

Position of Consultee	Section of Policy	Comments	Evaluation by Licensing	Change?
Anonymous	Whole Policy	<p>I am raising this point because the draft policy sets out detailed obligations relating to disabled passengers but does not address the legal protections owed to disabled drivers under the Equality Act 2010. Including this is important to ensure the policy is balanced, compliant and fair.</p> <p>Under the Equality Act, taxi and PHV drivers with disabilities are protected from discrimination, harassment and unfavourable treatment, and are entitled to reasonable adjustments throughout the licensing process. These rights apply even when drivers are self-employed, and the Authority has a duty under Section 149 (Public Sector Equality Duty) to consider them.</p> <p>To strengthen the policy and ensure compliance, I recommend including:</p> <ol style="list-style-type: none"> 1. A clear statement that disabled licence holders and applicants are protected under the Equality Act 2010. 2. A section explaining how reasonable adjustments will be provided (e.g., flexibility with testing, documentation, medical requirements, communication formats, and exemption certificates where a disability prevents certain duties). 3. Recognition that taxi and PHV drivers are “workers” for discrimination purposes, and therefore protected from discriminatory treatment by passengers, operators or the Authority. 4. A commitment that disability-related harassment of drivers by passengers will be treated and investigated as a hate incident. 5. Confirmation that medical conditions will be assessed individually and not subject to blanket restrictions, to avoid indirect discrimination. <p>Adding these points will ensure the needs and rights of disabled drivers are reflected alongside those of disabled passengers, and will support a fair, lawful and modern licensing policy.</p>	<p>Public safety must be the priority for the Licensing Authority in relation to issuing licences under this policy. The individuals that are licensed need to be able to fulfil the requirements as set out in law, byelaws and this policy. The Authority is aware of, and ensures they are adherent to, the Equality Act 2010. Should the need arise the Licensing Authority can, if supported by appropriate evidence, depart from this policy in order to address the needs of the individual.</p> <p>An additional paragraph has been added to the policy.</p>	<p>Additional paragraph added under executive summary.</p>
Taxi Driver	Appendix A	<p>Paragraphs 5.1 and 5.2</p> <p>I would recommend that the colour stipulation hackney carriage white private hire Red be removed from the criteria.</p> <p>The number of licensed vehicles from other areas operating in Medway is increasing Uber are also operating in the area. All these other vehicles do not meet Medway colour requirements or specifications. If we can allow other vehicles to operate in our area, why do we have to have a colour stipulation this is a further unfair advantage.</p> <p>Searching for a vehicle when replacing is hard enough but the colour stipulation is a further burden on Taxi drivers. Lifting the colour stipulation or at least adding further colours will assist drivers when looking for replacements.</p> <p>This requirement was added to the policy many years ago to allow medway licensed vehicles the use of bus lanes. Now all taxis from all areas are using these lanes these other taxis are of any colour.</p> <p>If the single colour remains then I would suggest that new signage is added to make it clear that only local Taxis can use these bus lanes and any other taxi would be fined if they use them.</p>	<p>At the time of the 2021 review of this policy, this requirement was brought to the Licensing and Safety Committee's attention. It was explained that it is not easy to purchase a white vehicle and it can often incur extra cost. This is due to manufacturers not making wholly white vehicles as a standard. The Committee recognised this difficulty but were concerned that the removal of this requirement would lead to a loss of identity for Medway's taxi fleet. Its retention was also considered to be important for safety reasons as customers were able to easily recognise vehicles licensed by Medway.</p>	<p>No changes recommended</p>

	Appendix A	<p>Paragraph 3 There is no provision in this section for Electric vehicles I believe there should be an extended time for use of electric vehicles and Hybrid vehicles past the 10 years. The age when first presented should be extended to perhaps 10 years and 14 or 15 years maximum use. I believe this should be put in place as it would help with meeting future green requirements as there are less emissions. It would also help drivers affordability as these vehicles are generally more expensive. Any grants help or assistance available is only available on these types of vehicles. The extended vehicle use may persuade drivers to switch to electric or hybrid. It may also be an option to split these into 2 categories hybrid and full electric this would enable different lengths of service for each category. Hybrid up to 8 years old for first licence then up to 12 for maximum age. Full electric up to 10 for first licence maximum age 15 years.</p>	<p>As detailed in the report to Cabinet in November 2025, it is Licensing's intention to carry out a mid-term review of the policy in relation to the climate change implications and preventative measures that could be put in place. This would include the provisions around electric or hybrid vehicles. Further evidence would need to be obtained in relation the longevity of electric vehicles overall.</p>	No changes recommended
