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Consultation – summary of responses

Taxi and Private Hire Vehicle (Wales) Bill: white paper

September 2023

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh

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Overview

This document provides a summary of the responses to the consultation on the Taxi and Private Hire Vehicle (PHV) (Wales) Bill White Paper.

Action Required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

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Additional copies

This summary of responses and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [taxi-and-phv-bill-white-paper-final-draft.pdf \(gov.wales\)](#)

Contents

SECTION ONE: Overview	3
Introduction	3
This consultation	3
Who responded	4
Approach to developing the summary of responses	6
SECTION TWO: Summary of responses	7
Question 1: Definitions	7
Question 2: National minimum standards.....	9
Question 3: Types of driver’s licence	10
Question 4: Driver licence standards.....	12
Question 5: Vehicle licence standards.....	14
Question 6: Operator licence standards.....	16
Question 7: Local standards.....	18
Question 8: Local licensing administration.....	20
Question 9: Out of area enforcement	23
Question 10: Suspension of a licence	25
Question 11: Fixed penalty notices.....	27
Question 12: National penalty points scheme.....	30
Question 13: Cancelled bookings.....	32
Question 14: Cross-border hire – England and Wales	36
Question 15: Information sharing.....	39
Question 16: Zero Emission Vehicles.....	41
Question 17: Class B licences for other types of vehicle	47
Questions 18 & 19: Regulatory Impact Assessment.....	50
Questions 20 & 21: Effects on the Welsh language.....	51
Question 22: Other Issues.....	52
SECTION 3: Next Steps Statement	55
ANNEX A: List of Respondents	56

SECTION ONE: Overview

Introduction

The white paper set out our proposals to deliver on our Programme for Government commitment to modernise the taxi and private hire vehicle sector - addressing cross-bordering and reforming licensing to make services safer, greener and fairer.

This consultation

The white paper was published on the 09 March 2023, with the consultation opening on the same day. The consultation ran for 12 weeks and closed on 01 June 2023. The consultation was published on the consultation pages of the Welsh Government's website. Responses could be submitted by post, email or online – through the online questionnaire. Welsh and English language responses were both accepted.

A link to the consultation was shared with stakeholders including:

- representatives of the taxi and PHV trade;
- relevant trade unions;
- all Welsh local authorities;
- selected English local authorities and the Local Government Association;
- relevant professional bodies;
- representative organisations; and,
- organisations representing public transport users.

As part of the consultation process seven in-person engagement events were held with the taxi/PHV trade. An eighth event for the trade was held online. An additional, online event was held for members of the trade licensed in England and English licensing authorities.

Meetings were held with trade unions, Welsh local authorities and representative organisations.

All of these events and meetings were designed to seek views from stakeholders and to test the practical application of the proposals in the consultation.

Who responded

We received 148 responses. 99 of those were through the online questionnaire. Of these:

- 112 responses were from people or organisations based in Wales;
- 12 responses were from people or organisations that operate in England and Wales or the UK;
- 3 responses were from people or organisations based in England; and,
- 1 response was from a person based in Scotland.

98 of the respondents from Wales told us which local authority area they lived or worked in. We received responses from respondents located in 21 of Wales' 22 local authority areas. The highest number of responses was from Cardiff with 31. Only Gwynedd had no responses. Anglesey, Blaenau Gwent, Bridgend, Caerphilly, Merthyr Tydfil, and Swansea each had 1 response.

Those who responded through the online questionnaire were asked to select one of the following categories:

- I am a taxi/PHV passenger
- I work in the taxi/PHV trade
- I have a role in licensing and/or enforcement of the taxi/PHV trade
- Other

Respondents who sent their views by email or post were assigned to one of the same categories by officials.

The total responses by category were as follows:

Category of respondent	Responses
I am a taxi/PHV passenger	21
I work in the taxi/PHV trade	68
I have a role in licensing and/or enforcement of the taxi/PHV trade	28
Other	31

Respondents in the category "I am a taxi/PHV passenger" included 20 individuals and one organisation.

Respondents in the category "I work in the taxi/PHV trade" included individual taxi and/or PHV drivers, large and small PHV operators, and businesses which provide training to the trade.

Respondents in the category “I have a role in licensing and/or enforcement of the taxi/PHV trade” included:

- a joint response from Directors of Public Protection in Welsh local authorities;
- a joint response from the 6 North Wales local authorities;
- 17 responses from individual Welsh local authorities;
- 1 response from an English local authority;
- a response from the Welsh Local Government Association (WLGA);
- a response from the Local Government Association (LGA);
- a response from the Institute of Licensing; and,
- 5 responses from individuals.

Respondents in the category “other” included:

- Age Cymru;
- Ceredigion Green Party;
- Chartered Institute of Logistics and Transport Cymru Wales;
- Children in Wales;
- Competition and Markets Authority;
- Electric Vehicle Association (EVA) Cymru;
- FOR Cardiff;
- FSB Wales;
- GMB Union;
- Guide Dogs Cymru;
- James Button, solicitor;
- Learning Disabilities Wales;
- Leonard Cheshire;
- Mid Wales Tours;
- RNIB Cymru;
- Suzy Lamplugh Trust;
- The Older People's Commissioner for Wales;
- Unite the Union;
- Wales Safer Communities Network;
- An organisation which wished to remain anonymous; and
- Ten individuals who did not identify themselves as a passenger, working in the trade or having a role in licensing.

Approach to developing the summary of responses

This document is intended as a summary of the responses received. It does not aim to capture in detail every point raised by respondents. The consultation asked a total of 22 questions. The summary of responses has been set out in line with these questions.

For each question we have reported the number of responses and the percentage¹ of responses by category². 'Comments only' refers to responses in the form of comments without a Yes or No answer to the question. 'Other' refers to respondents not included in the categories passenger, trade, and licensing, such as representative organisations and individuals who did not identify their role.

Respondents were not required to answer every question. Some respondents provided a single general response or only responded to specific issues.

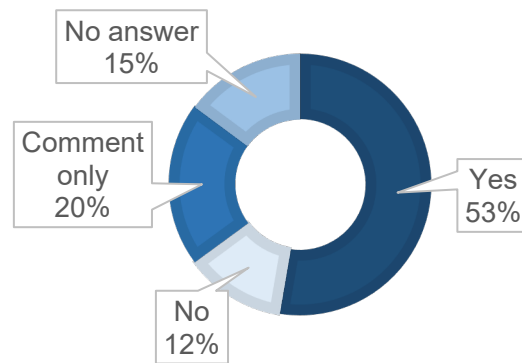
¹ Percentages may not total 100 due to rounding

² see [who responded](#)

SECTION TWO: Summary of responses

Question 1: Definitions

Are the proposed definitions of taxis, PHVs, there and then hire and pre-booking appropriate?



Responses, numbers

	Total	Passengers	Trade	Licensing	Other
Yes	78	13	45	5	15
No	18	7	8	2	1
Comment only	30	0	7	19	4
No answer	22	1	8	2	11

Responses, percentages

	Total	Passengers	Trade	Licensing	Other
Yes	53%	62%	66%	18%	48%
No	12%	33%	12%	7%	3%
Comment only	20%	0%	10%	68%	13%
No answer	15%	5%	12%	7%	35%

More than 1/2 of respondents replied Yes to question 1. But there was significant variation between categories of respondents:

- support was stronger amongst passengers and people working in the trade;
- more than 2/3 of respondents with a role in licensing provided comments only; and,
- almost 1/2 of respondents in the 'other' category answered Yes but more than 1/3 did not answer the question.

67 comments were received in total. These included technical issues and suggested changes to the definitions. Several respondents commented that many passengers do not understand the difference between taxis and PHVs and/or that the distinction

between the two is becoming increasingly blurred. Some of these were in favour of moving to a one-tier system.

Of the 78 respondents who replied Yes, 26 also commented. A few of these respondents, including the National Private Hire and Taxi Association and Wales Safer Communities Network, made technical suggestions about the definitions.

Of the 18 respondents who replied No, 11 also commented. Comments included technical suggestions about the definitions.

Of the 30 respondents who replied with comments only many raised technical issues and suggested changes to the definitions.

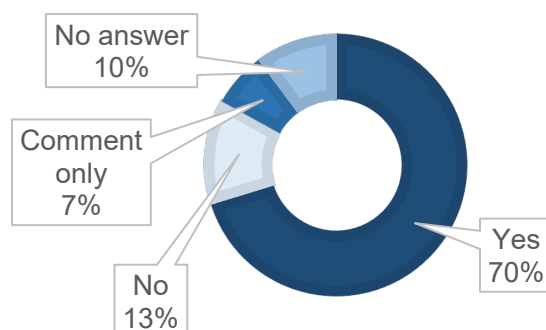
More than 2/3 of respondents with a role in licensing did not answer Yes or No but did provide comments. Amongst local authorities there was strong support for a one-tier licensing system. Directors of Public Protection replied that:

“The definitions in the consultation document of “there and then hire” and “pre-booking” are clear and enforceable. However, the fact that taxis and private hire vehicles are for the most part undertaking the same role, it seems illogical that a customer can access a taxi immediately but must pre-book the private hire vehicle; this creates an unnecessary barrier to travel. With a one tier system, the whole concept of having to pre-book a vehicle is not required.”

Respondents including Unite the Union, National Private Hire and Taxi Association and Guide Dogs Cymru stressed that private hire bookings must be taken by the operator not the driver.

Question 2: National minimum standards

Do you agree with our proposal to introduce national minimum standards which will apply to all taxis and PHVs in Wales?



Responses, numbers

	Total	Passengers	Trade	Licensing	Other
Yes	104	15	42	25	22
No	19	4	14	0	1
Comment only	10	1	5	1	3
No answer	15	1	7	2	5

Responses, percentages

	Total	Passengers	Trade	Licensing	Other
Yes	70%	71%	62%	89%	71%
No	13%	19%	21%	0%	3%
Comment only	7%	5%	7%	4%	10%
No answer	10%	5%	10%	7%	16%

There was strong support for the introduction of national minimum standards, with 70% of respondents answering Yes to question 2.

We received 78 comments in total. Of these,

- 59 were from respondents who answered Yes.
- 9 were from respondents who answered No.

Of these, 8 were individuals working in the trade. Most of these comments were about particular standards.

- 10 were from respondents who did not answer Yes or No.

Amongst these, the Competition and Markets Authority, Institute of Licensing, Licensed Private Hire Car Association, Unite the Union and Veezu Group were all in favour of standardisation. Several of these warned against too much freedom for local authorities to introduce additional local standards. The Competition and Markets Authority commented:

“We welcome national minimum standards but would urge caution over the latitude open to individual licensing authorities to impose additional standards. The introduction of minimum national standards should provide a consistent framework for operators and drivers, reducing regulatory burdens and act in the interests of passengers.”

