

APPENDIX 2 – Consultation Responses

Position of Consultee	Comments	Officer Comments
Ward Cllr	Thank you for this. All looks very sensible to me.	None
Driver	<p>I feel like here we go again, a few years ago every vehicle had to be wheelchair accessible by a certain date. I changed my vehicle earlier than intended to beat the deadline and then there was a re-think so I changed my vehicle for nothing. I accept the council have pledged to go electric but please think of the company's that cover a lot of airport transfers. In the past pre-pandemic it has been known for one vehicle to cover 4 airport runs in a day. So with your proposals as things are with battery range I/we will lose out on work due to having to charge between jobs. It's ok if you work from the rank just doing local jobs, and charging points are located around the town. Once again the powers at the top have given assurances without looking at the wider picture. I would love it if they tried to book a taxi to the airport to be told sorry the taxi is charging so we can't help. Then again the powers who agreed to this wouldn't be going on a plane as it would be against the carbon neutral principles! I agree with the phasing out of the second mot test to a vehicle inspection by the council. I hope that the council test will be as good as or better than a MOT as I look at it I have to drive the vehicle all the time I like to know it's safe for my passenger and myself. Please could you clarify if issues are found by the council technical team we are still able to take the vehicle to our own repair garage.</p>	<p>As all taxis and PHVs could carry out multiple airport runs or other similarly long journeys, it would not be feasible to apply EV requirements to vehicles based on the nature of the journeys their drivers choose to carry out.</p> <p>The proposed safety and standards inspection would be very similar to an MOT test and include all key safety elements to ensure there is no reduction in safety. Conversely, the direct notification of any failings found from the workshop to the Licensing Team would facilitate better vehicular safety than the current arrangements by allowing for prompt intervention where needed. Additional checks would also be able to be carried out to improve standards.</p> <p>As the proposed inspection is not an MOT, drivers would not be required to take their vehicles off the road in the event of matters that would constitute an MOT failure; they may however be unable to carry out licensable work. They would be able to have any repairs carried out at a garage of their choosing, however they would also be able to have them carried out by Rosherville Servicing Ltd at Brookvale if they wished, as well as vehicle servicing and MOT tests.</p> <p>Please also see sections 5 and 6 of the main report for additional comments.</p>
Driver	<p>Okay with everything. Only question is. By all electric does that include hybrids? Petrol/Electric? Also, I have an 8 seater minibus. The cost will be considerably more than a normal saloon or an MPV.</p>	<p>All electric does not include hybrid; it refers to vehicles without internal combustion engines that</p>

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	<p>Is there any grants or subsidies available from the council or government? I will be looking to change my vehicle in 2025 so it is of significant importance to me.</p>	<p>are powered wholly by electric and produce zero emissions.</p> <p>There are not currently any council-led grants or subsidy schemes, however the proposed requirements would not take effect for several years and it is not possible to state what schemes may exist in the future.</p> <p>Please also see section 5 of the main report for additional comments.</p>
Driver	<p>Green plated vehicle drivers are paid just above minimum wage from the council and it is unaffordable for me to go to an all-electric vehicle due to the last two years schools haven't been fully opened and it will take me a few years for me to save up for me to afford an all-electric vehicle. I believe 2030 would be more suitable for drivers to be able to save up for an all-electric vehicle and even then it should be partially subsidised by the council because it is part of public transport.</p>	<p>The council does not employ nor pay local taxi and private hire drivers; it licences them (and regulates) to enable them to carry out paid-for licensable work.</p> <p>Please also see section 5 of the main report for additional comments.</p>
Driver	<p>In my opinion 6 monthly MOT system is better.</p>	<p>None</p>
Driver	<p>I would still like to keep the 2 mots a year not go to Brook Vale as it is safer for the public and myself if anything needs to be done it will be plus it helps the garage puts money back into the community.</p>	<p>The proposed safety and standards inspection would be very similar to an MOT test and include all key safety elements to ensure there is no reduction in safety. Further comments can be found in section 6 of the main report.</p>
Driver	<p>I don't agree with council inspection I think 2 mots from the garage is better and more reliable. About electric vehicles I don't think everyone has driveways to charge the vehicles also not many drivers have the funds to buy one in which case we will loosen 50% or more drivers plus the distance they can travel is not enough especially when you are using heating and electrical equipment for a trade the charge will go down very quickly I think the better option is for hybrids until 2030 by then we should have more variety and longer range of miles on the vehicles and the price should come down when there's a lot of vehicles to choose from.</p>	<p>Please see sections 5 and 6 of the main report for comments.</p>

