

19/8/08

Mr R Cox.

Taxi Consultation.

Item 1.2. Full Name.

As stated in my previous correspondence Health and Safety recommend Forename only on badges. As requested many times over the last three years by many drivers and by signed petition. The request is to have full name removed . London Hackney driver only have a number and no name. As stated in your email to me on 27th May 2008 when the proposed Policies and Conditions document goes to the committee the issue of names on badges will be presented .

Item 28.7. Trailers.

Only Trailers 750k and over are fitted with braking systems.
Outlets selling small trailers do not have braking systems on them or can you order them.
Manufactures do not fit them to smaller trailers as there is inadequate room for them.

Item 34.1. CCTV .

Cabwatch hold the software for the CabWatch camera's . It is registering with Data Protection to retrieve the data in a secure environment. It is then handed to the Police when requested. As the Council do not hold this software it would be difficult for the Council representative to retrieve the data .

Item 1.8. Construction .

Standard black colour.
Black is not a standard colour used by most manufactures.
Silver is now the most accepted colour.

Disadvantages of black:

Hard to keep clean
Marks to paint after rain (grey dots etc)
Not visible in unlit areas (unsafe for drivers)

Advantages of silver:

Easy to keep clean (even when dusty through driving it does not show the grime as much)
Can be seen in unlit areas (safer for the driver)

R.C agreed with A.G in a conversation that silver was more practical.

Most manufactures make more silver cars than black.

Suppliers e.g. Car Giant carry mainly silver in stock with very few black.

2.

Drivers who are self employed should be given a choice or be able to choose the colour they prefer. London Hackney Carriage vehicles are no longer one colour.

As a previous owner of a black taxi I have first hand experience and know that it is difficult to keep the body work clean with heavy mileage.

Item 18 page 30 Interior.

No loose covers.

Loose covers are used by many drivers to protect their seats.

They are used to keep the seats hygienic (not unhygienic as stated in your email)

Badly fitted covers I agree should not be allowed.

Seat covers are required as a part of a taxis job.

The public have no respect for a taxi and at the weekends picking up from the LP and Station taxi seats take a lot of punishment . Loose covers can be removed and washed seats cannot.

Seat covers suffer abuse at weekends i.e. Drinks spilt , food and sauces, sick, urination, muddy feet from children, rain etc.

When you are dealing with all these at weekends seat covers are necessary.

If a passenger is sick seat covers can be removed and the vehicle cleaned so the driver can continue work . Without seat covers many taxi's would not cover the L.P or the Station. Drivers would not be able to pick up customers with wet seats (because the seats were soiled and cleaned and still wet) because they were not protected

The only sensible answer is loose seat covers allowed as long as they are well fitted.

Heather Morris

From: Sbc-Website
Sent: 05 August 2008 00:17
To: Licensing
Cc: Sbc-Website
Subject: Taxi and Private Hire Policy Consultation Form submitted

Taxi and Private Hire Policy Consultation

Ref ID: 12275

Date: 05.08.2008

User Details

Submitted By: Mr J
Organisation:
Address:

Stevenage
Herts
SG1

Tel:

Email Address:

Questions

Livery? N
Maximum age limit? N
Wheelchair accessible? Y
Medical report? Y
English language test? Y
Driving test? Y
Standard door sign? Y
Interior identification plate? Y

COMMENTS

INTRODUCTION

I am in agreement with legislation to raise the standards of customer care and service within the hackney carriage and private hire trade. Many of these proposed changes are long overdue.

I don't know why the maximum age for vehicles was dropped. Very few older vehicles will be safe or comfortable after five years old as taxis. Do we really want to go back to aged clunkers plying for hire? One driver has bought an old Jag. Do we want old Jags and Mercs as hackney and private hire cars? Let's bring back Terry and Arfur in Minder.

PROCEDURES AND STANDARDS

DRIVERS

APPENDIX A

APPENDIX B

About time all the drivers had one licence. We all have to take the same test and adhere to the same regulations. Isn't it time to remove restrictions on hackney carriages too? We could streamline the whole industry with just hackney carriages in Stevenage and leave the private hire licences for chauffeur cars, stretch limos and school minibus operators as I believe they were originally intended.

At the moment we have a confusing mish-mash of regulations which leave us short handed on the ranks and at times when taxis are needed on the road. Most HCV's are owned and run by drivers near or past retiring age who use the trade to supplement their pension. They are not interested in working early mornings or late nights. PHV's are in a majority, but they cannot work the Leisure Park, station, White Lion or town rank. As a result people are kept waiting in large queues for unacceptable amounts of time during which they get involved in arguments or fights with other people waiting for cabs. At the same time, PHV drivers are sitting around waiting for people to phone them.

All taxis in Stevenage should be HCV's. Are the Council frightened of upsetting drivers who have paid vast sums for their plates on the black market? Is their greed going to hold back the trade forever? I want my wife and daughter to know for sure that the car they get into is a proper taxi. As a PHV driver I pay the same for my licence as a HCV driver. Why am I restricted in when and where I can do my job?

APPENDIX C

APPENDIX D

APPENDIX E

APPENDIX F

APPENDIX G

Do they broadly agree with the proposed policy? : Y

GENERAL COMMENTS

Heather Morris

From: Sbc-Website
Sent: 05 August 2008 00:34
To: Licensing
Cc: Sbc-Website
Subject: Taxi and Private Hire Policy Consultation Form submitted

Taxi and Private Hire Policy Consultation

Ref ID: 12276

Date: 05.08.2008

User Details

Submitted By: Mr J
Organisation:
Address:

Stevenage
Herts
SG1

Tel:

Email Address:

Questions

Livery? N
Maximum age limit? N
Wheelchair accessible? N
Medical report? N
English language test? Y
Driving test? Y
Standard door sign? N
Interior identification plate? Y

COMMENTS

INTRODUCTION

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PROCEDURES AND STANDARDS

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DRIVERS

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APPENDIX A

Fair play.

APPENDIX B

Good.

APPENDIX C

Well done.

APPENDIX D

Yeah right.

APPENDIX E

Needs doing.

APPENDIX F

Surely a joke. No pole dancing?

APPENDIX G

Bring it on.