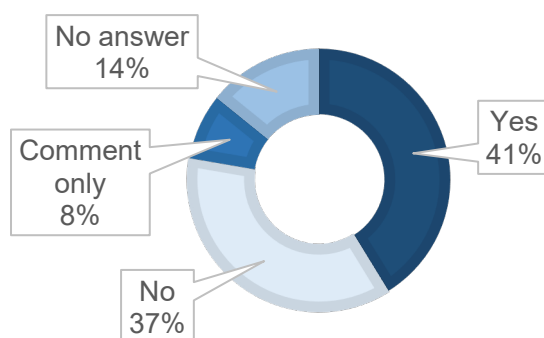
Unite the Union and the Licensed Private Hire Car Association called for the involvement of the trade in setting the standards and asked for an Equality Impact Assessment and a Regulatory Impact Assessment to be carried out.

Wrexham Chauffeurs Ltd asked for national minimum standards to be appropriate and enforceable.

A few respondents from the trade felt that national standards could not reflect the diversity of conditions found in different parts of Wales and called for local standards to be set by licensing authorities.

Question 3: Types of driver’s licence

Do you agree that local authorities should be mandated to offer separate taxi and PHV driver’s licences as well as to offer the option of a dual licence?



Responses, numbers

	Total	Passengers	Trade	Licensing	Other
Yes	61	13	30	3	15
No	54	7	24	22	1
Comment only	12	0	6	1	5
No answer	21	1	8	2	10

Responses, percentages

	Total	Passengers	Trade	Licensing	Other
Yes	41%	62%	44%	11%	48%
No	37%	33%	35%	79%	3%
Comment only	8%	0%	9%	4%	16%
No answer	14%	5%	12%	7%	32%

41% of respondents answered Yes to question 3. Support was strongest amongst passengers. Local authorities were strongly against the proposal.

We received 80 comments in total. Of these:

- 26 were from respondents who answered Yes;
- 42 were from respondents who answered No; and,
- 12 were from respondents who did not answer Yes or No.

Respondents who supported the proposal included the GMB Union, National Private Hire and Taxi Association, Uber, Veezu Group and some smaller private hire operators.

National Private Hire and Taxi Association commented:

“There is a huge sector of the industry who have no desire to ever sit on a taxi rank anywhere, only doing pre booked trips such as airport specialists or school run drivers, they have no desire or need for the hackney carriage (taxi) element, there are also those who only wish to sit on ranks, and have no desire to perform pre booked trips, for those, they have no desire for the private hire element.”

Most Welsh local authorities objected to the proposal. The Institute of Licensing noted the concerns of local authorities that many currently only issue dual licences, and that a mandate to offer separate licences would represent an administrative and cost burden. In addition, the current arrangements do not allow conditions to be attached to hackney carriage driver licences, and this is an area of concern to local authorities which should be addressed if local authorities are to be mandated to offer separate licences.

Several individuals working in the trade commented in favour of dual licences for various reasons including:

- the flexibility provided by dual licences;
- concerns that the proposal would increase the cost of obtaining licences for both taxi and PHV; and,
- concerns that the proposal would lead to an unfair reduction in standards for PHV licences.

Unite the Union commented:

“Unite believes that this is a lowering of the barrier of entry into the trade and would eventually see little or no new applications for Taxi licenses which would have a severe disruption to the disabled users of this service.”

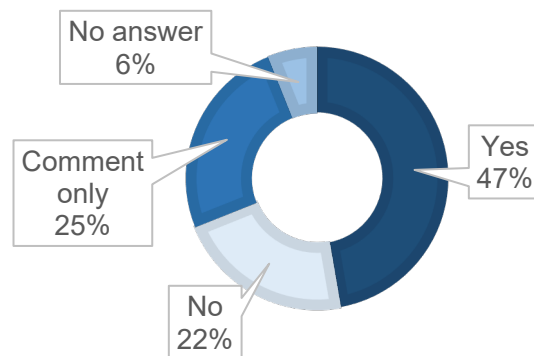
Some respondents proposed the use of restricted private hire licences. These are already issued by some local authorities and appear to be popular with the trade. A

restricted licence allows the holder to carry out only private hire contract work, such as home to school transport. Restricted licences may be issued without the need for the applicant to pass some of the assessments required for a full licence, such as a test of the applicant's knowledge of the local area.

A few respondents proposed that local authority licences should be replaced by national licences.

Question 4: Driver licence standards

Do you agree with the national minimum standards proposed for a driver's licence?



Responses, numbers

	Total	Passengers	Trade	Licensing	Other
Yes	70	15	36	4	15
No	32	6	20	3	3
Comment only	37	0	8	19	10
No answer	9	0	4	2	3

Responses, percentages

	Total	Passengers	Trade	Licensing	Other
Yes	47%	71%	53%	14%	48%
No	22%	29%	29%	11%	10%
Comment only	25%	0%	12%	68%	32%
No answer	6%	0%	6%	7%	10%

47% of respondents replied Yes to question 4. But there was significant variation between categories of respondents, with Yes responses from:

- more than 2/3 of passengers;
- more than 1/2 of respondents working in the trade;
- only 14% of respondents with a role in licensing; and,
- almost 1/2 of other respondents.

In total we received 83 comments of which:

- 28 were from respondents who replied Yes;
- 18 were from respondents who replied No; and,
- 37 were from respondents who did not answer Yes or No.

Whether respondents answered Yes, No or only provided a comment, most of the comments were about the appropriateness of particular standards. For example, there were many comments about:

- the frequency of medical checks;
- the type and frequency of DBS checks;
- whether knowledge of the local area should be tested; and,
- the content and cost of training.

Most Welsh local authorities commented that they agreed with the national minimum standards proposed for a driver's licence and went on to provide detailed views on particular standards.

A few respondents proposed that driving skills and knowledge should be assessed as part of the licensing process.

The Competition and Markets Authority commented:

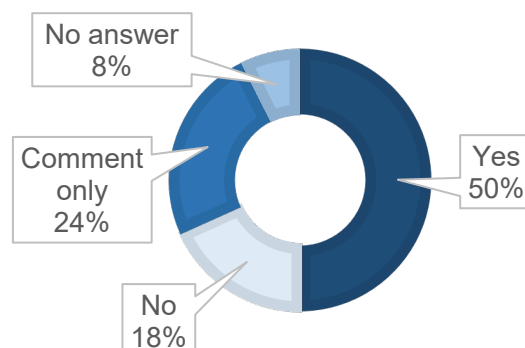
“We support regulatory requirements which enhance passenger safety. The White Paper sets out a number of standard elements, such as an enhanced DBS check. What is not set out is whether and how these would be processed and assessed consistently across all authorities. Consistency would reduce the opportunity for shopping around for a licensing authority with less strict processing and assessment standards, and ensure a consistent approach to public safety.”

FSB Wales commented:

“The standards seem rational, but they require SME and self-employed impact analysis, as well as ongoing monitoring and evaluation of impact and where they may steer the market in undesirable ways.”

Question 5: Vehicle licence standards

Do you agree with the national minimum standards proposed for a vehicle licence?



Responses, numbers

	Total	Passengers	Trade	Licensing	Other
Yes	74	16	41	5	12
No	27	5	15	2	5
Comment only	36	0	8	19	9
No answer	11	0	4	2	5

Responses, percentages

	Total	Passengers	Trade	Licensing	Other
Yes	50%	76%	60%	18%	39%
No	18%	24%	22%	7%	16%
Comment only	24%	0%	12%	68%	29%
No answer	8%	0%	6%	7%	16%

1/2 of all respondents replied Yes to question 5. But there was significant variation between categories of respondents, with Yes responses from:

- more than 3/4 of passengers;
- 3/5 of respondents working in the trade;
- less than 1/5 of respondents with a role in licensing; and,
- less than 2/5 of other respondents.

In total we received 73 comments of which:

- 28 were from respondents who replied Yes;
- 9 were from respondents who replied No; and,
- 36 were from respondents who did not answer Yes or No.

Whether respondents answered Yes, No or only provided a comment, most of the comments were about the appropriateness of particular standards. For example, there were many comments about:

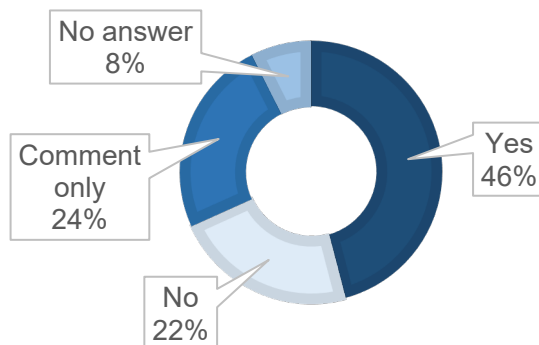
- vehicle age and emissions criteria;
- vehicle livery and signage;
- arrangements for vehicle testing;
- wheelchair accessible vehicles; and,
- first aid kits.

Most Welsh local authorities commented that they agreed that national minimum standards should apply to vehicle licences and went on to set out their views on particular standards.

James Button asked whether it would be made clear that once a vehicle has been licensed, it retains that status at all times, and must therefore only be driven by a licensed driver whatever it is being used for, and must display all prescribed signs and other identification at all times.

Question 6: Operator licence standards

Do you agree with the national minimum standards proposed for an operator's licence?



Responses, numbers

	Total	Passengers	Trade	Licensing	Other
Yes	68	13	36	6	13
No	33	8	20	1	4
Comment only	36	0	8	19	9
No answer	11	0	4	2	5

Responses, percentages

	Total	Passengers	Trade	Licensing	Other
Yes	46%	62%	53%	21%	42%
No	22%	38%	29%	4%	13%
Comment only	24%	0%	12%	68%	29%
No answer	8%	0%	6%	7%	16%

Less than 1/2 of all respondents replied Yes to question 6. But there was significant variation between categories of respondents, with Yes responses from:

- more than 3/5 of passengers;
- more than 1/2 of respondents working in the trade;
- more than 1/5 of respondents with a role in licensing; and,
- more than 2/5 of other respondents.

In total we received 72 comments of which:

- 21 were from respondents who replied Yes;
- 15 were from respondents who replied No; and,
- 36 were from respondents who did not answer Yes or No.

Whether respondents answered Yes, No or only provided a comment, most of the comments were about the appropriateness of particular standards. For example, there were many comments about:

- DBS checks for operator staff;
- policies for passengers with additional needs;
- processes for passenger feedback; and,
- the content and cost of training.

Most Welsh local authorities commented that they agreed that national minimum standards should apply to operator's licences and went on to set out their views on particular standards.

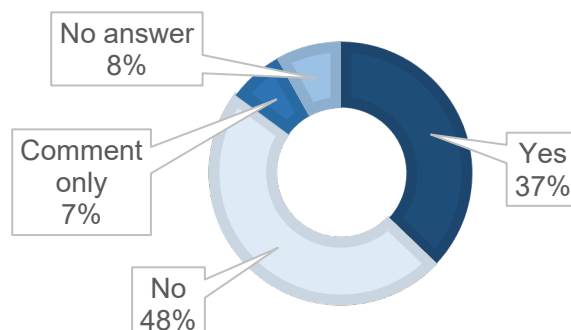
An operator commented that the standards needed to be appropriate for operators of all sizes including 1 person 1 vehicle businesses.