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<p>Operator</p>	<p>I think this is a good idea this use to happen many years ago when we would get called down to Brookvale to have our taxi yearly inspection it made the drivers keep there taxis to a high standard at first theses drivers need to understand that it is the customers safety that we are looking after who wants to pay good money for a taxi an a old banger turns up I think they should all get a Range Rover as operators we do inspections on the cars that work in our office an if we get a customer complaint we call the driver round look at the car an if we think it needs a wash we won't give them any work until it's been washed I think other operators need to be more mindful of their drivers an cars working on there circuit we can't keep baby-sitting other companies drivers</p>	<p>As eluded to in this comment, the proposed safety and standards inspection would include aesthetical checks of the vehicles to ensure that they are being maintained at the required standards, as well as being mechanically safe and compliant with police requirements.</p>
<p>Driver</p>	<p>You are consultation about new electric cars in the Gravesham Borough I think we should wait until 2032 about electric cars here because there are very few cars available in the market and price for average electric car is £45000 plus and if we put finance fees its more than £50000. Only few countries are providing mobility cars as most drivers are required to have mobility cars. We can consider to buy new electric cars if council is providing 80% grant. Very limited charging stations available I am living big building flat I cannot install charging station at my flat. Very limited mechanics are available for electric cars. If the varieties of car available then competition starts between companies then prices will be down. Taxi trade is already down on our borough due to corona also Uber effect. I wish our council do something to stop Uber operating in our area as many other councils did like Maidstone. I hope you will consider my suggestions while making decision. So unfortunately i can't afford that much. There's only 2 companies doing fully electric wheelchair accessible cars which is London black cabs other i think its Nissan so both are approximately same price so its more then £50000.</p>	<p>Please see sections 5 and 6 of the main report for comments.</p> <p>Comments relating to Uber have previously been explored and considered in depth, and are not relevant to this consultation.</p>