Taxi Driver	Main Body	1.3.1. - Safety cannot always be guaranteed when there are so many out of town vehicles working in Medway	The Licensing Authority ensures that the individuals it issues licences to meet the required criteria. Cross-border hiring is legally permitted. Should a member of public or Medway licensed driver have any concerns in relation to safety involving an out of area driver, they should report it to the relevant Local Authority and Kent Police in an emergency.	No changes recommended
	Main Body	2.4.1 2.4.4. - The problem in Medway is there are too many Hackneys. Who have not set hours. We need a temp.suspension of H C licences. In favour of ph drivers and vehicles. To cover the work operators need ph vehicles, so they can give a better service. We need 200 to 300 more.to bolster companies so they can cover all the work. (Who does the majority of ph work in Medway? Uber do, as they can offer coverage)	It is down to each individual to decide which type of licence they would like to apply for, Hackney Carriages can work for operators if they wish to do so. We can carry out an unmet demand survey, to see if there are jobs that are not being completed, this would be a large amount of work to be carried out and there would be a cost involved. Hackney Carriage drivers are dual licenced so they can carry out Private Hire work, therefore we do not believe that this would offer public value for money at this time or be an appropriate use of officer time.	No changes recommended
	Main Body	2.5.2. - We need to think of starting a "Taxi bus" service to cover more rural parts of Medway. Perhaps utilize, operators who have restricted vehicles and drivers like SAS and Strood cabs, this may help people feel less isolated.	This type of transportation service would not be covered by this policy. A licensed private hire operator is restricted to carrying out work that is pre-booked. The idea of a vehicle travelling from A to B, just in case there is someone wanting a lift would not meet these criteria. Medway's restricted drivers and vehicles are named as such due to the conditions attached to their licence which restricts the work they can carry out. The majority of these are restricted to educational transport only.	No changes recommended

Main Body	2.8.6. - There are a few drivers who fit larger wheel/ tyres when having their meter calculated for distance. Then put smaller wheel/ tyres back on ,so to make more money (so the rumors say)	When a meter is fitted or updated the meter agents provide the proprietor/driver with a certificate confirming the fit or update. The certificate asks for the tyre size to confirm that the meter tariff has been calibrated correctly. Should the Licensing Authority receive any complaints or evidence supporting this allegation, it would be investigated.	No changes recommended
Appendix A	It does not matter what colour the car is,if it says "Taxi" people will get in it.	At the time of the 2021 review of this policy, this requirement was brought to the Licensing and Safety Committee's attention. It was explained that it is not easy to purchase a white vehicle and it can often incur extra cost. This is due to manufacturers not making wholly white vehicles as a standard. The Committee recognised this difficulty but were concerned that the removal of this requirement would lead to a loss of identity for Medway's taxi fleet. Its retention was also considered to be important for safety reasons as customers were able to easily recognise vehicles licensed by Medway.	No changes recommended
Main Body	3.7. - I think us drivers, should have on line refresher courses, as Medway is expanding and hundreds of new roads sre being built.	The knowledge test is designed to test the applicant's knowledge before they become a driver. The inclusion of a refresher to all existing licensed drivers would come at a fee. The Licensing Authority do not have the resources to create, implement and administer a refresher course at this time. From spot checking other authorities, each is carrying out the pre-application Knowledge test as per the DfT's guidance.	No changes recommended
Whole Policy	Also at Weekends to create taxi only (local)zones, in places that have a lot of hospitality like Rochester high st, Rainham . With a dedicated out of town cab, pick up area. We as Medway drivers feel that most of the time, we are being undermined in favour or ride/hale and out of towners. Examples, You can go to part of Rochester,(Blue boar lane and Northgate on weekends) and see 7 or 8 Ubers parked one behind the other, if it was Medway ph vehicles, they would get a rebuked as parking like that constitutes a rank! Which we all know iis illegal.So a taxi zone would stop all this it would be safer for passengers and make us feel you are on our side. The council (all parties) was supposed to set out a policy to stop Uber (as agreed at the meeting at St Georges centre) and its like from being her.	The idea of a dedicated pickup/drop off zone is not something that Licensing alone could implement. This is a matter that would need to be discussed, in relation to feasibility, with other departments of Medway Council.	No changes recommended
Whole Policy	I think the should be random drink and drug testing, to bring us in line with other parts of the transport industry .	The policy meets the standards as set out in the Department of Transport's Best Practice Guidance and the Statutory Taxi and Private Hire Vehicle Standards. Neither of these recommend the implementation of random drink and drug testing. The enforcement of driving under the	No changes recommended

			influence of drugs and alcohol remains the responsibility of the Police Authority.	
