

## Questions and Review of the Hackney and private hire licensing policy 2022 – 2027

Questions and clarification on proposals in regard to the following:

### Appendix A – Vehicle Specifications

2.3

2.4

2.5

With respect to Swale council aspiring to be carbon neutral by 2030, I have major concerns in Swale councils lack of investment in fast charging points with an inadequate infrastructure to support electric taxi's let alone local residents, currently I have researched and found only 13 charging locations collectively in all three areas Sittingbourne, Faversham & Sheerness out of the 13, four are in private company car parks and Hotels, so this leaves only 9 public charge points some of which are in paying car parks, is this free parking by the council if it's an electric car on charge? There is not enough chargers to even supply our own fleet of 24 if they was electric, without the 200 taxis coming from other operators to supply, my biggest concern is Swale councils approach to implementing a carbon neutral borough without an audit, an analysis or report available from Swale Borough council on the amount of chargers required to support 235 licenced Swale taxis, and how many chargers are required for supporting Swale boroughs 150k residents, Its fine making a declaration of going carbon neutral but where is the data to support its possible to supply a fully operational electric taxi service in swale, unless SBC has a crystal ball to see the future of vehicles are electric, how can you make policy without the technology being available today to support this policy change, I believe emissions should be reviewed annually based on the technology of the vehicles available to the taxi trade, a sub-committee comprising of operators and Hackney licencing to review lowering emissions yearly ultimately aiming for zero emissions would be more efficient than randomly making proposals to get on the environmental bandwagon without any research.

### **Logistical problems running a fully electric taxi fleet**

All of our drivers keep the vehicles at there home's all of our drivers do KCC school contracts so its imperative the vehicles are with them every morning, If they have electric vehicles none of them have any charging points at there homes, we do not have the premises to keep 24 vehicles, even if we did how could we possibly charge all of them, the average price of a charging point factoring in materials, connection type and installation costs would be between £1400 - £6200 depending on the kW charge, If we installed Chargers at every driver home address, if possible some live in flats others where the front door is immediately stepping onto a main road, restricted parking, residential parking permits that do not guarantee they can park outside there homes, private rented accommodation, some do not have anywhere to put a charger, and if this driver decides to leave or retire and we take on a new driver this amounts to more costs, and if this new driver decides to leave within a week how can we not incur more costs, and logistically how could we start a new driver until charging points are installed, please share on how you envisage this to logistically be possible.

KCC schools is an integral part of our business we have looked at mileage range with EV's and found them lacking, on average our vehicles do 40-50K miles per year and average school run is 120 miles per day, all of our vehicles are on a school run in the morning between 07:00am to 09:30am and all the other operators would be the same timings, so effectively this would mean 100% of our fleet and other operators could not supply a taxi to any domestic residential calls after 09:30am for at least an hour to four hours depending if it's a rapid fast charger which is going to be highly unlikely as every other operator will be trying to use the limited amount Swale has installed, so the majority of taxis will use a domestic home charger, there are two typical home chargers, (information from EV Connections Ltd) 3.7kW which estimates charging at 15 miles per hour and a 7kW charger at 30 miles per hour, both diminish depending on cold weather, based on these charging times per hour and our average school run mileage of 120 miles a taxi would need 2-4 hours charge to replenish in the mornings, or a taxi could continue to work returning back from a school run but would need to charge a min of 4 hrs to collect students in the afternoon, as most schools finish between 3pm – 3:30pm taxi would need to be on charge before 10:30am leaving local residents with a limited taxi service in the morning and also afternoons and early evenings when commuters are traveling, this also restricts late night working and offering a 24hr service, a full charge on domestic home chargers or plug in vehicles can take up to 18hrs.

Information taken from Auto Car, and other electric vehicle information websites reports batteries degrading over time between 70 to 82% even the latest lithium-ion cells aren't immune to losing performance over time, with a number of factors playing a role. the biggest single contributor to the decline in efficiency is the cycle of use and charging. Frequent draining of the cells followed by a full charge can, over time, damage the battery's ability to maintain its optimum energy storage - manufacturer's typically recommend charging only to 80% above 80% batteries tend to get hottest, which takes a toll on the battery cells, also recommend avoiding capacity dropping below 20%, these manufactures recommendations on maintaining battery life severely impedes taxi services even more so reducing the mileage ranges of EV's, although the need of more fast/rapid chargers would be needed for taxi's to try and maintain any kind of a normal service, using fast/rapid chargers best need to be used sparingly. Although fine for topping up on longer journeys, or in emergencies when you need a quick burst of energy, a by-product of rapid chargers' speed is the increased, lithium-ion damaging temperatures in the battery as it copes with the electrical onslaught to further degrading the batteries life, as a result of over using rapid chargers that taxi's would need to use constantly to maintain a service reduces the EV's life shorter distances ultimately the operator would never see a return for the investment in a EV.

Electric Vehicles or EV's are primary targeting the general public, local residents, EV's in commercial business is relatively new, as commercial businesses require especially in taxis longer mileage range, wheelchair accessible vehicles which there are **none** available, 7 seater MPV's which there is only a few models available with a 7 seat capacity at this time, there are no 9 seater available on the market, Taxi's would need to constantly use rapid chargers to maintain a normal service but at a cost of reducing the batteries life and the life of the vehicle.