Do they broadly agree with the proposed policy? :

GENERAL COMMENTS

Alison Watts

From: Sbc-Website
Sent: 13 August 2008 13:53
To: Licensing
Cc: Sbc-Website
Subject: Taxi and Private Hire Policy Consultation Form submitted

Taxi and Private Hire Policy Consultation

Ref ID: 12424

Date: 13.08.2008

User Details

Submitted By: Mr [REDACTED]
Organisation: React Disability Group
Address:

[REDACTED]

stevenage
herts
SG2 [REDACTED]

Tel: [REDACTED]

Email Address: [REDACTED]

Questions

Livery? Y
Maximum age limit? Y
Wheelchair accessible? Y
Medical report? Y
English language test? Y
Driving test? Y
Standard door sign? Y
Interior identification plate? Y

COMMENTS

INTRODUCTION
re; accessible taxi's. not sure if having one taxi available at all times is enough?
you could check this with equality and human rights website.
[REDACTED]

PROCEDURES AND STANDARDS

DRIVERS

APPENDIX A

APPENDIX B

APPENDIX C

APPENDIX D

APPENDIX E

APPENDIX F

APPENDIX G

Do they broadly agree with the proposed policy? : Y

GENERAL COMMENTS

LICENSING

22 SEP 2008

Heather Morris

RECEIVED

From: Alison Watts
Sent: 22 September 2008 15:10
To: Heather Morris
Subject: FW: Taxi & Private Hire Conditions
Attachments: Changes to Taxi & Private Hire Conditions.doc

From: [REDACTED]
Sent: Monday, September 22, 2008 3:07:37 PM
To: Licensing
Subject: Taxi & Private Hire Conditions
Auto forwarded by a Rule

Please find attached my views to the changes Taxi & Private Hire conditions.

Can you please confirm you have received this file

[REDACTED]

22/09/08

[REDACTED]
[REDACTED]
Stevenage

Herts

SG1 [REDACTED]
[REDACTED]

Changes to Taxi & Private Hire Licensing Conditions

To Licensing Stevenage Borough Council

Thank you for your Draft copy of the Taxi and Private Hire Conditions of Licensing. I would like to object to the following proposed changes that will affect the Taxi Trade in Stevenage.

Page 34

5.1

I believe that it would be a wrong decision to make all Wheelchair Taxis to load / unload passengers from the side. At present in Stevenage we have a mixture of vehicles that cater for all kind of disabilities. Some wheel Chairs can only fit into certain type vehicles so if we make it policy for side loading only this will only suit some wheels chairs.

Also Ambulances, Dial Ride, React and Lister Shuttle all use Rear loading for Wheel Chairs so why change this for Taxis?

Page 7

DSA Tests.

I am a little concerned that a driver would be asked to take and pass a DSA test for such minor offences and who is to pay for this test and at what cost?

You get a fixed penalty for parking on double yellow lines!

A blame worthy accident - Every body has accidents from time to time

For a Reasonable Cause – What does this mean what is reasonable?

Page 46

1.10

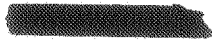
In Stevenage most drivers are self-employed and hire a radio off of the companies to gain work. Drivers choose their own hours so it would be impossible for an operator to enforce that a Wheel Chair Accessible vehicle will be available to book 24hrs away nor would it be cost effective for a company to have this in place.

Page 33

1.8

I would like to add I am in favour of all Hackney Carriage Vehicles being of the colour black as this is a traditional colour for a Taxi; this would also help distinguish between licensed Taxis and private hires.

Kind Regards



29/9/08

RECEIVED

[REDACTED]
Stevenage
Hertfordshire
SG2 [REDACTED]

Dear whom it may concern,

This is a letter of objection for
the by-laws;

1. Medicals every 3 years - when HGV drivers only have a medical every 5 years from 45 years onwards.
2. Badges - Names on it, when 6 years ago it just a number on it. Many you wouldn't be able to pronounce!
3. Seat covers fitted - Many ordinary ones cover to keep car looking clean and tidy! (Drunk and elderly forgetting themselves.) ✓
4. Back Loads - On disabled vehicles. Dial-a-ride, React, Lister Shuttles, and ambulances, (are backloads).
5. Age Limit for cars - Should be over 185,000.
6. Stickers - Should be magnetic. Reason being easy to remove, when on private jobs, or out with the family.
7. Two Fire Extinguishers.
8. DSA Test - Do not agree on re-testing, (singled out, or get rid of drivers you don't want!)
9. Safety Hammers.

Yours Sincerely

[REDACTED]

ENV. HEALTH

27 OCT 2008

RECEIVED

[REDACTED]
Stevenage
Herts
[REDACTED]

Dear Sir or Madam,

This is a letter to put in an objection of the recent by-laws you would like to change;

1. Medicals every 3 years - when HGV drivers only have a medical every 5 years from 45 years onwards.
2. Badges - Names on it, when 6 years ago it just a number on it. Many you wouldn't be able to pronounce!
3. Seat covers fitted - Many ordinary ones cover to keep car looking clean and tidy! (Drunk and elderly forgetting themselves.)
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9. Safety Hammers.

Yours Sincerely

[REDACTED]



2ND October 2008

PADS FM SERVICE

07 OCT 2008

RECEIVED

ENV. HEALTH

7 OCT 2008

RECEIVED

.changes to Taxi & Private Hire Licensing Conditions

To Licensing Stevenage Borough Council

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A blame worthy accident - Every body has accidents from time to time

For a Reasonable Cause – What does this mean what is reasonable?

Page 8

Medicals

I think we should have a medical then we reach 65 and every year after that

Page 11

1.2

Full names on badges – For a couple of years now we have waited for this to go to committee as we complained to the council when this first happened.

Names never used to go onto drivers badges as each badge has a number. I Would like to go back to having just a number as I don't wish for every member of the public knowing my full name as is could become a security or ID issue.

Page 30

1.8

Every taxi I have had in the last 9 years I have had fitted waterproof and wipe clean seat covers. So why exclude seat covers?

In this job you deal with all types people from intoxicated to the Elderly, Children Dirty workmen etc. If an accident occurs for example – vomiting, urinating. Spills etc.

At least with seat covers you can clean the mess up very easily or even change them for a new set if damaged.

Page 25

23.4

Door Signs – In the past magnetic signs have been used and I can see no reason to change this. There are times when customers request you don't have signs on the car for example – Executive work, weddings, Funerals. Ministry of defence.