A passenger from Powys proposed that operator's licenses should include additional minimum standards around service level:

“In particular, there should be minimum service levels to ensure that phone lines are manned up to and including half an hour / an hour past the last train/bus arrival in an area, to ensure that passengers on public transport have flexible options to complete their onward journeys. Often in rural areas, operators are reluctant to accept fares past a certain hour - they prioritise the highly lucrative public service contracts with the school runs in the morning and afternoon, but do not then provide a comprehensive service. Bringing service levels into the licensing regime would ensure a consistent service for both people that live here and a warm welcome for people visiting Wales.”

Question 7: Local standards

Beyond the national minimum standards do you think local authorities should have discretion to have additional local standards/requirements for drivers, vehicles and operators in their area? If yes, what do you think these should cover?



Responses, numbers

	Total	Passengers	Trade	Licensing	Other
Yes	55	10	25	5	15
No	71	11	35	19	6
Comment only	10	0	4	2	4
No answer	12	0	4	2	6

Responses, percentages

	Total	Passengers	Trade	Licensing	Other
Yes	37%	48%	37%	18%	48%
No	48%	52%	51%	68%	19%
Comment only	7%	0%	6%	7%	13%
No answer	8%	0%	6%	7%	19%

Almost 1/2 of all respondents replied No to question 7. But there was variation between categories of respondents:

- passengers' responses were fairly evenly divided between Yes and No;
- more than 1/2 of respondents working in the trade replied No;
- more than 2/3 of respondents with a role in licensing replied No; and,
- amongst other respondents, almost 1/2 replied Yes and only 1/5 No.

In total we received 90 comments of which:

- 33 were from respondents who replied Yes;
- 48 were from respondents who replied No; and,
- 9 were from respondents who did not answer Yes or No.

Most respondents who replied No felt that national standards should apply and that local standards would undermine efforts to create a level playing field.

The Licensed Private Hire Car Association commented:

“...make the national standards absolute and high not minimal.”

Most Welsh local authorities endorsed the reply from Directors of Public Protection:

“The Panel feel that as far as possible, standards should be consistent across the whole of Wales to ensure a level playing field within the sector. The Panel therefore feel that Local authorities should not be permitted to set additional local conditions above the national minimum standard for driver and operators.

“The Panel would however suggest that local discretion is retained for livery of vehicles, e.g., Colour policies, back plate and door sign designs. It is considered that attempting to be consistent in this aspect would be an unnecessary cost to the trade.”

Amongst respondents who replied with comments only, there were different views about whether local standards should be allowed. Some of those in favour of local standards suggested that a strong case would need to be made for moving away from the national standards.

The Competition and Markets Authority commented:

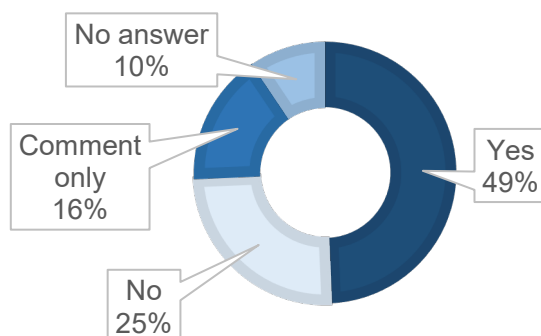
“It is particularly noteworthy that passengers booking via an app generally have access to information such as vehicle model, colour and vehicle registration number, which gives far greater certainty over the vehicle they are entering and the identity of the driver, than depending on livery.”

The Institute of Licensing asked how local standards would be implemented in law and drew attention to some technical challenges.

Respondents who replied Yes tended to comment that discretion to implement local standards was a good thing. Several respondents commented in favour of local standards to ensure sufficient wheelchair accessible vehicles. GMB Union commented that local standards should be monitored to make sure that they do not undermine the national minimum standards.

Question 8: Local licensing administration

Do you agree with our proposals for local licensing administration?



Responses, numbers

	Total	Passengers	Trade	Licensing	Other
Yes	73	14	37	7	15
No	37	7	24	1	5
Comment only	24	0	3	18	3
No answer	14	0	4	2	8

Responses, percentages

	Total	Passengers	Trade	Licensing	Other
Yes	49%	67%	54%	25%	48%
No	25%	33%	35%	4%	16%
Comment only	16%	0%	4%	64%	10%
No answer	10%	0%	6%	7%	26%

Almost 1/2 of all respondents replied Yes to question 8. But there was variation between categories of respondents:

- more than 2/3 of passengers' replied Yes;
- more than 1/2 of respondents working in the trade replied Yes;
- 1/4 of respondents with a role in licensing replied Yes and almost 2/3 replied with comments only; and,
- amongst other respondents, almost 1/2 replied Yes and 1/4 did not answer.

In total we received 66 comments of which:

- 26 were from respondents who replied Yes;
- 16 were from respondents who replied No; and,
- 24 were from respondents who did not answer Yes or No.

Directors of Public Protection and most Welsh local authorities agreed that administrative, decision making and issuing licence functions for taxi and PHVs should continue to be performed by local authorities. Applicants should continue to apply to the local authority where they mainly intend to work. However, local authorities were unclear how the proposals would work in practice where an additional licence is required outside the issuing authority area.

The Institute of Licensing also agreed that taxi and PHV licensing should remain with local authorities. The Institute also noted local authorities' concerns about any suggestion that local authorities should automatically issue a licence because another authority has licensed the individual. The Institute felt this should be subject to further consultation.

James Button agreed that taxi and PHV licensing should remain with local authorities. Mr Button also commented:

“In relation to the assertion that a lower licence fee would be payable for additional drivers' licences in other local authority areas, I do not understand the rationale behind this. The licence fee covers the costs of administration, which will remain reasonably similar in each authority. The additional costs that you suggest would not be required for additional licenses e.g. medical certificates, DBS certificates, should not be charged as part of the licence fee anyway, but as preapplication costs.”

Leonard Cheshire agreed that licensing administration should remain the responsibility of local authorities due to their local knowledge and understanding. Leonard Cheshire, and some other respondents, also called for local authorities to enforce standards effectively. Leonard Cheshire commented:

“We would recommend additional requirements on licensing administrators to ensure effective monitoring and enforcement of national minimum standards. This is particularly important with regard complaints around disability discrimination – an area our research participants highlighted as dissatisfactory. Local authorities should be required to have effective reporting mechanisms and should also undertake proactive monitoring of driver and operator behaviour. Local authorities could also consider conducting mystery shops with disabled people, in which knowledgeable disabled people can provide meaningful feedback to local authorities, taxi/PHV operators and their drivers.”

Veezu Group replied Yes and commented:

“We are concerned with very differing administrative timescales however and there should be clear national guidance on the performance management of the time taken to grant a licence. National Guidance should also make reference to the use of Delegated Powers so that applications which meet the necessary tests

are granted by Officers thereby avoiding the necessity to form a Licensing Committee to determine the application.”

Another operator commented:

“The local licensing office and officers should work to a national standard preferably run by the traffic commissioner. The standard and politics of the Licensing department can be very unprofessional when we are running businesses providing employment, paying monies to local companies and paying for a service from [the] Council.”

Some respondents who replied No suggested that enabling local authorities to deliver licensing services collaboratively as a region would deliver economies of scale.

Some other respondents who replied No suggested it would be more cost effective to administer licences nationally. A few were in favour of a national PHV licence, possibly administered by Transport for Wales.

Some respondents highlighted the variation in licence fees in different parts of Wales. One respondent recommended that, if local licensing administration is to be retained, then a new funding system should be introduced which would set private hire licensing fees nationally. The respondent believed that if cost is not addressed alongside the introduction of national minimum standards then the objective of reducing cross-border hiring would not be achieved.

Unite the Union commented:

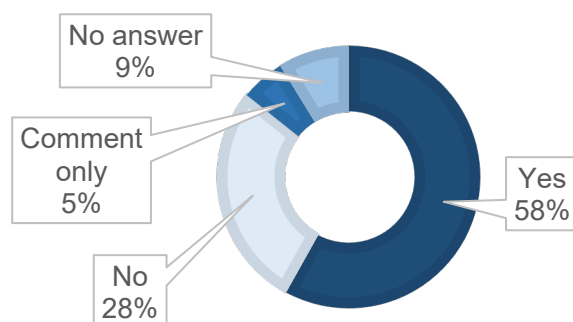
“The suggestion that PHV drivers continue to undertake work anywhere is shortsighted in respect of the current legislation. We believe that it is the larger operators that have distorted the true meaning of the LGMPA³ 1976.

“It has never been tested in court where a vehicle is made available to accept a booking, it has only been deemed that a vehicle may pick up, pass through or drop off in another authority. The position ‘triple lock’ should mean a driver licensed in a local authority may only start or finish a journey in that local authority, however if they find themselves in a different LA, they may only pick up a passenger travelling back to their home LA, or drop off a passenger they picked up in their home LA. They should not undertake any work in that LA whilst they are there, except in the situation described. They must travel back to their home LA before they continue ‘working’.”

³ Local Government (Miscellaneous Provisions) Act

Question 9: Out of area enforcement

Do you agree with our proposal to enable local authority enforcement officers to propose a sanction against a taxi or PHV driver found to be in breach of a national minimum standard while operating in their administrative area but not licenced in their area?



Responses, numbers

	Total	Passengers	Trade	Licensing	Other
Yes	86	15	47	4	20
No	41	6	15	19	1
Comment only	8	0	2	3	3
No answer	13	0	4	2	7

Responses, percentages

	Total	Passengers	Trade	Licensing	Other
Yes	58%	71%	69%	14%	65%
No	28%	29%	22%	68%	3%
Comment only	5%	0%	3%	11%	10%
No answer	9%	0%	6%	7%	23%

More than 1/2 of all respondents replied Yes to question 9. But there was variation between categories of respondents:

- more than 2/3 of passengers replied Yes;
- more than 2/3 of respondents working in the trade replied Yes;
- almost 2/3 of other respondents replied Yes; but,
- more than 2/3 of respondents with a role in licensing replied No.

In total we received 69 comments of which:

- 35 were from respondents who replied Yes;
- 26 were from respondents who replied No; and,
- 8 were from respondents who did not answer Yes or No.

Several respondents who replied Yes, commented that the proposal would enable local authorities to address cross-bordering.

Several respondents commented on potential breaches of national standards that they felt would or would not warrant enforcement action. An operator suggested that national statutory guidelines should be used to specify the sanctions corresponding to violations of national minimum standards. The operator felt that by doing so, equity and transparency would be ensured for drivers, while further facilitating comprehensive and efficient enforcement.

The National Private Hire and Taxi Association supported the proposal but identified legal technicalities which might make implementation challenging.

Barry Greig suggested that Wales might benefit from considering the Civic Government (Scotland) Act 1982 Part 11 Section 21 Offences.