	Whole Policy	We (drivers) have lots of good and practical ideas to help provide a good and safe taxi service for Medway, we are not against the council, we just want fairness.We live in the real world, and cost is a big factor, so we just live in hope. If there is a member of licensing or the committee, who we can contact with ideas,please an you let the be known.	All licensed drivers, proprietors and operators have the Licensing email address and are able to submit any comments or ideas to us at any time.	No changes recommended
Taxi Driver	Appendix A	<p>I am writing to formally request that the Council consider extending the maximum licensed age limit for Restricted Private Hire Vehicles from the current 10 years to 20 years.</p> <p>Restricted Private Hire Vehicles operate for only a very small portion of the day, unlike standard private hire or taxi vehicles that are in constant use. Because of this limited daily operation, these vehicles experience significantly less wear and tear and generally remain in excellent mechanical and cosmetic condition well beyond the current 10-year age limit.</p> <p>In addition, the requirement to replace a vehicle once it reaches 10 years places unnecessary financial strain on restricted private hire drivers. This affects many drivers, but it can be especially difficult for female drivers like myself, who often work restricted hours due to childcare and family responsibilities. Many of us are already balancing the challenges of providing for our children while managing limited working hours and tight budgets. Being forced to replace a well-maintained vehicle solely because of its age adds further pressure to an already demanding situation.</p> <p>As an alternative, I would like to propose that at the end of a vehicle's 10-year age point, the Council carries out a comprehensive inspection for a fee to assess whether the vehicle remains safe, roadworthy, and suitable for continued licensing. If the vehicle meets the required standards, it should be allowed to continue operating instead of being prematurely replaced. This approach protects safety while reducing unnecessary financial burden on drivers.</p> <p>I kindly ask the Council to review this policy and consider extending the age limit, supported by thorough inspections, to better reflect the actual condition and usage patterns of Restricted Private Hire Vehicles, and to support drivers—especially those with limited working hours and family responsibilities.</p>	<p>The age criteria were reviewed and updated at the 2021 review of this policy. At that time the ages were introduced to support Euro 6 compliance. The inspection of vehicles to test whether they remain 'safe, roadworthy and suitable for continued licensing' can become a grey area. Standards can be interpreted in different ways and a vehicle that one person would pass, another wouldn't.</p> <p>Licensing appreciate that restricted vehicles, that provide educational transport only, are limited to journeys twice a day only in term time. However, the length of those journeys and the effect on the vehicles used are not equally quantifiable. The policy could not therefore impose a restriction or lift such a restriction for all such vehicles.</p>	No changes recommended
Licensing Officer	Appendix A and B	<p>My comments are made in relation to Appendices A and B of the above policy and makes recommendations as to the detail regarding vehicle standards at the time of inspection from Approved Garages and Licensing Officers. I would like there to be a publicly available document contained as a schedule in the policy or otherwise and available on the Gravesham and Medway Council Website with minimum standards for licensed vehicle to achieve at point of first licensing, renewal and during the currency of the vehicle licence. This is intended to complement the information already present in Appendices A and B. This schedule has been created from a guidance note for approved garages currently in use.</p> <p>By having the schedule publicly available, it will demonstrate transparency and highlight expectations of the minimum standards from licensed vehicles by Medway Council licensed vehicles. This will inform drivers before making purchases of second hand vehicles, reduce calls to an already busy office. It will also serve as a tool to ensure consistency across the fleet. Vehicles falling below these standards will require remedial action.</p>	Licensing agree that such a document being made available to the trade would be of assistance to them. It is recommended that this be added to the website. The majority of the details specified in the proposed document already form part of this policy, and we do not need to duplicate this information.	No changes recommended

	Appendix A	Firstly, the current 10-year vehicle age limit for taxi drivers is both unfair and unrealistic. Vehicles have become increasingly expensive, while taxi work is no longer as profitable as it once was. Many drivers are struggling to sustain themselves in the industry, and being forced to replace vehicles so frequently creates significant financial hardship. I respectfully suggest that there should either be no vehicle age limit, or that it should be extended to at least 20 years, provided the vehicle continues to meet all required safety and roadworthiness standards.	The age criteria were reviewed and updated at the 2021 review of this policy. At that time the ages were introduced to support Euro 6 compliance. The inspection of vehicles to test whether they remain 'safe, roadworthy and suitable for continued licensing' can become a grey area. Standards can be interpreted in different ways and a vehicle that one person would pass; another wouldn't.	No changes recommended