You will also find that when you peel off a sticker it can cause damage to the paintwork of the vehicle.

Page 29

29.2 & 29.3

At present we have a council test once a year & an M.O.T it would make more sense to have a council test in the first part of the Year then 6months later have your M.O.T.

150,000 miles – this figure seems to be very low as most full Time Taxi Drivers do between 45000 – 55000 miles per year.

Page 46

1.10

In Stevenage most drivers are self-employed and hire a radio off of the companies to gain work. Drivers choose there own hours so it would be impossible for an operator to enforce that a Wheel Chair Accessible vehicle will be available to book 24hrs away nor would it be cost effective for a company to have this in place.

Page 33

1.8

I would like to add I am in favour of all Hackney Carriage Vehicles being of the colour silver as this is a traditional colour for a Taxi; this would also help distinguish between licensed Taxis and private hires.

Kind Regards

LICENSING

14 OCT 2008

RECEIVED

[REDACTED]

[REDACTED]

Stevenage

Herts

SG1 [REDACTED]

5th October 2008

To Licensing @ Stevenage Borough Council

I have downloaded a copy of the Approved and Adopted Taxi and Private Hire Conditions of Licensing.

I would like to object to the following proposed changes that would affect the private hire and taxi trade within Stevenage.

Page 7 DSA Tests

I feel the DSA test is a good idea for new applicants; however I am a little concerned that drivers may have to take a test for minor incidents and accidents. As I am sure you would appreciate accidents and incidents can occur to us all at times. I am also concerned that a test may have to be taken if a fixed penalty notice is received. You can receive a fixed penalty for speeding 5mph over the speed limit or stopping on double yellow lines. This section states that a test may have to be taken for any other reasonable cause, what do you mean by reasonable?

Appendix A 1.2 Full names on badges

The Taxi trade presented Stevenage Borough Council with a petition to remove surnames from badges and we were promised that the matter would be heard by the committee, what was the outcome? I feel that having our full names on our badges could be a security issue. The public do not need to know our full names as our badges all have an individual number to recognise us if a complaint was made.

Appendix A 2.2 Medicals

I do not feel that it is necessary for all taxi drivers to have a medical every 3 years when a bus or lorry driver has to have a medical every 5 years after the age of 45. This is an unnecessary cost to the taxi trade and should be re-addressed.

Appendix B 13.1 and Appendix D 5.1

I feel that it would be a wrong decision to make all wheelchair accessible vehicles load/unload from the nearside rather than the rear of the vehicle. At present we have a mixture of vehicles that cater for all types of disabilities. Some wheelchairs do not fit into some vehicles that load from the nearside. This may discriminate against some wheelchair users. I do not feel that this is necessary as ambulances and special needs vehicles are all rear loading, so why change the rules for taxis.

Appendix B 21.1 and Appendix D 13.1 Conditions

It is stated under this section that we should carry a copy of the Licensing Conditions at all times so that they are available for inspection by an authorised officer, Police constable, hirer or passenger. I have been a taxi driver for four years and have never been issued with a copy of the conditions. Will you be issuing a copy of the conditions to every taxi driver?

Appendix B 28.7 and Appendix D 20.7 Trailers

This section states that a trailer used for the taxi trade must be a braked trailer, but it is not possible to get a braked trailer which weighs less than 750kgs. It is not necessary to have a trailer weighing more than 750kgs for passengers luggage. The law states that a trailer only needs to be braked if it weighs in excess of 750kgs.

Appendix B 29.3 Age Limits

This section states that a car which has 150,000 miles must be compliance tested twice yearly. This figure seems too low as an average full time taxi driver does between 50,000 and 60,000 miles per annum.

I would appreciate it if you would consider these points when approving the Taxi and Private Hire Conditions of Licensing.

Yours sincerely



LICENSING

21 OCT 2008

RECEIVED

Stevenage
Herts

SG2

20-10-08

Ref. Consultation period 1st August to 31st October 2008.

Dear Sirs

I would like to take this opportunity to thank you for the Hackney Carriage office for trying to improve the taxi private hire trade. I can see a lot of effort has gone into the draft copy, whilst I would still endorse any changes in the trade I do have some concerns. I am finding it increasingly frustrating the way we are being dealt with.

The role of licensing (is to protect the public) I find it offensive because surely Mr. Cox is there to help both parties. It seems all we get are more rules and costs and it does come across that Mr. Cox is against the trade.

The feeling out there is not one of harmony. I feel sometimes Mr. Cox does not want to listen to the trade and has his own agenda. All this aside lets try to improve the trade out there and get conditions we can all work to and earn a living by.

ACCESSIBILITY

This is my biggest problem. Ref Page 4

Most companies only run as a booking office, some do not own cars so they cannot provide wheel chair accessibility 24hours.

PAGE 19

I cannot understand why there is such a big issue about loading vehicles from the side doors. When you look at the National Health Service, ambulances, lister shuttle buses are all loaded from the rear. Special needs school buses, dial a ride buses which are sponsored by the local government are loaded from the rear. I think this needs a lot more discussions so we do not make a mistake when applying these applications for licensing.

ACCESS TO AND EGRESS FROM

PAGE 19, 13.3

Why does the council still license vehicles with one door, so there is only access and no egress?

TYPES OF VEHICLES

Under this draft this would exclude too many decent type of wheel chair accessible vehicles, to name one Fiat Doblo. This vehicle is one of the best adapted for our town and it is not given the credit it deserves. To sum this up my objection against some of the content in this draft there has to be more sympathy with the drivers and more leniency over wheelchair accessible vehicles.

I would welcome talks with Hackney Council or even the chance to put my case forward to the sub committee.

Yours truly,

Heather Morris

From: Alison Watts
Sent: 31 October 2008 15:59
To: Robert.Cox; Heather Morris
Subject: FW: Taxi and Private Hire Conditions of Licensing consultation comments

Attachments: Stevenage Borough Council - Consultation comments.xls



Stevenage Borough
Council - Co...

-----Original Message-----

From: [REDACTED]@vosa.gov.uk [mailto:[REDACTED]@vosa.gov.uk] On Behalf Of [REDACTED]@vosa.gov.uk
Sent: 31 October 2008 15:32
To: Licensing
Subject: Taxi and Private Hire Conditions of Licensing consultation comments

Please see attached spreadsheet.