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<p>Driver</p>	<p>I have given this proposal much thought, and feel the best way forward is to remain with the two M.O.T.'s rather than using Brookvale.</p> <p>The two M.O.T.'s are done by DVLA approved mechanics, plus on the same day I have my Taxi fully serviced, again, by fully qualified and trusted mechanics, this practice also opens the opportunity of having any M.O.T. advisories rectified on the same day, I am sure most, if not all, of the other Taxi drivers do likewise. You write of not causing more expense, but, if I have to use Brookvale, I still feel I would need to book a service for my Taxi, I doubt Brookvale will be offering this, thus causing the loss of another day's work, so loss of earnings. The two M.O.T.'s practice gives my Taxi a pre winter, and a pre summer M.O.T. and full service which I feel is correct and proper for both myself and the traveling public.</p> <p>In conclusion: I consider going back to Brookvale to be a step backwards for both drivers and the traveling public, to my way of thinking Two M.O.T.'s and two services are right and proper, and is best practice.</p> <p>In addition : I also think, in the light of what we have all had to endure for the past two years, it would be a kind gesture on behalf of the Licencing Department if you could postpone any changes to policy for a couple of years, to help the Taxi trade in Gravesham make some sort of recovery, the Covid pandemic has devastated our trade, and it is felt that it will never fully recover, our reasoning, more people work from home, so we do not take them to and from work, or to the station, online shopping has increased immensely, so our pick-ups from Town and supermarkets have suffered, and people are not going out in the evenings in anywhere near the numbers before Covid. On top of this Uber has now become the busiest operator in Gravesham without having a Gravesham Borough Council licence, quite appalling really. All of this, plus the road works going on around the rank area has, and is, causing stress and anxiety amongst some</p>	<p>Rosherville Servicing Ltd Mechanics at the Brookvale workshop are equally highly qualified, all are both DVLA and Institute of Road Transport Engineers (IRTEC) approved, with the garage also having IRTEC approval and being a DVSA approved MOT test centre. The IRTEC licence is a qualification developed for vehicle technicians in the HGV, PCV and trailer sectors and is a nationally recognised certificate which demonstrates to any employer in the road transport industry that an inspection technician has reached a required standard to undertake vehicle inspections.</p> <p>The Rosherville Servicing Ltd workshop at Brookvale provides the same services as other commercial garages so can carry out MOT testing and vehicle servicing at very competitive rates and therefore drivers would be able to continue to have their vehicle serviced and/or repairs carried out at the same time, albeit by Rosherville Servicing Ltd at Brookvale if they so wished, in the same way they currently are .</p> <p>We fully empathise with the difficult and uncertain situation that has arisen as a result of the pandemic and understand the reasoning behind suggesting that any policy changes are postponed, however postponing the proposed policy changes would result in licence holders having less time to prepare. Instead, by seeking to introduce policy changes that set out requirements many years in advance we are</p>
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	<p>of the drivers, on top of which we now have the added concerns of the rank being changed, and where are we going to be located whilst the works are taking place, taking into account that at times during the course of any day the rank is full to the roundabout at the bottom of Bath Street, all at a time when there is concern for people's mental health. Which is the reason I am asking for a postponement of changes.</p> <p>(Continued in subsequent addition response as follows):</p> <p>Further to my email to yourselves on the 6th. February in opposition to the proposal to return to Brookvale for taxi inspections, I have an additional idea which I think is worth consideration. My idea is that if licencing were to email to the drivers a list of the additional compliance checks, similar, or the same as the list Emily checked the taxi's with, we could ask the garage where we are getting our M.O.T. and service to tick off the list, stamp, with the garage stamp, or sign under the list to verify that the checks have been completed, this would negate the need to visit Brookvale thus saving us time and money. I feel this idea would work for both additional compliance checks, and the taxi drivers of Gravesham.</p>	<p>providing licence holders with as much notice as possible and the best possible opportunity to prepare.</p> <p>Comments relating to Uber have previously been explored and considered in depth, and are not relevant to this consultation.</p> <p>A positive proposal such as this is welcome. Indeed, this reflects one of the inherent benefits of inspections being carried out by Rosherville Servicing Ltd at Brookvale in terms of additional compliance checks being reliably carried out by qualified mechanics employed by the council, and the results subsequently fed back directly to the Licensing Team.</p> <p>Whilst mention is made of the driver's proposal saving the trade time and money, it is considered that the drivers' counter-proposal would not likely achieve this since the time and cost impacts of having an inspection at Brookvale would be very similar to those associated with having an MOT test at another garage. Conversely, external garages may refuse to carry out such checks, or may charge extra for doing so, and Licensing Officers would have no way of knowing how reliable such 3<sup>rd</sup> party checks would be, which would jeopardise standards.</p> <p>The proposed operation consulted on would also allow for internal digital links to be created between the Brookvale workshop and Licensing Service,</p>
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		resulting in more streamlined processing of inspection data.
Driver	<p>I have been considering the proposal regarding the two MOTs. Up to now, it has been enough to maintain the standards of the vehicles for the taxi service.</p> <p>Now you have proposed an inspection at Brookvale by the Council technician instead of the 2nd Mot.</p> <ol style="list-style-type: none"> <li>1. What will be the cost of the inspection?</li> <li>2. If it fails will there be any time to mend it before it gets suspended?</li> <li>3. Can it be repaired at Brookvale?</li> <li>4. Can I have the Mot certificate at Brookvale?</li> </ol> <p>The proposal of fully electric vehicles for new drivers from April 2025 and for everyone from 2030.</p> <p>Is it possible to have the existing drivers to replace his/her car with hybrid/petrol /euro 6 diesel vehicle between 2025 and 2030 in case their vehicle is written off?</p> <p>I would expect the overall cost for the licence will be reduced. Because the trade is not doing very well at the moment. Thank you.</p>	<p>The answers to the four questions set out are as follows:</p> <ol style="list-style-type: none"> <li>1. The cost of the inspection would not exceed the maximum cost (set nationally) for an MOT test so as to keep it comparable with the costs of MOT tests.</li> <li>2. Each case would be assessed on its merits where by a more significant failing would be more</li> <li>3. Yes – the workshop at Brookvale carries out the same services as a standard workshop so will be able to carry out repairs at a competitive price.</li> <li>4. Yes – the Rosherville Servicing Ltd workshop at Brookvale is a fully licenced DVSA MOT test centre.</li> </ol> <p>In response to the latter question, currently any new vehicle being licenced after 1 April 2025 for any reason would need to be electric under the proposals. The council is able to depart from policy under exceptional circumstances however and therefore in the unfortunate event of a vehicle being written off, and subject to the individual circumstances of each case, a decision could be made to allow another (part) internal combustion engine powered vehicle to be temporarily licenced.</p>
Driver	<p>In response to your email regarding electric vehicles. As I specialise in transporting children in multiple wheelchairs I do not feel that the infrastructure will be ready for the proposed date of 2025. The government has said that all new vehicles will be electric by 2030. I therefore do not agree/understand why GBC feel that they can bring</p>	<p>Please see section 5 of the main report, and comments directly above, for comments relating to the EV proposals.</p>