Taxi Driver	Appendix A	Secondly, the requirement for company door signs is unnecessary, particularly for drivers who operate independently. Displaying company branding serves little practical purpose in such cases and often results in damage to vehicle doors, reducing the vehicle's value and leading to additional repair costs. I believe this requirement should be reconsidered or made optional.	All work carried out in a private hire vehicle must have been allocated by a licensed private hire operator. Every private hire vehicle must be linked to at least one operator. Door signs are the only way to advertise this as they are not permitted to have top lights. The door signs help the public check that they are getting into the correct vehicle. Hackney carriage work is either from a taxi rank or picking up following a flag down or hail. Whilst they can, hackney carriages are not required to be linked to a licensed operator. Hackney Carriage vehicles must have a top light, which makes them clearly identifiable as Medway licensed vehicles. Door signs ensure clear visibility of the fleet to the public.	No changes recommended
	Appendix C	Finally, with regard to driving offences, minor speeding offences should not result in such severe consequences. Where a driver has no serious motoring convictions, the threshold for suspension of a taxi licence should be at least 12 penalty points, in keeping with principles of fairness and proportionality. Taxi drivers depend entirely on their licences for their livelihood, and minor infractions should not jeopardise their ability to work.	The Council's position in relation to motoring offences is in line with the DfT standards. We take each application/offence on a case by case basis and decide the relevant action. We do not consider it appropriate to allow an applicant/driver to build up to 12 DVLA penalty points, consisting of 2 to 4 separate offences over a 3 year period, before action is taken. Our drivers must be held to a professional standard to ensure the safety of the travelling public. If 12 or more DVLA penalty points are accumulated within 3 years, a driver can be disqualified from driving.	No changes recommended
Taxi Driver	Appendix A	Firstly, I would like to comment on the current vehicle age limit of 10 years. I strongly believe this limit should be increased. Replacing a licensed vehicle is extremely costly for drivers, particularly in the current economic climate where fuel, insurance, maintenance, and living costs have all risen significantly. Many drivers are struggling financially, especially as a large proportion of work has moved to operators such as Uber, resulting in reduced income for local taxi drivers. Provided a vehicle is well maintained, regularly inspected, and meets all safety and emissions standards, its age alone should not be a determining factor for licensing.	The age criteria were reviewed and updated at the 2021 review of this policy. At that time the ages were introduced to support Euro 6 compliance. The inspection of vehicles to test whether they remain 'safe, roadworthy and suitable for continued licensing' can become a grey area. Standards can be interpreted in different ways and a vehicle that one person would pass; another wouldn't.	No changes recommended

	Appendix A	Secondly, I would like to raise concerns regarding the requirement for door signs. In my experience, these signs offer very little practical benefit to either passengers or drivers. However, they do cause damage to vehicle paintwork and body panels over time, which reduces the value of the vehicle and increases repair costs. Identification can be sufficiently achieved through internal plates, licence discs, and digital booking records without the need for permanent or adhesive door signage.	<p>All work carried out in a private hire vehicle must have been allocated by a licensed private hire operator. Every private hire vehicle must be linked to at least one operator. Door signs are the only way to advertise this as they are not permitted to have top lights. The door signs help the public check that they are getting into the correct vehicle.</p> <p>Hackney carriage work is either from a taxi rank or picking up following a flag down or hail. Whilst they can, hackney carriages are not required to be linked to a licensed operator. Hackney Carriage vehicles must have a top light, which makes them clearly identifiable as Medway licensed vehicles. Door signs ensure clear visibility of the fleet to the public.</p>	
Taxi Driver	Appendix A	One of the main challenges relates to vehicle age limits. Since 2021, newly licensed vehicles have been restricted to a 10-year lifespan for non-WAV vehicles and 15 years for WAV vehicles. While safety is paramount, the age of a vehicle does not necessarily reflect its condition. I believe this restriction should be removed, provided vehicles continue to meet all safety, compliance, and testing requirements, as this would ease a significant financial burden on drivers.	The age criteria were reviewed and updated at the 2021 review of this policy. At that time the ages were introduced to support Euro 6 compliance. The inspection of vehicles to test whether they remain 'safe, roadworthy and suitable for continued licensing' can become a grey area. Standards can be interpreted in different ways and a vehicle that one person would pass, another wouldn't.	No changes recommended
	Appendix C	I would also like to raise concerns regarding the current penalty point threshold. At present, drivers who accumulate more than two SP30 offences (6 DVLA points) may face suspension or revocation of their taxi licence. For many drivers, taxi driving is their sole source of income. I strongly feel that a licensed driver should only face suspension or revocation once they reach 12 DVLA points, in line with the national driving licence limit. Losing a taxi licence before losing a DVLA licence removes a driver's ability to earn a living prematurely.	The Council's position in relation to motoring offences is in line with the DfT standards. We take each application/offence on a case by case basis and decide the relevant action. We do not consider it appropriate to allow an applicant/driver to build up to 12 DVLA penalty points, consisting of 2 to 4 separate offences over a 3 year period, before action is taken. Our drivers must be held to a professional standard to ensure the safety of the travelling public. If 12 or more DVLA penalty points are accumulated within 3 years, a driver can be disqualified from driving.	

