purchase after 1st April 2027, currently a seven seater (PHEV) plug-in vehicle a Hyundai Santa Fe £55k, Mazda CX80 £55k and a Volvo XC90 £75k when you look into EV's prices are in most cases are around the same price, there are not many choices in the EV and plugin vehicles for MPV'S, There is no viable way to make these worth the investment, we would not be able to reinvest and maintain a fleet at these costs, although the cost of vehicles have increased substantially in the last 8 years some have almost doubled, you can</p> <p>already see the impact of higher vehicle costs by the amount of Taxi's licenced with Swale council currently according to</p>	2.4.2 Appendix A 2.6	Please see section 4.6 – 4.13 of the main report for comments

CONSULTATION RESPONSE GRID

	<p>your policy there is in total 216 Hackney and PH vehicles and 293 drivers, In 2018 /2019 there was 326 vehicles licenced with Swale a difference of 110 taxis around 33% less now, with this policy being implemented in 2027 to lower CO2 to 75gms will see less and less vehicles being licenced.</p> <p>I would ask the council to delete the CO2 emissions limit altogether and implement instead "you will not licence any Diesel or Petrol euro 6 vehicles after 1st April 2027" with the uncertainty of the government in regards to now looking at keeping hybrids I hope this proposal would be a better option'</p>		
Public Transport Kent	<p>2.9 Given the period of time since the applicable legislation has been repealed, it may be that there is no on-going need to refer to it.</p> <p>2.12 Registration with the BAA shouldn't in itself permit the vehicle to be used for anything other than the operation of an Ambulance service - 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 Treatment 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>From the County Council's perspective, we would need to avoid the situation where an 'ambulance' is exempted from licensing but then operates a 'non-ambulance' service for</p>	<p>2.9 – 2.91</p> <p>2.12.1 – 2.12.2</p>	<p>Agreed – removed from policy</p> <p>Agreed – wording amended on the policy.</p>

CONSULTATION RESPONSE GRID

	<p>hire and reward, eg conveying children between home and school.</p> <p>3.1.3, 3.3.3 , Appendix A 23.1, 23.2 and Appendix F 5.3, 5.4 Reference to ‘client transport services operated under contracted to a Local Authority’ might be more encompassing than ‘school runs/ school run contract/school contract run’.</p> <p>4.8 Whilst the 1976 Act covers this point adequately, it would be helpful to reference that some contractual obligations into which they may enter might preclude the sub-contracting of services and that it is incumbent upon them to ensure they are permitted to do so under the terms of that contract</p> <p>Appendix A 18.1 presumably an emailed version of the certificate would be acceptable</p> <p>23.2 and Appendix F 5.3 It may not be possible for a PH Operator to demonstrate that they hold a specific contract at the time of application; the County Council will not award a contract to an Operator/driver if they are not licenced.</p> <p>26.7 and Appendix B 4.1 The County Council <u>always</u> requires an external plate to be displayed when operating a contracted client transport service so that the vehicle is readily identifiable to the client’s parent/carer and the school. Suggest that ‘unless required by the hirer’ be added.</p>	<p>3.1.3, 3.3.3 Appendix A 23.1, 23.2 Appendix F 5.3, 5.4</p> <p>4.8.1</p> <p>Appendix A 18.1</p> <p>23.2 and Appendix F 5.3</p> <p>26.7 and Appendix B 4.1</p>	<p>Agreed – wording amended on the policy.</p> <p>Agreed – wording amended on the policy.</p> <p>Noted. - wording amended on the policy.</p> <p>Please see section 4.14 – 4. of the main report for comments.</p> <p>Noted. The hirer contract should make this clear to the vehicle operator and the operator should not enter into the contract if they are not willing to abide by the terms and conditions of said contract</p>
--	---	---	---

CONSULTATION RESPONSE GRID

	<p>29.1 Does 'suitable' in this context mean that the alternative must be licensed as a PH/HC?</p> <p>Appendix C</p> <p>6.1.9 We are concerned that a badge may be issued without having a current DBS check, which appears to conflict directly with 6.1.10 and is also contrary to general principles set out in 3.12.1 and Appendix D 1.7. It is understood that, on occasion, the delay in the DBS certificate being produced is because there is relevant information to be collated which itself might be cause for concern.</p>	<p>29.1</p> <p>6.1.9</p>	<p>Agreed – wording amended on the policy.</p> <p>Noted – Temporary Badges are only issued to existing drivers renewing their Badges or where a driver has not renewed their subscription to the update service. DBS checks are carried out via the DBS update service every 6 months, temporary Badges for renewing drivers would only be issued where a DBS certificate has been received or an update check has been completed within the last 12 months. Wording amended to include this point</p>
Operator/ Driver comments Face to Face meeting	<p>What is the disability awareness training? Why do we need it, we are taxi drivers not social workers? What does it involve? Why is it the drivers responsibility to be aware of hidden disabilities? Why should they have to pay for this training? Concerns that that extra training will put off older drivers.</p>		<p>The DfT 2023 Guidance states that drivers should be trained in disability awareness and/or have their knowledge and skills assessed. Drivers should be encouraged, through targeted and general communications, to uphold the highest standards of customer service.</p> <p>Swale will therefore require that new applicants and existing drivers undertake training provided by an external company to learn or refresh skills. The aim is to provide drivers with a knowledge and understand of disabilities, their responsibilities and duty of care, information on how to load and secure passengers and wheelchairs and best practice to help them provide safe, secure transportation for all passengers.</p> <p>Officers have looked at different course options and have chosen an option that meets the recommendations of the DfT Guidance without as little time a monetary burden on drivers as possible. The course is delivered digitally, runs for approximately 3 hours and current cost of the course is £40</p>

