



Taxis Without Borders Comments to Welsh Assembly Petitions Committee
Reference Petition P-05-835

1. A Survey of 409 drivers showed that 63% of drivers have carried out jobs that was wholly in a council other than the one they are licenced by. Closing Borders would affect more than half of all Private Hire drivers adversely
2. The same survey showed only 18% of drivers work exclusively outside the authority they are licenced by, showing that there is no epidemic of drivers working exclusively outside their authority
3. From the same survey 64% of drivers live and mainly work in the authority they are licenced by, only 17% of drivers neither live or work mainly in the authority they are licenced by. This shows the majority of drivers either live or work where they are licenced.
4. 74% of the 409 drivers from the survey stated they prefer to work in an area they know. A claim by drivers wishing to see borders closed is that those working where they aren't licenced do not know their way around. The last two points prove this to be false.
5. 47% of drivers of the 409 drivers have been involved in a fault or non fault, or 50/50 RTC in the authority they are licenced, whilst only 23% have been involved in a fault or non fault or 50/50 RTC in an authority they are not licenced. This conclusively disproves that drivers working in an area they are not licenced are more dangerous on the roads
6. FOI Requests to all 4 Police Forces have revealed no criminal offences by any Private Hire driver outside of the drivers licensing authority, disproving the claims that drivers working outside of their authority are not safe
7. FOI requests to Cardiff, Caerphilly, Newport, Bridgend, Vale of Glamorgan, Bridgend & Swansea have shown no recorded complaints by members of the public about drivers working outside their licenced authorities
8. FOI requests to the same councils did not reveal any drivers being prosecuted for plying for hire outside of the authorities they are licenced. It is often falsely claimed that drivers working outside the authority they are licenced are regularly illegally plying for hire
9. An FOI request to Swansea County Council revealed that there are 19 home to school contracts carried out by Private Hire drivers that start and finish outside of Swansea County Council. Whilst the number of Swansea Licenced Private Hire drivers doing this

school runs is not known, it is common practice for council to contract school runs to Operators licence by themselves, as opposed to another authority, so it is highly likely most of these school runs are carried out by Swansea Council licenced Private Hire Drivers, working across Cross Borders.

10. An FOI request to Newport County Council revealed there are 37 home to school contracts that start and finish outside Newport Council boundaries that are carried out by Newport Council Operators
11. It is claimed that drivers should not be allowed to work in areas they are not licenced by as they have not sat and passed a route knowledge test, and as such do not know their way around. An FOI request to Cardiff Council revealed there are 3,803 streets or roads in Cardiff Council. An analysis of the Cardiff Council Private Hire / Hackney Carriage Route Knowledge test showed that there are 327 different roads named on the test. Or to put it another way, a candidate only has to learn 8.5% of all the roads in Cardiff in order to pass the councils route knowledge test. Hardly proof of a comprehensive knowledge of the city, proving that passing a route knowledge test is not proof a driver knows their way round. This is further backed up drivers using Sat Navs in authorities they are licenced by.
12. An investigation into the requirements for a Private Hire licence by all the authorities in Wales showed that only 2 councils offer separate Private Hire and Hackney licences. Conwy and Newport. Every other council only provides a Dual Badge, namely a combined Private Hire & Hackney licence. Neither Conwy or Newport require candidates to sit a route knowledge test for a Private Hire licence, but both do for a Hackney licence. All other councils require a candidate to sit some form of route or area knowledge test for the dual badge. This suggests, that any route or area knowledge test is to satisfy the requirements for the Hackney element of the dual badge, and therefore not relevant to Private Hire drivers
13. Across Wales, numerous people rely on cross border operations for their private hire requirements. Just 3 examples;
 - 8a - Tesco in Risca is part of Caerphilly County Borough Council, yet night shift workers who live in Abercarn or Cross Key and require a taxi home at 5am are forced to book this through Dragon Taxis in Newport, as there are no local firms operating at the time.
 - 8b - The Copthorne Hotel is located in the Vale of Glamorgan, yet they have a contract with Dragon Taxi's in Cardiff as the nearest Vale of Glamorgan operators are located in Barry.
 - 8c - The town of Magor is in Monmouthshire, yet the nearest Wheelchair Accessible Vehicles in Monmouthshire are located in Monmouth, so those who need access to such a vehicle are forced to use Newport Firms
14. Councils in Wales are relatively small, and there is often no discernable border between two authorities. Indeed Rogerstone is in Newport County Council, and as mentioned previously Risca is in Caerphilly County Council, yet there is no gap between the two towns. This is repeated all over the country. Particularly in South Wales. With the Borders between Cardiff & Newport easily confused to the East of the city. Many people believe St Mellons Hotel to be in Cardiff, whilst it is actually in Newport Council. The same is true to the West of the city and boundary with the Vale of Glamorgan. The