	Appendix A	<p>Vehicle colour requirements are another area that would benefit from review. Although I understand the need for Hackney Carriage vehicles to be identifiable, Medway operates a shared licensing arrangement with Gravesham, where there is no set colour requirement for Hackney Carriages. For consistency, I respectfully request that the mandatory white colour requirement be removed and that Hackney Carriage vehicles be permitted in any colour.</p> <p>Similarly, Department for Transport guidance advises against imposing livery requirements on private hire vehicles to avoid confusion with Hackney Carriages. I therefore request that the requirement for private hire vehicles to be red be removed and replaced with a policy allowing any colour other than white.</p>	<p>At the time of the 2021 review of this policy, this requirement was brought to the Licensing and Safety Committee's attention. It was explained that it is not easy to purchase a white vehicle and it can often incur extra cost. This is due to manufacturers not making wholly white vehicles as a standard. The Committee recognised this difficulty but were concerned that the removal of this requirement would lead to a loss of identity for Medway's taxi fleet. Its retention was also considered to be important for safety reasons as customers were able to easily recognise vehicles licensed by Medway.</p>	No changes recommended
	Main Body	<p>I would also welcome a review of the current Private Hire and Hackney Carriage knowledge tests. With increasing competition from operators such as Uber, whose entry requirements are far lower, it has become increasingly difficult for locally licensed drivers to earn a sustainable income. Making these tests more accessible—while still maintaining appropriate standards—would help support local drivers and keep the trade competitive.</p>	<p>Comment noted. The details of the knowledge test do not form part of this policy. It is something that Licensing can look at, however we do not believe we can make the test easier, to encourage more applicants, without lowering the standard of the trade.</p>	No changes recommended
	Whole Policy	<p>Finally, I would like to suggest allowing more than one licensed driver from the same household or family to operate the same licensed vehicle, provided each driver is appropriately licensed and insured. This would reduce the number of vehicles on the road, supporting environmental objectives, while also lowering the high costs associated with purchasing, licensing, insuring, and maintaining multiple vehicles. This change would make the trade more affordable and help encourage more locally licensed drivers, enabling fairer competition with larger operators.</p>	<p>There is nothing stopping more than one appropriately licensed person from driving a licensed vehicle. So long as each driver holds the correct driver licence with the Council and they are appropriately insured they can both drive this vehicle.</p>	No changes recommended
Taxi Driver	Appendix A	<p>I think the age limits on Medway Hackney vehicles and private hire vehicles should be removed. It makes no sense at all that vehicles registered before 2021 can carry on being licensed and vehicles licensed after that date have a ten year age limit. As long as the vehicle satisfies the mot inspector it should be allowed to continue till the end of its life. So if I buy a brand new car for roughly between 20 and 30 thousand pounds it means in ten years time I have to change it. This in this day and age is uneconomical and not cost effective. From my experience most vehicles have a life of about 200 000 miles and then they are replaced anyway. This policy makes no sense at all. It is not a fair policy. All drivers should be treated equally and not discriminated against as to when the vehicle was licensed.</p>	<p>The age criteria were reviewed and updated at the 2021 review of this policy. At that time the ages were introduced to support Euro 6 compliance. The inspection of vehicles to test whether they remain 'safe, roadworthy and suitable for continued licensing' can become a grey area. Standards can be interpreted in different ways and a vehicle that one person would pass, another wouldn't.</p>	No changes recommended

<p>Taxi Driver</p>	<p>Main Body</p>	<p>My comments are in regards to the licensing policy section 2.5.7 - Wheelchair Accessible Vehicles.</p> <p>As a “new Hackney carriage driver” (2.5.8.1), I have purchased and am driving a wheelchair accessible taxi at the moment. I’ve been working in Medway for over 6 months and have since picked up 0 wheelchair customers - both while plying for hire and through private hire operators. My messages here are in the best interest of all wheelchair users as I understand we should all help cater for. I believe that in order to improve services for wheelchair bound customers - there should be a monetary incentive for new and old Hackney carriage taxi drivers in the form of a grant for purchasing wheelchair accessible taxis. I have spoken to a countless number of individuals whom are interested in taking the Medway Knowledge test but are put off due to the cost of purchasing a WAV. Furthermore I also know drivers who are Hackney carriage drivers but are driving private hire vehicles due to the WAV rule. I think is unfair for both the drivers and wheelchair bound customers. In order to improve this, I propose the following:</p> <p>New Hackney carriage drivers should be given an option - either to purchase and drive a wheelchair accessible taxi or to provide a payment to Medway Council to help create a grant fund whereby any driver can apply for and receive payment of these funds to aid purchasing a wheelchair accessible taxi. This way, more existing drivers will be incentivised to purchase a wheelchair accessible taxi and the drivers who currently are put off driving a WAV have the option to pay the council to aid another driver to purchase a WAV.