Chwarae Teg commented that:

“...enforcement activities across Wales must be adequately resourced and maintained. The ability of local authority enforcement officers to sanction drivers licenced by another authority cannot create the conditions for some authorities to reduce their enforcement activities in the hope that neighbouring authorities will make up any shortfall in enforcement.”

Many of the comments from respondents who answered No were from local authorities. Directors of Public Protection did not feel that the power was necessary, commenting:

“Local Authority enforcement officers already routinely refer concerns about vehicles to the home licensing authority for follow up action to be taken. This proposal is considered onerous and over complicates informal procedures that are already in place and used between Local Authorities.”

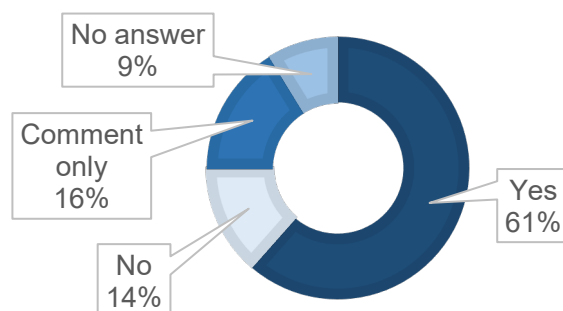
A respondent with a role in licensing commented:

“The recovery of costs is not resolved by this proposal. With no power to stop a vehicle there are limited opportunities to confront other area vehicles unless you have the police with you and they have powers to deal with unsafe vehicles. It should be left to the licensing authority to determine as they will hold the history of the individual.”

The 8 respondents who replied with comments only included the Institute of Licensing and James Button, who highlighted several questions including how the costs of the ‘remote’ authority undertaking such enforcement would be covered, and whether there would be a mechanism whereby the remote authority could challenge the decision of the home authority if no sanction were imposed.

Question 10: Suspension of a licence

Do you agree with our proposal to enable local authority enforcement officers to suspend a licence issued by another authority where there is an immediate risk to public safety?



Responses, numbers

	Total	Passengers	Trade	Licensing	Other
Yes	91	18	48	6	19
No	20	3	13	2	2
Comment only	24	0	3	18	3
No answer	13	0	4	2	7

Responses, percentages

	Total	Passengers	Trade	Licensing	Other
Yes	61%	86%	71%	21%	61%
No	14%	14%	19%	7%	6%
Comment only	16%	0%	4%	64%	10%
No answer	9%	0%	6%	7%	23%

More than 1/2 of all respondents replied Yes to question 10. But there was variation between categories of respondents:

- more than 4/5 of passengers replied Yes;
- more than 2/3 of respondents working in the trade replied Yes;
- more than 3/5 of other respondents replied Yes; but
- almost 2/3 of respondents with a role in licensing replied No.

In total we received 60 comments of which:

- 29 were from respondents who replied Yes;
- 7 were from respondents who replied No; and,
- 24 were from respondents who did not answer Yes or No.

Respondents who replied Yes, often commented on the benefits to passenger safety.

Several respondents who replied Yes commented that 14 days for the acting authority to notify the home authority of a suspension was too long.

Some respondents, including the National Private Hire and Taxi Association, commented on the need to ensure that powers to suspend a licence were used appropriately. Other respondents commented that there should be an appeals process. Leonard Cheshire suggested that:

“Local authorities should be required to have clear criteria for when they can exercise this power, and there should be a right of appeal for drivers who have had their licenses suspended.”

The FSB Wales and the Competition and Markets Authority hoped that the proposal would help to address cross-bordering. The Competition and Markets Authority commented:

“...the ability for local authority enforcement officers to take action against any vehicle operating in their area which is not compliant with national standards, regardless of the licensing authority, should address some concerns over cross-border plying for trade.”

Chwarae Teg suggested that a clear and simple process for passengers to report safety concerns was needed.

Amongst respondents who replied No, several reasons were given. City of Wolverhampton Council felt that the appropriate process for issuing a suspension was for referrals to be made to the home licensing authority.

Other respondents were concerned that the power would be abused. Some felt that immediate risks to public safety were best dealt with by the police. Others asked for clarity on what was meant by an immediate risk to public safety.

Some respondents commented that there was insufficient focus on protecting drivers from aggressive passengers.

The 24 respondents who replied with comments only included the majority of Welsh local authorities. Directors of Public Protection commented that they supported the proposal to enable competent local authority enforcement officers to suspend a licence issued by another authority where there is an immediate risk to public safety. However the Directors raised some concerns about how the process would operate in practice. For example, Directors did not agree with the home local authority having the power to reverse the decision to suspend a vehicle nor the need for a confirmation process, commenting:

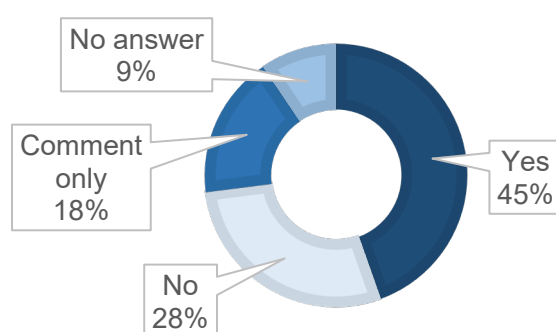
“This surely would give rise to the possibility of unnecessary challenges and court appeals leading to increased burdens and costs to local authorities.”

James Button and the Institute of Licensing raised a number of questions about how the process would work in practice.

Unite the Union suggested that when a suspension is overturned on appeal there must be scope for claiming compensation for loss of earnings from the local authority.

Question 11: Fixed penalty notices

Do you agree that fixed penalty notices (FPNs) should be introduced for certain taxi and PHV offences?



Responses, numbers

	Total	Passengers	Trade	Licensing	Other
Yes	66	10	31	9	16
No	42	11	29	0	2
Comment only	26	0	4	17	5
No answer	14	0	4	2	8

Responses, percentages

	Total	Passengers	Trade	Licensing	Other
Yes	45%	48%	46%	32%	52%
No	28%	52%	43%	0%	6%
Comment only	18%	0%	6%	61%	16%
No answer	9%	0%	6%	7%	26%

Less than 1/2 of all respondents replied Yes to question 11. But there was variation between categories:

- more than 1/2 of passengers replied No;
- amongst respondents working in the trade replies were fairly evenly split between Yes and No;
- 3/5 of respondents with a role in licensing replied with comments only; and,
- More than 1/2 of other respondents replied Yes.

In total we received 77 comments of which:

- 31 were from respondents who replied Yes;
- 20 were from respondents who replied No; and,
- 26 were from respondents who did not answer Yes or No.

Many respondents who replied Yes asked for clarity on the offences that would result in an FPN. Others commented on the type of offences that they felt would be suitable for an FPN.

Some respondents who replied Yes suggested there should be adequate training for drivers, warnings before an FPN was issued and a right of appeal.

Leonard Cheshire felt that FPNs would provide an efficient and effective means of enforcing regulations. Leonard Cheshire also suggested that:

“Alongside the introduction of FPNs should come greater transparency about the complaints process to improve trust among disabled passengers, as well as communicating the reasons for issuing FPNs to local providers themselves and providing guidance on how drivers can avoid committing the offences in the first place, delivering a greater quality of service for all disabled passengers.”

Wales Safer Communities Network supported the proposal and thought there should be guidance on the number of FPNs a driver may receive before further action is taken either through licence or vehicle removal for a fixed or permanent time or that the case will have to go to court.

Ceredigion Green Party felt the proposal provided an opportunity to close a loophole in the law:

“If a private car driver gets 12 points on their licence, they are automatically banned from driving for a period. If a taxi driver gets more than 12 points, they go to court and argue that they should not be banned from driving because they will lose their job. There are some taxi drivers with over 30 penalty points on their licence – and they are still driving!”

The National Private Hire and Taxi Association was strongly against the proposal, reporting it had seen many licensing officers nationwide being overzealous in their demands. The Association, and some other respondents, raised concerns about the implication of local authorities receiving income from FPNs:

“under licensing legislation, the cost of issuing and enforcing the licensing regime must be met at point of application, it cannot be applied pro rata on an individual basis, nor can it be subsidised by other forms of income or cross subsidised from one sector to another, we may think this is unfair, but unless there is a change in legislation to accommodate this, accompanied by a huge drop in licensing fees

since the costs of enforcement would have to be removed entirely from the licensing fees, we simply cannot agree to such a suggestion and would object strongly.”

Many respondents who worked in the trade and replied No were concerned about the potential cost of FPNs. Several commented that the sanctions already available to local authorities and the police were adequate.

Several respondents who replied No commented that if implemented there should be a national policy on the offences that would lead to an FPN and national enforcement processes.

The 26 respondents who replied with comments only included many Welsh local authorities. Most of these endorsed the views of the Directors of Public Protection who commented:

“...the types of infringements set out in the White Paper at Questions 11 (FPN’s) and 12 (penalty points scheme) are of a similar level – minor when considering public safety. The more serious infringements such as refusing a passenger with an assistance dog, inappropriate behaviour etc. would rightfully be dealt with by way of a hearing or legal action. The introduction then of both a FPN scheme and penalty point scheme introduces 3 levels of enforcement action; this is an over complicated and unnecessary enforcement protocol.”

Directors of Public Protection felt that it would be more appropriate to introduce either a penalty points scheme or a FPN scheme for the minor infringements and the option to go straight to a hearing or legal action for the more serious infringements.

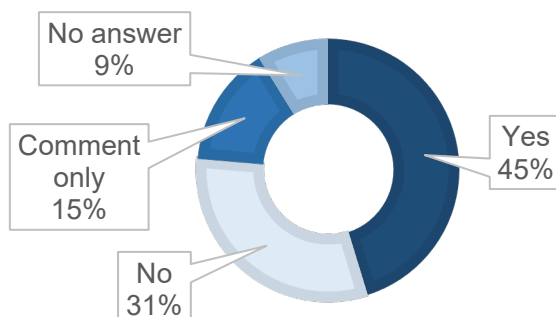
There was not consensus amongst Welsh local authorities on whether FPNs or a national penalty points scheme should be introduced but the majority of Welsh local authorities preferred a national penalty points scheme.

Local authorities who favoured a national penalty points scheme were concerned about the cost of administering an FPN system, including the cost of taking payments, chasing payments, offering reduced payments and options for cases to be tried at court. Also, concerns were raised that income generated from FPNs would need to be considered alongside fee setting arrangements. It was also felt that enforcement officers would be much less likely to issue a FPN for minor infringements than to issue penalty points.

James Button and the Institute of Licensing raised a number of questions about how the use of FPNs would work in practice. The Institute commented that if FPNs were to be implemented then detailed guidance would be needed alongside clear processes.

Question 12: National penalty points scheme

Do you agree that a national penalty points scheme should be introduced for certain taxi and PHV infringements?