Copthorne Hotel, Tesco Culverhouse Cross are both thought to be in Cardiff, but are actually in the Vale of Glamorgan. The lack of clear distinction between a number of borders will lead to many people inadvertently breaking the law opening themselves up to prosecution

15. Closing borders would affect someone's ability to move around the country and carry on working without unnecessary additional costs of having to pay, often many hundreds of pounds, to get relicenced where they now live in order to carry on their chosen profession
16. Customer choice is another reason why Cross-Bordering needs to be kept alive. At the moment people are free to phone whomever they choose for their needs. Be it phoning the local firm to get home from the pub, or phoning an executive travel firm in a different district to take you on your honeymoon. Or even using an app to see if there is a PHV from anywhere around in the sticks to pick you up because your friends thought it would be a fun idea to get you drunk and leave you in the middle of nowhere with just your phone on your stag do. Closing borders will remove customer choice, as someone's preferred company may not be able to service the area they are in, despite being geographically local enough to be able to. With a limited competition, companies are less inclined to offer exceptional service in order to retain some ones custom, mainly because there are very few other places to go. The customer has a right to good service, and cross-bordering induced competition, provides that very incentive.
17. Critics will claim that cross bordering increases congestion and pollution. Where in fact the opposite is true. A Vale of Glamorgan PHV could pick someone up and take them home to Caerphilly after their holiday. That PHV's operator could have a booking to collect someone from Pontypridd, a mere 7 miles away, to pick someone up and take them to the airport, only it is not for 4 hours. The operator could make the first car go all the way back to Cardiff Airport empty, and then send a second car empty for the later pick up. This would be a chronic waste of time, and needless pollution, where what the operator could instead do, is contact a local firm in either Caerphilly or Pontypridd, and explain they have a car in the area if they can be of service. The Caerphilly or Pontypridd firm, could then sub work to the Vale of Glamorgan operator to keep the original car active. Thus removing the need to have a second vehicle on the road adding to congestion and pollution. Making air quality worse. Cross bordering allows for a more efficient use of vehicles up and down the country
18. The operator has a greater area from which they are allowed to take bookings from, and the driver has a greater area in which he is allowed to work, This increases the companies and the drivers profit margins. As shown by Dragon Taxis exclusivity agreement at the Welsh Fest Festival in The Vale of Glamorgan this summer. Despite Dragon Taxis not having a Vale of Glamorgan operators licence, and as such not being able to use any Vale of Glamorgan vehicles to service this agreement
19. Taxis Without Borders acknowledge that if not at saturation point, for the number of Hackney and Private Hire Vehicles (PHV's) working in the city of Cardiff, then it is indeed near. However, what is saturation point on one day, is a massively insufficient supply the next day. In many ways, Cardiff is a unique city in the United Kingdom. According to <http://worldpopulationreview.com> it is only the 11th largest city in the UK, with a

population of just shy of 450,000 residents in 2018. National Geographic estimate 18 Million people visit Cardiff each year, making it the 6th most visited City in the UK. Additionally it has the 4th largest Stadium in the UK. Outside of London, only Old Trafford in Manchester is bigger by a measly 1,200, and Manchester has a population over 5 times that of Cardiff. With the roof closed, The Principality Stadium is effectively the largest indoor arena in Europe. These figures show that not only does the number of Hackney's & PHV's required to meet the cities needs vary widely, If only for this reason alone, PHV's should be allowed to retain the ability to work anywhere in the country. The 11th largest city, yet the 6th most visited, the 4th largest stadium in the UK, and the largest indoor arena in Europe. Cardiff drivers may moan about cross bordering, but more than anywhere in Wales, and possibly anywhere in the UK, Cardiff NEEDS cross bordering to keep its residents and visitors moving.

This petition was brought about due to The Welsh Assembly Government's impending reforms on Private Hire & Hackney legislation in Wales, and the acts of a small insignificant number of Private Hire drivers in Cardiff's desire to see cross bordering abolished as part of the reforms. The above points are just a few of the reasons why cross bordering should remain, even when legislation is reformed, however it was requested to keep the comments to 3-4 pages. It is believed however, that the above points on their own are enough to show the committee that the petition should indeed be put forward to be discussed in the Assembly as part of discussions once the White Paper on the reforms is published by Ken Skates. Whatever the reforms the white paper wishes to introduce, it is imperative that cross bordering remains. Closing borders will affect drivers, operators, and customers. It will remove customer choice, increase needless doubling up on journeys, reduce customer service and have a negative effect on business and the prosperity of Wales going forward