Regards

[REDACTED]

Roadworthiness and Testing Policy Group
Vehicle and Operator Services Agency
Unit 8 Woodlands Court
Almondsbury Business Park
Ash Ridge Road
Almondsbury
BS32 4LB

(See attached file: Stevenage Borough Council - Consultation comments.xls)

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DRAFT TAXI AND PRIVATE HIRE CONDITIONS OF LICENSING

Page No.	Reference	Comment
Whole document		Use of apostrophes throughout document
Whole document		No mention in document of any policy concerning roof racks
1	Definitions	Should include definition of WAV
1	The Role of Licensing: Policy and Justification	Typo in first line: insert the words 'in its' between 'authority' and 'licensing'
7	Driving Proficiency and Qualifications	In the last sentence, D.S.A should be DSA in line with the Definitions
12	2.1	G.P. should be GP in line with the Definitions
12	2.3	G.P. should be GP in line with the Definitions
14	6.1	Typo in first sentence: Replace comma after occurrence with 'of' This refers to British Single Vehicle Type Approval, but the correct term is British Single Vehicle Approval. However, you should also be aware that from 1st April 2009 SVA will be replaced by the IVA scheme (Individual Vehicle Approval)
17	9.1.3	Refers to an M1 Type Approval Certificate, but surely vehicles with an M2 Type Approval Certificate could also be used?
17	9.3.4	What about hybrid or electric vehicles?
17	9.7	Does the air conditioning have to be able to be controlled by the rear seated passengers if this exemption is to apply?
19	12.2	Refers to an M1 Type Approval Certificate, but surely vehicles with an M2 Type Approval Certificate could also be used?
19	13.2	This gives suggested minimum contents for the first aid kit, but 16.1 states that the first aid kit must be approved by the council. Surely the council would only approve a first aid kit that had appropriate contents? Additionally, there is no mention of replenishing the contents of the first aid kit.
21	16.2	I'm not sure what this is getting at. Is it requiring a vehicle to have at least four wheels, thereby excluding the use of a three-wheeled vehicle? As it reads, a minibus with six wheels need only have four of them to have tyres in a roadworthy condition!
22	18.12	Reference to glass should be changed to lenses, as rear light lenses are seldom made of
29	9	Suggest that this item is removed as it is a requirement of every vehicle on the road and is not therefore indicative of an "Exceptionally Well Maintained Vehicle"
29	16	Typo - should have the word 'with' between 'fitted' and 'no'
30	18	This refers to British Single Vehicle Type Approval, but the correct term is British Single Vehicle Approval. However, you should also be aware that from 1st April 2009 SVA will be replaced by the IVA scheme (Individual Vehicle Approval)
32	1.1.3	Refers to an M1 Type Approval Certificate, but surely vehicles with an M2 Type Approval Certificate could also be used?
32	1.3.4	What about hybrid or electric vehicles?
32	1.6	Refers to an M1 Type Approval Certificate, but surely vehicles with an M2 Type Approval Certificate could also be used?
34	5.3	Refers to an M1 Type Approval Certificate, but surely vehicles with an M2 Type Approval Certificate could also be used?
34	5.5	This gives suggested minimum contents for the first aid kit, but 8.1 states that the first aid kit must be approved by the council. Surely the council would only approve a first aid kit that had appropriate contents? Additionally, there is no mention of replenishing the contents of the first aid kit.
36	8.2	I'm not sure what this is getting at. Is it requiring a vehicle to have at least four wheels, thereby excluding the use of a three-wheeled vehicle? As it reads, a minibus with six wheels need only have four of them to have tyres in a roadworthy condition!
37	10.12	Throughout this Appendix there are many references to 'hackney carriage', which seem inappropriate as the appendix is about the conditions of licence for a private hire operator.
44	Appendix E	The last sentence is grammatically incorrect and needs rewording.
51	3.1	

STEVENAGE CABTRADE ASSOCIATION

[REDACTED]

mob: [REDACTED]

5th November 2008

Dear Heather,

As requested please attach to original draft objections. 30th ^{October} ~~September~~ 2008.

Members :

Licensed Hackney, Private Hire, Operators, Owners.

Our views and concerns and objective criticism of draft by Stevenage Borough Council

Taxi and Private Hire Conditions of Licensing dated 1st August-31st October 2008.

Chairman.

Vice Chairman

.....

STEVENAGE CAB TRADE ASSOCIATION

[REDACTED]
Mob: [REDACTED]

29nd October, 2008

Emma Rose
Head of Environmental Health
Danestrete
Stevenage
Herts.

Dear Emma,

Stevenage CabTrade Association representing Hackney, Private Hire, Owners and Operators.

RE: VIEWS, CONCERNS AND OBJECTIONS TO PROPOSALS TO TAXI AND PRIVATE HIRE CONDITIONS OF LICENSING BY STEVENAGE BOROUGH COUNCIL. DATED 1st AUGUST-31stOCTOBER 2008.

With reference to the above, please see our objections to the proposals set out below and we would like to point out the paragraph which states

'Licensing requirements which are unduly stringent will tend unreasonably to restrict the supply of taxi and PHV services, by putting up the cost of operation or otherwise restricting entry to the trade. The Council recognize that too restrictive an approach can work against the public interest and can, indeed, have safety implications'

Is this in contradiction to the following proposals set out in the draft document? We have read the draft proposals of Taxi and Private Conditions. The trade found this draft confusing in sections. There is one condition for private Hire and one for Hackney Carriage.

The majority are the same; most Hackney and Private Hire Drivers/Owners are similar as written in Misc Act 1976.

Objectives

The council is a service industry. Licensing Enforcement of Acts/Conditions. The protection of public and Licensed Trade in Health and Safety Act 1974.

The establishment of a professional and respected Hackney Carriage and Private Hire trade. (please define)

Most of us are self employed, licensed and professional.

Public access to an efficient and effective public transport. Taxis and Private Owners are self employed, we are not subsidised like other forms of public transport.

Conditions

All the acts, conditions should be given to every Licensed Hackney/Private Hire Operator/Owner s as they have to adhere to them.

Some of the conditions are unduly stringent and unnecessary also there is no human element in the conditions.