Responses, numbers

	Total	Passengers	Trade	Licensing	Other
Yes	67	11	32	5	19
No	46	10	28	5	3
Comment only	22	0	4	16	2
No answer	13	0	4	2	7

Responses, percentages

	Total	Passengers	Trade	Licensing	Other
Yes	45%	52%	47%	18%	61%
No	31%	48%	41%	18%	10%
Comment only	15%	0%	6%	57%	6%
No answer	9%	0%	6%	7%	23%

Less than 1/2 of all respondents replied Yes to question 12. But there was variation between categories:

- more than 1/2 of passengers replied Yes;
- less than 1/2 of respondents working in the trade replied Yes;
- almost 3/5 of respondents with a role in licensing replied with comments only; and,
- more than 1/2 of other respondents replied Yes.

In total we received 66 comments of which:

- 28 were from respondents who replied Yes;
- 16 were from respondents who replied No; and,
- 22 were from respondents who did not answer Yes or No.

Many respondents who replied Yes asked for more detail about how a national penalty points scheme would operate, including clarity on:

- the infringements that would lead to penalty points being issued;
- the number of points for each infringement;
- the number of points at which further sanctions would be considered;
- how points would be awarded for infringements outside of the home authority; and,
- the resource implications of operating such a scheme.

Some respondents who replied Yes gave their views on the suitability of penalty points for particular infringements. Others suggested there should be an appropriate appeals process.

The Independent Training and Testing Company commented that a national penalty points scheme would need to be rigorously trialled and tested before being rolled out.

Amongst respondents who replied No, several commented that each case should be considered on its own merits and that a points scheme would remove the level of individual scrutiny required. Other respondents wished to see more detail about how the scheme would operate. Some respondents felt that the sanctions already available to local authorities and the police were adequate.

The Licensed Private Hire Car Association had found that similar schemes had been inconsistent and somewhat subjective in their application, even within the same licensing authority. The Association was not in favour of a penalty points scheme but suggested that if one were to be introduced then great care should be taken in setting the criteria and scope.

As discussed above, many Welsh local authorities favoured a national penalty points scheme over the introduction of FPNs. The Directors of Public Protection commented:

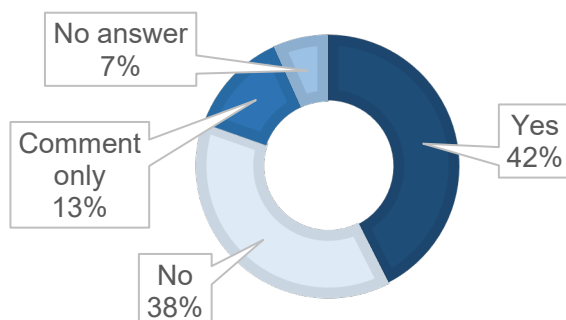
“...any penalty points scheme introduced must be consistently applied across Wales. The infringements and the number of penalty points given should be clearly set out in a national policy and should be for criteria which is not subjective e.g., not having a driver badge or door stickers displayed will incur points, but a dirty vehicle would not.”

Welsh local authorities who were not in favour of a penalty points scheme raised concerns about the additional administrative burden and the need to use another recording system. These local authorities reported that penalty point schemes had been found to be overly bureaucratic, often with Councillor and legal involvement which was not easy to manage.

James Button and the Institute of Licensing raised a number of questions about how the use of penalty points would work in practice.

Question 13: Cancelled bookings

Do you think that there is a need to address the negative consequences of ‘multi-apping’? If yes, which option, including any suggestions of your own, do you think would be most effective. Please provide comments.



Responses, numbers

	Total	Passengers	Trade	Licensing	Other
Yes	63	9	24	18	12
No	56	12	36	1	7
Comment only	19	0	5	7	7
No answer	10	0	3	2	5

Responses, percentages

	Total	Passengers	Trade	Licensing	Other
Yes	42%	43%	35%	64%	39%
No	38%	57%	53%	4%	23%
Comment only	13%	0%	7%	25%	23%
No answer	7%	0%	4%	7%	16%

Less than 1/2 of respondents replied Yes to question 13. There was more support from licensing officers than from other categories of respondents:

- more than 1/2 of passengers replied No;
- more than 1/2 of respondents working in the trade replied No;
- almost 2/3 of respondents with a role in licensing replied Yes; and,
- amongst other respondents almost 2/5 replied Yes and more than 1/5 replied No.

In total we received 85 comments of which:

- 43 were from respondents who replied Yes;
- 23 were from respondents who replied No; and,
- 19 were from respondents who did not answer Yes or No.

Several respondents pointed out that booking apps are not widely available outside urban areas and consequently multi-apping is not a problem in large parts of Wales. Local authorities reported that cancellations are only problematic in a few parts of the country. However, many respondents were concerned about the consequences of cancellations including inconvenience and the risk to passenger safety.

The Licensed Private Hire Car Association commented:

“It is our considered view this is now a very serious public safety issue facing passengers who pre-book taxis and PHVs. Passengers are being stranded, which for the vulnerable is dangerous, for business users can be catastrophically damaging, for people missing hospital appointments, possibly life-threatening and at best considerably inconvenient and stressful.

“For the sake of clarity, in the main bookings are not being cancelled, which indicates there is a reasonable process in place for managing cancellations, rather journeys are simply not being fulfilled after acceptance by a driver. This is largely because the driver has subsequently accepted a second journey and, without necessarily notifying the operator or passenger, abandons the first journey leaving it unfulfilled.

“For the above reason, we believe this is a non-fulfilment of a journey by a driver, rather than a booking cancellation, which occurs due to reasons usually beyond the control of an operator or passenger.”

Cardiff Council commented:

“There is some anecdotal evidence of the direct negative consequences of drivers ‘multi-apping’ and as such the Council would welcome further research / consultation on this issue.

“It is acknowledged that drivers using multiple apps simultaneously could cause confusion to the public, especially if a vehicle has the livery of another operator when collecting passengers for a booking. However, the issue of drivers cancelling bookings that were previously accepted as the sole consequence of multi-apping is unclear and we would welcome further consultation as to the reasons why bookings may be cancelled. Such consultation would also allow further consideration of any unintended consequences of restricting competition in local markets.

There was some support for both option 1⁴ and option 2⁵ but also some concerns about the legality of each option and the effects on operators and drivers respectively. The Licensed Private Hire Car Association (LPHCA) commented:

“The LPHCA is not against drivers working for multiple operators, all self-employed drivers have that right and it has been accepted trade practice since well before Apps were available, especially in the chauffeur and executive marketplace.

“Option 1 of your proposed options is, we submit, unsuitable because it is the self-employed driver who is failing to fulfil a contracted obligation, by abandoning the journey, not the operator. Such an unfettered regulatory expectation, as proposed, risks unfairly making operators culpable for the unforeseeable decisions of drivers,

“Option 2 of your proposed options is, we submit, unsuitable because self-employed drivers have always had, and should continue to have, the freedom to engage with multiple operators. To do otherwise is potentially restrictive for the wider trade and, in the interests of passengers, detrimental to market competition.

“Alternatively, the LPHCA wishes to propose a third option, which we have discussed at length with member operators, that would potentially reduce non-fulfilment and the stranding of passengers – ‘Compellability’.

“Compellability is an established part of the regulatory framework for taxis, under section 53 Town Police Clauses Act 1847, and could be easily introduced for PHV drivers.

“In simple terms, once a PHV driver accepts a journey, a duty is placed on the driver to fulfil that journey or risk, in the absence of a reasonable excuse, committing an offence. This would, we believe, represent an appropriately targeted and effective deterrent.”

The Competition and Markets Authority commented:

“Multi-apping facilitates new entry and expansion as drivers are able to work for more than one operator. We are concerned that any restrictions on multi-apping may reduce choice for users of a given app

⁴ Option 1: Holding operators to account for cancelled bookings. Local authorities grant licences to operators in the expectation that they will fulfil the passenger bookings that they accept. We may wish to work with local authorities to take action against operators whose service falls below an agreed level.

⁵ Option 2: Limiting drivers’ freedom to use more than one app at once. For example, by requiring each vehicle to display the name of one company the driver will be accepting bookings through. Leeds City Council have a vehicle condition requiring the operator name to be written on the vehicle.

or operator, possibly leading to the entrenchment of incumbent operators' positions.

"We advise the Welsh Government that any restriction of drivers' freedom to choose an operator needs to be done with care and should first explore the feasibility of alternative interventions such as restricting a driver's ability to decline an accepted booking beyond a certain number of minutes after a booking is made. This could include a requirement on operators to share details of cancelled bookings which will provide greater clarity on the extent to which repeated cancellations occurs in practice and across operators/platforms."

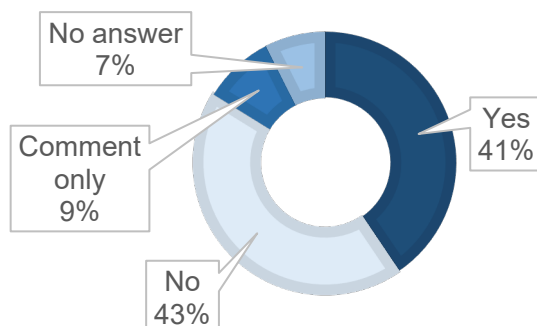
A passenger from Powys suggested that a "Made in Wales" transport app should be developed to integrate the public transport offer including private hire vehicles. The respondent felt that such an app would help passengers, especially in rural areas, and redirect revenue from multinational companies outside Wales to local providers.

Several respondents noted that multiple bookings and cancellations by passengers are a source of frustration and lost revenue for the trade. Cardiff Council commented:

"The Council would support the practices of some operators where customers cancel a booking that is already dispatched and on way to levy a penalty charge to that customer."

Question 14: Cross-border hire – England and Wales

Do you agree that option A is the best means to address concerns about cross-border hire between Wales and England?



Responses, numbers

	Total	Passengers	Trade	Licensing	Other
Yes	60	11	33	3	13
No	64	10	27	21	6
Comment only	13	0	5	3	5
No answer	11	0	3	1	7

Responses, percentages

	Total	Passengers	Trade	Licensing	Other
Yes	41%	52%	49%	11%	42%
No	43%	48%	40%	75%	19%
Comment only	9%	0%	7%	11%	16%
No answer	7%	0%	4%	4%	23%

More respondents replied No than Yes to question 14. But there was variation between categories of respondents:

- amongst passengers there was almost an even split between No and Yes replies;
- almost 1/2 of respondents working in the trade replied Yes and 2/5 replied No;
- 3/4 of respondents with a role in licensing replied No; and,
- amongst other respondents more than 2/5 replied Yes and almost 1/5 replied No.

In total we received 75 comments of which:

- 23 were from respondents who replied Yes;
- 39 were from respondents who replied No; and,
- 13 were from respondents who did not answer Yes or No.

Several respondents commented that cross-bordering between England and Wales was not happening at a level that should be considered problematic. One respondent commented that they understood there were concerns that introducing national minimum standards would result in more Welsh drivers seeking to be licensed in England. However, they did not believe this would be the case since there are already licensing authorities in England with fewer requirements and lower costs that Welsh drivers could be licensed with. They were not aware of significant numbers of Welsh drivers choosing this option.