</p> <p>The licensing policy states that the council would “encourage all drivers to consider disability when changing their vehicles” - with this implementation, the council will be able to encourage existing drivers to purchase WAVs through the grant system.</p> <p>I believe we should have a choice to drive a WAV or to not, furthermore with the WAV rule it is very difficult for us new drivers to purchase a vehicle which is better for the environment - most WAVs currently operating in Medway are diesel, including mine, which aren’t good for the environment - perhaps implementing a policy idea whereby drivers can drive WAVs or electric vehicles of any nature could be beneficial - as many electric cars on the used market have fallen dramatically in price - making them more in reach for drivers, offering the council a payment to help promote disabled vehicles perhaps between £500 - £2000 and being allowed to drive an electric vehicle may be a good option to consider.</p> <p>I have already purchased a WAV and may consider purchasing an electric vehicle as well to use for private work - providing a grant payment to Medway Council for an existing driver to use to aid the purchase of a WAV if this scheme comes about.</p> <p>In conclusion, the grant system would be funded by new drivers and WAV drivers - incentivising old drivers to purchase WAVs - there are considerably more older drivers than new drivers and the number of new drivers joining are slow due to the WAV rule - the option of being able to drive an electric vehicle will promote new drivers - and the payments they make to the council will help old drivers purchase WAVs - everyone wins.</p> <p>This scheme would be beneficial to wheelchair users, new drivers and old drivers, the council would be able to increase the number of WAVs in Medway through this method and I highly advise it to be at least considered for the benefit of the Medway Taxi trade for a sustainable future</p>	<p>As stated within the policy licensed wheelchair accessible vehicles are an important part of the transport system. They are available at locations and times that other transport is not. The Council knows that it needs to increase the proportion of wheelchair accessible vehicles in its fleet and believe that the current requirements are the best way to do this.</p>	
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Trade union	Main Body	<p>2.5 Wheelchair Accessible Vehicles ; In order to maintain and gradually improve the balanced nature of the licensed fleet, the Council will continue with the requirements set out in 2.5.7 and 2.5.8.</p> <p>There has been a small positive increase in the number of WAV in Medway. However it must be pointed out that the WAV requirement for new Hackney Carriage drivers that was introduced in the last policy has been put in place with zero dialogue with the disabled community in Medway to assess their needs. Drivers that have this costly restriction added to their HC licence feedback to the MLTDA that the demand for WAV's in Medway is very low with many drivers stating that since driving these vehicles that they have not had one WAV fare from the ranks and others stating that potentially the ramps are not suitable for the heavier electric chairs.</p> <p>It must also be pointed out that in Medway we have a private hire operator, Driving Miss Daisy, that offers a dedicated booking for WAV.</p> <p>The WAV requirement for new Hackney Carriage licence holders does require further dialogue and the MLTDA are keen to engage with licensing and the wheelchair users in Medway to ensure we are making the correct provision moving forward.</p>	<p>For clarity, Driving Miss Daisy is not dedicated to wheelchair work alone, they are a companionship service for anyone. The company currently licenses only 2 vehicles in Medway.</p> <p>At the time of the 2021 review and again this year, Medway Access Group were consulted directly. However on neither occasion did we receive any response.</p>	No changes recommended
	Main Body	<p>Section 9.1.1 Taxi Ranks The new taxi rank on Medway Street by the Waterfront bus station is not listed in this section.</p>	<p>Have contacted the Parking department as to whether the location is a designated rank. Parking are currently investigating and will let the Licensing Team know the outcome.</p>	No changes currently recommended
	Appendix E	<p>Penalty points Code P1 Failure to wear a driver's badge When the requirement to wear a drivers badge was introduced in 2021 it was very quickly removed after it was highlighted by the MLTDA that wearing a badge could cause harm to the driver in the event of an accident if the airbags were deployed. There have been several reports nationally where motorists have been involved in accidents while wearing a badge on a lanyard that have received a punctured lung. There is also a strangulation risk to the driver while wearing a lanyard if a potential attack were to take place.</p> <p>It was agreed by the previous licensing manager Mandy Francis and confirmed by email to the MLTDA that licensed drivers would remain compliant to the policy providing that their driver badge be kept in public view in the front of the vehicle. This section of the penalty points Code P1 requires updating accordingly to reflect this change.</p>	<p>Under the Local Government (Miscellaneous Provisions) Act 1976 section 54, it is a requirement for a private hire driver to wear their badge in such a position and manner as to be plainly and distinctly visible. Medway licensed hackney carriage drivers hold dual licences, so also need to meet this requirement.</p> <p>We therefore can't remove this requirement to wear the badge, however we can consider other options from the lanyards.</p>	No changes recommended