<u>PAGE NO</u>	<u>SUBJECT</u>	<u>OBJECTION DETAILS</u>
3 of 56	Implementation	If in time this document is implemented there should be NO financial obligations on any of the licence holders.
4 of 56	Accessibility	<p>Objection – Taxi drivers are self-employed. No PHO has been issued with a W/C accessible vehicle.</p> <p>This proposal is not within the PHO jurisdiction. Any new ruling will need to be inclusive of all PHO irrespective of the number of vehicles on their circuit.</p> <p>There is no Government Legislation (Acts) for Private Hires to have one. Until the Government implement a Police clause Act, DDA act there is no national criteria.</p> <p>There are 3% wheelchair and 8% disabled vehicles.</p>

Environmental Considerations

Please define policy and government guidelines. Smart cars do not meet the conditions i.e.997cc engine.

<u>PAGE NO</u>	<u>SUBJECT</u>	<u>OBJECTION DETAILS</u>
5 of 56	Livery	<p>The trade strongly object to the licensing condition where by Hackney Carriage vehicles have to be manufactures black.</p> <p>We the trade our self employed and have the right to choose which colour we like.</p> <p>As long as a Hackney Carriage vehicle complies to regulations i.e. mechanical , illuminated dome light an night and have the regulation plate at the rear.</p> <p>It is restrictive practice that Private Hire cannot choose it's Own colour for its own type of trade.</p> <p>Driver object to the condition that every Private Hire has to display a door sign of a type and approved by the council. Companies have different designs so the can stand out . As discussed with R Cox letter 3/3/06 it. was agreed on door signs if used should be uniform in wording. Discussed at the forum meeting in June 2007 . It was agreed in Signs should have read Stevenage Licensed, Private Hire name</p>

number, advance bookings or pre bookings only. Magnetic is safer for health and Safety reasons to be removed at end of evening shift.

Also can be removed in bad weather or on motorways as they have a tendency to blow off.

In the interest of public safety the public should know the Difference between Hackney and Private hire. Suggest advertising in the local press as some of the public do not know the difference.

Stretch Limousines.

Does this come under the Road Safety Act 2006 contract? exemption rule 75b Miss Act which came in force in January 2008? Will you please define who comes under this act?

There is no policy to define which type of vehicles comes under this act. Vehicles doing company contracts should be licensed.

Some we believe have done so i.e. chauffeur cars.

7 of 56

English Language

Objection to the tests be carried out by an SBC officers. Only a registered nationally recognized examining body should be instructed to carry out such tests. Are SBS qualified? If yes define procedure.

7 of 56 **Driving Proficiency and Qualifications**

Objection to paragraph commencing 'Existing holders....' Grandfather Rights apply.

Object to all the points raised in following paragraph. In contradiction to DVLA standards.

Complaints on driving standards to be discussed with the driver.

Objection to 'for any reasonable cause' – comprehensive list 'reasonable cause'. Proposal is left to individual licensing Officers' decision – not acceptable.

All these are restrictive approaches.

Define points for offences i.e. 12 points.

8 of 56	Medical Examination	Objection to medical tests every 3 years. Recommend to be put in line with DVLA Group II Licenses which are renewable every 5 years
9 of 56	CRB	Concerns regarding destruction of CRB copies issued to Licensing department. .
11 of 56	1.2	<p>Objection to having NAME of driver on badge. Number should be sufficient. Health and Safety Violence at work recommend forenames only. This issue has already taken 2 years and not resolved. We were told it would be presented at the last committee meeting and amended but it was not. The last time a badge was made a middle name was added! The</p> <p>blame was put down to software surely the software does not add a further name without the user giving it the information. Suggest you change the software to a more reliable one. The SBC has duty of care under the health and safety Act 1974. Identity theft, robberies to be considered. Police only display a number.</p>
12 of 56	1.6	The driver has a right to stand on the road in a public place as To suggest that the vehicle is plying for hire can be viewed as slander. Road tax is paid on a licensed vehicle.
12 of 56	2.2	Objection as above – In contradiction to DVLA standards.
12 of 56	2.5	Objection – Only necessary if any affects the quality of their driving standard. DVLA requirement.
14 of 56	4.6	Objection – FPN include parking fines. Do not agree with this proposal.
17 of 56	9.3.2	Objection – Not practical and Health and Safety implications.
17 of 56	9.3.3	Need further clarification.

17 of 56	9.3.4	Need further clarification.
17 of 56	9.4	'The TX series, Metro cab (London style vehicles or any vehicle...)' Vague description. Open to interpretation. Require complete definition. Grandfather rights apply.
18 of 56	9.8	Objection – Not feasible with all types of vehicles, e.g. London FX type. Vehicle shall be provided with sufficient luggage space for number of passengers which the vehicle is licensed. Suggest remove this policy. ✓
18 of 56	9.9	objection as stated in Livery page 5.
18 of 56	10.2	Objection. Health and Safety implications.
18 of 56	10.3	Objection. Please define not necessary.
18 of 56	10.4	Objection. Please define.
18 of 56	10.5	Objection. Please define Saloon, Estate etc.
19 of 56	11.3.1	Objection . All licensed vehicles should subject to same policies.
19 of 56	13.1	Objection. Discriminate against manufactures rights.
19 of 56	13.7	Objection. Weight limits need to be put in place.
20 of 56	13.10	Objection. All drivers of W/C vehicles should be trained By the Council issuing the licences.
21 of 56	18.3	Objection -working vehicles a degree of wear and tear must be accepted e.g. minor stains.
21 of 56	18.4	Objection – As above.
21 of 56	18.7	Objection – Marked bulbs not necessary - surplus to requirement.

24 of 56	21.1	Objection – not practical. Police allow 7 days for any documentation presentation. Surplus to requirement. Driver has badge ID (Data Protection act).
24 of 56	22.1	Objection – responsibility of cost and replacements? Risk element can it be removed at night? No consultation has been made on this , plate objection.
24 of 56	23.1	Objection – Any local authority emblems represent advertising – dual standards.
24 of 56	23.3	Council approved signage needs to be addressed before approval of this proposal
25 of 56	23.4	Objection. Vehicles are used for personal transport and reject the proposal for permanent signage. We are responsible for our own cars. Police and Head of Licensing advised on 07/07 to park your car against a wall when Possible. Remove everything so it does not look like a taxi/ph vehicle. (stick on signs cannot be removed) magnetic are now used.
25 of 56	25.1	Objection. As with 4.6 do not agree with notifications of cautions and unrelated driving FPN.
26 of 56	28.8	Objection. No brakes required for trailer less than 750K Manufactures cannot fit them to small trailers.
26 of 56	28.10	Object – Trailer not part of licensed vehicle.
27 of 56	29.3	Objection -to mileage set in proposal Object to 15000 miles every 6 months. Agree with National

Private Hire Association that car's that have failed with 3 mechanical faults have a 6 monthly retest. Drivers who look maintain their car's well should only require 1 test annually, irrespective of the age or mileage of the vehicle.