The Licensed Private Hire Car Association commented:

“We do not believe that option A or Option B are viable solutions to a problem that may be minimal if you have high absolute national standards.

“We feel the concerns that PHV drivers look to obtain licences in parts of England (where standards may be lower) is a major misconception. We know from members that it is the dire waiting time and levels of licensing efficiency that are the main reasons why operators get their drivers licensed away from their home local authority. Some members have moved for this primary reason. Another reason is cost, as there are great disparities in licensing fees.

“High absolute national standards should make for consistency of costs across Wales and making cross-border regulations could cause chaos for those closest to the border in our view.”

Many of those who answered Yes to question 14, i.e. those in favour of option A⁶, stressed the importance of allowing some flexibility to work both sides of the border. For example, for an operator licenced by an English local authority to be able to provide school transport in Wales.

Several respondents who answered in favour of option A nonetheless questioned how it would be enforced.

Some respondents who answered No to question 14, i.e. those not in favour of option A, also commented that option A would not be enforceable.

City of Wolverhampton Council commented:

“Trying to determine if bookings are mainly in Wales would be unenforceable and the policy breaches the “right to roam” under s 75 LGMPA 1976.”⁷

⁶ Option A: To introduce a legislative requirement that PHV operators/drivers/vehicles who undertake bookings wholly or mainly in Wales must be licensed in Wales and therefore meet the Welsh national minimum standards.

⁷ This section states the Act shall not apply to a vehicle bringing passengers into a controlled district in pursuance of a contract for the hire of a vehicle if the vehicle is not made available for hire within the district.

Directors of Public Protection commented:

“The Panel feel that Option A is unworkable in practice and more importantly unenforceable. Using terms like ‘mainly’ are not clearly defined or understood for example, if the Chester PHV works every weekend in Wales but works in Chester throughout the week, they will mostly be working in England.

“Option A would not adequately prevent vehicles licensed in an English Authority working ‘mainly’ in Wales and what sanctions would be available to Welsh Authority enforcement staff to adequately prevent this from continuing. To obtain enough evidence to achieve a positive prosecution would be extremely unlikely. The Panel feel that implementing Option A would potentially result in a significant increase in the number of English licensed vehicles operating in Wales.”

An operator commented that option B⁸ could be very limiting, for example, preventing a customer who required a particular type of vehicle from getting what they wanted.

Another respondent questioned whether option B could be progressed both with respect to the Deregulation Act 2015 and from a practical perspective, as Welsh authorities would be reliant on English authorities to take enforcement action against English-licensed drivers working in Wales. This would require English authorities to willingly change their licensing policies and enforcement practices.

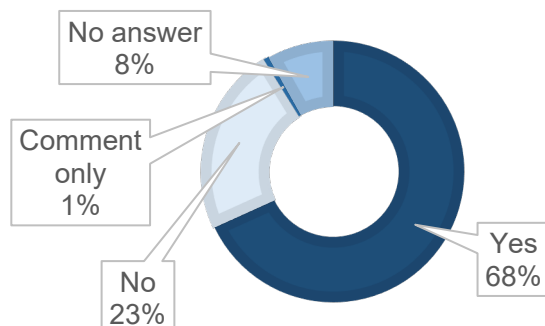
Directors of Public Protection suggested that option B, although preferable, was too restrictive for those operators located on the England/Wales border. Therefore, Directors of Public Protection suggested a modified option B with exemptions to allow cross-bordering in specific instances. Directors of Public protection referred to this option as option C.

Some stakeholders who were aware of option C also supported it. These included some but not all Welsh local authorities. The Institute of Licensing and the Local Government Association suggested there was merit in considering option C.

⁸ Option B: To introduce a legislative requirement that any PHV journey that starts and ends in Wales must be undertaken by a driver, vehicle and operator licensed in Wales, who must therefore meet the Welsh national minimum standards.

Question 15: Information sharing

Do you agree that use of the NR3 register in the driver licensing process should be mandatory in Wales?



Responses, numbers

	Total	Passengers	Trade	Licensing	Other
Yes	101	15	42	26	18
No	34	6	22	1	5
Comment only	1	0	0	0	1
No answer	12	0	4	1	7

Responses, percentages

	Total	Passengers	Trade	Licensing	Other
Yes	68%	71%	62%	93%	58%
No	23%	29%	32%	4%	16%
Comment only	1%	0%	0%	0%	3%
No answer	8%	0%	6%	4%	23%

More than 2/3 of respondents replied Yes to question 15. All categories of respondents supported the proposal but support was strongest from respondents with a role in licensing.

In total we received 53 comments of which:

- 49 were from respondents who replied Yes;
- 3 were from respondents who replied No; and,
- 1 was from a respondent who did not answer Yes or No.

There was strong support from Welsh local authorities, individual passengers and organisations that represent passengers. Amongst comments received from respondents who answered Yes to question 15 were the following:

Wales Safer Communities Network commented:

“This would appear a sensible approach but the cost of being part of the NR3 register should be monitored to ensure that it is giving value for money and also delivering what is needed to safeguard passengers and potential passengers in Wales.”

Chwarae Teg suggested that Welsh Government should explore the creation of a register of complaints to ensure that enforcement authorities are fully aware of a driver’s record and to maintain faith in the licensing system.

Veezu Group commented:

“It is also important to set a performance standard for Local Authorities in the same way that they are on PH Operators for reporting matters. 72 hours does not seem unreasonable.”

Another operator commented:

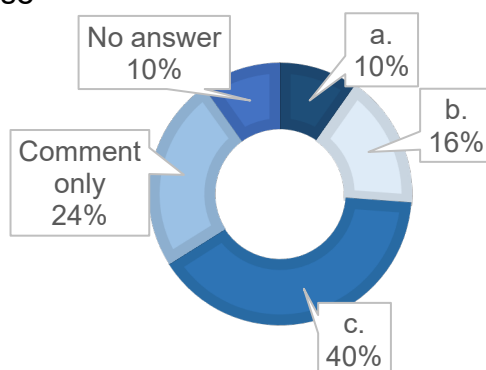
“If there was a national licence in place, this would simplify the process and reduce the need (and significant time and cost) of processing this data between LAs. It is crazy there is no proposal for a national licence to drive PHVs.”

Of the 34 respondents who answered No to question 15, only 3 provided comments and none of these included a strong argument against the mandatory use of NR3.

Question 16: Zero Emission Vehicles

Do you think that Welsh Ministers should take action to accelerate the transition to ZEV taxis/PHVs? If yes, which of the following options would you prefer?

- set a deadline for all taxis and PHVs to be zero emission at the tailpipe
- set an age limit for vehicles which are not ZEV
- do something else



Responses, numbers

	Total	Passengers	Trade	Licensing	Other
a. Set a deadline	15	4	7	0	4
b. Set an age limit	25	5	16	2	2
c. Something else	61	12	37	4	8
Comment only	37	1	6	20	10
No answer	15	1	4	2	8

Responses, percentages

	Total	Passengers	Trade	Licensing	Other
a. Set a deadline	10%	17%	10%	0%	13%
b. Set an age limit	16%	22%	23%	7%	6%
c. Something else	40%	52%	53%	14%	25%
Comment only	24%	4%	9%	71%	31%
No answer	10%	4%	6%	7%	25%

1/4 of respondents were in favour of setting either a deadline or an age limit to accelerate the transition to ZEV taxis/PHVs. 2/5 of respondents were in favour of other action and almost 1/4 replied with a comment only.

In total we received 97 comments of which:

- 6 were from respondents who replied a;
- 9 were from respondents who replied b;
- 45 were from respondents who replied c; and,
- 37 were from respondents who did not answer Yes or No.

Comments from respondents who favoured option a (a deadline for all taxis and PHVs to be zero emission at the tailpipe) were in support of action to accelerate the transition to ZEV taxis/PHVs.

Ceredigion Green Party commented:

“You can combine options a) & b). For example you set 2030 as the deadline in section a) and 6 years as the limit in section b). But you allow all petrol and diesel vehicles purchased between 2025 and 2030 to carry on being used until they have completed 6 years of service.”

Someone who works in the trade in Cardiff commented:

“I have been in zero emissions since 2019. Every taxi should be, they contribute the most to CO2 emissions in town.”

Electric Vehicle Association (EVA) Cymru commented:

“EVA Cymru fully supports the recognition made in the consultation document that decarbonising taxis and Private Hire Vehicles is essential to achieving Wales’ net zero targets. The opportunity to remove a high level of polluting miles from some of our most congested areas is one that cannot be underestimated.

“Electric Vehicles provide a viable and cost effective option today and many operators recognise the benefits of moving away from petrol and diesel. As a result, removing barriers and supporting faster transition will help all operators to achieve the objective of a fully zero emission taxi and PHV fleet in Wales.”

Several respondents who favoured option b (an age limit for vehicles which are not ZEV) commented that it would allow for a more gradual transition.

The National Private Hire and Taxi Association commented:

“By introducing an age limit, there will be time allowed to not only migrate across to lower emission vehicles, but also for a second hand market to develop, for battery capacities to improve allowing for longer mileage ranges which means less frequent stops to recharge, and allows for the recharging infrastructure to develop.

“The automotive industry and the taxi and private hire industry is making huge steps in the right direction to accommodate such a change towards EV's, but we simply must have more time for those measures to be tried and tested, rolled out and create a far more sustainable migration to ZEV.”

An operator commented that a gradual transition period is needed as many licensed vehicles do not currently meet the requirement. The operator also reported that its drivers had expressed a strong preference for option b, noting that many drivers may have invested in petrol or diesel vehicles either through purchase or long-term lease.

Many respondents who favoured option c (do something else), or who provided comments only, expressed concerns about:

- the high purchase price of ZEV compared to petrol and diesel vehicles;
- the absence of a significant second-hand market for ZEV;
- whether the range of ZEV was adequate for taxis and PHVs which typically do high mileage each day;
- the availability of charging infrastructure, particularly fast chargers for the high proportion of drivers who would not be able to charge a ZEV at home;
- the down time that charging would cause; and;
- unreliable battery life.

The cost of transitioning to ZEV was a concern for many respondents with comments such as:

“I think zero emissions vehicles shouldn’t be compulsory. That could put huge financial strain on small business and individual taxi drivers. And it will provide big business opportunities to wipe out small business.”

“Forcing drivers to change their vehicles to ZEV to soon will result in a lot of drivers giving up the profession”

FSB Wales commented:

“Welsh Ministers should take action, but this should also be supportive of transition for SMEs, not merely punitive. As such, any deadline must also consider the costs and timeline of leasing for any fleets. It is also important that any such action does not reduce service levels to the extent where more people are incentivised to use their cars rather than taxis/PHV, as this is in the end a bigger problem in terms of congestion and emissions.”

Unite the Union said it did not support legislation on this matter now as it was not consistent with a fair and just transition. Unite suggested it should be considered as a separate matter when the technology has reached a point where a valid discussion can be had on the subject. Unite presented running costs for ZEV which it said demonstrated that the greener option is not currently a viable option for drivers on low incomes.