<p>Appendix A</p>	<p>'Age Criteria: Both hackney carriage and private hire vehicles shall be no older than three years at a time of first licensing (and no older than five years on licence renewal) but that the vehicle age limit shall be relaxed in the case of vehicles in exceptional condition' The Department for transport best practice guidance 2023 states ; 'The setting of an arbitrary age limit may be inappropriate, counterproductive and result in higher costs to the trade and ultimately passengers. For example, a maximum age for first licensing may have adverse unintended consequences. A 5-year-old used electric vehicle will produce less emissions than a new Euro 6 diesel or petrol car – enabling the trade to make use of previously owned vehicles will assist it to transition more rapidly to zero emission vehicles and improve air quality. Licensing authorities should not impose age limits for the licensing of vehicles, instead they should consider more targeted requirements to meet their policy objectives on emissions, safety rating and increasing wheelchair accessible provision where this is low.' Based on the MLTDA short survey results and comments. The MLTDA would like to propose the removal of age limits on licenced vehicles. Any new vehicle licensed after the 2021 policy was introduced now meets the current policy objectives on emissions of Euro 6 standard. This is more in line with the DfT best practice guidance. If the age criteria were to be removed there could perhaps be a more stringent testing regime implemented if deemed necessary for vehicles over a certain age or mileage to ensure an exceptional standard. Vehicles are the biggest expense of operating a taxi or private hire business. To have to replace a vehicle after a 10 years or 15 years for a WAV is extremely costly and unfortunately uneconomical in the current industry in Medway. Please see below for guidance a breakdown of the costs involved in purchasing a new vehicle along with average running costs and the amount of turnover required for drivers to pay themselves a minimum wage before tax. Please see Appendix C Part 1 of the report, which shows the cost breakdown mentioned above. The below example is based on a 48 hour working week. It must be pointed out that the average driver will have to work in excess of 48 hours to come anywhere close to these turnover figures in the current industry in Medway. Please see Appendix C Part 2 of the report, which shows the cost breakdown mentioned above.</p>	<p>The current policy requirement in relation to the age of vehicles is: Non-wheelchair accessible vehicles presented for first time licensing must be under 7 years old and will not be re-licensed if they are over 10 years old. Purpose built and converted wheelchair accessible vehicles presented for first time licensing must be under 10 years old and will not be re-licensed if they are over 14 years old. The quoted ages are from the 2018 to 2021 policy. The age criteria were reviewed and updated at the 2021 review of this policy. At that time the ages were introduced to support Euro 6 compliance. The inspection of vehicles to test whether they remain 'safe, roadworthy and suitable for continued licensing' can become a grey area. Standards can be interpreted in different ways and a vehicle that one person would pass; another wouldn't.</p>	<p>No changes recommended</p>
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Appendix A	<p>Vehicle Criteria Door Signs Following the MLTDA short survey it has been put forward that we remove the obligation and licensing requirement to have operator door signs on our vehicles.</p> <p>At present all Hackney Carriage and Private Hire vehicles are required to display door signage identifying the operating company. However all Medway licensed private hire operators use digital dispatch systems. These systems provide passengers with full vehicle and driver details at the point of booking. Given this, it is felt that door signage is no longer required and is not necessary for identification purposes.</p> <p>Many of the newer vehicles licensed also have aluminium doors so magnetic door signs cannot be used. These vehicles have to have a vinyl sticker applied permanently. Therefore these cannot be removed when the vehicle is not in use.</p>	<p>We do not hold any evidence to support the statement that 'all operators use digital dispatch systems'.</p> <p>All work carried out in a private hire vehicle must have been allocated by a licensed private hire operator. Every private hire vehicle must be linked to at least one operator. Door signs are the only way to advertise this as they are not permitted to have top lights. The door signs help the public check that they are getting into the correct vehicle.</p> <p>Hackney carriage work is either from a taxi rank or picking up following a flag down or hail. Whilst they can, hackney carriages are not required to be linked to a licensed operator. Hackney Carriage vehicles must have a top light, which makes them clearly identifiable as Medway licensed vehicles. Door signs ensure clear visibility of the fleet to the public.</p>	No changes recommended