28 of 56	29.32	Objection. Concerns regarding current SBC testing centre is not VOSA approved.
28 of 56	33.3	Objection. Test availability is restrictive. The SBC testing centre is not VOSA approved. It is not solely used as an MOT station only . Only 1 loading bay and NO viewing area. Any faults found the driver has to be escorted across an area where other vehicles i.e. lorries are entering and exiting. How can we have a valid certificate of compliance if not VOSA approved? Why can we not use other approved VOSA facilities which are better equipped and more available.
28 of 56	33.5	How will a driver know 7 days prior to the test if he is Unavailable i.e. sick, off the road etc.? MOT as agreed 24 hours notice. It is not the drivers fault if Cavendish Rd Depot cannot cope with nor have the correct facilities or cope with the large influx of cars.
28 of 56	34.1	Objection – Data retrieval access restricted.
28 of 56	35.1	Objection – Ultimate responsibility should lie with the passenger to ensure they remove all their belongings on egress of vehicle.
29 of 56	appendix C no:3	Objection – surplus to requirement.
29 of 56	appendix C no:11	Objection – Minor rust will occur. Rust no an issue if the operation of the wiper is not affected.
29 of 56	appendix C no:17	Objection – Not necessary if operation not affected.

30 of 56	appendix C no:18	Objection – Seat covers should be well fitted only.
30 of 56	appendix C no: 21	Objection – Not necessary to be manufacturers original.
30 of 56	appendix C no:23	No Smoking ban in place since June 2007. Point irrelevant.
30 of 56	appendix C no: 29	As above – Not necessary to be manufacturers original specification.
30 of 56	appendix C no:30	Objection – Health and Safety implications. Cargo guard surplus to requirement.
32 of 56	1.3.2	Objection – as page 17 9.3.2
33 of 56	1.7	<p>Objection-We the trade object to Licensing setting conditions where Hackney Carriage vehicles has to be manufactures black. We are self employed and have the</p> <p>right to choose which colour we like. If the vehicle complies to regulations i.e. illuminated dome at night, and plate on the rear. It is restrictive practise that a private hire vehicle can choose its own colour. From a safety aspect you are more visible at night in badly lit areas in lighter colour vehicles. Buying a vehicle is governed by price and availability. Most car warehouses where the majority of vehicles are bought stock very few black colours i.e. Car Giant.</p>
33 of 56	1.8	Objection – Unreasonable requirement.
33 of 56	2.2	Objection – 4 door vehicles in operation i.e. Ford Galaxy.
34 of 56	5.1	Objection – as page 19 13.1
36 of 56	8.1/ 8.2/8.3	Objection – Restrictive usage of the First-aid Kit Even First aiders have restricted used.

36 of 56	10.3.3	Superfluous to the requirement of a driver. Objection – Properly fitting seats covers should be acceptable.
36 of 56	10.7	Objection – Marked bulbs surplus to requirements.
39 of 56	13.1	Objection -- as page24 21.1
39 of 56	15.2	Objection – Restrictive practices.
39 of 56	15.3.1	Objection - Need further clarification.
39 of 56	15.4	Objection – Restrictive practice
39 of 56	17.1	Objections – None driving FPN and cautions should not be include.
41 of 56	20.7	Objection - No brakes required for trailer under 750K
41 of 56	21.2	Objection – annual compliance test should be sufficient.
42 of 56	21.3	Objection – Mileage restriction and documentation unnecessary.
42 of 56	25.2	Objection – SBC does not have a VOSA approved testing station.
43 of 56	26.1	Objection – Issues with data download restrictions.
45 of 56	1.5	Objection – Not necessary for every complaint.
45 of 56	1.8	Objection – Owner driver responsibility.
46 of 56	1.10	Objection – As Previous Objection – Taxi drivers are self-employed. No PHO has been issued with a W/C accessible vehicle. This proposal is not within the PHO jurisdiction. Any new ruling will need to be inclusive of all PHO irrespective of the number of vehicles on their circuit. Further investigation pending.

47 of 56	5.1	Objections – As previous Objection – FPN include parking fines- Non driving offences and cautions should not be included.. Do not agree with this proposal.
47 of 56	6.1	Objection - Why the need?
52 of 56	appendix G no:6	Objection to the tests be carried out by an SBC officers. Only a registered nationally recognized examining body should be instructed to carry out such tests. Object to all the points raised in following paragraph. In contradiction to DVLA standards.. Objection to 'for any reasonable cause' – comprehensive list 'reasonable cause'. Proposal is left to individual licensing officers' decision – not acceptable. All these are restrictive approaches.
53 of 56	Vehicle licence	Objection – SBC not a valid VOSA approved centre.
54 of 56	Operator's Licence	'The Authority can ask any questions' ...Objection should have a comprehensive list of questions relevant to the Private Hire Industry.

Submitted on behalf of the Trade by *StevenageCabTrade Association*.

Response to:-

Taxi and Private Hire
Conditions of Licensing
July 2008

LICENSING

31 OCT 2008

RECEIVED

On Behalf of [REDACTED]

31/10/2008

Thank you for the opportunity to respond to the above proposal.

Please find our comments detailed below.

Appendix A

Section 1 – No comments.

Section 2 – No comments.

Section 3 - No comments.

Section 4 – No comments.

Section 5 – No comments.

Section 6 – No comments.

Section 7 – No comments.

Section 8 – No comments. (Not Applicable)

Appendix B

Section 9 –

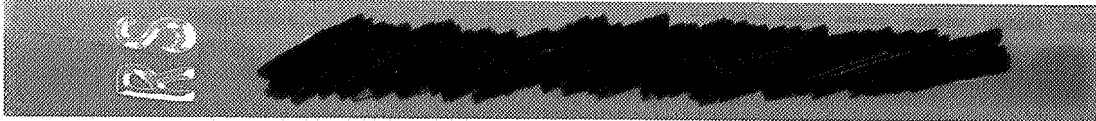
9.9 - A large percentage of limousines in the UK are black. We feel that the overall 'look' of a limousine should signify to members of the public that it is not a Hackney Carriage. Although at present, we do not have a black vehicle, should the market dictate we acquire one, we would be unable to under this sub-clause.

