

From: [REDACTED]
Sent: 01 May 2019 14:00
To: Licensing Team
Subject: Re consultation private hire

Categories: [REDACTED]

1) vehicle testing for cars over 10 years old

At what cost would this be ,if i have to have a test every 4 months on my car ,does this mean i have to pay £133 every 4 months plus another £75 to the garage , giving over £624 a year or would the yearly charge of £133 be divided by 3.

So each 4 monthly test would be £44.33 plus whatever the garage would charge.

2) medicals

Why are you intending on trying to bring in medicals for every 3 years until the age of 60, then yearly.

The government allow drivers who either drive class 1 hgv or pcV drivers who carry upto 80 passengers and they only need a medical every 5 years until they are 65

3) plates.

All across the country drivers are complaining that their cars are being targeted by thieves, because of having to display their rear plates 24/7. I agree if i am working my vehicle should display its plate ,but why should i when i am not working and its parked at home

Limo vehicles are allowed to just have their rear plate in the boot, even when working.

4) drivers badge

When i am wearing my badge ,my passengers cannot see it in plain view because rear passengers cannot see through seats anyway.

What is better is ,if we were allowed to display it hanging from the mirror or displayed on the dashboard All passengers could see it in plain view ,just like you allow limo drivers to display theirs in a prominent position.

5) door signs

Only if magnetic,

Can take them off when not working and wont be a red flag to the little ~~signs~~ that target taxis and private hire cars because of the plates making us easy pickings for theft when our cars are parked up at home .

6) no reminders from the council

What are we actually paying over £266 per year for then, if the onus is on us drivers .I didnt think the council were allowed to make a profit out of taxi fees,/renewals.

Why are you asking for us to renew 28 days before expiry of drivers badge, just seems a bit long for a renewal ,seeing as dbs will be online from now on

Sent from Samsung tablet

[REDACTED]

From: [REDACTED]
Sent: 13 May 2019 09:46
To: Licensing Team
Subject: RE: LICENSING CONSULTATION of Hackney Carriage and Private Hire Policy 2019

Hi Everyone

I comment at the moment regarding the proposed changes to the medical;

For drivers lucky enough to be under 60yrs old does it not make sense the medical is then aligned with the Private Hire Drivers renewal application? There is as always an anomaly's with drivers existing medical expiry dates and some consideration/flexibility might be needed to enable everyone to align.

Kind regards,

[REDACTED]
Braithwaites Chauffeurs

[REDACTED]

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From: Licensing Team <Licensing.Team@threerivers.gov.uk>
Sent: 24 April 2019 10:49
Subject: LICENSING CONSULTATION of Hackney Carriage and Private Hire Policy 2019

Dear Sir/Madam

RE: Draft Three Rivers District Council Hackney Carriage and Private Hire Policy 2019

Three Rivers District Council is the Licensing Authority for the Three Rivers District. One of the requirements of the Local Government (Miscellaneous Provisions) Act 1976 is that the Licensing Authority has in place a policy, which must be reviewed regularly.

This review is the appropriate time to make any changes to the Policy which are considered necessary in light of previous experiences in determining applications, conducting compliance and enforcement checks and based upon changes to legislation and guidance.

The Council is legally required to consult upon its "Hackney Carriage and Private Hire Policy" and it is to that end that we write to you now. As a statutory consultee and/or other person or body representative of the taxi licensing trade the Council would welcome your comments on its draft Policy. Any comments you make should include your name, any organisation or persons you may be responding on behalf of and your address. All comments received will be made public via Council agendas.

The Policy is available on the Council's web site at:-

A hard copy will be provided upon request only.