Licensed Private Hire Car Association (LPHCA) said that the setting of arbitrary aspirations and timelines has been shown to be flawed in light of the pandemic and the war in Ukraine. The war was said to have caused massive increases in the cost

of electricity, lack of chips and other parts, battery production factory closures and massive costs, not envisaged just a few years ago:

“LPHCA fleets are in some cases keeping older vehicles longer, because there simply isn’t any way of knowing battery life or the cost of replacing batteries. When these unknowns are quantified and the market has far more affordable vehicles, transition to Net Zero will be more realistic.

“Electricity costs have soared well above other vehicle fuel costs and prior to the pandemic our members were reporting that it was dearer. With as many as nine out of ten Taxi and PHV drivers unable to charge at home on far lower tariffs, whilst taxis can charge on ranks, PHV drivers would need to charge on street, and not earn whilst doing so, this will cause further supply problems and increased fares. You rightly point out that Taxis/PHVs are important to communities with low levels of car ownership, we would add they also reduce it. It should also be remembered that the most vulnerable are amongst those unable to own or utilise a car.”

Some people who work in the trade reported that they knew colleagues who had tried ZEV and switched back to petrol or diesel vehicles:

“I spoke to a driver friend who had electric, he said it's been the worst 9 months of his life and now changed to hybrid.”

Several respondents commented that transitioning to ZEV would be more challenging in rural areas:

“Consideration needs to be given to different situations in different areas. Transition to ZEV Taxis in urban areas, for vehicles operating mainly in those areas, - yes. But rural Wales needs more flexibility in this transition. The rules must consider that Hybrid or even Hydrogen powered vehicles will be a more realistic option for some operators in the future, and allow them to continue using older vehicles until such options are realistic.”

FSB Wales Commented:

“...the pollutions and social costs can be higher in some areas than others, and so the benefits of more PHVs in (say) rural areas better outweigh the benefits. It is also the case that how this operates may be dealt with in other ways (e.g., Cardiff Congestion Charging after 2027) and may not be dependent on the deadline. Realistically, some areas will be better served by charging points than others, and so it is possible that a deadline appropriate for one area may not be so for another.”

Some respondents identified challenges in relation to zero emission wheelchair accessible vehicles. Leonard Cheshire believed that any ZEV policy should take account of the availability of wheelchair accessible vehicles both now and in the future. A timely decision would ensure that drivers and operators have clarity and will avoid the unintended consequence of drivers delaying purchase of wheelchair accessible vehicles.

The Older People's Commissioner suggested that any action taken should not mean a reduction in wheelchair accessible vehicles due to cost.

National Private Hire and Taxi Association commented:

"With regards to wheelchair accessible vehicles, there is currently only one available, which is in excess of £70k in most cases, the weight of EV batteries already reaching the maximum axle weight of vehicles, and creating no drill zones in the vehicle floor, are all factors which limit the availability of WAV conversions."

Guide Dogs Cymru commented on the importance of on-board acoustic sound generating equipment on all taxis and PHVs:

"Electric vehicles are almost silent and it is very difficult for a vision impaired passenger to hear them as they pull up at the kerb. "

Many respondents, regardless of which option they favoured, commented that support for a transition to ZEV would be needed.

"If the Welsh government intends to be zero emissions at tailpipe then substantial funding must be made available for drivers to upgrade to zero emission vehicles"

"In addition to increasing this burden for taxi companies though, thought should also be given to how to make this transition easier for them. Charging infrastructure needs careful consideration, and the Welsh Government should give consideration to how this transition will be implemented with charging infrastructure e.g. at taxi ranks and modal hubs. Special consideration should also be given to how Zero Emission mobility will be implemented in rural areas - there are intrinsic challenges given the greater range required and greater distance. Whilst service level standards and ZEVs are desirable, the economics of operating services in sparsely populated areas is already marginal and this cost will be passed on to the consumer. Thought needs to be given as to how to equitably provide mobility in these communities whilst also encouraging the transition to net zero."

"Make hiring these taxis affordable. Have a fleet available to hire by the hour."

Electric Vehicle Association (EVA) Cymru commented:

“We believe that a suite of interventions is required to support the transition, including legislating to prohibit petrol and diesel vehicles, consisting of:

“- A support scheme to overcome the initial capital outlay for replacing existing vehicles (either grant or loan) where the existing petrol or diesel vehicle is removed from the market (i.e. a ‘scrappage scheme’)

“- A focus on ensuring any clean air zones or similar schemes mandate compliance from taxis/PHVs

“- Investment in infrastructure, particularly charging infrastructure dedicated for taxis/PHVs

“- Mandating public sector contracts for taxi/PHVs require zero emission journeys

“- The potential of a ‘pollution uplift’ on journeys taken in Wales using petrol and diesel vehicles (including hybrids)

“- Clarity of messaging on the requirement to transition and on the benefits to the public, helping to inform customer choice (for example green coloured taxi roof lights to show journeys will be zero emission)

“- An overall deadline, set well in advance of the UK Petrol and Diesel ban

“- Earlier deadlines for prohibiting polluting taxis/PHVs from key areas (poor air quality areas, schools, hospitals)”

“In this context we strongly prefer Option A as it recognises the requirement to remove all emissions and will encourage operators to switch at the earliest possibility. However the deadline must, in consultation with the industry, be set at the earliest possible point.”

Some respondents suggested other options which they saw as achievable intermediate steps. These included:

- a ban on diesel taxis/PHVs;
- mandating at least euro 6 emissions standards for taxis/PHVs;
- allowing near ZEV taxis/PHVs such as hybrids; and,
- allowing the use of Hydrotreated Vegetable Oil (HVO)/Biofuel.

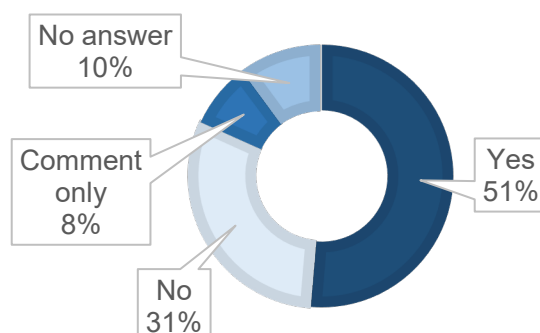
The Licensed Private Hire Car Association suggested that a far better option would be to work towards the need to be working in Zero Emission mode rather than mandating total ZEV:

“Hybrid, particularly self-charging hybrid vehicles, that are Zero Emission Capable (ZEC), with realistic ZEC requirements will enable a smoother transition to Net Zero. You also rightly point out that Taxis and PHVs often operate in urban environments with poor air quality, so switching these vehicles to ZEC would be beneficial.”

An operator suggested that significant carbon and public expenditure savings could be achieved by organising local authority school and social care transport more efficiently. He argued that this should be done before mandating ZEV in the trade.

Question 17: Class B licences for other types of vehicle

Do you agree with our proposals for Class B vehicles?



Responses, numbers

	Total	Passengers	Trade	Licensing	Other
Yes	76	13	31	24	8
No	45	8	26	0	11
Comment only	12	0	6	2	4
No answer	15	0	5	2	8

Responses, percentages

	Total	Passengers	Trade	Licensing	Other
Yes	51%	62%	46%	86%	26%
No	31%	38%	38%	0%	35%
Comment only	8%	0%	9%	7%	13%
No answer	10%	0%	7%	7%	26%

More than 1/2 of respondents replied Yes to question 17. But there was variation between categories of respondents:

- more than 3/5 of passengers replied Yes;
- less than 1/2 of respondents working in the trade replied Yes;
- more than 4/5 of respondents with a role in licensing replied Yes; and,
- amongst other respondents more than 1/3 replied No and 1/4 replied Yes.

In total we received 54 comments of which:

- 30 were from respondents who replied Yes;
- 12 were from respondents who replied No; and,
- 12 were from respondents who did not answer Yes or No.

Many of the comments from respondents who answered Yes were from local authorities who suggested the term “specialist vehicles” rather than class B. Local authorities also suggested that minibuses be added to the list of vehicles.

Wales Safer Communities Network potentially agreed, but would like to see more detail about some of the use of the vehicles, such as school transport:

“...we would want to ensure that both the vehicles and the drivers were suitable for the safeguarding of either a child or children on a regular basis. If there are regular drivers then the risk for exploitation or abuse increases as the driver has the opportunity to build up a rapport with the passenger(s).”

Someone who had worked in the trade told us he supported the proposal because:

“One of the things I've looked at is buying a 16-seater minibus and removing the rear seats to bring it down to 8 seats. The additional space would then have cycle straps in to hold 6 cycles. I could then operate 'taxibus' trips to local cyclists etc. But because the vehicle is not a 'standard' 8 seater the local authority said they would not be able to plate it and I would have to get it plated with the Department of Transport.

“Allowing 'non-standard' vehicles to be plated could offer up lots more opportunities for drivers to diversify and provide specialist services to the public.”

A tourism operator commented:

“The "B" class licence system is a good idea for specialist businesses who carry passengers - for example Driver - Guide services, Limousine / chauffeur services, wedding cars, VIP etc, use of classic cars for such services etc.

“It must be considered that such a vehicle must be able to carry out some Private Hire "type" work such as airport collection or transferring tourists from one area to another, out of area.

“But Community / school transport needs local regulation. Non motorised vehicles and horse drawn vehicles need a completely different system.”

Some other respondents who answered Yes wanted to be reassured that appropriate standards would apply to class B vehicles and their drivers and operators.

The National Private Hire and Taxi Association was amongst respondents who answered No. The Association was concerned that the proposal would cause more work for licensing authorities and confusion for the trade and passengers:

“If a vehicle is to be used for hire and reward, whether that be hackney carriage or private hire (prebooked only) then it should satisfy conditions set out for those vehicles.

“Whilst we agree that there should be an allowance made for such vehicles to become licensed, the fact remains that they must be licensed accordingly and follow the same licensing conditions, for example, horse and carriage, tourism, and tuk tuks, rickshaws etc, are hackney carriage (taxi) by the very definition in the way they are obtained (hailed on demand) whereas limosines, vehicles used for VIP/exec hire, classic and speciality cars, and those used for community and school transport are private hire in so much as they must be prebooked.

“There is already provision in place for such vehicles to be exempt from certain licensing conditions such as minimum seating and head room restrictions, or for the exemption from displaying livery for limosines etc, without giving them a completely separate license type, this suggestion just seems to be creating more work for licensing authorities, and more opportunity for confusion within not only the industry, but the travelling public too.”

Other respondents who answered No were concerned that class B vehicles and their drivers and operators would be exempt from the standards.

The Electric Vehicle Association Cymru commented:

“Whilst we understand the objective within the proposals, we would suggest that a blanket exemption from the standards would undermine the overall aims of the bill.”

Chwarae Teg commented:

“While we understand the rationale behind establishing a different class of vehicles, we want to ensure that the safety of passengers is not compromised or undermined by having a different class of vehicles.

“Drivers and operators of Class B vehicles should still be required to comply with key aspects of the national minimum standards as it relates to safeguarding, accessibility, VAWDASV and the safety of passengers more generally.”