Section 10 – No comments

Section 11 –

11.3.1 – We will require this exemption as no limousine has clear windows rear of the drivers side windows. Any limousine purchases following adoption of the new conditions will also require exemption.

Section 12 – No comments



Section 13 – No comments (Not applicable)

Section 14 – Covered under Appendix F

Section 15 – Covered under Appendix F

Section 16 – No comments

Section 17 – No comments

Section 18 –

18.13/14 Whilst the vehicle carries a spare wheel on 99% of journeys, on rare occasions such as airport runs, where customer luggage takes up a large proportion of space, it is normally necessary to remove the spare wheel from the car to facilitate to carriage of said luggage. We would like to be granted exemption from this for the occasions where excessive luggage space is required.

For the councils information, We have a brand new 2008 Ford Galaxy. Non private hire. This vehicle does NOT have a spare wheel, nor is one available. Ford have selected to provide a pump with a temporary sealant for minor punctures instead of a spare wheel.

Section 19 – No comments

Section 20 – No comments

Section 21 – No comments

Section 22 – No comments

Section 23 –

23.5 – We would like to apply for such exemption.

Section 24 – No comments

Section 25 – No comments

Section 26 – No comments

Section 27 – No comments

Section 28 – No comments

Section 29 – No comments

Section 30 – No comments

Section 31 – No comments

Section 32 – No comments

Section 33 –No comments

Section 34 –No comments

Section 35 –No comments

Appendix C

No comments for this appendix

Appendix D

No comments for this appendix

Appendix E

No comments for this appendix

Appendix F

1.1.4 - All Limousines that are used in the UK must have passed an SVA test at a VOSA (Vehicle Operator Standards Agency) station before being given a UK vehicle registration number. We have spent a considerable amount of time trying to find any data pertaining to 3 point inertia seatbelts being used in either side facing or rear facing seats. To date, we have not been able to find any official testing or data on said situations.

It is not possible to purchase a stretched limousine, with the exemption of the type that are typically used for funerals, that are equipped with 3 point seatbelts for side facing and rear facing passengers. This includes brand new models that are currently being imported and checked under VOSA guidelines. At this point in time, 3 point inertia type seatbelts are not a legal requirement as we are unable to find studies indicating they are safe in this method of use.

We believe that this subsection of the conditions will significantly affect our business, as we will be unable to obtain vehicles that meet this requirement. We would like to formally object to this sub-section.

1.1.5 No Comment

1.1.6 - We have tried to use of Plastic glasses within the car and found that rather than increase passenger safety, they often increase the likely hood of injury. In a 4 week trial, we used plastic glassware within all of the drinks holders. The conclusion that we came to very early on that whereas high quality lead crystal glasswear was well looked after, well received, strong and durable, the plastic items were often dropped, trodden on, and shards of sharp plastic were left embedded in the carpets and seats endangering passengers, drivers and cleaners alike. During the time we have been trading, we have NEVER had an

[REDACTED]

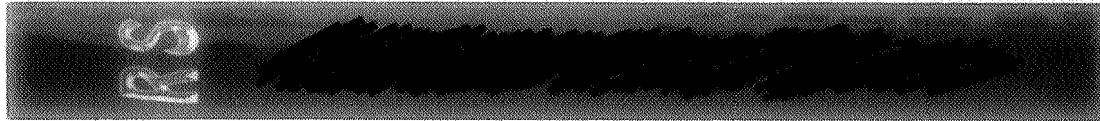
injury caused by glass or any other reason. We have since the trial, returned glass receptacles to the car and found that overall customer perception and respect for the vehicle has increased massively. We try our best to be green and ensure our customers used bottles are recycled. We found that the plastic glasses were just ending up as landfill which cannot be good for the environment. Passenger safety and care has, and will always be, our top priority. While we understand the councils concerns about having loose glass in the vehicles, our experience shows that glassware gets returned to the proper holders whilst plastic glassware tended to be left loose in the bar, vastly increasing the number of spillages to personal clothing and the interior of the car.

We permit customers to bring their own drinks into the vehicle as we do not supply alcoholic drinks. On occasions, the clients may request the dividing screen is raised, thereby obscuring the drivers view of the entire passenger compartment. We can request that passengers do not refill glasses whilst the vehicle is in motion but in these circumstances, it is impossible to police. We would love the proposed guidelines to say that the privacy screen must NEVER be raised, but even in this case, it is unsafe for the driver to be concentrating on what is going on in the back of the vehicle, especially whilst the vehicle is in motion as you will agree, drivers should be concentrating on the road ahead and all of the potential hazards that may present themselves.

1.1.7 - Agreed in full

1.1.8 We would appreciate clarification on this issue. Whilst the television within the vehicle is predominantly for the use of the driver whilst waiting for clients, on occasions, we are requested by clients to put on their own DVD's or video media. There is no legislation we are aware of that prohibits this as the video is being displayed in a private group very similar to that of a house party or small family gathering. We would not consider 8 people or less, within an enclosed area, public performance, as we have never supplied the video material, and certainly never received any monetary gain from allowing them to use the equipment. Pornographic material is never permitted within the vehicle and will never be shown.

2.1/2.2 We took the decision 2 years ago to install a bracketed fire extinguisher in the driver's compartment of the vehicle. This is a 2kg dry powder extinguisher designed for large vehicles. Although we can see the benefit of having 2 sources of extinguisher, 1 in the cab and 1 in the boot of the vehicle, in actual use, the extinguisher in the boot would be impossible to obtain without entering the drivers compartment, either to spring the boot lid from the master switch, or to obtain the ignition key and release the boot by the use of the lock. As with most cars, the fuel tank is at the rear of the vehicle, directly underneath the boot area. In the event of a collision that had caused a fire, we felt it would be dangerous to return to an area of the car where a fuel leak may have occurred during impact.