CONSULTATION RESPONSE GRID

Operator/ Driver comments Face to Face meeting	<p>We have Concerns about the introduction of the restricted private hire badge and restricted private hire vehicles, we don't think this is a good idea. Can operators drive the a vehicle with a restricted plate?</p> <p>Will there be an age limit for the vehicle as it will not be used as frequently as other vehicles? Could the vehicle licence be a 15 year licence?</p> <p>Will the plating fee be less as the vehicle will be restricted to school runs or contract work?</p> <p>Concerns that the system could be easily abused and be difficult to enforce.</p> <p>It's not possible to provide evidence of a school contract when applying for the licences as KCC require proof of river and vehicle licence before they will accept a tender for a school contract and it is a long process.</p>	3.1.3, 3.3.3 Appendix A 23.1, 23.2 Appendix F 5.3, 5.4	<p>Please see section 4.14 – 4. of the main report for comments.</p> <p>The holder of a dual hackney carriage/private hire driver licence or a private hire only driver licence would be able to drive a restricted private hire only vehicle but only for journeys that are part of the operators contract with KCC or other contract work that has been agreed with Licensing</p> <p>For a restricted private hire vehicle as with other licenced vehicles, any extension beyond the age limits specified in Appendix A 2.1, 2.1.2 and 2.2 will be considered on a case by case basis</p>
Operator/ Driver comments Face to Face meeting	<p>We have concerns about the dates for moving to electric vehicles:</p> <ul style="list-style-type: none"> • The garages are not trained in electric vehicles, it limits which garages we can use, have to travel to Birmingham for the nearest garage for some vehicles and vehicles will be off the road longer for repairs. • Costs for electric vehicles are still too high, 50 – 60K for a plug in hybrid • Nearly impossible to get Wheel chair accessible vehicles as the batteries are located in the floor it prohibits the installation of the necessary fittings. The only feasible minibus option is a £90k Mercedes <p>The road tax is £620 a year</p>		Please see section 4.6 – 4.13 of the main report for comments

CONSULTATION RESPONSE GRID

	<ul style="list-style-type: none"> • The infrastructure is not in place there are not enough chargers at present • Manufacturers recommendation that vehicles can only be fast charged a limited number of times as this reduces the battery life span. • There are also recommendations that the battery is charged when it gets to 20% and only charged as high as 80% to prevent damaging the battery – this then only allows 60% of the battery life for use on journeys and reduces the vehicles range before it needs charging again. • Customers may have to be refused for longer journeys if the vehicle doesn't have enough charge to complete the fare • Drivers doing airport runs will have to stop at the services to charge the vehicle when they could be working on the rank, this is a waste of time and they would be losing money. • The date for mandating EVs should be removed as there will be a natural progression, emissions will naturally reduce as new vehicle models come on to the market. 		
Operator/ Driver comments Face to Face meeting	Age limit for vehicles – with officer's deciding on a case by case basis This should not be based on mileage . I do not agree with the implementation of maximum mileage as some older vehicles have high mileage but have been well maintained.	Appendix A 2.1 – 2.3	Agreed – any extension beyond the age limits specified in Appendix A 2.1, 2.1.2 and 2.2 will be considered on a case by case basis following the provision of a recent MOT and hackney/private Hire vehicle garage test and inspection of the exterior body work and interior of the vehicle by Swale Licensing.
Operator/ Driver	Some customers do not want to use a marked vehicle but to plate a minibus as executive it would need to be a Mercedes	Appendix A 26.7	Licensing will consider each application for an executive plate on it's own merits. We would expect applications to be for high end

CONSULTATION RESPONSE GRID

comments Face to Face meeting	and these are awful and expensive, the Ford Tourneo is much nicer.		brands such as Mercedes, but will accept other manufacturers on a case by case basis if the spec is luxury, for example leather interior.
Operator/ Driver comments Face to Face meeting	Can we check if drivers/vehicles have card machines when plating vehicles because drivers refuse a fare saying they have no card reader but they are using this as an excuse to refuse a fare because it's a short journey.	General Comment	<p>Card readers are not mandated, this is a business decision to be made by drivers and operators. There are certain locations within the borough where there is not a sufficient signal for a card reader and cash is the only option.</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>