Appendix C	<p>1.14 'the accumulation of more than six current points on a DVLA driving licence.' It has been put forward by our MLTDA members that the current suspension or revocation policy of a Hackney Carriage or Private hire licence for a driver incurring 6 or more points on their DVLA licence is unfair. It is appreciated that all licensed drivers must remain safe to carry the travelling public in order to remain licenced, however the current policy could be deemed excessive when a driver could lose their livelihood due to having 2 or more SP30 offences on their DVLA licence. It must be pointed out that we agree with the policy standard of revocation or suspension for other driving offences like dangerous driving or driving while disqualified etc and this request only refers to any SP30 (minor speeding offences). Other local authorities around the country have amended their policy to reflect the fact that SP30 offenses can be commonplace taking into account the length of time a licensed driver may be on the road at any one time along with the amount of miles driven that often may be in areas not familiar to them outside their licensed area.</p>	<p>The Council's position in relation to motoring offences is in line with the DfT standards. We take each application/offence on a case by case basis and decide the relevant action. We do not consider it appropriate to allow an applicant/driver to build up to 12 DVLA penalty points, consisting of 2 to 4 separate offences over a 3 year period, before action is taken. Our drivers must be held to a professional standard to ensure the safety of the travelling public. If 12 or more DVLA penalty points are accumulated within 3 years, a driver can be disqualified from driving.</p>	No changes recommended
Appendix A	<p>Standardisation Currently in Medway all Hackney Carriage vehicles must be a standard colour of White and all Private Hire vehicles must be a red. The Department for Transport (DfT) guidance on Hackney Carriage (HC) states that all Hackney Carriage vehicles must be identifiable as a HC to the public for immediate hire. So in the instance of Medway the colour white is the standard colour for public identification of a HC vehicle along with the Medway taxi livery of the for hire top light. However the DfT states that as a private hire vehicle cannot ply for hire, licensing authorities should not impose a livery so that the public confuse a PH vehicle with a HC vehicle. Therefore it has been suggested that we remove the colour of red as a requirement for a ph vehicle to include any colour apart from white. With the continued decline in driver numbers in Medway and a top heavy fleet of Hackney Carriage vehicles and drivers, this amendment would in turn allow a</p>	<p>At the time of the 2021 review of this policy, this requirement was brought to the Licensing and Safety Committee's attention. It was explained that it is not easy to purchase a white vehicle and it can often incur extra cost. This is due to manufacturers not making wholly white vehicles as a standard. The Committee recognised this difficulty, but were concerned that the removal of this requirement would lead to a loss of identity for Medway's taxi fleet. Its retention was also considered to be important for safety reasons as customers were able to easily recognise vehicles licensed by Medway.</p>	No changes recommended

		Private Hire driver easier access to a vehicle suitable for licensing as the colour red is not as a common colour as it used to be. The removal of the restrictive colour of red for Private Hire vehicles would be one step to encourage new drivers in Medway into the industry.		
	Main Body	<p>The second point that is somewhat connected to this colour change proposal of PH vehicles is the knowledge test. The policy states at section 3.7.1 ; 'In order to maintain the high standard of service and knowledge that the Council expects of its licensed drivers, all new applicants are required to pass a Knowledge Test, which is subject to periodic revision, before they will be eligible to apply.'</p> <p>The knowledge test is generally considered by the trade as unfit in its current format. Although the knowledge test does not fall under this consultation. The MLTDA feels it is necessary for immediate periodic revision. The last major review of the knowledge test was undertaken several years ago following meetings chaired by the MLTDA attended by licensing management and officers along with Medway licensed operators where a dedicated list of prominent places was agreed upon and published for knowledge test candidate revision. The MLTDA are keen to meet with licensing to discuss this matter further.</p>	Comment noted. The details of the knowledge test do not form part of this policy. Further details would be required to know why the trade believe it is unfit. Licensing are happy to have further discussions in relation to this.	No changes recommended
Licensing Manager	Appendix D	<p>Amendment of section 2.2 to reflect the wording of penalty point P51.</p> <p>Introduction of a condition relating to the actions of a driver to ensure the safety and comfort of their passenger/s and the associated penalty points under Appendix E</p>	This provides further clarity to the conditions as well as the penalty points.	<p>2.2 The driver shall behave in a civil, polite, helpful, orderly and responsible manner to the public, authorised officers or other drivers</p> <p>2.3 The driver shall take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle.</p> <p>Penalty Point P52 Failure to take all reasonable steps to ensure the comfort, wellbeing and safety of persons conveyed in, or entering or leaving the vehicle.</p>