

it is therefore appropriate that the licensing process for these applicants is proportionate to the role they will undertake. In line with the majority of councils across the UK, we ask you to reconsider the value of testing applicants on skills and knowledge that are not directly applicable to the job they will undertake.

Receipt For Fare

- To future proof the conditions and to avoid any uncertainty, we would suggest that the requirement to provide a 'written receipt' be replaced with the requirement to provide a 'receipt', to allow receipts to be produced in more modern formats.

In regards to the *Proposed Policy on Hackney Carriage And Private Hire Licensing Standards For Vehicles, Operators And Operators* we would kindly ask you to consider the following:

Condition 8

In accordance with the definition of "Proprietor" as stated by the Local Government (Miscellaneous Provisions) Act 1976, the Council will not issue vehicle licenses to companies who intend to hire or lease the vehicle to a third party. In these cases vehicle licenses will only be granted to the person in possession of the vehicle under a lease or hire agreement.

This condition would have the unintended consequence of reducing the availability of specialist vehicles in the market (including wheelchair accessible and electric vehicles).

As an example, we are currently working with a company in another jurisdiction which rents Electric Vehicles to private hire drivers. The company facilitates the charging of these vehicles at its central hub and drivers are able to simply pick them up and drop them off when required (without having to worry about the charging infrastructure required). We are confident that this will be a catalyst for greater electric vehicle uptake.

Unfortunately, the outcome of the proposed condition would create an administrative burden for both drivers, operators and the third party companies which would inhibit the development of this model in B&NES.

I thank you for your consideration and would welcome the opportunity to discuss any of the submission in further detail.