It is the Council's view that changes where required to the Policy including;

- The inclusion of a contravention points system,
- Mandatory training for drivers
- Requirement to sign up for the DBS update service
- An increase in driver experience
- Three yearly medical certificates required
- A reduction in the maximum age of new vehicles on the fleet and an increase in compliance tests for older vehicles to raise the vehicle standards. All new vehicles will need to meet M1 and Euro 5 standards for emissions
- An inclusion of a dress code
- An update to the CCTV policy following changes to data protection and GDPR.
- The addition of NAFN (National Anti-Fraud Network). Data national base for refused and revoked drivers.
- No part worn tyres to be fitted to vehicles
- Door stickers to be attached to all Private Hire Vehicles
- Inclusion of tinted windows policy

However these changes are subject to any views expressed, and therefore we would encourage you to take time to read the Policy and forward any comments to the Licensing Team at Licensing.team@threerivers.gov.uk or, alternatively, you may wish to send written correspondence to:

Three Rivers District Council
Three Rivers House
Northway
Rickmansworth
Hertfordshire
WD3 1RL

The consultation period runs for 28 days and will end on **23rd May 2019**. At the end of the consultation period any comments received will be considered and the Policy will be amended as necessary before being approved by Full Council.

I look forward to receiving your comments.

Regards

[Redacted Signature]

Lead Licensing Officer
Regulatory Services
Three Rivers District Council
Three Rivers House
Northway
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www.threerivers.gov.uk <https://my.threerivers.gov.uk/>



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Tel: 0208 428 1300



6. Administration of licences

Applications for licences will only be validated and then determined when all documents and fee (as applicable) are received, as stated within this policy. The Council will always aim to produce licences as promptly as possible. Applications will normally be considered within 28 days of validation and, depending on circumstances, an application can then be granted, refused or deferred.

We question then why it has taken longer? In one case one of my drivers was unable to work for over 8 weeks. It is understandable that complications can arise but no information or feedback was ever forthcoming. On other occasions peoples licences have been delayed due to staff at Three Rivers loosing and or miss filing application documents. Of course there is and can always be human error but twice in two weeks???

12. Data protection

All information held on files and databases about an applicant is confidential, under the Data Protection Act 1998. However, the Council is under a duty to protect the public and to protect the public funds it administers, and to this end may use any information provided by an applicant within this authority. The Council is under a duty to maintain Public Registers in accordance with the legislative requirements and all registers will be maintained on line through the Council's Licensing Public Register.

Data protection is obviously important to us all. Can we ask that emails coming from you up at TRDC do not disclose our email and home addresses. I refer to the email dated 24th April 2019 from Lorna Fryer, where all email address were visible and the PDF file attached showed a HC drivers home address.

16. Hackney Carriage and Private Hire Drivers

All new applicants are required to pass a specialist driving test as part of their application. Existing drivers who have not passed a driving test as prescribed by the Council will only be permitted to carry up to 4 passengers. This will be stipulated on their licence. Existing drivers are entitled to take the specialist driving test at any time and once passed will be issued a badge permitting 8 passengers, at no additional cost on production of their certificate.

Completely understand the new specialist test requirements for new drivers but don't understand how this can affect existing license holders. It is the Vehicles licence that determines the number of passengers carried not the drivers HC/PH licence?

25.13

Points for Unattended vehicles A vehicle will be considered to be unattended if it is considered that the driver would not be available to be hired when a customer approached. Therefore, points would not be issued simply because the driver was standing outside of the vehicle but would be likely to be issued if the driver is not close enough to the vehicle to acknowledge the customer when they approach. Taxi ranks are provided for drivers to show that they are available for hire, and are not a parking provision for licensed vehicles.

Taxi Ranks are a sore subject for us who are based in South Oxhey. We have written to TRDC and Hertfordshire Highways in the past and also have involved the local councillors. A HC Taxi Rank has been in Station Approach South Oxhey for approximately 60 years. The Rank was sufficient to accommodate 8 Vehicles up until the new development started. The Rank has now been reduced to just 4 spaces. In this time another Taxi firm has moved to the area and also has a number of HC Taxis. At the moment there could be 12 vehicles all trying to park up on rank at Station Approach and we believe this number is expected to increase in the near future. Therefore Rank space is very limited. More Rank/ designated Taxi parking spaces are desperately needed for drivers on duty in this area.