### **Wheelchair Accessible Vehicles (WAV)**

There are NO electric vehicles with wheelchair access available (WAV), we supply not only Southeastern railway with WAV for disabled customers, we also supply Kent County Council for disabled children to take to school, under this proposal if we needed to replace one of our WAV's there is not anything available to replace it with? How can you expect us to comply when the vehicles do not exist? This also causes us problems in investing in a hybrid wheelchair vehicle as after 2030 they will not be licenced, this will leave many of our disabled customers, disabled school children unable to travel, imposing restrictions on their life's where many of our disabled customers rely on us, will SBC update their disability discrimination act, and on the Hackney policy to reflect Taxis can not supply disabled passengers because WAV do not comply with SBC policy of zero emissions.

Hackney carriage vehicles do not have the luxury of planning journeys which is imperative with electric vehicles knowing you need a recharging point along your planned journey, the below scenario in regards to hackney and local policy.

#### **Question: While on a Taxi Rank**

- A) can you refuse the fare if there are no chargers in the area customer needs to go to if the taxi would need to charge the vehicle to return
- B) can you refuse a fare if you do not have enough charge in your taxi to complete the customers journey
- C) Under current policy the taxi meter would stay on if you need to charge the taxi on route to a long distance location while customer is onboard!
- D) Taxi driver has a pre-booked job later in the day, while on the taxi rank customer needs to go a distance which would mean driver would not be able to complete his pre-booked job, can the driver refuse the fare
- E) Customer needs to make an appointment on time or picked up on time EV needs charging but have to go off route to find a charger now makes you late, and adds extra mileage to the meter looking for charger. Customer complains to SBC Driver Fault?

Taxi drivers earnings will be severely reduced operating fully electric vehicles, as they will be limited to accepting jobs if the vehicle is not charged or pre-booked jobs where they would need a charge in the EV to complete it accepting another job will restrict drivers ability to accept additional jobs, you couldn't work a EV over two shifts daytime and night time

## Operator costs

Our business costs changing to fully electric EV's for us as a company is a substantial which we have estimated over £2 million over the next 8 years to replace our fleet in comparison to £600K investment over 15 years in our current fleet to breakdown the extra costs, based on our location and need for long range EV's to operate the nearest to a normal service as possible.

To replace 6 seater MPV to EV currently Tesla make this model with the longest range 351 miles, Tesla Model X which I have posted a 2018 Model below which is currently for sale as of today 23.05.2022 for £82,600 a new model is between £102,980 - £110,980

we have 8 MPV's these alone would cost £853,840 new or £660,800 to replace, the best long range cars currently available are the Mercedes-Benz EQS with an estimated range of 430-450 miles price ranges between £169,00 - £100,00 new and second hand, the new Tesla Model S with an estimated range of 400 miles £100,000 to replace our fleet of 10 cars would cost £1 million, this does not include replacing WAV which do not exist, also does not include installation of charging units, speaking to our insurance broker Towergate they have informed me that Electric EV's add an additional 20% to insurance premiums this is a industry standard.

To invest £2 million over 8 years in EV's to replace the current fleet would not make anymore return in the investment than our original investment of £600K, Would SBC spend triple its budget to supply the same service?

## 2018 Model X

100D Long Range  
40,785 mile odometer  
Southampton

£82,600



**4.7s**

0-60 mph

**155mph**

Top Speed

**351mi**

range (NEDC)

Pearl White Multi-Coat Paint

20" Silver Slipstream Wheel

Cream Premium Interior

Smart Air Suspension

Ultra High Fidelity Sound

Enhanced Autopilot

30-Day Premium Connectivity Trial

### Personal Notes

I personally do not see any viable financial reasons why we would invest in EV's, I also have problems with EV's in relation to the production of the minerals mined for EV batteries, one mineral required is Colbalt of which 40% of worlds Colbalt is mined in Africa in the Congo, just a small amount of research can show you children are mining for 1 dollar a day working in treacherous conditions, I can not support this and claim saving the environment, if SBC continues with this policy change for 2030 we will wind up the company and cease operations, In effect SBC will reduce emissions as more and more operators will also dissolve by 2030

## Summary of Questions + more

- 1) SBC Infrastructure plans to implement charging points to support Taxi trade EV's
- 2) Information on SBC reports/analysis on how many EV charging points are required to support 235 licenced Taxi's in Swale and support 150K Swale residents in the future by 2035
- 3) How SBC envisage the future of EV's to logistically accommodate taxi drivers and the residential population of Swale to charge vehicles at home with no off road access
- 4) The cost of installation of home chargers for the operators taxi drivers, Drivers who may leave the operator and new drivers with no charging points delaying starting times, is there any grants from SBC to operators to implement these
- 5) Vehicle licencing a EV because of the high cost of EV's will SBC licence the EV;s for longer compared to 10 years currently
- 6) Wheelchair accessible, as Electric accessible wheelchair vehicles are not manufactured will SBC update there disability discrimination act to cover taxi operators can't supply wheelchair disabled customers because of SBC new policy of Zero emissions
- 7) Executive vehicles, what vehicles will be classed as executive if they also have to be EV, do Executive vehicle also have to comply with the new policy, as an example most executive vehicles being hired for weddings, company directors for meetings need to be on time how does SBC envisage executive business to travel on time with EV's when time is imperative to weddings and business appointments.
- 8) SBC taxi hackney policy questions on hiring a taxi on the rank
- 9) Operators costs SBC grants ?
- 10) What impact 235 taxi's will make in reducing Co2 emissions, will all staff and MP's at Swale borough council be implementing zero emissions and switching to electric, as there is more vehicles by employees and contractors than the entire Taxi trade.

Kindest Regards

Mark Richards

Sittingbourne Cabs