- 
- 2.3 Agreed in full
- 2.4 This will be done anyway.
- 2.5 This has never been requested but agreed in full.
- 3.0 The child locks on the vehicle are never activated as this could trap passengers in the event of a fire or collision. Following a near miss, the rear offside door has been reprogrammed to lock as the car moves away but not to unlock on the pressing of the drivers control switch. I am sure this is not restricted to limousines, but on one occasion, a passenger attempted to leave the vehicle by the offside door and stepped out in front of an on-coming car. The door can easily be opened manually by lifting the door lock mechanism and pulling the handle. This is explained before every journey.

Appendix G

No comments for this appendix

We would like to actively work with the council to ensure customer safety and the best possible service, whilst acting within current legislation.

We have access to a vast knowledgebase within the industry and would like to assist where we can.

Robert.Cox

From: Alison Watts
Sent: 30 October 2008 06:52
To: Heather Morris; Robert.Cox
Subject: FW: Taxi and Private Hire Policy Consultation Form submitted

-----Original Message-----

From: Sbc-Website
Sent: 29 October 2008 16:13
To: Licensing
Cc: Sbc-Website
Subject: Taxi and Private Hire Policy Consultation Form submitted

Taxi and Private Hire Policy Consultation

Ref ID: 13240

Date: 29.10.2008

User Details

Submitted By: Mr [REDACTED]
Organisation: Hertfordshire County Council
Address:
PO Box 99
County Hall
Hertford

SG13 8TJ

Tel: [REDACTED]

Email Address: [REDACTED]@hertsc.gov.uk

Questions

Livery? Y
Maximum age limit? Y
Wheelchair accessible? Y
Medical report? Y
English language test? Y
Driving test? Y
Standard door sign? Y
Interior identification plate? Y

COMMENTS

INTRODUCTION

PROCEDURES AND STANDARDS

DRIVERS

The County Council makes significant use of taxis & PHVs to transport schoolchildren and vulnerable adults. We are therefore keen to ensure that all drivers complete an enhanced CRB check as part of the licensing process. We would also like all taxi & private hire drivers to be checked for working with children and/or working with vulnerable adults by ensuring that the relevant part of section Y is completed on the disclosure form. This is clearly important for the clients for whom we are arranging transport but we believe that children or vulnerable adults may travel privately by taxi at any time and are entitled to expect that drivers have been thoroughly checked to the highest standards.

APPENDIX A

APPENDIX B

Accessibility - page 4

The County Council makes transport arrangements for significant numbers of passengers who travel in wheelchairs and would like to see sufficient numbers of licensed vehicles that can carry two or more passengers in wheelchairs at the same time. As well as benefiting the client groups for whom we need to arrange transport, we feel that this would benefit the wider community where groups of wheelchair users may wish to travel together.

APPENDIX C

APPENDIX D

Accessibility - page 4

The County Council makes transport arrangements for significant numbers of passengers who travel in wheelchairs and would like to see sufficient numbers of licensed vehicles that can carry two or more passengers in wheelchairs at the same time. As well as benefiting the client groups for whom we need to arrange transport, we feel that this would benefit the wider community where groups of wheelchair users may wish to travel together.

APPENDIX E

APPENDIX F

APPENDIX G

Do they broadly agree with the proposed policy? : Y

GENERAL COMMENTS

NPHA

COMMENTS & CONCERNS

- Remove requirement for colour schemes for vehicles. This requirement has been defeated in the courts on a number of occasions and public could mistake like coloured, privately owned vehicles for HC or PHV vehicle of similar colour.
A better alternative is to press for distinctive roof signs on HC's and signage on PHV's
- Byelaws are the only way to control the use of HC proprietors. Include certified byelaws within the P & C document. The use of dual licenses to achieve this aim is questionable.
- P4 Maximum Age of Vehicles – Questioned inclusion of pre 1994 as the later document relates to no age limits applying. Questioned inclusion of exemption for non-motorised vehicles.
- P13 3.4 does not apply to private hire.
- P15 8.4 Permit exemption for drivers who have a medical exemption, older drivers etc.
- ✓ P17 9.7 Suggests amendment to 1,400cc engines to allow for modern, fuel efficient and enviro' friendly, smaller engines.
- ✓ P18 11.1 Questioned the tinted windows requirement as most vehicles have some degree of tint.
- P20 15.5 Fire brigade advise that fire extinguishers should be retained in the boot of a vehicle. In the event of a vehicle fire the passengers have to vacate the vehicle to get fire extinguisher. If in vehicle and an engine or under dash fire occurs the fire extinguisher may be unreachable.
- Q P22 19.1 LA have no right to require calendar meters in PHV's as there is no right to set or control PHV fares.
- P23 19.8 As above. LA cannot control PHV fares and cannot insist on calendar controlled meters. Hastings case refers where similar overturned in court. ✓
- P25 23.7.2 Change to include that "No Smoking" signs are a legal requirement and shall be displayed.
- P26 27.1 Duplicate of 6.1
- P26 28 No power for LA to inspect or plate trailers – remove para. Under drivers – add para to ensure that drivers who wish to tow trailers hold proper licence.
- P27 Age Limits – rewrite testing requirements to encourage poor maintainers to improve through re-testing.

- P28 35.1 Duplicate of 5.1
- P30 23 Remove as not required. No smoking reg's.
- Appendix D – Add byelaws. Para 1 – remove reference to private hire vehicle.
- P32 1.3.5 Amend to read “Any purpose built...
- P32 1.6 Suggests amendment to 1,400cc engines to allow for modern, fuel efficient and enviro' friendly, smaller engines.
- P33 3.1 Remove private hire vehicles from para
- P35 7.5 Fire brigade advise that fire extinguishers should be retained in the boot of a vehicle. In the event of a vehicle fire the passengers have to vacate the vehicle to get fire extinguisher. If in vehicle and an engine or under dash fire occurs the fire extinguisher may be unreachable.
- P41 No power for LA to inspect or plate trailers – remove para. Under drivers – add para to ensure that drivers who wish to tow trailers hold proper licence.
- P47 LA should be considering the implications of the Corporate Manslaughter Act and in respect of PHO including, and checking, possession of Public and Employer Liability Insurance, Fire Certificates/Inspections/Extinguishers, possession and display of H & S regulations in offices/public spaces, No Smoking signage. (Applies to those operators who employ office staff/have provision for public access/waiting. **Suggests that CPC for PHO will come in by 2010**