

Daniel Cook | Team Manager,
Licensing (Cardiff)

Dear Daniel,

Please accept this document as our response to the proposal to be put to committee in regard to lifting the moratorium on Hackney Vehicle Licenses & the introduction of card payment requirements to Hackney Vehicles.

We do not agree with the wording on the survey that was released in regards to this matter or that a person could supply multiple responses as the survey suggested upon completion, Both the wording and ability to supply multiple responses, compromises the integrity this process.

The introduction of the survey that was also echoed by local media suggested that there had not been a new license issued for a Hackney vehicle since 2010 which is not true because several new vehicles have been added to the fleet during this time. The statement is misleading in that it makes the public believe that all the Hackney fleet are older than 13 years of age because it does not explain the workings of renewing a Hackney plate sufficiently to gain an educated response.

We agree that an Unmet Demand Survey must be undertaken before a cap on licenses may be introduced and good practice is that this survey must be undertaken every three years, however, although the Transport Act 1985 does not state that a survey must be undertaken before the cap is lifted, we believe it would be good practice to undertake such a task before any decision is made to get factual information in which a decision can be based. The license fees for Hackney Vehicles incorporates the cost of an unmet demand survey and does not cost the public any money we therefore insist that this survey be undertaken from monies taken from the trade in order to satisfy the person who makes the decision (which is this committee) that there is *no significant* demand that are unmet.

S16 Transport Act 1985 sets out that the number of HCVs can only be limited where there is clear evidence to show that there is no significant demand for HCVs which is unmet:

"...the grant of a license may be refused, for the purpose of limiting the number of hackney carriages in respect of which licenses are granted, if, but only if, the person authorized to grant licenses is satisfied that there is no significant demand for the services of hackney carriages (within the area to which the license would apply) which is unmet."

While the report that we have read states at 1.5 that the licensing department have received a number of complaints regarding passengers unable to get Hackney Carriages it fails to state how many complaints, a comparison to complaints against Private Hire Operators (for the same issue of waiting for a service) what times of the day or week these complaints relate to and the comparison of any complaints of the same nature before the Hackney Meter increase a few months ago. Because this decision only effects the Hackney trade, we believe that any complaints received should be filtered to the Hackney trade only.

The trade has a real-world view of what occurs in the Hackney industry and do not believe that there is an unmet demand issue in Cardiff and we have supplied images of what the waiting lines of Hackneys looks like both night and day in a further email to accompany this response.

We also witness the inability to drive off a rank with passengers due to the grid lock caused by the ever-increasing number of Private Hire Vehicles from many areas that have flooded Cardiff which in turn slows down the service that the Hackney trade supplies. This issue, and that of very limited ranks for Hackneys was supported by the police when a cap was placed on licenses, and we are positive that the police will have not changed their stance on this matter.

While the report states that there is a second market grown from the sale of Licensed Hackneys there is no legal basis for this statement due to vehicle licenses for both Hackney Carriage and Private Hire are transferable by law and the price agreed by the seller and the buyer is irrelevant to this discussion.

The same could be said for buildings who have previously been granted planning permission for use as Public Houses, Restaurants or Take Aways where the premises can demand a higher value, yet this is not an issue raised by Cardiff Officers.

We do however agree that cherry picking is still happening but on a less frequent occurrence, but we are of the opinion that releasing the cap on Hackneys would not resolve this matter but possibly contribute to it and that this can only be resolved by CCC undertaking test purchases to enable licensing to deal with the individuals involved, this is something that the trade would support.

The current level of working licensed vehicles (726) have only 35 spaces for them to park on a rank. The current 726 vehicles parked bumper to bumper can stretch to over 2 miles and the current cap of Hackneys (946) would stretch a staggering 2.5 miles, how much more road does Cardiff have to fit even more vehicles on if the cap was indeed lifted, and how would this effect air quality. These are questions you must ask yourself today.

Card Payment Machines.

We agree in principle for these machines to be added to the Hackney conditions, however, we do not agree that a vehicle should be taken off the road if these third-party machines are not working due to signal issues, breakdown or the supplier having technical issues and this must be reflected within the conditions if and when they are written.

Yours sincerely,

Sanwar Ahmed
Unite Wales