Unite the Union was concerned that class B vehicles licensed to lower standards, such as TukTuks, would have an unfair advantage in competition with taxis and PHVs.

Other respondents suggested that the cost of licensing a TukTuk or pedicab would be prohibitive.

James Button and the Institute of Licensing raised a number of questions about the proposal and commented:

“There are certainly good arguments for certain types of vehicle to be licensed in either a different way, or for certain requirements placed on mainstream taxi and PHV vehicle and driver licences to be relaxed. However, classifying this eclectic range of vehicles and activities together in one “class B” does not necessarily seem to be the best approach.”

Veezu Group expressed concerns that standards of vehicle design and the regulatory training of Class B drivers/riders would be diluted. It drew attention to recommendations of the Law Commission in relation to novelty vehicles and limousines.

Several respondents suggested that it would not be appropriate for some of the vehicles listed to be available for there and then hire.

Questions 18 & 19: Regulatory Impact Assessment

Question 18: Do you have any comments on the draft Regulatory Impact Assessment published alongside this paper?

Directors of Public Protection took issue with a statement in the RIA that local authorities had not decided to implement a voluntary policy that the Welsh Government had recommended in 2021, and had instead retained localised policies. Directors felt that this statement was “fundamentally incorrect”, as:

“changing policies within Local Authorities can be a long and complex process with the need for consultation and political input. It was therefore agreed that the Panel would need to wait for the White Paper to be published before any further work on voluntarily pursuing consistent policies would be undertaken.”

Directors of Public Protection also provided an annex which provided more detailed comments on the potential costs.

Chwarae Teg criticised the RIA for having:

“no substantive engagement with the needs of women or others with protected characteristics”

While the Older People's Commissioner for Wales felt the RIA should be expanded to include an assessment of the potential increase in use of taxis to access healthcare appointments following the ending of the Bus Emergency Scheme in July 2023.

Leonard Cheshire and Barry Greig voiced their support for the RIA's Option 3, 'Do Something', arguing that improvements needed to be made in the sector.

Question 19: Is there any data that you would be willing to provide to help in the development of this RIA?

The Older People's Commissioner provided statistics on older people's attitudes towards public transport, and how these could impact the taxi and PHV sector. Leonard Cheshire stated that it had commissioned UK polling on the experience of taxi/PHV use among disabled passengers, and would be happy to share the breakdown of the responses within Wales.

Several trade representatives stated they would be open to sharing data, including the Licensed Private Hire Car Association, Wrexham Chauffers Ltd., Veezu Group, and the Independent Training and Testing Company.

Questions 20 & 21: Effects on the Welsh language

Question 20: We would like to know your views on the effects that the proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Local authorities highlighted the importance of applicants being able to apply for a license in either Welsh or English. Torfaen Council suggested that considerations should be given to basic Welsh language training for drivers which could form part of any training proposed in relation to national minimum standards. The Older People's Commissioner advocated that:

“any change in the regulations of taxis and PHVs increases the opportunity for people to receive services through the language of their choice as far as possible.”

Some passenger and trade representatives felt that the legislation would have no impact on the Welsh language, with others feeling unable to answer the question due to not being Welsh speakers. Many in the 'other' category did not provide further comments as language rights were not their area of expertise. Several trade

representatives expressed interest in basic language training, but felt that this should be encouraged not mandated, and should be particularly focussed on areas with a higher Welsh-speaking population. Veezu Group stated that it could be possible to offer its app services bilingually, but that smaller operators would struggle to offer bilingual services.

Question 21: Please also explain how you believe the proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Local authorities felt that a positive step would be providing signage in bilingual format on all taxis and taxi ranks, as well as offering Welsh speaking drivers the opportunity to display a 'Siaradwr Cymraeg' sticker on their vehicle and on their badge. One trade respondent suggested that a list of common Welsh phrases could be placed in taxis to encourage engagement with the language, while another called for all drivers and operators to be given access to tutoring in basic Welsh.

Question 22: Other Issues

Are there any other issues you would like to raise about taxi and PHV licensing?

Respondents raised a wide range of issues. Some of the most significant are described below:

- Jim Button expressed concern that amending the existing legislation would create confusion. Mr Button recommended the law be re-enacted, possibly combined, as Wales law, incorporating all the alterations. Mr Button also suggested several minor amendments to the law which might be incorporated in a Bill.
- Several respondents highlighted concerns about the poor availability of Wheelchair Accessible Vehicles.
- Leonard Cheshire referred to its 'Driving Change' report in which several participants shared stories highlighting the negative impact of stigma, discrimination, and poor experiences with taxis and PHVs on their mental health.
- RNIB Cymru reported that, although illegal, Guide Dog refusals were the biggest cause of anxiety, frustration and anger for passengers with vision impairments who are Guide Dog owners.
- The Older People's Commissioner for Wales commented that the increasing use of smart phone apps for booking taxis will have a detrimental impact on some older people's ability to use taxis if steps are not taken to maintain offline services and ensure that these are to the same standard as online.

- Ceredigion Green Party commented on the absence of proposals for integrating taxis/PHVs into the overall provision of public transport and made suggestions for how this may be done.
- There was support amongst passengers for a national complaints process, with a view that this could be an important lever for improving standards.
- An operator commented that they understood the need for national standards and the goal of cleaner air, but there must be some carrot and not only a stick. Operators did not need more bureaucracy. The relationship with licensing authorities was often adversarial and the operator felt that lots of aspects of the proposals would increase this.
- Some people who work in the trade described the low level of trust they have in their local licensing authority. Some respondents opposed any increase in local authorities' powers, as they felt local authorities did not use the enforcement powers they already had. There was also a suggestion from some in the trade that licensing officers should work to a national standard overseen by a national body such as the Traffic Commissioner for Wales.
- People working in the trade also complained about unsatisfactory service from licensing authorities including long waits for licence applications to be processed and difficulties contacting licensing teams in some parts of the country.
- We heard from the trade that there is a shortage of taxi and PHV drivers. Someone who works in the trade commented that to get a taxi/private hire badge for the first time can be very expensive with costs of application, as well as medical and other checks. The respondent reported that many potential entrants are unemployed and are put off becoming drivers because of these costs.
- Other respondents commented that the taxi industry as a whole is relatively low paid so additional costs such as minimum age vehicles, industry exams, zero emission compliant vehicles are likely to force drivers out of the industry, which is still recovering from the pandemic.
- Another respondent suggested that taxi fares should be reviewed annually and adjusted in line with inflation.
- Trade Unions told us that a few large operators had effectively monopolised the private hire market in South East Wales. The unions argued that although drivers who work for these operators are theoretically self-employed, they are in fact completely dependent on the operators for work. Trade Unions asked for operators to be under an ethical code to provide transparent and challengeable contracts for drivers.
- Another respondent commented that the Welsh Government should consider capping the amount of commission an operator can take.
- The Licensed Private Hire Car Association requested further engagement on appropriate regulations, training and requirements for chauffeur and executive drivers that are not going to be subject to dual licensing.
- Tour operators explained the challenges they faced in meeting the PHV licence conditions and called for flexible regulation that was appropriate for their businesses.

- Some respondents suggested that the use of CCTV in taxis and PHVs should be mandated. Others were in favour of CCTV continuing to be optional.
- There were many comments about training for people working in the trade. Many respondents who represented passengers identified areas where they felt training would be beneficial. Some respondents from the trade were more in favour of training than others, but many felt that training needed to be manageable and affordable.
- Some people who worked in the trade commented on the absence of proposals to address the wellbeing of drivers, such as tackling long working hours.
- Some respondents suggested that Hackney Carriage booking offices should be regulated like private hire vehicle operators.
- FSB Wales commented that it is important that the aims for the sector and where it is to be steered aligns with any EV charging and infrastructure strategy, and looks at opportunities to develop the sector in new areas in the transition to EVs.
- Local authorities proposed that taxi meters should be used for all taxi journeys, including those that end outside the local authority area.
- Local authorities proposed standard national licensing fees.
- Local authorities proposed a standardised methodology for local authorities to use when calculating taxi fare levels.
- Local authorities and the Licensed Private Hire Car Association recommended the use of Restricted (Conditional) Licenses for home to school, and additional learning needs transport.
- A respondent suggested that illegally parked taxis and PHVs in city centres were blocking roads and preventing access by emergency vehicles. The respondent proposed that authorised licensing officers should have powers to move illegally parked taxis and to issue on the spot fines.

SECTION 3: Next Steps Statement

The Welsh Government appreciates all of the views expressed in response to this consultation which will help deliver our vision for a safer, fairer and greener taxi and PHV sector. The Deputy Minister for Climate Change will make an oral statement on 3 October outlining the next steps for taxi and PHV reform in Wales. We will continue to work with stakeholders as we develop our proposals further.

ANNEX A: List of Respondents

Age Cymru
Allan Cureton
Allen Williams
Andrew Currie
Barry Greig
Blaenau Gwent County Borough Council
Bridgend County Borough Council
C. Richardson
Cardiff Council
Ceredigion County Council
Ceredigion Green Party
Chartered Institute of Logistics and Transport Cymru Wales
Children in Wales
Chwarae Teg
City of Wolverhampton Council
Competition and Markets Authority
Dan K
David Luther Jones
Directors of Public Protection Wales
Electric Vehicle Association (EVA) Cymru
Flintshire County Council
FOR Cardiff
FSB Wales
Gavin Harper
GMB Union
Guide Dogs Cymru
Howl
Independent Training and Testing Company (ITTCO)
Institute of Licensing
James Button
Javed Ahmed Choudhury
Jeremy Ferguson
John Reece
John Rigdon
Kevin Heath
Khalil Ahmed
Learning Disability Wales
Lee Morgan
Leonard Cheshire
Local Government Association
Licensed Private Hire Car Association
Mark
Martin Hill
Mary Snowden
Merthyr Tydfil County Borough Council

Michael Shaun
Mid Wales Tours
Mindaugas Dzejas
Monmouthshire County Council
MT
National Private Hire and Taxi Association
Neath Port Talbot Council
Newport City Council
Nicky Jones
Nk
North Wales Licensing Authorities
Older People's Commissioner for Wales
Peter Lian Crawford
Phil Bates
Powys County Council
Priestly Pereira
Rhondda Cynon Taf County Borough Council
RNIB Cymru
Robert James Hatherall
Sanwar Ahmed
Satheesh Karunakaran
Scribes
Shahzad
Simone
Siôn Elis Williams
Soiful Islam
Suzy Lamplugh Trust
Swansea Council
Tajul Islam
Tipon Ehsan
Tom Jones
Torfaen Council
Uber
Unite the Union
Usk Cabs Ltd
Veezu Group
Visualise Training and Consultancy Ltd
Vale of Glamorgan Council
Wales Safer Communities Network
Welsh Local Government Association
Wrexham County Borough Council
Wrexham Chauffeurs Ltd
Zenith Logistic Consultants Ltd

60 respondents asked to remain anonymous.