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	<p>this into play 5 years before the government.</p> <p>If in unforeseen circumstances my vehicle was to be written off after I would not be able to purchase a new vehicle to cater the kind of work I do. Currently, you are cannot buy a vehicle that can transport numerous wheelchair's with the payload and range that I require.</p> <p>I do understand what GBC is trying to achieve and it may be possible in the licensing of a salon car but the specialist vehicle's that I currently operate this would not be possible.</p>	
Driver	<p>Regarding electric vehicle changes from 2025: Is gbc going to give any help towards buying the vehicles and help with putting charging point in people's houses; there are not enough charging points in our local areas.</p> <p>These electric vehicles are good if you are travelling to one place of work, they not good for stop start on the rank and you are waiting 45 mins on the rank to get hired.</p> <p>I disagree with this idea to change vehicles to electric ones.</p> <p>I disagree with the idea of getting our vehicles checked at Brookvale depo because we used to do this when I first started driving taxis in 1990s but gbc changed it to having two mots a year.</p> <p>That mean gbc has to employ someone for who we have to pay for. We already have to have two mots a year and I think that is enough for our vehicles to be safe enough to be on the road. So I'm against with both of these proposals.</p>	Please see sections 5 and 6 of the main report for comments.
37 Drivers	<p>I consider this proposal to be a step backwards for Gravesham drivers as the introduction of two MOT tests per annum was instigated entirely by GBC on the grounds of best practice several years ago.</p> <p>If the annual check for licence renewals or new vehicle licences is to be carried out by " suitably qualified technicians" at Brookvale and the fact that the Licensing Dept can carry out spot checks at any time the necessity of an interim safety &amp; standards test instead of an MOT appears to be for the benefit of streamlining the Licensing Policies of</p>	Internal benefits of the proposals are certainly envisaged to include efficient processing of inspection data, but also the efficient granting of licences as a result, and efficient regulation where necessary arising from the reliable transfer of information to protect public safety. There is no reason for drivers to feel mistrusted; it is a fundamental role of licensing authorities to take steps to ensure that licence holders are compliant

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	<p>both Boroughs. It also gives the impression of mistrust that drivers will not keep their vehicles at the standard required.</p> <p>It is also unfair to introduce a new system without giving drivers full information on how this would work. E.G. Would the cost of the annual inspection be included in the current Licence fee as it is now?</p> <p>What happens if a vehicle fails an interim test i.e. are they given time to rectify the fault or is there immediate suspension?</p> <p>The trade is struggling to recover at the moment and the mental health of drivers is suffering with the stress of simply trying to make ends meet so is it really best practice to make these changes at this moment in time?</p> <p>Perhaps a postponement may be the most suitable option for all concerned.</p> <p>With regards to the changes being proposed with electric vehicles, I fully understand the reasoning behind these proposals however I object to them in their entirety for the following reasons; -</p> <p>1. Unsuitable/ Financially non-viable lead in period. There has been a huge decrease in trade due mostly to the massive impact of Coronavirus. This is exacerbated by the huge influx of app based companies like Uber operating within the borough, reducing the market share for each driver. The financial impact and slow recovery of the economy will make it virtually impossible to meet the high purchase price of wholly electric vehicles within the suggested period.</p> <p>2. Unsuitable/non-viability of wholly electric vehicles to provide all services required.</p> <p>The current predicted range of fully charged vehicles is not high</p>	<p>with standards and requirements, and the proposals support this.</p> <p>Please see comments above relating to costs associated with the proposed safety and standards inspection. In addition, the annual licence application inspection would continue to be included within the licence fee.</p> <p>Enforcement interventions could be applied as a result of failings however this is no different than if a vehicle failed elements of an MOT test or had advisories identified - provided such failings were proactively shared with the Licensing Team.</p> <p>It should be noted that if a vehicle fails an MOT, it becomes unroadworthy and should not be driven at all. If a vehicle fails a council inspection, it may have its licence suspended, but that would not in itself make the vehicle unroadworthy nor prevent it from being driven on the road and therefore drivers stand to be less inconvenienced if they were to fail the proposed inspections/tests than if they failed an MOT test.</p> <p>With regard to the concerns raised about the electric vehicle proposals, please refer to section 6 of the main report which addresses these points.</p> <p>Please also see sections 5 and 6 of the main report for additional comments</p>
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	<p>enough to enable drivers to continue to work in the way they have been and is significantly reduced when using heaters and lights at night and in winter. This is particularly relevant regarding larger vehicles that are more suited for wheelchair accessible vehicles.</p> <p>3. Infrastructure / charging.</p> <p>There is currently a prohibitive lack of publicly accessible charging points, and many drivers do not have a suitable property to permit charging at home (flats, terraced houses with only on-street parking etc.). The infrastructure MUST come first, otherwise electric vehicles are non-viable transport for anybody, and much less Hackney carriage / private hire vehicles.</p> <p>I hope all of the points above are considered and not taken lightly because the decisions that are made on this policy review not only effect drivers' livelihood but also their well-being.</p>	
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